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# Report of External Evaluation and Review

Premier Hairdressing College Limited  
trading as Premier Institute of  
Education

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 31 May 2018

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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:	Premier Hairdressing College Limited trading as Premier Institute of Education (Premier)
Type:	Private training establishment (PTE)
First registered:	1 August 1993
Location:	529 Lake Road, Takapuna, Auckland
Delivery sites:	115 Queen Street, Auckland 393 Khyber Pass Road, Newmarket, Auckland 143 Durham Street, Tauranga 110 Dickens Street, Napier 224-226 High Street, Lower Hutt
Courses currently delivered:	<ul style="list-style-type: none"><li>• Certificate in Beauty Speciality (Level 3)</li><li>• Diploma in Beauty Therapy (Level 5)</li><li>• New Zealand Certificate in Hairdressing: Salon Support (Level 3)</li><li>• New Zealand Certificate in Hairdressing: Emerging Stylist (Level 4)</li><li>• New Zealand Certificate in Barber Skills (Level 3)</li><li>• New Zealand Diploma in Business (Leadership and Management) (Level 5)</li><li>• New Zealand Diploma in Business (Leadership</li></ul>

and Management) (Level 6)

- New Zealand Certificate in English Language (Levels 1-3)
- New Zealand Certificate in English Language (Academic) (Level 4)
- New Zealand Certificate in English Language (Academic) (Level 5)

Code of Practice signatory: Yes

Number of students: Domestic: 314 (221 equivalent full-time students in 2016); Māori 32 per cent, Pasifika 7 per cent, under 25 years 57 per cent, female 94 per cent

International: 51 (57 equivalent full-time students in 2016); Asian 100 per cent, male 70 per cent

Number of staff: 40 full-time equivalent staff

Scope of active accreditation: Beauty Services (to level 5)

All the currently delivered courses are NZQA-approved programmes. The other approved programmes are:

- New Zealand Certificate in Salon Skills (Introductory) (Level 2)
- Premier Certificate in Beauty Therapy (Level 4)
- Premier Certificate in Nail Technology (Level 4)
- Vocational Pathway (NCEA Level 2) Service Sector

For further details go to:

<http://www.nzqa.govt.nz/providers/nqf-accreditations.do?providerId=847351001>

Distinctive characteristics: Premier offers hairdressing training where students holistically learn theory and practice on the salon floor with real hairdressing clients purchasing their services. There is a strong focus on producing industry-ready hairdressers and equipping the students with foundation life skills.

Recent significant changes: Premier has a long-term strategic plan in place to diversify their educational activities and student enrolments. Over the past two years, Premier has gained approval to deliver hairdressing, beauty

services, business and English language programmes. Since the last external evaluation and review (EER), international students have enrolled in the hairdressing programmes alongside domestic students. Increasing numbers of international students began enrolling from mid-2016, mostly in the new business programmes. Most of these students have been previously enrolled with other New Zealand training organisations, some of which have been de-registered. There were 188 international business students enrolled on day one of the EER site visit.

Premier has relocated to new and upgraded campuses in Napier (2014) and Takapuna (2016). It opened a Queen Street (2016) campus and moved to a larger Tauranga campus in March 2017 to accommodate the growing numbers of business students.

The Tertiary Education Commission funds Premier's domestic students mostly through Student Achievement Component funding. There is also a small number of Youth Guarantee students, who learn alongside the adults.

Previous quality assurance history:

The most recent EER of Premier Hairdressing College Limited took place in April 2014. NZQA was Highly Confident in both the educational performance and capability in self-assessment of the PTE.

An Immigration New Zealand spot-check undertaken in August 2017 found only minor gaps in the records sighted. For 1 January-30 September 2017, Immigration New Zealand figures show that 227 Premier students applied for visas (220 applying from onshore); 221 were granted a visa (97 per cent).

Premier participated in the Consistency Review of the New Zealand Certificate in Hairdressing (Salon Support) (Level 3) and the New Zealand Certificate in Barber Skills (Level 3) in September 2017. Both programmes were rated as sufficient: that is, the evidence Premier provided effectively

demonstrated that its graduates matched the important graduate profile outcomes.

An NZQA monitoring site visit (25 August 2017) assessed the design and marking of the internal English proficiency test. It found that the four key criteria were not met and it is likely that students who have been enrolled on the basis of the internal test did not have the necessary English language proficiency for their selected programme. Therefore, NZQA does not have confidence in the internal test and Premier has failed to comply with Rule 18 of the NZQF Programme Approval and Accreditation Rules 2013, as the international students who enrolled in its programmes would not meet the appropriate English language proficiency for those programmes.

While on site, the EER team collected 42 assessment samples of the New Zealand Diploma in Business (Leadership and Management) (Level 6). External moderators agreed with the assessor judgment that three samples should have been marked 'Not Competent'. The moderators consider the remaining 39 samples that were awarded a pass should have all received a fail grade. The moderators also identified potential authenticity issues with 28 out of the 42 samples (67 per cent).

The above findings resulted in NZQA issuing Premier with a Compliance Notice (23 November 2017). This required Premier to cease enrolling new students into the New Zealand Diploma in Business (Leadership and Management) (Level 5 and Level 6) and cease releasing assessment results or awarding qualifications for these two programmes.

Following receipt of the above moderation findings and compliance notice, Premier acknowledged responsibility for the quality concerns identified and agreed that the assessment practice in the New Zealand Diploma in Business (Leadership and Management) (Level 5) was also unsatisfactory, rather than requiring further

external moderation to be carried out.

Due to the seriousness of the concerns about Premier's internal English proficiency testing and assessment practices, NZQA put in place a formal Conditions Notice (8 December 2017)<sup>1</sup> on Premier's accreditation to provide the level 5 and 6 business diplomas with Premier's agreement. Premier must:

- 'not enrol new students into the New Zealand Diploma in Business (Leadership and Management) (Level 5 and Level 6)
- provide evidence of the English language proficiency of all current students
- review all assessment material and appoint a moderation partner to moderate the reviewed assessment tasks and marked student work.'

Premier has developed an action plan to ensure compliance with these conditions.

A monitoring visit to the Queen Street campus (14 November 2017) found:

- 'Premier had drawn down some fees from the Public Trust before some students had a visa to start.
- A significant number of the sampled student files showed students did not have a current insurance policy when they started or there were gaps between one policy ending and the next policy starting.
- No receipts were retained on file as the PTE Enrolment and Academic Records Rules 2012 require.<sup>2</sup>
- Correspondence, including offers of place,

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<sup>1</sup> The Conditions Notice superseded the Compliance Notice issued on 23 November 2017.

<sup>2</sup> The independent EER reconsideration reviewer later confirmed that there is no such requirement provided they can be easily recovered and confirmed that receipts were provided as requested to NZQA during the visit.

receipts and Public Trust did not state the first day and last day the student is required to attend class.

- The letter of offer had an inordinate number of holidays.<sup>3</sup>

Premier has taken appropriate actions to remedy the issues.

Other:

Premier purchased The International College of Camille Limited in June 2016. The most recent EER of Camille took place in October 2015. NZQA was Confident in both the educational performance and capability in self-assessment of that PTE. Premier Education absorbed this organisation after the EER site visit in October 2017.

## 2. Scope of external evaluation and review

Three focus areas were selected for this EER. The rationale is explained below.

### 1. International Students: Support and Wellbeing

This is a mandatory focus area for a tertiary education organisation enrolling international students.

### 2. New Zealand Certificate in Hairdressing: Emerging Stylist (Level 4)

Hairdressing is an established educational focus for Premier. This newly approved programme is the highest-level hairdressing qualification listed on the New Zealand Qualifications Framework. The Hutt City campus was selected as it has a high proportion of Māori students and some enrolled international students.

### 3. New Zealand Diploma in Business (Leadership and Management) (Level 6)

This is a new programme and a new educational domain for Premier. It enrolls only international students and there has been significant growth in enrolments. NZQA has identified business programmes that only deliver to international students are a potential risk. The Tauranga campus was selected as it only enrolls business students.

The English language programmes were not selected as they had few enrolled students. The International College of Camille Limited beauty services programmes were not selected as this PTE was then separately registered and had

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<sup>3</sup> The independent EER reconsideration reviewer has confirmed that the issue of holidays and the letter of offer was referred to Immigration New Zealand.



been evaluated in October 2015, when NZQA expressed confidence in the organisation.

### 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 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.*

The lead evaluator met with the Premier leadership team prior to the on-site visit to agree on the scope and process for the EER. The evaluation team of two evaluators spent one and half days at the Tauranga and one day at the Lower Hutt campus. The team met in Tauranga with: the managing director, the board chair, the general manager, an advisory board member, the regional manager, the business support manager, the international education manager, the Tauranga business support manager, two New Zealand Diploma in Business Tauranga tutors and two Auckland tutors via phone, and eight randomly selected level 6 students. The team met in Lower Hutt with the quality control manager and the floor manager, three tutors and all 11 Emerging Stylist students. Phone interviews were undertaken with a Tauranga employer, another advisory board member and a hairdressing industry assessor.

Before and during the site visit, Premier provided the evaluation team with an extensive range of documentation including: a self-assessment summary, mapping of tertiary evaluation indicators, strategic plans, programme reviews, benchmarking analysis, Code of Practice reviews, board of directors and advisory board minutes, consistency review submissions, surveys of students and agents, and an international student handbook. The team also viewed information held by NZQA, the Tertiary Education Commission and Immigration New Zealand.

On site, the evaluators viewed a random selection of six student files. The evaluators collected assessment samples from the New Zealand Diploma in Business (Leadership and Management) while on site, and NZQA commissioned external moderation of the samples. The evaluators considered these findings, along with other NZQA reports including an assessment of Premier's internal English proficiency test and a monitoring visit to the Auckland campus (see Previous Quality Assurance History for details). The interviews and documentation, along with the post-site findings, provided a sufficient range of evidence for the evaluators to reach sound evaluative judgements about the organisation.

## *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<sup>4</sup>*
- *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.*

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<sup>4</sup> NZQA and the Tertiary Education Commission 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

## Statements of confidence on educational performance and capability in self-assessment

NZQA is **Not Yet Confident** in the educational performance and **Not Yet Confident** in the capability in self-assessment of **Premier Institute of Education**.

Premier has contrasting levels of educational performance in its two distinct programme areas. The established vocational hairdressing programmes have continued to meet the important needs of the students and stakeholders. The self-assessment has effectively supported this ongoing high performance. However, the new business programmes have not met many important needs of the students and stakeholders and there have been some serious weaknesses in key processes. The PTE's self-assessment was generally ineffective in identifying and addressing these performance gaps.

- The established hairdressing programmes have generally very strong results. Premier produced detailed and convincing evidence that the hairdressing programmes match well the needs of the students and industry, providing significant outcomes for both. It has developed and now delivers four hairdressing programmes leading to the newly listed NZQA qualifications. The rolling three-year (2014-2016) course and qualification completion averages were over 80 per cent. These rates generally matched, and sometimes exceeded, other high-performing providers offering similar programmes. Most hairdressing students develop the required knowledge and skills to successfully progress to further training or related employment. Students learn by doing 'on the floor' in a hairdressing academy supported by experienced and trained tutors. Sound assessment and moderation, up-to-date equipment, new facilities, strong industry linkages and ongoing reviews support this high level of educational performance.
- The paper completion rates of the new level 5 and 6 business programmes appeared to be high. However, these results were not reliable – an NZQA commissioned external moderation of a random sample of level 6 assessments found none had met the required academic standard.<sup>5</sup> An external review also found the English proficiency testing of enrolling students was flawed. Just four students have graduated and so the evidence of outcomes was naturally limited. Nevertheless, most were working at the same organisation as when they were studying, and the evidence was not convincing they had progressed into roles consistent with the stated qualification employment pathways. Premier sought

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<sup>5</sup> For details see Previous Quality Assurance History in the Introduction.

external expertise to design the business programmes and engaged tutors with relevant business qualifications and experience; the majority had tertiary teaching experience and a few had teaching qualifications. While an internal review identified some performance gaps, it was NZQA that identified the serious gaps.

- Premier has been generally effective in enabling most students to stay engaged and involved in their learning. This was evidenced by usually good retention rates and positive student feedback about the support they received from staff.
- Premier has not effectively managed its compliance requirements, mostly in its provision to international business students. Unreliable English language proficiency testing and unsound assessment and moderation practices led to NZQA imposing a statutory Condition Notice<sup>6</sup> on its accreditation. A review of student records showed the organisation had drawn down students' fees from the Public Trust before it was entitled to do so, and some students did not have full insurance coverage. The recent annual Code of Practice reviews were rudimentary and not well integrated into the self-assessment of student welfare.
- Leadership and self-assessment processes have continued to be highly effective in supporting educational performance in the vocational programmes. The leadership has been enhanced by the strengthened and active advisory board. The strategic decision to diversify has produced benefits in some areas but clearly not in the implementation of the business programmes. Governance and management has not effectively supported educational performance in the business programmes and has allowed rapid enrolment growth that contributed to diminished quality. Self-assessment processes were not adequate to identify the key gaps, their significance or enable the organisation to effectively address them.

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<sup>6</sup> For details see Previous Quality Assurance History.

# Findings<sup>7</sup>

## 1.1 How well do students achieve?

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

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

Premier has two distinct programme areas: the established hairdressing programmes, which have outstanding results; and the new business programmes, which are rated as poor because the achievement results are unreliable due to critical weaknesses in the assessment practices. Overall, educational achievement is inconsistent.

The hairdressing students are mostly domestic, predominately female students, under 25 years of age. Over 30 per cent of them are Māori and over 5 per cent Pasifika. Premier has a detailed understanding of student achievement based on robust analysis of key trends. Variations are investigated and used to guide clear actions; assessing the impact of these actions would add more depth to these reviews. Achievement is clearly benchmarked against sector and sub-group medians and, most significantly, education providers offering similar hairdressing programmes. The rolling three-year (2014-2016) course completions average was 83 per cent and 81 per cent for qualification completions. Over this period these course and qualification completion rates mostly matched, sometimes exceeded, or were comparable to the higher-performing providers offering similar programmes. This is excellent educational performance.

The achievement of Māori students was generally slightly lower than the rates for all students; a pattern of achievement for the Pasifika students could not be identified due to the very small numbers. International students consistently achieved higher than the overall completion rates. The Youth Guarantee student rates were exceptional, exceeding the rate for all students from 2014-2015. Premier does not analyse the prior academic history or other key factors that impact on the learning of the students; this would offer further insight into the educational results being achieved.

The New Zealand Diploma in Business students are all international students, predominately enrolling from other New Zealand educational organisations. At the time of the site visit only four students had had time to graduate and all had done so. Premier provided detailed information about the paper pass rates; the interim

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<sup>7</sup> The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

average pass rate<sup>8</sup> for the level 5 papers was 80 per cent, and 86 per cent for the level 6 papers. Internal review processes had identified some concerns, but nothing significant. However, NZQA-commissioned independent external moderators determined that all the samples for which Premier had awarded a pass did not meet the required academic standard.<sup>9</sup> The evaluators therefore have little confidence in the reliability of these results and have rated the educational achievement of these programmes as weak.

## 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 **Adequate**.

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

The value of the outcomes for students and key stakeholders is variable. The hairdressing programmes produce clear and significant outcomes for the students and industry stakeholders. However, there was limited and unconvincing evidence of the new business programmes producing outcomes for its few graduates, current students and local employers.

Most domestic and international hairdressing students develop the required foundational knowledge and technical skills to progress to further training or related employment. Eighty-five per cent of the 2016 Salon Support level 3 graduates went on to enrol on the level 4 Emerging Stylist programme. After 12 months, 24 per cent of the 2016 Emerging Stylist graduates were working in a salon, 16 per cent were in related employment, and 26 per cent were in further training. These are clear and significant destinational outcomes for two-thirds of the graduates.

NZQA consistency reviews<sup>10</sup> found Premier had convincingly demonstrated that the 2016 graduates of both the level 3 Salon Support and the level 3 Barbering qualification displayed the desired graduate profile outcomes for these qualifications. The overall quality of the destinational and outcomes information was consistently high and actively used to make improvements.

In contrast, at the time of the EER visit just four students had graduated from the new business programmes and naturally the evidence of outcomes was limited. Nevertheless, most of these graduates were working at the same organisation as when they were studying. There was no convincing evidence that they had gained

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<sup>8</sup> Paper pass rates are finalised when the programme is completed.

<sup>9</sup> See Previous Quality Assurance History in the Introduction.

<sup>10</sup> <http://www.nzqa.govt.nz/providers-partners/consistency-grad-outcomes/>

or progressed into work roles consistent with the stated qualification employment pathways.<sup>11</sup> Due to the unreliability of the assessment results (See Findings 1.1) it was not clear how much the business capability of these graduates had been improved. The absence of formal employer feedback (and the belatedly development of linkages with the local industry) have not clarified this issue.

### 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 **Poor**.

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

Premier has developed and delivers vocational hairdressing programmes and activities that match well the needs of the students and industry. There is a clear understanding of the industry and the students who seek to enter the industry. Premier was a PTE representative on the steering group developing the new qualifications, and the organisation now offers a suite of four newly approved programmes, including a new pathway to a barbering qualification, which some students have taken up.

The PTE has adopted a hands-on 'holistic' learning approach well suited to students who often have limited academic achievement at school. The students learn by observing and doing 'on the floor' in a hairdressing academy environment where hairdressing services are delivered to paying clients. Over 90 per cent of the 2016 students surveyed agreed the programmes helped them to be work-ready.<sup>12</sup> Premier has invested in up-to-date, industry-level facilities and equipment, opening three new academy campuses since its last EER. Each week, students have one-to-one sessions with their tutor to review their progress and develop their weekly personal learning goals, including preparing for upcoming assessments. Most students found these sessions supported their learning. Experienced hairdressers with a passion for training effectively facilitate the students' learning. The tutors either have an adult education and a literacy and numeracy education qualification or are being supported to gain these two qualifications.

Robust systems and student resources support consistent and typically high-quality delivery across the three academies. The internal programme reviews are detailed – including student and stakeholder feedback – and lead to ongoing changes such as offering more creative colour and more advanced cutting techniques in the level

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<sup>11</sup> <http://www.nzqa.govt.nz/nzqf/search/viewQualification.do?qual=2460>

<sup>12</sup> As noted in Findings 2.1, graduates from two of the four offered programmes demonstrated the desired graduate profile outcomes.

4 programme. Premier will trial new online learning resources to support the current delivery approach, including students being able to upload completed assessment tasks. Internal moderation practices, confirmed by external moderation reports (including site visits), give confidence that assessment practices are sound and appropriate.

Premier has, over the past 18 months, begun delivery of business programmes to international students, offering a higher level of education (level 5 and 6) in a new discipline area to a different student cohort. Enrolments have grown rapidly. The PTE sought external expertise to design the programmes. Premier engaged tutors with suitable business qualifications and experience, the majority with tertiary teaching experience and a few with teaching qualifications. Premier's internal reviews identified some performance gaps and actions to address them. For example, assignment resubmission rates were tracked and analysed and actions formulated to address gaps. The PTE concluded that the semester duration was too short and was considering doubling the semester to a 12 or even 18-week cycle. The review found that some students had poor academic skills, and provided some additional tutorial support. Internal moderation identified assessment gaps, some significant for some of the papers delivered.

However, following the EER site visit NZQA identified serious weaknesses in these programmes. An NZQA review of the English proficiency test found the language capability of the applicants had not been robustly assessed on entry. NZQA commissioned independent moderation of level 6 assessment samples collected on site. All 42 assessment samples were found not competent, whereas Premier moderators judged only three of these samples as not competent. It is concerning that the internal moderation processes and review did not identify the prevalence and seriousness of the English language limitation of the students and assessment practices. The PTE's self-assessment processes have clearly been ineffective in addressing these performance gaps.



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

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**.

Premier is generally effective in supporting its students to stay involved and complete their studies.

The hairdressing students, be they domestic or international, receive targeted individualised support each week from their tutors. Weekly meetings are used to track and record progress being made on completing assessments, to develop a weekly plan preparing them for upcoming assessments and to address any other issues affecting the students' learning. Students' survey feedback rates these weekly meetings as being effective.

Head office monitors assessment trends, following up with site management when assessment is not following typical trends, and at times provides additional support or resourcing. For example, a fall in the achievement of Māori students led to Premier engaging an outside consultant with relevant expertise, who visited each campus helping to identify key barriers and develop strategies to overcome these barriers. In another example, the hairdressing campus management structure has been changed to have floor managers who focus on educational issues and quality control managers who focus on student support and campus logistics. The impact of these key initiatives is sometimes not clearly and systematically evaluated. The welfare of the international students on these programmes could be more clearly monitored and reported.

The international business programme students are mostly well supported to stay involved and complete their studies. The retention of students is high, with only four out of well over 150 students withdrawing over the past year. The student support survey reported 'very good results', but the response rate was unclear and there was limited reporting of the results. There was mostly favourable feedback on the teachers and the programmes, particularly in Tauranga. The student representative system appears provided feedback in some classes that led to actions for improvement. There are some sound pastoral care processes in place to support these students. For example, the student feedback on the orientation process was very positive. The review of the business programme demonstrated that some pastoral care processes were effective. However, the 2016 and 2017 reviews of the Code of Practice were rudimentary and mostly descriptive (see Findings 1.6) and did not provide sound evidence that the ten pastoral outcomes were being well met.

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

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

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

Premier is an established PTE where the leadership has effectively supported a high level of achievement in vocational education over time. The organisation has continued to invest in people, systems, fit-for-purpose facilities and appropriate resources to support learning. Detailed knowledge of the industry and its organisational culture has enabled the PTE to robustly identify needs, collect and analyse rich performance data, and develop coherent responses and processes, which are periodically and formally reviewed. There have been ongoing quality improvements in response to a changing operating environment, including opening three up-to-date hairdressing academy campuses, restructuring the campus management structure, developing a Māori and Pasifika strategy, and piloting e-learning.

Premier made a strategic decision in 2014 to diversify and move away from solely offering hairdressing programmes. This led to Premier changing its trading name to Premier Institute of Education, purchasing a beauty services education provider, enrolling more international students on its hairdressing and beauty services programmes, and moving into a new field of education – gaining approval to deliver business and English language programmes to international students.

Premier engaged outside expertise and significantly strengthened its advisory board, with some members visiting campuses to review performance and develop staff capability. An international manager position was recently established to respond to increasing enrolments. However, the rapid growth in new programme, aggravated the performance gaps noted in this report.<sup>13</sup> The processes the leadership put in place were not effective in maintaining a high-quality level of education in this delivery area. The self-assessment processes did not identify the emerging performance gaps.<sup>14</sup> In summary, governance and management has been inconsistent in supporting educational performance across the organisation.

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<sup>13</sup> For example, Premier set a maximum business class size of 20 students as an indicator of quality education. The rolls of three classes were well above this mark on 10 October 2017.

<sup>14</sup> See also Findings 1.6.

## 1.6 How effectively are important compliance accountabilities managed?

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

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

Premier has not effectively managed some of its important compliance accountabilities. Self-assessment processes have not identified and addressed some serious compliance gaps. Premier has managed the established hairdressing programme requirements well. However important requirements have not been met, predominately for the new business programmes offered to international students. These are:

- An NZQA review did not have confidence in the internal English language test. Premier was not compliant with Rule 18 of the NZQF Programme Approval and Accreditation Rules 2013.
- Serious weaknesses have been identified in the assessment and moderation practices of the level 5 and 6 business programmes. Therefore, Premier was not compliant with Criterion 1 of Rule 6.1 of the NZQF Programme Approval and Accreditation Rules 2013. This rule requires Premier to ensure that assessment materials and decisions are fair, valid, consistent and appropriate for the level, given the stated learning outcomes.

A monitoring visit (14 November 2017) also found:

- Premier had drawn down some student fees from the Public Trust before they were entitled to do so.
- A significant number of the sampled student files showed students did not have a current insurance policy when they started, or there were gaps between one policy ending and the next policy starting.
- No receipts were retained on sighted business programme student files as required by the PTE Enrolment and Academic Records Rules 2012.

Premier has now remedied these identified issues.

The two most recent annual Code of Practice reviews have been rudimentary. The reviews mostly describe the processes undertaken rather than evaluating how effectively these processes have supported student welfare. Also, the Code review processes is not well integrated with other self-assessment processes. For example, while student feedback is collected, it has not generally focused on how well the pastoral care outcomes have been met. The EER process did not, however, identify any significant concerns about student wellbeing.

## Focus Areas

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

### 2.1 Focus area: International Students: 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**.

### 2.2 Focus area: New Zealand Diploma in Business (Leadership and Management) (Level 6)

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

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

### 2.3 Focus area: New Zealand Certificate in Hairdressing: Emerging Stylist (Level 4)

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

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

# Recommendations

In addition to the various actions plans Premier Institute of Education has developed to ensure compliance with its statutory conditions and other quality assurance reports<sup>15</sup>, this report recommends that Premier:

- Closely monitor and evaluate the ongoing performance of the level 5 and 6 New Zealand Diploma in Business programmes. Key areas would include academic achievement, the important outcomes for graduates and employers, and key contributing processes.
- Analyse the prior academic achievement of the students enrolled on the vocational programmes and other key factors that affect educational achievement.
- In each programme review, assess the impact of actions identified and taken in the prior review.
- Include the sample rates for any data collection, such as surveys, feedback or moderation.
- Assess the outcomes of pastoral care processes in the annual review and integrate this review with related self-assessment processes.
- Review the strategic plan in the light of recent events.

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<sup>15</sup> For details see Previous Quality Assurance History in the Introduction.

# 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](http://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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