



Mana Tohu Mātauranga o Aotearoa  
New Zealand Qualifications Authority

# External Evaluation and Review Report

Enfield Holdings Ltd trading as  
Mainland Aviation College

Date of report: 1 February 2023

# About Mainland Aviation College

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*Mainland Aviation College trains mostly international and some domestic students to be certified commercial pilots, enabling them to work in the aviation industry worldwide.*

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Type of organisation:	Private training establishment (PTE)
Location:	Airport Drive, Waihola, Dunedin
Code of Practice signatory:	Yes
Number of students:	International: five (10 equivalent full-time students in 2021) Domestic: two (four equivalent full-time students) Māori, Pasifika and disabled students: nil
Number of staff:	Five full-time equivalents
TEO profile:	See NZQA: <a href="#">Mainland Aviation</a>  The Civil Aviation Authority of New Zealand (CAA) certified (Part 141) Mainland Aviation College in June 2019 to offer aviation training.
Last EER outcome:	NZQA was Confident in the educational performance and Confident in the capability in self-assessment of Mainland Aviation College (Mainland Aviation) at the last EER conducted in September 2016.
Scope of evaluation:	<ul style="list-style-type: none"><li>• All flight training</li><li>• International student support and wellbeing</li></ul>
MoE number:	7187
NZQA reference:	C45293
Dates of EER visit:	18 and 19 August 2022

# Summary of results

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*Mainland Aviation College meets many of the important needs of its students and industry. However, the PTE has not effectively managed some core regulatory requirements. Self-assessment information and processes vary in quality and do not review all key activities.*

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

- Mainland Aviation produces capable, certified, safety-conscious pilots, preparing them for airline or aviation work. Nearly all students gain CAA aviation certification that students and the industry highly value. However, only a minority seek or are awarded the New Zealand Diploma in Aviation (General Aviation) (Level 5), despite most students enrolling on this approved programme.<sup>1</sup>

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

- The design and delivery of the training match many of the important needs of students and industry. Nearly all students are effectively supported to complete their intended studies. Pastoral care is generally strong, effective and fit for purpose.
- Mainland Aviation leadership has only been partly effective in managing its core activities. The PTE is producing capable, certified pilots for the industry. This is achieved by appropriately qualified and experienced instructors providing sound training using suitable facilities and aircraft.
- However, Mainland Aviation has not effectively managed some core regulatory requirements. These include incorrectly awarding the diploma to 23 students, technically enrolling students on the diploma programme who primarily seek CAA certification, reporting only 33 per cent of the unit standards results on time, and holding insufficient records of its international students. The latter means Mainland Aviation has not sufficiently verified that all programme entry requirements were met.

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<sup>1</sup> The NZQA-approved programme is the Diploma in Aviation (Aeroplane) (General Aviation) (Level 5) (ID: 1161113). Hereafter this programme is referred to as 'the diploma programme' and the qualification as 'the diploma'.

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- Self-assessment information and processes vary in quality and do not review all key activities.

# Key evaluation question findings<sup>2</sup>

## 1.1 How well do students achieve?

Performance:	<b>Marginal</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>Nearly all Mainland Aviation’s full-time students are international students, mostly from India.<sup>3</sup> Full-time students typically enrol in the approved programme leading to the level 5 diploma. However, most primarily seek the internationally (and Indian) recognised CAA certifications.<sup>4</sup> Nearly all students gain this certification, but few seek and complete the diploma qualification. The diploma completion rate is therefore low. Students are acquiring the externally assessed, industry-level technical knowledge, skills and attributes required to become a commercial airline pilot.</p> <p>First attempt pass rates of CAA-approved assessments is the industry-accepted achievement measure for aviation training. EER sampling of the six-monthly review reports provided indicate that Mainland students likely achieve at just below or close to the national average. This is a sound result, given a student cohort of mostly international students; for many of them, English is not their first language.<sup>5</sup></p> <p>The self-assessment of achievement is variable. Individual student progress is well tracked; instructors use this data to support each student to achieve. Six-monthly reports review the theory and flight test pass rates; analysis over a longer period is not undertaken. Recommendations are made in these reports, but subsequent reports do not effectively evaluate their impact. These periodic reviews do not analyse the diploma completion rates, the proportion of students achieving their goals, and the time taken to achieve goals.</p>

<sup>2</sup> The findings in this report are derived using a standard process and are based on a targeted sample of the organisation’s activities.

<sup>3</sup> No students have identified as being disabled; nor have any domestic students identified as being Māori or Pasifika.

<sup>4</sup> See 1.6 for the compliance implications of this matter.

<sup>5</sup> Mainland Aviation did not separately analyse the achievement of the international and domestic students.

Conclusion:	Overall achievement is sound. However, the achievement information is not complete, and the review of achievement is variable.
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## 1.2 What is the value of the outcomes for key stakeholders, including students?

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>The key purpose of Mainland Aviation is to produce capable, certified, safety-conscious pilots who are well prepared for airline or aviation work in New Zealand, Indian or Pacific jurisdictions. Nearly all the full-time students develop the required capabilities and gain the necessary certifications. Industry stakeholders closely connected to the college rated well the capability of the students, the standard of training and the holistic care provided.</p> <p>There is sound and reasonable evidence of students gaining employment in the industry; however, this could be better tracked and analysed, although it is naturally challenging to track international employment outcomes. Mainland Aviation needs to formally track its domestic graduates to better understand the value of the training.</p> <p>Mainland Aviation, through its training business activities, economically contributes to the local region. Mainland Aviation also runs a private commercial charter business, keeping it current with aviation industry changes. This knowledge and experience enables the college to develop work-ready pilots for a range of working environments. Two local employers who were interviewed made favourable comments about a few local graduates they had employed. However, no systematic, ongoing feedback was collected from the graduates/exiting students and employers on the capability and work-readiness of Mainland Aviation trained pilots.<sup>6</sup></p>
Conclusion:	Mainland Aviation produces capable, certified, safety-conscious pilots who are prepared well for airline and aviation work. These are valued outcomes for its students and industry. The PTE is responsive to industry requirements. The self-assessment gaps are not significant.

<sup>6</sup> This is expected self-assessment for complying with NZQA Consistency Reviews.

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

Performance:	<b>Good</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>The training Mainland Aviation offers is effective in developing competent pilots. A CAA-prescribed curriculum and the external assessment of theory and flight tests verify the competency of the students. Mainland Aviation training has several key strengths. The Dunedin International Airport site has a long runway, an expansive area for ground movements, a flight control tower, and usually a low number of aircraft movements, enabling students to maximise their scheduled aircraft learning period.</p> <p>The Otago region offers students diverse and challenging physical flying environments. The instructors have the requisite ratings and industry experience; as Mainland Aviation graduates themselves, they are familiar with the learning challenges students face. Student feedback rates strongly the expertise and support the current instructors offer. Industry stakeholders comment that Mainland Aviation students tend to develop good procedural and aircraft handling skills through this real-world training experience.</p> <p>Mainland Aviation systematically tracks flight hours and the educational progress of the students. Its instructors offer students detailed and valued debriefs after flight instruction.</p> <p>On the other hand, while there are external English language requirements that international students must meet<sup>7</sup>, Mainland Aviation does not systematically assess the educational needs of students upon entry. This is despite some international students finding the training challenging and requiring more than one attempt to pass papers. Also, no current instructor (including the chief flight officer) has training beyond their CAA instructor requirements, such as additional adult education and literacy expertise or qualifications to better support these students. As already noted, the six-monthly reviews do not address the low</p>

<sup>7</sup> [NZQA](#) requires that students meet external language levels for entry. ASPEQ tests the oral English language competency of each student prior to its flight test.

	<p>diploma completions.<sup>8</sup> The reviews have not led to significant changes being made to the approved programme. A recent Ringa Hora<sup>9</sup> moderation report (the first for Mainland Aviation) identified some assessment issues that require attention. Mainland Aviation has actively engaged Ringa Hora to address these matters. These are all areas for improvement.</p>
Conclusion:	<p>The design and delivery of Mainland Aviation training match many of the important needs of students and industry stakeholders. There are areas that impact more on international students that require closer attention.</p>

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

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Mainland Aviation students are mostly highly motivated international students investing in high-cost vocational training. Nearly all students go on to complete their intended studies. Pastoral care is generally strong and effective. Mainland Aviation offers these young international students an ‘adult-boarding school’ like environment. It has an established relationship with a church-run hostel. Hostel management is police-vetted and offers on-site support and cleaning.</p> <p>Mosgiel offers students a small-town community where students are visible and known. The two directors/managers act in a pastoral oversight type of role, including offering students in crisis a live-in support option in their home. Students were effectively supported during the COVID-19 pandemic. Existing students support and informally socialise new students into the Mainland Aviation culture and expectations. The few domestic students are typically more independent but are offered the same level of pastoral care.</p> <p>The instructors are themselves school graduates, familiar with the learning and lived experience of being Mainland Aviation students. Students interviewed said all instructors build and maintain good relationships with the students. They encourage students to develop the required skills and closely monitor their</p>

<sup>8</sup> See 1.1 for details

<sup>9</sup> Ringa Hora (Services) is a workforce development council.

	<p>progress. The survey feedback was mostly positive, though it was not clear how some issues had been addressed. The survey response rate was not clear.</p> <p>Students in this small, close-knit school are vocal about their needs. However, those interviewed would value a formal student voice mechanism (beyond surveys) to periodically raise their concerns. The key concern is the processes used for communicating scheduling. A mostly sound gap analysis of the <a href="#">Code of Practice 2021</a> did not identify this gap. The 2021 Code attestation rated all outcomes as ‘well-implemented’; however, this was not well supported by evidence.</p>
Conclusion:	Nearly all Mainland Aviation students are effectively supported to complete their intended studies. Pastoral care is generally strong and effective. The review of student needs is sound, though a few areas need further attention.

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

Performance:	<b>Marginal</b>
Self-assessment:	<b>Marginal</b>
Findings and supporting evidence:	<p>The purpose of Mainland Aviation is to produce capable, safety-conscious, certified pilots able to gain work in the airline industry. The leadership has been successful, with nearly all students achieving their training goals.<sup>10</sup> However, as an NZQA-registered PTE offering training to international and domestic students, the leadership has not effectively managed some core NZQA regulatory requirements.<sup>11</sup> This is a significant performance and self-assessment gap.</p> <p>Mainland Aviation has a range of generally effective processes that contribute to it offering sound aviation training. The leadership has engaged instructors who are mostly appropriately qualified and experienced to instruct its students.<sup>12</sup> Instructors use data to address individual student training needs. The leadership has invested in fit-for-purpose facilities and aircraft</p>

<sup>10</sup> While the achievement data is not clear, some international students take longer and more attempts to complete the training. See 1.3 and 1.1 for details.

<sup>11</sup> See 1.6, 1.1 and 1.3 for details.

<sup>12</sup> However, they require some upskilling to better instruct ESOL (English for Speakers of Other Languages) students. See 1.3 and the recommendations for details.

	<p>fleet. It has met its critical CAA requirements. Mainland Aviation has financially and operationally managed the training (and charter) business throughout the COVID-19 pandemic, which has had major negative impacts, including closed borders preventing many international students enrolling.</p> <p>Self-assessment is mixed. The analysis of overall achievement, reviews of the approved programme and support for ESOL students all need strengthening. The latter gap was identified at the previous EER and has been insufficiently addressed. The self-review of compliance management has been inadequate.</p>
Conclusion:	Mainland Aviation leadership has been effective in managing many core activities. However, the primary concern is the PTE is not effectively identifying and addressing some core NZQA regulatory requirements, which has had significant impacts.

### 1.6 How effectively are important compliance accountabilities managed?

Performance:	<b>Poor</b>
Self-assessment:	<b>Poor</b>
Findings and supporting evidence:	<p>There was ineffective management of some important compliance accountabilities. These gaps were:</p> <ul style="list-style-type: none"> <li>The EER enquiry found that 23 students were incorrectly awarded the diploma on 17 and 18 February 2020. An ex-staff person had mistakenly reported these qualification completions. The unit standard results of these students had not been reported to NZQA, in accordance with <i>Rule 13.1(b) in Part 2 of the Consent to Assess against Standards on the Directory of Assessment Standards Rules 2021 (CAAS Rules)</i>.</li> <li>Some international students enrol on the diploma programme to gain the qualification. However, many need to enrol on this programme to gain a student visa, but primarily seek the CAA certification that enables them to gain entry to airline pilot training in an overseas jurisdiction.<sup>13</sup> Mainland Aviation has not effectively reviewed this programme, including its low qualification completions and the</li> </ul>

<sup>13</sup> A random sample of nine of these students from 2021 found, on average, seven had completed three-quarters of the NZQA-approved programme; two have returned to complete the diploma.

	<p>programme regulations.<sup>14</sup> This is a technical breach of <i>Criterion 7 in Part 1 of Rule 4.1 of the NZQF Programme Approval and Accreditation Rules 2021 (PAA Rules)</i>.<sup>15</sup> Mainland was aware of this enrolment issue in April 2021 but did not effectively address the matter.</p> <ul style="list-style-type: none"> <li>• The enrolment record management system is not effective. Evidence was missing from all 10 randomly sampled international student enrolment files, including accurate details that the programme entry requirements were met. This is a breach of <i>Rule 4.1 (g) in Part 1 of the PTE Enrolment and Academic Records Rules 2021 (PEAR Rules)</i>. Also, the records showed that the dates of visas, insurance and offers of place often differed. This is a breach of <i>Rule 4.1 (i) in Part 1 of the PEAR Rules</i> which says that accurate and up-to-date enrolment records must be kept for each international student.<sup>16</sup></li> <li>• Since 2018, only 33 per cent of unit standards results were reported within the required 90 days of the assessment taking place.<sup>17</sup> This is a breach of <i>Rule 13.1(b) in Part 2 of the CAAS Rules</i>.</li> <li>• Mainland Aviation has not kept current with the requirements for the NZQA programme approval and NZQA rules. Its internal quality assurance has not identified these errors.</li> </ul> <p>The following requirements were managed effectively:</p> <ul style="list-style-type: none"> <li>• The Civil Aviation Authority of New Zealand (CAA) audited Mainland Aviation College against Part 141 (Certification) in June 2019. Mainland Aviation was compliant with the civil aviation rules, with one minor non-compliance. This critical regulatory requirement was met.</li> <li>• Mainland Aviation reports there have been no significant health and safety incidents since the last EER.</li> </ul>
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<sup>14</sup> See 1.1 and 1.3 for further details.

<sup>15</sup> Refer also to the *Requirements* (pg. 15).

<sup>16</sup> Refer to this rule for details of the specific records required to be kept. Mainland Aviation has now revised its processes.

<sup>17</sup> This finding excludes the results of the 23 students noted in the first bullet point. Mainland Aviation has subsequently revised its processes.

	<ul style="list-style-type: none"> <li>• NZQA-required annual submissions were provided in a timely fashion.</li> <li>• A generally sound review of the Code has been undertaken.<sup>18</sup></li> </ul>
Conclusion:	There has been ineffective management of some important compliance accountabilities. Minimum standards were not met. Mainland Aviation has not kept current with key NZQA regulatory requirements.

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<sup>18</sup> See 1.4 for details

# Focus areas

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

## 2.1 Focus area: All flight training

Performance:	<b>Marginal<sup>19</sup></b>
Self-assessment:	<b>Marginal</b>

## 2.2 Focus area: International student support and wellbeing

Performance:	<b>Good</b>
Self-assessment:	<b>Marginal</b>

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<sup>19</sup> The ratings for performance and self-assessment reflect judgments reached using the NZQA [Guide to external evaluation and review for TEOs](#).

# 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 Mainland Aviation College:

- Analyse achievement in more depth, including domestic versus international student rates, the qualification completion rates, the proportion of students achieving their educational goals, the duration to achieve goals; and achievement trends over longer durations than six months.
- Assess the impact of recommendations made in the previous six-month education review.
- Provide fuller enrolment information to prospective students about the requirements of the NZQA-approved programme; and/or explore other NZQA-approved training options to better meet the needs of international students.
- Systematically assess upon entry the needs of students, and in particular the international students, including those for whom English is not their first language.
- Improve the adult education and literacy teaching capability of the chief flight officer (and the instructors) to more effectively instruct the many students for whom English is not their primary language.
- Develop a periodic mechanism to enable students to better voice their concerns to management.
- More systematically address issues identified in the student surveys.

# 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 Mainland Aviation College to:

1. Develop sound quality assurance procedures to accurately report unit standard results to NZQA within three months of the assessment date. This relates to *Rule 13.1(b) in Part 2 of the CAAS Rules*.
2. Develop an effective enrolment record management system to ensure:

- accurate details of the students meeting the programme entry requirements are kept, and kept up to date. This relates to meeting *Rule 4.1(g)* in *Part 1* of the *PEAR Rules*; and
  - for international students, that their visa (if any) and other immigration details, the contact details of any agent through whom the student enrolled at Mainland Aviation, a copy of the student health and travel insurances, student fee protection trustee records, and passport numbers are kept, and kept up to date. This relates to meeting *Rule 4.1(i)* in *Part 1* of the *PEAR Rules*.
3. Review the diploma programme (including programme regulations) to address the low qualification completion rate. As part of this review, formally consult with NZQA on the 2022 regulatory framework regarding possible options. This relates to meeting *Criterion 7* in *Part 1* of *Rule 4.1* of the *PAA Rules*.

# 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<sup>20</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>20</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.

## 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](http://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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