External Evaluation and Review Report

Premier Institute of Education Limited trading as Premier Institute of Education

Date of report: 5 September 2019

About Premier Institute of Education Limited trading as Premier Institute of Education

Premier Institute of Education (Premier) is a family-owned business that offers hairdressing, barbering, nail technology and beauty therapy programmes to domestic students funded by the Tertiary Education Commission, and a very small number of international students.

Type of organisation:	Private training establishment (PTE)
Location:	529 Lake Road, Takapuna, Auckland
Code of Practice signatory:	Yes
Number of students:	Domestic: 136 students
	International: four students
Number of staff:	28 full-time and seven part-time staff
TEO profile:	See: NZQA – Premier Institute of Education Ltd
Recent significant changes:	Over the past 18 months, Premier has restructured the organisation and consolidated its programmes and delivery sites. The number of international students has declined significantly.
Previous quality assurance history:	*Business programmes*
	In December 2017, NZQA imposed conditions on Premier's accreditation of two business programmes: New Zealand Diploma in Business (Leadership and Management) (Level 5) and New Zealand Diploma in Business (Leadership and Management) (Level 6). The conditions required Premier to implement an agreed remedial plan in relation to its current students to confirm the validity of all credits awarded to students as at the date of the notice, and to conduct a review of all assessment material and appoint a moderation partner to pre-moderate reviewed assessment tasks and post-moderate marked learner work. In August 2018, NZQA undertook a visit to review the management of these remedial processes following

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the imposition of the conditions. In December 2018, NZQA revoked conditions on accreditation for both business programmes. Premier does not currently offer or deliver business programmes.

English programmes

In February 2019, Premier requested withdrawal of its accreditation for the NZCEL[1] programmes and the consents to assess connected to these programmes.

Tertiary Education Commission (TEC)

The TEC's audit report (September 2018) indicated three areas for improvement and one area of non-compliance (enrolment and eligibility).

Last EER outcome:	Not Yet Confident in educational performance
	Not Yet Confident in capability in self-assessment
	(EER conducted October 2017, report published May 2018)
Scope of evaluation:	• New Zealand Certificate in Barber Skills (Level 3)
	• New Zealand Certificate in Nail Technology (Level 4)
MoE number:	8473
NZQA reference:	C34878
Dates of EER visit:	21-23 May 2019

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[1] New Zealand Certificate in English Language

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Summary of Results

Over the past 18 months, Premier has focused its resource and activities on rectifying and improving several substantial issues, resulting in significant changes to the number and location of sites, programmes and staff. Progress is clearly evident, resulting in improved self-assessment and educational performance. The evidence supporting the effectiveness of the changes is emerging and generally positive. With time, the extent and impact of the changes will become more evident.

Confident in educational performance

Confident in capability in self-assessment

- Programme completion rates are improving. Enhanced and systematic oversight of internal moderation activities validates achievement. Analysis of data, although generally effective, could be more comprehensive to provide relevant information for review and factors for consideration.

- Graduates have increased confidence and have gained industry skills as well as other outcomes such as engagement in education and employment. All programmes lend themselves well to genuine self-employment opportunities.

- Programmes are well matched to meet learner needs and provide skills and knowledge development, to ensure learners are industry-ready. Self-assessment activities are systematically occurring and are providing some useful information. More detailed analysis and review of these processes would enhance the quality of the information gathered for review.

- Students are involved in their learning through the training record book and engagement with tutors, and they benefit from the small class sizes. Self-assessment to show that the pastoral care needs of international students are being met needs improvement.

- Premier's governance has effectively planned and managed the recent significant period of change. Governance and management have focused their activities and resources on areas important to educational performance.

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- The monitoring and management of compliance activities varies, but most compliance matters are being effectively managed.

Key evaluation question findings[2]

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Premier monitors educational performance indicators stipulated by the TEC. This shows that overall programme completions for hairdressing, barbering, nail technology and beauty therapy were 75 per cent for 2017 and 73 per cent for 2018, just below the average for all providers. Premier also monitors Māori and Pasifika achievement. Overall, the few Pasifika learners are achieving on a par with all other learners. Māori learners, who are a larger proportion of all learners, are not achieving to the same extent – programme completions were 65.5 per cent for 2017 and 66 per cent for 2018. Premier recognises that this needs to improve. The focus area achievement data indicates an overall programme completion rate of 76.7 and 78.5 per cent for 2017 and 2018 respectively. For nail technology, the rates were 54.6 and 64 per cent for 2017 and 2018 respectively. The validity of these rates of achievement is assured through the strengthened internal moderation processes which are providing better oversight of this important academic activity and beginning to monitor consistency in assessment across sites. Processes to monitor achievement are evident at governing board, management and programme levels and are generally effective. Self-assessment could be further strengthened with analysis of the data collected to inform improvements, such as comparison and analysis of the varying achievement outcomes, by programme and site, including literacy and numeracy testing.
Conclusion:	Programme completion rates are improving. Enhanced and systematic oversight of internal moderation activities validates achievement. Analysis of data, although generally effective,

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

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	could be more comprehensive to provide relevant information for review and factors for consideration.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	All programmes at Premier provide a pathway that meets the learners' goal of employment in their area of interest and creativity.
	Completing qualifications in nail technology and barber skills enables graduates to become self-employed or to work for others, which are the intended outcomes learners are hoping to gain. Premier's graduate data shows that 50 per cent and 78 per cent of nail technology graduates gained employment or went on to further study in 2017 and 2018 respectively; while the figures for barber skills graduates were 49 per cent and 81 per cent in 2017 and 2018 respectively.
	As an improvement, tutors have started systematically following up and reporting back information about graduates every three months after graduation and will do so for the next year. This consistent practice across all tutors and sites will likely provide more detailed data in addition to the outcomes information for review.
	Students also develop personal skills and attributes as they experience success in the programme and build their confidence. This is important to becoming work-ready and gaining improved life skills. Gathering evidence to better understand and demonstrate the extent to which these important outcomes have been met would be beneficial and support the existing strong anecdotal evidence.
Conclusion:	Graduates have increased confidence and industry skills as well as other outcomes such as engagement in education and employment. All programmes lend themselves well to genuine self-employment opportunities.

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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:	Premier understands industry needs through its engagement with the hairdressing sector for over 25 years. Staff are mostly from within industry and, in addition to teaching, most tutors are also currently working and understand not only industry but local needs.
	Programmes are well matched to the learning needs of the students. Theoretical knowledge is embedded through the opportunities to practise techniques and develop skills that improve confidence. Teaching is designed to be holistic and flexible, promoting reflection on learning; self-directed learning activities relate to the learning and to improving skills.
	Tutors either have or are working toward qualifications to teach and assess. The effectiveness of teaching is evidenced through learner surveys and peer observation of tutors' teaching, where benefits to the observer were highlighted by the tutors. These activities are generally effective in informing tutors about their performance – including any areas for improvement – although they could be strengthened further.
	The training environment reflects the industry in terms of layout, equipment and resources, which learners use as they develop their skills. There are sufficient equipment and opportunities for all learners to participate in practical training activities. Overall, Premier is providing an authentic learning experience which learners value.
	The improved internal moderation practice is still to be fully evident through external moderation. Moderation results vary, but overall confirm that assessment is at the national standard. Barbering skills and hairdressing clearly met the national standard, while nail technology has not yet undergone external moderation, and assessments in the beauty programme require some modification.
	Premier primarily uses surveys to gather student feedback, which indicates high levels of satisfaction. In their interviews with the evaluators the students expressed various levels of satisfaction with the programme, the teaching and resources.

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	Premier's own data, although collated, is difficult to analyse in any detail to draw further understanding for comparison. Premier could benefit from reviewing the effectiveness of this process to capitalise on indicators of both satisfaction and dissatisfaction.
Conclusion:	Programmes are well matched to meet learner needs and provide skills and knowledge development to ensure learners are industry-ready. Self-assessment activities are systematically occurring and are providing some useful information. More detailed analysis and review of these processes would enhance the quality of the information gathered for review.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	This year Premier has introduced a role at each site dedicated to student enrolment. This role focuses on provision of information and interviews prior to enrolment, assisting with funding applications, and orientating learners to the institute and programme.

Nail technology and barbering have small classes, and individual learning needs are accommodated through one-to-one time with the tutor. Goals are set weekly in the training record book to monitor how each learner is progressing and to identify areas for further development of skills and knowledge.

Attendance is monitored and, combined with surveys provides a reliable indication of how well students are engaged and supported in their learning; as previously discussed, analysis of the data could be improved. Premier currently has four international students based at two sites. There were no concerns raised during the EER regarding the pastoral care of these students. However, it is hard to determine how well Premier meets the various unique pastoral care needs of international students.

Premier has been conscious of managing the impact on the students of the many recent changes in the PTE. It is clear in the examples provided that Premier is prepared to accommodate |

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	and consider the practicalities of learner needs and mitigate any impact on learning and completion, within reason. A 'change team' initiative is being planned which recognises the different types and levels of support required for different learners, although this is not yet in place. The future intention is to better identify needs and target support for learners by upskilling staff.
Conclusion:	Students are involved in their learning through the training record book and engagement with tutors, and they benefit from small class sizes. Self-assessment to show that the pastoral care needs of international students are being met could be improved.

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

Performance:	**Good**
Self-assessment:	**Good**
Findings and supporting evidence:	Premier's governance and management have been in a process of change for the past 18 months, recognising the need to address issues of performance identified at the 2017 EER. The improvement plan and resulting activities have required investment of time and resources to implement the significant changes to programmes, delivery sites and staffing, all the while continuing programme delivery. There has been some impact on the PTE in terms of under and over-delivery of TEC-funded learners, and on learner achievement. Overall, the management of these changes and improvements has been undertaken carefully and ethically and is near completion. The organisational restructure has included clarification of management and site positions, roles and reporting, including a recent part-time appointment to mentor the executive director and guide the senior management team. The senior management team has improved organisational oversight and focused on embedding processes to support educational performance. The full extent and benefit from the changes is still to be evidenced. Importantly, tutors are noting a reduction in their responsibilities, enabling them to focus more specifically on teaching and learning. External expertise is providing guidance in relation to the enrolment and support of international students.

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	The reporting and aligning of the PTE's activities and decision-making at management level with the strategic plan, organisational goals and direction could be made clearer as the PTE moves into a phase of consolidation.
Conclusion:	Premier's governance has effectively planned and managed the recent significant period of change. Governance and management have focused their activities and resources on areas important to educational performance.

1.6 How effectively are important compliance accountabilities managed?

Performance:	**Good**
Self-assessment:	**Marginal**
Findings and supporting evidence:	Since the previous EER, Premier has responded to recommendations from NZQA and the TEC, resulting in NZQA revoking conditions on accreditation for both business programmes, while TEC audit recommendations have been addressed.
	In addition to working with NZQA and the TEC to rectify these issues, Premier has introduced a new student management system to support monitoring of priority areas. It has also introduced two positions dedicated to monitoring and ensuring consistency across sites and programmes in areas that pertain to compliance, assessment and moderation, and student enrolment and eligibility. The positions and staff are well embedded and policies guide practice, demonstrating that Premier is moving in the right direction.
	Compliance pertaining to NZQA rules is mostly managed effectively. The improvement plan submitted to NZQA following the previous EER is being implemented with actions and tasks being progressed. An internal calendar to track compliance covers key areas of compliance relevant to the PTE. Programme review ensures programmes are delivered as approved and, where necessary, appropriate changes are made to meet needs.
	Activities in relation to the Code of Practice (for the pastoral care of international students) could be improved. As discussed in 1.4, the evidence of effective pastoral care and the 2018 annual Code of Practice self-review describe processes rather

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	than evaluating how effectively the processes have supported student welfare. Training for staff who engage with international students is being planned but has not yet occurred.
Conclusion:	The monitoring and managing of compliance activities varies. Most compliance matters are being managed effectively.

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Focus Areas

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

2.1   Focus area: New Zealand Certificate in Barber Skills (Level 3)

Performance:	**Good**
Self-assessment:	**Good**

2.2   Focus area: New Zealand Certificate in Nail Technology (Level 4)

Performance:	**Good**
Self-assessment:	**Good**

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 Premier Institute of Education Limited trading as Premier Institute of Education:

- Review self-assessment processes to ensure a range of quality information is gathered.

- Undertake comprehensive analysis of data and information gathered to draw meaningful conclusions and inform decision-making.

- Arrange training for all relevant staff in the Code of Practice at all sites where international students are located.

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.

There are no requirements arising from the external evaluation and review.

Appendix

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 fraud[3]*

- *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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[3] 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.

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Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.

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 including ITOs but excluding universities, and*

- *maintaining training scheme approval for all TEOs other than universities.*

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.

In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 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, training schemes 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 2016. 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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