# External Evaluation and Review Report

Imperial College of New Zealand Limited

Date of report: 28 February 2023

# About Imperial College of New Zealand Limited

*Imperial College of New Zealand Limited (ICNZ) provides English language teaching to students in New Zealand and China. Learners may study general English through to New Zealand certificates which serve as foundation programmes for further tertiary study.*

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| Type of organisation: | Private training establishment (PTE) |
| Location: | Level 3, ICNZ House, 16 Waverly Street, Auckland |
| Code of Practice signatory: | Yes |
| Number of students: | International: 115 EFTS (equivalent full-time students) |
| Number of staff: | Seven full-time equivalents; two are part-time |
| TEO profile: | [ICNZ College of New Zealand](#) |
| Last EER outcome: | At the previous EER, conducted on 26 April and 8 August 2018, NZQA was Confident in ICNZ's educational performance and Confident in the PTE's capability in self-assessment. |
| Scope of evaluation: | • Training Schemes (English for Beginners [ID:127152] and English for Advanced [ID:127153]) <br><br> • New Zealand Certificate in English Language (Academic) (Level 4) (NZCEL) [ID:126293] (Ref: 1883) <br><br> • New Zealand Certificate in Study and Career Preparation (Level 4) (Commerce) (NZSCP) [ID:126757] (Ref: 2860) <br><br> • International students: support and wellbeing |
| MoE number: | 7499 |
| NZQA reference: | C50729 |
| Dates of EER visit: | 19 October and 18 November 2022 by Zoom |

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# Summary of results

*ICNZ is building capability in self-assessment. There are sound processes for capturing and recording educational performance, and there is good evidence that these processes are generally contributing to understanding and responding to students' needs. To strengthen self-assessment further, ICNZ needs to conduct and report on more in-depth, comparative analysis of their students' achievements.*

**Confident in educational performance**

**Confident in capability in self-assessment**

- Performance outcomes for students attending ICNZ are highly positive. Students who graduate have developed the confidence and ability to apply English in community and academic settings.

- Students are well supported, both academically and pastorally. The individual learning journey of each student is assisted and managed by committed staff.

- Programme delivery and design meets the needs of students and stakeholders. Programme review provides sufficient information of individual student performance but lacks the rigour of in-depth data analysis and supporting self-assessment.

- There has been some variability in moderation results for one of the programmes. This has affected the performance rating of one of the key evaluation questions (1.1). There is now sound and conclusive evidence that the current quality assurance processes of internal and external moderation are robust, and that staff are continuing to improve their capability around managing the assessment process.

- Managing some compliance accountabilities in a timely manner needs improvement. ICNZ needs its system of self-assessment to be robust enough in this area to prevent further breaches.

- ICNZ management has reacted positively to external input from regulatory agencies, and there is evidence that self-assessment has improved since the last EER.

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# Key evaluation question findings[1]

## 1.1  How well do students achieve?

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| Performance: | **Good** |
| Self-assessment: | **Good** |
| Findings and supporting evidence: | ICNZ maintains high completions across programmes, and few students withdraw. Attendance (often a positive indicator that contributes to performance) is also strong across programmes and modes of delivery. Students in the training scheme progress at the expected rate, and the evidence of their learning gains is held in course book progress tests, a repeated proficiency test and one-to-one interviews.<br><br>Student progression decisions are discussed in staff meetings. Self-assessment of the training schemes could be strengthened by providing evidence of the analysis of cohort and individual performance and using this analysis to support delivery. This could be done by comparing age demographics and how well their needs are met, comparing results for different teachers, nationalities, etc.<br><br>The two certificate programmes evaluated also have high qualification completion rates, and most students progress to higher-level studies. Achievement rates for both programmes are meeting the ICNZ educational performance indicator target of 90 per cent, and compare very favourably when benchmarked against Tertiary Education Commission national standards and NZCEL Academic Level 4 completions.<br><br>The weak moderation results for the NZCEL Academic Level 4 programme in 2021 has affected the rating of performance in this key evaluation question. Looking ahead to the future, there is sound evidence that  internal moderation process is now robust, and that assessments are fit for purpose.<br><br>Overall, self-assessment of student performance is well managed at the individual level. Some more in-depth, |

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

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| | comparative analysis of individual performance against cohorts would reveal contributing factors of delivery which may lead to improvements. This would strengthen self-assessment. |
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| Conclusion: | There are strong rates of achievement, and individual student performance is tracked and well supported by staff. The quality of self-assessment is improving but lacks the maturity and detail of evidence to be exemplary in this rating. |

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

| Performance: | **Excellent** |
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| Self-assessment: | **Good** |
| Findings and supporting evidence: | There are significant and highly valued outcomes for students. Training scheme students gain an increase in confidence in their skills to engage with everyday life in New Zealand. One example given was understanding and successfully completing payment of bills. Student evaluations are highly positive about their experience at ICNZ, and they recommend the study programmes to others. Requests for learning outside the classroom have been met, and this broadens the opportunities for students to engage with life in Auckland. There is some evidence that education agents value the delivery and support given at ICNZ. |
| | The destinations of students who complete the training schemes are captured at exit, and there is good evidence that some students are progressing to higher-level programmes and gaining employment. Some aggregation and analysis of outcomes would strengthen self-assessment. |
| | Outcomes for students who complete the certificate programmes are highly positive, and exemplary in the NZSCP programme. |
| | Nearly all graduates of the NZCEL programmes have progressed to higher-level studies (Bachelor's degree at university or a diploma at a polytechnic). The remaining students have gained New Zealand work visas. With only one cohort having completed the NZSCP programme, data is restricted but positive, with all students progressing to Bachelor's at New Zealand universities. A university staff member confirmed that these students are performing at a very high standard, which |

| | provides strong evidence that universities are gaining capable and committed students. |
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| | ICNZ intends to track certificate students and report on this longitudinal data. Currently, contact and information is contained in social platforms and with individual staff members who share this knowledge at staff meetings. This process needs formalising and steps put in place to ensure that stakeholder feedback and evidence provides quality information for analysis. This could include consultation over surveying methodology and any necessary redrafting. |
| Conclusion: | ICNZ students gain a broad range of valued outcomes relative to their English language learning journey. Self-assessment of these outcomes could be strengthened by using the existing information held informally for analysis and evaluation. |

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

| Performance: | **Good** |
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| Self-assessment: | **Good** |
| Findings and supporting evidence: | There have been several changes to programme delivery since the last EER, with the introduction of the online, offshore NZSCP programme and the temporary option for older training scheme students to learn online at home. These options have enabled continued access to learning for the students, although there are currently only beginner and advanced levels available for training scheme students. |
| | The transition to these new and updated programmes has been well managed, with careful oversight by the principal to ensure that programmes are delivered in line with NZQA approval requirements. This includes serious acknowledgement and policies around academic integrity that are well understood by staff and students. There is also good evidence of discussion and engagement with stakeholders on programme development. |
| | Ensuring that programme reviews were undertaken was a recommendation from the last EER, and this has been completed for all programmes. Recording and reporting on more in-depth data would guide and develop these programme |

| | reviews more professionally. This would involve comparative analysis of progression rates across cohorts, information on graduate outcomes, with qualitative comment from stakeholders, |
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| | Programmes are delivered by a small and dedicated group of well-qualified teachers who respond to the individual needs of their students. Resources are sufficiently varied and appropriate to the programmes and the needs of the students. ICNZ is intending to broaden the scope of resources through the development of a student learning management system which will offer an improved range of materials. Internal moderation occurs routinely and is overseen by the principal, although it is not evident how this process is recorded and tracked, and what changes have resulted. |
| | ICNZ is building capability around assessment design and marking judgements, with evidence of improved practice through successive NZQA moderation reports and from the external moderator. The action plans developed by ICNZ in response to the 2020 and 2021 national external moderation reports provide some sound evaluative comment on actions taken. In addition, ICNZ has provided significant professional development around moderation and assessment for teaching staff. Completing the recorded outcome and closing the loop would strengthen this quality assurance process. |
| Conclusion: | Programmes are clearly meeting the needs of the students and stakeholders. Learning activities and resources are well matched to the students. The recent moderation results have been taken seriously by ICNZ, and there is evidence that capability is improving. |

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

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| Performance: | **Excellent** |
| Self-assessment: | **Good** |
| Findings and supporting evidence: | There are clear systems and processes to support students through their learning journey. The teachers, student support staff and the principal are proactive in their approach to guiding students academically and pastorally. An open-door policy, regular meetings and the use of a range of social platforms ensure that staff and students are well connected.<br><br>Students can comment on their learning experience, and there is evidence that their feedback is responded to, for example by providing more excursions for training scheme students. Capturing student voice could be better evidenced in programme reviews and developed, for example seeking in-depth responses from comparative cohorts (online students or age-related demographics). ICNZ is yet to develop a strategy to ensure disabled students receive comparable outcomes.<br><br>ICNZ offers students a strong orientation programme which is backed up with student and programme handbooks and provides students with consistency of information. Student goals and objectives are collected at orientation and monitored through regular progress checks. There is good oversight of agent relationships, with regular updating of policy and procedure, visits and annual evaluation of their performance.<br><br>Online, offshore students are well informed about the organisation's processes and contact staff regularly. Assessments are generally returned to students within one week, and students interviewed said that teacher feedback was useful and that they supplied clarifying examples. Temporary online provision of the training schemes in response to Covid-19 was extended to provide continued access to study for some of their more vulnerable older learners.<br><br>Attendance is well monitored, and an audit of student files showed evidence of high rates of attendance across all programmes and modes of delivery. The few students residing in homestay are well managed. Policies and processes for the care and support of under 18-year-old students are documented in the quality management system. This information needs to be |

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| | transferred to more operational documents to support and guide staff.<br><br>A particular highlight is the support provided to certificate students who are intending to transition to degree programmes in New Zealand. Support staff are effective at working with pathway institutions to ensure a successful transition. One example of this was negotiating successfully with a university to delay entry for ICNZ students until they complete their foundation studies. |
| Conclusion: | ICNZ staff effectively guide and support individual students on their learning journey. ICNZ has a range of sources of information which provide insight into student needs and outcomes. Integrating these systems with more in-depth evaluation of responses will guide academic and pastoral support judgements. |

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

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| Performance: | **Good** |
| Self-assessment: | **Good** |
| Findings and supporting evidence: | A period of transition and regrowth since the last EER has been ably led by a hands-on director and principal. The role of governance is borne by an experienced advisory board that meets annually. The board and management have a strategic plan, and SWOT[2] analysis is used to guide direction and evaluate performance. However, reflective analysis of performance against the strategic plan could be strengthened, for example evaluation of key performance indicators and how well they are being met.<br><br>There is good evidence that there has been some sound investment in strengthening the input from external stakeholders. This includes some guidance and support around strategic planning and the professional development of staff – mostly around assessment and moderation. Increasing the input from the advisory board is worth considering as ICNZ seeks to broaden the scope of programme provision. |

[2] Strengths, weaknesses, opportunities, threats

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| | Staff are appropriately qualified, with relevant English teaching qualifications, and some with experience in delivering education using online learning platforms. Extending the professional development of teaching staff to cover innovations in teaching and learning practice will further support ongoing best practice. There is a system of observation and review of staff, all of whom feel involved and valued in the organisation. Formalising the difference between professional development and staff appraisal needs to be clear to guide and inform staff. |
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| | Management and academic minutes show that there is a process for airing and reflecting on performance, and that this extends to self-assessment against the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021. |
| | ICNZ has responded to all the recommendations from the last EER, and is strengthening the rigour of some of the changes evident in their self-assessment – using appropriate partners in the English language training schemes to benchmark performance and share good practice. |
| Conclusion: | Overall, the systems and processes that inform management and governance in supporting educational achievement have improved since the last EER. Further development and refinement of these quality assurance systems will strengthen performance for this key evaluation question. |

## 1.6 How effectively are important compliance accountabilities managed?

| Performance: | **Good** |
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| Self-assessment: | **Marginal** |
| Findings and supporting evidence: | Management of compliance accountabilities is primarily the responsibility of the director, and this is mostly well managed – for example, in meeting programme registration and approval accountabilities. The director conducts a weekly audit of files and lesson plans, along with monitoring and ensuring that attendance, visa and insurance requirements, for example, are all in line with company policies. An audit of student files confirmed that administration and enrolment requirements are met and that there are clear systems to manage student information. |

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|  | Reporting to NZQA has been variable; there has been some late reporting of credits, along with extensions to financial reporting. ICNZ needs to ensure that its system for managing compliance accountabilities is robust, and to improve on past performance. Until ICNZ meets the NZQA national external moderation standard, there is a condition that ICNZ must not have more than 30 students enrolled at any given time on the NZCEL Level 4 (Academic ) programme.

In response to ICNZ's 2019 self-review of its performance against the Code of Practice, NZQA noted three strengths in performance and required one process to be improved. ICNZ acted promptly on this requirement. Staff are now transitioning to self-assess their performance against the updated Code of Practice. |
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| Conclusion: | There has been some variability in performance for this key evaluation question since the last EER. Any problems raised have  been responded to well. However, breaches in managing accountability with NZQA point to a gap in self-assessment capability. |

# Focus areas

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

## 2.1 English for Beginners; English for Advanced (Training Schemes)

| Performance: | **Good** |
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| Self-assessment: | **Good** |

## 2.2 Focus area: New Zealand Certificate in English Language (Academic) (Level 4); New Zealand Certificate in Study and Career Preparation (Level 4) (Commerce)

| Performance: | **Good** |
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| Self-assessment: | **Good** |
| Findings and supporting evidence: | Although the 2021 national external moderation highlighted some variability in assessment design and marking judgements of a newly delivered programme, the highly positive and well-evidenced outcomes for students indicate that the two programmes are easily meeting stakeholder needs. Staff capability in managing assessments is well supported and improving. Internal and external moderation processes show signs of improvement. |

## 2.3 Focus area: International students: support and wellbeing

| Performance: | **Good** |
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| Self-assessment: | **Good** |

# 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 ICNZ College of New Zealand Limited:

- Extend the guidance of external advice and provide evidence of their input into management documents. This guidance may include advice on strategic planning and prioritising of future programmes to ensure stable succession planning. It may also include input and guidance from appropriate English language partners.

- Extend the externally led professional development of teaching staff to include innovations in teaching and learning practice.

- Develop the process of programme review further. Report and evaluate performance over and across cohorts, using comparative analysis, to assess how effectively programme design and delivery leads to student progression and 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 that ICNZ College of New Zealand Limited:

Ensure credits for students are reported to NZQA within three months following assessment, as per Part 2 – Maintaining consent and approval Section 13(1)(b) of the Consent to Assess Against Standards on the Directory of Assessment Standards Rules 2021. Policies and procedures on credit reporting must be amended, and relevant staff must be advised, to comply with said Rules.

# 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 fraud[3]*

- *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.*

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[3] 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.

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# 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 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.*

*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. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.*

*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. The Private Training Establishment Registration Rules 2018 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, 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](www.nzqa.govt.nz)). All rules cited above are available at [https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/](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/](https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/).*

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NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz

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