

Report of External Evaluation and Review

Bay of Plenty College of Homeopathy
trading as College of Natural Health
and Homeopathy

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 31 August 2015

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Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.

Introduction

1. TEO in context

Name of TEO:	Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy (CNHH)
Type:	Private training establishment (PTE)
Location:	382-386 Manukau Road, Epsom, Auckland
Delivery sites:	382-386 Manukau Road, Epsom, Auckland Suite 10, 143 Durham Street, Tauranga 114 Sawyers Arms Road, Christchurch
First registered:	16 February 1998
Courses currently delivered:	<ul style="list-style-type: none">• Diploma in Homeopathy (Level 7)• Diploma of Homeopathy (Animal Health) (Level 7)• Bay of Plenty College of Homeopathy Certificate in Homeopathy (Level 5)
Code of Practice signatory?	Yes, for students aged 18 and above
Number of students:	Domestic (as at September 2014): 98 equivalent full-time students (EFTS) (108 students), which is 52 per cent of the total number of students – 8 per cent Māori (14), one Pasifika student, 71 per cent Pakeha, 21 per cent Asian International: 87 international students, which is 48 per cent of the total number of students. International College of Homeopathy delivers

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training on behalf of CNHH under a memorandum of understanding. International College of Homeopathy is not an NZQA-registered provider, but the subcontracting arrangement has been approved by NZQA. The memorandum of understanding and related licence agreement specify the responsibilities and obligations of each organisation. Whereas most of the CNHH students are domestic (108) and few are international (five), most International College of Homeopathy students are international (82) and few are domestic (eight).

Number of staff:

Five full-time equivalents

Scope of active accreditation:

Domain consents to assess in Core Health (to level 6), First Aid (to level 6) and Homeopathy (to level 7) consistent with the programmes and courses referred to above. CNHH also has consents to assess standards in Community Support Services, Health and Disability Principles in Practice, and Whānau Ora and Community Support.

For further information, go to

<http://www.nzqa.govt.nz/providers/nqf-accreditations.do?providerId=847935001>

Since CNHH gained its consents to assess, the homeopathy unit standards have lapsed and are unlikely to be updated in light of the Targeted Review of Qualifications (TRoQ).

However, in association with two other TEOs which no longer provide homeopathy, CNHH developed what were referred to as 'training standards' as their assessment tool to provide continuity and consistency at least until the TRoQ process is completed.

Distinctive characteristics:

Endeavour Learning Group acquired CNHH in 2008 from the founding director of Bay of Plenty College of Homeopathy. Endeavour Learning Group became a shell company on sale to Vocation Limited as of 1 July 2014. In addition to NZQA's registration of CNHH as a private training establishment, all Australian and New Zealand homeopathy education registrations are governed

by the Australian College of Natural Medicine PTY Limited.

CNHH is the only PTE providing education and training in homeopathy in Aotearoa New Zealand. It has sites, staff and learners in Auckland, Tauranga and Christchurch. The Tertiary Education Commission (TEC), under Student Achievement Component (SAC) funding, purchased a total of 111 EFTS from CNHH for all of 2014, which equates to approximately 123 students.

The diploma programmes are provided face-to-face and by distance.

Recent significant changes: The founding director and principal left in 2012. CNHH now has two joint managers, the general manager academic and the college dean, and the general manager operations – both of them employed by CNHH for the past 12 years. The joint managers report to the Endeavour chief executive.

Increased profitability and funding support has given CNHH the financial resources to improve its services and processes. In 2013 CNHH networked its sites so that relevant information is accessible to all relevant staff. The CNHH website and all promotional material has been reviewed and revised using Endeavour technical and marketing expertise. Online learning has been developed and introduced, starting with year 1 attending and distance students.

Previous quality assurance history: At the previous external evaluation and review (EER) of Bay of Plenty College of Homeopathy, NZQA was Confident in its educational performance and Highly Confident in its capability in self-assessment.

In 2010, Bay of Plenty College of Homeopathy worked successfully with NZQA to address issues relating to assessment and moderation for 2006-2010, to the satisfaction of the NZQA Risk team. Since the lapse of the homeopathy unit standards, CNHH has not assessed unit standards and is not subject to NZQA external moderation.

2. Scope of external evaluation and review

The focus areas, which were agreed with CNHH, were:

- Diploma in Homeopathy (Level 7) (432 credits)/Diploma of Homeopathy (Animal Health) (Level 7) (424 credits). This focus area was selected because these are the two programmes currently provided concurrently by CNHH. The programmes are usually completed over four years. They are provided face-to-face for most international students and by distance for some – and to domestic students by intensive face-to-face or flexible distance delivery. The EER included the subcontractor, International College of Homeopathy.
- Distance programme. This focus area was selected because it is an important mode of delivery, and about half of CNHH's students choose to study in this way. Students who are studying face-to-face can also choose to do so by distance and vice versa on as-needs basis.
- Governance, management and strategy is a mandatory focus area for all TEOs (other than industry training organisations).

3. Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published policies and procedures. The methodology used is described fully in the web document Policy and Guidelines for the Conduct of External Evaluation and Review available at: <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction>. 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.

Two evaluators conducted the EER over two days at the Auckland site. They interviewed the following people:

- Chief executive officer of Endeavour Learning Group, who is also the chief executive officer and director of CNHH (by video-conference)
- Two CNHH general managers, one of whom also tutors
- South Island coordinator who also tutors
- Tauranga office manager who also supports Māori learners
- Independent contractors who tutor but are also members of the academic team and one of whom is the animal health course coordinator
- Auckland year 1-4 students; graduates in Auckland (face-to-face) and Tauranga (by Skype).

The evaluators also spoke to a similar range of students, graduates and tutors and the director from the subcontractor organisation, International College of Homeopathy.

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Homeopathy. The evaluators also spoke to stakeholders such as employers. The evaluators sighted a range of documents provided before, during and subsequent to the EER.

Summary of Results

Statement of confidence on educational performance

NZQA is Not Yet **Confident** in the educational performance of **Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy**.

The main reasons for this judgement are:

- According to the TEC, SAC-funded domestic student educational performance data (based on information submitted by CNHH), course completions and retentions have improved overall in the past five years. Qualification completions are more variable. (See Findings 1.1.)
- The programme completion rate for SAC-funded Māori students is approximately the same as the CNHH average for all students due to increased support for Māori learners. (See Findings 1.1 and 1.2.)
- The SAC-funded domestic student retention rate is not as strong, mainly because successful completion is over four years of two-day monthly intensives and/or distance learning, and some students take time out during this period. In addition, approximately 40 per cent of students enrolled at the time of the EER visit were in year 1, including medical health professionals who also commonly finish only year 1. (See Findings 1.1 and 1.2.)
- Based on the information provided by CNHH and its subcontracted organisation, international student course and qualification completions have varied in 2011, 2012 and 2013. (See Findings 1.1)
- Medical health professionals gain knowledge, understanding and appreciation of natural health and homeopathy, which informs their own practice and ability to work collaboratively with the wider health sector and alternative health practitioners. (See Findings 1.1 and 1.2.)
- Students, and graduates in particular, achieve a range of professional and personal outcomes. Attainment of the diploma enables and supports a significant proportion of graduates to practise natural health and homeopathy – graduates are employed in a private capacity and in retail, health shops and pharmacies. The outcomes that graduates gain also benefit themselves and their immediate family members, as well as members of their extended families and whānau – CNHH and some students and graduates report that their health improves as a consequence of effective diagnosis and use of appropriately prescribed and used remedies. (See Findings 1.2.)
- CNHH matches students' needs well by enabling them to learn face-to-face or by distance or a blend. (See Findings 1.3.)

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- Tutors are widely experienced, currently practising and actively participating in natural health and homeopathy professional communities of practice. This enhances the effectiveness of their teaching and the learning that takes place, including the practical clinical training and live case studies. Inconsistencies with regard to tutor recruitment, appraisal and assessment and moderation have some impact but are mostly managed effectively. (See Findings 1.4.)
- Guidance and support have been further developed and improved since the previous EER and management restructure, including for distance learners (about 47 per cent of CNHH learners and 18 per cent of all learners – all students attend the subcontracted organisation face-to-face). However, CNHH did not present any convincing evidence to date that shows substantive increases in distance results arising from improved support at this stage. (See Findings 1.5.)
- CNHH appears to be benefiting from its new ownership, the related changes to the governance and management of CNHH, and the experience of the Endeavour Learning Group chief executive, distance learning expertise, and additional funding and information technology resources though the benefits are not fully apparent yet. (See Findings 1.6.)

There is evidence that CNHH is meeting the most important needs of learners and other key stakeholders, and there is evidence of adequate quality in some of the processes that contribute to learning and other important outcomes. Evidence of important outcomes and/or contributing processes are patchy in areas such as distance learning and international students. Some plans have been or are being developed, but improvements are not yet sufficiently apparent to enable NZQA to be confident in the PTE's educational performance.

Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy**.

The main reasons for this judgement are:

- CNHH tracks and monitors individual students' assignment, programme and qualifications completions progress. During the EER visit, CNHH also showed its ability to disaggregate progress and completions by year group, SAC-funded and non-SAC funded EFTS, Māori and Pasifika, over and under 25s, number of standards, international and domestic, by campus, distance and face-to-face, human and animal diplomas. In some cases, the information provided conflicted. (See Findings 1.1.)
- The international student numbers in 2011 and 2012 were proportionately low (but still significant), but have been increasing in 2013 and 2014, especially in the subcontracted organisation. The evaluators were not able to readily verify international student completions data during the visit, which was of concern given that currently over 40 per cent of students are international – however, further information subsequently provided only partly confirmed the data. (See Findings 1.1.)
- Documented evidence of changes made or followed up in light of internal moderation of assessments was less clear than some recently CNHH-commissioned external moderation to level 6, which identified required changes and documented that these had been done. (See Findings 1.1, 1.2 and 1.4.)
- In 2011, 2012 and 2013 CNHH used TEC data, which is based on the TEC's processing data provided by CNHH, to benchmark its completions and retention against the medians of four other like colleges, and all PTEs. It compared itself with the other three colleges selectively and did not explain what the benchmarking showed and how CNHH was able to use the comparisons. CNHH is no longer able to benchmark itself like this as it is now the only college providing homeopathy in New Zealand. (See Findings 1.1.)
- Detailed analysis identifying, for example, student achievement patterns and trends, reasons for them (and relevant benchmarking where possible), possible changes, and evaluation of their effectiveness would contribute to improvements in performance. The same would apply to graduate outcomes and employer perspectives on the relevance and effectiveness of the education and training. (See Findings 1.1 and 1.2)
- Notwithstanding, CNHH has made changes, with the potential to effectively improve its operations. Such changes, using Endeavour technical and marketing expertise, have included networking all CNHH's venues, allowing

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improved access by relevant staff to student information and the latest version of all assignments, handouts and documents; a makeover of the CNHH website and all promotional material; and the introduction of an online learning management system. The effectiveness and success of such relatively recent changes and others are yet to be determined by CNHH – they show potential but are another reason why NZQA is at this stage not yet confident in CNHH's capability in self-assessment. (See most Findings.)

- CNHH's 2010 and 2014 graduate surveys show that the majority of CNHH graduates put their training to use as self-employed homeopaths (80-91 per cent), with a smaller number becoming employed in the natural medicine industry, for example as technicians or salespeople. The surveys do not include feedback on the relevance, value and application of knowledge and skills learned at CNHH from the perspective of both graduates and employers. Most international students apparently return home to India where their New Zealand qualification helps them enter further study and employment in medicine or business – it would be useful if CNHH gathered more information about this. (See Findings 1.2 and Recommendations.)

There is some evidence of effective self-assessment that evaluates programmes and activities on an ongoing and/or periodic basis. But it is not sufficiently comprehensive in some priority areas and is of variable quality. There is, however, evidence of some effectiveness in using findings to make improvements.

Findings¹

1.1 How well do learners achieve?

The rating for performance in relation to this key evaluation question is **Adequate**.

The rating for capability in self-assessment for this key evaluation question is **Adequate**.

CNHH has made significant progress with regard to SAC-funded domestic student course completions and retentions, in particular in 2013 compared with the median for all PTEs, as shown in Table 1. The table shows CNHH's qualification completions fell in 2013. Student progression is shown as non-applicable (NA) because CNHH does not itself currently provide students with the opportunity to progress through other related qualifications prior to, within or beyond the four-year level 7 diplomas it currently provides. The PTE is aware that some students have gone on to complete a degree in Australia, and a level 5 qualification may become available when the TRoQ process is complete.

	2009 %	2010 %	2011 %	2012 %	2013 %
Successful course completion	54 (74)	78 (81)	78 (86)	76 (85)	84 (85)
Qualification completion	37 (71)	100 (75)	59 (80)	75 (82)	40 (80)
Student progression	NA (20)	NA (22)	NA (23)	NA (23)	NA (23)
Student retention	55 (66)	53 (69)	58 (75)	59 (77)	71 (77)

Table 2 shows course and qualification completions as a percentage and how CNHH's completions have rated compared with all other SAC-funded PTEs (out of the total number of SAC-funded PTEs for the given year).

	2009 %	2010 %	2011 %	2012 %	2013 %
Course completion	54 (177/199)	78 (110/193)	78 (133/187)	76 (122/197)	84 (107/200)
Qualification completion	37 (173/194)	100 (1/189)	59 (158/186)	75 (1/18)	40 (175/190)
Student progression	55 (143/199)	53 (152/192)	58 (151/185)	59 (162/199)	71 (129/198)
Student retention	24 (20/20)	29 (20/20)	30 (18/18)	40 (18/18)	50 (18/18)

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

Successful course completion is widely regarded as the most reliable educational performance indicator of student achievement, and in 2013 CNHH was 1 per cent below the median for the PTE sector and rated 107 out of 200 PTEs. Course completion rates for international students show 67 per cent for 2011 (18 students), 83 per cent for 2012 (18 students), and 67 per cent for 2013 (42 students). These achievement results are lower and less consistent than those for domestic students. Increasing numbers of international students are attending the subcontracted organisation and CNHH expects their results will show improvement in 2014.

In 2013, CNHH introduced several initiatives to attract and retain Māori students. Māori enrolments are low but increasing – in 2012 they comprised 4 per cent of the total student population and in 2013 they were 8 per cent (14 in 2014). CNHH was anticipating a continuing upward trend in Māori participation in 2014 and beyond. The course completion for the small but increasing proportion of Māori students is equal to the CNHH average for all students. CNHH has had very low Pasifika participation, no more than one student in any year.

Successful qualification completions are a less reliable indicator because of the variables that apply, particularly in the case of CNHH and the four-year qualification. Qualification completions in particular fluctuate because learners do not complete in the set year and can take longer than one year to complete a particular year of the programme – some students do not complete, then withdraw and re-enrol later and subsequently complete. Nevertheless, having made some uneven progress in qualification completions between 2009 and 2012, in 2013 CNHH qualification completions fell – CNHH attributes some of this inconsistency to its emphasis on completions from 2010 brought about by its realisation that the national qualification was ending, but this does not fully explain the fall in 2013. Another contributing factor to course and qualifications data is that non-alternative health professionals attend year 1, which fulfils their purpose and they do not continue to complete the four-year programme. (Students receive certificates which show competency levels, attendance and results – and a separate letter offering a place in the next year). CNHH has indicated that in 2015 it intends to introduce strategies to help address fluctuations in qualification completions.

CNHH's self-assessment is inconsistent and lacks detailed analysis to include patterns and trends in programme and qualifications completions and retention and the reasons for them, changes made in light of such analysis, and evaluation of the effectiveness and success of such changes and determination of whether they are actually improvements. A partial exception to this is CNHH's identification of lower achievement by distance learners compared with face-to-face learners, and the provision of more support to address this – the extent of the success of this is as yet unclear.

CNHH systematically matches a range of international student information from the point of enrolment and entering of each student into its student management system (mainly from its subcontracted organisation), and monitors and audits

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international student information. It cross-checks information about student numbers, completions and withdrawals, and drawdowns of student fees with Public Trust three times a year to coincide with the TEC's single data return timetable. The PTE meets and visits its subcontracted organisation regularly and checks attendance report records annually – it acknowledges that this is insufficient and plans to be more active and regular in this regard along with introducing new enrolment processes in 2015. Participation, achievement and completions data for the subcontracted organisation does not appear to be as readily available and accessible in an ongoing and systematic way as it does for the CNHH students.

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

The rating for performance in relation to this key evaluation question is **Good**.

The rating for capability in self-assessment for this key evaluation question is **Adequate**.

CNHH provides a range of valued outcomes which benefit the students and a diversity of key stakeholders.

Learners and stakeholders interviewed demonstrated values consistent with those they discussed and said they had experienced, shared and gained value from the training programme – values consistent with CNHH's ethos such as warmth and genuineness, openness and growth, positivity, joy, encouragement and an holistic approach based on taking personal responsibility and ownership and ethical conduct. Such values were clearly evident to the evaluators when they interviewed learners, graduates and staff members, including governance, management, tutors, contractors and administrators. CNHH staff and tutors in particular were also aware of such values which they practised themselves. Formal evaluations did not capture such valuable outcomes very well.

According to students and graduates interviewed by the evaluators, the knowledge, experience and practical skills they gain enable them to become more knowledgeable and competent in their clinical skills and preparation of remedies. In their experience, this enhances their personal practice of natural health and homeopathy which benefits them personally and their immediate family, extended family, friends, whānau and communities. The evaluators heard stories and examples claiming successful treatment and support of those with flu, fever, childhood sickness, life crises such as cancer or diabetes or post-earthquake stress, and pregnancy. Some students interviewed also regarded natural health and homeopathy as viable alternatives to conventional health based on their being cost-effective, ecologically friendly, readily able to be conducted at home, and sustainable.

Tutors and students were impressed at the way that some conventional medical practitioners attended at least year 1 and were able to take on board and practise

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other modalities, or at least be open to a wider range of health modalities, and some even set up their medical practices alongside them. With regard to cultures such as Māori and Pasifika who have their own indigenous natural medicine traditions, CNHH has developed an approach whereby it demystifies and promotes natural health and homeopathy as additional modalities. This development is fairly recent and staff were able to talk about such valued outcomes, but so far CNHH has not formally documented them through its self-assessment practices.

CNHH conducted a graduate survey in 2010 which showed that 80 per cent of the graduate respondents are self-employed, i.e. 'in their own practice' paid or unpaid, and others are employed or employ others in natural health or homeopathy-related industries such as health food shops, pharmacies or teaching. The survey in 2014 showed 91 per cent were self-employed. Such self-assessment is useful but limited and CNHH could readily capture a wider range of responses with a more comprehensive survey tool and strategies for gaining a higher response rate. This could provide the basis for capturing information beyond destination outcomes, and better inform improvements and endorse the value of the programme.

The employer stakeholders spoken to by the evaluators were very positive and specific about the knowledge and skills of CNHH graduates. This feedback could contribute much to CNHH's operations and performance, including its stakeholder quality circle which does not currently seem to be operational. CNHH has been able to capture and use sufficient graduate destination outcomes to realise that many graduates experience difficulty in setting up their own business as a self-employed homeopath. A related 2014 initiative waiting to be implemented, the Graduate Clinical Placement project, is a joint venture between CNHH, some 2013 graduates and the New Zealand Homeopathic Society to team together an experienced homeopath practitioner with a recent graduate for the purposes of providing clinical, practical and general experience in the clinic. CNHH has evaluated different ways of supporting them, including the introduction of homeopathic research-based business management at year 4. CNHH's rather limited student evaluations and analysis could benefit from further development. Current students as well as graduates would like to be able to pathway to a natural health and homeopathy degree, which a few have done in Australia.

1.3 How well do programmes and activities match the needs of learners and other stakeholders?

The rating for performance in relation to this key evaluation question is **Good**.

The rating for capability in self-assessment for this key evaluation question is **Adequate**.

The programmes and activities match the needs of learners and other stakeholders in many ways. The CNHH website has comprehensive information which can be readily accessed. CNHH has recently developed its interview process to help ensure that potential students are fully aware of the commitment required at each year and over at least four years to succeed. The fact that one person conducts the interviews helps ensure a consistent and robust system. Potential students can sit in on training sessions, which gives them a helpful taste of what to expect. As already mentioned, the approaches used to increase Māori participation are making encouraging progress and are commented on later in this report.

One of the most important ways that CNHH matches the needs of its learners is that they can learn face-to-face or by distance or by blending both learning modes according to need. Face-to-face learning requires student to attend two days of intensive learning monthly at designated weekends. This enables learners who have personal, family and employment commitments to attend. The subcontracted organisation's students attend class on weekdays – they also attend tutorials during the week on a voluntary basis or when directed to do so. While the time spent on self-directed learning varies, those students interviewed indicated at least 15-20 hours per week on average. Distance learning also supports learners and stakeholders in this way and uses posted or downloaded materials and DVDs (currently mainly lectures) which are updated regularly. The fact that CNHH's tutors and stakeholders are highly experienced and still current homeopathic practitioners means that all its programmes, activities and resources are regularly updated to ensure their relevance and currency. The clinical training and live or video-recorded case studies used for learning and/or assessment at year 4 are a real strength of CNHH's programmes with regard to practical knowledge and skills as well as learning to make remedies and prescribe them. Where learners' personal or family circumstances mean that they cannot attend face-to-face sessions, they are able to catch up or switch to distance on a case-by-case basis. Distance learners can also attend face-to-face intensives on an as-needs basis.

CNHH is enhancing its online delivery by introducing online learning to enhance students' learning and interactions with each other and their tutors, including one-to-one support. At the start of 2014, the PTE introduced the Moodle platform to move the organisation into an online learning environment for year 1 students in 2014 so that the 2014 cohort could benefit from online developments as they progressed through their studies – CNHH intended to roll out Moodle for years 2, 3 and 4 in January 2015 so that all new and continuing students could access Moodle for their learning. According to CNHH, both year 1 face-to-face and

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distance students had full access to the learning management system in 2014 – meaning that course notes, handouts and videoed facilitator sessions were available to all year 1 students in 2014. It was not clear that all students were taking advantage of this at the time of the EER. Student, exit, graduate and stakeholder feedback and research that is focused on distance learning has the potential to contribute to the development of not only distance learning but also face-to-face and blended learning.

1.4 How effective is the teaching?

The rating for performance in relation to this key evaluation question is **Adequate**.

The rating for capability in self-assessment for this key evaluation question is **Adequate**.

Highly qualified and experienced tutors who are also still practising natural health and homeopathy facilitate effective learning and increasingly higher programme completion rates. Evaluations completed by learners at all levels and by graduates strongly support this view, as do the evaluators' interviews with learners, graduates and stakeholders, including employers. The variable qualification completion rate appears to be the result of factors other than teacher effectiveness.

CNHH recruits and monitors new tutors according to its quality management system. However, long-term tutors are not currently appraised for their performance. Since 2013, CNHH has funded tutors to attend conferences and seminars, including events held by their own professional organisation, and visits overseas to explore new initiatives – attendees' notes are circulated to the relevant tutors. CNHH has a system of peer observation to ensure that tutors are actively engaged in a learning community, although the evaluators did not see evidence of this during the visit.

Teaching staff are collegial and share ideas and good teaching practice. Tutors have access to DVDs of lectures previously taught, which can be used for induction, appraisals and professional development as well as resources by students. They also have access to lesson plans and a shared folder of tutor information and any current or updated material is circulated to all relevant tutors. This helps support consistency of teaching quality and material throughout all venues, although a more significant factor is that often the same tutors teach at different sites at different weekends. In most regards, CNHH contract tutors are treated the same as CNHH tutor employees and contribute their experience and expertise.

The subcontracted organisation's teachers are not generally part of CNHH's community of teaching practice. CNHH does not currently directly monitor the subcontracted organisation's teacher practice, performance and professional development according to the contract and licence agreed by the two organisations, but has informally delegated this function to the organisation's senior

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teacher. Two CNHH graduates were recently appointed tutors by the subcontracted organisation and are apparently receiving support and supervision by their current senior tutor, and appropriate external adult teaching and learning training as they transition from studying to teaching. The evaluators raised concerns about particular areas relating to teacher effectiveness, such as teacher appointments and appraisal and inconsistencies with the memorandum of understanding. CNHH intends to address these matters.

Learners and graduates confirmed in evaluations and interviews that learning is highly planned and structured, learners and tutors relate effectively to one another, and CNHH practises appropriate responsiveness to the well-being and needs of learners – this includes providing an inclusive learning environment face-to-face or online, and minimising any barriers to learning. Learning is supported by well-informed, well-presented and up-to-date resources. According to the students, learning activities are generally effective in engaging learners despite quite a high proportion of delivery based on lectures, questions and discussions, particularly in the earlier stages of the programme. The four-year programme emphasises foundation knowledge and skills. These precede clinical training and the preparation of remedies with, and then without, supervision. Clinical training sessions are used live or video-recorded for further learning and assessment purposes – such activities engage the learners.

Assessment is valid and effective, sufficient and fair, at least to level 6 as far as the evaluators could determine – this was based on CNHH-commissioned external moderation, the results of which raised concerns which were largely addressed and evidenced. Assessment is transparent and provides learners with useful feedback on progress – learners can resubmit parts of assessments up to three times in areas where they are lacking, after appropriate interventions. The subcontracted organisation also conducts an end-of-year programme examination which does not contribute to the formal assessment for the diploma. The value of this assessment was unclear to the evaluators. CNHH says that it is designed as a checkpoint for students to gain confidence and assure them that they have the knowledge and skills to practise.

Internal and commissioned external moderation identifies where changes need to be made to assessment materials and/or assessment decisions. Contracted external moderation of CNHH pre-assessment materials and post-assessment decisions in 2014 up to level 6 identified matters such as incomplete requirements stated in the assessment, non-submission of marking guides, and inaccurate marking guides and reasons why assessor decisions were not verified.

When the homeopathy unit standards expired in 2008, CNHH and two other providers replaced them with very similar 'training standards' which are not subject to NZQA national external moderation. Previously, CNHH and the other two homeopathy training providers were able to provide some quality assurance around assessment when they together moderated their materials pre-assessment, and assessment decisions post-assessment. CNHH is now the only organisation using

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these standards. While tutor assessors mark all the papers they are responsible for and which align with their specific expertise, there is research which suggests that this is not a reliable means of ensuring consistent assessment. The evaluators discussed with CNHH the possibility of using Australian university moderation and verification to support the validation of assessment materials and schedules and assessment decisions at level 7 because of these universities' experience in homeopathy and natural health and learning at levels higher than level 6.

CNHH moderation of the subcontracted organisation's year 3 assignments in 2013 commented on a lack of written feedback and on assessment in the end-of-year 4 assignments being beyond what was required for assessment purposes – the evaluators did not sight evidence of whether or how these matters were addressed but CNHH subsequently assured the evaluators that changes had been made and such improvements would be documented in the future.

1.5 How well are learners guided and supported?

The rating for performance in relation to this key evaluation question is **Good**.

The rating for capability in self-assessment for this key evaluation question is **Good**.

Management, teaching staff and students all support each other in striving to attain the range of achievement and outcomes CNHH offers based on teaching, learning, supporting and achieving a high level of well-being.

Comprehensive course information is available prior to enrolling, during the interview process, and during orientation. All staff take a proactive and responsive approach to providing all students with ongoing quality guidance and support based on meeting the needs of the whole person and providing the flexibility relevant to each learner's personal and family circumstances. Having found in 2012 and 2013 that completion rates of distance students were consistently lower than attending students, from the start of 2014 CNHH allocated more staff hours to provide regular contact to all its distance learning students. Previously, CNHH likened its pastoral care process to an ambulance at the bottom of the hill, whereas now it has introduced a system of regular contact of all distance students regardless of their progress. CNHH claims that this shift from a reactive to a proactive approach has already improved student morale and that students appreciate being contacted. Typical comments are that they 'feel valued,' 'connected,' 'part of the College', and 'know what to expect so feel less overwhelmed'. As a result, CNHH is anticipating further improvement in its course completion rates. So far it has found that the risk of students dropping out has been reduced as it has been able to intercept issues at an early stage.

For attending students, CNHH has set up an extra pastoral care support process of contacting students after a weekend intensive if they do not attend or have not submitted an assignment; this is sometimes the first sign of a struggling student or

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someone with personal or family circumstances for which they may need additional support. CNHH is a signatory to the Code of Practice for the Pastoral Care of International Students over the age of 18 years and is responsible for compliance with it by both CNHH and the subcontracted organisation. CNHH has very few international students and most international students are enrolled through the contracted organisation. In practice, CNHH and the subcontracted organisation share responsibility for the guidance, support and pastoral care of international students, and the subcontracted organisation is obligated to provide pastoral care under its memorandum of understanding with CNHH.

Within the international students' orientation period, CNHH and the subcontracted organisation staff share with new students information they need to know about New Zealand (laws, driving, culture, insurances, visas). All international students have access to a 24/7 contact number. Although Code of Practice requirements and staff monitoring of over 18-year-old students is more limited than for younger students, there is a good understanding of their needs through the whānau relationships that CNHH and the subcontracted organisation practise. CNHH provides the information, handbook and resources and audits its own practices with regard to reviewing the currency of its practices and materials; it also audits the subcontracted organisation's compliance with enrolment files.

CNHH encourages students who have personal problems that might have an impact on their progress to alert the college so that it can provide additional support during this time, as appropriate and required. In providing such support, CNHH staff are aware of the importance of distinguishing between their role as an employee or contractor with CNHH and their own professional practitioner or referral role.

As mentioned, CNHH has introduced initiatives and staffing to attract and retain Māori students, with some encouraging and growing success. CNHH has trialed lectures and clinics on one marae based on how natural health and homeopathy can be consistent with indigenous practices and remedies and can add to rather than confuse or replace traditional ways. Māori who enrol with CNHH receive additional support with resources, scholarships and individual face-to-face tutoring. CNHH attributes such initiatives to increased Māori participation and retention, and early indications support this. Consistent with this proactive approach, CNHH has a memorandum of understanding with Parent Centres New Zealand to provide articles to their magazine, courses for young parents, and a scholarship.

The evaluators' student interviews confirmed CNHH's informal and anecdotal as well as formal student evaluation feedback and related documentation. The interviews also supported the evaluation team's conclusion that learners are guided and supported very well consistent with natural health and homeopathy values and effective educational and training practices. Some initiatives are relatively recent, but early indications of their effectiveness are very positive. Student representatives and a suggestion book in each classroom provide useful

opportunities for students to provide comments and suggestions for further improvements, although some students would prefer anonymity and online surveys.

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

The rating for performance in relation to this key evaluation question is **Adequate**.

The rating for capability in self-assessment for this key evaluation question is **Adequate**.

Since the Endeavour Learning Group acquired the Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy in 2008, Endeavour has provided leadership and additional funding and resources, including technology experience. The Australian-based chief executive is in regular video communication with CNHH and visits often. The combined skills and experience in academic and operational matters of the chief executive and the two CNHH general managers have the potential to be highly effective and support the leadership and management to attain the organisation's stated mission: 'We endeavour to create an empowering experience achieving excellence in teaching and learning and connecting with community'. The potential has not yet been fully realised.

All staff share a strategic vision and direction consistent with the organisation's values, as previously mentioned. The teaching staff share a common interest through their involvement in homeopathy practice, which is then embodied in the culture of the organisation. Staff, students and graduates feel valued. Current teaching staff are or have been members of the New Zealand Council of Homeopaths, and current students and graduates are encouraged to become members.

CNHH is continuously considering and implementing new initiatives, as mentioned. In addition, CNHH has been discussing with a key stakeholder the opportunity of combining its resources to provide inexpensive homeopathic treatment for the public that could also serve as a training ground for advanced students and new graduates. To accommodate this, the New Zealand Homeopathic Society has renovated its Auckland premises appropriately. These renovations were finished recently, and the venture was about to be launched and will be evaluated after the trial period.

While these and other initiatives previously referred to seem to be very sound ideas, they are not always based on robust self-assessment and some of them are too recent to know how effective they are. In some cases, the self-assessment is minimal and, while it identifies where improvements are necessary, it is insufficient to enable CNHH and the subcontracted organisation to fully understand why and what possible changes could be made. While there is some evidence of self-assessment used to understand educational performance and bring about worthwhile improvements and improved outcomes, self-assessment is of inconsistent quality and/or used inconsistently to understand educational

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performance and bring about improvements and improved outcomes. For example, achievement data, assessment and moderation, staff selection, appraisal and development are not managed effectively within CNHH and/or the subcontracted organisation and across both organisations. In addition, the student evaluations for CNHH for 2014 raise concerns which do not seem to have been identified, connected or acted on. For instance, the responses of CNHH students are clearly more positive than those of the International College of Homeopathy students, and the overall and specific summary comments reflect and support this. As such, self-assessment is not currently part of a coherent and comprehensive approach across CNHH and its subcontracted provider.

Focus Areas

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

2.1 Focus area: Governance, management and strategy

The rating in this focus area for educational performance is **Adequate**.

The rating for capability in self-assessment for this focus area is **Adequate**.

2.2 Focus area: Distance programme

The rating in this focus area for educational performance is **Adequate**.

The rating for capability in self-assessment for this focus area is **Adequate**.

2.3 Focus area: Diploma in Homeopathy (Level 7)

The rating in this focus area for educational performance is **Adequate**.

The rating for capability in self-assessment for this focus area is **Adequate**.

Recommendations

NZQA recommends that Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy:

- Further develop how it documents and processes achievement results data, ensures its statistical validity, considers what it means, identifies possible changes it could make, makes the changes and evaluates their effectiveness.
- Further develop graduate destination outcomes and stakeholder surveys and other means of obtaining feedback, and use information to make appropriate changes and improvements.
- Review and refresh teacher recruitment, appraisal, professional development and assessment and moderation practices.
- Ensure that both parties fulfil all their agreed mutual responsibilities, obligations and requirements of their joint memorandum of understanding and licence.

Appendix

Regulatory basis for external evaluation and review

External evaluation and review is conducted according to the External Evaluation and Review (EER) Rules 2013, which are 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.

Self-assessment and participation 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 NZQF Programme Approval and Accreditation Rules 2013, 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 Private Training Establishment Registration Rules 2013 require registered private training establishments to undertake self-assessment and participate in external evaluation and review, in accordance with the External Evaluation and Review Rules (EER) 2013, 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 External Evaluation and Review (EER) Rules 2013.

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 External Evaluation and Review (EER) Rules 2013 are available at <http://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/EER-Rules.pdf>, while information about the conduct and methodology for external evaluation and review can be found at <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>.

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