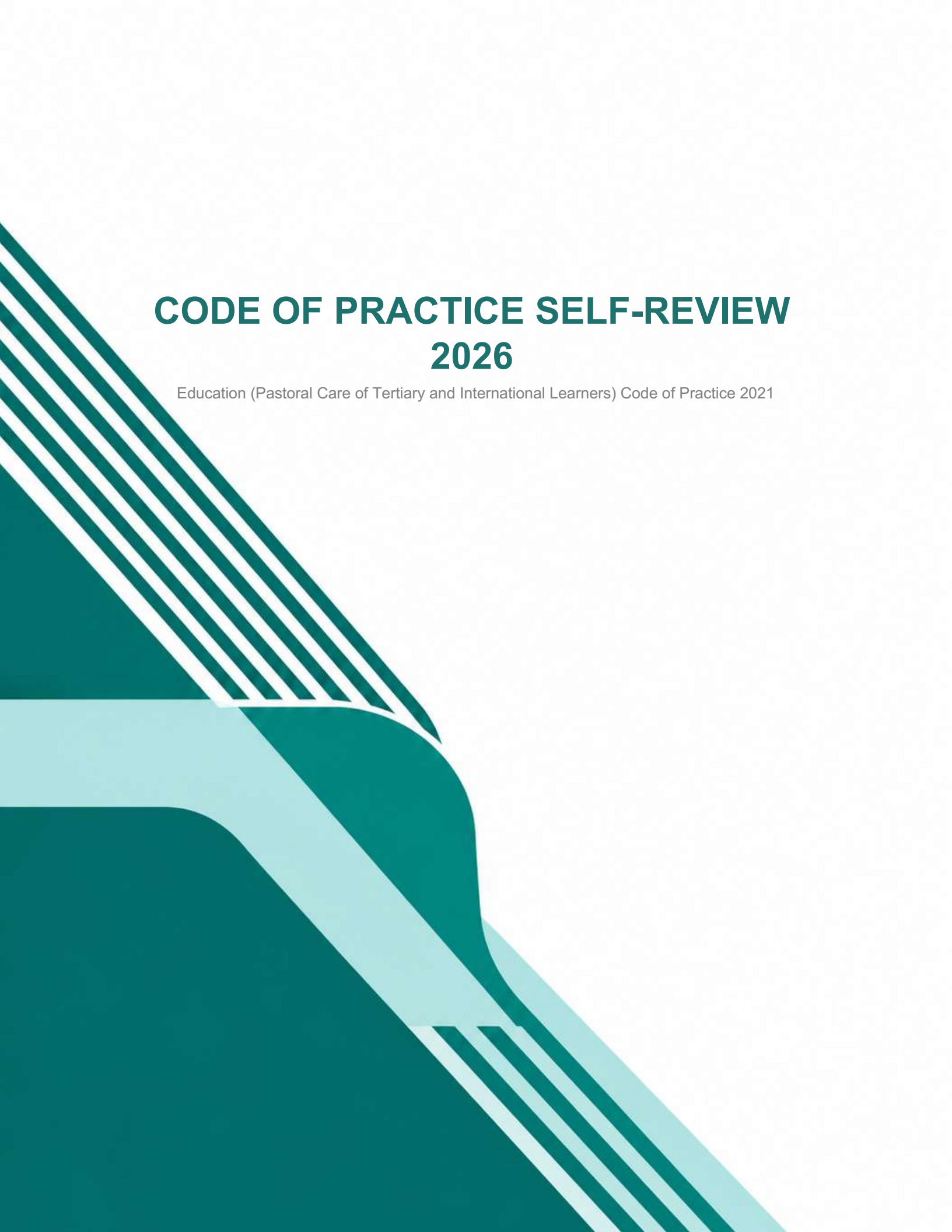




# **CODE OF PRACTICE SELF-REVIEW 2026**

Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021

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## REVIEW PERIOD

Current ownership review period: 12 May 2025 to 3 October 2026. Links Training delivers domestic tertiary training only and does not arrange, provide or operate student accommodation. Accordingly, this review focuses on Code Outcomes 1- 4, which apply to all tertiary education providers.

## OVERALL FINDING

Links has a substantial operational foundation for learner wellbeing and safety.

Many practices documented in the 2024 Code review have continued and been strengthened since the May 2025 acquisition.

The main opportunity is to make the system more integrated, consistently evidenced and governance-led: bringing learner feedback, wellbeing, safety, assessment, moderation, incidents and improvement actions together through a documented monthly quality/governance process and a connected QIP.

## 1. PURPOSE AND APPROACH

This self-review records how Links Training gives effect to the Code requirements that apply to its current delivery model. It has been completed as part of the organisation's wider 2026 TEO self-review and quality improvement process. The review is proportionate to Links as a small PTE delivering predominantly short, practical First Aid programmes.

The review used the NZQA Outcomes 1 - 4 self-review framework and considered current practice, management evidence, learner feedback processes, assessment and moderation activity, staff capability, health and safety controls, Arlo implementation, safeguarding, privacy, public information, governance and historical Code review material. It also compares current practice with the published 2024 Code self-review to identify continuity, strengthened practice and areas requiring further formalisation.

## PROVIDER PROFILE

|                               |                                                               |
|-------------------------------|---------------------------------------------------------------|
| TEO                           | Links Training (2008) Ltd                                     |
| MoE / NZQA provider number    | 7901                                                          |
| Learner scope                 | Domestic tertiary learners only; occasional learners under 18 |
| Student accommodation         | Not provided or arranged                                      |
| Annual Code self-review owner | General Manager                                               |
| Governance verification       | Director                                                      |

## 2. EVIDENCE BASE AND CONTINUITY FROM THE 2024 REVIEW

- Links' published 2024 Code review recorded established practices in learner feedback, barriers-to-learning identification, venue checks, H&S inductions, learner support, complaints handling, incident reporting, accessibility and staff discussion of wellbeing and safety matters.
- Since the acquisition on 12 May 2025, Links has retained many of these practices while progressively shifting responsibility to the current General Manager, Office Manager and Director and strengthening evidence through Arlo and the developing compliance system.
- The 2026 Transformation (Strategic) Plan and policy workplan provide the current organisational framework for quality, learner success, Te Tiriti-informed practice and continuous improvement.
- Current learner evaluations are reviewed for trends, used to improve delivery/resources and analysed quarterly. A redesigned Arlo-based evaluation is under development.
- Health and Safety remains a standing team meeting agenda item. Formal new-venue reviews, day-of-delivery safety checks and learner emergency inductions are in place.
- Assessment and moderation issues are fed back to relevant facilitators and can be converted into team learning activities, with follow-up at defined milestones.
- Current ownership has confirmed zero complaints, zero critical incidents and zero known privacy breaches from 12 May 2025 to 3 October 2026.

### 3. OUTCOME 1 - A LEARNER WELLBEING AND SAFETY SYSTEM

| Code process                                  | What Links does now                                                                                                                                                                                                                                                                                           | Evidence / how we know                                                                                               | Effectiveness judgement        | Improvement / next step                                                                                                                                                                                             |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic goals and plans                     | The 2026-2029 Transformation Plan places learner success, quality, equity, learner voice, Te Tiriti-informed practice and self-review within organisational priorities. Since acquisition, the GM has led policy, quality and compliance development.                                                         | Transformation Plan; policy workplan; team meeting records; management review activity.                              | Implemented with strengthening | Move from historically informal management oversight to a structured monthly Quality & Performance / governance meeting with standing quality metrics, minutes and actions.                                         |
| Self-review of wellbeing and safety practices | Learner evaluations are reviewed after delivery, used to identify trends and improve delivery/resources, and analysed quarterly. H&S, assessment, moderation, trainer performance and learner outcomes are also reviewed, but historically as separate streams.                                               | Quarterly evaluation analysis; H&S records; moderation; trainer meetings; Arlo learner records.                      | Implemented with strengthening | Integrate the separate data streams into one documented quality view; record wellbeing/support trends and whether support interventions were effective.                                                             |
| Publication requirements                      | Historical 2023 and 2024 Code reviews are publicly available. Current course information and terms are public. The 2026 Code self-review/public summary is being prepared for publication.                                                                                                                    | Links website; 2024 Code review; current course pages and Terms & Conditions.                                        | Developing                     | Publish the 2026 summary and create a dedicated Learner Wellbeing / Code page. Implement quarterly review of public-facing information. Verify full-year 2025 complaints/critical incident data before publication. |
| Responsive wellbeing and safety systems       | Facilitators identify concerns, speak privately with learners, agree support, escalate serious matters to the GM and contact emergency services where required. Incidents/near misses use a formal report and register with GM review and one-month follow-up. Serious matters are escalated to the Director. | Near Miss/Incident Report Form and register; Arlo support records; team meeting minutes; emergency/venue procedures. | Strong operational practice    | Formalise complaints and critical incident registers within the new system, including nil returns; document privacy breach and safeguarding record processes.                                                       |

#### 4. OUTCOME 2 - LEARNER VOICE

| Code process                          | What Links does now                                                                                                                                                                                                                                                                                                                | Evidence / how we know                                                                                                | Effectiveness judgement        | Improvement / next step                                                                                                                                                                       |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Learner voice                         | Learners can give feedback directly to tutors during delivery and through voluntary end-of-workshop evaluations. Feedback moves from tutor to Office Manager/GM where relevant. Evaluations are reviewed for trends and analysed quarterly; delivery and resources are changed in response. Employer/client feedback is also used. | Evaluation forms and quarterly summaries; team minutes; client emails/records; examples of resource/delivery changes. | Implemented                    | Introduce a visible quarterly "You Said - We Did" loop and complete the redesigned Arlo evaluation, including cultural safety/belonging questions and improved outcome measures.              |
| Learner complaints                    | Learners can complain directly to the GM by email. The GM clarifies and documents the issue, investigates perspectives/evidence, provides updates and a proposed resolution, escalates serious matters to the Director and monitors improvement actions. Zero complaints have been confirmed since acquisition.                    | Complaints process; GM records if activated; planned Complaints Register; learner information.                        | Implemented with strengthening | Make the pathway more explicit in the revised Welcome Book and website, including the external NZQA escalation/dispute pathway; maintain a formal complaints register with nil-return review. |
| Dispute resolution / external pathway | Links has an internal complaints and assessment appeals pathway, but current learner-facing information does not yet clearly explain the Code or external NZQA escalation pathway.                                                                                                                                                 | Current Welcome Book; website review; appeals process.                                                                | Developing                     | Add plain-language Code, complaints, appeals and external escalation information to learner-facing materials and the website.                                                                 |

## 5. OUTCOME 3 - SAFE, INCLUSIVE, SUPPORTIVE AND ACCESSIBLE PHYSICAL AND DIGITAL LEARNING ENVIRONMENTS

| Code process                           | What Links does now                                                                                                                                                                                                                                                                                                                                                                                 | Evidence / how we know                                                                                    | Effectiveness judgement        | Improvement / next step                                                                                                                                                |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Safe and inclusive communities         | Programme welcomes set clear expectations for respectful and inclusive behaviour. Bullying, harassment, discrimination or culturally unsafe conduct is escalated to the GM; learners can bypass a tutor and contact Office Manager/GM directly. Te reo Māori, tikanga, manaakitanga, āwhinatanga and tautokotanga are being progressively embedded.                                                 | Welcome/induction practice; team meeting records; safeguarding/complaints processes; Transformation Plan. | Implemented with strengthening | Continue staff cultural capability development and use the new Arlo evaluation to gather more explicit Māori and Pasifika learner voice.                               |
| Learner participation and engagement   | Support needs are prompted at registration, raised again at course commencement and monitored during delivery. Facilitators privately confirm support arrangements and can provide extra tuition, additional time, support people, literacy/language assistance and interpreters without reducing the competency standard.                                                                          | Registration process; Arlo notes; tutor practice; learner records; evaluation feedback.                   | Strong operational practice    | Begin recording the outcome/effectiveness of significant support interventions so Links can evidence whether support enabled participation, completion or achievement. |
| Physical and digital spaces/facilities | New public venues receive a formal Office Manager safety/suitability/accessibility review. Tutors arrive at least 30 minutes early and repeat a venue check; unresolved safety issues can stop/reschedule the course. Learners receive emergency/evacuation information. Arlo uses role-based access, individual logins and MFA; office support is available for digitally less confident learners. | Venue review/checklists; H&S meeting records; Arlo permissions; day-of course practice.                   | Strong operational practice    | Continue quarterly public/digital learner-journey testing and retain evidence through the developing compliance system.                                                |

## 6. OUTCOME 4 - LEARNERS ARE SAFE AND WELL

| Code process                              | What Links does now                                                                                                                                                                                                                                                                                                                                        | Evidence / how we know                                                         | Effectiveness judgement        | Improvement / next step                                                                                                                                                                |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Information about basic needs and support | Learners receive confirmation/welcome information before training and a physical Learner Welcome Book. The current Welcome Book is being updated to add national support contacts, Code information, rights/responsibilities, complaints and appeals information.                                                                                          | Welcome Book; Arlo emails; learner communications.                             | Implemented with strengthening | Complete and approve the revised Welcome Book and learner support information; include national support contacts and external complaint/appeal pathways.                               |
| Physical and mental health awareness      | Facilitators privately check in with distressed/unwell learners and agree a plan. Significant needs can be escalated to the GM, who has social work/pastoral care experience, with the Office Manager acting as conduit to external supports. Consent is sought before sharing information unless immediate safety/lawful disclosure considerations apply. | Arlo support records; facilitator/GM practice; incident records.               | Implemented                    | Document external support contact information and record, where appropriate, whether support interventions achieved their intended outcome.                                            |
| Proactive monitoring and response         | No critical incidents have been confirmed since acquisition. Serious medical/safety/wellbeing events require immediate emergency response, GM notification, Director oversight, detailed documentation and follow-up. Other incidents/near misses are formally reported, registered and reviewed within one month.                                         | Near Miss/Incident form and register; H&S agenda/minutes; escalation practice. | Implemented with strengthening | Embed formal Critical Incident Register and safeguarding documentation in the new compliance system; Code-specific staff briefing in Q1 2027 and standing Code agenda item thereafter. |

## 7. CROSS-CUTTING ASSURANCE FINDINGS

### Assessment And Moderation

Assessment records are signed and dated by facilitators; amendments preserve traceability and are explained to learners. Reassessment/resubmission opportunities are available where permitted. Office Manager verifies assessment evidence before monthly NZQA reporting. Moderation findings are fed back to facilitators and can become team learning activities. A clearer current Links-specific assessment authenticity/integrity process should be formally documented.

### Learner Records And Privacy

Physical assessment records are securely retained for seven years and securely destroyed by a destruction provider, with evidence retained. Arlo access is role-based, staff use individual accounts and MFA, and access is removed when no longer required. The GM is designated Privacy Officer. No known privacy breaches have occurred since acquisition. A written privacy breach procedure is being formalised.

### Staff Capability

New facilitators receive induction covering policy, delivery, assessment, learner support/wellbeing, H&S and complaints/escalation, then shadow experienced trainers before independent delivery. GM observations occur at three and six months. A rotational observation programme commences 8 October 2026, targeting at least annual observation and ideally twice yearly across different courses.

### Safeguarding Younger Learners

Links occasionally trains learners under 18, most commonly through employer or externally coordinated bookings. A Child Protection/Safeguarding Policy is in place and teaching staff were Police Vetted in late 2025. Age and parent/guardian/emergency contact information are available. Safeguarding concerns escalate to the GM. Formal safeguarding case documentation is being developed and clarified.

### Skills Standards Transition

Links is developing its new First Aid programme with a planned 1 July 2027 launch, subject to ISB/NZQA processes. Tutors are being progressively briefed; staff readiness, implementation and monitoring plans are being developed; Arlo and website settings will be quality-checked before launch; early delivery will be monitored through observation, moderation and learner feedback.

## 8. OVERALL EVALUATION

### KEY STRENGTHS

Learner-centered support; established learner feedback and quarterly analysis; strong venue and day-of-delivery safety controls; responsive complaints/escalation practice; role-based privacy controls; formal incident/near-miss process; assessment verification before NZQA reporting; active moderation-to-learning cycle; progressive cultural capability development; structured facilitator induction and observation.

### KEY IMPROVEMENTS IDENTIFIED

Integrated monthly quality/governance oversight; formal public 2026 Code summary; “You Said - We Did” communication; revised Arlo evaluation; updated Welcome Book and website Code information; Code-specific staff development; formal complaints/critical incident registers with nil returns; privacy breach procedure; safeguarding case documentation; assessment authenticity/integrity process; quarterly GM sampling of learner records; documented effectiveness of learner support.

## 9. PRIORITY QUALITY IMPROVEMENT PLAN LINKS

- QIP-01 Publish the 2026 Code self-review summary and verify the full-calendar-year 2025 complaints/critical incident data before publication.
- QIP-02 Implement the structured monthly Quality & Performance / governance meeting and integrated quality dashboard.
- QIP-03 Introduce quarterly “You Said - We Did” reporting and implement the redesigned Arlo learner evaluation.
- QIP-04 Complete the revised Learner Welcome Book and dedicated Learner Wellbeing / Code webpage.
- QIP-05 Implement Q1 2027 Code staff briefing and make Code responsibilities a standing team agenda item.
- QIP-06 Implement the new compliance system for policies, staff acknowledgements, evidence, registers, vetting/currency and audit trail.
- QIP-07 Formalise privacy breach and safeguarding documentation processes.
- QIP-08 Formalise assessment authenticity/integrity expectations and make appeals information explicit to learners.
- QIP-09 Introduce quarterly GM sampling of assessment evidence, Arlo records and NZQA reporting.
- QIP-10 Continue tutor observation rotation and controlled implementation/monitoring of the new Skills Standards programme.

## 10. COMPLAINTS, CRITICAL INCIDENTS AND PRIVACY DATA

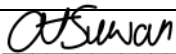
| Period                   | Complaints | Critical incidents | Comment                                                                                                                                                                   |
|--------------------------|------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Jan 2025 - 31 Dec 2025 | 0          | 0                  | Confirmed by current ownership for the post-acquisition period. Final archival check required for 1 Jan - 11 May 2025 before publishing the full-year 2025 annual figure. |
| 1 Jan 2026 - 3 Oct 2026  | 0          | 0                  | Confirmed year-to-date.                                                                                                                                                   |

## 11. EVIDENCE REGISTER

| Ref | Evidence                                                                 | Status                           | Code outcome   |
|-----|--------------------------------------------------------------------------|----------------------------------|----------------|
| E01 | 2026-2029 Transformation (Strategic) Plan                                | Available                        | Outcomes 1-4   |
| E02 | 2024 published Code self-review                                          | Public / historical baseline     | Outcomes 1-4   |
| E03 | Learner evaluations and quarterly analysis                               | Available; consolidate           | Outcomes 1-4   |
| E04 | Team/trainer meeting agendas and minutes                                 | Available                        | Outcomes 1-4   |
| E05 | Venue review and day-of-delivery safety checks                           | Available                        | Outcome 3      |
| E06 | Near Miss / Incident Report Form and H&S register                        | Available                        | Outcomes 1,3,4 |
| E07 | Arlo registration, communications and access settings                    | Available                        | Outcomes 1-4   |
| E08 | Learner Welcome Book                                                     | Available; revision underway     | Outcomes 2-4   |
| E09 | Child Protection / Safeguarding Policy and staff Police Vetting evidence | Available                        | Outcomes 1,3,4 |
| E10 | Assessment, moderation and NZQA reporting records                        | Available                        | Outcomes 1-4   |
| E11 | Tutor induction and observation form/checklist                           | Available / programme commencing | Outcomes 1,3,4 |
| E12 | Complaints and Critical Incident Registers                               | In development in new system     | Outcomes 1,2,4 |
| E13 | Privacy breach process / Privacy Officer record                          | To formalise                     | Outcomes 1,4   |
| E14 | 2026 public Code self-review summary                                     | To publish                       | Outcome 1      |

## 12. APPROVAL AND ANNUAL REVIEW

The General Manager is responsible for coordinating the annual Code self-review, maintaining the connected QIP and ensuring the approved public summary is published and remains accessible until replaced by the following year's summary. The Director provides formal verification and governance approval. QIP progress is overseen through the monthly management/governance meeting.

|                                  |                                                                                   |
|----------------------------------|-----------------------------------------------------------------------------------|
| Prepared by                      | General Manager                                                                   |
| Director verification            | Courtenay Hurt-Suwan                                                              |
| Approval date                    | 4/10/2026                                                                         |
| Director sign-off / confirmation |  |

## REFERENCES

### NZQA - Self-review and attestation:

<https://www2.nzqa.govt.nz/tertiary/the-code/the-code-for-education-providers/self-review-and-attestation/>

### NZQA - Code self-review tools:

<https://www2.nzqa.govt.nz/tertiary/the-code/the-code-for-education-providers/self-review-and-attestation/self-review-tools/>

### NZQA - TEO self-review summary report:

<https://www2.nzqa.govt.nz/tertiary/quality-assurance/self-review/summary-report/>

### NZQA - TEO self-review:

<https://www2.nzqa.govt.nz/tertiary/quality-assurance/self-review/>

### NZQA - July 2026 Code News:

<https://www2.nzqa.govt.nz/about-us/publications/newsletters-circulars/code-news/july-2026-tep/>

### NZQA - Code 101 Outcomes 1-4:

<https://www2.nzqa.govt.nz/assets/Tertiary/The-Code/code-101-workshop-outcomes-1-4-presentation.pdf>

### Links Training - 2024 Code Review:

<https://links-ltd.co.nz/wp-content/uploads/2024/10/Review-2024V2.pdf>

### Links Training website:

<https://links-ltd.co.nz/>