

**NZ School of Outdoor
Studies (Dive School)**

**Report to the Tertiary
Education Commission**

Confidential

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1. Executive Summary

- 1.1. The Tertiary Education Commission (“TEC”) engaged Deloitte to undertake a focussed review of two programmes delivered by NZ School of Outdoor Studies Limited, trading as the New Zealand School of Commercial Diver Training (the “Dive School”).
- 1.2. Intueri Education Group Limited (“Intueri”) purchased the Dive School from interests associated with Section 9(2)(a) and Section 9(2)(a), Section 9(2)(a), in March 2013 and took over active management of the Dive School in May 2014.
- 1.3. The scope of this review was to investigate whether:
 - a) the programmes were taught in accordance with NZQA approval and TEC funding requirements;
 - b) students enrolled and attended the programmes;
 - c) the SDR data accurately reflects student engagement;
 - d) any subcontractor arrangements are in place with the Dive School (and understanding those agreements); and
 - e) anything else relevant from a compliance perspective.
- 1.4. On 15 February 2016 we provided TEC with a verbal update summarising our preliminary findings for the original scope of our engagement. At that stage, the primary matter we raised was an assessed under-delivery in the learning hours delivered by the Dive School during the 2014 calendar year across both of the programmes we reviewed, which were:
 - PC8449 – Certificate in SSBA Construction Diving to 30m; and
 - PB9740 – Certificate in SSBA Construction Diving to 50m.
- 1.5. Following this update, TEC then extended the scope of our review to cover the delivery of the same two programmes but now covering a six year time period from 2010 to 2015. These two programmes comprised 76% of the total EFTS delivered by the Dive School between 2010 and 2015.
- 1.6. The Dive School also delivered the Certificate in Construction Dive Management (PC4020) between 2010 and 2014 but was not in the scope of our review. This programme consumed almost the entire remaining EFTS (22%) that were delivered by the Dive School during the timeframe of our review. The Dive School did not deliver this programme during 2015 and we understand it will not be delivered during the current calendar year.
- 1.7. The Dive School operates from a campus in Huntly and its full capacity is approximately 120 students per year. Between 2010 and 2015 the Dive School delivered 544 EFTS and received

approximately \$5.2 million of Student Achievement Component (“SAC”) funding (excluding GST).

- 1.8. We note that the number of students recorded in the Dive School’s Single Data Return (“SDR”) submitted to TEC has declined during the most recent two calendar years.

Key findings

Under-delivery of learning hours

- 1.9. The material finding from our review of the Dive School is an assessed under-delivery of the total learning hours delivered to students across the Certificate in SSBA Construction Diving to 30m (PC8449) and Certificate in SSBA Construction Diving to 50m (PC9740)¹. Based on this finding, we recommend that TEC consider whether the Dive School was therefore overfunded for the delivery of these programmes between 2010 and 2014.
- 1.10. We have summarised our assessment of the actual delivery of the learning hours for these two programmes during each of the years we have reviewed. The table has been colour coded to the following percentages of assessed delivery:
- a) Green – above 100% of learning hours recorded in STEO have been assessed as delivered to students;
 - b) Orange – between 70% and 99% of learning hours recorded in STEO for that course have been assessed as delivered to students; and
 - c) Red – below 70% of learning hours recorded in STEO for that course have been assessed as delivered to students.

Table 1: Summary of assessed delivery of learning hours between 2010 and 2015

Year	PC8449 - Scuba to 30m			PC9740 - Scuba to 50m	
	EFTS	Assessed Delivery of Learning Hours		EFTS	Assessed Delivery of Learning Hours
2010	53.03	63.43%		20.30	79.52%
2011	53.87	63.43%		13.65	79.52%
2012	74.91	63.43%		36.66	60.73%
2013	68.18	60.61%		26.12	54.55%
2014	35.76	60.61%		16.50	54.55%
2015	19.80	102.73%		8.80	102.73%

- 1.11. For completeness, we note that both of these programmes were amended through Type 2 Changes, which were approved by the New Zealand Qualifications Authority (“NZQA”) on 13 February 2015. Our assessment is that the delivery of these programmes from this date onwards is in compliance with the programme documents and the data submitted to TEC (in the STEO database).

¹ Section 3.11

Other matters

- 1.12. The Dive School's shareholder, Intueri, engaged Ernst & Young to complete an independent review, which included analysing the validity of SDR reporting and related TEC funding mechanisms. Ernst & Young produced a report dated February 2015, which identified an estimated funding impact between 1 January 2009 and 31 December 2014 of between \$950,000 & \$1.12 million. This related to students who were enrolled and funded but for whom there was no evidence of attendance². Intueri has received further verification of some student's enrolments from ADAS.
- 1.13. It was not within our scope to review or verify Ernst & Young's approach or work however we do comment on their findings. TEC may wish to consider whether the report discloses any issues that require a funding reimbursement from the Dive School.
- 1.14. Overall, we were satisfied that in the sample we selected, the underlying student records support the 2015 enrolment data. We did not review enrolment records for students enrolled during 2014, as this was addressed in the report prepared by Ernst & Young.
- 1.15. We were advised that the Dive School did not subcontract delivery of either of the programmes to external providers between 2010 and 2015, although some of the tutors were contractors rather than employees during this timeframe.

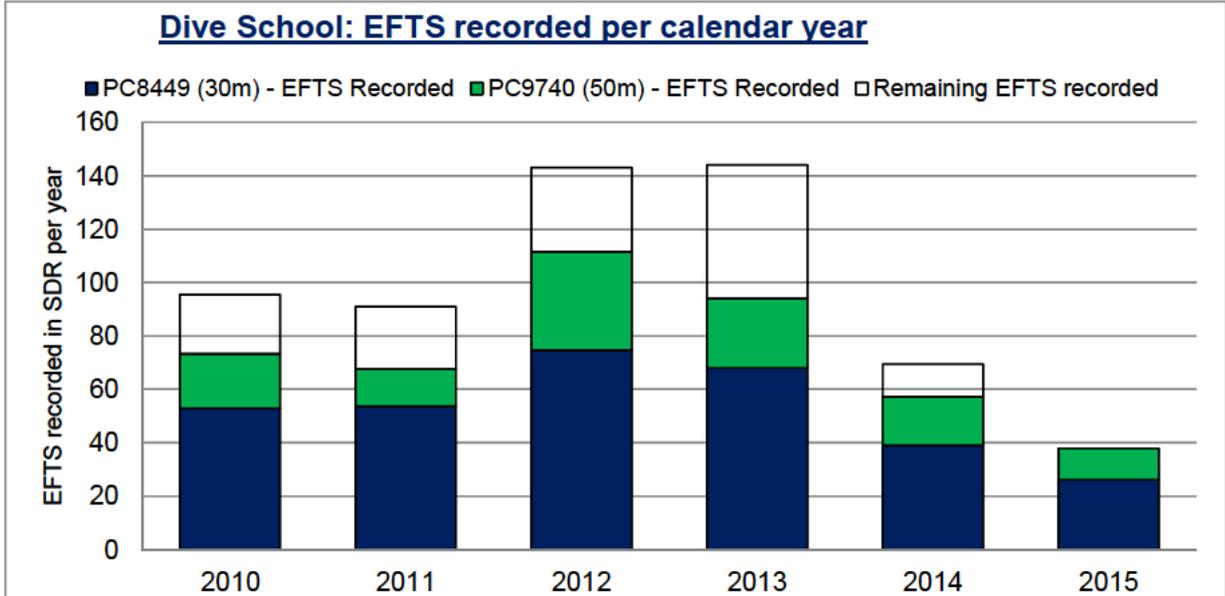
² Section 4.13

2. Introduction

Background

- 2.1 The Dive School is a Private Training Establishment as defined in the Education Act 1989.
- 2.2 The Dive School is New Zealand’s only commercial diver training provider and primarily delivers two programmes, which involve students diving to a depth of 30 metres; and then to a depth of 50 metres. All of the programmes the Dive School delivers are accredited by the Australian Diver Accreditation Scheme (“ADAS”), which is an internationally recognised accreditation for commercial diving.
- 2.3 TEC engaged Deloitte to undertake a focussed review of the following two programmes delivered by the Dive School:
 - (a) **PC8449** – Certificate in SSBA Construction Diving to 30 Metres
 - (b) **PC9740** – Certificate in SSBA Construction Diving to 50 Metres
- 2.4 The scope of the review was initially for the two year period 2014 & 2015. However, this was extended to an investigation of the delivery during the six year period 2010 to 2015.
- 2.5 The value of delivered EFTS recorded in the Dive School’s annual single data return (SDR) under these programmes has fluctuated during the time period we have reviewed.

Chart 1: EFTS delivered under programmes within scope of this review³



³ Including International fee-paying students

2.6 The Dive School's SDRs record a materially higher level of delivery during 2012 and 2013. We note that some comments were made in a February 2015 report, prepared by Ernst & Young, in which it was stated that the years when student records and course enrolments were unable to be substantiated by supporting documentation were concentrated during the 2012 and 2013 calendar years⁴. This may partially explain the uplift in EFTS that were funded during these years.

2.7 The actual SAC funding received by the Dive School since 2010, based on its SDR data returns to TEC, is set out in the following table:

Table 2: SAC funding received by the Dive School (programmes within scope only)

Programme	2010	2011	2012	2013	2014	2015	Total
SSBA Diving to 30 Metres (PC8449)	459,179	484,434	673,685	645,370	355,380	196,782	\$2,814,830
SSBA Diving to 50 Metres (PC9740)	165,343	113,636	329,719	247,281	163,965	87,462	\$1,107,406
Total	\$624,522	\$598,070	\$1,003,404	\$892,651	\$519,345	\$284,244	\$3,922,236

2.8 The Confirmation of Investment Plan Funding letter, dated 4 December 2014, records that the Dive School was approved for SAC funding of \$1,414,019 (excl. GST) during the 2015 calendar year. We note that the total amount delivered by the Dive School during 2015 was \$284,245, which is substantially lower than the approved funding amount⁵.

Ownership and management

2.9 The Companies Office records that the Dive School was incorporated on 21 September 2000 and that, from 29 November 2005 to March 2013, the company's shares were held by interests associated with:

(a) Section 9(2)(a) Section 9(2)(a) and Section 9(2)(a) (50% jointly); and

(b) Section 9(2)(a) Section 9(2)(a) the Section 9(2)(a) and Section 9(2)(a) (50%).

2.10 We were advised by Intueri that Section 9(2)(a) was responsible for Dive School operational matters and that Section 9(2)(a) was responsible for reporting of the SDR during this period.

2.11 On 28 March 2013, 100% of the company's shares were transferred from the previous shareholders to Intueri Education Group Limited. One of the previous shareholders, 9(2)(a) 9(2)(a) was contracted to run the Dive School for 12 months following the acquisition (until April 2014).

⁴ Section 1.4 – Ernst & Young Report, February 2015

⁵ 8449 – DW, NZOS 2015 delivery by qualification as at 24 Mar 2016 (provided by TEC)

- 2.12 Dive School staff advised us that Intueri's Academic and Quality Assurance Support Director frequently visits the campus and that Intueri provides administrative and information systems support. We also note that the Dive School has recently recruited a new College Director. This role had been performed by the Dive School's Operations Manager between April 2014 (when Section 9(2)(a) left the organisation) and December 2015.
- 2.13 Intueri advised us that after Section 9(2)(a) left his contract role, in mid-2014, they found that procedures in the Dive School had changed to meet ADAS requirements but were not aligned with the NZQA approved programme. The Dive School used this knowledge to amend its qualifications at the end of 2014, which resulted in a reduction of the teaching weeks and hours and discontinuing the delivery of one programme.
- 2.14 Alongside this procedural work, the Dive School's enrolment and SDR returns were analysed internally. Anomalies in respect of names entered on returns submitted to the TEC could not be validated. We were advised by Intueri that this led to a discussion between the Dive School, Intueri and TEC. Intueri engaged Ernst & Young to complete an independent review for the period 1 January 2009 to 31 December 2014 to clarify the impact on funding and assess whether the performance of the Dive School was in line with regulatory and quality standards. This included reviewing the validity of SDR reporting, reconciling student payments and the use of the Public Trust facility, and reviewing adherence to other relevant academic and quality standards.
- 2.15 From our discussions with Intueri and the Dive School, it appears as though Intueri recognised that the Dive School had potential historic issues in respect of its SDR reporting and adherence to academic quality standards, and took steps to address those issues.

Scope of this report

- 2.16 TEC engaged Deloitte to undertake a focused review of the Certificate in SSBA Construction Diving to 30m (PC8449) and Certificate in SSBA Construction Diving to 50m (PC9740). The purpose of this review was to establish whether the delivery of these programmes during 2014 and 2015 was compliant with the NZQA's and TEC's programme and funding approval. This included investigating whether:
- a) the programmes were taught in accordance with NZQA approval and TEC funding requirements;
 - b) students enrolled and attended the programmes;
 - c) any subcontractor arrangements are in place with the Dive School (and understanding those agreements);
 - d) the SDR data accurately reflects student engagement; and
 - e) anything else relevant from a compliance perspective.
- 2.17 Following our preliminary findings, TEC instructed us to extend the scope of our review to investigate the delivery of the two programmes for the six year period 2010 to 2015.

Limitations of this Report

- 2.18 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.
- 2.19 The financial and other information contained in this report have been provided by the Dive School, TEC, NZQA and various Dive School 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.
- 2.20 The Dive School delivered the Certificate in Construction Dive Management (PC4020) between 2010 and 2014. This programme was not included in our review.

3. Compliance with NZQA Approval and TEC Funding Requirements

3.1 In this section we set out our findings on whether or not the programmes:

- a) Were taught in accordance with the programme documents and TEC's funding requirements between 2010 to 2015; and
- b) Comply with the learning hours and weeks entered by the Dive School into the TEC database "STEO".

Compliance with Teaching Weeks, Hours and Sites

3.2 We have set out below the required hours under the Programme Documents and the hours that are submitted by the Dive School into STEO, which is TEC's database that funding calculations are based on. We have then reconciled the learning hours recorded in each document to determine whether there are any differences between the programme documents and STEO.

Programme Alignment with Approval and Funding Requirements

3.3 A comparison of the learning hours recorded in the programme documents and STEO is set out in the following table. At the date of our review, the latest version of the programme documents reconciled with the hours that had been entered into STEO.

Table 3: Programme Document and STEO Learning Hours Reconciliation

Programme	Date approved by Academic Board	Programme Document	STEO (TEC)	Does STEO reconcile?
Certificate in SSBA Construction Diving to 30m Level 4 66 credits (PC8449)	NZQA Approval 30 October 2009. Type 2 Change 13 February 2015 <i>(reducing duration from 18 to 12 weeks; and credits from 101 to 66)</i>	Duration: 12 weeks Teaching: 40 / week (480 hours total) Self-directed: 15 / week (180 hours total) Total hours: 660 hours	Duration: 12 weeks Teaching: 40 / week (480 hours total) Self-directed: 15 / week (180 hours total) Total hours: 660 hours	Yes
Certificate in SSBA Construction Diving to 50m Level 4 42 - 55 credits (PC9740)	Type 2 Changes 21 December 2010 and 27 June 2011 <i>(changes to modules)</i> Type 2 Change 13 February 2015 <i>(reducing duration from 10 to 8 weeks; and credits from 55 to 44)</i>	Duration: 8 weeks Teaching: 40 / week (320 hours total) Self-directed: 15 / week (120 hours total) Total hours: 440 hours	Duration: 8 weeks Teaching: 40 / week (320 hours total) Self-directed: 15 / week (120 hours total) Total hours: 440 hours	Yes

3.4 Both of the programmes we reviewed were the subject of recent Type 2 Changes, which approved the alteration of delivery from February 2015. We have reviewed correspondence from the New Zealand Qualifications Authority (“NZQA”) which records that:

- The Dive School submitted applications dated 8 December 2014 to NZQA for the approval of Type 2 Changes to the approved programme documents for both of the courses that were within the scope of this review;
- The changes included the:
 - Reduction in number of credits required for each programme; and
 - Reduction in duration of weeks for each programme; and
- The applications were approved by the NZQA, which was communicated to the Dive School via two letters dated 13 February 2015.

Duration and Learning Hours Analysis

3.5 We have been advised by TEC that an important part of the funding provided to Tertiary Education Providers is based on the total learning hours delivered to the student (approximately 1,200 hours per year for a full time course). This is reflected in rule SAC036.

3.6 The learning hours for the programmes we reviewed are comprised of teaching hours and self-directed hours. Our review focussed on both of these components and relied primarily on course timetables, tutor interviews and student interviews.

3.7 We note that 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. We have relied on the highest estimates provided by students when considering the level of self-directed study that students were required to undertake. This is a conservative approach, as it increases the volume of hours we have assessed as being delivered to students.

3.8 Course documents, students and tutors regularly referred to the programmes as:

- a) **PC8449 – Certificate in SSBA Construction Diving to 30m:** ADAS “Part 1” & “Part 2”.
- b) **PC9740 – Certificate in SSBA Construction Diving to 50m:** ADAS “Part 3”.

3.9 Each “Part” has been delivered sequentially to students during a block of weeks and consisted of theory and practical study. The duration of each “Part” fluctuated between 2010 and 2015.

3.10 In summary, our assessment of the delivered learning hours has calculated a significant under-delivery for both of the programmes between 2010 and 2014.

3.11 However the delivery of the courses was consistent with the STEO hours recorded after the Type 2 changes dated 13 February 2015. These Type 2 Changes materially altered the expected delivery for both of the courses we reviewed. Accordingly, we have set out our analysis for each calendar year separately in Table 4:

3.12 The table has been colour coded to the following percentages of assessed delivery:

- a) Green – above 100% of learning hours recorded in STEO have been assessed as delivered to students;
- b) Orange – between 70% and 99% of learning hours recorded in STEO for that course have been assessed as delivered to students; and
- c) Red – below 70% of learning hours recorded in STEO for that course have been assessed as delivered to students.

Table 4: Assessed learning hours delivered

PC8449 (\$SBA to 30m)					
Year	Credits Duration	EFTS delivered	Hours recorded in STEO	Actual delivery	Compliant
2010	101 credits 18 weeks	53.03	Duration: 18 weeks Teaching: 40 / week (720 total) Self-directed: 15 / week (270 total) Total: 990 hours	Duration: 6 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (504 hours total) Self-directed: 14 hours / week during course + 1 week of fulltime self-directed study between Part 1 and Part 2 (124 hours total) Total: 628 hours	63.43%
2011	101 credits 18 weeks	53.87	Duration: 18 weeks Teaching: 40 / week (720 total) Self-directed: 15 / week (270 total) Total: 990 hours	Duration: 6 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (504 hours total) Self-directed: 14 hours / week during course + 1 week of fulltime self-directed study between Part 1 and Part 2 (124 hours total) Total: 628 hours	63.43%
2012	101 credits 18 weeks	74.91	Duration: 18 weeks Teaching: 40 / week (720 total) Self-directed: 15 / week (270 total) Total: 990 hours	Duration: 6 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (504 hours total) Self-directed: 14 hours / week during course + 1 week of fulltime self-directed study between Part 1 and Part 2 (124 hours total) Total: 628 hours	63.43%
2013	101 credits 18 weeks	68.18	Duration: 18 weeks Teaching: 40 / week (720 total) Self-directed: 15 / week (270 total) Total: 990 hours	Duration: 8 weeks (5 days per week) Teaching: 60 hours / week (480 hours total) Self-directed: 15 hours / week (120 hours total) Total: 600 hours	60.61%
2014	101 credits 18 weeks	35.76	Duration: 18 weeks Teaching: 40 / week (720 total) Self-directed: 15 / week (270 total) Total: 990 hours	Duration: 8 weeks (5 days per week) Teaching: 60 hours / week (480 hours total) Self-directed: 15 hours / week (120 hours total) Total: 600 hours	60.61%
2015	66 credits 12 weeks	19.80	Duration: 12 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (180 total) Total: 660 hours	Duration: 12 weeks (5 days per week) Teaching: 42.5 hours / week (510 hours total) Self-directed: 14 hours / week (168 hours total) Total: 678 hours	102.73%

PC9740 (\$SBA to 50m)					
Year	Credits Duration	EFTS delivered	Hours recorded in STEC	Actual delivery	Compliant
2010	42 credits 12 weeks	20.30	Duration: 12 weeks Teaching: 25 / week (300 total) Self-directed: 10 / week (120 total) Total: 420 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self-directed at 40 hours (82 hours total) Total: 334 hours	79.52%
2011	42 credits 12 weeks	13.65	Duration: 12 weeks Teaching: 25 / week (300 total) Self-directed: 10 / week (120 total) Total: 420 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self directed between Part 2 and Part 3 (82 hours total) Total: 334 hours	79.52%
2012	55 credits 10 weeks	36.66	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self directed between Part 2 and Part 3 (82 hours total) Total: 334 hours	60.73%
2013	55 credits 10 weeks	26.12	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 4 weeks (5 days per week) Teaching: 60 hours / week (240 hours total) Self-directed: 15 hours / week (60 hours total) Total: 300 hours	54.55%
2014	55 credits 10 weeks	16.50	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 4 weeks (5 days per week) Teaching: 60 hours / week (240 hours total) Self-directed: 15 hours / week (60 hours total) Total: 300 hours	54.55%
2015	44 credits 8 weeks	8.80	Duration: 8 weeks Teaching: 40 / week (320 total) Self-directed: 15 / week (120 total) Total: 440 hours	Duration: 8 weeks (5 days per week) Teaching: 42.5 hours / week (340 hours total) Self-directed: 14 hours / week (112 hours total) Total: 452 hours	102.73%

* *Unfunded international students have been excluded from the EFTS delivered in this table*

Assessed actual delivery of programmes between 2010 and 2012

- 3.13 In our assessment there was a material under-delivery of learning hours provided to students during the 2010 to 2012 period. During this period the programmes were delivered in a significantly compressed manner. For example the Scuba Diving to 30m programme was described in the programme documents as an 18 week programme, however, was actually delivered during a 6 or 7 week intensive period. Even though students were required to attend classes for a substantially longer daily duration (up to 84 hours per week – see below), the truncated number of weeks the course was delivered across effectively created a significant under-delivery of learning hours.
- 3.14 Our assessment of the learning hours delivered to students between 2010 and 2012 relies on three interviews we conducted with two current tutors and one student that taught and studied at the Dive School during the timeframe.
- 3.15 We were informed by the interviewees that each “Part” of the programmes was delivered during a three week block. During this time, students studied every day of the week and were in contact with tutors for approximately 12 hours per day. The interviewees advised us that the reasoning behind delivering the programme with long teaching days and no days off was to simulate what working in a commercial diving operation would be like. Accordingly, we calculated the teaching hours delivered during this period as 84 hours per week (12 hours x 7 days per week).
- 3.16 The self-directed component of the programme was delivered in addition to the teaching hours. The interviewees generally stated that this would be a “*couple of*” hours per night. We have

assumed that each student completed two hours of self-directed study per night on average (or 14 hours a week) for the purpose of our calculation.

- 3.17 We note that this assessment of teaching and self-directed hours calculates a 14 hour period of study every day, with no weekend breaks, throughout the duration of the course. This means that we have assumed that the learning hours delivered per week exceed the approved delivery; however the total learning hours are less than the total approved due to the truncated timeframe.
- 3.18 Additionally, one student, who studied both programmes during 2011, advised us that there was a week of self-directed study undertaken between each “Part” of the programme. This time was in addition to the three weeks of teaching hours. We note that this week of self-directed study was not referred to by the tutors. However, we have included it in our assessment of delivered learning hours. This is conservative, as it increases the level of actual delivery provided under these programmes and the evidence supporting the provision of these hours is limited to one interview. For the purpose of our assessment, we have assumed that one fulltime week (40 hours) was delivered to students during each of the programmes (one week between Part 1 and 2; one week prior to commencement of Part 3).
- 3.19 We have also included this week of self-directed study in our assessment of the programmes delivered during 2010 (i.e. before the student’s period of study). This is despite the tutors not mentioning it during their interviews. However, we note that the tutors did not mention a change of delivery of the programmes between 2010 and 2011. We have included this week of self-directed learning to be consistent, despite the lack of evidence. We note that this is extremely conservative as it increases the delivery of self-directed hours by 40 for both programmes.
- 3.20 We requested course start and end date timetables for the delivery of the programmes between 2010 and 2012, however, did not receive copies of timetables for these years.
- 3.21 The Certificate in SSBA Construction Diving to 50m was altered though “Category 2” changes, which were approved by NZQA on 27 June 2011. The following alterations were made to the required delivery of the programme:
- a) The level of the programme was increased to level 5;
 - b) The duration of the programme was reduced from 12 to 10 weeks;
 - c) Total learning hours per week increased from 35 to 55 hours per week; and
 - d) Changes in credit values were made to modules 3502, 3505 and 3507.
- 3.22 The interviews we conducted with tutors that were involved with the delivery of this programme prior to these changes being made (i.e. 2010 and earlier) did not raise any changes in the method and hours the programme was delivered under prior to these changes. Accordingly, we have assumed the actual delivery of the course did not change, and have made the full allowance for the learning hours that were delivered during 2011 and onwards for this year.

Assessed actual delivery of programmes during 2013 and 2014

- 3.23 We were advised that the delivery of the programmes changed early in the 2013 year, from 7 days to 5 days of contact time per week. The duration of each “Part” was increased from 3 to 4

weeks. The course timetables we received supported the description of 4 weeks of contact time for each "Part".

- 3.24 Our assessment of the learning hours delivered to students during 2013 and 2014 relies on interviews with four tutors and ten randomly selected students; and class timetables provided to us by the Dive School. The answers provided to us throughout the interviews were reasonably consistent and were supported by the class timetables.
- 3.25 Students generally described the contact time with tutors as between 8 and 10 hours per day. Some students estimated that classes could be up to 12 hours per day on occasion. The explanation for the varying answers seemed to be that cohorts with a larger class size usually took a slightly longer time to get through dives as more people needed to spend time decompressing. The tutors estimated up to 12 hours of contact time per day during these years.
- 3.26 Our assessment of the delivered learning hours has assumed that each contact day with students was 12 hours per day, which is 60 teaching hours per week. We note that this is the maximum amount estimated by a student and that is therefore a conservative estimate.
- 3.27 We interviewed five students and asked them about the self-directed study⁶ required. The highest estimate provided by a student was 15 hours a week, although most of the students referred to a "couple hours" of study a night. We have assumed that students were required to complete approximately 15 hours of self-directed study per week.
- 3.28 None of the students or tutors referred to a week of self-directed study between the parts of the programmes it is not recorded in the timetables we received for these years. Consequently, we have not made an allowance for this time in our assessment of hours delivered during 2013 and 2014.
- 3.29 Intueri were provided with the opportunity to comment on our assessment of the learning hours that were actually delivered to students, summarised in Table 4, prior to the finalisation of this report. Intueri advised that it felt a more consistent approach to the treatment of self-directed study during 2013 and 2014 for the Certificate in SSBA Construction Diving to 50m (PC9740) would be to assess the self-directed study for these years at 82 hours.
- 3.30 We have not made this change to our assessment of the self-directed hours that were actually delivered. Our assessment is based on the highest estimate provided by students that we interviewed, which was 15 hours per week. We also note that this is consistent with the 15 self-directed hours per week that are recorded in STEO. In our view, the student interviews are the most robust source of evidence for the actual delivery of self-directed study, and we have relied on the highest estimate that was provided by students in each year.
- 3.31 Finally, we note that our assessment of self-directed learning hours delivered between 2010 and 2012 includes a conservative allowance of an extra week of self-directed study between each Part⁷. The student interviews, tutor interviews and timetables for 2013 and 2014 did not provide evidence of this week of self-directed study being undertaken by students. In our view, it would not be consistent to include an additional 22 hours of self-directed study in 2013 and 2014 without evidence that supports these learning hours were actually delivered.

⁶ Note that in our interviews with students we don't use jargon such as "self-directed study"

⁷ Refer paragraphs 3.18 and 3.19

3.32 However, we have included an alternate assessment of the learning hours delivered under the Certificate in SSBA Construction Diving to 50m (PC9740) at **Appendix C** that reflects what the assessment of the delivered learning hours would have been if we did accept Intueri's recommendation.

Assessed actual delivery of programmes during 2015 calendar year

3.33 Both of the programmes were then altered through Type 2 changes, which were approved by NZQA on 13 February 2015. The tutor and student interviews; and course timetables we reviewed for the 2015 calendar year describe a substantially different format of delivery during this year. In summary, these changes are a:

- a) Reduction in number of credits required for each programme; and
- b) Reduction in duration of weeks for each programme.

3.34 Our assessment of the learning hours delivered to students during 2015 relies on interviews with four tutors and five randomly selected students.

3.35 The interviewees described the programmes as:

- PC8449 – 12 weeks, this covered “Part 1” and “Part 2. Each “Part” lasted six weeks.
- PC9740 – 8 weeks, this covered “Part 3”.

3.36 We were advised that classes were Monday to Friday during 2015. Students reported a minor degree of variation in respect of the hours per day, which appeared to be driven by the number of students that were enrolled in the cohort. Larger classes usually required more time for students to decompress from dives. The highest estimates of teaching hours were 8.5 hours per day and we have relied on this amount for the purpose of our assessment.

3.37 Finally, we observe that we have assessed a higher amount of actual learning hours delivered to students during 2015 than in earlier years, even though the learning hours required for each programme reduced.

Summary

3.38 Our findings in relation to the compliance with NZQA approval and TEC funding requirements for the Certificate in Construction Diving to 30m and Certificate in Construction Diving to 50m are that:

- a) The hours entered into STEO were consistent with the NZQA approval documents between 2010 and 2015;
- b) There was an assessed under-delivery of learning hours delivered to students enrolled in the Certificate in Construction Diving to 30m and Certificate in Construction Diving to 50m between 2010 and 2014. During this timeframe the programmes were not taught in compliance with NZQA approval documents or TEC funding requirements; and
- c) Type 2 changes were approved by NZQA altering the delivery of the Certificate in Construction Diving to 30m and Certificate in Construction Diving to 50m in February 2015. During 2015 the delivery of these programmes was changed to a format consistent with the NZQA approval documents and TEC funding requirements.

4. Verification of Existence of Students and Student Data

- 4.1 In this section we set out the findings from our review of the underlying enrolment records that the Dive School holds for 36 randomly selected students that were enrolled during 2015. The objective of our testing was to determine whether the Dive School held evidence of:
- (a) Sufficient underlying enrolment and assessment records for each student, confirming their existence and eligibility to enrol; and
 - (b) Accurate reporting of completion of unit standards and qualifications to NZQA and TEC.

Enrolment Eligibility and Verification of Records

Results from testing

- 4.2 We requested documentation supporting the enrolment of 36 students that studied at the Dive School during the 2015 calendar year. Some student's records are included in both programmes we reviewed, as they studied both qualifications offered by the Dive School during 2015. For each of these students, we requested the student's:
- (a) NSN number;
 - (b) Enrolment form and appropriate information to support the enrolment;
 - (c) Assessment records to support the qualification completion;
 - (d) Information supporting the date the qualification was awarded, and when the certificate was received; and
 - (e) Any other relevant records from the student management system.
- 4.3 We have summarised our findings as:

Table 5: Summary of enrolment review

Programme	Documents supporting enrolment (passport etc.)	Details reconcile in SMS and TEC	Course dates reconcile SMS and TEC	Completions and standards reported
Certificate in SSBA Construction Diving to 30m (PC8449)	✓ 35/35 records	✓ No issues	✓ No issues	✓ No issues
Certificate in SSBA Construction Diving to 30m (PC9740)	✓ 13/13 records	✓ No issues	✓ No issues	✓ No issues

Supporting documentation

4.4 We received an enrolment pack for each sample student, which included:

- (a) Signed enrolment form;
- (b) Verification document (birth certificate, passport etc.); and
- (c) NZQA Record of Achievement.

4.5 The enrolment forms include a section in which the applicant is required to provide documentation supporting their enrolment as a domestic student. Most of the enrolments in our sample provided examples of New Zealand birth certificates, New Zealand passports and overseas passports with residency stamps. The Dive School provided us with documents evidencing the fact that the remaining two enrolment forms had been verified to confirm they were valid domestic enrolments.

Details reconcile between enrolment form and TEC

4.6 For each sample we reviewed, the enrolment data in the SDR submitted to TEC matched the underlying NSN number in the enrolment records. We also note that all of the 2015 enrolments we reviewed were included in a 2015 SDR.

4.7 We also reconciled the programme start dates recorded on the enrolment forms against the start dates that have been entered into the Dive School's SDR for each of the students we reviewed. The purpose of this reconciliation was to ensure that the dates that funding was claimed for, for each student, aligned with the student's recorded time on enrolment forms.

4.8 Nearly all of the dates were exact matches, with the greatest variance being one day (e.g. the enrolment form recorded a start date of 1 June 2015 and STEO recorded a start date of 2 June 2015).

4.9 Accordingly we are satisfied based on the randomly selected student sample, that there were no material issues in respect of the dates entered in Dive School's SDR for funding purposes..

Completions and standards reported

4.10 We also reconciled the courses that have been recorded as complete in the Dive School's student management system for each student against the courses that have been reported to TEC for funding purposes. The purpose of this test was to determine whether there were any students that had been reported as participating in programmes to TEC but were not recorded as enrolled in the student management system.

4.11 The 36 randomly chosen student's enrolments in the student management system all reconciled with TEC's records.

Previous review – February 2015

- 4.12 Intueri engaged Ernst & Young to complete an independent review of the Dive School in order to determine the validity of SDR reporting, reconcile student payments and the use of the Public Trust facility, and review adherence to other relevant academic and quality standards. The Ernst & Young review covered Dive School enrolments for the period 1 January 2009 to 31 December 2014.
- 4.13 We have read the final version of the Ernst & Young report, dated February 2015. It is outside the scope of our engagement to validate Ernst & Young’s findings and methodology. However, the findings are relevant to our scope and we summarise these here. The report identified that there were students who were funded by TEC but for whom there was no evidence that they attended the Dive School at all, or no evidence that they attended a particular course.
- 4.14 In some cases, the students who were not able to be matched to student records were able to be identified by the tutors. The report set out the potential overfunding impact as follows:

Table 6: Ernst & Young report - potential funding impact

	\$ funded	No. of students	EFTS
a Students not matched to student records	\$368,015	59	40.4759
<u>Less</u> students identified by tutors	\$(79,648)	(14)	
<i>Net students not validated</i>	<i>\$288,367</i>	<i>45</i>	<i>31.6863</i>
b Courses not validated	\$760,320	61	82.7596
<u>Less</u> identified by tutors	\$(96,960)	(15)	
<i>Net courses not validated</i>	<i>\$663,360</i>	<i>46</i>	<i>72.4427</i>

- (a) Student records and course enrolments were unable to be substantiated by the “information hierarchy”. In total, 45 students that were enrolled between 2009 and 2014 could not be validated, which equated to 31.6863 EFTS of funding⁸. There were a further 14 students for whom there were no supporting records but tutors were able to identify them; and
- (b) Students were enrolled in courses for which there is no evidence of attendance or completion. In total, 46 course records were unable to be supported by the information established in the “information hierarchy”, which equated to 72.4427 EFTS of funding⁹. A further 15 courses were only validated by identification of a tutor.

- 4.15 In summary, Ernst & Young’s report identified material concerns relating to the validity of Dive School student enrolments between 2009 and 2014 and the funding of courses that were

⁸ Section 2.1.2 – Ernst & Young Report, February 2015

⁹ Section 2.1.3 – Ernst & Young Report, February 2015

actually delivered to students compared to what was claimed and submitted to TEC. The estimated total overfunding based on comparison to student records only was \$1,128,335¹⁰. After deduction of those students and courses identified by tutors, the “residual overfunding” was calculated by Ernst & Young at \$951,727.

- 4.16 We note that the majority of these enrolments appear to have been processed during 2012 and 2013, which was the timeframe a previous shareholder managed the Dive School. Intueri were undertaking further validation steps so they did not consider these figures to be final. Intueri received validation evidence from ADAS in relation to analysis contained in the Ernst & Young Report. Intueri advised us that it believed the un-validated EFTS in the Ernst & Young Report should be adjusted from 123.2 EFTS to 102.2 EFTS.
- 4.17 We are not in a position to comment on whether this reduction is appropriate as we were not engaged to review Ernst & Young’s report and we have not verified the accuracy of the further validation undertaken by ADAS.
- 4.18 TEC may wish to consider whether the matters set out in Ernst & Young’s report should be considered further.

¹⁰ \$368,015+\$760,320

Appendices

Appendix A

Programme Documents

13 February 2015

MoE Number: 8449

Section 9(2)(a)

Academic Manager
New Zealand School of Outdoor Studies Limited
Trading as NZ School of Commercial Diver Training
P O Box 83
Huntly 3740

Dear **Section 9(2)(a)**

NZQA Reference: C17987

Application for Programme Change - Certificate in SSBA Construction Diving to 30m

Thank you for your application dated 08 December 2014 for approval of Type 2 changes to the above approved programme.

The New Zealand Qualifications Authority (NZQA) has assessed this application and the changes have been approved.

The changes include:

Reduction in credit value from 101 to 66, reduction in duration from 18 weeks to 12 weeks.

The changes will enhance the work-readiness and practical competence of graduates through more intensive contact time in practical training, by increasing the ratio of contact to self-directed learning time; integrating theoretical knowledge with practical application in dive related tasks and learning activities; and an increase in the ration of training time in the water.

The programme title is approved as:

Certificate in SSBA Construction Diving to 30m

The revised programme leads to the following qualification(s):

Certificate in SSBA Construction Diving to 30m

The enclosed Programme and Qualification Details Report includes the approved details for this programme. Any changes to these details require prior approval from NZQA.

The approved programme title is now listed on the NZQA website. The above qualification(s) will be listed on the New Zealand Qualifications Framework (www.nzqf.govt.nz).

If you intend applying to the Tertiary Education Commission (TEC) for Student Achievement Component funding, you will need to enter the programme details as shown on the attached Programme and Qualifications Details Form on the TEC's STEO website (www.steo.govt.nz). Contact TEC for further information regarding funding application processes (www.tec.govt.nz).

Your organisation may make the following statement in publications and in publicity material:

"The programme is approved by the New Zealand Qualifications Authority under the provisions of the Education Act 1989, and New Zealand School of Outdoor Studies Limited Trading as NZ School of Commercial Diver Training is accredited to teach it."

and/or

"Kua whakamanahia tēnei akoranga o Te Mana Tohu Mātauranga o Aotearoa i raro i te wāhanga 249 o te Ture Mātauranga 1989, ā, kua whakamanahia a New Zealand School of Outdoor Studies Limited Trading as NZ School of Commercial Diver Training ki te whakarato i taua akoranga i raro i te wāhanga 250 o te Ture."

Continued approval and accreditation assumes that your organisation is maintaining or improving the policies and procedures you have documented and demonstrated to NZQA. Please advise NZQA immediately if there are significant changes to these policies and procedures.

Programme approval and accreditation will be reviewed as part of your self-assessment and external evaluation review.

Please contact **Section 9(2)(a)** – Approvals and Accreditation, phone **Section 9(2)(a)** or email **Section 9(2)(a)** if you have any queries.

Yours sincerely



Section 9(2)(a)

Manager

Approvals and Accreditation

Quality Assurance Division

R0482 Programme Details



Programme Overview

Programme number 112372
Title Certificate in SSBA Construction Diving to 30m
Type Certificate
Owner New Zealand School of Outdoor Studies Limited (8449)
Level 04
Total credits 66
Total learning hours 660

Aim The certificate in SSBA Construction Diving to 30m aims to develop the skills necessary to safely operate in the on shore commercial dive sector and deliver the requisite certifications to meet the regulatory requirements for gaining an initial certificate of competence to work as an occupational diver in New Zealand.

Content The course directly delivers the requirements to achieve Australian Diver Accreditation Scheme (ADAS) Parts 1 and 2 certification and gain a Department of Labour Certificate of Competence necessary to work as a commercial diver in New Zealand for which ADAS certification is a prerequisite. This includes internationally recognised Diver Alert Network oxygen supply and first aid requirements. The focus is safety and competence in SSBA diving with commercial applications and skills introduced progressively including communications equipment and protocol, underwater maintenance and construction projects, use of tools and equipment underwater (hand, pneumatic, hydraulic and power), search, recovery, rescue and dealing with air supply, compression/ decompression issues and emergencies. Practical experience is inherent in the course content and workplace projects may also be included.

Outcome On completion of this qualification, graduates will hold the internationally recognised Australian Diver Accreditation Scheme Part 1 and Part 2 Commercial Diver accreditation and Diver Alert Network Oxygen Supply and First Aid certifications, thus meeting the requirements for initial award of a Department of Labour Certificate of Competence. Graduates are able to work as construction divers to a depth of 30 metres using surface Supply Breathing Apparatus, can safely conduct construction and commercial diving tasks at depth with a range of equipment and can effectively manage the risk inherent in these activities.

Entry requirement To gain entry to the Certificate in SSBA Construction Diving to 30 m, in addition to the minimum entry requirements, applicants must be at least 18 years of age, hold a current open water dive card or be able to demonstrate equivalent knowledge and have completed a minimum of 10 scuba dives in the last 6 months. Contact the provider for further details of the minimum requirements for all SSBA courses.

Standards

There are no standards associated with this programme

Qualifications

Qualification(s) completed as part of this programme:

Number	Title	Level	Credits
PC8449	Certificate in SSBA Construction Diving to 30m - NZ School of Commercial Diver Training	4	101

Delivery and Assessment

Provider New Zealand School of Outdoor Studies Limited (8449/1)

Delivery mode type Face-to-Face

Delivery method Unchanged.

Assessment Method Unchanged

Programme length

Total length 12 Including holiday weeks

Teaching weeks 12 Excluding holiday weeks

13 February 2015

MoE Number: 8449

Section 9(2)(a)

Academic Manager
New Zealand School of Outdoor Studies Limited
Trading as NZ School of Commercial Diver Training
P O Box 83
Huntly 3740

Dear **Section 9(2)(a)**

NZQA Reference: C17988

Application for Programme Change - Certificate in SSBA Construction Diving to 50m

Thank you for your application dated 08 December 2014 for approval of Type 2 changes to the above approved programme.

The New Zealand Qualifications Authority (NZQA) has assessed this application and the changes have been approved.

The changes include:

Reduction of the credit value from 55 to 44, and reduction in the duration of the programme from 10 to 8 weeks.

The reasons for the change include; reflecting a more realistic and effective training time as required to enhance the work readiness and practical competence of graduates. There is a reduction in classroom time and an increase in time in the water by more integration of theory with practical learning. The balance of contact to self-directed learning time is increased to provide more intensive contact time on practical outcomes.

The programme title is approved as:

Certificate in SSBA Construction Diving to 50m

The revised programme leads to the following qualification(s):

Certificate in SSBA Construction Diving to 50m

The enclosed Programme and Qualification Details Report includes the approved details for this programme. Any changes to these details require prior approval from NZQA.

The approved programme title is now listed on the NZQA website. The above qualification(s) will be listed on the New Zealand Qualifications Framework (www.nzqf.govt.nz).

If you intend applying to the Tertiary Education Commission (TEC) for Student Achievement Component funding, you will need to enter the programme details as shown on the attached Programme and Qualifications Details Form on the TEC's STEO website (www.steo.govt.nz). Contact TEC for further information regarding funding application processes (www.tec.govt.nz).

Your organisation may make the following statement in publications and in publicity material:

"The programme is approved by the New Zealand Qualifications Authority under the provisions of the Education Act 1989, and New Zealand School of Outdoor Studies Limited Trading as NZ School of Commercial Diver Training is accredited to teach it."

and/or

"Kua whakamanahia tēnei akoranga e Te Mana Tohu Mātauranga o Aotearoa i raro i te wāhanga 249 o te Ture Mātauranga 1989, ā, kua whakamanahia a New Zealand School of Outdoor Studies Limited Trading as NZ School of Commercial Diver Training ki te whakarato i taua akoranga i raro i te wāhanga 250 o te Ture."

Continued approval and accreditation assumes that your organisation is maintaining or improving the policies and procedures you have documented and demonstrated to NZQA. Please advise NZQA immediately if there are significant changes to these policies and procedures.

Programme approval and accreditation will be reviewed as part of your self-assessment and external evaluation review.

Please contact **Section 9(2)(a)** – Approvals and Accreditation, phone **Section 9(2)(a)** or email **Section 9(2)(a)** if you have any queries.

Yours sincerely



Section 9(2)(a)

Manager

Approvals and Accreditation

Quality Assurance Division

R0482 Programme Details



NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

Programme Overview

Programme number 109859
Title Certificate in SSBA Construction Diving to 50m
Type Certificate
Owner New Zealand School of Outdoor Studies Limited (8449)
Level 05
Total credits 44
Total learning hours 440

Aim To develop the skills necessary to safely operate in the offshore commercial dive sector. This requires certification for ADAS Construction Diver Part 3 to allow application for the Department of Labour issued Certificate of Competence needed to work as a construction diver in New Zealand in offshore contexts. From skills initially focussed on safety in moving to and working at greater depth, use of wet bell and specialist rigging skills in diving operations is taught. This expands to embrace use of specialist equipment to 50 metres, advanced decompression utilising a compression chamber, and operating a compression chamber.

Content The programme builds on skills and knowledge obtained in the Underwater Construction Diver programme or ADAS level 2. Offshore occupational diving skills are focussed on with current industry practices being taught including operation of wet bells and compression chambers, use of hot water suits, pipeline servicing, use of hydraulic and other specialised equipment at depth, management of dive control panels and systems, underwater rigging, hazard management and load movement at depth in offshore operation environments. The course also includes a Hyperbaric Chamber Operator's certificate, completed as part of the ADAS Part 3 certification.

Outcome On completion of this qualification graduates will hold the internationally recognised Australian Diver Accreditation Scheme Part 3 accreditation and a Chamber Operator's Certificate thus meeting the requirements for award of the third (offshore commercial diver) Department of Labour Certificate of Competence. Graduates are able to work as construction divers to a depth of 50 metres using Surface Supply Breathing Apparatus and can safely conduct advanced construction and commercial diving tasks at depth. They can also work in and from a wet bell, utilise a compressor chamber for their own decompression in offshore diving operations, and operate a compression chamber.

Entry requirement All applicants must have a valid Occupational Diver Medical Certificate; completed ADAS level 2; swim 200 metres non-stop and then tread water with one arm up for two minutes; jump from a height of not less than two metres in to the water; be able to add, subtract, multiply and divide whole numbers, decimals and fractions to calculate percentages; be able to solve simple formulas, such as gas laws.

Standards

There are no standards associated with this programme

Qualifications

Qualification(s) completed as part of this programme:

Number	Title	Level	Credits
PC9740	Certificate in SSBA Construction Diving to 50m - NZ School of Commercial Diver Training	5	42-55

Delivery and Assessment

Provider New Zealand School of Outdoor Studies Limited (8449/1)

Delivery mode type Face-to-Face

Delivery method Unchanged.

Assessment Method Unchanged.

Programme length

Total length 8 Including holiday weeks

Teaching weeks 8 Excluding holiday weeks

Appendix B

STEO Screenshots

STEO Screenshots

Qualification Details: PC8449 - Certificate in SSBA Construction Diving to 30m

Qualification Code: PC8449 Title: Certificate in SSBA Construction Diving to 30m Provider: NZ School of Commercial Diver Training 8449

Qualification Status: Active NZQF Level: 4 Type: Private Training Establishment

First Taught: 23/11/2009 Last Taught: Provider Status: Open/Funded/SDR

Approvals		Study Details		DMA Info		Provider Info	
Duration							
Teaching Hours Weekly	40	FTE Teaching Weeks	12	Learning Hours per Year	660	Credits/Points	66 <input type="checkbox"/> Part-time
Work Experience Weekly	0	Recess Weeks	0	Number of Years	1.0	NQF Credits	0
Self-Directed Learning Weekly	15	FTE Gross Weeks	12	Loan Fee Cap		Loan Cap Start Date	<input type="button" value="Loan Cap Update"/>
QA							
Quality Approval Received	<input checked="" type="checkbox"/>	Quality Approval Body		NZQA			
Teacher Registration Board Approval	<input type="checkbox"/>						
MoE Approval							
Eligibility		Approval Date		EFTS Value Set		SAQ	
EFTS Funding	<input checked="" type="checkbox"/>	30/10/2009		0.55		0.0458	
Allowances	<input checked="" type="checkbox"/>	30/10/2009		Most recent reason for EFTS change		Significant change. NZQA docs sighted, qual approved as of 13/02/2015. 66/120=0.55EFTS, meets LET & converges	
Loans	<input checked="" type="checkbox"/>	30/10/2009					
Allowances Approval Withdrawn	<input type="checkbox"/>						
Loans Approval Withdrawn	<input type="checkbox"/>	Qualification Approval Review Date					

Qualification Details: PC9740 - Certificate in SSBA Construction Diving to 50m

Qualification Code: PC9740 Title: Certificate in SSBA Construction Diving to 50m Provider: NZ School of Commercial Diver Training 8449

Qualification Status: Active NZQF Level: 5 Type: Private Training Establishment

First Taught: 19/05/2007 Last Taught: Provider Status: Open/Funded/SDR

Approvals		Study Details		DMA Info		Provider Info	
Duration							
Teaching Hours Weekly	40	FTE Teaching Weeks	8	Learning Hours per Year	440	Credits/Points	44 <input type="checkbox"/> Part-time
Work Experience Weekly	0	Recess Weeks	0	Number of Years	1.0	NQF Credits	0
Self-Directed Learning Weekly	15	FTE Gross Weeks	8	Loan Fee Cap		Loan Cap Start Date	<input type="button" value="Loan Cap Update"/>
QA							
Quality Approval Received	<input checked="" type="checkbox"/>	Quality Approval Body		NZQA			
Teacher Registration Board Approval	<input type="checkbox"/>						
MoE Approval							
Eligibility		Approval Date		EFTS Value Set		SAQ	
EFTS Funding	<input checked="" type="checkbox"/>	9/05/2007		0.3667		0.0458	
Allowances	<input checked="" type="checkbox"/>	14/05/2007		Most recent reason for EFTS change		Significant change. NZQA docs sighted, qual approved as of 13/02/2015. 44/120=0.3667 EFTS, meets LET & converges with other	
Loans	<input checked="" type="checkbox"/>	14/05/2007					
Allowances Approval Withdrawn	<input type="checkbox"/>						
Loans Approval Withdrawn	<input type="checkbox"/>	Qualification Approval Review Date					

Appendix C

Alternative delivery of PC9740

Alternative assessment: PC9740 (SSBA to 50m)					
Year	Credits Duration	EFTS delivered	Hours recorded in STEO	Actual delivery	Compliant
2010	42 credits 12 weeks	20.30	Duration: 12 weeks Teaching: 25 / week (300 total) Self-directed: 10 / week (120 total) Total: 420 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self-directed at 40 hours (82 hours total) Total: 334 hours	79.52%
2011	42 credits 12 weeks	13.65	Duration: 12 weeks Teaching: 25 / week (300 total) Self-directed: 10 / week (120 total) Total: 420 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self directed between Part 2 and Part 3 (82 hours total) Total: 334 hours	79.52%
2012	55 credits 10 weeks	36.66	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 3 weeks teaching + 1 week self directed (7 days / week) Teaching: 84 hours / week (252 hours total) Self-directed: 14 hours / week + 1 week self directed between Part 2 and Part 3 (82 hours total) Total: 334 hours	60.73%
2013	55 credits 10 weeks	26.12	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 4 weeks (5 days per week) + 1 week self directed (5 days) Teaching: 60 hours / week (240 hours total) Self-directed: 15 hours / week + 22 hour allowance (82 hours total) Total: 322 hours	58.55%
2014	55 credits 10 weeks	16.50	Duration: 10 weeks Teaching: 40 / week (400 total) Self-directed: 15 / week (150 total) Total: 550 hours	Duration: 4 weeks (5 days per week) + 1 week self directed (5 days) Teaching: 60 hours / week (240 hours total) Self-directed: 15 hours / week + 22 hour allowance (82 hours total) Total: 322 hours	58.55%
2015	44 credits 8 weeks	8.80	Duration: 8 weeks Teaching: 40 / week (320 total) Self-directed: 15 / week (120 total) Total: 440 hours	Duration: 8 weeks (5 days per week) Teaching: 42.5 hours / week (340 hours total) Self-directed: 14 hours / week (112 hours total) Total: 452 hours	102.73%

The assessment of delivered learning hours above reflects an additional 22 hours of self-directed study during 2013 and 2014 for the Certificate in SSBA Construction Diving to 50m (PC9740). Refer to paragraphs 3.29 to 3.32 of this report for further information.

Appendix D

Key Sources of Information

Type	Details
Documents	<ul style="list-style-type: none"> • NZQA Course Approvals and Type 2 changes for selected programmes • Student handbooks and workbooks for selected programmes • Assessment workbook (both programmes) • Spreadsheet recording all course completions for 2014 and 2015 • Enrolment forms and supporting documentation for 36 students • Single Data Return 2014 & 2015, and total values for 2010 to 2013 • Course timetables 2013 and 2014 • STEO printouts for selected programmes
Staff	<ul style="list-style-type: none"> • Section 9(2)(a) [REDACTED]
Other	<ul style="list-style-type: none"> • 15 student interviews Section 9(2)(a) [REDACTED]

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