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External Evaluation and Review Report

Imperial College of New Zealand
Limited

Date of report: 17 October 2018

About Imperial College of New Zealand Limited

Imperial College provides international students with a programme in English language and, until recently, business-related diploma programmes at Levels 5–7 on the New Zealand Qualifications Framework.

Type of organisation:	Private training establishment (PTE)
Location:	Level 3, Imperial House, 16 Waverley Street, Auckland
Code of Practice ¹ signatory:	Yes
Number of students:	Domestic: nil; International: seven.
Number of staff:	Four full-time equivalents
TEO profile:	<p>Imperial College has undergone many changes recently. Following NZQA monitoring and moderation of business programmes in 2016 and 2017, NZQA interventions and Imperial College management decisions, delivery of business programmes has ceased. The last cohort was transferred to another provider in June 2018.</p> <p>At the time of the external evaluation and review (EER), Imperial College was delivering an English-language programme to a small number of international students.</p>
Last EER outcome:	At Imperial College's previous EER in 2016, NZQA was Confident in the PTE's educational performance and Confident in its capability in self-assessment.
Scope of evaluation:	<p>The EER looked at the following two focus areas:</p> <ul style="list-style-type: none">• International students: support and wellbeing (because the PTE is a signatory to the Code of Practice)• Assessment and moderation across all programmes
MoE number:	7499
NZQA reference:	C33357
Dates of EER visit:	26 April 2018 and 8 August 2018

¹ Education (Pastoral care of international students) Code of Practice, 2016

Summary of Results

Imperial College is an organisation in transition. It is undertaking a major review of its purpose and direction, making decisions on what programmes will be delivered to meet the needs of its key stakeholders in the future.

Confident in educational performance

- The significant assessment and moderation problems identified by NZQA during 2016 and 2017 in Imperial's business programmes have led Imperial to cease delivery of these programmes and to confine itself for the present to an English-language programme.
- Capability in programme development will need to be further developed and strengthened if Imperial College decides to initiate new programmes, especially in the field of business.

Confident in capability in self-assessment

- The English-language programme is consistently meeting the needs of its students.
- Individual student progress is monitored and tracked through regular informal and formal testing by a well-qualified, experienced English-language teacher.
- Student pastoral care and support is provided in a safe and caring learning environment to ensure individual goals are well understood and met.
- Systematic review and monitoring processes are in place to ensure compliance with the Code of Practice.
- Based on the quality, outcomes and limited scope of Imperial's current programme, NZQA can express confidence in Imperial's educational performance and capability in self-assessment.
- Any significant change to this restricted delivery model, however, may necessitate another organisational review by NZQA.

Key evaluation question findings²

1.1 How well do students achieve?	
Performance:	Marginal
Self-assessment:	Marginal
<p>These findings place greatest weight on programmes delivered prior to this evaluation. Student numbers have significantly reduced from 477 in 2016, to 209 in 2017, to seven currently studying English language. Delivery of business qualifications has now ceased.</p>	
Findings and supporting evidence:	<p>Achievement rates in the business programmes, when they were running, were good.³</p> <p>Poor assessment and moderation practices, however, identified by NZQA have impacted on the quality of student achievement data in these programmes. For example, of 52 students who had completed all components of the level 7 programme and were required to take an additional capstone assessment⁴, 30 (58 per cent) passed, 11 (21 per cent) failed, and one (21 per cent) chose not to participate.</p> <p>By contrast, in its English-language programme, Imperial College regularly monitors student progress and achievement using initial and end-of-course testing in the four skill areas. The delivery of this programme meets industry standards, and is sustained by reliable moderation, both internal and external. At present, no comparative benchmarking information is being collected.</p>
Conclusion:	<p>Assessment and moderation in the business programmes were seriously flawed. Initiatives to strengthen practice in these areas have now been put in place. Improvements to date have been mixed (as indicated by draft external moderation figures). English-language programme achievement data, while limited in volume, is of good quality.</p>

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 Refer to achievement table in Appendix 1.

⁴ NZQA issued a compliance notice in relation to Imperial's accreditation for the Diploma in Management (Level 7) in November 2016. Imperial was required to cease enrolling new students, appoint an independent assessor, and conduct a capstone assessment to confirm that its students in that programme met the graduate profile.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>There is good evidence of valued outcomes for key stakeholders, including students and their employers. Feedback from students and some employers provides evidence of students gaining relevant knowledge and skills to prepare them for the workplace.</p> <p>In their exit interviews, 97 per cent of students describe the relevance of skills achieved as useful. A range of personal skills are gained, including teamwork, presentation skills and motivation. One hundred per cent of students stated they had developed the required work and personal skills to benefit them in the future.</p> <p>Graduates from March 2018 stated they obtained work while studying which led to full-time positions on completing study. Some students reported that they had received promotions within the first few months of their full-time employment.</p> <p>Students valued the emphasis that Imperial College placed on developing the work-ready and professional skills required for them to work in New Zealand.</p> <p>Graduate destination surveys are conducted six months after graduation. From the 2016 survey, 86 per cent have employment related to their study and were confident to work in the New Zealand context.</p> <p>All 2018 graduates have job search visas or are in employment.</p>
Conclusion:	<p>Graduate outcomes are valued by students. Data from graduate destination surveys could be analysed to gain information about the relevance and value of a graduate's skills in the workplace. Self-assessment of further engagement with other education providers, sector groups or external experts could improve understanding of the value and quality of the English-language programme outcomes.</p>

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Imperial is currently reviewing how it delivers business programmes to identify opportunities to meet the future needs of key stakeholders. Capability in programme development needs to be strengthened to address a lack of expertise in this area.</p> <p>To provide a more interactive, real-world learning experience in the business programmes, Imperial College focused on embedding case studies, work-integrated learning and involvement of industry experts.</p> <p>In response to the significant shortcomings in delivery and assessment identified by NZQA in 2016 and 2017, attempts to strengthen assessment practice and better detect learner plagiarism have been made, in association with an NZQA-approved assessment partner. Recent external moderation figures suggest that this initiative is still a work-in-progress.</p> <p>Current English tuition is delivered in a structured 12-week programme using a standard text and teaching resources with New Zealand context and content. Regular feedback on progress supports students at different levels of learning. There is no external referencing to measure if student achievement is consistent with recognised frameworks such as CEFR.⁵ Students attend well and are engaged in learning activities that enable them to practise all four English language skill areas.</p> <p>Programme reviews draw on relevant data to enable self-review, improvement and action plans. Not all programmes have been reviewed, and action plans are not yet systematically monitored.</p>
Conclusion:	<p>Strengthening of assessment has improved the validity of achievement outcomes. Programme reviews need to be completed and consistently monitored for all programmes. The use of external referencing for English language achievement would enable comparison of performance.</p>

⁵ CEFR – Common European Framework of References for Language

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Imperial College has improved processes for interviewing and enrolling students to:</p> <ul style="list-style-type: none"> • increase the emphasis on authenticity of all data within the application • verify prospective students' commitment to study in New Zealand • assist with decisions on issuing an offer of place. <p>A recent innovation has been to identify student learning goals during the enrolment process to ensure that the programme outcomes are aligned with student expectations and commitment.</p> <p>Students spoke highly of the level of individual support received from management and staff to complete their qualification (early 2018) or to successfully transfer to another provider (mid-2018) during a very difficult time for them.</p> <p>An improved orientation programme includes introduction to life and work in New Zealand, academic workshops on academic writing, referencing, plagiarism and responsibilities and accountabilities during academic study.</p> <p>Imperial College has clear processes to identify students at risk and any issues impacting on students' progress. Attendance is strictly monitored in accordance with the Code of Practice.</p> <p>Student feedback is gathered regularly. Imperial College responds to feedback through surveys, phone interviews, open-door policy, individual interviews and principal's meetings.</p>
Conclusion:	Students are well-supported from entry to exit. They have opportunities to address gaps in skills and knowledge and meet their academic and personal goals.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Governance and management at Imperial College is in transition following significant change and disruption over the past 18 months.</p> <p>Imperial College is researching and exploring innovative delivery opportunities within a sustainable business model to secure a positive future for the organisation. The possible outcomes are not yet clear.</p> <p>In response to declining numbers, new ownership and the need to improve quality, the PTE's management has reduced staff, revised the organisational structure, introduced an academic board and reactivated the industry advisory committee. It is too early to understand the effectiveness of these changes.</p> <p>Data is beginning to be used to analyse, review and inform decisions.</p> <p>Building staff capability has been a priority to ensure that the quality and design of teaching materials, delivery, assessment and review are strengthened. Current staff have the required capability, background and experience to take the organisation forward.</p> <p>Management has prioritised students during the recent retirement of business programmes. Students have been supported to complete their qualifications or transfer to other providers.</p> <p>Imperial is well-organised with good records and processes. Regular meetings are held with minutes, reports and other documentation systematically recorded and filed. A review of the quality management system has resulted in the review of some policies.</p>
Conclusion:	Imperial College is a much smaller organisation than previously. Management needs to maintain effective operational oversight that is strongly aligned to educational performance and ensure that senior management is fully engaged in self-assessment.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal.
Self-assessment:	Good
Findings and supporting evidence:	<p>Imperial College has systems and processes to review and monitor compliance with the requirements of the Code of Practice. Reviews are completed thoroughly, are genuine, and drive improvement. Agent management processes have been strengthened, with new agent contracts for on-shore agents only.</p> <p>Internal audits of student files are robust, regular and monitor the accuracy and completeness of enrolment documentation and decisions. A check of a sample of student files during the EER visit indicated that, for those students, the requirements of both Immigration and NZQA were consistently met.</p> <p>The system to check and record student attendance is closely monitored at weekly meetings.</p> <p>The process for raising concerns is transparent and students understand it. The process appears to be effective.</p> <p>A lack of understanding of the requirements for approval and accreditation of programmes has resulted in the decline of some applications.</p> <p>NZQA monitoring of the levels 5, 6 and 7 business diploma programmes identified some breaches in the quality of assessment and moderation. NZQA interventions and conditions were imposed in response to a clear breach of the Rules. Imperial Collage took steps to rectify the issues. This resulted in most NZQA conditions being revoked late in 2017.</p> <p>Imperial College understands NZQA requirements for maintaining registration and submits documentation on time. Delivery hours match the approved programme hours. Imperial College has worked hard to address the assessment and moderation breaches NZQA identified in 2016 and 2017.</p>
Conclusion:	While NZQA had identified concerns with Imperial's compliance management over the past two years, the sampling undertaken in the course of this EER indicated that core compliance processes are now being managed more effectively.

Focus Areas

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

2.1 Focus area: International students: support and wellbeing

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<ul style="list-style-type: none"> • Staff clearly understand their responsibility for the progress and welfare of the international students. Staff use a range of strategies to ensure that students have access to academic and personal support. • Feedback from students indicates that they value the learning environment. Their tutors are readily available to provide individual support when needed. • Orientation processes have been improved to include additional academic study workshops in areas such as APA referencing, academic essays and plagiarism. • Professional development workshops prepare students to work in the New Zealand context.
Conclusion:	International students are well-supported to achieve their goals, both academic and personal, and for studying and living in New Zealand.

2.2 Focus area: Assessment and moderation

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<ul style="list-style-type: none"> • NZQA monitoring during 2016 and 2017 identified variable performance in Imperial's assessment and moderation and highlighted some important areas for improvement. • Moderation by the independent assessment partner in early 2017 raised some quality issues. Imperial College has used the feedback to review and improve assessment practice. Evidence of improved moderation outcomes throughout 2017 led NZQA to revoke the condition requiring Imperial to have an external assessment partner for its business programmes. Draft national external moderation results for 2018 are mixed.

	<ul style="list-style-type: none">• Staff have undertaken professional development to increase capability in assessment and to strengthen understanding of plagiarism and strategies for detection and monitoring.
Conclusion:	Imperial College has responded positively to the assessment and moderation issues following conditions imposed by NZQA. They have sought to improve and are making some progress to strengthen the quality of assessment.

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 Imperial College of New Zealand Limited:

- Ensure that programme reviews are completed for all programmes in a systematic and timely way.
- Explore opportunities to externally benchmark and/or reference progress for English programmes to understand whether achievement is meeting expectations.
- Undertake self-assessment to explore whether relationships with other education providers, sector groups or external experts could enhance educational delivery.
- Develop and strengthen capability in quality programme development to ensure NZQA approval and accreditation requirements are well understood and met.

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.

There are no requirements arising from the external evaluation and review.

Appendix 1

Student achievement – qualification completion rates (data provided by Imperial)

National Diploma in Business (Level 5)

	2015	2016	2017
Total enrolled	69	64	25
Total completed	62 (90%)	57 (89%)	20 (80%)
Not completed	4 (6%)	3 (5%)	Nil
Withdrawn	2 (3%)	3 (5%)	4 (16%)
Terminated	1 (1%)	1 (1%)	1 (4%)
Retained in study	56 (90%)	50 (88%)	12 (60%)
Retention	95%	93.8%	80%

National Diploma in Business (Level 6)

	2015	2016	2017
Total enrolled	69	79	74
Total completed	60 (87%)	71 (90%)	60 (81%)
Not completed	2 (3%)	3 (4%)	2 (3%)
Withdrawn	2 (3%)	Nil	7 (9%)
Terminated	5 (7%)	5 (6%)	5 (7%)
Retained in study	62 (90%)	71 (90%)	62 (84%)

Diploma in Management (Level 7)⁶

	2015	2016	2017
Total enrolled	124	285	89
Total completed	122 (98%)	247 (87%)	43 (48%)
Not completed	Nil	25 (9%)	3 (3%)
Withdrawn	Nil	10 (4%)	36 (40%)
Terminated	2 (2%)	3 (1%)	7 (8%)
Retained in study	122 (98%)	272 (95%)	46 (52%)

⁶ The integrity of all the above figures is open to doubt because of the poor assessment and moderation practices discovered by the NZQA monitor visit.

Appendix 2

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](http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction) 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.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process: <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

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

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

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

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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