



NEW ZEALAND **QUALIFICATIONS** AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

QUALIFY FOR THE FUTURE WORLD
KIA NOHO TAKATŪ KI TŌ ĀMUA AO!

External Evaluation and Review Report

Impac Services Limited

Date of report: 4 November 2019

About Impac Services Limited

Impac Services Limited provides training in the health and safety field to industry and corporate clients. While most of its deliveries are unit standard-based, Impac is also accredited to deliver courses under licence to the National Examination Board in Occupational Safety and Health (NEBOSH) and Institution of Occupational Safety and Health (IOSH), both UK-based global organisations.

Type of organisation:	Private training establishment (PTE)
Location:	Unit 4, Level 1, 1 Cross Street, Newton, Auckland
Code of Practice signatory:	No
Number of students:	Domestic: ranges between 7,000 and 8,000 part-time and short-course enrolments annually (enrolments from January–June 2019: 3,405) Ethnicity: ranges from 10 per cent Maori and 3 per cent Pasifika on the entry-level courses, to 8 per cent Māori and 1 per cent Pasifika on the supervisory courses. International: none
Number of staff:	16 full-time, two part-time
TEO profile:	See Impac Services Limited on the NZQA website
Last EER outcome:	Highly Confident in educational performance Confident in capability in self-assessment
Scope of evaluation:	<ul style="list-style-type: none">• Health and Safety Representative Stages 1-4• NEBOSH International General Certificate in Occupational Health and Safety, and NEBOSH International Diploma in Occupational Health and Safety
MoE number:	7324
NZQA reference:	C36066
Dates of EER visit:	12 and 13 September 2019

Summary of Results

Impac has strong achievement and provides training that is highly valuable, not only to the trainees and their respective workplaces, but to the community as a whole. Its fit-for-purpose courses address industry needs and prepare the trainees to be competent health and safety professionals. Self-assessment practice, particularly in course development and review, is comprehensive. Management of compliance responsibilities is generally good; however, the PTE failed to inform NZQA, and obtain its approval, of its recent change of shareholding.

Highly Confident in educational performance

Impac's suite of courses are highly relevant and valuable for its trainees and their workplaces. The PTE focuses on understanding the training needs of its client organisations and designs courses that fully address these needs. As a learning partner to two UK-based global organisations, Impac also provides opportunities for learners to acquire international health and safety qualifications.

Confident in capability in self-assessment

Achievement is high, with evidence of equity and parity, and is underpinned by a robust moderation system. Trainees are well-guided to achieve their learning goals. Support such as reader/writers and additional time for lectures and assessments is available to minimise any barriers to learning.

Impac has a strong governance team who are fully involved in the daily operations of the business. The management team are well-qualified, and trainers have adult teaching qualifications and are well-networked in the industry.

Compliance responsibilities are mostly managed well, with one exception. Impac failed to seek approval from NZQA before its recent change of ownership (sales of shares) took place. This is in breach of Section 5.1.1(b) of the NZQA Private Training Establishment Registration Rules 2018. The organisation must ensure that it is abreast of all its compliance responsibilities as a PTE and manages them well.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>Impac trainees confirmed that they are acquiring useful skills and knowledge through a heightened awareness of health and safety which extends beyond their workplaces. Completion is generally high across all courses, in particular for the Health and Safety Representative courses.² This is underpinned by a robust internal moderation process and positive external moderation results which give confidence in the achievement of the organisation. Māori and Pasifika participation is low relative to the total learner numbers, but achievement is strong and on a par with the rest of the cohort.</p> <p>NEBOSH achievement rates are good, benchmarked globally among other learning partners, and are validated by the recent NEBOSH Gold Status awarded to the organisation.³</p> <p>Impac's regular monitoring and analysis of data gives them a good understanding of where they are in terms of achievement, and provides an early opportunity to address any factors leading to non-achievement. An example of this is when an assessment timing was modified because it was challenging for the trainees, leading to non-completion.</p> <p>Impac is also able to explain any anomalies in the achievement data and is aware of the story behind the numbers. Some trainees, for instance, completed the training but opted not to put the unit standards on their records, which affects the achievement data.</p>
Conclusion:	Course completion is high, underpinned by a robust moderation process and good moderation results. Impac's

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 Appendix 1.

³ Gold Status means that the organisation exceeded against the NEBOSH learning excellence principles.

	regular monitoring and analysis of data gives them a good understanding of achievement.
--	---

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>Impac’s courses are highly valued for their relevance to the trainees’ roles as health and safety representatives or professionals. Aside from the skills and competencies gained by trainees, the benefits extend to their workplaces and communities where their health and safety knowledge is transferred and skills are applied. Several graduates contacted by the evaluation team commented that they had gained promotion as a result of completing the courses at Impac.</p> <p>Learners of the NEBOSH certificate and/or diploma have the prestige of acquiring an international qualification from a global organisation, leading to work promotions as health and safety professionals for some learners.</p> <p>The repeat business that Impac gets from its many clients, both government agencies and private companies, confirms the value of the courses.</p> <p>Impac’s self-assessment practices ensure that it understands how the trainees and client organisations value the outcomes of the courses. Good relationships and clear channels of communication are maintained with clients, primarily through the client relationship managers, which provides the PTE with easy access to feedback.</p>
Conclusion:	<p>Impac’s courses are highly valuable and relevant to the trainees, their organisations and industry. As the main focus is health and safety, the skills and competencies acquired by the trainees benefit them, their workplaces and the wider community. Impac has systems in place to ensure that trainees’ and clients’ feedback is captured and addressed, if needed, in a timely manner.</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:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>Identifying and meeting learning needs is a significant focus at Impac. Course delivery, resource materials and sample case studies are customised for appropriateness to the trainees and client organisations. The roles of learning designer, client relationship manager and project manager play a major part in ensuring that the courses deliver the training outcomes that clients require.</p> <p>The organisation has robust moderation process which include external pre- and post-assessment by the relevant industry training organisation (ITO). Internal moderation is regular and scheduled, and ensures that all trainers have assessments moderated annually. Clear processes are in place to ensure consistency of delivery as well as marking of assessments – this includes peer review and trainers’ fortnightly meetings.</p> <p>NEBOSH assessment materials are sourced from NEBOSH UK as a requirement of their accreditation and may not always be applicable to the New Zealand context. While Impac ensures that delivery is tailored to the learners’ situation for the learning to be relevant, the PTE may assist learners better by preparing them for the assessments.</p> <p>A three-year cycle review of courses and resource materials ensures that no courses are outdated in terms of content, legislative requirements and/or unit standard version. There is regular reflection on what is working and what needs improvement. Trainees and client organisations confirmed that courses are relevant, engaging and provided good value.</p> <p>Trainer and trainee feedback is gathered after each course, along with naturally occurring feedback such as comments, emails or text messages, which inform decisions and identify improvement opportunities.</p> <p>Stakeholders confirmed their satisfaction with and total confidence in Impac’s courses, and confirmed that the organisation is responsive and adaptable to their training needs,</p>

	and has a high level of client care.
Conclusion:	Meeting learner and stakeholder needs is a top priority for Impac, and systems are in place to ensure this happens.

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>The design of the courses – based on needs analysis or on regulatory and compliance requirements – means that the organisation understands well the learning goals of the trainees and the client organisations. Impac listens to and is responsive to trainee and client feedback. An example of this is the adjustment made to the delivery of the NEBOSH programmes, which saw a reduction in face-to-face interaction and an increase in digital delivery, i.e. webinars and video classes, and online support, following suggestions from trainees. These changes were approved by NEBOSH UK.</p> <p>Impac is proactive in understanding and identifying learning needs, and minimising barriers to learning. The organisation endeavours to understand learning needs. Starting with the enrolment process, the training coordinator ensures that trainers are aware of any enrollees with learning needs. Trainers are mindful during course delivery of identifying trainees needing extra assistance. Reader/writers, as well as extra time for assessment, have been provided to trainees in the past.</p> <p>Trainees get good study advice from the trainers, and feedback on their work is received in a timely manner.</p> <p>Client organisations confirmed that Impac is responsive and accommodating to their needs and requests.</p>
Conclusion:	Effective systems are in place to ensure that trainees are supported in their learning, and that barriers to learning are minimised. Trainees and client organisations are highly satisfied with the support they receive.

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	<p>Impac has a clear strategic plan and direction which is aligned to their mission and purpose. The governing team of four directors have strong industry, governance and management experience. As three of the four directors are directly involved in the daily operations of the business, issues and concerns are brought to their attention and addressed in a timely manner.</p> <p>A well-qualified academic leadership team supports the directors. Trainers are health and safety professionals with adult teaching qualifications, and are active and well-networked in the industry. Systems are in place to support staff in their jobs – performance review is an annual activity, new trainers are supported by a comprehensive induction programme which includes mentoring by senior staff members, and the wellbeing of staff is increasingly becoming a focus.</p> <p>Management is open and approachable, provides staff flexibility in their work schedule to fit family and other commitments, and is keen to support their professional development plans. The low attrition at Impac is a testament to staff satisfaction, and that relationships, not only with clients but internally, are important to the organisation.</p> <p>Celebrating its twentieth year in 2019, Impac has a sustainable business model and is always innovating and looking for ways to improve its training. This is evidenced by its recent collaboration with a wellness advocate to offer a wellbeing course, and a subcontracting arrangement to offer training on drug testing.</p> <p>Resources and systems are reviewed to ensure they are sufficient and fit for purpose, i.e. a new student management system and regularly reviewed quality management system.</p> <p>The bi-monthly formal directors' meeting supplements the more regular informal discussions, and has a comprehensive coverage of topics about the PTE's operations.</p>
Conclusion:	The strong governance and management team underpins the effective systems in place to ensure that educational

	achievement is relevant and remains high.
--	---

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Compliance is Impac’s business, and for the most part the directors and staff manage their compliance accountabilities well. The bi-monthly directors’ meeting includes a discussion and updates on the organisation’s compliance responsibilities.</p> <p>Impac works closely with their accountant, legal advisers and education consultants to ensure good financial, legal and education oversight.</p> <p>Compliance requirements with NEBOSH are fully met, as evidenced by continuous accreditation since 2009, and the Gold Learning Partner Status awarded to the organisation in 2019.</p> <p>In the main, Impac understands its compliance accountabilities with NZQA – there is a thorough process for the selection of temporary delivery sites which complies with health and safety requirements; the NZQA-approved training scheme is being delivered at least once every 12 months; participation in moderation activities is regular; and required annual attestations are submitted in a timely manner.</p> <p>However, the recent change of ownership, where 22.3 per cent of shares were sold in December 2017, was not submitted to and approved by NZQA. This is in breach of Section 5.1.1(b) of the NZQA Private Training Establishment Registration Rules 2018. This states that the PTE is to seek NZQA approval where the ownership of the PTE changes, prior to the ownership change taking place. This oversight impacts on the rating for this key evaluation question. Impac has now submitted an application to NZQA for the retrospective approval of the sale of shares.</p>
Conclusion:	Compliance responsibilities are generally managed well. However, the organisation failed to identify a significant NZQA requirement in not seeking approval for sale of shares in December 2017.

Focus Areas

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

2.1 Focus area: Health and Safety Representative Stages 1-4

Performance:	Excellent
Self-assessment:	Excellent

2.2 Focus area: NEBOSH International Diploma in Occupational Health and Safety, and NEBOSH International General Certificate in Occupational Health and Safety

Performance:	Excellent
Self-assessment:	Excellent

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 Impac Services Limited support NEBOSH trainees by better preparing them for assessments. These are generic and written by NEBOSH UK, and are not normally centred around the New Zealand context.

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.

NZQA requires Impac Services Limited to obtain approval for the change of ownership, as per Section 5.1.1(b) of the NZQA Private Training Establishment Registration Rules 2018. As of this writing, the change of ownership application had been submitted to NZQA by Impac.

Appendix 1

Table 1. Health and Safety Representatives Stages 1-4 achievement data

Courses	Total pass/total no. of trainees (pass rate)			
	2016	2017	2018	2019*
HSR 1	3309/3309 (100%)	2067/2077 (99.5%)	2606/2606 (100%)	1476/1482 (99.6%)
HSR 2	667/667 (100%)	693/693 (100%)	823/834 (98.7%)	293/572 (51.2%)
HSR 3	263/263 (100%)	130/165 (78.8%)**	292/292 (100%)	110/110 (100%)
HSR 4	148/148 (100%)	3008/3053 (98.5%)	3861/3872 (99.7%)	1934/2219 (87.2%)

*2019 data is up to 2 August 2019

**Trainees completed the course but opted not to have the unit standards.

Source: Impac Services Limited

Table 2. NEBOSH certificate and diploma achievement data

Courses	Total pass/total no. of trainees (pass rate)			
	2016	2017	2018	2019*
NEBOSH certificate**	284/303 (93.7%)	176/249 (70.7%)	201/256 (78.5%)	89/122 (72.9%)
NEBOSH diploma***	14/21 (66.7%)	12/27 (44.4%)	12/24 (50%)	6/8 (75%)

*2019 data as at 13 September 2019

**NEBOSH certificate comprises three exams.

***NEBOSH diploma comprises three exams scheduled by NEBOSH UK, plus a workplace project.

Source: Impac Services Limited

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 fraud⁴*
- *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.*

⁴ 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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz