



NEW ZEALAND **QUALIFICATIONS** AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

QUALIFY FOR THE FUTURE WORLD
KIA NOHO TAKATŪ KI TŌ ĀMUA AO!

Report of External Evaluation and Review

ILA Education (NZ) Limited
trading as Kaplan International English

Confident in educational performance

Confident in capability in self-assessment

Date of report: 6 December 2017

Contents

Purpose of this Report.....	3
Introduction	3
1. TEO in context.....	3
2. Scope of external evaluation and review	4
3. Conduct of external evaluation and review.....	5
Summary of Results	6
Findings	10
Recommendations	21
Appendix	22

MoE Number: 8682
NZQA Reference: C24355
Date of EER visit: 4 and 5 April 2017

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:	ILA Education (NZ) Limited trading as Kaplan International English (Kaplan)
Type:	Private training establishment (PTE)
First registered:	1 July 1991
Location and delivery site:	10 Titoki Street, Parnell, Auckland
Scope of active accreditation /courses currently delivered:	<ul style="list-style-type: none">• English for Academic Purposes Training Scheme (Level 4)• Examination Courses• General English• New Zealand Certificate in English Language General (Level 4)• Study Skills
Code of Practice signatory:	Yes, since 2002
Number of students:	International: 1,381 in 2016 (annual total)
Number of staff:	Full-time: 19 permanent and seven fixed-term staff Part-time: one permanent and five casual staff
Distinctive characteristics:	English language school and member of English New Zealand Students enrol from countries all over the world. In 2016, the highest enrolments were from the following countries: Japan: 23.6 per cent, South Korea: 12.2 per cent, Thailand: 11.5 per cent; Saudi Arabia: 10. 2 per cent; Brazil: 8.3 per cent,

and Columbia: 8.2 per cent.

Kaplan is part of a global international group of 40 international schools in six countries (including one in New Zealand and seven in Australia). The principal of Kaplan (Auckland) reports to the regional director of operations, Australia and New Zealand, based in Sydney.

Kaplan is an Immigration New Zealand-approved online visa provider and a Cambridge English language assessment centre.

Recent significant changes: In 2015, Kaplan piloted and implemented the Kaplan International Tools for English (KITE) placement and level testing. KITE is structured around the Kaplan global syllabus descriptors and outcomes and linked to the Common European Framework of Reference for Languages.

Previous quality assurance history: Kaplan was audited by English New Zealand in November 2015 and February 2017 and met all English New Zealand standards. At the most recent audit, English New Zealand noted six strengths relating to: staffing, student support, a pedagogically principled curriculum linked directly to course materials and integrated with extensive online material, an impressive testing system, very good facilities and equipment, and excellent self-review systems in all sections of the school. Two suggestions were to provide overall course goals for each elective and to use the English New Zealand Standards document to do self-audits.

At the previous external evaluation and review (EER) in 2013, NZQA was Highly Confident in both Kaplan's educational performance and capability in self-assessment.

2. Scope of external evaluation and review

Intensive English (including General English) was selected as a focus area as it is the main area in which students enrol. International student support was the other focus area selected because all students are international.

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.

Two NZQA evaluators conducted the EER at Kaplan's Auckland school and sole delivery site over two days. The evaluators engaged with the following representatives: director of operations (Australia and New Zealand), operations support manager, principal, director of studies, student services manager, teaching staff, student support staff, internship manager, study centre and blended learning coordinator, activities coordinator, learning technologies manager, current students, two graduates, three homestay families, and two agents.

The evaluators spent a further half-day meeting off-site after the EER visit to complete synthesising information to answer and give interim ratings for the key evaluation questions and statements of confidence. The evaluators held a closing meeting with Kaplan's principal and operations support manager by teleconference.

The evaluators reviewed a range of documents both on and off-site including, but not limited to: Kaplan's self-assessment summary, 2015 and 2017 English New Zealand audit reports and key difference summaries between each audit, the global leaving survey and a snapshot of data benchmarked across schools, the initial and five-weekly survey template, individually completed surveys and related responses by Kaplan, examples of individual student progress monitoring, Cambridge English results, IELTS (International English Language Testing System) band results, directors of studies' meeting minutes, results from an external English Language Barometer (I-Graduate) survey undertaken by Education New Zealand in 2016, and student files.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **ILA Education (NZ) Limited trading as Kaplan International English**.

Student satisfaction and willingness to recommend Kaplan to friends are two of three indicators identified and used by the PTE as key indicators to gauge learner achievement at a global level. Student survey results in these areas are consistently positive each year. Rates of student non-completions (for reasons of unacceptable attendance or attitude) are negligible. These results are a strong indicator that students' needs are well met.

Kaplan has effective processes in place contributing to learning and the meeting of students' needs:

- Individual student progress is assessed and reviewed at each five-weekly interval of students' learning to monitor progress, identify any specific support needs, and to allow students to move levels or change courses.
- Learners receive academic counselling and one-to-one feedback, including five-weekly tutor meetings (though there is some variability in their length and whether they take place during class time or after class) and students receive individual reports on their progress, including discussions on any level or class changes. Students can access clinics run for half an hour four times each week to discuss their progress or any general issues they may be experiencing. A Pathways Clinic, Attendance Clinic, and Exams Clinic are also held each for half an hour every week.
- Student learning is supported by courses and course materials (including online material) linked to the Kaplan global curriculum which provides 'can do' statements at seven levels under spoken production, spoken interaction, writing, listening, reading, vocab, grammar, pronunciation, and study skills, and which are linked to the Common European Framework of Reference for Languages. Extensive learning resources and tools, a well-resourced study centre, conversation club, and well-planned social activities also support student learning. Students have regular opportunities to experience Auckland, learn about New Zealand, use English in social contexts, and engage with and practise their English with people of different nationalities.
- Kaplan demonstrates strong pastoral care to ensure that students' wellbeing is looked after and that students have access to relevant information and services.

The PTE's collection of evidence of learner outcomes could be improved to capture a greater level of information about student outcomes and the difference and value that studying at Kaplan makes, in order to justify a highly confident rating.

- Students are asked about their aims on their first day of study, and while progress is reviewed five-weekly, there is no end-of-study question asking whether desired aims have been met.
- Kaplan identifies that a key indicator of achievement is how students feel their English ability has improved. There is no specific student survey question tailored to this and no corresponding learner feedback collected.
- While learners' individual English language progress is assessed five-weekly, additional information to show the extent to which learners develop holistically and/or improve their wellbeing and interpersonal skills is not specifically collected.
- Kaplan appears to do an excellent job of identifying pathway and internship opportunities for a small number of students seeking such opportunities. Internships are gained for students seeking these. Kaplan surveys learners and employers about learner's internship experiences. Kaplan captures information on learners' progression to pathways, but there was no overall analysis of the success of these initiatives or areas for improvement.
- Evidence of how Kaplan meets key stakeholder needs includes Kaplan meeting English New Zealand standards in 2015 and 2017. Two agents interviewed for the EER indicated satisfaction with their relationship with Kaplan and the positive reputation of the school. Most agents have a global contract with Kaplan and formal feedback is sought from them and retained by the global head office. Any issues or feedback for individual schools are provided to the local sales team of the relevant region for follow-up, with principals involved if it is an operational matter.
- Homestay providers engaged for this EER indicated to the evaluators that they were satisfied with and received excellent information from Kaplan. They valued an end-of-year get-together, which provided an opportunity for one-to-one engagement with Kaplan about their experiences.

Statement of confidence on capability in self-assessment

NZQA is **Confident** in the capability in self-assessment of **ILA Education (NZ) Limited trading as Kaplan International English**.

Kaplan has effective self-assessment processes in place that evaluate the majority of key areas relevant to educational performance, though there are some areas where the quality of self-assessment information could be enhanced to help justify a highly confident rating.

Kaplan's collection of self-assessment information to understand learner outcomes is an area that could be developed. There is a lack of collated information to show whether students' overall aims are met, how students feel that their English has improved, and the difference that studying at Kaplan has made to them.

Student leaving survey results are analysed and benchmarked with Kaplan schools internationally. The survey focuses on student recommendations and satisfaction, but not students' reflections on their progress. The global group defines the survey content. To that extent, and in terms of the leaving survey, Kaplan Auckland's self-assessment is influenced by the survey parameters determined by the global group.

Kaplan monitors individual learner progress regularly and well through placement, five-weekly, and exit testing. Management and staff have access to good quality information about individual learner achievement. Management follows through at an individual level where learners do not appear to be progressing.

Kaplan's self-assessment does not include a formal analysis of learner progression trends overall, including for learners in longer-term study. Kaplan's philosophy is that movement up English language levels is not the only indication of a successful learning outcome and is not an inevitable result given the influence of subjective factors.¹ However, because achievement information is only at an individual learner level (other than data about student satisfaction and recommendations), and other evidence of learner outcomes is limited, it is difficult to gain a picture of the extent of learner progression and achievement overall.

Kaplan has only recently determined a formal moderation process under the KITE testing system, and therefore it is too soon to understand the effectiveness of current processes. Previously, internal moderation occurred informally on a five-weekly basis. It would be beneficial for Kaplan to maintain an ongoing record summarising moderation activity, analysis, and resulting actions.

Self-assessment of performance against the required outcomes and processes in the Code of Practice lacked evidence of analysis to identify how effectively and how well the PTE is meeting Code of Practice requirements.

Kaplan captures a large body of relevant self-assessment information that is of good quality. Several self-assessment mechanisms provide relevant up-to-date information about learners' experiences and satisfaction, including face-to-face student feedback through student clinics, monthly meetings with under 18-year-old students, written feedback provided through a survey on arrival, five-weekly surveys, and a student leaving survey (produced by the global group).

Following the previous EER in 2013, Kaplan began documenting self-assessment information in focus areas. Information confirms Kaplan's close follow-through in response to any issues identified. The evaluators considered that there was variability in the level of self-assessment information recorded in the PTE's different focus area self-assessment documents. It was not always clear whether and when desired results had been achieved through actions implemented (at times, the recorded result is presumed because of the change, rather than evidenced).

¹ Kaplan refers to there being many factors affecting an individual's success in learning a language, including students' mother tongues, length of study, learning styles, motivation and especially students' objectives and focus.

Because of the extent of information recorded over several years, it was difficult to follow the cycle of self-assessment and to coherently see trends over time. This is an important consideration for the use of information by new or different personnel over time.

It was clear that Kaplan closely investigates and is highly responsive to any neutral or negative feedback from students, and information is used immediately to respond to students' requests. Kaplan also responds immediately to student feedback and advises staff when they have been mentioned positively in student leaving surveys.

Regular meetings between the director of studies and the principal and Australasian schools and counterparts facilitate relevant and ongoing reflection and improvement opportunities.

Findings²

1.1 How well do students achieve?

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**.

Student satisfaction with their experience at Kaplan, and recommendation rates, are two of three key indicators used by Kaplan at a governance and management level to monitor learner achievement. These indicators are key measures used to benchmark performance against other Kaplan schools across the Asia-Pacific region and globally.

Student satisfaction with their experience at Kaplan³ has been consistently positive over the last three years – around 93 per cent of students each year from 2014 to 2016 have rated their satisfaction as 4 or 5 on a five-point scale where 5 equates to 'excellent'. Around 95 per cent of students each year have indicated that they would recommend Kaplan to friends. Negative responses are few. Kaplan tracks and follows up neutral or negative responses individually to identify where any improvements can be made (e.g. adding a focus at five-weekly progress reviews to ensure the continued suitability of student electives). This occurs for all surveys (first week, five-weekly, end of year), to ensure actions are taken immediately to maintain high satisfaction and recommendations.

Learner non-completion rates are negligible (students who do not meet attendance or attitude requirements).

Kaplan identifies that another key indicator of achievement is how learners feel that their English ability has improved. However, there is no specific survey question asking students about this, nor is any information captured to demonstrate how Kaplan is performing against this indicator.

All learners complete a placement test on the first day of their enrolment. At the completion of five-weekly intervals, each student undertakes a test to monitor individual progress. Results are captured and are accessible to management and teaching staff. Students also have access to the KITE website which allows them to monitor their own progress and see their test results and teacher feedback. Test results are reviewed alongside other relevant information about individual student progress and learning, including to identify whether a learner can progress to a higher level of learning or may be suited to a different course. The director of

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

³ Based on an average of 64 per cent of total annual enrolments responding to the leaving survey each year between 2014 and 2016.

studies reviews each student's results and works alongside teaching staff to review consistency in how individual students are progressing (based on their results since commencing with Kaplan), and identifies further learning opportunities to support learners in their continued progress.

Only a small number of learners enrol in exam preparation courses and sit Cambridge and IELTS exams. Nevertheless, the ability to enrol in such courses provides learners with additional avenues for learning, and supports Kaplan's status as a Cambridge Exam Centre.

Kaplan tracks IELTS results for the small number of students who have sat exams each year⁴, identifying students' actual individual achievement of band scores against expected results, and which positively show little variance between anticipated and actual scores for each learner.

Kaplan captures and compares average learner pass results year-to-year, internationally and nationally for Cambridge First Certificate English (FCE) and Certificate in Advanced English (CAE) for the small number of learners (131) who have sat these exams in the last four years. Benchmarking shows that Kaplan has usually performed above or close to New Zealand and international averages. The exception was in 2016, when Kaplan pass rates were well below the New Zealand and international average (three out of 11 learners passed the FCE). Kaplan investigated that result, identifying that the results were not a reflection on the quality of teaching (i.e. student readiness was an influencing factor).

Kaplan commented that it sees students frequently increase their confidence in the use of English language independently and hears about the difference Kaplan has made through learners' graduation speeches. However, information showing how learners develop holistically and/or improve their wellbeing and interpersonal skills and abilities, is not specifically collected. Therefore, the extent to which learners develop their attributes was not apparent from evidence collected.

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 **Adequate**.

Kaplan Auckland contributes knowledge and value to the global group through proactively offering to pilot international organisational initiatives, e.g. the KITE placement and level testing, and the sharing of unique local processes (e.g. some practices followed to meet Code of Practice requirements).

⁴ Seventy-six students over four years.

Kaplan identifies that 'student extension' is one of the best ways to measure that it is adding value to the students' experience. Data produced in response to the draft EER report shows that around 7 per cent of students each year extended their stay with Kaplan. This has been a consistent trend over time. Students' reasons for extending their study are not identified, nor are any organisational expectations or benchmarks against which to understand the strength of this result.

Kaplan closely supports a small number of learners to consider pathway opportunities and to gain internships. All 27 internship students between July 2015 and September 2016 were placed in internships specifically obtained by Kaplan to meet individual students' needs and goals. The internship manager is active in engaging with learners about the internship experience and subsequent outcomes. Students are surveyed to understand the difference that the internship has made and the value of Kaplan's support. Employers are also surveyed about the intern's progress and are asked to provide references. Post-internship outcomes information to understand the ongoing value of the internships is not recorded.

Kaplan has established pathway partners with selected New Zealand tertiary education organisations and facilitates a pathways fair each year, followed by a networking session with key partners. Approximately 25-30 students each year appear to have accessed formal pathway support. Data provided showed the stage the student was at in the process towards commencing tertiary study (including the receipt of pathway counselling) but no overall information was provided showing total numbers who wanted and then achieved a pathway, nor an overall analysis of the value of the pathway support or internship initiative.

A varied social programme provides students with regular opportunities to experience Auckland, to use English in a social context, and to engage with people from different nationalities. The five-weekly survey asks students if they are happy with social activities which means the information can be used immediately. The external English Language Barometer I-Graduate survey in 2016 identified that Kaplan's graduates' satisfaction with social activities was on par with results for other schools nationally and internationally.

Overall, the evaluators considered that evidence of the value of outcomes for learners was limited. While Kaplan asks learners about their aims upon commencing, there is no measurement of achievement of these aims once students complete. The leaving survey asks students why they chose their course – for their studies, career, or self-development – but there is no corresponding question asking students (or subsequently graduates) whether Kaplan has added value to support learners' confidence, knowledge and/or attributes relevant to these areas. Even for longer-term students, or students who have taken English for specific or academic purposes, there was no information collated about the value Kaplan has added to their goals.

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 **Excellent**.

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

Kaplan provides a wide range of English language courses to cater to diverse interests and needs, with different timetables and course combinations/loads available. Student intakes are well planned, with classes structured so that there is a mix of students from different countries to respond to a preference from students to engage and learn with students from different nationalities.

The 2017 English New Zealand audit recognises Kaplan's teaching materials as modern, engaging and informed by current teaching principles. Programmes are coherent and match the needs and expectations of learners.

Learning is supported by a diverse range of relevant materials, resources and activities (including online tools called 'K+tools'). Students receive learning materials every two weeks, which are linked and relevant to current learning. Kaplan's learning tools complement in-class learning and provide extra learning activities. These are designed to match different learning styles and cater to students wishing to expand their knowledge and learning. Use of the K+tools are not compulsory for students who take Intensive English, but students are encouraged to use this as a valuable tool to enhance their English. The extent of learner engagement in the online learning tools was not apparent from the collated self-assessment data produced.

A small number of students interviewed for the EER said they did not use the online tools as they had not appealed to them. The student leaving survey question asking about the quality of 'K+sessions simultaneously asks about the quality of K+tools and K+clubs and does not differentiate between the two. Therefore, it was not possible to fully understand overall student feedback specifically on the quality of the online learning tools.

Kaplan's learner clubs, social programme and teacher-led activities support and encourage learners' use of English outside the classroom. Comprehensive activities are carefully scheduled to ensure relevance. Contingencies are also planned to ensure activities occur. Students interviewed for this EER emphasised the importance of these activities to their learning. Some learners, while positive overall about the activities, wanted a greater rotation of activities and more New Zealand cultural activities.

In 2015, Kaplan introduced the KITE testing process, following an intensive piloting process. Kaplan's testing processes (at placement, five-weekly and exit test) ensure that learners are placed in appropriate courses, and progress is well monitored.

Kaplan identifies that KITE has enabled more robust testing results. It has also been designed to be learner-centred: testing occurs at the point that each learner completes five weeks of learning, adaptive testing is tailored to individuals' learning progression, and students receive test results immediately (which are aligned to the Common European Framework of Reference for Languages). Test results are reviewed by teaching staff and management, and individual support opportunities are identified if learners are not progressing as expected.

English New Zealand audits have found Kaplan's placement test and assessment methods to be fair, valid, and appropriate. There are two cycles of learning material for low intermediate and intermediate levels, meaning students can repeat levels without repeating material. Eventually, there will be two cycles at all levels.

There was little recorded evidence of the moderation of assessment. Prior to KITE testing, internal moderation occurred informally and was undertaken on a five-weekly cycle. With the implementation of the KITE testing, all teachers underwent writing grading training. A select number of senior teachers grade all submissions and can moderate each other, though it was not apparent that moderation occurs systematically. Indeed, at the time of the EER, Kaplan was just in the early stages of determining its moderation processes.

Kaplan contributes information to the wider Kaplan group to inform the quality of assessment as well as course development.

Management and staff review five-weekly survey results to identify whether immediate action is required where neutral or negative feedback is received. It is evident that Kaplan follows up and seeks to address every concern raised, either from learner surveys or other student feedback (e.g. corresponding actions have included increasing study centre resourcing, identifying additional ways to support students to use the study centre, management working with individual staff in response to student feedback). Five-weekly survey results are not collated overall or over time, though documentary evidence for 2017 shows that Kaplan collates its analysis of specific areas for improvement identified from 'neutral' or 'negative' survey responses received.

Two agents interviewed for this EER held Kaplan and the opportunities available to learners in high regard. No collated information was available to show agent satisfaction but this reflects that most agents have a global contract with Kaplan and formal feedback is sought from them and retained by the global head office. Any issues or feedback for individual schools are provided to the local sales team of the relevant region for follow-up, with principals involved if an operational matter.

Three homestay families interviewed for this EER were satisfied with the engagement they had from Kaplan, including an annual get-together facilitated for host families, which provided the opportunity for Kaplan and each family to engage with one another to understand host families' experiences. They indicated that they received excellent information from Kaplan.

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

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 **Excellent**.

Learners receive a high level of individualised support provided through well-established organisational processes and resources.

Kaplan demonstrates strong pastoral care to ensure that students are well looked after and have access to relevant information and services.

Students receive pre-departure information about Kaplan and living in New Zealand and a full-day orientation on arrival. Key information is provided, and a welcome pack includes relevant information about services, welfare and safety.

Students' individual needs are identified and accommodated. Issues and concerns about students are communicated to staff, agents and/or students' families in their home country, are recorded in the student management system, and are followed-through.

Students are supported in their learning by well-qualified and experienced staff. Kaplan's end-of-year survey for 2016 showed strong student satisfaction with the quality of teaching (averaging 4.46 as rated on a scale of 1-5 with 5 being excellent). Class sizes do not exceed 15 students.

Tutors meet with learners after their five-week testing to discuss individual results, progression, and support and motivational needs. Students interviewed for this EER identified variability with the process and felt that meetings were short – some teachers spend time providing this feedback after class, whereas others step out of the class to receive brief feedback during class time. Those who were taken out of class to receive feedback did not consider this ideal.

Individual reports are provided to each student about their progress. Actions are identified to support learning and progress through personalised study plans, additional support and/or resources to develop areas needing strengthening.

Kaplan's well-resourced study centre supports student learning, including responding to individual learning support needs that have been identified. The study centre is regularly reviewed through student feedback to ensure it is meeting needs. Students receive a study centre induction to ensure awareness and encourage use of the resources and support available.

Kaplan's learning tools support learners to be self-directed and to continue their learning outside of the classroom.

Student clinics are run for half an hour, four times each week and provide students with the opportunity to discuss any issues with the director of studies or head teacher, who raise any concerns with relevant staff to work towards their resolution.

Classroom issues, if repeating, may be responded to through staff engagement, professional development, and teaching observations. A Pathways Clinic, Attendance Clinic, and an Exams Clinic are also held each for half an hour every week. In-house country advisers/foreign language advisers are on site and available to support students in their learning.

The five-weekly student surveys provide another mechanism to ensure student satisfaction with their learning and the learning environment. The director of studies engages with staff about student survey feedback at regular meetings.

It is notable that Kaplan rated above the New Zealand and international average with regard to positive responses relating to the learning environment in the 2016 I-Graduate survey – overall satisfaction was 91.4 per cent, compared with the overall New Zealand average of 85.6 per cent.

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**.

Kaplan is led by a stable and effective leadership team. Staff are valued and their input used to inform organisational developments.

Teaching staff are supported to extend and develop their teaching experience in different courses, including through being buddied with experienced staff. In-house professional development is held five-weekly and responds to individual requests. Topics include support for teachers to develop in subject areas, presentations from external speakers, and support with writing test marking, the use of technology and the Kaplan learning methodology.

Peer teaching observations occur twice yearly and annual observations are undertaken by management. Observation also occurs to support new teachers or to review performance if any issues arise. A recent change has been to add a focus on teacher reflection to ensure teachers being observed have a key role in the process.

Staff development needs are identified through systematic processes of student feedback and evaluations, teaching observations, annual appraisals and performance reviews. Management responds immediately and effectively to any negative student feedback and to areas identified to support teaching practice and professional development.

Management meet with senior teaching staff weekly and meet academic staff every five-weeks. A whole of school meeting is held once every quarter, with the last quarter meeting focusing on a review of the year, including areas that have been improved and aspects that can be done better.

The principal regularly engages with governance at an Australasian level, and the director of operations in Sydney facilitates four-weekly meetings with principals from across the Australasian schools. Two face-to-face meetings occur each year, including to review staff feedback, student survey results, course offerings, overall services in the schools and general opportunities to enhance the learners' experience at Kaplan. One of these meetings is held at a different school each year, enabling direct insights into the operations of different schools and ongoing opportunities to share practice.

The director of studies (Auckland) actively supports teachers and meets five-weekly and face-to-face annually with the directors of studies from Kaplan's Australian schools to share academic matters and developments, and key and current issues and experiences. These meetings are facilitated by the regional academic manager (Australasia) who has a key interface with Kaplan's global team. Directors of Studies also attend relevant conferences annually.

Student satisfaction is central to the focus of management, and has been consistently high in the last few years. As stated in Findings 1.1, management has a good understanding of achievement at an individual learner level and learner satisfaction through student survey feedback, and through the director of studies' oversight of individual learners' progress. The evaluators considered that enhancing self-assessment information to provide evidence of the achievement of learners' objectives, learners' views on their English language improvements, and the contribution Kaplan makes to the development of learner skills and abilities, would strengthen the objective evidence available.

Resources are well allocated to support learning and teaching, as well as the piloting of new initiatives. The organisation has established key roles to support students' wellbeing and achievement. Students have access to diverse learning materials and resources, electronic whiteboards (in some classrooms), and quality IT equipment and online learning resources.

Following the previous EER in 2013, Kaplan introduced a practice of documenting self-assessment information for different focus/service areas within the school. The self-assessment summaries show further evidence of Kaplan's practice of closely examining student feedback for any negative comment, and a high level of responsiveness to individual concerns. The evaluators found the level of information, including action taken in the different summaries, to be variable.

It was not always evident from the self-assessment summaries whether actions implemented to improve have had the desired effect. Kaplan indicates that this is evident by issues not recurring. However, because some summaries contained extensive and documented information over several years, the evaluators considered that documenting end results would provide a more complete and coherent picture. Lifting some of the documented information to produce an annual snapshot of areas of improvement each year would also enhance the coherence of information.

Kaplan shared several examples of its ongoing focus on innovation and continuous improvement, including volunteering to trial Kaplan global initiatives, student services personnel now regularly meeting with counterparts from Australian schools to further relationships and share practice, and using recent I-Graduate survey results to identify areas to potentially enhance practice and learner experience.

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**.

Kaplan has consistently met English New Zealand audit requirements, and completes a self-attestation for English New Zealand annually. The 2015 and 2017 English New Zealand reports identify that Kaplan is compliant with New Zealand legislation and regulations (e.g. employment legislation, copyright laws and regulations, and relating to its premises).

Kaplan has attested to compliance with the Code of Practice. Kaplan's self-review identifies relevant evidence identified in support of compliance, but lacks additional detail or analysis of how effective Kaplan considers its compliance processes to be.

Kaplan's under-18 coordinator meets under-18 students once a month to monitor their wellbeing and satisfaction. Kaplan identifies that all homestays are police vetted. Under 18-year-old students are not placed in a homestay before that vetting process is complete. However, there have been some instances where students over 18 years of age are placed in homestays before vetting is completed in peak season and where there has been an accommodation need. Kaplan identifies that potential risks are mitigated as all homestays are visited and assessed by Kaplan prior to student placement (the welcome and five-week survey also ask students about their homestay). It would be useful if Kaplan's self-assessment demonstrated this analysis and key processes that give Kaplan certainty of the robustness of this approach.

While Kaplan reports issues with under 18-year-old students' wellbeing and attendance to their parents, and updates parents or guardians about the progress of students under the age of 18 if requested, it does not have a proactive process in place to communicate with parents or guardians about the progress in study of these students. Doing so would increase Kaplan's effectiveness in meeting the expectations of the Code of Practice, which requires that effective communications are maintained concerning the progress in study of under 18-year-old students.⁵ It would also ensure parents receive the same level of information, irrespective of their ability or knowledge to request it.

⁵ Clause 23(1)(c).

Kaplan surveys students to understand the accuracy of information provided to students by agents acting on behalf of the organisation. The wider Kaplan group provides agent destination and product training.

The evaluators sighted a comprehensive student handbook that clearly outlines requirements in relation to insurance and attendance. Kaplan has a robust attendance monitoring process in place requiring a minimum of 80 per cent attendance. Kaplan's student database captures key information relevant to the Code of Practice, and weekly reports are run to ensure students' visas and insurance are current.

Focus Areas

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

2.1 Focus area: Intensive 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 Students: Support and Wellbeing

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

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

Recommendations

NZQA recommends that ILA Education (NZ) trading as Kaplan International English:

- Add to its self-assessment system by:
 - Expanding information collected to provide evidence of learner achievement and the value of outcomes attained.
 - Developing self-assessment summary documents to enhance the consistency of information provided, document the impact of actions taken and any subsequent analysis, and to extract substantive information for year-to-year review.
 - Recording the frequency, outcomes, and actions, taken from external moderation, and actioning the recently defined internal moderation process for the two English language proficiency areas of writing and speaking.
 - Analysing and documenting the effectiveness of processes ensuring the management of important compliance accountabilities, including in relation to the Code of Practice and the current practice of sometimes using homestays before police vetting results are received for students over 18 years of age.
- Implement a consistent process for teachers' five-weekly engagement with learners to ensure all learners enjoy the same level of engagement from staff about their progress.

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/>.

NZQA

Ph 0800 697 296

E qaadmin@nzqa.govt.nz

www.nzqa.govt.nz