

Report of External Evaluation and Review

The Learning Place Limited

Confident in educational performance

Confident in capability in self-assessment

Date of report: 2 September 2015

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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: The Learning Place Limited

Type: Private training establishment (PTE)

Location: 33 Princess Street, Dunedin

Delivery sites: Course delivery is carried out mainly at various

approved venues to suit corporate or secondary school clients across New Zealand. An increasing number of courses are now being offered from the

recently refurbished Dunedin site.

First registered: 2011

Courses currently delivered • Short courses (Barista, Communication,

Customer Service, Leadership,

Employment Skills, Food Safety, Health and Safety, Hospitality Skills, Life Skills, Media, Security, Restaurant and Café

Service, Retail, Hotel Service)

Licence Controller Qualification (LCQ)

National Certificate in Retail and

Distribution (Level 2)

National Certificate in First Line

Management (Level 3)

Code of Practice signatory N/A

Number of students: More than 2,300 part-time students in 2014.

Ethnicity for 2014 (self-identified responses; data

gathered by the PTE):

- 61 per cent New Zealand/European
- 19 per cent Māori
- 10 per cent Pasifika
- 4 per cent Asian

66 per cent of students are female.

Number of staff: 3.5 full-time equivalents and five part-time contract

trainers

Scope of active accreditation:

The Learning Place has consent to assess for multiple domains in Service Sector, Law and Security, and Health as well as extensive unit standard consent in related areas, including

Hospitality.

Distinctive characteristics: The Learning Place offers face-to-face delivery of

short courses at levels 1-3 to secondary school students under STAR and Gateway funding streams. The next largest area of delivery is LCQ and food hygiene training to staff from hospitality businesses and those seeking employment in that field. The PTE is also offering Retail Distribution and First Line Management training for staff from a

corporate client.

The Learning Place has developed a mutually beneficial relationship with Sporting Clubs Association of New Zealand, delivering LCQ to club staff and enabling access to a range of suitable course delivery locations across the country. This also facilitates an ongoing link with

the hospitality sector.

Recent significant changes: The PTE was registered under the current

ownership in 2013. Additional consent to assess approval has been obtained from NZQA as the PTE further establishes itself as a deliverer of short courses to secondary school students. The academic manager/schools liaison position has

now been made a full-time position.

Previous quality assurance

history:

The last external evaluation and review (EER) occurred in June 2013. NZQA was Confident in the educational performance and Not Yet

Confident in the capability in self-assessment of The Learning Place. Two recommendations were made in that report:

- Implement the planned self-assessment framework, identifying practical processes for monitoring performance indicators and identifying developments and improvements
- Identify and implement a suitable process for ongoing appraisal, support and professional development for teaching staff.

A training scheme, Basic Customer Service, was approved by NZQA (March 2014) in accordance with current legislative requirements.

National External Moderation results – one Core Skills standard (12349 *Demonstrate knowledge of time management*) was externally moderated in 2013. None of three learner assessment samples were verified as at the national standard. The assessment required modification.

In 2014, assessment samples for two Core Skills standards (9705 *Give and respond to feedback on performance* and 12349) met the standard for six out of six learner results and met national requirements. Assessment samples for Mathematics in the Workplace standard 64 reflected the national standard for only one of three samples. The materials were not approved.

NZQA records show that credits for two unit standards (and 11 learners) were reported but had not been selected in the PTE's 2014 assessment plan.

Industry training organisation (ITO) moderation results – in 2015, assessment samples for retail and distribution Core Skills standard 27229 Respond to customers' complaints in a retail or distribution environment during customer interactions met external moderation standards for three out of three learner results and met the ITO's requirements.

2. Scope of external evaluation and review

Three focus areas were selected for this EER:

1.	Governance, management and strategy	Mandatory in all EERs.
2.	Short courses (formally assessed unit standard delivery and assessment)	This covers the majority of delivery, including STAR, Gateway and LCQ-related courses. Most learners are enrolled into one or more of these courses.
3	National Certificate in First Line Management (Level 3)	This formally assessed programme was piloted for an existing corporate client in 2014, and extends the EER coverage to review longer-duration, higher-level training. The National Certificate in Retail and Distribution (Level 2) was reviewed in the 2013 EER.

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 Learning Place provided the lead evaluator with a self-assessment summary and other supporting documents prior to the on-site visit. Due to the location of the PTE, scoping was undertaken by phone and email contact only. NZQA database information also informed scoping.

Two evaluators conducted the on-site enquiry phase of the EER over 1.5 days on 5 and 6 May 2015. The evaluators met with or otherwise interviewed:

- The chief executive/owner, the academic manager (both of whom also teach), three contract trainers and the assessment developer/moderator.
- Two students (these interviews were supplemented by extensive survey and focus group information gathered by the PTE).
- External stakeholders contacted included a general manager from the PTE's main corporate client, the Dunedin City Council licensing inspector, an

employer sending staff for LCQ training, a quality assurance manager at ServiceIQ (ITO), the chief executive of Sporting Clubs Association of NZ, a school principal, a STAR/Gateway coordinator, and a student from a local secondary school.

These interviews were supplemented by survey and focus group information gathered by the PTE, as well as testimonials from other community stakeholders including Dunedin police and other secondary schools.

Other documentation considered as part of the evaluation included: the quality management system and strategic planning documents; meeting minutes; self-assessment process mapping; moderation reports; teaching materials and assessment activities; teaching development tools; prospectus and course outlines; web-based material.

Aggregated performance data provided on site was supplemented by and compared with random samples of course cohort results, at the request of the evaluators on site.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **The Learning Place Limited**.

The Learning Place is clearly meeting all of the important needs and requirements of current stakeholders and clients, including learners:

- The Learning Place is developing and introducing new programmes in response to new and emerging needs. The PTE is highly responsive and flexible in its provision. A variety of satisfied stakeholders report effective engagement with this growing PTE.
- Since the last EER, rates of course and qualification completion have been consistently strong: 93 per cent for short courses, and 100 per cent for the smaller total of national certificate enrolments. The PTE is still developing extensive analysis of learner achievement, but data is reliable, course delivery is monitored, and results are tracked carefully.
- There is some evidence of direct contribution to valued outcomes for graduates (including improved access to part-time employment, clearer vocational direction, promotions at work, credits towards national qualifications such as NCEA).
- Course content is up to date and well taught, relevant to students' and stakeholders' needs and interests, and readily applicable to the related vocational setting. Evidence of effective teaching is well captured (as are any deficiencies), and related monitoring and teacher development processes are a notable strength of the PTE. Resources and facilities sighted by the evaluators are of high quality.
- Some gaps in external moderation performance exist, but they are not
 extensive enough to discredit achievement. Internal moderation and
 attention to assessment has been significantly strengthened over the past
 12 months with additional resources and tools. These efforts have yet to
 show evidence of their full impact in external moderation.

Overall, this evaluation identified very good staff capability and clear evidence that the PTE has the skills required to set strategy, manage growth, and respond to challenges while managing quality and compliance aspects.

Statement of confidence on capability in self-assessment

NZQA is **Confident** in the capability in self-assessment of **The Learning Place Limited**.

The Learning Place has a solid framework for quality assurance and review, and the associated planning and monitoring tools and review processes seem to be well embedded in practice across the organisation. Self-assessment is ongoing and authentic. However, evidence of significant impacts and traceable improvements from this activity is still emerging. For example, the information collated around achievement lends itself to deeper and more critical analysis, and some means of benchmarking performance would be useful.

Authentic, embedded and purposeful capture of feedback, using a variety of mechanism and methods, is notable at The Learning Place. Self-assessment information, including achievement data, is reliable, and the PTE is making efforts to continuously enhance or improve these processes. Management's understanding of self-assessment toward decision-making is good. External input sought from Ako Aotearoa workshops, for example, has been helpful in developing capability, and a culture of review is being fostered.

Ongoing review of all programmes and activities is occurring, with less convincing evidence that periodic review of each short course occurs across the growing portfolio of offerings. Systematic monitoring and review of staff capability and performance, met need, and course delivery seems effective, with examples of enhancements, refinements and improvements evident.

The PTE is clearly on the right track regarding self-assessment, and its evolution in capability and scope of delivery is quite marked since the last EER. NZQA can be confident in the PTE's current capability.

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 Good.

Rates of course and qualification completion at The Learning Place are consistently strong (see below). Data-gathering around completion rates by the PTE is systematic and reliable, but the information collated lends itself to deeper and more critical analysis. Although some gaps in external moderation performance have occurred, these are not extensive enough to discredit achievement. Attention to assessment reliability and validity has been significantly strengthened over the last 12 months with additional human resources, increased moderation frequency and new assessment tasks. These efforts look promising but have yet to show evidence of their impacts under external moderation conditions. Overall learner achievement at The Learning Place is very good, as is self-assessment of achievement. Governance and management are highly effective in supporting learner achievement (Focus Area 1).

Course completion rates for the short courses (Focus Area 2) are 91 per cent for the North Island and 94 per cent for the South Island. These results relate to all short courses and all students assessed since the establishment of the PTE. Current data analysis tabulates results course by course and region by region, and the PTE is also now consistently gathering participation data (gender and ethnicity). Currently, the PTE is still building a record of performance data, and is not engaging in benchmarking of performance.

Vocational content such as that of the high-volume Barista Skills course, or the Communication, Leadership and Security courses, provides valuable workplace-related knowledge in line with the objectives of STAR and Gateway funding² and the Vocational Pathway-related aspects of the school curriculum. In addition, LCQ and Food Safety courses provide the capability and certification required by hospitality establishments.

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

² The objectives of STAR are to: provide or purchase courses which will better meet students' needs, which will motivate them to achieve, and which will facilitate their smooth transition to further education, training or employment, support students to explore career pathways and help them make informed decisions about their schooling and future work or study (source: Ministry of Education). The Gateway programme provides broader educational options and strengthens pathways for secondary school students to further education and training or employment (source: Tertiary Education Commission).

All nine of the client company employees studying towards the piloted 2014 delivery of the National Certificate in First Line Management (Level 3) successfully completed the qualification (Focus Area 3). This success rate mirrors that of the ongoing delivery for the same client company of the National Certificate in Retail and Distribution (Level 2), with all 23 employees completing their qualification in 2014. According to enrolment data, 3 per cent of these graduates identified as Māori or Pasifika learners. The programmes leading to these qualifications contain content drawn directly from work practices and procedures at the client company, and contribute to the professional development of staff. There was good evidence that programme planning and review is ongoing and leads to improvements to the curriculum to maintain relevance to the workplace.

With growth, the PTE is now teaching students drawn from over 150 secondary schools. This has led to an increasingly diverse student demographic: 21 per cent Māori, and another 21 per cent Pasifika enrolments in the North Island, as well as increasing numbers of 'Other' ethnic categories. Deeper analysis of this participation and the related completions data would strengthen the evidence base around achievement and any links to actual improvement as a result of actions taken. The PTE demonstrates both the capability and the willingness to do further work in this area, and as a result of this diversification had already identified topics for the professional development of trainers.

A random sample of course results requested by the evaluators indicated sound record-keeping, and confirmed both the reliability and understanding of the achievement data as reported by the PTE.

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

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

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

The Learning Place makes a determined effort to gather information around the benefits and value gained by primary stakeholders, and in particular learners. A recently implemented six-month-out, targeted graduate survey, and face-to-face consultation with groups of secondary school STAR/Gateway coordinators and students have yielded some useful information. Records show that some students report benefit from immediate part-time employment opportunities in hospitality, and some are reportedly better prepared for university entrance or employment interviews. A key theme identified has been 'increased personal confidence' in relation to students' vocational preparedness as a result of completing their course.

Schools and their students benefit directly by gaining credits towards NCEA and Vocational Pathway certification. Measurement of the actual extent of this contribution may be quite valuable to the PTE and its stakeholders.

For corporate clients, completion by their staff of national certificates or the LCQ and Food Hygiene short courses contributes to staff professional development and/or meets compliance requirements of local councils. Both the Dunedin City Council licensing committee and the police provided favourable comment on the PTE's contribution towards their particular harm-reduction strategies. Outcomes from the First Line Management course have included promotion to a supervisory position in at least one case and new responsibilities in staff recruitment in two cases. Staff from this main corporate client, who come from sites across New Zealand, benefit in terms of financial and career progress outcomes. The retail and distribution course is mandatory within the first 12 months of employment for sales and service staff, and completion is 'expected' and links to a 'performance incentive-based progression' through pay grades.

A PTE staff member commented that as The Learning Place is primarily delivering short courses it 'can't be unrealistic about our impact, but we [gather feedback and] celebrate our successes'. Nevertheless, as is the case with self-assessment of achievement, analysis of more intentionally aggregated outcomes information — and closer identification of the valued outcomes intended from the training — would enhance the case for higher ratings under this key evaluation question.

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.

The PTE provided strong evidence of flexibility to meet learner and stakeholder needs in respect to timing, site, timetable and subject matter. Further investigation by the evaluators found that The Learning Place is a proactive and effective communicator with its stakeholders, both informing them of the PTE's activities and also seeking to understand their needs. They respond to feedback and changes in need. For example, the PTE is strengthening their capability in response to demographic changes in the learner profile (North Island/Māori and Pasifika learners).

As the PTE's provision in the STAR/Gateway area has grown markedly, new courses have been added to the portfolio of offerings. The PTE has on record various communications from schools that this provision has been collaborative and meets their needs, and the use of a mobile barista trainer (and related equipment) has enabled delivery at new locations, particularly in rural areas. This has included delivery for kura kaupapa tauira who may not easily have access to these opportunities.

Engagement with the ITO and collaboration with another PTE has enabled delivery in new areas since the last EER. Existing delivery with a corporate client has been recently extended into an additional, higher-level national qualification. Ongoing

feedback and review of this corporate training has led to enhancements in the curriculum. Contract teaching staff are appropriately involved in these self-assessment activities so far as they relate to teaching practice. The systems for managing timely and accurate results reporting and version control of assessments appear very sound. These quality assurance processes are particularly important with a dispersed teaching workforce, and are currently meeting secondary school, NZQA and ITO requirements.

Changes in the regulatory environment that have an impact on education and training are understood and responded to appropriately by management, for example LCQ training legislation and material changes, and the need for approval of a training scheme by NZQA in 2014. (Key evaluation question 1.5 also notes other examples of matched need.)

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 Learning Place has developed a purposeful, clearly stated delivery philosophy and is endeavouring to deliver on its promise.³ The PTE has a range of appropriately qualified and industry-experienced trainers, and based on the solid student achievement and positive feedback gathered in post-training surveys, teaching is generally effective. The academic manager's insight gained from experience in secondary school teaching is adding value to trainer development at the PTE. However, ensuring consistent practice and valid assessment across multiple sites – as evidenced by, for example, external moderation – is still a work in progress.

Apart from the small proportion of national certificate delivery, most student contact occurs over a few days of contact time only. Evidence gathered by the PTE through student surveys, focus groups and teacher observations indicates that the courses quickly engage learners, support development of competence for assessment, and provide learners with useful knowledge of workplace requirements and conditions. The evaluators interviewed a small sample of learners, but noted numerous examples of effective teaching practice leading to good classroom dynamics and outcomes. Survey comments by numerous other students certainly confirmed these findings around good engagement with learners.

The evaluators observed that the strategic plan objectives around resourcing an academic manager role and maintaining ongoing development of trainers are being implemented. A well-designed and well-led teacher development strategy is

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³ 'Our training delivery is empowerment based. We use a model of encouragement, equality and active engagement. We believe this is the best way to encourage success'. (Source: The Learning Place prospectus, 2015, p.6.)

operating (including induction, observation of teaching, and self-review linking to targeted professional development). The six-monthly teaching staff meeting and associated professional development workshop are notable and necessary, as the PTE has now grown to deliver across most regions of New Zealand. Some trainers are pursuing degree-level qualifications, some hold these already, and all staff are required to gain competency in the usual assessment and moderation standards required by NZQA consent and moderation requirements. The PTE has a strong focus on ensuring teaching effectiveness.

The PTE's self-assessment of processes underpinning teaching has captured some instances of less than effective course management or delivery, possibly reflecting that the PTE has seen consistent growth and is extending delivery into fresh areas. Management responses to these occurrences appear to have been effective. Similarly, although there have been gaps in external moderation performance, the frequency of internal sampling and the level of scrutiny given to assessment has increased. Incidents of learner non-completion are discussed among staff, and follow-up with students occurs wherever possible. Processes for gathering additional assessment evidence or allowing a 're-sit assessment' are appropriate. Evidence sighted in internal moderation files shows that follow-up occurs and checks and balances are being fairly applied. Self-assessment of processes supporting quality of teaching is sound. Analysis of re-sit rates by area is a useful step towards the kind of deeper analysis of performance suggested in this report.

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 guestion is Good.

The Learning Place offers a very useful range of course options for students to select from, but has limited control over entry to its courses. In this context, guidance and support are embedded in the teaching, and are relatively anecdotal and situation-specific. That said, the current clear and accurate prospectus is soon to be supplemented by a student-oriented version, and these are made available to schools via The Learning Place website.

For a broader audience, the PTE will soon release an online version of the LCQ course. It has been subject to testing and has had scrutiny from the related ITO to ensure assessment rigour. This is a useful innovation which will supplement and extend the PTE's existing delivery on this topic, and potentially meets learner needs and preferences. Investment in bringing barista training directly to North Island schools is indicative of the PTE's strategy around structuring learning environments to benefit learners.

A notable improvement has been the development of key information guides specific to each course – a response to gaps identified by the PTE's review process. Efforts are also made to understand critical individual learning needs, such as

behavioural or literacy challenges, before the course commences by means of the enrolment form. Trainers offer general educational and vocational guidance as appropriate within the context of each course. This may be significant for some students, and helps meet the objectives of the STAR/Gateway or Vocational Pathway programmes. Evidence gathered in course conclusion and post-course surveys indicates that this guidance meets a need and is valued by numerous respondents.

Corporate staff undertaking a national certificate in either Retail and Distribution or First Line Management benefit from the incorporation of company-specific material within the training. A graduate described using course materials in the workplace to meet the challenge of new responsibilities. This delivery also supports the client company's induction process and workforce planning. The course files provided evidence that The Learning Place had invested genuine effort and time to support individuals and groups to succeed.

Although there were no particularly concerning gaps or weaknesses noted by the evaluators, neither the material sighted nor the evidence presented by the PTE lent itself to a rating of exemplary performance under this key evaluation question.

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.

This evaluation determined that, based on a wide range of evidence available, The Learning Place is a well-led and reflective learning organisation which actively seeks to gather and respond to feedback in order to maintain and improve the educational achievements of its students. Direct stakeholder testimony, survey responses from school coordinators, and written testimonials provided from others indicate that the governance and management of the PTE is highly effective in meeting their needs while sustaining quality educational achievement. Growth is being well managed and innovation is occurring, as highlighted in this report. Investment in resources, including refurbished premises and classroom and new barista equipment, is apparent. In addition, the two recommendations made in the previous EER report and the PTE's post-EER improvement plan have been comprehensively responded to, leading to higher confidence in their self-assessment capability as summarised in this report.

Separation between the PTE owner's direction-setting and academic or operational decisions is being appropriately managed. An example is implementing monthly academic meetings with a review and performance focus as distinct from operational meetings. Review processes are embedded and ongoing, although as indicated under key evaluation questions 1 and 2, deeper analysis of aggregated data and valued outcomes is needed. Governance arrangements are relatively

informal, and as the PTE grows this may be an area to consolidate. At the time of the EER, for a PTE operating at this scale, this is not a gap. Active links with external groups such as the Institute of Directors and local non-profits are seen as useful by the owner.

A range of tools is used to effectively manage the PTE (including strategic plan, related SWOT⁴ analysis, an appropriate quality management system, performance appraisal and Cloud-based file sharing). Some aspects of document control and minuting could be improved, and the evaluators observed that the link between monitoring of strategy and operational management was on occasion somewhat blurred as a result. Fundamentally though, self-assessment processes relating to this key evaluation question are authentic, transparent and robust.

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⁴ Strengths, weaknesses, opportunities and threats

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: Short courses (courses based on formally assessed unit standard course content)

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: National Certificate in First Line Management (Level 3)

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

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

Recommendations

NZQA recommends that The Learning Place:

- Engage in deeper analysis of achievement data with the purpose of continuing to build the evidence based around the links between actions and improved outcomes or enhanced value for learners and other stakeholders.
- 2. Continue with efforts to ensure reliable and valid assessment occurs for all learners, as confirmed by external moderation.

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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