



Finalising the design of the integrated quality assurance framework

August 2025



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#### Introduction

From October to December 2024, we consulted you on a new integrated Quality Assurance Framework (iQAF) that included:

- the quality assurance cornerstones that set out roles and responsibilities
- the enablers which underpin a supportive and responsive regulatory environment encouraging compliance and continuous improvement
- the levers and related regulatory activities for NZQA to effect change where this is needed.

A copy of that consultation document and information on the submissions can be found here:

- Find out more about the proposed integrated Quality Assurance Framework (iQAF)
- Read the summary of submissions [PDF, 498 KB]

Overall, the high-level design for iQAF and its key components were well-received, with many submitters interested in the next layer of detail on how the new framework will work in practice.

### Purpose of this consultation

This document:

- (i) provides more detail and seeks feedback on the Approve, Self-Review, and Monitoring levers
- (ii) confirms some of the matters that we set out in the October consultation document
- (iii) proposes changes to Rules to support iQAF and the implementation of the Government's Vocational Education and Training reforms.

In Part One we set out the detailed design for the iQAF levers and activities. There are questions throughout the document where we are keen to have your input. However, you are welcome to comment on any aspect of the framework should you wish to. Appendix 1 lists all the questions.

The Education and Training Act 2020 (the Act) enables NZQA to make rules which set out in more detail the requirements to be met to comply with provisions in the Act. Throughout the document we indicate any matter that could be reflected in

new or amended Rules for your feedback. Part Two indicates the proposed scope of the Rule changes to support iQAF.

We also set out in Part Two the Rule changes required to support the Vocational Education and Training reforms, and to address some other matters.

Please note that Te Hono o Te Kahurangi, a quality assurance framework based in Te Ao Māori, is not part of this consultation and will be reviewed separately.

### Summary of key changes

- 1. The External Evaluation and Review (EER) process will be phased out. No new EERs will be conducted from 1 January 2026.
- 2. The Assuring Consistency function will be phased out. No consistency reviews will be conducted from 1 January 2026.
- 3. Monitoring of TEO practice for ensuring the safety and wellbeing of learners will be integrated with other quality assurance activities.
- 4. All TEOs will be required to submit a self-review summary report and participate in an annual conversation with NZQA.
- 5. Quality assurance activities will be informed by risk assessments.
- 6. New or amended Rules to support the implementation of iQAF and the Government's Vocational Education and Training reforms will be in place in early 2026.

### How to have your say

NZQA seeks written submissions on the proposed Integrated Quality Assurance Framework by Friday 26 September 2025.

You can respond:

- Online: <a href="https://nzqa.au1.qualtrics.com/jfe/form/SV\_ezbWjniKDfG1efQ">https://nzqa.au1.qualtrics.com/jfe/form/SV\_ezbWjniKDfG1efQ</a>
- Email: Send your submission as a Microsoft Word document or searchable PDF to QAFredesign@nzqa.govt.nz.

Once submitted, your information will become a formal record for this consultation.

If you have any questions about the submissions process or would like to provide your feedback in another way, please contact us at the above email address.

#### Use of information

The information provided in your submission will be used to inform the development of the integrated quality assurance framework. All personal information you supply to NZQA in either an online or written submission will only be used to help finalise the design of the iQAF. We will retain this information in accordance with NZQA policies and processes.

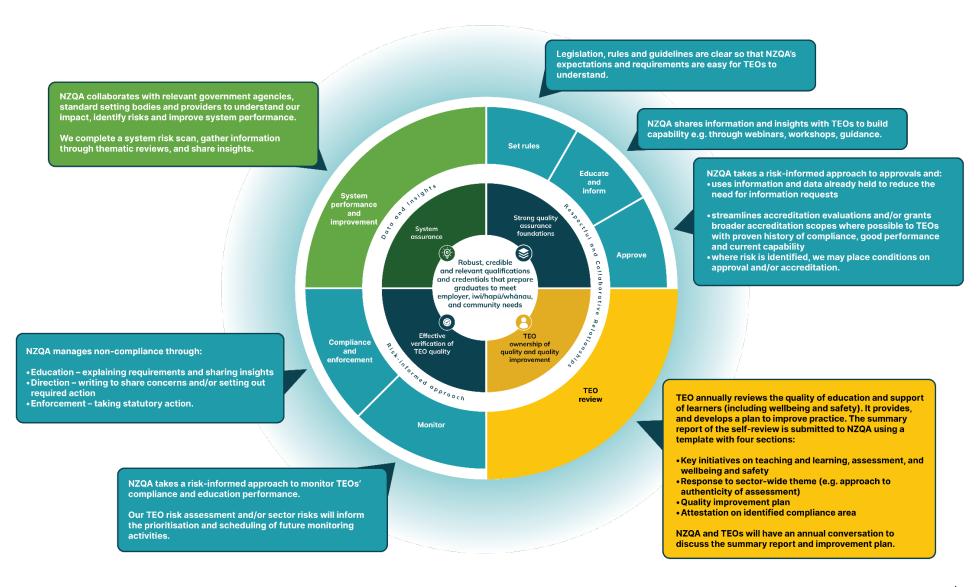
NZQA will not use or disclose your personal information without your consent, unless authorised or required by law. We may contact you directly if we require further clarification of any matters in your submission. Your submission may be publicly disclosed in official documents or as required by the Official Information Act 1982.

If your submission contains any information that is confidential, or you do not want us to publish, then in your submission please include 'CONFIDENTIAL' for the relevant information with an outline of any objection you or your organisation may have to the release of information. Please identify which parts you consider should be withheld, along with the reasons for doing so.

Please indicate clearly if you do not wish your organisation name to be included in official documents that NZQA may publish.

For further information on how your information is managed, please visit  $\underline{NZQA's}$  website.

#### Diagram 1: iQAF levers and activities at a glance



# Part One: iQAF levers and activities

#### Overview of iQAF levers and activities

As we received general support for the high-level design for iQAF in the first consultation, we have retained the cornerstones, enablers and levers. We have now developed the activities under each lever. Diagram 1 (above) summarises the activities and more detail is provided in the following sections.

The iQAF cornerstones, enablers and levers work as one coherent and integrated mechanism to provide confidence that learners are achieving robust, credible and relevant qualifications and credentials that prepare them to meet employer, iwi/hapū/whānau, and community needs in New Zealand and internationally.

Integration is reflected between activities, between the iQAF components, and between key players such as NZQA, providers, standard setting bodies (SSBs) and agencies.

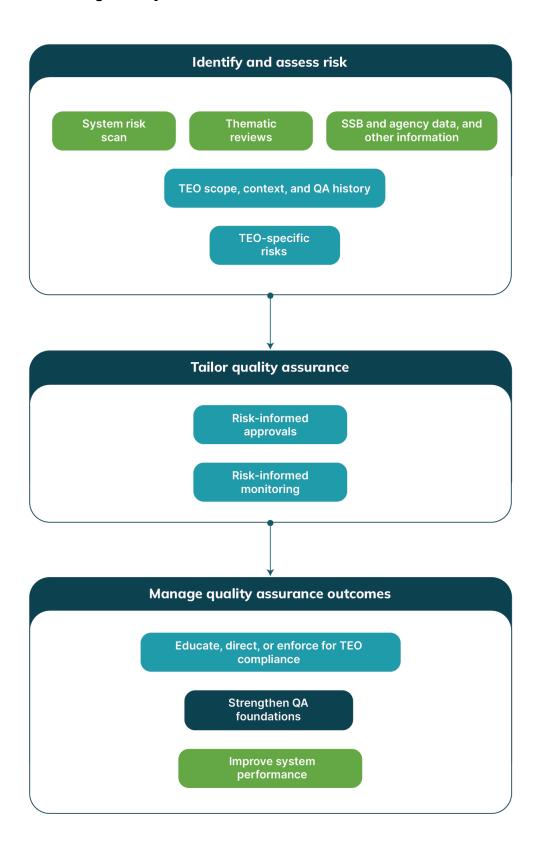
At the system level, we work with agencies, SSBs, providers, and learners to identify trends, changes, and potential risks through system risk scans and thematic reviews, and through monitoring the use and relevance of qualifications and micro-credentials.

Insights gained at the system level, together with contextual information of individual providers, help us prioritise our quality assurance activities and tailor them for different tertiary education organisations (TEOs).

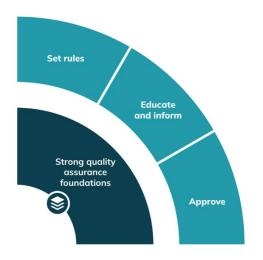
We will use the outcomes of quality assurance activities to improve the performance of individual TEOs, and/or strengthen quality assurance foundations through improving rules, guidance, and processes. We will also share any insights gained from the analysis of quality assurance outcomes with providers, SSBs, and agencies to improve the system together.

Diagram 2 below illustrates the integration and interconnectedness between the activities, levers, enablers and cornerstones of iQAF.

Diagram 2: An integrated system



### Strong quality assurance foundations



NZQA will put in place strong quality assurance foundations by:

- setting clear rules
- educating and informing TEOs
- taking a risk-informed approach to approvals.

#### **Setting rules**

The Act enables NZQA to set rules. Rules provide more detail of how the requirements in the Act are to be met.

For example, section 344 of the Act allows a body corporate to apply to NZQA for registration as a Private Training Establishment (PTE) and sets out the broad requirements that the applicant must meet.

The Private Training Establishment Registration Rules 2025 then prescribe the process for, and the information required in, an application for registration as a PTE.

All NZQA's rules (except the Assessment Rules for Schools) must be approved by the NZQA Board and the Minister of Education.

#### Our rules will:

- meet the published standards for secondary legislation
- be able to be grouped and accessed by TEO type and/or function/topic
- be regularly reviewed to ensure alignment with the evolving needs and priorities of the government and the sector
- be supported by guidelines written in an easy-to-follow format and in plain English.

NZQA has already implemented many of the Parliamentary Counsel Office's standards for secondary legislation and will continue to do so. We are also in the

process of implementing some of the newer requirements, such as those published in July 2025.

#### **Educate and inform**

NZQA will share information and insights to support TEOs to operate effectively and make informed decisions aligned with NZQA Rules and good practice.

We will use this function to address system risks and when we want to guide TEOs to better understand our expectations and requirements.

While currently we don't manage this as a specific function, in future we will take a planned approach identifying system and individual TEO needs.

We will prepare and run webinars and workshops, publish insights papers, examples of good practice, guidance, and develop training materials for NZQA's Learner Management System.

#### Approve

Improving our approval and accreditation approaches will be progressed in stages. The first changes can be made within the legislative framework set out in the Act and NZQA Rules. We will start with simplifying some approval and accreditation processes.

#### Simplifying approval and accreditation processes

We will simplify the programme approval process for qualifications that comprise skill standards. This supports the policy intent that skill standards will be used to support consistent graduate outcomes and portability of learning.

For TEOs with a positive compliance and performance history, and evidence of ongoing capability in a particular subject or topic, we will streamline accreditation processes for micro-credentials and programmes within that subject or field.

We will continue to streamline consent to assess against standards, including where the standards form all or part of a programme, or a micro-credential, for which the TEO is granted accreditation.

We will use information available in our system to reduce the need for multiple requests for the same information or for information already held by other education agencies. Examples of data we need that we can access through other sources available to NZQA are annual enrolments, completions, SSB moderation data, and organisational charts for all providers.

Future approval processes will be informed by current and accurate information about a providers' performance, capability, and capacity.

We want to reduce the number of requests for information (RFIs) needed to approve an application. This is a shared responsibility between NZQA and TEOs:

- NZQA will contribute with clear rules and guidance, consistent practice, sharing information on common causes for RFIs, and declining poor-quality applications.
- TEOs can contribute by clarifying any requirements before applying and ensuring that applications are high-quality.



### **Question**

1. Do you agree with the proposals to simplify approval and accreditation processes? If not, what would you change?

# TEO ownership of quality and quality improvement



To maintain and improve quality requires a TEO to periodically, systematically and authentically:

- review the quality of the education delivered, the effectiveness of its internal quality assurance systems and practice, and the outcomes learners achieve
- identify areas for improvement and the effectiveness of actions taken.

TEOs have an important role in maintaining the credibility of the qualifications system through the quality of the education and training delivered, and support to learners.

The TEO annual self-review summary report provides a structured framework for the TEO to share relevant information with NZQA following a review of its own performance and internal quality assurance practice. It forms the basis of an annual professional conversation between NZQA and the TEO.

As a cornerstone of the iQAF all TEOs will be required to:

- conduct an annual self-review
- submit a succinct summary on an NZQA template
- participate in an annual conversation with NZQA.

The summary report and subsequent conversation provide an opportunity for the TEO and NZQA to come to a shared understanding of the strengths and challenges the TEO is addressing, and the actions the TEO is undertaking to address these.

#### **TEO Self-Review Summary Report**

Each year the TEO will submit a brief summary report to NZQA to:

- demonstrate how well the TEO understands the quality of the education delivered (teaching, learning, assessment and learner support and wellbeing), the effectiveness of its internal quality assurance systems and practice, and the outcomes learners achieve
- identify areas for improvement in a quality improvement plan
- confirm it is meeting specified requirements of NZQA rules and the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 (the Code).

TEOs will also be asked to describe their practice on a specific theme to contribute to thematic reviews (see page 29) via their self-review summary report.

Information from the thematic reviews will be:

- analysed to inform NZQA's understanding of practice across the system and identify system risks and opportunities; and
- the findings reported back to the sector.

A draft TEO review report template is provided in Appendix 2.

#### **Annual conversation**

In preparation for an annual conversation with each TEO, NZQA will review the information it holds about a TEO including the summary of previous annual conversations and associated improvement plans.

Having synthesised information on the TEO and considered the TEO's self-review summary report, NZQA will arrange a conversation with the TEO. The aim of the conversation will be to discuss:

- the TEO's education performance over the previous year
- challenges and progress on any improvements identified in the TEO's previous self-review; and
- TEO priorities for the coming year.

The conversation will be conducted between at least two representatives of the TEO e.g. the Chief Executive and the Quality Assurance Manager, and an NZQA staff member.

Following the conversation NZQA will prepare a succinct summary which will be shared with the TEO within an agreed timeframe.

#### Integrating monitoring of the Code into Self-review

Monitoring of learner wellbeing and safety practices will be achieved through a range of activities including programme monitoring, thematic reviews, and the annual TEO self-review report and conversation.

The requirements to undertake a self-review of their giving effect to the Code will be met as part of the ongoing organisational self-review, in which the TEO will:

- identify key Code-related improvements in their quality improvement plan
- attest that:
  - o a self-review of the organisation's performance against the Code has been undertaken; and
  - the resulting self-review report, including complaints and critical incidents data, is available in an accessible format to learners, staff, and the public, on the organisation's website.

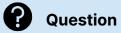
#### NZQA will:

- include the Code as a prompt question in the annual conversation
- periodically conduct thematic reviews on aspects of the Code, e.g.
  - accommodation standards
  - o international learners (i.e. Code signatory requirements)
- include learner support and wellbeing in other education performance monitoring (e.g. monitoring of programmes and micro-credentials).

#### **Transition matters**

Our Rules will reflect that TEOs will be required to submit self-review reports in 2026. We will work with TEOs to determine a submission and engagement schedule, including for those new entities established as a result of the Government's changes to the vocational education and training system.

For new PTEs a start date for submission of the self-review report will be agreed as part of the registration process.



2. Do you agree with the proposed self-review process? If not, what would you change?

# **Effective verification of TEO quality**



#### NZQA:

- takes a risk-informed approach to monitoring compliance and education performance
- manages non-compliance through educating, directing and, where necessary, enforcing.

Verification of TEO quality is how we provide confidence to learners and their whānau, employers, funders and other stakeholders of the quality of education delivered.

We will take a more integrated risk-informed approach to monitoring of TEO compliance with NZQA rules and of TEO education performance. Our approach will differentiate TEOs by their context, previous monitoring outcomes, and current risk profile. The risk assessment will operate at a system and individual TEO level (see the section on a risk-informed approach).

At a system level we will use other levers within the iQAF, such as system risk scans and thematic reviews (see pages 28 and 29), to identify trends and risks early on so they can be effectively and proactively managed by NZQA and TEOs.

At an individual TEO level, we will use the TEO's compliance information, along with its previous educational performance outcomes, scope of delivery and the context it operates in, to prioritise and schedule monitoring activities.

We will strengthen our analysis of data, and act assertively in response to confirmed performance issues, and use our statutory powers where appropriate.

There are two main functions to this cornerstone:

- monitoring
- compliance and enforcement.

#### Monitoring

NZQA is responsible for monitoring and regularly reviewing the standards for qualifications in tertiary education, either generally or in relation to a particular organisation, programme or micro-credential (S433 of the Act).

We meet this responsibility by specifying criteria in Rules that organisations must meet to:

- develop or deliver education and training leading to a micro-credential or qualification listed on the New Zealand Qualifications and Credentials Framework (NZQCF)
- assess against standards listed on the Directory of Assessment and Skill Standards (DASS)
- maintain approval and/or accreditation to deliver education and training and/or consent to assess.

We also administer the Code to make sure that learners enrolled with New Zealand education providers are safe and supported.

The overarching purpose of monitoring is to verify that the award of microcredentials and qualifications listed on the NZQCF is underpinned by quality teaching, learning, assessment and learner support.

We propose two categories of monitoring under iQAF – *compliance monitoring* and *education performance monitoring*.

#### Compliance monitoring

Compliance monitoring focuses on whether TEOs comply with the requirements of the Education and Training Act 2020, NZQA Rules and the Code including (but not limited to):

- the data and reporting requirements, e.g. learner data, credit reporting, selfreview submission, Code publication and reporting requirements
- TEO sites, financial returns, quality management systems, record keeping, assessment sample retention
- additional requirements to maintain registration as a PTE, e.g. governing members, Student Fee Protection audits, quarterly attestations.

Compliance monitoring will be undertaken annually (or at a frequency stipulated in the NZQA Rules) through desk-based analysis of information available to NZQA. Compliance monitoring may also occur outside of the annual cycle, where NZQA has concerns about TEO compliance.

As part of the annual self-review TEOs will continue to attest to their compliance with these requirements.

Many compliance requirements are set out in the PTE Registration Rules or, for other provider types, the Quality Assurance (including EER) Rules. We propose to review these Rules and develop a common set of relevant compliance requirements for all types of TEO delivering education. These Rules will establish the minimum expectations for a capable education providers with robust quality management systems, using self-review to continuously improve.

#### Education performance

Education performance monitoring is the specific monitoring of the quality of education and training leading to a qualification or micro-credential on the NZQCF provided by an individual TEO. It will focus on one or more of the following:

- the programme/micro-credential is delivered as approved
- the programme/micro-credential is reviewed as per NZQA Rules
- assessment practices are fair, valid and consistent
- learner wellbeing and safety is supported.

In addition to quality criteria set out in NZQA Rules, we intend to publish a reduced number of <u>tertiary evaluation (quality) indicators</u> along with other guidance to provide examples of good education performance.

The priorities and scheduling of education performance monitoring will be informed by the risk-informed approach described on page 31.

Monitoring will differ from current practice in terms of frequency, volume, and/or depth. The differences will vary depending on the type of education and training the TEO is delivering and NZQA's risk assessment. Three examples are set out below.

# Example 1: Degrees, graduate certificates and diplomas, and postgraduate qualifications

The overall frequency of NZQA monitoring will be less in future. TEOs are encouraged to undertake annual programme evaluations, following their internal process as part of their overall quality management system.

**Currently** our monitoring of a new programme starts after the first year of delivery and thereafter continues annually.

In **future** we will move to a less frequent monitoring system but one that we are confident will maintain the required performance standard. All degrees, graduate certificates and diplomas, and postgraduate qualifications will follow the same monitoring approach. There will be no separate processes or approaches to distinguish between NZQA monitoring or self-monitoring status.

At the end of the **first year** of delivery following programme approval the system will remain the same:

- The TEO prepares a programme evaluation report
- NZQA staff and an appointed external monitor will undertake a site visit
- NZQA prepares a monitoring report.

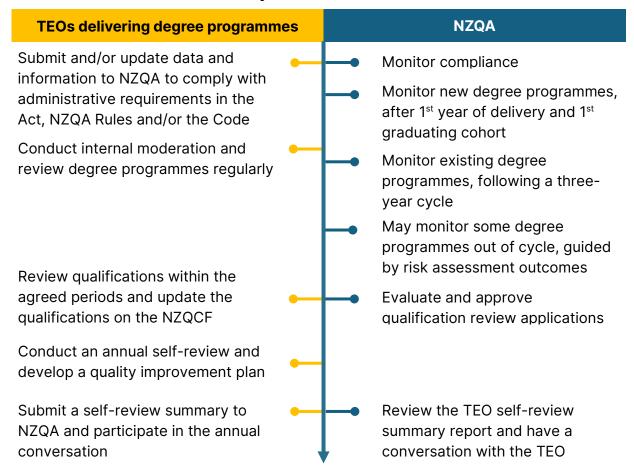
NZQA monitoring will then next occur when the 1<sup>st</sup> cohort graduates (where this differs from the 1<sup>st</sup> year).

NZQA will thereafter schedule programme monitoring every three years.

Approximately 13% of TEOs offer one or more degree programmes. The diagram below shows what quality assurance may look like for them each year. The activities are not arranged chronologically.

Diagram 3: Quality assurance for TEOs delivering degree programmes

#### **Quality Assurance Activities**



# Example 2: Programmes leading to qualifications at Level 1-6 and level 7 Diplomas

**Currently** our monitoring primarily focuses on assessment and moderation practice, typically in programmes without standards. This is because, where programmes include standards, the standards are subject to moderation by the relevant SSB.

In **future** the frequency and depth of sub-degree monitoring will be informed by a risk assessment.

The focus will be on one or more of the programme approval and accreditation criteria as set out in the Programme Approval, Recognition, and Accreditation Rules.

For programmes with standards, we will monitor:

- SSB national external moderation (NEM) outcomes; and/or
- the programme, depending on the outcome of a risk assessment.

For programmes without standards, we will:

- moderate assessments; and/or
- monitor the programme, depending on the outcome of a risk assessment.

We will monitor newly approved programmes after the first graduating cohort, guided by the outcome of a risk assessment.

About two-thirds of the TEOs deliver programmes leading to sub-degree qualifications at Levels 1-7. Diagram 4 below describes what quality assurance may look like to them each year. The activities are not arranged chronologically.

Diagram 4: Quality assurance for TEOs delivering sub-degree programmes

#### **Quality Assurance Activities TEOs delivering sub-degree programmes** NZQA Submit and/or update data and Monitor compliance information to NZQA to comply with administrative requirements in the Act, NZQA Rules and/or the Code Conduct internal moderation and review sub-degree programmes regularly Monitor NEM outcomes; Participate in NEM by SSBs moderate assessments, and/or monitor programmes, guided Conduct an annual self-review and by risk assessment outcomes develop a quality improvement plan Review the TEO self-review Submit a self-review summary to summary report and have a NZQA and participate in the annual conversation with the TEO conversation

#### **Example 3: Micro-credential monitoring**

**Currently** we monitor a very small sample of micro-credentials delivered.

In **future**, micro-credential monitoring will be informed by a risk assessment. The risk assessment will consider the following factors among others:

- whether the micro-credential includes standards that are subject to national external moderation by SSBs
- the total credit value of the micro-credential
- whether the micro-credential is part of a programme leading to a qualification.

For micro-credentials with standards, we will monitor:

- SSB national external moderation (NEM) outcomes; and/or
- the micro-credential, guided by the outcome of a risk assessment.

For micro-credentials without standards, we will:

- moderate assessments; and/or
- monitor the micro-credential, guided by the outcome of a risk assessment.

For micro-credentials that are part of a programme leading to a qualification we will:

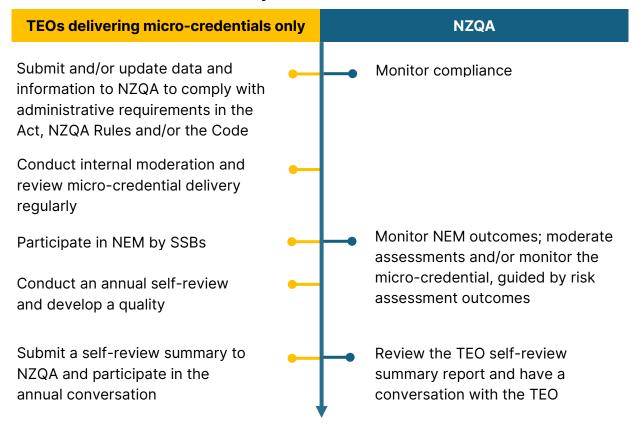
monitor with the programme, guided by the outcome of a risk assessment.

We will monitor newly approved micro-credentials after the first graduating cohort, guided by the outcome of a risk assessment.

About a quarter of TEOs only deliver micro-credentials. The diagram below describes what quality assurance may look like to them each year. The activities are not arranged chronologically.

Diagram 5: Quality assurance for TEOs delivering micro-credentials

#### **Quality Assurance Activities**



#### Working with Standard Setting Bodies

NZQA has worked closely with Workforce Development Councils to start to develop a co-ordinated approach to monitoring compliance and education performance, integrating our respective monitoring activities wherever possible. We expect to continue this approach with Industry Skills Boards (ISBs) once they are established.

NZQA is also responsible for prescribing quality assurance requirements for ISBs. Proposals for this are set out in Part Two of this consultation document.

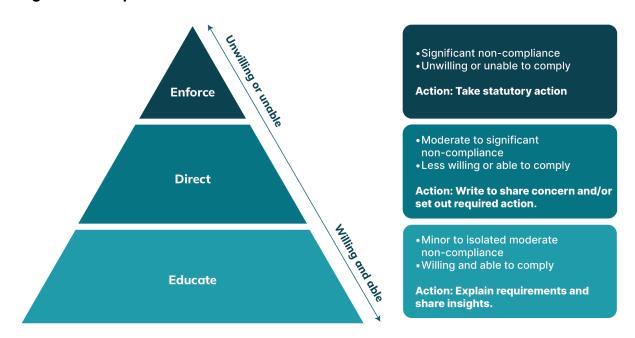
#### Compliance and enforcement

Non-compliance will be managed under the Compliance and Enforcement lever of the iQAF. We will seek to ensure compliance by:

educating and informing TEOs of the requirements that they must meet; and

- directing TEOs to address any non-compliance within specified timelines (this may include directions to cease an activity); or
- undertaking an enforcement activity, for example issuing a compliance notice or imposing conditions.

**Diagram 6: Compliance and enforcement** 



Interventions will be proportionate to the significance of the issue, quality of education or the safety of learners, whether it is repeated or a one-off, and the willingness and ability of the TEO to comply.

By proactively identifying risk signals and channelling our monitoring resources, we expect that most issues will be identified in a timely way and interventions will come mainly under the Educate and Direct tiers.

Where education performance monitoring reveals widespread issues across multiple programmes and/or micro-credentials within the same TEO, or where delivery of programme or micro-credential puts significant number of students at risk, NZQA monitoring will escalate to an organisational level approach – i.e. we will monitor the TEO against the criteria set out in relevant Rules.

There will be no tolerance for dishonest, misleading or fraudulent type behaviour.

#### Communicating TEO non-compliance

We expect all regulated parties to be able to meet the requirements in legislation and rules at any time.

Where there is ongoing non-compliance and poor education performance, we will take statutory action and publish those actions on our website.

This transparent approach ensures the public and other agencies are aware of NZQA concerns about TEO compliance and education performance.

#### **Transition matters**

#### External Evaluation and Review

The External Evaluation and Review (EER) process will be phased out. No new EERs will be scheduled from 1 January 2026. EERs on the 2025 schedule will be completed and a report issued with categories.

We propose to set out in rules a standard text to be used by TEOs who wish to continue to publish their most recent EER categories:

- The year in which NZQA awarded the EER category to be included; and
- A statement to the effect that NZQA no longer uses the EER system.

#### Assuring Consistency

To ensure there is an integrated approach to monitoring graduate outcomes in future, that minimises compliance load, we propose discontinuing NZQA's Assuring Consistency function. It is proposed that no consistency reviews are conducted from 1 January 2026.

The Assuring Consistency function was introduced to provide assurance that different programmes leading to the same New Zealand Certificate or Diploma are producing graduates with comparable knowledge and skills.

More recently, NZQA's work to <u>Simplify New Zealand Qualifications</u> led to the development of skill standards which are now the mandatory building blocks of qualifications and micro-credentials. Programme variability will decrease over time as a result and SSB moderation will apply to a wider range of programmes replacing the need for assuring consistency.

Other quality assurance activities also contribute to monitoring graduate outcomes:

- WDCs (SSBs) have a role in ensuring that programmes will meet industry needs through their programme endorsement function
- NZQA monitors through its Rules that TEOs:
  - have adequate and effective processes for monitoring the quality of outcomes for learners and other stakeholders
  - o monitor and assure the consistency of qualification achievement by students.

Under iQAF, NZQA may also initiate a thematic review to better understand graduate achievement for a specific qualification or suite of qualifications.

#### Degree and post-graduate monitoring arrangements

In 2026 NZQA, in consultation with TEOs, will establish the schedule for programme monitoring of existing degree and post-graduate qualifications.

The schedule will be based on previous monitoring reports, Annual Programme Evaluation Reports, and monitoring, review, or reaccreditation undertaken by other regulatory bodies.



# Questions

- 3. Do you agree with the proposed approach to monitoring degrees, graduate certificates and diplomas, and postgraduate qualifications? If not, what would you change?
- 4. Do you agree with the proposed approach to monitoring programmes leading to sub-degree qualifications at Levels 1-7? If not, what would you change?
- 5. Do you agree with the proposed approach to monitoring micro-credentials? If not, what would you change?
- 6. Do you think the combination of *compliance monitoring* and *education* performance monitoring will provide sufficient assurance of an organisation's overall capability to deliver high-quality education? If not, what would you change?

#### System assurance



NZQA will collaborate with relevant government agencies, standard setting bodies and providers to understand our impact, identify risks and improve system performance by:

- monitoring the credentials listed on the NZQCF and the DASS
- conducting risk scans and thematic reviews
- sharing insights.

We will share data and information with agencies and SSBs and work with them and other stakeholders to identify trends, changes, and potential risks in the sector.

#### Monitor the credentials listed on the NZQCF and the DASS

We will work with SSBs and TEOs to ensure the relevance and credibility of the NZQCF, by regularly evaluating the performance of qualifications, microcredentials and standards and identifying areas for improvement (e.g. usage, duplications, graduate outcomes, learner/industry and other stakeholder feedback).

#### **Conduct system risk scans**

NZQA will examine external factors that could impact the education sector, such as policy changes, technological trends, industry demands/workforce requirements, downturns in the economy, societal shifts or long-term demographic changes that could impact educational planning, or emerging areas where additional support or regulation is needed.

This activity will help NZQA, other agencies, and TEOs anticipate emerging challenges and opportunities. As scans are completed, we will publish the most important systemic risks to tertiary education quality, including any data and the sources relied on.

This approach is informed by the Australian Skills Quality Authority scan and risk process which can be viewed here.

#### **Conduct thematic reviews**

NZQA will conduct or commission in-depth examinations of specific aspects of the education and training system to identify trends, best practices, and areas for improvement.

We will draw on data, such as monitoring and moderation results, compliance rates among providers, TEO self-reviews and quality improvement plans, to identify specific themes or trends across TEOs or qualifications. We will also track and evaluate key indicators to ensure that the system is delivering the desired results, and we will apply interventions for continuous improvement.

Thematic reviews will be undertaken as the need is identified from the system risk scan and other intelligence. For example, NZQA recently consulted on changes to the NZQCF, in which a variety of views were expressed about approaches to granting credit via credit recognition and transfer (CRT), or recognition of prior learning (RPL). Further examination of how CRT and RPL are currently being used by providers, and in work-based learning settings, could be the focus of a thematic review.

Thematic reviews can also be used to drive equity, by gathering and sharing information on TEO approaches to support equitable outcomes for Māori, Pacific and disabled learners, and learners from socio-economically disadvantaged backgrounds.

The results of thematic reviews will enable us to publish insights on good practice, inform the development of further resources, and update rules and expectations. The findings may also inform our other quality assurance activities.

#### **Share insights**

NZQA will disseminate findings or knowledge derived from data analysis and quality assurance activities to stakeholders, for example monitoring summary reports.

We will work with agencies, SSBs and other stakeholders and share with the public any issues, key trends, or best practices, via Insights papers.

As an example, mātauranga Māori, te ao Māori, and te reo Māori can be included in qualifications and micro-credentials listed on the NZQCF where this is relevant. NZQA recently published an insights paper to share one TEO's journey to weave mātauranga Māori into its programmes of learning.

#### Reviewing the framework

At the centre of iQAF is its purpose: *Robust, credible and relevant qualifications and credentials that prepare graduates to meet employer, iwi/hapū/whānau, and community needs.* In addition to the measurement of specific aspects of the framework through NZQA's <u>Statement of Performance Expectations</u>, we will periodically review iQAF as a whole, to ensure it is delivering on its purpose.

The NZQA Board recently approved NZQA's overarching Regulatory Framework. It is based on three regulatory principles – *Impact-led*, *anticipatory*, and *adaptable*. These principles will guide future reviews of iQAF to ensure we apply right size, right time regulation that balances the rules with learner and TEO needs.

#### iQAF enablers

The enablers build on the four cornerstones. A risk-informed approach, data and insights, and respectful and collaborative relationships are woven through the quality assurance levers set out above and support the integration of iQAF quality assurance activities.

We describe the role of each enabler in more detail here.

#### Risk-informed approach

The iQAF risk-informed approach sets out how NZQA uses a desk-based risk-assessment to proactively identify and manage risks and non-compliance in a systematic way, at both the system and TEO levels.

It is important to note that a risk is not an issue. It is something that has not yet happened but may lead to harm or a reduction in quality. It may be emerging with limited or no evidence, or there may be substantive evidence of its potential impact.

Risks in the context of the iQAF refer to TEO activities or wider system changes that may pose a threat to the quality of education or the safety of learners.

At a **system level**, data and research will be used to identify trends and risks early on so they can be effectively managed by both NZQA and TEOs. Findings will be communicated through system risk scans aimed at preparing TEOs and lifting the overall performance of the sector. TEO management of any identified systemic risks will be monitored.

At an **individual TEO level**, a risk assessment will be performed to prioritise our monitoring activities. This will be based on a range of data and information including the TEO's quality assurance history, scope of delivery and context. The risk assessment is not intended to be a performance register or indicator of quality.

By proactively identifying risk and applying our monitoring resources in a risk-informed way, it is expected that most issues will be identified in a timely way.

We also hear directly from learners, industry, and other stakeholders when they have concerns about education quality. We are working on how we can gather these voices and experiences more proactively, as part of the overall risk-informed approach.

#### Data and insights

NZQA will routinely exchange information and data, as appropriate, with SSBs and other agencies to build a comprehensive, collective view of TEO and sector performance, inform strategic planning, identify risks, and support collaborative efforts within the educational sector.

A broader understanding of TEO and sector performance, and the education landscape will enable stakeholders to make informed decisions, coordinate effectively, and apply a consistent approach to maintaining system improvement. By reducing the need to supply data multiple times, it will also reduce TEO compliance costs.

Amongst other sources, information used by NZQA will be drawn from:

- the data and reporting requirements that already apply to TEOs, e.g. data submitted through the Industry Training Register and the Single Data Return required of TEOs funded by the Tertiary Education Commission<sup>1</sup>, credit reporting data
- TEO specific information sources, financial returns, moderation and data from other monitoring activities including information from other agencies
- reporting required to maintain registration as a PTE
- data from TEOs that provide evidence of compliance with the Code.

NZQA will share with TEOs a summary view of their compliance and education performance history.

A TEOs' summary information may be shared with agencies and SSBs where appropriate.

Clear protocols for data and information collection, storage, usage, and sharing, will be developed following the policies and guidance from the Office of the Privacy Commissioner and the Government's guidance on Digital Government.

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<sup>&</sup>lt;sup>1</sup> The TEC's DXP Ngā Kete project will be the source of future data.

#### Respectful and collaborative relationships

Respectful and collaborative relationships between NZQA, TEOs, learners, employers, communities and others in the education system ensure that everyone understands each other's responsibilities, operating environment, and goals.

Through its work every day, NZQA aims to demonstrate its values of:

- Respect We value and consider the professional views, culture and beliefs, feelings, needs and efforts of others. We give equal consideration to others.
   We say what we mean, listen respectfully and think and act constructively.
- Rangatiratanga empowering and leading others.
- Kotahitanga collaboration and unity.
- **Ngaiotanga** doing our job in the best possible way.
- Kaitiakitanga guardianship.
- Whakapono open and transparent.
- Manaakitanga caring for and valuing others.

We will demonstrate our values through our interactions with TEOs, the approach we take to our work and the quality of what we produce.

For NZQA and TEOs, relationships are built on regular contact, including through the annual self-review process. The frequency and nature of communication between NZQA and a TEO will depend on the TEO's scale and capability, as well as the scope of qualifications and credentials it provides or develops.

Through these relationships, NZQA will support TEOs to understand and achieve compliance and NZQA will understand each TEO's context, education delivery, and quality assurance approach.

NZQA will use its customer relationship management system to build a consolidated view of TEOs. This will be accessible to all NZQA teams, enabling a coordinated approach and consistent service.

# Part Two: Proposed rules changes

#### Rule changes to support iQAF

The Directory of Assessment and Skill Standards and the Qualification and Microcredential Listing and Operational Rules

**Review period**: In these rule sets it is proposed to replace references to reviews of qualifications, micro-credentials and standards being undertaken within 5 years, with a requirement that reviews be undertaken within a period acceptable to NZQA. This is intended to acknowledge that review periods can reasonably be longer than 5 years and that Standard Setting Bodies are well placed to advise on an appropriate review period.

**Currency:** It is important that the NZQCF and the DASS are not cluttered with items that are not used.

Having enabled a more flexible approach to setting review periods it is also proposed to strengthen provisions that enable NZQA, after consulting the developer, to expire qualifications, micro-credentials and standards that are not being used or kept up to date.



#### Question

7. Do you have any comments or suggestions for the proposed changes to review periods for qualifications, micro-credentials and standards?

#### Programme Approval, Recognition, and Accreditation Rules

Qualifications are required to include appropriate skills standards where these exist. We expect over time, as more skill standards are developed, qualifications will made up entirely of skill standards. For these qualifications, programmes will not need to be so detailed because some of the relevant information is set out in the standards. In the Programme Approval, Recognition, and Accreditation Rules it is proposed to:

- reduce the programme approval process for qualifications that comprise skill standards. These requirements will be that:
  - Criterion 1 applies as per the current rules
  - Criterion 3 applies as per the current rules
  - Criterion 5 applies except that:
    - programme length and structure can be indicative
    - the integration of practical and work-based components is not required.
    - normal progression within the programme, and completion does not need to be shown.
  - Criterion 6 applies as per the current rules
  - Criterion 2, 4, 7, and 8 are not required to be met. However, for maintaining programme approval, the approval holder will need to ensure reviews do occur for criterion 7.

We also propose clarifying in these Rules that where criterion 4 (Collaboration, acceptability and consultation) applies, and an Industry Skills Board has endorsed the programme, information for that criterion need not be provided by the applicant institution and NZQA will not consider this criterion in assessing the application.



#### Question

8. Do you have any comments or suggestions for the proposed Rules changes to support streamlining approval processes?

# Programme Approval, Recognition, and Accreditation Rules and the Microcredential Approval and Accreditation Rules 2025

In both sets of rules, it is proposed to align any references to the nature and frequency of monitoring with the recommendations set out in this consultation document.

# For degrees, graduate certificates and diplomas, and postgraduate qualifications

The overall frequency of NZQA monitoring will be less in the future. It is proposed that the rules require:

- At the end of the **first year** of delivery following programme approval the system will remain the same:
  - o the TEO prepares a programme evaluation report
  - NZQA staff and an appointed external monitor will undertake a site visit
  - NZQA prepares a monitoring report.
- NZQA monitoring will then next occur when the 1<sup>st</sup> cohort graduates (where this differs from the 1<sup>st</sup> year).
- NZQA will thereafter schedule programme monitoring every three years.

# For micro-credentials or programmes leading to qualifications at Level 1-6 and level 7 Diplomas

• the frequency and depth of sub-degree monitoring will be informed by a risk assessment. This monitoring will focus on one or more of the programme approval and accreditation criteria, or micro-credential approval and accreditation criteria, as set out in the rules.



#### Question

9. Do you have any comments or suggestions for the proposed Rule changes to specify the nature and frequency of monitoring activities?

#### **Quality Assurance Rules**

This rule is the current vehicle for requirements related to the **External Evaluation** and **Review** process. These requirements will be removed.

It is proposed that TEOs be required to use a standard set of wording, in any publicity material, when referring to EER categories to make it clear to potential learners that the EER system no longer applies and that categories are timebound. The proposed wording would require:

- the year in which NZQA awarded the EER category to be included; and
- a statement to the effect that NZQA no longer uses the EER system.

It is also proposed to consolidate in this Rule the **administrative and compliance matters** currently included in other rule sets. These include the various requirements for implementing and maintaining organisational systems and processes required to deliver education and support learners; compliance requirements; self-reviews; participation in monitoring; the maintenance, retention and provision of information to NZQA and others.

As an example, the Rule would include the requirements for **self-review** including requirements on TEOs to:

- regularly review the quality of the education delivered, the effectiveness of its internal quality assurance systems and practice, and the outcomes learners achieve
- provide a report to NZQA annually that:
  - complies with a set format, such as responding to the thematic review question
  - provides evidence of the effectiveness of the TEOs self-review processes
  - demonstrate how well the TEOs understands its performance and the contributing factors
  - o identifies areas for improvement and its plan to address these
  - attests to its compliance with regulatory requirements including the Code; and
  - periodically describes its practice on specific themes or areas nominated by NZQA.
- engage in a conversation with NZQA (following submission of the report);
   and

 address any matters identified in the TEO's quality improvement plan within an agreed timeframe.

The Quality Assurance Rules will apply to all TEOs (excluding universities).



### Question

10. Do you have any comments or suggestions in relation to the purpose or scope of the Quality Assurance Rules?

#### **Private Training Establishment Registration Rules**

There will be consequential changes made to the Private Training Establishment Registration Rules including but not limited to:

- removal of requirements and references to EER and inserting any reference to self-review as required.
- a provision that sets as a default that PTEs should provide annual financial returns every two years, unless NZQA has required these annually.



11. Do you have any comments or suggestions in relation to consequential changes to the Private Training Establishment Registration Rules?

#### Other proposed Rules changes

#### Industry Skills Boards – proposed quality assurance

The Education and Training (Vocational Education and Training System)
Amendment Bill includes a provision that would enable NZQA to make rules
"prescribing quality assurance requirements for industry skills boards, including
(without limitation) requirements relating to the performance of the relevant
functions of industry skills boards". It also proposes a set of functions for ISBs

Of these we propose that quality assurance rules are made (section 452(1)((i) of the Act) to require an ISB to:

- participate in NZQA monitoring; and
- annually, systematically and authentically review the effectiveness of the arrangements it has in place to:
  - undertake strategic workforce analysis and planning for the specified industries
  - o develop, set, and maintain skill standards
  - develop and maintain industry qualifications and micro-credentials for listing on the Qualifications and Credentials Framework and to maintain qualifications and micro-credentials for which it has become the developer
  - develop and maintain national curricula for qualifications for which it is responsible as a standard-setting body under section 438
  - develop, set, and maintain capstone assessments based on the needs of the specified industries
  - o decide whether to endorse programmes developed by providers
  - carry out moderation activities in relation to any standards and capstone assessments it sets.

Having conducted an annual self-review, the ISB should comply with the arrangements set out in the Self-Review section of this document including:

- providing a report to NZQA annually including completing a template providing National External Moderation data
- engaging in a conversation with NZQA (following submission of the report);
   and

 addressing any matters identified in the TEO's improvement plan within an agreed timeframe.

#### Quality assurance of work-based training

Section 452(1)(p) of the Act enables rules to be made 'prescribing requirements relating to work-based training'. The Education and Training (Vocational Education and Training System) Amendment Bill (VET Bill) envisages work-based programmes developed by polytechnics, private training establishments, and wānanga.

It is proposed to make work-based training rules that require TEOs (including for ISBs during the transition period) to:

- participate in NZQA monitoring
- ensure the TEO has the capability and capacity to ensure assessment materials and decisions are fair, valid, consistent and appropriate for the level, given the stated learning outcomes
- participate in and meet external moderation requirements
- to have programmes approved and accredited including any required consents to assess.
- to meet the self-review requirements including as part of its annual selfreview to systematically and authentically review the effectiveness of the arrangements it has in place to ensure the quality of the training and assessment undertaken in workplaces, including the effectiveness of:
  - services designed to support, employers, trainees, assessors, and verifiers, to undertake training and assessment of trainees
  - resources, provided to employers, trainees, assessors, and verifiers, to support their training and assessment of trainees
  - verification and moderation of assessment activities.

#### Student Funds Trust Deposit Exemption Rules 2022

Under these rules Private Training Establishments are exempt from having to have a trust arrangement for student fees of \$500 or less (GST inc).

#### Issue

Inflation since this rule was introduced suggests an increase in value should be made to maintain the intent of the policy.

\$500 in 2005 adjusted for inflation would equate to ~ \$850.

#### Proposed change

It is proposed to increase the exemption to \$1000 (GST inclusive).

#### Updating all rule sets as appropriate

We will also update terminology (such as referring to ISBs or SSBs rather than WDCs) and remove references to EER and consistency reviews across all rule sets as required.



# **Q**uestions

- 12. Do you have any suggestions for matters NZQA needs to consider in Rules for ISBs?
- 13. Do you have any suggestions for matters NZQA needs to consider in Rules for work-based training?
- 14. Do you agree with the proposal to increase the student fees exemption to \$1000 (GST inc)? If not, please provide your reasons.

#### **Future Rules work programme**

The proposed Rules changes above are the minimum required to support the implementation of iQAF and the Vocational Education and Training reforms.

We are also considering how we can further simplify our Rules to reduce duplication and streamline processes.

For example, one approach could be to develop Accreditation Rules that would set out:

- a single process for applying for accreditation to provide an approved programme, a recognised New Zealand programme, part of a programme, or a micro-credential, noting that consent to assess is already granted as part of the accreditation where required
- the requirements to be met to maintain accreditation, or make changes to the accreditation, which could be the same across each product (programme, New Zealand programme or micro-credential).

The rules for sub-contracting and the English language requirements (for programmes only) could also be moved into this rule set.

There is also an opportunity to consolidate several Rules which only apply to PTEs.

We are keen to hear If you have any suggestions for the next round of Rules changes following iQAF implementation. Please email us at <a href="mailto:Rules@nzqa.govt.nz">Rules@nzqa.govt.nz</a>.

#### After the consultation

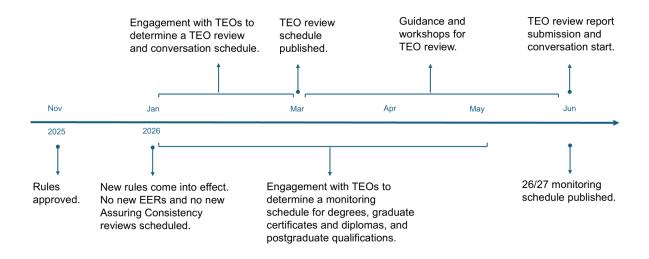
We will consider your feedback on the proposed iQAF levers and activities and recommended rule changes. We will then fine-tune the activities and prepare new or amended rules for NZQA's Board and the Minister of Education's approval.

New or amended Rules to support iQAF implementation will be introduced in January 2026.

In the second half of this year, the focus will be on developing NZQA processes, TEO guidance, and transition planning.

Transition to iQAF will be complex and requires careful planning for all involved. A phased approach to transition will be taken. The schedule below is the draft first phase for iQAF implementation. We will continue to work closely with TEOs, agencies, SSBs and other key stakeholders on iQAF implementation.

**Diagram 7: Draft implementation schedule** 



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# **Appendices**

#### **Appendix 1: List of consultation questions**

#### Part One - iQAF levers and activities

- Question 1. Do you agree with the proposals to simplify approval and accreditation processes? If not, what would you change?
- Question 2. Do you agree with the proposed self-review process? If not, what would you change?
- Question 3. Do you agree with the proposed approach to monitoring degrees, graduate certificates and diplomas, and postgraduate qualifications? If not, what would you change?
- Question 4. Do you agree with the proposed approach to monitoring programmes leading to sub-degree qualifications at Levels 1-7? If not, what would you change?
- Question 5. Do you agree with the proposed approach to monitoring microcredentials? If not, what would you change?
- Question 6. Do you think the combination of *compliance monitoring* and *education performance monitoring* will provide sufficient assurance of an organisation's overall capability to deliver high-quality education? If not, what would you change?

#### Part Two – Proposed rules changes

- Question 7. Do you have any comments or suggestions for the proposed changes to review periods for qualifications, micro-credentials and standards?
- Question 8. Do you have any comments or suggestions for the proposed Rules changes to support streamlining approval processes?
- Question 9. Do you have any comments or suggestions for the proposed Rule changes to specify the nature and frequency of monitoring activities?

- Question 10. Do you have any comments or suggestions in relation to the purpose or scope of the Quality Assurance Rules?
- Question 11. Do you have any comments or suggestions in relation to consequential changes to the Private Training Establishment Registration Rules?
- Question 12. Do you have any suggestions for matters NZQA needs to consider in Rules for ISBs?
- Question 13. Do you have any suggestions for matters NZQA needs to consider in Rules for work-based training?
- Question 14. Do you agree with the proposal to increase the student fees exemption to \$1000 (GST inc)? If not, please provide your reasons.

Appendix 2: Draft TEO review report template

TEO SELF-REVIEW SUMMARY REPORT				
Section One:	<b>TEO information (</b> <i>Please add information in the sections below)</i>			
Name of TEO				
MOE number				
Contact person				
Distinctive characteristics				
Total EFTS				
List the key initiatives your organisation undertook in the previous year to improve:  • teaching and learning  • assessment  • learner wellbeing and safety highlighting your successes and challenges relating to these.				
Section Two	Thematic review question e.g. Please provide a 1–2-page summary of your organisation's practice and performance on Recognition of prior learning (RPL). A link to Information on RPL on the NZQA website is here			
Section Three	Quality Improvement Plan Drawing from your organisation's annual Quality Improvement Plan please identify the most important			

	priorities you will address in 2026. Please provide a link or attach your organisation's improvement plan for 2026.				
Opportunity or problem	Actions	By when	Expected impact		
Add rows as needed (max 8 lines)					
Section Four	Confirmation				
	Please confirm the organisation is compliant with the following:				
	☐ a list of NZQA Rules as relevant to the TEO context will be provided e.g., Programme Approval, Recognition, and Accreditation Rules				
	and				
	☐ Education (Pastoral Care of Tertiary and International Learners) Code of Practice				
	☐ All programmes and micro-credentials meet the notional learning hours required to achieve the specified credit value.				
Signed on behalf of TEO					
Name:					
Position:					
Date:					