AsureQuality
Kaitiaki Kai

AsureQuality Academy
2025 Self-Review - The Educational (Pastoral Care of tertiary and international learners) Code of Practice 2021

Contents

INTRODUCTION 3
PART 1: Gap Analysis 3
Organisational structures to support a whole-of-provider approach to learner wellbeing and safety 4
Outcome 1: A learner wellbeing and safety system 4
Outcome 2: Learner voice 14
Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments 20
Outcome 4: Learners are safe and well 25
Additional wellbeing and safety practices for tertiary providers (signatories) enrolling international learners 30
Outcome 8: Responding to the distinct wellbeing and safety needs of international tertiary learners 30
Outcome 9: Prospective international tertiary learners are well informed 31
Outcome 10: Offer, enrolment, contracts, insurance and visa 34
Outcome 11: International learners receive appropriate orientations, information and advice 42
Outcome 12: Safety and appropriate supervision of international tertiary learners 45
PART 2: Action Plan 52
PART 3 - Complaints and Critical Incidents 2025-2026 54

INTRODUCTION

Under the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021, tertiary education providers are required to undertake regular self-review of their learner wellbeing and safety practices and make the results available to learners, staff, and the wider public. The self-review process supports continuous improvement and helps ensure that learners are safe, supported, and able to achieve their educational goals.

This report presents the Academy's annual self-review and gap analysis against the requirements of the Code. It identifies current levels of compliance, records evidence of existing practices, highlights areas of strength, and identifies any gaps or opportunities for improvement.

The findings of this review will inform the Academy's ongoing quality assurance activities and improvement planning, ensuring continued compliance with the Code and a commitment to positive learner wellbeing and safety outcomes.

PART 1: Gap Analysis

This section provides a detailed assessment of the Academy's compliance with each outcome and process of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021. The analysis identifies current practices, supporting evidence, areas of strength, compliance status, and any gaps or improvement opportunities.

KEY	
COMPLIANT	• We have the required practices in place • We have sufficient evidence on which to make judgements about the effectiveness of our practices
GAP (in evidence)	• We have the required practices in place but… • …we have limited evidence on which to make judgements about the effectiveness of those practices
GAP (in practice)	• We do not have the required practices in place

Organisational structures to support a whole-of-provider approach to learner wellbeing and safety

Outcome 1: A learner wellbeing and safety system

Providers must take a whole-of-provider approach to maintain a strategic and transparent learner wellbeing and safety system that responds to the diverse needs of their learners.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can use as evidence of our compliance with this clause	**COMPLIANT**	**GAP (in evidence)**	**GAP (in practice)**
Process 1: Strategic goals and strategic plans **Clause 7 (1).** Providers must have strategic goals and strategic plans for supporting the wellbeing and safety of their learners across their organisation, including student accommodation, describing how they will – (a) give effect to the outcomes sought and processes required by this code; and	Policies and procedures AQ Health Safety Commitment AQ Health Safety Manual – Annual Review AQ corporate health and safety and wellbeing team – Safety Hub Senior Ops Health and Safety Monthly Meetings Academy monthly Safety and wellbeing meetings (discusses the safety and wellbeing of learners) Hazard records and incidents are recorded in the AQ Portal Records risk on risk register	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(b) contribute to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relations.	AQ corporate commitment to Te Tiriti o Waitangi through Te Pātaka Uara, our Maori Strategy Academy Māori Strategy		We have the required practices in place, but we have limited evidence	

	Monthly Māori Strategy meetings (Academy) Partnership with PrimaryITO to support Māori learners.		AsureQuality demonstrates an organisation-wide commitment to Te Tiriti o Waitangi through its Māori strategy and ongoing initiatives that support Māori-Crown relations. While the Academy is aligned with these organisational commitments, its direct evidence base is currently emerging, as engagement and partnerships with iwi are in the early stages of development.	
Clause 7 (2). Providers must – (a) regularly review their learner wellbeing and safety strategic goals and strategic plans as described in subclause (1); and	Safety Management System Review Process H&S Manual – updated March 2026 Annual Self-review processes H&S Academy Meetings	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) make amendments to their learner wellbeing and safety strategic goals and strategic plans within a reasonable timeframe following the review.	Safety Management System Review Process H&S Manual – updated March 2026 Annual Self-review processes H&S Academy Meetings	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Clause 7 (3). Providers must work proactively with learners and stakeholders (and document this work) when – (a) developing their learner wellbeing and safety strategic goals and strategic plans described in subclause (1); and	Safety Management System Review Process H&S Manual – updated March 2026 Annual Self-review processes H&S Academy Meetings	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

(b) reviewing their learner wellbeing and safety strategic goals and strategic plans described in subclause (2).	KnowHow (Process and Procedure System) Reviews Annual Self-Review 2026 H&S Manual – updated March 2026 H&S Academy Meetings	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Process 2: Self review of learner wellbeing and safety practices **Clause 8 (1).** Providers must use strategic goals and strategic plans described in clause 7(1) to regularly review the quality of their learner wellbeing and safety practices to achieve the outcomes and practices of this code, at a frequency or by a date determined by the code administrator.	Ongoing review of practices at H&S meetings, in addition to annual self-review Pastoral Care Code drop-in sessions.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Clause 8 (2). Providers must review their learner wellbeing and safety practices using – (a) input from diverse learners and other stakeholders; and	Feedback and consultation from learners and employers, trainers across the organisation and the sector.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) relevant quantitative and qualitative data (including from learner complaints) that is, as far as practicable, and consistent with the provider's obligations under current privacy legislation, disaggregated by diverse learner groups.	Centralised systems generates surveys and regular reports. Learner feedback data is summarised into quarterly reports, where any learner may be identified due to unique needs the data QL data is summarised into themes in order to inform wider teams.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Clause 8 (3). Providers must, in a timely manner, following a review described in subclauses (1) and (2) take appropriate action to address any deficiencies in learner wellbeing and safety practices.	An annual review occurs as part of the policy and is addressed by the team during the monthly meetings, and participating in the Senior Ops H&S meetings.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Process 3: Publication requirements **Clause 9.** Providers must make the following information readily available, in accessible formats, to learners, staff and the general public, including on their websites (where available) – (a) strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(1); and	Annual review of publications and the website. Publication requirements are reviewed as per Know How procedures.		We have the required practices in place, but we have limited evidence. Our Annual Reports, which are published on the organisation's website, clearly outline our strategic purpose, organisational goals, and progress against these goals each year. The reports also include information relating to the health, safety, and wellbeing of staff and customers. However, there is an opportunity to strengthen how we communicate the Academy's specific contribution to supporting the wellbeing and safety of learners. While initiatives and practices exist, they are not consistently documented or highlighted in publicly available reports. Enhancing the visibility of learner wellbeing and safety outcomes, related initiatives, and reviews of their effectiveness would provide stronger evidence.	
(b) revisions to strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(2); and	The Code has been integrated with the safety and wellbeing meetings and other Academy Team meetings and Risk Management. Our AQ Annual Report and Interim Report could provide further information on the revision of our strategic goals and plans to support wellbeing and safety of our learners.			
(c) self-review reports on the quality of their learner wellbeing and safety practices described in clause 8.	Academy has good self-review ongoing practices through H&S wellbeing meetings, and review of knowhow procedures. With regards the publication of these, the AQ Annual Report			

	and interim report for the year could provide further information on the Academy's revision of our strategic goals and plans to support wellbeing and safety of our learners.			
Process 4: Responsive wellbeing and safety systems **Clause 10 (1).** Providers must gather and communicate relevant information across their organisation (including student accommodation) and from relevant stakeholders to accurately identify emerging concerns about learners' wellbeing and safety or behaviour and take all reasonable steps to connect learners quickly to culturally appropriate social, medical, and mental health services.	Health Safety and Wellbeing Commitment Code of Conduct Policy Learning and Development Policy Data is gathered in trainee trackers or enrolment, and via feedback directly to trainers or via email to training@asurequality.com. Emerging concerns are discussed in the safety and wellbeing meetings, WIP meetings, Trainer and assessor forums, Pastoral Care Meetings.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Clause 10 (2). Providers must provide staff with ongoing training and resources tailored to their roles in the organisation, in relation to – (a) Te Tiriti o Waitangi; and	AQ provides Te Reo training to staff and has the app Ako Tahi which is for staff and their whanau to learn about and share the distinctive cultural heritage of Aotearoa. SharePoint learning and resources available to staff. AQ corporate commitment to Te Tiriti o Waitangi through Te Pātaka Uara, our Maori Strategy Academy Māori Strategy Monthly Māori Strategy meetings (Academy)	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) the provider's obligations under this code; and	Through Friday Pastoral Care sessions, Safety and wellbeing meetings,, WIP Meetings,	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

	Academy Annual Trainers Forum, and Train the Trainer/induction courses.			
(c) understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and	Diversity Bi-Culture & Inclusion Policy SharePoint pages Through Safety and Wellbeing meetings and weekly team meetings. Trainer and Assessor Forums and workshops via SharePoint	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(d) identifying and timely reporting of incidents of racism, discrimination, and bullying; and	Bullying and Harassment Prevention Policy Diversity Bi-Culture & Inclusion Policy Family Violence Leave Policy Health Respect at Work Policy Safety and Wellbeing Commitment Code of Conduct Policy Through trainee trackers Trainer reports Customer care portal Through Safety and Wellbeing meetings. Weekly team meetings. Trainer and Assessor Forums and workshops via SharePoint.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(e) physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and	Code of Conduct and Standards of Behaviour Policy Diversity Bi-Culture & Inclusion Policy Family Violence Leave Policy Respect at Work Policy Health Safety and Wellbeing Commitment Code of Conduct Policy SharePoint pages Through Safety and well-being meetings. Monthly team meetings.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

	Trainer and Assessor Forums and workshops via SharePoint.			
(f) privacy and safe handling of personal information; and	Privacy Policy Privacy E-learning for staff (annual requirement) Permissions in the LMS and SMS also in the customer care portal. Through Safety and well-being meetings. Weekly team meetings. Trainer and Assessor Forums and workshops via SharePoint.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(g) referral pathways (including to local service providers) and escalation procedures; and	SharePoint information. Important Information to Learners brochure via the website and enrolment information. Through Safety and Wellbeing meetings. Monthly team meetings. Trainer and Assessor Forums and workshops via SharePoint. Risk Register and reporting in the AQ MySafety	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(h) identifying and timely reporting of incidents and concerning behaviours; and	Managed by the trainers and escalated where necessary. Reported in the Risk Register and MySafety, tracked in SharePoint. KnowHow processes. Discussed through Safety and Wellbeing meetings. Induction training Monthly team meetings. Trainer and Assessor Forums and workshops via SharePoint.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

(i) wellbeing and safety awareness and promotion topics including – i. safe health and mental health literacy and support; and ii. suicide and self-harm awareness; and iii. promoting drug and alcohol awareness; and iv. promoting healthy lifestyles for learners.	SharePoint information. Important information to Learner's brochure via the website and enrolment information, training materials. Through Safety and Wellbeing meetings. Weekly team meetings. Trainer Forums Induction training	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Clause 10 (3). Providers must have plans for assisting learners, and responding effectively, in emergency situations in the learning or residential community (whether localised or more widespread), including – (a) making these plans readily available to learners when they begin their study; and	Health and safety is an important aspect across AsureQuality. Learners can indicate the need for additional support in the enrolment form and are provided a number of opportunities prior to course delivery and during to indicate as to what additional support they require. Know How processes: • Managing a student notifiable event (critical incident)Recording the incident in MySafety and to the Risk Register. • Respond to Wellbeing Concerns process • Support students at risk and with special needs process	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) ensuring that there are suitably prepared staff members available to be contacted by a learner, or learners, in the event of an emergency; and	Trainers are provided specific information regarding learners with specific support requirements prior to start date. Staff attend the safety and wellbeing meetings. Course induction includes health and safety procedures. Trainer forums provide updates along with regular comms.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

(c) co-ordinating decision-making across the provider when responding to emergencies; and	Emergencies and critical incidents decision are managed by cross-functional team Business Continuity Plan Criss Manager, BCP Manager, CEO. Safety and Wellbeing policy Risk Management Policy Monthly H&S Wellbeing meetings	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(d) disseminating timely, accurate, consistent, and accessible information to learners and staff during emergencies; and	As per the Safety and Wellbeing policy and risk register and Risk Management Policy, and associated Academy know-how processes, such us: Manage a student notifiable event (critical incident) Respond to an emergency (Academy) which are linked to the AQ Business Continuity Planning procedures.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(e) ensuring all relevant staff are aware of the indicators of imminent danger to a learner or others and what action they can reasonably provide to help make them safe; and	As per Academy Safety Plans and the Safety and Wellbeing policy and risk register and Risk Management Policy	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(f) keeping a regularly updated critical incident and emergencies procedures manual which guides staff involved in emergency situations which contains the immediate and ongoing actions required including – i. engaging with relevant government agencies (e.g. the New Zealand Police, Ministry of Health, New Zealand Qualifications Authority, Tertiary	Know How processes: • Managing a student critical incident Recording the incident in MySafety and to the Risk Register. • Respond to Wellbeing Concerns process • Support students at risk and with special needs process Safety and Wellbeing policy,Risk register and Risk Management Policy. As per the safety and wellbeing manual. Monthly team meetings and Trainer Forums	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Education Commission); and ii. the follow-up de-briefing processes to support all learners and relevant staff; and				
(g) recording critical incidents and emergencies and reporting these back annually (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups) to provider management, learners, other stakeholders, and the code administrator.	Safety and Wellbeing Commitment Risk Management Policy Framework. Recording of the incident goes to the My Safety risk register and is reported in the MySafety meetings. Risk register is reviewed on a monthly basis or when a new risk or incident is identified - risks and controls reviewed and amended as necessary,	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Outcome 2: Learner voice

Providers understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	**Information we can use as evidence of our compliance with this clause**	**COMPLIANT**	**GAP (in evidence)**	**GAP (in practice)**
Process 1: Learner voice **Clause 12.** Providers must have practices for – (a) proactively building and maintaining effective relationships with diverse learner groups within their organisation; and	Relationships are built within the timeframes that learners are in training with the Academy. The needs and requirements of learners and companies to minimise barriers to learning are worked through on a case-by case basis.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) working with diverse learners and their communities to develop, review, and improve learner wellbeing and safety strategic goals, strategic plans and practices; and	The needs and requirements of learners and companies to minimise barriers to learning are worked through on a case-by case basis. Trainers report back to managers regarding specific needs during learning. Employers supply feedback on training.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(c) providing formal and informal processes for actively hearing, engaging with, and developing the diverse range of learner voices and those of their communities; and	Via consultation and feedback from learners and employers. Customer Care Portal Feedback Forms Trainers feedback to managers regarding specific needs during training.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

(d) providing timely and accessible resources to learners to support them and their learner communities to develop the necessary skills to enable them to participate fully in decision-making processes; and	Feedback regarding training venues, sessions and learning materials is gathered after every course and utilised in the improvement process.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(e) providing timely and accessible information to learners to increase transparency of providers' decision-making processes.	Annual & interim reports published on AsureQuality Website		We have the required practices in place; however, Academy-specific evidence is currently limited. AQ publishes annual and interim reports with information on organisational achievements, improvements, and strategic direction. While the Academy is included in these reports, there is an opportunity to expand Academy-specific content in future reporting to provide learners with more visibility of our decision-making processes.	
Process 2: Learner complaints **Clause 13.** Providers must – (a) work with learners to effectively respond to, and process complaints (including appropriate engagement with support people); and	As per KnowHow procedures: Manage Academy Feedback or Complaints Log customer complaint or feedback in customer care portal	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) inform learners on how the complaint will be handled and how it is progressing; and	As per the website, enrolment information and courseware	We have the required practices in place We have sufficient evidence on which to		

		make judgments about the effectiveness of our practices		
(c) handle complaints in a timely and efficient way, including having practices that – i. are appropriate to the level of complexity or sensitivity of the complaint; and ii. consider the issues from a cultural perspective; and iii. include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, restorative justice); and iv. comply with the principles of natural justice; and	As per KnowHow procedures: Manage Academy Feedback or Complaints Log customer complaint or feedback in customer care portal, or via the training@asurequality.com email address, or directly to the QA Lead or Academy Manager Diversity Bi-Culture & Inclusion Policy	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(d) ensure that the complaints process is easily accessible to learners (and those supporting them), including having practices for – i. providing learners with clear information on how to use the internal complaints processes (including the relevant people to contact), and the scope and possible outcomes of the processes; and	As per the website, enrolment and courseware information. Log customer complaint, or feedback in customer care portal, or via the training email training@asurequality.com, or directly to QA lead or Academy Manager.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

ii. addressing barriers to accessing this information (for example, due to language, lack of internet access, fear of reprisal, desire for anonymity), such as providing alternative ways of raising a complaint; and	As above, there are a variety of ways to access this information and alternative ways of raising complaints with the Academy. In addition to that, we have our Privacy Policy, Diversity Bi-Culture & Inclusion Policy, Customer Care Portal, Academy email, and Academy staff (QA Lead / Academy Manager).	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
iii. providing an opportunity for a support person or people (who can be chosen by the learner) to guide and support the learner through the complaints process; and	As per KnowHow procedures: Manage Academy Feedback or Complaints and website information on Concerns and Complaints.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
iv. providing the opportunity for groups of learners to make joint complaints; and	As per KnowHow procedures: Manage Academy Feedback or Complaints and website information on Concerns and Complaints.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(e) record complaints; and	As per KnowHow procedures: Manage Academy Feedback or Complaints Complaints Register Customer Care Portal	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(f) report annually to provider management, learners, other stakeholders, and the code administrator (including on provider websites where available) on – i. the number and nature of complaints made and their outcomes (at an	NPS, CSAT & Complaints Extract for Group Manager Commentary process TEO Self-Review reporting	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

aggregate level and, as far as practicable, disaggregated by diverse learner groups); and ii. learner experience with the complaints process and the outcome of their complaint; and				
(g) promote and publicise complaint and dispute resolution processes available to learners including, but not limited to, the provider's internal complaints process, the education quality assurance agency complaints process, the code administrator's complaints process, and the Dispute Resolution Schemes; and	Via the website, enrolment information. Course Information at the front of course workbooks	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(h) advise learners, on the next steps available to them if the provider does not accept the complaint (or the learner or provider perceives that the provider does not have the cultural competency to deal with it), or the learner is not satisfied that the provider has made adequate progress towards resolving the complaint, or the learner is not satisfied with the provider's internal complaints process or outcome, including – i. how to seek resolution of a contractual or financial dispute by way of a complaint or referral to an appropriate body or agency depending on the subject matter of the dispute, for example, the code administrator, the Dispute Resolution Scheme, the Disputes	Via the website – Concerns and Complaints, enrolment information. Course Information at the front of all course workbooks Learners/employers are not invoiced until after delivery has taken place.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

ii. Tribunal, the Human Rights Commission or the Ombudsman; and how to make a complaint to the code administrator if a learner believes that the provider is failing to meet the outcomes or requirements of this code.				
Process 3: Compliance with the Dispute Resolution Scheme **Clause 14.** Providers must ensure they are familiar with the relevant Dispute Resolution Scheme rules for domestic and international learners and ensure compliance with those rules in a dispute to which it is party.	Via the website -Link to StudyComplaints.org.nz enrolment information. Course Information at the front of all course workbooks Learners/employers are not invoiced until after delivery has taken place.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Wellbeing and safety practices for all tertiary providers

Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments

Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	**Information we can use as evidence of our compliance with this clause**	**COMPLIANT**	**GAP (in evidence)**	**GAP (in practice)**
Process 1: Safe and inclusive communities **Clause 16 (1).** Providers must have practices for – (a) reducing harm to learners resulting from discrimination, racism (including systemic racism), bullying, harassment and abuse; and	Code of Conduct and Standards of Behaviour Policy KnowHow Procedures: Respond to serious misconduct (staff) Manage student disciplinary matters and actions Diversity Bi-Culture & Inclusion Policy Health Safety and Wellbeing Commitment Trainer and Assessor Forums, Trainer observations, monthly meetings, workshops. AKO courses and Train the Trainer, SharePoint	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) working with learners and staff to recognise and respond effectively to discrimination racism (including systemic racism), bullying, harassment and abuse; and	Pastoral Care Meetings; Trainer Forums; SharePoint Resources and guidelines; KnowHow processes as above.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

(c) promoting an inclusive culture across the learning environment; and	Diversity Bi-Culture & Inclusion Policy; Code of Conduct and Standards of Behaviour Policy; Trainer and Assessor Forums; Trainer observations; monthly meetings, workshops. AKO courses and Train the Trainer, SharePoint Resources	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(d) upholding the cultural needs and aspirations of all groups throughout the learning environment; and	Diversity Bi-Culture & Inclusion Policy; Code of Conduct and Standards of Behaviour Policy; Trainer and Assessor Forums; Trainer observations; monthly meetings, workshops. AKO courses and Train the Trainer, SharePoint Resources	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(e) providing all learners with information – i. that supports understanding, acceptance, and connection with all learners, and collective responsibility for an inclusive learning environment; an ii. about the cultural, spiritual, and community supports available to them; and	Through pre-enrolment information, course information, course delivery resources (learner important information), housekeeping rules.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(f) providing learners with accessible learning environments where they can connect with others, build relationships, support each other, and welcome their friends, families, and whānau.	For the time that learners are training with the Academy they have access to sector specialists. Considering the training provided being often at the workplace, Trainers encourage networking and relationship building throughout the course.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Process 2: Supporting learner participation and engagement **Clause 17 (1).** Providers must provide learners with opportunities to – (a) actively participate and share their views safely in their learning environment; and	Through learning activities learners are encouraged to provide their own perspectives during delivery and assessment. Pastoral Care Meetings with staff Knowhow processes: Deliver training programme procedure	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(b) connect, build relationships and develop social, spiritual and cultural networks; and	Through learning activities learners are encouraged to provide their own perspectives during delivery and assessment. Pastoral Care Meetings with staff Knowhow processes: Deliver training programme procedure	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(c) use te reo and tikanga Māori to support Māori learners' connection to identity and culture.	AQ corporate commitment to Te Tiriti o Waitangi through Te Pātaka Uara, our Māori Strategy Academy Māori Strategy Monthly Māori Strategy meetings (Academy) Partnership with PrimaryITO to support Māori learners. Two Academy team members sit on Te Roopu Aka WHiri Hou (Bicultural Committee)		We have the required practices in place, but we have sufficient evidence. While the Academy is aligned with AQ wide commitments, our direct evidence base is currently emerging, as engagement and partnerships with iwi are in the early stages of development.	
Clause 17 (2). Providers must have practices for supporting learners through their studies, including – (a) enabling learners to prepare	The Academy works with employers and managers to establish the learning needs of the group. Learners connect via the training@asurequality.com through the enrolment form and during training. In some courses,	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

and adjust for tertiary study, and	pre-training materials are sent to prepare the learners for up-and-coming training.			
(b) maintaining appropriate oversight of learner achievement and engagement; and	Trainers and Academy Coordinators track learner progress and identify those that require additional support KnowHow Process: Monitor course completions and overdue assessments	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(c) providing the opportunity for learners to discuss, in confidence, any issues that are affecting their ability to study and providing learners with a response to their issues; and	Due to the nature of the industries learners approach the Academy or trainers in confidence. There are multiple ways for learners to inform the Academy of their need for support: via the training@asurequality.com through the enrolment form and during training. This is stated on their books and reinforced through staff training.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(d) providing learners with advice on pathways for further study and career development, where appropriate.	AsureQuality Key Account Managers and Commercial Training Manager regularly visit key stakeholders to ensure their needs are being met and to identify any knowledge or skills gaps that are preventing them from achieving their goals or meeting industry requirements. There is a collaborative approach in the review and development of current and new programmes. Via the website &the Commercial Training Manager	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
Process 3: Physical and digital spaces and facilities **Clause 18.**	Health and Safety Team, risk management, venue H&S protocols. Venues are reviewed annually. Incidents are reported to venues immediately.	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		

Providers must have practices for– (a) providing healthy and safe learning environments; and	Pre-H&S check sheets			
(b) identifying and, where possible, removing access barriers to provider facilities and services; and	KnowHow Process: Support trainees at risk or with special needs 1.0 Determine the need for additional support. 2.0 Arrange required support. Achieved through Venue Review	We have the required practices in place We have sufficient evidence on which to make judgments about the effectiveness of our practices		
(c) involving learners in the design of physical and digital environments when making improvements; and	Through learner feedback and consultation, as well through customer feedback on all AQ wide services.		We have the required practices in place, but we have insufficient evidence. Feedback response rate has been low with regards learning environments. Changing systems also meant some feedback responses were not able to be retrieved for a period of time within 2025 and 2026.	
(d) engaging with Māori and involving Māori in the design of physical and digital environments where appropriate.	Through learner feedback and consultation, as well through our GM General Manager - Māori Strategy and Engagement monthly Academy meetings.		We have the required practices in place, but we have insufficient evidence. Further work is being developed with iwi and consultation for new digital products and generic courses.	

Outcome 4: Learners are safe and well

Providers must support learners to manage their physical and mental health through information and advice and identify and respond to learners who need additional support.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	**Information we can use as evidence of our compliance with this clause**	**COMPLIANT**	**GAP (in evidence)**	**GAP (in practice)**
Process 1: Information for learners about assistance to meet their basic needs. **Clause 20 (1).** Providers must have practices for enabling all learners and prospective learners to identify and manage their basic needs (the essential material requirements to support wellbeing and safety including housing, food and clothing), including providing accurate, timely and tailored information on how they can – (a) access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety; and (b) access suitable accommodation and understand their rights and obligations as a tenant in New Zealand; and (c) maintain a healthy lifestyle.	KnowHow Process: Support trainees at risk or require additional support. Enrolling clients on course process. (special support or catering) and venue requirements. Additionally, learners who train with the Academy are in employment. The Academy work with supervisors, managers, and employers to establish learner needs.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Clause 20 (2). If food is made available by the provider on campus or in student accommodation, the provider must ensure that the food available includes a range of healthy food options that is obtainable at a reasonable cost.	Training is catered appropriately and reviewed annually as part of venue check or where learner or trainer feedback has been provided. Catering organisations have a variety of healthy options, and as part of health check pre-course we ensure water is available to learners.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Process 2: Promoting physical and mental health awareness **Clause 21.** Providers must have practices for – (a) providing opportunities and experiences for learners that improve their physical and mental health and wellbeing and safety; and	KnowHow Process: Support trainees at risk or with special needs Information is provided via the website and on SharePoint to specific agencies and is available through the PITO website for those completing a PITO programme. Trainers are trained on good practices regarding inclusive learning environments and wellbeing via pastoral care meetings, trainer forums, and weekly WIP meetings.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(b) promoting awareness of practices that support good physical and mental health that are credible and relevant to learners; and				
(c) supporting learners' connection to their language, identity, and culture; and				
(d) providing accurate, timely information and advice to learners about – i. how they can access medical and mental health services through the provider or through community and public services, including culturally responsive services; and ii. how they can report health and safety concerns they have for their peers; and iii. how to respond to an emergency and engage with relevant government agencies; and iv. how they can make positive choices that	Information on access to these services is available on the website and on the course materials (learner important information pages).	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

enhance their wellbeing.				
Process 3: Proactive monitoring and responsive wellbeing and safety practices. **Clause 22 (1).** Providers must have practices for – (a) requesting that domestic learners 18 years and over provide a name and up-to-date contact details of a nominated person; and	Emergency contact requested at enrolment Key workplace contact – Manager/Supervisor	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(b) describing the circumstances in which the nominated person referred to in paragraph (a) should be contacted in relation to their wellbeing and safety; and	Emergency contact requested at enrolment Key workplace contact – Manager/Supervisor This is also stated in the relevant knowhow processes: - Respond to wellbeing concern - Respond to an emergency - Manage a notifiable event (Critical Incident)	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(c) contacting the person nominated by domestic learners 18 years and over, in the circumstances described in accordance with paragraph (b), or where the provider has reasonable grounds for believing that the disclosure is necessary to prevent or lessen a serious threat to the student's life or health; and				
(d) enabling learners to communicate health and mental health needs with staff in confidence, including accommodation staff, so that the provider can proactively offer them support; and	KnowHow Process: Support trainees at risk or with special needs Pre-enrolment via the application form or via the training@asurequality.com email. During learning directly to trainer and or via the training@asurequality.com email	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(e) providing opportunities for learners to raise concerns about themselves or others in confidence; and				
(f) identifying learners at risk and having clear and appropriate pathways for assisting them to access services when they need it; and				

(g) identifying learners who are at risk of harming others, and i. having clear and appropriate pathways for assisting them to access services when they need it; and	KnowHow Process: Support trainees at risk or with special needs – 4.0 Report if the trainee(s) is at risk	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
ii. protecting learners and staff who experience harm from other learners and/or staff, including sexual assault; and	KnowHow Process: Support trainees at risk or with special needs – 4.0 Report if the trainee(s) is at risk	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(h) making arrangements with disabled learners or those affected by health and wellbeing difficulties to accommodate learning needs, including for study off-campus; and	KnowHow Process: Support trainees at risk or with special needs Venue accessibility Enrolment info regarding disabilities and special support	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(i) responding to disruptive and threatening behaviour in a way that is sensitive to a learner's situation; and	Knowhow process Manage student disciplinary matters and actions Terms and conditions	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(j) supporting learners whose study is interrupted due to circumstances outside their control, and providing inclusive, accessible re-entry processes for their transition back into tertiary study.	KnowHow Process: Support trainees at risk or with special needs The Academy does not invoice until after training learners or their employers/managers can cancel at any time and rebook when the timing suits.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Clause 22 (2). Providers must have up-to-date contact details and next of kin for domestic tertiary learners under 18 and international tertiary learners.	Emergency contact details and contact of the manager who booked the training are recorded in the SMS.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Clause 22 (3). Providers must contact the next of kin for domestic tertiary learners under 18 years and international tertiary learners if there is concern regarding the wellbeing or safety of a learner.	Emergency contact details and contact of the manager who booked the training are recorded in the SMS.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Clause 22 (4). Providers must maintain a record of reported risks, including any concerns raised in relation to the effective administration of this code.	Risk Register and regular ongoing reviews of the Code in monthly meetings, safety and wellbeing meetings.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Additional wellbeing and safety practices for tertiary providers (signatories) enrolling international learners

Outcome 8: Responding to the distinct wellbeing and safety needs of international tertiary learners

Signatories must ensure that practices under this code respond effectively to the distinct wellbeing and safety needs of their diverse international tertiary learners.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	**Information we can use as evidence of our compliance with this clause**	**COMPLIANT**	**GAP (in evidence)**	**GAP (in practice)**
Process 1: **Clause 35.** Signatories must engage with diverse international tertiary learners to understand their wellbeing and safety needs under the outcomes of Parts 3, 4 and 5 of this code.	Feedback forms and consultation (direct emails) with International tertiary learners. At the Academy, international students are those on work visas completing learning organised by their employer. Their needs are collected through the regular feedback channels. Informal feedback is also captured via trainer during the courses.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Outcome 9: Prospective international tertiary learners are well informed

Signatories ensure that prospective international tertiary learners receive clear, accessible, accurate and sufficient information, and make informed choices about the study and services a signatory provides before they begin their study.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Marketing and promotion **Clause 37.** Each signatory must have marketing and promotion practices, that include – (a) proactively seeking to understand the information needs of prospective international tertiary learners; and	International learners enrolled with AQ Academy are generally employed in New Zealand or hold work visas. They are either required to do the training for their jobs or are seeking further study to support their career development and employment opportunities. As AQ Academy's training is primarily delivered in a business-to-business context, the needs of prospective international learners are assessed through the same learner needs evaluation processes applied to all trainees, ensuring their study and employment objectives are understood and addressed when information about programmes and services is provided.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(b) developing and providing information to prospective international tertiary learners and reviewing the information to ensure it is kept up to date; and	International student handbook Annual review of marketing materials AQ Academy website	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

(c) ensuring that prospective international tertiary learners receive, as a minimum, up-to-date accessible and timely information about the following – i. the signatory's quality assurance evaluations; and ii. the educational instruction, staffing, facilities, and equipment available to international tertiary learners; and iii. the Dispute Resolution Scheme; and iv. potential learning outcomes for international tertiary learners, including pathways for further study, employment, and residency where applicable; and v. estimated study and living costs for international tertiary learners, including any additional fees or levies that are on top of the basic tuition fee; and vi. accommodation and transport, or ways to obtain such information.	International student handbook Annual review of marketing materials AQ Academy website	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Process 2: Managing and monitoring education agents **Clause 38.** Signatories must have practices for effectively managing and monitoring the performance and conduct of education agents in relation to learner safety and wellbeing under this code, including – (a) carrying out and recording reference checks on potential education agents to ensure as far as possible that they are not involved in any conduct that is false, misleading, deceptive, or in breach of the law; and	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.			
(b) entering into written contracts with each of its education agents; and	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.			

(c) during the term of a contract, monitoring the activities and performance of its education agents in relation to – i. their obligations as specified in the contract; and ii. whether they provide prospective and enrolled international tertiary learners with reliable information and advice about studying, working, and living in New Zealand; and iii. whether they act with integrity and professionalism in their dealings with prospective and enrolled international tertiary learners; and iv. whether they have engaged in any activity or conduct that, in the opinion of the signatory, is or may be in breach of the law or that jeopardises the signatory's compliance with this code; and	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.
(d) managing the education agents by – i. terminating contracts with an agent if there is evidence which, on balance of probabilities, shows that the education agent – a. has been involved in any serious, deliberate, or ongoing conduct that is false, misleading, deceptive, or in breach of the law; or b. has jeopardised the signatory's compliance with this code; or	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.
ii. taking appropriate action to address misconduct by act or an omission by an education agent in relation to the other matters described in subclause (c); and	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.
(e) ensuring that its education agents have access to, and maintain, up-to-date information relevant to their duties as specified in the contracts with the signatory.	As per AQ Academy Policy, we do not engage with agents to recruit international students or represent us.

Outcome 10: Offer, enrolment, contracts, insurance and visa

Signatories must have practices for enabling learners to make well-informed enrolment decisions in relation to the educational outcomes being sought by the learner and ensuring that all relevant parties are clear about their interests and obligations prior to entering into the enrolment contract.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Offer of educational instruction **Clause 40.** Signatories must ensure that the educational instruction offered to international tertiary learners is in accordance with the Act and is appropriate for international tertiary learners' expectations, English language proficiency, academic ability, and the educational outcomes being sought.	AQ Academy ensures that international learners are enrolled in courses appropriate to their English language proficiency, academic ability, and career goals. Learners are provided with accurate information about programme requirements and expected outcomes before enrolment. As most international learners are employed in New Zealand or hold work visas and are seeking career advancement, training is designed to be relevant to industry and workplace needs/requirements.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Process 2: Information to be provided before entering contract **Clause 41 (1).** Signatories must have practices that ensure prospective international tertiary learners (or the parents or legal guardian of international students under 18 years) receive, as a minimum, accurate, timely and tailored information about the following before entering into a contract with the learner – (a) the most recent results of their evaluations by education quality assurance agencies; and (b) quality improvement or compliance notices and conditions imposed under the Act that the code administrator directs must be disclosed to prospective international tertiary learners; and (c) the education provided and its outcome, for example, whether a qualification is granted; and (d) refund conditions that comply with the process in clause 46; and (e) staffing, facilities, and equipment; and (f) available services and supports; and (g) insurance and visa requirements for receiving educational instruction from the signatory; and (h) this code and the relevant Dispute Resolution Scheme Rules; and (i) full costs related to an offer of educational instruction.	Information regarding AsureQuality's latest external evaluation and review is available on the AsureQuality website. AsureQuality charges course fees after course completion; therefore, withdrawal fees may apply in accordance with the published Terms and Conditions and applicable refund periods. Information about staffing and facilities is communicated through individual course information on the AsureQuality website or via the employer when training is delivered in-house. Information on available learner services and support is provided on the AsureQuality website and within course materials. Insurance and visa requirements are communicated through the enrolment form, student handbook, and AsureQuality website. Information regarding complaints processes and dispute resolution services (DRS) is available on the AsureQuality website and in course materials. Course costs are published on the AsureQuality website. Fees are invoiced following course completion.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Clause 41 (2). Each signatory must ensure that, before entering into a contract of enrolment or enrolling with the signatory, each international tertiary learner (or the parents or legal guardian of international students under 18 years) is informed of the learner's rights and obligations in relation to receiving educational instruction from the signatory, including the rights under this code.	Website information Enrolment form International student handbook Terms and Conditions	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Process 3: Contract of enrolment **Clause 42 (1).** Each signatory must ensure that a contract of enrolment is entered into between the signatory and each international tertiary learner (or the parents or legal guardian of international students under 18 years) that includes the following information and terms – (a) clear information about the beginning and end dates of enrolment; and (b) the grounds for terminating the contract of enrolment; and (c) the circumstances under which the learner's conduct may be in breach of the contract of enrolment; and (d) the type of disciplinary action short of termination of the contract of enrolment, that may be taken by the signatory against the student (for example suspension or exclusion); and (e) the process that the signatory must follow when seeking to terminate the contract of enrolment under paragraph (b) or to take disciplinary action under paragraph (d).	Enrolment form Terms and Conditions, which includes misconduct procedures and actions.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Clause 42 (2). Each signatory must ensure that the contract of enrolment is fair and reasonable.	Enrolment form Terms and Conditions, which includes misconduct procedures and actions.	We have the required practices in place We have sufficient evidence on which to make judgements about		

		the effectiveness of our practices		
Process 4: Disciplinary action **Clause 43.** Any process undertaken under clause 42(1)(e) for terminating the contract of enrolment under clause 42(1)(b) or for taking disciplinary action under clause 42(1)(d) must be in accordance with the principles of natural justice (which includes those necessary to ensure the prompt, considered, and fair resolution of the matter that is the subject of the action).	Terms and Conditions, which includes misconduct procedures and actions.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Process 5: Insurance **Clause 44 (1).** Each signatory must have practices that ensure, as far as practicable, each international tertiary learner who is enrolled with the signatory for educational instruction of 2 weeks' duration or longer has appropriate insurance covering – (a) the international tertiary learner's travel – i. to and from New Zealand; and ii. within New Zealand; and iii. if the travel is part of the educational instruction, outside New Zealand; and (b) medical care in New Zealand, including diagnosis, prescription, surgery, and hospitalisation; and (c) repatriation or expatriation of the international tertiary learner as a result of serious illness or injury, including cover of travel costs incurred by family members assisting repatriation or expatriation; and (d) death of the international tertiary learner, including cover of – i. travel costs of family members to and from New Zealand; and ii. costs of repatriation or expatriation of the body; and iii. funeral expenses.	KnowHow procedures related to enrolling trainees on course. Pastoral Care Code Guidelines policy Note: Most Academy courses are short-duration, non-NZQA courses for employed learners. Those courses with NZQA standards that are over two weeks of duration are for trainees whose training is arranged and paid by their employer.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Clause 44 (2). Subclause (1)(a)(i) and (ii) includes the international tertiary learner's travel to and from their country of origin or citizenship before their educational instruction begins and after it ends (which may be outside of the enrolment period).				

Clause 44 (3). Subclause (1)(a)(i) does not include the international tertiary learner's travel to other countries unless that travel is primarily for the purpose of embarking on connecting flights to and from New Zealand.				
Process 6: Immigration matters **Clause 45.** Signatories must have practices that as far as possible will ensure that international tertiary learners are entitled to study in New Zealand under the Immigration Act 2009, including – (a) ensuring that each international tertiary learner who enrols with the signatory has the necessary immigration status for study in New Zealand; and (b) reporting to Immigration New Zealand known or suspected breaches of visa conditions by international tertiary learners; and (c) notifying Immigration New Zealand of terminations of enrolment.	KnowHow procedures related to enrolling trainees on course which requires to check visa type/expiry and conditions. Pastoral Care Code Guidelines policy	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
Process 7: Student fee protection and managing withdrawal and closure **Clause 46 (1).** Signatories must ensure that – (a) fees paid by international tertiary learners are secure and protected in the event of student withdrawal or the ending of educational instruction or the closure of a signatory; and	Fees are charged post-course as per terms and conditions. Withdrawal fees may apply after the refund period has passed. However, these are processed after the course has finished.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

(b) its refund policies are fair and reasonable; and (c) it provides its international tertiary learners (or the parents or legal guardian of international tertiary learners under 18 years) with sufficient information to understand their rights and obligations under those refund policies.				
Clause 46 (2). A refund policy must include refund conditions for the following situations – (a) failure by an international tertiary learner to obtain a study visa; and (b) voluntary withdrawal by an international tertiary learner; and (c) the signatory ceasing to provide a course of educational instruction as contracted with an international tertiary learner, whether as the result of a decision by the signatory or as required by an education quality assurance agency; and (d) the signatory ceasing to be a signatory; and (e) the signatory ceasing to be a provider.	The AQ Academy invoices for fees after the course end date. The AQ Academy does not arrange/sponsor study visas. Learners are required to be in NZ and hold a valid visa to enrol in our training programmes and meet any entry requirements stated for the courses. Most of the conversations regarding withdrawal fees are facilitated with the employers who pay the fees.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Clause 46 (3). In the situation in subclause (2)(c) or (d), the tertiary signatory must deal with fees paid for services not delivered or the unused portion of fees paid as follows – (a) refund the amount in question to the international tertiary learner (or the learner's parent or legal guardian); or (b) if directed by the international tertiary learner or the code administrator or the agency responsible for fee protection mechanisms, transfer the amount agreed with the student (or the student's parent or legal guardian if the student is under 18 years) to another signatory.	The AQ Academy invoices for fees after the course end date. If the course is not delivered, no fees are charged.	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

Outcome 11: International learners receive appropriate orientations, information and advice

Signatories must ensure that international tertiary learners have the opportunity to participate in well-designed and age-appropriate orientation programmes and continue to receive relevant information and advice to support achievement, wellbeing and safety.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Provision of information **Clause 48.** Signatories must – (a) ensure that information and advice provided by the signatory to international tertiary learners is accurate, age-appropriate, up to date and presented in a way that meets the ongoing needs of diverse learners; and	International student handbook AQ Academy website information Academy team customer service	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(b) ensure that ongoing provision of information and advice is appropriate to the needs of the learner (or the parents or legal guardian of international learners under 18 years) within the particular learning, communal and residential context; and	International student handbook AQ Academy website information Academy team customer service	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(c) provide the names and contact details of designated staff members responsible for international tertiary learner support; and	International student handbook AQ Academy website information Academy team customer service	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

(d) provide appropriate information relating to health and safety of international tertiary learners (including in relation to any disabilities or impairments a learner may have); and	International student handbook AQ Academy website information Academy team customer service	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(e) provide information about the termination of enrolment; and	International student handbook AQ Academy website information Academy team customer service Terms and conditions	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(f) provide information to international tertiary learners (or the parents or legal guardian of international learners under 18 years) about their legal rights and obligations and, where possible, the risks when learners receive or accept advice or services; and	International student handbook AQ Academy website information Academy team customer service Terms and conditions	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(g) provide information about the international tertiary learner's rights and entitlements, including any entitlement to a fee refund, if the learner voluntarily withdraws from the educational instruction; and	International student handbook AQ Academy website information Academy team customer service Terms and conditions - withdrawals	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		

(h) provide each international tertiary learner with full information and advice on – i. all relevant policies of the signatory; and ii. the services, support, and facilities that the signatory offers; and iii. where applicable, how to adjust to a different cultural environment; and iv. where applicable – (a) minimum wages and labour conditions in New Zealand; and (b) maximum hours of work permitted under visa conditions; and (c) how to access information and support regarding employment; and (d) how to report misconduct by employers; and	International student handbook AQ Academy website information	We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices		
(i) for an international tertiary learner under 18 years ensure where applicable, that any parent, legal guardian, or residential caregiver of the learner has access to the information, advice or programme that has been provided to the learner.	AQ's policy states trainees are required to be 18 years old or over to attend the Academy courses.			

Outcome 12: Safety and appropriate supervision of international tertiary learners

Signatories ensure that international tertiary learners are safe and appropriately supervised in their accommodation and effectively communicate with the parents or legal guardian of learners under 18 years.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: International tertiary learners under 18 years **Clause 50.** In relation to international tertiary learners under 18 years, each signatory must have additional practices including – (a) not enrolling an international tertiary learner 10 years or older but under 18 years who does not live with a parent or legal guardian unless – i. the learner is in a properly supervised group of learners whose educational instruction is not for more than 3 months; or ii. the learner is in the care of the manager of tertiary student accommodation covered in Part 5 of this code; or iii. the learner is in the care of a residential caregiver; and	AQ's policy states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses.			
(b) maintaining effective communications with the parents, legal guardian, or residential caregivers of international tertiary learners concerning their wellbeing and progress in study; and	AQ's policy states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses.			
(c) ensuring that at least 1 staff member is designated to proactively monitor and address any concerns about international tertiary learners under 18 years; and	AQ's policy states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses.			

(d) if the international tertiary learner is in the care of a residential caregiver, – a. ensuring that a plan is in place for the transfer of care of the learner from the residential caregiver to the learner's parent or legal guardian, or another person approved by the parent or legal guardian, for – (a) each transfer that occurs during the period of enrolment; and (b) the transfer that occurs at the end of enrolment; and b. ensuring that the parent or legal guardian is notified of each transfer plan.	AQ's policy states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses.
Process 2: International tertiary learners under 10 years **Clause 51 (1).** Each signatory must ensure that its international tertiary learners under 10 years live with a parent or legal guardian	As per AQ Policy, AQ Academy does not enrol students under 10 years old We have the required practices in place We have sufficient evidence on which to make judgments about
Clause 51 (2). The requirements in clauses 49 and 50 apply, in addition to this clause, to international tertiary learners who are under 10 years.	[redacted]
Process 3: Decisions requiring written agreement of parent or legal guardian **Clause 52.** Each signatory must ensure that, where appropriate, it obtains the written agreement of the parent or legal guardian of an international tertiary learner under 18 years with respect to decisions affecting the learner.	AQ's policy states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses.

Process 4: Accommodation for international tertiary learners under 18 years **Clause 53 (1).** In relation to an international tertiary learner under 18 years who is in the care of a residential caregiver while living in accommodation that is **not subject to Part 5** of this code, the signatory must – (a) ensure that the learner's accommodation is safe, is in acceptable condition, and meets all regulatory and legislative requirements; and	AQ's policy also states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses. AQ Academy does not arrange or provide accommodation to any trainees, whether domestic or international on work visas.
(b) ensure that the safety check referred to in clause 54 is completed and is up to date; and	AQ's policy also states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses. AQ Academy does not arrange or provide accommodation to any trainees, whether domestic or international on work visas.
(c) ensure that an appropriate check is completed and is up to date for each person who is 18 years or over and who resides at the residential caregiver's accommodation, for the purpose of ensuring the safety of the learner; and	AQ's policy also states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses. AQ Academy does not arrange or provide accommodation to any trainees, whether domestic or international on work visas.
(d) have a written agreement with the residential caregiver that specifies the role and responsibilities of each party in relation to the care of the learner; and	AQ's policy also states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses. AQ Academy does not arrange or provide accommodation to any trainees, whether domestic or international on work visas.
(e) maintain effective communication with the learner and the learner's parent or legal guardian when accommodation issues arise, and take responsibility for addressing those issues, including reporting them to relevant authorities and moving learners to appropriate accommodation; and	AQ's policy also states trainees who are not domestic students are required to be 18 years old or over to attend the Academy courses. AQ Academy does not arrange or provide accommodation to any trainees, whether domestic or international on work visas.
(f) conduct sufficient learner interviews and home visits to monitor and review the quality of residential care, taking into consideration the age of the learner, the length of the stay, and other relevant factors; and	

(g) if the learner's residential caregiver is a designated caregiver ensure that the parent or legal guardian of the learner has provided written agreement that the designated caregiver will be subject to the signatory's approval and that the signatory is not responsible for the learner's day-to-day care when the learner is in the custody of the designated caregiver; and (h) if the learner's residential caregiver is a supervisor described in clause 54(3), ensure that the parent or legal guardian of the learner has provided written agreement that the signatory is not responsible for the learner's day-to-day care when the learner is in the custody of that supervisor; and (i) ensure that there is appropriate separation of international tertiary learners from others of different ages in the accommodation; and (j) ensure that the learner is appropriately supervised in the accommodation.	
Clause 53 (2). For the purposes of clause 53(1)(c), a person who is 18 years or over and who resides at the residential caregiver's accommodation includes a person of that age who – (a) temporarily resides at that accommodation; or (b) is or will be residing at that accommodation for 1 or more periods in any month (whether or not for valuable consideration), each period of which is 5 or more consecutive nights.	AQ does not arrange or provide accommodation to trainees over 18 years old, whether domestic or non-domestic.
Clause 53 (3). To avoid doubt, if the residential caregiver is a supervisor described in clause 54(3) or a designated caregiver, the signatory must meet the requirements of this clause and ensure the safety, health, and wellbeing of the international tertiary learner.	AQ does not arrange or provide accommodation to trainees over 18 years old, whether domestic or non-domestic.

Process 5: Safety checks and appropriate checks for learners under 18 years **Clause 54 (1).** The safety check for the residential caregiver referred to in clause 53(1)(b) must include – (a) a confirmation of identity; and	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.
(b) a reference check that includes contacting at least 1 of the following persons or bodies for the purpose of obtaining information that the signatory considers relevant to a risk assessment – i. the residential caregiver's current or previous employer, professional body, or registration authority; and ii. the licensing authority that is relevant to the residential caregiver's business or professional activities; and iii. a person who is not related to the residential caregiver; and	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.
(c) a police vet, to obtain information that is relevant to a risk assessment; and	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.
(d) an interview with the residential caregiver, to obtain information that the signatory considers relevant to a risk assessment; and	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.
(e) a risk assessment that takes into account all of the information that was obtained under paragraphs (a) to (d), to determine whether the residential caregiver poses a risk to the safety of the international tertiary learner; and	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.

Clause 54 (2). The safety check for the residential caregiver referred to in clause 53(1)(b) is **up to date** if it is completed within 3 years after the date of the latest safety check.	AQ does not arrange or provide accommodation to trainees under18 years old, whether domestic or non-domestic.
Clause 54 (3). Subclause 53(1)(b) to (e) does not apply to a residential caregiver who – (a) is a supervisor referred to in paragraph (e) of the definition of residential caregiver in clause 5(1); and (b) is not a resident of New Zealand; and (c) is travelling with, and accompanying, the international tertiary learner for the purpose of supervising them during the learner's educational instruction.	[redacted]
Clause 54 (4). An appropriate check referred to in clause 53(1)(c) is **up to date** if it is completed within 3 years after the date of the latest check.	
Process 6: Accommodation for international tertiary learners 18 or over **Clause 55 (1).** In relation to an international tertiary learner 18 years or over who lives in accommodation provided or arranged by a signatory and **not subject to Part 5**, the signatory must – (a) ensure that the learner's accommodation is safe, is in acceptable condition, and meets all regulatory and legislative requirements; and	AQ does not arrange or provide accommodation to trainees 18 years or over, whether domestic or non-domestic.as stated on international student handbook and guidelines

(b) maintain effective communication with the learner when accommodation issues arise, and must take responsibility for addressing those issues, including reporting them to relevant authorities.	AQ does not arrange or provide accommodation to trainees 18 years or over, whether domestic or non-domestic.as stated on international student handbook and guidelines
Clause 55 (2). In this clause, accommodation issues include issues of health and wellbeing arising from a learner's accommodation or connected with it.	[redacted]

PART 2: Action Plan

For the period: 01/07/2026 to 30/06/2027

- Based on our analysis, what do we need to do differently in the coming year?
- Who is responsible for implementing the planned next steps, and by when?
- How will we monitor our plan to ensure that it is implemented?
- How will we know that the actions we took were successful?

Action #	Action/s to be taken	Owner	Due date	Plan for monitoring implementation	Measures of success	Status	Outcomes the action relates to
001	Progress Academy Māori Strategy actions for financial year 2026-2027 which are grouped into these topics: - Relationship building - Strengthening staff cultural capability - Creating inclusive and welcoming learning environment for Māori - Increasing awareness of AQ Academy training opportunities for Māori.	L.S	01/06/2027	Monthly Meetings with GM Māori Strategy and Engagement	Refer to Academy Māori Strategy and Actions 2026-2027	**In progress**	**Outcome 1:** A learner wellbeing and safety system **Outcome 3:** Safe, inclusive, supportive, and accessible physical and digital learning environments
002	AQ Interim Report 2027 - Review, update, and publish the Academy's strategic goals and plans on the for supporting learner wellbeing and safety, ensuring they reflect current priorities, continuous improvement activities, and outcomes from previous reviews.	L.S.	01/06/2027	Review and update the Academy section of the AQ Annual Interim Report annually. Liaise with Marketing to ensure the report clearly communicates the Academy's strategic goals and priorities for learner wellbeing and safety, progress against existing plans, and outcomes and improvements arising from previous reviews.	Interim Report 2027 published with information presented clearly, accurately, and in a format appropriate for its intended audience.	**Pending**	**Outcome 1:** A learner wellbeing and safety system **Outcome 2:** Learner voice

003	Collaborate with the Health, Safety and Wellbeing Team to identify opportunities for publishing more targeted student wellbeing information and resources on the Academy website.	IBL	01/03/2027	Monitor progress at Academy H&S and Wellbeing meetings Regular catch ups with H&S Business Partner	Updated section on Academy website	**In progress**	**Outcome 1:** A learner wellbeing and safety system **Outcome 2:** Learner voice
004	Ensure learners can access and provide feedback on physical and digital learning environments following the transition to the new SMS.	J.C	01/07/2026	Review and update survey links and QR codes following the implementation of the new SMS to ensure learner feedback is being collected through the correct systems and that data remains accessible, accurate, and complete	Data records of feedback	**Completed**	**Outcome 3:** Safe, inclusive, supportive, and accessible physical and digital learning environments

PART 3 - Complaints and Critical Incidents 2025-2026

Complaints

Definition of a complaint: A complaint is any expression of dissatisfaction with a product or service, whether justified or not, that if unresolved would have an adverse impact on the customer relationship – *AQ Customer Complaint Reference Guide.*

System Reviews:

Related Process	Last Review/Edited date	Next Review Date	Summary of improvements:
Manage Academy Feedback or Complaints	August 13, 2026	Jan 28, 2027	Added a template for acknowledging receipt of feedback and complaints.
Log customer complaint or feedback in customer care portal	Feb 19, 2026	Feb 25, 2028	Tags were updated, minor change

Data reporting:

Date	Nature of complaint	Status	Resolution
2025	*No complaints to Academy in 2025*		
12/02/2026	No product available	Closed – 17/02/2026	Academy will create product to meet updated legislation
25/03/2026	Trainer Competency	Closed – 25/03/2026	Updated competency framework Revision of Trainer scope

Critical Incidents

Definition of a critical incident: A critical incident is also defined as a notifiable event which means all incidents (injury and non-injury) that require reporting to the regulator.

System Reviews:

Related Process	Last Review/Edited date	Next Review Date	Summary of improvements:
Managing a student notifiable event (critical incident)	Aug 13, 2026	Aug 13, 2027	Inclusion of terminology “Notifiable event”

Data Reporting:

Date	Critical Incident category	Status	Actions
No critical incidents in Academy BU in 2025 and 2026			