



NEW ZEALAND QUALIFICATIONS AUTHORITY
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Report of External Evaluation and Review

Education & Training Consultants New
Zealand Limited trading as English
Teaching College

Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 4 October 2016

Final Report

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Purpose of this Report

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

Introduction

1. TEO in context

Name of TEO:	Education & Training Consultants New Zealand Limited trading as English Teaching College (ETC)
Type:	Private training establishment (PTE)
First registered:	30 June 1993
Location:	ETC's head office is located at 140-142 The Square, Palmerston North
Delivery sites:	140-142 The Square, Palmerston North 240 Willis St, Wellington 40 Bloomfield Terrace, Lower Hutt, Wellington
Courses currently delivered:	Domestic learners: <ul style="list-style-type: none">• New Zealand Certificate in English Language (Levels 1-4)• Intensive Literacy and Numeracy 100 hours and 200 hours – English for Speakers of Other Languages (ESOL) International learners: <ul style="list-style-type: none">• English for Academic Study Training Scheme• English and Demi Pair Training Scheme
Code of Practice signatory:	Yes, including young international group students

Number of students:	<p><u>Domestic</u>: 242 learners</p> <p>106 domestic learners in Palmerston North, 83 in Wellington, and 53 in Lower Hutt</p> <p>Approximately 60 per cent of Wellington and Palmerston North learners and 79 per cent of Lower Hutt learners are refugees. Approximately 20 per cent of domestic learners at each site are migrants.</p> <p><i>By programme:</i></p> <p>New Zealand Certificate in English Language – levels 1-2, 91 EFTS (equivalent full-time students); levels 3-4, 28 EFTS</p> <p>Intensive Numeracy and Literacy – 106 EFTS</p> <p><u>International</u>: 46 learners from diverse countries</p> <p>34 Palmerston North, 10 Wellington, two Lower Hutt</p>
Number of staff:	<p>Palmerston North staff: 16 full-time, eight part-time</p> <p>Wellington staff: nine full-time, four part-time</p> <p>Lower Hutt staff: four full-time</p>
Scope of active accreditation:	<p>Refer: http://www.nzqa.govt.nz/providers/nqf-accreditations.do?providerId=929095001</p>
Distinctive characteristics:	<p>Learners are predominantly refugees and migrants to New Zealand.</p> <p>Delivery of programmes across three sites.</p>
Recent significant changes:	<p>ETC experienced some key changes in 2015, including: the establishment of a new Lower Hutt site, a move to a new Palmerston North site, new programme approvals and delivery, and the introduction of a new student management system which is still being implemented.</p>
Previous quality assurance history:	<p>ETC's last external evaluation and review (EER) was in 2012. NZQA was confident in both ETC's educational performance and capability in self-assessment.</p> <p>ETC's national external moderation results were reported in November 2015. Assessment</p>

materials were approved for five out of six unit standards moderated. Assessment materials for one unit standard required modification. Assessor decisions were approved for six out of nine assessment samples reviewed.

ETC met all NZQA national moderation requirements in 2013 and 2014.

Other:

The English for Academic Study programmes are delivered to international learners with diverse learning needs and goals. For example, some international learners wish to undertake a short period of learning to practise and develop their English in a New Zealand context. Other learners enrol to prepare for international English exams (e.g. International English Language Testing System (IELTS), Cambridge English: Advanced).

2. Scope of external evaluation and review

Governance, management and strategy is a mandatory focus area. The following programmes were also selected as focus areas:

- New Zealand Certificate in English Language (Level 2)

This is ETC's main academic programme for domestic learners and is delivered across all ETC sites to level 4. The greater number of learners are enrolled at levels 1 and 2. The level 2 programme was selected as some learners interviewed have also experienced the foundation and level 1 programmes at ETC.

- Intensive Literacy and Numeracy 200

This focus area was selected because the Intensive Literacy and Numeracy-funded programmes have the highest number of ETC learners enrolled. The Intensive Literacy and Numeracy 200 funded programme has double the places of the Intensive Literacy and Numeracy 100 programme. It is a programme delivered across all of ETC's sites.

- English for Academic Study/Preparation for International English exams (academic English programmes)

This focus area encapsulates the main area of study for international learners.

3. Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published policies and procedures. The methodology used is described fully in the web document Policy and Guidelines for the Conduct of External Evaluation and Review available at: <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

Two NZQA evaluators spent three days at ETC: one day at the Wellington site and two days at the Palmerston North site. The evaluators undertook the EER synthesis off-site following the EER visit, as extra time was needed during the on-site visit to verify some areas of information. As such, the evaluators subsequently returned to the Wellington site to provide feedback to ETC to conclude the EER visit. The evaluators engaged with the following people during the EER visit:

- ETC managers and director
- Teaching staff
- Student support staff and ETC's off-site homestay coordinator
- Key local stakeholders
- Learners and graduates of ETC.

Documents reviewed by the evaluators included: ETC's self-assessment summary and data, ETC's quality services manual and a draft Wellington student services manual, management meeting minutes, student evaluation results, examples of cases where police vetting had been conducted, moderation information, staff performance appraisal information, a staff handbook, and student handbooks.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **Education & Training Consultants New Zealand Limited trading as English Teaching College**.

ETC is highly valued by its key stakeholders for its community contribution and the excellent job it does developing and delivering relevant programmes tailored to the needs of learners and key stakeholders.

ETC is meeting many of the most important needs of learners and key stakeholders through some effective processes contributing to learning and other important outcomes.

- Strong individual needs assessments are consistently undertaken and contribute strongly to the delivery of relevant programmes, teaching and learning, and work experience.
- Learners are individually guided and supported into work experience, employment and further training – ETC identifies that 72 per cent of domestic learners gain employment or progress to further study (though that figure is a mix of actual and intended outcomes). Outcomes for international learners are not as widely understood.
- Teachers are qualified, experienced and valued by learners for their knowledge, effective delivery and responsiveness.
- Learners' holistic needs are supported by caring staff and activities aimed at supporting community integration and wellbeing.
- Data available shows that learners achieve well in some programmes. ETC works with learners at the individual level to understand their ongoing progress and identifies that most learners achieve in their learning (though there is not collated self-assessment evidence to confirm this). However, data is not collated or analysed for some programmes across all sites to provide a full understanding of the extent of achievement at an organisational level (e.g. the academic English programmes).

There are gaps in ETC's recording of processes and information in some areas under the Code of Practice for the Pastoral Care of International Students (Code of Practice). There was no evidence of learners being put at risk. However, less than robust record-keeping meant it was not possible to verify verbal information that certain processes were occurring.

Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Education & Training Consultants New Zealand Limited trading as English Teaching College**.

ETC has a strong understanding of individual learner achievement. However, self-assessment is not sufficiently comprehensive. At an across-programme and organisational level, it is difficult to understand how well learners achieve in some programmes and to accurately assess the reasons for differences in achievement.

The organisation is yet to implement a facilitated process to regularly support staff to come together from across sites to share achievement information, strong practice and learnings. Staff are self-reflective and enthusiastic about the availability of such opportunities. ETC has a useful staff appraisal process in place which has identified a desire for better sharing across the organisation.

ETC has a variable understanding of how well it prepares learners for employment and further training. ETC asks learners about intended destinations before they leave ETC. The value of outcomes is partially understood through indirect discussions ETC has with key local stakeholders and through learners contacting ETC about their subsequent destinations. However, there are not self-assessment practices in place to systematically gain a full understanding of learner and stakeholder outcomes once learners leave ETC. The evaluators found out more about the value of outcomes from their own engagement with ETC's stakeholders rather than through ETC's own self-assessment information.

In a few key areas there are gaps in the recording of processes and information and which relies on the recall of individual staff members, for example, information on learner outcomes from work experience, employment and further study, and homestay and police vetting outcomes. This limits the data available for future reflection and to ensure key actions and activities are occurring. The better documenting of internal self-assessment information and further demonstrating the value added by ETC's work were suggestions previously made by NZQA in ETC's 2012 EER report.

ETC uses student evaluation feedback to reflect on the strength of teaching and learning and learners' overall experience at ETC. Teachers regularly use learner feedback and feedback from employers to improve and tailor teaching and learning activities. Examples were shared where organisational improvements have been made as a result of feedback (e.g. refurbishment and relocating to a new site).

Needs analysis at ETC is strong, and a lot of time goes into understanding learners' holistic needs to ensure relevant programmes and activities and to tailor these to individual needs.

In sum, while ETC has some effective self-assessment processes in place, its self-assessment system is not sufficiently comprehensive to enable a full understanding of the strength of performance in all key areas of the organisation's educational

delivery and activities. Some strong performance was evident. But the limitations of ETC's self-assessment system meant that the full extent of educational achievement and outcomes was difficult to understand in some areas or was better understood through the evaluators' own enquiries (rather than through ETC's self-assessment information). There were some unaddressed process gaps identified (e.g. Code of Practice matters) and less than robust analysis of the reasons for some variations in educational performance.

Findings¹

1.1 How well do learners achieve?

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

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

Across ETC there is a strong understanding of learner achievement at the individual student and class level (and achievement data is collected across sites and programme levels in the New Zealand Certificate in English Language programme). Teachers closely review achievement on a regular basis, identifying learners' progress in personal attributes and skills, including through observation, unit standard achievement and formative test results. Individual learner achievements are discussed between teachers and management.

However, at an organisational level there is more work to do to identify how well learners achieve across the organisation and comparatively at its different sites, and to understand reasons for lower and variable achievement across sites. As such, ETC's own achievement information made it difficult for the evaluators to verify strong achievement across all of ETC's delivery.

New Zealand Certificate in English Language (NZCEL)

For the NZCEL programme, ETC views course completion information as the better indicator of achievement based on the four Tertiary Education Commission (TEC) educational performance indicators. ETC considers course completions in the 80 per cent range to be a satisfactory result, with a particularly strong result being in the 90 per cent range. Solid performance was achieved for TEC SAC (Student Achievement Component)-funded courses in 2013 and 2014:

- 2013 – course completions were 82 per cent
- 2014 – course completions were 93 per cent.

Table 1 shows 2015 course completions for the SAC-funded NZCEL programme across the four levels delivered in each of ETC's three sites (the figures in brackets show course completions by course numbers).

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

Table 1. ETC's NZCEL course completions across sites, 2015

	Foundation	Level 1	Level 2	Level 3	Level 4
Across all sites	80% (198/248)	86% (180/210)	82% (212/259)	62% (99/159)	71% (20/28)
Palmerston North	65% (44/68)	92% (72/78)	83% (76/92)	54% (51/95)	71% (20/28)
Wellington	96% (92/96)	96% (96/100)	91% (80/88)	100% (36/36)	Not delivered
Lower Hutt	71% (60/84)	38% (12/32)	74% (56/76)	43% (12/28)	Not delivered

Source: ETC

As the above table shows, while some strong results were achieved in 2015, particularly for level 1 and 2 programmes in Palmerston North and Wellington, the strength of achievement across sites and programme levels is variable.

Results in Lower Hutt were particularly lower in the level 1 and level 3 programmes, though learner numbers were small, and four of eight learners in Level 1 left for reasons outside of ETC's control.

In Palmerston North, achievement was under the desired 80 per cent range for the foundation-level and level 3 programmes. ETC advised that the Wellington 100 per cent Level 3 result could reflect that some learners may have been better enrolled at Level 4 (but that level was not on offer at that site in 2015).

Several reasons were put forward by ETC to explain the variance in achievement across courses and sites, but the evaluators did not consider the analysis and rationale underlying these reasons to be strongly presented. Hence, while this is the one programme where ETC does collect achievement data at an across-organisational level, and has reviewed variable achievement, the analysis of reasons for trends and patterns has not been robust.

Intensive Literacy and Numeracy

Course completions in the Intensive Literacy and Numeracy programme seemed to be solid in 2015: 90 per cent for Wellington and Lower Hutt, and 80.7 per cent for Palmerston North. It is not clear why there is some variance in results across sites, and the Wellington and Lower Hutt figure is shown as one result. Results are not separated out for the Intensive Literacy and Numeracy 100 (100 hours delivery) and Intensive Literacy and Numeracy 200 (200 hour) programmes.

All learners interviewed in the Intensive Literacy and Numeracy 200 programmes discussed having previously had no or very limited ability to understand or communicate in English before commencing with ETC. Over a short period of time, they had become confident English speakers and could communicate in English at a much improved level.

A key way that teachers in Intensive Literacy and Numeracy programmes gauge learners' literacy and numeracy needs and progress is through students' individual learning plans and results from the literacy and numeracy assessment tool. (The tool includes the TEC Starting Points options appropriate for learners at or below

step one of the Learning Progressions for Adult Literacy.) Other measures of progress are completions of modules and unit standards, and progress to higher-class levels. Teachers discuss individual progress with learners and management.

Improvements in adult learning progressions is another tool used. Data showing improvements in reading and numeracy is captured at each site as a guide to inform teaching. ETC is aware of the limitations of adult learning progressions results for ESOL learners, and therefore does not use this data for comparative purposes across sites.

However, despite the focus on individual learner progression, there was no across-organisation data collated to understand globally, for example: how many learners achieve their learning goals for the period they enrol with ETC; how many enrol in and complete unit standards and ETC modules; and the extent to which learners progress to higher Intensive Literacy and Numeracy levels. As such, while the evaluators were told that learners do well and heard a number of stories demonstrating achievement, it was not possible to understand the breadth and extent of this achievement across ETC.

Academic English programmes (international learners)

At an individual student level, one key way teachers identify achievement in the Academic English programmes is by individual learner progress in formative and mock testing and gains achieved in reading, writing and listening.

At a management or organisation-level, there is not a body of information to show overall analysis of how well learners do in these programmes. Therefore, it was not possible for ETC to demonstrate the strength of delivery across the organisation.

The Wellington site identifies that 100 per cent of learners gain a score of B1 or higher in Cambridge English: Advanced exams. Palmerston North indicates that it has information on overall test score results for approximately 85 per cent of learners, but this information is not collated or used to gauge the extent of achievement, and nor was it presented during the EER.

Management appeared to have good information about individual learner goals and progress through regular discussions with teaching staff. The evaluators considered that such information could be collated at an organisational level to inform its understanding of how well learners achieve overall in these programmes.

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 **Adequate**.

Key stakeholders interviewed for this evaluation said they highly value the opportunities that ETC develops and provides to predominantly refugee and migrant learners, enabling these learners to effectively engage in education, sometimes for the first time ever in their lives. As a result, learners develop the confidence and skills that enable them to become integrated into New Zealand society and the local community.

It was common for Intensive Literacy and Numeracy 200 learners interviewed for this EER to describe being empowered by their learning, including to participate in their children's learning at school. Previously they did not have the English language ability or confidence to do so.

Stakeholders told the evaluators that ETC graduates were well prepared for further training and employment and had valued attributes such as a strong work ethic and positive attitudes. One stakeholder indicated that all ETC graduates who subsequently enrolled in higher study with the organisation successfully achieved. The evaluators heard consistently that ETC understood local employers' needs and only referred learners to employers for work experience when they were certain they would be suitable and ready for the role.

Nearly three-quarters of ETC's 2015 domestic graduates from across ETC's sites (72 per cent) are identified as having progressed either to further study (55 per cent) or employment (17 per cent). In some instances, this figure includes learners' intended rather than actual destinations. Nevertheless, it is notable that 42 per cent of learners progressed to further training within ETC.

The evaluators were told that in 2016, ETC plans to improve its understanding of learner destinations for Wellington and Lower Hutt graduates. This seems to be because there are a greater number of 'unknown' destinations for graduates from those sites than for Palmerston North.

ETC's self-assessment information states that it is important to know the relevance of courses to different destinations. However, the evaluators consider that ETC could do more to inform this understanding. ETC's knowledge of how well it prepares learners for further study and training is not purposefully assessed through systematic engagement with employers or other tertiary education providers. Rather, ETC's understanding of graduate progress beyond initial destination information comes from more general interactions with stakeholders and feedback that may be provided proactively by graduates.

Hence, other than initial destination information, ETC does not collate other outcomes information. This meant that the evaluation team's understanding of the

value of outcomes came from the interviews they undertook during the EER, rather than from ETC's self-assessment information. Better self-assessment information is needed to provide a full understanding of performance in this area. Further, given the limited data available showing achievement and outcomes for international learners, the evaluators found a gap in understanding in this area.

1.3 How well do programmes and activities match the needs of learners and other stakeholders?

The rating for performance in relation to this key evaluation question is **Excellent**.

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

ETC does an excellent job of matching local external key stakeholders' needs – two indicators being highly positive stakeholder feedback and regular stakeholder referrals of learners to ETC.

All stakeholders attending a stakeholder interview for the EER described multiple examples where stakeholders had come to ETC to discuss individual clients or groups of clients' needs. ETC has constantly listened and responded well so that it can tailor programmes and teaching to effectively match learners' and stakeholders' needs. Thus, although feedback is collected informally, it is sought purposefully and regularly to inform delivery and is used effectively to enhance teaching and learning.

A number of examples were shared showing how ETC has introduced additional course components in response to stakeholder feedback. The aim is to enhance the relevance of learning to ensure learners gain key employment skills and knowledge and preparation for further study. An example is introducing the option of vocational unit standards in Intensive Literacy and Numeracy and knowledge of general health and safety in employment. ETC is also valued for the advice it gives employers to best support learners' individual experiences in the workplace. Modules in the Intensive Literacy and Numeracy programme have been developed to prepare learners for academic study and to provide a relevant pathway.

The learning environment has been tailored to provide a familiar, welcoming and engaging place for learners, including a prayer room, opportunities to learn about and showcase different cultures, and kitchen facilities for shared meals and integrating cooking into numeracy and literacy education. Work experience opportunities are proactively sought in areas aligned to learners' interests.

Time is taken at pre-enrolment to understand learners' backgrounds, experiences, goals and personal circumstances to guide learners into specific programmes that will match their needs. Pre-programme placement decisions not only gauge learners' English language proficiency and study levels, but also take into account learners' wellbeing and current circumstances to ensure appropriate placement and support to minimise barriers to learning.

ETC understands the effectiveness of its placement test through a student evaluation question directly asking learners about satisfaction with programme placement. Student evaluations are undertaken six-monthly. Recent site refurbishment and a move to a new site is one example of a key change made as a result of learner feedback.

The evaluators considered that the recording of stakeholder feedback is one area that could be improved as a mechanism for ETC to track and ensure matched needs across stakeholders and sites, and as evidence of changes made. The collection and analysis of such information is important to understanding matched needs at an individual site level, and a key information source for decision-making and self-review at an organisational level.

1.4 How effective is the teaching?

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

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

Teaching is tailored to individual learners' needs and goals. Formative testing and learner and stakeholder feedback are used consistently by staff to inform teaching content, to gauge learner progress and to provide feedback to learners.

Teachers are qualified and experienced at teaching learners who have English as a second language. They hold attributes valued by learners, including being knowledgeable, patient, passionate and caring. These attributes encourage learners to actively participate in and pursue their learning.

ETC provides an effective and enjoyable learning environment. This was apparent from the consistently positive feedback provided by all learners interviewed for the EER, and the mostly positive student survey results. Encouragement of peer-supported learning, and a supportive learning environment also contribute to learners' confidence and progress.

Learner evaluation feedback is positive, although in 2015 satisfaction with lessons appeared to dip in Wellington – 47 per cent of international learners considered the lessons to be very interesting, as compared with 75 per cent in 2014 (although overall, 87 per cent did still find lessons to be satisfactory). Lower Hutt learners were more commonly neutral about their overall learning experience. Reasons underlying these results were not clear from ETC's self-assessment – possibly, some learners finding the speed of learning too fast in Lower Hutt may have affected overall results.

It was evident that the TEC adult literacy and numeracy assessment tool and learning steps are used consistently by teachers to understand learners' needs on an ongoing basis and to shape teaching. Currently a staff survey is being implemented about the use of the assessment tool to inform future professional development.

Professional development is supported and relevant to the programmes being taught, including opportunities to focus on use of the TEC assessment tool, NZQA modules and best assessment practice. It is intended that teachers at the Wellington and Lower Hutt sites will enrol in and complete the National Certificate in Adult Literacy and Numeracy Education in 2016, but this did not appear to be an expectation in Palmerston North.

Strengthening the robustness of internal moderation is an ongoing focus for ETC, and solid recent national moderation results are an indicator of this focus. ETC's moderation process could be further enhanced by management facilitating opportunities for staff to come together from across sites to share assessment experiences and learnings and to ensure moderation findings are shared with and inform the practices of all teaching staff.

Management has self-identified cross-site sharing as an area of focus through the staff appraisal process. The performance appraisal process is operating as a useful tool for reflection by teachers and management on areas of teaching strengths and areas for development and support.

1.5 How well are learners guided and supported?

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

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

ETC's strong pre-enrolment assessment process is effective in supporting learners into relevant programmes (see Findings 1.3). Learners receive an individualised orientation to ETC and receive a student handbook. Regular meetings and/or 'catch-ups' are held with learners to enquire about their overall wellbeing. Individual learning plans are prepared based on learners' goals and results of literacy and numeracy testing, and are used to understand learner progress.

Barriers to learning are minimised by support provided to learners to help them deal with external matters that could affect learning, e.g. accommodation issues, sorting financial support with Work and Income, and homesickness. Guidance is provided about pathway options, and learners are helped to find work experience opportunities and to attend open days and enrol at other tertiary providers.

Student evaluation questions are aimed at ensuring that ETC is delivering effective guidance and support, including in accordance with the information requirements of the Code of Practice.

ETC supports international learners into homestays, and it was evident that ETC pre-visits homestays and engages with learners about the suitability of the homestay and responds to concerns.

However, the evaluators were unable to sight any records to confirm advice that homestays are visited after a period in the placement and that police checks are

redone two-yearly. There was no collation or ongoing record of issues experienced by learners in particular homestays to ascertain ongoing suitability for learners. Related gaps in the recording of information are discussed in Findings 1.6 below.

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

The rating for performance in relation to this key evaluation question is **Adequate**.

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

ETC has an established process for checking its compliance with the Code of Practice which involves key staff across sites. However, the evaluators found two key areas where gaps in record-keeping meant it was not possible to confirm ETC's verbal advice that it engaged regularly with parents of international students under 18 years of age (as required by clause 13.6 of the Code of Practice) and that all homestay families were regularly police vetted and revisited.

The verbally stated processes for homestay checking and engagement with parents of international students under 18 years of age did not fully align with stated procedures in the Wellington site's student services manual and the head office quality systems manual. Further, there was no documented procedure regarding negative police vetting outcomes, or records of homestays that had received a negative check or where issues had been experienced.

Although the evaluators did not see any evidence of learners being placed at risk, less than robust record-keeping means the organisation cannot be fully confident that appropriate processes are always followed. This in itself puts the organisation at risk. It was apparent from ETC's own records that recording has been previously identified as an area to improve but has not been suitably addressed. However, the evaluators acknowledge advice from the Wellington site manager of immediate activities underway and in planning to respond to recording gaps identified.

ETC is transitioning to a new student management system, which it considers will contribute to improved and consistent record-keeping and information management. However, the new system is taking some time to be fully operational. During the EER, ETC was unable to provide the evaluators with reports from the system pertaining, for example, to international students. This raised concerns for the evaluators about ETC's ability to access its own records and to use information for the purposes of self-assessment. Because of weaknesses in documenting and recording information, the accuracy of information in some areas is dependent on staff recall. During the EER visit, the evaluators experienced instances where recall around some information was uncertain. This of particular concern for the organisation given its expansion across three delivery sites.

It was evident across all internal conversations conducted for the EER that staff would value facilitated opportunities to share performance information with

colleagues across the organisation's three sites. Therefore, it was good to hear that such opportunities were being considered by management following similar feedback from staff performance appraisals. Important to this will be management's determination of the key self-assessment information it requires to be consistently gathered and shared across sites in order to better inform an organisational understanding of the strength of educational performance at ETC.

Staff at ETC feel valued. They appreciate in particular the flexibility and freedom given to implement their own teaching delivery and teaching resources alongside guidance from course outlines and defined programme outcomes developed by ETC. Programmes and teaching are suitably resourced and professional development is supported and linked to key areas of teaching.

As stated in Findings 1.2, ETC is considered by stakeholders to be a highly responsive organisation that takes a partnership approach to tailor education opportunities for the benefit of learners and the wider community. Stakeholder and learner needs analysis is strong.

Focus Areas

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

2.1 Focus area: Governance, management and strategy

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

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

2.2 Focus area: Intensive Literacy and Numeracy 200

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: English for Academic Study/Preparation for external English exams

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

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

Evidence about achievement, outcomes and matched needs for this focus area was limited. In addition, identified reporting gaps relating to the Code of Practice affects ETC's self-review and reflection about how well it is meeting the needs of international learners who enrol in these programmes.

2.4 Focus area: New Zealand Certificate in English Language (Level 2)

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

NZQA recommends that Education & Training Consultants New Zealand Limited, trading as English Teaching College:

- Develop as a priority its quality systems and student services manuals to detail consistently across sites, and in full, requirements for 1) homestay checking and review, and 2) correspondence with parents of international learners under 18 years of age; and ensure all relevant staff understand these requirements.
- Implement, as a priority, an organisation-wide system that consistently records on an ongoing basis all aspects of police vetting, homestay checking and contact with parents of international students under 18 years of age.
- Strengthen the self-assessment system, including:
 - Determining a consistent approach to data collection and review across sites to understand the question of how well learners achieve at an organisational level across all programmes.
 - Developing a robust process to ensure management works together across sites to regularly analyse reasons for variations in learner achievement and outcomes information.
 - Introducing targeted stakeholder engagement and recording of information (including work experience activities) to better inform an understanding of how well learners are prepared for further study and employment once they leave ETC, and the value of outcomes to key stakeholders.
- Drive and facilitate opportunities for staff to come together across sites to share teaching practice and performance information.

Appendix

Regulatory basis for external evaluation and review

External evaluation and review is conducted according to the External Evaluation and Review (EER) Rules 2013, which are made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

Self-assessment and participation in external evaluation and review are requirements for maintaining accreditation to provide an approved programme for all TEOs other than universities. The requirements are set through the NZQF Programme Approval and Accreditation Rules 2013, which are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

In addition, the Private Training Establishment Registration Rules 2013 require registered private training establishments to undertake self-assessment and participate in external evaluation and review, in accordance with the External Evaluation and Review Rules (EER) 2013, as a condition of maintaining registration. The Private Training Establishment Registration Rules 2013 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

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

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the External Evaluation and Review (EER) Rules 2013.

The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

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

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz).

The External Evaluation and Review (EER) Rules 2013 are available at <http://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/EER-Rules.pdf>, while information about the conduct and methodology for external evaluation and review can be found at <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>.

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