



NEW ZEALAND **QUALIFICATIONS** AUTHORITY
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Report of External Evaluation and Review

Institute of Commercial Education (NZ)
Limited

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 16 May 2017

Contents

Purpose of this Report.....	3
Introduction	3
1. TEO in context.....	3
2. Scope of external evaluation and review	4
3. Conduct of external evaluation and review.....	5
Summary of Results	6
Findings	7
Recommendations	13
Appendix	14

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Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.

Introduction

1. TEO in context

Name of TEO:	Institute of Commercial Education (NZ) Limited (ICENZ)
Type:	Private training establishment (PTE)
First registered:	2002
Location:	13 Aberfeldy Avenue, Highland Park, Auckland
Programmes currently delivered and number of current enrolments:	General English and IELTS (International English Language Testing System), approved by NZQA in 2002. There are 37 full-time students, seven on the IELTS programme and the remainder in General English. This is equivalent to approximately 20 EFTS (equivalent full-time students) as numerous students only study for a portion of an academic year.
Student characteristics:	Current students are all of Chinese ethnicity, and are enrolled under a Student Visa arrangement, with two as full-fee paying, locally resident students.
Number of staff:	Four full-time equivalents, three part-time
Scope of active accreditation:	ICENZ has extensive consent to assess, mainly in the Business and Humanities domains. Currently, it has approval to offer General English and IELTS Preparation courses.
Distinctive characteristics and recent significant changes:	ICENZ is a suburban-based international school, which had a Category 3 EER outcome in 2015, followed by a Category 4 outcome in 2016, which led to this EER. The PTE has discontinued offering the business programme which showed poor performance at the previous EER. The programme was 'taught out' and the

final student completed their programme in January 2017. Programme accreditation and approval has been removed by NZQA.

Currently the PTE is best described as an English language (or ESOL – English for Speakers of Other Languages) school.

An assistant to the principal role and an acting academic manager have been appointed since the previous external evaluation and review (EER). Both roles are part-time. Some teaching staff have also been appointed within that timeframe.

ICENZ receives no direct funding from the government.

Previous quality assurance history:

At the previous EER in October 2016, NZQA was Not Confident in the PTE’s educational performance and Not Confident in its capability in self-assessment.

2. Scope of external evaluation and review

Focus areas and rationale for selection

ESOL course – Beginners English and IELTS preparation programme	English language provision is the PTE’s only area of programme delivery. There are two streams or cohorts within that programming – beginners and pre-intermediate English and IELTS preparation.
International students: support and wellbeing	NZQA is committed to the responsible development and delivery of education to international students. It is essential to New Zealand’s ‘brand’ to ensure that all students are adequately supported in their programmes of study. To that end, beginning from 1 August 2016, NZQA introduced a standard focus area for all EERs of TEOs that enrol international students. This focus area will examine how effectively the TEO under review is discharging its pastoral care responsibilities towards its international students.

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.

A pre-scoping meeting was held before the on-site visit. Two evaluators conducted the on-site enquiry over two days. The evaluators met with or interviewed by phone:

- The principal, assistant to principal and the new academic manager
- Current students. These interviews were supplemented by information from graduate surveys, and student survey data gathered by the PTE.

The evaluators considered various documentation as part of the evaluation:

- A self-assessment summary and data on programmes and volume of training and success rates across courses since the previous EER.
- Components of the quality management system and related policy and procedure documents, surveys, meeting minutes, course outlines (including NZQA approval records), curriculum material, website and written guidance material.

A significant proportion of the documentation viewed was selected at random based on reference by staff to key tools and processes during the interviews. Students' marked work was also sighted.

Summary of Results

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

NZQA is **Not Yet Confident** in the educational performance and **Not Yet Confident** in the capability in self-assessment of **Institute of Commercial Education (NZ) Limited**.

The English language students studying at ICENZ are given appropriate lessons within a culturally supportive environment, and report a high level of satisfaction with their overall experience. The teachers at the school are suitably qualified, and use current, relevant teaching resources. Facilities at the school are suitable for use and the support staff are welcoming and have appropriate experience and language skills to carry out their roles effectively. The school is geographically well situated to serve the formal English language learning needs of the students, most of who are drawn from the Chinese migrant community in East Auckland. ICENZ has useful relationships within this community and a good understanding of the learners' needs and goals.

Although teachers have an increasingly clearer picture of how well each student is progressing, currently there are serious limitations in the school's capability and systems to credibly measure and report learner achievement and valued outcomes overall. In relation to that limitation, new tools and processes have been introduced this year. These are not yet well interconnected or well embedded. More broadly, the entire English programme is currently being reviewed – the first time this has occurred since it was approved by NZQA in 2002. This is timely, but a more critical, sector-informed and contemporary understanding of ESOL is needed. At this point, there is weak or insufficient evidence to gauge the effectiveness of the ICENZ English language programmes.

The school's director has made numerous new, suitable and qualified appointments over the past six months, including an assistant to principal. A review of the quality management system has occurred, and refreshed policies and procedures have been implemented. This evaluation found that there is a concerted and well-documented improvement effort now occurring at ICENZ.

Leadership at the PTE has responded constructively to the challenges presented in their previous EER report. The critical weaknesses in the educational performance and self-assessment are now being addressed, and there have been some improvements, but there is still some way to go before NZQA can express confidence in ICENZ.

Findings¹

1.1 How well do students 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 **Adequate**.

Students at ICENZ can describe progress in their English language competence in real-life situations (such as shopping or casual social interactions). The recently introduced exit/graduate surveys also show that students express satisfaction with their achievement which matches their aspirations.

There are entry and progress tests for each student, marking occurs promptly, results are discussed with students, and all component parts of this process are documented. The newly introduced individual learning plans help document small-step achievements on students' pathways to overall language improvement. The plans will also benefit students in the assessment of their achievement. However, overall, the school has yet to develop a clear picture of the students' progress in relation to initial needs analysis and the benefits of different classes and teaching approaches. Knowledge of students' progress in developing their English language skills is most tangible at the teacher-student level of interaction. In some cases, progress test results were not consistent with the abilities of beginner-level students, indicating that the testing was to some extent a shared or collaborative assessment which undermines its reliability as a measure of progress. ICENZ explained that a developmental approach was being used, especially for the older cohort of students (50 plus) who have generally had no formal education in English.

Students are to some extent improving their English language capabilities. But the lack of reliable data on their progress limits the measure of achievement. (To some extent this reflects the constraints of being unable to enrol any new students since the previous EER report was published.) Lack of reliable data makes it all but impossible to identify the quality of performance of the two programme focus areas. That said, minimum expectations are being met of a structured programme of English instruction taught by qualified teachers within which students report benefits and progress.

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

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

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**.

ICENZ management provided good examples of English language graduates achieving their IELTS score goals, facilitating entry into polytechnic or university programmes. Not unreasonably, these success stories dated from the period prior to the EER held less than 6 months earlier. There have been some students who have left the programme since then. Their destinations include travel within New Zealand or overseas or a return to their country of origin.

Among the older cohort of students are those with aspirations to communicate in English at very basic levels, in settings such as health centres, supermarkets and schools. Evidence from the graduate surveys and opinions expressed to the evaluators (assisted by student translators in one meeting) indicate some improved outcomes.

More broadly, the school is geographically well situated to serve the formal English language learning needs of the students – most are drawn from the Chinese migrant community in East Auckland. ICENZ has useful relationships among this community and a good understanding of their learners' needs and goals.²

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

The four teachers currently employed (part-time) at ICENZ are suitably qualified, and use current, relevant teaching resources. Teachers and students relate effectively to each other, class sizes are small, and students have the opportunity to interact with teachers from very different English teaching backgrounds, including two who speak Chinese. The acting academic manager has implemented a new monthly review meeting. However, to some extent the quality of the programming is still too reliant on the good work of teachers and not strongly enough on a well understood or well-connected system as would be typical in a soundly performing ESOL school.

² Some of the older cohort of students have children in New Zealand who are on a pathway towards permanent residence, and so are studying during the period before 'family reunification' can occur and they too can settle permanently.

Positive features which also suggest some improvements in the design and delivery of the programme include: moderation of placement tests; documented teacher observations by management; and weekly lesson reviews and better record-keeping of each students' work. Students also provide written feedback and rate the quality of teaching. A draft or 'in progress' review of the English programme curriculum was provided to the evaluators. This is reportedly the first in-depth review since it was approved by NZQA in 2002. Additional external and expert opinions should be sought to strengthen the ESOL programme redesign.

Work to strengthen the programme design and delivery to better match the needs of students and other relevant stakeholders is occurring. This is being suitably documented and reflected upon but there is considerable work to do before higher ratings are warranted under this evaluation question. There is good assessment based on the textbooks in use, which have New Zealand content and contextual material inserted (e.g. banking, medical). What was less clear – given the teaching to multi-level classes which is occurring – was the process of assessing students against a pre-established level or against individual learner progress.

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

The rating for performance in relation to this question is **Adequate**.

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

As mentioned, suitably trained bilingual teachers are accessible to the students and are able to teach reactively to student needs. Similarly, the addition of an IELTS examiner to the teaching roster is an excellent addition to the team – which could be further utilised as an outcome of the programme review. There are new, positive contributors to the support available to students.

Each student now develops a learning plan document at the commencement of their studies which sets out their goals and aspiration as well as recording placement and progress test scores.³ This is a recent, necessary and useful addition to engaging and supporting students in their learning. At the point of this evaluation it is difficult to say how effective or well understood the learning plan is as a tool, particularly in terms of improvements to learning.

Students reported some limitations in the quality of the computing equipment they use as part of their self-directed learning. Other than that, they reported satisfaction with the care and attention provided by ICENZ. As noted, management has invested in brightening up some of the classrooms. Student amenities (such as bathrooms and kitchen facilities and a study room) are suitable.

³ This was a retrospective element for the current cohort who had been enrolled before the learning plan was introduced.

There have been no formal complaints, critical incidents or related issues since the previous EER. The student body has two representatives who are able to report issues to management. Evaluations of teaching have also occurred. Monitoring of performance overall has been strengthened by both the assistant principal and acting academic manager. The expected Code of Practice outcomes are being met in relation to the type and volume of students being taught, and their stated needs.

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

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

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

The school's principal has made numerous new and suitable appointments over the period since the previous EER, including an assistant to principal role. He has recently become a board of trustees member at a local primary school, which is adding to his knowledge of compliance within educational settings. These are largely performance management related, and with a view to responding to the findings of the previous EER and NZQA risk findings. There have been several 'quick wins' as a result. These include the review of the quality management system, with refreshed policies (such as better attendance monitoring) and procedures (more regular student progress meetings, and an annual academic and operational calendar for example) now being used. This evaluation found that there is a concerted and well-documented improvement effort now occurring at ICENZ.

The PTE leadership has responded constructively to the challenges presented in the previous EER report. The governance group/advisory board are well informed about the improvement process and have reportedly become more involved with more frequent meetings. Following the termination of the poorly performing business programme, the critical weaknesses in educational performance and self-assessment are now being addressed. There have been some improvements, but there is still some way to go before NZQA can express confidence in ICENZ's educational performance and self-assessment overall. However, the focus on improving the quality of academic quality assurance, teaching and (valid) assessment are positive as reflected in ratings under this key evaluation question.

1.6 How effectively are important compliance accountabilities managed?

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**.

Information held by NZQA on the approved programme structure is limited. However, the duration of the programme, teaching weeks, and the weekly lesson schedule correlated with what was known. That said, students' length of attendance at ICENZ varies – some have been enrolled for a year, while others study for short periods of a few weeks. Timetables, an accurate student register, and attendance records are all in place, understood by staff and in use. Student files sampled on site contained the appropriate and required information.

Management undertook a 'surprise' check of student identities in November 2016 which found that there were a few students in class who were not entitled to be present, and were subsequently removed. Possible historical patterns of misrepresentation have been directly confronted and dealt with. This is one example of improvements in management accountability and more direct oversight of administrative processes which are aligned to both NZQA and Immigration New Zealand requirements.

ICENZ conducted a comprehensive review of its compliance with the Code of Practice. This is documented. Responsibilities are appropriately allocated across staff. A review of the student handbook occurred in September/October 2016 and included staff training and familiarisation. Information on the Code of Practice is provided to students in this handbook. No new international students have been enrolled since the previous EER, so there is no engagement with agents outside of New Zealand. No student under 18 is enrolled. Two visits were undertaken by Immigration New Zealand in November 2016 and 'no major issues' were identified, and this was confirmed directly with Immigration New Zealand by the evaluators.

The evaluators pointed out that some of the signage at the PTE and programme information on the website was inaccurate (since they stopped offering business and computing programmes). ICENZ agreed to rectify this promptly.

Focus Areas

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

2.1 Focus area: ESOL (English for Speakers of Other Languages) course – Beginners English

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

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

2.2 Focus area: IELTS (International English Language Testing System) course

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

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

2.3 Focus area: International students: support and wellbeing

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

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

Recommendations

NZQA recommends that ICENZ continue progressing their own documented improvement strategies, programme review process, and evidence gathering in relation to the improvements they are seeking to maintain and build on. Additional external and expert opinions should be sought to strengthen the ESOL programme redesign. In addition, the insights and reflections generated by this evaluation, and reported in this document, should also be used proactively to strengthen the quality of teaching at the school.

Requirement

NZQA notes that ICE(NZ) only holds approval for the deemed training scheme 'General English and IELTS Preparation'. This deemed training scheme is approved for 12-week delivery. NZQA requires that all offers of place reflects this.

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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz