



NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

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

Report of External Evaluation and Review

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

Confident in educational performance

Confident in capability in self-assessment

Date of report: 9 May 2018

Contents

Purpose of this Report.....	3
Introduction	3
1. TEO in context.....	3
2. Scope of external evaluation and review	5
3. Conduct of external evaluation and review.....	6
Summary of Results	8
Findings	9
Recommendations	16
Appendix	17

MoE Number: 8479
NZQA Reference: C27999
Date of EER visit: 6 and 7 March 2018

Final Report

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:	1998
Location:	382-386 Manukau Road, Epsom, Auckland
Delivery sites:	As above and Suite 10, 143 Durham Street, Tauranga
Courses currently delivered:	<ul style="list-style-type: none">• Diploma of Homeopathy (Level 7)• Diploma of Homeopathy (Animal Health) (Level 7)• New Zealand Diploma in Acute Prescribing with Homeopathy (Level 5)
Code of Practice signatory:	Yes
Number of students:	94 students were enrolled at the time of the on-site visit. Two of these were international students. Most of the students are studying full-time. Most students are female.
Number of staff:	Eight full-time equivalents, including two full-time tutors and a pool of part-time contract tutors.
Scope of active accreditation:	Domain consents to assess in Core Health, First Aid and Homeopathy to level 7

Distinctive characteristics: The College of Natural Health and Homeopathy describes their vision as follows: 'To promote and advance the philosophy and practice of natural medicine and wellbeing by producing high quality graduates who will go on to be leaders in their fields of practice'. The college is a wholly owned subsidiary of Study Group Australia Pty Ltd.

Programmes are currently delivered in a variety of modes: blended learning, solely online, and face-to-face.

Recent significant changes: Over the last 18 months, the college has undergone operational and academic challenges and changes. Following a restructure in late 2016, a new chief operations officer and an academic manager were appointed. CNHH has also created a new operations manual and carried out a review of all internal policies and procedures.

In early 2016, an internal audit revealed non-compliance with some Tertiary Education Commission (TEC) funding rules. The PTE was subsequently audited and required to repay \$400K to the TEC. A follow-up TEC audit in 2017 confirmed the actions taken by CNHH to strengthen their compliance processes and to mitigate risk, and enrolment restrictions were lifted.

A subcontracting arrangement with another PTE ceased in 2016. Most subcontracted students were under-25-year-old Fijian Indians.

Previous quality assurance history: NZQA was Not Yet Confident in both the educational performance and capability in self-assessment of the PTE in the previous external evaluation and review conducted in June 2016, published May 2017.

In November 2016, after the EER visit, CNHH underwent NZQA monitoring for its two level 7 diplomas. The monitoring report concluded: 'Overall, the monitoring team found that CNHH is led by a highly functioning management team with the support of committed and engaged contract

tutors who are qualified educationally and as homeopaths. Student feedback is very positive about the staff, the programmes application to employment and would recommend it to others’.

In June 2017, NZQA granted the PTE approval to deliver the New Zealand Diploma in Acute Prescribing with Homeopathy (Level 5).

Other:

Stakeholders of the college include the New Zealand Council of Homeopaths, the New Zealand Homeopathic Society, and numerous companies that produce and sell homeopathic remedies.

The college’s main campus is co-located with a group of other PTEs providing education in sport and fitness, massage, Chinese traditional medicine and acupuncture. This allows for some facilities sharing and moderation links.

The director of New Zealand operations is also president of the accrediting body for schools of homeopathy in the United States of America.

2. Scope of external evaluation and review

The focus areas selected were:

- National Diploma in Homeopathy (Level 7) and the Diploma of Homeopathy (Animal Health) (Level 7). These programmes enrol the largest number of students. The two four-year programmes are being taught out, and no new enrolments have been accepted since 2017.
- International Student Support and Wellbeing. This focus area relates to NZQA’s commitment to the responsible development and delivery of education to international students. It is essential to New Zealand’s ‘brand’ to ensure that all students are adequately supported in their programmes of study. To that end, from August 2016, NZQA introduced a standard focus area for all EERs of TEOs that enrol international students. This focus area examined how effectively the TEO under review is discharging its pastoral care responsibilities towards its international students. At the time of the EER the college had two international students.

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.*

A pre-scoping meeting was conducted at the PTE before the on-site visit. Two evaluators conducted the on-site enquiry over two days. The evaluators interviewed: the director of New Zealand operations, chief operating officer, academic manager, chair of the PTE board (also their governance and compliance advisor), student services and administration manager, pastoral and teaching staff based in both Auckland and Tauranga, and current students. Stakeholders from industry were also interviewed.

Documentation considered as part of the evaluation included a self-assessment summary and data on programmes and the volume of teaching and success rates across programmes since the previous EER. Policy and procedure documents, surveys, meeting minutes; course outlines (including NZQA approval records), curriculum material, assessment materials, website and other written guidance were also tabled.

A significant proportion of the documentation viewed was selected at random based on reference by staff to key tools and processes during the interviews or as a means to check compliance.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process: <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>. 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 fraud¹*
- *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.*

¹ NZQA and the 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.

Summary of Results

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

NZQA is **Confident** in the educational performance and **Confident** in the capability in self-assessment of **Bay of Plenty College of Homeopathy trading as College of Natural Health and Homeopathy**.

Governance and management of the college have taken numerous constructive steps to address the compliance issues first identified in 2016. Improvements in student enrolment and support processes and associated recording systems are most notable here. New, clearer and more timely monitoring provides accurate reporting to the directors and board of the PTE. Stronger controls over recognising students' prior learning and funding claims are also in place. This was previously a serious gap. These and other actions now meet the requirements of the college's main funder. Reflecting that, a new level 5 diploma has been successfully launched in 2018.

Since the previous EER, overall course pass rates have continued to exceed the 80 per cent funder target. Students have continued to complete their qualifications at consistent rates. The study progress and intentions of every student enrolled were checked in 2016, leading to the withdrawal of some students. As a result, educational achievement data is now more reliable than it was. Notably, students enrolled on the four-year diplomas have had uninterrupted teaching and support.

A high proportion of graduates find employment in areas related to their study. Given the nature of the industry and the priorities of the students, this is often self-employment and/or part-time employment. Most of the students are mature learners with previous careers and qualifications. Many also have direct experience or a keen interest in homeopathy. Student motivation to succeed is very high. The PTE could strengthen the depth of evidence of the valued outcomes.

The quality of teaching is good, and student satisfaction with course delivery and the support received was rated as 'excellent' in this evaluation. Ongoing and continuous self-assessment has led to improvements in online course delivery. Surveys of students have consistently recorded a high degree of satisfaction with the teaching, out-of-class support and associated resources.

The new managers have implemented better documented processes since their appointment in 2017. There are some areas where improvements are still being embedded. There are also opportunities to clarify some of those processes to ensure that programmes conform with approval and funder requirements into the future. No current or critical compliance concerns were noted by the evaluators.

Findings²

1.1 How well do students achieve?

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**.

Students achieve well at CNHH, with most being retained, passing their courses, and gaining a diploma (Table 1). Most of the students are mature learners with previous careers and qualifications, but many also have direct experience or a keen interest in homeopathy. These factors prepare them well for the programme. The performance of the smaller number of priority group learners is less strong. CNHH has invested in providing pastoral support and better, more timely data to improve achievement for all students. Analysis and review of student progress is now rigorous and ongoing. As a result, educational achievement data is also more reliable and better used than previously.

Table 1. CNHH course and qualification completion data 2015-2017

	2015	2016	2017*
Qualification completions – all students	81%	63%	82%
Course completions – all students	85%	87%	84%
Course completions – under-25-year-olds (number enrolled)**	66% (31)	68% (12)	69% (9)
Course completions Māori (number)	70% (12)	70% (15)	70% (20)
Course completions Pasifika (number)**	100% (36)	100% (11)	79% (4)

*Data based on educational performance indicator reports generated by the CNHH Single Data Return reporting system (Take2) using Single Data Return data (2017 results interim, to be confirmed).

**Numerous Pasifika and under-25-year-old students were enrolled under a now discontinued subcontracting arrangement.

The courses are appropriate to, and recognised by, the wider homeopathic medicines industry and local community of interest. Students learn theoretical, practical and applied skills and knowledge for appropriately supporting human and/or animal health.³ Ongoing contact by the college's staff with stakeholders and relevant research both locally and internationally supports this view of the quality of the course content and the recognition of the diplomas.

² The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

³ The college collates and shares a growing body of international evidence supporting homeopathic medicine and its benefits.

The dip in overall qualification completions in 2016 followed the identification by CNHH of non-compliance with TEC funding rules. The PTE worked with the funder to ensure more reliable data and more rigorous academic processes around recognising prior learning. Developing benchmarks against providers delivering similar types and/or levels of programmes may be useful beyond the funder benchmark currently used.

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

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**.

The value of the programmes is graduate employment and improvement in the wellbeing of people and animals. The college staff are knowledgeable about the international literature on homeopathy. Stakeholders attest to the industry relevance of the content. Over 75 per cent of graduates said in a 2015 survey that they found their qualification 'extremely relevant'.⁴ However, the PTE does not convincingly show how the programmes lead to the valued outcomes for graduates and particularly for stakeholders.

The president of the New Zealand Homeopathic Council commented on the value and importance of the diploma qualifications and said graduates were in demand by industry. Although there is no regulation requiring professional recognition by the council, she suggested that teachers of the college should be registered, and most are. Better data-sharing on graduates obtaining recognition by the council would be useful in establishing that aspect of value. This may also assist when consistency reviews of the qualifications occur.

Students have provided feedback, including to the evaluators, that they practise and apply their learning as they gain confidence, and this has had positive health benefits for them, their families and with animals. Students improve their wellbeing and that of others, at little or no cost to the government-funded health system.

Surveys conducted by the college, including a comprehensive attempt to reach all known graduates in 2015, indicate a '93% employment outcome'. This is useful, targeted self-assessment. However, given that most students were previously employed, and that numerous of the outcomes were 'part-time' homeopathic roles, more detailed data and analysis is required to establish the value of outcomes, particularly from a four-year, full-time programme.

⁴ In 2015, all 76 CNHH graduates were surveyed online or by phone. The survey found that 16 per cent of graduates were in full-time employment, and 84 per cent were in part-time employment.

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

The programme design for the focus area programmes, stretching as it does over four years, is dated and no longer fit for purpose. The PTE is aware of this and has introduced a new diploma, with others in development. No new enrolments are taken for the level 7 diplomas. As one of the few complementary medicine providers, CNHH was directly involved in the Targeted Review of Qualifications. The timing of the review played a part in delaying introduction of the new programmes. Homeopathy industry stakeholder input occurred then, and is ongoing through regular, documented industry meetings convened by the college. The programmes are currently meeting needs and are being updated.

The delivery mode (which includes or has included face-to-face, blended and fully online teaching) clearly matches student needs. Students enrol from all over New Zealand. They give regular feedback on all aspects of course delivery, and this has led to changes to improve delivery. Most notable here has been a pattern of improved use of various information technologies to support both the quality of direct teaching and the quality and availability of videos which students use for revision or self-directed learning. The students particularly value the weekend workshops and lectures which are an integrated, well-attended part of the programme. The input of subject expert guest lecturers, and the opportunity to become proficient in the hands-on aspects of homeopathy are important to the overall programme quality and relevance. Students also report benefits from learning from and interacting with their peers. These weekends take place in Auckland, Tauranga and Christchurch, reflecting ongoing investment by the PTE in meeting student needs around New Zealand.

Moderation of assessment is ongoing, well documented and involves internal and external moderators. This is important not only to ensuring the quality of assessment but also in validating students' course pass rates. Moderation planning and reporting or use has been improved, but can be further strengthened. Students receive timely, in-depth and useful feedback on their learning. Some aspects of curriculum control and alignment of actual practice with, for example, the new operations manual, can be strengthened. This was discussed during the evaluation.

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

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

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

Students say the programme is challenging, in some cases more difficult than they anticipated. They described how they manage other responsibilities with full-time study. Pastoral care follow-up has been intentionally strengthened, with a focus on any learner who has particular learning or support needs or misses assignment dates. Pastoral care also involves maintaining regular phone, face-to-face and email contact with students. The records of these contacts are used to monitor the success of interventions.

The monitoring of individual learning plans, where these are required, is also positive, suggesting that a systematic, academic-quality focus underpins student support. Interviews are held with each student by the new academic manager, ensuring students have a clear and realistic understanding of the programme and the demands of study. These are notable process improvements. The adoption and use of plagiarism controls and checks, as well as strengthened protocols around assignment re-sits, reflects review and deliberation by management and tutors. Examples of sanctions applied were sighted.

Surveys of all enrolled students have consistently recorded a high degree of satisfaction with the teaching, out-of-class support, and associated resources. There have been no formal complaints by students. One student commented that she 'feels well looked after by the college'. This reflects the strong theme of those interviewed and the comments others have made through online anonymous surveys. Students spoken to, including an international student, described the college as very responsive to any suggestion, need or criticism by students.

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

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**.

Governance and management at CNHH is increasingly effective in supporting quality educational achievement through compliance with funding and other rules. Lines of reporting, managerial capability – particularly around key compliance and quality processes – and the depth of ongoing scrutiny of academic processes have all been strengthened since the previous EER. These actions have been suitably

documented and are important to ensuring quality education as well as giving NZQA confidence in the PTE. Examples of documentation supporting this view include the continuous improvement register; records of communications by the director, who is effective in linking governance/ownership with management and operations; and the monitoring dashboard and the quality improvement plans which include tracking against important steps.

Management has spent considerable time and effort resolving compliance issues and addressing their causes. The implementation of an industry advisory group and an academic advisory group, the successful launch of a new diploma, and the hire of new managers show governance and management looking forward. The redesign of two part-time contract teaching positions to include a pastoral care component is also positive, and both roles are now full-time. These adjustments link to a documented student retention strategy.

The previous EER recommendations have been completed: documentation supports this view. The 2017 TEC audit shows compliance with TEC and/or NZQA requirements is now well managed, and governance and management structures and capabilities have been significantly strengthened.⁵ A range of report and the minutes and action points recorded and approved by management and the PTE governance. Both performance and related self-assessment are now stronger. However, the ratings for this key evaluation question and 1.6 reflect the seriousness and scale of the issues with historical TEC non-compliance, and the relatively short time that has elapsed since.

1.6 How effectively are important compliance accountabilities managed?

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 of compliance accountabilities has been a key priority, involving considerable time since the previous EER. This report has covered many of the adjustments made to rectify past issues, modify processes, and ensure future compliance. No current or critical compliance concerns were noted by the evaluators.

⁵ the TEC audit required 'an action plan to improve management and compliance with funding requirements'. This has occurred.

Compliance management includes a risk mitigation and compliance component in the leadership and governance activities.⁶ The college has also hired an external consultant with a specific focus on advising on governance and compliance. This individual has extensive experience with PTE management and TEC funding. Additional expertise, particularly around Single Data Return and TEC funding rules, comes with the new chief operations officer. The owners of the PTE (Study Group Australia PTY Ltd, who own a college in Australia teaching similar homeopathy programmes) have invested in strengthening both their oversight and local capability at CNHH.

The college has continued to deliver programmes according to NZQA approvals. In-depth consideration has been given to taught hours, directed learning and student workloads. Review of the Code⁷ has also been recorded and is suitable in coverage and staff participation at the scale of current enrolments. Oversight of teaching – which occurs from and at multiple sites and includes blended learning – is being strengthened as the new academic manager introduces a new, more critical view on quality. Staff hold qualifications appropriate to the subjects they teach.

The underpinning academic quality processes at CNHH are being reinvigorated, and the documentation supporting and communicating changes and improvements is available to and used by staff.

⁶ For example, as recorded in Quality Area 3 of the PTE's quality improvement plan, and in communications between the CNHH board and the owner group.

⁷ Education (Pastoral Care of International Students) Code of Practice.

Focus Areas

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

2.1 Focus areas: Diploma of Homeopathy (Level 7) and Diploma of Homeopathy (Animal Health) (Level 7)

The rating in these focus areas for educational performance is **Good**.

The rating for capability in self-assessment for these focus areas is **Good**.

2.2 Focus area: International Student Support and Wellbeing

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

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

Recommendations

NZQA recommends that CNHH:

- Consider developing benchmarks against providers delivering similar types and/or levels of programmes, delivered in similar blended mode.
- Consider ways in which the value of outcomes for students and stakeholders can be more convincingly established given the 'value proposition' from which the college operates with reference to the college's stated vision.
- Continue aligning the quality management system, operations manual and day-to-day practice.
- Strengthen document control, and introduce a more centralised programme document as new programmes are introduced.
- Continue to prioritise the staff development actions recorded in the improvement plan. In particular, ensure that all staff are involved with and understand the key self-assessment tools in use and how they relate to the curriculum and the wider organisational goals and responsibilities. Having a more formalised annual programme review process would be one approach.

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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz