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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: 25 May 2017

Contents

Purpose of this Report.....	3
Introduction	3
1. TEO in context.....	3
2. Scope of external evaluation and review	4
3. Conduct of external evaluation and review.....	5
Findings	8
Recommendations	16
Appendix	17

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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)
First registered:	16 February 1998
Location:	382-386 Manukau Road, Epsom, Auckland
Delivery sites:	As above and Suite 10, 143 Durham Street, Tauranga. The Christchurch tutor works from her home in Pleasant Point, South Canterbury.
Courses currently delivered:	New Zealand Diploma in Acute Prescribing with Homeopathy (Level 5); Diploma of Homeopathy (Level 7); Diploma of Homeopathy (Animal Health) (Level 7)
Code of Practice signatory:	Yes
Number of students:	Domestic: 96; 7 per cent Māori, 3 per cent Pasifika, 11 per cent Indian, 79 per cent New Zealand European International: 19; 16 per cent on student visas
Number of staff:	Five full-time and six part-time staff and about 15 tutors on contract
Scope of active accreditation:	Domain consents to assess in Core Health, First Aid and Homeopathy to level 7

Distinctive characteristics:	The Diploma of Homeopathy (Level 7) is offered by blended learning online and on campus.
Recent significant changes:	Sale of shares to Study Group Australia Pty Ltd in April 2015. Bay of Plenty College of Homeopathy advised NZQA in June 2015 of the termination of a sub-contracting arrangement with International College of Homeopathy to teach the Diploma of Homeopathy (Level 7).
Previous quality assurance history:	At the most recent external evaluation and review (EER) CNHH was found to be Not Yet Confident in both educational performance and capability in self-assessment, making the PTE a Category 3 provider.
Other:	Further, as the result of their own internal processes, CNHH self-identified on their compliance declaration prior to the EER that they were not compliant with: NZQF Programme Approval and Accreditation Rules 2013. A complaint was made to NZQA on 5 May 2016 that international students enrolled on the basis of a face-to-face delivery model for two days a month over four years have been presented with a course approval document indicating that 17 hours face-to-face per week is now required. This complaint was investigated, closed and no further action taken.

2. Scope of external evaluation and review

The focus areas selected were all the programmes currently offered by CNHH: Diploma of Homeopathy (Level 7) and the Diploma of Homeopathy (Animal Health) (Level 7). These programmes are usually completed over four years.

Both programmes were in focus at the last EER, providing a point of comparison. The focus area of governance, management and strategy was also included.

On 5 August 2016, NZQA received the Tertiary Education Commission (TEC) report of the TEC's audit visit conducted on 30 June and 1 July 2016, two days after the EER by NZQA. These findings have been considered in the writing of this report as the issues raised were clearly signalled by CNHH prior to and at the EER.

The TEC audit report provided independent verification of the extent and magnitude of the matters raised prior/during and after the EER.

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 at the Auckland site over two days. The evaluation team met the newly constituted governance and management team: the associate director New Zealand operations/academic lead, the corporate services manager, and the governance and compliance advisor. The academic manager/chief executive of Endeavour College of Natural Health in Australia was spoken to by phone. Four tutors and a group of a dozen students, across both diplomas, were spoken to face-to-face. Subsequent to the EER, a number of graduates and external stakeholders were also contacted. A wide range of documentation was reviewed, including CNHH's self-assessment, student feedback, minutes of meetings and evidence of moderation.

The evaluators acknowledge that within CNHH a new senior management team has been put in place in response to the self-identified compliance issues, TEC funding reporting, programme structure and delivery protocols. The evaluators became aware of the commitment of the new team to address these issues. The effectiveness of this commitment will need to be tested in a subsequent EER.

Statements of confidence on educational performance and capability in self-assessment

NZQA is **Not Yet Confident** in the educational performance and **Not Yet Confident** in the capability in self-assessment of **Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy** for the following reasons:

- The validity of achievement data provided by CNHH could not be verified due to issues of non-compliance (from 2012-2015), including reporting assessments as complete on the date it sent assessment packages out to students, possibly inflating rates of course completion. This is a very serious historical non-compliance issue as course completions are a measure of performance used by the TEC to allocate funding, and are used by NZQA to make ratings about how well learners achieve. (Refer Findings 1.1.)
- Issues regarding validity of achievement data were self-identified by CNHH through the addition of new staff with increased capability in compliance and self-assessment. Findings from the internal self-assessment identified achievement data issues, which were immediately reported to the TEC before the EER visit. CNHH proactively submitted an internal action plan to the TEC, outlining changes to systems, process and self-assessment practices to avoid future non-compliance, which were immediately implemented within the college. While this is a positive step in mitigating future compliance issues, results of these improvements have yet to be seen.
- Tutors are qualified homeopaths and experienced practitioners, supportive of students and passionate about homeopathy. Most tutors have their own practices and use their active practitioner role to inform both teaching and learning. Guidance and support at CNHH is well-developed for all students and targeted to assist at-risk learners to succeed.
- In general, employers spoken with noted that graduates had good knowledge and were well-prepared for work opportunities. The issues of significant non-compliance discussed in this report have not directly affected the value of the programmes for learners. However, the resignation of two senior staff (one of whom was a popular tutor) as an outcome of non-compliances identified by CNHH may well have an impact on programmes in the future.
- The TEC noted that it was difficult to assess the teaching hours delivered in both diplomas as record-keeping was not good for either programme. The TEC identified discrepancies between NZQA approval letters outlining approved teaching hours per week and the information about teaching hours that CNHH provided to the TEC for the Diploma of Homeopathy (Animal).
- CNHH's overall capability has been increased since ownership by Study Group. It now shares some functions with the Australian head office, including

information technology, human resources and finance. Both Study Group and CNHH have cooperated fully with New Zealand government agencies around non-compliance issues and have formulated a plan to address staffing and internal processes to ensure the identified non-compliances are no longer part of CNHH practice.

- However, historical issues self-identified by CNHH which the TEC is currently investigating include unreliable achievement data and lack of sufficient evidence that CNHH's self-assessment has led to lasting improvements. That said, CNHH has demonstrated good self-assessment of the issues internally, albeit with unreliable data and the lack of time to demonstrate the success of the initiatives. For these reasons, NZQA is not yet confident in both the educational performance and capability in self-assessment of CNHH at this time.

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**.

Most learners complete courses and gain a homeopathy qualification which can be used to establish their own business or employment in a clinic environment. Table 1 shows the course completion rates for the years 2012-2015, provided by CNHH from analysis of their data. TEC course completion data is shown in brackets.

Table 1. Course completion rates 2012-2015

Course completion	2012	2013	2014	2015
All students	70% (76%)	86% (84%)	77% (81%)	82%
Diploma of Homeopathy (Level 7) (Human)	73%	91%	77%	81%
Diploma of Homeopathy (Level 7) (Animal)	64%	55%	72%	100%
Māori/Pasifika students	91%	94%	74%	66%

The CNHH course completion data aligns reasonably closely to the TEC published data. However, the issues self-reported by CNHH prior to the EER visit and confirmed by the TEC audit visit in the same week as the EER mean the reliability of both sets of data is not known.

The reasons for this are:

- Previous managers had been incorrectly reporting achievement outcomes to the TEC, stating that students had completed the programme when in fact they had not.
- Previous managers implemented processes to report assessments as complete on the date assessment packages were sent out to students. As the course completion rate is a measure of performance used by the TEC to allocate funding and is used by NZQA to make ratings about how well learners achieve, this has significant impacts for both organisations. The subsequent KPMG investigation draft report (12 September 2016) stated that this issue affected approximately 7 per cent of total courses for 2012-2015. (This comprises a

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

total of 504 incorrectly coded courses from within both diplomas, out of a possible 7,192). For example, the SDR (single data return) outcome is recorded as 2 (Complete) when the CNHH Internal Completion Code recorded 3 (Unsuccessful Completion).

- Enrolment dates reported are not accurate. Start and finish dates are not accurate. In most cases, students are enrolled for a slightly shorter period than recorded. CNHH generally uses the same enrolment dates for an intake of students, although students enrol at different times (rolling enrolments) and at different locations over the year. This means that the dates reported to the TEC may not match actual enrolment dates. However, the time taken by students to complete their study was almost always within the same year.
- Incomplete enrolment records. This included incomplete information and no enrolment dates on enrolment documents.
- Students enrolled at CNHH who were not recorded. The investigation identified six instances between 2010 and 2011 where students enrolled at CNHH who completed study were not reported to the TEC. None were identified between 2012 and 2015.
- Recognition of Prior Learning (RPL). CNHH claimed funding from the TEC for students who had been exempted due to RPL. Although some students were exempted from specific papers, CNHH claimed the full course funding as there was no disaggregation of data. This also meant that if a student failed to complete one paper within the year's course, they failed to complete the full year's course. Data was disaggregated from 2013, but the practice of claiming funding from the TEC for students who had been exempted due to RPL continued until 2015.

The CNHH audit of student files prior to the EER identified the issues above and reported these promptly to the TEC and NZQA. CNHH staff have cooperated fully with NZQA and the TEC. However, learner achievement data since 2010 is unable to be verified as accurate, for a number of reasons: the inability of the senior management team to initiate, for example, the disaggregation of data (once the implications of this error were realised in 2013); continuing to claim funding for RPL until 2015; the practice of reporting assessments as complete on the date assessment packages were sent out to students (which could inflate course completion rates); and the general lack of rigour of enrolment file maintenance.

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 **Adequate**.

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

Most learners are part-time working or part-time mature students – over 50 per cent are working and 82 per cent are between 31 and 55 years of age. Learners achieve a qualification they can use in the community for their own self-awareness or for self-employment. The 2015 graduate survey showed that 95 per cent of graduates are involved in service delivery to the community. The survey also identified the need for a bridging programme to help the transition to clinical practice. This led to a mentoring programme (2015 trial) and a business and marketing course that is now embedded in the diplomas. The Auckland clinic provides low-cost homeopathic care and free treatments at the marae and for charitable trusts in Auckland. Some students work as volunteers at the New Zealand Homeopathic Society.

CNHH has analysed a variety of data: enrolments, completions, graduate, stakeholder, Immigration New Zealand, Code of Practice, attendance, course and qualification completions, and labour market outcomes. The PTE has initiated changes to improve this data, but the longer-term impact of this initiative is not yet known. The issues discussed in this report have not directly affected the value of the programmes for learners to date. In general, employers spoken with noted that graduates had good knowledge and were well-prepared for work opportunities.

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 **Adequate**.

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

The Diploma of Homeopathy qualification allows students to be self-employed as a homeopath working in their own clinic, to work in natural health shops which sell homeopathic remedies, or work as a homeopathic dispenser within a pharmacy setting (making up the remedies for sale). The Diploma in Homeopathy is a requirement for professional industry registration with the New Zealand Homeopathic Council. Students also consistently reported increases in their confidence and well-being. Student satisfaction ratings for course content and delivery modes have been consistently high over time. Many students are self-motivated about their own and others' well-being and have experience of homeopathy prior to enrolling. The combination of online, webinars and some face-to-face delivery meets the student profile well, as do online evening 'fireside chats' with a subject

specialist. Students noted that the one weekend a month of face-to-face clinical training is very structured and thorough. Students studying the animal diploma wanted more clinical practice.

CNHH was involved in the Targeted Review of Qualifications (TRoQ), leading to four training schemes, a level 5 diploma and a three-year degree. CNHH plans to develop four training schemes and a degree. The new diploma will be integrated into the degree. The diploma will better meet students' needs by providing an exit point after one year (and a qualification) if a degree is not wanted or required. The first enrolments are planned for 2017.

1.4 How effective is the teaching?

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**.

Tutors have a range of qualifications ranging from primary, secondary, tertiary to certificates in adult teaching, as well as subject-specific qualifications. They impressed the evaluators as being well-qualified, with a good understanding of learner-centred teaching. Some tutors are ex-graduates of CNHH, indicating that CNHH values the expertise of its graduates sufficiently to employ them. A recent restructure reduced the number of part-time tutors and increased the commitment to others.

Students are positive about tutors' experience and support. They described the tutors as passionate and experienced practitioners. Most tutors have their own homeopathic practices and use their active practitioner role to inform both teaching and learning by sharing real case studies from practice clients. Feedback on assessments is written and submitted by Moodle online. A student can initiate a one-to-one meeting with a tutor if required. Students described tutors as supportive and that they encouraged students to extend themselves. These comments were evidenced through the positive outcomes of student evaluations over time.

Tutors undertake annual professional development and moderate regularly. They exchange student assessments to cross-moderate formally twice a year, to assess consistency of marking between tutors. CNHH acknowledges that moderation is an aspect that requires strengthening. However, there is a lot of ongoing, effective informal communication and support between tutors that may not be formally documented but has a moderating role when teaching and learning is discussed.

The TEC audit identified discrepancies between NZQA approval letters and the information CNHH entered into the TEC's STEO (Services for Tertiary Education Organisations) database for the Diploma of Homeopathy (Animal) for the approved teaching hours per week. NZQA approved 14 teaching hours per week, and CNHH had indicated 3.7 teaching hours per week with the remaining 10.3 hours being

called work experience hours. It was difficult to assess the teaching hours delivered in either diploma as the classes are held over two, eight-hour lectures for one weekend a month. DVD learning packs are provided to students to complete in their own time (asynchronous learning delivery). Records of learning hours received by the students were insufficient in both diploma programmes.

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 **Adequate**.

Guidance and support at CNHH is well-developed for all students and targeted to assist at-risk learners to succeed. Examples of this include the appointment of additional support staff, for example a Māori staff member appointed in 2015 to work with Māori students' technical needs and learning styles and to provide support at the beginning of their study when attrition is highest. This support includes tracking students closely, reporting attendance, and following up absences promptly. Students noted that tutors were very professional. For example, they kept personal student information in confidence, modelling the ethically appropriate relationship between a practitioner and a client.

NZQA files show that a complaint was made (by international students) to NZQA on 5 May 2016. The complaint involved international students who enrolled on the basis of a face-to-face delivery model for two days a month over four years, but were presented with a course approval document indicating that only 17 hours of face-to-face delivery was now required.

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**.

Several days prior to the EER, NZQA was notified by the CNHH governance team that they had conducted a routine audit of 13 student files on 17 June 2016 and found a significant number of TEC compliance irregularities relating to processes and funding provision. CNHH agreed to provide the TEC with a comprehensive report, having undertaken a forensic audit of all files within the college. This report would detail the overall scope of the issues, the quantum (financially) of the issues, the results of the CNHH internal investigation, response to the staffing issues, and the proposed plan moving forward regarding staffing and internal processes to

ensure these irregularities were no longer part of CNHH practice. The CNHH plan included a number of actions:

- Return of funds to the TEC
- Discussion with the TEC about a repayment plan
- Restructuring of the college
- Addressing staff legacy issues
- Engaging a new senior management team
- Submitting to the TEC/NZQA an action plan from 30 June 2016
- Inviting the TEC to audit CNHH at 1 March 2017
- Completing new programme approval post-TRoQ
- Lodging training scheme applications with NZQA to meet market needs.

On 23 June 2016 (one week before the EER visit), the general manager and academic manager both resigned as a direct outcome of non-compliance issues that the new CNHH governance team had identified. A new structure and management team was established.

On 5 August 2016, NZQA received the TEC audit report of the audit visit conducted on 30 June and 1 July 2016, two days after the EER. These findings have been considered in the writing of this report as the issues raised were clearly signalled by CNHH prior to and at the EER. The TEC audit report provided independent verification of the extent and magnitude of the matters raised prior/during and after the EER.

At the time of the EER, the academic manager and chief executive of Endeavour College of Natural Health and director of CNHH were adamant that any non-compliances and/or repayments to the New Zealand government would be honoured without question.

CNHH's overall capability has been increased since ownership by Study Group. It now shares some functions with Australian head office, including information technology, human resources and finance. There are competent staff in key management positions with extensive experience in the PTE sector, including prior management roles in high-performing organisations. CNHH has cooperated fully with New Zealand government agencies and formulated a plan to address staffing and internal processes to ensure these irregularities are no longer part of CNHH practice.

The EER was, by necessity, dominated by these compliance issues as they have direct implications for the accuracy of learner achievement data, teaching effectiveness and the competence of governance and management. The current management group has initiated practices to enable effective self-assessment to

occur once the current funding and future viability of CNHH is established. These include key performance indicator dashboards that are data-driven to enable sound analysis of student data.

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: Diploma of 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**.

2.3 Focus area: Diploma of Homeopathy (Animal Health) (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:**

- Continue to work with the TEC and NZQA to ensure it becomes and remains compliant with all relevant requirements of these organisations, particularly as regards the non-compliant areas self-identified by CNHH and others discussed in this report
- Continue to work with Study Group to ensure that the governance and management structure and capabilities of CNHH are further strengthened through shared services.

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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