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External Evaluation and Review Report

Safety Hub Limited

Date of report: 26 February 2021

About Safety Hub Limited

Safety Hub Limited is a new private training organisation providing online health and safety short courses for the health and safety representative in the workplace, with assessment towards unit standard 29315.¹

Type of organisation:	Private training establishment (PTE)
Location:	35 Spur Grove, Porirua, Wellington
Code of Practice signatory:	Not applicable
Number of students:	Domestic: 2019, five students; 2020, four students
Number of staff:	Two part-time
TEO profile:	See the NZQA Safety Hub Limited page
Last EER outcome:	This is the first external evaluation and review since Safety Hub gained NZQA registration as a PTE in 2017.
Scope of this evaluation:	<ul style="list-style-type: none">• Certified Health and Safety Representative (Training Scheme)• Governance and management
MoE number:	9152
NZQA reference:	C43514
Dates of EER visit:	1 and 2 December 2020

¹ Unit standard 29315: Describe the role and functions of the Health and Safety Representative in a New Zealand workplace.

Summary of results

Safety Hub Limited has developed a fully online training scheme which has clear value and a high rate of achievement. The PTE's self-assessment has limited effectiveness, and management needs to develop appropriate policies for managing educational activities.

Confident in educational performance

- All enrolled students have successfully achieved the standard 29315. Student feedback attests to a growth in skills and knowledge. Māori and Pasifika achievement is not identified and reported.
- The value of the training scheme is derived from the legislative requirement to hold unit standard 29315. Feedback has only been sought from recent graduates. Data regarding the extent to which skills, knowledge and attributes (transferable skills) have been applied within the workplace has not been sought.

Not Yet Confident in capability in self-assessment

- The programme was designed to be delivered solely online. This allows for close monitoring of student engagement and the approved hours of learning. Relevance and currency are provided through regular engagement with related industry bodies, ensuring the training scheme remains current. The PTE does not regularly check for updates to the unit standard, although the developed material is consistent with the current version of the standard. The PTE does not have a policy for internal pre- and post-assessment moderation procedures.
- Students are well informed prior to and during enrolment to ensure expectations and requirements of study are met. Prompt support is provided through direct contact with the trainer or digital support person. A collaborative forum has also been set up for students and graduates to establish further support networks, although to date this has not been used. Policies for the support of persons with learning difficulties and completion issues are

still to be developed.

- As a small, family-run organisation, the PTE's purpose and direction is fully understood. The annual review of the strategic plan reflects the current focus on developing the training; however, policies and procedures are in place to enable sustained growth. Regular informal meetings ensure management is aware of and discusses activities and feedback received.
- A schedule for managing accountabilities is used, and recent adjustments are appropriate to enable the organisation to meet NZQA requirements and act legally and ethically.

Key evaluation question findings²

1.1 How well do students³ achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Although it was registered as a PTE at the end of 2017, Safety Hub only began delivery of the training scheme³ in 2019. At the time of the EER, nine students had enrolled during 2019 and 2020; of these, seven have completed the training scheme and associated unit standard.⁴ To date, student achievement is 100 per cent.</p> <p>Demographic data for the students is not identified, so the achievement rates of Māori, Pasifika or under 25-year-olds are unknown. Future collection of this information would strengthen self-assessment around stakeholder needs and programme relevance.</p> <p>Each graduate is requested to provide feedback about their growth of skills and knowledge as a health and safety representative during the period of their training. A small number of graduates responded to the formal survey (two of seven), but further feedback has been received via emails and phone conversations. All responses have been positive. Feedback has not been sought regarding the growth or use of skills such as communication, advocacy and leadership. This would strengthen self-assessment.</p>
Conclusion:	<p>To date, students have successfully achieved the unit standard to become certified health and safety representatives. Feedback about the growth of skills and knowledge during training is positive. Collecting additional information about demographics would further strengthen self-assessment.</p>

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 name of the training scheme is Certified Health and Safety Representative and it contains the unit standard 29315 required under the Health and Safety at Work Act 2015.

⁴ The remaining two are still training and appear to be on track to complete successfully.

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>The unit standard delivered by this provider's training scheme is a legislated requirement for any persons who want to become a workplace health and safety representative. This is the valued outcome for stakeholders.</p> <p>All students who undertake the training are already employed and complete the programme to gain the aforementioned extra health and safety responsibility in the workplace. Graduates anecdotally attest to this occurring. A formalised method of gathering information about the use of these acquired skills, knowledge and attributes from graduates and employers would strengthen self-assessment for outcomes value and programme review.</p> <p>The trainer is a member of a number of industry bodies, including the New Zealand Institute of Safety Management. This allows Safety Hub to contribute to the industry community to whom they have targeted their training scheme.</p>
Conclusion:	<p>The value for all stakeholders is understood and training is designed to ensure this outcome. Feedback is limited as it is gained from recent graduates only and focusses on delivery of the programme rather than the use of learnt skills and knowledge in the workplace. Mechanisms to understand the value to employers would also be useful.</p>

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>The clear outline of outcomes and performance criteria provided by the unit standard has enabled Safety Hub to develop a series of aligned online activities and assessments. The online platform can be used to monitor student engagement, meeting the approved hours of learning.</p> <p>Assessments occur at the end of each module, aligned with the unit standard outcomes. Students are able to resit⁵ as many times as they need to show competency and answer every question correctly. Providing further learning support after a given number of failed attempts would ensure emerging student needs could be addressed as well as strengthening academic standards and integrity.</p> <p>Input into currency and programme relevance is obtained through regular engagement with industry bodies and, to a lesser degree, through engagement with other stakeholders. Formal review of the training scheme is scheduled to occur annually and should include a check of current versions. However, the regular engagement with industry and regular testing of the online system allows for proactive action when changes are needed. Analysis of the assessment experience feedback from students and the trainer would strengthen the review process.</p> <p>Moderation of the assessments for the training scheme had not occurred at the time of the EER. Pre-assessment moderation, as outlined in NZQA moderation requirements (CMR 121), was not completed by the standard-setting body at the time of the EER visit, but retrospective assessment moderation has now been completed and approved for use. National external post-moderation of assessment with the standard-setting body has</p>

⁵ For three of the five learning components, assessments are in the form of five multi-choice questions. If all are not answered correctly, a resit is required. For the resit, a student will receive the same questions but in a different order

	not occurred because of low student numbers. However, Safety Hub has not undertaken the recommended alternative ⁶ of gaining an external partner to enable internal post-assessment moderation (of the written submissions).
Conclusion:	The training scheme programme has been developed to align with the 29315 unit standard requirements, allowing for a clear definition of tasks for easy monitoring of hours and review. The lack of internal post-assessment moderation reduces confidence in the consistency, fairness and appropriateness of the written assessment tasks.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>As mentioned in key evaluation question 1.2, learners undertake the training as required by legislation, and because they may want additional health and safety responsibility in the workplace. Prospective students can gain comprehensive information about the programme from the PTE's website. Once enrolled, this information is reiterated in a welcome email. Gaining information about cultural backgrounds and previous learning experience at the time of enrolment would enable the provider to ensure the learning environment is inclusive.</p> <p>Subject-related and digital support is available to students when required via an email to the relevant staff member at Safety Hub. Feedback regarding this has been positive, particularly with regards to the timeliness of response. A collaborative forum space is available to students and graduates who wish to engage with each other as well. To date, this facility has not been used. Safety Hub could help students to build effective networks and increase their knowledge and relationships in the health and safety sector by requiring use of the forum as part of the course.</p> <p>Progress through the course is monitored through completion of each module's assessment. There are no policies and procedures for identifying and supporting people who have</p>

⁶ NZQA Validation Visit Report for Safety Hub Limited, 9 December 2019

	<p>become inactive, have multiple attempts at assessment, or self-declare learning difficulties.</p> <p>Continued support for a year is available after students complete the unit standard. This facility has not been used.</p>
Conclusion:	<p>Students are well informed prior to and during enrolment. Training and digital support is readily accessible, and a forum space has been created as a facility for future engagement and networking between students and graduates. The review of these current support facilities and those around minimising learning barriers is still to occur.</p>

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Safety Hub is currently a small, family-run education organisation with a very clear purpose and direction. The size of the organisation and the flat organisational structure means multiple roles and tasks are undertaken by all staff. Policies and procedures are in place if expansion occurs.</p> <p>Low student numbers since delivery commenced, information provided through the annual returns to NZQA, and the challenges raised by the Covid-19 pandemic do not give confidence about the sustainability of this organisation. However, regular informal and at least one annual official meeting enables the organisation to discuss matters that arise from feedback received, sector challenges and regulation requirements. Also, the strategic plan is annually reviewed. This has created the current focus on increasing the number of programmes offered and the marketing of the education products. This may increase the sustainability of the business model and the amount of data available for analysis and use to direct effective review.</p> <p>The current staff can access the training to be more effective in their roles. However, the trainer has not completed all of the professional development in adult education as recommended</p>

	during the initial NZQA validation visit. Completion of this training, particularly unit standard 11551 ⁷ , would benefit the learners.
Conclusion:	Safety Hub is a small organisation with a clear purpose and direction. Annual review of the strategic plan enables the organisation to respond and redirect its activity to grow its sustainability and self-assessment practices. Staff are developed to enable them to fulfil the roles they hold within the organisation; however, recommended professional development has not been completed.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>A schedule for management of compliance accountabilities is in place. As a new organisation, this PTE did not have the capability to manage all the important compliance accountabilities and looked to the operation of other training organisations for guidance.</p> <p>An existing quality management system (QMS) document was adjusted to reflect the policies and procedures followed by Safety Hub. Safety Hub management recognises that the current QMS requires further adjustment to make it fit for purpose, and this is still to be completed. Inclusion of procedures for the conduct of internal assessment moderation and adding external moderation processes to the compliance table would benefit the organisation.</p> <p>In complying with the relevant legislation, rules and regulations, the following inconsistencies were noted:</p> <ul style="list-style-type: none"> • Only two of the seven completed unit standards were reported within the 90-day reporting requirement. Safety Hub has changed its reporting cycle from quarterly to monthly to rectify this. • The Safety Hub website ambiguously claimed expertise and activity that could not be attributed to the education provider,

⁷ Unit standard 11551: Quality assure assessment

	<p>which potentially could have misled prospective students and other stakeholders. The ambiguity was rectified by Safety Hub within 24 hours of the EER evaluators informing the PTE.</p> <ul style="list-style-type: none"> • The self-developed assessment material had not been pre-assessment moderated prior to use by the relevant standard-setting body as required by CMR 121 moderation requirements. However, this has been completed since the end of the EER enquiry.
<p>Conclusion:</p>	<p>Safety Hub has a schedule for the management of its compliance accountabilities. Some inconsistencies were noted within this provider's compliance with relevant legislation, rules and regulations. Management was able to start rectifying most of them quickly.</p>

Focus areas

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

2.1 Focus area: Certified Health and Safety Representative (Training Scheme)

Performance:	Good
Self-assessment:	Marginal

2.2 Focus area: Governance and management

Performance:	Good
Self-assessment:	Marginal
Conclusion	The organisation has a clear purpose and direction. However, more knowledge and ongoing oversight of rules and requirements by management is needed. Feedback received is limited and focussed on course delivery. Active, documented collection of information and data about and from all students ⁸ and employers for use in self-assessment needs attention. This could provide insight into processes that may assist in sustainable practices for future growth.

⁸ Currently, Safety Hub has delivered courses to nine students. It is reasonable to expect the PTE to know how all students are doing.

Recommendations

Recommendations are not compulsory but their implementation may improve the quality and effectiveness of the training and education provided by the tertiary education organisation (TEO). They may be referred to in subsequent external evaluation and reviews (EERs) to gauge the effectiveness of the TEO's quality improvements over time.

NZQA recommends that Safety Hub Limited:

- Expand feedback sought to gather information and data regarding how skills, knowledge and attributes gained are used in the workplace, from both the graduate and the employer perspective. This will provide information leading to a greater understanding of value and assist in programme review.
- Seek to identify Māori and Pasifika students at enrolment and disaggregate the achievement information of these students to identify potential needs and ensure the learning environment is inclusive.
- Ensure pre-assessment moderation is completed by the relevant standard-setting body before the assessment materials are used for the first time, in accordance with the relevant CMR.
- Develop processes for completing regular internal post-assessment moderation activity to inform programme review.
- Add to the current student support policy and procedures to address the support needs of learners:
 - with learning difficulties
 - who have become inactive during study
 - who have assessment completion concerns.
- Identify touch points such as a given number of resits, which could provide a signal for additional support.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. These include NZQA Rules and relevant regulations promulgated by other agencies.

There are no requirements arising from this external evaluation and review.

Appendix

Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

For the same reason, these findings are always limited in scope. They are derived from selections and samples evaluated at a point in time. The supporting methodology is not designed to:

- *Identify organisational fraud⁹*
- *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.*

⁹ NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.

Self-assessment and participation and cooperation in external evaluation and review are requirements for:

- *maintaining accreditation to provide an approved programme for all TEOs other than universities, and*
- *maintaining consent to assess against standards on the Directory of Assessment Standards for all TEOs including ITOs but excluding universities, and*
- *maintaining training scheme approval for all TEOs other than universities.*

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.

In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes, training schemes and consents to assess and registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016. The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

External evaluation and review reports are one contributing piece of information in determining future funding decisions where the organisation is a funded TEO subject to an investment plan agreed with the Tertiary Education Commission.

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz). All rules cited above are available at <https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/>, while information about the conduct and methodology for external evaluation and review can be found at <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>.

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