

# Report of External Evaluation and Review

Industry Training Works Limited

Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 19 December 2012

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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:	Industry Training Works Limited (ITW)
Type:	Private training establishment (PTE)
Location:	6 Hall Road, Ngongotaha, Rotorua
Delivery sites:	Course delivery is from various sites to suit central North Island clients.
First registered:	28 August 2009
Courses currently delivered	There are no approved programmes listed for this provider. Courses are made up of unit standards to suit individual clients' needs.
Code of Practice signatory	No international trainees
Number of students:	Various trainees in small classes (below 15) at various times, as the need for training arises.
Number of staff:	The manager teaches when required; two or more trainers are contracted as needed.
Scope of active accreditation:	A large scope of domains and unit standards up to and including level 6 in a variety of trades training areas with a focus on health, safety, and emergency management.
Distinctive characteristics:	ITW is a small PTE, owned and governed by an umbrella company called Emergency Management Solutions which engages in health, safety, and emergency consultancy and works closely with a large wood product company at its Kinleith plant.
Recent significant changes:	Moves are currently being made to reabsorb ITW, the training arm, back into the main infrastructure of Emergency Management Solutions.

Previous quality assurance history: This external evaluation and review (EER) visit is the first for this provider. NZQA has conducted annual Tertiary Assessment and Moderation (TAM) checks of sampled unit standards. ITW has not established a good record with TAM, and this deficiency has caused the selection of moderation as a focus area for this EER visit.

## 2. Scope of external evaluation and review

The scope of the EER included:

- Governance, management, and strategy
- Training courses based on unit standards
- TAM moderation issues.

## 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.*

An NZQA lead evaluator conducted the evaluation visit with an external lead evaluator over one day at the ITW Ngongotaha office. The evaluators met with the founding directors, general manager, contracted training staff, and the administrator. Some employers, ITO representatives, and past trainees were interviewed by telephone.

A number of documents were studied by the evaluators during the visit and this has helped to validate the information that was heard in the interviews. Documentation included feedback from trainers reflecting on each course as it finishes, feedback from trainees, curricula vitae from the trainers, ITO moderation reports, NZQA reports on the moderation of unit standards, the electronic trainee database, trainees' workbooks for some unit standards, folders of course organisation documents, completed assessment scripts, internal moderation forms, directors' meeting minutes, and other items of substantiating evidence.

# Summary of Results

## Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **Industry Training Works Limited**.

ITW is a small provider which is an integral part of its umbrella company, Emergency Management Solutions. The latter is the provider of 24-hour emergency response and security services on site at New Zealand's largest wood product manufacturer at Kinleith and provides training to the staff of other companies in the area of emergency response.\* Emergency Management Solutions has a good relationship with its clients, has a sound financial basis, and has a good reputation in the industry. The training arm (ITW) has been registered with NZQA since 2009 and operates when required, offering short training courses specifically designed for clients' needs. The courses are made up of a small number of unit standards which can be used towards national qualifications. ITW does not itself offer approved programmes at this point. The NZQA evaluators were told that ITW is 'still a work in progress'. ITW offers flexibility in its ability to facilitate training at the client's workplace and to tailor courses specifically to suit the client's requirements.

ITW courses have an achievement rate of around 95 per cent, which is verified by the reporting of results to NZQA, but trainee achievement is not specifically analysed at present. Only a few trainees do not complete or do not achieve each year. These trainees are not specifically tracked. As much as possible, ITW uses teaching material and assessments that have been developed and moderated by industry training organisations (ITOs), and this standardises the teaching and minimises the need for assessment staff to have superior writing skills. Trainees surveyed by phone expressed satisfaction with the courses they attended.

The part-time contracted trainers are very experienced industry practitioners and are able to relate to the trainees at an industry level. The trainers have teaching qualifications and are registered assessors with the relevant ITOs. They keep current with industry practice as they still work in the industry and engage in reading and online research to keep up to date with industry trends. The trainers showed that they are able to deal effectively with a variety of challenges such as different learning styles, learning disabilities, and unruly trainees.

Educational performance at ITW would be improved by embedding the training programmes as a continuous activity of the business rather than as the stand-alone courses that are currently being offered as required. This will enable trainers and staff to concentrate on training as a full-time feature and allow quality systems and infrastructure to become fully established and entrenched.

\*Source: <http://www.emsnz.com/>

## Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Industry Training Works Limited**.

ITW could improve on its self-assessment capability. The issues over 2010-2011 with TAM moderation of NZQA-administered unit standards have been resolved as a result of the expiry of the original unit standards. It is not clear that ITW fully engages in pre-assessment and post-assessment moderation, or is completely aware of the ramifications of not doing such moderation. The small size of the provider has compromised some moderation processes in that the manager occasionally moderates his own work. While the training situation seemed quite good, it is noted that there is no systematic observation of the trainers' professional practice and no systematic performance review.

It would be useful for ITW to start analysing the trainee data it collects in the electronic student recording system, with a view to identifying trends that influence business decisions and development of courses. In particular, ITW should analyse completion, attendance, and retention data and what happens to trainees after they complete the training. Seeking more systematic feedback from employers will assist ITW to understand the value and relevance of its training. There is also currently no tracking as to whether trainees eventually gain qualifications that are meaningful to the industry. It would be of use to the trainers if they received in advance some information regarding any learning deficiencies and disabilities that trainees may have. This would enable better preparation of training delivery to take these trainees' special requirements into account.

While ITW has performed satisfactorily in ITO moderation requirements, its moderation history with NZQA has been less satisfactory. Moderation of course material and assessments is very important as it provides an independent test of the validity, appropriateness, fairness, and consistency of the assessment before it has been used and after it has been marked. It is important in the future that ITW forms and utilises a robust internal moderation strategy and applies this in a consistent manner.

# Findings<sup>1</sup>

## 1.1 How well do learners achieve?

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

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

ITW provides short courses made up of unit standards to suit the particular needs of employers. Employers pay for the training and employees attend as part of their work obligations. In this respect, most of the courses have different combinations of unit standards and are designed mainly to help employers meet the compliance requirements of health and safety bodies. The courses usually run for one or two days at a location that is handy to the trainees' place of employment. Although ITW does not keep figures of trainee completion rates, it is estimated that around 95 per cent of trainees complete the courses successfully. Trainee achievement is recorded in a data-recording system that tracks attendance, achievement, and employment details. The system can track individual trainee progress and can access cohorts of trainees.

Through attending these courses, the trainees can gain valuable skills directly applicable to their workplace situations, although there is no monitoring of how useful the trainees or employers find these skills. The training helps the trainees and employers to meet compliance requirements for health and safety in the workplace, and for trainees this achievement is transferrable to other employers in the future. Trainee achievement is also shown by unit standard achievements being added to the record of achievement at NZQA, and these could lead to the attainment of national qualifications in the future. Because of the nature of these short courses, ITW does not track whether trainees go on to complete qualifications in the future.

It is not evident that the trainee database material is being analysed systematically and being used to inform course development or future strategy. ITW does not know exactly the completion rate of successful trainees, and the 95 per cent figure above is an estimate. Although the short nature of the courses would make this difficult, ITW does not have an awareness of how the courses could enhance the trainees' general life skills.

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

## 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 **Adequate**.

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

The flexible nature of the courses means that the provider can structure courses to exactly meet the requirements of the employer or client. However, it can also mean that the courses are constructed in a random way and there are few checks on cohesiveness. ITW has no approved or accredited programmes currently listed with NZQA, although it has submitted a short course for approval in recent times in response to new legislation, so it is not known how well structured the courses are. The courses are designed according to employers' needs, and by using combinations of the relevant unit standards the courses are tailored exactly to requirements. The employer is able to use such training to meet compliance requirements for occupational health and safety, first aid, and mandated industry standards. The intention is that trainees will gain skills in these areas which will make them more effective on the worksite, but ITW does not gather follow-up information on whether this happens, or how much employers value the skills after the training. Some of the trainees have worked in the industry for some time, and attending the course and gaining the unit standard record of achievement is a good way of affirming the knowledge and skills they may already have acquired informally. One value for the trainees is that their training record may make them more employable, and if they continue with a structured training programme they could achieve a national qualification. ITW does not currently gather information as to whether trainees go further with their training.

The evaluators gained an impression that there is a somewhat resigned attitude from management and students to the training. This impression was gathered during the interviews, where it seemed that management believed that both employers and trainees see the training as an employment condition to meet compliance requirements (in the case of the employers) and to keep the employer happy (in the case of the trainees).

The trainers that were interviewed remarked on the trainees' general resistance to being at the course at the start of each session, and how they had to work to break down this attitude. The trainers show initiative in countering this attitude, and as the courses progress the trainees are more receptive and generally warm to the task in hand. Each trainer has an individual strategy for this process.



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

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

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

ITW collects trainee feedback at the end of each course. This takes the form of a graded questionnaire with some room for comments. The feedback covers the teaching and the course, is mainly positive, and includes a few helpful comments. The trainees are not tracked further after the course is complete, and what happens to the trainees who do not achieve is not known. ITW currently takes its courses to the client and utilises provider facilities as the course venue. Anecdotal feedback indicates that this works well for employers. ITW management said that ITW 'hasn't yet mastered' getting accurate feedback from employers. ITW receives some feedback from the trainees as to the suitability of the learning environment that has been provided, which is used to inform future choices of venue. There is no formal process of enrolment because the trainees are sent by their employer to attend the courses as part of their employment requirements. This means that there is no formal way of identifying learning disabilities or literacy and numeracy issues. The trainers said they have been able to deal with these problems on an individual basis by engaging in one-to-one teaching and assisting the trainees who have writing difficulties when such issues are identified in the class. This seems to be effective at present given the high completion rate, but a systematic process of identifying trainee needs in advance of the course will be necessary if trainee numbers increase.

Generally, ITW meets the requirements of the standard-setting bodies. However, there have been difficulties with external moderation by NZQA in the past, with ITW having an adverse report from NZQA in 2010 and 2011. An action plan has been put into place with NZQA regarding these matters, and they appear to have been resolved. The issues with the first aid standards seem to have lapsed with the expiry and replacement of the unit standards. ITW management reports that the systems of implementing and reporting of units have been tightened up as a consequence. External moderation by the relevant ITOs (Forest Industries Training and Education Council (FITEC), New Zealand Industry Training Organisation (NZITO), and EMQUAL (Emergency Management Qualifications)) shows that generally there are few concerns about this provider's performance, and what small issues emerge are dealt with quickly by ITW.

## 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 **Adequate**.

The quality of teaching at ITW is generally good. This is in part because of the calibre of the trainers, who are very experienced in their respective industries. The two trainers who were interviewed both have teaching credentials and have achieved the unit standards in their discipline to the same level they are teaching to. The trainers have achieved unit standard 4098 *Use standards to assess candidate performance* and are registered as assessors with the ITOs. They are part-time contractors with ITW and work in the industry for the rest of the time. This assists the trainers to remain current with industry practices and the job-related issues associated with them. The evaluators heard that the trainers also keep up to date by reading professional publications, viewing relevant internet information, and attending refresher courses.

The trainers are responsive to individual learning needs, ascertaining which trainees need assistance when the training starts. Usually, there is no information from the employer regarding the individual learning needs of the trainees. The trainers are able to give one-to-one attention to those trainees who require it and gave the example of allowing trainees who have difficulty writing to dictate their answers which are then recorded. The trainers said they encouraged questions and attempted to make the training fun.

There is no systematic, formal observation of teaching skills as part of the trainers' professional appraisal. However, there are occasions when the trainers are able to observe each other in the training situation. Written feedback is obtained from trainees and trainers at the end of the course. Trainee feedback is in the form of a graded exercise with room for comments. It is not clear that this information is collated, analysed, and used to inform improvements and developments in the courses or teaching.

Training and assessment materials are sought, where possible, from the ITOs. This enables the provider to concentrate on the training itself, without having to design the materials and have them externally moderated. The handbooks that were seen are of good quality for training of this type. The evaluators noted that occasionally the trainee feedback showed that the learning environment was not entirely conducive to learning. 'Too cold' was one such comment (the trainers are restricted to the venue the employer provides). ITW management is aware of this situation and has moved to ensure it will not recur. While the trainers work at various sites, they are able to remain in contact with ITW management using email, and through the occasional meeting.

As mentioned earlier, the evaluators saw some evidence of inadequate internal moderation. Moderation is sometimes being done by the same person who has designed the material. This challenges the principles of objectivity and

independence that are inherent in good moderation practice. It was also revealed that, occasionally, unit standard assessments are adapted to make them more user-friendly. These changes are made without the knowledge of, or moderation by, the relevant ITO, and it is unknown whether the assessment remains fit for purpose. External moderation systems involving ITOs operate according to the expectation that PTEs will satisfy ITO requirements.

### 1.5 How well are the learners guided and supported?

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

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

The importance of trainee guidance and support is not critical in short courses of the type provided by ITW. This is because of the brevity of the courses and because the trainees are still being paid by their employers and are on employers' premises when the training takes place. There is no evidence that literacy and numeracy issues are being identified and included in the training, but it may be impractical to measure this in short one or two-day courses, given that the composition of the courses is generally different every time. It is evident that there is no specific tracking of Māori and Pasifika trainee progress or learning needs.

The trainers are able to facilitate individual learning requirements during the training. This is done informally on an individual basis, as the need arises. The trainers also try to maintain an appropriate learning environment and told of an incident where a disruptive trainee was required to leave the training for the sake of the others. One trainer adopts a buddy system where trainees are paired together to assist the slower learner.

### 1.6 How effective are governance and management at 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 **Adequate**.

ITW is part of Emergency Management Solutions and does not receive funding from government agencies. The two entities have a mutually supportive relationship, with their services complementing each other. In most cases, employers will fund their employees to receive training in selected unit standards to meet health, safety, first aid, and mandated industry compliance standards. This arrangement serves the needs of the employers well, and helps to finance ITW. Other financial assistance comes from Emergency Management Solutions, which also provides governance and strategic direction for ITW. Emergency Management Solutions has a strong connection with the timber processing industry through its

relationship with the largest wood product company in New Zealand, and is able to use this to pass training business to ITW. The two entities, ITW and Emergency Management Solutions, now have common directors, which cements the relationship even further. There is a 'flat' management structure at ITW, with only the manager (who doubles as a trainer), a part-time administrator, and contracted trainers as required. This makes ITW very responsive and flexible to its clients' needs, more so than larger organisations. ITW does not actively market for business but responds to contacts through Emergency Management Solutions, and so the courses do not run regularly but to order. ITW meets clients' needs by holding the courses at locations that suit the clients and do not to disrupt work requirements too much. As such, ITW's Hall Rd premises in Ngongotaha are not used much for training.

ITW has shown foresight in seeking accreditation for quite a large cohort of unit standards across the skills required for a range of industries. This allows the provider to provide the small unit standard-based courses to a larger segment of the market, if required. Currently, the courses are not run regularly, operating instead on a 'needs-be' basis. ITW has complied with legislative requirements to have a short course approved, and an application is pending with NZQA. It is unclear what impact the course approval requirements will have on the flexible approach that ITW can offer currently.

Recently, there was a restructure of the relationship between ITW and Emergency Management Solutions, resulting in better links and the common governance. The board of governors meets monthly, and there is a weekly strategy meeting to discuss ITW and Emergency Management Solutions matters. The evaluators saw evidence of minutes for the board meetings. The quality management system is reviewed at different times throughout the year or when needed. It has been designed as a procedure manual, which ITW management uses to guide their work practices.

# Focus Areas

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

## 2.1 Focus area: Governance, management, and strategy

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

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

## 2.2 Focus area: Courses based on the delivery of unit standard-based material

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

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

## 2.3 Focus area: Issues with NZQA Tertiary Assessment and Moderation (TAM)

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

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

This focus area was added to the EER as it has been identified as a weakness in the NZQA TAM reports of 2010 and 2011. In one instance (2010), assessment material was not submitted to NZQA for moderation as required. ITW management said they did not understand the importance of this requirement at the time. In 2011, material from another provider was submitted for first aid unit standards and NZQA was not satisfied with this. It was also discovered that the provider was assessing to previous versions of the unit standards. A section was omitted from the assessment for another unit standard.

ITW management has now put in place a system that checks the assessments before they are undertaken by the trainees, and has implemented an improved storage and filing system for the assessments. The issue with the first aid unit standards material being from another provider dissolved when the old unit standards expired and were routinely replaced by new ones. The evaluators noted that in order to remedy the above shortcomings, there were some changes made to the assessment materials. The improvement plan lodged with NZQA outlines some adjustments to procedure that are planned. The evaluators noted that there are still some areas of assessment moderation that need to be strengthened, particularly allocation of pre- and post-assessment moderation to give an independent and objective check of consistency, as detailed in previous sections of this report.

# Recommendations

The NZQA evaluators recommend that Industry Training Works Limited should:

- Implement more rigorous internal moderation systems. This moderation should operate to complement external moderation checks and should cover pre-assessment and post-assessment processes and samples of every assessment used.
- Gather feedback from clients (employers of trainees) in a systematic and formal manner so that the data gathered can inform course changes and development in a meaningful way.
- Analyse trainee database material to gauge trends that will assist in planning, forecasting, and development.
- Implement a formal system of monitoring the quality of teaching practice.

# Appendix

## Regulatory basis for external evaluation and review

*Self-assessment and external evaluation and review are requirements of programme approval and accreditation (under sections 249 and 250 of the Education Act 1989) for all TEOs that are entitled to apply. The requirements are set through the Criteria for Approval and Accreditation of Programmes established by NZQA under section 253(1)(d) and (e) of the Act and published in the Gazette of 28 July 2011 at page 3207. These policies and criteria are deemed, by section 44 of the Education Amendment Act 2011, to be rules made under the new section 253.*

*In addition, for registered private training establishments, the criteria and policies for their registration require self-assessment and external evaluation and review at an organisational level in addition to the individual programmes they own or provide. These criteria and policies are also deemed, by section 44 of the Education Amendment Act 2011, to be rules made under section 253. Section 233B(1) of the Act requires registered PTEs to comply with these rules.*

*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 EER process approved by the NZQA Board.*

*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](http://www.nzqa.govt.nz)).*

*Information relevant to the external evaluation and review process, including the publication Policy and Guidelines for the Conduct of External Evaluation and Review, is available at: <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>*

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