

Report of External Evaluation and Review

Imperial College of New Zealand

Confident in educational performance

Confident in capability in self-assessment

Date of report: 10 June 2016

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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 (Imperial)

Type: Private training establishment (PTE)

First registered: 2002

Location: Level 3, 16 Waverley Street, Auckland

Delivery sites: As above and 7 City Road, Grafton, Auckland

Courses currently

delivered:

Certificate in English

National Diploma in Business (Level 5)

National Certificate in Business (Level 6)

Diploma in Management (Level 7)

Code of Practice signatory: Yes

Number of students: Domestic: nil

International: 461 students; all full-time – 461 EFTS (equivalent full-time students), most from India, but also from Fiji (seven), Philippines (six), China (four), Vietnam (three), Cambodia (three), Thailand (one), Pakistan (two), Nepal (one), and

Austria (one)

Number of staff: 21 full-time and five part-time

Scope of active Imperial has consent to assess for unit standards accreditation: in business-related fields on the New Zealand

Qualifications Framework (NZQF):

http://www.nzqa.govt.nz/providers/nqf-

accreditations.do?providerId=749943001

Distinctive characteristics:

Imperial operates in the Auckland Central Business District and is focused primarily on business-related programmes, but includes an English language programme, and enrols only international students. The organisation's stated aims relate to growth in student enrolments, widening its programme offerings and maintaining

educational quality.

Recent significant changes: A number of new teaching staff have joined

recently to deliver the level 7 management

programme.

Previous quality assurance

history:

The most recent NZQA evaluation was in September 2014 and NZQA was Not Yet Confident in the organisation's educational performance and Not Yet Confident in its capability in selfassessment.

National external moderation of assessment material and judgements by NZQA in 2014 and 2015 resulted in all submitted materials being confirmed to be fit-for-purpose, and to have been marked at the national standard. In the previous three years, Imperial was found to be not assessing at the national standard, but these matters have been satisfactorily corrected. No other standard-setting bodies are involved in Imperial's moderation processes.

2. Scope of external evaluation and review

This evaluation included the mandatory focus area of governance and management, which provides an overview of the strategic and operational levels of the organisation.

The two National Diplomas in Business programmes offered at levels 5 and 6 were reviewed as one focus area. This provided the evaluation team with an overview of student success at level 5, and progress to the level 6 diploma. This focus area also allowed a review of how well students are supported to transition to higher tertiary study.

The third focus area was the programme leading to the Diploma in Management (Level 7). This programme comprises the largest single group of students and the highest-level programme offered.

These focus areas encompassed the majority of students enrolled with Imperial.

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.

A phone interview was held with the principal prior to the site visit, to explore the scope and process for this evaluation. This provided a comprehensive background to the organisation and current courses and included a discussion exploring what actions had been taken to address matters that arose at the previous evaluation. Imperial initially submitted a detailed self-assessment summary of its improvement plan and actions completed to address issues from the previous evaluation, and subsequently also submitted a summary of student achievement rates and outcomes. These documents provided a comprehensive picture for the evaluation team in preparation for the site visit. The evaluators sourced further information from within NZQA business units, Tertiary Assessment and Moderation and Risk Monitoring, and NZQA's database, as well as researching Imperial's website.

Two evaluators spent two and a half days on site conducting interviews with one of the two owner-directors, the college principal, programme coordinators, members of the advisory board, tutors from the level 5 and 6 business diplomas and the level 7 diploma, and two randomly selected groups of students (from the business and management programmes). A third evaluator spent one day reviewing the organisation's capability for developing programmes for NZQA approval, and conducted a review of a sample of student files. The third evaluator was seen as a necessary addition to the evaluation following a significant concern identified by NZQA about a recent programme application. The evaluators reviewed an extensive range of the organisation's documents, records and student management system to confirm and validate the information gained from interviews. External stakeholders, such as employers of graduates, were not interviewed, due to sufficient evidence being available through the range of personnel interviewed and internal records and documentation.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **Imperial College**.

The main reasons leading to this level of confidence are:

- Qualification achievement rates are consistently high across the three programmes.
- Achievement rates are validated by robust internal controls, including pre- and post-assessment moderation, and independent external moderation conducted by a staff member of a local polytechnic and by NZQA's Tertiary Assessment and Moderation unit.
- Imperial benchmarks its achievement rates year on year, which show
 consistently high rates of achievement. External benchmarks have been used
 by Imperial to monitor its performance against a group of seven similar tertiary
 education organisations (funded by the Tertiary Education Commission). This
 external benchmarking shows that Imperial sits in the top quartile of this group,
 for both retention and graduation rates, further supporting the judgement of
 consistently high achievement rates.
- The majority of graduates from the National Diploma in Business (Level 5)
 move on to level 6. While the level 7 management programme is relatively new
 (approved December 2013, first enrolments 2014), some students are
 progressing well.
- Student attendance is monitored very closely, which contributes to student motivation and high achievement rates.
- Students gain significant value from studying at Imperial, with a high proportion
 of graduates gaining work rights and employment in New Zealand in a related
 field to their study.
- Programmes are well designed to meet the approved programme structure, hours of delivery, and students' learning needs. Teaching programmes include a wide range of teaching strategies and assessment types, and robust academic checks providing assurance of the authenticity of students' assessments.
- Teaching staff are well qualified and experienced for their roles, and there are robust processes for peer observations, performance reviews and access to relevant professional development.
- In the past, Imperial has operated in a more reactive than a proactive mode.
 The evaluators observed a distinct change to a more proactive approach, developing processes to improve its internal capabilities, and removing reliance on external educational consultants.

In conclusion, the evaluators consider that there was sufficient evidence of validated student achievement, outcomes of value, and quality processes for NZQA to have confidence in Imperial's governance, management and educational performance including programme planning, teaching and assessment, and student safety and support.

Statement of confidence on capability in self-assessment

NZQA is Confident in the capability in self-assessment of Imperial College.

The main reasons leading to this level of confidence are:

- The organisation has developed a critical reflection culture and has wellestablished processes to track and reflect on its performance, as well as addressing the issues identified in the 2014 NZQA evaluation in a sound and well-considered manner.
- A wide range of surveys are used to monitor satisfaction and value by students, graduates, employers and agents. These are analysed and used effectively, and contribute to ongoing improvements, for example to resources and teaching materials.
- Class representatives provide an effective communication process to supplement the student surveys, and provide more frequent and informal feedback from classes to tutors, programme coordinators and management.
- The organisation has a wide range of meetings, as is appropriate for a tertiary institution, to monitor and reflect on progress and to plan and improve teaching strategies and resources, assessments and student support. The meetings involve class representatives, tutors, programme coordinators, the advisory group meetings, and weekly communications between the directors in Melbourne and the college principal via Skype and email.
- Assessment materials and tutors' judgements are moderated through a wellplanned and executed internal process which includes a person independent of the tutors choosing samples to moderate and an external specialist from a local polytechnic carrying out the moderation. This provides a good level of surety to validate the achievement rates.
- Imperial has reflected on previous failures with external moderation, which were identified between 2011 and 2013. Self-assessment and resulting actions have improved assessment practices. Previous failings were not evident at this evaluation. Imperial has submitted assessment material to NZQA for external moderation. All the assessment material has been judged fit for purpose and at the national standard, further validating achievement rates.

In conclusion, Imperial has responded quickly where failures have been identified, and the actions taken have been effective in rectifying concerns from the previous evaluation. A recently identified failure with an education consultant has prompted

the organisation to prepare for the future development of all materials by Imperial staff to ensure they are effectively quality controlled and authentic. In light of the above, the evaluators consider that NZQA can have confidence in Imperial's capability in self-assessment.

Findings¹

1.1 How well do learners achieve?

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

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

Learners have achieved at consistently high rates in the two years since the most recent evaluation. The rates for retention (staying in the programme for the full year) and the rates for completion (successfully completing all assessments and graduating with the qualification) are both consistently high for all programmes included in this evaluation. The majority of students graduating with the National Diploma in Business (Level 5) stay with Imperial to complete the National Diploma in Business (Level 6), in order to meet Immigration New Zealand work visa requirements (see Table 1). Since the previous evaluation, the organisation has implemented a range of changes (e.g. closer attendance and plagiarism monitoring) that have led to these results.

Table 1. Educational performance data²

Qualification	2014 Retention	2014 Qualification completion	2014 Progression or destination (employment) ³	2015 Retention	2015 Qualification completion
National Diploma in Business (Level 5)	92%	89%	51/54 – 94% progressed to level 6	96%	90%
National Diploma in Business (Level 6)	91%	86%	38/47 – 81% employed in related work at six months	90%	87%
Diploma in Management (Level 7)	NA (no students	NA (no students)	NA (no students)	98%	98%

The achievement rates shown in Table 1 are validated by Imperial through a comprehensive moderation process. This includes moderating assessment tools as fit for purpose prior to use and a randomly selected sample of marked student

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¹ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

² Data as supplied by Imperial College.

³ It is too soon for employment or other destination data to be available at the time of this evaluation for the 2015 graduates, as they are surveyed at six months.

assessments moderated for consistency by a member of the advisory board (and staff member at a local polytechnic). This internal moderation process, combined with the national external moderation conducted by NZQA in 2014 and 2015, indicated that assessments were fit for purpose and judgements were at the national standard. This provides reasonable confirmation of the validity of the achievement rates.

Imperial's learner survey analysis shows learners are highly satisfied with the skills and knowledge they gain. This is supporting learners' stated aims at enrolment which are largely to gain a business-related qualification to help them find employment in New Zealand or in their home country. Interviews with learners at this evaluation confirmed these survey results. The graduation and progression rates, shown in Table 1, for students starting at level 5 and progressing on to level 6 (and now some progressing also to the Diploma in Management (Level 7)), indicate that students are gaining the necessary study skills to succeed in a New Zealand tertiary learning environment.

Imperial has strong data collection and analysis, and uses this on an ongoing basis (in consultation with all staff involved) as a means of monitoring students' progress and success. The use of plagiarism software is effectively used, along with other processes such as teacher observations, to monitor academic quality. It was noted at this evaluation that students' attendance is closely monitored and staff work closely with these students to lift attendance prior to taking any action. Student enrolments are being terminated when students fail to attend satisfactorily (over 90 per cent) repeatedly or for repeat cheating or plagiarism. This provides assurance that Imperial is taking its academic responsibilities seriously and applying sufficient rigour to monitoring these matters.

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

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

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

Students gain significant value from studying at Imperial. The primary value is in gaining nationally recognised qualifications based on programmes approved by NZQA. The programmes are delivered in accordance with NZQA-approved documentation, with due consideration given to the correct hours and weeks for delivery.

A significant number of graduates from the National Diploma in Business (Level 6) have successfully applied to Immigration New Zealand for work visas and gained employment in areas related to their study (of all 2013 and 2014 graduates, 72 per cent are working). Imperial follows up graduates at six and 12 months. Detailed evidence of employment was provided to the evaluation team.

Students are gaining additional skills and knowledge for applying for and gaining employment through supplementary workshops beyond the core curriculum, including curriculum vitae writing for the New Zealand context, and interview and presentation skills. This was seen as adding significant value, as noted in student surveys and confirmed by the students interviewed.

The evaluation team observed students to have appropriate English language abilities for their level of study, allowing them to gain the maximum value from their studies. Aside from the level of English language proficiency evidenced at the student interviews, this was also supported by a review of a sample of student files. The latter included documentation showing that all students enrolled had the appropriate English language levels to meet current regulations.

A review of the organisation's surveys showed that employers were providing meaningful positive feedback on work placements undertaken by level 6 diploma students. The evaluators noted there were a number of employers commenting on some students' inability to work unsupervised. This is an area where Imperial could develop the programme. However, it was not clear whether or not this factor was simply a difference in expectations between different cultures.

The organisation's critical reflections in this area are strong in terms of data collection and analysis, although further research and analysis of the value added could provide useful information for further developing the programme. Imperial will in any case be required to start developing programmes to meet the new requirements of the recently listed New Zealand qualifications following the review of all NZQF qualifications (TRoQ).⁴

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

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

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

As noted, Imperial is planning and delivering its programmes in the mode and total weeks as approved by NZQA. The number of weeks of programme delivery, lesson planning, and the range of teaching and assessment activities suit the programme levels, and students' learning needs, while maintaining ethical good practice. An example of their focus on ethics was illustrated when students asked for their courses to be delivered over two, 10-hour days each week. The request was rejected by management as they believed 10-hour days to be a poor learning and teaching model.

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⁴ http://www.nzqa.govt.nz/qualifications-standards/qualifications/business-qualifications/review-of-business-qualifications/

Programmes include a wide range of learning activities such as group work, case studies, research projects, visiting speakers, and assignments designed to match real-world business processes. Recently, industry visits have been included to observe manufacturing processes first-hand. This was evidenced through programme planning and lesson planning documents cited and confirmed by tutors and students interviewed at this evaluation. Periodic student evaluations and employer feedback indicate that these processes are effective in preparing graduates to gain work-related employment in New Zealand or their home country, as noted above.

By offering three levels of business qualifications, Imperial is providing students with a genuine pathway to higher study to match their study and employment aspirations. Management is responding to student feedback – for example, a recent industry visit was in response to student requests.

While management conducts regular programme reviews for the level 5 and 6 business programmes, they have mainly focused on reviewing the unit standards included on the programmes to ensure they are current and are using the latest versions. The evaluators consider that the current programme review process is less than excellent and limits the possibilities for taking a more holistic approach to reviewing a wider range of factors influencing the effectiveness of all programmes. For example, the organisation may gain benefits from including in reviews the likes of lesson planning, teaching resources, student feedback, results from 'Turnitin⁵', and assessment and moderation of assessment results.

Imperial has established a strong advisory board which provides effective input to the organisation on a range of matters including programme planning. The organisation also regularly surveys students using online software. This is an improvement on the previous evaluation which noted that the face-to-face surveys inhibited some students from speaking up.

1.4 How effective is the teaching?

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

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

Teaching and assessment practices are highly effective.

Imperial has appointed capable teaching staff with qualifications and experience appropriate for the programmes reviewed at this evaluation. Tutors hold or are working towards achieving adult education qualifications. Documents cited at this evaluation showed professional development was well considered and planned in the past and for the current year. Staff confirmed that past plans had in fact been carried out, and added value to their teaching. Appraisal processes include peer

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⁵ <u>www.turnitin.com</u> – software to monitor plagiarism and to improve students' writing.

observations with detailed notes and feedback to staff. This process contributes to professional development.

The evaluators observed professional and respectful relationships and good communications between teaching staff and students, and between teaching staff and management. There is an open working culture with evidence of open communication across all staff. Several staff commented on how this contributes to the sharing of good practice and identifying concerns, for example good assessment examples and practices, or students who were struggling or not attending. Teaching staff are applying a range of teaching strategies which maintain students' interest and contribute to student success.

Since the previous external evaluation and review the organisation has implemented the commonly used Turnitin software to check for plagiarism, as well as informal processes such as observations of changes in students' language style, and Google searches of samples of students' work. The evaluators noted staff comments and documents showing where students were cheating or not referencing material appropriately, with appropriate actions being taken to sanction or remove students from programmes.

Student surveys show consistently positive feedback across the three levels of the programmes reviewed, and this was confirmed in student interviews by the evaluators. There is room for Imperial to establish systems to track and analyse data across programmes, courses or tutors; for example, achievement patterns and emerging issues such as non-attendance or academic misconduct now that the use of Turnitin and other monitoring processes are established. This may strengthen self-assessment processes.

1.5 How well are learners guided and supported?

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

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

Students are provided with a good level of support, with appropriate information provided prior to enrolling; a detailed induction process; access to three staff 24 hours per day for emergency contacts; an open-door policy where students are able to approach staff easily; and key skills training in areas such as curriculum vitae writing and interview skills for the New Zealand work environment. Student satisfaction surveys indicate a high level of satisfaction with the support and guidance provided, and this was confirmed at student interviews.

Imperial has meticulous attendance monitoring processes, with attendance being checked and recorded four times a day. All interventions are well documented, with evidence of students being withdrawn following poor attendance, and immigration New Zealand being notified.

The organisation annually reviews its compliance with the Code of Practice for the Pastoral Care of International Students. While the internal audit documents have a good level of detail of the audit process, there are some areas where this could be strengthened. For example, there are some cases where students' insurance policies do not match course start dates. Imperial staff take out insurance cover with a reputable company when students have arrived on site, sometimes later than the planned course start dates, resulting in insurance dates not matching course start dates. This issue was identified by the evaluation team, but is being rectified by enrolment staff taking out insurance when course fees are received by Public Trust. This will ensure students' insurance is in place when they arrive in New Zealand.

The evaluators identified that the offer of place to applicants, which is required for students to apply for student visas, includes course finish dates covering the full 52 weeks of the programme. While this matches the NZQA programme approval documents, to meet Immigration New Zealand rules, the end dates in the offer of place should match the last date of class time, or assessment. This needs to be corrected by enrolment staff.

Resources have improved significantly since the previous evaluation, with extra classroom space being leased and extra teaching resources purchased to match the growing student roll.

The organisation's critical reflection on student guidance and support includes a wide range of processes such as student surveys and a suggestion box, and a student class representative system providing a good mechanism for facilitating the student voice to reach programme coordinators and managers. As noted, there are some gaps in the organisation's monitoring of its compliance with the Code of Practice.

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

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.

Governance and management have a strong focus on supporting learner achievement, with a number of areas such as resourcing, plagiarism identification, staff professional development, and internal moderation of assessments among others which have been significantly strengthened since the previous evaluation.

The two owners of Imperial, with their key management staff, are taking appropriate actions to rectify the concerns identified at the previous evaluation, and documented evidence sighted at this visit confirmed satisfactory progress is being made to improve all areas of concern, with additional improvements completed at the time of this visit. There have been fairly recent appointments, for example, of key academic support staff for tutors, including a new director of studies and newly formed positions of programme coordinators. The tutors have a high degree of trust in these new staff, and feel very supported by the coordinators.

As noted, the organisation has implemented appropriate steps to identify plagiarism and cheating in students' assessments, has leased sufficient classroom space, and has purchased teaching resources appropriate for the number of students enrolled. The evaluators discussed the organisation's plans for future growth, and management has plans in place for further lease and purchase of resources to match the planned growth.

A recently identified, significant concern about an education consultant who prepared a programme application containing information similar or the same as applications from two other institutions, has been dealt with appropriately by Imperial's owners. The contractor in question has had his contract cancelled and is no longer associated with Imperial. Policies and procedures have been established to ensure the authenticity and validity of any future programme applications to NZQA. These include materials to be written by Imperial staff, and where consultants are used an independent panel is to be established to review applications prior to submission for approval.

Imperial had a previous record of not meeting external moderation requirements with NZQA. However, in the last two years, submitted materials have been judged to be fit for purpose, and assessment judgements have been at the national standard in all cases. This is a significant improvement, providing improved validation of student achievement rates.

The two directors, who live in Melbourne, have regular weekly online video discussions, as well as regular email contact. These processes were confirmed at this evaluation with documentation and staff interviews confirming that there is active participation in the oversight of the New Zealand business. The owners are also involved with tertiary institutions in Australia and Malaysia.

It has already been noted that programme planning and review have required some improvements, and can still be strengthened (see Findings 1.3.)

There are appropriate strategic and business planning processes in place, and while financial reporting to NZQA has been timely, there was no financial business plan available at this evaluation that might provide assurance of monies allocated for future resource purchases and maintenance of current facilities. However, there was no indication at this evaluation of immediate concerns in this area.

The organisation's improvement plan and actions following the previous evaluation indicate that the organisation has shifted from a reactive stance to being proactive in identifying emerging issues or concerns. The organisation's approach to self-assessment, while having many strengths, has some potential weaknesses. For example, there were some elements of human error identified by the evaluators that could be identified internally and addressed through a more detailed process of self-review across each of the programmes and across the six key evaluation question areas.

In conclusion, Imperial is actively developing internal capabilities and policies and procedures to ensure ongoing development of robust processes to support the quality and validity of students' learning and graduate outcomes.

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 **Good.**

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

2.2 Focus area: National Diploma in Business (Levels 5 and 6)

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

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

2.3 Focus area: Diploma in Management (Level 7)

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

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

Recommendations

NZQA recommends that Imperial:

- Develop a clear set of guidelines for staff in the use of Turnitin to further build capability in plagiarism identification and in the use of Turnitin as a teaching tool to improve students' writing.
- Consider developing a wider programme review process to provide a more holistic review for ongoing improvements.
- Develop further capability in-house by involving tutors more closely in the moderation process.
- Strengthen the internal audit process for the review of compliance with the Code of Practice, for example by including specific enquiry questions and the range of evidence to be sampled.

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-quidelines-eer/introduction/.

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