External Evaluation and Review Report

Brittain's 2005 Limited

Date of report: 14 August 2023

About Brittain's 2005 Limited

Brittain's provides vocational courses to schools and industry. The organisation also delivers Secondary Tertiary Alignment Resource (STAR) and Gateway training to local secondary schools, predominately focused on courses in cookery, barista, hospitality and retail.

Type of organisation:	Private training establishment (PTE)
Location:	55 Gill Street, Central Business District, New Plymouth
Eligible to enrol intl students:	No
Number of students:	213 students in 2022, including 50 Māori students and three Pasifika students. The PTE does not collect disability information for privacy reasons.
Number of staff:	One full-time, four part-time
TEO profile:	[Brittain's 2005 Limited](#) Brittain's offers STAR and Gateway provision across the majority of Taranaki high schools and kura.
Last EER outcome:	Brittain's previous EER outcome in 2021 was Confident in educational performance and Not Yet Confident in capability in self-assessment.
Scope of evaluation:	• Beverage and Barista (NZQA Training Scheme) [ID 122251] • STAR and Gateway courses
MoE number:	8092
NZQA reference:	C55245
Dates of EER visit:	16 and 17 May 2023 (virtual)

Summary of results

Brittain's offers a range of courses to schools and industry and is effective in delivering training to meet their needs. There have been some improvements since the last EER, including cohort-based analysis. However, the use of effective self-assessment is still developing and effective compliance management processes are not strong. There is also a lack of capability in the management of importance compliance accountabilities.

Confident in educational performance

- There is strong evidence of achievement in all courses, evidenced by high attendance rates, high completion rates, high retention rates and stakeholder feedback.

- The trainers have extensive knowledge and experience in their respective industries. They are highly regarded for their commitment and contribution to their industry and community.

Not Yet Confident in capability in self-assessment

- Graduates of STAR and Gateway courses often go back to school after the completion of each course, so destination data and analysis is limited.

- Brittain's is working on improving its use of relevant destination data, but analysis is limited to cohort-based analyses.

- The value to stakeholders and communities is strong. Brittain's has regular interactions with and support from stakeholders.

- Brittain's shows agility in being able to offer groups of unit standards to meet targeted needs. There is good evidence of contextualised and meaningful course delivery.

- However, organisational systems to gather and analyse data and information are still in their infancy. Self-assessment could be strengthened by feeding the findings of cohort analysis into the overall self-assessment of the organisation.

- The current organisational systems are not effective at tracking compliance accountabilities.

- Brittain's needs to develop greater awareness of its compliance accountabilities, including temporary site notifications, review of the new rules for existing training schemes transitioning to micro-credentials, and annual fee return requirements.

- Learning activities are engaging. The PTE has structured its learning environment so that it is culturally accessible to a diverse range of learners, including the high proportion of Māori learners that pathway to part-time and full-time employment.

- Management has a clear purpose and direction, and self-assessment has had some improvements since the last EER. However, many initiatives are new and require time for implementation to demonstrate the effectiveness of changes made.

Key evaluation question findings[1]

1.1 How well do students achieve?

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	Brittain's achievement rates are generally high. Secondary school students gain unit standards towards NCEA and grow relevant industry experience and confidence. Students already in part-time and full-time employment gain transferable and useful skills related to their roles.
	Attendance rates are high, typically over 90 per cent. This supports strong completion rates, which are 93 per cent overall, 95 per cent for STAR and Gateway courses, and 71 per cent for the training scheme/micro-credential.
	Māori and Pasifika tend to achieve on par with other ethnicities. This is enabled by strong engagement, inclusive learning environments, high attendance rates and empathetic pastoral care.
	The achievement of students with disabilities is unclear, as Brittain's does not actively collect this information due to privacy concerns. However, Brittain's noted that the recently updated memorandums of understanding with schools would allow for collection of this data, if required. The PTE should collect this data to understand trends for this priority group.
	Withdrawals and non-completions are well understood through cohort-based analyses. A sample of such practice reveals that the reasons for withdrawals or non-completions are often outside the control of the provider, and can include reasons such as the learner moving away from the region.
	Brittain's identified that data collection, where the schools hold the information, has been challenging. However, they have actively worked towards rectifying this by updating their memorandums of understanding to include requests for data such as ethnicity.

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

Final

	Self-assessment would be strengthened by bringing together the cohort-based analysis into an aggregated organisational self-assessment.
Conclusion:	Achievement, including completions, is generally strong. This is underpinned by high attendance and retention rates. Self-assessment has improved through collection and some analysis of more data. However, self-assessment could be strengthened by feeding findings of cohort analysis into the overall self-assessment of the organisation.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	The learning has strong value to stakeholders and communities, as evidenced by stakeholder feedback and destination data. Graduates gain useful skills which are beneficial for their respective industries and communities.
	Many secondary school students enrolled in STAR and Gateway courses often remain at school after completing courses with Brittain's. While this is a positive outcome, as students are staying engaged with school, it requires a different view on destination data for these students. Brittain's acknowledges this challenge and limitation and is working towards developing a tool to measure outcomes beyond completion rates.
	Cohort analyses show that the graduates who do not return to school often pathway into relevant employment or further study. However, this data is not brought together at an organisational level to better understand overall trends.
	Stakeholder comments to the evaluators during the enquiry phase – and feedback sighted from stakeholders to the provider – noted the graduates' growth in confidence and work-readiness, which helps them prepare for further study or employment. While this feedback is not formally captured, it is clear that effective, ongoing communication occurs with relevant stakeholders.

	Work placements are a valuable method of delivery to build work-ready graduates. This is valued by students, graduates and employers.
Conclusion:	There is strong evidence of value to stakeholders, predominately captured through ad hoc stakeholder feedback. The contextual nature of the destination data means it is not a useful measure of outcomes for graduates who return to secondary school. However, Brittain's is working on how to best collect and analyse this information.

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

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Brittain's designs its courses in consultation with stakeholders to meet their needs. Most courses are groupings of unit standards that are chosen to respond to stakeholder need. This supports current and future delivery.
	Learning activities and environments are designed in an engaging way that supports the needs of the student and prepares them for work. This includes relevant work placements.
	The training scheme has not undergone a thorough review (as recommended in the last EER report). Brittain's presented a retrospective file memo which provided internal recommendations for future offerings. However, this did not constitute an effective process for the ongoing review of the training scheme, as required by rule 4.1, criterion 6 of the Training Scheme Rules 2021 or awareness of the Micro-credential Approval and Accreditation Rules 2022. This gap reveals limitations in Brittain's capability in self-assessment, as the file memo did not include a review of outcomes, processes or compliance.
	When the evaluators enquired about whether Brittain's had carried out a review against the Training Scheme Rules 2021, they were directed to a recent consent to assess application. The application addressed Consent to Assess Against Standards on the Directory of Assessment and Skill Standards Rules 2022. However, it did not provide a completed review for

	maintaining accreditation as per the Training Scheme Rules 2021.
	Course outlines and student feedback did not verify that the required learning hours were delivered (as per the Training Scheme approval details).
	Moderation practice and procedure has improved since the last EER, and underpins the value to stakeholders.
Conclusion:	Courses are designed with the stakeholders at the heart of the delivery. There is strong anecdotal evidence that the training meets the needs of stakeholders. However, Brittain's has not carried out a formal and thorough review of their training scheme/micro-credential. There are also gaps in Brittain's understanding of the relevant rules and compliance requirements for an approved training scheme/micro-credential.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	Brittain's supports the students well in their learning. Student needs and goals are well understood and addressed on a one-on-one basis. At an organisational level, effective student support is evidenced by stakeholder feedback, high completion rates and high attendance rates.
	Learning environments are inclusive. Students commented to NZQA that they build relationships with other students, which supports their achievement.
	Brittain's supports the needs of students with disabilities through the wrap-around support system provided to all students (which does not necessarily involve Brittain's directly identifying a student with a potential disability). However, Brittain's gave NZQA good examples of supporting students with known or possible disabilities, as well as supporting students with specific literacy and numeracy needs.

	Brittain's Code[2] self-review reflects an organisation of its size, and shows how students' wellbeing and safety needs are met. Students' views are understood through anecdotal feedback and student evaluations. Students that NZQA spoke to felt supported, understood and heard.
	Brittain's could strengthen its use of data to understand student support needs and to inform organisation-level self-assessment.
Conclusion:	Positive learning environments and wrap-around student support provide students with the support they need to achieve their goals. Greater understanding of effective support mechanisms would be strengthened by the use of data at an organisational level.

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

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Brittain's purpose and direction is clear through the strong educational achievement of students, particularly of priority learners in priority areas. As a small organisation, Brittain's has an advisory board that helps support the direction of the organisation.
	Brittain's is agile and has responded to challenges like Covid-19 and the main delivery site needing earthquake strengthening. Where possible, practice and offerings have been adapted in response to these challenges. Staff told NZQA they have been supported to fulfil their roles, and this is shown through student achievement.
	Financial viability is also a challenge, particularly with events from before the last EER still having an ongoing impact. However, Brittain's is resolving this by exploring further funding opportunities and continuing to deliver offerings that meet stakeholder needs.
	Brittain's acknowledged that data collection is a challenge, but the PTE has made significant improvements since the last EER.

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[2] The Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021

	The data is mostly used on a cohort-by-cohort basis. Self-assessment would be strengthened by using the data at an organisational level.
	Brittain's management has a limited awareness of NZQA rules and requirements, as identified by the incorrect annual fee return submitted, the lack of a comprehensive review of the training scheme/micro-credential, and a limited understanding of some key PTE requirements.
	They have planned some improvements to their digital systems. Some of these changes will support data collection and enable better analysis. However, it is not clear whether the changes will address key PTE compliance requirements. To date, organisational self-assessment, and capability to corroborate understanding of PTE requirements is not sufficient. That said, Brittain's management has shown it can effectively support student achievement.
Conclusion:	Management, supported by the advisory board, is strong at supporting some educational achievement. However, understanding of PTE compliance requirements, self-assessment and use of data is still a work in progress.

1.6 How effectively are important compliance accountabilities managed?

Performance:	**Marginal**
Self-assessment:	**Marginal**
Findings and supporting evidence:	There are no major breaches or non-compliances. However, there are some gaps and weaknesses in Brittain's management of some important compliance accountabilities, including:
	• incorrectly completing the annual fee return and failing to comply with the Annual Fee Rules 2022
	• not proactively informing NZQA of temporary delivery sites
	• limited evidence of programme reviews to comply with rule 4.1 criterion 6 of the Training Scheme Rules 2021
	• under-delivery of learning hours in the approved training scheme

	• limited evidence that the training scheme/micro-credential is monitored to ensure it meets the programme approval document
	• limited evidence of a robust process for recognition of prior learning.
	Brittain's uses an academic calendar that covers basic compliance requirements; however, this does not provide sufficient evidence to show systematic management of important compliance accountabilities.
Conclusion:	There are weaknesses in how important compliance accountabilities are managed. There was a general lack of awareness of some responsibilities, which were not addressed until NZQA informed Brittain's.

Focus areas

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

2.1   Beverage and Barista Training Scheme

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	While outcomes for stakeholders of the beverage and barista training scheme (micro-credential) are positive, there is limited evidence of self-assessment and review of the training scheme (micro-credential) to inform change.
Conclusion:	Brittain's needs to undertake a thorough and formal review of its training scheme (micro-credential), including learning hours, to ensure the course is meeting stakeholder needs and compliance requirements.

2.2   STAR and Gateway courses

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

Recommendations

Recommendations are not compulsory but their implementation may improve the quality and effectiveness of the training and education provided by the tertiary education organisation (TEO). They may be referred to in subsequent external evaluation and reviews (EERs) to gauge the effectiveness of the TEO's quality improvements over time.

NZQA recommends that Brittain's 2005 Limited:

- Continue to improve how data can be collected and effectively used to support self-assessment.

- Collate the cohort-based data into an organisational self-assessment to better inform organisational changes.

- Complete a formal review of the approved training scheme.

- Regularly review all key compliance requirements, including each criterion of the NZQA rules and training scheme approval requirements to ensure the courses and the PTE as a whole remain compliant.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. This include NZQA Rules and relevant regulations promulgated by other agencies.

- Resubmit the 2022 annual fee return with a correct calculation of equivalent full-time students (ETFS) to comply with the Annual Fee Rules 2023.

- Ensure that the learning hours of the Beverage and Barista Training Scheme (Micro-credential) [ID 122251] are delivered in accordance with the approved programme.

Appendix

Conduct of external evaluation and review

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

Disclaimer

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

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

- *Identify organisational fraud[3]*

- *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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[3] 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.

Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2021, which are made by NZQA under section 452(1)(t) of the Education and Training Act 2020 and approved by the NZQA Board and the Minister of Education.

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

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

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

- *maintaining training scheme approval for all TEOs other than universities.*

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2021, the Consent to Assess Against Standards Rules 2021 and the Training Scheme Rules 2021 respectively.

In addition, the Private Training Establishment Registration Rules 2021 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes, training schemes and consents to assess and registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the Quality Assurance (including External Evaluation and Review (EER)) Rules 2021. The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

External evaluation and review reports are one contributing piece of information in determining future funding decisions where the organisation is a funded TEO subject to an investment plan agreed with the Tertiary Education Commission.

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz). All rules cited above are available at https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/, while information about the conduct and methodology for external evaluation and review can be found at https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/.

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