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External Evaluation and Review Report



Coastguard Boating Education Service

Date of report: 28 October 2021

About Coastguard Boating Education Service

Coastguard Boating Education Service (CBE) is a fully owned subsidiary of the Royal New Zealand Coastguard Federation. It offers boating education and specialist training to all ages who have an interest in marine activities. Together with Coastguard New Zealand and the regional coastguard organisations, CBE promotes safe boating and offers a variety of water safety-related courses.

Type of organisation:	Private training establishment (PTE)
Location:	Westhaven Marina, Auckland – but due to building renovations there, the PTE has temporarily relocated its offices to 470 Parnell Road, Parnell.
Code of Practice signatory:	N/A
Number of learners:	Domestic: CBE enrolls around 11,000 people annually, mainly in various short courses. This equates to approximately 111 EFTS (equivalent full-time students). As at March 2021, CBE had 3,310 learners enrolled.
Number of staff:	Eight full-time and three part-time permanent staff (plus approximately 100 contracted and voluntary staff)
TEO profile:	Royal New Zealand Coastguard Boating Education Ltd (NZQA website)
Last EER outcome:	At the previous external evaluation and review (EER) visit, conducted in May 2017, NZQA was Highly Confident in CBE's educational performance, and Confident in their capability in self-assessment.
Scope of this evaluation:	Marine VHF Operator Certificate (an NZQA training scheme); and Stakeholder Engagement
MoE number:	9948
NZQA reference:	C45388
Dates of EER visit:	9 and 10 June 2021

Summary of results

The core educational activity of CBE – delivery of education so that ‘Boating will be a safe and pleasurable experience for all’ – is substantial and sound. A range of experienced, professional tutors and other staff co-ordinate that learning. There are areas of performance which can be further strengthened, and a few areas of self-assessment require broader coverage or evidence of impact to be fully effective.

Confident in educational performance	<p>CBE has a number of significant national stakeholders. Their needs are clearly identified and are being met through relevant programme and short course offerings.</p> <p>Uptake of training is strong year-on-year, as is learner achievement. The PTE’s reach across age groups, locations and communities of interest throughout New Zealand on an ongoing basis is impressive.</p>
Confident in capability in self-assessment	<p>CBE is well led, has clarity of purpose and direction, and is responsive to community needs. It resolves any issues which arise in a timely and considered way.</p> <p>Notable, effective aspects of training and self-assessment include: the evolution of e-learning capability is apparent and timely; engagement with Māori and Pasifika communities is intentional and effective, and is now leading to additional staff and resource capability-building; the training is highly responsive to local needs and is adaptable to location and learner group. Mostly, self-assessment is effective and embedded.</p> <p>Some areas requiring improvement: ongoing tracking and reporting on moderation processes and tutor engagement – to provide evidence that assessment (for formal and non-formal courses) is valid and consistent across all areas of delivery – needs to be strengthened; processes for cyclical and planned programme review across the whole portfolio also need to be strengthened. Analysis of learner achievement by, for example, Tertiary Education Strategy priority groups and ‘at-risk’ community groups is limited to providing evidence that achievement is equitable, improving or declining.</p>

Key evaluation question findings¹

1.1 How well do learners achieve?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Most learners complete their course at CBE. The content of learner achievement has high value and relevance as it directly relates to Water Safety New Zealand, as well as to Maritime New Zealand's Safer Boating forum strategies for enhancing safety and reducing harm.</p> <p>The PTE presented data showing three types of pass rates:</p> <ol style="list-style-type: none"> 1. Classroom-based courses (using small group direct tuition with guidance opportunities, often towards an open-book exam). These routinely have pass rates above 90 per cent. 2. Online. This is a relatively new delivery mode which has had some teething issues with implementing online assessment and is lower than #1 at around 73 per cent since the last EER. 3. A slowly declining, much smaller number of home-study candidates², where pass rates declined from 55 per cent in 2017 to 50 per cent in 2019. It is not evident that in-depth analysis has occurred around the home-study achievement gap, apart from anecdotal reasoning. <p>Moderation of assessment occurs, and oversight of delivery and teaching is sound (see also 1.3). Māori and Pasifika pass rates are also high in face-to-face delivery modes, but data analysis on their participation or success in the other modes is limited.</p>
Conclusion:	The PTE has outstanding participation by a wide range of learners year-on-year. CBE is clearly committed to encouraging participation and achieving educational success for all groups including Māori and Pasifika. Achievement is sound, with deeper data analysis planned and warranted.

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 Representing less than 10 per cent of all enrolments, and 5 per cent in the Marine VHF Operator Certificate focus area.

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>The value of outcomes is high, and is directly reflected in the programme offer and the course content which is targeted at safer boating, prevention of drowning, and improved decision-making around waterways and the ocean. New data analysis initiatives to link activities to desired impacts are of high interest and relevance to CBE. They are of a dimension greater than would be feasible for the PTE to achieve on their own.³</p> <p>CBE meets a specific educational need in a niche area where few other providers could viably operate. The programme portfolio is diverse and relevant. It reaches across age groups and into communities of interest throughout New Zealand on an ongoing basis. Uptake of that training is strong year-on-year.</p> <p>CBE learners primarily come from voluntary and recreational target audiences, and also schools. Coastguard volunteers, and many surf-lifesaving volunteers and off-shore yachtsmen and women, to give three examples, participate in the training.</p> <p>CBE also has valued outputs for people working in industry, as some programmes lead to, or better enable, paid employment. An example is the New Zealand Certificate in Domestic Maritime Operations (Level 4), which achieved a rating of sufficient in a 2017 NZQA consistency review, and has been funded by the Tertiary Education Commission (TEC) since 2019. In 2020, 19 learners successfully gained this qualification with CBE, and also achieved their skipper restricted licence and gained roles such as jet-boat, water taxi or fishing boat skipper.</p> <p>CBE graduate surveys gather responses on the skills, knowledge and behavioural changes learners have gained. They show consistently positive feedback, indicating CBE's programmes are valued by learners and likely impact their decisions around water.</p>
Conclusion:	CBE sustains a strong pipeline of willing learners, mainly from voluntary and recreational target audiences. Self-assessment of

³ [These data research initiatives](#) are led by a key stakeholder of CBE, Water Safety New Zealand.

	relevance and value is strong.
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1.3 How well do programme design and delivery, including learning activities, match the needs of learners and other stakeholders?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>The wellbeing of learners is clearly at the core of all courses and programmes offered by CBE. Programme design and delivery is intended to engage learners and lead to self-reported safety-related behaviour change as a result. This seems to be consistent and embedded practice. Examples of good practice were present. CBE has collaborated with Sailing New Zealand and the Royal New Zealand Navy to revise the advanced sea survival programme. CBE also works with many schools to deliver boating education linked to the schools' curricula; over 40,000 learners engage with CBE's Safe Boating programme annually. Coastguard New Zealand relies on CBE for delivery of the training framework for all their search and rescue volunteers nationwide, and there is also a legislative requirement being met for operating a VHF radio (see also 1.6).</p> <p>That said, programme review is conducted somewhat organically and there is no planned cycle of review. Internal knowledge of the currency of the programme, and any changes in the sector drive programme modification, but this has a risk of being reactive. Stakeholder input into programme design was not particularly evident, although there are clearly numerous, active stakeholder contact points.</p> <p>There is good understanding and use of the e-learning management system. The evaluators heard confirming feedback from graduates about this. There have been a few problems for learners around their assessment, which has been improved. Academic quality and educational delivery protocols such as providing pre-reading, managing resits, and learner identification protocols for tests are all in place. Some examples of useful physical learning resources were sighted by the evaluators, but some tutors indicated a need for updated physical learning resources in some courses.</p> <p>Effective use of learner surveys are discussed under 1.4, but more obvious or systematic utilisation of this feedback as a tool for change and improvement of programmes is also desirable. It</p>

	is unclear how tutors' perspectives or performance are formally introduced into reviews, or how potential drift from agreed delivery is avoided or mitigated. Ongoing tracking and reporting on moderation processes and engagement to provide evidence that assessment (for formal and non-formal courses) is valid and consistent across all areas of delivery also needs strengthening. ⁴
Conclusion:	Educational performance and self-assessment are generally strong in relation to this evaluation question. There is no evidence of misalignment with learner or stakeholder needs, and nothing identified by the evaluators should be read as a risk to wellbeing. There are some limitations, but CBE showed that they had identified these and had documented plans to strengthen the resourcing and oversight of programme design and delivery.

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

Performance:	Excellent
Self-assessment:	Good
Findings and supporting evidence:	<p>For the vast majority of learners, their experience of support and guidance is an integrated part of the short course delivery – be that face to face or online. Anonymised online exit surveys are taken at the conclusion of most courses. These have reasonably large numbers of responses across the programmes. As indicated under 1.2, the surveys measure satisfaction with the relevance of content, how it was delivered, and the likelihood of transfer in terms of behavioural change when they are using the skills learnt. This is thoroughly analysed and shared with PTE staff and the governance board, with actions arising as required. This is considered by the PTE as the key user data to understand learner satisfaction. According to over 90 per cent of the survey responses received from more than 800 learners over 2019-20, CBE tutors are 'well prepared'; 'effective communicators'; and are 'approachable'.</p> <p>There are a variety of modes of course delivery, enabling access by a wide range of learners. These include CBE's own premises, schools and public pools, churches, clubrooms and marae.</p>

⁴ The NZQA monitoring team has expressed some concerns about CBE's assessment practice for the New Zealand Certificate in Domestic Maritime Operations (Restricted Limits) (Level 4). NZQA expects CBE to address the issues identified in the monitoring report before the next delivery of the programme.

	<p>There has been some initial translation and incorporation of te reo Māori and Tongan into learner resources, and culturally skilled specialist tutors are contracted, including a bilingual Chinese tutor. These are constructive responses to diverse and changing learner needs.</p> <p>In the Marine VHF Operator Certificate focus area, the development of online offerings has enabled better monitoring of learner engagement, and this is helping to improve completions. Auto-generated communication informs learners about their progress and timeframes. As one response to a recommendation from the previous EER, learner competency/needs analysis is available pre-course to help learners determine their own readiness for the requirements of the programme. Ongoing support by central administration at the PTE is timely and effective, according to graduates; clear pre-course information is provided and the website is functional, accurate and easy to navigate.</p>
Conclusion:	Due attention is given to learner support, with some limitations around achievement analysis (as indicated under 1.1) and, related to this, gaining evidence or understanding the effectiveness of adaptations to guidance and support.

1.5 How well does governance and management support learner achievement?

Performance:	Excellent
Self-assessment:	Good
Findings and supporting evidence:	<p>The programme portfolio is diverse and underpinned by ongoing stakeholder consultation. Uptake of training is strong year by year as outreach strategies and word-of-mouth marketing are effective in reaching voluntary and recreational target audiences. Stakeholders contacted by NZQA confirmed continued strong endorsement of the PTE and described the interconnected consultation network within which CBE intentionally operates. As also indicated by positive ratings for achievement, value of outcomes and support for learners, there is robust evidence that CBE governance and management are clearly focused on the context, relevant content and breadth of learner achievement.</p> <p>There has been a refreshed governance board membership and a new general manager, as well as additional educational/administrative-related roles recruited since the last</p>

	<p>EER. A variety of experienced tutors are employed to facilitate courses and programmes; the continued evolution of e-learning capability is evident and timely. Staff say they have a supportive employer; opportunities to engage in relevant continued professional development is one example of this.</p> <p>Educational delivery was well supported during the lockdowns, and staff were appropriately resourced. Engagement with Māori and Pasifika communities is intentional and effective, and is also leading to some internal learning and capability-building across the PTE. The PTE operates sustainably, and as a not-for-profit seeks and carefully utilises corporate, trust and public donations to achieve its goals. The growth of TEC funding of the New Zealand Certificate in Domestic Maritime Operations (the only full-time programme) also reflects confidence in the PTE.</p>
Conclusion:	CBE is well led, has clarity of purpose and direction, and is responsive to community needs. Documentation and data analysis are good. Some limitations in the depth or evidential nature of self-assessment, as described in some other key evaluation questions, is also relevant here.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>There are numerous processes and outcomes which indicate that compliance management is attended to and is sound overall.</p> <p>Process documentation is both accurate and readily available, and sampling shows some improvement in this under the new general manager. Evidence confirming this was sighted within regular reports to the board (which meets six-weekly) and also in board minutes, and more operationally within the regular, all-staff education meeting minutes. There is also a calendar/planner for monitoring and recording compliance milestones.</p> <p>Required documentation such as attestations and fee returns are provided to NZQA in good time and are accurate.</p> <p>The PTE has engaged with Competenz appropriately including pre- and post-moderation as required. The focus area training</p>

	<p>scheme delivery aligns with NZQA approval for both face-to-face and online modes.</p> <p>A TEC audit in 2020 determined that ‘systems, processes and practices are effective and meet legislative and investment plan requirements’ relating to funded delivery.</p> <p>The focus area course syllabus is consistently aligned with that specified by Radio Spectrum Management⁵ as being required for this certificate.</p> <p>NZQA results reporting is generally timely and compliant with one exception: as a primarily short course provider, CBE has customarily given learners an ‘opt-out’ option regarding having unit standard credits reported to NZQA. However, this conflicts with NZQA's rule on maintaining consent to assess.⁶ This report includes a requirement to address this oversight.</p>
<p>Conclusion:</p>	<p>Key compliance accountabilities are reasonably well managed.</p>

⁵ Radio Spectrum Management is the government agency responsible for managing the radio spectrum in New Zealand.

⁶ This anomaly had not been identified and brought to the PTE’s attention at any of the previous external evaluations.

Focus areas

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

2.1 Focus area: Marine VHF Operator Certificate – NZQA training scheme

Performance:	Good
Self-assessment:	Good

2.2 Focus area: Stakeholder Engagement

Performance:	Excellent
Self-assessment:	Excellent

Recommendations

Recommendations are not mandatory 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 CBE:

1. Engage in deeper analysis of learner achievement by, for example, Tertiary Education Strategy priority groups and 'at-risk' community groups (as identified by Water Safety New Zealand's strategies), to provide evidence that achievement is equitable and/or improving.
2. Continue with establishing clearer programme portfolio oversight, and review accountabilities and roles. As part of that process, attend also to the findings of this evaluation around areas where self-assessment is weaker, or perhaps less well evidenced. Attend to the findings of the NZQA monitoring report as described therein.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. These include NZQA Rules and relevant regulations promulgated by other agencies.

NZQA requires CBE to review its policy on reporting results to NZQA to ensure clear alignment with NZQA's Rule 13.1(b) on maintaining consent to assess:

'1. To maintain consent to assess in respect of the entire consent or particular classifications or standards, holders of the consent (except relevant schools and transitional ITOs) must:

... b. accurately report credits for students within 3 months of assessment, unless NZQA has approved a different reporting timeframe for the holder of the consent.'

<https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/standards-and-assessment-rules/consent-to-assess/>

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 fraud⁷*
- *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.*

⁷ 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 2016, which are made by NZQA under section 452(1)(t) of the Education Act 1989 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 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively.

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.

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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz