

Report of External Evaluation and Review

Academy Business Training NZ Limited
trading as Kingston Institute of
Business & Technology

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 21 July 2015

Contents

Purpose of this Report.....	3
Introduction.....	3
1. TEO in context.....	3
2. Scope of external evaluation and review	5
3. Conduct of external evaluation and review	6
Summary of Results	7
Findings.....	8
Recommendations.....	15
Appendix	16

MoE Number: 9860
NZQA Reference: C13750
Dates of EER visit: 28 and 29 August 2014

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:	Academy Business Training NZ Limited trading as Kingston Institute of Business & Technology (Kingston)
Type:	Private training establishment (PTE)
Location:	Level 8, ACB Backpackers Building, 229 Queen Street, Auckland
Delivery sites:	As per location above
First registered:	August 1994
Courses currently delivered:	<u>Kingston's own accreditation</u> <ul style="list-style-type: none">• Academy Business Training Certificate in English (Level 3)• New Zealand Certificate in English Language (General) (Level 3) <u>Sub-contracted by UCOL for delivery</u> <ul style="list-style-type: none">• UCOL Diploma in Information and Communications Technology (Applied) (Level 5)• UCOL Diploma in Information and Communications Technology (Applied) (Level 6)• Certificate for Advanced Computer Users (Level 4)
Code of Practice signatory?	Yes, for learners 18 years of age and above; also approved for study tour groups of learners aged between 13 and 17 years

Number of students:	Approximately 150 international learners per year (37 at the time of the on-site visit)
Number of staff:	Management, administration and marketing: 11 Academic: seven
Scope of active accreditation:	<ul style="list-style-type: none"> • New Zealand Certificate in English Language (Level 2) • National Certificate in Computing (Level 2) • National Certificate in Computing (Level 3) • National Certificate in Contact Centre Operations (Level 3) • National Certificate in Contact Centre Management (Team Leader) (Level 4) • National Certificate in Business Administration (Level 4) • Certificate in General Secretary Skills • Certificate in Executive Secretary Skills • Certificate in Basic Computer and Office Skills
Distinctive characteristics:	<p>Learners' ethnicity: mainly Chinese, Korean, Chilean and Vietnamese</p> <p>All English learners enrol in the Academy Business Training Certificate in English programme, although most elect not to complete the qualification (requires 120 credits), but instead focus on acquiring sufficient English skills for the pursuit of further pathways (higher education, employment or settlement in New Zealand).</p>
Recent significant changes:	<ul style="list-style-type: none"> • Ownership was changed very soon after the previous NZQA external evaluation and review (EER). • The focus of the PTE shifted after the change of ownership, from providing levels 2, 3 and 4 foundation business administration skills to domestic learners, to one that markets to international learners. • Awarded a contract by UCOL (Universal College of Learning) in 2014 to deliver, in Auckland, levels 4, 5 and 6 programmes in information and

communications technology.

Previous quality assurance history:	<p>The previous EER was conducted in 2010. NZQA was Confident in both the PTE's educational performance and capability in self-assessment.</p> <p>The results of the 2013 NZQA national external moderation of unit standards offered by Kingston were unsatisfactory. Four of six unit standards' pre-assessment materials required modification and three of six unit standards' assessor decisions did not meet national external moderation requirements. Kingston was required to submit an improvement plan on moderation practices.</p> <p>An application for new programme approval was declined by NZQA in early 2014, despite receiving three additional submissions of supplementary materials.</p>
Other:	<p>Kingston receives no external funding support from government agencies, except where a payment is made by UCOL as per the sub-contracting agreement.</p>

2. Scope of external evaluation and review

The scope of this EER included the following mandatory focus areas:

- Governance, management and strategy
- International students

The other focus area selected was:

- Academy Business Training Certificate in English (Level 3)

At the time of scoping the EER, all learners were enrolled in this programme.

- Sub-contracting arrangement with UCOL

At the time of scoping the EER, the evaluation team was advised that sub-contracted delivery was planned to commence in August 2014 (just before the on-site visit). As this is likely to become one of the core businesses of Kingston, the evaluation team was interested in exploring the preparedness of the institute for meeting its contractual obligations for delivering the UCOL programmes. It was mutually agreed between the evaluation team and Kingston that this focus area would be on processes, not outcomes.

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.

NZQA brought forward this EER to 2014 because of the significant changes the institute went through since the previous EER (as noted in previous section).

Self-assessment materials were delivered to NZQA in a timely fashion to inform the scoping of this EER. Prior to the scope of the evaluation being finalised, the lead evaluator met with the chief executive officer of Kingston in person to agree on the focus areas and logistics of the on-site visit.

The evaluation team comprised two evaluators. The on-site visit was conducted over two full days. Interviews were held with the chief executive officer, an external advisor, the head of the English department, all English teachers, all administration and pastoral support staff, seven English learners and all three learners on the UCOL programme. A wide range of documents was sampled throughout the evaluation. The lead evaluator returned to Kingston for an additional half hour the week after the on-site visit for further clarification of documents and the immigration status/attendance of selected learners. The lead evaluator also contacted a number of stakeholders by phone after the on-site visit.

Summary of Results

Statements of confidence on educational performance and on capability in self-assessment

NZQA is **Not Yet Confident** in the educational performance of **Academy Business Training NZ Limited trading as Kingston Institute of Business & Technology**.

NZQA is **Not Yet Confident** in the capability in self-assessment of **Academy Business Training NZ Limited trading as Kingston Institute of Business & Technology**.

NZQA is unable to express confidence in Kingston at this stage because:

- The evaluation team is doubtful of the overall management capability of Kingston at senior level. Self-assessment is rudimentary in some areas; there is no clear link to establishing informed decision-making leading to improvements in practices as a result of analytical findings; the quality of programme approval applications submitted to NZQA is inconsistent; Kingston demonstrates a lack of understanding of some aspects of the Code of Practice for the Pastoral Care of International Students (Code of Practice) and immigration compliance requirements; and some of the review processes in place appear ineffective.
- The evaluation team was informed that a number of processes have been implemented or updated recently (such as the use of a new placement test and modified learner survey questions). The institute is innovating in the right direction – it is noted that it is too early to see the impact of such innovation. Evidence of improved outcomes is essential to the EER process.
- There is inconsistency in learner achievement, even when the evaluation team disregard the flaws in programme design that the new ownership inherited. The effectiveness of academic and pastoral support is not clearly demonstrated, and some of the non-achievement noted by the evaluation team is of concern.
- At the time of the site visit, Kingston was not meeting its contractual obligations under the sub-contracting agreement with UCOL, in terms of having the required facilities on site as stipulated under that agreement.
- Kingston misled the evaluation team by not advising the existence of one learner enrolled in the National Certificate of Business Administration (Level 4), a programme which Kingston did not have the capability to teach or assess at the time.

The evaluation team identified some positive features during the evaluation, such as the effort made, and success demonstrated, in tracking graduates. English teachers are qualified (and most have extensive teaching experience), and the learners are generally satisfied with the teaching, their own achievement, and their experience at Kingston. However, these findings did not ameliorate the concerns outlined above.

Final Report

Findings¹

1.1 How well do learners achieve?

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 **Poor**.

The majority of learners acquire skills in English language speaking, reading, writing and listening. Some learners, depending on the class they are in, further acquire some New Zealand knowledge and very basic awareness of Māori language. The evaluation team is concerned that four out of 15 learners in 2013 demonstrated no progression at all in their English level, despite studying at Kingston for more than 26 weeks, according to the data presented by Kingston during the on-site visit, using Kingston's method in measuring progression.² Kingston reports that some learners opt to remain at foundation level for social reasons rather than advancing to the next level, even if qualified to do so. The evaluation team finds that this outcome has limited educational value. Other examples of learners making limited progress over extended periods of enrolment were identified through a review of the achievement data and interviews with learners. There is little evidence of meaningful analysis or reflection leading to effective teaching strategies for enhancing achievement in these cases.

Progression reports were presented to the evaluation team. Analysis appears descriptive, rudimentary and does not link to any improvement actions. For example, the institute advised that one of its findings in 2013 was that the optimal period of enrolment for learners is 19 to 26 weeks, as beyond that duration learners 'tend to lose focus and their minds begin to wonder' [sic]. There is no evidence Kingston discourages new learners from enrolling more than 26 weeks despite that finding.

Furthermore, Kingston's measurement of progression lacks coherency. Understanding of achievement is largely at teacher level. Management overview of achievement is partially impaired due to the introduction of a new approach to measurement during 2014 (namely monthly tests based on IELTS (International English Language Testing System) for levels 3 and 4, and comparisons to CEFR (Common European Framework of Reference for Languages) levels) which is not generating reliable information on learner progress. Kingston only became aware of such issues when they were pointed out by the evaluation team during the on-site visit. Furthermore, management is unable to compare learner progress across the PTE as different tests are used at levels 1 and 2. Such deficiency in self-assessment

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 The evaluation team noted contradictory evidence as to the enrolment period for two of these four learners.

may be a result of a lack of consistency and possibly capability in the academic leadership of this programme.

The Academy Business Training Certificate in English is a full-year, unit standard-based programme. While acknowledging that the majority of learners elect not to undertake the programme under its original designed form, the minority who choose to attempt the unit standards have very limited success in achieving the competency required (Table 1).

Table 1. Academy Business Training Certificate in English, 2012-2014			
	Number of attempts	Number of standards achieved	Success rate
2012	27	13	48.1%
2013	84	28	33.3%
2014 to date	32	6	18.8%

That said, individual pockets of good practice in understanding achievement do exist among members of the teaching team, and there is an opportunity for this to be shared. Students spoken to by the evaluation team corroborated student survey data showing that most students felt positive about their progress and achievements. However, overall, the evaluation team considers Kingston's performance on learner achievement is inconsistent. There is lots of room to improve self-assessment systems to gain a better, deeper understanding of educational performance and to use the findings to improve practice.

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**.

Kingston's staff make a lot of effort to track graduates. Learners are interviewed at exit point, with administration staff following up on graduate destinations regularly up to six months after completion of studies. Outcome destination data is collected and collated. The institute advises that approximately 60 per cent of the 2013 graduates have 'positive outcomes', including progression to higher education, employment or attaining residency status.

There is solid evidence that the majority of Kingston graduates felt their English skills had improved through their studies at Kingston and enabled them to further pursue their desired pathway. There is also evidence that, out of the 87 graduates for 2014 to date (being the commencement date of the on-site visit), 24 have progressed to higher education in other tertiary education organisations, including polytechnics and universities. The chief executive officer continues to invest significant time in

developing pathways for Kingston's learners. The signing of the UCOL partnership agreement is a successful demonstration of such efforts. There is also a formal agreement with another private training establishment for Kingston graduates to pathway to a university foundation course.

A careers advisor has recently been appointed to support the delivery of UCOL programmes. The effectiveness of this appointment is yet to be seen given that the first intake only commenced in August 2014.

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 **Adequate**.

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

The programme design and structure of the Academy Business Training Certificate in English is not meeting the needs of learners (see 'Distinctive characteristics' under 'TEO in context' and Findings 1.1). Kingston is aware of this issue through analysis as part of its self-review of programmes, and has been adapting to the changing needs by modifying course content to suit learner study objectives (such as introducing new textbooks and moving the emphasis away from completing unit standards). Kingston has also created, and received approval to deliver, new programmes towards the new qualification, New Zealand Certificate in English Language (Levels 2 and 3). While the new programme design remains based on unit standards, the overall credit value is halved – from 120 credits to 60 credits. The level 3 programme commenced delivery in August 2014, with the level 2 programme still to be delivered at the time of the EER. It is too soon to say whether the new programmes meet learner needs. However, the evaluation team is satisfied that the institute is doing what can be reasonably expected from a provider of this size and context for reviewing the relevancy of its programmes. Some other improvements, such as updating the initial placement tests (balancing the four language skills, moving away from the previous emphasis on vocabulary and grammar), are noted by the evaluation team.

In addition to the above, Kingston's performance under this key evaluation question is further constrained by limited resources. This will be discussed further in Findings 1.6.

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 **Adequate**.

Teaching is generally effective. Kingston's English teachers are suitably qualified. Some have extensive teaching experience. A number of teachers have notably

made tremendous efforts to patch the gaps in programme design relevant to the level they are teaching, establishing links between the four language skills in the new textbook to the relevant unit standards in the original programme design. This in part compensates for the instability in academic leadership for the English programmes up until the first quarter of 2014.

There is good rapport demonstrated between learners and teachers. A variety of activities are used to enhance the learning experience in the classroom. There is evidence of learning via out-of-classroom activities. There is also evidence of peer observation, internal moderation and staff appraisal by self-assessment as well as through managerial staff. The evaluation team is of the view that the systems for monitoring learning achievement could be strengthened and be used more consistently across the levels.

1.5 How well are learners guided and supported?

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**.

Learners express satisfaction in the support services at Kingston. The institute is strong in obtaining feedback from learners through regular satisfaction surveys, and there is evidence that the data collected is analysed and responded to. For example, additional dictionaries have been purchased following suggestions from learners during exit interviews.

Kingston is meeting the basic performance requirements as a signatory to the Code of Practice. Beyond that, some support services, such as counselling and career advisory, are good initiatives above and beyond the minimum expectations, especially considering the current size of the institute. However, the institute is unclear about the effectiveness of such services. For example, no direct evidence has been tendered on whether the counselling service has a direct positive impact on individual attendance – the evaluation team noted an example of a learner who appeared unmotivated, with support services becoming aware in March/April 2014, but who remained unmotivated in July/August. Another example is noted where a learner has been with the institute for around two years on language studies, but appears to have made very limited progress over that time. While some additional support has been offered to that learner, evidence of its effectiveness is limited.

Kingston was unable to produce a documented record of self-review of the Code of Practice for 2014 at the time of the evaluation team's on-site visit. This is a clear gap in self-assessment practice and demonstrates an impaired understanding of the Code of Practice by Kingston. Some of the review of supportive documents may not be effective as well, as certain information provided in the student handbook (last updated July 2014) remains well out of date and potentially risky to the welfare of learners. For example, the change in give-way rules in 2013 was not reflected in the

handbook: 'When turning left, give way (yield) to traffic crossing or approaching from your right'.

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

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

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

Kingston has been in the process of a major transformation since the change of ownership. It has significantly shifted its focus from offering entry-level administrative programmes, targeted at domestic learners, to that of diploma-level information technology programmes (with complementary pathways at both ends) targeted at international learners. This is effectively a new organisation compared with the one evaluated by NZQA three years ago. The change does not appear to be guided by any strategic planning, as the latest version of the institute's business plan tendered during the evaluation team's on-site visit was dated 2012. Subsequent to the on-site visit, Kingston supplied the 2013 and 2014 business plans. The evaluation team was not convinced that the business plans presented were effective strategic planning documents. For example, the 2013 business plan was an exact replica of the 2012 business plan – it refers to 2012 in the future tense, and discusses 'forecasted' enrolment numbers and financial performance in 2012. The 2014 business plan, recorded to be last updated in June 2013, also featured the same discussion on 'forecasted' performance for 2012.

The evaluation team is doubtful about the overall capability of the institute at senior level. While an education advisor has been engaged, the self-assessment system is still in its infancy. Many policies and processes have been recently implemented or updated, with their impacts on educational performance yet to be demonstrated over time. It remains unclear how some of the findings arising from self-assessment are used to inform changes in practice within the institute. NZQA has concerns about the quality of a recently submitted application for programme approval. As mentioned in Findings 1.5, there is no documented record of self-review of Code of Practice compliance for the reporting year ended August 2014. Overall, the evaluation team believes the institute can benefit from having a cohesive, comprehensive review and business plan with multiple sources of input, including those from experts with sound regulatory and compliance knowledge of the New Zealand education sector.

Subsequent to the on-site visit, the evaluation team received intelligence that one learner was enrolled at Kingston for the National Certificate in Business Administration (Level 4), commencing June 2014. The evaluation team was informed by Kingston on multiple occasions that the institute ceased delivering this programme following a comprehensive review of offerings in 2012/2013. The evaluation team pointed out the mismatch to Kingston. The facts were not disputed and Kingston advised that the learner is self-learning at home with materials supplied by the institute. Subsequently, Kingston tendered attendance records of the learner concerned. Notwithstanding some discrepancies observed between the paper-based

Final Report

and the electronic records, it does appear the learner attended the institute two days each week, up to 11 hours on each day, despite Kingston not having any qualified academic staff who can teach or assess the business administration programme at the time. While ultimately this is a matter for immigration authorities to follow up, it reflects on the capability of the institute's management and casts doubts on the legality and ethics of some of Kingston's business practices.

Kingston is severely lacking in resources. There are four classrooms, three of them small. Learners have access to three desktop computers outside the classroom. The larger classroom has about 10 computers for delivering the UCOL information technology programmes. The library has minimal resources. Office space and reference materials are insufficient for the academic team. While the evaluation team acknowledges that there is a proposal towards moving to a larger campus in 2015, no legal documents have been finalised to date to that effect. At the time of the EER, Kingston did not have a minimum of two 20-seat computer laboratories on site, as required under the UCOL sub-contracting agreement, for the delivery of the UCOL information technology programme which commenced in August 2014.³

³ Following the site visit, NZQA was advised that a variation to the agreement had been agreed with UCOL regarding the supply of computers.

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 **Poor**.

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

2.2 Focus area: International students

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

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

2.3 Focus area: Academy Business Training Certificate in English Language (Level 3)

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

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

2.4 Focus area: Sub-contracting arrangement with UCOL

The rating in this focus area for educational performance is **Not applicable**.

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

As agreed at the pre-scope meeting, the focus of the EER for this programme was on process, not outcomes, given that delivery only commenced in August 2014. The evaluation team is satisfied that appropriate processes are in place to monitor and ensure educational success for the sub-contracted programmes. For example, a consultant with extensive background and experience in the education sector has been engaged as the in-house programme leader for the UCOL programmes at Kingston; an orientation week occurs for new learners, where relevant academic skills are taught and further need of English support (if required) is identified; decisions on hiring of lecturers are jointly made by UCOL and Kingston; comprehensive preliminary training by UCOL for Kingston staff is evidenced; a careers advisor is employed to look after the employment pathways for learners; ongoing communication, monitoring and reporting between UCOL and Kingston are in place.

The only issue identified by the evaluation team is Kingston's compliance with the facility requirements as stipulated in the sub-contracting agreement (see Findings 1.6).

Recommendations

NZQA recommends that Kingston Institute of Business & Technology:

- Identify, as a matter of urgency, learners who make slow or no progress at all for a considerable time, and provide the necessary support to ensure future educational success.
- Ensure offers of place are only issued for programmes that Kingston has the capability to deliver throughout the period of enrolment.
- Strengthen the coherence and consistency of curriculum and assessment across the English language programme delivery.
- Build capability and enhance the knowledge of the New Zealand education sector regulatory framework at the senior level of the institute.
- Review the self-assessment system and establish processes to ensure any findings from data analysis actually inform decision-making.
- Reconsider the cycle of business plan updates, so that plans are current and remain useful as a strategic guidance for the future.
- Explore ways to ascertain the effectiveness of academic and pastoral support services.
- Strictly adhere to the self-review requirement of the Code of Practice.
- Improve internal capability to minimise the possibility of any misunderstanding of the EER process, methodology, and questions from evaluators in the future.

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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Final Report