



NEW ZEALAND **QUALIFICATIONS** AUTHORITY  
MANA TOHU MĀTAURANGA O AOTEAROA

---

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

# External Evaluation and Review Report

Acupuncture Associates Limited trading  
as New Zealand School of Acupuncture  
and Traditional Chinese Medicine

Date of report: 28 August 2019

# About Acupuncture Associates Limited trading as New Zealand School of Acupuncture and Traditional Chinese Medicine (NZSATCM)

---

*NZSATCM provides specialised qualifications and training in acupuncture and traditional Chinese medicine in New Zealand.*

---

Type of organisation:	Private training establishment (PTE)
Location:	382C Manukau Road, Auckland Level 10/57 Willis Street, Wellington
Code of Practice signatory:	Yes
Number of students:	Domestic: 118 – eight Māori, three Pasifika International: eight
Number of staff:	Two full-time directors, a full-time head of department for undergraduate programmes, a full-time head of department for postgraduate programmes, three full-time teaching staff and part-time contract staff
TEO profile:	See: <a href="#">NZQA – Acupuncture Associates Limited</a>
Last EER outcome:	In 2015, NZQA was Highly Confident in the PTE’s educational performance and Confident in its capability in self-assessment.
Scope of evaluation:	<ul style="list-style-type: none"><li>• Bachelor of Health Science (Acupuncture) (Level 7), delivered concurrently with the Diploma of Tuina and the Diploma of Chinese Herbal Medicine.</li><li>• International Students: Support and Wellbeing</li></ul>
MoE number:	9670
NZQA reference:	C33842
Dates of EER visit:	16 and 17 October 2018

# Summary of Results

---

*NZSATCM provides diploma and degree-level programmes that promote Chinese medicine in a contemporary setting. Graduates have the required skills and competencies to work in the community or their own practices.*

---

## **Confident in educational performance**

- Learners are motivated and supported to complete courses. The average successful completion rate for all programmes delivered by NZSATCM for 2015-2017 was 91 per cent.
- Students gain practical experience in clinics which they are able to integrate with theoretical knowledge.
- Graduates are mostly successfully self-employed or work with other health professionals in a clinical setting.

## **Not Yet Confident in capability in self-assessment**

- Staff have extensive and relevant industry experience. Most staff continue with their professional practices, informing their teaching.
- NZSATCM has a clear strategic vision. However, oversight of the Wellington campus and its operations by head office in Auckland has been ineffective due to poor communication and management processes.
- NZSATCM is not managing all of its ongoing compliance responsibilities in a proactive manner to meet government requirements.
- Many recent changes, including new ownership, ongoing poor communication between teaching sites, and upheld student complaints at the Wellington site indicate that self-assessment is not sufficiently purposeful for NZQA to be confident in NZSATCM at this time.

# Key evaluation question findings<sup>1</sup>

## 1.1 How well do students achieve?

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>The average successful completion rate for all programmes delivered by NZSATCM for 2015-2017 was 91 per cent. New management detected a reporting issue to the Tertiary Education Commission (TEC), showing higher completion rates. These rates have now been agreed and corrected. NZSATCM also identified over-delivery to domestic students over several years. NZSATCM requested and was granted extra funding by the TEC in 2018.</p> <p>NZSATCM monitors successful course completion by programme and at each campus. In 2018 there were insufficient numbers for year one of the Bachelor of Health Science (Acupuncture) programme to run at the Wellington campus. In 2018 there were no new enrolments in the Master of Health Science (Chinese Medicine). These two issues are under close management scrutiny.</p> <p>Moderation has improved by contracting an experienced overseas moderator to conduct external moderation. Internal moderations processes are effective.</p> <p>The impact of inaccurate, although unintentional, reporting to the TEC and lost external moderation samples has been mitigated by improvements to databases and closer monitoring of performance across campuses. There were no issues identified with the quality of the teachers or teaching delivery.</p>
Conclusion:	NZSATCM has maintained high average course completion rates. However, continuing and enhancing internal and external moderation would increase confidence in the validity of future achievement data.

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

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

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Students participate in private and community clinics to meet the requirement of 500 patient hours over the four-year degree. Clinical practice opportunities are diverse, including at correctional facilities and maternity services. Clinical experience is supervised and used to consolidate students' theoretical classroom learning and to impart awareness and knowledge about acupuncture and its applications in the community.</p> <p>Graduates achieve a qualification that can be used to establish their own practice or to work with other health practitioners. Graduate destination data is collected through email, word of mouth and phone calls. Between 2015 and 2018, these responses indicated that the majority of graduates were working as traditional Chinese medicine (TCM) practitioners.</p> <p>Since 2016, the proportion of graduates applying for Acupuncture NZ practising certificates has increased from 64 to over 80 per cent. Benefits include ACC registration and belonging to a national professional body.</p> <p>Graduates speak with students about their work experiences, but it could be useful to gather further evidence to understand graduates' experiences and use of the skills gained. This information could be used to further inform programme review.</p>
Conclusion:	<p>TCM is increasingly being recognised as a beneficial therapy. The new management has taken a proactive approach to ensure programmes are actively marketed and that students have beneficial outcomes that reflect TCM philosophy and principles. More systematic stakeholder feedback would inform valued outcomes more clearly.</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:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Extensive programme review has occurred since 2016, assuring NZSATCM that programmes are now fit for purpose. IT upgrades and improved Wi-Fi have increased the usability of data and the student experience.</p> <p>Staff have extensive clinical experience and are current practitioners. Recent new staff appointments have added value to the teaching team. Staff are expected to gain an adult teaching qualification within two years of appointment and to have 20 hours of professional development to meet the annual practice certification. Professional development offered at both campuses has contributed to staff engagement and improved learner outcomes. Feedback to students from assessments is comprehensive.</p> <p>Programme materials are interactive and relevant, and students are confident to approach teachers with questions and clarifications. Facilities and resources support teaching and learning; however, changes to the library and the usability of the computer room were a concern to students at the time of the EER.</p> <p>A more systematic approach to structuring and capturing feedback from a range of stakeholders, particularly clinic clients, would strengthen the evidence of NZSATCM matching needs and delivering value for graduates and clients.</p>
Conclusion:	<p>Graduates gain confidence in interfacing with other medical approaches as they progress through their study. A period of extensive programme review now needs to be consolidated by ongoing, systematic self-assessment to evaluate the effectiveness of changes made.</p>

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

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Students understand learning goals, have opportunities to apply their knowledge and skills in clinical practice hours, and are provided with useful and timely feedback on their progress. New staff are still settling into their roles and some programme materials are in urgent need of upgrading.</p> <p>Student pathways are being reconsidered because of the financial feasibility of some programmes, such as the Master of Health Science (Chinese Medicine) which is currently delivered part-time over three years. Some students did not complete their research thesis but exited to a postgraduate certificate. Others found the study period too long and did not complete as their circumstances changed.</p> <p>Upgrades to support the Master's programme online delivery have been successful, according to feedback gathered in 2017 regarding content, workload, assessment, teacher knowledge and engagement with students.</p> <p>International student numbers are low. These students enjoy studying with domestic students as it causes them to reflect on the interfaces between TCM and western medicine. It also allows them to observe domestic students as these students learn about a medical model with which international students are very familiar. This provided interesting learning opportunities for both groups of students.</p> <p>Greater interaction with former graduates, particularly around the challenges of self-employment, would be beneficial prior to graduation.</p>
Conclusion:	Students are well supported at NZSATCM. Involvement in learning is good and students are confident that teaching and support staff are available to assist them when needed. Student representatives have been effective, with student feedback leading to improvements at the Auckland campus in particular.

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

Performance:	<b>Marginal</b>
Self-assessment:	<b>Poor</b>
Findings and supporting evidence:	<p>The new management has taken time to understand the business and scope areas for improvement. This has included providing support for staff and students, reviewing curriculum documents and updating business and student management systems, introducing a patient management system for teaching at clinics, improved accounting software, staff support to do further study, and a journal club for staff with research responsibilities.</p> <p>Management has also dealt with staff and student complaints, appointed and inducted new staff, and restructured the organisation. While teaching and learning has always been well understood and effective, staff conditions of employment were not always comparable and equitable. Standardising these processes has led to some tensions and staff resignations. In addition, recent student complaints at the Wellington campus were upheld by an NZQA risk investigation. While resolved, this was only after NZQA intervention, indicating a reactive culture of governance and management.</p> <p>The directors have also been involved with international collaborations and student exchanges with TCM universities in China. Appropriate memorandums of understanding were sighted for these arrangements. An external advisory committee advises on academic matters and at-risk students are now more actively managed.</p> <p>Close monitoring by the TEC and NZQA has led to changes. For example, the NZQA monitor's report recommended a one-resit policy (compared with two resits previously). The maximum credit allowance for recognition of prior learning was limited to 50 per cent, with no recognition for the Bachelor's programme. All recommendations from the NZQA monitor's report were actioned by NZSATCM.</p>
Conclusion:	NZSATCM needs to reflect on its management of complaints, consolidate effective changes made, and involve staff in systematic self-assessment activities across the organisation. This focus will contribute to the development of processes that

	will assist governance and management to better support educational achievement.
--	--

## 1.6 How effectively are important compliance accountabilities managed?

Performance:	<b>Marginal</b>
Self-assessment:	<b>Poor</b>
Findings and supporting evidence:	<p>One director is responsible for finance/operations and the other for academic and business developments in China. Staff are updated on issues at weekly management and staff meetings. The management team includes all heads of department. Communication between the Wellington and Auckland campuses has improved. However, recent safety issues at the Wellington campus required NZQA to direct NZSATCM management to find alternative short-term premises for students that complied with NZQA rules and legislation around health and safety in the workplace.</p> <p>The TEC final desktop audit report for 2018 found 70 per cent compliance with requirements and 30 per cent improvement required (Pass, Low Risk). The previous audit in 2017 had a Fail, High Risk outcome. The pass status validates the range of improvements the directors have initiated since purchase. The key findings and recommendations from the 2018 report were that overall systems, practices and processes are acceptable. Minor issues were identified which will need to be resolved and monitored. The issues identified by the TEC are:</p> <ul style="list-style-type: none"> <li>• There is no documentation to support student withdrawals. Student withdrawals will need to be sufficiently documented going forward – to be actioned by January 2019</li> <li>• Data held in the Services for Tertiary Education Organisations' (STEO) website relating to fees is different from the fees being charged to students. NZSATCM will need to update STEO to reflect the fees being charged to students – to be actioned by 31 October 2018</li> <li>• Record-keeping processes are not documented. NZSATCM will need to document record-keeping process and procedures – to be actioned by 31 October 2018.</li> </ul>

Conclusion:	The diligence undertaken since purchase has improved policies and practices. NZSATCM has now actioned the above TEC requirements. However, overall compliance management was insufficiently rigorous to identify issues at the Wellington campus prior to student complaints to NZQA. While these issues are now resolved, they indicate poor self-assessment practices.
-------------	--

# Focus Areas

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

## 2.1 Focus area: Bachelor of Health Science (Acupuncture) (Level 7)

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Course completion rates for the Bachelor of Health Science (Acupuncture) for 2015-2017 for the Wellington campus were 94 per cent, 98 per cent and 89 per cent; and for the Auckland campus for 2015-2017 were 92 per cent, 97 per cent and 85 per cent. Consistent achievement across the programme and campuses indicates that learners are achieving their learning goals well.</p> <p>The NZQA monitor's report for the Diploma of Tuina (May 2017) found that the curriculum required urgent review, all teaching staff needed support to gain a tertiary teaching qualification, and the advisory committee needed a more diverse membership. Effective actions have been taken to address these recommendations.</p> <p>The NZQA monitor's reports for the Diploma of Chinese Herbal Medicine (May 2017) had the same recommendations as for the Diploma of Tuina, plus the need to identify an external moderator to moderate years one and three of the Diploma of Chinese Herbal Medicine and to reduce the number of resits allowed. The recommendations from the report were confirmed as accurate by NZSATCM in July 2017. Effective actions have been taken to address these recommendations.</p> <p>The 2018 monitor's report for the Bachelor of Health Science (Acupuncture) concluded that the programme was being delivered in line with NZQA approval and accreditation requirements.</p>
Conclusion:	NZSATCM has engaged with the TEC and NZQA and responded appropriately to their recommendations to ensure that the programmes offered are compliant and relevant to the students.

## 2.2 Focus area: International students

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>The evaluators sampled all eight international student files and found them to be compliant. The Code of Practice review document addressed all the outcomes of the Code and explained how effectively these were being managed.</p> <p>Students interviewed were well supported and satisfied by the pastoral care offered at NZSATCM. International student achievement is on a par with domestic student performance. However, due to low international student numbers, the significance of this finding is uncertain.</p>
Conclusion:	<p>International student support is fit for purpose and meets all requirements. Achievement rates are good and similar to all students. More emphasis on the 'Kiwi experience' and Māori tikanga would enrich the learning experience for these students. An English-only rule in class time would also be useful.</p>

# 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 Acupuncture Associates Limited trading as New Zealand School of Acupuncture and Traditional Chinese Medicine consider:

- Ways to ensure more effective communication across teaching campuses
- Ways to improve the management of compliance issues, including physical and pastoral care obligations to students and staff
- Ways to customise the learning environment to acknowledge the New Zealand context.
- Develop a buddy system between international and domestic students to support, encourage and maximise shared learning opportunities across cultures
- An in-class English-only policy to reduce barriers to learning
- Students' issues with pre-clinic preparation for working with the public for the first time
- The Moodle platform's capability to enable students to access end-of-year results
- Upgrading the computer room and library access and resources to increase usability for students.

# Requirements

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

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

# Appendix

## Conduct of external evaluation and review

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

### 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 fraud<sup>2</sup>*
- *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.*

---

<sup>2</sup> 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.

## 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](http://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](mailto:qaadmin@nzqa.govt.nz)

[www.nzqa.govt.nz](http://www.nzqa.govt.nz)