

Summary of feedback

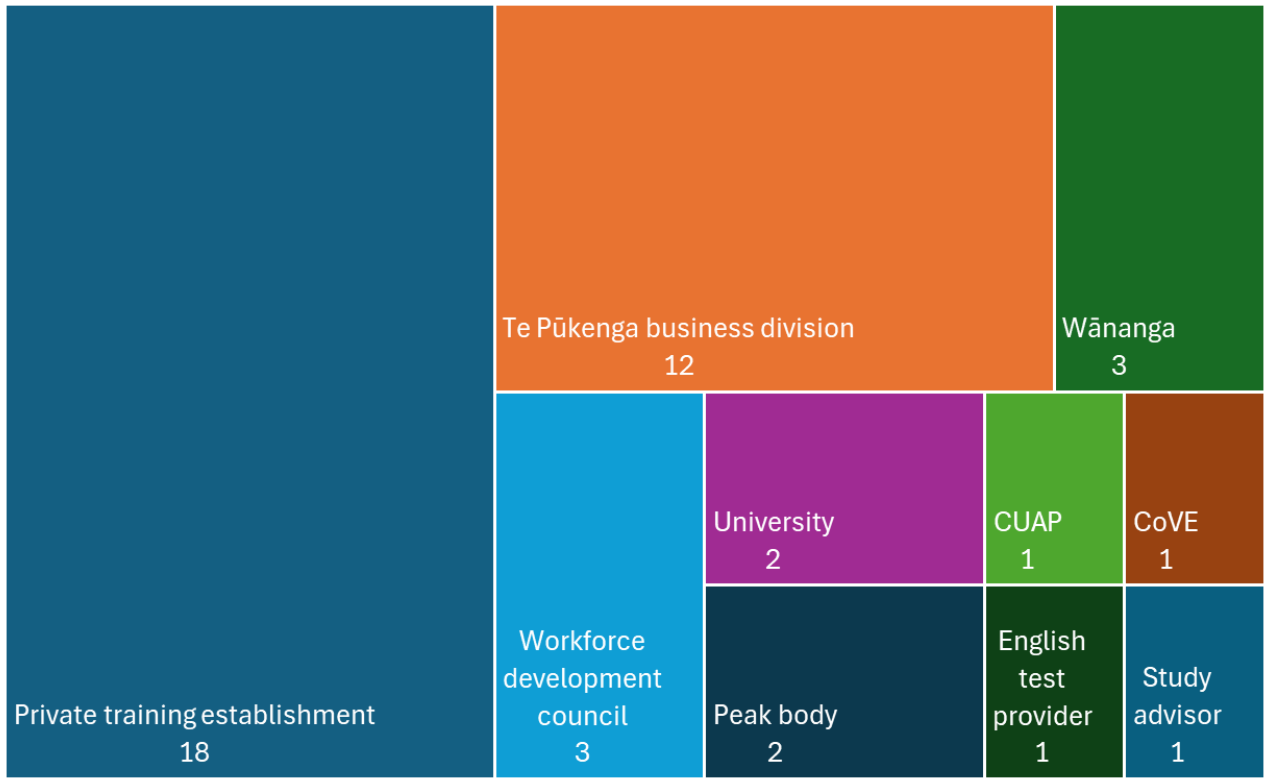


From consultation on Changes to the NZQCF and Rules

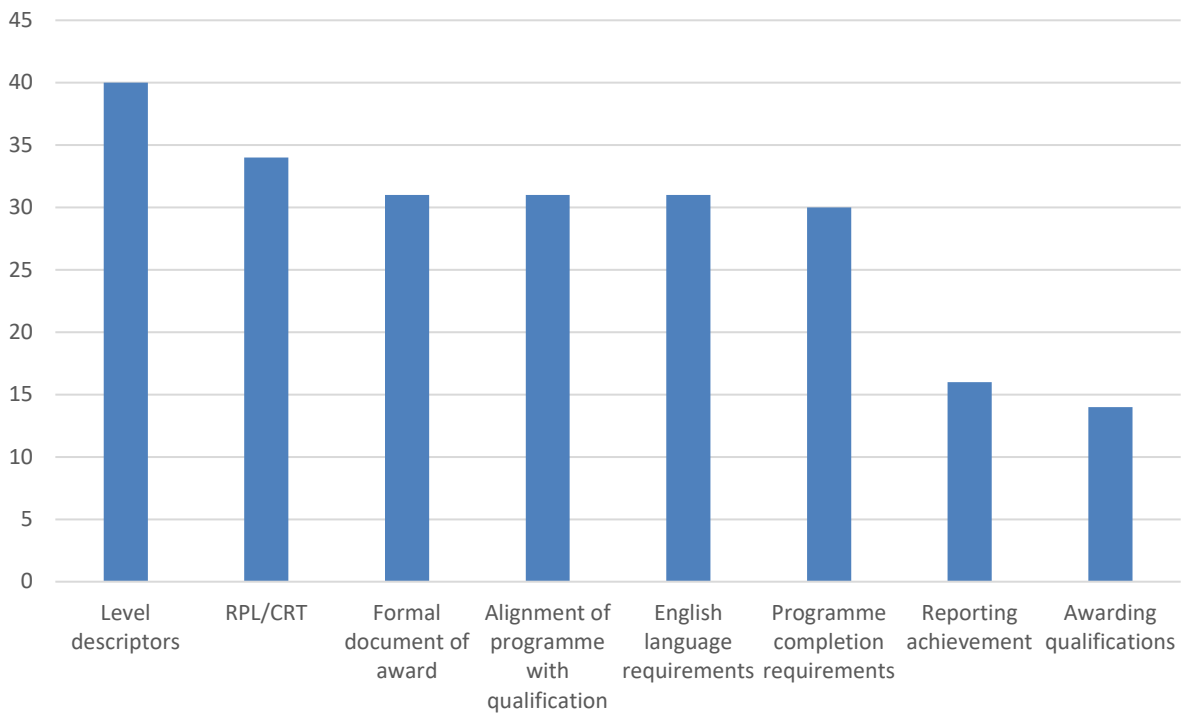
October – November 2024

44 responses to consultation

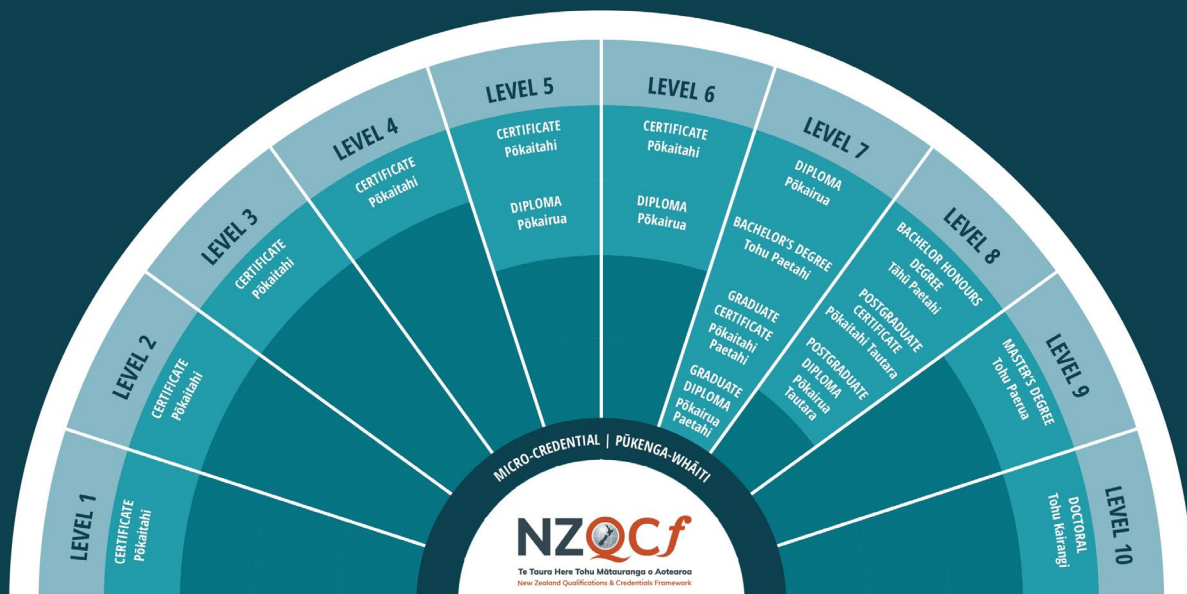
Respondents



Most commented on proposals



Updated visual representation



15 respondents provided feedback on the visual representation.

Overall respondents prefer the new diagram.

4 commented that it is harder to read and does not show progression, the boundaries between undergraduate and postgraduate qualifications, or the differences between qualification types at the same level.

4 commented that NCEA should be shown in the diagram.

3 commented that micro-credentials should be more obvious and clearer that they are at all levels.

There were also some comments on better use of colour and including a te ao Māori design.

Updated level descriptors

40 responses were received about the updated level descriptors.

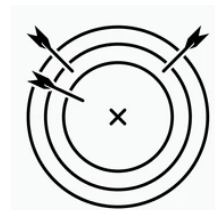
The updated descriptors and the inclusion of the transferable skills were generally well received.



16 respondents commented that the level descriptors are good, better than the current descriptors, have the right step-ups and provide more consistency.

68 comments noted issues or concerns about the proposed descriptors. This includes:

- not being clear or consistent
- being too detailed and prescriptive
- being ambiguous and open to interpretation
- being hard to apply
- certain descriptors not seeming to be at the right level
- some seeming to use wrong or confusing language
- not including other important skills and knowledge that a person may have or may need, such as cultural competency, literacy and numeracy, and intellectual formation.



In particular it was noted that Te Tiriti and mātauranga Māori were not explicitly included.

Concerns were also raised about what changing the level descriptors will mean for existing and new qualifications, programmes, micro-credentials and standards. Several respondents were concerned that qualifications and standards may change levels when assessed against the new level descriptors.



Updated qualification-type descriptions

10 comments that the descriptions are good and are clearer.



4 pointed out that the descriptions don't always align with the new level descriptors.

1 noted that the credit requirements for a Bachelor Honours degree varies between what is required for universities and other tertiary providers, with universities requiring some research-based credits at level 9.



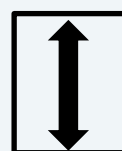
1 queried having credit requirements as part of the qualification description.



We also received a number of recommendations for minor wording changes and providing clearer definitions and explanations.

Micro-credential description

5 comments that micro-credentials need clear minimum and maximum credit values.



1 request that there be no credit requirements.



1 comment that micro-credentials should not be at levels 9 and 10.



There was also a suggestion to clarify the relationship between qualifications and micro-credentials.

NZQCF booklet

We received a number of suggested edits and clarifications for the booklet.

There were also several suggestions to make it more tailored to New Zealand, include Te Tiriti, use more te reo Māori and consider how mātauranga Māori is included in qualifications.

One respondent noted that the booklet is too long and could be shortened.

Another suggested that the information could be customised for specific audiences rather than cover everything in a single booklet.

Other comments on the NZQCF

There was strong agreement with the proposal to allow changes to the framework without waiting for the scheduled review, provided it is done with proper consultation. One caution was given – to make sure it does not add complexity. One respondent disagreed with this proposal, commenting that changes should only be made following a formal review.

Two respondents considered there is no visibility of Māori or of criteria that are distinctively New Zealand.

One respondent said the NZQCF is hard for individuals to relate to .

One mentioned that the framework should show where unit and skill standards fit.

Qualification and Micro-credential Listing and Operational Rules

The proposal to **clarify that qualifications and micro-credentials must align with the level descriptors** was generally well received with the caveat that it needs to have flexibility and allow for a ‘best fit’ approach.



16 comments were made about how not every descriptor will apply equally for every qualification, micro-credential, standard or learner, and NZQA was asked to provide guidance on how to align with the descriptors.

The proposal to remove the ability for qualification developers to award qualifications – where they are not also the provider – was welcomed, with most respondents agreeing that the **provider who delivered the programme should award the qualification.**



The requirement for a learner to **complete an approved programme in order to be awarded a qualification** received mixed feedback:

5 respondents agreed that a programme needs to be completed.



8 commented that a qualification should be able to be gained by accumulating the required standards or micro-credentials, or through granting credit (RPL or CRT), with no programme enrolment required.

1 commented that it was not clear how a potential ‘arranging training’ function might fit with this.



Qualification and Micro-credential Listing and Operational Rules

14 of 31 respondents consider the proposed **specifications for the formal document that certifies the award** of a qualification or micro-credential include appropriate information.



1 requested that the NZQCF reference number not be required.

3 agreed that the certification for New Zealand certificates and diplomas at levels 1 to 7 should be standardised.



4 say providers should be able to customise the certificates to a certain degree, to reflect themselves and their learners. One of these noted that the NZQA certificates are “ugly” and another said that it is too much information for a certificate.



16 respondents agreed that **all qualifications and micro-credentials that are awarded should be reported** and included on a learner’s New Zealand Record of Achievement, although it was noted that NZQA’s online reporting system is hard to use and there is a fee for reporting through it.

2 commented that it should be reported sooner than 4 months.

4 suggested aligning with TEC reporting.

1 disagreed with the proposal, noting that some learners are not seeking, therefore should not be given, formal awards or recognition of their learning.



Programme Approval, Recognition and Accreditation Rules

18 respondents commented that being explicit that a **programme aligns with the qualification it leads to** makes sense, has always been the case, and will be clearer by being stated in the rules.



However, it was noted that not all of a programme is necessarily at the level of the qualification, and the rules should allow for a programme to have more credit if needed and for some credit to be under or above the level of the qualification to allow for scaffolding.



One comment was that credit value isn't a simple mathematical formula.

Over half of respondents agreed that **requirements for completion** should be included in a programme.



Objections included:

- ✧ It is not necessary as all components should be mandatory and there is no value in adding completion requirements.
- ✧ A programme should not need to be completed if the graduate profile outcomes for the qualification are met.
- ✧ Providers need discretion to waive mandatory requirements for specific learners.
- ✧ It is hard to set completion requirements for degrees and English language courses.

English language proficiency

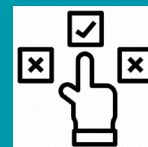
- 31** submissions made about changes to the English language proficiency requirements – most positive.
- 3** did not agree with requiring tests to be taken in a test centre and asked for online tests to be accepted.
- 3** did not agree with requiring all tests to be verified, as this will create additional work.

Other suggestions were:

- ✧ The current requirements are too low.
- ✧ Work-based learning should be excluded.
- ✧ NZQA's requirements should align with the Teaching Council's.

The most common feedback was that providers need discretion to not accept some tests or types of evidence, or to require higher scores, in certain circumstances.

One respondent provided information about the Swedish secondary school English subject score of 6 (not 7) being adequate for entry into universities in Sweden and the UK.



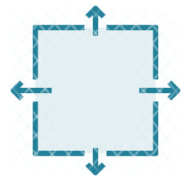
Granting credit by CRT and RPL

2nd most commented on proposal

Responses showed a variety of reasons for doing CRT or RPL, such as:

- ✧ Assessing work-based learning against a qualification.
- ✧ Assessing an overseas qualification against a New Zealand one for licencing or work requirements.
- ✧ Recognising credit gained from an overseas partnership arrangement towards a New Zealand qualification.
- ✧ Awarding “unspecified credit” for learning.
- ✧ Recognising a learner's past attainment when standards, programmes or qualifications change version.

Some of these approaches are outside the parameter of granting credit towards a programme.



10 of the 34 responses agreed with the proposal as set out.

5 respondents raised concerns that it would make RPL harder to do, cause it to be used less and increase approval times.

6 suggested that where a provider has the same CRT/RPL policies across all their programmes, they shouldn't need to submit the same information for each programme.

We also received suggestions to set a clear framework for CRT and RPL that includes processes for assessing and validating workplace-based learning and sets limits on how much of an overseas qualification can be credited to a New Zealand one. This framework should be based on international standards and align with universities' policies.



Te Hono o Te Kahurangi self-reflective



The main comment for the proposal to include a self-reflective summary was that this should not need to be submitted each time if it is the same information.

- 1** suggested having a standardised template.
- 1** suggested requiring a self-reflective summary for all applications, not just for Te Hono o Te Kahurangi.

Other rule changes

No concerns were raised on the other proposed rule changes.



It was noted that universities should not be excluded unless there is a good reason to do so and that the same rules should apply for all.



Other feedback not related to proposals

We also received feedback not directly related to the proposals.

- 6** respondents suggested that the qualifications and credentials framework should include other credentials, in addition to qualifications and micro-credentials.
- 3** suggested reviewing the micro-credential rules.

We received requests for NZQA to provide:

- ✦ Support for providers to transition to new requirements.
- ✦ Support for providers to develop RPL capability, degree apprenticeships, industry-education partnerships and flexible assessment approaches.
- ✦ Information on NCEA and UE equivalency for overseas secondary schools.
- ✦ Guidance for providers developing programmes on good practice for engaging with Iwi.