

Report of External Evaluation and Review

UUNZ Institute of Business Limited

Confident in educational performance

Confident in capability in self-assessment

Date of report: 9 March 2015

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Final Report

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:	UUNZ Institute of Business Limited (UUNZ)
Type:	Private training establishment (PTE)
Location:	UUNZ Tower, 76-78 Symonds Street, Auckland
Delivery sites:	As above
First registered:	18 December 2002
Courses currently delivered:	<ul style="list-style-type: none">• Master of Business Administration (Level 9)• Master of Business (Information Systems) (Level 9)• Postgraduate Certificate in Business (Level 8)• Postgraduate Certificate in Business (Information Systems) (Level 8)• Postgraduate Diploma in Business (Level 8)• Graduate Diploma in Business (Information Systems) (Level 7)• Bachelor of Information Technology (Level 7)• Diploma of Business Administration (Level 7)• Medical Registration Preparation Course (Level 6)• New Zealand Diploma in Business (Level 6)• UUNZ Diploma in Business (Level 5)• New Zealand Certificate in English Language (Academic) (Level 4)• UUNZ Institute of Business General English

(Level 4)

Code of Practice signatory:	Yes for students aged 14 years and upwards
Number of students:	Domestic: nil International: 596 students in 2013
Number of staff:	40
Scope of active accreditation:	UUNZ offers a wide range of programmes in business, information technology and general English.
Distinctive characteristics:	UUNZ offers University of Southern Queensland business and information technology postgraduate and undergraduate programmes.
Recent significant changes:	UUNZ has gained approval for two new qualifications: <ul style="list-style-type: none">• Medical Registration Preparation Course (Level 6). This is a bridging programme for non-New Zealand trained medical doctors to prepare for New Zealand registration; it has few enrolments to date• New Zealand Certificate in English Language (Academic) (Level 4). This provides entry into the New Zealand Diploma in Business (Level 6)
Previous quality assurance history:	The previous external evaluation and review in 2010 concluded that NZQA was Confident in the educational performance and Confident in the capability in self-assessment of the organisation.

2. Scope of external evaluation and review

A scoping meeting was held with UUNZ on site after reviewing information supplied by UUNZ and data held by NZQA. The two mandatory focus areas were governance, management and strategy, and international students. The three other focus areas selected and the reasons for their inclusion are outlined below

1. Master of Business Administration (Level 9) (MBA)

This qualification is a University of Southern Queensland business discipline qualification and one of the highest-level qualifications offered by UUNZ. Those enrolled made up 13 per cent (75) of the total students in 2013. The MBA was a focus area of the 2010 evaluation and it was

therefore useful to track performance and self-assessment for this programme.

2. Postgraduate Certificate in Business (Information Systems) (Level 8)

This is an NZQA-accredited qualification which was approved since the last evaluation. It is an information systems discipline qualification consisting of University of Southern Queensland papers. Students enrolled in this programme made up 4 per cent (24) of the total students enrolled in 2013.

3. New Zealand Diploma in Business (Level 6)

Business diploma students made up 36 per cent (214) of total student numbers in 2013, making it the UUNZ programme with the highest number of students enrolled. It is a national qualification on the New Zealand Qualifications Framework.

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-eeer/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 by a team of three evaluators over two and a half days. The team met with the chief executive officer, the academic manager, members of the academic board, a University of Southern Queensland representative, the two postgraduate programme leaders and teaching staff, the New Zealand Diploma in Business teaching staff, students across different programmes offered by UUNZ, the English programme leader, and administration and marketing staff. The team also reviewed a wide range of documentation and data from UUNZ and the University of South Queensland.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **UUNZ Institute of Business Limited**.

There is good evidence that the UUNZ is meeting many of the key needs of its students and other stakeholders.

- Student achievement is exemplary for two focus area programmes, but the important New Zealand Diploma in Business is achieving at a lower level. The University of Southern Queensland paper pass rates consistently exceed the average rate for the University of Southern Queensland campuses and other providers approved by the university. The average paper pass rate for the high-volume New Zealand Diploma in Business, however, just approaches the average paper pass rate reported by NZQA for all TEOs.
- UUNZ staff and students are producing research that is comparable to similar institutions. The English programme achieves strong results and supports the success of students on other programmes.
- There is some growing evidence of employment being obtained by graduates, often in sectors related to their qualifications.
- The UUNZ qualifications are well recognised. The University of South Queensland's programmes meet the requirements of Australian professional bodies, while the New Zealand Diploma in Business is a national qualification.
- The strong outcomes achieved are produced by a wide range of processes that are effective, and at times highly effective, in meeting the needs of students and other stakeholders.
- UUNZ has robust leadership which provides clear direction in a challenging operating environment.
- The PTE has recruited capable staff with appropriate qualifications, industry and teaching experience. The quality of the teaching ranges from good through to very good. Additional academic support is provided through tutors offering additional time, peer tutoring and tertiary programme support which assists students to achieve well academically.
- The centrally located building and its facilities provides a supportive learning environment. The administration team provide comprehensive and effective support to the New Zealand Diploma in Business students.

- Moderation reports for 2012 showed significant improvement in assessments over the previous years, but 2013 moderation indicated that assessments were of a low level, especially with a lack of application tasks in particular papers.

Statement of confidence on capability in self-assessment

NZQA is **Confident** in the capability in self-assessment of **UUNZ Institute of Business Limited**.

There has been a recognisable improvement in the self-assessment undertaken by UUNZ. The PTE has effective self-assessment which provides generally good-quality information that is used to guide decision-making.

- The PTE's academic council provides mostly exemplary oversight of the performance of UUNZ.
- The semester-end review of individual results for all University of Southern Queensland papers is robust; students are followed up where there are concerns, and there is evidence of a positive impact on their results. An example was the establishment of a range of additional academic support and improved results following management concerns over a particular paper. This support was subsequently rolled out across UUNZ.
- The self-assessment of the key New Zealand Diploma in Business qualification does not provide consistently high-quality information that is effectively monitored and reported to governance and management.
- An important recent initiative in 2013 was the establishment of a quality assurance role which provides a more robust and coordinated approach to self-assessment.
- An enhanced strategic business plan provides a more effective tool to monitor progress across key areas of the organisation. However, at this early stage of development there is some variability in the value and use of some key performance indicators to effectively report performance.

Findings¹

1.1 How well do learners achieve?

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**.

Student achievement is generally strong at UUNZ: two of the focus area programmes are exemplary, but the other is achieving at a lower level. The retention rate across all programmes is above 90 per cent and is improving.

Year	2011			2012		
	1	2	3	1	2	3
Semester						
UUNZ	88	94	100	94	93	85
*USQ students	89	90	88	86	91	86
Other USQ partners	88	89	86	85	90	85

Source: The table is based on USQ data analysis.
* University of South Queensland

The pass rates for the MBA for UUNZ students for 2011 and 2012 mostly exceeded the average for students from both the University of Southern Queensland and students from other approved education partners. For the same two-year period, 29 out of 33 (88 per cent) students enrolled completed the qualification.

The Postgraduate Certificate in Business (Information Systems) has only been offered since 2012, and has similar pass rates for its papers; all four students graduated. These are commendable results. There is a similar pattern for the UUNZ student paper pass rates of the other University of Southern Queensland undergraduate and postgraduate programmes. Pass rates mostly exceed the average results for other University of Southern Queensland students and partner students.

The New Zealand Diploma in Business, which has the most UUNZ students enrolled, has achieved acceptable results.

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

Table 2. New Zealand Diploma in Business, 2011-2013 (Weighted average of individual paper pass rates)			
Year	2011	2012	2013 year to date
UUNZ	74%	75%	81%
Average – all TEOs	83% ²	83% ²	83% ³ (2012)
Sources: UUNZ Self-Assessment Summary 2010 to 2013, and http://www.nzqa.govt.nz/qualifications-standards/qualifications/business-qualifications/nz-diploma-in-business/statistics/			

The average paper pass rates have been lower than the average for all TEOs during the period 2011-2013 (year to date), although steady improvement is evident. However, this positive trend needs to be set against the low level of assessment indicated in the latest round of national external moderation reports.

Some postgraduate students are gaining employment, some of them to positions of responsibility. A recent employment survey, with a response rate of 25 per cent, found 75 per cent of the 50 respondents were in work. UUNZ has been proactive and innovative in gathering and analysing data from the LinkedIn network to track graduate employment outcomes.

There are other good outcomes being achieved. Postgraduate students are producing research that has been published in UUNZ's own journal, which is also attracting papers from overseas contributors. UUNZ staff contribute papers to this and other journals. These research outcomes are good results, comparable to similar-sized educational bodies. English language students are developing their language skills and are happy with the progress they are making.

The review of learner achievement at UUNZ is effective, although there are gaps. Each semester there is a systematic review of the results of each completed University of Southern Queensland paper. Individual results are tracked and follow-up action taken with the learner as required. When a particular paper presented weaker results, an in-depth analysis took place, including a visit to the University of Southern Queensland. One action was the development of a 'tertiary programme support' initiative; results improved and this and other academic support is now offered to all students. Assessment and moderation practices are generally robust.

However, there are other areas where self-assessment is still developing. For example, formal academic achievement targets are set in the strategic plan, and

² This is the weighted average for the papers offered by UUNZ.

³ 2013 sector data and analysis is not yet available.

there are University of Southern Queensland and NZQA average benchmarks available to judge the progress being achieved. However, neither were used to review academic performance in the overarching self-assessment summary report for 2010 to 2013. There are descriptions of actions taken to improve, but no assessment of the impact of previous actions on results.

Results for the New Zealand Diploma in Business are generally improving. However, the review process is less robust than that used for the university papers. The relatively weaker performance of the New Zealand Diploma in Business programme warrants more attention. For instance, there is insufficient understanding and reporting of individual paper pass rates, including the use of clear targets and benchmarking to identify actions for improvement. In addition, there is no evidence that UUNZ has established processes for the measurement of the development of skills, attitudes and attributes by students in this programme.

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 overall value of the outcomes for students and other stakeholders is strong. UUNZ is one of the best performing and most proactive approved educational partners of the University of South Queensland, and is a valued long-term strategic stakeholder. A university representative is on the PTE's academic council and was present at the evaluation. This allows the University of Southern Queensland to monitor and actively participate in maintaining and improving the value derived from UUNZ. UUNZ students highly rate University of Southern Queensland certification and qualifications. The MBA programme, recognised by various Australian professional bodies, provides the key competencies to work in management roles within the Australian and New Zealand business sectors. Similarly, the Postgraduate Certificate in Business graduates gain recognised information technology knowledge and skills.

Feedback from students indicates that they are more satisfied with their education than students at the University of Southern Queensland and most of the other approved partner organisations. UUNZ has begun to progressively gather data on the employment outcomes of these graduates, and the limited data indicates that some graduates are gaining positions of significant responsibility. The MBA now includes business research projects, providing students with some direct business experience, and also offers local businesses some research capacity.

The non-University of Southern Queensland programmes also offer valued pathways. UUNZ offers a range of internal educational pathways to university undergraduate and postgraduate qualifications. For example, New Zealand

Diploma in Business graduates gain a recognised national qualification that pathways to University of Southern Queensland undergraduate programmes (although just 8 per cent of these graduates progressed in this way in 2013, a fall from previous years). The English programme students acquire relevant language skills and local knowledge, and nearly 17 per cent of them in 2013 progressed to UUNZ undergraduate qualifications. The New Zealand Diploma in Business graduates see significant value in the diploma to support their applications to settle in New Zealand.

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 **Excellent**.

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

UUNZ meets the key needs of its students and main stakeholders, and the few gaps are managed effectively. UUNZ adapts recognised Australian University of Southern Queensland programmes to suit the New Zealand industry context. For instance, on the MBA programme, teaching staff are familiar with New Zealand businesses and use some local case examples, and all students undertake a local research project. UUNZ programmes are also modified to meet the needs of the students. A number of effective educational support initiatives have been implemented since the last external evaluation and review. The tertiary skills programme and peer tutoring teach students academic skills, such as appropriate referencing and how to find a journal article. A business English class is provided each week. Evidence indicates that these supports have contributed to improved educational achievement.

The University of Southern Queensland students interviewed appreciated having access to online resources, which include a library, literature database, course materials and online academic support. However, these initiatives would benefit from clear objectives so that periodic evaluation could better identify how well they are meeting the needs of the students. The central location in the University of Auckland precinct in a modern building is important to the students, as are the recreation/lounge on the ground floor, free Wi-Fi (though accessibility varies) and the overall quality of the lecture rooms.

The New Zealand Diploma in Business meets the needs of the students, with three strands of specialisation offering clear pathways to University of Southern Queensland undergraduate qualifications, such as the information technology strand leading to a Bachelor of Information Technology. Many classes are delivered at night to allow students to work during the daytime.

All the students are international and many speak English as a foreign language. UUNZ helps students in a number of ways to succeed in their tertiary study. The

English language proficiency of all enrolling students is systematically assessed to identify any assistance they may need. The English language school provides programmes to prepare students for tertiary education at UUNZ or elsewhere. Close to 17 per cent of students from the English language programme in 2013 progressed to an academic programme at UUNZ. It would be valuable to track and assess how well these students were prepared for their subsequent studies.

The advisory council has the expertise, sector knowledge and representation (including student members along with management) to keep UUNZ informed of, and responsive to, the evolving needs of stakeholders. Two examples of developing initiatives are the newly approved Medical Registration Preparation Course for foreign doctors seeking to work in New Zealand, and a Master of Professional Accounting, a qualification for which UUNZ is planning to seek approval, to fill a niche for those working as accountants. It is too early to judge how well these initiatives meet identified needs.

1.4 How effective is the teaching?

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 teaching at UUNZ is effective, as reflected in the mostly strong academic results and positive student feedback. The tutors have industry experience and appropriate business qualifications, and some have considerable teaching experience. Student feedback rated the teaching staff as 'very good' to 'above average'. The postgraduate programme teaching is particularly strong, with the students gaining excellent results. All University of Southern Queensland programme tutors complete an assessed online adult teaching module, which builds their competency. UUNZ staff have or are completing a certificate in adult education. New staff are very satisfied with the induction process. The academic manager was seen as accessible and supportive. External moderation has, with one exception, been up to standard. An experienced external moderator has recently been appointed and a New Zealand Diploma in Business tutor is currently being trained in this area as a result of the external monitor's recommendations. Staff are supported to attend conferences and to undertake research.

Other elements of good teaching practice were evident. The MBA and Postgraduate Certificate in Business students receive considerable individual time and support from their tutors. Overall, the learning environment (physical facilities, classrooms, course materials and online resources) supports effective learning. Wi-Fi was installed across the whole school following student feedback, and will be upgraded in the near future.

The overall quality of the teaching for the New Zealand Diploma in Business is good, although some challenges exist. The academic results achieved, as noted,

are improving. Students surveyed and interviewed by the evaluators were mostly positive about the standard of teaching. However, there are challenges relating to the teaching staff being part-time and some on very limited hours. The tutors are qualified in their subject areas, some have enrolled in adult education training, and there is low turnover. However, the external monitor has encouraged more to undertake adult education training. There are no regular team meetings and it is difficult to schedule regular professional development. For instance, the last professional development workshop occurred in August 2013. A plan is needed to build a stronger community of practice, particularly for part-time staff.

The self-assessment of teaching is generally sound. The key data reviewed is student feedback on the tutors and the pass results of the papers taught by each tutor. An award for teacher excellence is planned based on this data. There would be some value in rating all staff and tracking their progress as a group over time.

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 **Good**.

The support and guidance to UUNZ students is very strong and most complete their academic studies. There is a comprehensive approach to the pastoral care of all the students. The Code of Practice records sighted support this conclusion. The academic manager is approachable by and supportive of students and staff. The homestay provider provides a sound service. There were instances of additional care such as a new student being walked between the campus and their home a few times. Monthly communications to overseas parents for the under 18-year-old students were very informative.

Generally, UUNZ students are more satisfied and have more student-staff interaction than students at other University of Southern Queensland sites and partner organisations. There is a clear system to monitor and keep track of learner progress for each paper. Progression is reviewed and followed up by staff at the end of every semester. Attendance is monitored four times per semester and warning letters are sent to students with attendance under 90 per cent. There was some evidence that attendance and academic results improved after close monitoring and follow-up by staff. The previously noted tertiary support programmes are another part of the framework.

The pastoral care needs of different student cohorts vary. Postgraduate students are more independent, and they valued the teaching staff regularly offering considerable extra tutoring time after classes. This mostly academic assistance was appreciated by the students – one graduate said, ‘the best thing was the tutors’. The administration staff have been given a specific pastoral role for the diploma students, as the part-time tutors are unavailable to offer full support. The

students interviewed commented very favourably on the quality of this assistance, and the high and rising retention rate supports these comments.

Other structures also provide support to UUNZ students. A number of ethnic student associations exist to support various student groups. There is student representation on the advisory council. A job club programme offers free advice and training on how to find work, and students say they would like more of this sort of assistance. There is an effective process to monitor the performance of agents, including training, ongoing review and feedback from the students.

The review of support and guidance is sound. Student feedback is sought and used to inform change, although the response rate to the survey is unclear. An independently facilitated group discussion could gain useful additional descriptive feedback. The annual review of the Code of Practice is generally robust and engaged all relevant staff.

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**.

The governance and management of UUNZ has been effective in producing generally strong and at times exemplary educational achievement. The owner-chief executive officer provides a clear long-term vision for UUNZ, with education values at the heart of the organisation. This leadership is reflected in a 'family-like' culture where people, be they staff or students, are valued. An advisory council has been created which has considerable expertise and experience of the tertiary education and business sectors in New Zealand, offering insightful strategic direction and helping ensure quality educational provision. The council, along with the management team, has provided strong guidance during a recently challenging external operating environment.

UUNZ has recruited good quality management and teaching staff. The academic manager and the two postgraduate programme leaders provide sound leadership. The University of Southern Queensland provides additional management systems to support educational achievement. There is a clear and comprehensive quality management system that helps maintain consistent performance. The administration team are professional in their responsibilities.

There are some particular challenges posed by the high number of part-time staff, in particular for the New Zealand Diploma in Business. Difficulties include maintaining a cohesive teaching team, providing sufficient professional development, and sharing organisational learning. One effective management response has been for the administration staff to provide support to the New Zealand Diploma in Business students. The high significance of this qualification,

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and the issues previously noted, warrant an increased focus from UUNZ management, including a dedicated programme leader.

A range of management processes and policies, some innovative, have been developed to support educational achievement. Improved processes have arisen from effective self-assessment taking place; tertiary programme support and peer tutoring have improved academic performance.

A recent development has been the establishment of a specific quality assurance role to provide a more coordinated and robust approach to self-assessment. A key initiative arising from this role has been the revising of the strategic business plan, which embeds the six NZQA key evaluation questions as key strategic objectives with related performance indicators. Reporting on this plan provides a more focused and useful snapshot of progress being made over time. However, there are some gaps: the quality of the indicators varies, the analysis is at times rudimentary, and few targets and external benchmarks are explicitly stated and used to rate performance. The indicators could be woven together with other qualitative evidence to enable more comprehensive judgements about performance. Some key self-assessment tasks that have previously taken place are included in this valuable integrated report used to guide high-level decision-making.

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 **Excellent**.

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

2.2 Focus area: International students

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

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

2.3 Focus area: Master of Business Administration

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

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

2.4 Focus area: Postgraduate Certificate in Business (Information Systems) (Level 8)

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

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

2.5 Focus area: New Zealand Diploma in Business (Level 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**.

The overall average paper pass rate has improved since 2011. The majority of the individual paper pass rates, while increasing, are below those reported by NZQA for all TEOs at this point. The self-assessment of this programme is supporting some worthwhile improvements. However, currently the reporting and analysis of learner achievement is variable, and remedial actions and their impact on performance are not clearly assessed.

Recommendations

NZQA recommends that UUNZ Institute of Business Limited:

1. Increase the governance and management focus on the New Zealand Diploma in Business to strengthen contributing processes to improve key outcomes.
2. Enhance the integrated strategic business plan initiative by:
 - reviewing the quality of the key performance indicators
 - better using targets and external benchmarks to more robustly assess key outcomes
 - identifying what additional (possibly qualitative) evidence is required to support sound judgement about performance
 - considering periodically rating performance using the NZQA rubrics to strengthen self-assessment and promote organisational learning.
3. Raise standard of assessment to meet moderation requirements.

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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