

# Report of External Evaluation and Review

New Zealand Fire Service, National Training

Confident in educational performance

Confident in capability in self-assessment

Date of report: 13 June 2012

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MoE Number: 9064

NZQA Reference: C06143

Date of EER visit: 27-29 March 2012

## Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Government Training Establishment's (GTE) 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 GTE itself for quality improvement purposes.

## Introduction

#### 1. GTE in context

Name of GTE: New Zealand Fire Service, National Training

(NZFS,NT)

Location: Central Fire Station, Oriental Parade, Wellington

Type: Government training establishment (GTE)

First registered: 1998

Number of students: Domestic: approximately 8,000 volunteers

Number of staff: 35 full-time equivalents

Scope of active NZFS,NT is accredited to deliver:

National Certificate in Adult Education and Training (Level 4)

 National Certificate in Business (First Line Management) (Level 4)

 National Certificate in Community and Workplace Fire and Emergency Management (Level 2)

 National Certificate in Fire and Rescue Services (Urban Fire and Rescue Operations) (Levels 2, 3 and 4)

 National Certificate in Fire and Rescue Services (Vegetation) (Level 2)

Sites: Training centres in Auckland, Rotorua (national

training centre), Wellington, Christchurch, and

Dunedin as well as on-station training

#### Distinctive characteristics:

- The New Zealand Fire Service has approximately 1,700 professional fire fighters and 8,000 volunteers
- Only the training of volunteers was evaluated as career staff training was subject to industrial action
- Some volunteers attend less than five incidents a year, but their training needs are the same as volunteers attending over a hundred incidents in a year
- There is open entry to volunteer training, so provision has to be made for a range of abilities
- NZFS, Professional Development Unit has been known as NZFS, National Training since the beginning of 2008
- The New Zealand Fire Service is in the final stages of implementing a new evaluation strategy after a review of evaluation started in 2008
- NZFS,NT has a pool of over 300 trainers, of whom approximately 50 are used frequently
- Approximately only one-third of the calls to the New Zealand Fire Service are related to fires
- Internal moderation is undertaken by a team of specialist moderators
- External moderation is undertaken by the industry training organisation, EMQUAL Emergency Management Qualifications (EMQUAL)
- Kirkpatrick's model of evaluation is used by NZFS,NT based on the sequential aspects of reaction, learning, behaviour, and results
- Volunteer recruits spend between three and six months working through the programme materials and attend a two-day first aid training course. They then attend a volunteer recruit course for a week. This is

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- a practical training course, after which skills are consolidated for at least three months
- The volunteer station officer programme takes between 18 and 21 months. It consists of five distance learning courses, two workbooks, a written assignment, and a block course incorporating practical assessment. Volunteer station officer students must have successfully completed the NZFS,NT senior firefighter programme
- The pump operator course is a course of up to five days undertaken by volunteer firefighters

Recent significant changes:

- A restructuring in which all training is now being coordinated by the national training division rather than by the regions will be fully operational from 1 July 2012
- All volunteer block courses in the North Island are now being run at the national training centre in Rotorua

Previous quality assurance history:

At the last NZQA quality assurance visit, an audit in 2007, the NZFS, Professional Development Unit met all relevant requirements of the standard in force at the time.

### 2. Scope of external evaluation and review

The external evaluation and review examined the following focus areas:

Volunteer Recruit Programme

This was selected as it is the first and largest programme in the Training and Progression System (TAPS).

Volunteer Station Officer Programme

This was selected as it is the last programme of TAPS.

Volunteer Pump Operator Course

This was selected as it is typical of the specialist short courses run by NZFS,NT.

Governance, management, and strategy was not a mandatory focus area as this area is already covered by other external monitoring.

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#### 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 GTE has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

The external evaluation and review was conducted over three days by two NZQA evaluators: two days at the head office in Wellington and one day at the national training centre in Rotorua. The evaluation involved interviews with:

- The director operations and training
- The national training manager
- The learner support advisor
- The programme managers of the focus areas
- Two trainers from the pump operator course
- Eight other trainers via phone
- Three New Zealand Fire Service internal moderators
- Fifteen current students from the volunteer recruit programme
- A range of students from the volunteer station officer programme and the volunteer pump operator course via phone
- A range of stakeholders via phone including EMQUAL.

The evaluation also involved a review of relevant documentation such as the student evaluation forms, meeting minutes, self-assessment reports, course reports, annual reviews, stakeholder feedback, moderation reports, and associated correspondence. Phone contacts had to be extensively used by the evaluation team as NZFS,NT is a national training organisation and volunteers are spread throughout the country.

## Summary of Results

### Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **New Zealand Fire Service**, **National Training**.

As a result of the factors mentioned above, this external evaluation and review only relates to the training of volunteers. This is significant as the volunteer trainees' primary motivation is to develop skills rather than a qualification that will help them in their careers. Although NZFS,NT recognises this, it has applied to be able to package the volunteer training into a level 2 national certificate. Nevertheless, NZFS,NT can point to high pass rates such as rates above 90 per cent for trainees who complete the volunteer station officer training and the volunteer recruits training. The evaluation team considered these rates to be high as all the trainees are undertaking the programmes in their own time and the programmes vary in length from six months to 18 months.

The trainees develop the requisite high levels of skill that are necessary in the types of environment in which volunteer brigades will be asked to operate. They will be expected to manage the community fire risk and be able to respond to a range of incidents. These outcomes are the reason why emphasis is placed on practical assessments in the block courses which are such an essential component of each of the focus areas. The assessments are based on scenarios that firefighters might face, and each of these scenarios is used effectively by the trainers to give feedback to the trainees, both immediately and during the debrief sessions.

The evaluation team spoke to a range of stakeholders who confirmed the achievement of the desired outcomes. The stakeholders mentioned the importance of having trained firefighters in the local community and the way in which they contribute a range of community benefits such as knowledge of first aid practice and help with accidents. These are valuable outcomes for the community.

NZFS,NT provides effective leadership to the delivery of volunteer training. The restructuring, in which all training is now being coordinated by the national training division rather than by the regions, has already borne fruit and the new extension to the national training centre in Rotorua is one embodiment of it. The best training practices from the past are being retained and integrated with improved material which also has e-learning capability. The use of practical scenarios has proved to be particularly effective in giving feedback both on an individual basis and to groups during the debrief sessions. Emphasis has been placed on developing the volunteers' firefighting skills so that the community is protected from fire and attendant risks. At the same time, the management of NZFS,NT has ensured the volunteers are supported via a network of mechanisms and strategies.

The evaluation team recognised the generally strong level of educational performance. High standards are essential in the firefighting environment but NZFS,NT could undertake more research into the reasons why some volunteers do not successfully complete the programmes.

### Statement of confidence on capability in self-assessment

NZQA is **Confident** in the capability in self-assessment of **New Zealand Fire Service**, **National Training**.

In the past, regional and national training operated as separate entities, self-assessment varied from region to region, and the evaluation of TAPS programmes was variable. The review of the volunteer recruit programme materials was completed in 2011 and improvements have been made which have been received well, according to the interviews held by the evaluation team. The process of reviewing all other volunteer TAPS training materials started in the middle of last year and is due to be completed in October 2012. A wide range of stakeholders has been involved including learners, managers, advisors, and subject specialists. The new materials are being designed to be as user-friendly as the new recruit programme materials that are already being used. These review projects are an effective form of self-assessment as they consider the learners' needs, integrated assessment practice, and adaptability to the e-learning environment.

Although there is still room for informal self-assessment, NZFS,NT has recognised the need for a more comprehensive approach. A new evaluation strategy is in the final stages of implementation after a review of it was started in 2008. The student evaluation forms have been redesigned and provide more quantitative and qualitative data than they did before. This data is collated and reports will be prepared using the data twice a year. The consolidation of all volunteer training under NZFS,NT allows the data to provide a much better overview of the effectiveness of the training. The previous review system provided data that was used as the basis for making decisions, and examples were seen by the evaluation team of improvements made following those decisions.

The new system retains the strengths of the old system but makes it more comprehensive. In 2012, structured workplace conversations between brigade training officers and independent staff members are being introduced. These take place three months after the training has been delivered and will show the extent to which skills and knowledge learned during training are transferred to use on the brigades by the volunteers. This new type of self-assessment is typical of the proactive approach being taken by NZFS,NT. At the moment, the effectiveness of the changes cannot be fully judged as there has not yet been enough time to show the impact of the improvements made following the analysis of the data being yielded.

## Findings<sup>1</sup>

#### 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.

Qualification completion rates are easier to calculate for career firefighters than for volunteers, and are not as meaningful for the latter as these trainees are not aiming to achieve a qualification that will help them in their careers. There can also be a long time-lag between volunteers enrolling on a programme and starting or even finishing it. However, above 90 per cent of the attendees pass their week-long volunteer recruit course and go on to successfully complete the entire volunteer recruit programme. This programme involves 13 unit standards worth 31 credits.

A similar pass rate exists for the volunteer station officer programme, even though NZFS,NT recognises that the long time taken to complete this programme and the emphasis on distance education means it is likely that some trainees will take longer than others. The evaluation team considered these rates to be high as all the trainees are undertaking the programmes in their own time and the programmes vary in length from six to 18 months. The pump operator course involves three unit standards worth 12 credits, and over 75 per cent of the trainees pass. These pass rates are recorded in the reports completed by the trainer at the end of each course.

The evaluation team spoke to trainees on all the focus area programmes. They described the confidence they felt about using the skills they developed during their training. They also recognised that some of these skills could be transferred to their chosen careers as well as to firefighting. The pass rates, the confidence in improved levels of skill, and positive feedback to the evaluation team from stakeholders such as chief fire officers and area managers, indicate good levels of achievement.

NZFS,NT has close contacts with chief fire officers and area managers and uses them to gain informal feedback on the training delivered. It is recognised that NZFS,NT would be informed anecdotally very quickly of any weaknesses in the training. However, NZFS,NT also acknowledges that the course review system should be more formalised and at the beginning of this year introduced a post-course evaluation to take place three months after the training has been delivered. Brigade training officers are now being asked to participate in structured workplace conversations with independent staff members. One of the four formal questions in these conversations asks the brigade training officer supervising each student who

<sup>&</sup>lt;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.

attended the training to identify the missing gaps in skills and knowledge. The results from these conversations are being collated and are designed to be used to improve the effectiveness of the training.

Even though most of such feedback occurred only informally before 2012, nevertheless it resulted in some improvements. A good example was the success in increasing the pass rate for the volunteer station officer programme from approximately 70 per cent to over 90 per cent during the past 18 months. This occurred after it was identified that some trainees needed one-to-one tuition as they were not undertaking the necessary preparation for the practical course. Trainees are now provided with more such tuition when it is required. Although the non-completion rate has dropped, a better understanding of the reasons why trainees do not complete some courses would be useful. Informal benchmarking through a community of practice takes place by comparing fire service training with that of the police and the armed service, but there is no specific comparison of the training of volunteers.

## 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 **Good**.

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

The outcomes of the training in the three focus areas are considered to be the effective management of the community fire risk and the ability to respond to a range of incidents. These outcomes are the reason why emphasis is placed on practical assessments in the training block course that is such an essential component of each of the focus areas. The outcomes of the pump operator course are particularly valued as the training can be delivered at the local brigade. This means that it can be adapted to the peculiarities of the local environment and the local equipment.

The evaluation team spoke to a range of stakeholders who confirmed that the outcomes were being achieved. The stakeholders mentioned the importance of having trained firefighters in the local community rather than having to rely on career brigades from larger settlements. The local firefighters also contribute a range of community benefits such as knowledge of first aid practice, help with accidents, and a rise in the trainees' self-confidence. These are valuable outcomes for the community and are recognised as such by the feedback provided to NZFS.NT.

The trainees also receive some valued outcomes. Many of them appreciate the unit standards they obtain, and graduates of the volunteer station officer programme can obtain a level 3 national certificate. The trainees recognise the personal skills they develop and that their employers as well as the local brigades will benefit from them.

The value of the outcomes is increased by the extensive involvement of the stakeholders in the programmes. The advisory group for the pump operator course, for example, reviews the training material, keeps up to date with the latest techniques, and is closely involved with the training of the trainers. Furthermore, a thorough consultation process took place for the brigade training guide.

Self-assessment used to be mainly informal, mainly consisting of feedback from the brigades on the training and incident reports highlighting any training deficiencies. The strong emphasis throughout NZFS,NT on developing relevant skills and their application ensured that this feedback took place, but as it was informal it was not as thorough as it could have been. Since the beginning of this year, the structured workplace conversations taking place three months after the training have included questions for the brigade training officers on the relevance of the training to the workplace and possible improvements to the training. These provide a more formal measure of the value of the outcomes.

## 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 **Good.** 

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

NZFS,NT recognises the nature of the environment in which the effectiveness of the training is tested and successfully emphasises the importance of programmes matching the needs of stakeholders. These programmes are updated regularly and the scenarios are kept as realistic as possible. In this way, the programmes are kept relevant and the needs of the community for protection from fire and for the provision of response to emergencies can be met.

NZFS,NT adjusts its programmes for the needs of different types of learners. Many of the trainees spoken to by the evaluation team described the wall posters in local fire brigades as encouraging trainees to inform their trainers if they have any learning problems. A needs analysis takes place on the first day of the volunteer recruit course and there are numerous opportunities on the other courses for trainees to self-identify learning issues. The evaluation team heard about reader/writers being supplied for some tests and others where oral tests were used instead of written tests. When two trainees on a course in Manawatu felt out of their depth, they were given the chance to leave and return to their local brigades where they organised some scenarios for training purposes. These had the effect of giving the trainees more confidence in their abilities and they succeeded in passing the assessments when they were given another opportunity. However, although people interviewed by the evaluation team were adamant that sufficient allowance was made for trainees with learning problems, more thought could be given to developing a system whereby trainers could be informed of trainees' possible learning problems in advance of the course.

NZFS,NT recognises that some of the pre-course learning material can prove a barrier for some learners and is investigating the development of blended learning strategies. Some stakeholders mentioned to the evaluation team that information technology could be used to a greater extent. NZFS,NT has responded to such calls by providing more DVDs and CDs but is also conscious that broadband access can be a problem in remote areas. This typifies the informal self-assessment taking place of the extent to which the stakeholders' needs are being matched by the programmes. The structured workplace conversations are formalising some of these processes. Some formal processes already take place in the form of thorough programme reviews. One of these identified a need for more emphasis to be placed on leadership and management and this change has been made in association with Tai Poutini Polytechnic.

#### 1.4 How effective is the teaching?

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.** 

Each of the courses and programmes involves the study of pre-course material via distance education which prepares the trainees for the assessments that take place on the practical courses. The pre-course workbooks are checked by the trainers. In some programmes, such as the volunteer recruit programme, a training log must be completed before attendance, and a consolidation log is used after the practical course to record tasks completed by the trainee. Many of these tasks are completed during the fortnightly training sessions run by the local brigades. Such sessions are an effective way of reinforcing earlier training.

However, the predominant view expressed to the evaluation team was that the most effective training takes place during the practical courses. The whole class of volunteer recruits met by the team spoke highly of the use of scenarios. They appreciated the way in which the trainers were hands-on with them and were continuously giving feedback both individually and at debrief sessions after each scenario. This is a very effective form of feedback to the trainees. If the trainers identify a need for ongoing training in a particular case, this feedback is given in written form. The evaluation team observed a sample of scenarios and saw how the new extension to the national training centre in Rotorua is used to provide a wide range of realistic scenarios. During the volunteer station officer course, a good teaching approach was evident in the use of a scenario as a formative assessment.

For both the volunteer recruit programme and the pump operator course, the practical assessments are broken down into a series of competencies so that a reassessment can take place on a particular competency. In the volunteer station officer programme, a different approach is taken as each trainee has to pass two out of the three practical assessments. The validity of the assessments is increased by the presence of specialist NZFS,NT moderators on many of these

courses. They report at six-monthly intervals on aspects such as the assessment practices observed, the assessor meetings held, and the moderation visits and post-assessment moderation. EMQUAL has also attended courses in its role as external moderator and has a very high opinion of NZFS,NT training. One of the EMQUAL moderators described NZFS,NT as a deliverer of 'high quality training' that does 'everything to a very high level'. The trainers were described as 'passionate and learner-focussed'. NZFS,NT has a high level of involvement with this industry training organisation and receives useful feedback from it regarding the relevance of its courses and its assessment practices.

The involvement of NZFS,NT's own specialist moderators and the widespread use of a person different to the trainer to undertake the assessment are good ways of checking the effectiveness of the teaching. Informal self-assessment has also been effective and this is demonstrated by the way in which the numbers on the volunteer station officer block course dropped from 15 to 12 after trainer feedback. Written feedback from a lead trainer to a programme manager also resulted in a clarification for the learners of a calculation in the hydraulics section of the pump operator course.

NZFS,NT's new evaluation strategy was approved in 2010 and is in the final stages of implementation. As befits a high-quality trainer, NZFS,NT is committed to completing the evaluation cycle by accumulating more evidence of changes in trainee behaviour and raising this aspect to the level of the other three aspects of reaction, learning, and results. New student evaluation forms for TAPS' programmes and specialist courses are being used in 2012 and these are supplying both quantitative and qualitative data. They are being supplemented by the structured workplace conversations to form a more comprehensive self-assessment system than existed before. The results of the trainees' evaluations form part of the senior trainer course reports, and the collated evaluation results are shown to the trainers. At the same time, a thorough review is taking place of all volunteer TAPS material, so NZFS,NT is confident that the complete teaching process is being evaluated. Peer review of the trainers is being considered and would be a valuable addition to the self-assessment system.

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

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**.

NZFS,NT recognises that support is a critical component of its programmes, including the distance education. A specialist division of NZFS,NT is available to trainees to provide assistance with such aspects as improving reading and writing skills and setting up a study support group. Trainees comments ranged from, 'if I can make one statement it would be to put your pride aside and make use of this valuable resource' to, 'I should have used them more often...I was reluctant to get advice and wasted time trying to battle through assignments'.

This is but one part of an extensive support umbrella that encompasses personal, professional, and organisational domains. NZFS,NT is involved in all of these domains through a trainee's peers, the brigade officers and crew members, and the trainers and training managers. The brigade training guide describes the support provided and the means by which it should be, including managing station learning opportunities, signing off workbooks, and identifying any blocks to a trainee's progress. This support is comprehensive and was recognised as such by the trainees spoken to by the evaluation team.

The support is rendered even more effective by the low trainer-to-trainee ratio of 1:4 on the practical courses. The trainers relate well to the trainees and respond to a trainee's questions and concerns. The better understanding gained of the specific support needed by a trainee leads to the types of flexible response outlined in section 1.3 involving, for example, oral rather than written tests. NZFS,NT effectively uses the low staff-to-student ratio to informally assess the effectiveness of the support being provided.

One of the six questions on the new TAPS programme student evaluation form explores the quality of assistance and guidance and another explores the quality of coaching and mentoring in the workplace. The emphasis on evaluating the support provided demonstrates the commitment of NZFS,NT to self-assessment in this area. When NZFS,NT recognises a need to change a practice it takes action. A recommendation in a trainer course report in February 2010, for example, led to a new student appeal process flow chart. The understanding is deepened by the informal feedback in the form of emails to NZFS,NT and the feedback via various avenues from the brigades to NZFS,NT.

## 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.** 

NZFS,NT is responsible for the functions of education services, delivery, and GTE systems and moderation. It has established a high-level national training advisory group, including representatives of the NZPFU (career firefighters' union), the UFBA (volunteer brigade association), and EMQUAL, to provide oversight and governance on the achievement of the NZFS,NT training strategy. There was clear evidence of plans, policies, and practices supporting the strategy. The communication throughout the organisation was good.

In the past, it was felt that there was a lack of connection between NZFS,NT and the regions. This has improved since the restructuring process began. Procedures are now more uniform and steps such as the review of the first draft of training procedures for volunteer staff are taking place. A team of people at NZFS,NT works continuously on developing training material. Care is being taken to ensure that the new volunteer material being developed can be adapted for e-learning, and further moves in this area are taking place. These changes demonstrate the way in which the leadership is effectively balancing innovation and continuity.

The training budget is generous and a high level of resourcing is apparent. The recently opened extension to the national training centre in Rotorua illustrates the commitment of the New Zealand Fire Service to training. A series of 'Train the Trainer' courses, in which the trainers are shown the latest techniques and equipment, has enabled good initial use of these new facilities. NZFS,NT has set the National Certificate in Adult Education (Level 4) as a minimum requirement for trainers and level 5 for training managers. It is also considering level 6 training from a quality training provider to offer a further defined educational pathway for trainers.

A broad-based approach to self-assessment was evident to the evaluation team. A volunteer TAPS review is already under way and producing results. The national training advisory group monitors the progress towards achieving the training strategy and the national training objectives outlined in the business plan. NZFS,NT attempts to review its own performance through 360-degrees feedback surveys.

### **Focus Areas**

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

#### 2.1 Focus area: Volunteer Recruit Programme

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

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

#### 2.2 Focus area: Volunteer Station Officer Programme

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: Pump Operator Course

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

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

## Recommendations

There are no recommendations arising from the external evaluation and review, other than those expressed or implied within the report.

## **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 GTEs 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 GTEs 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 GTE 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).

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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