External Evaluation and Review Report

AGI Education Limited

Date of report: 13 June 2019

About AGI Education Limited

AGI Education Limited delivers health care and information technology programmes, primarily to international students. Enrolment for domestic students started in 2017 following funding approval by the Tertiary Education Commission.

Type of organisation:	Private training establishment (PTE)
Location:	Level 1 and 2 Chancery Chambers, 2 Chancery Street, Auckland Central
Code of Practice signatory:	Yes
Number of students:	Domestic: 17 (Māori – three; Pasifika – two; Others – 12)
	International: 175 (Pasifika – 34)
Number of staff:	23 full-time, 11 part-time
TEO profile:	See AGI Education Limited
Last EER outcome:	August 2015:
	Confident in educational performance
	Confident in capability in self-assessment
Scope of evaluation:	• Level 5 and 6 Health Care programmes (pre- and post-TRoQ qualifications)
	• Diploma in Health Services Management (Level 7)
	• International Student Support and Wellbeing
MoE number:	7682
NZQA reference:	C33772
Dates of EER visit:	19-21 March 2019

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Summary of Results

The systems and controls introduced by new management have resulted in a renewed organisational culture geared towards quality and continuous improvement. This has had a positive impact on AGI's student achievement and organisational performance. However, there are identified weaknesses in their practice which impact on the statements of confidence.

	• Overall qualification achievement is strong and above the internal benchmark of 80 per cent. Pasifika achievement[1] is also above the set internal benchmark of 70 per cent for this group of learners.
Highly Confident in educational performance	• The robust pre- and post-internal and external moderation system gives confidence in the integrity of student achievement.
	• The health care programme's balance of classroom learning and clinical placement prepares students well for employment.
Confident in capability in self-assessment	• AGI's mission is to provide 'education that builds careers'. In line with this, programmes have been developed following thorough needs analyses.
	• AGI's governance and management team has introduced systems and controls that have had a positive impact on the organisation's performance.
	• Staff feel valued and students feel supported.
	• Self-assessment practices are embedded in the organisation, and could be further improved by systematically involving all relevant staff in processes of analysis and reflection.
	• For a two-year period (2016-2018) AGI's interpretation of travel insurance requirements was at variance with a strict interpretation with the Code of Practice, and did not always cover students travelling

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[1] The Pasifika population at AGI includes both domestic and international students who are of Pasifika ethnicity. At the time of writing, all Pasifika achievement data pertains to international students. AGI started enrolling domestic students only in 2017.

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from their home country to New Zealand. This gap was self-identified and corrected by AGI in October 2018.

- Although students were potentially affected by this shortfall in coverage, NZQA acknowledges that no students were in fact harmed, and that AGI demonstrated a properly proactive approach to correcting the problem as soon as it had been identified.

Key evaluation question findings[2]

1.1 How well do students achieve?

Performance:	**Excellent**
Self-assessment:	**Excellent**
Findings and supporting evidence:	AGI's qualification achievement rate in the health care programmes is strong overall and is above the internal benchmark of 80 per cent. The Pasifika achievement rate, with a 70 per cent internal target, also shows strong achievement.[3] The newly introduced information technology programmes have a 100 per cent qualification achievement rate for the first cohort. Similarly, the first cohort of health care domestic students achieved 100 per cent qualification completions.[4] In addition to the technical and sector-specific knowledge and skills gained from the health care programmes, students gain research and academic writing skills and communication and customer service skills, which are essential in their field. Through AGI's on-site clinical laboratory and the clinical placements included in the programme, health care students gain confidence in their skills and competence to enter the workforce. AGI has developed systems to understand achievement and the skills gained by students. Students self-reflect after each module, which helps them in understanding their achievement. A student performance report is produced and a student survey is conducted after each module. The progress of students is closely monitored by the tutors, and individual learning needs are identified. AGI has strengthened moderation since the new management took over at the end of 2015. The robust pre- and post-internal and external moderation system gives confidence in the

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[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] See Appendix 1 – Table 1

[4] See Appendix 1 – Table 2

	reported student achievement.
Conclusion:	Achievement is strong, and the organisation has introduced support classes to aid students in their learning. Management and staff understand achievement by regularly monitoring and analysing data.

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

Performance:	**Excellent**
Self-assessment:	**Excellent**
Findings and supporting evidence:	AGI conducts graduate destination surveys which confirm that the majority of the level 5 and 6 graduates are employed in the health care sector in their relevant fields (84 per cent and 97 per cent respectively). A large number of level 5 graduates progress to level 6 as part of a two-year pathway programme, hence the lower employment rate compared with level 6. The data compiled by AGI is detailed in that it includes the employer and position and employment status (i.e. part-time or full-time) of the graduates. This supports the PTE's understanding of relevant graduate destinations.

Among the level 7 graduates, 31 of 32 respondents are employed in the health care sector.[5] The majority are employed in health care administrative roles (human resources, facilities, operations) and as health care assistant coordinators, while two are employed as caregivers. Students understand that, as in other industries, management positions require experience. The level 7 qualification provides them with the skills and knowledge, and particularly the pathway to be eligible for supervisory and management positions in the future. The graduate survey is sufficiently comprehensive to show whether the competencies obtained in the level 7 programme are being used in the workplace. It confirmed that graduates are applying the programme competencies in the workplace.

AGI collects employers' feedback to evaluate the effectiveness of its programmes in meeting the needs of the health care industry. The employers' feedback also confirmed that AGI graduates have the skills and competence for employment in |

[5] There are no domestic students in the level 7 programme, hence this data only pertains to international students.

	health care.
Conclusion:	Through its self-assessment practices, AGI ensures that students obtain the skills and competencies to make them employable in the relevant industry.

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

Performance:	**Excellent**
Self-assessment:	**Excellent**
Findings and supporting evidence:	Staying true to their mission of 'education that builds careers', AGI's programmes have been developed following thorough needs analyses. Programme review is regular to ensure continued relevancy, which is confirmed by feedback from clinical placement partners and employers in the sector. Regular contact with the placement partners – and evaluation at the end of the placement – informs programme reflection, as does tutor and student feedback.

The health care programmes comprise classroom learning and an on-site clinical laboratory, and clinical placement/related learning experience. Learning activities are structured, including the self-directed learning. Placements are valuable to the students' learning and provide networks for employment. Placement partners acknowledge the benefits for both parties of these relationships.

AGI has robust processes and controls to protect academic integrity (i.e. moderation, plagiarism policy, resubmission policy, the use of plagiarism-detection software and Moodle, the student disciplinary committee). The panel of external moderators has been selected on the basis of subject matter expertise and includes academics and industry people, whose various backgrounds and perspectives contribute to the robustness of the process.

AGI established a Māori advisory committee in its endeavour to incorporate Te Ao Māori into the programmes. For international students, the programmes include understanding New Zealand and Māori culture and how health care policies and practices reflect needs. Marae visits and learning basic Te Reo and Tikanga Māori are part of this familiarisation for international |

	students.
	AGI takes into account the culture and needs of its Pasifika cohort in programme delivery and review.
Conclusion:	AGI's robust self-assessment practices ensure that programme design and delivery, as well as learning activities, address the needs of the students, clinical partners, relevant employers and other stakeholders.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	AGI provides various ways of supporting students, not only in their learning but in other aspects of their lives.
	Structured support classes, which include academic writing, APA referencing and health care-related practical knowledge (e.g. first aid and hoisting) are offered on a regular basis. These workshops complement students' learning, and in most cases assist them in meeting the programme requirements. Furthermore, the skills learned are not only useful in the classroom but also in further study or employment.
	AGI provides extra classes to students who may need additional support. Attendance is optional for these support classes, although some students are required to attend if needed.
	Support for students in their clinical placements is provided by the placement coordinator and the clinical tutor, with the latter visiting the students once a week in their placement. A comprehensive orientation is provided to students prior to the placements to make them aware of all requirements, especially the relevant health and safety policies.
	AGI has a student disciplinary committee which deals with student issues such as plagiarism. The committee's main purpose is to provide discipline as well as support to students to complete their studies.
	Students feel supported and listened to. The learning environment is inclusive given the organisation's various cultures. Class representatives have monthly meetings with the

	programme leaders. The programme leaders and tutors are available for consultation and are approachable. Feedback is provided in a timely manner, and identified gaps are addressed immediately through the support classes.
	Student welfare officers are available to both domestic and international students for assistance in non-academic matters. Their engagement with the students is mostly informal (i.e. morning chats) and in response to learners' queries and issues rather than through a process to proactively engage learners in a systematic way.
	On one occasion, an AGI tutor asked a small group of students to sign a waiver when conducting field research. The intention of the waiver – which states that students waive any or all actions, claims or demands against AGI should they suffer injury or damages – is not in line with the intent of the Code of Practice.[6] However, this practice, which has now been stopped, was an outlier and had minimal impact on student welfare. How.
Conclusion:	Students feel supported in their learning through the various systems put in place by AGI. The organisation's self-assessment practices could be further improved by including the effectiveness of student support in the analysis.

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

Performance:	**Excellent**
Self-assessment:	**Excellent**
Findings and supporting evidence:	Since taking over the business in 2015, AGI's new management has introduced a number of systems and controls which has resulted in a renewed organisational culture geared towards quality. The 'three lines of defence' established by the president/academic director – wherein all data and information goes through the tutor, the programme leader and the quality assurance officer before reaching the president's desk – ensures quality of data and a sense of ownership by all staff, and that the institution can effectively operate in the absence of the president.

The quality management system is regularly updated to reflect |

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[6] The Education (Pastoral Care of International Students) Code of Practice

	practice. Amended policies in regard to moderation, resubmission and authenticity of assessment have been introduced to improve learner educational performance and integrity of achievement.
	The new management has invested heavily in learning resources and facilities, which contribute to students' engagement in their learning. The new clinical laboratory, where students practise and become familiar with clinical facilities and equipment, gives them confidence when they go into real workplaces for placements.
	Academic leadership is strong and effective. The academic director, who is also the president, engages closely with staff and seeks external advice to improve quality. Management believes in continuous improvement and this ethos is reflected in how the organisation operates on a daily basis.
	Innovation and improvement are constantly sought through needs analysis. AGI collaborated with another PTE to deliver the Competence Assessment Programme (CAP) for overseas-trained nurses, which will fill the rising demand in the country for more registered nurses. AGI's application to deliver CAP is currently in progress.
	The academic advisory committee is voluntary and independent, and composed of experienced people in various fields (i.e. education, business, health care, strategic management). Their involvement in AGI is not limited to academic matters, but also includes providing independent perspectives to the operation of the PTE as a whole.
	Staff are well qualified and feel valued in the workplace. All teaching staff have adult education qualifications or are planning or in the process of gaining them. Management is approachable, open to suggestions, and supportive of staff personal and professional goals.
Conclusion:	Management is effective and drives the culture of quality at AGI. The new systems and controls support educational achievement. Continuous improvement is evident in how AGI operates.

1.6 How effectively are important compliance accountabilities managed?

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	AGI is mostly managing its compliance responsibilities well.
	Programme delivery, including the required number of learning hours, meets qualification requirements and matches the NZQA approval.
	The moderation system and practices are robust and comprehensive. Moderation results are generally positive, and the concerns identified are immediately addressed. For instance, when a gap is identified following moderation, the next assessment round will be amended or new systems introduced as required to address the gap.
	AGI conducts annual self-assessment of its responsibilities as a Code of Practice signatory. This exercise could be improved to enhance the active role of all relevant staff, and could be approached in a more reflective manner to understand how well AGI meets the Code outcomes. In the first two years of the new management, AGI did not meet the Code's insurance requirements covering international students' travel to and from New Zealand. AGI identified this gap in 2018, which shows effective self-assessment.
	Agents are closely monitored to ensure they are abiding by the requirements of the Code. Agent agreement documents were amended to clarify expectations for both parties. This is one of the controls put in place by management to monitor and improve the PTE's Immigration New Zealand visa approval rate. A Mumbai office has been established where introductory meetings and students' applications for enrolment take place.
Conclusion:	AGI mostly manages its compliance responsibilities well and immediately acted on gaps in compliance identified through its own self-assessment. The gap in the insurance coverage lasted longer than desirable, but has now been satisfactorily addressed.

Focus Areas

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

2.1 Focus area: Level 5 and 6 Health Care programmes (both old and new qualifications)

Performance:	**Excellent**
Self-assessment:	**Excellent**

2.2 Focus area: Diploma in Health Services Management (Level 7)

Performance:	**Excellent**
Self-assessment:	**Good**

2.3 Focus area: International Student Support and Wellbeing

Performance:	**Good**
Self-assessment:	**Good**

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 AGI Education Limited:

- Engage with international students on a regular and structured basis to understand the effectiveness of the student support system.

- Conduct structured and purposeful meetings for staff responsible for the pastoral care of international students (i.e. student welfare officers, chief operating officer) to ensure an aligned understanding of concerns with regard to international students.

- Involve all relevant staff in the self-assessment exercises and approach self-assessment in a more reflective manner (rather than as an audit) to understand what works well.

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

Table 1.

Qualification completion rate for AGI healthcare programmes							
Level 5	**2015**		**2016**		**2017**		**2018**
	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion
Domestic	0	0	0	0	0	0	0	0
International	72	64	101	91	78	70	33	28
Pasifika	20	19	11	10	11	8	15	11
Level 6	**2015**		**2016**		**2017**		**2018**
	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion
Domestic	0	0	0	0	0	0	0	0
International	56	56	45	43	58	56	50	47
Pasifika	2	2	2	2	5	5	6	6
Level 7	**2015**		**2016**		**2017**		**2018**
	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion	Total number of students	Qualification completion
Domestic	NA	NA	NA	NA	0	0	0	0
International	NA	NA	NA	NA	31	31	36	35
Pasifika	NA	NA	NA	NA	0	0	4	3

The last intake considered for the above data was November 2017. The first domestic student at AGI started in February 2018, and was not part of this data.

Source: AGI Self-Assessment Report (page 20)

Table 2. Qualification completion rate for the first cohort of health care domestic students

Number of domestic enrolees	Intake	Completion date	Completion rate
2	Feb-18	Dec-18	100%

Source: AGI

Appendix 2

Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

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

- *Identify organisational fraud[7]*

- *Provide comprehensive coverage of all programmes within a TEO, or of all relevant evidence sources*

- *Predict the outcome of other reviews of the same TEO which, by posing different questions or examining different information, could reasonably arrive at different conclusions.*

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[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.

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Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.

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

maintaining accreditation to provide an approved programme for all TEOs other than universities, and

maintaining consent to assess against standards on the Directory of Assessment Standards for all TEOs including ITOs but excluding universities, and

maintaining training scheme approval for all TEOs other than universities.

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.

In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 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, training schemes and consents to assess and registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016. 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). All rules cited above are available at https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/, while information about the conduct and methodology for external evaluation and review can be found at https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/.

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