

24 September 2018

redacted s9(2)(a)

Dear redacted s9(2)(a)

I refer to your request of 9 September 2018, under the Official Information Act 1982 (the OIA), for the following information:

*"I have read the above report [the External Evaluation and Review Report for redacted 9(2)(b)(ii) again. The questions below remain unanswered by NZQA. Rather than you giving me a copy of all relevant documents and correspondence under the OIA, wouldn't it be more efficient for NZQA (and for me) if someone from NZQA agrees to an interview or at least to answer the questions?"*

- 1. My key concern: Did NZQA attempt to ascertain if the homeopathy taught was efficacious in treating any physical illness? If not, why not?*
- 2. The report mentions the two evaluators. Who were they? What qualifications did they possess to evaluate medical treatments?*
- 3. It seems very likely that there was no effort made by NZQA to assess the real value and validity of the information being imparted. I can find no evidence of this in the report. I'd like to know if you have made any attempt to inform the public and prospective students that you have not assessed the real worth of this course.*
- 4. Did you use homeopaths to assess whether the course content is valid?*

*Please regard this as an official request under the Official Information Act. But as I have clearly stated above, I'd rather someone from NZQA just answers my questions. In that case, I won't want all that documentation."*

We apologise that there was no further response to your email of 22 August 2018.

The New Zealand Qualifications Authority (NZQA) has interpreted your request as comprising the following two alternatives;

- (a) a request for NZQA to respond to the above quoted questions or agree to an interview; or
- (b) a request for all documents and correspondence related to NZQA's completion of the External Evaluation and Review (EER) report for redacted 9(2)(b)(ii)

As you have clearly indicated that (a) is your preference, NZQA has provided responses to your questions below in lieu of all documentation related to the completion of redacted 9(2)(b)(ii) EER report.

NZQA has provided the following contextual information regarding New Zealand qualifications and programme approval.

- New Zealand qualifications (to be listed on the New Zealand Qualifications Framework) are based on four design principles; need, outcomes, flexibility and collaboration. These principles ensure qualifications identify the skills, knowledge and attributes graduates need to perform a range of roles across a broad context. If a qualification meets these design principles, and specific approval criteria, it may be approved by NZQA.
- NZQA assesses applications in relation to a set of criteria determined by the Education Act 1989 and the NZQA Rules. For programmes leading to a qualification, NZQA looks for design and an overall coherence that is clearly linked to the qualification outcomes. Providers wishing to deliver approved programmes must demonstrate they can do so as intended and to an acceptable standard. All criteria are published on our website: <https://www.nzqa.govt.nz/providers-partners/approval-accreditation-and-registration/>
- NZQA charges a fee for qualification approval, programme approval and programme accreditation applications. NZQA does not approve funding for the delivery of approved programmes. The Tertiary Education Commission (TEC) is responsible for providing funding to tertiary education organisations. You can find more information at the TEC's website <http://www.tec.govt.nz/>.

In answer to your questions. I note;

**1. Did NZQA attempt to ascertain if the homeopathy taught was efficacious in treating any physical illness? If not, why not?**

No. NZQA's quality assurance role in the non-university tertiary education sector is to assure educational merit, not to validate specific content. Where an industry or sector has a regulatory body, that is their role. Where there is no regulatory body, stakeholders and any potential employers take this responsibility.

**2. The report mentions the two evaluators. Who were they? What qualifications did they possess to evaluate medical treatments?**

Under section 9(2)(a) of the OIA, the names of staff, below Deputy Chief Executive level, are withheld to protect the privacy of natural persons.

The EER process does not evaluate the specific subject matter of programmes being delivered by a non-university tertiary education organisations (TEOs). As part of NZQA's evaluative quality assurance framework, the process provides independent judgements on the education performance and self-assessment capability of all non-university TEOs.

EER evaluators are not subject matter experts. They are skilled in the use of evaluation tools and techniques, within the methodology designed for the EER of TEOs, to reach these judgements. You can find information about the EER process on our website: <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>.

**3. It seems very likely that there was no effort made by NZQA to assess the real value and validity of the information being imparted. I can find no evidence of this in the report. I'd like to know if you have made any attempt to inform the public and prospective students that you have not assessed the real worth of this course.**

As noted, NZQA's quality assurance processes, including the EER, do not evaluate the specific subject matter of programmes being delivered.

The EER reports published by NZQA include the key evaluative questions (KEQs) that have been considered in reaching the judgements noted together with NZQA's direct evaluative commentary. All criteria for qualification and programme approval applications are published on NZQA's website.

**4. Did you use homeopaths to assess whether the course content is valid?**

NZQA understands this question to refer to redacted 9(2)(b)(ii) (National Diploma in Homeopathy (Level 7) and the Diploma of Homeopathy (Animal Health) (Level 7) listed as focus areas for the (redacted 9(2)(b)(ii)) EER report. NZQA did not contract subject matter experts as part of the EER process.

NZQA does not contract subject matter experts to assess applications for qualifications at Levels 1-6 of the New Zealand Qualifications Framework (or Level 7 Diploma qualifications) or for programmes leading to these qualifications. Applications must demonstrate that the qualification outcomes or programme is supported by the sector.

Applications for qualification and programme approvals must include a comprehensive needs analysis and evidence of stakeholder engagement. They must demonstrate that the usefulness, relevance and value of the proposed qualification is based on a relationship to the needs of learners, employers, industry and community. The EER looks for evidence of external moderation, on-going stakeholder engagement and support for the TEO.

We hope that this answers your questions satisfactorily. If you would still like to receive copies of the documents and correspondence related to the EER report for redacted 9(2)(b) (ii) we ask that you confirm this in writing.

Please note, any clarification or amendment to a request is considered to be a new request for the purpose of calculating the maximum statutory timeframe for response – see section 15(1 AA) of the OIA.

As part of the commitment to open and transparent government, NZQA is proactively releasing responses to Official Information Act requests which are of public interest. NZQA will be publishing its response to your request on its website in December 2018. Your name and contact details will be removed before publication.

For any enquiries please contact redacted s9(2)(a), Senior Advisor, Office of the Chief Executive on redacted s9(2)(a) by email at redacted s9(2)(a)@nzqa.govt.nz.

If you are dissatisfied with our response, you also have the right, under section 28(3) of the Official Information Act 1982, to lodge a complaint with the Office of the Ombudsman, PO Box 10152, Wellington.

Yours sincerely



Karen Poutasi (Dr)  
Chief Executive