

External Evaluation and Review Report

Enfield Holdings Ltd trading as Mainland Aviation College

Date of report: 4 March 2025

About Enfield Holdings Ltd trading as Mainland Aviation College

Enfield Holdings Ltd trading as Mainland Aviation College (hereafter Mainland Aviation College) is a Dunedin-based PTE which delivers a range of aviation training to international students. This training includes the NZQA-approved Level 5 Diploma in Aviation and the CAA-approved Private Pilot Licence (PPL) and Commercial Pilot Licence (CPL) which sit within the Level 5 Diploma in Aviation.

Type of organisation: Private training establishment (PTE)

Location: Airport Drive, Waihola, Dunedin

Eligible to enrol Yes

international students:

Number of students: Domestic: 39 students (39 equivalent full-time

students)

International: 39 equivalent full-time students (all

Indian students)

Number of staff: Eight full-time staff, one part-time staff

TEO profile: See: Enfield Holdings t/a Mainland Aviation College

Last EER outcome: At the last external evaluation and review in 2023,

Mainland Aviation College was found to be Not Yet Confident in educational performance and Not Yet

Confident in capability in self-assessment.

Scope of evaluation: • International Students: Support and Wellbeing

 Diploma in Aviation (Aeroplane) (General Aviation) (Level 5) ID: 116113-2 leading to

qualification 3688-11

MoE number: 7187

NZQA reference: C58893

Dates of EER visit: 20-22 August 2024

¹ For brevity, hereafter this qualification will be referred to as the Level 5 Diploma in Aviation.

Summary of results

Training leading to the internationally recognised PPL and CPL licences is highly relevant to Mainland Aviation College's students, graduates and stakeholders. They highly value gaining the licences, and student achievement relating to these licences has improved over time. Improvements to enrolment record management and student management systems have contributed to improvements in the identification and review of all areas of priority need.

Confident in educational performance

Confident in capability in self-assessment

- Students train in a range of flight conditions and environments, and this important feature of the training is valued by external stakeholders. The attainment of PPL and CPL licences is valued highly by students and graduates, though the quality of self-assessment data regarding graduate feedback and outcomes could be further improved. Student achievement has improved over time and falls within the range of 'average' to 'high-average' relative to the aviation training sector.
- Achievement-related self-assessment has improved as a result of the PTE's new student management system, though room for improvement remains in regard to the tracking of progress across bi-yearly educational reviews.
- Training leading to the PPL and CPL licences is highly relevant to the students, graduates and employers. Students still exit study before completing the Level 5 Diploma in Aviation, but the PTE has reviewed the reasons for noncompletion effectively. The organisation is engaging with NZQA and other important stakeholders to develop future training pathways.
- Learning environments are mostly effective in meeting the needs of the students, though student concerns were raised regarding the adequacy of classrooms and other facilities. Learning activities, training materials and

teaching are effective in meeting the needs of different students, and in preparing students for their external assessments.

- Mainland Aviation College supports the students well in their learning, though there are limitations regarding the PTE's self-assessment in this area. Learning goals are well understood, the provision of important information to students is effective, and responses to the wellbeing of students are appropriate. Student voice is an area for improvement, and it is important that the PTE continues to develop its student voice representation and feedback systems.
- Management has been effective in allocating resources to support learning, teaching and educational achievement under challenging circumstances. Organisational purpose and direction are clear, and indications of organisational progress are present. Recruitment and development of staff is generally effective. Development of staff capability specific to adult education and literacy teaching is occurring, but could be implemented more widely across instructors within the organisation.
- Systems for reporting unit standard credit results and for record-keeping regarding student entry requirements are effective. These systems are also much improved since the previous EER.
 Systems for record-keeping of international student details are somewhat effective, though the international student file audit found an instance of non-compliance regarding insurance. The management of some other important compliance accountabilities is effective, though Code of Practice² publication requirements remain to be addressed.

² The Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021

Key evaluation question findings³

1.1 How well do students achieve?

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	The management and instructor teams both highlighted Mainland Aviation College's Dunedin-based location as a distinctive and valuable feature of the PTE. This location provides students with the opportunity to fly in a range of different conditions and environments – including the mountainous terrain of nearby areas. Challenging conditions of ice, rain and wind set students up to fly anywhere in the world.
	The Private Pilot Licence (PPL) and Commercial Pilot Licence (CPL) are internationally recognised licences which are components of the Level 5 Diploma in Aviation. Attainment of these licences is valued highly by Mainland Aviation College's students – most of whom travel from India to enrol at the PTE. Students reported to the evaluation team that they saw Mainland Aviation College as a good option in which to complete their CPL, prior to enrolling at the PTE.
	Graduates also value gaining their PPL and CPL licences. The PTE provided a range of positive testimonials from former graduates who have since commenced employment in commercial pilot roles after completing their training at Mainland Aviation College. While the testimonials presented were positive, some did not contain dates, and some related to students who graduated prior to the previous EER. This indicates that the relevant evidence varies in terms of quality. Mainland Aviation College could therefore consider ways of

³ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

improving its collation and analysis of graduate feedback, and its understanding of graduate destination outcomes.

Student achievement has improved since the previous EER. Additionally, ASPEQ⁴ reported that the PTE's student achievement falls within the range of 'average' to 'high-average' relative to the sector. For July-December 2022 and January-June 2023, the PTE's first-time pass percentage⁵ fell below the national average in several PPL and CPL subjects.⁶

For July-December 2023, however, the first-time pass percentage was near or above the national average for four PPL subjects, and below the national average for only one remaining subject. During the same time period, the PTE's first-time pass percentage for all six CPL subjects was above or near the national average.

The procurement of a new student management system has led to some improvements in achievement-related self-assessment. This system records live data on attendances, logbook assessments and average marks, and these data form the basis of the PTE's tracking of student progress. Student progress is tracked and analysed effectively, with instructors forming individualised plans for each student, and with the chief flying instructor checking in with each student to discuss their plan.

Mainland Aviation College continues to use bi-yearly educational performance reviews to collate data on achievement-related topics. The PTE has provided some evidence that it is assessing progress against previous reviews, though there is room for further improvement in this area. For each particular review, the PTE could consider including comparisons of its achievement data against earlier reviews, to identify more clearly the

⁴ ASPEQ is a New Zealand company delegated and contracted to provide assessment services for New Zealand's Civil Aviation Authority (CAA).

⁵ First-time pass percentages are an important indicator of student achievement and quality of instruction in aviation training.

⁶ See Appendix 1 for further detail; this contains achievement data from bi-yearly educational reviews that correspond to the time periods noted in the main text.

	developments that have been made over time as well as the areas that require attention.
Conclusion:	Students train in a range of flight conditions and environments. Graduates gain PPL and CPL licences which are highly valued, and which enable a pathway to employment in the aviation industry. The quality of self-assessment of data regarding graduate feedback and outcomes could be further improved. Student achievement has improved over time. Achievement-related self-assessment has improved as a result of the PTE's new student management system.

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:	Mainland Aviation College's training offerings are mostly relevant to students, graduates and other important stakeholders. As indicated in 1.1 and 1.2, training leading to the PPL and CPL licences is highly valued by the students, graduates and employers, and the attainment of these licences provides a pathway to relevant employment. Regarding the Level 5 Diploma in Aviation, however, most students leave Mainland Aviation College after completing the PPL and CPL licences and before completing the full qualification. ⁷
	To the extent that it is able, Mainland Aviation College reviews its training offerings effectively, based on student, graduate and stakeholder needs. The PTE reviewed the Level 5 Diploma in Aviation to understand the persistently low completion rate for this qualification, and it identified a range of reasons for non-completion. One important reason is that completion of the full qualification is superfluous to the gaining of employment for many students, since the minimum requirement for gaining employment in India is completion of a CPL. A further

⁷ See Appendix 1 for completion data regarding each offering.

important reason is that many students face pressure to finish their studies as quickly as possible, given the time required for licences to be converted and thereafter recognised in India.

Mainland Aviation College also participates in formal conversations with NZQA, Ringa Hora Workforce Development Council (WDC) and other aviation providers, on the development of future training pathways for students across the aviation sector.

Mainland Aviation College's learning environments are mostly effective in meeting the needs of the students. As indicated in 1.1 and 1.2, students train in a range of flight conditions and environments, which is beneficial for their development as pilots. However, students reported to the evaluation team that the quality of the classrooms and other facilities was sometimes inadequate, particularly in terms of the amount of space available during busy periods. External stakeholders also indicated that Mainland Aviation College's classroom facilities could be further improved. In response to these findings, Mainland Aviation College's management expressed an intention to address the concerns raised by the students, and it is important that the PTE addresses these concerns.

Mainland Aviation College's learning activities, training materials and teaching are effective in meeting the needs of different students, and in preparing students for their external assessments.⁸ Instructors draw on several methods in delivering their training, including PowerPoint presentations, videos, as well as weekly quizzes. Students reported to the evaluation team that they found the range of delivery methods useful. Students also reported that their instructors provided useful formative feedback and helpful guidance on theoretical and practical aspects of their training.

⁸ Aside from mock tests, students do not complete assessments that are administrated by Mainland Aviation College. As indicated in footnote 3 above, the company ASPEQ is delegated and contracted to provide assessment services for New Zealand's Civil Aviation Authority (CAA). This company administers examinations and assessments for all aviation training providers in New Zealand and is responsible for moderation, assessment design, assessment-related academic integrity and other related activities that would typically fall within the purview of providers.

Conclusion:	Training leading to the PPL and CPL licences is very relevant to the students, graduates and employers. While qualification completions remain low, the PTE has reviewed the reasons for non-completion effectively. Student concerns were raised regarding the adequacy of classrooms and other facilities. Learning environments, activities, training materials and teaching are otherwise

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

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	Mainland Aviation College has a good understanding of the learning goals of its students, and the PTE's provision of important study information to the students is effective. As indicated in 1.1. and 1.2, the main goal of most students is to gain their CPL licence and commence their careers as commercial airline pilots. Additionally, Mainland Aviation College's student handbook sets clear expectations for students regarding conduct, and communicates important information regarding matters including classes, facilities, instructors and student support.
	Mainland Aviation College responds to the wellbeing needs of students in an effective manner. Evaluative discussions with students and external stakeholders indicated that students receive individual care and attention during their studies. Evaluative conversations with management – and safety management system data sighted by the evaluation team – indicate that the PTE responds to critical incidents appropriately.
	There is no student representative system or social activity programme at Mainland Aviation College. More generally, student voice is an area for improvement. Mainland Aviation College does collate its overall survey results for student satisfaction for each six-month period, in its biyearly educational reviews. However, the range of responses in these reviews is limited, and the quality of the PTE's analysis is variable. For example, the review for July-

	December 2022 returned only one survey response. Additionally, the bi-yearly review for July-December 2023 replicated the very same student concerns and the very same PTE responses to those concerns that appeared in its bi-yearly review for January-June 2023. In its review of the Code of Practice, Mainland Aviation College has rated its performance regarding student voice as a 'work-in-progress'. The PTE says it is working to develop its student voice representation and feedback systems. It is important that Mainland Aviation College continues to develop these systems in future. Consideration of attendance at NZQA Code workshops may be beneficial in this regard.
Conclusion:	Mainland Aviation College's students are effectively supported and involved in their learning. Learning goals are well understood, the provision of important information to students is effective, and responses to the wellbeing needs of students are appropriate. Student voice is an area for improvement. There are limitations regarding the PTE's student support-related self-assessment.

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

Performance:	Good
Self-assessment:	Good
Findings and supporting evidence:	Since the previous EER, Mainland Aviation College has faced a challenging environment brought about by the prolonged impact of border closures. In response, the PTE has been effective in allocating resources to maintain learning, teaching and educational achievement. The PTE has taken decisions to support the sustainability of its business model. The PTE has also sourced additional aircraft to increase flight opportunities for the students, following informal feedback from students on the availability of flights.
	Mainland Aviation College's purpose and direction are clear. The PTE aims to provide an exceptional standard of aviation education. The PTE also aims to expand its student enrolment and improve pass rates for its PPL and

CPL licences. Mainland Aviation College has outlined appropriate strategic objectives in support of these aims. Indications of organisational progress include the improvements in student achievement noted in 1.1 and 1.2.

Mainland Aviation College's recruitment and development of staff is generally effective. The PTE's bi-yearly educational reviews provide an assessment of staff qualifications at six-monthly intervals. These note changes in staff and updates in staff development activities that have taken place. Additionally, the chief executive and chief flying instructor frequently attend CAA safety seminars and aviation industry conferences, and a key external stakeholder noted that this is a valuable feature of the PTE. External consultancy has also added value to the PTE since the previous EER.

Mainland Aviation College maintains that CAA-accredited instructor courses contain adult education components. Since the previous EER, one instructor has participated in training relating to adult education and/or adult literacy teaching capability. However, evidence of demonstrable progress across all instructors remains limited. Given that the PTE enrols many students for whom English is not their primary language, a lift in focus here is required. Consideration of adult education workshops may be beneficial.

Conclusion:

Management has been effective in allocating resources to maintain delivery of training under challenging circumstances. The PTE's purpose and direction are clear, and indications of organisational progress are present. Recruitment and development of staff is generally effective. Development of staff capability specific to adult education and literacy is occurring but could be implemented more widely across instructors within the organisation.

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	Mainland Aviation College's new student management system has led to improvements in the PTE's management of some important compliance accountabilities. In addition to providing live data which forms the basis for tracking student progress, this system also enables the PTE to collect, verify and report unit standard results to NZQA. Unit standard credit reporting results indicate that the new system is highly effective. For 2023 and 2024, the percentages of unit standard results reported beyond the required 90-day timeframe were 9 per cent and 1 per cent respectively. These results are a significant improvement from 2022, in which 75 per cent of Mainland Aviation College's unit standard results were reported after the relevant timeframe.
	Mainland Aviation College has implemented a new enrolment record management system to support the PTE's retention of data pertaining to the meeting of programme entry requirements by the students. The international student file audit carried out during the evaluation indicated that this system is effective regarding programme entry requirements, which indicates improvement in this area. Sampling of relevant documents indicated that Mainland Aviation College's students meet these requirements, and that the PTE collates the corresponding data effectively.
	Mainland Aviation College's new enrolment record management system aims to retain accurate and up-to-date details for every student regarding visas, agents, health and travel insurances, student fee protection trust records and passport numbers.
	The international student file audit indicated that this system is effective regarding the retention and accuracy of most relevant details, which indicates some improvement since the previous EER. However, the audit also found an instance of non-compliance regarding the meeting of insurance requirements. Sampling of relevant documents indicated that a Mainland Aviation College student

remained uninsured for one day during their candidature before purchasing a new policy. This is in breach of Clause 44(1)(a) of the Code, and it is important that the PTE continues to strengthen its processes in this area to ensure that further breaches do not occur.

Mainland Aviation College's management of other important compliance accountabilities is mostly effective, as indicated by:

- Renewal of the PTE's Part 119 Air Operator Certification by the CAA.
- Renewal of the PTE's Part 141 Aviation Training Organisations Certification by the CAA.
- Submission of attestations and returns to NZQA within expected timeframes.

However, the PTE has yet to publish on its website a copy of its Code of Practice self-review, a record of the number and nature of complaints, or a record of critical incidents. It is important that the PTE meets these requirements, in line with Clauses 9(c), 13(f)(i), and 10(3)(g) of the Code.

Conclusion:

Systems for reporting unit standard credit results and systems for record-keeping regarding student entry requirements are both effective. These systems are also much improved since the previous EER. Systems for record-keeping regarding international student details are somewhat effective, though the international student file audit found an instance of non-compliance regarding insurance. The management of some other important compliance accountabilities is effective, though Code publication requirements remain to be addressed.

Focus areas

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

2.1 International Students: Support and Wellbeing

Performance:	Good
Self-assessment:	Marginal

2.2 Diploma in Aviation (Aeroplane) (General Aviation) (Level 5) ID: 116113-2

Performance:	Good
Self-assessment:	Marginal
Findings and supporting evidence:	The overall completion rate for the Level 5 Diploma in Aviation is 2 per cent, with one completion, six withdrawals, and 58 non-completions since the previous EER. However, it is also worth noting that two components of the Level 5 Diploma in Aviation valued highly by students and graduates – the PPL and CPL – have much higher completion rates than the overall diploma.
	Since the previous EER in 2023, the PTE's completion rate for the PPL was 71 per cent, with 24 completions, five withdrawals and five non-completions. The PTE's completion rate for the CPL was 92 per cent, with 22 completions, one withdrawal and one non-completion.
	(See 1.1 and 1.2 for further detail on other indicators of student achievement relating to the PPL and CPL licences. See 1.3 for further detail on Mainland Aviation College's programme review activities relating to the Level 5 Diploma in Aviation.)
Conclusion:	Completions for the Level 5 Diploma in Aviation remain persistently low, though completions for important components of this diploma – the PPL and CPL – are much higher. Other measures of student achievement indicate improvement over time regarding the PPL and CPL. Programme review activities regarding the Level 5 Diploma in Aviation indicate that Mainland Aviation College understands the reasons for non-completion and is

contributing to the development of future study pathways for the students.

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 Enfield Holdings trading as Mainland Aviation College Limited:

- Consider ways of improving collation and analysis of graduate feedback, and the PTE's understanding of graduate destination outcomes.
- Consider including comparisons of bi-yearly achievement data against corresponding data from earlier reviews, to identify more clearly the developments that have been made over time as well as the areas that require attention.
- Continue to address student concerns regarding the availability of study areas during busy periods.
- Continue to develop student voice representation and feedback systems.
- Continue improving instructor capability regarding adult education and literacy teaching, particularly as this relates to the teaching of students for whom English is not their primary language.

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.

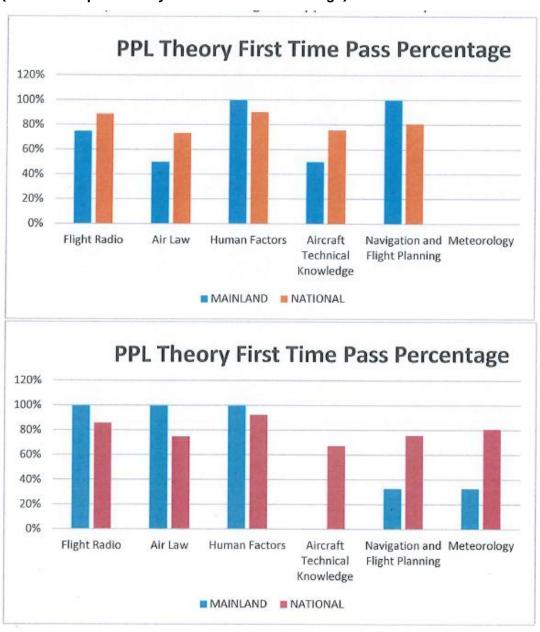
NZQA requires Enfield Holdings trading as Mainland Aviation College Limited to:

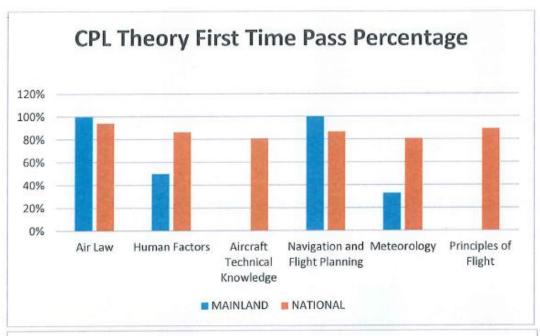
 Ensure practices are in place to confirm students have appropriate insurance, in line with Clause 44(1)(a)-(d) of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021.

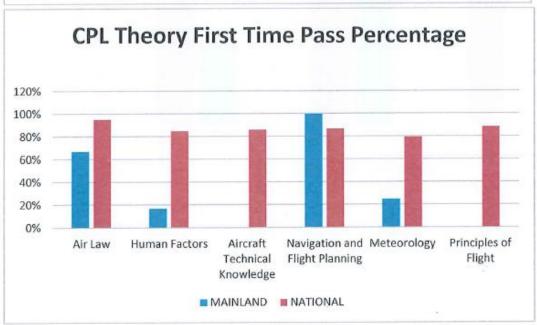
- Make available to students, staff and the general public including on their websites (where available) – self-review reports on the quality of student wellbeing and safety practices, as required by Clause 9(c) of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021.
- Report annually to the Code administrator (including on provider websites where available) on the number and nature of complaints made and their outcomes, as required by Clause 13(f)(i) of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021.
- Report annually to the Code administrator (including on provider websites where available) on the number and nature of critical incidents and their outcomes, as required by Clause 10(3)(g) of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021.

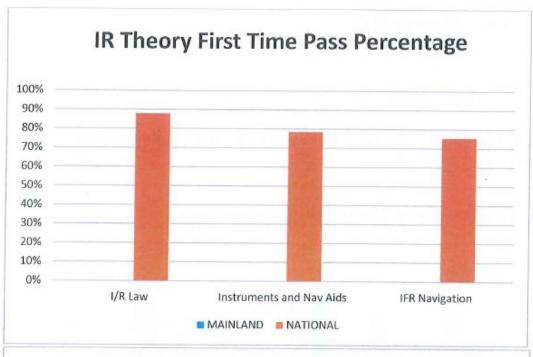
Appendix 1

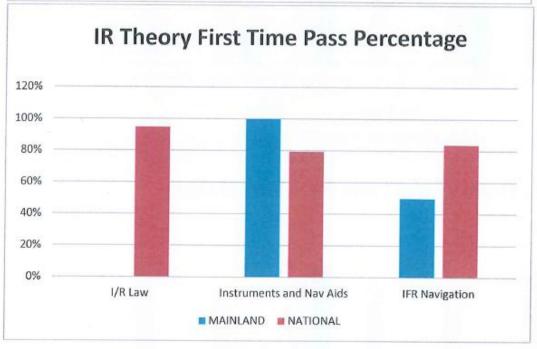
Table 1. July-December 2022 bi-yearly review first-time pass percentage results (information provided by Mainland Aviation College)

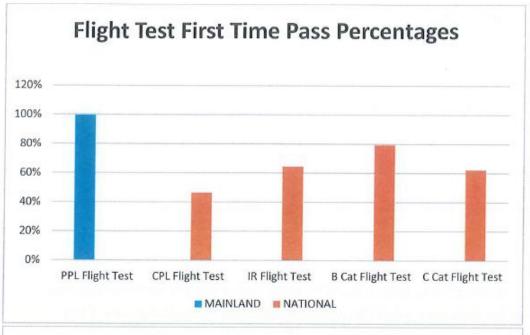












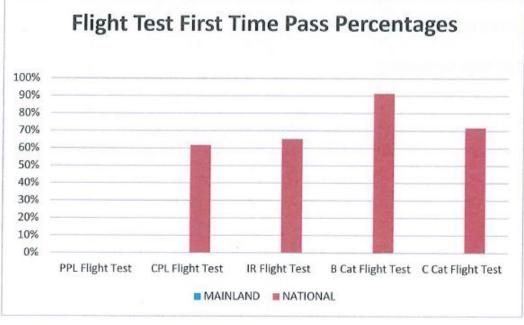
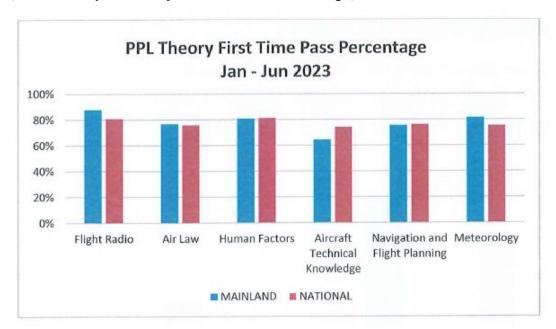
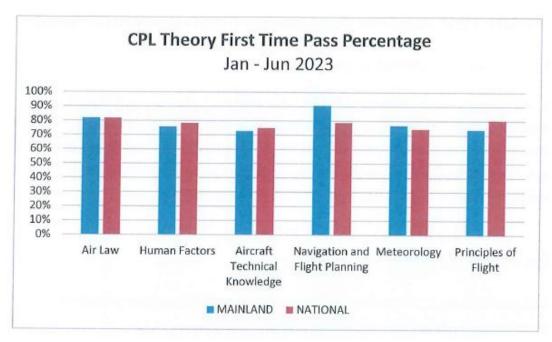
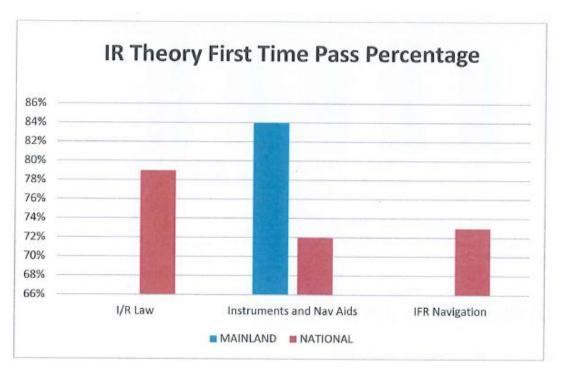


Table 2. January-July 2023 bi-yearly review first-time pass percentage results (information provided by Mainland Aviation College)







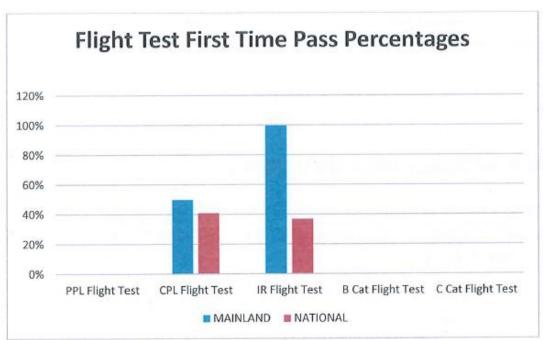
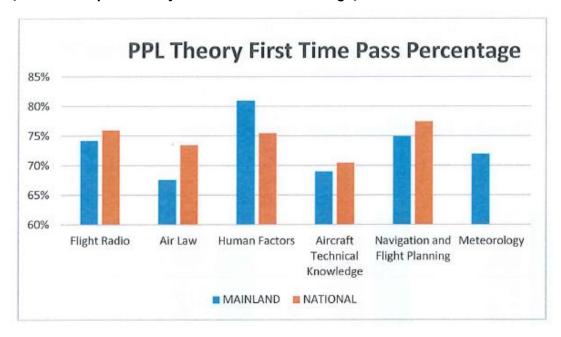
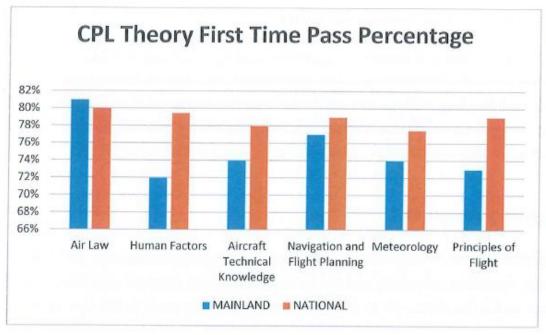
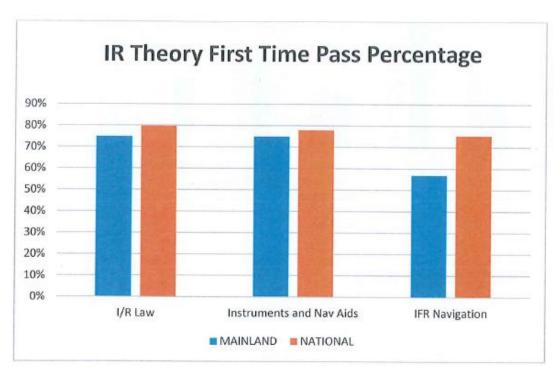


Table 3. July-December 2023 bi-yearly review first-time pass percentage results (information provided by Mainland Aviation College)







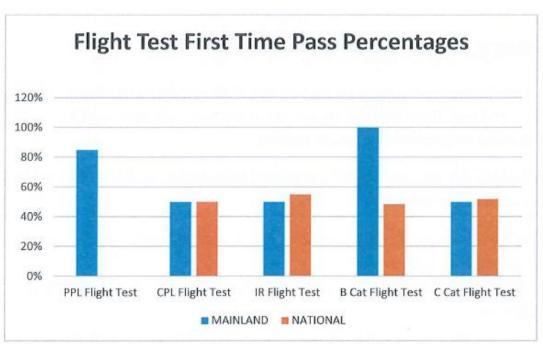


Table 4. Completion data for each of Mainland Aviation College's training offerings (data provided by Mainland Aviation College)

	Enrolled	Completed	Withdrawn	Did Not Complete	In progress	Completion Rate
116113-2 Diploma in Aviation (Aeroplane) (General Aviation) (Level 5)	66	1	6	58	1	2%
Private Pilot's Licence (PPL)	66	24	5	5	32	71%
Instrument Rating (IR)	4	3	1	1	0	60%
Instructor Rating (C-Cat)	2	1	1	1	0	33%
Commercial Pilot's Licence (CPL)	61	22	1	1	37	92%
High performance Type Ratings	5	5	0	0	0	100%

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

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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