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Report of External Evaluation and Review

Mahitahi Trust

Not Confident in educational performance

Not Confident in capability in self-assessment

Date of report: 19 May 2017

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Final Report

Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.

Introduction

1. TEO in context

Name of TEO:	Mahitahi Trust
Type:	Private training establishment (PTE)
First registered:	31 July 1994
Location:	15A Ronwood Avenue, Manukau City
Delivery sites:	5 Earl Richardson Avenue, Manukau City All students undertake work-based learning.
Courses currently delivered:	National Certificate in Mental Health and Addiction Support (Level 4)
Code of Practice signatory:	No
Number of students:	Domestic: 50 EFTS (full-time equivalent students)
Number of staff:	Two full-time equivalents within the PTE arm (manager/tutor and tutor), plus other Mahitahi staff to support governance and quality management.
Scope of active accreditation:	National Certificate in Mental Health and Addiction Support (Level 4) Mahitahi Trust holds a range of domain and standard consents to assess generally within the health and business areas to support the delivery of a programme leading to the National Certificate in Mental Health and Addiction Support: http://www.nzqa.govt.nz/providers/ngf-accreditations.do?providerId=739046001

Distinctive characteristics:	Mahitahi Trust is a South Auckland-based kaupapa Māori organisation providing support to mental health clients through the provision of community-based services and programmes. These include child and youth, adult and residential health services. The PTE's tertiary educational delivery supports this wider focus on Māori health and wellbeing.
Recent significant changes:	No significant recent changes.
Previous quality assurance history:	NZQA conducted an external evaluation and review of Mahitahi Trust in 2012. NZQA was Confident in the educational performance and Confident in the capability in self-assessment of Mahitahi Trust at that time.
Other:	Significant aspects of delivery are based on workplace learning.

2. Scope of external evaluation and review

The scope of the external evaluation and review was twofold:

- Governance, management and strategy
- National Certificate in Mental Health and Addiction Support (Level 4).

This selection ensured coverage of the mandatory focus area, as well as the sole programme offered by the trust.

3. Conduct of external evaluation and review

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

The evaluation team consisted of two evaluators. The team visited Mahitahi Trust on 14 and 15 September 2016.

Interviews (in person, groups, or via telephone) were held with:

- The senior leadership team (including the chief executive)

- the board Chair
- education manager (who is also involved in tutoring)
- the second tutor
- a representative sample of current learners and graduates
- community stakeholders selected by Mahitahi Trust, including organisations that have had students on placement and employ graduates.

The evaluation team is confident that sufficient staff, stakeholders and students were interviewed for evaluation and review purposes.

During the site visit, Mahitahi Trust provided the evaluation team with a range of operational documentation, including planning materials, management meeting minutes, quality management policies, enrolment information and policies, and course design, delivery and assessment materials. This documentation complemented the self-assessment information that had been submitted prior to the site visit. The evaluators undertook a sample review of all materials tabled.

Following the site visit, the evaluation team sought resolution of the Mahitahi Trust's application for a new programme approval and accreditation, in order for NZQA to finalise its EER findings. The progress of this application was discussed with the evaluation team on 19 January 2017.

Summary of Results

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

NZQA is **Not Confident** in the educational performance of **Mahitahi Trust**.

NZQA is **Not Confident** in the capability in self-assessment of **Mahitahi Trust**.

This evaluation and review has found that a critical weakness exists in regard to compliance in the awarding of formal qualifications – namely at the time of the site visit Mahitahi Trust could not demonstrate it had a necessary course approval in place, nor that the Trust remained compliant with the conditions expected from past course approval requirements. This undermines other educational performance findings – including some positive learning outcomes – as detailed in Findings 1.1-1.6. Mahitahi Trust has now worked to address these matters.

Mahitahi Trust has minimal self-assessment systems in place, and was not able to provide comprehensive self-assessment materials covering all evaluative areas prior to or during the site visit. The half-page summary submitted largely omits critical areas of educational performance. For example, it does not detail how Mahitahi Trust reflects and improves on learning outcomes, effective teaching and student support systems. This is a significant gap in the gathering, analysis and reporting of key information required to ensure comprehensive and consistent education delivery of a high quality. The evaluation has found that a culture of self-reflection is not yet embedded within education delivery and overall management, which has likely contributed to the significant educational performance compliance issue noted above. Overall, this evaluation and review finds that the lack of depth in self-assessment practice is limiting the effectiveness of Mahitahi Trust in achieving the positive and admirable vision it has for its learners.

Findings¹

1.1 How well do learners achieve?

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

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

In evaluating how well learners achieve, this evaluation has taken into consideration the extent to which learners complete formal qualifications, acquire useful skills and knowledge (developing their cognitive abilities), and improve their overall wellbeing with enhanced abilities and attributes.

Formal qualification attainments matters

Since 2009 Mahitahi Trust has retained approval to award the National Certificate in Mental Health (Mental Health Support Work).² However, in 2011 NZQA determined that this qualification would cease as at 31 December 2016. At the time of the site visit (September 2016), Mahitahi Trust had not gained approval to deliver training towards the replacement qualification, the National Certificate in Mental Health and Addiction Support – despite enrolling learners in this new programme leading to this qualification from 2015.³ In effect, this situation meant that since 2015, students have been incorrectly enrolled in a programme that Mahitahi Trust did not have approval to offer. This is unacceptably poor performance.⁴

In addition, information to support the delivery of the National Certificate in Mental Health (Mental Health Support Work) – such as evidence to show how delivery is consistent with the course approval – was not able to be provided to the evaluation team during the site visit when requested. The evaluation team is therefore unable to express confidence that the formal qualification was being awarded appropriately at that time (i.e. that learners were completing sufficient hours of study, covering

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 Mahitahi Trust gained approval to award this qualification in 2009.

³ As stated on the 'TEO Details' declaration submitted for this EER.

⁴ Note that Mahitahi holds consent to assess for all standards leading to the National Certificate in Mental Health (Mental Health Support Work) (Level 4) and the National Certificate in Mental Health and Addiction Support (Level 4). Because of this, as long as students meet all requirements, they are eligible for award of the qualification(s). The issue of concern relates to the failure of Mahitahi to have appropriate course approval in place during 2015 and 2016.

the full range of required unit standards adequately). Again, this is unacceptably poor practice and places the validity of formal student learning outcomes at risk.

Further to this, information on formal learning outcomes (course and qualification completion rates) was not provided in self-assessment materials, nor clearly articulated during the site visit.

Acquisition of useful skills and knowledge

The self-assessment summary information submitted for this evaluation and review indicates that useful skills and knowledge are acquired by learners, as evidenced by 60 per cent of learners working within the sector. Detailed data to support the linkage between this qualification and the gaining of employment was not, however, submitted in the self-assessment document, nor tabled during the site visit.

Notwithstanding, the evaluation team heard evidence from learners and graduates – some of whom were staff members working for Mahitahi – that their learning experiences had significantly aided their work practices and improved their employment outcomes (in pre-existing work settings). This is positive, but the self-assessment processes to validate this need to be strengthened.

For this evaluation and review it was expected that Mahitahi Trust would be able to outline how well it considers learners achieve in relation to the completion of formal qualifications via its own self-assessment processes – and the aggregate data would be listed in management and board-level documentation (such as meeting minutes). This has not occurred systematically, and Mahitahi Trust staff (and management) have not collated and analysed data to be fully aware of qualification completion rates. Accordingly, the evaluation finds this is a significant weakness in self-assessment practice.

Māori and Pasifika outcomes

At the time of this EER, Mahitahi Trust advised that the majority of learners identified as Māori. Accordingly, results discussed – including outcomes – are considered to apply to Māori learners. The evaluation team considers that Mahitahi Trust is highly responsive to Māori learning needs, and demonstrated this via its Kahurangi Outcomes Framework.

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

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

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

In evaluating the value of outcomes for key stakeholders, including learners, this evaluation has taken into consideration the quality of learning and how Mahitahi Trust engages with communities and identifies relevant stakeholder groups.

As advised under Findings 1.1, current learners and graduates interviewed value the outcomes of their learning, but Mahitahi Trust needs to more systematically gather the views of all graduates to improve self-assessment practice.

The evaluation team spoke with a small number of community stakeholders and employers. These stakeholders endorsed the learning outcomes achieved by graduates; and consider that the programme generally assists learners for the type of employment sought (namely, in the mental health support area). Mahitahi Trust's self-assessment of valued outcomes is largely informal and relies on general feedback received from employers during placements.

The programme is not linked to higher qualifications at other tertiary institutions. Mahitahi Trust has yet to explore such options. The evaluation team considers this area should be reflected upon within self-assessment practice, to ensure ongoing alignment with developments within the tertiary education health sector.

1.3 How well do programmes and activities match the needs of learners and other stakeholders?

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

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

In evaluating the matching of programmes and activities with the needs of learners and stakeholders, this evaluation has taken into consideration the extent of ongoing needs analysis, the maintaining of relevance, developments in subject content, the incorporation of relevant teaching practice and technologies, and the adequacy and appropriateness of resources.

While an initial interview is used for enrolments, Tertiary Education Commission (or other) numeracy and literacy tools are not used to pre-assess the levels of learners on entry. This is not good practice, given that Mahitahi Trust is seeking to enrol learners who they consider may have previously been unsuccessful in education settings. Mahitahi Trust should improve its approaches for ensuring a match of programmes to the needs of learners.

Mahitahi Trust does not have demonstrable relationships with other education providers to ensure ongoing relevance within the sector. Instead, there is a heavy reliance on the personal networks of the programme leaders. There is not strong evidence (beyond the tutors' personal efforts) of Mahitahi Trust self-reviewing programme design to ensure incremental improvements can be made on an annual basis.

The physical teaching room available is suitable for learners – although some learning also takes place at an off-site location. At the time of the site visit, Mahitahi Trust had not sought NZQA approval to deliver from the off-site location (a situation that is now rectified). However, much learning time occurs in workplace

settings. How Mahitahi Trust fully ensures learning is occurring within these settings – to the extent required for a level 4 programme – was not clearly demonstrated during the site visit. That is, self-directed study and work-based learning appeared to have very limited structure, guidance and monitoring from Mahitahi Trust. During the evaluation and review, Mahitahi Trust was not able to satisfactorily explain these matters to the evaluation team. Further self-assessment is required – and potentially revised educational practice – to ensure programmes are fully fit for purpose, and to reflect what has been approved.

Because of these matters, the evaluation team considers that educational performance does not meet minimum requirements in this area, and that self-assessment practice has a serious weakness and has not lead to improved practice or outcomes.

1.4 How effective is the teaching?

The rating for performance in relation to the effectiveness of teaching is **Adequate**.

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

In evaluating the effectiveness of the teaching, consideration has been given to whether learning environments are planned and structured for the benefit of students, whether activities engage learners, and whether they provide opportunities to apply knowledge and skills. The evaluation has also considered whether assessment practices are valid, sufficient, fair and transparent.

The evaluation has found evidence (from interviews) that the tutors are effective. In particular, a focus on subject knowledge strength was identified by learners, graduates and other stakeholders as positive attributes.

There is scope for Mahitahi Trust to have its programme delivery (and assessments) reflected on by an impartial third party, for example by implementing activities such as tutor observations and/or programme reviews. Without these types of activities, self-assessment of teaching effectiveness cannot be fully assured at this time. These matters are not clearly articulated within the Mahitahi Trust summary of self-assessment.

For this evaluation, template assessments were sighted. As far as can be determined, the evidence shown indicates fair and transparent assessment approaches. Internal moderation occurs between the tutors. External moderation requirements with the standard-setting body, Careerforce, were met in 2014 and 2015.

Given the mixed range of evidence presenting, on balance the evaluation team is confident that the effectiveness of teaching remains adequate at Mahitahi Trust. However, self-assessment in these areas has ongoing weaknesses in that a reflective approach is not yet established.

1.5 How well are learners guided and supported?

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

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

In evaluating how well learners are guided and supported, this evaluation has taken into consideration whether learners are provided with comprehensive and timely study information, continued support appropriate to their needs, an inclusive learning environment, and minimal barriers to learning.

Mahitahi Trust focuses on learner guidance and support. Learners advised that they are generally aware of their programme structure, upcoming assessments, and their learning progress to date.

There is a clear recognition that learners may present with non-academic needs, and to that end guidance support systems are in place, via the manager and tutor. On balance, given the support that is readily available through the wider Mahitahi Trust community, the evaluators found performance was adequate in regard to the provision of learner guidance and support. This area could be strengthened with a focus on individual learning plans that better recognise the unique needs of learners and include pre-assessment tools and more structured support. The self-assessment document presented for this evaluation and review has not yet probed such matters. More structured, reflective practice in this area is required.

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

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

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

This evaluation has considered how well managers and governors respond to change, use results of self-assessment for improvements, have a clear organisational purpose, balance innovation and continuity, provide effective leadership, allocate resources, ensure policies are legal and ethical, and value staffing contributions.

The senior leadership team of Mahitahi Trust provided a clear overview of their approach, and renewed focus on organisation-wide quality assurance. This is good practice, but it has yet to significantly impact on the PTE arm of the trust. Ultimately, at the time of the site visit Mahitahi Trust was not compliant with NZQA course approval requirements (refer Findings 1.1 and 1.3). Such breaches of regulatory requirements are unacceptable educational practice. It is noted that

Mahitahi Trust has now resolved these issues (renewed course approval and delivery site approval has been gained).

The evaluation team did not find clear evidence of executive-level reviews of the outcomes being achieved by learners within the meeting minutes reviewed. At best, PTE operational matters received an occasional mention. This lack of strategic consideration places Mahitahi Trust at risk of not fulfilling its desired vision for its tertiary education learners at this time.

Focus Areas

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

2.1 Focus area: Governance, management and strategy

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

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

The failure of governors and managers to ensure compliance in relation to course approval – and a lack of awareness of this matter prior to the EER – determine this outcome.

2.2 Focus area: National Certificate in Mental Health and Addictions Support (Level 4)

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

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

The failure to have in place required course approval for this programme – and a lack of awareness of this prior to the EER – determine this outcome.

Recommendations

It is recommended that Mahitahi Trust:

- Urgently review qualifications awarded since 2015 (or earlier if necessary) to determine whether learners completed components for a qualification that Mahitahi was able to award, and work with NZQA to address any issues arising from such a review
- Urgently work to undertake a full internal self-assessment and review
- Draw upon renewed self-assessment processes to improve education delivery
- NZQA further evaluate and review the performance of Mahitahi Trust once sufficient opportunity has been given to embed revised practices.

Appendix

Regulatory basis for external evaluation and review

External evaluation and review is conducted according to the External Evaluation and Review (EER) Rules 2013, which are made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

Self-assessment and participation in external evaluation and review are requirements for maintaining accreditation to provide an approved programme for all TEOs other than universities. The requirements are set through the NZQF Programme Approval and Accreditation Rules 2013, which are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

In addition, the Private Training Establishment Registration Rules 2013 require registered private training establishments to undertake self-assessment and participate in external evaluation and review, in accordance with the External Evaluation and Review Rules (EER) 2013, as a condition of maintaining registration. The Private Training Establishment Registration Rules 2013 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

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

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the External Evaluation and Review (EER) Rules 2013.

The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

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

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz).

The External Evaluation and Review (EER) Rules 2013 are available at <http://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/EER-Rules.pdf>, while information about the conduct and methodology for external evaluation and review can be found at <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>.

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