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External Evaluation and Review Report

Institute of Commercial Education
(NZ) Limited

Date of report: 21 February 2019

About Institute of Commercial Education (NZ) Limited

Institute of Commercial Education (NZ) Limited (ICENZ) is an English language school delivering general English tuition at Beginner to Pre-intermediate levels, and preparation for International English Language Testing System examinations (IELTS).

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| Type of organisation: | Private training establishment (PTE) |
| Location: | 13 Aberfeldy Avenue, Highland Park, Auckland |
| Code of Practice signatory: | Yes |
| Number of students: | Domestic: nil International: In 2017, 44 students (22 equivalent full-time students) |
| Number of staff: | Three full-time and five part-time staff |
| TEO profile: | See: NZQA – Institute of Commercial Education (NZ) Ltd English language tuition is delivered in 12-week blocks at three levels – Beginner English (one daytime class and one evening class), Pre-intermediate English and IELTS preparation. |
| Last EER outcome: | In 2017, NZQA was Not Yet Confident in the PTE’s educational performance and Not Yet Confident in capability in self-assessment |
| Scope of evaluation: | <ul style="list-style-type: none">• International Students: Support and Wellbeing• General English and IELTS preparation (Training Scheme) |
| MoE number: | 7493 |
| NZQA reference: | C32309 |
| Dates of EER visit: | 13 and 14 November 2018 |

Summary of Results

ICENZ leadership has not adequately addressed the key challenges identified in the previous EER report. Evidence of further improvement is required before NZQA can express confidence in ICENZ.

Not Confident in educational performance

- ICENZ's academic leadership and programme oversight is inadequate.
- The planned review of the English programme has not been completed (refer 1.3).
- Systems for measuring and reporting learner achievement require improvement (refer 1.1). Speaking, listening and writing skills are not formally assessed. There is limited value in moderation activities.

Not Confident in capability in self-assessment

- The placement process is not properly assessing learner needs or reliably identifying the class level most suited to learners.
- The quality of teaching plans and the usefulness of individual learning plans for supporting student learning are variable (refer 1.4).
- Some students are achieving their goals, to improve their communication skills for daily life or progress to further study (refer 1.2).
- Management has sought to extend engagement with the local community and improve policies and procedures.
- ICENZ is not effectively managing its compliance accountabilities (refer 1.6). Breaches have been noted in relation to the Code of Practice¹ and NZQA Rules.

¹ Education (Pastoral Care of International Students) Code of Practice 2016

Key evaluation question findings²

| 1.1 How well do students achieve? | |
|-----------------------------------|---|
| Performance: | Poor |
| Self-assessment: | Poor |
| Findings and supporting evidence: | <p>Tutors monitor individual student progress through class activities, individual learning plans (ILPs) and regular tests of topic-based units of learning. These tests typically focus on reading skills, vocabulary and grammar.</p> <p>ICENZ reports that the older cohort of Beginner-level students (50 years plus) make progress which is consistent with their goals for improved communication skills for daily life. However, evidence from interviews and a sampling of student learning records suggest that some students make very limited progress despite extended periods of enrolment.</p> <p>ICENZ has no knowledge of IELTS scores achieved by its graduates. ICENZ said IELTS practice tests were conducted regularly but no records were available of these or other evidence of the progress made by this cohort.³</p> <p>ICENZ has revised the placement test and introduced regular whole-of-school tests. However, important weaknesses remain in ICENZ systems for measuring learner progress. Writing tests are either not administered or not marked. ICENZ does not formally assess speaking and listening skills.</p> <p>ICENZ has analysed whole-of-school test results for January, May and October 2018 for Beginner and Pre-intermediate cohorts. Explanations were sought from staff and management about the validity of the data and utility of the analysis. No clarification was provided.</p> |
| Conclusion: | Tutors have some knowledge of individual student progress. Systems for reporting overall achievement are inadequate. Credible achievement data and analysis was not provided. |

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

³ Twenty-one IELTS students in 2017

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

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Findings and supporting evidence: | <p>ICENZ has analysed graduate survey responses for 2016-2018 (year-to-date). Many students report satisfaction with their study experience and the usefulness of improved English skills for daily life in New Zealand. An average satisfaction rating of 89 per cent was achieved in 2017 (83 per cent response rate).</p> <p>Evidence of valued outcomes is less convincing for some Beginner-level students with very low levels of English who make very limited progress over an extended enrolment period (refer 1.1).</p> <p>A sampling of completed surveys shows that some students have signalled their intention to undertake further study. ICENZ does not follow up to confirm graduate destinations or their success in IELTS exams and/or further study.</p> <p>The owner/principal is active in local community affairs and some efforts have been made to improve the value of the programme for students. Advice is sought from the advisory committee which meets quarterly. Recently, a new appointee to the committee agreed to deliver monthly sessions on New Zealand culture. The head of ESOL (English for Speakers of Other Languages) from a local high school was invited to discuss teaching resources. The outcomes of this meeting are not clear.</p> <p>Education agents have been surveyed; however, it is not evident how the survey findings have been used for improvement.</p> |
| Conclusion: | <p>Evidence of valued outcomes is not complete for all cohorts. Very recently, some steps have been taken to improve the value of the programme for improving students' understanding of and exposure to New Zealand culture.</p> |

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

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Findings and supporting evidence: | <p>ICENZ has not completed the review of the English programme identified as underway at the previous EER. Staff were unable to comment on the status of the curriculum document or its relationship to their day-to-day teaching. There is a misalignment of English language levels with the CEFR⁴ as outlined in the curriculum document. This suggests teaching may not be at the correct standard for the English language levels.⁵</p> <p>The programme is based on a standard English-language text with some local content. Lesson plans vary in quality; the detail is inadequate for the shared teaching model in the Beginner classes. Learning activities mainly focus on textbook objectives rather than tailored to the individual students' ILP (refer 1.4).</p> <p>ICENZ provides some out-of-class activities and guest speakers to provide greater exposure to New Zealand life and culture. Staff noted that more authentic, New Zealand-based resources (including online) are required.</p> <p>ICENZ reports a greater focus on assessment and moderation in 2018. Systems for measuring learner progress remain unacceptably weak (refer 1.1). Moderation has limited value. Unit tests, derived from published texts, and whole-of-school tests do not include speaking or writing which are the areas most requiring moderation.</p> |
| Conclusion: | Programme design and delivery requires strengthening to ensure learner needs are met and academic standards are maintained. |

⁴ Common European Framework of Reference for Languages: Learning, Teaching and Assessment.

⁵ For example, Elementary goals are aligned to A2+ to B1. According to the CEFR, this alignment equates to the lower end of an independent user. The correct Elementary alignment to the CEFR would be that of a basic user A1 to A2. Refer <https://www.coe.int/en/web/common-european-framework-reference-languages/table-1-cefr-3.3-common-reference-levels-global-scale>

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

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Findings and supporting evidence: | <p>The placement test was changed in early 2018 to improve its accuracy. However, it remains unreliable for assessing learner needs and placing them at the most suitable level. This was confirmed in interviews with staff and students.</p> <p>Teaching of multi-level classes (between 10 and 15 students⁶) does not always meet the needs and expectations of learners.</p> <p>Students generally report satisfaction with their teachers, particularly in the Pre-intermediate class, where strong relationships and small numbers support a positive classroom environment and student progress. Two students planning to take the IELTS exams are not gaining the necessary exam skills, despite enjoying and engaging in the Pre-Intermediate class.</p> <p>High staff turnover and larger classes reduce opportunities for Beginner-level learners to establish relationships, receive individual attention and gain confidence. ILPs for this group are either not completed or not effectively used for supporting student learning. There is no evidence of individual student-tutor meetings to add value to this process. Students do not sit an exit test and written progress reports are only provided to students on request.</p> <p>Student feedback is invited through surveys; student representatives meet regularly with management.</p> <p>Systems and processes generally meet the expected Code of Practice outcomes for student wellbeing, although improvements are required in relation to students aged under 18 years (refer 1.6). Support staff are available to provide information, support and advice to students, although it is not clear how evening class students access their services.</p> |
| Conclusion: | The effectiveness of ICENZ's support for students is variable. |

⁶ ICENZ has a maximum class size of 20 students.

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

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Findings and supporting evidence: | <p>The owner is closely involved in the day-to-day operations of the PTE, with support from external advisors. However, academic leadership and programme oversight is inadequate, and key challenges identified in the previous EER report have not been adequately addressed. Important weaknesses remain in programme design and review, academic processes, and gathering and using information to understand learner achievement (refer 1.1, 1.3).</p> <p>High staff turnover reduces the organisation's effectiveness and support for educational achievement (refer 1.4). It is not evident that recent casual part-time appointments (to academic team leader and coordinator roles) are sufficient to improve future performance.</p> <p>Tutor performance is monitored through classroom observations and student feedback. There was conflicting information about whether planned professional development for teaching staff in 2018 has taken place. It is not clear how annual reflections by these staff are used for improvement.</p> <p>ICENZ gathers and analyses feedback from students and stakeholders. Guest speakers and out-of-class visits are examples of improvements brought about by these self-assessment activities.</p> <p>Interviewees noted that further improvements to teaching resources and computing equipment, and better maintenance of the student amenities are required.</p> |
| Conclusion: | Management has sought to extend engagement with the local community and improve policies and procedures. However, required improvements in key aspects of the programme that underpin educational performance have not been achieved. |

1.6 How effectively are important compliance accountabilities managed?

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| Performance: | Poor |
| Self-assessment: | Poor |
| Findings and supporting evidence: | <p>NZQA approved ICENZ for the General English plus IELTS training scheme in 2002 as a 25-hour per week programme to be delivered over 12 weeks. ICENZ's published delivery timetable is 20 hours per week (or 15 hours per week for domestic students⁷). Following the EER, ICENZ advised that the programme includes 20 hours classroom tuition plus five hours self-study per week (with teachers available on site for consultation if required). This explanation is not consistent with the documents referred to above or with discussions during the EER.</p> <p>In October 2018, ICENZ determined that it complied with the Code of Practice, and identified areas for improvement. Several examples of non-compliance were noted during the EER, including processes for reference checking of education agents, and regular monitoring of the progress and wellbeing of under-18-year-old students.⁸</p> <p>During a monitoring visit in October 2018, and in reviewing additional information, NZQA identified breaches of the Student Fee Protection Rules 2013⁹ and the Code of Practice.¹⁰ A sampling of attendance records also showed that ICENZ is not managing leave requests for students in accordance with its January 2018 Leave and Holiday Policy or the February 2018 Attendance Policy.</p> |

⁷ Refer ICENZ Curriculum Pack, version 3, revised 8 November 2018.

⁸ ICENZ does not maintain records of regular communications with the parents of international students under the age of 18 (NZQA notified ICENZ that this was required following a compliance visit to ICENZ in 2016).

⁹ This included failure to deposit some student fees into ICENZ's trust account within the period specified under the Student Fee Protection Rules 2013 and failing to notify Public Trust of changes to some students' start dates which results in funds being drawn down from the trust account earlier than ICENZ was allowed to.

¹⁰ ICENZ failed to ensure (in at least seven out of 16 records sampled) that the student's insurance policy covered the entire period of study with ICENZ.

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| | ICENZ reports that it has reviewed its quality management system and ensured policies and procedures comply with the Health and Safety at Work Act. |
| Conclusion: | ICENZ is not meeting minimum expectations or requirements in managing its compliance accountabilities. |

Focus Areas

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

2.1 Focus area: International Students: Support and Wellbeing

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Conclusion: | Minimum standards of care and support for international students are met. Bilingual staff are available to provide information and advice. |

2.2 Focus area: General English and IELTS preparation

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| Performance: | Marginal |
| Self-assessment: | Marginal |
| Conclusion: | ICENZ reports that it has a good understanding of the learners' needs and goals. However, some important needs of learners (especially Beginner students) are not being met. |

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 Institute of Commercial Education (NZ) Limited:

- Strengthen academic oversight for the ESOL programme to address ongoing important weaknesses in programme design, review and delivery.
- Establish effective systems for gathering and using information to measure and report learner achievement.

Requirements

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

NZQA requires Institute of Commercial Education (NZ) Limited to establish processes and systems to ensure compliance with:

- Student Fee Protection Rules 2013
- NZQA Rules – specifically, [Training Scheme Rules 2012](#), 4.1 Criterion 6; [NZQF Programme Approval and Accreditation Rules 2018](#), 12d; [Assessment \(including Examination\) Rules for Tertiary Education Organisations 2018](#), 5.1a
- Education (Pastoral Care of International Students) Code of Practice 2016.

Appendix

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.*

Disclaimer

The findings in this report have been reached by means of a standard evaluative process: <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>. 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 fraud¹¹*
- *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.*

¹¹ 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 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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