

Royal Business College
Report to the Tertiary
Education Commission

Confidential

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1. Executive Summary

- 1.1. The Tertiary Education Commission (“TEC”) is currently carrying out a review of Tertiary Education Organisations (“TEOs”) to obtain comfort that the sector is compliant with TEC and the New Zealand Qualification Authority’s (“NZQA”) programme and funding approval requirements and that their high trust model is working in practice.
- 1.2. TEC has selected a sample of TEOs based on certain criteria, including existence of sub-contractors to deliver programmes, rapid growth in equivalent full time students (“EFTS”) and high number of course and qualification completion rates. Once the organisation is selected, a range of programmes across the TEO are chosen for review, including those programmes that fall under the selection criteria.
- 1.3. TEC has engaged Deloitte to undertake a focused review of two selected programmes at Royal Business College (“RBC”) to establish if the teaching delivery is in compliance with requirements of the Education Act 1989 and adheres to the delivery approved by NZQA in order to be funded by TEC. This specifically includes a review of the processes and practices and underlying documentation to investigate whether the programmes:
 - are taught in accordance with TEC’s funding and NZQA’s programme approval requirements;
 - comply with the teaching hours and weeks in the Programme Document (or RBC Programme Handbook) and entered into STEO; and
 - have evidence of sufficient underlying enrolment and assessment records.
- 1.4. RBC is a Tertiary Education Provider as defined in the Education Act 1989 and is a Private Training Establishment (“PTE”). RBC was funded by TEC for a Student Achievement Component (“SAC”) funding during 2014 of \$141,981 (excluding GST).
- 1.5. Based on our findings to date we are not recommending any further reviews.
- 1.6. We carried out the review during a time when RBC was moving office and had a number of other commitments. Therefore, we are appreciative that management at RBC were still highly cooperative during the process.
- 1.7. We have raised some improvement recommendations, which include:
 - Explicitly state the teaching and self-directed learning (“SDL”) hour split in the Programme Handbook for each programme and then ensure that STEO is updated to reflect this on a timely basis to reflect the hours and any future changes;
 - Include in the new RBC Course Programme Change Policy a definition of what constitutes a minor change, with specific examples (that only requires Academic Advisory Group approval), compared to a significant change that requires Academic

Advisory Group approval as well as NZQA approval. This should be in line with the "Type 1" and "Type 2" changes currently defined by NZQA;

- Have a clear trail through the Academic Advisory Group minutes of the discussions on changes in unit standards as evidence that they are taking place and the appropriate programme change process is being followed;
- Ensure that personnel at RBC consistently certify and document that they have sighted an original document in the enrolment process, such as a birth certificate or passport;
- There was no information or documentation in relation to the Level 5 programme held by NZQA. We recommend that NZQA ensure all their documentation is up to date so they have a record, including the R0482 at Level 5 and the Programme Handbooks at both Level 5 and Level 6; and
- Ensure RBC appropriately report the credits for all students, including those enrolled in the RBC Diploma in Computing (Level 6), given their Category 1 status. They should also enter the credit information for the previous Level 6 students who currently have no record of achievement.

2. Introduction

Background

- 2.1 RBC is a Tertiary Education Provider as defined in the Education Act and is a PTE. Under RBC's Investment Plan 2014 – 2015, RBC states that its mission is *"to exist for its students, teaching and guiding them towards meaningful, educated and balanced future lives in a 21st century international business environment."*
- 2.2 In the Confirmation of Investment Plan Funding letter dated 20 December 2013 to **9(2)(a)** (Director) from Dr Grant Klinkum (General Manager, Tertiary Investment), RBC was funded for SAC funding during 2014 of \$141,981 (excluding GST) from the TEC (Appendix A of the letter). The current value of funding per EFTS in the 2014 Investment Plan is \$9,200.78.
- 2.3 TEC has asked Deloitte to undertake a focused review of two selected programmes at RBC. Details of these programmes are in the table below:

Programme ¹	Date Programme Approved by the Academic Board ²	Level ²	Credits/Duration ²	EFTS in SDR Return 2014 ³	EFTS Actually Funded in 2014 Investment Plan	Sub-contractor ⁴
National Diploma in Computing (Level 5)	22 October 2003	5	120 credits 1 year	23	10	None
RBC Diploma in Computing (Level 6)	Originally approved on 18 August 2005, and amended from the "National Diploma" to become the "RBC Diploma" on 19 December 2011	6	122 credits 1 year	4	6	None

¹ Based on the Programme 2014 Handbooks provided to us by RBC

² Sourced from NZQA based on information from their system

³ Sourced from the return information submitted by RBC to TEC for funding purposes

⁴ Sourced from Discussions with TEC and RBC have confirmed that there are no subcontractor relationships for these programmes

Scope of this Report

- 2.4 TEC have engaged Deloitte to undertake a focused review of two selected programmes at RBC to establish if the teaching delivery adheres to that approved by the NZQA in order to be funded by TEC. This includes a review of the processes and practices and underlying documentation to investigate whether the programmes:
- are taught in accordance with TEC's funding and NZQA's programme approval requirements;
 - comply with the teaching hours and weeks in the Programme Handbook and entered into STEO; and
 - have evidence of sufficient underlying enrolment and assessment records.

Limitation of this Report

- 2.5 The terms of this engagement and the scope of the work you have asked us to undertake are different from an audit or a review engagement, and the assurances associated with these reviews are not given. Our work did not constitute an assurance engagement in accordance with the requirements of the Chartered Accountants Australia and New Zealand, and was not designed to provide assurance accordingly under International or New Zealand Standards on Auditing or Assurance such as ISAE 3000. Accordingly, no assurance opinion or conclusion has been provided.
- 2.6 The financial and other information contained in this report has been provided by RBC, TEC, NZQA and various RBC students. Our review was based on enquiries, analytical review procedures, interviews and the exercise of judgement. There is, therefore, an unavoidable risk that some material misstatements may remain undiscovered.

Key Sources of Information

Type	Details
Documents	<ul style="list-style-type: none"> Royal Business College National Diploma in Computing Level 5 Handbook 2011, 2012, 2013 and 2014 Royal Business College National Diploma in Computing Level 6 Handbook 2011 Royal Business College RBC Diploma in Computing Level 6 Handbook 2012, 2013 and 2014 Course Programme Change Policy Dataset submitted by RBC to TEC for funding purposes from 2011 – 2014. This was obtained from TEC Programme timetables provided by RBC Selection of Minutes of Academic Advisory Group Meetings provided by RBC
Staff RBC	<ul style="list-style-type: none"> 9(2)(a) of the OIA (Director) 9(2)(a) of the OIA (Chairman) 9(2)(a) of the OIA (Director) Sample of programme tutors
Other	<ul style="list-style-type: none"> A total of 14 students were interviewed across the two selected programmes Graeme Cahalane (Manager, Monitoring and Crown Ownership, TEC) s 9(2)(a) (Senior Advisor, Monitoring and Crown Ownership, TEC) 9(2)(a) (Senior Risk Case Analyst, Quality Assurance Division NZQA)

3. Compliance with NZQA Approval and TEC Funding Requirements

3.1 In this section we set out our findings on whether the programmes:

- are taught in accordance with TEC funding and NZQA's programme approval⁵ requirements; and
- comply with the teaching hours and weeks in the Programme Handbook and entered into STEO.

⁵We have discussed in section 3.19 that NZQA do not hold any information or documentation in relation to the Level 5 programme so we are not clear what NZQA have approved at this level.

Programme Alignment with Approval and Funding Requirements

3.2 We set out below the required hours under the Programme Handbook ("PH") and the hours submitted by RBC into STEO, the TEC database. We have carried out the following procedures:

- identified any differences between the PH hours and the hours submitted into STEO (red below);
- if we have identified a difference between the PH and STEO, we have then traced this change through to the discussion and approval in the Academic Advisory Group minutes; and
- obtained any PH that NZQA hold, as well as any approval of change documents. We compared these to the current PH at RBC to check whether there were any unapproved changes in the PH that were required to go through NZQA for approval.

Programme ¹	Date Programme Approved by the Academic Board ²	Programme 2014 Handbook ("PH") (RBC) Hours ¹	STEO (TEC) Hours ³
National Diploma in Computing (Level 5)	22 October 2003	Teaching: 1,050 Self-directed: 150 TOTAL HOURS:1,200	Teaching: 756 Self-directed: 420 TOTAL HOURS: 1,176
RBC Diploma in Computing (Level 6)	Originally approved on 18 August 2005, and amended from the "National Diploma" to become the "RBC Diploma" on 19 December 2011	Teaching: 1,000 Self-directed: 220 TOTAL HOURS:1,220	Teaching: 800 Self-directed: 400 TOTAL HOURS: 1200

¹Based on the Programme 2014 Handbooks provided to us by RBC

²Sourced from NZQA based on information from their system

³ Sourced from the return information submitted by RBC to TEC for funding purposes

Updating STEO

- 3.3 There was no issue or significant differences between the PH and STEO with the total learning hours for any of the programmes, which drives the credit and EFTS value, on which funding is based.
- 3.4 The split of hours in the Programme Handbook ("PH") between teaching and SDL are not explicitly stated. However, there was enough information provided to work out the hours indicated in the PH. For example, the PH mentions "10 hours of work (lectures + SDL) is expected per credit earned" which would equate to 1,200 hours for Level 5 (120 credits) and 1,220 hours for Level 6 (122 credits). It also sets out that there are 42 weeks of full-time study at Level 5, with 5 hours per day (9am - 12pm, and 12.30pm - 2.30pm class session), giving 1,050 teaching hours in total (5*5*42). At Level 6, the same daily hours are stated over a 40 week period, giving 1,000 teaching hours in total (5*5*40).
- 3.5 There is no specific mention of a figure for the SDL hours, however the PH describes the importance of SDL, the lab being open until 5pm for SDL and gives the total learning hours expected. We have calculated the SDL as the difference between the total learning hours and the calculated teaching hours. However, we have evidence from the tutor and student interviews that the actual SDL hours undertaken are likely to be higher than this figure.
- 3.6 From the above calculations, we have noted differences between the calculated PH teaching and SDL hours, compared to the hours submitted into STEO. However, the total learning hours are reasonably consistent. Further, the inconsistency arises from the PH teaching hours being greater than the hours submitted in STEO. We would be more concerned if the STEO teaching hours were higher than those set out in the PH.
- 3.7 We have raised a recommendation that RBC explicitly states the teaching and SDL hour split in the PH and then ensures that STEO is updated on a timely basis to reflect the hours and any future changes. This will ensure that TEC has access to accurate information in regard to the breakdown of learning hours being delivered.

Approval of Changes of Learning Hours

- 3.8 As previously mentioned, the split of hours in the Programme Handbook between teaching and SDL are not explicitly stated. However, there was enough information provided to work out the hours indicated in the PH and we calculated these ourselves.
- 3.9 The learning hour information in the PH between 2011- 2014 has remained reasonably consistent. There have been no changes at Level 5. We noted one change within the Level 6 Programme Handbook, where there was a reduction of 1 learning hour per day within the stated lecture times in 2012 and 2013, which was changed back to the original hours in 2014. This would have the effect of reducing the teaching hours in our calculation by 210 hours over the year.
- 3.10 We discussed this with 9(2)(a) of the OIA (Director) and this was likely to be an error. We note that if we adjusted for the difference, the Programme Handbook hours would still reasonably match the hours entered into STEO and the approved NZQA R0482 hours, therefore we do not see this as a significant issue.
- 3.11 The total learning hours, which the funding is based on reconciles back to STEO. However, given the split of hours is not explicitly stated, we cannot reconcile the separate components of the learning hours.
- 3.12 Therefore, we have recommended above that the PH is amended so the split of hours is explicitly stated and to ensure these reconcile to the STEO hours at TEC. This should be updated on a timely basis whenever a change in hours is made to a programme.

Approval of other Programme Changes

- 3.13 We have discussed the internal RBC process for programme changes with 9(2)(a) of the OIA (Director) and 9(2)(a) of the OIA (Chairman). Up until recently there has been no formal documented policy on programme change and RBC has relied on components of its Quality Management System ("QMS") to provide guidance to Management staff in relation to course programme changes. Under Section 2.4 of the QMS, one of the responsibilities of the Academic Advisory Group is to "...review each course annually and ...review standards and relevance of courses..." 9(2)(a) of the OIA clarified that discussions and decisions relating to course programme changes occurred within this context. Typically, course programme changes were initiated by NZQA. In these situations, management at RBC simply followed directives and implemented any changes as required. Where a local course developed by RBC was involved, if the proposed course programme change was sufficiently significant, NZQA would be notified and approval sought to deliver the revised course programme.
- 3.14 The Academic Advisory Group would generally be made aware of proposed or NZQA mandated course programme changes at its regular meetings, usually through the Director of Studies Report. Where appropriate, the approval of the Academic Advisory Group would be sought for a proposed change to a course programme.
- 3.15 RBC has recently developed a specific Course Programme Change Policy in order to have clearly defined processes and ensure Management are consistent and compliant in their approach when dealing with course programme change matters. We have been provided with

the draft policy and members of the Academic Advisory Group are currently reviewing the draft and their approval is anticipated.

- 3.16 We recommend including in the policy, a definition of what constitutes a minor change, including examples (that only requires Academic Advisory Group approval), compared to a significant change that requires to have Academic Advisory Group approval as well as NZQA approval. This should be in line with the “Type 1” and “Type 2” changes currently defined by NZQA.
- 3.17 From discussions with 9(2)(a) of the OIA (Director) and course tutors, changes to the programmes are generally NZQA mandated changes such as expiring or replacement unit standards. Through our review of the Programme Handbooks between the periods of 2011 – 2014, we have been able to trace through the changes in the unit standards over this time. There have been a large number of changes of unit standards over Level 5 and Level 6, as well as changes to credit values of the individual units at Level 5 over this period. We have sighted discussions of the programme changes through a sample of Academic Advisory Group meeting minutes provided by 9(2)(a) of the OIA. However, to date we have not been able to trace back discussions on changes on individual unit standards. 9(2)(a) of the OIA clarified that these discussions are sometimes high level and might not be recorded in the minutes, but do happen in practice. Therefore, we have raised an improvement recommendation to have a clear trail through the minutes of these discussions as evidence that they are taking place and the appropriate programme change process is being followed.
- 3.18 We also requested any documentation in relation to the programmes that was held by NZQA. The only information held by them was in relation to the Level 6 programme that included the R0482 Programme Details Documents, and correspondence and an approval letter for Category 2 Changes dated 19 December 2011 from NZQA in relation to replacement of unit standard 6855 with 26227 and the change of the programme title from “National Diploma” to “RBC Diploma” that was also provided to us by 9(2)(a) of the OIA (Director).
- 3.19 There was no information or documentation in relation to the Level 5 programme. We recommend that NZQA ensure all their documentation is up to date so they have a record, including the R0482 at Level 5 and the Programme Handbooks at both levels.

Delivery of Teaching Hours and Weeks

- 3.20 We have been advised by TEC that an important part of the funding provided to RBC is based on the total learning hours delivered to the student (1,200 per year for a full time course). We have focused on the teaching hours component of learning hours to give a percentage of delivery, given the stronger evidence base of timetables in conjunction with tutor interviews.
- 3.21 The average total teaching hours have been calculated in the table below. The components include the:
- average timetable hours obtained (the underlying timetables 2014 were available for each programme) and further interpreting these through tutor and student interviews; and
 - average additional hours and those hours over and above the underlying timetables over 2014 that we identified through interviews with tutors and students. They are calculated on a per student basis.

3.22 The SDL component differs between each student, depending on a number of factors such as age, prior knowledge, motivation and experience. However, it is an important part of the total learning hours that the funding is based on. The student interview findings (documented in the next section below), as well as the evidence of assessments gives us a level of comfort around the extent of these hours.

3.23 We set out below an estimate of the teaching hours delivered on this basis (from tutor interviews and timetables provided by RBC) and a comparison to the hours required to be delivered under STEO.

Programme	2014 Programme Handbook ("PH") (RBC) Teaching Hours	STEO (TEC) Teaching Hours	Calculated Teaching Hours Delivered	General Comments from Discussions with Tutors and Review of Timetables
National Diploma in Computing (Level 5)	1,050	756	1,019	<ul style="list-style-type: none"> High level of teaching hours given that there are 4.75 hours of lectures per day, 5 days a week, over a period of 42 weeks
RBC Diploma in Computing (Level 6)	1,000	800	820	<ul style="list-style-type: none"> High level of teaching hours given that there are 4.0 hours of lectures per day, 5 days a week, over a period of 40 weeks

3.24 We found that the teaching hours delivered under both programmes exceeded the delivery funded by TEC and approved by NZQA.

3.25 The teaching hours delivered under both programmes are slightly lower than the PH for both programmes. However, the teaching hours are not explicitly stated in the PH and we have manually calculated these based on implicit information. Also, the PH hours are higher than those recorded as approved by TEC demonstrating that RBC are delivering over and above what is required.

3.26 As a result we have not raised this as a significant issue, but as an improvement recommendation to ensure the breakdown of learning hours (teaching and SDL) in the PH are explicitly stated, and that this information matches the approved break down of learning hours in STEO and the NZQA R0482 Document.

3.27 We have allowed additional time for tutors helping, emailing and contacting students individually in relation to the courses. These additional hours are calculated on a per student basis, to estimate the number of hours an individual would spend learning as opposed to the number of hours a tutor would spend teaching all students. For example, if a tutor is in email contact with five students for half an hour each, we would assume half an hour learning as opposed to the two and half hours that the tutor is interacting with students. This is based on the latest New Zealand Qualifications Framework dated November 2013 that states "*the credit value relates to the amount of learning in the qualification. In determining the amount of learning in a qualification, a qualification developer estimates how long it would typically take a person to achieve the stated outcomes in the context specified and to demonstrate that achievement through assessment. This determines the credit value for a qualification.*" We note that the funding from TEC is also on a per student ("EFTS") basis. We have also previously verbally confirmed with NZQA that this is the right basis to use.

3.28 In terms of the SDL component, we have evidence of the SDL hours being met through the student interviews below, although the level is variable from student to student. A driver for this is likely to be their previous education, experience level and English speaking ability. We sighted evidence of assessment records for the majority of the students selected in our sample.

Student Interviews

3.29 We interviewed a sample of students in each programme to find out their perspective of the delivery of the programmes and the level of work (teaching and SDL) required. We have summarised the interviews below.

Programme	Number Interviewed	Number Tried	Duration	Teaching Modes and Classes	Self-Directed Learning	Assessments
National Diploma in Computing (Level 5)	10	33	8 months – 1 year	Daily lectures and self-directed learning	Range: 1-2 hours per day	Written exams and practical tests
RBC Diploma in Computing (Level 6)	4	16	9 – 10 months	Daily lectures and self-directed learning	Range: 1-3 hours per day	Written exams and practical tests

3.30 The student responses in relation to the teaching modes and classes generally matched the tutor comments for both National Diploma in Computing programme Level 5 and 6.

3.31 We had a particularly low success rate in contacting students in the National Diploma in Computing Level 6. We tried contacting all the students provided to us, however in the majority of cases the individual's numbers were not working or there was difficulty in communicating due to the English language barrier.

3.32 We were only provided with a list of 13 students out of 23 on the SDR at Level 5 during 2014, therefore did not have a complete listing for this period. The explanation provided by RBC was that only a portion (10 funded and an additional 5 unfunded) were actually approved for funding by TEC during this period.

3.33 The class schedule and teaching hours were generally the same for the National Diploma in Computing Level 5 and Level 6. The classes were held every day from morning until the afternoon between 9 am to 2:30 pm. Students interviewed for both programmes confirmed they are allowed to stay in the classroom after teaching hours to complete any SDL.

3.34 The majority of the students interviewed for both programmes were satisfied with the support received from the tutors and RBC.

3.35 However, we noted that 2 exceptions out of 10 students from the National Diploma in Computing Level 5 said that the programme curriculum was very basic and lacks practical exercises and assessments.

- 3.36 The majority of the students from both programmes confirmed their regular attendance to the classes.
- 3.37 We found that one student enrolled in the National Diploma in Computing Level 5 (2011) had stopped attending classes after the February 2011 earthquake in Christchurch which during that time were held in one of the tutor's home address. Another student enrolled in the National Diploma in Computing Level 6 (2013) was unable to complete the programme due to sudden relocation plans.
- 3.38 The majority of the students interviewed for both programme did not pay any tuition fees except for a \$200-\$300 registration fee. However, one student from National Diploma in Computing Level 5 (2011) claimed he was asked to apply for a student loan via Study Link amounting to about \$5,000. However due to financial constraints he was unable to pay off the loan as at the interview date.
- 3.39 One student from the National Diploma in Computing Level 5 (2012) claimed that classes were held with students from other courses. This was corroborated by another student we interviewed for the National Diploma in Computing Level 6 (2013) programme who claimed that joint classes were held for 6 -7 months duration. When we enquired further about this with tutors they stated that this was due to renovations and was over a shorter period of time. They added that although the students were in the same space they were taught on their respective courses separately.
- 3.40 There is evidence of SDL in both programmes, but the extent is variable. As previously explained, this differs between each student depending on a number of factors such as work commitments, prior knowledge, experience level, motivation and English speaking ability.
- 3.41 We expect variability in student responses given their needs are likely to differ significantly. Given this, there were no responses that were a significant cause of concern. We have obtained further comfort through evidence of assessment records of a sample of students below to demonstrate engagement in the programmes.

4. Verification of Existence of Students and Student Data

4.1 In this section we explain the results from randomly selecting 36 student samples from the SDR data, including 21 students from the National Diploma in Computing (Level 5), and 15 students from the RBC Diploma in Computing (Level 6). We have provided a table below of the number of EFTS in the SDR data from 2011 – 2014 and the number of sample selections:

Programme	Year	Total EFTS per SDR	Total Students (NSN's) in the SDR	Observation if Variance	Samples Selected
National Diploma in Computing – Level 5	2011	6	7	0.9 EFTS claimed per student instead of the standard 1.0 representing 1 year of full time study.	5
	2012	18	23	6 of the 23 students in the SDR with EFTS that summed to 0.1 instead of the standard 1.0 representing 1 year of full time study.	5
	2013	10	10		5
	2014	23 ¹	23 ¹		6
National Diploma in Computing – Level 6, known as RBC Diploma in Computing from 2012	2011	9	9		6
	2012	0	0		0 (no EFTS)
	2013	6	6		5
	2014	4	4		4

¹ We observed a difference between the numbers of students in the SDR of 23 compared to the total approved SAC funded students in the 2014 Investment Plan of 10. This represents an over delivery (i.e. more students are being taught than what is being funded).

4.2 For each sample we reviewed the underlying information. The following summarises the process involved to verify the existence of students and their eligibility to enter the programme:

- we sighted enrolment application forms for each student that included signed and dated hardcopy enrolment application forms. We also confirmed whether or not the forms had been appropriately approved by RBC;
- we sighted appropriate supporting information (e.g. birth certificate or passport) that had been provided by the student to support their application and to confirm their eligibility to enrol in the programme;
- we reviewed the student details in their enrolment application forms to see if they agreed with the details provided to TEC by RBC;
- for those students who had completed their qualification according to RBCs records, we reviewed evidence of attendance registers for each student and evidence of assessment records for the students; and
- we reviewed whether the completed qualification had been reported to NZQA.

We have set out the following summary table of our findings. These findings are expanded upon further below.

Student Enrolments and Supporting Information

Programme	Enrolments and Supporting Information	Details agree between RBC and TEC?	Evidence of ongoing assessment records?	Completions and standards sufficiently reported?
National Diploma in Computing – Level 5	✓ Minor issues identified	✓ No issues	✓ No issues	✓ No issues
National Diploma in Computing – Level 6, known as RBC Diploma in Computing from 2012	✓ Minor issues identified	✓ No issues	✓ No issues	✓ Minor issues identified

Enrolment Process

- 4.3 Overall, we were comfortable with the underlying student records from the 36 samples we selected. However, we have identified a number of minor issues below.
- 4.4 In each sample we were able to sight a scanned hard copy of the enrolment application form completed and signed by the applicant.
- 4.5 We noted that there is a provision in the enrolment application forms for the applications to be authorised by a RBC staff member upon receipt from the applicant. This part of the application form was generally not completed in practice.
- 4.6 We discussed this process with 9(2)(a) of the OIA (Director), who explained that the application forms are not approved upon submittal. The applicants are shortlisted based on entry and eligibility criteria. Candidates are ranked and this is sent to the Principal, as well as the Director of Study. The final approval by RBC actually occurs once an “Offer of Study” has been sent from the Principal to the student.
- 4.7 From 2012 we were provided with an offer of study in all cases (25 samples), with one exception. However, we were not able to obtain evidence of this for the 10 students selected in 2011. The explanation provided by RBC was that the Christchurch earthquakes had an extensive impact on RBC including significant damage to the premises, with a lot of the records in 2011 not able to be retrieved.
- 4.8 In all cases, except one due to the explanation of the 2011 Christchurch earthquakes, we were able to find appropriate supporting documentation to support the validity of the enrolment, for example a passport or birth certificate. We noted seven instances where the copy of the passport or birth certificate on file was not certified by anybody at RBC to state they had sighted the original documentation. Therefore, we recommend RBC ensure this process is carried out in future, in line with best practice.
- 4.9 We found in 11 cases that the enrolment form was signed by the student after the course commencement date. In four of these cases, the student signed the enrolment form between 2 – 5 months later than the course commencement date. In combination with the attendance records, this showed they also started the programmes this late. The explanation generally provided by RBC was that they assessed that the student was a capable and quick learner and the student was guided and supported to complete the course within the required timeframe, as well as given extra support. In some cases, we also understand that the student had a lot of experience or some prior learning that contributes toward the qualification.
- 4.10 For each sample, the enrolment data in the SDR submitted to TEC matched the underlying enrolment records in all cases.

Assessment Records

- 4.11 The NZQA “PTE enrolment and academic records rules” section 6.1 (a) and (d) state that *“accurate academic records that must be kept, and kept up to date, by PTE’s for students enrolled in education and training at a PTE are...records of individual student assessment and examination results that include the name of the student, the date of achievement and the relevant grade, which are to be kept as a permanent record”* and *“records of achievement of awards or qualifications by the students, which are to be kept as a permanent record.”*

Therefore, there is actually no requirement for RBC to keep the assessment records given its Category 1 status; however they still have been able to provide us with these records.

- 4.12 We carried out a high level review of the assessment records, including checking there was evidence of some assessment records present for each student in our samples and carrying out a high level review to check we were comfortable with the authenticity.
- 4.13 We note that we are not qualified to assess the quality of the learning in relation to the assessment process; therefore this is not covered as part of our review.
- 4.14 RBC was able to produce some evidence of assessment records for the majority of students in our samples selected. For the two exceptions, one student had failed the course and the other was enrolled in 2011 which was the time period affected by the Christchurch earthquakes. We were comfortable with the authenticity and validity from our high level review.

Attendance Records

- 4.15 The NZQA “PTE enrolment and academic records rules” section 6.1 (c) states that *“accurate academic records must be kept, and kept up to date, by PTE’s for students enrolled in education and training at a PTE are...records of student attendance, which are to be kept for at least the duration of the students enrolment.”* RBC has been able to provide us with these records from 2012.
- 4.16 From discussions with **9(2)(a) of the OIA** (Director), the process for recording attendance for both programmes, all student attendance is recorded by the RBC tutor on hardcopy attendance logs. Students are marked as either present (a tick), absent (A), approved leave (L), or explained absence (E). Attendance records are kept for all classes held daily, morning and afternoon (excluding public holidays). The tutor is required to sign the attendance log at the end of each week.
- 4.17 There were no attendance records for 2011. As mentioned above, from discussions with **9(2)(a) of the OIA** (Director) at RBC, a large amount of RBC documentation was lost due to the impact of the 2011 Canterbury earthquakes. We have clarified above that there is no requirement for these records to be kept anyway.
- 4.18 Of the 16 remaining students from 2012 – 2014 at Level 5:
- 6 students generally had consistent records of attendance with some explained absences;
 - 1 student recorded in 2012, but actually finished the programme at the beginning of 2012 and did most of the programme in 2011; attendance documentation was lost due to the impact of the 2011 Canterbury earthquakes;
 - 4 students had consistent attendance for at least half of the year, then inconsistent or no attendance for the rest of the year; and
 - 5 students had inconsistent or no attendance for the majority of the year, with 3 of these students starting the course 2 – 4 months late, and for the second half of the year had inconsistent or no attendance. 1 of these students failed the programme.

- 4.19 Of the 9 remaining students from 2012 – 2014 at Level 6:
- 6 students generally had consistent records of attendance with some explained absences; and
 - 3 students had consistent attendance for at least half of the year, then inconsistent or no attendance for the rest of the year.
- 4.20 Explanations given by the tutors at RBC for non-attendance was generally that these students had families that they needed to take care of, as well as other commitments for which they explained their absences to the tutors directly. There are also some more capable and experienced students that take study resources and tutors provide them support during their SDL.
- 4.21 Where we identified gaps in attendance above, we focused our review of assessments on these particular students to ensure the work was actually being completed over this period. We found that there was generally sufficient evidence of the assessments being carried out, and often the students would hand in a few of these at once within a short period of time.
- 4.22 Therefore, the programme work is still likely to be carried out in these students own time even though they are not necessarily attending class.

Reporting of Completions

- 4.23 RBC has reported high completion rates. In the 2015 – 2016 Investment Plan Review provided to us by TEC, the qualification completion rates over both Level 5 and Level 6 were 100%, 74%, 100% for 2011 – 2013 respectively. Course qualification completions rates were 94%, 100% and 100%.
- 4.24 For the samples we selected we sighted evidence at the date of the review, for example through sighting a certificate and/or academic record, that they completed the qualification.
- 4.25 At Level 5, for all 15 student samples selected between 2011 and 2013, we sighted evidence that they completed the qualification. Of the 6 student samples selected in 2014, we saw supporting evidence that 3 completed the qualification, 2 students had not yet finished, and 1 exception had failed the programme.
- 4.26 At Level 6 all 15 students selected in our samples had evidence they had completed the qualification.
- 4.27 In regard to reporting the completion information to TEC and NZQA, discussions with RBC identified that every two months (i.e. month ending February, April, June etc.) that course tutors are required to provide the RBC Director of Studies with academic record updates for each student displaying the number of units completed and the credits achieved.
- 4.28 Qualification and course completion data is required to be reported to TEC as part of the SDR. If a student was issued a certificate for passing the course we checked the qualification and that all courses were complete in the data. And if the student had not yet completed the course or failed, we checked that these items were not complete in the data.

- 4.29 All courses and qualifications had been correctly reported between 2011 and 2014 at the time of the review. For Level 5, all students in our sample during 2011 – 2013 had passed their certificate and had been correctly reported as complete in the data. In 2014 not all courses and qualifications had yet been reported at the time of the review, which is not unusual given some students will have not quite finished or had had their results processed. At Level 6 all courses and qualifications had been reported between 2011 and 2014, with one exception in 2011 where a student withdrew or did not complete the course and the completion results correctly reflected that.
- 4.30 The qualification completions and record of individual credit achievements are reported to NZQA by RBC for Level 5 only. RBC explained that given Level 6 is no longer a national level qualification there is no requirement for the individual credits to be reported.
- 4.31 We discussed this with NZQA, who directed us to their website on “Consent to assess against standards on the Directory of Assessment Standards Rules 2011” given RBC is a Category 1 provider. Section 10 states that “to maintain consent to assess against standards in respect of the entire consent or particular classifications or standards, holders of the consent (except relevant schools and ITOs) must...(b) accurately report credits for students within 3 months of assessment, unless NZQA has approved a different reporting timeframe for the holder of the consent.” NZQA clarified that based on this rule, RBC should be reporting credits for the Level 6 students.
- 4.32 We compared the unit standards required to be reported under the PH for each year to what had actually been reported in the NZQA records for Level 5 and Level 6. For Level 5, the credits over all the years had generally been reported well with only minor differences, with differences ranging from 0 – 12 credits per student. There were more differences identified in 2011 and one student exception in 2012, ranging from 11 – 66 credit differences per student, however, this is likely to have been due to the disruption caused by the Canterbury earthquakes.
- 4.33 For Level 6, 2011 was the final year of the qualification being a National Certificate and credits were generally reported well with differences ranging from 0 – 14 credits. From this point on, the credits have not been reported sufficiently as expected given the explanation provided by RBC.
- 4.34 Given the advice and rule we have received from NZQA in relation to reporting of credits, we recommend that RBC ensure they report the credits for all students given their Category 1 status. They should also enter the credit information for the previous Level 6 students who currently have no record of achievement for these credits at NZQA in place.

Level of Evidence Retained

- 4.35 Other than the issues identified in the table and expanded upon above, RBC were generally able to produce all documentation requested and required as part of this review with the exception of some items in 2011 due to the effect of the Canterbury earthquakes.
- 4.36 We have set out improvement recommendations throughout the report and in the Executive Summary. In our view there were no significant issues that would lead us to recommend any further review.

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