

## TEO self-review

Would the annual self-review be requested for monitoring purposes, as the Code self-reviews are?

The purpose of the self-review is to ensure that TEOs are actively assuring the quality of their teaching and assessment. It is not intended for monitoring purposes.

How will NZQA know that the self-review is authentic? How will NZQA know that providers have not used artificial intelligence (AI), and what will stop them?

We are asking for advice on whether the sector sees self-review as being a useful addition to the system and working to understand what this will be like in practice. One of the challenges is that anything can just become a compliance exercise. We are hoping the annual conversation will offer an opportunity for NZQA and TEOs to have a genuine discussion about the self-review. More broadly, NZQA is considering how the use of AI could impact on the quality assurance framework.

Will this replace the current annual pastoral care code attestation requirement?

Yes, the current thinking is that there will be one attestation process that will cover the Code and any other compliance requirements.

I can't see any reference to tertiary education indicators (TEIs) or key evaluation questions (KEQs). Is the intent to retain these as part of the self-assessment?

We are proposing changes but also looking at how some of the underpinning considerations like TEIs and KEQs will influence the next stage of work.

Does this new approach mean that we are doing an annual self-review of the entire organisation relative to NZQA requirements, as well as each programme being reviewed?

Not necessarily. An annual review and programme monitoring have different aims. We will look at whether there's duplication of functions and remove these where possible. This is an area that we welcome feedback on.

If the annual review includes specific areas of interest to NZQA, when will providers know what these areas are? To reduce compliance, it would be helpful to know this in advance.

NZQA has indicated that there might be a theme built into an annual review, where we may ask a specific question or for something to be addressed. If we were going to build themes into an expectation for an annual review it would be introduced well in advance.

Do you have an idea of what the feedback time from NZQA might be after receiving an annual attestation from a TEO?

No, we cannot give a specific timeframe at the moment between TEO submission and the conversation with NZQA. It is clear that it will have to be a relatively quick response to be useful.

Beyond the annual 6-7-page self-assessment, to what extent does the new iQAF system encourage authentic TEO self-assessment on an ongoing basis?

A fundamental assumption of iQAF is TEO ownership of quality and quality improvement. We will be developing the details of this in the next stage of work and welcome any suggestions.

Can you please provide some clarity on the expected timing of the self-review, in relation to the academic year and other NZQA and TEC commitments?

The next stage of work will consider conflicts with other requirements, resourcing, commitments with other agencies, and how the self-review might best fit with other commitments TEOs have to other regulatory authorities that also have reporting requirements etc.

Assuming there are approximately 400 TEOs in NZ, is it realistic that NZQA will be having about two discussions per day, every working day of the year?

Yes, that is what is currently being proposed and we are aware that the conversations are not likely to be evenly spread throughout the year. The annual conversation to discuss TEO self-review will not be the only interaction we expect TEOs to have with NZQA. We will work through the details in the next stage of work.

How specific will the guidelines in the [self-review] template be?

We will be testing a template in the new year. We are thinking it will be short, clear and simple.

Is this process intended to be an 'add-on' to all that we engage in now? Or will it be an integrated system-wide process and will it integrate current activity such as the Code of Practice (COP), NZQA moderation, consistency reviews, attestation statements etc?  
Will this report be evaluated by external evaluators, or will it be reviewed by NZQA staff?

The intention is to reduce compliance by incorporating as much of the TEO's self-review activities as possible into one streamlined process. NZQA monitoring processes are separate from the TEO's self-review, but we also intend to take a more integrated approach to our monitoring activities whenever possible.

## External Evaluation Review (EER) and categories

Will this project affect EERs possibly to be held in 2025 and 2026?

All the current compliance requirements for quality assurance will continue until further notice. There will be no changes until we have finalised any changes to the existing framework and the associated NZQA rules.

How will you differentiate good from bad, and ensure it is transparent? How would international and domestic students know that they are enrolling with a high-quality institution?

In the new framework, we have proposed moving away from the current EER Statements of Confidence for self-assessment and educational performance and resulting TEO categories. For the majority of providers, if you're in the system it means that you are a quality provider. We intend to establish a process that gives an indication of whether an organisation is in the system and whether there's any compliance requirements or conditions on that organisation. The next phase of work will provide operational detail for TEO performance indicators.

If there is no EER process, how is NZQA going to look at 'what is high performing?' Will there be definitions of that, or certain thresholds? What sort of advantages would that bring?

We hope to be able to minimise compliance costs further for 'high performers'. How we recognise a 'high performer', the aspect of performance this relates to (e.g., programme development) and the consequences of this recognition will be considered in the next stage of work.

The EER is one size fits all. But in this approach, NZQA are talking about different providers of different sizes and different offerings (which is a good thing) but how do we maintain transparency? Considering other levers like monitoring and if there are no ratings, how is NZQA going to balance that?

We will publish the approach and process that inform our view of TEO performance. We're aiming to be more reliant on monitoring the sector by bringing together a wide range of data sources that are currently available, which doesn't easily produce a grading response. We are currently proposing to move away from categories to a simple 'this organisation is in the system' or 'this organisation is in the system and there's a published compliance notice.'

What will replace category status to determine international student work rights?

Immigration NZ and the TEC have tied the categories to their processes. We are engaging with both parties on this and it is something that we will have more certainty on as that engagement progresses.

## **Programme monitoring**

Will in-depth individual programme reviews continue as part of this change?

Yes. We will aim to integrate monitoring activities for an individual TEO as much as possible, but we envisage there will be some in-depth reviews, depending on the delivery profile and performance of the TEO.

Will NZQA have a clear monitoring schedule that will be shared with providers so they can prepare in advance?

Yes, it is reasonable to expect NZQA to provide enough notice that you are able to factor any request into your regular work activities.

How will NZQA make programme monitoring more meaningful and not shallow?

A key driver of the iQAF review is to ensure that all parts of our quality assurance framework are meaningful.

Will monitoring and compliance activities be integrated in this new framework?

Yes. We are developing the detail of these in the next phase of work.

Can you give us an idea of how intensive sub-degree monitoring might become?

We believe that we can better coordinate with other SSBs and utilise data more effectively. We are hoping it will be less burdensome than it is currently.

Will APERs and degree monitoring (including self-monitoring) still be required?

Yes. The exact details and opportunities to streamline will be determined in the next phase of work.

Will any changes be made to improve programme monitoring?

We intend to improve all aspects of the quality assurance framework. One of the things we are hoping to do is take full advantage of the data and systems across agencies so we can use these individual insights and have a better shared view of performance.

## Data sources and collection

Is NZQA's expectation that TEOs provide data (proactively or reactively) or that NZQA somehow sources this independently? Does this also mean that TEOs will need to have consistent approaches to the collection of data?

NZQA wants to minimise compliance or remove any duplication in data reporting requirements. We want to utilise what already exists. One of the key tasks in the next step of implementation is to closely look at what kind of information already exists, and how well we can collate that information into a single reliable view of a provider's performance.

How will data be gained on non-TEC funded, non-qualification delivering TEOs? How will NZQA gain data/ inform themselves about these providers who have little to no data being submitted to an entity such as TEC or MoE?

MoE currently collects data from TEOs through the export education levy, which provides a view of the non-TEC funded providers. These providers are less data-rich, and we are considering whether that constitutes a data gap that we will need to fill, or whether we can implement a system without having that particular insight.

Has NZQA considered using TEC educational performance indicators (EPIs) as part of their measure, and other measures such as financial sustainability levels etc?

Yes.

What data will be used to identify risk and where will this data come from?

One of the framework enablers is a 'risk-informed approach' and that is an area that we are currently progressing work on. We will define what we mean by risk and determine what kind of data we are going to use to identify those risks.

## QA of providers

What processes will be in place to quality assure assessments and assessment practices, including providers not using unit standards and not subjecting to national external moderation?

We're currently proposing that we will be monitoring where programmes have got unit standards or skill standards (either SSBs or NZQA will be conducting external moderation). Where programmes do not have any standards, NZQA will conduct programme monitoring.

Will the tertiary education indicators change, if so how much?

Yes, it is highly likely that the tertiary education indicators will change and we will have more clarity on these in the next phase of work.

There seems to be a strong focus on risk identification rather than a category rating. What are the implications to a TEO when risk identifiers indicate that a TEO is high-risk?

We are proposing to use integrated data to ascertain red flags and look further into any issues that may arise. We are currently developing a risk-informed approach, which will show how we will use risk to inform the way we quality assure providers. Once we have developed that we will be making it available to all providers to see. It will be a transparent process, and we will be transparent about indicators of risk.

Will PTEs and tertiary education institutions be treated the same? E.g. will they have the same expectations? The proposal for TEC regarding proposed changes to the Significant Plan Amendments and Replacement Plans (SPA's and RP's) suggest expectations will be quite different.

Generally, yes, we are proposing a framework that applies to all the different sized organisations that would work for all. We will be analysing how some of the levers on the framework can be adapted for size, capability and complexity in the next stage of work.

## Duplications

How will NZQA mitigate duplication of administrative reporting, for example the WDC/ SSB provider portfolio and annual reporting?

This is a high priority for us while we continue developing processes under the iQAF. We are committed to working with other agencies to ensure that we only ask for information once and that the information meets the needs of all organisations.

Has NZQA communicated and collaborated with the NZ Teaching Council as part of these changes? There are many reporting requirements across NZQA and NZ Teaching Council that overlap and are repetitive.

We are not currently engaging in specific discussions with the NZ Teaching Council. We are interested in gauging how organisations like the NZ Teaching Council could provide insights to NZQA. We also want to understand their processes for the approval and accreditation of qualifications. We are looking at different organisational processes to ensure that compliance costs are minimised through inter-agency collaboration.

How will NZQA ensure that it isn't asking for the same data over different evaluative events e.g. consistency, annual reports etc?

We are currently reflecting on the data available across the tertiary sector and how best to use it.

In relation to double ups with consistency reviews, the consultation document says that consistency reviews will be phased out as skill standards are used more. Is this true?

This is what we have indicated in the example part of the consultation document. This will be the case as skill standards are adopted or have been developed to replace unit standards. They will be phased out gradually and we will develop a transition plan for such activities in the future.

## **Cost**

Would this [new framework] be more cost effective for providers?

This is what we are working towards. We want to work with the sector to create a supporting fees structure. We think our fees structure is too complex and that it lends itself to uncertainty about what fees will be imposed on an individual provider in any given year. We are working to give providers more certainty over fees and are looking to bring forward a fees proposal for feedback in 2025. By removing some of the compliance burden we are looking to make it more cost effective.

## **Working with other regulatory bodies**

How will the system assurance component [of the draft iQAF] work alongside regulatory authorities?

We are keen to capture insights from different regulatory authorities and organisations such as WDCs and SSBs to bring together a single view of sector performance and of individual providers.

How will NZQA work with the Committee on University Academic Programmes (CUAP) to align processes in Level 7+? There are two very different systems currently, particularly with regards to quality assurance.

We are already working with CUAP for the approval of Doctoral degrees. NZQA will explore the possibility of aligning processes with CUAP in our next phase of work where we will be getting into the detail of activities that sit under the framework.

## **Educate and Inform**

What does Educate and Inform mean in the diagram?

It means that we provide sufficient information in a form that best enables those using our systems to understand what they need to do and, where it is appropriate, how to do it.

## **Thematic review**

Would the thematic reviews replace the consistency reviews of qualifications?

No. Thematic reviews serve a different purpose. They seek to understand how well the sector as a whole is functioning. A thematic review might for example look at how well a particular category of learners are doing in the system.

## **Others**

Are there some considerations of timeline, and potential evolution of new bodies within the VET reforms underway currently that may impact on this redesign work?

Yes, there are. We will need to incorporate any new TEOs that come out of the implementation of the VET reforms.

Will there be any public reporting on the outcomes of the process?

Yes. We will provide a summary of the feedback received and any final decisions of changes to the framework. The summary will be published on the website. We will notify stakeholders that have previously been engaged in the iQAF work.