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External Evaluation and Review Report

K2 Corporation Limited trading as
Kershaw Training Enterprises

Date of report: 23 August 2019

About K2 Corporation Limited trading as Kershaw Training Enterprises

Kershaw Training Enterprises provides second-chance education to youth in Hamilton.

Type of organisation:	Private training establishment (PTE)
Location:	217 Commerce Street, Frankton, Hamilton
Code of Practice signatory:	No
Number of students:	<p>Domestic: up to 40 equivalent full-time learners in Youth Guarantee (around 80 individuals)</p> <p>Around 100 individuals undertake education in the six-week Intensive Literacy and Numeracy programme.</p> <p>Māori learners comprise around 80 per cent of all students. This means all statistics used in this report will largely reflect outcomes for Māori learners. New Zealand European learners comprise around 15 per cent of learners. Pasifika learners comprise around 5 per cent.</p>
Number of staff:	Seven full-time equivalents
TEO profile:	See: NZQA – K2 Corporation Limited
Last EER outcome:	Confident in educational performance; Confident in capability in self-assessment
Scope of evaluation:	All main programmes: Youth Guarantee (Building and Construction); and Intensive Literacy and Numeracy
MoE number:	9749
NZQA reference:	C33682
Date of EER visit:	6 and 7 May 2019

Summary of Results

Kershaw Training Enterprises is reassessing its educational offer. This is challenging for the organisation but positive in that it is allowing for a renewed focus on improving learning outcomes.

Not Yet Confident in educational performance

- Kershaw Training Enterprises has reduced its training offer since the last EER in 2015 due to poor course and qualification completion rates and/or poor learner uptake. Kershaw Training's self-assessment processes have not yet adequately addressed these matters.

Not Yet Confident in capability in self-assessment

- Kershaw Training Enterprises has strong support for its provision from learners and their whānau, and also from the community entities they work alongside. While there is recognition that Kershaw Training Enterprises provides a valued learning opportunity for learners who have been under-served in other parts of the education sector, there is also an opportunity to strengthen stakeholder contributions in course design and oversight.
- Kershaw Training Enterprises' tutors have appropriate skills and experience. However, there has been insufficient attention given to programme design and development, resulting in under-delivery of a key programme in 2018, and separate concerns being raised in a 2017 audit by the Tertiary Education Commission.
- Kershaw Training Enterprises has a strong focus on student wellbeing, and provides a number of supplementary support services to its learners.
- Kershaw Training Enterprises is reassessing its educational offer. This process needs to include a full review of delivery quality to ensure learners receive high quality services in existing and any new programmes.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Kershaw Training Enterprises mostly delivers Youth Guarantee programmes and re-engages learners into education. Since the 2015 EER, Kershaw Training Enterprises has:</p> <ul style="list-style-type: none"> • discontinued Youth Guarantee provision in employment skills • discontinued Youth Guarantee provision in business administration and computer skills • started but subsequently discontinued Youth Guarantee provision for the New Zealand Certificate in Foundation Skills (using dance as the medium of engagement) • maintained provision in building and construction.² <p>The discontinued Youth Guarantee programmes generally had poor course and qualification completion results and/or poor learner uptake. In one instance a programme was ended midway through its delivery cycle. In another case, delivery in 2018 was condensed to less than half of expected contractual arrangements.</p> <p>The remaining programme – building and construction, currently being delivered over the full 24-week cycle for 2019 – has evidence of positive learning outcomes. There is emerging evidence that most learners (over 80 per cent) are completing their courses and gaining qualifications, which are providing them with useful work and further learning opportunities.³ Most of these learners are Māori who have been previously underserved in other educational settings.</p>

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

² Aspects of this programme were delivered by a third party from September 2016 to August 2018.

³ Refer to Appendix 1 for further details.

	<p>Kershaw Training Enterprises also runs short-course training for learners to gain further literacy and numeracy skills (generally a six-week programme). Gains against formal literacy levels are being made for just under half of these learners, which is identified by the provider as ‘well below’ the contract target of 80 per cent. Successful outcomes in this programme have been falling since 2016.</p> <p>Kershaw Training Enterprises’ internal self-review documentation showed some evidence of reflection on these performance variables. The management team also recognises these issues and the need to address them, and was able to outline their strategies for making future improvements to strengthen delivery and learning outcomes.</p>
Conclusion:	<p>Overall learning achievement shows inconsistency of educational outcomes and variability in service quality and performance – such as early termination of programmes – which have not supported learner achievement and progression.</p> <p>Self-reflection on student achievements has not always been a process of continuous improvement led by management and informed by data. Kershaw needs to improve its strategic assessments in this area.</p>

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Kershaw Training Enterprises’ primary stakeholders are:</p> <ul style="list-style-type: none"> • learners and their whānau • community entities that it works alongside. <p><i>Learners and whānau</i></p> <p>Kershaw surveys learners and their whānau, including parents/caregivers, to gain their views about the services on offer. This generally shows high levels of satisfaction with the programmes.</p> <p>Learners interviewed for this EER also said the programmes were of high value to them and helped create employment</p>

	<p>opportunities. Learners in Huntly said they had limited educational options in that town and were grateful that Kershaw maintained its programmes. Along with educational benefits (literacy and numeracy), they said the programme also reduced social isolation.</p> <p><i>Community stakeholders</i></p> <p>Kershaw Training Enterprises works with a range of other education and social service providers. Some enrolments are from Youth Service, or directed from the courts, or are for students who have been excluded from school settings. Kershaw has maintained a significant evidential file which shows support across its community and from social agencies. Stakeholder groups directly contacted for this EER – such as the New Zealand Police Youth Services and an employment agency – reiterated this positive feedback about Kershaw Training Enterprises’ high value in providing opportunities for vulnerable youth.</p> <p>Kershaw Training Enterprises staff also noted a relationship with iwi, although it was described as emerging and based on personal contacts rather than being a formal organisational relationship. As yet, community stakeholders have not been involved in programme development.</p>
<p>Conclusion:</p>	<p>Evidence provided shows that Kershaw Training Enterprises is generally strong in meeting the needs of learner and community stakeholders. There is scope for stakeholders’ views to be canvassed and considered in more formal and regular ways, such as through stakeholder hui, open days, organisational-level memoranda of agreement, etc. There is also scope for Kershaw Training Enterprises to engage stakeholders in self-assessment and improvement processes including programme design, development and review.</p>

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p><i>Programme design</i></p> <p>Since the last EER there have been changes in the design and delivery of the Youth Guarantee building and construction programme. From September 2016 to August 2018, Kershaw Training Enterprises worked with another programme provider to deliver practical components. The advantage to learners and educational rationale for this was not set out clearly in self-assessment documentation, although Kershaw Training Enterprises considers it leads to increased learner outcomes.</p> <p>When the programme was brought back in-house (mid-2018), delivery was condensed for a period, with the programme timetable reduced from 24 weeks to 10-12 weeks. Kershaw did not discuss this with NZQA or apply for a formal programme approval change as required.⁴ The EER team was advised by Kershaw Training Enterprises that the programme has now been restored to 24 weeks of delivery for each cohort of students.</p> <p>In the Youth Guarantee building and construction programme, two cohorts of students are tutored simultaneously by a single tutor. That is, new students enter into a class with an existing cohort, and the tutor works to ensure both sets of learning needs are met. The benefit is that existing learners role-model good behaviour and provide some assistance and mentoring to new learners. Class sizes are kept low, with a tutor-to-learner ratio of up to 1:15 at present. This joint-cohort practice can be successful but relies heavily on having a highly capable tutor who is able to work across a mixed range of learning levels and competencies. In addition, another full-time staff member is on site to provide extra classroom assistance as required.</p> <p>Notwithstanding, further self-assessment is required to ensure all learners receive sufficient attention for their level of learning, and to ensure the tutor has a greater range of support options given this arrangement.</p>

⁴ A Type 2 programme approval change is likely to have been required for this.

	<p>For the intensive literacy and numeracy programme, Kershaw Training Enterprises has increased the number of learning hours available per individual from 100 to 300 hours.⁵ This change means the PTE is now in a better position to meet more of the educational needs of these learners.</p> <p>They have also adjusted assessment practices to show progress within literacy levels (not just from level to level). This is more appropriate for the range of learners who present with lower literacy.</p> <p><i>Programme delivery</i></p> <p>Kershaw Training Enterprises uses BCITO⁶ resources to guide the delivery of the Youth Guarantee building and construction programme. For practicums, Kershaw Training Enterprises focuses on smaller individual building projects which allow each learner to individually express their identity. This also allows them to create something physical which they can take away with them after the programme (a tangible reminder of success). This approach is valued by the learners.</p> <p>For the literacy and numeracy programme, Kershaw Training Enterprises uses a range of computer-based and paper-based learning activities. (There are only four computers at the Huntly campus and learners considered more were needed for their class.)</p> <p>The Tertiary Education Commission assessment tool is used to track learning outcomes. Games and role-play are important components to ensure learning is enjoyable. The tutors have significant educational experience and have collected a wide array of teaching resources to facilitate positive learning experiences. In the literacy and numeracy programme, there is also a focus on curriculum vitae preparation, again so that learners have a practical outcome alongside their educational progression.</p> <p>In both programme areas, tutors are experienced and have appropriate teaching qualifications and an appropriate industry background. A teacher aide has now also been engaged for delivery in Huntly, which is providing much-needed relief and classroom support to the main tutor.</p>
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⁵ This is due to an increase of 'hour' allocations by the Tertiary Education Commission.

⁶ Building and Construction Industry Training Organisation

	<p><i>Assessment and moderation matters</i></p> <p>For the Youth Guarantee building and construction programme, internal moderation has, at times, been undertaken by staff with limited experience in that teaching area and/or subject knowledge background. Kershaw Training Enterprises may need to review that practice. BCITO is conducting external moderation and there are no current matters arising.</p> <p>For the literacy and numeracy units NZQA provides external moderation. In early 2019, NZQA found Kershaw Training Enterprises did not meet national external moderation requirements in 2018. The PTE has subsequently developed an action plan to address concerns.⁷</p> <p>Kershaw Training Enterprises' self-reflection documentation does not readily identify these issues or the significance of issues arising in ensuring high quality provision.</p>
Conclusion:	<p>Kershaw Training Enterprises' performance in programme design and delivery has been variable. There have been gaps in the fullness of delivery, gaps in support for tutors, and failures in external moderation. In the case of condensed delivery during 2018, this does not meet minimum expectations. Overall, these matters have hindered delivery quality and created stress for staff. Kershaw's self-reflective processes have not comprehensively addressed these matters.</p>

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Kershaw Training Enterprises provides an inclusive learning environment whereby all learners are welcome and supported to advance themselves. The PTE's mission is 'educate to empower/whakaako hei whakamana'. Surveys of learners show over 95 per cent feel safe and that they are receiving support.</p> <p>Learners interviewed for this EER said they felt well supported. In their view, tutors were approachable, resources were suitable,</p>

⁷ It is possible some of the concerns raised by external moderation were more administrative than educational.

	<p>and the organisational culture was positive. Students were aware of programme components and their learning progress to date. However, individual learning plans had not been fully developed or used. Importantly, learners felt the activities were well matched to their circumstances and abilities; and they desired to continue learning.</p> <p>Kershaw Training Enterprises also provides ‘behind the scenes’ support to learners. For example, there is an open kitchen (if learners need a meal) and direct transport to courses (in Huntly) or bus passes in Hamilton. Limited recreational and games equipment is also on hand.</p> <p>Kershaw Training Enterprises has also recognised that driver licences are an important part of work-readiness, and so with another provider includes driver tuition in the study break for the building and construction learners.</p> <p>In addition, Kershaw Training Enterprises maintains an ongoing relationship with a recruitment firm, meaning many learners are able to undertake some work experience during their studies, which they value. This may also lead to more permanent work for graduates of the building and construction programme.</p> <p>The Kershaw Training Enterprises self-assessment documentation notes the student surveys but does not provide a full account of the support available or reflective comment on potential improvements.</p>
<p>Conclusion:</p>	<p>There is good evidence that Kershaw Training Enterprises has effective processes to support the learners. Self-reflective practice in this area is limited.</p>

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

Performance:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>Kershaw Training Enterprises is presently reassessing its educational offer. Programme changes over the last few years have resulted in job losses and role changes; and there was some evidence that this had impacted negatively on the morale and wellbeing of some staff. Kershaw Training Enterprises needs to develop further wellbeing and professional development opportunities for staff.</p> <p>Kershaw Training Enterprises has self-reflection documentation, an investment plan, a quality management system, a future strategic plan and management meeting minutes. Together these show the PTE's business and educational considerations. While these are positive, further development is required to present as a coherent whole. Self-reflection on the most important educational questions – such as how well students are doing – remains limited throughout the documentation. For example, management meetings have very little recorded evidence of an educational delivery focus and do not track student success and outcomes. Accordingly, the management team, while focusing on recovery activities, needs to also increase its focus on education quality. Examples of the importance of this include current gaps in external moderation processes, delivery against programme approvals, and tracking learner outcomes within cohorts (not just after learners have completed their studies).</p> <p>Organisational governance comprises a sole director, who is also a tutorial staff member. The PTE is seeking additional governance support. The evaluation team supports this action to relieve pressure on the director and allow for a stronger focus on tutorial duties.</p>
Conclusion:	Kershaw Training Enterprises does not presently have effective governance and management systems that support educational achievement. Self-reflective practice in this area has also been limited, allowing for gaps such as under-delivery and incomplete moderation processes.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Poor
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Kershaw Training Enterprises has a range of accountability systems to ensure compliance with educational and wider regulations. This includes health and safety policies and procedures, staff performance management systems, a student complaint system, and a student record system. There is some evidence that the wider quality management system is used to guide the development and application of these policies. Overall, this approach is useful and relevant to ensuring the management of accountabilities.</p> <p>In 2017 the Tertiary Education Commission undertook an audit of Kershaw Training Enterprises. The audit report found a number of compliance issues arising in relation to how the PTE was delivering against its investment plan. Kershaw Training Enterprises has now responded to these matters with an action plan that addresses the findings.</p> <p>Notwithstanding, this EER has also found an area of unmanaged accountability in programme delivery (refer 1.3). Kershaw Training Enterprises had not, at the time of the EER, discussed this matter with either NZQA or its funder, the Tertiary Education Commission.</p>
Conclusion:	Kershaw Training Enterprises' management of key accountability matters has some unacceptable weaknesses and does not meet minimum expectations. Self-assessment in this area has only been partially effective in embedding process improvements to protect learner outcomes.

Focus Areas

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

2.1 Focus area: Youth Guarantee (Building and Construction)

Performance:	Marginal
Self-assessment:	Marginal

2.2 Focus area: Intensive Literacy and Numeracy

Performance:	Good
Self-assessment:	Good

Recommendations

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

NZQA recommends that K2 Corporation Limited trading as Kershaw Training Enterprises:

- Develop proactive ways to monitor and assess learner achievements, as learners progress within programmes.
- Develop stronger opportunities for stakeholder views into programme design and delivery and review.
- Review existing programmes to ensure full compliance with delivery and assessment approval expectations.
- Incorporate learning outcome objectives within business planning.
- Increase the focus in management meetings on matters of educational delivery; including student outcomes, student support needs, resource sufficiency, compliance management, and assessment practices.

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 K2 Corporation Limited trading as Kershaw Training Enterprises to:

- In accordance with rules established under section 253 of the Education Act 1989, seek NZQA approval if there is any delivery deviation from the existing programme approval for the Youth Guarantee building and construction programme.

Appendix 1

Youth Guarantee destination outcomes 2018

Table 1. Level 2 Youth Guarantee Building and Construction 2018

	Total	Positive outcome	Employment outcome	Further education
Learners	71	56	10	46
Percentage		79%	14%	65%

Table 2. Intensive Literacy and Numeracy data 2018*

	Total	Positive outcome	Employment outcome	Further education
Learners	109	43	23	20
Percentage		39%	21%	18%

*There is some concern that some cohorts of learners experienced under-delivery in this programme therefore statistics must be understood in that context.

Appendix 2

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 fraud⁸*
- *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.*

⁸ NZQA and the Tertiary Education Commission 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). 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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