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External Evaluation and Review Report

New Zealand College of Chinese Medicine Limited

Date of report: 15 November 2022

About New Zealand College of Chinese Medicine Limited

The New Zealand College of Chinese Medicine (NZCCM) offers programmes in acupuncture, traditional Chinese medicine, and massage. Programmes include campus-based practical block courses and clinic work-based practicums.

Type of organisation:	Private training establishment (PTE)
Location:	321 Great South Road, Greenlane, Auckland
Code of Practice signatory:	Yes
Number of students:	Domestic: 156 students in 2022 (73.5 equivalent full-time students); Māori: five and Pasifika: one International: 15 in 2022 (6.8 equivalent full-time students)
Number of staff:	12 full-time; 25 part-time
TEO profile:	See NZQA: New Zealand College of Chinese Medicine
	NZCCM is the qualification developer for the New Zealand Certificate in Chinese Medicine for Health Maintenance (Level 4) ref # NZ 2982; Bachelor of Health Science Majors in Chinese Medicine (Acupuncture and Herbal Medicine), Acupuncture (Level 7) ref # PC 7282; and Master of Chinese Medicine (Level 9) ref # 4103.
Last EER outcome:	At the previous EER, conducted on 16 August 2018, NZQA was Confident in New Zealand College of Chinese Medicine's educational performance and Confident in their capability in self-assessment.
Scope of evaluation:	<ol style="list-style-type: none">1. New Zealand Diploma in Wellness and Relaxation Massage (Level 5) [Ref 2741]2. Bachelor of Health Science in Chinese Medicine (Acupuncture and Herbal Medicine); (Acupuncture Level 7) (Level 7) (ID-112061) [Ref PC 7282]

3. International Student Support and Wellbeing

MoE number: 7282
NZQA reference: C50789
Dates of EER visit: 17-19 August 2022

Summary of results

NZCCM has overall sound achievement and provides valuable outcomes to students, the industry and community, supported by highly qualified and experienced practitioners. Quality of self-assessment is strong but varies across programmes, with a greater emphasis on the degree programmes. Gaps in academic leadership has had some impact on key processes; these have been addressed. The effectiveness of these changes is yet to be observed.

Confident in educational performance

- Overall student achievement is generally sound. Students gain skills and knowledge and are well prepared for work with clients in a range of different settings.

Confident in capability in self-assessment

- NZCCM works closely with key industry partners and community stakeholders to be well informed of industry needs and changes. The PTE is effective in meeting the need for highly skilled and professional traditional Chinese medicine and massage practitioners.
- Programmes are aligned to industry standards and professional practices. Well-qualified and experienced teaching staff provide engaging educational experiences, with strong individualised academic support.
- Governance and management have not been effective in managing the distance learning environment, leading to student complaints to NZQA. NZCCM has reviewed its policies and processes, and the diploma level 5 programme review is underway to address the issues.
- The management of compliance requirements has been variable. Gaps in external moderation, student complaints and programme validation of offshore delivery has resulted in an organisational restructure and a review of the quality management system.
- NZCCM's self-assessment is generally sound, with gaps in sub-degree programmes, prompting organisation-wide reviews.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>NZCCM has strong and consistently high course completions in comparison with other PTEs with similar programmes (refer to Appendix 1). There have been variable overall qualification completions; however, the Bachelor's programme has seen an upward trend from 2018-21. Reasons for non-completions and withdrawals are known to NZCCM, with many students affected by the Covid lockdowns and the vaccination mandate², requiring extended learning periods to complete the practicum part of their programmes. Achievement is mostly validated by robust internal and external moderation processes; however, the NZCEL³ programme's variable external moderation results undermine validity in achievement for this programme only.</p> <p>NZCCM tracks the participation and achievement figures for Māori and Pasifika and disabled⁴ students; however, comparisons of these figures are disproportionate due to low participation numbers.</p> <p>Students' attendance is a key focus and is used as a measure of student engagement. Factors affecting student progress are analysed and discussed at programme and academic meetings. Appropriate support and individual learning plans are provided to students across all programmes.</p> <p>Individual student and course completion data is well</p>

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 A number of students were not able to continue with their study due to being unvaccinated for Covid-19. Students are required to be vaccinated to complete the practicum in the NZCCM clinic as per the government's Covid-19 health mandate.

³ New Zealand Certificate in English Language

⁴ Disabled are self-identified at enrolment; however, it is not clear what disabilities were identified apart from one student who is blind.

	understood and analysed through the annual degree programme reviews. Analysis of sub-degree programmes is less frequent, and review is prompted by compliance requirements.
Conclusion:	Student achievement is generally strong across all programmes. Students gain important knowledge and skills. Data analysis is comprehensive, however, a more consistent approach to self-assessment across all programmes would strengthen qualification achievement outcomes.

1.2 What is the value of the outcomes for key stakeholders, including students?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>A high proportion of graduates gain ACC registration through the New Zealand Acupuncture Standards Authority. Graduates gain employment and can branch out into many different career paths within the health sector and wellness industries.</p> <p>The theoretical training, supported by practical, real-world components offered within the NZCCM clinic, provides students with transferable skills such as communication, critical thinking, enhanced cultural competency and professional practice, and prepares them well to deal with patients and clients.</p> <p>Communities and iwi bodies benefit from student and graduate expertise; for example, healing events held at marae provide free acupuncture services by supervised students. NZCCM is working with Te Kahu Aroha ō Rongo Trust⁵ to develop a programme to address alcohol and drug addiction in the community.</p> <p>Management has strong connections with industry bodies such as the New Zealand Acupuncture Standards Authority, Massage New Zealand and other industry practitioners in New Zealand and Australia. In 2021, the establishment of a China-New Zealand Chinese Medicine Centre received approval from the Chinese governing body and will be used to enhance education, research and the practice of Traditional Chinese Medicine (TCM) in New Zealand.</p> <p>Industry stakeholders interviewed for this evaluation confirmed</p>

⁵ This engagement informs NZCCM of community needs.

	<p>that NZCCM is known for producing graduates who are well prepared for employment, show confidence and professionalism.</p> <p>NZCCM obtains feedback from stakeholders (anecdotal), as well as students and graduates to understand the value of its programmes. There is an opportunity to increase the frequency of feedback gained from diploma graduates and employers, and to formalise stakeholder feedback to strengthen the understanding of valued outcomes for all programmes.</p>
Conclusion:	<p>Important and valued outcomes, such as graduate registration, employment and the provision of a skilled workforce to support the health sector are clearly evident. Although collection and analysis of stakeholder feedback is variable, some information gained is used to understand outcomes and inform decision-making.</p>

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:	Good
Findings and supporting evidence:	<p>The design and delivery of NZCCM programmes is monitored and reviewed by the senior management team, the academic board, programme committee and the advisory committee. Annual programme reviews are conducted for the degree programmes; however, the review of sub-degree programmes is not as frequent. NZCCM conducted the last review of the level 5 diploma in 2019, and the NZCEL level 4 in 2020 as part of a Type 2 version change. The level 6 diploma review in 2022 was prompted by a formal student complaint. Programme reviews are comprehensive and provide management with an understanding of the currency and relevance of the programmes to stakeholders.</p> <p>Teaching and learning resources and environments are planned and tailored to the benefit of the students. Textbooks, research databases, video materials and medical manikins are available to students. Large, interactive classrooms and clinical spaces with appropriate industry standard equipment meet both patient and student needs.</p> <p>NZCCM undertakes much effort to timetable and offer programmes by different delivery modes to respond to students'</p>

	<p>preferences, especially during the lockdown periods, with some international students not able to return to the country. The degree programmes are delivered in person, with practical training occurring weekly in the college clinic. The level 5 diploma programme is delivered mostly online, with students attending block courses for practical training conducted at NZCCM.</p> <p>However, in 2021 NZQA's programme validation report for offshore delivery and subsequent student complaints from distance learning students indicated that the delivery of online learning was not being managed effectively. NZCCM has responded with a comprehensive review of its processes. The challenges with the learning management system are understood, with work being done to further develop the programme content online.</p> <p>All programmes have an internal and external moderation plan which is approved by the academic board. At degree level, teaching staff are involved in the internal moderation process. This is less evident at the diploma level, where internal moderation of assessment is conducted by management.</p> <p>National external moderation results (NEMR) for the NZCEL level 4 have been inconsistent over the last four years, and moderation identified gaps in assessment practice. NZCCM has responded appropriately and has developed and completed a safety framework plan for the NZCEL level 4 programme.</p>
Conclusion:	Programmes are well aligned with industry needs, and programme review is mostly effective. Existing processes have been recalibrated to support self-assessment.

1.4 How effectively are students supported and involved in their learning?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>An admission interview provides students with advice and information on programme requirements. Student support and pastoral care is managed by the corporate management team. The small number of international learners are supported by the recruitment and student services manager.</p> <p>Students have access to effective academic support, with teaching faculty providing an inclusive on-campus environment and extensive academic support beyond the classroom; specialist academic language support is also available. Clinic supervisors and patient feedback help students to refresh their knowledge and guide their learning. Lunchtime tutorials by senior mentors, discussion classes and other academic activities provide Bachelor's students with further learning opportunities.</p> <p>Student attendance is closely monitored through fortnightly reports to ensure early interventions; some courses have attendance requirements to pass. After a successful pilot of independent learning agreements, formal independent learning plans were implemented, for monitoring and reviewing student progress and to provide further support to students across all programmes.</p> <p>In response to the student complaints in 2021, NZCCM reviewed and recalibrated the existing quality management system policy on student representatives to strengthen their role in the student body. The newly implemented student voice policy was developed in response to the Code of Practice 2021, and further formalises the role of the student representative. The impact of this change is yet to be seen.</p> <p>Student evaluations are conducted twice a year, and feedback is collected through student representatives. Student complaints have not been well managed, with NZQA receiving several complaints in 2021 from level 6 diploma students. The diploma level 5 students raised similar concerns regarding dissatisfaction with resourcing and communication when interviewed by the evaluation team. NZCCM acknowledged that they are aware of the issues and understand the challenges with the learning management system. Further programme content is being</p>

	developed for online.
Conclusion:	There is generally effective student support and engagement, and students have a largely positive experience in the Bachelor's and Master's programmes. Timely feedback and appropriate responses to student concerns and needs would be beneficial.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>NZCCM has a clear and well understood purpose and direction, and strategies are in place to grow and expand programme delivery, considering industry needs. Regular engagement with the NZCCM council provides direction and support for the board of directors and management. Shared leadership and collective decision-making occur at the senior management level, supported by the advisory committee. Organisational leadership is strong, with responsibility shared by the different management structures, and accountabilities are clear.</p> <p>Systematic and purposeful collaboration with well-established stakeholders at local and national and international levels, continue to make progress. Comprehensive environmental scanning and planning for change has seen NZCCM adapt provision to meet needs such as the recently approved Master's programme.</p> <p>Covid-19 has impacted student enrolments and programme delivery. However, management's response was measured and effective to ensure students were able to complete their studies through extended, individualised learning plans.</p> <p>Teaching staff are highly qualified in their areas of specialisation, and some teaching staff have long service with the college. Staff are research-active, with a strong focus on areas related to their teaching. They maintain their currency of knowledge and annual professional registrations. Staff are well supported by management, with regular internal professional development, such as recent assessment and moderation workshops, staff review, and further study and research-related activities.</p> <p>Resources are appropriate, with well-equipped classrooms, library and clinics adequately resourced. The provision of online</p>

	<p>resources is variable across programmes. While improvements are being made to the system, and a level 5 diploma programme review is underway to update the learning content, the significant impact of these resourcing issues is reflected in the student complaints.</p> <p>Ongoing NZCEL external moderation and academic delivery issues required NZCCM to review and strengthen its policies and procedures. However, it is not yet evident that changes are embedded and effective.</p> <p>NZCCM has well-documented processes for regularly gathering and reviewing information. There is a good level of information-sharing and reflection at management level and a clear focus on improving outcomes. Prioritising the student voice, and agile responses to student feedback, will strengthen student outcomes.</p>
Conclusion:	A strategic governance and management team supports the highly qualified and experienced teaching teams to ensure educational goals are being met. Management has traversed external and programme factors impacting the PTE, and appropriate improvements have been prioritised.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>The NZCCM senior management team works collaboratively with internal groups to meet compliance requirements. NZCCM is managing its key compliance accountabilities, with the organisation submitting annual attestations to NZQA in a timely manner.</p> <p>The monitors' reports for the Bachelor's and Master's (approved in 2020) programmes indicate that these programmes are meeting educational and industry requirements.</p> <p>Self-review of the Code of Practice 2021 is a sound process, involving relevant staff and a Code Gap Analysis Plan implemented in 2022 to strengthen practices. Responsibilities for the Code of Practice 2021 are managed well. A sample of</p>

	<p>international student files cross-checked by the evaluation team met current NZQA rules and Code of Practice 2021⁶ expectations.</p> <p>The recent variable NEMR⁷ outcomes for the NZCEL level 4 led to the development of a safety framework plan to monitor programme assessment, and a moderation action plan was submitted to NZQA.</p> <p>In 2021 the programme validation report for off-shore delivery of the Bachelor's programme was not satisfactory, and NZCCM responded appropriately to better support its off-shore learners.</p> <p>Issues in the New Zealand Diploma in Remedial Massage (Level 6) resulted in student complaints sent to NZQA in mid-2021. While NZCCM conducted a programme review, developed a remediation plan and a revision of the quality management system to strengthen processes, some of these challenges extend to the level 5 diploma which are being addressed.</p>
Conclusion:	NZCCM is managing most of its key compliance activities; however, self-assessment activities should be strengthened with a more consistent approach across programmes to ensure all compliance obligations are met.

⁶ Section 16D of the Code mandates that a Code signatory has the responsibility to ensure its students are appropriately covered by insurance.

⁷ National External Moderation Results

Focus areas

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

2.1 Focus area: New Zealand Diploma in Wellness and Relaxation Massage (Level 5) [Ref 2741]

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Course completions have been consistently rising, except for 2020 where there was a significant drop in completions as a result of students requiring extensions during the pandemic lockdown. Understanding graduate outcomes could be strengthened with more regular data collection.</p> <p>Students' complaints during the EER raised issues as follows:</p> <ul style="list-style-type: none">• Online resources are outdated and not aligned to the course content; there is difficulty navigating the videos and the content of the learning management system for further resources.• Communication restricted to the learning management system for academic support is not effective and is limited due to teaching staff employment arrangements.• Time is wasted during block courses, with students waiting for tutors.• There was confusion due to changes to the learning schedule not being communicated.• NZCCM did not close the feedback loop to keep students updated on improvements being made. <p>A more systematic and ongoing evaluation of the sub-degree programmes would strengthen programme outcomes.</p>
Conclusion:	The identified gaps in resources and lack of response to student complaints in this programme have impacted ratings.

2.2 Focus area: Bachelor of Health Science in Chinese Medicine (Acupuncture and Herbal Medicine); (Acupuncture) (Level 7) (ID-112061) [Ref PC7282]

Performance:	Excellent
Self-assessment:	Good

2.3 Focus area: International Student Support and Well-being

Performance:	Excellent
Self-assessment:	Good

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 New Zealand College of Chinese Medicine Limited:

- Continue to develop the student voice with a more practical approach to student complaints, such as regular in-person discussion with students on how to better meet their needs.
- Collect, aggregate and analyse diploma graduate feedback more frequently; and formalise employer feedback to understand the extent and depth of both diploma programmes' graduate outcomes.
- Include the diploma programmes in the annual programme review to strengthen understanding of student outcomes.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. This 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. Bachelor of Health Science Majors in Chinese Medicine (Acupuncture and Herbal Medicine); Acupuncture (Level 7)

Course completions	2018	2019	2020	2021
NZCCM	96%	96%	94%	96%
All PTEs	89%	89%	89%	87%

Data supplied by NZCCM

Table 2. New Zealand Diploma in Wellness and Relaxation Massage (Level 5)

	Feb 2019	Jul 2019	Feb 2020	Sep 2020	Feb 2021
Total cohort	11	6	5	17	10
Qualification completions %	60%	66.70%	40%	26.67%	33.30%
Course completions %	69.20%	85.30%	73.90%	39%	82.90%

Data supplied by NZCCM

Table 3. Tertiary Education Commission overview

	2018	2019	2020	2021
Qualification completion BHSc level 7	67%	74%	74%	80%
NZCCM overall course completions (incl. all programmes)	90%	90%	89%	81%
NZCCM overall qualification completions (incl. all programmes)	60%	57%	62%	49%

Data extracted from the Tertiary Education Commission

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 fraud⁸*
- *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.*

⁸ 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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