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# Report of External Evaluation and Review

## Franklin Institute of Agri-Technology

Confident in educational performance

Confident in capability in self-assessment

Date of report: 1 May 2018

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*Final Report*

# Purpose of this Report

*The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.*

## Introduction

### 1. TEO in context

Name of TEO:	Franklin Institute of Agri-Technology
Type:	Private training establishment (PTE)
First registered:	2015
Location:	760 Glenbrook Road, RD4, Pukekohe
Delivery sites:	As above
Courses currently delivered:	<ul style="list-style-type: none"><li>• National Certificate in Horticulture (Level 4) (General Horticulture and Nursery Production) (one-year programme)</li><li>• National Certificate in Horticulture (Level 4) (Advanced) (two-year programme)</li></ul>
Code of Practice signatory:	Yes
Number of students:	29 International students. Current enrolments are 26 from India; two from Fiji; one from Nepal.
Number of staff:	Four full-time staff
Scope of active accreditation:	<a href="http://www.nzqa.govt.nz/providers/nqfaccreditations.do?providerId=802895001">http://www.nzqa.govt.nz/providers/nqfaccreditations.do?providerId=802895001</a>
Distinctive characteristics:	Franklin Institute delivers horticultural training on a 24-acre commercial production site and is part of the Rupex Growtech Limited group of companies. (Franklin Institute is 20 per cent owned by Rupex.) This enables the students to combine theory and practice on the same site.

Recent significant changes: There has been a growth in numbers since the last EER, from one student in 2016 to 29 students in 2018. New groups of students have enrolled throughout the year as shown below, and expert staff have been employed for specialised areas of learning.

2016 – six enrolled and one left with a work visa = five enrolled

February 2017 – three new = eight enrolled

April 2017 – 12 new and one left with a work visa = 19 enrolled

July 2017 – five new = 24 enrolled

Four graduated with one continuing to the level 4 Advanced (4A) certificate = 20 enrolled

October 2017 – nine new = 29 enrolled

Franklin Institute had two new programmes approved in 2017: the New Zealand Diploma in Horticulture Production (Nursery Production) (Level 5) and the New Zealand Certificate in Horticulture Production - Indoor Production (Level 4). The PTE will begin delivering these programmes pending the results of this external evaluation and review (EER).

Previous quality assurance history:

The previous NZQA EER was held in February 2017 – NZQA was Confident in Franklin Institute of Agri-Technology's educational performance and Not Yet Confident in its capability in self-assessment. The EER report contained the following recommendations:

- 'Ensure students have appropriate health and travel insurance which covers them for the full period of their visa. (Refer to the Code of Practice guidelines.)
- Review its self-assessment systems to check how well they identify the effectiveness of the organisation's processes to monitor important compliance accountabilities, and how effectively they contribute to students succeeding and gaining outcomes of value.'

Following the concern noted about Code of Practice compliance systems in the 2016 EER, NZQA requested a copy of Franklin Institute's Code of Practice self-review report and to submit its attestation by 1 December 2017, which was done. A validation visit was conducted by NZQA, and Franklin Institute was required to update its Code of Practice policies and sign the attestation form. This was completed by February 2017.

Franklin Institute has met all industry training organisation (ITO) moderation requirements and has attended two Primary ITO regional cluster meetings. The ITO noted that all assessment examples viewed have been internally moderated and the work was of a good standard. Primary ITO visited the PTE in 2016 and again in 2017 and has reported favourably on the training practices sighted.

Franklin Institute has outsourced training for Growsafe and forklift licences.

## 2. Scope of external evaluation and review

Two focus areas were included in this evaluation.

### **International students: support and wellbeing**

NZQA introduced a standard focus area for all EERs of tertiary organisations that enrol international students. This focus area examines how effectively the organisation under review is discharging its pastoral care responsibilities towards its international students.

### **National Certificate in Horticulture (Level 4) (including the level 4 advanced certificate)**

The above two certificates were covered as a single focus area as they are taught consecutively if students decide to progress from one to the other.

### 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](http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction) 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.*

Prior to the evaluation, the lead evaluator visited the organisation and met with the owner/director, a contracted educational consultant, a tutor and the office administrator to discuss the scope of the EER, and to explain the evaluation process.

Before the EER the organisation submitted their:

- Self-assessment summary
- Code of Practice review
- Programme evaluation review
- Organisational goals and performance indicators.

The evaluation team of two visited the delivery site for one and a half days and interviewed the owner/director, three teaching staff, the office administrator, educational consultant, four members of the advisory group, and two classes of enrolled students. Further evaluation of documents submitted by Franklin Institute was carried out after the site visit.

#### *Disclaimer*

*The findings in this report have been reached by means of a standard evaluative process: <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.*

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

- *Identify organisational fraud<sup>1</sup>*
- *Provide comprehensive coverage of all programmes within a TEO, or of all relevant evidence sources*
- *Predict the outcome of other reviews of the same TEO which, by posing different questions or examining different information, could reasonably arrive at different conclusions.*

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<sup>1</sup> NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

# Summary of Results

## Statement of confidence on educational performance

NZQA is **Confident** in the educational performance and in the capability in self-assessment of **Franklin Institute of Agri-Technology**.

Students at Franklin Institute achieve well and gain transferable and sought-after skills and employment. Pass rates of 98 per cent are supported by positive moderation results from Primary ITO. The ITO's visits and cluster moderation meetings are showing that student achievement is consistently above and beyond national medians. Management has supported and accomplished a high standard of student engagement, progress and achievement, with 100 per cent industry-based employment for graduates. There is significant demand, including locally, for reliable workers in nurseries and market gardens.

There is good evidence that the programme development, design and delivery, including assessment, match the needs of the students and stakeholders. Franklin Institute works to change its programmes to match industry and student needs. The programmes have been developed to align with industry-designed standards. Franklin Institute designed the initial programmes to meet the needs of the National certificate programmes (levels 3, 4 and 4A) and then (as they became available) reviewed and re-developed the programmes to align with the New Zealand certificate (level 4) and New Zealand diploma (level 5) programmes.

There is good evidence of valued outcomes at Franklin Institute where useful and meaningful skills and knowledge are gained. The overall experience is highly valued by students, growers and the local community including employers. Feedback from both students and employers shows that part-time employed students are able to contribute to the industry through new insights and ideas while continuing with their study. Evidence gathered by Franklin Institute shows all graduates have gained improved positions/promotions because of their studies.

Teachers are well qualified, have relevant international experience, and are well supported with professional development programmes where the teaching staff are encouraged and supported to gain teaching qualifications in addition to their substantial academic competence. Franklin Institute provides effective support for students while they are on the programme. Innovative teaching and good alignment with the company's on-site resources support the learning.

The organisation continues to have strong connections with the local horticultural and business communities. The advisory group, with appropriate business and horticulture representation, continues to provide Franklin Institute with good information around community requirements and future employment demand in horticulture. These connections contribute to the PTE's ongoing performance in supporting and enabling graduates to gain employment. That said, the organisation is

still new and needs to continue building capability by embedding administrative and academic quality and growing its evidence base. Nevertheless, capability has improved since the previous EER.

Franklin Institute has excellent processes to monitor important compliance accountabilities. Relevant staff have a good understanding of their roles and responsibilities and are well supported by management.

The organisation has appropriate planning and a range of monitoring documents and processes, although these focus on information storage rather than increasing its effectiveness through self-review.

Franklin Institute needs to continue to build an evidence base. Data analysis could be strengthened to include, for example, more systematic analysis of, and actions resulting from, destination data.

# Findings<sup>2</sup>

## 1.1 How well do students 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**.

Students at Franklin Institute achieve excellent results, with a 98 per cent course and qualification pass rate in 2017, and 100 per cent of those who pass progressing to employment in the industry. This is illustrated in Table 1. The validity of the achievement is confirmed by the excellent ITO moderation results. Highly qualified staff check that the marked work is students' own work. Students who plagiarise or cheat are penalised.

**Table 1. Retention, completion and progression outcomes for National Certificate in Horticulture (Level 4)**

	2016	2017
Enrolment	1	20
Completions	100%	98%
Retention	100%	93%
Progression to higher study	N/A	20%
Progression to employment	100%	100%

Retention is high at 93 per cent. Franklin Institute is aware that the biggest barrier to retention and qualification success is the employment market – students who gain employment tend to abandon their studies, and this is the main reason for the few departures from the programme. To help improve retention, Franklin Institute has enhanced its industry links and helped with job placements – after-study job opportunities have encouraged students to stay and complete their studies.

Students are motivated to study. They are proficient in the English language and are well informed about working and studying in New Zealand. Many have previously studied at other providers where they have gained qualifications in business management and information technology but have not gained suitable employment. As a consequence, the students are highly committed to learning which results in worthwhile employment.

All graduates are employed in the horticulture industry and are seldom employed at a low level/beginner stage. Feedback from industry and the placement of graduates in

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<sup>2</sup> The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

supervisory roles provide evidence that students are gaining knowledge and skills in the field.

Employers with part-time students have noted the change in confidence and skills as students progress through their study. Students themselves have noted changes in their confidence: 'I was a labourer, now I have knowledge to impart and know what I am doing'.

The evaluators spent some time understanding the data provided. Better analysis of student enrolment, retention, achievement and outcomes data would assist Franklin Institute, particularly if student numbers increase.

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

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**.

Graduates, students and stakeholders value the outcomes achieved at Franklin Institute. The PTE provided good evidence from the industry, and from advisory and graduate feedback, that the two programmes offered deliver valued outcomes to the students and the agriculture and horticulture sectors, and make a positive contribution to the New Zealand economy. The qualification enables the student to obtain points for residency, i.e. a student working in this area is classified as a skilled migrant.

As noted under 1.5, Franklin Institute is supported by a diverse and active stakeholder advisory group. This group provides regular and effective information to management and teaching staff around what is required in the field, and offers information on community/iwi initiatives involving horticulture and agriculture. This ensures the outcomes of the programme reflect industry requirements and adds value to the students' learning.

Students value the skills and qualifications gained, which increase their employability, as shown by the 100 per cent of graduates employed. Students are encouraged to find work in plant centres or nurseries as they study, enabling them to put into practice their knowledge and skills. Employers' feedback acknowledged the confidence and work-readiness of the graduates.

A further indication of value has come from the high level of employment being offered to students and graduates. Almost all current students have secured part-time positions within the industry, with many job prospects and job opportunities available. Examples were given of stakeholders asking for work-ready graduates or being happy to take students on a part-time basis.

Table 2 shows graduate employment destination data for those who graduated in 2016, and students in part-time employment in the industry. These are good outcomes.

**Table 2. Graduate employment numbers and students in part-time employment (2016)**

Status	Level	Number	Horticulture employment
Graduate	NCH4	5+1	Full-time 5, part-time 1 (still studying)
Enrolled	NCH 4	19	Part-time 18
	NCH4 Advanced	10	Part-time 7

In the last 12 months, Franklin Institute has improved its industry links and has increased the number of industry site visits for students. This has helped students to be in direct contact with industry people and take advice on their future job opportunities.

The outcomes from the programme are good, but limited and recent. Franklin Institute needs to continue to monitor and build its evidence base regarding outcomes as more students graduate and move into employment.

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

Franklin Institute ensures its programmes are delivered as approved and meet the needs of students and relevant stakeholders. There is good evidence that the programme design and delivery, including assessment, match the needs of students and stakeholders. Programme schedules are designed to meet the programme as approved by NZQA including appropriate learning hours.

Franklin Institute runs a commercial operation on site which caters to students' needs by:

- aligning theory with practice
- providing continuity for students in the practical application of their learning
- enabling students to see what they can do once they qualify.

Franklin Institute regularly discusses the implications of programme changes with its advisory group, and with Primary ITO, current and future students and education recruitment agents, and responds to the feedback given. Further work could be done to update the advisory group on the requirements of the Code of Practice.

The director and owner of Franklin Institute has strong affiliations and relationships with the agriculture and horticulture sectors. Nurseries and growers provide opportunities for students to put into practice what they learn through part-time employment. The level 4 programmes are congruent with industry roles and jobs as the students and graduates can immediately gain work using the skills and knowledge gained.

Teachers are well qualified and, being originally from overseas, combine knowledge of different agri-climatic situations with considerable experience in New Zealand. Franklin Institute invites guest specialists from the industry to widen student knowledge about location specific issues, possible solutions and technologies. Tutor research projects are encouraged, and robust professional development programmes have begun where the teaching staff are encouraged and supported to gain teaching qualifications in addition to their substantial academic competence. Assessments are pre-moderated internally and then post-moderated by the ITO. This provides Franklin Institute and the industry with confidence that the assessments are fair, valid and consistent.

Franklin Institute works to continuously improve learning methods and bring subject experts in for course delivery. For example to deliver a standard (*Bud and graft young plants*) the PTE employed a specialist with 30 years experience to ensure the students gained relevant and current knowledge.

Franklin Institute management has identified that many international students come to Franklin Institute with good academic backgrounds and are capable of studying and achieving at higher levels. In response, they have begun developing a graduate diploma programme which they hope to have approved for delivery by mid-2018. This will also respond to the shift in government education and immigration policies by increasing the level of qualification for international students.

Franklin Institute shows good awareness around the change of NZQA policy to require institutions to specify and track 'self-directed' learning. The PTE is already working towards a change of approach as required by the PTE's teachers and students and will evaluate the impact on students as necessary. Franklin Institute has developed a model of delivery in which formal teaching is spread over three days of each week and reflects the focus and intensity of workplace practice. This is done to maximise the opportunities for student success both in their formal learning and in their post-study careers, and to promote the work-readiness of the students.

In addition to ongoing informal feedback from day-to-day contact with stakeholders, growers and nurseries, graduates and students, Franklin Institute seeks formal feedback through the advisory group, employers and students. The data from this feedback is yet to be fully analysed to give good information to match programmes with student and stakeholder needs.

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

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**.

At present all students are international but not new to New Zealand. All are well established in New Zealand and require minimum guidance in areas such as managing their visa and insurance requirements, and driving and accommodation. All the student intakes are direct and not through agents. Sensible selection and enrolment processes are in place to ensure the effectiveness of student recruitment, and include an individual interview with the director prior to offer of a place of study, to identify their commitment to the programme. These interviews are an example of good practice and are recorded.

Franklin Institute's programmes are delivered in a blend of theory and practical tuition and experiential learning, and are aligned as much as possible to standard work practices within the industry. Franklin Institute offers flexible programme delivery (Tuesday to Sunday) to match students' work and study needs. They also benefit from the programme being delivered at Franklin Institute's premises on the commercial growing site of its parent company, Rupex Growtech Ltd.

Student and public safety is covered by the health and safety provisions of Rupex Growtech's NZGAP (food safety) accreditation. Tuition on health and safety is provided in the first week of the programme and is then a feature of all teaching.

Surveys are undertaken at the end of each semester covering the students' learning, resources and the teaching. Management responds to the feedback immediately as evidenced by more computers being purchased, air conditioning installed and the students having their own Wi-Fi system.

There are fair and accessible procedures in place for complaints, discipline and appeals. Administration staff ensure that every student that enrolls has a valid study visa before they start the course. Attendance is taken daily and there is a good balance of male and female learners. Students say they enjoy coming to study at a workplace that supports their learning,

The review of the Code of Practice for international students was completed during 2017 and any actions noted have been undertaken. Franklin Institute has had no negative actions or outcomes from New Zealand Immigration Service random inspections.

Teaching staff are competent and sufficiently experienced and qualified. They have specific expectations regarding the theory and practical learning and require learning logs to be kept that include reflections. These are checked regularly. Teaching staff

have been and are involved in applied research relating to the subjects being taught. While not a necessity at this level, this research adds credibility to the programme.

One of the outcomes of the annual programme review was the introduction and use of Moodle online software to provide additional support for in-class learning. It is also used for the independent, off-site, self-directed study where it can be checked to see that the hours are being used effectively.

Students know about the support available, feel well informed about the programme before they enrol, and have a high level of satisfaction with their time at Franklin Institute.

## 1.5 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 Franklin Institute management team demonstrates good support for educational achievement. The PTE displays a clear mission, direction and value underpinned by strong leadership with effective academic guidance. Franklin Institute achieved the goals and objectives set for 2016-17 and has established new targets for 2017-18.

Franklin Institute has achieved a very high standard of student engagement, progress and achievement, with 100 per cent industry-based employment for graduates. The on-site commercial operation contributes to and supports the learning, as noted in 1.3.

The programme is well resourced. Good teaching and learning resources are provided. Effective administrative support enables teaching staff to maintain their focus on programme delivery. Franklin Institute has seen a reduction in students travelling to study from out of town as part-time work has been found for them close by and they are able to study in one location. Franklin Institute is alert to the needs of teachers and students and makes improvements to the learning environment promptly when these are identified and evaluated as being appropriate, examples being air conditioning and computers. The PTE has plans in place to expand buildings and resources as the student body grows.

The management and tutors work well alongside their industry and are open to suggestions. Attendance at ITO cluster meetings keeps them in touch with new thinking around education. Industry and community groups have been asking Franklin Institute to teach domestic students, and the PTE is keen to bring local students on board. In preparation the PTE has initiated the following:

- Participation in local career evenings
- Getting in touch with local community groups

- Working with a retired local principal (Papatoetoe High School)
- Co-opting a recent Young Horticulturist of the Year to the advisory group.

Franklin Institute maintains the support of a diverse, active and informative advisory group which has some long-standing large growers who are very involved in the programme development and support graduate outcomes, many employing students and graduates. Other members contribute to feedback on the wellbeing of the students and offer information on the community/iwi initiatives around horticulture and agriculture. Franklin Institute has added two members recently, both with excellent industry knowledge and engagement. It would be useful for the advisory group to learn more about the Code of Practice.

The management team monitors student progress on a regular basis and discusses these formally at regular management team meetings. They have recently started monitoring achievement and outcomes via a monthly dashboard which is in its infancy and needs some updating and refining. This data and the analysis of it could be better used to inform management on decision-making for future resourcing and part-time employment needs.

## 1.6 How effectively are important compliance accountabilities managed?

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**.

Working alongside the Rupex organisation, Franklin Institute is operating in a safe and legally compliant manner. This includes the equipment used in study or training.

The management of compliance is effective, with strong processes to monitor important compliance accountabilities and relevant staff having a clear understanding of their roles and responsibilities. A compliance tracking table has recently been introduced, but is yet to be tested for reliability.

Entry assessment records meet study prerequisites, and daily attendance requirements are systematically recorded. Insurance and visas cover the correct periods of study. Staff qualifications reflect the relevant level of qualifications and experience, and assessment is effective, with moderation requirements being met.

The 2016 EER report recommended that Franklin Institute: 'Ensure students have appropriate health and travel insurance which covers them for the full period of their visa. (Refer to the Code of Practice guidelines.)'

In response, Franklin Institute now has sound processes to ensure it complies with the Code of Practice. The evaluation team saw evidence that a robust internal review

against the Code of Practice was undertaken, with outcomes and actions being responded to.

Franklin Institute has fulfilled all compliance reporting requirements on time and has received no requests for clarification or overdue returns. NZQA attestations and returns have been met within required timeframes, and the programmes offered are being delivered consistent with NZQA approvals. Primary ITO visited Franklin Institute in 2016 and again in 2017 and has reported favourably on the training practices.

## Focus Areas

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

### 2.1 Focus area: International Students: Support and Wellbeing

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

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

### 2.2 Focus area: National Certificate in Horticulture (Level 4) (including the level 4 advanced certificate)

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 Franklin Institute of Agri-Technology:

- Strengthen data analysis to include more systematic analysis of, and actions resulting from, destination data.
- Continue to review its self-assessment systems for their effectiveness in informing management of student success and valued outcomes.
- Update the advisory group on the requirements of the Code of Practice.
- Continue to monitor timetable appropriateness in relation to changing visa conditions for international students
- Continue to develop facilities in response to increased demand and growth in student numbers.

# 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](http://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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