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Report of External Evaluation and Review

Foundation English Limited

Confident in educational performance

Confident in capability in self-assessment

Date of report: 1 May 2020

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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:	Foundation English Limited
Type:	Private training establishment (PTE)
First registered:	2002
Location:	20 Hobson Street, Auckland
Delivery sites:	Swanson Towers, 20 Hobson Street, Auckland 289 Tuam Street, Christchurch Durham Court, 144-146 Durham Street, Tauranga (a new site from 2018, yet to enrol students)
Courses currently delivered:	<ul style="list-style-type: none">• General English• General English plus IELTS¹ Preparation
Code of Practice signatory:	Yes
Number of students:	At 3 April 2018, 332 international students (269 Auckland; 63 Christchurch) and seven domestic students were enrolled with Foundation English. Enrolments for the 2017 year were 1158 international students and 82 domestic students. International students come from many countries, with the largest segments being Korea at 18 per cent, Japan 15 per cent, Thailand 14 per cent, and Latin America 20 per cent.

¹ International English Language Testing System

Number of staff:	<p>Foundation English has a head of faculty and two faculty support staff as well as 25 teaching staff (18 permanent part-time; five fixed-term; two casual).</p> <p>Foundation English is also supported by full-time Aspire2 International staff across management, registry, student experience and other roles.</p>
Scope of active accreditation:	<p>http://www.nzqa.govt.nz/providers/course-accreditations.do?providerId=749117001&delSiteInd=0</p>
Distinctive characteristics:	<p>The school focus is solely on English language tuition.</p>
Recent significant changes:	<p>At the time of the last external evaluation and review (EER) in 2014, Foundation English was delivering an Intensive Literacy and Numeracy (English for Speakers of Other Languages) programme part-time to approximately 100 new migrants annually. This was their only delivery. There were no international students.</p> <p>In 2015 the Australian-based Aspire2 Group purchased a number of Auckland-based PTEs to form Aspire2 International.² Foundation English was selected as the PTE responsible for delivering English language programmes within Aspire2 International (including those of the former Concordia Institute of Business Limited). The head of faculty, who has primary managerial and educational responsibility at Foundation English, was promoted to the role in 2017.</p> <p>In 2017, Foundation English moved their remaining learners to the Hobson Street site from Queen Street, which ceased operation in October 2017.</p>
Previous quality assurance history:	<p>At the previous EER in 2014, NZQA was Highly Confident in both the educational performance and capability in self-assessment of Foundation English.</p> <p>Aspire2 merged Foundation English with another PTE,</p>

² Aspire2 International is a brand name and not a legal entity.

Concordia Institute of Business, also a Category 1 provider.

The TEC conducted an audit in October 2017 in relation to Intensive Literacy and Numeracy funding. The audit found that: audit trails were incomplete and could not confirm that all learners were eligible to enrol according to the eligibility criteria in the funding conditions letter; funding had been claimed for one ineligible learner; there were discrepancies with some records concerning the recording of attendance and hours claimed from the TEC; there were no offer of placement letters that recorded start and expected finish dates, hours of expected attendance and whether the enrolment was full or part-time. The TEC noted that following a review of the policies and procedures by the PTE, 'the systems now in place to record contact hours have addressed [these] compliance issues'.

Other: The PTE is an approved TOEIC³ test centre and maintains involvement with the NZCEL Providers' Forum. Five staff have TESOLANZ⁴ registration.

2. Scope of external evaluation and review

Three focus areas were selected for this evaluation:

- **General English** (comprising the various options students choose to create a programme of study) was selected as it is the main programme in which students enrol.
- **International student support and wellbeing** was included because most of the students at Foundation English are international students and the school is a signatory to the Education (Pastoral Care of International Students) Code of Practice.
- **Transformational change management/legacy issues managed** was included by mutual agreement between NZQA and Aspire2 to ensure that the change management of PTEs in the group was suitably monitored.

³ Test of English for International Communication

⁴ Teachers of English to Speakers of Other Languages Aotearoa New Zealand

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](http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction) 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.

A pre-scoping meeting was conducted at Foundation English before the on-site visit. Two evaluators conducted the on-site enquiry over two days. Documentation reviewed as part of the evaluation included: a self-assessment summary and data on student achievement; planning documents; student surveys; meeting minutes; curriculum; website and other written guidance material. The evaluators either met with or interviewed by phone members of governance and management, teachers and students as well as student services, marketing and support staff. This included some Christchurch staff. A selection of student records was also checked.

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 fraud⁵*
- *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.*

⁵ NZQA and the 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.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance and **Confident** in the capability in self-assessment of **Foundation English Limited** for the following reasons.

Students from a wide range of countries are retained in study, enjoy their time at Foundation English, and make excellent progress in their English language. Self-assessment processes around student engagement, student progress and overall satisfaction are sound, and show students' needs are being met.

Information is shared effectively within the PTE, and the use of quantitative data is generally strong. This includes assessment data which shows that most learners make measurable progress in their English language during their study. There is further opportunity to use self-assessment in ways that clearly show evidence of any improvements or innovation in course design and delivery across all sites.

Governance and management of the PTE provides effective oversight, strategy and resources to further the purpose of the organisation. The PTE engages constructively with NZQA, the TEC and other regulators to understand and meet their requirements. Compliance management has improved.

Teachers are suitably qualified and have relevant experience to deliver effective language teaching. Processes for teacher appraisal and development are strong. Documentation of these processes is thorough.

There are useful systems to gather and collate feedback from learners. The quality and validity of the information collected is sound and is used to gauge student satisfaction and monitor the performance of teachers. Based on self-assessment records and on-site interviews, it is less clear how well integrated the shared services system and classroom pastoral care processes are. Areas being strengthened or that need to be further strengthened include: follow-up of new students; ensuring all staff responsible for aspects of the Education (Pastoral Care of International Students) Code of Practice are fully involved with reviews; with an increased focus on outcomes.

Foundation English records numerous actions and their intended results. However, this could be improved by including more detail on timelines, accountability and how intended improvements will be measured or otherwise identified across more areas of self-assessment.

All of the factors noted above are important within the current context of significant structural and staffing change, the entry of new students on a weekly basis, and the three teaching sites now in operation.

Findings⁶

1.1 How well do students achieve?

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

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

Foundation English uses Cambridge English testing for placement of students and allows for class change after student/teacher consultation. Teachers use moderated achievement tests for measuring language gains and allowing progression to more challenging classes. Communication and guidance to students on these processes is clear and specific. The head of faculty regularly collates, analyses and reports data from student achievement in assessments.

Data summarised from eight-week delivery cycles in 2017 and 2018 shows strong achievement (Table 1).

Table 1. English language achievement 2017-2018

Cycle	Overall success across tests in four skills ⁷	Candidates
(2017) 1.1	86%	814
1.2	94%	980
2.1	88%	996
2.2	94%	1167
3.1	90%	1119
3.2	92%	881
(2018) 1.1	92%	965

Student completion of their intended duration of study is also seen as a key indicator of learning needs being met. Completion rates are consistently high: 2014, 97 per cent; 2015, 96 per cent; 2016, 96 per cent; and 2017, 95 per cent. There is good understanding of student withdrawals.

When all aspects of students' learning and experience are taken into account, educational performance in Auckland is somewhat better than Christchurch. Foundation English explains this by pointing to the difference in the scheduled teaching hours at the two sites, and a difference in the student and teacher profile. Self-assessment illustrates this variance, which also includes some variability in student ratings on teaching, and also expected completion rates. The head of

⁶ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

⁷ The tests assess the four English language skills: speaking, writing, reading, and listening.

faculty has implemented and monitored various actions to improve performance, with some improvements noted. (This variance is discussed further under 1.3 below.)

Achievement data is shared effectively among staff and shows that most learners make excellent progress in their English language as a result of their study. Use of quantitative data is generally strong, and the head of faculty has deepened the level of analysis and quality of reporting, including detail on students not achieving as anticipated, and identifying the reasons why. Faculty assessment reports, monthly and annual programme reports are particularly robust, and their action plans clearly specify accountabilities and completion timeframes.

Foundation English has been successful in diversifying the student population across several markets. Self-assessment should extend to analysis of achievement among the larger of these groups. It should also compare and report students' progress within the different electives⁸ and across sites to make fuller use of the available data. This would also better inform self-assessment against key evaluation question 3.

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

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

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

Students gain value from their time studying at Foundation English, with reliable evidence being gathered through systematic testing to show that most complete their intended course and improve their language competence and confidence to use English, as is their primary goal.

Since 2014 Foundation English has analysed and reported student progression from one level of study to another as a key indicator of both achievement and value of study. This is benchmarked against other English language schools⁹ to give a picture of comparable performance. From this data it is evident that the PTE's students progress well. Overall, since 2014 students have studied at the PTE for around 10 weeks on average when they move up one level of study.

⁸ Electives are level-specific and chosen by students and based on their opinion of their need, often with the advice of teachers. The electives are intended to supplement the student English language learning and are measured within the summative assessment for their level. The PTE is gathering student performance data from both Auckland and Christchurch campuses (and subsequently including the newer Tauranga campus).

⁹ Five Category 1 providers

That said, data comparisons need to be treated with caution where numerous factors such as the students' first language and age; the curriculum in use; and the methods of teaching and testing which may vary markedly, even between high-performing schools. There would be more value in evaluative conversations with other providers on factors affecting student outcomes.¹⁰ Foundation English benchmarking is more convincing where it relies upon the CEFR¹¹, and more recently the Global Scale for English, as these are embedded in the curriculum.

Approximately 12 per cent of students intend to do further study after their English course. Due to their close connections with other PTEs within the Aspire2 group, Foundation English has reliable data on how many students pursue further study. Most recent data shows 82 per cent achieved their goal, met the entry requirements, and pathway to a vocational programme. Over 90 per cent of these students succeeded and graduated.¹² These are strong results for this particular group.

Outcome benefits for domestic English language students are less evident in Foundation English's self-assessment. Though the number of domestic students is smaller than international students, this area of delivery is TEC-funded, confirming its importance for domestic students and self-assessment of their valued outcomes.

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

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

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

Foundation English programmes reportedly reflect those of one of the PTEs purchased by Aspire2. Key features include formal entry testing, placement at a range of levels, formative and summative testing, and end-of-cycle teacher student interviews. Use of the CEFR has been embedded into the curriculum for some years, and management continues to encourage use of more information technology across classes and by all teachers.

Teachers are suitably qualified, well led, and student focused. They have relevant experience to deliver effective language education for various student goals, including IELTS and business English. Processes for teacher appraisal,

¹⁰ The Head of Faculty has been instrumental in the recent establishment of a sector advisory group.

¹¹ Common European Framework of Reference for Languages

¹² 2014-2017 data

development and performance management are a strength. This is well resourced and capably led by senior staff. Documentation of these processes shows effective, ongoing use to strengthen areas of weaker teaching performance, extend teachers, and foster consistency of practice.

There are useful systems to gather and collate feedback from learners. The quality and validity of the information collected is sound and is used to gauge student satisfaction and monitor the performance of teachers. It is less clear that these systems lead to improvement or innovation in course design and delivery and improvements for particular cohorts. This reflects the context of the wider organisational change and is to some extent mitigated by teachers working together collegially and the curriculum being established on an international framework. Some students interviewed were not happy with changes in class composition and teachers. Similar comments were noted in records of focus groups with students. Overall satisfaction surveys do, however, record positive student engagement and satisfaction. The new exit survey for May 2018 found that 94 per cent had a 'very good', or 'good' overall experience.¹³

Areas being strengthened include expert, external input which could provide ongoing support to and critique of the English programmes. The recent formation of an advisory group and the new external moderation partnership are positive and necessary initiatives. There are now also more points of contact for teachers, including fortnightly meetings.

The differences in how the English programme is delivered in Christchurch, and the rationale for that, deserves further review as achievement and student satisfaction are lower there according to Foundation English data and other internal reporting.

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

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

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

Students at Foundation English are supported by shared services staff with clearly designated roles, from initial enquiry to enrolment and orientation. For all nationalities, students have the opportunity to seek advice or counsel in their home language if required. Once students are allocated to a class cohort, the day-to-day monitoring of their progress and satisfaction (and attendance) is more directly carried out by teaching staff. Students described staff and teachers as approachable and caring.

¹³ 50 per cent of graduates (87/182) responded.

Students have a range of optional services including study support, job seeking assistance, homestays and social activities available to them on campus. Some of the students interviewed had used these services. Data on uptake of these services was presented in a pastoral care summary (2017-2018). Quality assurance and oversight of homestays is thorough and well documented.

Participation in workshops and staff forums relating to international students' experience and the Code of Practice is positive. Shared services staff have also contributed to professional development sessions with teachers on code responsibilities. Knowledge of the code and its intended outcomes is good across staff groups.

Areas being strengthened or that need to be further strengthened include: documented early follow-up of new students by student support services to ensure that each student settles well and has understood key induction messages; ensuring all staff with important responsibilities for aspects of the code are fully involved with the review processes; and that a focus on outcomes is increasingly embedded. The reintroduction of an exit survey in 2018 is a notable improvement.

The 'shared services' model has involved the integration of staff from various of the original PTEs purchased by Aspire 2. Additional staff were being added to better support students and ensure that workloads are sustainable among front-line staff. As this is an area of considerable change, and the manager responsible is new to tertiary education, self-assessment should be more in-depth and outcomes-oriented than it is currently to show evidence of the claimed effectiveness of this model.

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

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

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

Governance and management provide effective oversight, strategy and resources to further the purpose of the PTE. There is comprehensive documentation relating to strategy, goal-setting and monitoring, and in relation to the wider goal for Aspire 2 International to create three PTEs from the seven original ones (over and above Foundation English). Current investments towards improving or upgrading information technologies include a new intranet, learning management system and client relationship management system. These significant capital projects are at various stages of completion.

PTE staff are capable and focused on quality delivery, with suitable experience to deliver effective English language education. The day-to-day operation of the language school is aligned to the direction of the Aspire2 Group. Aspire2 has a

goal of improving staff remuneration. Staff are now supported with paid teacher-only days and additional professional development funding.

The most recent staff engagement survey was in 2016. The rationale for suspending the survey in 2017 amidst wide-ranging change is reasonable.¹⁴ Reinstating some form of review would add to the comprehensiveness of self-assessment under this evaluation question and the associated tertiary education indicators.

Records of actions arising from various self-assessment processes and activities are maintained, and reflect many of the changes occurring across the PTE since 2017. These records would be more useful if the rationale for change was briefly noted and a timeframe was maintained showing staff responsibility for review of changes to determine clearly whether intended benefits are actually achieved.

The evaluators noted some pressure on facilities at the site where Foundation English is now operating. Students had raised some concerns at consultation meetings with Foundation English management and staff. These issues and concerns were being managed. For example, lifts were under repair during the on-site visit, and additional floor space was being procured nearby to provide more teaching space. The building code has been checked to ensure that toilet facilities are adequate for the number of students on the Aspire2 campuses.

There are two recommendations for the Aspire2 group to consider arising from this evaluation. They relate to governance expertise and the scale of the director of studies role (see Recommendations). Both are relevant to the ongoing effectiveness of this PTE and so warrant mention. They are not considered 'gaps' in the context of this EER.

1.6 How effectively are important compliance accountabilities managed?

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

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

Foundation English has been one part of a complex set of changes resulting from the formation of the Aspire2 International group of PTEs. Governance and management have been proactive and very clear in communicating their intentions with NZQA and the TEC to effectively manage compliance accountabilities throughout. Records of meetings and communications with the agencies show a clear awareness of maintaining compliance.

¹⁴ Other mechanisms were introduced such as staff focus groups. The PTE also stated that they planned to administer a staff survey within the next 12 months.

The Aspire2 shared services model includes financial, legal and quality assurance resources. This is beneficial in relation to the modest (but growing) scale of Foundation English as the director of studies and head of faculty can focus more attention on staffing, programmes and academic quality while being supported by specialist staff with management of compliance across all PTEs. Aspire2 has assigned a person to oversee compliance with the Education Act, and the rules and regulations created under that Act. The associated lines of monitoring and reporting are also clearly documented and are being used.

A TEC audit in 2017 found that some areas of the PTE's management of the Intensive Literacy and Numeracy and ESOL¹⁵ programme did not meet expectations. The report stated that the systems now in place to record contact hours have addressed most compliance issues. Foundation English has worked to address historical gaps in its systems and processes identified by the TEC audit. That said, self-assessment of this component of delivery is more focused on funding than reviewing educational performance.¹⁶ Self-assessment (including compliance aspects) of government-funded provision can be further improved, as can review of the Code of Practice as noted earlier.¹⁷

Registration rules require all tertiary education organisations to 'ensure the public information it provides is accurate, clear and not misleading'. Some aspects of the external branding and marketing of the PTE were found to be potentially confusing to students and external stakeholders. This was discussed with management, and NZQA accepts that the EER occurred in the midst of a staged process of publicly re-branding Foundation English under the Aspire2 English and Aspire 2 International brand names.

¹⁵ English for Speakers of Other Languages

¹⁶ NZQA accepts that 'students are integrated into general English classes...there is no separate programme for TEC funded students'. But they are a distinct group with potentially different pastoral support needs than their peers, and specific funder expectations warrants distinct monitoring and review as a cohort even if enrolments are relatively few.

¹⁷ Agent management and monitoring practices are notably very rigorous.

Focus Areas

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

2.1 Focus area: General English

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

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

2.2 Focus area: International student support and wellbeing

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

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

2.3 Focus area: Transformational change management/legacy issues managed

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

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

Recommendations

NZQA recommends that Foundation English:

1. Review the basis for the differences in how the English programme is delivered in Christchurch to clearly establish any educational need for variations between the three sites.
2. Initiate more comprehensive review around the quality, value and compliance of TEC-funded delivery.
3. Develop a more comprehensive self-assessment approach to gather evidence that, for example, the shared services systems and classroom pastoral care processes are integrated and effective.
4. In relation to (3), strengthen review of the Education (Pastoral Care of International Students) Code of Practice by involving all front-line staff and ensuring a focus on outcomes and use of data to support the quality of that process.
5. Improve self-assessment PTE-wide by including more detail on timelines for key improvement initiatives, specifying role-holder accountability and specifying how intended improvements will be measured or otherwise identified where this does not already occur.

In relation to Aspire2 more broadly:

- Consider adding additional expertise to the board in relation to international students, vocational education and training, and/or English language education.
- Consider a job sizing assessment of the director of studies role, in relation to the number of direct reports and the number of faculties reporting to the role.

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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