



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: 14 August 2023

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:	382 Manukau Rd, Epsom, Auckland
Code of Practice signatory:	Yes
Number of students:	Domestic: 62 10 students are seven NZ European/Pakeha, three Māori, 36 Chinese, 13 Korean, two Other Asian, one Pasifika International: six
Number of staff:	Seven full-time, 12 part-time
TEO profile:	See Acupuncture Associates Limited on the NZQA website
Last EER outcome:	The previous external evaluation and review (EER) of NZSATCM, held in October 2018, resulted in summative judgements of Confident in educational performance and Not Yet Confident in capability in self-assessment.
Scope of evaluation:	<ul style="list-style-type: none">• Bachelor of Health Science (Acupuncture) (Level 7).• International Students: Support and Wellbeing
MoE number:	9670
NZQA reference:	C45384
Dates of EER visit:	11 and 12 May 2021

Summary of results

This is NZSATCM's second consecutive unsatisfactory EER. Despite several remedial initiatives, including closure of the Wellington campus, performance is still inconsistent. NZQA acknowledges NZSATCM's high qualification completion rate, but organisational performance is handicapped by limited evidence of graduate outcomes, and variable self-assessment.

- | | |
|---|--|
| Not Yet Confident in educational performance | <ul style="list-style-type: none">• NZSATCM has reported high course and qualification completions; however, limited evidence of graduate outcomes makes it difficult to assess the overall value of the programmes.• NZSATCM's connections and relationships with the relevant stakeholder sectors have been ad hoc, limiting its ability to develop and deliver programmes that match stakeholder needs. Stakeholder engagement has strengthened in the past few months, as NZSATCM has developed a new Bachelor of Health Science degree. |
| Not Yet Confident in capability in self-assessment | <ul style="list-style-type: none">• Students are engaged in their learning and experience a supportive learning environment.• Courses are taught by staff who are qualified and experienced in their respective professions and use their experience to ensure the education delivery is relevant. A greater emphasis on teacher training is needed.• The organisation has responded to substantial changes in the past year. Activities are now well resourced. However, some improvements and initiatives reported as completed in response to the last EER have not been maintained.• In the past two years, some academic self-assessment activity has been strengthened but is not fully embedded in the organisation. There is limited evidence that future self-assessment will continue to guide and inform improvements. |

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>NZSATCM data shows that most students stay on their programmes and pass their qualifications. Course and qualification completion rates have consistently been above 80 per cent over the past two years for the programme in focus in this EER – refer Appendix 1.</p> <p>Clinical practice undertaken by students on site at NZSATCM, especially in the latter half of the degree, provides opportunities for students to practise their professional skills and knowledge under supervision. They also gain meaningful interaction with clients and acquire valuable ‘soft skills’ such as professionalism, collaboration and customer service.</p> <p>NZSATCM does not have systems in place for regularly monitoring incremental achievement to enable the teaching to be tailored accordingly. Monitoring student achievement on a week-by-week basis is largely informal. Structured teacher meetings, where individual student progress is formally discussed, have not taken place since some time in 2020. It is likely, therefore, that student success is the result of individual student and/or staff effort rather than methodical processes by NZSATCM.</p>
Conclusion:	Students are retained in study and show good progress in their degree study. Systems for thoroughly understanding and using achievement data to bring about improvements are evolving.

¹ 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:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>Anecdotal evidence suggests that some students at NZSATCM are gaining good value from their study by achieving their academic and personal goals. Some graduates have gone on to establish themselves in their own acupuncture practices. Registration with Acupuncture New Zealand² is viewed by the PTE as an important measure of successful graduate outcomes. During the EER NZSATCM was unable to specify the actual number of graduates who had registered with Acupuncture New Zealand, which limited subsequent discussion and analysis of the value of graduate outcomes. However, post EER, after making contact with Acupuncture New Zealand, NZSATCM reported that that 37 of 53 graduates (69.8 per cent) from 2018 to 2020, had become professional members of Acupuncture New Zealand.</p> <p>NZSATCM has informal and anecdotal information about some graduates but, in general, knowledge of outcomes is limited. Although efforts have been stepped up recently, they began with an over-reliance on survey tools when, with the current small numbers of graduates, individual graduates could be contacted and debriefed with ease. This was the case with the six graduates who were contacted in the fortnight prior to this EER. While it is positive that the focus has been on building comprehensive survey systems, opportunities have been missed to use quick turnaround qualitative tools and rich conversations to ascertain graduate value.</p> <p>In July 2021, NZSATCM surveyed graduates, receiving 32 responses (60 per cent), who were employed or self-employed in an acupuncture role. This demonstrated the beneficial outcomes of the programme and helped the school to review the effectiveness of its delivery.</p> <p>While NZSATCM gathers some exit data from students when they complete their programmes, there is little meaningful engagement with employers and graduates to help determine the long-term value of the programmes. This matter was raised</p>

² Acupuncture New Zealand is the largest professional body representing practitioners of acupuncture and Chinese medicine in New Zealand.

	in the 2019 EER, and recommendations to improve the understanding of graduate outcomes was also made by NZQA in three separate programme monitoring reports since 2018.
Conclusion:	Limited evidence of graduate outcomes makes it difficult to assess the overall value of the programmes at NZSATCM.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>NZSATCM has improved its mechanisms to gather and listen to feedback from students through a variety of sources. As well as the formal student feedback process, staff have an open-door policy, and it is clear that students approach them with problems and issues. Staff were able to demonstrate examples of how course content and delivery methodology had been changed as a result of feedback from students.</p> <p>Internal moderation was conducted on three courses in 2020. However, no detailed information on the outcomes of that moderation was provided. No external moderation was available for 2020 during the EER enquiry phase. In April 2022, in responding to draft findings from 'this report', NZSATCM advised that it had located external moderation documentation of two sets of assessments from Semester 2, 2020, which had been overlooked at the time of both the 2021 degree monitoring and the EER.</p> <p>The moderation had been conducted in March 2021. The newly retrieved documentation showed that the moderated assessments were generally acceptable. However, the fact that senior leadership, including the academic leader, were not aware of, or had forgotten that recent moderation had occurred, despite having been asked about it in two separate NZQA quality assurance processes, brings into question the efficacy of NZSATCM's assessment and moderation policy, processes and oversight.</p> <p>Although NZSATCM put this lapse down to management and staff changes and disruption caused by COVID-19, the organisation has a responsibility to ensure there is an effective</p>

	<p>system for moderation of assessment materials and decisions. Concerns about this were also noted in the 2021 NZQA degree monitoring report.</p> <p>The blended model of delivery is appreciated by students who can integrate study with the demands of work and families. This blended model also served well during the COVID-19 lockdowns.</p> <p>Stakeholder consultation increased as part of the development of NZSATCM's new Bachelor of Health Science in 2021, including with Māori individuals who have provided valuable input into the integration of Rongoa Māori into the new degree.</p> <p>NZSATCM has recently reconstituted its advisory committee after a two-year hiatus. The first meeting of the new committee was held only two weeks prior to the EER. The new committee includes experienced membership from across the educational and professional sectors, including a rongoā Māori practitioner, and NZSATCM could use this expertise to inform programme delivery.</p> <p>There has been some development in integrating teaching and learning about the bicultural New Zealand environment and professional practice. However, relationships with Māori and iwi to support this are new, or yet to be established.</p>
Conclusion:	Feedback from NZSATCM students indicates that it is meeting their day-to-day needs well. The recently improved interaction with professional stakeholders is expected to strengthen NZSATCM's response to the needs of students, external stakeholders and graduates.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	Students at NZSATCM receive active, integrated and ongoing support from staff at all levels of the organisation. Teachers are attuned to the needs of students and endeavour to meet those needs on a day-to-day basis. Teaching staff described how they share ideas, experiences and knowledge through their daily interactions with each other. A process to link some of the ideas

	<p>brought out in discussions with annual programme review would be a positive step.</p> <p>Students are engaged in their learning, and they have opportunities to apply their knowledge and skills in a range of clinical contexts relevant to their needs. It was concerning that students undertaking clinical placement with practitioners outside of NZSATCM's campus are not visited by NZSATCM staff while on placement. There are written agreements in place with clinical placement practitioners, but these alone do not adequately ensure the safety and integrity of the placements. The written agreements are made directly with the practitioner but not the clinic. There is no information about the clinic or venue where the placement takes place, in these agreements. The agreements lack detail on the level of support that NZSATCM undertakes to deliver during placement – for instance visits to site, communication with students and clinical supervisor, or dispute resolution processes. The agreements state that students are required to pay an 'administration fee' of \$50 to NZSATCM for their clinical placement and may also be required to pay a fee to their supervisor while on placement (the reasons for which are not included). This should be clearly spelt out to students and guidance provided by NZSATCM when fees are negotiated, to protect students and supervisors from potential conflict of interest. Students should be informed of these additional costs prior to enrolment, but neither the NZSATCM Fees Table nor the NZSATCM Student Handbook, mention these additional costs.</p> <p>Teachers provide timely, ongoing feedback to each student on their progress. Currently, small class sizes ensure that teachers can give students individual attention when needed.</p> <p>NZSATCM effectively communicates its expectations on attendance to the students and closely monitors attendance, with timely and appropriate follow-up as needed. Consistently high student retention and qualification completions confirm that these pastoral care processes are effective.</p> <p>The organisation has effective processes to review how well it meets the spirit and intent of the international Code of Practice.³ In future, there will be an opportunity to integrate the self-</p>
--	---

³ Education (Pastoral Care of International Students) Code of Practice 2016

	assessment and management of the international Code with the interim domestic Code – refer 1.6.
Conclusion:	NZSATCM has structured, client-friendly systems for the academic and pastoral care of its students. The organisation is providing a supportive learning environment for its students.

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

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>NZSATCM's organisational strategy is formally documented, and management and staff have a common understanding of the PTE's vision and direction.</p> <p>The challenges brought about by the COVID-19 lockdowns have been significant and have impeded international student enrolment numbers for the immediate future. NZSATCM management has remained committed to the students and staff throughout this period.</p> <p>The positive changes brought about by the recent appointment of a chief executive are still bedding in. Academic leadership is, however, not showing evidence of the depth and range of experience necessary to lead the academic development of the organisation. The previous academic/research leader left the organisation at short notice after only a few months of tenure. The EER team saw that educational performance is at risk due to the high turnover and loss of key academic staff particularly with the disruption it leads to at a time when NZSATCM were developing and embedding systems and processes. For instance, NZSATCM, in explaining the moderation challenges in 2021 (refer 1.3), referenced changes in staff as a possible explanation.</p> <p>An academic committee has been in operation since 2017. Terms of reference for the committee were not available. From minutes and other documentation sighted, it appears that although the committee started out with a wider brief, the primary role of the committee of late, is to approve final results. Although this is an important function, the minutes from 2019 and 2020 do not indicate that the academic or pedagogical discussion</p>

	<p>anticipated in such a committee is taking place, or how the committee's effectiveness is understood.</p> <p>NZSATCM has employed qualified and experienced staff whom it manages effectively and actively develops, although a focus on building capability in teaching and assessment is required. Feedback from students during the EER highlighted a few negatives relating to teaching practice.</p> <p>Systems are in now in place to review the performance of all staff on an annual basis, although a full cycle of performance review has not yet been completed.</p> <p>The new Auckland campus is well supplied with physical and learning resources. This was commented on favourably by students, staff and external stakeholders.</p> <p>Support for research is improving, with a small number of staff now undertaking research, which underpins their teaching. The appointment of an experienced and well-qualified research mentor, and the establishment of a research committee, are positive steps although both are recent and yet to impact on the organisation.</p> <p>The PTE encourages reflection on its role and how to continue to make ongoing and continuous improvements to how it meets the needs of students and other stakeholders. However, much of the self-assessment is informal, individual and fragmented rather than systematic, strategic and informed by high-quality data across the organisation.</p>
<p>Conclusion:</p>	<p>NZSATCM's new leadership has a clear vision and understanding of the business. New and improved management practices and systems for monitoring performance are still bedding in and yet to be fully tested.</p>

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>NZSATCM has made an effort to improve compliance since the last EER but still shows signs of an ad hoc approach to compliance management. The shortcomings in compliance management were highlighted at the last EER, and a recommendation was made in the 2019 EER report to that end. NZSATCM responded with a 'post-EER improvement plan'. However, several of the undertakings made in that plan were either short-lived or not delivered. For instance: that compliance obligations and actions would be recorded in 'digital logbooks' – these were not apparent during this EER visit; or that the two Māori representatives on the advisory committee, cited in NZSATCM's 2019 EER improvement plan, do not appear to have continued their participation based on the minutes and documentation supplied in NZSATCM's latest submission.</p> <p>NZSATCM has completed a self-review of its implementation of the interim domestic Code⁴ and submitted an attestation to this effect to NZQA before 1 March 2021 as required. However, the self-review was completed by only two people and the majority of staff had not heard of the interim domestic Code. Good practice would have involved a wider cross-section of staff in the self-review which would have not only strengthened the self-review but also positively raised the profile of the interim domestic Code amongst staff. The NZQA self-review guidelines for the international and domestic Code recommend 'a whole-of-organisation approach to monitoring and reviewing compliance with the Code'.⁵</p> <p>The PTE has undertaken the yearly self-review of the international Code of Practice and made the required attestation to NZQA within the required timeframe. As previously noted in this report, there is an opportunity to align these two self-reviews.</p>

⁴ The Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice 2019

⁵ NZQA Guidelines for self-review pastoral care codes of practice September 2021, Page 6.

	The EER team selected and checked a random sample of international student files during this EER. All necessary documents were in the files.
Conclusion:	While this evaluation found that core compliance processes around NZQA rules have improved, NZSATCM's approach to compliance management is ad hoc. NZSATCM must take a more coherent approach to understanding and managing its overall compliance accountabilities and managing them on a whole-of-organisation basis.

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:	Marginal
Self-assessment:	Marginal

2.2 International Students: Support and Wellbeing

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	<p>International students are well supported by teachers and student support staff to achieve their goals.</p> <p>Students interviewed during the EER described the range of pastoral care services and interventions, confirming how they have been supported. Most international students are relatively mature and self-reliant.</p> <p>NZSATCM has completed a self-review of their Code of Practice provision using the NZQA template.</p>
Conclusion:	<p>NZSATCM is effectively supporting international students. Staff know their students well and are responding effectively to the needs of the typically mature students, both individually and collectively.</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:

Management:

- Urgently implement processes to engage with graduates and graduate employers on an ongoing basis to enable a greater understanding of value gained.
- Develop stronger processes to monitor, review and respond to important compliance requirements, including the retrieval of moderation records.
- Continue to develop the collection of data for self-assessment and build organisation-wide capability in analysing this data.
- Develop and maintain a comprehensive, whole-of-organisation self-assessment regime that leads to knowledge and actions around continuous improvement of educational performance.

Teaching and learning:

- Consider strategies to increase capability in academic leadership. Review off-site clinical placement, including the written placement agreement and regular monitoring by NZSATCM staff.
- Ensure that additional costs associated with clinical placement are overseen by NZSATCM and clearly communicated to students prior to enrolment.
- Ensure that all staff are familiar with the interim domestic Code and have an opportunity to have input into strategies to continuously improve student support.
- Investigate and put in place ongoing opportunities for educational delivery staff to further develop their teaching capability and practice. This could also include the development of networks with other tertiary education providers both within and outside of the health education sector.

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 1

Table 1. Course and qualification completions, Bachelor of Health Science (Acupuncture)

	Course completion	Qualification completion
2018	89.50%	65.20%
2019	85.40%	83.33%
2020	95.40%	92.86%

Appendix 2

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 fraud⁶*
- 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.*

⁶ 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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz