External Evaluation and Review Report

Eagle Flight Training Limited

Date of report: 14 February 2019

About Eagle Flight Training Limited

Eagle Flight Training is a small flying school providing aviation training solely to international students. The school has changed ownership and moved from Ardmore to Gisborne Airport since the previous EER.

Type of organisation:	Private training establishment (PTE)
Location:	18 Aerodrome Road, Gisborne
Code of Practice signatory:	Yes
Number of students:	International: 17 equivalent full-time students (EFTS) were enrolled at the time of the on-site visit; 13 EFTS reported to NZQA in 2017
Number of staff:	Nine staff, including six part and full-time flight instructors
TEO profile:	See: NZQA – Eagle Flight Training Limited
	The certification and operation of organisations conducting aviation training and assessments in New Zealand is overseen by the Civil Aviation Authority of New Zealand (CAA). Pilot licences are issued by CAA. Eagle Flight has agreements with the aviation authorities in Vietnam, and with two Vietnamese airlines providing formal recognition of their training.
	At Eagle Flight's previous external evaluation and review (EER), NZQA was Highly Confident in the PTE's educational performance and Highly Confident in its capability in self-assessment.
Scope of evaluation:	Flight training (encompassing all training scheme delivery); and international students' support and wellbeing.
MoE number:	7806
NZQA reference:	C32308
Dates of EER visit:	13 and 14 November 2018

Summary of Results

Eagle Flight Training continues to meet CAA requirements. However, the school has weaknesses in some important areas of self-assessment, including management of the Code of Practice.[1]

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

- Eagle Flight has the confidence and support of its main stakeholders, including CAA, two overseas airlines and local authorities.

- Eagle Flight's move from Ardmore to Gisborne has led to a better environment for flight instruction and a reported increase in flying hours by students.

- Students are being trained to fly and pass the required external tests. The rate at which this is occurring is difficult to determine as records of the student journey from pre-enrolment to graduation are variable in quality, and achievement data is not used effectively.

- Some graduates progress to employment as pilots but there is limited documentation of this.

- Eagle Flight's self-assessment is weak in relation to student progress, achievement and outcomes. There are also deficiencies in effectively managing responsibilities under the Code of Practice.

---

[1] Education (Pastoral Care of International Students) Code of Practice 2016

Key evaluation question findings[2]

1.1 How well do students achieve?	
Performance:	**Marginal**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Eagle Flight claims a 'high success rate' for its students. The PTE states that 'from June 2015 to date, of 168 exams passed, 107 (64 per cent) were passed at first attempt; 40 (23 per cent) were passed at 2nd attempt. This means that 87 per cent of subjects sat were passed on 1st or 2nd attempt'. More recent pass rate information shows that students continue to pass exams. The company managing the online theory exams provides regular data on national pass rates, and Eagle Flight uses this to benchmark student performance.[3] In support of this information, a table was provided containing a list of 22 students and a date for the various exams. This was supplemented with a narrative in Eagle Flight's self-assessment summary, but this did not clearly align with the table in student numbers, dates or percentage pass rates. The evaluators were unable to obtain evidence on site showing analysis of data, information about every student enrolled, or how data is used to monitor and improve student achievement. There is a lack of clarity around student achievement. Anecdotal evidence suggests that achievement was weak before relocation to Gisborne. Students said things had now improved. Data presentation for this evaluation was weak. Attempts to gain a more detailed and comprehensive year-on-year picture of achievement were unsuccessful.
Conclusion:	Overall, achievement was difficult to firmly establish due to variability in maintaining and using student enrolment, progress and achievement data.

---

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

[3] Aviation Services Limited administers and delivers exams and practical assessments in New Zealand under delegation from CAA.

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

Performance:	**Marginal**
Self-assessment:	**Marginal**
Findings and supporting evidence:	The main valued outcome sought by the students is employment as a trainee airline pilot in their own country. Some graduates do progress to employment as pilots, but there is very limited documented evidence of graduate employment. Passing the various levels of CAA certification is also valued by the students, as is improving their English language capability within the specialised context of interacting with a control tower and other aircraft. There is credible evidence that this occurs. CAA-sanctioned training is also recognised in Vietnam where numerous Eagle Flight students come from. Generalised claims and some testimonials of graduate outcomes were provided in self-assessment. Attempts to gain a more detailed year-on-year picture of outcomes were unsuccessful. Student interviews yielded some positive information about graduates being employed as pilots, particularly in Vietnam. Some records of these outcomes were also provided on site, but they were not comprehensive and did not cover the period since the previous EER.
Conclusion:	Overall, evidence of valued outcomes was difficult to firmly establish due to the PTE's variability in gathering, maintaining and using outcomes data effectively. Given the high cost of flight training, it is reasonable to expect that Eagle Flight would maintain accurate and comprehensive information on the employment outcomes of graduates. Currently it does not.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	The flight training programmes are designed and delivered in a way that meets the learning needs of trainee pilots, preparing them for CAA theory tests and practical exams. In general terms, the flight instruction and theory lessons are individualised and student-centred and involve a combination of self-study and instructor-guided training. The facilities, aircraft, trainer qualifications and learning resources are recognised by CAA as being suitable for their purpose. Records of each student's progress are maintained and overall co-ordination of all aspects of training has improved significantly over the last year. Students who had studied at both Ardmore and Gisborne said there had been an improvement. This remains an area to strengthen further. The quality and comprehensiveness of student records is variable. Tests are conducted online and students are soon provided with results, which are discussed with them. All theory and practical tests are conducted independently by Aviation Services Limited, under licence to CAA. Additional instruction is provided as needed, although records of this were unfocused and there was little evidence of how each student is guided and supported in their learning. Recent monitoring and audit checks by CAA confirm that an appropriate curriculum and flight protocols are being followed. Internal auditing has also been strengthened, with excellent records of both the process and the way findings are used.
Conclusion:	Students are trained to fly by suitably qualified instructors and are proceeding through the levels of training at improved rates. CAA quality assurance and internal quality assurance processes are used to monitor and confirm this.

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

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Eagle Flight accepts new students on a weekly basis. Training involves a significant proportion of direct trainer instruction and self-directed study compared with class time. New students are inducted and provided with a course handbook. Students who leave have an exit interview. A local school teacher has been employed part-time to assist students with English language tuition. As noted under 1.3, evidence of how each student is guided and supported in their learning is limited, which affects the PTE's ability to carry out effective self-assessment.

Student interviews gave a positive view of students feeling supported, enjoying their training, and interacting well with staff and peers. Eagle Flight says there have been no complaints recorded, although students said they were unhappy with the residential hostel organised for them in Gisborne. This facility is no longer used, and students are in various rental situations. It is unclear how much oversight Eagle Flight has over the suitability of these arrangements or any risks.

Eagle Flight management and instructors have a focus on safety and professional competence. This is constantly reinforced to students. No serious incidents have been recorded during the PTE's operations from Gisborne Airport.

The quality and comprehensiveness of student records is variable. A sample of records sighted indicated some degree of frustration by instructors with some students not passing tests and being absent from training. The lack of clear and effective Code of Practice management and related comprehensive self-assessment raises questions about how well reluctant, stressed or truanting students are supported or counselled. |
| Conclusion: | Guidance and support is suitable in terms of supporting the students to undertake their training. Records suggest that self-assessment is limited to monitoring rather than identifying and understanding key success factors. |

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

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Eagle Flight has moved its training operation from Ardmore to Gisborne since the previous EER. This has led to better conditions for flight instruction and an increase in flight-hours by students. The planning, stakeholder consultation and accomplishment of this move was the strongest example of fully documented self-assessment available to the evaluators.

Eagle Flight has the confidence and support of its main stakeholders, including CAA, Gisborne Airport and the Eastland Community Trust, who assisted materially with the PTE's relocation.

There is little documentation showing how governance and management operates at Eagle Flight. Formal agreements with two overseas airlines are in place. The core quality assurance documentation relating to operating a flight school is in place.[4] This has been subject to recent quality assurance review, both internally by the quality assurance manager and externally by CAA. These audits, and any information relating to student achievement, are presented to a regular, minuted academic board meeting for consideration.

At the time of the on-site visit, the new leadership team at Eagle Flight was working through various data sources to better understand each student's progress and plan what needs to be done to ensure successful progress through the training.[5] |
| Conclusion: | Eagle Flight has been through major changes, including a change of ownership and location. There have been staff changes in management roles. Although this has been reasonably well managed, weaknesses in self-assessment are numerous, serious and need urgent improvement. |

---

[4] Known as 'The Exposition' set of documents and procedures.

[5] Leadership team: chief executive officer/head of training, quality assurance manager and chief flying instructor.

1.6 How effectively are important compliance accountabilities managed?

Performance:	**Marginal**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Eagle Flight continues to offer approved training schemes. The evaluators found it difficult to confirm the hours of delivery due to the wide variances in individual student's progress and the patchy records of that progress. Nomenclature issues were also apparent, with letters of offer and other records of study using various titles that were not clearly aligned with training scheme titles. An audit of student files showed variability in information management. For example, confirmation that some students held insurance had to be sought directly from the student as the records were not current. It was not readily apparent that NZQA Rule 18 English proficiency requirements were being met in all cases. Although Eagle Flight had communicated to NZQA, as required, that a Code of Practice review had occurred, the review document was cursory, incomplete and lacked focus on the intended outcomes. Knowledge of the code by staff and the staff member charged with overseeing pastoral care[6] was limited. None of the staff had any specific professional development in Code of Practice matters. The certification and operation of organisations conducting aviation training and assessments in New Zealand is prescribed under Civil Aviation Rules governed by CAA. Eagle Flight Training was audited by CAA in 2018. There were no particular concerns and the recommended actions are occurring.
Conclusion:	Currently, Eagle Flight is managing CAA requirements well but is not meeting NZQA expectations, in particular around administration and review of the Code of Practice.

---

[6] The business development manager

Focus Areas

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

2.1 Focus area: Flight Training (encompassing all training scheme delivery)

Performance:	**Marginal**
Self-assessment:	**Marginal**

2.2 Focus area: International Students: Support and Wellbeing

Performance:	**Marginal**
Self-assessment:	**Marginal**

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 Eagle Flight Training Limited:

- Establish a process for gathering, analysing and reporting reliable data on students' achievement and outcomes. These should be used as a baseline on which to internally monitor changes and improvements to achievement and outcomes. The records should provide a readily accessible and credible source of evidence, both internally and for NZQA.

- Rebuild internal capability to manage responsibilities under the Code of Practice, including ensuring that at least one staff member receives external training in this role and then establishes an appropriate pastoral care monitoring and review system.

- Use NZQA-approved training scheme (programme) titles in all documentation to avoid confusion and to enable more clarity around what each student is studying.

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 Eagle Flight Training Limited to:

1. Maintain educational records of student progress and achievement to provide a readily accessible and credible source of evidence that the training schemes are being delivered as approved. This relates to Criteria 1 and 6 of the Training Scheme Rules 2012 (v3-2018).

2. Conduct a full self-review of performance against the required outcomes and processes set out in the Code of Practice and make a fresh attestation to NZQA about the completion of this self-review. This relates to the ongoing responsibilities of signatories to the Education (Pastoral Care of International Students) Code of Practice 2016.

3. Ensure student files contain evidence of English proficiency and insurance. This relates to Registration Rules (such as 4.1) and Rule 18.

Appendix

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-eer/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.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process: http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/. *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 fraud[7]*

- *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.*

---

[7] 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 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/.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz