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External Evaluation and Review Report

Communications International
Education Limited trading as Tasman
International Academies

Date of report: 27 September 2019

About Communications International Education Limited trading as Tasman International Academies

Tasman International Academies (Tasman) delivers education solely to international learners in the disciplines of English language, business, information technology (IT) and digital marketing from levels 2-7.

Type of organisation:	Private training establishment (PTE)
Location:	Level 7, 290 Queen Street, Auckland
Code of Practice signatory:	Yes
Number of students:	International: 231 learners at the time of the EER
Number of staff:	19 staff
TEO profile:	See: NZQA – Communications International Education Ltd
Last EER outcome:	At the last EER (reported February 2016) NZQA was: Confident in educational performance; Confident in capability in self-assessment.
Scope of evaluation:	<ul style="list-style-type: none">• International Students: Support and Wellbeing (all learners, n=231)• New Zealand Certificate in English Language (Academic) (Level 4) (NZCEL Level 4) 59 learners• New Zealand Diploma in Information Technology (Technical Support) (Level 5) (ITTTS Level 5) 23 learners• Diploma in Information and Communication Technology (Support and Operations) (Level 7) (ICT Level 7) 96 learners <p>All these programmes are NZQA-approved.</p>
MoE number:	7805
NZQA reference:	C37827

Dates of EER visit:

On-site visit: 15-17 May 2019

Additional information requested at the EER visit was provided by Tasman on 23 May 2019. The finalised ICT Level 7 NZQA moderation report was released on 4 June 2019. The evidential synthesis for the EER was conducted on 5 June 2019. Further information was requested of, and provided by, Tasman on 11 June 2019.

NZQA finalised the NZCEL Level 4 moderation report on 30 August 2019, shortly after the finalisation of a first EER report. The EER report has been updated to incorporate the finalised moderation results.

Summary of Results

There is inconsistent quality of self-assessment information and processes resulting in inconsistent performance and learner outcomes. Much work is still needed to improve and embed quality. There are some significant gaps that need addressing.

Not Yet Confident in educational performance

- Actions and improvements have been implemented after conditions were placed on Tasman's accreditation to provide business diplomas in 2018. It is not evident that foundational issues have been addressed across the organisation. Tasman recognises that there is still much work to do, and its ongoing focus is on quality and capability.

Not Yet Confident in capability in self-assessment

- Actions to improve have not been applied uniformly. Several key issues remain unaddressed in the ICT Level 7 programme, including issues impacting low achievement. In May 2019, NZQA found significant assessment issues in that programme.
- A key focus has been on the business and NZCEL Level 4 programmes. Management has built the team culture in the NZCEL Level 4 programme and learners report strong satisfaction, achievement and met needs. However, assessment issues found by NZQA moderation undermine the credibility of the qualifications awarded.
- The EER found instances of undetected non-compliance with the Code of Practice and other issues, detracting from effective compliance management.
- Tasman effectively tracks graduate destinations, but the use of findings is limited. There is limited external understanding of the value of the programmes for graduates.
- The quality of self-assessment information and processes is inconsistent. In some instances, issues are identified but not addressed, or gaps are not self-identified. In other instances, there is good data capture and analysis and improvements made.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>NZQA has recently found significant issues with the quality of assessment in five of Tasman's programmes.² In 2018 and 2019, Tasman worked to remedy the business programmes, which required learners to be re-taught and reassessed.</p> <p>NZQA's June 2019 ICT Level 7 moderation report found learners have been unable to meet all required learning outcomes given flaws in assessment design. Most assessor decisions were unverified. Low pass rates in 2018 are identified as relating to a stricter pre-enrolment process and marking, as well as issues with three courses, which are yet to be fully addressed. There is no reassessment opportunity. Therefore, re-enrolment rates have been high, e.g. 10 of 15 learners in term one.</p> <p>Overall 2017 and 2018 qualification completion rates for the NZCEL Level 4 are above the PTE's 80 per cent target. Learners report strong progress. NZQA's external moderation results were positive in 2018; however, in 2019, NZQA moderation has found that the number and nature of issues identified in the learner samples reviewed undermines the credibility of the qualifications awarded.</p> <p>Inconsistencies in data reporting include qualification completions sometimes calculated to include withdrawals and sometimes not. Reasons for withdrawals are identified for NZCEL Level 4 (not programme-related), but not for IT programmes.</p>
Conclusion:	Learners' ability to achieve in five of Tasman's programmes has been compromised by significant assessment issues.

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

² New Zealand Diploma of Business (Levels 5 and 6), Diploma in Digital Marketing (Level 7), Diploma in Information and Communications Technology (Support and Operations) (Level 7), New Zealand Certificate in English Language (Academic) Level 4.

	There are inconsistencies in data analysis and reporting.
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1.2 What is the value of the outcomes for key stakeholders, including students?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>While Tasman has good tracking of learner destinations, the use of this information is limited. For example, most ICT Level 7 graduates are not in ICT-related employment (around 30 of 40 graduates when surveyed). However, no analysis and/or action has been taken in relation to that finding.</p> <p>The PTE does not collect or analyse information to understand how well its graduates do in higher study or employment. This information gap limits an understanding of how Tasman's programmes have met learners' and stakeholders' needs.</p> <p>NZCEL Level 4 learners and graduates value the programme for the entry it provides them to higher study. These learners interviewed during the EER identified the extensive gains they felt they had made with their confidence and English language usage.</p> <p>Most of the NZCEL Level 4 and ITTS Level 5 graduates who progress to higher study do so with Tasman. However, as mentioned, no information is collected or analysed to demonstrate how well learners do once in higher study either with Tasman or with other providers.</p>
Conclusion:	Tasman has a good process for tracking graduate destination outcomes, but little information is captured about the value of programmes from graduates, employers or other stakeholders. There is variable performance across programmes. Destination data does not show strong outcomes for ICT Level 7 graduates, whereas NZCEL Level 4 learners and graduates say the programme has added value and met their needs.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Significant issues with the quality and validity of assessment in five of Tasman's programmes in 2018 and 2019 indicate that these programmes do not match the needs of learners or key stakeholders.</p> <p>Programme resourcing seems mostly sufficient. However, staff say that slow internet speed affects the pace of teaching and research in the IT area and is a long-standing concern. NZCEL Level 4 learners have used their own phones to record presentations. The PTE intends acquiring a camera to do this.</p> <p>Industry involvement is limited in the delivery of IT programmes, and this may be one contributing factor to the low number of ICT Level 7 graduates gaining employment in this field. Tutors informally use their own industry networks to understand industry developments. It was not clear how robust and systematic that process is to ensure the validity and currency of information collected to contribute to programme review.</p> <p>The local advisory committee is newly formed in 2019 and has met once following just one meeting of the previously constituted committee in 2018. Some of the graduates are on the committee, having only recently completed their studies. Therefore, at present they have limited insights to contribute from their post-study experiences.</p> <p>Each programme undergoes an annual programme review but there is variability in the quantity and quality of information. The NZCEL Level 4 programme has recently undergone a review resulting in NZQA-approved programme changes, including extending the programme by two weeks based on identified learner needs and sector consultation. Identified issues in the ICT Level 7 programme are yet to be effectively addressed.</p>
Conclusion:	Significant issues with assessment and variability in performance and review across programmes does not demonstrate strong matching of learner and stakeholder needs.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Learners value the academic and pastoral support provided, including one-to-one support if learners struggle or have specific needs. However, there are also processes and gaps that negatively impact the quality and level of information and support provided.</p> <p>Not all information provided to learners is accurate, clear or consistent. For example, the ICT Level 7 student handbook and quality management system document refer to a reassessment opportunity in the ICT Level 7 programme, but the absence of this option is a key concern for learners. Different programme handbooks are inconsistent in how attendance expectations are conveyed and could be clearer. Leading up to and at the time of the EER visit, not all programme information on the Tasman website was accurate – the website was under review and has since been revamped.</p> <p>At times, the ICT Level 7 class has around 30 learners. This number has an impact on the extent to which staff can give one-to-one time. NZCEL Level 4 learners do not receive written reports on their progress during the programme – feedback is verbally provided but there is not a systematic process in place to ensure that this occurs consistently and systematically.</p> <p>Learners are surveyed at orientation and during and at the end of the programme. Feedback is collated and reviewed. Examples of changes made as a result of feedback include gaining NZQA approval to extend the NZCEL Level 4 programme by two weeks, and offering new elective options in the ICT Level 7. Summarised learner feedback, and proposed or actual actions that result, are not relayed back to students. Therefore, they are unaware of whether or how their feedback is used.</p>
Conclusion:	Performance is variable. Learners confirmed satisfaction with the level of support they receive. But there are also processes that negatively impact the quality and level of information and support provided.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>It is appropriate that the PTE's prime focus at this time is on building programme quality and staff capability, including internal moderation. Staff, learners and stakeholders value the availability of management through this process.</p> <p>However, there has been an uneven focus on improvement across the PTE. Significant effort was required and given in the business area due to remediation work needed following adverse NZQA monitoring in 2018. NZCEL Level 4 is also a relatively new programme that has been developed. Meanwhile, issues identified in the ICT Level 7 are unaddressed. Moreover, NZQA's June 2019 moderation report has found significant issues with assessment in that programme. Compliance gaps found by this EER also indicate that oversight has not been even and robust.</p> <p>The PTE recognises that there is still much improvement required and that this will take time. It believes that assessment and moderation practices have improved, assisted and supported by internal staff moderation and assessment training; however, this is anecdotally known rather than evidenced. Similarly, improvements around plagiarism are known anecdotally. Examples of internal moderation sighted showed limited staff feedback compared with more comprehensive feedback provided by external moderation.</p> <p>A cluster-group approach to moderation has been implemented for NZCEL Level 4 and is contributing to the building of a team culture and focus on the importance of assessment and moderation.</p>
Conclusion:	Governance and management are focused on building quality and capability, but gaps and weaknesses identified show that this focus is uneven and yet to embed across all key areas.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Poor
Self-assessment:	Poor
Findings and supporting evidence:	<p>The following issues do not demonstrate effective management of important compliance accountabilities or that the PTE is meeting minimum expectations.</p> <ul style="list-style-type: none"> • Not all key staff are aware of all Code of Practice obligations. • Tasman has not been ensuring that learners' insurance commences from before they depart their home country, in accordance with the Code of Practice. Also, not all current students have been insured from their commencement date at Tasman – this was an issue in six of 11 student files reviewed. • The PTE has used its internal English language proficiency test in 2019 to assess required language levels to enrol on NZCEL Level 4. NZQA withdrew approval to use that test in March 2018. • The PTE currently does not meet 6.1 criterion 1 of the NZQF Programme Approval and Accreditation Rules. <p>In the case of some learners being uninsured after their Tasman start date, the risk could have been significant for learners who would have been unprotected from significant financial loss arising if involved in any incidents while uninsured. Of concern is the obvious gap in the PTE's procedures to ensure that all learners are appropriately insured, which had not been self-identified.</p>
Conclusion:	Several compliance concerns found during the EER do not demonstrate effective management of key compliance accountabilities or self-review, or that minimum expectations are being met.

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

Performance:	Marginal
Self-assessment:	Marginal

2.2 Focus area: New Zealand Certificate in English Language (Level 4)

Performance:	Marginal
Self-assessment:	Marginal

2.3 Focus area: New Zealand Diploma in Information Technology (Technical Support) (Level 5)

Performance:	Marginal
Self-assessment:	Marginal

2.4 Focus area: Diploma in Information and Communications Technology (Support and Operations) (Level 7)

Performance:	Marginal
Self-assessment:	Marginal

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 Communications International Education Limited Trading as Tasman International Academies:

- Strengthen reporting and analysis of learner achievement data to ensure consistency and clarity and to understand and incorporate learner withdrawal information.
- Introduce processes to gauge and evidence the extent of improvements made over time, e.g. tracking rates of plagiarism found in each programme.
- Review the absence of a reassessment opportunity in the ICT Level 7 programme and ensure consistency between internal policy and practice and information provided to students and in the documentation that supported programme approval.
- Introduce a systematic and regular process for interim progress reporting to NZCEL Level 4 learners.
- Develop a process to understand how the NZCEL Level 4 and ITTS Level 5 programmes prepare learners for higher study, and to gain employer input on ICT Level 7 graduates' preparedness for the workplace.
- Review the level of industry involvement in the delivery of programmes in the IT faculty.
- Review the effectiveness of the current practice whereby industry input is informally obtained through tutors' personal networks.
- Effectively review and respond as appropriate to issues that have been identified in the ICT Level 7 programme, including significant assessment issues, internet speed, class sizes, and the specific issues self-identified which have negatively impacted learner achievement in different courses.
- Continue with tutor assessment and moderation training to strengthen assessment and moderation capability across the organisation.

- Consider placing responsibility for the selection of learner samples for moderation with the moderator rather than the tutor/assessor, in all, not some programmes.
- Achieve consistency in the level of analysis and information in key self-assessment documentation and reporting.
- Undertake a full review of organisational procedures and staff understanding in relation to the Code of Practice and academic entry requirements, and initiate training and new procedures where gaps are identified.

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 Communications International Education Limited Trading as Tasman International Academies to:

- Ensure learners are appropriately insured in accordance with [Clause 16\(5\) of the Education \(Pastoral Care of International Students\) Code of Practice 2016](#).
- Comply with sections [12\(1\)\(a\) and 12\(2\)\(a\) of the NZQF Programme Approval and Accreditation Rules 2018](#) requiring that the institution has the capability and capacity to ensure assessment materials and decisions are fair, valid, consistent and appropriate for the level, given the stated learning outcomes (this is a criterion for accreditation: [section 6.1 NZQF Programme Approval and Accreditation Rules 2018](#)).
- Comply with section [5.1.8\(a\) of the Private Training Establishment Registration Rules 2018](#) and the requirement to operate a coherent system to ensure assessment and moderation requirements are met across all programmes for which the PTE has accreditation.

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 fraud³*
- *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.*

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.

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). All rules cited above are available at <https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/>, while information about the conduct and methodology for external evaluation and review can be found at <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>.

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