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External Evaluation and Review Report

Training in Action Limited

Date of report: 29 July 2019

About Training in Action Limited

Training in Action is a small, family-owned private training establishment, delivering short courses in the workplace or to volunteers in community settings. The directors and trainers are specialists and current practitioners in their areas of teaching. The PTE also provides training in Niue and Tonga.

Type of organisation:	Private training establishment (PTE)
Location:	Ormsby Road, RD 6, Pirongia
Code of Practice signatory:	No
Number of students:	Domestic: approximately 1,000 enrolments per year (7.25 EFTS (equivalent full-time students) in 2017)
Number of staff:	One full-time and eight part-time staff
TEO profile:	See NZQA website
Last EER outcome:	June 2015: Confident in both educational performance and capability in self-assessment. There have been no new programme applications to NZQA since July 2014, when the PTE changed ownership.
Scope of evaluation:	Two areas of training: Working at Heights, and Fire Safety Training in Action receives no government funding.
MoE number:	8282
NZQA reference:	C33428
Dates of EER visit:	2 and 3 April 2019

Summary of Results

Training in Action courses are delivered by experienced, capable and current trainers. The courses meet important health and safety-related needs within industry and the volunteer sector. Self-assessment processes are generally suitable. However, quality management processes supporting assessment need improvement before NZQA can be confident in the PTE's self-assessment.

Confident in educational performance

- Training in Action's vision, mission and values are reflected in the scale of their operation and the quality of training and physical resources used. Trainers' in-depth understanding of the critical aspects of the courses they teach is a strength.
- The training being delivered is appropriate and valuable in terms of content and the intended outcomes of raising awareness, providing technical skills and keeping people safe.

Not Yet Confident in capability in self-assessment

- Stakeholders strongly support the overall quality of the PTE's training, the match to their needs, and the way the training delivery engages participants.
- Course delivery is routinely customised to match site requirements and the standard operating procedures of companies commissioning the training. This leads to high relevance, applicability of skills and knowledge, and highly satisfied participants.
- The main performance limitation identified was the variable performance in external moderation in 2018. This touches on the currency of materials, conformity with quality assurer expectations, and the PTE's internal oversight of that. As such, it has had an impact on numerous key evaluation question ratings and led to a Not Yet Confident rating in capability in self-assessment.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>For the focus area training (Fire Safety and Working at Heights) pass rates are 100 per cent for the approximately 300 learners enrolled in 2017. Participation and achievement data across all learner groups is collated and shows positive results. Training in Action point to aspects of their training which incorporate kaupapa Māori principles as a contributor to the quality and success of the training for all participants. Pass rates in other courses, which also include unit standards (such as First Aid and Confined Space), are similarly high for a much smaller number of participants.</p> <p>External moderation conducted by industry training organisations (ITOs) has been sporadic since the previous EER. However, in 2018 moderation for breathing apparatus, working at heights and first aid standards did not meet ITO requirements. In the case of working at heights, an out-of-date version of the unit standard was used. These assessment materials were purchased from a reputable commercial supplier. From 2019, Training in Action has implemented a plan to design its own assessments and have them pre-moderated by the relevant ITO. Training in Action were also externally moderated against standards 29315 and 17599 and their assessments approved.²</p> <p>Trainers include a ropes rescue specialist, and training locations include: cell tower rescue training in Tonga; training using FMG Stadium Waikato's lighting towers (50m); training conducted on cliff-faces over the Waikato River (47m). The complexity and risk associated with participant learning, and their achievement, in some courses is notable.</p>
Conclusion:	Trainees receive quality training in relevant skills and

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 29315 Describe the role and functions of the Health and Safety Representative in a New Zealand workplace; 17599 Plan a confined space entry.

	knowledge. Confirmation of assessment quality needs to occur.
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1.2 What is the value of the outcomes for key stakeholders, including students?

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>The value of the outcomes of Training in Action’s activities range from raising awareness of safe practices in the home, through to providing the workforce and community with people competent to engage in complex rescue and recovery activities. Examples (not all of which are NZQA-related) include:</p> <ul style="list-style-type: none"> • Ground-based rescue training for Red Cross volunteers. • Accredited breathing apparatus training for 78 locomotive engineers working in the Otira Tunnel. This linked to, and satisfied, WorkSafe requirements. • ‘Leadership in Emergencies’ training related to mines rescue activities. • Training for airport emergency services personnel in working safely at heights. • Various safety and rescue-related training to Niue police, ambulance and fire staff. <p>The documentation around these activities reflects high capability in planning and co-ordinating training to multiple audiences, which meets their needs. As mentioned under 1.3 and 1.4, involving trainers more in self-assessment may assist in deriving a fuller picture of the training quality and impacts.</p> <p>Moderation concerns around some assessment materials detracts somewhat from the otherwise high value of the outcomes of Training in Action activities. The Skills Organisation ITO and NZQA are key stakeholders in this context. Skills is required by NZQA to moderate assessments against the ITO’s unit standards to ensure assessor decisions and judgements are fair, valid, consistent, sufficient and authentic; and reduce variations of interpretation of a unit standard over time. There have been lapses in performance here.</p>
Conclusion:	Training in Action provides a wide range of training from basic to advanced, which adds value and helps keep people safe.

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>Course delivery is routinely customised to match the site requirements and/or the attributes of the participants. This may, for example, include referencing the standard operational procedures of companies commissioning the training, or the goals and requirements of search and rescue. This leads to high relevance, applicability of skills and knowledge, and highly satisfied participants. Participants are routinely provided with post-course evaluations which collectively show high rates of satisfaction.</p> <p>Trainers delivering the majority of courses are active as firefighters or ambulance officers and as such undergo continuing professional development.³ A close analysis of the trainer's qualifications and experience against the related consent and moderation requirements (CMR)⁴ was conducted on site. There was a strong match.</p> <p>A summary report is provided to the organisation commissioning the training, and this serves to formally document and review each training event, the achievement of participants, and any aspects of note. This is a strong example of ongoing monitoring and review. What would significantly improve self-assessment would be a comprehensive course/topic review involving all trainers and management over a planned cycle. Currently there is a separation between trainer course delivery and the need for comprehensive organisational self-assessment.</p>
Conclusion:	Programme design and delivery are robust. Training delivery consistently matches industry needs. Self-assessment has been less convincing and needs strengthening.

³ For example, 'the development of [Firefighters] skills, and refreshers completed on the job, is monitored using a traffic light system, which is part of the organisation's training and progression system used to track individual firefighter competency levels and ensure that refreshers occur at required intervals'. Source: Fire and Emergency New Zealand EER report, March 2018

⁴ In this case, 0039 and 003. A CMR is an approved document, listed on the Directory of Assessment Standards (DAS), that sets out various requirements for the standards listed in its scope.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>Student support is not a particular feature of the type of training delivered by Training in Action, but suitable written guidance is provided through training materials, presentations, handouts and assessment materials. Cohorts of participants are small, and individual coaching and explanations are provided depending on learner need. The trainers are effective communicators. A limit of one formal reassessment is in place, but this is not commonly needed due to the students having industry experience.</p> <p>Interviews with a selection of industry stakeholders, participants in the training, and trainer interviews confirm that close attention is paid to delivering training in a way that involves participants and assists with the assimilation of knowledge and skills. Transfer of safe practice and knowledge to the workplace is important to stakeholders, but not something that is particularly measured or evaluated by them or by the PTE (see also 1.2).</p> <p>Fundamental to this constructive involvement by participants is the currency of the trainers' knowledge and skills, and their in-depth topic knowledge. Trainers hold qualifications at certificate and diploma levels (at least) and have significant experience in responsible positions. This experience is in settings where the skills taught have been applied in emergency situations, including the Christchurch earthquakes. This brings a realism to the training as actual events are used to provide context to the theory.</p> <p>A recommendation in the 2014 EER report to inform the trainees of academic rules and the penalties for plagiarism, in a standardised way, has been implemented. Training in Action says it has – quite rightly – declined requests by some companies to offer courses in a more compressed timeframe to reduce contact time and price per participant.</p>
Conclusion:	Support for training participants is positive, and strategies ensure the training is engaging and provides plenty of time to practise skills and techniques.

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Training in Action has competent and experienced director/managers. They lead an agile organisation which, in addition to offering compliance-type safety courses, also delivers unique higher-level and more complex bespoke training in, for example, urban search and rescue and rope rescue at significant heights. They have successfully taken training off-shore to Niue and Tonga. The organisational purpose and direction is clear, and there is significant investment in training resources.</p> <p>Data analysis has improved since the previous EER. Records of management monitoring and decision-making are comprehensive. Processes for ensuring consistency between trainers include co-teaching, but do not extend to formal appraisal or trainer involvement with internal moderation. There are some non-critical limitations to trainers' engagement with the PTE's self-assessment due to the scale of the organisation and the part-time status of most staff. Among the trainers are station officers, senior firefighters and people with leadership experience in disaster response. The issue is not lack of capability, but possibly time allocation to better connect training delivery with review and quality assurance processes.</p> <p>Training in Action management indicates that the ongoing restructuring and changes in the ITO sector (and to a lesser extent at NZQA⁵) have led to a lack of clarity and continuity of communications at times. Based on email records, this is credible and is also regrettable.</p>
Conclusion:	In almost all respects, Training in Action is a high-performing organisation. The PTE has high capability, a solid core of long-serving trainers, and good systems. However, quality management processes supporting trainee assessment need improvement before NZQA can be confident in the PTE's capability in self-assessment (see also 1.6).

⁵ Such as the removal of sector relationship managers and changes to staff contacts and responsibilities in Approvals and Accreditation.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>One of the directors assumes primary responsibility for monitoring and maintaining compliance with NZQA and ITO requirements. This has been a relatively informal process, reliant on responding to notifications and updates in a timely manner. All attestations and annual reports to NZQA have been provided in a timely manner. That said, there is an opportunity for a more explicit compliance management plan or schedule to be included as part of the PTE's quality management system.</p> <p>A subcontracting arrangement with a non-NZQA provider was terminated at the end of 2015. This effectively closes off a recommendation in the 2014 EER report.</p> <p>Training in Action continues to offer its NZQA-approved training scheme, Essential First Aid. Assessments for first Aid unit standards 26551 and 26552 were not approved by Skills ITO in 2018. These standards will not be delivered again and will be replaced by 6401 and 6402 in 2019. Assessment material for these first aid unit standards was submitted to Skills for pre-moderation, and only minor changes were required for approval.</p> <p>Training in Action actively monitors health and safety-related compliance related to the discipline areas taught (e.g. safety standards around working at heights). Trainers' knowledge and understanding of the critical aspects of the courses taught is a notable strength.</p>
Conclusion:	<p>Compliance accountabilities are suitably managed. The PTE engages with NZQA and ITOs as required. However, the outcomes of external moderation have been variable in 2018 and this could have been better managed, with closer attention to version control of materials and closer adherence to the procedures and tools within the PTE's quality management system.</p>

Focus Areas

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

2.1 Focus area: Working at Heights training

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	This is an area where Training in Action demonstrates unique capabilities. Trainers have subject expertise and currency. Nevertheless, under external moderation unit standards 15757 (installing height safety systems) and 23229 (using safety harnesses) did not meet requirements. ⁶ Version 3 assessment materials, which expired in 2016, had been used. Skills ITO has received an improvement plan from Training in Action informing that they will redesign assessment material for the current version and send this for pre-moderation.
Conclusion:	The gaps in moderation – though significant – are to an extent mitigated by trainer expertise and the use of companies’ standard operating procedures as the focus of the training delivery.

2.2 Focus area: Fire Safety training

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	This focus area includes standards 18408 fire warden (43 learner results reported in preceding 12 months); 3271 suppress fire (183 results reported), 4647 explain principles of fire science (184 results reported). Although there has been no external moderation by the ITO since the previous EER, the correct versions of the standards have been used as have suitable assessment practices. The content is taught and assessed by current, experienced firefighters.
Conclusion:	This is a solidly performing area of training for a significant

⁶ Fifty-nine learner results were reported to NZQA in the past year for 15757, and 55 for 23229.

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 Training In Action Limited:

- Introduce some form of formal and collaborative, cyclical course/topic review process which involves all trainers.
- Consider formalising trainer appraisal processes.
- Review and re-launch those components of the quality management system which touch on programme review; assessment and internal moderation; and compliance management.
- Continue with finalising the completion of the assessment redevelopment plan as soon as practicable.

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

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 fraud⁷*
- *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.*

⁷ 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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