



Mana Tohu Mātauranga o Aotearoa
New Zealand Qualifications Authority

External Evaluation and Review Report

Academy Business Training NZ
Limited trading as Kingston
International College

Date of report: 10 August 2023

About Academy Business Training NZ Limited trading as Kingston International College

Academy Business Training NZ Limited (Kingston) delivers English language training (up to level 4) on the New Zealand Qualifications Framework, to international students.

Type of organisation:	Private training establishment (PTE)
Location:	Level 1, 17 Albert Street, Auckland
Eligible to enrol intl students:	Yes
Number of students:	International in 2022: nine students, 4.56 EFTS (equivalent full-time students)
Number of staff:	Six full-time
TEO profile:	Academy Business Training NZ Limited The programmes offered by Kingston are mainly for students wanting to improve their English language ability to enable them to enrol in further studies at other tertiary education organisations. English Language Training Schemes – Kingston has ceased delivery of NZCEL (New Zealand Certificate in English Language) as the qualification is not fit for purpose for Kingston learners, who only need to enrol in short courses to improve their English sufficiently to meet entry requirements for further study, rather than the entire 24-week programme. A suite of English Language Training Schemes was approved in 2021.
Last EER outcome:	In 2016, NZQA was Confident in Kingston’s educational performance and capability in self-assessment.
Scope of evaluation:	Kingston English Language delivery of programmes/courses for 2017-19, also covering the training schemes delivered in 2022:

- Kingston English Language Training Scheme Elementary Level 1
- Kingston English Language Training Scheme Pre-Intermediate Level 2
- Kingston English Language Training Scheme Exam Preparation Level 4

International student support and wellbeing

MoE number: 9860
NZQA reference: C51015
Dates of virtual EER visit: 1 and 2 December 2022

Summary of results

Kingston provides valuable training in English language, with some beneficial outcomes beginning to emerge for its students since the Covid outbreak. Effective leadership and emerging performance and self-assessment practices underpin the educational achievement for the small number of students enrolled so far, and inform decisions and actions taken.

Confident in educational performance

- Kingston has an experienced chief executive and a well-aligned management team that is focused on sustainable rebuilding of the business after Covid decimation. The team also has a good awareness around managing innovation and development while at the same time planning for the future.

Confident in capability in self-assessment

- Overall achievement for 2017-19 is good at 75 per cent, although initially the records showed an incorrect higher proportion of achievement, which suggests variable performance oversight and a lack of effective analysis. Purposeful and correct data provided for 2022 shows good outcomes and tracking of student progress.
- Kingston did not enrol learners from 2019 to 2021. In 2022, nine learners were enrolled, with three graduates. As such, evidence around the value of the outcomes for students is limited. Kingston has yet to demonstrate sustained quality in the delivery of the training schemes.
- Kingston is providing up-to-date English language learning to students using resources and facilities that match the needs of the learners and those teaching. Appropriate moderation policy and procedures would strengthen the academic integrity of the new provision.
- Well-qualified and experienced staff provide effective training with good outcomes, as noted by the learners, including more confidence and competence in their use of the English language.
- Kingston gathers feedback from the students through surveys. The results are aggregated and

used to identify trends (although these are emergent at this point and with small numbers).

- The PTE has carried out a self-review of the Code¹ and developed and applied effective practices to meet the required outcomes and processes set out in the Code.
- Kingston has the capability and expertise to offer the training schemes and will follow through on some relevant initiatives once they have the numbers.

¹ [The Education \(Pastoral Care of Tertiary and International Learners\) Code of Practice 2021](#)

Key evaluation question findings²

1.1 How well do students achieve?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Kingston offered NZCEL Level 3 General from 2017 until 2019, with a median completion rate of 78 per cent over the three years, above the benchmark the PTE had set itself of 75 per cent. This is a good success rate over that period with the small number of students enrolled. Kingston is aware of learners who self-identify and present with disabilities. At present this data is not formally collected for analysis and review to understand outcomes for this priority group.</p> <p>Initial completion and achievement data collection and analysis over the 2017-19 period was incorrect in that the withdrawals were not included in the overall outcome figures. This gave an incorrectly higher proportion of achievement, indicating variable educational performance and limited evidence of self-assessment to understand student success. Kingston has since corrected the record, and data is being analysed correctly for the 2022 year. Kingston is now using effective contributing processes and is collecting data that will enable them to identify trends in the future.</p> <p>No students were enrolled in 2020 and 2021 due to Covid. For 2022, Kingston has more carefully managed and monitored student achievement, supported by weekly formative course book progress tests and a six-weekly check. These checks include discussions between learner and tutor about progress before the final summative test at 12 weeks. Effective tracking of study weeks against proficiency gains will enable Kingston to carry out analysis in future to lead to improvements in practice.</p> <p>Student completion and retention data of the small numbers enrolled is kept up to date and analysed thoroughly via a bespoke student management system. The achievement rate for 2022 is three of nine students, with six still completing, so full achievement outcomes cannot be determined at this point.</p>

² The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

	<p>Kingston provided evidence of pre-assessment external moderation by an IELTS³ examiner who completed the external moderation of a programme not offered during the evaluation period. Therefore, there is no reliable evidence that the student assessments for the training schemes in scope were fair and valid. A summary schedule of internal and external post-assessment moderation for NZCEL Level 3 General in 2019 was provided at a consistency review meeting to show sufficiency. A recommendation from the 2016 EER noted the need to implement a comprehensive moderation schedule and this has been implemented. However, the outcomes from the scheduled moderation were not provided as evidence of fair and valid assessment for the 2023 EER.</p> <p>Students acquire useful skills and knowledge, enjoy their learning and progress well. Clear goal-setting and placement test and entry checks lead to achievement. All learners had clear goals which they explained well, and were supported by regular checks on their ability to achieve.</p>
<p>Conclusion:</p>	<p>The learners have achieved well to meet their expected goals. However, there was little supporting evidence to validate achievement via an effective moderation system and schedule.</p>

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

<p>Performance:</p>	<p>Good</p>
<p>Self-assessment:</p>	<p>Good</p>
<p>Findings and supporting evidence:</p>	<p>The students have diverse reasons to study English at Kingston. Most are there to learn and improve their English language competency to enable them to do further study or for personal and work goals.</p> <p>At enrolment, students specify their goals/intentions as they begin their study. Survey data is collected following completion to assess if initial intentions have been met. Feedback from the students from 2017 to 2019 showed that 95 per cent of them achieved their initial intentions and therefore gained value from their learning. The students are satisfied with their progress and</p>

³ International English Language Testing System

	<p>are confident in using their English language skills to progress to further study or work.</p> <p>With only three graduates of nine students in the last period up to December 2022, it is difficult to gauge the value of the outcomes. Kingston is aware of one graduate pathwaying to further study. This graduate had the necessary capability and skills and knowledge to enrol into study to become an early childhood teacher. The remaining students, who are still studying, hope to enter university or pathway to further English study or work.</p> <p>A NZQA consistency review in 2019 for the 2017 and 2018 years for the level 3 English programme noted that Kingston provided sufficient evidence of the value of the programme outcomes.</p> <p>Plans and processes to gather information on graduate outcomes are comprehensive, and analysis of matching actual outcomes and the intentions of learners on completion will enhance the organisation's understanding of the value of the training schemes. As yet Kingston does not yet have sufficient data around graduate outcomes and this makes it difficult to identify whether any improvements to the programme have had an impact on outcomes.</p>
Conclusion:	Kingston analyses student goals at enrolment and assesses whether they have met these goals on completion. This will provide good information on the value of the outcomes once Kingston is functioning with a complete cohort of students.

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:	Kingston has good knowledge of the needs and goals of the students they enrol. The various training schemes are designed and contextualised to meet student needs. They are aligned to the CEFR ⁴ , and provide for effective staircasing between levels and schemes.

⁴ Common European Framework of Reference for Languages

	<p>The training schemes are delivered by well-qualified and experienced teachers, using high-quality teaching and learning resources. Mixed-level classes have been necessary as student numbers rebuild, and these have been managed well to students' satisfaction. Staff meetings keep everyone updated on student progress.</p> <p>The training offered is course-book based, using recognised current materials. New Zealand Māori values and culture are integrated into lessons with convention and protocol aspects added into classroom learning along with a visit to the local marae.</p> <p>Kingston monitors student progress well, and students are regularly assessed. Formative progress tests from the course book are completed weekly for IELTS and the pre-intermediate level. Alternative materials are available for students who need to repeat a level, ensuring academic integrity and motivation. Kingston is using a computer-based testing software to efficiently mark large volumes of tests. This is well placed in preparation for growing intakes.</p> <p>Programme review was not completed through the 2017-19 years as the NZCEL programme had ceased and, although completed in 2022, there was reduced data available due to low student numbers.</p> <p>User guides provided to all staff ensure all aspects of the student learning experience alongside NZQA rules are consistently followed (these will be used across campuses in time). Peer observations are carried out to build capability along with external input from a well-qualified external observer.</p> <p>Kingston supports regular professional development including one teaching-free day at each course end. This allows tutors to reflect on any additional professional development that might be needed.</p> <p>Tutors and students described the appropriate approaches being taken to meet the needs of all students in small classes comprising mixed levels.</p> <p>Kingston developed a comprehensive mapping document aligning assessments to learning outcomes for the NZCEL Level 3 General programme, indicating good capability in this area. The current documentation of the new training schemes is not as comprehensive. Further development using a similar mapping</p>
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	<p>approach would strengthen the academic integrity of the new provision.</p> <p>As discussed in 1.1, inconsistent internal and external moderation results means it is not yet possible to be assured that assessment is fair, valid and consistent.</p>
Conclusion:	<p>The training schemes are providing well-balanced learning opportunities for the students, and they are gaining what they need from the training and support from well-qualified tutors. Further comprehensive documentation to support the new training schemes and consistent moderation of assessments to validate achievement is a work in progress.</p>

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>Systems and processes for international student recruitment, enrolment and pastoral care are now in place, with good attendance and low withdrawals for the new cohort. A recently created bespoke student management system keeps track of students and provides immediate ongoing checks and support to ensure students are involved in their learning.</p> <p>Students are well supported as individuals, with support provided in the form of one-to-one discussions as well as overall guidance from teaching staff and management.</p> <p>Student goals and objectives are captured and monitored, with progress checks every six weeks and a check at completion to ascertain if goals have been met.</p> <p>Monitoring and connecting with learners' academic and wellbeing needs and engagement in learning is evident through good placement of students via a comprehensive placement test. High attendance demonstrates that all staff are involved with students to ensure their ongoing motivation and wellbeing.</p> <p>Kingston uses surveys from orientation to exit to understand student needs, in addition to direct engagement. The learner voice is captured in survey feedback, with results aggregated and used to identify trends (although this process is still developing at this point, given the small number of students).</p>

	<p>The surveys show that students are happy with their progress and are satisfied with Kingston's performance and the changes made as a result of feedback.</p> <p>Students are comfortable in providing feedback both formally and informally, with evidence heard of feedback being responded to immediately.</p> <p>Graduates are supported in their enrolment to pathway institutions, and Kingston is working to maintain ongoing communication after graduation.</p> <p>Kingston carried out a systematic self-review of the Code and has effective practices in place to meet the required outcomes as set out in the Code.</p>
Conclusion:	Students are well supported. Appropriate and effective guidance and support mechanisms are in place for the few international students who are currently enrolled. Students are motivated and engaged in their learning.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Kingston has a small, experienced and well-aligned management team who work well together with good, ongoing, open communication. They respond well to advice from a well-rounded team of financial and strategic experts. The strategic plan spans only two years, showing a realistic/pragmatic approach to the future.</p> <p>Kingston has revisited its strategic focus and has replaced NZCEL with English Language Training Schemes which at present are unable to provide comprehensive evidence of the value of the graduate outcomes. The data available for 2017-22 – along with the lack of effective or functioning moderation practices – was too limited to enable a good understanding of educational performance.</p> <p>Kingston was able to provide evidence of a sustainable business model aligned to its educational purpose. The plan shows good business sense with the goal of providing high-valued outcomes for the students. Organisation and preparation are underway for</p>

	<p>more students, including those under 18, and work has begun on memorandums of understanding with schools (i.e. St Kentigern and Onehunga High Schools) to ensure graduates of the training scheme can progress and pathway to other programmes.</p> <p>The chief executive actively engages with external stakeholders and, in addition to developing training schemes, has a focus on other English language training to meet their requirements. For example, Kingston is bringing the British Council official IELTS test centre on site.</p> <p>The chief executive responds to good advice from a well-rounded team of financial and strategic experts and a functioning national external advisory committee which meets twice a year. The advisory process would benefit from an education expert to help with aligning a curriculum to the training schemes. Kingston holds formal monthly management meetings. Reporting from the chief executive to the advisory committee includes the academic, programme and staffing matters of the PTE. Meeting minutes provide information and data around delivery and performance.</p> <p>Improvements in quality processes and delivery/programme-related self-assessment are evident and are led by the chief executive. Embedding these practices once there are more students enrolled would increase confidence in Kingston's capability in self-assessment.</p>
Conclusion:	<p>Kingston has a clear vision and purpose with reliable leadership and a good understanding of plans for future growth. The PTE now has in place many effective systems and processes (with the exception of a functioning moderation system) for capturing and analysing data and information which can be used to inform and guide the performance of future student cohorts.</p>

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	Kingston has good checks and oversight of the organisation's compliance accountabilities, and has policies and procedures to guide and support the operation of the organisation.

	<p>Kingston meets its responsibilities under the Code, and has submitted the required attestation to NZQA. Kingston has also undertaken a thorough Code review and gap analysis, identifying areas to improve.</p> <p>Regulatory compliance requirements are carried out in a timely manner covering:</p> <ul style="list-style-type: none"> • Student fee protection • Public trust monies deposited • Conflict of interest forms completed in a timely fashion • International student files sampled – a review of past student files raised no concerns or inconsistencies • Longstanding agents and effective monitoring of these • Attendance compliance • Annual audit completed • Student visa conditions check via an updated student management system with pop-up reminders. <p>Moderation-related issues noted in 1.3 showed that no established moderation system or policy is in place and no moderation of assessment was available to validate achievement. Kingston needs to prioritise establishing moderation practices to validate assessment.</p>
<p>Conclusion:</p>	<p>Kingston’s key compliance responsibilities are being met, although there is a discrepancy between moderation of assessment processes and documentation that needs to be addressed.</p>

Focus areas

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

English Language 2017-19 and 2022 Training Schemes

Performance:	Good
Self-assessment:	Good

International Student Support and Wellbeing

Performance:	Excellent
Self-assessment:	Excellent

Recommendations

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

NZQA recommends that Academy Business Training NZ Limited:

- Review the quality of the data collected to ensure correct data is used to note achievement and withdrawals.
- Establish a moderation system that ensures moderation occurs with internal and external moderation results being documented and any resulting actions carried out.
- Gain an educational perspective on the national advisory committee by bringing on an education expert.
- Develop documentation to support the training schemes to ensure constructive alignment of teaching, learning and assessment.

Appendix

Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

For the same reason, these findings are always limited in scope. They are derived from selections and samples evaluated at a point in time. The supporting methodology is not designed to:

- *Identify organisational fraud⁵*
- *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.*

⁵ NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2021, which are made by NZQA under section 452(1)(t) of the Education and Training Act 2020 and approved by the NZQA Board and the Minister of Education.

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 2021, the Consent to Assess Against Standards Rules 2021 and the Training Scheme Rules 2021 respectively.

In addition, the Private Training Establishment Registration Rules 2021 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration.

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 2021. 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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