

# Report of External Evaluation and Review

## Headquarters Hairdressing Academy Limited

Confident in educational performance

Confident in capability in capability in self-assessment

Date of report: 31 May 2011

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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

Location:	South City Mall, Cnr Hillside Rd and King Edward St, Dunedin
Type:	Private Training Establishment
First registered:	1994
Number of students:	Domestic: 36
Number of staff:	Four full time and one part time (30 hours per week) staff
Scope of active accreditation:	Headquarters Hairdressing Academy Limited (HHAL) is accredited to deliver the Certificate in Hairdressing Skills (Level 3), the Certificate in Hairdressing (Level 3), and the Certificate in Advanced Hairdressing (Level 4).
	HHAL also delivers and assesses unit standards towards the National Certificate in Hairdressing (Professional Stylist) (Level 4), the National Certificate in Hairdressing (Salon Support) (Level 3), and various foundation skills unit standards.
Sites:	One site in Dunedin
Distinctive characteristics:	HHAL is a private training provider serving Dunedin and the wider Otago region. Trainees have access to a commercial salon as well as their own training facilities.
Recent significant changes:	During 2010, ownership of HHAL changed and the organisation is now co-owned by two directors who are actively involved in running the organisation on a day-

	to-day basis, including tutoring.
	All tutors have completed the National Certificate in Adult Literacy and Numeracy Education (Vocational/Workplace). Three tutors have completed the National Certificate in Adult Education and Training (Level 5).
Previous quality assurance history:	HHAL was quality assured by NZQA by audit in 2007 and substantially met the quality assurance requirements in force at that time.
	HHAL responded late to NZQA national moderation for 2010. A moderation action plan has since been completed.
	HHAL has met all moderation requirements of the Hairdressing Industry Training Organisation (HITO).
Other:	HHAL works with Dunedin high schools in delivering STAR and Gateway hairdressing programmes.
	HHAL also offers a Foundation Skills in Hairdressing course. This is an intensive programme focussed on preparing 16-18-year-old trainees for further education and/or employment including further study or apprenticeships within the hairdressing industry. Trainees are encouraged to complete the National Certificate in Hairdressing (Salon Support) (Level 3) (75 credits).
	HHAL delivers hairdressing qualifications to prepare trainees for careers in hairdressing. Some trainees transfer to apprenticeships after completing the Certificate in Hairdressing Skills (Level 3) (118 credits). Others progress to the Certificate in Hairdressing (Level 3) (82 credits) and the Certificate in Advanced Hairdressing (Level 4) (62 credits).
	HHAL is contracted to HITO for the provision of off- job training and assessment for hairdressing apprentices from the wider Otago region, including those who are completing their National Certificate in Hairdressing (Professional Stylist) (Level 4).

### 2. Scope of external evaluation and review

The focus areas chosen were

- Foundation Skills in Hairdressing course. This is a 45-week course with an average of 11 trainees (Youth Training). HHAL has invested in a new teaching space for 2011.
- Certificate in Hairdressing (Level3). This 27-week programme is the second of three full-time programmes representing the learning pathway for trainees seeking employment as stylists in the hairdressing industry.
- Governance, management and strategy. This is a mandatory focus area.

#### 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: <a href="http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction/">http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction/</a>

The evaluation team consisted of one lead evaluator and an external evaluator. During the visit, the team met with the HHAL directors, two tutors, and 13 current trainees. In addition, the team spoke by telephone to two ex-trainees, two HITO staff, two employers, and one salon client. The team was on site for one and a half days.

HHAL has had an opportunity to comment on the accuracy of the report and submissions received have been fully considered by NZQA before finalising the report.

## Summary of Results

#### Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **Headquarters Hairdressing Academy Limited.** 

Trainees at HHAL achieve very good outcomes, from foundation skills through to level 4 certificate programmes. Students of varied academic ability and educational background are supported to succeed in suitable training pathways and to develop their personal, study, and work skills.

Over recent years, HHAL has met or exceeded the performance benchmarks set by the Tertiary Education Commission (TEC) for the programmes currently offered. Course completion and qualification achievement rates are high and employment outcomes are reasonable given the current economic environment.

The value and quality of the training provided by HHAL is respected by hairdressing employers and HITO for the relevance and currency of the skills learnt by trainees who progress to further study and/or employment in the industry. This recognition is reflected in the industry's willingness to provide work placements, to employ ex-trainees, and to use HHAL for off-job training provision for their apprentices.

Trainees at all levels benefit from a consistent focus on both academic and personal development. Foundation Skills trainees are particularly well supported in the development of life skills. A variety of initiatives are in place to ensure all trainees are fully engaged with, and supported in, their learning.

Teaching and assessment practices are varied and effective, and appropriate to the course content and learning needs of trainees. There is an appropriate mix of classroom and practical training, and the availability of a working salon with a variety of clients enhances the trainees' overall learning experience. In addition to technical knowledge, special attention is paid to the development of interpersonal skills and standards of personal presentation sought by employers in new employees.

HHAL is providing individual guidance and support for all learners within a supportive yet structured environment. This enhances both the well-being of the trainees and their educational achievement.

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

NZQA is **Confident** in the capability in self-assessment of **Headquarters Hairdressing Academy Limited.** 

HHAL has recently embarked on a process of self-review and is committed to ongoing improvement. New systems and processes have been introduced and a strong foundation established for the next stage of training development and organisational improvement.

While there is evidence of positive change, a more consistent focus on reflection and analysis of outcomes would enhance HHAL's capability in self-assessment. HHAL has begun to use comparative data (across years) to identify improvements to programme organisation and delivery. The extension of this approach to all programmes would improve HHAL's understanding of how well it is doing and identify priorities for change.

The HHAL tutorial team meets weekly to discuss the teaching programme and to monitor trainee progress. Tutors have implemented various systems for recording and monitoring individual trainee achievement and development. Greater consistency in monitoring trainee progress would improve the quality and accessibility of achievement information available to HHAL for self-assessment.

New approaches to teaching planning have been introduced for 2011 to improve consistency and efficiency in planning, delivery, and organisation. Tutorial performance is supported through monthly meetings and annual performance reviews as well as teaching observations and feedback. Both teaching and industry-related professional development opportunities are made available. Internal moderation processes have been reviewed and documented and will be implemented in full during 2011. HHAL is using external moderation results to make changes to teaching materials and methods.

HHAL communicates frequently with key stakeholders and is responsive to issues. There are regular opportunities for trainees to provide written and verbal feedback as well as via a formally elected student representative. Feedback is used to evaluate and improve teaching effectiveness. Reflection on trainee needs has led to the investment in an additional "home room" space for Foundation Skills trainees and a recently introduced programme for monitoring individual student well-being. Reviews of the impact of these initiatives are planned for year-end 2011 and will include tutor and trainee feedback and outcome analysis.

HHAL primarily relies on informal communication with employers, such as telephone or face-to-face contact, which is reasonable for an organisation of this nature and size. However, regular meetings with an advisory group comprising partner salons, which was established during 2010, would complement this approach to ascertaining industry needs. Furthermore, some systematic recording of employer feedback (formal and informal) would facilitate objective review and analysis.

The evaluation team was impressed with the directors' industry knowledge and commitment to quality training. HHAL has undergone significant change recently, in personnel, educational offerings, and business systems. A focussed approach to priorities will be important for achieving further organisational improvements and enhanced educational performance.

#### **TEO** response

HHAL has accepted the accuracy of the report.

## 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.

Trainees at HHAL achieve very good outcomes, from foundation skills through to level 4 certificate programmes. Students of varied academic ability and educational background are supported to succeed in suitable training pathways and to develop their personal, study, and work skills.

Over recent years, HHAL has met or exceeded the performance benchmarks set by the Tertiary Education Commission (TEC) for the programmes currently offered. Sixty-six per cent of trainees who enrolled on the Foundation Skills in Hairdressing course during 2010 are progressing to further education and/or have gained employment (TEC benchmark 60 per cent). HHAL reports that the average number of unit standard credits achieved in 2010 was 27 (TEC benchmark average of 20 credits). Thirty per cent of trainees successfully completed the National Certificate in Salon Support (Level 3) during 2010.

Qualifications were completed by 92.3 per cent of the trainees in the Certificate in Hairdressing Skills (Level 3), 66 per cent of the trainees in the Certificate in Hairdressing and 80 per cent of the trainees in the Certificate in Advanced Hairdressing (Level 4) during 2010.

HHAL is effective in developing trainees' learning skills and improving their personal wellbeing, as well as helping them to acquire theoretical and practical hairdressing knowledge and skills. Trainees in the Certificate in Hairdressing complete a 60-hour module called Salon Success, the outcome of which is a journal record of their growth in personal wellbeing and preparation for employment as a professional hairdresser. Foundation Skills trainees confirmed for the evaluation team the effectiveness of HHAL's approach in building their motivation and confidence in their ability to learn and achieve their goals.

HHAL is effective in achieving progression of trainees through the training pathway for hairdressing. Two trainees from the 2010 Foundation Skills course were accepted for full-time study in 2011, and the majority of trainees from the Certificate in Hairdressing Skills progressed either to a hairdressing apprenticeship or the next stage of full-time training at HHAL. Trainees are supported to follow the pathway most suitable for their skills and aptitudes to achieve their career and life goals.

The HHAL tutorial team is focussed on educational achievement and meets weekly to discuss the teaching programme and to monitor trainee progress. Tutors have implemented various systems for recording and monitoring individual trainee achievement and

<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.

development. One innovative example for 2011 is an individual photographic record, which will document both the practical work and personal development of each trainee enrolled for the Certificate in Hairdressing. However, greater consistency by both individual staff and across the organisation in monitoring trainee progress would improve the quality and accessibility of achievement information available to HHAL for self-assessment.

## 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 value of the training provided by HHAL is recognised by graduates, hairdressing employers, and HITO for the relevance and currency of the skills learnt by trainees progressing to further study and/or employment in the industry.

Trainees acquire useful skills and knowledge and are prepared for employment in a wide range of salons. They achieve unit standards and/or hairdressing qualifications and the majority progress either to further training or employment. Trainees and graduates spoken to by the evaluation team confirmed the additional value of the training in the opportunity to receive individual attention and to grow as people and as learners. Foundation Skills trainees were making progress towards study and work goals, which they had not achieved previously. All trainees appreciated the assistance given with individual learning issues as well as the focus on preparation for the workplace, which they expected would improve their employment prospects.

HITO reported overall satisfaction with HHAL training and trainee outcomes, notwithstanding the negative impact of personnel changes in 2010 on trainee satisfaction with the off-job training provision. HHAL maintains good relationships with HITO and the wider industry, demonstrating openness to constructive feedback. Examples were provided of HHAL's commitment to reflecting changes in technology, products, and work practices in their training and materials.

While the recent economic downturn has reduced employment opportunities, employers continue to confirm the value of HHAL training by offering trainees work placements or permanent employment and apprenticeships. Employers expressed confidence in the currency of HHAL training and their contribution to a skilled workforce.

HHAL primarily relies on informal communication with employers, such as telephone or face-to-face contact, which is reasonable for an organisation of this nature and size. However, regular meetings with the advisory group, comprising partner salons, which was established during 2010, would complement this approach for ascertaining industry needs. Furthermore, some systematic recording of feedback (formal and informal) would facilitate objective review and analysis.

HHAL contributes to its local community, operating a working salon with a number of long-standing and regular clientele who appreciate the friendly and relaxed atmosphere and

competitive pricing. A volunteer module in the Foundation Skills programme provides opportunities for these trainees to contribute from time to time to the local community. HHAL management is involved with the business community and professional bodies.

## 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.

HHAL is effective in ensuring that programmes and activities match the needs of learners and other stakeholders. This is achieved through a consistent focus on individual development and the priority placed on meeting industry needs for work-ready trainees and graduates.

The various courses and qualifications are at the right level for the targeted groups (primarily level 2, 3, and 4 unit standards on the New Zealand Qualifications Framework). The Gateway and Foundation Skills courses provide for entry into the professional certificates and apprenticeships, providing meaningful pathways for 16-18-year-old trainees. The full-time certificate programmes enhance the employment prospects of graduates by enabling them to offer intermediate-level skills and to immediately contribute to their employers' businesses. Block and day-release courses for off-job training enable apprentices to complete the requirements of their professional qualifications. Interviewees confirmed that HHAL was helpful and flexible in responding to the needs of individual apprentices such as those facing employment difficulties, or individuals seeking to return to industry after a break. Respondents also commented positively about HHAL's currency in respect of the techniques that are taught and the products that are used.

HHAL prioritises relationships and communication with trainees and is effective in meeting their needs. An interview and selection process assesses trainee suitability for, and commitment to, a hairdressing career. Specific literacy and numeracy testing is conducted to identify learner needs and to ensure appropriate support is available, including an individual learning plan if necessary. Maximum class sizes have been set in order to ensure an appropriate level of individual attention can be provided, especially for practical activities. Learner review time has been scheduled to check for understanding and reinforce learning. Regular formal and informal opportunities are available for trainees to provide feedback as groups or individuals. Staff regularly discuss trainee feedback and allocate time and resources to meet trainee needs and maintain progress.

Reflection on trainee needs has recently led to the investment in an additional "home room" for Foundation Skills trainees, including facilities for food preparation. A recently introduced programme for monitoring student well-being provides for trainees to systematically reflect on their sense of well being, their learning, and their relationships, as well as regular opportunities to talk with tutors. This includes a formal mentoring process. Reviews of these initiatives are scheduled for year-end 2011 and will include tutor and trainee feedback as well as outcome analyses. The findings will be used to refine and

improve HHAL's effectiveness in developing and supporting trainees' well-being and learning.

All trainees benefit from the access to a wide range of models and a real work environment in the HHAL salon, which prepares them well for working in a wide range of salons. The introduction of an employment-type contract and associated reward system was welcomed by trainees in the Certificate in Hairdressing as valuable practical preparation for the realities of employment relationships and employer expectations.

Extensive industry experience and frequent interaction with employers has enabled HHAL to gain an excellent understanding of the employee attributes and workplace behaviour sought by industry employers. Evidence was provided of changes made to course content and delivery to ensure courses and learning experiences address employer priorities such as trainee punctuality, personal presentation, customer service, and interpersonal skills. HHAL's training provision is generally well supported by industry, but the organisation's effectiveness in meeting these stakeholders' needs for trainees with usable skills could be enhanced by more systematic communication and periodic reflection and analysis.

While HHAL staff maintain informal and cordial relationships with many ex-trainees, there is no systematic follow-up of graduates. A more formal approach to tracking graduate destinations and to exploring the usefulness of their training experience at HHAL could usefully inform HHAL's programme development and delivery.

#### 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 at HHAL is generally effective, as demonstrated by the levels of unit standard achievement and qualification completion and the development of life and employment-related skills. Trainees at all levels benefit from a consistent focus on both academic and personal development.

Teaching and assessment practices are varied and effective and appropriate to the course content and learning needs of trainees. There is an appropriate mix of classroom and practical training, and the availability of a commercial salon with a variety of clients enhances the trainees' overall learning experience. In addition to theoretical knowledge and practical skills, special attention is paid to the development of the interpersonal skills and professional behaviours desired by employers in new employees. One innovative example for 2011 is an individual photographic record which will document both the practical work and personal development of each trainee enrolled for the Certificate in Hairdressing.

Trainees and ex-trainees confirmed their satisfaction with the learning environment which had enhanced their confidence and ability to learn. They liked the hands-on nature of the training and the variety of teaching methods employed. They enjoyed positive relationships with their tutors who they perceived to be knowledgeable and encouraging.

New approaches to teaching planning (planning diaries) and tutor performance (tutor observations) have been introduced for 2011 to improve consistency and efficiency in planning, delivery, and organisation. The teaching team works collaboratively, seeking each other's ideas and inputs on lesson plans and discussing what is working well in classrooms. Lessons are adapted to the particular needs and skill levels of trainees. An explicit focus on the progress of each individual learner contributes significantly to the positive outcomes at HHAL.

All tutors are experienced and suitably qualified in the hairdressing industry and in adult teaching and assessment, and have recently completed the National Certificate in Adult Literacy and Numeracy (Vocational/Workplace). Ongoing professional development is made available including in-house training on new products and techniques. Individual tutor performance is supported through monthly meetings and annual performance reviews (including learner feedback).

Teaching and assessment materials are appropriate to the programmes and have been reviewed to include literacy and numeracy components. Appropriate programme review processes are in place. Internal moderation processes have recently been reviewed and documented and changes will be implemented in full during 2011. HHAL is using external moderation results to make changes to teaching materials and methods.

#### 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.

HHAL is providing a very high level of individual guidance and support for learners. A variety of initiatives are in place to ensure all trainees are fully engaged with, and supported in, their learning and to enhance their educational achievement and well-being.

During 2011 HHAL is implementing a new framework for trainee feedback and mentoring. Trainees will regularly complete a self-assessment and feedback questionnaire (after the first week, then monthly, and then at the end of the course) which tutors will use to chart and track trainee well-being and personal growth. Tutors will use this knowledge to address individual needs, including individual mentoring. While this represents a significant investment in time and effort, it is also potentially a rich source of information for organisational improvement, as well as an illustration of the value added to trainees by this provider.

The skills and approach of the tutors are crucial to the educational achievement of trainees and their wellbeing, and different approaches are appropriate for different groups of trainees. Tutors strive to create a positive and encouraging culture, where behavioural expectations are clear and standards are maintained. Expectations of trainees are set out in comprehensive course handbooks, and these are reviewed in the first week of each course. Trainees who have been identified as having particular literacy or numeracy needs receive additional assistance if required. Tutors are open to questions and patient in helping trainees understand. Trainees and extrainees interviewed confirmed that they valued the level of individual attention and support they received. They particularly appreciated the tutors' helpful approach and accessibility. Trainees reported that the quality of their relationships with tutors had a positive impact on their motivation and commitment to their programme and the industry.

Trainee progress is recorded in various ways in each programme, such as a chart in the classroom, weekly progress reports, a photographic portfolio, or monthly printouts of credits achieved. In all cases, monitoring of individual progress provides motivation to trainees and recognition of achievement, but greater consistency across the organisation could improve knowledge about the achievement of each trainee cohort.

HHAL is effective in creating an inclusive learning environment. The election of a trainee representative who attends weekly meetings with tutors provides the student body with a voice. Weekly meetings of all trainees help to build a sense of the learner community, and from time to time external youth/wellness agencies attend to discuss their services. This approach contributes to building trainees' abilities to communicate and work cooperatively with others.

Trainees interviewed by the evaluation team understood that their training was helping them to prepare for a workplace. They particularly valued the access to HHAL's working salon and the off-site work placements. They are supported in their placements by regular follow-up visits and phone calls by their tutors and the opportunity to reflect on the employer feedback at the conclusion of the placement. Other useful preparation for the workplace included a mock contract incorporating a reward system, which provided opportunities to build understanding of employment relationships.

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

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.

HHAL has undergone significant change recently, in personnel, educational offerings, and business systems. The evaluation team was impressed with the directors' industry knowledge and commitment to quality training. A focussed approach to priorities will be important for achieving further organisational improvements and enhanced educational performance.

Ownership changes during 2010 have resulted in additional leadership and management capability for HHAL. The two directors have created a strong platform for quality training. They have a shared vision, values, and passion for their industry, as well as a commitment to improving trainee achievement and well-being. The focus on meeting the needs of learners was confirmed in all interviews with staff. This is reflected in the current organisational priorities and emerging positive outcomes for trainees.

Despite the challenging economic environment and emerging competition, HHAL is also well supported by the industry. A more systematic and wider-ranging approach to industry feedback and analysis would further enhance HHAL's ability to assess the effectiveness of changes and better meet stakeholder needs.

The directors have embarked on a comprehensive review of many aspects of the organisation and have adopted both systematic and innovative approaches. They have established good communication and planning practices, resulting in a cooperative, optimistic, and collegial working environment. The staff are actively involved in the change process and report that they feel valued and supported and are positive about the organisation's direction. They report a greater focus on quality and consistency and positive outcomes for trainees.

There is evidence of a strong commitment to engaging more regularly and in more meaningful ways with a wider range of external stakeholders. Partner-salon agreements, membership of professional bodies, employer evenings, and input from product suppliers are examples of this development.

HHAL has also recently introduced additional teaching management systems and continues to invest in professional development in support of its commitment to improve educational achievement.

The evaluation team sighted useful documentation and evidence of good organisation and systems, including minuted meetings recording decisions made and actions to be taken. Operational procedures are fully documented and support good educational and management practice. Processes have been established for prioritising investment in resources. Staff and trainees are satisfied with the quality of the facilities and teaching resources.

#### Focus Areas

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

#### 2.1 Focus area: Foundation Skills in Hairdressing

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: Certificate in Hairdressing (Level 3)

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: Governance, management, and strategyThe 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 implied or expressed within the report.

## **Further actions**

The next external evaluation and review will take place in accordance with NZQA's policy and is likely to occur within four years of the date of this report.

## Appendix

### Regulatory basis for external evaluation and review

Self-assessment and external evaluation and review are requirements of course approval and accreditation (under sections 258 and 259 of the Education Act 1989) for all TEOs that are entitled to apply. The requirements are set through the course approval and accreditation criteria and policies established by NZQA under section 253(1)(d) and (e) of the Act.

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 courses they own or provide. These criteria and policies are set by NZQA under section 253(1)(ca) of the Act.

NZQA is responsible for ensuring all non-university TEOs continue to comply with the policies and criteria after the initial granting of approval and accreditation of courses 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 policies and criteria 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 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 (<u>www.nzqa.govt.nz</u>).

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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