



Mana Tohu Mātauranga o Aotearoa
New Zealand Qualifications Authority

External Evaluation and Review Report

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

Date of report: 14 January 2026

About Acupuncture Associates Limited

New Zealand School of Acupuncture and Traditional Chinese Medicine (NZSATCM) provides programmes leading to qualifications in acupuncture and Chinese medicine. The programmes are for health professionals and those wanting to enter the Chinese medicine profession and practise as registered acupuncturists.

Type of organisation:	Private training establishment (PTE)
Location:	32 Manukau Rd, Epsom, Auckland
Eligible to enrol international students:	Yes
Number of students:	Domestic: 2025 – 84 students; 2024 – 114 students (84 equivalent full-time students); Pasifika 10, Māori seven, disabled nil International: four students
Number of staff:	12 full-time equivalents
TEO profile:	New Zealand School of Acupuncture and Traditional Chinese Medicine is subject to registration with the Chinese Medicine Council of New Zealand (CMCNZ). The council is a Responsible Authority established under the Health Practitioners Competence Assurance Act 2003 (the HPCA Act) on 1 November 2021 to regulate Chinese medicine services in New Zealand, and must meet the compliance requirements of the Act. CMCNZ has recently conducted an audit of NZSATCM that will determine whether the PTE is meeting accreditation standards and competencies for Chinese medicine.
Last EER outcome:	At the previous EER, in May 2023, NZQA was Not Yet Confident in NZSATCM's educational performance and Not Yet Confident in their capability in self-assessment. NZQA made the following recommendations:

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.

There were no requirements.

Scope of evaluation:	<ul style="list-style-type: none"> • All Student Support and Wellbeing • Bachelor of Health Science (Acupuncture) Level 7 [ID: 126696] (Ref: 4462-1). This degree is three full-time years in duration, delivered to two streams of students. The health professional stream is for online distance students who are working and studying mostly part-time. Students attend one face-to-face block course per semester. Auckland-based students study face-to-face at the Auckland campus. Hybrid classes combine both streams in a mix of online and face-to-face students. The programme includes 500 hours of supervised clinical instruction and practical experience. • The review period for this EER is from 2022-2025
MoE number:	9670
NZQA reference:	C60286
Dates of EER visit:	31 March-3 April 2025

Summary of results

NZSATCM delivers one programme which enables students to gain registration as acupuncturists. However, the PTE has significant organisational weaknesses. The academic team has lost several experienced practitioners and currently lacks cohesion. Inconsistent processes have contributed to unsafe practices. Self-assessment remains very limited.

Not Confident in educational performance

- Most graduates obtain professional registration, leading to employment or self-employment opportunities. However, student completion rates have been highly variable.
- The PTE has not engaged effectively with employers to understand how well the programme prepares students for professional practice.

Not Confident in capability in self-assessment

- Programme delivery is inconsistent and there is weak internal quality assurance, which affects teaching quality
- Practical learning environments have been poorly managed, thus increasing the likelihood of clinical risks.
- Organisational oversight and academic leadership have been weakened by high staff turnover. In recent months some senior teaching staff have not renewed their contracts and there was significantly high staff turnover between 2022-2024.
- Although the current teaching staff are experienced practitioners, most have limited teaching experience and understanding of academic requirements. Most work part-time, and induction problems have occurred.
- NZSATCM is working to resolve significant ongoing issues with programme delivery, including its practical assessments, as well as health and safety issues.
- Despite these initiatives, NZSATCM's self-assessment capability remains limited with time having to be spent responding to external review

and critical events rather than taking a comprehensive, proactive approach to this issue.

Key evaluation question findings¹

1.1 How well do students achieve?

Performance:	Poor
Self-assessment:	Poor
Findings and supporting evidence:	<p>Achievement² has been variable for the period 2022-24, with high course completions but low qualification completions. Although qualification completions have improved, less than 50 per cent of enrolled students achieved the qualification between 2022 and 2024.³</p> <p>Some students are offered flexible learning solutions which affects the time taken to complete the programme. Data provided indicates that 36 per cent (13 of 36) of students, and overall (36 of 81) 44 per cent of students withdrew from the programme for personal reasons or changed to another school (between 2022 and 2024). Student withdrawals also include three students who were withdrawn from the four-year programme and were re-enrolled on the three-year programme.</p> <p>Māori and Pasifika participation is less than 6 per cent of the total enrolled in 2024. Data about priority student achievement is unclear and incomplete for 2022-24. In 2023 there was a disproportionate difference of 25-26 per cent in course completions for Māori and Pasifika students.⁴</p> <p>NZSATCM achievement data is muddled and incomplete. For example, NZSATCM was unable to explain the significant discrepancies between Tertiary Education Commission (TEC) data and their internal data. NZSATCM is not effectively reviewing and analysing achievement</p>

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

² Tertiary Education Commission (TEC) data has been referenced here due to a mismatch between NZSATCM student management data and TEC data extracted from the single data return that NZSATCM supplies to the TEC.

³ Refer to data table in Appendix 1.

⁴ No students identified with a disability during the period.

	trends, including non-completions and withdrawals. This reduces NZSATCM ability to fully understand educational performance and limits their ability to identify where interventions may improve student achievement. We understand that NZSATCM is implementing a new student management system which may help address reporting issues.
Conclusion:	Poor qualification achievement rates are undermined by ineffective systems and processes to inform understanding of achievement data. This significantly hinders capability in self-assessment.

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	<p>Students gain skills in providing supportive treatments and effective patient-practitioner interactions. Graduate confidence levels are developing to create treatment plans. Anecdotal evidence from graduates and employers interviewed during the EER indicates that graduates gain some valuable work-ready skills and knowledge in acupuncture and traditional Chinese medicine.</p> <p>Some graduates said they needed to gain a broader range of patient illnesses to be confident in treatment plans, and that their learning experience was limited. NZSATCM's school clinic receives a limited number of patients, and NZSATCM requires students to invite friends and family as patients in order to complete the required 500 hours of practicum for the programme. In NZQA's view, relying on students to bring their own patients could limit their exposure to different illnesses and treatment experiences.</p> <p>Students who gained placement in external clinics get wider experience as they get exposed to and help treat patients with a wider range of ailments in these clinics. However, some students told the evaluators that it was difficult to find these external clinic placements to meet the proscribed practicum clinic hours for the programme.</p> <p>Graduates are eligible to register as practitioners with Acupuncture New Zealand and the Chinese Medicine</p>

	<p>Council of New Zealand.⁵ Destination data for 2022-24 indicates that 43 of 51 graduates (84 per cent) were registered with CMCNZ. Twelve graduates have opened their own practice and 15 are working in medical centres across New Zealand. NZSATCM is unable to state where or if the other 16 graduates are practising.</p> <p>NZSATCM has limited engagement with employers in acupuncture and traditional Chinese medicine, or the professional body representing acupuncture and traditional Chinese medicine practitioners in New Zealand. NZSATCM does not seek formal feedback from employers about how well their graduates are performing and contributing to the sector, or of the value of outcomes.</p>
Conclusion:	<p>Although graduates value their training and most NZSATCM graduates become registered, the experiential learning is variable. There is limited evidence from employers about the value of graduate outcomes to understand the value of the programme.⁶</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:	Marginal
Self-assessment:	Marginal
Findings and supporting evidence:	<p>There is variable evidence of ongoing external review and consultation by NZSATCM with industry stakeholders across the reporting period. The external advisory committees (including a Māori advisory committee and the research committee) have had disruptions at various times, and new groups were re-established in late 2024. There has been limited contribution to programme review. It is</p>

⁵ Acupuncture NZ is the professional body representing practitioners of acupuncture and Chinese medicine in New Zealand. To become a member, practitioners need to be registered with the newly formed Chinese Medicine Council of New Zealand (CMCNZ) and hold a current Annual Practicing Certificate. Acupuncture NZ is a member of Allied Health Aotearoa New Zealand. CMCNZ regulates Chinese medicine services in New Zealand.

⁶ In 2023, the PTE was told very directly in an EER report: 'Urgently implement processes to engage with graduates and graduate employers on an ongoing basis to enable a greater understanding of value gained'.

	<p>also unclear how staff and student feedback is consolidated to inform overall programme review.</p> <p>Programmes are planned with clear outlines for content delivery. A mixed mode of delivery includes students face-to-face in the classroom and an online live streaming or recorded video for distance students. This allows courses to be delivered to both streams of students at the same time. However, there is ineffective organisational guidance or support for teaching staff to enable consistent and high-quality online teaching and learning. Online learning activities and resources are variable in quality.</p> <p>Clinical practice provides engaging learning environments, but supervision and treatment methodologies are inconsistent and limited in their ability to provide effective oversight of student safety practices and clinical assessment processes. Internal staff training has been implemented to address these issues, and new processes have been put in place in an attempt to improve supervision of students' practice. However, the effectiveness of these initiatives is still to be seen. The acting programme leader (in position for three weeks at the time of the EER) has provided the evaluators with acupuncture point charts⁷ used in diagnostic evaluations and reference texts for guidance. The effectiveness of these initiatives is still to be seen.</p> <p>NZSATCM relies on distance students to arrange their own practical clinic experience, and Auckland students to arrange their own patients, resulting in sometimes limited clinic experience. NZSATCM has no oversight of the quality of distance student experiences, and professional practice support is variable.</p> <p>Assessment design is not always fit for purpose, with some student feedback noting unclear assessment requirements. Although this feedback sometimes leads to changes, there is no systematic review of student feedback on assessments that leads to review and improvement of assessment tools. Evidence indicates that six assessments were internally pre-assessment moderated by the previous programme leader in 2023, and two assessments were pre-moderated in 2024, but no internal post-assessment moderation evidence was provided during the reporting</p>
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⁷ These charts provide detailed information about specific acupuncture points, including their locations, functions and indications.

	period for NZSATCM to understand the consistency of assessment practices. External post-assessment moderation completed by experienced academics in 2025 provided useful feedback, validating assessor decisions and guiding development of assessor practice.
Conclusion:	Issues with programme design and delivery are impacting students. There is limited evidence that all stakeholder feedback is used effectively to inform regular programme improvements. Most improvement actions are reactive, responding to critical incidents or issues identified by external feedback and review.

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

Performance:	Poor
Self-assessment:	Poor
Findings and supporting evidence:	<p>Student pathway goals are clear, with most students intending to practise acupuncture or Chinese medicine. These goals are documented at enrolment.</p> <p>It is less clear how well student learning needs are determined and supported from the start of the programme, and how this information is used to reduce barriers to learning. This is significant given the continual high number of student withdrawals.</p> <p>Student induction processes are poorly managed and fail to inform all students about their programme in a timely manner. Compulsory orientation for students in the health professional stream, and block weeks at the college have been poorly coordinated and have impacted the students' personal schedules, according to students interviewed during the EER. Block courses are also poorly managed, wasting students' valuable time as staff juggle multiple courses for classes, an issue noted in the previous degree monitor's report for 2024.</p> <p>A Reflective Learning Portfolio is used to track student progress. Students who miss classes are expected to catch up on their own, often without effective online materials or class recordings. Teachers discuss at-risk students during team meetings and arrange support for</p>

	<p>student learning needs as well as additional support during their limited contact time.</p> <p>Although NZSATCM has appointed a pastoral care support person, this is not a dedicated role. Pastoral care support is provided through the teaching staff, and technical support for online learning is available. It is unclear how NZSATCM knows about the uptake or effectiveness of their student wellbeing support mechanism. Students with wellbeing needs are referred to an external counsellor who visits the college weekly. The acting programme leader offers some support outside of his class times. Students do not always receive timely feedback, and the marking policy is unclear in its guidance to teaching staff.</p> <p>Vague policies and procedures on clinical supervision, and responses to incidents of adverse events when reported to staff are poorly managed. For example, a cupping incident resulted in a student receiving burns. The student complaint made to a supervisor was not addressed or reported to management and no action was taken.</p> <p>In 2023, an external registered Chinese medicine practitioner made NZSATCM aware of an adverse needling event involving a student. NZSATCM investigated the matter and found several issues:</p> <ul style="list-style-type: none"> • Students did not always report adverse events. • A teacher dismissed concerns of a possible adverse event and did not take any further action. • Teachers were not always made aware of adverse events. • Students practise treatment applications on their peers. Teachers with large class numbers left students to attend to peers who had become unwell after receiving treatment. • There were instances reported of students being dissatisfied with the pastoral care and support. <p>These issues highlight negligence by NZSATCM staff, disregard for student care, and amount to breaches of the Education (Pastoral Care of Domestic and International Learners) Code of Practice 2021 (the Code of Pastoral Care).</p>
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	<p>NZATCM has in response developed a number of initiatives, including the planned appointment of a pastoral care officer. It is unclear, however, whether these initiatives have been fully implemented, including whether a dedicated pastoral care officer has been appointed. As the evaluators understand it, despite the student services/pastoral care administrator role at NZSATCM, NZQA has seen no evidence that this appointment has been effective for managing both distance and full-time student pastoral care. In NZQA's view, NZSATCM needs to take stronger action for the supervision of students in clinics and provide the necessary support for all students in practical training.</p> <p>Although student satisfaction feedback is reviewed twice a year, there is little evidence that this feedback and other anecdotal student complaints are adequately addressed and proactively used to inform ongoing improvements to student support needs and programme changes. Evidence from surveys and anecdotal information does not clearly correlate. This shows that the survey process does not allow for free and frank responses. NZSATCM needs to review its feedback mechanisms to ensure students are comfortable to offer open and honest feedback without fear of repercussions.</p>
Conclusion:	Support for student wellbeing needs is weak, and risks to student health and safety have not been effectively managed. Poor systems and processes do not support ongoing improvements, are not adequately used for self-assessment, and do not meet minimum expectations.

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

Performance:	Poor
Self-assessment:	Poor
Findings and supporting evidence:	NZSATCM has faced several challenges during the period covered by the EER, including leadership changes, staffing issues and inconsistent governance. The directors were working full-time in supporting roles and were familiar with the challenges when the chief executive officer and academic leader resigned in September 2022.

	<p>The directors have attempted to resolve previous challenges; however, two longstanding programme leaders did not accept their new contract/employment agreements at the end of 2024, which led to a significant loss of academic leadership. It has also exacerbated some inconsistencies in delivery, student support and health and safety practices. NZSATCM appointed an acting programme leader in February 2025.</p> <p>The introduction of a fully distance-delivery mode has created some issues with the quality of face-to-face, online and hybrid learning experiences and difficulties accessing suitable practical clinic experience. Academic leadership is the responsibility of the academic director and a part-time, acting programme leader with a complex portfolio. Most staff are contracted for limited hours, which creates a challenge to manage the quality and consistency of teaching and learning practice. A key focus for the newly appointed programme leader will be ensuring adherence to important policies and assessment timeframes, in addition to their teaching workload.</p> <p>Organisational communication has, in NZQA's view, been ineffective. Staff lack a clear understanding of teaching expectations and require development in online teaching practices. There is no systematic approach to appraisals or observation of teaching practice, with student evaluations the only feedback mechanism for contracted part-time staff. New safety processes developed to strengthen safe treatment practices have met with staff resistance and differences of opinion. For example, NZSATCM had to coerce staff to adopt a single needling method for acupuncture.⁸ The impact of these safety changes are yet to be seen.</p> <p>Staff orientation and ongoing support for new teaching staff is inadequate, compromising the quality of teaching and learning. The use of short-term, limited-hour contracts for academic staff undermines the quality and sustainability of educational practices.</p> <p>Recently appointed staff are not involved in research activities, and the research leader has not renewed their</p>
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⁸ Findings in the NZQA degree monitoring report in 2024 state: 'A lecturer commented that there was "no consistency" across the course in the teaching of appropriate needle angles, needle depths and length of needles used. This comment was followed by a statement that "transparency is a concern".'

	<p>contract in 2025. Staff with published research have also not renewed their contract. Some clinic staff have presented at Acupuncture NZ annual conferences. NZSATCM does have a journal club to encourage research engagement; however, research activities have significantly reduced following the resignation of key senior staff, including the research leader. This presents a problem for NZSATCM in maintaining staff research requirements for delivering the degree programme.</p> <p>There is little evidence of how data is used to gain an understanding of educational performance, nor as part of self-assessment to bring about continuous improvements. NZSATCM is largely reactive in its response to change. Decisions made to improve the two learning streams have not been effective, and there has been no systematic review of student feedback and staff meetings. Information is not consolidated to see what decisions are required, and solutions are not recorded to review and monitor effectiveness. Management appears to focus their energy on fixing problems rather than planning and monitoring for improvements.</p>
Conclusion:	NZSATCM faces significant challenges in leadership, staffing, communications, teaching, research, data management and use, and future planning. NZSATCM needs to embed reflection, review and self-assessment into its business processes to ensure that areas for improvement are self-identified and acted on.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Marginal
Self-assessment:	Poor
Findings and supporting evidence:	<p>NZSATCM does not have robust processes to meet some key compliances. Management of compliance is currently shared by the two directors and managed through a calendar system.</p> <p>NZSATCM submissions of the annual attestations and self-review of the Code of Pastoral Care are up to date.</p> <p>Information about policies and procedures sits across several different documents and is not detailed or</p>

	<p>accessible enough to provide sufficient guidance for all staff on important competencies and clinical practices.</p> <p>The recent NZQA degree monitoring report (16 September 2024) identified areas of non-compliance, resulting in an action plan that is still in progress at the time of the EER. Findings in this EER align to the findings in the degree monitoring report.</p> <p>An international file check highlighted errors in enrolment processes, poorly managed student file evidence, and incorrect, outdated and incomplete documentation. NZSATCM was not aware that some documentation was required. Although further evidence was provided weeks later, which indicates complete files, NZQA is not assured that processes, practices and organisational knowledge are sufficient to manage this compliance obligation going forward.</p> <p>NZSATCM failed to notify NZQA of the non-delivery of programmes. Five programmes have been lapsed in the past year.</p> <p>NZSATCM is not meeting the requirements of the Code of Pastoral Care. Insufficient supervision led to a student injury and students feeling unwell as result of treatment in clinical practice and inadequate student care. More broadly, students' complaints did not lead to appropriate actions to ensure that student wellbeing and safety was monitored, and appropriate care given.</p> <p>Known serious incidents that were investigated but not recorded in the organisation's critical incident log/register is an indication that NZSATCM does not keep an appropriate record of health and safety incidents or other serious incidents.</p> <p>Although policy and procedures are available in the human resources manual, there is limited evidence that they are used in practice.</p>
Conclusion:	<p>Management of key compliances have been variable, and inconsistent processes lead to significant weaknesses in self-assessment which have not been managed effectively.</p>

Focus areas

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

2.1 Bachelor of Health Science (Acupuncture) (Level 7)

Performance:	Marginal
Self-assessment:	Poor

2.2 All Student Support and Wellbeing

Performance:	Poor
Self-assessment:	Poor

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 NZSATCM:

Consider carefully the findings and ratings in this EER report and develop a comprehensive, multi-point improvement plan with actions, timeframes, responsibilities all of which details how improvement will be both monitored and determined.

NZSATCM should seek external expert assistance to develop and execute this plan given its limited internal capability. The plan, in our view, should:

- Review staffing processes to ensure they fully support the programmes delivered, the needs of the stakeholders, and the quality of educational outcomes.
- Systematically collect and analyse data and information to gain a better understanding of student achievement and the value of the learning to stakeholders and graduates.
- Provide professional development for staff to improve their ability in online teaching and learning, including identifying and responding appropriately to diverse learning needs.
- Implement a systematic process for reflection, review and improvement, informed by quality data to simplify and update policies and procedures so they are fit for purpose and contribute to the quality and consistency of all educational activities.
- Develop stronger processes to monitor, review and respond to important compliance requirements
- Establish a robust complaints system aligned with Outcome 2 of the Code of Pastoral Care. This system should be capable of effectively addressing learner concerns and be proportionate to the complexity of each complaint, ensure the complaints process is easily accessible and understandable for all student and appoint a dedicated support person to guide and assist students throughout the complaints process (Clause 13 (a-d)).
- Implement a transparent system for the annual reporting of complaints to management, learners, and stakeholders. This should include data on the number, nature, and outcomes of complaints, ensuring accountability

and continuous improvement (Clause 13 (e-f)) of the Code of Pastoral Care.

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.

NZQA requires NZSATCM to:

- Establish that adequate and effective processes for programme review and staff research are ongoing, as required for the delivery of degrees in accordance with Part 1, criterion 7 and 8 of rule 4.1 and rule 13.2 (b), and 15.2 (a)(b) of the NZQF Programme Approval and Accreditation Rules 2022 and Section 454(3) of the Education and Training Act 2020.
- Have plans in place to effectively respond to emergency situations. Have information on these plans readily available to students when they begin their studies as required by Outcome 1 Clause 10 (1), (2), (3) of the Code of Pastoral Care. This includes:
 - ensuring all students, including disabled students if any are enrolled, know the relevant emergency plans
 - ensuring all relevant staff understand the signs that a learner or others may be at risk and know the appropriate actions they can take to help or ensure safety. (clause 10 (3) (e))
 - having suitably prepared, contactable staff members available for students in an emergency
 - having a critical incident and emergencies procedures manual containing the immediate and ongoing actions for staff to effectively respond to emergency situations.
- Ensure student files for all international students enrolled by NZSATCM contain evidence of visa currency, student fee protection and current insurance. This relates directly to the processes under Outcome 10 of the Code of Pastoral Care. It is also a requirement of Rule 4.1 of the PTE Enrolment and Academic Records Rules 2022.

Appendix 1

Table 1. Educational performance – completion rates 2022-24

Year	Data source	2022	2023	2024
Course completion rates	NZSATCM Enrolpro data	90%	92%	79%
	TEC Ngā Kete data	89%	71%	76%
Qualification completion rates	NZSATCM Enrolpro data	134%	67%	63%
	TEC Ngā Kete data	38%	42%	49%

Data supplied by NZSATCM

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 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

While there are new 2025 Rules in place replacing the Private Training Establishment Registration Rules 2022, PTE Registration, and Micro-credential Rules, the review period covers when the 2022 Rules were in place.

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2022, which are made by NZQA under section 452(1)(t) of the Education and Training Act 2020 and approved by the NZQA Board and the Minister of Education.

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 excluding universities, and*
- maintaining micro-credential approval for all TEOs other than universities.*

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2022, the Consent to Assess Against Standards on the Directory of Assessment and Skill Standards Rules 2022 and the Micro-credential Approval and Accreditation Rules 2022 respectively.

In addition, the Private Training Establishment Registration Rules 2022 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes, micro-credentials 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 2022. 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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