

**New Zealand Qualifications Authority Monitoring Report  
Manaakitanga Aotearoa Charitable Trust (7527)  
30 March 2015**

## **Executive Summary**

Manaakitanga Aotearoa Charitable Trust (MACT) has ready access to the people, networks, and knowledge that are required to deliver high quality Māori performing arts programmes.

Despite that, the New Zealand Qualifications Authority (NZQA) has identified numerous and significant breaches by MACT of its obligations as a registered private training establishment (PTE), including failure to comply with rules relating to registration, record keeping, programme approval and accreditation, and consent to assess against standards.

MACT's management, administration, delivery and assessment practices in recent years have seriously undermined NZQA's confidence in the integrity of the national qualifications that MACT has awarded, and in MACT's capability to meet the standards required of a registered PTE.

Since NZQA's monitoring visit in October 2014, MACT has increased the rigour of its documentation and record keeping. This indicates that MACT has the capability and capacity to deliver, assess, and report appropriately if stronger systems and greater accountability were to be established.

## **Background**

NZQA staff conducted a monitoring visit to MACT on 2–3 October 2014, accompanied by Deloitte (on behalf of the Tertiary Education Commission (TEC)).

Particular attention was given to:

- student enrolment and academic records
- delivery and assessment methodology
- evidence of authentic and valid assessment having taken place
- staffing and sub-contracting arrangements.

Information sources included programme documentation, administrative data, student files, interviews with staff and students, and assessment material, where this was available.

MACT was provided with NZQA's draft findings on 25 November 2014, and made a submission including additional administrative records and assessment material. This final report takes MACT's submission into consideration.

## **Programmes delivered**

The National Certificate in Māori Performing Arts (Performance) – Level 4 and National Diploma in Māori Performing Arts (Tutoring) – Level 6 are both 120 credit programmes: each equivalent to one year of full-time study, and funded by TEC at 1 EFT per student. These programmes are referred to in this report as the “National Certificate” and “National Diploma” respectively.

MACT has had consent to assess against unit standards in the Māori Performing Arts subfield to Level 8 of the New Zealand Qualifications Framework since 2002, when it was first registered as a PTE.

Since that time, students studying at MACT who achieved all the relevant unit standards for either the National Certificate or the National Diploma, were entitled to be awarded their completed qualification by NZQA.

In January 2013, following a change to the Education Act 1989 which required all PTEs to provide at least one programme or training scheme, MACT was granted accreditation to provide programmes leading to the award of the National Certificate and the National Diploma.

Students who complete the National Diploma are eligible to enrol directly into the second year of the three-year Ngā Mana Whakairo a Toi: Bachelor of Māori Performing Arts (BMPA) degree programme, which has been offered on-campus through Te Whare Wānanga o Awanuiārangi.

It is surprising to see, however, that significant numbers of MACT's students have already completed part or all of the BMPA course prior to enrolling for the Certificate or Diploma at MACT, and many study the BMPA concurrently with the Certificate and/or Diploma. This raises questions about the value of MACT's courses for these students. MACT asserts that there is relevance for learners wanting to engage in MACT's programmes as well as the BMPA.

In addition to the Māori Performing Arts subfield, MACT has consent to assess a range of other subfields and domains up to Level 4.

### Student numbers

Between 2009 and 2013, TEC funded on average 84 students (EFTS) per year to study towards the National Certificate or National Diploma.

Table 1 shows the number of students recorded as having been enrolled, by source, over the last three years. It also shows the number of qualifications reported to NZQA by MACT, which is significantly lower.

<i>Table 1: enrolments and qualifications by source</i>	TEC enrolment list	MACT student list	Completed qualifications reported to NZQA
<b>Certificate</b>			
2012	19	20	7
2013	50	50	7
2014	*73	*73	n/a
<b>Total 2012-14</b>	<b>142</b>	<b>143</b>	
<b>Diploma</b>			
2012	75	75	11
2013	42	46	2
2014	*8	*8	n/a
<b>Total 2012-14</b>	<b>125</b>	<b>129</b>	

\* MACT advises that four Diploma students were incorrectly enrolled on the Certificate programme in 2014. The numbers should be modified accordingly.

## **Administration and record keeping**

A sampled match of TEC enrolment data, NZQA student achievement data, and MACT student lists revealed significant administrative problems. For example:

- Students whose NZQA Record of Achievement showed that MACT had awarded them their qualification and unit standards well before they appeared on the TEC and/or MACT student lists.
- Students who were enrolled for the Diploma in one year, and the Certificate the following year.
- Students whose records indicate that they were concurrently enrolled for the Certificate and the Diploma. (MACT acknowledges that this did happen in some cases in the past.)
- Students who had previously completed unit standards with a different provider, who were then enrolled to do them again at MACT.

MACT reported unit standards to students' NZQA Records of Achievement for fewer than 15 per cent of its 2013 students. In contrast, it reported to TEC that 100 per cent of the 2013 students had completed the qualification that they were enrolled for. MACT acknowledges this issue, and states that in response it has made improvements to its student management system and reporting processes.

MACT staff were unable to explain to NZQA staff at the visit how they would source data about student completions if requested.

The staff member responsible for administration during the period 2009–2014 acknowledged that she had made errors during this period, that she had not been confident in her role, and that she had not felt able to ask for help. There is a newly appointed Academic Administrator, but she is not yet familiar with the role and reporting processes, and was unaware of the problems.

As recently as July 2014, tutors have been reporting to MACT management that they are not provided with students' Records of Achievement, and therefore do not know what students have completed in the past. Some students have been enrolled who had already completed the qualification or parts of it in previous years. One roopu profile stated that a particular Wero had five tauira completing the Diploma. This is of concern because all other enrolment data shows that students from this Wero are only enrolled in the Certificate.

The Executive Director acknowledged that there had been inadequate oversight of the administrative staff, and MACT accepted in its submission that there have been "administrative flaws" in its reporting and enrolment processes.

The poor standard of administration over an extended period of time also means that it is difficult to have confidence in the validity of unit standards and qualifications that have been reported, or in the Educational Performance Indicators that MACT has reported having achieved. Data integrity issues are systemic. MACT acknowledges these issues.

## **Programme delivery**

Only a small number of students (8 in 2014) study on-campus. These students are experienced performers, and the intention is that they are selected by audition. The remaining students are distributed across different cohorts (Wero) – some locally, and others further afield. For example, in 2014, there were five off-site Wero: three based in Rotorua, one in Matamata, and one in Queenstown. The MACT campus is the only site that has been

approved by NZQA.

It seems that some of the teaching of the off-site Wero is being informally sub-contracted to members of the community. For example, one facilitator stated in her August report,

*"I was extremely pleased to find that the tauira from Queenstown have completed most practical aspects of both the Level 2 and Level 4 achievement standards for Moteatea, Waiata-a-Ringa, Haka, and Poi. Clear guidance has been given as to what is expected of them this month and I will return at the end of September early October to both record all practical evidence and also their written components."*

MACT has explained that these students are supported by their school's Head of Department Māori, who is in turn supported by a MACT staff member. Regardless of this, MACT has not maintained an appropriate level of responsibility for delivery of the programme as the registered and accredited body. MACT does not have NZQA approval to sub-contract its programme delivery to other parties. It is not known whether other past cohorts have been in a similar situation and there are insufficient records available to establish this.

The Certificate and Diploma students typically learn together within their Wero. It was unclear how much differentiation there is between the two groups of students: both levels have a focus on learning performance items and both carry out what is described as 'research'. The Diploma students probably have more of a leadership role within the Wero, and take an active part in teaching items to their peers or to the students in secondary schools with whom they are working.

MACT asserts that the mix of students allows for the formation of tuakana-teina relationships in alignment with kaupapa Māori pedagogy. NZQA acknowledges this benefit, but notes that each cohort must have learning experiences consistent with the content of the programme in which they are enrolled. It was not clear from discussions with staff that this is in fact the case, particularly for the Diploma students.

Some tutors appear not to have a clear picture of the requirements of the programme and how to translate that into robust delivery. Tutors' approaches to planning for the year varied widely. Additional content and experiences such as fitness training, contemporary dance, public speaking, karanga, composition, instruments, guest speakers and field trips, while enriching for students, are not necessarily aligned with the programme.

MACT has formed relationships with secondary schools which provide MACT's students with opportunities to teach school students. Diploma students also teach items to their peers, and to Certificate students. There is a lack of clarity regarding the integration of these teaching experiences into the programme as a whole, and inadequate records of teaching that has taken place either collectively by the Diploma cohorts or at individual student level.

Management of the off-site cohorts largely takes place remotely. This year, the new MACT Programme Director has been liaising with the Wero facilitators to ensure they send in their reports, but for the most part the Wero facilitators operate independently. Sometimes they are visited by other more experienced facilitators.

### **Programme duration**

Both the Certificate and Diploma programmes were approved at 40 teaching weeks.

The 2013 student handbook, submitted at the time of application for programme approval and accreditation, stated that the course would run from 28 January to 13 December, with six weeks of recess – a total of 40 teaching weeks. This is consistent with the timetable

presented to NZQA for 2013.

The timetabled delivery for 2014 runs from the start of March to the end of October: 29 weeks in total.

Tutor reports indicate even shorter duration. According to these reports, two of the 2014 Wero have only been meeting together since the middle of April. Another tutor wrote of “completing the enrolment process” in July, and having their first classes with a particular group in July.

In some cases, students appear to have achieved both the Certificate and the Diploma within the same calendar year.

In its submission in response to NZQA’s draft findings, MACT stated that 2014 Diploma students would have completed the requirements of their programme by 19 December 2014 and proposed to extend delivery of the Certificate programme to 30 January 2015, to allow students to complete the programme.

### **Programme delivery hours**

The on-campus Wero has scheduled class times on 3–4 days during the week. The potential hours of delivery for these students is therefore more closely aligned with what was approved by NZQA (20 teaching hours per week).

The off-site Wero have very low hours of delivery. Some meet once a week, others have periodic wānanga with optional classes in between.

Deloitte has estimated that the average total teaching hours during 2013/14 was 323 for Certificate cohorts and 345 for Diploma cohorts. This corresponds to 40% and 43% of the 800 teaching hours set out in the respective programme documents.

### **Student attendance**

Tutors were instructed in 2014 to begin keeping records of attendance. In some instances, several months’ of attendance records appear from visual inspection to have been created and signed by students only just prior to NZQA’s visit, raising questions about their accuracy and authenticity.

In one Wero, the signed attendance dates are inconsistent with a statement in the tutor’s report about when the group began to meet. In another case, students have signed to confirm they attended on dates which were during the scheduled recess, and attendance is complete to a degree that leads to doubt about its authenticity.

In other Wero, where the attendance records appear to be more authentic, the records show that students’ attendance is sporadic. Tutor reports reflect the challenges of students working around sick children, winter sports, school holidays and tangihanga. Some students have been absent for the majority of classes. Two of the students who were interviewed stated that they chose not to attend any classes. In one current Wero, most students had temporarily ceased attending towards the end of 2014 due to being overseas, or for work or family reasons.

MACT does not set appropriate or clear expectations for students regarding their attendance and participation in the programme, and does not have adequate policies and procedures for following up on absenteeism.

## **Assessment – Level 4 Certificate**

### ***(i) Assessment up to and including the 2013 calendar year***

Performance is the primary reason that most of the Wero have come together. Limited video evidence was available at the site visit, but it did illustrate the students performing several items. Tutor reports outline various performance events that students have been involved with and during which they have been assessed for the performance aspects of the qualification.

MACT tutors explained that assessment of the knowledge component of the Level 4 qualification may be carried out either orally or by the students completing a written template (rangahau) about each of the items. Some groups consist of professionals in the workforce who are comfortable with written work, and they are more likely to use written assessment methods. Other groups comprise students who have not done well at school, and who find oral assessment more achievable.

Videos of sample assessments showed a group performing an item, preceded by an introduction of the item by one of the students in the group. These introductions are considered by MACT to provide evidence of the whole group of students having achieved the knowledge component of the relevant unit standard. However, because each item is only introduced by one of the students (chosen at random), each student has the opportunity to demonstrate knowledge of a very limited proportion of the total number of items.

Performance attestations are not consistently supported by recorded (digital) evidence.

The academic staff emphasised that two of the off-site Wero facilitators simply “collected evidence”, which MACT would then mark.

Close examination of the assessment material pertaining to the Level 4 qualification raises concerns about MACT’s assessment capability. The assessment guides sighted were piecemeal, poorly laid out and contained errors in unit standard names, numbers, descriptions, and/or credit value. Within the material, some judgement statements were not appropriate for the required evidence. Some evidence statements did not match the requirements of the unit standards.

Similar concerns exist about the marking and assessor judgements in samples viewed. For example, outcomes assessed as ‘complete’ were not documented as such on the student’s assessment schedule. Outcomes assessed as ‘not yet complete’ were documented as ‘complete’ on the student’s assessment schedule. In one case, the tutor had requested resubmission based on incorrect evidence requirements. Plagiarism from internet sources had not been identified.

### ***(ii) Assessment in the 2014 calendar year***

In February 2015, MACT provided NZQA with assessment material for students who had been enrolled during 2014. This included written assessments, observation checklists, and video evidence across a wide range of unit standards. The standard of the record keeping and degree of evidence collected was a significant improvement on what had been sighted for previous years.

## **Assessment – Level 6 Diploma**

### ***(i) Assessment up to and including the 2013 calendar year***

Assessment samples for the Level 6 research unit standard (19909) gave little confidence that MACT's assessment against the learning outcomes of this unit standard has been appropriate, valid or authentic. The samples sighted at NZQA's monitoring visit:

- did not contain a written research proposal
- did not include adequate referencing
- demonstrated extensive plagiarism, with identical tasks having been submitted by several students.

The Executive Director stated that students worked collectively to produce the rangahau 'research' sheets, but that their individuality was demonstrated in their teaching. NZQA considers that the evidence collected does not adequately demonstrate that students have achieved the learning outcomes of this unit standard.

There seemed to be little difference between the expectations of the 'research' templates completed by Certificate and Diploma students. The template contains very similar information. In some cases, Diploma students seem to have simply collated the 'research' rangahau that they had produced for the Certificate unit standards, and submitted these to fulfil the requirements of unit standard 19909.

There was no record of any Diploma student having been observed teaching, although anecdotally it seems that this did happen on an informal basis. Records were not kept of which specific performance items each Diploma student taught, to whom, or when, let alone any feedback given to the student about their teaching practice.

Poor record keeping is a systemic issue. Student files recorded that some students had to be notified that they had been awarded two unit standards in error (collectively worth 50 credits – 40 per cent of the programme content), after they had been awarded the qualification. A letter asked them to come in and make arrangements to be re-assessed, but there was no follow up activity recorded on their files.

The complete absence of physical evidence makes it hard for NZQA to have confidence that any Diploma student has genuinely completed the programme requirements and been assessed as competent against the required learning outcomes.

### ***(ii) Assessment in the 2014 calendar year***

After receiving NZQA's draft findings, MACT undertook to provide a full copy of assessment material for all of the 2014 Diploma students. This was subsequently submitted.

The material provided is much more complete than any previously sighted. All aspects of the programme are covered in some form, including research proposals, research rangahau, lesson plans, evidence of teaching, and assessment of teaching practice.

While the various components are present, it is clear that they have not necessarily been completed in the most appropriate sequence or timing. The research proposals have been written retrospectively, rather than prior to beginning the research as would be expected. Likewise, written endorsement of the research was provided only in December 2014.

Similarly, students' descriptions and lesson plans indicate that much of their teaching practice took place in 2013 (prior to their official enrolment in the Diploma programme), but the written assessment of their teaching practice was not completed until late 2014.

Descriptions of research methodology and the rangahau themselves display greater individuality than was apparent in previous years' samples, and there is less evidence of plagiarism. Each student has made personal reflections on the experience of teaching the various performance items over a period of weeks.

However, the teaching plans presented are templates reproduced across all students for submission, and it is unclear to what extent students contributed to these.

The core aspects of the programme are represented, and are more thoroughly documented than in previous years, albeit 'after the fact' in some instances. The material indicates that MACT has the capability and capacity to deliver, assess, and document appropriately if stronger systems and greater accountability were to be established.

### **Organisational self-assessment**

Given MACT's failure to independently identify and/or rectify the many issues that have been highlighted during this review, NZQA has concerns about MACT's governance, management, capability in self-assessment, and academic management.

### **Next steps**

NZQA will give consideration to what action may be required in relation to MACT's registration, programme accreditation, or consent to assess against standards as a result of this investigation.

## Appendix 1 – MACT non-compliance with NZQA rules

Issue	Rule to which the issue relates	Rule reference
Use of unapproved sites for programme delivery	Private Training Establishment Registration Rules 2013	5.1.1(d)
Failure to provide NZQA with Annual Return documentation for the year ended 31 Mar 2014		5.1.3(a)
Delivery of the programme through un-approved sub-contracting arrangements		5.1.3(b)
Failure to engage sufficient competent staff to meet its responsibilities to students		5.1.6(a)
Failure to ensure that teaching staff have the necessary skills to fulfil their role (e.g. planning and documentation)		5.1.6(c)
Lack of oversight of management and administration staff		5.1.6(d)
Failure to have and implement appropriate systems for the collection, recording, and transfer of information to government agencies		5.1.7
Failure to have and implement appropriate enrolment procedures		5.1.7
Unsatisfactory processes for identifying and dealing with low student attendance		5.1.7
Inadequate systems for assessment and moderation		5.1.8(a)
Failure to maintain accurate enrolment records	PTE Enrolment and Academic Records Rules 2012	4.1
Failure to maintain accurate academic records, including assessment, attendance and qualification records		6.1
Failure to ensure that the programme as a whole is coherent	Programme Approval and Accreditation Rules 2013	4.1 Criterion 2
Inadequate and inconsistent delivery methods		4.1 Criterion 3
Inadequate review of programme performance		4.1 Criterion 4
Failure to follow own processes for admission of students (including entry processes and completion of pre-requisite qualifications)		4.1 Criterion 5
Inadequate programme length and structure		4.1 Criterion 5
Lack of clarity regarding integration of practical components		4.1 Criterion 5
Inadequate capability to ensure assessment materials and decisions are fair, valid, consistent and appropriate		6.1 Criterion 1
Failure to provide programmes as they were approved, including adhering to the programme regulations.		12.1(d)
Failure to accurately report credits within 3 months of assessment, and in many cases, failure to report credits at all.		Consent to Assess Against Standards on the Directory of Assessment Standards Rules 2011