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# External Evaluation and Review Report

Academy of Diving Trust

Date of report: 23 May 2019

# About Academy of Diving Trust

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*The Academy delivers scuba dive training through a national network of dive businesses. Programmes include introductory dive through to instructor training, producing internationally certified graduates to work in dive-related industries.*

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Type of organisation:	Private training establishment (PTE)
Location:	70 Clifton Terrace, Fitzherbert, Palmerston North
Code of Practice signatory:	Yes
Number of students:	Domestic: 311 (229 equivalent full-time students in 2018); Māori 72 (23 per cent), Pasifika 12 (4 per cent)  International: one
Number of staff:	45 full-time equivalents
TEO profile:	<a href="#">See NZQA - Academy of Diving Trust</a>  The programmes are at levels 3-6 on the New Zealand Qualifications Framework.
Last EER outcome:	NZQA was Highly Confident in the educational performance and Highly Confident in the capability in self-assessment of Academy of Diving Trust at the previous external evaluation and review (EER) in 2015.
Scope of evaluation:	<ul style="list-style-type: none"><li>• Diploma in Professional Scuba Instruction (Level 5); Certificate in Medic First Aid Career Instruction (Level 4)</li><li>• Marine Academy: National Certificate in Diving (Foundation) (Level 3)</li><li>• International Student Support and Wellbeing</li></ul>
MoE number:	9231
NZQA reference:	C33335
Dates of EER visit:	12-15 February 2019

# Summary of Results

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*The Academy has strongly met the key needs of most students, its industry and other important stakeholders. It has identified and reviewed most of its priority needs. There are some gaps, none serious, that require attention.*

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## **Confident in educational performance**

- The achievement of most students is at least strong; however, the quality of self-assessment is mixed. Non-Māori are achieving at higher rates than Māori, and this gap has not been effectively addressed.
- The outcomes for graduates, industry and school partners are of high value. The quality of the dive training is high, leading to very strong destinational results. The Marine Academy programme enables secondary students to personally and technically develop and complete their school education.

## **Confident in capability in self-assessment**

- Robust, internationally certified programmes are delivered within operating dive shops, offering students opportunities to apply their learning in a dynamic, real-world environment. Trainers are nationally and internationally certified dive and first aid instructors. Most students are well supported to complete their studies.
- The leadership has been effective in enabling the PTE to respond to and meet the important and changing needs of most students, industry and other key stakeholders.
- Many, but not all key compliance accountabilities have been effectively managed. Two were significant, the other gaps had a moderate impact. Change is required.
- Self-assessment is sound and covers nearly all key areas. The quality is generally good and used to maintain or improve typically strong performance. Some gaps require attention.

# Key evaluation question findings<sup>1</sup>

## 1.1 How well do students achieve?

Performance:	<b>Good</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>Students learn scuba diving at working dive shops offering services to the public. Over 60 per cent of students enrol on the scuba instructor programme and close to 75 per cent gained the diving qualification (2016-2018). This is a strong result. The part-time Marine Academy programme introduces secondary school students to diving. Close to 90 per cent gain the qualification; a very strong result.</p> <p>Across all Academy programmes, non-Māori students achieve at higher rates than Māori, who made up nearly one-quarter of enrolments in 2018.<sup>2</sup> The gap in qualification completions of between 9-16 per cent (2014-2017) was significant<sup>3</sup> and generally an increase since the last EER.</p> <p>Students learn relevant dive and first aid knowledge, skills and attributes, as well as valuable 'soft' people-related skills. Assessment and moderation practices give overall confidence in the reliability of the achievement results.</p> <p>Self-assessment of achievement has been variable. There has been little analysis of programme-level results, including comparing the nine training sites. Results are not benchmarked against previous years or relevant external measures. There has been no tracking or action to close the achievement gap between Māori and non-Māori students, as required.<sup>4</sup></p>
Conclusion:	Results are at least strong for the two focus area programmes. However, the coverage, understanding, use and quality of achievement information is mixed. This negatively impacts the performance rating for this key evaluation question.

<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.

<sup>2</sup> Few Pasifika students enrol on the training programmes.

<sup>3</sup> The gap between Māori and non-Māori, if analysed, would be larger.

<sup>4</sup> [How NZQA evaluates educational performance in external evaluation and review](#)

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

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Graduates of the largest Academy training programme gain valuable international certification as both scuba instructors and emergency care first responders. These graduates have additional capability sought after by the Australian and South Asian industries, due to the extended duration of the training and exposure to more demanding and diverse dive environments. The generally sound analysis of graduate destinations shows that around half gained some industry-related work in 2017 and 2018 (including working for the training sites); around 10 per cent went on to further education. The outcomes for Māori were better than for non-Māori.</p> <p>The Marine Academy graduates gain international certification as foundation-level divers. Personal growth and learning soft skills were significant outcomes for these students, a number described the training as 'life-changing'.<sup>5</sup> The programme is a key factor in retaining these students at school. Many 2017 and 2018 graduates went on to higher-level education or work, some industry-related. These outcomes were of high value to the school principal interviewed. The training delivery, along with the associated dive shop operations, contribute to the local economy and community. The above outcomes for both programmes are first rate.</p> <p>There is a rich understanding of the industry and the students. Though there were a few self-assessment gaps, none were significant. The feedback on graduate capability is not systematic and the analysis of graduate destinations, while sound, is not high quality.</p>
Conclusion:	There are outcomes of high value for the graduates, the New Zealand and international dive industry, the school partners and local communities. Self-assessment is generally high quality and supports high performance.

<sup>5</sup> These outcomes also applied to the scuba instructor programme.

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

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Academy programmes embed internationally recognised dive and first aid certification leading to NZQA qualifications developed to match local industry needs. The use of international learning materials and assessments ensures the programmes stay current with international best practice. Delivery taking place within an operating dive shop setting offers students (under close supervision) repeated opportunities to apply their learning in a dynamic real-world context, including a range of dive environments.</p> <p>The Academy responds to, and at times leads, changes within the dive industry, contributing significantly to the development of new dive qualifications.<sup>6</sup> The PTE recently gained approval and delivered the New Zealand Certificate in Retail (Level 3) to upskill students working in retail dive shops. Recent graduates demonstrated they had acquired the graduate profile outcomes.<sup>7</sup> The PTE has gained approval for a first aid programme and is currently developing another for a soon-to-be listed dive qualification.</p> <p>Other self-assessment practice is sound. Detailed periodic internal audits systematically verify that quality standards are being met at each site. Assessment and moderation practices are robust, though the moderation coverage is not comprehensive. There was some evidence of good or innovative practice being shared across the organisation. Students complete a detailed evaluation of their learning experience; it is not clear how these inform ongoing quality improvements.</p>
Conclusion:	The programmes continue to match well the needs of the students, industry and other key stakeholders. Self-assessment practice is strong, and the few gaps have limited impact.

<sup>6</sup> The Academy is the largest provider of dive programmes in New Zealand.

<sup>7</sup> The Academy graduates met the required threshold in the [Consistency Review](#) process.

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

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>The trainers are nationally and internationally certified dive and first aid instructors. They have the required technical and interpersonal capabilities, typically using a supportive mentoring approach. The classes and sites are small, and students interviewed value being individually known and being treated as equals.</p> <p>The high school principal interviewed by the evaluators was clear: the Marine Academy programme retains students who would likely otherwise leave school. Qualification completion rates across all programmes are consistently at least strong, demonstrating that the strategies in place are mostly effective. As noted, rates for Māori are lower than for non-Māori and there are no specific strategies to improve their outcomes. Students evaluate individual instructors; however, the results were not clear or how feedback contributed to ongoing improving performance. These self-assessment gaps mean there is some reservation about overall performance in this area.</p>
Conclusion:	Most, but not all students are effectively supported to stay engaged and complete their studies. Self-assessment is generally sound; however, the gaps have had some impact.

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

Performance:	<b>Good</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>The Academy has a clear and well-established purpose: training students in dive and first aid to work effectively in dive-related industries. The PTE's leadership, organisational structure and sustainable business model and operational procedures have mostly supported the organisation to accomplish this purpose. The organisation has responded well to external changes in developing a range of new programmes. The head office provides generally sound guidance and oversight of the nine delivery sites, supported by the board and the more experienced site managers.</p> <p>The internal audit system enables internal and external quality standards to be mostly maintained, but there have been a number of compliance gaps.<sup>8</sup> The audit process has led to few quality improvements being shared across the organisation; the latter was an issue noted in the last EER report.</p> <p>There is little evidence of achievement being systematically reported, informing reflection and decision-making and leading to organisational improvements. This is a gap in academic leadership. However, self-assessment has supported ongoing performance in other key areas including ensuring robust training meeting student and industry needs.</p>
Conclusion:	The leadership has been mostly effective in supporting strong and, in some areas, high-level performance. The quality of self-assessment practice and information varies, and this has sometimes impacted on performance.

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<sup>8</sup> See 1.6

## 1.6 How effectively are important compliance accountabilities managed?

Performance:	<b>Marginal</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>A detailed quality management system operates across the organisation to meet multiple regulatory requirements. Staff interviewed recognised that following and reviewing procedures is core business. Substantive annual audits (including site visits) are mostly effective in reviewing compliance. They found the required hours and activities are being delivered; the 2019 TEC audit agreed, finding no significant gaps. The Academy took appropriate action when an important gap emerged.<sup>9</sup></p> <p>However, there have been some gaps in managing compliance, two were significant. Māori student achievement has been insufficiently monitored and addressed.<sup>10</sup> Concerns, in 2016, about the assessment of adventure-based learning units led to an NZQA compliance notice and the PTE agreeing to suspend enrolments. The other gaps were: the annual statutory declaration had been incorrectly completed; unit standard results were not reported three-monthly; Code of Practice<sup>11</sup> procedures had been updated but not been fully reviewed<sup>12</sup>; and a case where the advertising and enrolment practices of a subcontractor did not meet the required rules.</p> <p>Dive training takes place in a high-risk physical environment. The Academy has effectively managed its key dive and health and safety requirements. The PTE says there have been no significant incidents nor faced any significant legal or ethical issues since the last EER.</p>
Conclusion:	The Academy has been effective in managing many, but not all, of its important compliance requirements. The review of compliance processes while generally sound, did not identify these gaps.

<sup>9</sup> A subcontracting agreement was terminated in December 2017.

<sup>10</sup> See 1.1

<sup>11</sup> [The Education \(Pastoral Care of International Students\) Code of Practice 2016](#)

<sup>12</sup> The gap was identified during the EER scoping; a sound review was completed before the site visit. The impact was minor as: there were just three international students (of 1,000 total enrolments) since the last EER; there were no concerns regarding student wellbeing.

# Focus Areas

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

## 2.1 Focus area: Diploma in Professional Scuba Instruction (Level 5); Certificate in Medic First Aid Career Instruction (Level 4)

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>

## 2.2 Focus area: Marine Academy National Certificate in Diving (Foundation) (Level 3)

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>

## 2.3 Focus area: International Student Support and Wellbeing

Performance:	<b>Good</b>
Self-assessment:	<b>Marginal</b>

# 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 Academy of Diving Trust:

- More robustly review achievement to support improvements, including tracking, reporting and action to close the achievement gap between Māori and non-Māori students.
- Analyse and report student feedback on their learning experience and their instructors to better inform periodic programme reviews.
- Consider ways to better share good practice across the PTE, including through the internal audit process.
- Strengthen the capability of the educational leadership.
- Improve the understanding of NZQA rules and regulations.
- Modify the audit process to:
  - include random sampling of key subcontractor activities
  - better review the key activities of Emergency Medical Planning NZ Ltd
  - review the head office management of key compliance accountabilities.

# 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.*

NZQA requires Academy of Diving Trust to:

- Ensure unit standard results are reported with three months of assessment.

See: [Consent to assess against standards on the Directory of Assessment Standards Rules 2011 \(v3-2018\) Part 2. Section 10.1b](#)

'To maintain consent to assess in respect of the entire consent or particular classifications or standards, holders of the consent (except relevant schools and ITOs) must: ... accurately report credits for students within 3 months of assessment, unless NZQA has approved a different reporting timeframe for the holder of the consent.'

# 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<sup>13</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>13</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.

## Regulatory basis for external evaluation and review

*External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.*

*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 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.*

*In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 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, 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 2016. 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)). 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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