



TEC Investigation Report – Manaaki Ora Trust

Executive Summary

1. In March 2019, the Tertiary Education Commission - Te Amorangi Mātauranga Matua (TEC) undertook a scheduled audit into Manaaki Ora Trust (Manaaki Ora). The audit identified potential concerns regarding Manaaki Ora's delivery of learning hours, in particular, self-directed learning hours (SDLH) for the New Zealand Certificate in Whanau Ora (Level 4) (the Certificate) and New Zealand Diploma in Whanau Ora (Level 5) (the Diploma).
2. As a result, we initiated an investigation to verify the delivery of learning hours and monitoring that Manaaki Ora undertakes of taura learning hours.
3. In order for TEC to determine the extent of hours delivered, we triangulated Manaaki Ora and New Zealand Qualifications Authority (NZQA) programme documents, and information on the Services for Tertiary Education Organisations (STEO) website, with evidence of delivery from Manaaki Ora and taura interview responses.
4. We undertook interviews with 2019 taura, where we asked specific questions about the activities they did outside of class, which would contribute towards self-directed learning hours. The response rate from students we contacted was low, resulting in a very small sample size. The investigation assessed the estimated delivery of total learning hours for the certificate as 90% and for the Diploma as 96%.
5. TEC expects all tertiary education organisations (TEOs) to be able to evidence that 100% delivery of approved learning hours has occurred. In light of the small sample size, and in recognition of Manaaki Ora's positive engagement in the investigation and willingness to make improvements, the TEC considers that recovery of funding is not warranted.
6. During our investigation, Manaaki Ora undertook a thorough internal review of its processes and began to make improvements to ensure delivery can be appropriately evidenced. The TEC will continue to support Manaaki Ora in implementing these changes, and both parties agreed a follow-up review will occur in late 2021 to confirm efficacy of the changes made.
7. The investigation also highlighted that the programme approval documents for both the Certificate and the Diploma do not include details of all the relevant learning activities. We are working with NZQA to ensure that the programme approval documents are updated to accurately reflect the range of planned learning activities.

Background

8. The Manaaki Ora Trust is a provider of primary health and community services based in Rotorua. It has been a NZQA registered private training establishment (PTE) since 2014, and offers the following full-time TEC funded programmes through its education arm, Tipu Ora, since 2018:
 - > New Zealand Certificate in Whanau Ora (Level 4) (NZ2878)
 - > New Zealand Diploma in Whanau Ora (Level 5) (NZ2879)

9. The table below provides a breakdown of TEC funding for 2019:

Fund	2019 (\$ GST exclusive)
Investment plan	
Student Achievement Component (SAC) – Level 3 +	\$456,951
Equity Fund	\$3,448
Total	\$460,399

10. The above programmes are comprised of five three-day wānanga and nine three-day wānanga across 20 weeks and 36 weeks, respectively. The rest of the approved hours are self-directed learning hours.

Scope

11. The purpose of this investigation was to assess whether approved (and therefore funded) learning hours were being delivered. It also considered the robustness of Manaaki Ora's processes to evidence the delivery of learning hours.

12. The approach taken was to:

- > Triangulate information recorded in STEO¹, NZQA approval documents and Manaaki Ora programme documents, and compare those expectations with evidence of actual delivery, which is evidenced through programme documentation and interviews with taura,
- > Interview Manaaki Ora staff and taura who were enrolled in the programme in 2019,
- > Review Manaaki Ora's policies and procedures in relation to delivery and monitoring, specifically, how information is recorded in the PTE's systems to ensure evidence of programme delivery,
- > Review attendance records and course completion reporting.

Investigation process

13. TEC staff visited Manaaki Ora and met with the PTE Manager, its Whanau Ora kaiako and staff. We discussed the investigation process and the Whanau Ora programmes with them to gain a better understanding of its structure and delivery.

14. TEC staff looked at programme approval documents from NZQA and from the provider, and inspected evidence of delivery, including taura enrolments, attendance records and other systems Manaaki Ora had in place².

15. The Whanau Ora programmes are comprised by a significant portion of self-directed learning hours, and we engaged with Manaaki Ora seeking evidence of these occurring. Manaaki Ora staff provided copies of resources given to taura for self-directed learning, such as workbooks, readings, assessments and projects. While such activities form the basis for the SDLH included in the programme and approval documents, there was not enough evidence for Manaaki Ora to show how much time taura actually spend completing the SDLH. Consequently, our assessment of self-directed learning hours relied on interviews with taura and their assessments of how much time was spent on self-directed activities.

Incomplete programme approval documents

16. The TEC shared the findings from initial taura interviews with Manaaki Ora, which showed low delivery assessment of learning hours. Manaaki Ora staff raised concern that TEC's assessment of learning hours did not take into consideration several self-directed learning activities that were key to the Whanau Ora programmes. These activities were not described in the programme approval and other documentation that the TEC had access to, and therefore they had not been a focus of our initial taura interviews.

¹ This forms the basis for the TEC's funding of the programmes and any variance between STEO/programme approvals and what is being delivered will have potential funding consequences.

² We note that a new software was recently adopted to monitor students' online activities.

17. Consequently, the TEC sought confirmation from NZQA that these additional learning activities were part of the certificate and diploma programmes as approved by NZQA. NZQA confirmed that *such learning activities all contributed toward learning outcomes and achieving the graduate profile outcomes of the qualification for their respective programme.*
18. After engagement with Manaaki Ora and NZQA, the TEC conducted further interviews with the new information it had about self-directed learning activities, where more specific questions about the additional self-directed learning activities were asked.

Investigation findings

19. The findings below are based on interviews conducted with Manaaki Ora staff, taura and kaiako, and programme documentation. However, despite TEC's various attempts to contact taura, the response rate was low, meaning the assessments below are based on very small sample sizes.

Programme	STEO Approved Hours	Hours Delivered	% Delivered
Certificate SDL	420	400	95%
Certificate Directed	180	140	78% ³
Certificate Total	600	540	90%
Diploma SDL	900	900	100%
Diploma Directed	302	252	83% ⁴
Diploma Total	1202	1152	96%

Recognised Prior Learning (RPL)

20. When we spoke to taura, a number of them advised not having any prior experience in Whanau Ora. However, we identified a small percentage of these who were in specific employment that would likely give them some skills or knowledge that could contribute to achieving the qualification outcomes, and where this had not been recognised by Manaaki Ora on enrolment.
21. Manaaki Ora clarified that two of its taura had successfully applied for Recognition of Prior Learning, and confirmed that *it did not claim EFTS funding for the RPL component and rather, assessed the students' level of competence in the relevant unit standards of their programmes offered.* It also told the TEC that Manaaki Ora asks taura about specific prior learning undertaken.

Outcomes

22. Our investigation estimated that Manaaki Ora was delivering 90 per cent of its approved learning hours for the Certificate programme, and 96 per cent of its approved learning hours for the Diploma programme. Further, although taura interviews indicated that most self-directed learning activities were being undertaken, Manaaki Ora did not have sufficient processes in place to monitor whether taura were completing the necessary number of self-directed learning hours.

³ Manaaki Ora face to face delivery occurs once a month, and is held at marae across the country depending of the location of the course – Manaaki Ora students and staff explained that due to both taura and student travel, and marae availability, some monthly wānanga run shorter than others, however, students were always given the opportunity to catch up on hours with their tutor either online or at Manaaki Ora's office.

⁴ As above

23. The TEC reiterates that all TEOs must be able to evidence delivery of 100% of approved learning hours, including self-directed learning hours. However, our assessments rely on very small sample sizes. We also wish to acknowledge Manaaki Ora's willingness to engage with the investigation process, and proactively make improvements. In light of these factors, the TEC does not consider that a funding recovery is warranted in this instance.
24. During our investigation, Manaaki Ora undertook a thorough internal review of its processes and began to make improvements to ensure delivery can be appropriately evidenced in the future. The TEC will continue to support Manaaki Ora in implementing these changes, and both parties agreed a follow-up review will occur in late 2021 to confirm efficacy of the changes made.
25. The investigation also highlighted that the programme approval documents for both the New Zealand Certificate in Whanau Ora (Level 4) and the New Zealand Diploma in Whanau Ora (Level 5) do not include details of all the relevant learning activities. As a result, we are working with NZQA to ensure that the programme approval documents are updated to accurately reflect the range of planned learning activities that make up each programme.
26. Finally, the TEC would like to once again acknowledge Manaaki Ora's commitment to this process, and the partnership approach that has led to the resolution of the issues identified.