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External Evaluation and Review Report

Freedom Institute of Higher Education
Limited trading as Freedom Institute
of Higher Education

Date of report: 4 November 2020

About Freedom Institute of Higher Education

Freedom Institute of Higher Education is a small private training establishment offering programmes mainly at levels 7-9, with a focus on applied learning. It is accredited to deliver programmes designed by a related company called the House of Montrose, trading as New Zealand Curriculum Design Institute, a company that specialises in programme design. Freedom Institute receives some funding from the Ministry of Social Development.

Type of organisation:	Private training establishment (PTE)
Location:	Registry: 1-28 Liverpool Street, Central Hamilton. Other teaching sites include Auckland and, until recently, Tauranga. This evaluation took place at 610 Victoria Street, Hamilton.
Code of Practice signatory:	Yes
Number of students:	At the time of scoping the evaluation: domestic eight, international 23.
Number of staff:	Five full-time and five part-time equivalents
TEO profile:	Freedom Institute of Higher Education
Last EER outcome:	At the previous external evaluation and review (EER) of Freedom Institute (2016), NZQA was Confident in the PTE's educational performance and in its capability in self-assessment.
Scope of evaluation:	Two focus areas were selected: <ol style="list-style-type: none">1. Suite of programmes: Postgraduate Certificate in Applied Leadership; Postgraduate Diploma in Applied Leadership; Master of Applied Leadership. At the time of scoping, 10 students were enrolled.2. NZCDI Graduate Diploma in Curriculum Design and Academic Management (Level 7). This programme had not previously been subject to any external review by NZQA. At the time of scoping, four students were

enrolled.

Other quality assurance: At the time of this evaluation, NZQA became aware that three international students were enrolled in the Certificate in New Zealand Studies (Level 2). This programme's accreditation lapsed in 2018. Advertising to, and enrolling fee-paying international students in an unaccredited programme is a breach of the Education Act. NZQA issued a Compliance Notice in relation to this on 9 March 2020 and confirmed that the matter was resolved on 22 May 2020.

In March 2020, NZQA released a draft moderation summary report for the New Zealand Diplomas in Business (NZDipBus) Levels 5 and 6. All level 5 courses moderated were identified as having significant issues with assessor decisions. All level 6 courses moderated were identified as having significant issues with assessor decisions and assessment materials. NZQA moderators considered that none of the 10 samples of learner work provided by Freedom Institute were at the required level. NZQA has since advised Freedom Institute that it is giving consideration to addressing these concerns.

MoE number: 7196
NZQA reference: C37709
Dates of EER visit: 21 and 22 January 2020

Summary of Results

Freedom Institute's mission, vision and values are well defined, coherent and acknowledged positively by the students, as well as local iwi and Pasifika stakeholders. Students in the focus area programmes achieve well, and there are numerous sound academic practices. There are limitations in gathering comprehensive evidence around programme relevance and value. There have also been concerning lapses in academic quality and compliance, and these lapses undermine NZQA's confidence in the PTE. This evaluation finds highly variable performance.

Not Yet Confident in educational performance

Retention of students and their qualification pass rates in programme focus areas are sound. Students' educational needs are being met.

Most students interviewed said they were satisfied with the teaching and felt supported by staff. Students also reported that they were happy with the uniquely small class sizes.

Not Yet Confident in capability in self-assessment

There is a well-defined theoretical model underpinning student support, and this is reasonably well embedded. The PTE provides extra support for students facing learning challenges.

Academic quality and related internal self-assessment processes are in use, but external monitoring by NZQA raises questions about some aspects of their effectiveness. Simpler or clearer aggregation and summation of outputs and outcomes would be beneficial for all interested parties.

Features of self-assessment include a comprehensively reviewed quality management system, which staff use; frequent student surveys; and planning, monitoring and review cycles which cover all areas of operation and are suitably documented and lead to improvements. Self-assessment in relation to managing compliance is poor.

There is clear information on graduate destinations. Less evident is comprehensive information on the value of outcomes, the transfer of skills into work, and why the unique programme offer matches external stakeholder needs. Although both focus areas were rated as Good,

NZQA has concerns around some now well-documented lapses in performance and compliance, which Freedom Institute is in the process of correcting.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Most students who enrol at Freedom Institute are retained and complete their programme (see Appendix 1 for achievement data). Student interview, selection and acceptance processes are generally working effectively², and most students achieve the learning objectives of their particular programme. The PTE's claimed '93% graduation rate' is questionable based on NZQA external moderation findings in 2020.³</p> <p>Students enjoy small cohort teaching and mentoring. In the focus area programmes, students can select topics and/or research that build on their previous academic or professional background. Attention to the authenticity of student work, and systematic internal moderation systems, was apparent.</p> <p>Achievement data is analysed by programme and by learner group, and so a year-on-year picture of achievement is being established.⁴ The data used is reasonably reliable, and management understands and can confidently explain it. Key features of analysis include grade achievement and learner attendance analysis, and credits achieved at the point of learner withdrawal. Lack of a 'course completion' indicator is notable, but not a particular gap or concern at present.</p>
Conclusion:	Pass rates are strong and self-assessment of achievement is comprehensive. Currently, with the low volume of enrolments, the PTE demonstrates the capability to gather, monitor and analyse reliable data, and accurately report achievement. The PTE could better evidence the links between these activities to

¹ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

² See 1.6 for examples of where this is not as clearly the case.

³ This relates specifically to assessment practice findings identified in NZQA's NZDipBus monitoring and moderation reports in 2019 and 2020.

⁴ Priority group learners are not a statistically significant proportion of the data set currently. The PTE is trying to engage more Pasifika and Māori learners.

	improvements and trends over time.
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1.2 What is the value of the outcomes for key stakeholders, including students?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Freedom Institute is able to clearly evidence the match between students' study intentions and programme achievement. This includes well-documented details around the project or research components. The PTE also has good information on graduate outcomes, presenting data across all programmes with job roles, paid hours and qualitative comment. This information is relevant and analysed. In most cases, the types of graduate roles are broadly congruent with the qualification studied, although they are often generic service sector roles not related specifically to the qualification outcomes. This is not unexpected given the residency goals of most international students.</p> <p>Freedom Institute provided no comprehensive evidence that programme content is confirmed or modified as a result of graduate or stakeholder follow-up. There is a stronger focus on the individual's experience, attributes and end goals. There is limited evidence of the value of the applied nature of the programmes; or how industry (other than advisory groups) is engaged with the PTE apart from hosting students; and what valued outcomes occur. The PTE's self-assessment describes some limitations of their data, and strategies to strengthen it.</p> <p>Freedom's self-assessment states that: 'in 2018 the major research outputs occurred at [the PTE's own annual] Research Symposia but attended also by external researcher and researcher guests'. While there has been a trend towards more peer reviewed, external (including international) publication, the PTE is still building capacity in this area. The value and impacts of the research are as yet modest. The PTE has recently increased its research capacity with the recruitment of a head of programme for the applied suite. There is a need to improve the relevance and volume of research outputs here.</p>
Conclusion:	Students benefit from their programmes, and the PTE tracks graduate outcomes. However, given the qualification levels, and claims of the unique value of the suite of postgraduate programme offerings, Freedom needs to more convincingly evidence the value of student outcomes. Stakeholder-sourced

	evidence is very limited.
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1.3 How well do programme design and delivery, including learning and assessment activities, match the needs of students and other relevant stakeholders?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Freedom Institute’s programme offer is distinctive, mostly higher level, and developed from a well-considered theoretical base. There has been some teacher turnover at Freedom Institute. Management has made positive efforts to ensure all faculty are capable and professional. According to some students, this turnover has been detrimental to their learning at times. Nevertheless, most students said they were satisfied with the teaching and felt supported by staff.</p> <p>Programme oversight and moderation processes appear well planned, ongoing and appropriate to scale, but NZQA external moderation has identified serious weaknesses in the business diplomas. There have been a high number of learner re-sits, which are analysed in detail.⁵ Some teaching staff have broad expertise and high-level academic, research and professional experience. This is certainly sufficient to sustain ongoing academic debate and support for students’ applied projects. Previous self-assessment led to an academic tutorial system, which now appears to be having positive effects.</p> <p>The breadth of the portfolio, and the small number of students currently choosing the PTE, present challenges of ‘scale’, such as very small class sizes. The students interviewed voiced no particular concern about this, and the PTE points to positive student survey feedback. However, there is little self-assessment to confirm that programme design and delivery – including learning and assessment activities – are effective. The scale challenges have led to concerns by NZQA that, in a few cases, teachers teach outside their area of expertise, or at a level higher than is deemed appropriate.</p>
Conclusion:	Academic standards are generally well maintained. However, it is difficult to identify who the industry stakeholders are and the

⁵ Re-sit rates have been 61 per cent, 44 per cent, 92 per cent and 52 per cent year on year. According to Freedom Institute data, this means that 49 per cent of learners in the past four years have been detected as having inauthentic work.

	impact they are having on the programmes. It is also not clear what pathways are being established to build and maintain value, apart from evidence obtained from graduate and employer satisfaction data.
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1.4 How effectively are students supported and involved in their learning?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Freedom Institute can effectively describe its well-defined and researched kaupapa around student support.⁶ This is increasingly well embedded. Regular meetings are held with each student to determine their progress and to address any issues or concerns. Students are well supported. An experienced practitioner who is also a board member has led staff professional development. Overall, students spoke positively about the support available; some ‘turbulence’, and ‘sudden changes’ in staffing were also mentioned.</p> <p>The website, prospectus, course handbooks and paper outlines are all in place and support the students, although some documentation is too wordy and complex. The PTE runs generic modules around academic integrity and finding employment, and there are also frequent special seminars, presentations and social activities. Staff attend to the campus climate and student wellbeing, and involve students in decisions. The attendance policy and its monitoring, records of absences, and applications by students for pastoral support (such as counselling or family time) are appropriately documented.</p> <p>Freedom Institute has notable positive and ongoing links with local iwi, and this is flowing into professional development activities and staff/student awareness around te reo me ōna tikanga. There is also positive engagement with local Pasifika leaders. These interactions are well embedded, so they should further benefit staff and students.</p> <p>Freedom Institute has comfortable and spacious premises, close to the central city. Freedom states that all faculty can provide holistic support to their learners based on their support model. However, it is unclear what the student experience at the other</p>

⁶ Freedom Institute’s student support is developed around a Te Whare Tapa Rima model, which has been subject to AKO Aotearoa-funded research and analysis, with other TEOs.

	teaching site is, and to what extent lecturers at the Auckland site may need to assume a more significant pastoral role due to the small number of people there.
Conclusion:	Student support and involvement is positive, with designated roles, appropriate training and ongoing professional development. Freedom Institute is deploying staff to meet student needs, and delivering against NZQA programme approvals and Code of Practice ⁷ expectations.

1.5 How effective are governance and management in supporting educational achievement?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Governance and management are clearly focused on supporting student achievement and are driven by the institute's mission, vision and values, as well as supporting the Tertiary Education Strategy. These goals are well defined and frequently discussed. That said, there are specific areas where governance and management need to improve compliance with NZQA rules and legislative requirements.</p> <p>Academic leadership is positively reflected in intentional and ongoing consultation with advisory groups and ongoing strategic planning, which is detailed, and actions occur as feasible. As indicated, evidence of programme value gathered from industry stakeholders outside these groups is very limited.</p> <p>Freedom Institute has implemented a code which aligns to the PTE's values, and is being comprehensively implemented in all programmes. At the operational level, the desk files system, teacher journaling and ongoing professional development of staff are notable. Academic quality and related self-assessment processes include a quality management system; frequent student surveys; and planning, monitoring and review cycles which are suitably documented and lead to improvements.</p> <p>The PTE appears somewhat pressured due to the programme level and academic demands, and also by the modest size of the faculty and the complexity and possible duplication of some academic systems. There is a need for consolidation, embedding and continuity of staffing to operate these systems in</p>

⁷ The Education (Pastoral Care of International Students) Code of Practice

	<p>some areas. Lack of growth at the other teaching sites has been a challenge – and has led to apparent inefficiencies such as teaching 1:1, and at least one student having to travel a long distance to class, contrary to their initial plans. When questioned by the evaluators about the sustainability of the organisation, the PTE was adamant that their operational model was both correct and viable.</p>
Conclusion:	<p>Overall governance and management, programme leadership, planning and resourcing of the most critical operational and academic processes are reasonably effective, with some clear limitations as highlighted in this report. The PTE is systematic in working through both its own identified changes and those arising through external channels. However, governance and management has some challenges to resolve, and in particular maintaining compliance with NZQA requirements.</p>

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>Freedom Institute’s management of compliance has been quite unconvincing since the previous EER. It is unclear whether the root cause is lack of organisational capability in relation to managing compliance, or simple inattention to detail.</p> <p>NZQA monitoring of the delivery of the New Zealand Diploma in Business levels 5 and 6 has also identified quality issues.</p> <p>An Immigration New Zealand audit in 2018 identified one international student who attended class without the necessary visa⁸; a student complaint was also upheld by NZQA.</p> <p>At the time of this evaluation, NZQA became aware that three international students were enrolled in the Certificate in New Zealand Studies (Level 2). This programme’s accreditation lapsed in 2018. Enrolling these fee-paying international students in a programme for which Freedom Institute no longer held accreditation is a breach of the Education Act and the</p>

⁸ Freedom states that they did not commence any fee drawdown or provide a Confirmation of Enrolment Letter until after the prospective learner obtained Student Visa approval.

	<p>Education (Pastoral Care of International Students) Code of Practice 2016.⁹</p> <p>The PTE reviews its code requirements, staff allocation and capability, communications with students, agent management, and monitoring of NZQA and other government agency requirements. All required material is in place; three follow-up queries were convincingly addressed in good time. The PTE has taken part in a consistency review and degree monitoring, and has notified programme changes and submitted other documentation to NZQA as and when required.</p> <p>Freedom Institute’s delivery of the New Zealand Diploma in Business (Level 5) and New Zealand Diploma in Business (Level 6) does not meet the approval and accreditation Rule 4.1 Criterion 3 in relation to delivery methods; Rules 4.1 Criterion 6 and 6.1 Criterion 1 in respect of assessment and moderation; and Rule 6.1 Criterion 2 in relation to resources.</p>
<p>Conclusion:</p>	<p>Management’s attention to academic and operational systems needs to extend to managing a compliance regime aimed at meeting NZQA expectations.</p>

⁹ NZQA issued a Compliance Notice in relation to this on 9 March 2020.

Focus Areas

This section reports significant findings in each focus area, not already covered in Part 1.

2.1 Focus area: Applied Leadership Suite of Programmes

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>There have now been graduates at all three programme levels, with no student attrition. Delivery has been variable at times – with staffing changes reportedly impacting students’ learning. Some of this was outside the reasonable control of management.</p> <p>The PTE’s high expectations for this suite of programmes are not yet supported by comprehensive evidence of their value and impacts. Freedom Institute is working on this, for example by formalising its alumni group to further build a longitudinal database regarding the value and impacts of the programme. As noted, the PTE has published some research and is gaining momentum. The recent appointment of a dedicated programme leader is a positive move. That said, aspects of programme review and research at Freedom Institute need to be more comprehensive and embedded in order to match NZQA expectations.</p> <p>Students have enrolled from a range of source nations, and are well prepared academically. They are capable and motivated to undertake programmes with significant self-direction. This evaluation concurs with the NZQA degree monitor findings¹⁰ that the applied suite appears to be delivered according to NZQA approvals. The PTE’s responses to the degree monitoring recommendations are credible.</p>

¹⁰ December 2018

Conclusion:	Content, facilitation and academic quality of the programmes are generally good. Evidence of the value of the content and the overall programme is less sure, which has affected the ratings for key evaluation questions 1 and 2. Evidence of value for external stakeholders, and enduring relationships with industry, needs to be further established in relation to the programme levels and reasonable expectations of students entering them. These limitations link to the effectiveness of both research and programme review more broadly at the PTE.
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2.2 Focus area: NZCDI Graduate Diploma in Curriculum Design and Academic Management (Level 7)

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	At the time of the evaluation, this was a relatively new programme, delivered twice, with few graduates and one current student. Educational performance is generally positive. The earlier cautionary comment on cohort size and learning dynamics (1.3) particularly applies here. Evidence of value for external stakeholders, and enduring relationships with industry, needs to become better established; these limitations link to the effectiveness of both research and programme review more broadly at the PTE.
Conclusion:	Not applicable.

Recommendations

Recommendations are not compulsory but their implementation may improve the quality and effectiveness of the training and education provided by the tertiary education organisation (TEO). They may be referred to in subsequent external evaluation and reviews (EERs) to gauge the effectiveness of the TEO's quality improvements over time.

NZQA recommends that Freedom Institute of Higher Education Limited trading as Freedom Institute of Higher Education:

1. Implement a more focused strategy and process to identify and provide evidence for who the main industry stakeholders are (i.e. entities not part of the PTE's numerous boards) who can also provide feedback on valued outcomes.
2. Establish and provide evidence for what enduring pathways are being established to build and maintain programme value and relevance.
3. Review the complexity of systems and reporting mechanisms to better reflect the size and needs of the PTE.
4. Develop a clear and simply referenced compliance regime aimed at meeting NZQA expectations.
5. Continue to strengthen research and programme review more broadly at the PTE.
6. Familiarise itself with the legislation and NZQA Rules that apply to programmes that are not, or no longer, recognised by NZQA, to ensure students are adequately informed about the courses on offer.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. These include NZQA Rules and relevant regulations promulgated by other agencies.

There are no requirements arising from the external evaluation and review.

Appendix 1

Table 1. Summary achievement data

All students*	Qualification completions	Course completions	Retention (progress to a higher programme level)	Students withdrawn or removed from programme
2016 ¹¹	13	Not supplied	1	2
2017	9	Not supplied	3	1
2018	14	Not supplied	6	0
2019	19	Not supplied	1	1

*Māori and Pasifika – 1 achieved a qualification with Merit; 2 withdrew due to ill health

Table 2. Focus area programmes – qualification completions

	2018 (withdrawn)	2019 (withdrawn)
NZCDI Graduate Diploma in Curriculum Design and Academic Management (Level 7)	1 (not supplied)	4 in progress (not supplied)
Postgraduate Certificate in Applied Leadership	1 (not supplied)	1 (not supplied)
Postgraduate Diploma in Applied Leadership	2 (not supplied)	4 (not supplied)
Master of Applied Leadership	none eligible	1 (4 in progress)

Source: Freedom Institute self-assessment

¹¹ Includes 10 students enrolled from a Category 4 PTE (student assistance situation).

Appendix 2

Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

For the same reason, these findings are always limited in scope. They are derived from selections and samples evaluated at a point in time. The supporting methodology is not designed to:

- *Identify organisational fraud¹²*
- *Provide comprehensive coverage of all programmes within a TEO, or of all relevant evidence sources*
- *Predict the outcome of other reviews of the same TEO which, by posing different questions or examining different information, could reasonably arrive at different conclusions.*

¹² NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.

Self-assessment and participation and cooperation in external evaluation and review are requirements for:

- *maintaining accreditation to provide an approved programme for all TEOs other than universities, and*
- *maintaining consent to assess against standards on the Directory of Assessment Standards for all TEOs including ITOs but excluding universities, and*
- *maintaining training scheme approval for all TEOs other than universities.*

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.

In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes, training schemes and consents to assess and registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016. The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

External evaluation and review reports are one contributing piece of information in determining future funding decisions where the organisation is a funded TEO subject to an investment plan agreed with the Tertiary Education Commission.

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz). All rules cited above are available at <https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/>, while information about the conduct and methodology for external evaluation and review can be found at <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>.

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