



Agribusiness Training
Limited
Report to the Tertiary
Education Commission

Confidential

01 May 2015

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1. Executive Summary

Background

- 1.1. The Tertiary Education Commission (“TEC”) is currently carrying out a review of Tertiary Education Organisations (“TEOs”) to ensure that the sector is complying with the New Zealand Qualification Authority (“NZQA”) and TEC’s programme and funding approval conditions, and that its high trust model is working in practice.
- 1.2. TEC selected a sample of TEOs based on certain criteria, including:
 - a) existence of sub-contractors to deliver programmes;
 - b) rapid growth in equivalent full time students (“EFTS”); and
 - c) high numbers of course and qualification completion rates.
- 1.3. Once an organisation is selected, a range of programmes across the TEO are chosen for review, including those programmes that meet the selection criteria.
- 1.4. TEC initially engaged Deloitte to undertake a focused review of five selected programmes at Agribusiness Training Limited (“Agribusiness” or “ABT”). Following this initial review, TEC added a sixth qualification to the scope and extended the review of all programmes to encompass the past six years back to 2009.
- 1.5. We were advised by TEC that an important part of the funding provided is based on the total learning hours delivered to the student. The learning hours are broken down into teaching and self-directed learning hours at each level, as outlined in the NZQA Programme Approval Letters for each respective programme. We have focused on the teaching hour aspect given the stronger evidence base of timetables in conjunction with tutor and student interviews. However, we have also included findings in respect of self-directed learning hours through a sample of student and tutor interviews for each programme.
- 1.6. In summary, this review specifically includes understanding the processes and practices at ABT, as well as underlying documentation to investigate whether the programmes:
 - a) Are taught in accordance with NZQA’s approval and TEC’s funding requirements;
 - b) Comply with the teaching hours and weeks in the NZQA Programme Approval Letters and entered into STEO;
 - c) Have evidence of sufficient underlying enrolment and assessment records; and
 - d) Have any subcontracting relationships in place and, if so, understand the relationship and any oversight of these subcontractor activities provided by ABT.

- 1.7. ABT is a Private Training Establishment (“PTE”) as defined in the Education Act 1989. It provides training to students involved in many land based industries in New Zealand such as agriculture, horticulture, equine and apiculture. Given the rural industry based focus, there is often a large practical component to the programmes as well as theoretical, which may involve work experience. Courses are generally staged in alignment with seasonality because of the practical aspects delivered.
- 1.8. ABT has been funded by TEC for Student Achievement Component (“SAC”) funding for many years. During the six years 2009 to 2014, the total SAC funding received by ABT was \$16,852,236.25 (excluding GST)¹.
- 1.9. Throughout our review, Agribusiness management and staff were open, cooperative, and provided us with access to documentation as and when requested.

Issues identified

Delivery of teaching hours

- 1.10. Our most significant finding is an apparent under delivery of teaching hours across the six programmes that we have been asked to investigate. Our work to date has highlighted that this apparent under delivery has occurred since at least 2009 and continued through to the 2014 calendar year.
- 1.11. ABT disputes these findings and has set out their position in documents we have attached at **Appendix 1** and **Appendix 2**. Their argument is based on the inclusion of significant additional hours for tutor support and on the fact that they believe certain aspects of the work conducted by students outside of the classroom should also be included in the definition of “teaching hours”. They are also of the view that total learning hours should be considered, rather than a focus on the teaching hours component. We maintain that we have considered total learning hours, however this has been broken down to teaching and self-directed learning.
- 1.12. The table below summarises both our assessed position and ABT’s view for each of the courses under investigation. It should be noted that our figures are based on what we consider is the maximum teaching hours that have been delivered and it also includes an allowance for additional student contact time with their tutors.

Course	Percentage of teaching hours delivered per Deloitte	Percentage of teaching hours delivered per ABT
Certificate in Horticulture Industry Practice PC9748	25%	101%
National Certificate in Horticulture L3 NC1471	57%	183%
National Certificate in Horticulture L4 NC1014	68%	138%
Certificate in Land Based Skills PC9667	35%	125%
National Certificate in Apiculture NC1069	82%	132%
New Zealand Certificate in Apiculture NZ2223	57%	139%

¹ Based on figures provided from the TEC database.

1.13. We do not accept the position of ABT for the following reasons:

- a) ABT has included significant additional hours for tutor support, based on ABT's own estimate of the total additional time spent by tutors assisting students. It is not calculated on the basis of additional time *per student*. In addition to this, it is not supported by any documentary evidence; rather it is based on discussions held by ABT with its tutors.
- b) We do not consider that the additional time spent by students on projects outside of the classroom should be included in the definition of teaching hours. It is our view that instead this is self-directed learning.

1.14. TEC needs to consider how best to address this apparent under delivery that in our view has been occurring for at least the past six years.

Other issues

1.15. We have identified the following additional issues that are worthy of consideration by TEC:

- a) There are variances between the actual duration of Land Based Skills courses relative to the course start and end dates provided to TEC. It appears that the course duration is actually significantly shorter than the duration that would be anticipated from a review of the start and end dates provided to TEC. ABT has acknowledged that "there have been some variances in the actual duration of the land-based skill courses²". We have calculated that only 35% of the funded teaching hours have been delivered in relation to the Land Based Skills qualification before any adjustments for a possible shortfall in duration of delivery. Any further adjustment would reduce this further. We recommend that TEC addresses this with ABT and this is monitored closely going forward;
- b) We have noted two student responses in the CHIP programme in relation to tutor feedback and assessments that indicated that the tutor gave students the answers to allow the individuals and class to complete the unit standards. We recommend that TEC consider whether or not this is of concern to them;
- c) STEO does not accurately reflect course delivery for two of the ABT programmes compared to the NZQA Programme Approval Letter. Agribusiness advised us that the differences arose due to administrative errors (by staff no longer working at ABT), in inputting hours and that this error was not identified due to weaknesses in handover procedures. STEO should be updated to ensure that TEC has access to accurate information in regard to the breakdown of learning hours delivered. In addition, TEC should request details of ABT's procedures for ensuring that STEO is accurate and complete; and
- d) Some students we spoke to during the interview process had not received their certificates or did not know whether they would be receiving a certificate. ABT has investigated this issue and has advised us that this was an isolated incident, and that further procedures have been put in place to ensure that similar situations do not occur going forward.

1.16. We did not identify any subcontractors being used by Agribusiness for course delivery.

1.17. Overall, we were comfortable with the underlying student records from the samples we selected and we identified no material issues with either the enrolment records or the course completion reporting.

² Letter from [OIA s. 9\(2\)\(a\)](#) to Graeme Cahalane, 21 April 2015.

2. Introduction

Background

- 2.1 Agribusiness is a PTE as defined in the Education Act 1989. ABT's website describes its focus as "providing training to many of the land based industries in New Zealand". These include agriculture, horticulture, equine and apiculture. Given the rural industry based focus, there is often a large practical component to the programmes as well as theoretical, which usually involves work experience.
- 2.2 In the Confirmation of Investment Plan Funding letters dated 25 November 2011, 7 December 2012, and 20 December 2013 addressed to **Withheld under OIA s. 9(2)(a)**, ABT was approved for SAC funding of \$9,204,494.75 (excl. GST) over the three year period.
- 2.3 The actual SAC funding received by ABT since 2009, based on their SDR data returns to TEC, is set out in the following table:

	2009	2010	2011	2012	2013	2014	Total
Certificate in Horticulture Industry Practice PC9748	\$1,354,676	\$1,499,352	\$1,186,598	\$1,079,382	\$1,394,938	\$1,603,100	\$8,118,046
National Certificate in Horticulture L3 NC1471	-	\$119,783	\$649,108	\$1,036,097	\$678,966	\$645,266	\$3,129,220
National Certificate in Horticulture L4 NC1014	-	-	-	\$93,242	\$57,360	\$107,471	\$258,072
Certificate in Land Based Skills PC9667	\$920,189.	\$827,862	\$700,837	\$735,616	\$635,002	\$639,695	\$4,459,201
National Certificate in Apiculture NC1069	-	-	\$22,230	\$43,527	\$21,677	-	\$87,434
New Zealand Certificate in Apiculture NZ2223	-	-	-	-	-	\$340,127	\$340,127
Other Qualifications	\$229,468	\$105,171	\$41,099	\$27,586	\$30,689	\$26,071	\$460,136
Total	\$2,504,333	\$2,552,168	\$2,599,872	\$3,015,450	\$2,818,632	\$3,361,730	\$16,852,236

2.4 TEC has engaged Deloitte to undertake a focused review of six selected programmes at Agribusiness. The funding for these six programmes makes up 97% of the total funding received from TEC between 2009 and 2014. Details of these programmes are included in the table below:

Programme ³	Date of NZQA Programme Approval Letter	Level	Credits/ Duration	EFTS 2014
Certificate in Land Based Skills	27 July 2006	3	80 credits 40 weeks	54.99
Certificate in Horticultural Industry Practice	3 July 2007	3	70 credits 40 weeks	137.43
National Certificate in Horticulture (Level 3)	23 December 2009	3	80 credits 53 weeks	51.32
National Certificate in Horticulture (Level 4)	13 July 2012	4	140 credits 70 weeks	9.89
National Certificate in Apiculture (last intake mid 2012)	30 May 2011	3	71 credits 45 weeks	Nil
New Zealand Certificate in Apiculture (first intake mid 2014)	R0482 undated	3	65 credits 45 weeks	20.34

Scope of this Report

2.5 TEC initially engaged Deloitte to undertake a focused review of five selected programmes at ABT to establish if the teaching delivery adheres to that approved by NZQA in order to be funded by TEC. The engagement includes a review of the processes and practices and underlying documentation to investigate whether the programmes:

- a) are taught in accordance with NZQA's approval and TEC's funding requirements;
- b) comply with the teaching hours and weeks in the NZQA Programme Approval Letters and entered into STEO;
- c) have evidence of sufficient underlying enrolment and assessment records; and
- d) have any subcontracting relationships in place and, if so, understand the relationship and any oversight of these subcontractor activities provided by ABT.

2.6 After providing a verbal update to TEC of our draft findings, our review was extended to incorporate a sixth programme and to expand the scope of our review from the 2013 and 2014 academic years back to all years since 2009. This meant that all programmes with a material number of EFTS funded in the past six years have been included in our review.

³ Sourced from the NZQA Programme Approval Letters for each individual programme. The duration of the courses excludes holiday weeks.

Limitations of this Report

- 2.7 The terms of this engagement and the scope of the work you have asked us to undertake do not comprise an audit or a review engagement, and the assurances associated with those 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.
- 2.8 The financial and other information contained in this report have been provided by ABT, TEC, NZQA and various ABT 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"> • NZQA Programme Details documents for the six programmes • NZQA Approval and Accreditation Letters for the six programmes, including the Course and Qualifications Details Forms ("NZQA Programme Approval Letter") • NZQA Guidelines for approval of programmes of study leading to qualifications listed on the NZ Qualifications Framework and accreditation of tertiary education providers, Version 1.0 September 2011 • NZQA Criteria, requirements and guidelines for course approval and accreditation, Version 6 August 2010 • ABT enrolment records, programme documents, timetables, and course approval and accreditation applications for the five selected programmes
Staff ABT	<ul style="list-style-type: none"> • Withheld under OIA s. 9(2)(a) • [Redacted] • [Redacted] • Programme tutors: <ul style="list-style-type: none"> ○ OIA s. 9(2)(a) • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted] • [Redacted]
Other	<ul style="list-style-type: none"> • A total of 40 students were interviewed across the five selected programmes • Birgit Jaegle (TEC) • Graham Cahalane (TEC)

3. Compliance with NZQA Approval and TEC Funding Requirements

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

- a) Are taught in accordance with NZQA's approval and TEC funding requirements; and
- b) Comply with the teaching hours and weeks entered by Agribusiness into the TEC database "STEO".

Programme Alignment with Approval and Funding Requirements

3.2 We set out below both the required hours under the NZQA Programme Approval Letters and the hours submitted by ABT into STEO. We completed the following analysis of this information:

- a) We identified any differences between the NZQA Programme Approval Letter hours and the hours submitted into STEO (red below);
- b) If we have identified a difference between the NZQA Programme Approval Letters and STEO, we have then traced this change through the ABT Academic Board Minutes; and
- c) We obtained any approval of change documents. We compared these to the current timetables at ABT to check whether there were any unapproved changes that were required to go through NZQA for approval.

3.3 We found that in three of the six courses reviewed there was a difference between STEO and the NZQA Programme Approval Letter, and there was no evidence to suggest that this had been discussed or approved in the Academic Board Minutes.

3.4 Set out below is a table recording the courses we reviewed, our findings, and the relevant supporting documentation.

Reconciliation of STEO with NZQA Programme Approval Letters

Course	NZQA Programme Approval Letter	STEO (TEC)	Change in Academic minutes?	Changes through NZQA?
Certificate in Horticulture Industry Practice PC9748	Teaching: 680 Self-directed: 120 Work Experience: - Total hours: 800	Teaching: 680 Self-directed: 80 Work Experience: 40 Total hours: 800	The changes in the work experience hours are not reflected in the Academic board minutes we have reviewed.	No - the NZQA R0482 does not include work experience and does not refer to work experience as a method of delivery.
National Certificate in Horticulture L3 NC1471	Teaching: 424 Self-directed: 636 Work Experience: - Total hours: 1,060	Teaching: 424 Self-directed: 265 Work Experience: 636 Total hours: 1,325	The changes in the work experience hours are not reflected in the Academic board minutes we have reviewed.	No - the NZQA R0482 does not include work experience and does not refer to work experience as a method of delivery.
National Certificate in Horticulture L4 NC1014	Teaching: 420 Self-directed: 980 Work Experience: - Total hours: 1,400	Teaching: 420 Self-directed: 700 Work Experience: 280 Total hours: 1,400	The changes in the work experience hours are not reflected in the Academic board minutes we have reviewed.	No - the NZQA R0482 does not include work experience and does not refer to work experience as a method of delivery.
Certificate in Land Based Skills PC9667	Teaching: 480 Self-directed: 320 Total hours: 800	Teaching: 480 Self-directed: 320 Total hours: 800	N/A No differences	N/A
National Certificate in Apiculture NC1069	Teaching: 315 Self-directed: 360 Total hours: 675	Teaching: 315 Self-directed: 360 Total hours: 675	N/A No differences	N/A
New Zealand Certificate in Apiculture NZ2223	Teaching: 360 Self-directed: 315 Total hours: 675 ⁴	Teaching: 360 Self-directed: 315 Total hours: 675	N/A No differences	N/A

3.5 With the exception of the National Certificate in Horticulture (Level 3), there were no differences between the NZQA Programme Approval Letter and STEO with the total learning hours for any of the programmes, which drives the credit and EFTS value. There were also no differences in the teaching hours.

3.6 However, we identified some issues including:

- a) There is a material variance between the work experience hours recorded in STEO and the programme documents for the National Certificate in Horticulture (Level 3) and National Certificate in Horticulture (Level 4). These discrepancies have contributed to the total learning hours recorded in STEO being greater than in the NZQA Programme Approval Letters.
- b) There is a minor variance in the work experience hours required between STEO and the programme documents for the Certificate in Horticulture Industry Practice. However, the total learning hours in STEO and the R0482 are consistent.

⁴ Based on the hours recorded on the NZQA R0482 document – programme approval letter was not provided by NZQA

- 3.7 We asked Agribusiness to explain the variance and describe its process for ensuring that STEO accurately reflects the intended course delivery. Agribusiness advised us that the differences arose due to administrative errors in inputting hours and that this error was not identified due to weaknesses in handover procedures when a member of staff resigned.⁵
- 3.8 We recommend that STEO is updated on a timely basis to reflect the changes in teaching, work experience and self-directed learning hours to ensure that TEC has access to accurate information regarding the breakdown of learning hours being delivered.

Actual delivery of Teaching Hours

- 3.9 We were advised by TEC that an important part of the funding provided to Agribusiness is based on the total learning hours delivered to each student. The total learning hours are made up of teaching hours and self-directed learning hours. These quantities (teaching, self-directed and total learning hours) were entered by ABT into the TEC system STEO when the programmes were originally approved for funding, and are also the levels that TEC understood they were funding ABT for at the time.
- 3.10 Our review **focused on the teaching hour component** of learning hours (to give a percentage of delivery) given the strong evidence base of timetables in conjunction with tutor and student interviews.
- 3.11 The self-directed 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 student interview section below), as well as evidence of assessments, give us a level of comfort around whether these hours are being carried out by the student, as well as an indication of the quantity.
- 3.12 Although there is no definition of teaching hours that we have been able to identify in the TEC Confirmation of Investment Plan Funding letters, we have used the following definitions which are referred to on the NZQA website⁶ as guidance:
- Directed hours: Direct contact time with teachers and trainers;
 - Self-directed hours: Time spent in studying and doing assignments and undertaking practical tasks; and
 - Learning hours: Directed hours, self-directed hours and time spent in assessment.
- 3.13 When we **refer to teaching hours in this report we are referring to the directed hours** and the time spent in assessment. That is, we define teaching hours as being learning hours but excluding any self-directed hours.
- 3.14 From these definitions it is our view that in principal, teaching hours relate to direct contact time between tutors and learners, and self-directed hours relates to the learning a student undertakes on their own. We have been advised by TEC that they are in agreement with this approach.
- 3.15 Our calculation of the total teaching hours per programme is set out in the table below. Our approach has been conservative (i.e. we have used the maximum amount of hours delivered where there was a variance between cohorts. In addition we have provided an allowance for general tutor assistance). Teaching hours were broadly delivered through five different work streams:

⁵ Training Hours and Work Experience hours – STEO. Attached to email from [DIA s. 9\(2\)\(a\)](#) to [DIA s. 9\(2\)\(a\)](#) 19 December 2014

⁶ <http://www.nzqa.govt.nz/studying-in-new-zealand/understand-nz-quals/>

- a) **Classes** – we have relied on the programme timetables, student interviews and tutor interviews. When calculating the class hours we have relied on the timetable which listed the **maximum** number of hours delivered to students. We note that the tutor and student interviews were consistent with the timetables;
- b) **Tutorials** - the programme timetables refer to 30 minutes being available before and after classes for student assistance. Accordingly, we have provided an allowance of one hour per class using the time table with the **maximum** number of classes delivered;
- c) **Field days** - some programme timetables, tutor interviews and student interviews referred to site field days that were provided. The **maximum** amount of field days referred to in these documents was three days and we have provided for a conservative allowance of three full days;
- d) **Site visits** – student and tutor interviews referred to occasions where the tutor would visit students (for example to check on progress with propagation units or beehives). We have provided an allowance of 2 x 2 hour site visits for the propagation units; and 2 x 4 hour site visits for the beehives; and
- e) **Allowance for student contact** – we have provided an additional allowance of one hour per week for miscellaneous student contact per student (emails, phone calls, one on one contact and discussions, individual student site visits etc). ABT has stated that tutors spend a significant amount of time outside scheduled class room hours assisting students with their directed learning, practical skills and assignments, and based on our tutor interviews we agree with this fact. We consider this one hour allowance to be a generous proxy and a **maximum** figure. If there were 15 students in one class, this would equate to an additional 15 hours of the tutors time per week (a significant amount of time).

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. This is partly based on guidance in the latest New Zealand Qualifications Framework dated November 2013 that sets out *“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.”* It is also partly based on the fact that the funding from TEC is also on a **per student** (“EFTS”) basis. We have previously confirmed with NZQA that this is the right basis to use.

- 3.16 We have set out below our calculation of the teaching hours delivered on this basis (from student/tutor interviews; and timetables provided by ABT) and a comparison to the hours required to be delivered under the NZQA Programme Approval Letters. We have, in our opinion, taken a conservative approach in that where timetables reflected different total teaching hours for the same courses, we have taken the **highest total hours** and applied it across every instance of that programme. That is, there may have been individual cohorts with a lower delivery, however we have used the highest teaching hours delivered as being representative of the qualification.
- 3.17 As set out in paragraph 2.4, the CHIP and LBS qualifications have been offered since prior to 2009 and the remaining four commenced after this date. Our review of the 2009 – 2014 timetable documents and student/tutor interviews showed that the teaching hours delivered in each programme has been more or less consistent throughout our review period.
- 3.18 ABT provided us with a document on 14 March 2015 (set out at Appendix 1) outlining its calculation of the teaching hours provided in relation to the selected courses. We have compared the calculation by ABT to our calculations in the tables on the following pages.

Teaching hour work streams	CHIP (PC9748)		Certificate in Land Based Skills (PC9667)	
	Deloitte	ABT	Deloitte	ABT
Credits	70	70	80	75
Weeks (excluding holiday weeks)	40	40	40	40
Required teaching hours per week	17		12	
Total teaching hours required	680	580⁷	480	480
<i>Add teaching time delivered</i>				
- Classes	75	67	112	136
- Tutorial (30 minutes before/after class)	25	20	14	17
- Field days	24	10	-	
- Site visits	4	6	-	
Subtotal	128	103	126	153
<i>Deloitte position add allowance for additional student contact</i>				
- 1 hour per week per student	40		40	
<i>ABT position add allowance for additional time</i>				
- Flexible Tutor Support/On-line Shared Learning (7.5 hrs per wk) ⁸		300		300
- Directed learning ⁹		180		83
Total teaching hours delivered	168	583	166	536
Less teaching hours required (above)	680	580	480	480
Teaching hours (shortfall) / surplus	(512)	3	(314)	56
Percentage of teaching hours delivered	25%	101%	35%	125%

⁷ ABT's position is that 70 credits could not equate to any more than 700 hours in total, with 120 hours of this being self-directed. Their position is that the NZQA Programme Approval Letter is incorrect.

⁸ Note that this figure is a total amount and is **not** per student

⁹ Described by ABT as "Practical applications at home"

Teaching hour work streams	NZ Cert Apiculture (NZ2223)		Nat Cert Apiculture (NC1069)	
	Deloitte	ABT	Deloitte	ABT
Credits	65	65	71	71
Weeks (excluding holiday weeks)	45	45	45	45
Required teaching hours per week	8		7	
Total teaching hours required	360	360	315	290¹⁰
<i>Add teaching time delivered</i>				
- Classes	135	137	172	165.25
- Tutorial (30 minutes before/after class)	18	19	34	34
- Field days	-	-	-	-
- Site visits	8	-	8	-
Subtotal	161	156	214	199.25
<i>Deloitte position add allowance for additional student contact</i>				
- 1 hour per week per student	45		45	
<i>ABT position add allowance for additional time</i>				
- Flexible Tutor Support/On-line Shared Learning (7.5 hrs per wk)		113		90
- Directed learning ¹¹		230		94
Total teaching hours delivered	206	499	259	383.25
Less teaching hours required (above)	360	360	315	290
Teaching hours (shortfall)/surplus	(154)	139	(56)	93.25
Percentage of teaching hours delivered	57%	138%	82%	132%

¹⁰ ABT assert that students only need 65 credits as already have credits from completing level 2. Therefore ABT assert that 650 learning hours required. 650-360 self-directed hours = 290 teaching hours

¹¹ Described by ABT as "Practical applications at home"

Teaching hour work streams	Nat Cert Hort L3 ¹² (NC1471)		Nat Cert Hort L4 (NC1014)	
	Deloitte	ABT	Deloitte	ABT
Credits	105	105	140	140
Weeks (excluding holiday weeks)	53	23	70	22
Required teaching hours per week	8		6	
Total teaching hours required	424	193.5	420	139.5
<i>Add teaching time delivered</i>				
- Classes	123	71	144	21
- Tutorial (30 minutes before/after class)	38	21	45	7
- Field days	24	-	24	
- Site visits	4	-	4	
Subtotal	189	92	217	28
<i>Deloitte position add allowance for additional student contact</i>				
- 1 hour per week per student	53		70	
<i>ABT position add allowance for additional time</i>				
- Flexible Tutor Support/On-line Shared Learning (7.5 hrs per wk)		173		165
- Directed learning ¹³		90		
Total teaching hours delivered	242	355	287	193
Less teaching hours required (above)	424	193.5	420	139.5
Teaching hours (shortfall)/surplus	(182)	161.5	(133)	53.5
Percentage of teaching hours delivered	57%	183%	68%	138%

3.19 Our review of class timetables and student/tutor interviews leads us to conclude that Agribusiness has under-delivered the required teaching hours for all six courses we reviewed throughout the period from 2009 to 2014.

ABT's position

3.20 ABT's own calculation of the delivered hours varies markedly from our findings. The paper that sets out ABT's calculation and the justification for the amounts used in the calculation is included at **Appendix 1**.

3.21 ABT notes that it has not been able to obtain a definition of teaching hours and it has based its calculation on a definition of learning hours that has been taken from **TEC Rule SAC038**. This includes:

¹² We have added the CHIP time to the Nat Cert time to establish the time for the full qualification. Agribusiness have based their calculation on 45 credits only

¹³ Described by ABT as "practical applications at home"

- Lecturer and tutor contact hours, including workshops and tutorials;
- Completion of test and assignments;
- Supervised practical placement;
- Study time;
- Self directed learning; and
- Examination periods.

3.22 In their submission, Agribusiness has broken down the learning hours into directed and self-directed. We have used their directed hours in the comparison table above.

3.23 The major differences between the Deloitte and the ABT calculations are:

- a) **Additional student contact** - ABT stated that “A survey of tutors found that on average the tutors are spending 7.5 hours per week providing additional student support outside of the timetabled class hours”. This figure is captured in ABT’s calculation as “Flexible Tutor Support/On-line Shared Learning” and is included in their total for directed hours.

Based on this statement and our further discussions with ABT, it appears that ABT’s position is that tutors are each spending 7.5 hours **in total** per week assisting students outside timetabled hours (i.e. their calculation is not based on the teaching hours per student, but is instead per tutor). In our view, this is a flawed approach to calculating the delivered teaching hours and would result in a significant level of double-counting of actual teaching hours provided. Assuming an average class size of 10 students, adopting ABT’s methodology would result in tutors being funded by TEC for 75 hours per week of additional support (which is fundamentally unlikely) and it does not reconcile with comments taken from the student and tutor interviews we conducted.

We note, however, that 7.5 hours per week spread across, say, 8 to 10 students is approximately one hour of support time **per student**, per week, which in our opinion may be a more accurate representation of the additional tutor support time that is provided to students.

In comparison, we have instead provided a global allowance of 1 hour of individual **per student** teaching hours for each week of the courses.

- b) **Directed learning** - ABT considers that “any activity directed by the tutor is not self-directed learning as the student is not acting unassisted”. From ABT’s explanations, this encompasses the preparation and management of the student’s propagation units and beehives at their own homes. An example of directed learning, outside the timetabled hours, provided to us by ABT was students being directed by their tutor to manage their beehives for honey production and disease risk. The beehives are located in rural locations and need attending regularly by students under direction by their tutor. The students need ongoing support and guidance from the tutor to ensure the competencies around beehive management are learned and implemented as part of the overall competency explanation.

We agree that the contact time with the tutors supporting and directing the student would be included as teaching hours. However, in our view, the majority of time spent by the student managing the beehives on their own does not constitute teaching hours and we consider this should be categorised as “self-directed” learning, consistent with the NZQA definition of self-directed learning (set out in paragraph 3.12). This is still a very important component of the students learning within the programme. Accordingly we have not included an allowance for the student’s maintenance of a propagation unit or beehive in our calculation of “teaching hours”.

As previously mentioned, we have also allowed for additional time within our calculation on a per student basis such as emailing, on-line or phone conversations to support the student in the way described by ABT.

After receiving the initial response (Appendix 1) from Agribusiness, we did respond to them and ask if there was any further evidence that they could provide to support their view. We received further documents consisting of examples of a student's practical work book and record sheets for the directed practical exercises that are worked through during the course and emails sent between students to tutors as evidence of additional tutor support. They also provided an additional example in their second response (Appendix 2) of a National Certificate in Apiculture Field Workbook.

The evidence that was provided does lend support to the view that additional tutor support does occur and that students are required to complete practical tasks at home. As previously mentioned, we agree with ABT that this is an important part of the students learning within the programme. However, it does not change our interpretation, based on the evidence at this point, that the majority of time would comprise of self-directed learning. The information still does not provide a reliable basis to quantify the self-directed learning time, as well as the portion of teaching hour time (or one on one contact time) the tutor spent with the individual student.

- c) **National Certificate in Horticulture Level 3** - ABT stated that *"Students only need 45 Credits to achieve this qualification. The remaining of the qualification has been met by completing the Certificate in Horticulture Industry Practice... 45 credits claimed therefore 450 learning hours required."*

Our understanding is that this Level 3 qualification is 105 credits. The students who enrol in this qualification have already completed the CHIP qualification and the 70 credits from this programme are cross-credited to Horticulture Level 3. Similarly, students enrolling in Horticulture Level 4 are required to complete 140 credits, however 105 credits have already been completed in the Level 3 qualification.

The tutors for Horticulture Level 3 and Horticulture Level 4 are each delivering the additional 35 credits required to complete the qualification. This appears to be consistent with the level of funding from TEC.

In the table above, we have calculated all of the hours that make up the qualification, regardless of whether or not they were cross-credited. That is, we have set out the teaching hours required to complete the whole qualification and we have included all the relevant hours delivered (e.g. for Horticulture Level 3 we have added the hours delivered in teaching the 35 credits to the hours delivered in teaching the CHIP course).

In contrast, ABT has set out only the credits that they believe apply to the course over and above those that are cross-credited. For this reason, the "total teaching hours required" for their calculations is lower than ours.

Self-directed learning

- 3.24 We have obtained evidence of self-directed learning from the interviews of students who completed the reviewed programmes and from discussions with tutors. As is the nature of this type of learning, the extent is highly variable.
- 3.25 In our view, self-directed learning encompasses learning that the student undertook outside class hours. Generally, this consisted of setting up and running a propagation unit or beehive at their homes; and completing readings that were provided by the tutor. We note that most students stated that the assessments were usually completed in class.
- 3.26 Any self-directed component will differ between students; 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 give us a level of comfort around the extent of these hours.

3.27 We have prepared a table summarising the 10 student responses per programme for self-directed learning as follows:

Course	Required self-directed hours per week (total) ¹⁴	Student response: Range of hours	Student response: General impression	Sufficient level of self-directed learning?
Certificate in Horticulture Industry Practice PC9748	3 hours per week (120 hours total)	Minimum respondent advised 1 hour per week; maximum respondent advised 20 hours per week.	In general, the respondents indicated that approximately 7 hours per week would be required. Students advised that more self-directed time required in first few weeks (breaking in ground, planting etc).	Yes. Students were generally undertaking more hours than required.
National Certificate in Horticulture (Level 3) NC1471	12 hours per week (636 hours total) ¹⁵	Minimum respondent advised 2 hours per week; maximum respondent advised 25 hours per week.	High degree of variability. About half of the students indicated 2 – 3 hours per week was required; the other half indicated 10 – 14 hours were required.	Possibly. Students that were most interested in the course appeared to complete enough self-directed study.
Certificate in Land Based Skills PC9667	8 hours per week (320 hours total)	None to five hours per week.	Self-directed learning was generally finishing theory work from class (completing course books and assessments) and practicing skills learned in job.	Unlikely Most students described completing most of the theory and practical requirements during the timetabled teaching hours.
National / New Zealand Certificate in Apiculture NC1069 & NZ2223	<u>Current (NZ2223):</u> 7 hours per week (315 hours total) <u>Prior (NC1069):</u> 8 hours per week (360 hours total)	Minimum respondent advised 2 hours per week; maximum respondent advised 4 hours per week.	Work mainly consisted of maintaining hives although there was some catching up to do on course work that had not been completed in class.	No. Students were generally undertaking about half of the required self-directed hours.

¹⁴ Based on approved programme documents

¹⁵ Hours entered into STEO were 636 work experience and a further 265 self-directed

- 3.28 Our general impression is that there is a large degree of variation in the amount of self-directed learning (as expected). In some qualifications there is likely to be a shortfall in the self-directed hours, based on the interviews that we conducted.
- 3.29 ABT considers that the activities described to us by students (maintaining propagation units and beehives etc.) fall within the “teaching hours” category. We disagree with ABT in respect of this point.

Student interviews

- 3.30 We interviewed a sample of 10 students in each programme to find out, from their perspective, more about the delivery of the programmes and the level of work (teaching and self-directed) required. In general, the student’s interviews supported our calculation of teaching hours¹⁶.
- 3.31 The student responses in relation to the teaching modes and classes generally matched the tutor comments.
- 3.32 The students generally enjoyed the programmes they enrolled in and had positive feedback about the tutors.
- 3.33 However, the student interviews highlighted the following matters. We have set out a brief description of the issue along with our recommendation:

Duration of study

- 3.34 Some Land Based Skills students stated during their interviews that their period of study was materially shorter than the timeframe recorded on the programme approval documentation (40 weeks) and the funding data provided by TEC. The timetables that we reviewed also had a wide variation in duration, with one as short as three months and several six to nine months. This variation reflects the diverse student groups enrolled in the course. For example, the students included prisoners, a group of high school students, students enrolled in other qualifications and large numbers of hobby farmers. Examples of students who reported a course with a short duration include:¹⁷
- a) NSN **OIA s. 9(2)(a)**: Student advised that they completed the course in December 2014, however, TEC data records that the student’s course commenced on 1 July 2014 and does not end until 30 April 2015;
 - b) NSN **OIA s. 9(2)(a)**: Student stated that the course took approximately 3 months to complete. However TEC data records the student studied for 10 months between March 2013 and January 2014 (0.7251 EFTs); and
 - c) NSN **OIA s. 9(2)(a)**: Student stated that the lifestyle block course was completed in October 2014 after studying for 6 months part time. However, TEC data records that this student studied for 10 months between 25 February and 31 December 2014.

¹⁶ Our student interviews were primarily students enrolled in 2013 and 2014 courses. We did not conduct student interviews for National Certificate in Horticulture Level 4.

¹⁷ We note that our sample size for the Land Based Skills course was ten students. As there is a high degree of variance in the answers (due to the different streams that are offered) we would recommend further interviews are conducted for each of the streams (Applied Fencing, Equine Care, Lifestyle Blocks etc).

- 3.35 Despite basing our assessment of delivery on the timetable that recorded the most hours of delivery, we have calculated that only 35% of the teaching hours for this course were delivered. We consider that further investigation could be conducted to ascertain the extent of the under-delivery in relation to some of the cohorts that appear to have delivered even less than the 35%. However, there is probably little benefit to gain from this exercise given that we have already formed a view that there is a material under-delivery. Instead, we recommend that TEC focus on monitoring this particular qualification going forward to ensure that all tutors are delivering the funded teaching hours. This should incorporate all groups of students as the delivery between tutors does not appear to be consistent.

Assessments

- 3.36 We have noted two student responses in the CHIP programme in relation to tutor feedback and assessments that indicated that the tutor gave the answers to allow the individuals and class to complete the unit standards. For example, a relevant quote includes:

“The second tutor who took over basically gave the students the answers in order for them to complete the course. No-one would have passed the course if it wasn't for him as they were all so far behind.”

- 3.37 We recommend that TEC consider whether or not this is of concern to them.

Level of self-directed learning

- 3.38 For some qualifications, many students indicated that the level of self-directed learning, which should be completed in addition to the teaching hours, was lower than what is suggested in the programme approval documents and STEO. We note that many assignments seem to be completed in class hours. A low level of self-directed learning hours may suggest that the courses require further content to be included.

Awarding of certificates

- 3.39 Some students we spoke to had not received their course certificates or did not know whether they would be receiving a certificate. We identified two instances where ABT has advised us that certificates were applied for on 11 December 2014. The funding for these students ended on 31 March 2014. There is a significant time gap between these two dates.
- 3.40 ABT has investigated this issue and has advised us that this was an isolated incident, and that further procedures have been put in place to ensure that similar situations do not occur going forward.

The programme approval process

- 3.41 We have discussed the programme approval process with ABT staff and have reviewed the following documents:
- a) Certificate in Land Based Skills Application for Course Approval and Accreditation dated May 2006;
 - b) Certificate in Horticultural Industry Practice Application for Course Approval and Accreditation dated June 2007;
 - c) National Certificate in Horticulture Level 3 Application for Course Approval and Accreditation dated August 2009; and
National Certificate in Apiculture Level 3 Application for Course Approval and Accreditation dated March 2011.

- 3.42 Under the heading “*Delivery and Learning Methods*” the programme application documents set out that teaching will be delivered via a mixture of methods including interactive teaching, tutor demonstration and practical application. The documents go on to set out that ABT may develop distance, internet or blended delivery options to assist learners in accessing study. None of the programme application documents contain detailed timetables or any indication of total teaching and/or learning hours to be delivered.
- 3.43 Our understanding of the programme approval process was that once the programme had been approved, ABT developed the detailed timetables that it considered were required to deliver sufficient teaching and learning hours for the Unit Standards to be delivered. The timetables were developed by lead tutors at ABT in conjunction with a staff member at ABT’s Head Office who was responsible for writing the programme documentation. ABT staff have informed us that there was a disconnect between these staff members and that this may have contributed to the lack of awareness of the fact that the timetables were scheduled to deliver significantly less teaching hours than the requirements set out in the programme approval documentation.

4. Review of Enrolment Records

Student Enrolments and Reporting of Course Completion

4.1 In this section we explain the results from selecting 15 student samples per programme (excluding National Certificate in Horticulture L4) and then reviewing the underlying information for each. This involved¹⁸:

- a) Sighting the enrolment application form for each student that was retained on file. We also confirmed whether or not the forms had been appropriately approved and signed by ABT;
- b) Checking that appropriate supporting information (e.g. birth certificate, passport) had been provided by the student to support their application;
- c) Reviewing the student details in their enrolment application forms to see if they reconciled with the details in ABT's Student Management System ("SMS");
- d) Reviewing the qualification completions reported to NZQA; and
- e) Reviewing evidence of assessment records for all students.

Course	Enrolments and supporting docs	Details reconcile in SMS and TEC	Evidence of Assessment Records	Completions and Standards reported
Certificate in Horticulture Industry Practice PC9748	✓ No issues	✓ No issues	✓ No issues	✓ No issues
National Certificate in Horticulture NC1471	- 1 out of 15 issue	✓ No issues	✓ No issues	✓ No issues
Certificate in Land Based Skills PC9667	✓ No issues	✓ No issues	✓ No issues	- 2 out of 15 issues

¹⁸ The students we selected were for the 2013 – 2014 calendar years, with the exception of the Apiculture courses, which included 2012 students

**National
Certificate in
Apiculture**

NC1069 &
NZ2223

✓
No issues

✓
No issues

✓
No issues

✓
No issues

- 4.2 We note that one student's enrolment form was missing (NC1471); however, we do not propose any further investigation into this matter. We also noted that in the Certificate for Land Based Skills, two students who were recorded in SMS as having completed the qualification did not have this reflected in the NZQA records (NSN **OIA s. 9(2)(a)** & NSN **OIA s. 9(2)(a)**). In both cases there appeared to be one unit missing from the NZQA records. This issue does not appear to be a widespread problem.
- 4.3 ABT has advised us that they have implemented robust enrolment procedures along with internal audits to check the validity of student enrolments, including instigating a central registry to improve the student enrolment system.
- 4.4 Overall, we were comfortable with the underlying student records from the samples we selected and we identified no material issues with either the enrolment records or the course completion reporting.

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Appendix 1 – ABT description of Learning Hours (Response One)

Agribusiness Training Ltd Learning Hours

Background

Agribusiness Training Ltd is a PTE specialising in part time training delivered to small cohorts in regions and rural towns throughout New Zealand. Our qualifications cover Agriculture, Horticulture and Apiculture. The training follows the seasons and whatever Mother Nature throws in our way. As such the learning needs to be flexible to make sure we meet the seasonal context of the topics. Mother Nature does not follow a Monday – Friday, eight hour work day and therefore clearly influences the delivery of our courses.

Introduction

The Deloitte/TEC review to date has been focused around “teaching hours”. While the portion of delivery that happens in the classroom is straight forward, the remainder of delivery is more complicated.

Firstly we need to establish what “teaching hours” mean.

Method 1

“Teaching hours” is a term that NZQA use as one of its titles on the “Course and Qualification Details Form”. This terminology is also used on the STEO website.

There is no definition available for this terminology and its use is limited to these two documents.

Method 2

On all other NZQA documents the term “Notional Learning Hours” is used.

The NZQA definition of “Notional Learning Hours” from the NZQA online glossary:

Notional learning hours include:

- a) direct contact time with teachers and trainers ('directed learning')
- b) time spent in studying, doing assignments, and undertaking practical tasks ('self-directed')
- c) time spent in assessment.

“Notional” as defined by the Oxford dictionary means “Existing as, or based on, a suggestion, estimate, theory; not existing in reality.”

It is worth noting that NZQA is not the only Qualification Authority to use the term “Notional hours”. Other definitions from South African and Hong Kong Qualifications include:

Notional learning hours are the estimated **learning** time taken by the 'average' student to achieve the specified **learning** outcomes of the course-unit or programme. They are therefore not a precise measure but provide students with an indication of the amount of study and degree of commitment expected.

It is defined in terms of **notional learning time**, and takes into account the total time likely to be spent by a learner in all modes of learning in respect of a specified programme, e.g. attendance in classes, experiment in laboratories, supervised or unsupervised sessions, practical learning at workshop/s, independent study in library, reading at home, and any other forms of study by the learner. Notional learning time is not limited to time-tabled teaching/lecturing hours in classrooms.

Method 3

TEC Rule SAC3+/013 states that one EFT equates to 1200 learning hours or 120 credits delivered over 34 weeks.

Definition of learning hours and teaching weeks.

For the purpose of this condition, learning hours and teaching weeks means:

- a) Lecturer and tutor contact hours, including workshops and tutorials; and
- b) Completion of test and assignments; and
- c) Supervised practical placement; and
- d) Study time; and
- e) Self directed learning; and
- f) Examination periods.

TEC Rule SAC038 also states the above definitions for the purpose of funding.

Taking into account the three varying methods of determining qualification delivery, as mentioned above, and the fact that this is a TEC review, we should align our hours to the TEC Rule of 10 learning hours per credit.

How are TEC "Learning Hours" defined?

- a) Lecturer and tutor contact hours, including workshops and tutorials;
This can be made up of classroom time, workshops, site visits, fieldtrips, formal tutorials and tutor directed activities.
- b) Completion of test and assignments
This can be made up of tests, projects and assignments
- c) Supervised practical placement
This is directed/ supervised practical work.
- d) Study Time
No definition required as it is self-explanatory.
- e) Self-directed Learning
What is self-directed learning? The best definition of self-directed learning from a pedagogical sense is Knowles:
"In its broadest meaning, 'self-directed learning' describes a process by which individuals take the initiative, with or without the assistance of others, in diagnosing their learning needs, formulating learning goals, identify human and material resources for learning, choosing and implement appropriate learning strategies, and evaluating learning outcomes." (Knowles, 1975, p. 18)
With this definition in mind, any activity directed by the tutor is not self- directed learning as the student is not acting unassisted. For this reason they are included in point a)
- f) Examination
No definition required as it is self-explanatory.

It is important to note that effective pedagogy recognises the significance of informal learning and this should be recognised as at least as significant as formal learning and should therefore be valued and appropriately utilised in formal process.

Certificate in Horticulture Industry Practice

Currently there are 12 tutors employed by Agribusiness Training for the delivery of horticulture courses. The majority of who are full time or high proportional FTE.

These tutors deliver on average 2 – 3 cohorts annually.

As tutoring horticulture for Agribusiness Training is their prime responsibility, this is where their time is totally consumed.

Based on the timetabled hours alone it is not possible to achieve the completion rates that these tutors are achieving. Additional tutorials, catch up sessions and site visits on top of the timetabled hours are scheduled when a particular cohort best needs them, and provides some of the additional support needed to assist the students with their qualification requirements.

As mentioned in the background, nature doesn't wait until the next scheduled class or tutorial. If there is a problem, students receive the support in a timely manner. At the first class, students are given their tutors contact details, (e-mail and mobile phone number). Tutors are available when they are not in class and willingly provide support when contacted in the evening and weekends.

As all of our learners are studying part time this flexible method of organising tutorials and having easy access to the tutor allows the learners to get a prompt response rather than waiting for a scheduled event sometime in the future.

As this has been used as a flexible approach, the recording of these sessions has not been a process we have had in place. We have gauged this from our tutor completion reports. Any short falls in tutor completions are monitored through our Internal Monitoring Process (IPM) and additional tutorials arranged to meet demand.

A survey of tutors found that on average the tutors are spending 7.5 hours per week providing additional student support outside of the timetabled class hours.

We can use our IPM process to break the hours down into both directed and self-directed.

Certificate in Horticulture Industry Practice

Class No. 21120 - 70 Credits therefore 700 learning Hours.

Class Contact	67 hours
Pre organised Tutorials	20 hours
Field Trips	10 hours
Site Visits	6 hours
Directed Learning	180 hours
Flexible Tutor Support/On-line Shared Learning	<u>300 hours</u>
Total Directed Learning	583 hours
Self Directed learning as per method 3	<u>98 hours</u>

Total Learning hours 681 hours

Please note that this qualification runs over 12 months to take in all four seasons. This is greater than the approved time of 40 weeks. The IPM process has calculated tutor support based on 40 weeks.

Certificate in Land Based Skills

As with the other qualifications, the Certificate in Land Based Skills cannot achieve the required completion rate from the timetabled hours alone.

Additional tutorials, catch up sessions and site visits on top of the timetabled hours are scheduled when a particular cohort best needs them and provides some of the additional support needed to assist the students with their qualification requirements.

As mentioned in the background, nature doesn't wait until the next scheduled class or tutorial. If there is a problem, students receive the support in a timely manner. At the first class, students are given their tutor's contact details (e-mail and mobile phone number). Tutors are available when they are not in class and willingly provide support when contacted in the evening and weekends.

As previously stated, all of our learners are studying part time and this flexible method of organising tutorials and having easy access to the tutor allows the learners to get a prompt response rather than waiting for a scheduled event sometime in the future.

As this has been used as a flexible approach, the recording of these sessions has not been a process we have had in place. We have gauged this from our tutor completion reports. Any short falls in tutor completions are monitored through our IPM process and additional tutorials arranged to meet demand.

Certificate in Land Based Skills

Class 31352 - 75 credits claimed therefore 750 learning hours required.

Class Contact	136 hours
Pre organised Tutorials	17 hours
Field Trips	0 hours
Site Visits	0 hours
Directed Learning	83 hours
Flexible Tutor Support/On-line Shared Learning	<u>340 hours</u>
Total Directed Learning	576 hours
Self Directed learning as per method 3	<u>144 hours</u>
Total Learning hours	720 hours

The majority of our agriculture tutors are full time, and as such have similar availability to the horticulture tutors.

National Certificate in Horticulture Level 3

As with the other qualifications, The National Certificate in Horticulture Level 3 cannot achieve the required completion rate from the timetabled hours alone.

Students typically complete the National Certificate in Horticulture Level 3 over several years, progressing from the Certificate in Horticulture Industry Practice.

Additional tutorials, catch up sessions and site visits on top of the timetabled hours are scheduled when a particular cohort best needs them, and provides some of the additional support needed to assist the students with their qualification requirements.

As mentioned in the background, nature doesn't wait until the next scheduled class or tutorial. If there is a problem, students receive the support in a timely manner. At the first class students are given their tutor's contact details (e-mail and mobile phone number). Tutors are available when they are not in class and willingly provide support when contacted in the evening and weekends.

As previously stated, all of our learners are studying part time, and this flexible method of organising tutorials and having easy access to the tutor allows the learners to get a prompt response rather than waiting for a scheduled event sometime in the future.

As this has been used as a flexible approach, the recording of these sessions has not been a process we have had in place. We have gauged this from our tutor completion reports. Any short falls in tutor completions are monitored through our IPM process and additional tutorials arranged to meet demand.

National Certificate in Horticulture Level 3

Class 21123

Students only need 45 Credits to achieve this qualification. The remaining of the qualification has been met by completing the Certificate in Horticulture Industry Practice.

45 credits claimed therefore 450 learning hours required.

Class Contact	71 hours
Pre organised Tutorials	21 hours
Field Trips	0 hours
Site Visits	0 hours
Directed Learning	90 hours
Flexible Tutor Support/On-line Shared Learning	<u>173 hours</u>
Total Directed Learning	355 hours
Self Directed learning as per method 3	<u>130 hours</u>
Total Learning hours	485 hours

NZ Certificate in Apiculture Level 3 – (new)

Currently there are seven tutors employed in Agribusiness Training for the delivery of the NZ Certificate in Apiculture Level 3 qualification. The majority of who are part time.

As tutoring Apiculture for Agribusiness Training is part time, their available hours are significantly reduced compared to the horticulture tutors. As such their average additional hours per week is approximately 2.5 hours.

Based on the timetabled hours alone it is not possible to achieve the completion rates that these tutors are achieving. Additional tutorials, catch up sessions and site visits on top of the timetabled hours are scheduled when a particular cohort best needs them, and provides some of the additional support needed to assist the students with their qualification requirements.

To supplement this, tutors are available for students to contact via email, text or phone outside class hours to help. This system provides a prompt response to student questions which is extremely important when managing a hive.

As this has been used as a flexible approach, the recording of these sessions has not been a process we have had in place. We have gauged this from our tutor completion reports. Any short falls in tutor completions are monitored through our IPM process and additional tutorials arranged to meet demand.

New Zealand Certificate in Apiculture Level 3

Class 70916 - 65 credits therefore 650 learning hours required.

Class Contact	137 hours
Pre organised Tutorials	19 hours
Field Trips	0 hours
Site Visits	0 hours
Directed Learning	230 hours
Flexible Tutor Support	<u>113 hours</u>
Total Directed learning	499 hours
Self Directed learning as per method 3	<u>125 hours</u>
Total Learning hours	624 hours

National Certificate in Apiculture Level 3 – (old)

When this qualification was delivered by Agribusiness Training there were two tutors involved – one part time and one full time.

As these students had previously completed other Apiculture qualifications, the level of additional input from the tutor was again reduced. As such, their average additional tutor support hours were two hours per week.

Based on the timetables hours alone it is not possible to achieve the completion rates that these tutors are achieving. Additional tutorials, catch up sessions and site visits on top of the timetabled hours are scheduled when a particular cohort best needs them, and provides some of the additional support needed to assist the students with their qualification requirements.

To supplement this, tutors are available for students to contact via email, text or phone outside class hours to help. This system provides a prompt response to student questions. A large proportion of this course is around queen bee rearing. This is a very precise process and prompt tutor support is important to its success.

As this has been used as a flexible approach, the recording of these sessions has not been a process we have had in place. We have gauged this from our tutor completion reports. Any short falls in tutor completions are monitored and additional tutorials arranged to meet demand.

National Certificate in Apiculture Level 3 Class 70683

Students only need to achieve 65 Credits to achieve this qualification. The remaining of the qualification has been met by completing the National Certificate in Apiculture – Level 2

65 credits claimed therefore 650 learning hours required.

Class Contact	165.25 hours
Pre organised Tutorials	34 hours
Field Trips	0 hours
Site Visits	0 hours
Directed Learning	94 hours
Flexible Tutor Support	<u>90 hours</u>
Total Directed Learning	383.25 hours
Self Directed learning as per method 3	<u>267 hours</u>
Total Learning hours	650.25 hours

Conclusion

The use of teaching hours as a method of determining how a qualification is being delivered is rather subjective when it does not have any clear outlines as to its meaning. The use of inconsistent terminology across organisations and systems does not provide any further clarity to the issue.

With the ambiguity surrounding Methods 1 & 2 mentioned in the introduction, the only clear method for calculating qualification delivery is by Method 3.

Agribusiness Training genuinely believes that it's above mentioned interpretation and its delivery methodology, applied by way of Method 3 across the programmes in question, is sufficient evidence to meet the requirements for the purposes of receiving TEC funding.

Appendix 2 – ABT Response Two

Ref: **OIA s.9(2)(a)**
Direct Line: **OIA s.9(2)(a)**
Cell Phone: **OIA s.9(2)(a)**
Email: **OIA s.9(2)(a)**@awslegal.com

21 April 2015

The Tertiary Education Commission
P O Box 27 048
WELLINGTON 6141

Attention: Graeme Cahalane

By Email: graeme.cahalane@tec.govt.nz

AGRIBUSINESS TRAINING LIMITED – AUDIT REPORT

We act on behalf of Agribusiness Training Limited ("ABT").

We have been instructed by ABT to respond to the draft Audit Report to the Tertiary Education Commission ("TEC") prepared by Deloitte (the "Report") with respect to ABT.

ABT acknowledges that there are specific issues identified in the Report that they are addressing but they are particularly concerned with the subjective assessment of the delivery of teaching hours and the exclusion of directed learning hours and tutorial support from the evaluation by Deloitte.

Background

ABT is an NZQA registered private training establishment, specialising in agriculture, horticulture and apiculture education.

The courses are delivered in regional towns in rural districts where:

- a. Physical resources are available to provide training; and
- b. the skills are in demand.

Courses are structured to permit students to complete a course on a part-time basis.

ABT advises that the course workloads are not always consistent from week to week. ABT delivers theoretical and practical training. The courses are, like the rural industry, staged in alignment with seasonality because of the practical aspects delivered. ABT advises that the practical component of each course is a combination of directed practical assignments/assessments and self-directed learning.

For example, ABT's apiculture course (beekeeping) is structured in alignment with the seasonal calendar of operations. Students are directed by their tutor to manage their beehives for honey

OIA s.9(2)(a)

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production and disease risk. The beehives are located in rural locations and need attending regularly by students under direction of their tutor. Beehive management is a typical example of tutor-directed learning where learners are guided and assisted with important management and seasonal timing issues such as swarming and bee disease identification and management. This directed learning is completed outside the timetabled hours and is an ongoing part of the course that students need support and guidance from the tutor to ensure the competencies around beehive management are learned and implemented as part of the overall competency expectation.

As part of ABT's course structure, ABT ensures that its tutors are readily contactable by email, on-line or by phone to assist students with their learning. Tutors, as mentioned above, spend significant amount of time outside of scheduled classroom hours assisting students with their directed learning and assignments. We attach as Annexure "A" for your information a field workbook for ABT's National Certificate in Apiculture for your review and consideration. The workbook is an example of directed learning undertaken by ABT.

The majority of the practical components of the courses cannot reasonably be undertaken on-site at ABT's campuses. Therefore, to achieve the practical skills required by the courses, directed learning outside of the timetabled courses is required by ABT.

Tutor site visits include one-on-one discussions and lower class numbers have the added value of providing essential robust support to students. Site visits to individual student's properties or non-campus locations require ABT tutors to spend a lot of time observing student techniques but also adding value to the overall learning experience by having one-to-one contact. ABT believes this justifies the value of a personalised education service as opposed to a generic campus-driven theoretical course.

It is on these principles that ABT has structured its courses so that each student must complete the theoretical component in scheduled classroom hours, together with directed and self-directed learning outside of scheduled classroom hours.

ABT courses are categorised as Level 2-3 qualifications pursuant to NZQF. For a student to acquire the appropriate level for their qualification, some supervision is required to be given to the students by ABT. A student, to achieve a Level 2 qualification, is required to have some responsibility for their own learning and performance. For a Level 3 qualification, a student is required to assume the major responsibility for their own learning and performance. Therefore, ABT has structured elements within the courses for students to undertake their own learning.

ABT's Acknowledgements

– Course Duration

As identified in clauses 1.14(a), 3.29 and 3.30 of the Report, ABT acknowledges that there have been some variances in the actual duration of the land-based skill courses. ABT advise they have implemented a process to monitor delivery of the course duration but, however, dispute the 35% under delivery of teaching hours claim.

– Variance in STEO

It is acknowledged by ABT that there has been a variance in the work experience hours recorded in STEO. ABT have reviewed this and advised that the error was inadvertent. Previously, compilation of the records was undertaken by various members of staff who are no longer with ABT. ABT advise that the responsibility for completion of the records has now been designated to their Managing Director.

– Course Certificates

Identified pursuant to clauses 1.14(d), 3.35 and 3.36 of the Report, ABT has investigated and advises that this is an isolated incident. ABT advise that further procedures have been put in place to ensure that further similar situations shall not occur.

– Student Records

Claus 4.2 of the Report identifies that one student's enrolment form was missing. ABT advise they have implemented robust enrolment procedures along with internal audits to check the validity of student enrolments. More recently, ABT has instigated a central registry to improve the student enrolment system.

Matters that ABT Dispute

– Under-delivery of Teaching Hours

Deloitte states that there is an apparent under delivery of teaching hours. ABT disputes that finding in its entirety.

In preparing the Report, in ABT's opinion, Deloitte have subjectively determined what "teaching hours" comprises.

Deloitte even acknowledges within the Report that there is no contractual definition of "teaching hours".

ABT advise to their knowledge that there is no coherent or accepted definition of "teaching hours" even between TEC and NZQA.

NZQA refers to the term "notional learning hours". NZQA definition of "notional learning hours" includes:

- a. Direct contact with teachers and trainers (directed learning);
- b. Time spent in studying, doing assignments and undertaking practical task (self-directed); and
- c. Time in assessment.

"Notional learning hours" are the estimated learning time to be taken by an average student to achieve the specified learning outcomes of the course. It would appear that "notional learning hours" is not limited to the timetabled teaching/lecturing hours in classrooms.

Further, in support of ABT's contention, ABT refers you to TEC Rule SAC3/013. TEC Rule SAC3/013 refers to learning hours and teaching weeks. TEC defines learning hours and teaching weeks as:

- a. Lecturer and tutor contact hours, including workshops and tutorials; and
- b. Completion of tests and assignments; and
- c. Supervised practical placement; and
- d. Study time; and
- e. Self-directed; and
- f. Examination periods.

TEC applies the definition of learning hours and teaching weeks in determining funding assistance. This is stated by Deloitte in clause 3.8 of the Report. However, Deloitte has focused their investigation on "teaching hours", which is only a part component of learning hours and teaching weeks.

Given that the Report has been prepared for TEC, we would have thought the definition most appropriate to assess compliance of ABT is TEC's own definition of learning hours and teaching weeks. Given the practical aspects of the courses operated by ABT, TEC's definition of learning hours and teaching weeks is the most appropriate and encompasses all learning methods.

If TEC's definition of learning hours and teaching weeks were adopted, then the directed practical assignment/learning under ABT would be included.

With reference to clause 3.14 of the Report and associated table, it is the assumption by Deloitte that in order to comply with the funding requirements, ABT must provide the required contact teaching hours. That, in ABT's opinion, is not the basis of how funding is provided. Deloitte's assumption that ABT has been "under-delivering" is refuted.

ABT's contention is that the directed practical aspects of the courses are a significant component of each student's learning and requirement to achieve the appropriate qualification for the courses ABT provide. ABT considers that students would not foresee the benefit in simply attending classroom lectures on theory without the practical physical application of that theory. ABT believe that Deloitte's have not considered the directed practical application of the courses provided and this should not be disregarded.

The Report does not consider that additional time spent by students on practical learning outside the classroom should be included in the definition of teaching hours and such is deemed to be self-directed. Deloitte have subjectively defined what they believe as "teaching hours". ABT contend otherwise.

In contrast to the Report, we refer to Deloitte's report on Te Whare Wananga O Awanuiarangi Investigation ("TWWOA").

Clause 5.31 of the TWWOA report includes as "teaching hours", directed learning. Directed learning is defined with reference to a letter from Dr Karen Poutasi to Professor Graeme Smith dated 18 June 2014. Dr Karen Poutasi defines directed learning as: "learning that is directed by tutors. Methods could include classes, tutorials, workshops, working through workbooks, on-line/web delivered content".

On that basis, the practical assignments/workbooks required to be completed by ABT should be included as directed learning hours within the Report. We can't see any reason why directed learning by ABT should be excluded from the assessment of ABT and their performance. Deloitte, in preparing the Report, appears to contradict the TWWOA report. ABT can't understand why the diverging application/definition of "teaching hours".

Further, with respect to Deloitte's definition and application of "teaching hours", they have ignored the tutorial support provided by ABT. A component of each course is a requirement that each student undertakes some form of self-directed learning. Tutors are available to assist students not only with their directed learning but also their self-directed learning. Tutors are available in person, on line, by email or telephone if required by a student.

With reference to NZQA's definition of "notional learning hours", not all students may require or elect further assistance of tutors in order to obtain their qualifications. The Report does not identify this. If, however, required, the availability of tutor support is there if needed for a student to complete their "notional learning hours".

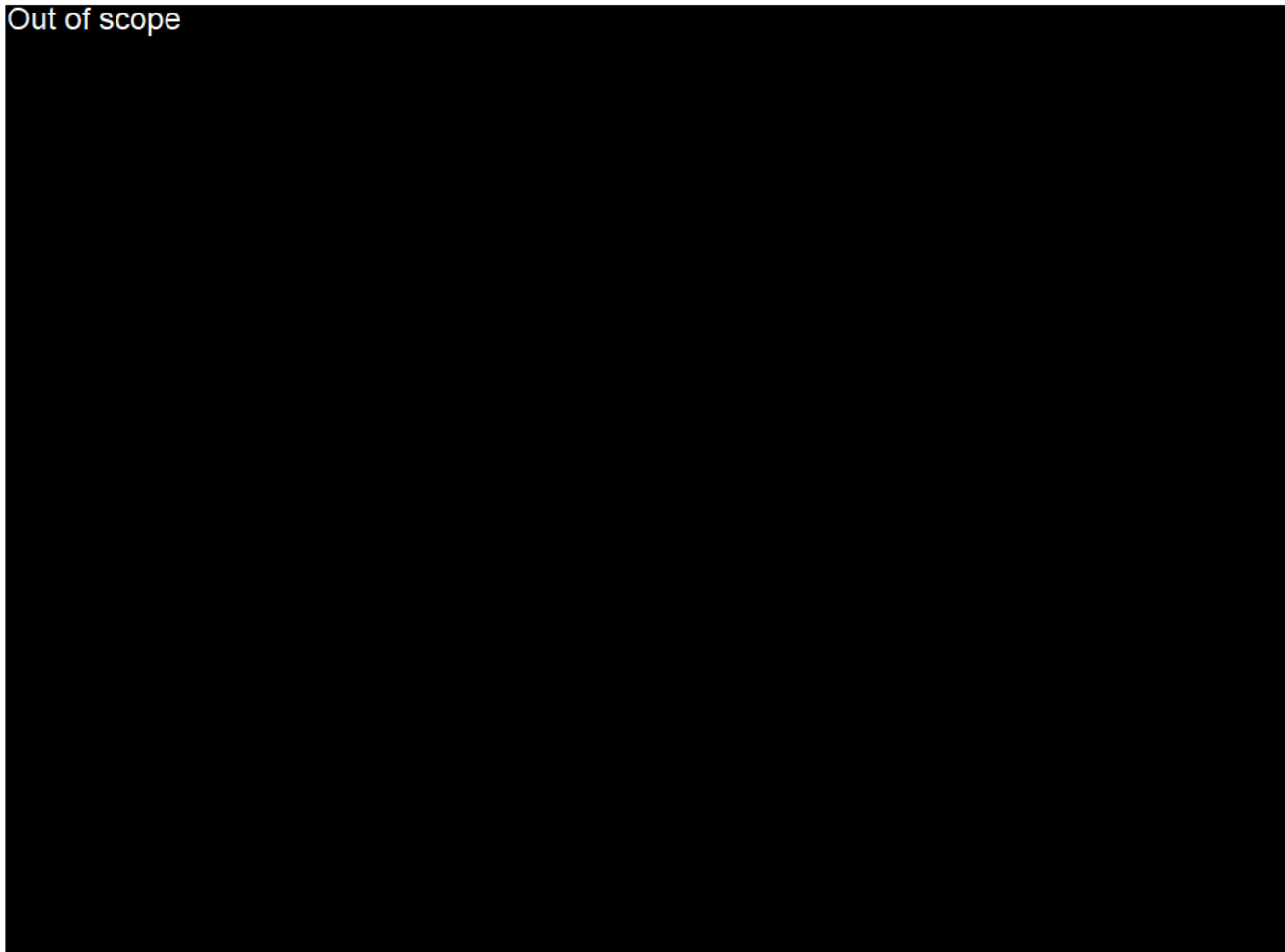
ABT contends that Deloitte's application/definition of "teaching hours" is unrealistic and does not take into account the directed physical/practical learning of ABT's courses that are required to be completed outside of the scheduled lectures.

Further, Deloitte does not take into account that for students to complete courses, there is a self-directed learning component required. ABT provides tutors to assist with the self-directed learning should it be required and the availability of tutor support should be included in the teaching hours notwithstanding that only some of the students may require this support.

If the above contention is not accepted, then ABT challenges Deloitte's focus on "teaching hours". Funding by TEC is based on learning hours and teaching weeks and this is reiterated in the Report. The focus on "teaching hours" is only part of the component for funding by TEC. Therefore, any assertion that ABT has been under-delivering is disputed and ABT challenges the scope of the Report.


Out of scope

Out of scope



Summary

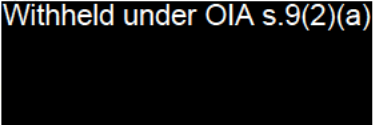
In summary, ABT contends that:

- a. There is no under-delivery of teaching hours;
 - b. Deloitte's focus on "teaching hours" is not aligned with TEC's funding requirements and that the Report should be focused on learning hours and teaching weeks; and
 - c. **Out of scope**
- 

We urge TEC to review the Report in light of ABT's submissions.

AWS Legal

Withheld under OIA s.9(2)(a)



Copy to: Deloitte

Attention: **OIA s.9(2)(a)**

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OIA s.9(2)(a)

AGRIBUSINESS TRAINING LIMITED

Addendum to the Report to the Tertiary Education Commission

On 28 August 2015, in response to TEC's letters of 7 and 14 August 2015, Agribusiness submitted the following breakdown for the Certificates in Horticultural Industry Practice (CHIP) and in Land-Based Studies (LBS):

	CHIP	LBS
1 - Learning hours required	700.0	800
2 - Classes	75.0	112
3 - Tutorial	25.0	14
4 - Field Days	24.0	0
5 - Site Visits	4.0	0
6 - Flexible Tutor Support	40.0	40
7 - Directed Learning	180.0	83
8 - Assessment	31.5	51
9 - Self-directed learning	120.0	320
Total	499.5	620
Total %	71.36%	77.50%

The first six categories are consistent with our assessment.

The directed learning hours (Category 7) of 180 & 83 are consistent with the submission from Agribusiness that was previously provided to us on 12 March 2015. At this time it was described as *"Practical applications at home"*.

There was no "assessment time" (Category 8) included in the 12 March submission. However, there was self-directed learning hours included - (98 for CHIP and 144 for LBS).

The self-directed hours were described by Agribusiness as *"Reading notes and completing assessments in own time"*. We note that in this latest (28 August) submission, the Agribusiness submitted self-directed learning hours (Category 9) have significantly increased with no further explanation.

The additional "assessment" hours were initially submitted to TEC by Agribusiness in a letter from Chen Palmer of 22 June 2015. This submission included as Appendix B a document that recorded each unit standard (as in the earlier submission), however it also contained an additional column headed "Assessment". There is no further explanation of this calculation.

In the report that we prepared (provided to TEC on 19 May 2015), we set out that we have applied the definitions on the NZQA website in distinguishing the breakdown of learning hours between self-directed and teaching hours. The definition of self-directed learning states *"Time spent in studying and doing assignments and undertaking practical tasks"*. We have assumed that anything that is not included in this definition of self-directed learning is teaching hours. This includes time spent in assessment, but obviously not time spent doing assignments, studying or undertaking practical tasks.

In our opinion, this would include time spent in class where there is necessarily no contact time with the teacher because an assessment is being completed. Any time a student spends doing assessments would commonly be part of the self-directed component, but some does take place in class time. Accordingly, calculating additional "assessment time" would be double counting of either teaching or self-directed hours.

In fact, we note that Agribusiness' own description of self-directed learning referred to students *"completing assessments in own time"* – and this was when Agribusiness had calculated a much lower level of self-directed learning than in this most recent calculation.

We did not conduct a student by student assessment of self-directed learning when completing our review, as we accept that it will vary for each student. However, we did discuss with both tutors and students the amount of time that was required outside of class and tutorial time.

In regard to CHIP, we formed a view that it was likely that the approved 120 hours were being completed. In forming this view we applied the definition above that included undertaking practical tasks at home (which Agribusiness has treated as “Directed Learning”) and doing assignments at home (which presumably Agribusiness has included under “Assessment”).

In regard to LBS, we formed the conclusion, based on the information we reviewed, that the required 320 hours were being met. Students described completing between zero and five hours per week (compared to the required 8 hours). Even if you assume five hours per week, this is only 200 hours in total. Most students described completing the academic and practical requirements during the timetabled hours. Further, many LBS students reported a course that was much shorter in duration to that reported to TEC by Agribusiness.

We also note that this 28 August letter from Agribusiness has introduced new definitions of Directed and Self-Directed learning. Agribusiness says that NZQA are apparently in agreement with these definitions. While it would be helpful if we could simply refer to the official NZQA definitions, we do note that these new definitions refer to directed learning as being typically face-to-face. This is consistent with the definition on NZQA’s website that we have applied, being “*Direct contact time with teachers and trainers*”. This does not seem to incorporate the definition that has been put forward by Agribusiness of “Practical applications at home”

In summary, it is our view that this 28 August submission by Agribusiness appears to have double counted or over calculated some of the hours in assessing the total number of learning hours. There is still a lack of supporting evidence for the “directed”, “assessment” and “self-directed hours”.

We set out below an updated analysis of what the total learning hours should be for these programmes based on our analysis of numerous evidence sources, including discussions with several tutors and students. We also note that in all of our calculations we have consistently presented the best case scenario from the perspective of Agribusiness. That is, if multiple cohorts had varying hours, we used the cohort with the largest number of hours as our representative one.

	CHIP	LBS
Learning hours required	700	800
Classes	75	112
Tutorial	25	14
Field Days	24	0
Site Visits	4	0
Flexible Tutor Support	40	40
Directed Learning	-	-
Assessment	-	-
Self-directed learning	120	200
Total	288	366
Total %	41.14%	45.75%

2 September 2015