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Self-review guidelines

Interim domestic Code and International Code

Contents

Introduction

These guidelines are for education providers – schools and tertiary education organisations (TEOs) – who:

- enrol international students and/or domestic tertiary students, and/or
- are signatories to the Education (Pastoral Care of International Students) Code of Practice 2016 (the international Code), and/or
- have obligations under the Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice 2019 (the interim domestic Code).

These guidelines have been developed to support all TEOs and international Code signatory schools to undertake and document self-reviews of their performance against the required outcomes and processes in the international and interim domestic Codes.

The purpose of self-review

Self-review (also called self-assessment or internal evaluation) is examining an organisation's practices to identify strengths and weaknesses so the organisation can make actual, worthwhile improvements to their practice.

Self-review is a proven basis for effective quality assurance practice. It is the most powerful method for an education organisation to understand and improve its educational performance.

The importance of self-review has long been reflected in Aotearoa's education sector regulatory environment, and it is a core component of quality assurance policies and criteria across all types of education organisations.

It is also a specific requirement of both the international and interim domestic Codes that self-reviews of performance are undertaken and documented (see Clause 37 (1) of the international Code and Clause 32 (1) of the interim domestic Code).

Self-review in different types of education organisations

There is a wide range of information on organisational self-review in different education settings.

The links below have information about the key features, organisational benefits, and regulatory requirements for self-review in your type of education organisation:

Self-review in New Zealand universities

Self-assessment in institutes of technology, polytechnics, and private training establishments

Internal evaluation in schools

While the Codes do not apply to Early Childhood Education (ECE) providers, the Ministry of Education's self-review guidelines for the ECE sector are an excellent resource for understanding the core components of an effective self-review process, and NZQA has also drawn on this resource in its guidelines and tools to illustrate the process of self-review.

Self-review as a flexible, scalable, and fit-for-purpose process

Aotearoa's education sector is diverse. Education providers have different educational purposes, different types of learners, and different contexts.

The outcomes-based international and interim-domestic Codes support providers to take a tailored approach to their pastoral care practice in diverse educational settings. Self-review processes will also look different in each school or TEO.

Self-review in a diverse sector means that each school or TEO has the flexibility to decide how it undertakes its self-review of performance against the Code/s, and how to document that review.

Self-review is a flexible, scalable, fit-for-purpose process, and what it looks like in practice will depend on the size of the education organisation, the number of learners, and the overarching education purposes of the organisation.

There is no one-size-fits-all format for self-review. For example:

- an education organisation with a small number of learners that offers short courses or evening classes may run a smaller, simpler self-review process. Its data-gathering may be more qualitative, as it has fewer learners to consult and observe.
- an education organisation that runs more like a business aiming to please its student 'customers' may have quite different aims and expectations to an education organisation with thousands of students and a publicly-funded responsibility to produce graduates fit for employment in particular New Zealand industries. The self-review process of these two quite different entities will therefore also naturally look different.
- some education organisations will incorporate review of performance against the Code/s into wider organisational self-review processes and reporting; other organisations may decide that self-review of Code performance is more effective when it is a separate, specific process.

NZQA has no view on whether self-review against the Code should be a stand-alone or integrated process, only requires that the process takes place, is appropriately scaled, contains the four core components of effective self-review, and is documented.

How much self-review is enough to meet regulatory requirements?

The question of "what is enough self-review?" is one that each organisation needs to determine, based on its educational aims, for its unique learners, in its unique context.

Ultimately, self-review of performance against the Code/s is complete when an education organisation can effectively answer the key question "How well are we doing what we need to be doing?" (See *The core components of effective self-review* for more information.)

The core components of effective self-review

While there is no prescribed format for self-review or self-review reporting, and self-review will look different in different types of organisation, it is also not a case of 'anything goes.'

There are typically four core components that make up any effective self-review process. These can be expressed as:

1. **Prepare:** planning the process so you know what you are looking at, why, how, and when
2. **Gather:** collecting relevant information systematically from multiple, diverse sources
3. **Make sense:** looking closely at the information you have gathered to see what it tells you about your current practices
4. **Decide:** decision-making for ongoing improvement connected to the outcomes sought by your self-review.

When NZQA evaluates provider self-review, it looks to see if these core components are present.

More information about each core component can be found in sections 1-4 below.

The additional requirements for self-review of performance against the Code/s

Further to the core components of effective self-review, a self-review of performance against the Code/s will have two additional parts:

5. **Document:** reporting on your self-review process, findings, and action plan in a format that works for your organisation.
6. **Attest:** submitting an online form to NZQA to attest that the process of self-review of performance against the Code/s has taken place

More information about each core component can be found in sections 5-6 below.

How NZQA uses self-review reports to monitor performance

NZQA, as the Administrator for both the international and interim domestic Codes, is required to use an education provider's self-review report as a tool to monitor performance (see Clause 37 (2) (international Code) and Clause 32 (2) (interim domestic Code)).

NZQA may request providers' self-review reports as part of routine monitoring or when NZQA is concerned about a provider's compliance with the Code/s.

The report gives NZQA an indication of how well the provider is managing its processes of self-review and, therefore, its own performance under the Code/s.

NZQA checks the report carefully for whether a provider has self-review processes that contain the four core components of self-review (see *The core components of effective self-review*).

After looking at the provider's self-review processes, NZQA will follow up with the provider in a range of ways, i.e.:

- provide feedback on what, if anything, the provider needs to do to improve its self-review processes in the future
- request further information (for example, some of the evidence referenced in the report, or copies of certain policies and procedures)
- phone the provider to discuss and clarify the information provided in their report
- arrange to visit the provider to validate its compliance on-site.

While NZQA cannot confirm a provider's compliance with the Code/s through a self-review report, it is the initial way NZQA looks at a provider's practice to scope and shape further monitoring inquiry.

Good practice in self-review

Between 2017 and 2019 NZQA undertook consultation, capability-building, and monitoring focused on the understanding and practice of self-review and reporting in international Code signatory schools and TEOs.

NZQA found that effective self-review and reporting of performance against the international Code:

- covered all outcome areas of the international Code
- focused on both compliance and improvement purposes
- used a variety of methods to gather feedback from students and a range of stakeholders relevant to the key required processes and outcome areas
- used qualitative and quantitative data to discuss the effectiveness of processes and overall performance against each outcome
- outlined specific, time-bound action plans that addressed gaps identified in the review.

The factors that contribute to good practice in international Code self-review are:

- a whole-of-organisation approach to monitoring and reviewing compliance with the Code
- professional development to support understanding of Code requirements and self-review
- supportive leadership and stable international department staff
- planning and preparation to ensure that Code self-review is an ongoing, sustainable, and increasingly embedded activity.

1. Prepare: getting ready for self-review

The first component of an effective self-review process is preparing.

Preparing for self-review is about planning the process so you know what you are looking at, why, how, when, and with whom. It includes:

- ensuring you understand the Code/s outcomes and requirements
- being clear about the questions you need to answer
- identifying the information you need to source (to evidence your Code/s compliance)
- planning each stage of the review, ensuring all relevant people are involved, and determining what you will have at the end of it (i.e. a report, an action plan, etc.)

Knowing what to review by understanding the Code requirements

Before undertaking Code/s self-review, your organisation must understand how to interpret and apply the requirements of the Code/s.

Your organisation needs to be familiar with the international Code and/or the interim domestic Code, and the relevant guidelines to support each Code. See the international Code guidelines and/or the interim domestic Code implementation guidance.

NZQA's international Code self-review tool and interim domestic Code self-review toolkit contain key evaluative questions to help you identify the areas of practice you need to review, and to guide your assessment of performance against the prescribed processes and outcomes of the Code/s.

Knowing what to review by clarifying the questions you need to answer

Self-review of performance against the Code/s aims to answer the following key question:

How well are we doing what we need to be doing?

This key question can be broken down into four supplementary "how" questions:

- *How does our organisation comply with the Code?*
- *How well?*
- *How do we know?*
- *How will we improve?*

To answer these questions, an organisation needs to gather and use evidence to:

- check that it complies with the minimum required processes of each outcome
- assess how effectively it is implementing those processes
- evaluate its performance in meeting each overarching outcome
- use these findings to plan for and/or make improvements, if required.

The following tables illustrate how the key questions shape the entire self-review process (which is made up of the four core components):

Key question	Supplementary questions	Self-review activity
How well are we doing what we need to be doing?	*How do we comply?*	Check compliance with the required processes
	How well?	Assess how well the processes are working
		Evaluate overall performance in each outcome area
	How do we know?	Use evidence to support judgements
	How will we improve?	Use findings to plan for, make, and monitor improvements

Prepare	Gather	Make sense	Decide
Be clear about the questions you need to answer	Gather information to answer your questions	Answer the questions	Use your answers to the questions to plan for ongoing improvement

Identifying the information you need to source

Once you know what you need to review, you can identify the information you need to gather to ensure that you have a sound evidence base from which to answer your key questions.

Good quality information is gathered systematically from multiple, diverse sources within and connected to your organisation. It is directly relevant to the questions your organisation is trying to answer and is qualitative and quantitative.

NZQA's international Code self-review tool and interim domestic Code self-review toolkit contain examples of possible evidence for each outcome area. The tools also include suggested evaluative questions to help you plan to gather relevant evidence for each outcome and key required process.

Planning your self-review process

It is important to plan each stage of your review process to ensure all relevant people are involved, and to determine how you will produce what you need to have produced by the end of it (i.e. a report, an action plan, etc.).

This section provides several prompts to help you plan your self-review process.

Make self-review part of everyday practice

Organisational self-review of performance against the Code/s requires:

- adequate resourcing (e.g. number of staff and their capability), planning and implementation of ongoing processes
- the systematic gathering, analysis, and reporting of good quality evidence
- identifying organisational strengths and weaknesses
- linking findings to plans for actual, worthwhile improvements.

Consider how you can weave effective self-review processes into your everyday practice.

The first self-review

The first time your organisation does a self-review it may be a large job and take some time. The amount of time and work required will depend on:

- your school or TEO's particular context
- number of staff and their capability
- how embedded self-review processes already are within your organisation.

NZQA expects that the process of self-review of performance against the Code/s will become shorter and easier once your organisation has the required systems, processes, and capability.

Tips for establishing an ongoing process of self-review

Make self-review processes ongoing, paired with everyday reflective practice.

Begin the process of self-review well in advance of the attestation due date. This avoids the situation where one staff member must complete the task alone a couple of weeks before attestation is due.

Collect and organise data on an ongoing basis.

Spread the review of different outcome areas of the Code/s across the calendar year and all relevant staff.

Some applied examples

For example:

- Record and file notes and follow-up actions from meetings with students
- Log ad hoc student or parent feedback according to the relevant Code outcome
- For international Code, Outcome 5: Orientation, review and report on orientation as soon as it takes place, involving all relevant staff and some new students.

Get guidance and advice from other professionals

For more guidance on planning and integrating self-review into your everyday practice, try approaching colleagues at other similar organisations. You can also seek advice from peak body representatives or other sector-based associations for professional development.

The most useful guidance will come from professionals working in a context similar to your own.

What if I have no international students enrolled?

To maintain approved international Code signatory status, an organisation must complete and document a self-review against the international Code and attest to it annually. This requirement applies even if you have no international students enrolled within the period of the self-review.

Signatories who no longer intend to enrol international students may choose to withdraw as an international Code signatory.

How do I review my international Code practice when no international students are enrolled?

If an organisation has no international students enrolled during the period of the review, its self-review process and report will be different.

In this situation, self-review is not a review of performance, but a review of documented policies and procedures. The self-review can look at how up to date your policies are, and how prepared your organisation is for any international student enrolling in the future.

At each process and outcome, your organisation needs to work through the first part of the self-review process. Consider the first supplementary question "How do we comply?" Does your organisation have the expected policies and procedures in place to enrol an international student? Does it understand its obligations? Is it ready to implement the required processes?

The self-review process can be used to identify any gaps in your preparedness and to plan for improvements.

2. Gather: collecting information to support your self-review

"Gather" is the second core component of effective self-review.

Seeking multiple, diverse perspectives on your organisation's performance in relation to Code outcomes and requirements is vital to an effective self-review process.

Gather information systematically from a range of sources to ensure that you have a sound evidence base from which to make judgements about your practice.

Good quality evidence is information that is directly relevant to the questions you are trying to answer. (See the *Making sense* section for an overview of the key evaluative questions.)

Refer to the optional international Code self-review tool and the optional interim domestic Code self-review toolkit (Tools A and B) for the areas of practice you need to review, suggested questions to shape your information-gathering, and examples of what types of information could be used as possible evidence.

Information should be gathered quantitatively and qualitatively.

3. Make sense: analysing information to make judgements about compliance and performance

"Make sense" is the third core component of effective self-review.

It involves looking closely at the information you have gathered to see what it tells you about your current practices in relation to the Code requirements and outcomes sought for your students.

This is where you answer the key questions:

Key question	Supplementary questions	"Make sense" review activity
How well are we doing what we need to be doing?	How do we comply?	Check compliance with the required processes
	How well?	Assess how well the processes are working
		Evaluate overall performance in each outcome area
	How do we know?	Use evidence to support judgements
	How will we improve?	Use findings to identify possible improvements

Checking compliance with required processes

The first part of "making sense" typically involves a kind of audit to identify any gaps in your compliance (and your evidence of compliance) with prescribed Code processes: in other words, answering the questions *"How do we comply?"* and *"How do we know?"*

Optional tools to guide you in this process include (for interim domestic Code) *Tool A: gaps analysis* (IDC) in the interim domestic Code self-review toolkit and (for international Code) the international Code self-review tool.

See the *Examples* section below for an example of how to check compliance against a prescriptive Code clause.

Assessing effectiveness of processes and evaluating performance against outcomes

The next part of "making sense" involves considering the effectiveness of non-prescriptive processes in light of overarching outcomes: in other words, answering the questions *"How well?"* and *"How do we know?"*.

This is more complex than auditing compliance with specific requirements in that it requires you to make an evaluative judgement about the effectiveness of a process based on available evidence, and to consider whether broader outcomes for student pastoral care are being met.

Identify which aspects of your practice are positively impacting on students' pastoral care outcomes, which aspects need improving, and what evidence makes you think that this is so.

Consider also the effectiveness of your self-review process: where do you have strong evidence of your compliance and performance, and where are there gaps? What new information might you need to seek or utilise in your future self-review?

Optional tools to guide you in this process include (for interim domestic Code) (Tool B: key evaluative questions (IDC) in the interim domestic Code self-review toolkit and (for international Code) the international Code self-review tool.

See the *Examples* section below for applied examples.

Examples of self-review against different parts of the Code/s

Self-review of compliance with a specific Code requirement

For example, take Clause 14 (b) from the international Code, which states:

"*Each signatory must enter into written contracts with each of its agents.*"

To comply with this clause, it is clear what international Code signatory providers need to do: develop and keep an agent agreement, signed by the signatory and each of its agents.

A self-review of this clause would:

- check that there is a current written contract on file for each of the signatory's agents
- note in the self-review report if the signatory has complied with this requirement
- indicate the available evidence to support this assessment (i.e. the written contract for each agent which is on file)
- (if the provider has not complied with the requirement) outline planned and/or actioned improvements to ensure compliance now and in the future.

Many of the required processes in the international Code and (in particular) the interim domestic Code are non-prescriptive. In other words, the Code/s say you must do 'something', but do not prescribe exactly what that something is.

When the Code/s make such a non-prescriptive requirement, each provider needs to consider the intent of the overarching outcome. Providers then have the flexibility to develop a tailored response to meeting the requirement.

For example, Clause 25 (1) (a) of the international Code is a non-prescriptive process requirement under *Outcome 6: safety and wellbeing*. It states:

"*Each signatory must ensure that appropriate measures are put in place to address the needs and issues of international students at risk or with special needs*".

Here, a provider must determine what measures are "appropriate". The provider needs to consider its context, and the particular needs, issues, and desired outcomes of its students. The precise approach (i.e. what the exact "measures" are) is up to each provider to decide. However, the provider's decisions about what is "appropriate" and what is not must be defensible and evidence based. An outsider should be able to examine the same evidence and reach a similar conclusion.

This evaluative, evidence-based approach should give a provider confidence in its decision-making.

A review of this clause, aligned to the intent of the overarching outcome, would:

- consider the profile of any learners at risk or with special needs (e.g. the student's age, ethnicity, English language ability, level of need for first language support, length of enrolment period to date, communication with parents, desired educational outcomes, history of risk or special needs, information previously given, temperament, existing support network, etc.)
- determine what measures would address the needs and issues of these learners and who will implement them (e.g. first language support, counselling, extra tutoring, communication with parents/homestay carer, medical assessment, medication, hospitalisation, deferral, extension, change of programme, mentoring, student buddy, adapted educational programmes/learning environments/materials/equipment)
- assess whether the measures implemented during the review period have been appropriate (i.e. identify, gather, and analyse evidence, which could come from information about students' wellbeing, academic progress and achievement, integration, student/parent/residential caregiver/agent feedback, medical reports or confirmation letters, meeting notes, emails, academic and welfare monitoring notes)
- use findings to plan for and/or make improvements (e.g. findings may suggest the organisation needs to communicate with parents and homestay carers earlier, routinely take notes at student welfare monitoring meetings, seek professional medical advice, identify more options for counselling support in the student's first language).

Self-review of performance against an outcome statement

For example, *Outcome 1: marketing and promotion* of the international Code states:

"*Signatories must ensure that the marketing and promotion to prospective international students of services provided by signatories includes clear, sufficient, and accurate information enabling those students to make informed choices about the services provided.*"

An effective self-review of this outcome would include:

- checking your compliance with the specified and non-specified process requirements listed in clause 12 *(i.e. "Did we develop and provide information to international students and keep it up-to-date?"*
- examining gathered information to consider performance against the outcome itself (i.e. "Did we develop and provide information that was "clear, sufficient, and accurate"? "What evidence tells us that this was so?")
- using your findings to plan for and/or make improvements.

4. Decide: use findings to plan for improvement

"Decide" is the fourth core component of effective self-review.

This stage involves prioritising and planning. This is where you consider what action you should take as a result of what you have learned about your pastoral care practices (including your current self-review processes).

Use the answers to your key questions (i.e. your findings) to develop an action plan for protecting and enhancing existing organisational strengths and addressing any identified gaps. Decide on the priority actions, work out how to implement them, who will implement them, how you will monitor their implementation, and, most importantly, how you will know that the actions have had the anticipated impact.

5. Document: report on your process, findings, and plan

Once you have covered the four core components of self-review, self-review of performance against the Code/s has two additional steps.

The fifth step is documenting your review process, findings, and resulting action plan/s.

Each provider can decide how it documents its self-review of performance against the Code/s. NZQA interprets the term "self-review report" in the broadest sense and has no view on the format in which self-review information is presented.

Optional tools to support your documentation and reporting of self-review can be found in NZQA's interim domestic Code self-review toolkit, and the international Code self-review tool also provides a working document in which to record your self-review findings and discussions.

You may prefer to use a tool or template developed by peak bodies, private companies or organisations in your sub-sector.

Choose a format that works for your organisation.

What do I need to document?

Your eventual self-review report needs to cover the four core components of self-review and answer the key questions (see *The Core Components of Effective Self-review*).

When choosing an approach or resource to guide your self-review process and reporting, check if it enables you to cover these core components.

What is NZQA really after in a self-review report?

Self-review is about measuring the overall effectiveness of what your organisation does to ensure quality pastoral care outcomes for its students. The self-review report needs to reflect what you learned about your Code practices and what evidence you have of their effectiveness.

NZQA expects that a Code self-review report will present summary-level findings and take an outcomes-based (as opposed to a clause-by-clause) approach. The report needs to be comprehensive, i.e. address all outcome areas of the Code.

Your self-review report might cover:

- Methods of information gathering and analysis
- Findings and conclusions
- Recommendations and action plans
- Any limitations of the review process you have just gone through.

6. Attest: confirm your self-review to NZQA

The last step in the process of Code/s self-review is attestation, which involves submitting an online declaration to NZQA by a due date to attest that the process of self-review of performance against the Code/s is taking place in your organisation.

The attestation is part of NZQA's external monitoring of compliance with the Codes.

NZQA advises providers per email of the attestation due date and the process for submitting the attestation. The due date, form, and processes change, so please check the email, the NZQA website or contact the Codes of Pastoral Care team on 0800 697 296 or code.enquiries@nzqa.govt.nz for the latest information.

The difference between self-review, the self-review report, and attestation

It is important to distinguish between your organisation's ongoing processes for self-review of performance against the Codes, your self-review report, and your attestation to NZQA that Code self-review is taking place.

What is self-review?

The international and/or interim domestic Code self-review process, like any internal evaluation process, is not something done every few years in preparation for an external agency's review, or even once a year for attestation purposes. Self-review is *ongoing*. It consists of the everyday information that an organisation gathers to do its business well, rather than extra information gathered to report to an external quality assurance agency.

NZQA expects that any competent education organisation will be engaged in continuous processes of self-review. Ongoing organisational self-assessment is a core component of NZQA's approach to quality assurance and is included in policies and criteria across all types of education organisations.

What is a self-review report?

In relation to the Code/s, a self-review report is documentation of some format that presents summary-level, evaluative, evidence-based information in relation to the self-review process undertaken, the findings, and the resulting action plans.

NZQA interprets the term "self-review report" in the broadest sense and has no view on the format in which self-review information is presented.

What is attestation?

Attestation is a declaration made to NZQA that self-review of performance against the Code/s is taking place. The attestation is made by submitting an online attestation form signed by or authorised by the CEO/Principal/Chair of the Governing Board.

NZQA expects that on request an international Code signatory school or TEO can provide documentation to support that attestation. In the Codes, this documentation is referred to as a "self-review report". It is important not to confuse the two documents: the attestation (which all signatories must submit when requested to NZQA) and the self-review report (which some selected signatories will be asked to submit following annual attestation).

7. Aim to be a high-performing organisation

The self-review process aims to give providers confidence in their ability to manage their own performance. An organisation that embeds self-review knows its strengths and weaknesses, what is working and what is not, and what it is doing about it and when.

A high-performing organisation engages in ongoing reflective practice, listening and responding to its students and other stakeholders, and continually reviewing its performance with an eye for improvement and progress.

It is an organisation that can be trusted – by its students, their whānau, their communities, and the Government – to manage its own performance.