

Report of External Evaluation and Review

Thoughtplanters Limited

Confident in educational performance

Confident in capability in self-assessment

Date of report: 16 December 2014

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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:	Thoughtplanters Limited				
Туре:	Private training establishment (PTE)				
Location:	145 Dominion Road, Mt. Eden, Auckland				
Delivery sites:	Training is delivered on training sites throughout New Zealand.				
First registered:	12 September 2008				
Courses currently delivered:	 Telford Foundation Certificate in Arboriculture (Level 2) 				
	 National Certificate in Arboriculture (Level 3) 				
	 National Certificate in Arboriculture (Level 4) 				
	 Short courses (training events) of one to three days' duration for core generic agricultural and horticultural unit standards 				
	 Short course 'refresher' training for employees in the electricity industry 				
Code of Practice signatory:	No				
Number of students:	Domestic: 61 Telford students enrolled in national certificate courses				
	Approximately 200-250 short courses (described as 'training events', with 12-15 students each) are delivered annually. The same students may enrol				
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	in multiple courses depending on their programme during the year.			
Number of staff:	Four full-time equivalents			
Scope of active accreditation:	Telford Foundation Certificate in Arboriculture, (Level 2)			
	A training scheme, <i>Insulated tool zone vegetation control worker (Close Worker)</i> , was approved in June 2014, but is not currently being delivered.			
	Consent to assess:			
	Subfields: Agriculture, Forestry and Fisheries – Horticulture; and Agriculture, Forestry and Fisheries – Primary Sector			
	 Electricity Supply Core Skills domain – 17 unit standards (relating to safety, pruning near power lines, supply networks and compliance) 			
	 33 level 2 and 3 unit standards from the Interpersonal Communication, Communication Skills, Forest Operations, Occupational Health and Safety, and Agricultural Vehicles and Machinery domains. 			
Distinctive characteristics:	Thoughtplanters Ltd is a national and international provider of arboriculture training. Board members and management are members of national and international associations such as the New Zealand Arboricultural Association (NZAA) and the International Society of Arboriculture (ISA).			
	Thoughtplanters delivers training nationally under contracts to the Telford Division of Lincoln University and the Primary Industry Training Organisation. It is a registered training organisation in Australia and also provides training for the Singapore Workforce Skills Qualifications agency.			
	Thoughtplanters also delivers non-NZQA accredited short courses to companies on request. These short courses cover a range of topics.			
	In New Zealand, students are enrolled with the			

	contracting tertiary education organisation (TEO) and referred to the PTE for either whole qualification or short course training. Assessment results are reported to NZQA by Telford or the relevant industry training organisation (ITO).
	Training is delivered in training locations throughout New Zealand by a team of 12-15 contracted trainers.
Recent significant changes:	Thoughtplanters reviewed and changed its business model in October 2013 in response to changes to funding and the mergers of the former Agriculture and Horticulture ITOs into Primary ITO. Administration and most of the management team were moved to Auckland, and all full-time trainers became sub-contractors. The formation of Primary ITO has enabled the PTE to expand its training partnership with the former Horticulture ITO to include standards common to the agricultural and horticultural sectors. The PTE now delivers generic land-based theory training to students enrolled for a number of qualifications in those sectors.
	Sectors.
Previous quality assurance history:	Thoughtplanters Ltd was last externally evaluated by NZQA in 2011. NZQA was Highly Confident in the organisation's educational performance and Confident in its capability in self-assessment.
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	Thoughtplanters Ltd was last externally evaluated by NZQA in 2011. NZQA was Highly Confident in the organisation's educational performance and Confident in its capability in self-assessment. The PTE did not meet NZQA external moderation requirements for the Core Skills unit standards 1277 and 1312 in 2012-13, and modifications to the assessment materials were recommended. Resubmission was not required, and NZQA noted

has recommended better use of supporting evidence from the workplace in ongoing assessment practice.

Primary ITO conducted on-site moderation in 2012-13 and verified assessment decisions.

The academic manager attends regular meetings of the Telford Division Teaching Committee, which monitors student progress and assessment and moderation activities. The PTE submits an Annual Programme Review (APR) on each programme to the Telford Division Teaching Committee.

Telford also conducts moderation on site.

2. Scope of external evaluation and review

The focus areas selected were:

- Governance, management and strategy (this is a mandatory focus area.)
- Telford Foundation Certificate in Arboriculture (Level 2), and two unit standards-based training events for unit standard 22177 *Demonstrate knowledge of the structure and function of plants*, and unit standard 22174 *Demonstrate knowledge of soils and fertilisers*. The foundation certificate is the PTE's largest programme, delivering a complete qualification. First delivered as a pilot in 2011, it introduces first-job seekers to the industry and leads to the apprenticeship level 3 and 4 arboriculture qualifications. The two unit standards were selected as they are part of the contract with Primary ITO and highlight the performance of the PTE in relation to the single training events, of which there are many.

3. Conduct of external evaluation and review

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

The external evaluation and review (EER) was conducted by two evaluators over one and a half days at the Auckland office of Thoughtplanters. It included discussions with the following staff and stakeholders:

• The Board

- Management team and academic manager
- Three trainers
- Three current students in the foundation certificate programme
- Three employers of graduates and current students.

Before the EER visit, the evaluators reviewed a range of documentation, such as the business and strategic plan, moderation reports and self-assessment reports. Key stakeholders, such as Primary ITO, Telford Division and Lincoln University, were consulted. Documentation relating to completions data and meetings of the Board, management and trainers was reviewed on site, along with course materials, assessments and moderation reports.

Summary of Results

Statement of confidence on educational performance

NZQA is Confident in the educational performance of Thoughtplanters Limited.

Thoughtplanters is recognised by the industry and other providers as a specialised niche provider of training to the arboriculture and related horticulture industry sectors. It has extensive national and international links with the industry, which the PTE uses to ensure the currency and relevance of training.

- The PTE has a well-structured governance and management group and a clear direction and purpose which support the training programmes. It manages training partnerships with other providers and major companies very well, leading to positive outcomes for all stakeholders.
- The PTE consistently meets, or exceeds, targets contracted through its partnerships with other TEOs. It has a 90 per cent completion rate across all courses that contribute to the Telford qualification programmes and to Primary ITO's off-job training.
- The value of the training is excellent. According to employers, the training contributes to a skilled and knowledgeable workforce and to improved individual performance in the workplace.
- There is a current shortage of skilled arborists. Completion of the foundation certificate programme leads to apprenticeship level 3 and 4 qualifications and contributes to closing the skills gaps at the higher levels
- The generic land-based knowledge courses are relevant to a number of sectors within the arboriculture and horticultural industries, and lead to a range of qualification pathways for students in these sectors.
- Training is delivered by experienced trainers who are expert in their areas of delivery. They are well supported by PTE management.
- The PTE has good academic monitoring processes to ensure the quality of training. However, the evaluators identified some gaps in the collation and analysis of information relating to the needs and achievements of different stakeholder groups.

Statement of confidence on capability in self-assessment

NZQA is **Confident** in the capability in self-assessment of **Thoughtplanters** Limited.

The Board of Thoughtplanters is proactive in establishing its business direction and responding to stakeholder needs, using its close connections to the industry and understanding of training priorities. The Board sets coherent policies for the organisation and regularly monitors them.

- Management and trainers systematically monitor the TEO contracts and review the completion rates of the qualification programmes and training events. This helps them to maintain the quality of delivery, and quickly identify and resolve any issues with training practice.
- The student evaluations are discussed in weekly team conferences and in meetings with trainers. Reports show that the PTE is responsive to issues relating to delivery and assessment.
- Internal and external moderation leads to improvements in assessment practice and changes to resources.
- However, there is room for improvement in the PTE's self-assessment and its understanding of the educational or employment outcomes of all stakeholder groups and its own educational performance. A better understanding of the needs of priority groups would help the PTE understand how well its goals for individual learner groups have been met.
- Stakeholder feedback is mostly informal and forms a large part of the review of courses. However, processes to more effectively capture and analyse the feedback would help identify future trends or any issues with the current programmes.
- The issues with the student management system highlighted in the 2011 EER report have yet to be resolved. A review of the system's capability to produce reports and collate information for an analysis of the training outcomes is needed.

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 **Good.**

Student achievement rates across all courses are high, with an average completion rate of 90 per cent. The PTE provided evidence that the contracted course and qualification completion targets for the Telford programmes and Primary ITO have been met.

Only a few students withdraw from the foundation certificate programme, and this tends to be employment-driven.

Results for students completing the Telford Foundation Certificate in Arboriculture showed an improvement in completions from 2011-13. The programme was run as a pilot in 2011.

In 2014, the PTE plans to deliver a maximum of eight courses. In consultation with industry, it was determined that this matched the demand for training and the employment opportunities for graduates.

Table 1. Completions of the Telford Foundation Certificate in Arboriculture (Level 2).

2011-14						
Year	2011	2012	2013	2014		
No. of students	19	121	148	51		
No. of courses	1	9	15	8 planned		
Nos. (and %) completing	15 (79%)	92 (77%)	126 (85%)	46 (91%)		

Note: the 2014 information is correct up to the date of the EER report.

The foundation certificate programme is targeted at the youth sector, and completion provides graduates with a pathway to the apprenticeship level 3 and 4 arboriculture qualifications. In 2013, 95 per cent of graduates progressed to the National Certificate in Arboriculture (Level 3).

Most students are already employed in the arboriculture and related horticultural industries. Companies use the foundation certificate programme as pre-

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

employment training. Feedback from employers, trainers and students showed that as well as an introduction to the arboriculture industry, students gain basic employment skills, improved confidence and introductory land-based knowledge transferable to a range of occupations.

Courses (training events) delivered for Primary ITO are based on single unit standards generic to the horticultural and agricultural qualifications for which students are already enrolled. The PTE may deliver between 200 and 250 of these courses each year. Data supplied for the two courses² with the highest number of students shows overall high levels of achievement for the years 2011-2014 (ranging between 90 and 100 per cent).

The PTE has good academic processes for monitoring student achievement. The PTE provided evidence to show that any problems are identified and quickly followed up.

The academic manager attends the Telford education committee, and the APRs show completion data, issues with the training, and any recommendations for changes.

Regular internal and external moderation validates student achievements. There are, however, gaps in the PTE's understanding of how well different groups of students achieve. The collation of course pass rates provides the PTE with good information about overall completions, but it does not currently differentiate the educational or employment outcomes of all stakeholder groups and its own educational performance with regard to each. It does not, for example, capture achievement data on Māori and Pasifika students, youth or employees of major companies. No graduate destination data was available for the students completing the sub-contracted Telford programmes. Given the skills gaps in the industry, information about employment trends over time, and assist with long-term planning.

The PTE attributes this lack of tracking and analysis of data for different stakeholder groups partly to the fact that it does not enrol the students or directly process results. The evaluators accepted that tracking progress or completion of qualifications for students enrolled with another TEO is not always possible, but considered that the PTE could better use the information it does have for selfassessment purposes, including the informal sources of information about stakeholders that can be shared and used in planning.

² Unit standard 22174 *Demonstrate knowledge of soils and fertilisers*; and unit standard 22177 *Demonstrate knowledge of the structure and function of plants*.

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.**

The value of the outcomes for Thoughtplanters' stakeholders and students is high. This is shown by the consistently positive feedback from employers, students and trainers about the impact of the foundation certificate programme especially, on improved workplace performance and the opportunity it provides for entry to higher qualifications. The high completion rates for all programmes are of value to all stakeholders, as they indicate the increased numbers of graduates and potential employees who have achieved recognised industry standards and qualifications.

The PTE has an increased demand for its training, particularly the foundation certificate, which has the highest number of enrolments. Evidence from documented and informal sources shows that employers value the skills, industry knowledge and improved confidence that employees bring to the workplace. Two employers discussed the fact that several of their employees have been enrolled in the PTE's programmes since 2012 and thought that the progression of external training and mentoring of students by the PTE's trainers supported the employer's own on-job skills training. Having completed the foundation certificate, these employees are now enrolled to complete the level 3 and level 4 arboriculture qualifications.

Employers and students benefit from training that is current, delivered by trainers who are recognised industry experts, and supported by a management group that is closely connected to the arboriculture industry. The PTE's programmes are valued by Primary ITO and Telford, who commented on the open and constructive relationship with the PTE, their continuous improvement of courses and their expertise as specialised trainers of arboriculture.

All students participate in end-of-course evaluations. They reported consistently high levels of satisfaction with the training, the feedback from trainers, and the value to them of their achievements for current and future employment or further training.

Individual student feedback for each course, and programme reviews for Telford, provide good information about the value of graduate outcomes. However, this information is not collated and analysed across programmes. The PTE's overall strong performance and value need to be validated by insights into the value of the training to individual stakeholder groups and communities, as noted in section 1.1 of this report.

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 **Excellent.**

Thoughtplanters is a national organisation delivering training courses to meet a significant need for skilled workers across the arboriculture and related industry sectors. It provides training that is flexible and suits the needs of other TEOs, employers or a region. This was evident in the number of regional courses being delivered and the number of regional trainers available.

The PTE has strong training partnerships with major employers, meeting their needs for pre-employment and apprenticeship training and a range of other skills training that includes safety compliance, electrical hazard awareness and line clearance, and generic horticulture.

The foundation certificate is a 40-credit holistic programme with 'crossover' generic components relevant to a wider range of horticulture careers besides arboriculture. Students attend an initial three-week, full-time course, followed by 10 weeks of field work either as an employee or as an intern (at a golf course for example). The PTE helps students find employment where needed to complete the certificate, but most students are already in employment.

The model for all training events (developed in consultation with industry stakeholders and training partners) includes one to three-day courses with a mix of off-job theory and practical skills training that suits employers' work schedules, as well as the students'. Developed by subject experts, the materials have embedded literacy levels, and include activities to engage students (such as quizzes). They also incorporate current codes of practice and, as such, meet the needs of all stakeholders for skills training that is up-to-date with new techniques and technological changes. The materials are version controlled, regularly reviewed and updated, and available online. The quality control of resources contributes to the consistency of training delivery across regions and trainers.

Feedback from programme evaluations and interviews with employers and students is positive, and confirms that the courses and activities match their needs. The 2013 APR report to Telford on the foundation certificate also reports on the overwhelmingly positive feedback from employers about the skills of graduates. This feedback was the reason the PTE offered this programme in greater numbers to meet demand in 2013.

The evaluators found strong evidence from a number of documented and informal sources that the PTE understands the needs of stakeholders, including those of their training partners, and uses this information to make changes or improvements to programmes or the overall direction of the PTE. This was evident in the PTE's *Final Report*

quick response to the need for changes to materials or assessment, the decision to restrict delivery of the foundation certificate programme to a more sustainable number of courses per year, and (in partnership with the Primary ITO) to expand the scope of delivery to include generic land-based theory standards that underpin a range of horticultural and agricultural qualifications.

1.4 How effective is the teaching?

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.**

Trainers are recognised as experts in their different fields, and their effectiveness is based on their current practice in the industry and/or years of prior experience. The small size of the organisation facilitates the sharing of information and expertise among trainers and the academic manager and improves their collective knowledge of resources and training practice. Trainers also meet regularly (by Skype or conference call). The minutes of these meetings show that trainers respond quickly to student issues and identify any delivery and assessment activities that need improvement.

All trainers have completed the National Certificate in Adult Literacy and Numeracy Education (Vocational) (Level 5) and this helps them explain complex information to students and assist with literacy needs. Trainers are currently completing an Australian Professional Development Certificate - Vocational Training along with the trainers in the PTE-owned Australian enterprise. Some trainers are also ITOregistered assessors.

The high completion rates are an indicator of the dedication, expertise and effectiveness of the trainers. Course evaluations and the evaluators' interviews with the students confirmed the high levels of satisfaction with the way the training is delivered. Employers attributed the successful outcomes of the foundation certificate programme to the small class sizes (which encourage learning), the mentoring of students and the fact that trainers are able to able to explain concepts, and the focus on key knowledge with examples where needed (e.g. safety) from a practitioner's perspective.

Students on the Telford programmes have training resources that include work log books for recording practical task completion, intended for verification by on-site supervisors. However, there appeared to be some confusion among trainers and employers about how these logs contribute to the final sign-off of competence and who is providing the verification. The PTE is consulting with Primary ITO about assessment practice, which is intended to clarify and modify workplace assessment resources and practice.

Students as ITO trainees are assessed in the workplace by ITO-registered assessors. Primary ITO uses the expertise of the PTE's trainers at times. This *Final Report*

recognises the value of the experience and knowledge of the PTE's trainers to other providers in assessing against industry standards.

The PTE's self-assessment of teaching effectiveness is comprehensive. It links the trainer feedback, trainer appraisals, academic monitoring, and overview by the PTE Board with the analyses contained in the Telford APRs. Course results are regularly monitored and any drop-off to below the expected high targets leads to a review of training practice. Course pass rates for each trainer are monitored. These are consistently high, which is an important indicator of training effectiveness for an organisation with a geographical spread of trainers and training.

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.**

Students receive good information and advice when they attend their training, and those interviewed from the foundation certificate programme said they were clear about the unit standard outcomes and what they needed to do for assessment. They understood key elements of work-readiness, such as safe work practices, and thought that the training was very helpful in gaining employment.

The high levels of student support from the dedicated trainers lead to high levels of satisfaction with the training, as noted in the course evaluations and reflected by the feedback from employers. Trainers are responsive and knowledgeable. Their qualifications and adult literacy training enables them to provide learning assistance as needed. Reader-writers are available for students who need help. Both Telford and Primary ITO students have access to the guidance and support provided through the respective organisations. Only limited individual face-to-face guidance and support can be provided because the training is delivered over one to three days. However, there was evidence from the course evaluations and weekly team conferences to show that the trainers maximise the contact time with students, identifying learning and assessment issues and discussing solutions. The PTE informs its training partners on a regular basis of any issues that need to be followed up by them.

The tracking of student progress has improved, and both students and trainers can easily access information about individual progress. Feedback on assessment is timely.

The PTE's self-assessment of its student guidance and support relies on the course evaluations, weekly team conferences and substantial amount of informal feedback from employers and students. As the PTE's regional delivery expands, the PTE may need to review the support and additional resources both students and trainers may need in the many training locations. This is linked to the review of the PTE's student management system. *Final Report*

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

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.**

The clear strategic vision and purpose of the PTE has been established by a wellstructured governance and management group. The PTE's objective is to be a national organisation with regional response capabilities. This is its point of difference, and makes it the provider of choice for training for the arboriculture and related industry sectors. The key features of the PTE's training philosophy include the incorporation of industry knowledge from its national and international connections into the training, and a flexible delivery model supported by expert trainers and quality training resources. Evidence was provided that the PTE is successful in meeting its aims, as noted in other sections of this report. The PTE manages its training partnerships well.

Governance of the PTE is effective in supporting educational achievement. The five-member Board, which includes industry leaders and members of the PTE management team, has set coherent policies and standards for the organisation that contribute to the positive outcomes for stakeholders noted in this evaluation. It has a strategic business plan that sets the direction for the next three years and meets regularly to review the direction of the PTE and progress towards contracted training targets.

The PTE has responded to the challenges arising from ITO mergers and funding changes leading to an expansion of training delivery and consent to assess. These processes have been well managed, balancing innovation with continuity of training provision. This has consolidated the PTE's position to the point where it can consider a longer-term three-year plan with one of its training partners.

The Board and management understand the need to diversify. The PTE participated in the Targeted Review of Qualifications for horticulture (including arboriculture), is aware of potential changes to national standards and qualifications, and has the capability to develop new programmes. The PTE's business plan identifies major companies that may need their services, highlighting areas for further development such as being the preferred provider for line clearance training and other courses related to compliance and new codes of practice.

The PTE actively markets skills and qualifications through its industry connections, and trade magazines. It promotes training through competitions, such as the New Arborist of the Year (since 2012), and organises sponsorships for industry get-togethers to increase awareness of the training and the need for skilled workers. In

this way, the PTE contributes to a greater awareness of the industry and the training and employment opportunities within it.

The PTE has issues to resolve with its student management system, as noted in the previous EER report. Its reporting system is inconsistent with the reporting timeframes of one its training partners and leads to discrepancies in the data reported. Information that may be available for collation and analysis is not used or shared to better understand student outcomes.

As noted in other sections of this report, the PTE needs a better understanding of all stakeholder groups to be able to assess their needs and develop training solutions. It needs better information that tracks achievement over a period of time for different groups and programmes. While its monitoring processes maintain the quality of programmes, the PTE's self-assessment practices do not currently allow the organisation to comprehensively identify how well it is achieving its goals, particularly around sustaining educational achievement.

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: Telford Foundation Certificate in Arboriculture (Level 2); training events for Primary ITO

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

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

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-andreview/policy-and-guidelines-eer/introduction/.

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