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External Evaluation and Review Report

ICENZ Limited

Date of report: 17 January 2023

About ICENZ Limited

The primary focus for ICENZ (trading as Watermark Training and Consultancy, a subsidiary of Swimming New Zealand) is training for the maintenance of pool water quality for swimming pool facilities across New Zealand. The consultancy has also been providing quality assurance management and support services for Rangitikei Enterprise's driver licence training.

Type of organisation:	Private training establishment (PTE)
Location:	C/o Swimming New Zealand, 14 Antares Place, Mairangi Bay, Auckland
Code of Practice signatory:	No
Number of students:	Domestic: 2021, 184 students; 2022, 229 students; Māori, 14 per cent and Pasifika, 1.82 per cent International: nil
Number of staff:	One full-time, six part-time
TEO profile:	ICENZ Ltd T/A Watermark Training and Consultancy (on NZQA website) In July 2022, ICENZ was sold to Swimming New Zealand (SNZ), the national body which promotes water safety and swimming education. Water quality training continues to be provided. The consultancy has, under a memorandum of understanding with Rangitikei Enterprises, provided quality assurance management and support services for driver licence training. The driver training has been paused while the agreement is under review.
Last EER outcome:	At the previous external evaluation and review (EER), conducted in August 2017, NZQA was Highly Confident in ICENZ's educational performance and Confident in their capability in self-assessment.
Scope of evaluation:	Monitoring Pool Water Quality (Level 3) Training Scheme (ID:117138)
MoE number:	8264

NZQA reference: C45332
Dates of EER visit: 5 and 6 October 2022

Summary of results

Watermark's training is highly valued by its stakeholders and learners. Learners are achieving unit standards and gaining certification. The recent change in ownership and staffing has led to generally effective self-assessment practices. However, a more systematic use of data to inform decision-making and strengthening of processes would be beneficial.

Confident in educational performance

- Overall achievement is understood, and learners gain certification on completion of the courses. Organisations meet the New Zealand Pool Quality Standards compliance requirements. However, it is not clear how achievement data is used to inform decision-making.
- Watermark works closely with industry partners, and together with SNZ is seeking solutions to broaden their focus from competitive and high-performance swimming and to promote swimming skills across New Zealand.

Confident in capability in self-assessment

- Structured and well-planned courses are aligned to industry standards and professional practices. Teaching staff are experts in their field and provide engaging educational experiences with strong individualised educational support.
- Programme review is ongoing as industry requirements change and assessments are amended accordingly. External post-assessment moderation across all standard-setting bodies indicates that assessments are meeting their standards. However, prioritising pre-assessment moderation to meet Workforce Development Council requirements would be beneficial.
- Governance and management are highly supportive and innovative, with business decisions being considered with regard to learner performance and stakeholders' ongoing changing needs. Since the recent sale and change in academic leadership, the application of policies and quality management has been variable.

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- Compliance accountabilities are mostly managed well. However, during most of the reporting period there was late credit reporting, which a greater formality of oversight and better understanding of NZQA rules, regulations and compliance requirements would address.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Course completions have been generally strong, with a steady increase in completions between 2018 and 2021, and 58 per cent of learners achieving the unit standard in 2021 (refer Appendix 1). This is below the PTE's target of 75 per cent. Covid has impacted on the face-to-face delivery of courses over the last two years. Non-completions are partly due to the transient nature of the workforce in pool facilities, where in some cases staffing is reliant on tertiary learners who are largely part-time.</p> <p>The practical, real-world components of training alongside the pools' plant and equipment provides learners with important skills such as the accurate measurement of chemicals and the use of technology to assist with a scientific approach to maintaining water quality.</p> <p>Māori (11 per cent) and Pasifika (1.6 per cent) learner completions are tracked. However, the low participation of these learners does not allow for a comparable and accurate understanding of equity in achievement.</p> <p>The strong emphasis and focus on individual student achievement and student progress is closely tracked, although analysis and review of overall achievement data is not yet evident. This is partly due to the recent sale of the organisation and systems still being embedded. Capturing of enrolments and non-completions and reasons for non-completions are understood, but the extent is not measured.</p>
Conclusion:	Learner achievement is generally strong across all courses. Learners gain important knowledge and skills to meet compliance for their organisations. Data collection and analysis should be strengthened to improve understanding of overall achievement outcomes across all courses.

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

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>There is a renewed focus for pool staff to be trained to meet compliance requirements of NZS 5826:2010.² SNZ's mandate is the driving force, with a greater focus on pool water quality to ensure public and private pools are safe for all New Zealanders</p> <p>Learners who achieve unit standard 20046³ are well supported to gain relevant knowledge for their workplaces. Organisations gain compliance through staff certification. Learners make a positive impact in their organisations through improved service and water quality and safety for their swimming clients and the public.</p> <p>Learners are able to apply their skills and knowledge during their training and while they are collecting evidence for assessment. Course completions often lead to new job responsibilities or promotion. Further gains are in learner confidence in the job and better understanding of water quality and treatment processes. There are positive impacts on pool maintenance because good water quality reduces deterioration of the pool plant and need for costly repairs.</p> <p>Watermark and local authorities work closely to identify needs and provide training for these networks. Examples of such engagement are the School Caretaker's Conference and recently the Whakatane District Council sponsored training for local school caretakers. These engagements provide opportunities for discussion and teach staff to think about and work through pool maintenance problems.</p> <p>Some learners are known to pathway to higher-level qualification within the aquatic field. Evidence of value of the course to</p>

² The New Zealand Standard Pool water quality (NZS 5826:2010) requires pool owners and pool managers to meet their responsibilities for public safety by providing robust and efficient pool water quality management systems that ensure that the water used in pools is maintained to safeguard the health of those using the pools.

³ The level 3 unit standard title is Monitoring Pool Water Quality and Storing Pool Water Treatment Chemicals.

	<p>graduates taking up this opportunity was clear in the EER from a graduate and stakeholder.</p> <p>The continued repeat business is an indication of the value of the courses to its stakeholders.</p> <p>There is no evidence that a recommendation from the previous EER report was considered. The recommendation suggested that the PTE develop a mechanism to collect stakeholder feedback to understand the value of the programmes. Under new management, there is an opportunity to understand the further impacts of training by measuring learner gains post-course completions and the value to stakeholders.</p>
Conclusion:	<p>Important and valued outcomes, such as learner certification, improved employment opportunities and further study are evident. Formalising employer and learner feedback to gain an understanding of outcomes would strengthen self-assessment and inform decision-making.</p>

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
Self-assessment:	Good
Findings and supporting evidence:	<p>The highly structured and planned courses are designed by industry professionals to align with the New Zealand Standard to meet industry needs. Industry feedback is considered in the delivery of the courses. The course delivery plan provides consistency between courses and good outcomes for learners in differing stakeholder contexts.</p> <p>Currently, the course content reflects some outdated technology required by the national standard. Course review is expected when the national standard is reviewed in 2023, and related learning resources will be updated to incorporate technology being used in the newer pool facilities.</p> <p>The highly experienced and knowledgeable tutor supports learners in gaining relevant skills, and provides guidance for individual learners as and when needed.</p> <p>There is continuity in assessment material and practices from the previous ownership, with marking guides ensuring consistency in assessment practice. Assessment is completed</p>

	<p>after course delivery and requires learners to collect evidence from their workplaces and their own contexts. The assessment process is well managed, with the tutor providing guidance and clarity for assessment requirements. Assessment is validated by the results of external moderation previously conducted by Skills Active and Connexis, and more recently with Toi Mai Workforce Development Council (WDC).</p> <p>The WDC said that pre-assessment moderation had not been completed to validate the robustness of two unit standard assessments, prior to Watermark using them.⁴ This moderation was done under the previous ownership. Internal moderation has started to occur informally with the education manager.</p> <p>It would be beneficial if internal and external moderation feedback were reviewed, and internal moderation processes were formally documented for purposes of continuous improvement. The assessment policy could be strengthened to include more detail around timeframes for marking and feedback practices.</p> <p>Watermark has self-identified gaps in policies, processes and documentation. Improvements in areas related to design, delivery and assessment are ongoing.</p>
<p>Conclusion:</p>	<p>Courses are well aligned with the New Zealand Standard and meet industry needs. Course delivery and assessment are consistent and relevant to learners and their organisations' context. Self-assessment is informal and would benefit from documented, regular reviews of courses and all moderation feedback.</p>

⁴ From 2023 this a requirement of the WDC.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Learners' needs are established at the start of every course. This information helps the tutor understand where learners may require extra support, such as for those with learning disabilities. Learners from diverse backgrounds are well engaged in the learning experience due to the practical nature of the courses and the experiential, contextualised support provided by the tutor.</p> <p>There are strong relationships between the aquatic organisations and the tutor. The tutor understands the learners' contexts and has a strong focus on building relationships and ongoing connections with learners and their organisations. The tutor's industry expertise is recognised by learners and their employers, who often seek the tutor's advice on pool treatment problems.</p> <p>This learner-centric approach ensures assessment completions in the workplace are effectively supported, with the tutor engaging post-course and providing the necessary academic clarity and encouragement for learners to complete.</p> <p>Learner evaluation feedback provides an understanding of the course and presenter, and their effectiveness for the learner's job. The tutor reviews learner evaluations post-course and takes actions as required. No further analysis of learner evaluations is done. There is an opportunity to strengthen and inform ongoing improvements through further analysis.</p> <p>Anecdotal reports of learners with disabilities (such as dyslexia and hearing impaired) are known. Learners are given an opportunity to identify any disability at the start of the course. However, at this stage this data is not systematically measured or reported on.</p> <p>A self-review of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 was completed by the previous owners in 2021. A review of the learner support policy is suggested to provide guidance on the learner support</p>

	expectations for the tutor and support staff in addressing learner needs and meeting the requirements of the Code.
Conclusion:	Watermark has effective contributing processes to minimise barriers to learning, with systems in place to support learners and engage them in their learning. Review of support and learner engagement policies will strengthen and ensure consistency of learner support practices.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>SNZ is a not-for-profit organisation which acquired Watermark to support its strategic direction. This is a well-considered decision and an opportunity for expansion of SNZ to offer more training through Watermark. The focus of Watermark has changed with the new ownership, bringing a more concentrated approach to training related to SNZ's core business and mission to increase safe swimming in New Zealand. Linked to this key pillar is water quality in pools, a focus on building the knowledge base of swim schools, schools and public pools to have trained and certified staff for maintaining safe water quality and meeting compliance requirements.</p> <p>As a subsidiary of SNZ, Watermark is well positioned to meet these goals and work with SNZ to address the aquatic industry's other training needs. SNZ's education staff are actively engaging with industry networks to promote water quality and educate organisations about compliance requirements.</p> <p>Governance and management are well connected to the industry and rely on their strong industry engagement to set the PTE's strategic goals, working closely with the education team to achieve them. Effective, ongoing communication between staff supports a shared understanding of meeting organisational goals. Monthly reporting on operational activity and benchmarking occurs at senior management and board levels to inform management decisions. Regular informal weekly meetings with teaching staff and management ensure effective communication and collaboration across the organisation.</p> <p>The tutor is well supported in professional development and maintains industry connections. The tutor is highly</p>

	<p>knowledgeable and experienced in the aquatics industry and holds learn-to-swim certification and adult teaching qualifications. The SNZ education team will support the Watermark training as demand increases and more teaching staff are required.</p> <p>New technologies are implemented to digitise administrative processes. The recruitment of an administrator will provide support for the academic team and an opportunity to develop efficient systems.</p> <p>The academic oversight of SNZ is variable and should be strengthened. The evaluation team suggests that stronger policy that aligns with practice would be beneficial, and ongoing review of quality assurance processes would ensure good educational practices.</p> <p>SNZ and Watermark are currently reviewing the contractual arrangement held with Rangitikei Enterprises and the previous owners. No training is currently being delivered via this arrangement.</p> <p>Watermark has identified improvements that are needed and sees opportunities to strengthen and grow the PTE.</p>
Conclusion:	A strategic and innovative management team supports the highly knowledgeable and experienced tutor to ensure educational goals are being met. Self-assessment of academic policies and practices is an area that has recently required strengthening.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>The sale of Watermark was finalised in July 2022. Key compliance accountabilities are now managed by the education commercial manager. There is limited knowledge of the compliance requirements of a PTE. Understanding NZQA rules and regulations and compliance requirements needs to be strengthened. The PTE is seeking advice on its compliance obligations and is tracking its compliance actions.</p> <p>Watermark is working effectively with regulatory bodies (i.e. New Zealand Standards Committee) to ensure practices are meeting swimming pool water quality standards.</p>

	<p>Most key compliance accountabilities have been managed well. The previous owners of the organisation submitted all annual attestations to NZQA in a timely manner. However, under the previous ownership, a non-compliance of late credit reporting was identified over the last four years. In 2021, 50 per cent of learner credits reported were over the 90-day requirement. The new management of Watermark has taken actions to rectify the problem and has put in place processes to better support credit reporting.</p> <p>Participation in external moderation activities with Connexis, Skills Active and Toi Mai have reported acceptable outcomes.</p> <p>Self-review against the Code of Practice will be undertaken in the coming months.</p>
<p>Conclusion:</p>	<p>Watermark is meeting most of its key compliance requirements, but needs to take a more systematic approach to ensuring that all compliance obligations are understood and met.</p>

Focus areas

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

2.1 Focus area: Monitoring Pool Water Quality (Level 3) Training Scheme

Performance:	Good
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 ICENZ Limited:

- Under the new ownership, the PTE needs to strengthen its understanding of NZQA rules and requirements to ensure it meets its obligations.
- Analyse learner enrolment, completions, withdrawals and non-completion data to identify trends and patterns across all courses to provide an overall understanding of educational performance and make improvements.
- Continue to develop the collection of stakeholder feedback data for self-assessment and to build organisation-wide capability in analysing and using this data.
- Continue to strengthen capability in teaching and assessment practice, monitoring internal and external moderation processes and results to ensure assessment outcomes are valid and good practices are being embedded.

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 ICENZ Limited to:

- Ensure credits for learners 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 1

Table 1. Student completions across all unit standards as per data supplied by ICENZ Ltd.

Learners	2018	2019	2020	2021
Māori	4	1	12	14
Pasifika	0	0	2	2
NZ European	18	18	60	86
Total learners	23	24	67	128
Total credits	322	231	624	774

Appendix 2

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 fraud⁵*
- *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.*

⁵ 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 2021, which are made by NZQA under section 452(1)(t) of the Education and Training Act 2020 and approved by the NZQA Board and the Minister of Education.

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 2021, the Consent to Assess Against Standards Rules 2021 and the Training Scheme Rules 2021 respectively.

In addition, the Private Training Establishment Registration Rules 2021 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration.

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 2021. 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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