

Tertiary Education Commission
Audit Report

Western Institute of Technology at Taranaki
Student Achievement Component Funding

Edumis Number: 6017
Audit Dates: 12 – 13, 17 – 20 June 2014
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1 Purpose

The purpose of the audit was to provide assurance that Western Institute of Technology at Taranaki (WITT) is meeting the Investment Plan Funding Conditions as referred to in the Tertiary Education Commission (TEC) letter of approval dated 20 December 2013. The letter included approval for Student Achievement Component (SAC) funding of \$13,350,163.

2 Scope

The scope of the audit was aligned to the performance commitments in the TEC Investment Plan and the associated funding obligations between TEC and WITT. The scope was outlined in the audit arrangements letter.

The focus areas included:

- The reporting through the Single Data Return, including recording enrolments, withdrawals and completions.
- National Certificate in Māori Performing Arts (Performance) (Level 4).
- National Diploma in Māori Performing Arts (Tutoring) (Level 6).
- New Zealand Diploma in Engineering (Civil, Electrical and Mechanical Strands) (Level 6).
- Bachelor of Nursing (Level 7).
- Academic system and controls.
- Whether inducements or benefits have been provided to students.
- Responsibility for subcontracting arrangements.
- Compliance with the requirements in Part 16 of the Education Act 1989.

An audit is a snapshot of an organisation's performance at a particular point in time and may not, as such, provide a view of ongoing compliance. An audit is based on sampling and issues may remain undetected. The outcome of this audit will contribute to decisions made by TEC relating to current and future funding.

3 Background

On 16 May 2014, WITT identified concerns around course completions being achieved in one cohort of students dating back to 2012. WITT Chief Executive engaged an independent auditor to investigate.

WITT independently advised TEC and NZQA of potential discrepancies in the enrolment, assessment and completion of a cohort of 222 students enrolled from 2012 in the National Certificate in Māori Performing Arts (Performance) Level 4.

TEC brought forward the planned audit of WITT to investigate the concerns raised.

WITT is based in New Plymouth, serves the tertiary education needs of the Taranaki district and has strong links with industry and the local community.

[Redacted]

[Redacted]

4 Key Findings

- The audit found significant issues relating to integrity of data reported through the Single Data Return, poor standards of recordkeeping and ineffective management controls in the sample of records selected from 2009 to 2014. These records covered the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6). These concerns did not extend to the other two programmes covered in this audit.
- WITT enrolled 222 students in one cohort in the National Certificate in Māori Performing Arts (Performance) (Level 4). Funding was claimed from the course start date of 16 July 2012 to 19 April 2013. The majority of signed and dated student enrolment forms covered a 10-day period from 12 to 21 October 2012. The [REDACTED] commented that the programme commenced in late October 2012 and student academic results were internally recorded as completed on 27 November 2012. The [REDACTED] also commented that the programme ceased in February 2013. Academic results were reported to the Results Committee on 22 June 2013. There are serious concerns with the period of funded delivery versus actual delivery, poor recordkeeping that includes no attendance records, the size of the cohort and the timeliness and credibility of reported academic results.
- An internal review by WITT of the 222 cohort in June 2014 identified that there was evidence that 95 students had met all course requirements for the awarding of the National Certificate while 127 students had not. All 222 students graduated with the National Certificate in Māori Performing Arts (Performance) (Level 4) on 19 November 2013.
- From 2012 high volumes of whakapapa statements were submitted with enrolment forms in both the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6). Whakapapa statements can be used in limited circumstances but the use of whakapapa statements was widespread and non-compliant with TEC guidelines.
- The audit could not confirm domestic status had been established from 2012 for some students prior to enrolment and acceptance into the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6).
- In the sample of 43 records covering cohorts dating from 2009 to 2014 there were examples where enrolment forms were signed and dated by students after the date from which funding commenced. This appeared to be a recurring practice in the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6).
- Te Wānanga Māori a department within the Humanities Faculty, had evolved a separate and undocumented enrolment process that was not consistent with the detailed enrolment and admissions process at WITT. An enrolment form with or without evidence of domestic status was often all that was submitted to Registry.

- Conflicts of interest were not managed according to WITT policies and procedures, and included one student enrolled in the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6) being taught and assessed by immediate family members. There was no evidence that the relationships had been declared, and no evidence of checks and balances in place for the marking and moderating of this student's assessments.
- Tutors receiving professional development were enrolled in programmes they were teaching. This occurred in 2011 in the National Certificate in Māori Performing Arts (Performance) (Level 4) and 2012 in the National Diploma in Māori Performing Arts (Tutoring) (Level 6). In the Level 4 programme enrolment forms have been completed four months after the TEC-funded course start date of February 2011. Learning extended past the course end date which has not been captured in the SDR. There are concerns with the period of funded delivery versus actual delivery and data accuracy with respect to reporting through the SDR.
- Nine delivery sites have not been approved by NZQA with one site recorded as having field trip status.
- There was no formal contract for delivery of training at Auckland Region Women's Corrections Facility.

The enrolment screening process did not identify Recognition of Prior Learning.

5 Recommendations

- Further investigation is advised to establish when delivery commenced in 2012 for WITT cohort **NC0701 S2HW 12** and the date when the programme concluded in 2013.
- WITT to identify all courses in the cohort of 222 students where course requirements have not been met by 127 students.
- NZQA to review the outcomes of WITT's internal review and TEC's audit and assess whether any further action is required.
- Evidence of domestic status for students is retained by WITT for each student to confirm eligibility to enrol in TEC-funded programmes.
- WITT to ensure all faculties use one admissions and enrolment process.
- WITT to review its:
 - conflict of interests' policy and procedures
 - professional development policies and practices that have allowed tutors to study in programmes they are teaching.
- WITT to develop a written agreement for the delivery of training at Auckland Region Women's Corrections Facility.

- WITT to review why approval was not obtained from NZQA for nine delivery sites and what measures it has in place to ensure this practice does not recur.



Part Two

Findings

Detailed findings are summarised in each of the audit focus areas.

Overview

- A sample of 72 SAC student records was selected for audit. This included 43 student records from 2009 to 2014 covering the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6).
- From the 43 student records ten were from the July 2012 to April 2013 cohort of 222 students (NC0701 S2HW 12), which is the subject of an independent investigation commissioned by WITT.
- The balance of student records was selected from nursing and engineering programmes. There were no concerns relating to these records.
- Interviews were held with [REDACTED].
- At the time of the audit there were 35 students enrolled in the National Certificate in Māori Performing Arts (Performance) (Level 4) and 45 students in the National Diploma in Māori Performing Arts (Tutoring) (Level 6).

Audit focus areas	Evidence sighted
<p>1. Compliance with reporting obligations, including reporting through the Single Data Return, recording enrolments and withdrawals.</p>	<p>Student Application and Enrolment</p> <ul style="list-style-type: none"> • Te Wānanga Māori enrolment process was undocumented and followed an independent process compared with the official WITT enrolment policy. The process used does not align with WITT Applications and Enrolment Policies and Procedures. • From the ten level 4 or level 6 programme files sampled the enrolment form was sighted. This was the only consistent document sighted. • Copies of birth certificates and New Zealand passports were generally on student files providing evidence of domestic status. Whakapapa statements were also submitted and some files held NSI – Active. Registry coded an NSI as ‘A’, however this was insufficient to verify domestic status. • Many students had commenced studies before the enrolment form had been signed, while offer of placement letters were dated after the course commencement date. Some files did not retain a copy of the placement letter. • Registry generated the offer of placement letters from a template that was overwritten for subsequent students enrolled within a cohort. Registry commented that they emailed the offer of placement letters

to Te Wānanga Māori. Records however, were incomplete and there was no effective system in place to ensure these letters were sent.

- In the sample of 43 records covering cohorts dating from 2009 to 2014 there were examples where enrolment forms were signed and dated by students after the date from which funding commenced.

Course start dates showing students signed enrolment forms after programme has commenced.



- The table above excludes the cohort of 222 students where the enrolment forms were signed on average three months after the date funding commenced.
- The majority of signed and dated student enrolment forms (159 in total) covered a 10-day period from 12 to 21 October 2012. (Appendix 1)

Reporting and Certification

- There were several examples where Te Wānanga Māori was not complying with the Reporting and Certification policy and procedure resulting in several students not having their qualifications awarded in a timely manner.
- One example is student [redacted] [redacted] The Notification of Graduates form had not been completed by [redacted] then signed off by the [redacted] and submitted to the Academic Board through the Board of Studies.

Student Management System

- WITT uses a commercial database student management system Artena, which is software certified by the Ministry of Education for the Single Data Return (SDR). Artena is used to load enrolments, record withdrawals and report course completions.
- WITT has controls in place for managing the SDR. This includes segregation of duties for data input, checking data, and ensuring course completions are coded and reported. The SDR is signed by the Chief Executive once formal checks are completed and any errors resolved.

	<p>Recognition of Prior Learning</p> <ul style="list-style-type: none"> WITT has a policy for the recognition of prior learning. <p>[Redacted]</p> <p>[Redacted]</p> <p>Comment</p> <ul style="list-style-type: none"> The student file review established that the enrolment process used by Te Wānanga Māori for a student to enter a programme was inconsistently applied from year to year. Insufficient enrolment data was available on file to allow audit to track the start and end dates of each funded programme. 			
<p>2. National Certificate in Māori Performing Arts (Performance) (Level 4).</p>	<ul style="list-style-type: none"> The National Certificate is funded for 1.0 EFTS and is a one year full-time programme. [Redacted] <p>Table showing Tutorial Staff enrolled in the National Certificate in Māori Performing Arts (Performance) (Level 4).</p> <table border="1" data-bbox="459 1234 1321 1570"> <tr> <td>[Redacted]</td> <td>[Redacted]</td> <td>[Redacted]</td> </tr> </table> <ul style="list-style-type: none"> There is a discrepancy between the funded course commencement date of 21/02/2011 reported in the SDR and the date that the enrolment form has been signed and dated by each student in May and June 2011. <p>[Redacted]</p>	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]		

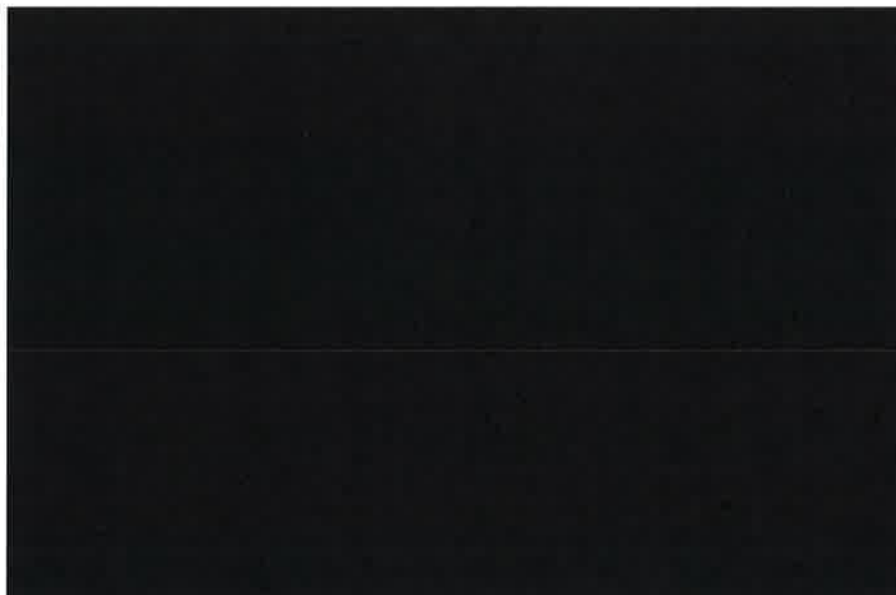
- No evidence was sighted during the audit of assessments and all six students were awarded the qualification on 31/12/2011.
- The [REDACTED] commented during the audit that tutors continued studying beyond the course end date. The start and end dates do not align with the reporting of courses in the SDR.
- WITT enrolled 222 students in one cohort in the National Certificate in Māori Performing Arts (Performance) (Level 4) from 16 July 2012 to 19 April 2013. (WITT reference: **NC0701 S2HW 12**).
- The [REDACTED] was interviewed during the audit and stated that the National Certificate in Maori Performing Arts (Performance) (Level 4) NC0701 S2HW 12 commenced in late October 2012 and ceased in February 2013. There was no evidence available to corroborate this statement.
- A tutor interviewed on 20/06/2012 commented that the practice of recording attendance had fallen into abeyance for some time.
- Student academic results were internally recorded as being complete and registered on 27 November 2012 in software called 'aPlus+.' The assessment results were internally recorded before all student assessments had been completed and the course end date.
- The academic results were reported to WITT's Results Committee on 22 June 2013.
- The Results Committee requested further detail on the 222 students' assessments that were competent on their first attempt at the assessment with no reassessments required. Memoranda were written but it appears there was no follow up. WITT has commented that final approval of the results was the responsibility of the Humanities Board of Studies as the [REDACTED] had not delegated the authority to the Results Committee to approve any results from the Humanities Faculty, which included Te Wānanga Māori. All results once reviewed by the Results Committee returned to the Faculty for final approval by the Humanities Board of Studies.
- The 222 qualifications were awarded by NZQA on 19 November 2013.
- An internal review by WITT in June 2014 identified there was evidence that 95 students had met all course requirements for the awarding of the National Certificate while 127 students had not.
- There are serious concerns with the period of funded delivery versus actual delivery. Poor recordkeeping is also a matter to be addressed including not maintaining attendance records, incomplete assessment records and the size of the cohort with minimum teaching resource requirements not being met.
- WITT will need to identify each course reported through the SDR where there is no evidence / insufficient evidence to sustain the audit trails relating to that course completion. This will provide TEC with the EFTS-weighted course completion rate and how much has been claimed for courses that should have been reported correctly

as unsuccessful or did not complete.

Whakapapa Statements

- TEC expects that whakapapa statements are only to be used in limited circumstances when a student cannot obtain a birth certificate. The expectation is that the whakapapa statement is to be signed by both the student and Kaumatua.
- A total of 13 whakapapa statements were sighted in the sample of 43 student records in the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6).
- It was not established in what capacity the person was acting who signed or 'dry stamped' each of the documents as shown in the following table.

Table of Whakapapa Statements



July 2012 – April 2013 Student Cohort

- In the cohort of 222 students there were 109 whakapapa statements provided. Several of these with a start date of 16/07/2012 are included in the table above. The findings relating to whakapapa statements both in the wider sample (Level 4 and Level 6) and the cohort of 222 students include the following:
 - There was no evidence reasonable efforts had been made to request evidence of domestic status from students in the form of a birth certificate before proceeding to a whakapapa statement.

	<ul style="list-style-type: none"> ○ The whakapapa statements were counter-signed or dry stamped by persons whose standing as a Kaumatua was not documented and could not be verified from the whakapapa statement. ○ The whakapapa statements were used to support the enrolment process. ○ The volume of whakapapa statements accompanying enrolment forms needs to be reviewed as no controls were used to moderate this practice. A whakapapa statement has been used to verify a student's identity since 2011. <p>Comment</p> <ul style="list-style-type: none"> ● Conflicting advice was provided from managers and teaching staff during the audit when access was requested to documented assessment and attendance material. ■ teaching staff were enrolled in the level 4 programme yet were named as also having teaching responsibilities for sections of the programme.
<p>3. National Diploma in Māori Performing Arts (Tutoring) (Level 6).</p>	<ul style="list-style-type: none"> ● The National Diploma is funded for 1.0 EFTS and is a one year full-time programme. Programme material advised that a student needs to have completed the Level 4 certificate programme before entering Level 6. <div style="background-color: black; width: 100%; height: 80px; margin: 10px 0;"></div> <p style="text-align: center;">Table of ■ tutors enrolled in the National Diploma in Māori Performing Arts (Tutoring) (Level 6).</p> <div style="background-color: black; width: 100%; height: 100px; margin: 10px 0;"></div> <ul style="list-style-type: none"> ● No evidence was sighted during the audit of assessments. ■ ● There was one cohort of 51 students enrolled in the Level 6 National Diploma reported in several SDRs. The programme is ND1088 S2ARWCF 13 that commenced on 29/07/2013 and concluded on 02/05/2014. ● In this cohort there were 37 students that appeared to have been directly enrolled into the Level 6 programme without having

	<p>completed the Level 4 programme. Interviews with the tutors indicated that this was a coding error in the SDR and that this cohort is a Level 4 programme.</p> <ul style="list-style-type: none"> Monitoring or internal audit had not identified and corrected the error which potentially has an impact on Educational Performance Indicators. Further checks are required to establish whether or not this is a coding error. If students have been enrolled in the Level 6 programme then a re-enrolment process needs to be followed. Insufficient monitoring of student enrolments and associated data has shown that 2013 and 2014 SDR errors have occurred.
4. New Zealand Diploma in Engineering (Civil, Electrical and Mechanical Strands) (Level 6).	<ul style="list-style-type: none"> There were no concerns regarding the sample of student records selected for this programme.
5. Bachelor of Nursing (Level 7).	<ul style="list-style-type: none"> There were no concerns regarding the sample of student records selected for this programme.
6. Academic System and Controls.	<ul style="list-style-type: none"> WITT introduced the National Certificate in Māori Performing Arts (Performance) (Level 4) in 2009, followed in 2010 by a National Diploma in Māori Performing Arts (Tutoring) (Level 6). The certificate and diploma programmes managed a comparable number of student enrolments until Hawera Marae attracted 222 students in July 2012. From discussions further attendees were present and estimated by staff at up to 400. From this cohort of students no documented evidence was available such as attendance records and progress of achievement including assessment results. Student academic results were internally recorded as being complete and registered on 27 November 2012 in aPlus+. This system is used internally for recording academic results before this information is presented to the Results Committee. For the National Certificate in Māori Performing Arts (Performance) (Level 4) class contact for each student is equal to 432 hours and self-directed to 768 hours amounting to 1200 hours annually. The National Diploma in Māori Performing Arts (Tutoring) (Level 6) requires a student to engage in 480 class contact and 720 self-directed hours amounting to 1200 hours. WITT was unable to produce the documented evidence supporting class contact and self-directed learning each student received.

	<ul style="list-style-type: none"> • At the time of the 222 enrolment issue the national certificate programmes were under the management of the Humanities Faculty. The appropriate staffing of the 222 cohort was questioned during the audit as the NZQA approval document requires one full-time experienced Kapa Haka tutor for every 25 students. • Other evidence concerned programme requirements and consistency of standards across all teaching sites was questioned, including the documented structure and teaching of the programme. • The lack of documentation was referred to in the August 2011 WITT Evaluation Report where the current enrolment/application process was viewed as working inadequately for staff and students in Te Wānanga Māori. The report comments on programme documents including programme regulations, course descriptor and course outlines requiring development. Further matters raised included moderation of the programme results, reporting of results. • During August 2013 a follow-up report named the Evaluation Report, was undertaken as a Te Wānanga Māori Self-Assessment based on an internal review of progress achieved since the 2011 report. • According to the 2013 report the enrolment process remained inadequate while the reporting of results was rated as appropriate. Deadlines for reporting were not met and the WITT Results Committee claimed difficulty with receiving a reply to queries or requests for supporting documentation. • The WITT Quality Management System outlines adequate Reporting and Certification policy and procedures and requires this to be adhered to across WITT. • Te Wānanga Māori apply an enrolment process that is a flowchart of three steps. It is not comparable to the formal WITT enrolment process developed for institute-wide purposes. • The June 2012 Results Committee meeting approved all student final results and then asked a series of qualifying questions including how many students passed assessment and within the cohort of students were there any recognition of prior learning passes. • At the August 2012 Results Committee, tutors were asked to forward the external moderation results to the committee. No comments in future Results Committee meeting minutes were available to confirm that information had been submitted subsequently. WITT has commented that final approval was the responsibility of the Humanities Board of Students and the external moderation reports may have been presented to this committee. • As the demand for student enrolment increased for the level 4 and 6 programmes more teaching or Marae-based sites were required. At the 26 June 2012 Academic Board, approval was given to the proposed nine Marae to become teaching sites. This decision was dependent on all WITT standards and criteria being met by each Marae. • At the 7 May 2013 Academic Board meeting, it was notified that the Parihaka Marae did not meet teaching site requirements. As an alternative the Academic Board agreed teaching on this Marae should be classified as a field trip on condition that WITT field trip policy and procedures were met.
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	<ul style="list-style-type: none"> • While WITT has institute-wide internal academic policies and controls many examples were identified during the audit where the National Certificate in Māori Performing Arts (Performance) (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6) procedures varied. From the information reviewed this was evident from the introduction, in 2009, of the first certificate programme.
7. Whether inducements or benefits have been provided to students.	<ul style="list-style-type: none"> • From the sample of records reviewed there was no evidence of any student being provided with an inducement or benefit to study. • This matter is being further reviewed by an independent consultant.
8. Responsibility for subcontracting arrangements.	<ul style="list-style-type: none"> • WITT is advised to complete a formal contract with the Auckland Region Women's Corrections Facility to ensure appropriate staffing, tuition times and student enrolment procedures meet NZQA requirements. • The National Certificate in Māori Performing Arts (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6) has been provided at the Corrections Facility for several years.
9. Compliance with the requirements in Part 16 of Education Act 1989.	<ul style="list-style-type: none"> • Part 18 of the Education Act 1989 includes, but is not limited to student programme information and records. • The overall standard of recordkeeping for the National Certificate in Māori Performing Arts (Level 4) and National Diploma in Māori Performing Arts (Tutoring) (Level 6) was assessed as unsatisfactory. Records were incomplete, there were concerns with funded starting dates not matching actual delivery dates, audit trails were lacking and there was inadequate management oversight.

APPENDIX 1: Sample of Student Records Selected for NC0701 S2HW 12 National Certificate in Māori Performing Arts (Performance) (Level 4)



Dates on enrolment forms in the cohort of 222 students enrolled starting 16/07/2012.

Total	222

