

September 2016

EXTERNAL QUALITY ASSURANCE OF ENGLISH FOREIGN LANGUAGE PROVISION IN PRIVATE TRAINING ESTABLISHMENTS

A. Background

1. In December 2012, after consultation with English New Zealand (EngNZ), the New Zealand Qualifications Authority (NZQA) drew up sector-specific guidelines for the evaluative quality assurance of providers in the English as a Foreign Language (EFL) sector. These guidelines aimed to:
 - a. Strengthen mutual understanding between NZQA and the EFL sector
 - b. Reflect the distinctive features of the EFL sector, and how performance in that sector could be most reasonably evaluated
 - c. Build on the foundational principles of evaluative quality assurance
2. Since then, NZQA and EngNZ have periodically reviewed the effectiveness of these guidelines in the light of collective experience, and changes within the EFL sector. This document reflects the most current understanding between the two parties.

B. The approach to quality assurance of EFL provision

3. The variations from the standard NZQA implementation of evaluative quality assurance are as follows:
 - a. Enhanced explanation of the use of the current NZQA outcome indicators in EFL schools
 - b. Guidance on organisational benchmarking and self-assessment for the EFL sector
 - c. Enhanced explanation of what constitutes reasonable expectations for assessment practice in English language
 - d. The significance of the *English New Zealand Standards*¹ for self-assessment and EER
 - e. The relationship between NZQA evaluators and English NZ auditors

C. The use of NZQA outcome indicators in English as a Foreign Language schools

4. It is a foundational assumption of NZQA's evaluative quality assurance framework that each TEO contributes to outcomes for all its learners, but that the nature of these outcomes will vary according to the TEO, the sector it operates in, and the needs of its learners
5. In general, TEOs are expected to know what these outcomes are, how they are recognised (i.e. the evidence that they occur) and how their understanding informs their self-assessment in order to maintain or improve organisational quality.
6. The current NZQA outcome indicators² are:

¹ All references to the *English New Standards* are to version 14

² The full document 'Tertiary Evaluation Indicators' NZQA, August 2010 is available at <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/tertiary-evaluation-indicators/>. Revision of these Indicators is an ongoing cooperative exercise between NZQA and its key stakeholders, including ENZ. It is therefore assumed throughout that any changes to the current set of Indicators will therefore involve consultation with ENZ (amongst others).

- Graduates gain employment, engage with further study and/or contribute positively to their local and wider communities.

- Learners complete courses and gain qualifications.
- Learners acquire useful/meaningful skills and knowledge and develop their cognitive abilities (including learning to learn and self-management).
- Learners improve their well-being and enhance their abilities and attributes.

- Knowledge is created and disseminated.

- Community/iwi development is supported.

7. In general it is accepted by NZQA and EngNZ that the three indicators outlined above are those most relevant for EFL schools. This does not exclude the application of the other three outcome indicators above; they may be relevant depending on the context and nature of provision of the tertiary education organisation. It is recognized that EFL students seldom gain qualifications delivered by the provider.

8. NZQA will want to know what the language school identifies for itself as relevant outcomes, why they are relevant, how the school knows these outcomes are occurring, and what it does to maintain or improve those outcomes.

9. Depending on the particular circumstances, NZQA believes it is reasonable to include employment and graduate outcomes for a PTE offering vocational training as well as language courses.

10. For 'pure' EFL schools, such outcomes may or may not be relevant depending on such factors as:

- the language level of the student;
- whether or not EFL school students are only involved in short courses of 8 - 12 weeks or less; or
- whether some or many students may be enrolled for longer periods because they have a long-term educational / career pathway in mind, and the EFL school's support of that pathway is essential to a positive outcome.

11. NZQA recognises that the evidence of outcomes for students enrolled for short-term courses may be more limited than that for students in longer-term courses. Evidence of language gain, for example, for a student studying for fewer than four weeks only may be limited and even potentially misleading. None the less, NZQA believes that the school should be able to provide plausible evidence of some indicators of success for its short-term students.³

12. EER endeavours to give TEOs a reasonable opportunity to explain, during the process, what is relevant to them, and what is not. NZQA will not hold EFL schools accountable for outcomes they cannot reasonably be expected to know they have contributed to.

D. Organisational benchmarking and self-assessment

13. NZQA will not 'benchmark' any TEO's educational performance in an unrealistic way. The expectation is that TEOs themselves will be able to interpret their educational performance, and the evidence of it, in a way that makes sense in the specific context. This includes analysis of why the results represent (or do not represent) good performance.

³ The "outcome" for a short-term enrolment may include the fact of satisfactory course completion but should involve at least adequate initial entry assessment of individual student needs and wants, as well as progress and final assessments on completion of the course

14. There are three broad ways in which any TEO can validate its interpretation of evidence of educational performance:
 - a. by comparison with TEOs of similar type and similar context, where that comparison is valid and educationally useful;
 - b. by monitoring the progress and achievement of students against formally established internal reference points or expectations (internal benchmarks), where that approach is valid and educationally useful;
 - c. by monitoring student progress and achievement through diagnostic assessments and assessments used to monitor student progress in language acquisition, where that approach is valid and educationally useful.
15. NZQA will be interested in any of these methods, or others, used by particular schools, in the context of what the school does to understand and improve its performance. NZQA will not have a pre-determined expectation in this regard.

E. Learner assessment in English language schools

16. EngNZ members have a clearly specified expectation of performance articulated in the audit standards for curriculum and assessment. In particular, the assessment standard clarifies reasonable expectations by way of assessment practice in EngNZ member schools.
17. The EngNZ standard on assessment emphasises assessment for placement (diagnostic), progress assessment and final (summative) assessment of achievement. This is compatible with NZQA's expectations in all EFL schools.
18. NZQA does not intend to hold any EFL school unreasonably accountable for a particular assessment practice; nor does it have a fixed expectation of what constitutes effective assessment practice beyond those published in the tertiary evaluation indicators.
19. NZQA agrees that good practice in assessment of English language is mainly for three purposes:
 - a. Monitoring student progress
 - b. Diagnosing strengths and weaknesses in language development
 - c. Reporting student progress and achievement.
20. NZQA and EngNZ agree that there is no accepted single process or tool for assessing progress in language acquisition. Most providers have either developed their own methods for their own purposes or customised pre-existing assessment tools. These will be judged acceptable where there is reasonable evidence to confirm that the assessments are valid and reliable and, in particular, that the assessment results are used constructively to inform further learning
21. NZQA accepts that TEOs sometimes make claims on EFL learner achievement that, in the light of current international research on language acquisition, are implausible. NZQA and EngNZ agree that the best means to test the validity of such claims is to rely on the expertise of an independent subject expert, who will critically test the evidence presented by the TEO

F. The relevance of the English New Zealand Standards to EER

22. For all TEOs, NZQA affirms the principle that a well-run organisation is based on robust, ongoing and transparent self-assessment.⁴ In theory, an EER of a high-performing TEO should act as a third-party validation of the findings produced by that TEO's self-assessment.
23. In addition, NZQA supports efforts by any educational sub-sector to run an internal quality assurance and monitoring system that applies to all member schools. NZQA notes that the *English New Zealand Standards*⁵ represent the framework for such a system within EngNZ, and that its application generates high quality information
24. NZQA recognises the importance of having the currency of these standards regularly tested through a dual process of periodic audit and spot checks. For every EER of an EngNZ school the most recent audit report will be considered a significant and relevant source of information.⁶ NZQA will further recognise a successful spot check subsequent to the most recent audit as relevant evidence
25. NZQA has recently implemented changes to its EER Rules and policies, which include the introduction of a new key Evaluation Question (KEQ) on compliance. EERs will henceforth proceed from the premise that the new KEQ, as well as other relevant (i.e. compliance-centred) aspects of the other KEQs, may be answered in part from the most recent EngNZ audit report. NZQA will work with EngNZ to develop a list of relevant "matching" components between the standard EER plan of inquiry for EFL schools and the EngNZ audit report.⁷
26. At the same time, NZQA reiterates its belief that an EngNZ school's overall performance, as assessed by reference to the EngNZ standards represents a component only of the ongoing self-assessment expected of any TEO engaged in EER.
27. In order to maximise the potential value of any EngNZ audit report, each EngNZ schools needs to demonstrate how its report has been used to understand the current needs and wants of its learners, and to drive internal improvements.
28. Without predetermining how any EngNZ school might wish to carry out and represent its self-assessment, NZQA therefore acknowledges that the EngNZ standards provide assurance on several details of input and process, as they apply to the EFL sector.
29. At the same time, NZQA is open to receiving from an EngNZ school engaged in an EER any other types of information (i.e. in addition to the audit report) which that school considers relevant to explaining how its own self-assessment works for the benefit of its learners
30. If an ENZ member school can, through its self-assessment, of which the most recent EngNZ audit report is one essential component, convincingly demonstrate to NZQA that it knows the quality of its own performance to a comprehensive degree, then the overall length of time spent by NZQA in validating that self-assessment through EER will be reduced, with a consequent lessening in costs.

G. NZQA evaluators and EngNZ auditors

31. There are many points of common interest between the NZQA EER process and the EngNZ audit process in terms of understanding, maintaining and improving quality in EFL providers.

⁴ The key features of TEO self-assessment are summarised on the NZQA website: <http://www.nzqa.govt.nz/providers-partners/self-assessment/what-is-self-assessment>

⁵ See Appendix

⁶ Where NZQA holds no evidence to the contrary, NZQA will use the most recent ENZ report as a significant and relevant input into the EER process.

⁷ Relevant standards include (but are not limited to) those relating to curriculum, assessment, student support and staffing, each of which has the potential to "cover off" NZQA compliance requirements.

32. It is agreed that involvement of NZQA evaluators and EngNZ auditors in a selection of each other's training activities is sensible, desirable and useful.
33. It is also agreed that, as a necessary step in gaining joint assurance about the quality and consistency of EERs in the EFL sector, that EngNZ auditors will participate as credentialed observers for an agreed annual sample of EERs of EngNZ schools. One output of this exercise will be a report, prepared by the observers and shared between both parties, on the apparent effectiveness of the observed EERs in implementing the articles of this agreement.
34. NZQA also affirms its commitment to include within every EER team assigned to an EFL provider at least one evaluator who has significant knowledge of and experience in the EFL sector, as well as of the theory and practice of language acquisition.