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# External Evaluation and Review Report



## Middle Earth Flying School Limited

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 20 August 2018

# Middle Earth Flying School Limited at a Glance

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*Middle Earth Flying School Limited trades under the name New Zealand Aviation and offers flight training courses from a small aerodrome near Waharoa in the eastern Waikato. It engages mainly with international students and a few domestic students.*

*Middle Earth Flying School (MEFS) provides courses in private pilot licences and commercial pilot licences along with training for the various pilot licence endorsements. MEFS is not certified under Part 141 of Civil Aviation Rules to carry out its own assessments.*

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Type of organisation:	Private training establishment (PTE)
Location:	Matamata Aerodrome, State Highway 27, Matamata
Code signatory:	Yes
Courses	<ul style="list-style-type: none"><li>• Commercial Pilot Licence and Multi-Engine Instrument Rating</li><li>• Commercial Pilot Licence (CPL)</li><li>• Multi Engine Instrument Rating</li><li>• Private Pilot Licence (PPL)</li></ul>
Number of students:	47 international, two domestic
Number of staff:	Nine full-time; five part-time
Scope of evaluation:	<ol style="list-style-type: none"><li>1. Flight programmes</li><li>2. International students</li><li>3. Governance and management</li></ol>
MoE number:	7140
NZQA reference:	C29094
Dates of EER visit:	6 and 7 June 2018

# Summary of Results

## **Not Yet Confident in educational performance**

- MEFS had satisfactory rates of achievement in 2017, although this was difficult to determine as there is no meaningful benchmarking against other similar providers. Achievement data for 2015 and 2016 was not available.
- MEFS' management lacks a consistent approach to running the school. Some management positions have been held temporarily or on a part-time basis.
- Efforts have recently been made to improve theory class outcomes.

## **Not Yet Confident in capability in self-assessment**

- Trainees are obtaining licences that enable them to gain employment. The long-term value of this is not known as there is no graduate employment data or feedback gathered from graduates and employers.
- There is only light engagement with industry and no evidence provided of wider engagement to identify needs or best practice.
- Trainers have appropriate flight instructor ratings, but generally have no adult teaching qualifications. There is a policy for teacher evaluation but no formal tracking of teaching skills.
- Students are encouraged to develop the personal attributes required to work in the aviation industry.
- Student feedback is gathered and reviewed at the end of each theory module, but there is limited tracking of improvements.
- Administrative systems have not kept pace with the recent rapid growth of international students.
- Adherence to the Code of Practice<sup>1</sup> needs strengthening, particularly in the areas of administering English language requirements and provision of pre-enrolment information.

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<sup>1</sup> The Education (Pastoral Care of International Students) Code of Practice 2016

# Key evaluation question findings

## 1.1 How well do students achieve?

Performance: **Adequate**

Self-assessment: **Adequate**

Findings statement:	Students at MEFS pass the programmes at a satisfactory rate. MEFS monitors individual progress closely but does not systematically analyse overall achievement data to understand how well it performs in comparison with other similar providers or to identify improvements.
Supporting evidence:	<ul style="list-style-type: none"> <li>• There is no benchmarking against the achievement rates of other providers. The provider does not know how well it is achieving.</li> <li>• MEFS sets achievement targets but there is no rationale for how these are determined. The targets have not been met.</li> <li>• The first -time pass achievement rates for 2017 are 89 per cent for the PPL and 60 per cent for the CPL. Figures for earlier years are not available.</li> <li>• MEFS is doing some analysis of theory test results and external flight examiner feedback to identify areas for development and greater attention.</li> <li>• The principal measure for student success in aviation training in New Zealand is a 'first-time pass'. Students can have up to three attempts to complete a module within a specified timeframe. Almost all students get through the programme in the end.</li> </ul>
Evaluative summary:	<p>MEFS would gain from making use of achievement data to identify areas of strength and weakness, which can be used to develop programme content and delivery.</p> <p>Benchmarking of achievement results against the results of similar providers would give MEFS an indication of how well it is performing relatively.</p>

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

Performance: **Adequate**

Self-assessment: **Adequate**

Findings statement:	MEFS is providing training that enables students to gain licences and employment in commercial aviation. But their success in doing this is unknown, as the PTE does not systematically gather or analyse information on graduate employment.
Supporting evidence:	<ul style="list-style-type: none"> <li>• International students who complete the programme can apply in their home country to have the New Zealand license ‘converted’ for local use on their return.</li> <li>• The certification can lead to a vocation of one kind or another in the aviation industry.</li> <li>• Students gain the technical skills, attitudes and disciplines required for employment in the industry.</li> <li>• The trainees and trainers are gaining necessary flight hours that contribute to the gaining of certification.</li> <li>• MEFS employs some of the local C-Cat<sup>2</sup> trainees.</li> <li>• There is a recognised career pathway and a current international demand for pilots.</li> <li>• The value of training is generally confirmed by looking at the feedback from graduates and employers. This information is not gathered by the provider, so the value cannot be verified.</li> <li>• There is a small amount of anecdotal feedback through social media and staff links with ex-students. Most students return to their home countries and so are difficult to track.</li> <li>• MEFS has not shown that it has constructive links with local industry. It does not use the services of stakeholders as a source of advice or to contribute to programme development.</li> </ul>
Evaluative summary:	<p>MEFS can do more to determine the value of its programmes.</p> <p>The provider would benefit from seeking expert external advice to inform its educational decision-making.</p>

<sup>2</sup> C-Cat is Category C Flight Instructor Rating – Aeroplane (in the case of MEFS, as it does not provide helicopter flight training).

### 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: **Adequate**

Findings statement:	The provider has made some useful developments in planning to improve programme delivery. The impacts of these changes are as yet unknown.
Supporting evidence:	<ul style="list-style-type: none"> <li>• Careful thought has gone into the recent restructure of the delivery of the programmes, particularly the theory part, to make it more accessible to the students.</li> <li>• The syllabus is standardised and is typical to that used throughout New Zealand flight training. The content is governed by the requirements of the CAA.<sup>3</sup></li> <li>• External agencies carry out the assessments for MEFS, and all moderation is externally managed.</li> <li>• There is a manageable maximum student-instructor ratio of 15:1 for theory classes. One-to-one attention is given when students require it. Flight instruction is one-to-one.</li> <li>• Close attention is given to flight training scheduling. Trainee programme achievement is carefully charted.</li> <li>• Self-directed learning is monitored by way of informal testing.</li> <li>• The CFI<sup>4</sup> is the only trainer with an adult teaching qualification. CAA does not specifically require that trainers have such qualifications. The instructors informally share ideas on teaching practice.</li> <li>• Tutor and student feedback contributes to the programme changes, but this is on an ad hoc basis and there is no documentation of the processes.</li> </ul>
Evaluative summary:	MEFS uses student and tutor feedback to make improvements to its delivery. This process needs formalisation and documentation, so that it can be tracked and accountability is maintained.

<sup>3</sup> Civil Aviation Authority

<sup>4</sup> Chief Flying Instructor

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

Performance: **Good**

Self-assessment: **Adequate**

Findings statement:	Student support at MEFS is generally good. Almost all the students are international students, and so the requirements of the Code of Practice apply.
Supporting evidence:	<ul style="list-style-type: none"> <li>• MEFS makes accommodation available for the international students. There is close monitoring of the accommodation conditions.</li> <li>• Trainee goals are recorded at the outset of training. Trainee progress towards programme achievement is closely monitored.</li> <li>• Trainees provide feedback at the completion of each module, and this is reviewed by the CFI, but it is not clear that this information is being analysed systematically or leading to meaningful improvements.</li> <li>• There has been some improvement in the pre-enrolment information. Students are provided with orientation to the school and to New Zealand, and general ongoing pastoral care is adequate.</li> <li>• Each trainee is assigned to an instructor who acts as a personal mentor. Five trainees are assigned to each instructor.</li> <li>• Additional ESOL<sup>5</sup> assistance has been organised for a couple of students who needed it.</li> <li>• There is special attention placed on the personal disciplines required for flying. These attitudes help to shape the professional attitudes of the pilots.</li> </ul>
Evaluative summary:	A more systematic approach is needed to implement self-assessment across the organisation. This will assist MEFS to identify and improve problem areas.

<sup>5</sup> English for Speakers of Other Languages

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

Performance: **Poor**

Self-assessment: **Adequate**

Findings statement:	Governance and management systems are inadequate, and improvements are required to the management of educational performance and compliance accountabilities.
Supporting evidence:	<ul style="list-style-type: none"> <li>• Significant growth in international students, from one in 2014 to 47 in 2018, has not been sufficiently planned for. While there are sufficient resources and facilities, administrative resources and management practices have not kept pace with the influx. MEFS intends to consolidate its activity at about 50 trainees.</li> <li>• Resources and facilities are adequate, and some work has been done to increase the number of aircraft and classroom space.</li> <li>• A high rate of staff and management turnover has destabilised educational and administrative processes. The chief executive and administration officer are effectively part-time, and these functions are not being given due emphasis.</li> <li>• The functions of a flight training school are being well managed, with qualified flight instructors and adequate resources. This does not extend to the educational functions of the school. The requirements of NZQA are not well understood.</li> <li>• There is a general lack of awareness of the Code of Practice, although recently appointed staff are reviewing requirements.</li> <li>• New buildings are being planned. This will give the students necessary class and leisure space.</li> <li>• Several of the recently revised documents have been ‘borrowed’ and rebranded from other flight training providers. This does not give confidence that the provider understands the regulations and policies contained in them.</li> <li>• Some of the recommendations of the 2014 EER have not yet been carried out. Governance and management may benefit from external advice on educational and administrative matters.</li> </ul>
Evaluative summary:	MEFS’ governance and management need to attend to the significant matters highlighted above to improve the functioning of the educational side of the school, with a focus on NZQA rules and the Code of Practice.

## 1.6 How effectively are important compliance accountabilities managed?

Performance: **Poor**

Self-assessment: **Poor**

Findings statement:	The management of educational compliance is a cause for concern. The focus for the provider is the flight training requirements and it has not emphasised NZQA compliance requirements until more recently.
Supporting evidence:	<ul style="list-style-type: none"> <li>• It was unclear who in the organisation was responsible for overseeing NZQA compliance matters.</li> <li>• Some compliance documentation has only recently come into use, such as the complaints register which was started in August 2017.</li> <li>• Other documents have recently been revised, such as the QMS<sup>6</sup> and the student handbook. These have been taken from another flight training provider and 'rebranded'. This does not confirm that MEFS understands and has taken ownership of the documents. There are some inconsistencies and variation of practice.</li> <li>• Understanding of the Code of Practice needs further strengthening, especially in the areas of providing information and recruitment processes. The contracting of recruitment agents is under review.</li> <li>• A review of a sample of the student files shows that important information is missing. Insurance and student visa dates do not always correspond with enrolment as they should.</li> <li>• There was confused knowledge of English language requirements for the courses. No IELTS<sup>7</sup> certificates were in the student files, but some were located later.</li> </ul>
Evaluative summary:	MEFS needs to take a more proactive approach to compliance. Knowledge of the Code of Practice and NZQA rules should be integrated into staff and management training.

<sup>6</sup> Quality management system manual – the register of current policies and procedures.

<sup>7</sup> International English Language Testing System – an entry requirement for international students

# 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

Performance: **Adequate**

Self-assessment: **Adequate**

## 2.2 Focus area: Flying courses

Performance: **Good**

Self-assessment: **Adequate**

## 2.3 Focus area: Governance, management and strategy

Performance: **Poor**

Self-assessment: **Adequate**

# Requirements

*Requirements relate to the TEO's statutory obligations under legislation that governs their operation. This include NZQA Rules and relevant regulations promulgated by other agencies.*

NZQA requires Middle Earth Flying School to:

1. Comply with all the requirements of the Education (Pastoral Care of International Students) Code of Practice 2016, including those that apply to the gathering and storage of the required international student enrolment documents. See:
  - [Guidelines for the Education \(Pastoral Care of International Students\) Code of Practice 2016 –Tertiary](#)
  - <http://www.legislation.govt.nz/regulation/public/2016/0057/latest/DLM6748147.html>

## Conduct of external evaluation and review

*All external evaluation and reviews are conducted in accordance with NZQA's published policies and procedures. The methodology used is described fully in the web document [Policy and Guidelines for the Conduct of External Evaluation and Review](http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction) available at: <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.*

### *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>8</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>8</sup> NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

# 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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