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Report of External Evaluation and Review

Bethlehem International School
Limited trading as Bay of Plenty
English Language School

Confident in educational performance

Confident in capability in self-assessment

Date of report: 31 January 2018

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MoE Number: 7551
NZQA Reference: C25666
Date of EER visit: 10 and 11 October 2017

Final Report

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:	Bethlehem International School Limited trading as Bay of Plenty English Language School (BOPELS)
Type:	Private training establishment
First registered:	21 January 2003
Location:	127 Durham St, Tauranga
Delivery sites:	As above
Courses currently delivered:	General English (various levels as required) IELTS preparation
Code of Practice signatory:	Yes
Number of students:	At the time of the external evaluation and review (EER), BOPELS had three domestic students and 28 international students enrolled in its programmes. The numbers change on a weekly basis, and on average there are 25 students over the course of a year. The average length of study is nine weeks. BOPELS' learners represent approximately 16 nationalities, which is significant considering the small size of the school and learner numbers.
Number of staff:	Two full-time and five part-time staff
Scope of active accreditation:	Training Schemes: <ul style="list-style-type: none">• Bay of Plenty Language School General

English Course (Level 4)

- Certificate in Foundation Studies (Level 3)

In addition to the training schemes listed above, BOPELS holds consent to assess a range of unit standards and domains in English language (to level 6).

Distinctive characteristics: The Christian Education Trust owns Bethlehem International School Limited, which trades as Bay of Plenty English Language School (BOPELS). The trust also owns other education entities, each of which is grounded in Christian philosophy. The Christian Education Trust provides central services such as finance, information technology and property services to BOPELS and the other entities it owns, allowing management to focus on the educational performance of the school. BOPELS predominantly enrolls international students and offers General English language and IELTS (International English Language Testing System) preparation programmes.

Previous quality assurance history: This is BOPELS' third scheduled EER. The last EER was conducted in October 2013, at which time NZQA was Confident in BOPELS' educational performance and Confident in its capability in self-assessment. The 2013 EER report recommended that BOPELS: 'continue to embed stakeholder surveys into its processes, and systematically review the informal and unsolicited data collected to identify trends and enable meaningful use of the data to gain a stronger understanding of outcomes'.

NZQA has not noted any risk issues since the last EER.

2. Scope of external evaluation and review

Three focus areas were included in this evaluation. Together they cover all of the current student enrolments and the mandatory focus area for international providers.

Focus Area 1: General English

This is BOPEL's largest programme area.

Focus Area 2: IELTS Preparation

Focus Areas 1 and 2 encompass the entire course delivery by BOPELS.

Focus Area 3: 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, from August 2016 NZQA introduced a standard focus area for all EERs of TEOs that enrol international students. This focus area examines 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.

Prior to the EER, the (then) lead evaluator spoke by telephone and visited BOPELS and met with the international manager and the principal to agree the scope and process for the EER. Unfortunately, the appointed lead evaluator was unable to complete the EER due to an unrelated accident and injury the day before the EER was scheduled to occur. The EER was deferred for one week and a new lead evaluator appointed at short notice.

The evaluation team of two evaluators then spent a day and a half at the BOPELS headquarters in Tauranga, where they reviewed an extensive range of documentation and met with: the board chair and one director; the management team; support and administration staff; and three tutors. The evaluators also had conversations with representatives of client and stakeholder organisations. A sample of students was randomly selected by the lead evaluator from class lists. The evaluation team then met with these students and viewed their student files.

During the site visit, BOPELS provided the evaluation team with a range of operational documentation, including training and planning materials, quality management policies, enrolment information and policies, agent agreements, student achievement records, student evaluations, collated analysis of student satisfaction levels, and course delivery and assessment materials. This documentation complemented the detailed self-assessment information that had been pre-submitted by the organisation. The evaluators reviewed all materials tabled and were able to review a sufficient range of evidence to reach evaluative judgements.

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 fraud¹*
- *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.*

¹ 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.

Summary of Results

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

NZQA is **Confident** in the educational performance of and **Confident** in the capability in self-assessment of **Bethlehem International School Limited, Trading as Bay of Plenty English Language School.**

The EER team's interviews with students, governance, management and staff, and a selection of key stakeholders demonstrated the success, extent and benefits of the educational performance of BOPELS. The reasons for NZQA's confidence can be summarised as follows:

- The students are achieving good results and acquiring useful and meaningful skills and knowledge, evidenced by feedback from students, graduates and education agents. Students are generally realising good value from their study at BOPELS.
- Staff at BOPELS demonstrate a good understanding of the factors that lead to student achievement, and structure teaching and learning to engage students and facilitate their success.
- BOPELS has student support structures that are appropriate to the needs of its students and engage the students to help them achieve their goals. New students are placed at an appropriate level and monitored carefully to ensure they are learning. Teachers are enthusiastic and caring about their students and curriculum and they are well supported by management.
- While BOPELS has a strong commitment to be compliant, its systems for monitoring its compliance accountabilities have some notable gaps and weaknesses. These gaps have not to date had an impact on students or the organisation but do constitute a risk.
- The organisation is soundly and sustainably managed. Leadership is strongly values based, resulting in a very culturally inclusive, respectful and student-centric environment.
- BOPELS' processes are generally effective in ensuring that student and stakeholder needs are understood and met, and appropriate standards are maintained. However, some self-assessment processes are not, at this stage, being used effectively and need to be embedded into a planned, sustained and co-ordinated approach across the organisation to demonstrate excellence in self-assessment capability.

Findings²

1.1 How well do students achieve?

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**.

Students at BOPELS are achieving good results as a consequence of good teaching and high-quality student support. Students take an online entrance test to assess their level, along with an interview where the learning aims and purpose of enrolment of the students are noted. Their progress is measured regularly by way of formative testing conducted daily and weekly, and summative testing monthly or as appropriate. Regular individualised feedback to learners provides the opportunity for continuous self-review of personal learning aims. Personal growth and improved learner autonomy are one of the outcomes. Student surveys are conducted early on, during study and at exit, and show a high level of satisfaction with the students' overall experience.

BOPELS enrolls a diverse range of students from a range of nationalities, ages and motivation for studying English. Some students may enrol for several months with a view to lifting their English level for further study, while others may enrol for as little as two weeks while on a holiday programme or as preparation for a working holiday or travel. The small and inclusive environment allows for individual learning plans which are well supported. A small number of students take the IELTS test and exit feedback supports evidence that the students feel well prepared for the external exam.

Students participate in activities outside of the classroom, such as field trips, visits to cafes, taking public transport etc, in which they practise their English-speaking skills and learn new vocabulary. Student evaluations have revealed to BOPELS that students value this method of learning English. Through doing so, students enhance their learning about the local community and gain an appreciation of different cultures.

BOPELS collects student progress data which is entered into an in-house database. The office manager is responsible for maintaining and overseeing the student management system, including the student progress data. A systematic and transparent meeting schedule with staff and students ensures student progress is understood at an individual level. Further opportunities for aggregating data in a

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

way that is meaningful to the organisation exists and could be explored to benefit the organisation as a whole.

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 **Good**.

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

Students' goals and motivation are identified at the commencement of their course and regularly assessed by staff to see if those goals are being met. For instance, most students enrol to improve their speaking and listening skills. At monthly performance meetings, students are encouraged to reflect on their goals, and staff help them to identify any barriers to achieving them and help students to overcome those barriers.

Students value the opportunity to learn English in a regional environment. Opportunities for learning outside the classroom and engaging with the local community are valued. The wide nationality mix provides growth in cross-cultural understanding and promotes long-lasting friendships.

BOPELS has anecdotal information about most of the graduates and the positive way in which the programmes have contributed to their lives. Through exit interviews, staff know the immediate destination of every graduate and graduates are encouraged to keep in touch with the organisation via email and Facebook.

Approximately 30 per cent of BOPELS' English language graduates move into further higher-level study with other PTEs, polytechnics or universities. BOPELS has formal pathway agreements with one polytechnic and one university. Although BOPELS staff know when graduates move into higher-level study through the exit interview process, they have only anecdotal information about how well these students achieve at higher levels as a result of their preparation at BOPELS. A greater effort to collect and analyse destination information would provide useful intelligence to inform improvements in teaching and course design.

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 **Excellent**.

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

BOPELS' ability to meet the individual, personal and academic goals of every student is a strong feature of the organisation. Students are asked at the beginning

of their study what they want to achieve. This information is made available to teachers who use it in their planning to ensure that course content and context is matched to the needs of the students. BOPELS uses a variety of mechanisms to understand students' needs. Teachers meet with individual students weekly to review their progress and provide them with a progress report. Staff and students interviewed at this evaluation confirmed that this was valued and contributed well to their overall progress.

BOPELS aims for a diversity of nationalities on campus whereby no one group significantly outnumbers any other. This mix not only exposes the learners to other nationalities and cultures, but also encourages them to speak English on campus, thereby complying with BOPELS' English-only philosophy.

BOPELS seeks feedback from learners through a variety of mechanisms. As well as the formal student feedback process, staff have an open-door policy and it is clear that students approach them with problems and issues.

There was evidence of good teaching practice at BOPELS. Staff are enthusiastic about their curriculum and teaching and they are well supported by management. Every staff member at BOPELS has a role in student learning and they take a collegial, whole-of-organisation approach to ensuring that all students achieve. Teachers and students relate well to each other and students spoke highly of BOPELS' teaching staff. This strong rapport between students and staff was evident from discussions and evaluation survey outcomes. The low staff-to-student ratio allows for individual attention when appropriate.

A curriculum review is undertaken at the end of each academic year, when all teaching material is reviewed and a decision is made whether to continue with the current material. There was evidence of BOPELS purposely providing opportunities for staff to participate in meaningful discussion about teaching practice and student progress. Teaching staff spoke about how they share ideas, experiences and knowledge through their daily interactions, staff meetings, peer observations and professional development activities. Weekly staff meetings provide a forum for discussions on current material being used, and feedback is recorded and taken into consideration as necessary. The organisation has regular teacher development sessions which staff are paid to attend. These sessions are topical and are occasionally facilitated by an external expert. A few staff are also engaged in ongoing external professional development.

BOPELS has a thorough system for students to evaluate and provide feedback on teaching and other aspects of their programme. This feedback is then analysed and discussed (although not necessarily systematically acted on), and reported back to students in a timely manner. The formal feedback from students, as well as the wealth of informal comments, provides teaching and management staff with valuable information which is used to identify new and improved teaching and learning strategies.

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

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

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

The organisation is providing a safe and supportive learning environment for its students. Students receive sound pre-enrolment guidance, and a comprehensive orientation programme is available to them in their first week of study. Staff of different nationalities are available to support the students. The religious needs of students are appropriately catered for.

The principal has overall responsibility for ensuring that the requirements of the Education (Pastoral Care of International Students) Code of Practice are met, and she regularly attends professional development offered by NZQA's Code Administrator. The organisation periodically (at least once per year) self-reviews its compliance with the code. BOPELS has provided the required attestation to NZQA that it continues to meet these requirements. However, some administrative oversights were identified at the EER (refer Findings 1.6).

There is a designated support staff member with 24-hour phone contact should the students require assistance when away from the site. Homestay accommodation for international students is managed by the principal who visits all homestay providers on a regular cycle to inspect and evaluate their suitability. Those providing accommodation for under 18-year-old students are visited every three months. BOPELS occasionally accepts international students under the age of 18 years. Staff are fully aware of their Code of Practice obligations for these students and ensure they are meeting them.

The results and conclusions drawn from the regular student questionnaires provide information for BOPELS to use in its assessment and continuous improvement of support structures.

BOPELS has introduced a process for monitoring punctuality and attendance in the belief that students who attend classes have a greater chance of success. While the system is strictly enforced, it is supportive and seeks to identify and address the reasons why students may not be attending classes. Although staff intuitively understand the positive correlation between attendance and progress, this has not been examined on a formal basis.

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 **Adequate**.

BOPELS has developed and embedded effective systems for monitoring student achievement and actively supporting staff to improve educational outcomes. The current student management system uses an 'off the shelf' database and spreadsheet software. Although this system is sufficient for the small number of current students, BOPELS has plans to grow. If so, a more comprehensive system will provide easier access to information. Monitoring of performance at all levels of the organisation is regular, authentic, transparent and open. It is also supportive, student-centric and focused on improvement.

Governance and management have created an organisation that enthusiastically encourages opportunities for reflection on its role and how to better meet student and other stakeholder needs. This has led to a reflective environment and respectful culture throughout. Evidence indicates that management and staff actively seek feedback from many sources to use as a learning and improvement tool. As previously discussed, there were a few areas noted where feedback and improvement loops were not quite being completed. The organisation is collecting feedback and data and analysing it, but not using it systematically to make improvements.

The organisation has, over time, employed, developed and retained a competent, well-qualified and dedicated group of staff. The evaluation team observed coherence across all staff in their focus on giving students the best experience possible, to equip them to perform and achieve. Staff are supported by the organisation in their professional development, although a greater level of external engagement in their professional development would be beneficial. Staff clearly enjoy the environment and are valued.

The campus is ideally located in the Tauranga central business district. The organisation is sufficiently supplied with physical and learning resources for the number of students that it currently has. A central hub area maximises student interaction and provides opportunities for students and staff to play board and card games and engage in conversation, all of which aid their English acquisition. A small library is available for students to use. Learning resources, although effective and fit for purpose, are not 'leading edge'. Modern technologies are not available for use in educational delivery.

1.6 How effectively are important compliance accountabilities managed?

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**.

As a small business in New Zealand, BOPELS has compliance accountabilities to several agencies and regulatory bodies. Although the organisation has a strong emphasis on compliance and genuinely wishes to do the right thing, shortcomings in administration systems and staff training have led to some accountabilities not being met.

Random samples of the student files selected and checked during this EER revealed that most of the necessary information on each student was accurate and readily accessible. This included pre-entry guidance and verification of entry criteria, including English test scores, formative assessments at enrolment, insurance and visas. However, the evaluators identified that in four of the eight student file samples checked, the insurance coverage for students did not meet Code of Practice requirements. In one case, a copy of the student visa was not held on file. There were several reasons behind this non-compliance: the person responsible for checking that the information was correct and met requirements did not have a full and complete understanding of the code requirements and had not attended training; and responsibility for arranging insurance and responsibility for ensuring that details are held on file were delegated to a single person. Simple human error was not identified because the organisation did not have appropriate systems to manage or mitigate it. The above issues aside, the intended outcomes from the Code of Practice are generally being met.

Retention on programmes is high. Student surveys are conducted early on, during study and at exit, and show a high level of satisfaction with the support provided and the students' overall experience. The administration of entry and enrolment and the scrutiny of agents is sound, as required by Immigration New Zealand and NZQA. Attendance expectations as they pertain to programme success and visa rules are well managed. Warnings and sanctions are fairly applied when student attendance falters.

NZQA attestations and returns have been met within required timeframes. The courses are being delivered consistent with NZQA approvals. All staff are either employed or contracted and said they had current contracts or agreements. There is systematic and robust appraisal of individual staff performance.

Focus Areas

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

2.1 Focus area: General English

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

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

2.2 Focus area: IELTS Preparation

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

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

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 Bethlehem International School Limited trading as Bay of Plenty English Language School:

- Ensure that staff with responsibilities to the Education (Pastoral Care of International Students) Code of Practice are provided with appropriate training.
- Develop systems to proactively manage compliance accountabilities. Consider ways to use student performance data more systematically to inform improvements to teaching practice and course delivery.
- Consider whether staff members having a greater level of external engagement in their professional development, including greater affiliation with relevant professional bodies, would be beneficial to teaching and learning.
- Consider updating resources and delivery methods.

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/>.

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