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External Evaluation and Review Report



ProAction Medical Limited

Date of report: 2 November 2018

About ProAction Medical Limited

ProAction Medical offers first aid and other related training for the maritime sector. It is backed by expertise from the parent worldwide operation, International SOS.

Type of organisation:	Private training establishment (PTE)
Location:	Level 26, PWC Tower, 188 Quay St, Auckland 1010
Code of Practice signatory:	Not a signatory
Number of students:	Domestic: 549 student enrolments Approximately 10 equivalent full-time students International: Nil
Number of staff:	Four full-time and three part-time
TEO profile:	https://www.nzqa.govt.nz/providers/details.do?providerId=766667001&site=1
Last EER outcome:	Highly Confident in educational performance and Highly Confident in organisational self-assessment
Scope of evaluation:	Consent to Assess first aid unit standards 6400, 6401 and 6402
MoE number:	7666
NZQA reference:	C35462
Dates of EER visit:	4 and 5 September 2018

Summary of Results

ProAction Medical has a long history of providing quality maritime-focussed emergency medical training. Clients and learners hold them in high regard. There are some gaps in governance and educational management.

Not Yet Confident in educational performance

- Close to 100 per cent of learners are well supported and achieve competency on the first aid short courses.
- Learners gain significant value because the courses closely match client and learner needs (i.e. coastal yachties and coastguard volunteers being prepared to respond to medical emergencies at sea).

Not Yet Confident in capability in self-assessment

- Courses match the requirements for the first aid unit standards, 6400, 6401, and 6402.
- All trainers are suitably experienced and credentialed to meet the New Zealand Resuscitation Council (NZRC) guidelines, but not all meet the requirements for assessing against the first aid unit standards.
- Client organisations have contracted with ProAction for up to 10 years and state they value and trust the quality of the training.
- Assessment processes and the moderation of assessment is not as robust as it should be.
- With changes to company ownership and New Zealand-based staff, ProAction's owners had overlooked some significant compliance requirements. For example; the owners, made ProAction 'dormant' breaching PTE Registration rules, not fully meeting NZRC guidelines and good practice for assessment and moderation, an incomplete quality management system, and delivering the STCW course without approval from Maritime NZ.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Close to 100 per cent of learners successfully complete their course. While this is normal for first aid short courses, it is still a very good result. Learner evaluations and interviews with client organisations showed a high level of satisfaction with the training: e.g. ‘exceeded my expectations’, and ‘never any concerns over 10 years’. However, there are weaknesses in assessment and moderation of assessment, which can potentially weaken achievement validity (see 1.3).</p> <p>The courses are providing learners with the confidence to apply their skills in a maritime environment, contribute to safety of personnel at sea, and to meet Coastguard NZ volunteer requirements. This was confirmed in interviews.</p> <p>Ethnicity has not been recorded at enrolment, but ProAction will now record this. While this is a requirement for all registered providers under the Tertiary Education Strategy, an achievement rate of close to 100 per cent means there is little chance for disparity across ethnic groups.</p> <p>ProAction’s records and documentation of learner achievement is robust. They have recently included ‘smartsheets’ which are accessible worldwide, so education teams based overseas can support the New Zealand operation. However, there are some gaps in the analysis of information (as noted for ethnicity). The PTE does not survey the learners of all courses or maintain all surveys on the database for review and reflection.</p>
Conclusion:	While achievement is on a par with other first aid providers, the quality of assessment potentially affects the validity of achievement. Self-assessment processes need to be strengthened.

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

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>All courses are short, between one and five days. Learners gain valued maritime credentials of STCW certification (International Convention on Standards of Training, Certification and Watchkeeping) as approved by the International Maritime Organisation (IMO)², Coastal Medic, Search and Rescue (SAR) Medic, and Maritime Medic. This gives learners the knowledge and skills to provide medical assistance at sea. These credentials provide required first aid and emergency medical skills for recreational yachties, volunteer roles with Coast Guard NZ, and onboard crew for large vessels. While the parent company International SOS Ltd (Singapore) has Maritime and Coastguard Agency (MCA)³ certification to deliver the STCW course, they do not have approval from Maritime NZ, as required under the New Zealand Maritime Transport Act 1994.</p> <p>Client organisations and learners are very satisfied with the value gained from ProAction’s courses, with some clients having long standing relationships of 10 years or more. Client feedback includes, for example, ‘extremely happy with the quality of the relationship and delivery’.</p> <p>ProAction occasionally surveys learners’ satisfaction with their training, and reflects on this, but there is little documentation of the informal feedback from client organisations. Documentation would enhance their ability to reflect on or identify potential emerging issues. However, there are indicators of high client satisfaction, such as long-term contracts, and anecdotal feedback of satisfaction, and evidence of some improvements.</p>
Conclusion:	ProAction is adding significant value to its learners and client organisations, but surveys could be more frequent. One course, STCW, has not been approved by Maritime NZ for delivery in New Zealand.

² <http://www.imo.org/en/About/Pages/Default.aspx>

³ MCA Maritime and Coastguard Agency UK
<https://www.gov.uk/government/organisations/maritime-and-coastguard-agency>

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Courses are tailored for client organisations' specific needs and context. They are effective in engaging learners and providing scenarios relevant for practising the knowledge and skills involved.</p> <p>Resources are up-to-date, relevant to the training offered, and reflect the reality that learners will face providing first aid and medical care at sea, in situations where land-based rescue may be some hours or days away. This is acknowledged and appreciated by learners and clients.</p> <p>All tutors are relatively new to ProAction, joining since the last EER, and hold NZ Resuscitation Council Instructor Certificate L2 or higher. While not all hold the required adult teaching credentials for delivering first aid training, there are plans to complete unit standard 4098 <i>Use standards to assess candidate performance</i> soon.</p> <p>The main assessment process is through practical demonstration, and no concerns or complaints were noted with this. Some theory multi-choice assessment questions were ambiguous and the marking guidance for tutors was unclear. Pre and post-assessment moderation of the theory multi-choice test needs to be strengthened.</p> <p>As noted, the STCW course meets IMO requirements, as certified by MCA UK, but has not been approved for delivery by the New Zealand regulator Maritime NZ. This situation should be rectified.</p> <p>ProAction has processes to reflect on programme design and learner engagement, and to refresh and renew resources, teaching material and scenarios as needed. The International SOS education team provides the necessary support .</p>
Conclusion:	Programmes are well designed, customised and engage learners well. Some significant concerns require attention.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Before the start of short courses, ProAction requests information about learning needs from participants. This allows them to effectively cater for any challenges that occur during training as they arise. These processes are fit for the context and length of the training.</p> <p>Teaching resources and scenarios are appropriate for the maritime-focussed training, and engage learners well, as feedback and survey results show. Learners get immediate feedback on their competence while on course, as is appropriate for first aid training.</p> <p>ProAction is mindful of keeping the tutor-learner ratio to approximately 1:16 – 1:20, ensuring all learners get personal attention and opportunities to engage in practical scenarios and demonstrate knowledge and competence.</p> <p>Client organisations carry out some course surveys and not all courses are surveyed. This is an area that could be reviewed to check there is sufficient feedback from course participants to monitor satisfaction with the support that ProAction provides.</p> <p>Gaining feedback from instructors is an area that could be explored to support the review of teaching and assessment material, through their experience of its use.</p>
Conclusion:	The PTE appropriately checks, monitors and addresses learner needs. Learners are actively involved in their learning.

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

Performance:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>ProAction is well supported by its parent company, Singapore and Australian-based International SOS Ltd. This support includes governance and management, an education team, and financial backing. There are weekly interactions via conference calls and less frequent visits from the Australian-based Business Development Manager. Programmes are well resourced, and the PTE is well-stocked with teaching materials and related training aids. The organisation uses 'Smartsheet' software to record and track organisational performance. This is accessible worldwide, facilitating easy reporting and communication.</p> <p>The New Zealand-based Training Co-ordinator reports on education matters to the Sydney-based manager of International SOS, providing an external point of oversight. The International SOS Education Team based in various parts of the world also has oversight over programmes.</p> <p>There is a gap in the academic oversight in New Zealand to ensure that ProAction meets all New Zealand law and NZQA Registration requirements (as noted in sections above). With staff turnover there has been a lack of clear detailed procedures in the organisation's quality management system and a lack of supporting documents to ensure all quality processes were continued.</p> <p>The PTE has reported learners' credit achievements of the three first aid unit standards, 6400, 6401 and 6402 within the required three months.</p>
Conclusion:	ProAction has a strong focus on supporting educational achievement in the context of maritime first aid. There have been some lapses in the academic and governance oversight, impacting on the PTE's effectiveness in ensuring sound education processes.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>With changes to company ownership and New Zealand-based staff, some compliance requirements have been overlooked. This includes some PTE Registration rules, not fully meeting NZRC guidelines or good practice for assessment and moderation, and gaps in the quality management system (QMS). The QMS is primarily comprised of policy statements with incomplete procedures. This should be addressed to be fully compliant with NZQA rules.</p> <p>There have been some significant lapses in organisational self-assessment. The New Zealand Registered Company, ProAction Medical Ltd has been 'dormant' (no financial activity) for some years. NZQA's Risk Management team identified this through financial monitoring. NZQA and International SOS have agreed to reactivate ProAction to meet NZQA Registration requirements. ProAction tutors delivering the STCW course in New Zealand, under International SOS' MCA UK approval, is a breach of the Maritime Transport Act 1994 and Maritime NZ Rules 32 and 35. ProAction has not been notifying NZQA of all temporary sites as required.</p> <p>ProAction has been delivering its training scheme as approved in a range of situations to suit client organisations' contexts and requirements.</p>
Conclusion:	There have been several lapses in the management of compliance. This has partially stemmed from the parent company misunderstanding NZQA PTE Registration Rules and Maritime NZ Rules. Self-assessment processes are not sufficient and ProAction has not self-identified these issues.

Focus Areas

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

2.1 Focus area: Maritime First Aid programmes

Performance:	Good
Self-assessment:	Marginal

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 ProAction Medical Limited:

- Strengthen assessment and moderation practices.
- Record learner ethnicity at enrolment and monitors relative achievement and value of the training.
- Develop a more structured and documented process to collate and review feedback from client organisation.
- Review processes for learner survey for sufficient coverage, as currently only some courses are surveyed, and some by client organisations, not ProAction.
- Review and strengthen policies and procedures for monitoring compliance.
- Review and strengthen staff understanding of organisational self-assessment.

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 ProAction Medical Limited to:

- Ensure all tutors meet all of NZRC good practice guidelines <https://www.nzrc.org.nz/>, and Consent and Moderation Requirements (CMR 230) <https://www.nzqa.govt.nz/nqfdocs/maps/doc/0230.doc>
- Gain Maritime NZ approval for delivery of the STCW course within New Zealand to meet the Maritime Transport Act 1994 and Maritime NZ Rules 32 and 35 (as identified by Maritime NZ).
- Develop its quality management system to have sufficient actionable procedures for all policies (to meet Private Training Establishment Registration Rules part 5.1.7).

Appendix

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 according to 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 for Tertiary Education, Skills and Employment.

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. The requirements are set through the Programme Approval and Accreditation Rules 2018, which 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.

In addition, the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016 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 2013 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 and/or 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). The Quality Assurance (including External Evaluation and Review (EER)) Rules 2016 are available at <https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/qa-rules/external-evaluation-rules-2016/1/>, 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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