



Draft integrated quality assurance framework (iQAF) consultation- Summary of submissions March 2025

NZQA

Mana Tohu Mātauranga o Aotearoa
New Zealand Qualifications Authority



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EXECUTIVE SUMMARY

In October 2024, the New Zealand Qualifications Authority (NZQA) released a consultation document, [*Consultation on the draft integrated quality assurance framework*](#). Through public consultation, feedback was sought on the high-level design for the integrated quality assurance framework (iQAF), including its quality assurance cornerstones, enablers and levers. This report summarises the views submitted during consultation, which ran from 29 October to 10 December 2024.

NZQA received 62 submissions from groups and individuals involved in the tertiary education sector.

Overall, the consultation feedback highlights support for the proposed iQAF.

Submissions expressed general support for proposed changes, agreeing with the four quality assurance cornerstones and key components. There is strong support for a shift to more targeted, risk-informed monitoring and compliance management.

Concerns expressed included how to acknowledge high quality, and what should be included in a TEO self-review.

Many submitters also commented on the need for NZQA to consider learner and stakeholder voices, evaluate iQAF, improve internal processes, and ensure transparency.

The extensive feedback NZQA received through this consultation has provided valuable insights and will be considered as we further develop the iQAF components in the first half of 2025.

PURPOSE OF THIS DOCUMENT

This report summarises the key themes from the submissions received on the *Consultation on the draft integrated quality assurance framework* which ran from 29 October to 10 December 2024.

The consultation document detailed the draft iQAF, including its key components and the high-level descriptions of the proposed quality assurance activities. It sets out how these might work for tertiary education organisations in future.

This document draws on the feedback received but does not reflect every response made by each submitter. NZQA will consider all the feedback received when developing the next level of detail required to implement iQAF.

INTRODUCTION

NZQA is one of the government agencies that manage and regulate education in New Zealand. We are responsible for making sure that tertiary education (outside of universities) is high quality, and that New Zealand qualifications and credentials are accepted as credible and robust, both nationally and internationally.

The evaluative quality assurance framework (EQAF) has been in place since 2009. In 2021, we reviewed EQAF to ensure our quality assurance arrangements continue to function as intended. The review and subsequent research and engagement with stakeholders led to the proposed iQAF.

The iQAF is designed to provide confidence that learners are achieving robust, credible and relevant qualifications and credentials that prepare them to meet employer, industry, professional association, iwi/hapū/whānau, and community needs in New Zealand and internationally.

It has three components that support the purpose of the framework: quality assurance cornerstones, enablers, and regulatory levers.

Details of the iQAF components can be found in the consultation document [here](#).

We shared the draft framework to seek feedback on the proposed components and changes to how we quality assure tertiary education organisations, before further developing the details of the iQAF components.

PUBLIC CONSULTATION PROCESS

In October 2024, the New Zealand Qualifications Authority (NZQA) published the consultation document [*Consultation on the draft integrated quality assurance framework*](#) and invited submissions from stakeholders and the public.

The consultation document contained 11 questions that focused on the iQAF components and quality assurance cornerstones.

People were invited to submit their views on the proposed framework by email or via an online questionnaire.

During the six-week public consultation period from 29 October to 10 December 2024, we held four public online information sessions and three targeted information sessions with agencies, wānanga and Māori PTEs.

Overall, 187 people participated in the public online information sessions. Figure 1 outlines the number of attendees for each public online information session.

Figure 1: Number of attendees for each public online information session

Session number	Attendees
Session 1	58
Session 2	41
Session 3	40
Session 4	48
Total	187

WHO WE HEARD FROM

We received a total of 62 submissions. These submissions came from individuals, TEOs, peak bodies, standard setting bodies (SSBs), and industry bodies. Submitters who chose to be anonymous were categorised under ‘Other’. Figure 2 outlines the number of submissions received by type of submitter.

Figure 2: Demographics of submissions received

Organisation	Number of submissions
Internal	1
Private Training Establishment	25
Regulator or Peak body	7
Standard-Setting Body	5
Te Pukenga business division	15
Other	8
Wānanga	1
Total	62

Submissions were predominantly received from groups and individuals with existing involvement in non-university tertiary education and the education sector.

HOW WE ANALYSED THE SUBMISSIONS

The project team reviewed all submissions received through the online questionnaire platform and consultation inbox. We used the questions posed in the consultation document to structure the analysis and collate themes.

We read through and categorised all submission answers under each question. We then used Microsoft CoPilot to group and summarise the feedback under each category.

We reviewed the accuracy of the summarised feedback under each category. For the purpose of this report, we further synthesised the feedback into succinct overarching themes that reflect submitters' responses.

SUMMARY OF SUBMISSIONS

Submissions are summarised below by each consultation question.

QUESTION 1: DO THE FOUR CORNERSTONES DESCRIBE THE IMPORTANT ELEMENTS OF QUALITY ASSURANCE? WHAT WOULD YOU CHANGE OR ADD?

Submitters generally agreed that the four cornerstones—Quality Foundation, TEO Self-review, Effective Verification, and System Performance—describe the important elements of quality assurance. People emphasised the need for clear definitions, support for TEOs, alignment with industry and regulatory bodies, a balanced approach between quantitative and qualitative data, and value-add activities.

For *Strong quality assurance foundation*, some submitters referred to the need for clear criteria and quality expectations across all quality assurance facets. Other feedback called for a comprehensive programme of professional development to build TEO capability and feedback loops to assist TEOs with continuous improvement.

Submitters acknowledged the value of *TEOs owning their own quality and quality improvement*. Resources to support TEOs to transition to this process were requested, and some people expressed concern that the process needed to be authentic to avoid becoming a compliance burden.

Comments regarding *Effective verification of TEO quality* included the importance of incorporating stakeholder feedback (e.g. learners and industry) in evaluating TEO performance, and some caution about a narrow monitoring focus on assessment practice, and an over-reliance of quantitative data. Some submitters also commented on the importance of industry alignment and integration with standard setting bodies in quality assurance.

The iQAF's increased focus on *System performance* through activities such as environmental scans and thematic reviews was supported, providing they add real value and incorporate the data and views of other agencies, such as TEC and MoE. There was also a suggestion to include formal mechanisms for industry input and insights.

QUESTION 2: DO YOU THINK THE PROPOSED ENABLERS WILL BE EFFECTIVE IN SUPPORTING THE OVERALL QUALITY ASSURANCE APPROACH? WHAT WOULD YOU CHANGE OR ADD?

Most submitters supported the proposed enablers (data and insights, a risk-informed approach, and collaborative relationships) and recognised their potential to support effective quality assurance.

On *Data and insights*, submitters agreed that data could guide policy decisions and quality assurance processes. They stressed the importance of ensuring data accuracy and appropriate interpretation, avoiding data duplication, and maintaining transparency in data collection, usage and sharing. Some also called for consideration of qualitative data (e.g. stakeholder feedback) and supporting TEOs in using data for improvement.

Submitters strongly support *a risk-informed approach* rather than a one-size-fits-all model. They called for the risk assessment methodology to be robust, transparent and equitable, and for clear communication of risk assessment outcomes and intervention. They also suggested that risk indicators to be contextually appropriate, and support be given for TEOs to improve their risk profiles.

Collaborative and respectful relationships as an enabler was positively received. Submitters thought it will promote NZQA's understanding of TEOs, clarify expectations, and build trust. Recommendations for this enabler include assigning designated NZQA contacts for TEOs, ensuring sufficient resources to implement the enabler, reflecting Te Tiriti o Waitangi principles, and involving other regulators and standard setting bodies in the relationship.

Submitters called for more information on how the enablers will be implemented.

QUESTION 3: DO YOU THINK THE PROPOSED ACTIVITIES UNDER 'SET RULES' WILL HELP TEOs GET THINGS RIGHT THE FIRST TIME? WHAT WOULD YOU CHANGE OR ADD?

Submitters generally provided positive feedback and agreed that the proposed activities under 'set rules' will be effective. They stated clear rules will prevent misinterpretations and are crucial for TEOs to get things right the first time, ensuring a more efficient process.

Submitters commented on what the rules should be. Some felt the current rules emphasise administrative processes and do not adequately address quality criteria. While some asked for rules to be tailored to the unique context of some TEOs, other submitters suggested there should be less rules and that rules should be less prescriptive and allow TEOs to demonstrate their uniqueness.

Other suggestions were that NZQA should test rules, review rules regularly to align with sector needs, ensure consistent interpretation and application of rules, deliver rules and associated guidance in a timely way, and proactively communicate and engage with TEOs on rule changes. Several suggested NZQA to work with TEOs, industry regulators, peak bodies, or end users when setting rules.

Submitters also recommended some ways to help them understand and comply with rules, including using plain English, providing guidelines and workshops, having a searchable rules database, and publishing FAQs.

QUESTION 4: DO YOU THINK THE PROPOSED ACTIVITIES FOR 'EDUCATE AND INFORM' WILL CONTRIBUTE TO TEO CAPABILITY? WHAT WOULD YOU CHANGE OR ADD?

Submitters generally agree that the proposed activities under 'Education and Inform' will contribute to TEO capability and understanding of policy.

There is support for NZQA's role in educating and informing the sector, and having proactive and ongoing dialogue with TEOs. However, some suggested NZQA should clarify the roles of other stakeholders (e.g. industry bodies) in this lever and if the purpose of 'Educate and inform' is for promoting good practice or meeting compliance.

Submitters agree that access to system-wide data would help TEOs understand their performance and impact, and that sharing information and providing guidance are crucial for the system's effectiveness.

Submitters touched on a range of considerations for NZQA, including simplifying guidelines, developing diverse tools (e.g. online sessions and e-learning modules) to share information, making information about TEOs transparent and accessible to them and allowing two-way data sharing, helping TEOs to network and collaborate with each other, sharing best practices in collaboration with sector representatives, and managing the frequency of interactions and changes to avoid information overload and change fatigue.

QUESTION 5: DO YOU THINK THE PROPOSED ACTIVITIES UNDER 'APPROVE' COULD DRIVE MORE EFFECTIVE AND EFFICIENT PROCESSES? DO YOU HAVE OTHER SUGGESTIONS?

The proposed activities under 'Approve' are generally supported, with many seeing benefits in reducing administrative workload and fostering trust between NZQA and high-performing TEOs.

Many submitters considered that the proposed activities could drive more effective and efficient processes, allow providers to be more agile in responding to learner and market needs, and motivate high-performing TEOs to retain their status.

Submitters advocated for setting rule-based and meaningful criteria for approval, particularly for subject based accreditation. This will provide transparency and consistency. They asked for clarification on how TEO's compliance history and capability will be determined. Some also asked for the general approval processes to be improved for consistent decisions and timeframes, and for NZQA to provide actionable feedback to help TEOs prepare better applications.

Some submitters suggested NZQA to go further in the 'Approve' lever. For example, fast-tracking approval process for high-performing TEOs, including or aligning with regulators in the approval process to reduce compliance and duplication, tailoring criteria for different sectors and providers, and working collegially with SSBs to drive efficiencies.

Submitters emphasised that it is essential to collaborate with TEOs and foster continuous improvement through feedback mechanisms and periodic reviews.

QUESTION 6: WHAT SHOULD BE INCLUDED IN A SUCCINCT SELF-REVIEW REPORT TO ASSIST WITH A TEO'S REFLECTION AND ENSURE THE SELF-REVIEW IS AUTHENTIC?

Submitters suggested a wide range of topics to be considered for the self-review report. These include learner-centred design, meeting diverse learner needs, evidence-based practices, professional development for staff, evaluation of programme and resource quality, feedback from learners, staff and other stakeholders, and specific, measurable, achievable, relevant, and time-bound (SMART) actions for improvement.

Some submitters also made some recommendations on the design of the self-review template and process. They suggested NZQA to focus on TEOs' continuous improvement, clarify evidence required, balance self-reflection with independent verification, reflect the scale and context of TEOs in the self-review template, and align self-reviews with TEOs' other reporting requirements.

While agreeing with the value of self-review, submitters expressed concerns about the compliance burden self-review may pose on TEOs and the validity of self-review in reflecting TEO quality and performance. Some submitters worried the annual frequency of self-reviews may require extra work and increase the cost to providers. Others were concerned that although the self-review report may be succinct, it may require the same volume of data as the current four-yearly self-assessment activities.

Some submissions also questioned the adequacy of self-review to support quality improvement and NZQA's ability to provide feedback and validate the self-reflection in a timely manner. Others expressed concern that annual reviews could become a "tick-box" exercise rather than a tool for quality improvement.

QUESTION 7: DO YOU LIKE THE IDEA OF AN ANNUAL DISCUSSION WITH NZQA BASED ON A TEO'S ACTION PLAN? PLEASE GIVE YOUR REASONS.

Many submitters liked the idea of an annual discussion with NZQA. They thought the discussions could encourage honest, open, and supportive conversations and offer a chance for questions, clarification, and progress review.

However, there was concern from some that it would add to the stress and workload of TEOs, and whether it was of value to high-performing TEOs. Others questioned whether NZQA has sufficient resources to carry out annual discussions with TEOs and provide timely feedback.

Recommendations for NZQA include developing clear criteria to guide the discussion, providing consistent feedback, providing support to promote continuous improvement, having a designated NZQA contact, clarifying the purpose of the discussion and how the outcomes of discussion will be used, focusing on collaboration rather than compliance, and tailoring to the TEO.

Some submitters also urged NZQA to consider less frequent self-reviews and discussions or perhaps take a risk-informed approach to determine the frequency.

QUESTION 8: DO YOU SUPPORT A SHIFT TO MORE TARGETED, RISK-INFORMED MONITORING SUPPORTED BY PERIODIC MONITORING? PLEASE GIVE YOUR REASONS.

Consultation responses expressed support for shifting to more targeted, risk-informed monitoring. Many saw this approach as a positive step forward that is efficient and beneficial for ensuring high standards and better outcomes. The proposed approach was also seen as providing more clarity and up-to-date information, making the overall monitoring process more efficient and effective.

While the proposal to tailor monitoring requirements to each TEO based on track record and identified risks was welcomed, some responses expressed concerns about the robustness of the risk-informed approach. There was also concern about the reliability and value of periodic monitoring, such as the current degree monitoring, in assuring quality. Others were concerned that assessment-focus monitoring may not provide a comprehensive picture of quality.

Submitters asked for clear rules and operational details and suggested NZQA balance quality assurance with the operational realities of TEOs. They emphasised the need for right-sizing monitoring activities and stated that transparency in defining and rating risks and the frequency of monitoring is critical. They further suggested that monitoring needs to be robust and efficient, drawing on systematic data collection rather than periodic reviews. Some submitters stated that scheduling and planning for compliance activities could reduce burden, and synchronising with SSB compliance and reporting requirements could avoid duplication of effort and compliance tasks. Transparency in how providers are viewed and clear avenues for challenging findings were also considered important.

The submissions called for ongoing consultation and evaluation to ensure the monitoring process remains effective and fair. Some recommended engaging stakeholders, particularly industry, in the design of measures and monitoring. Others advocated for a shared view of quality with SSBs and publishing outcomes of monitoring activities for accountability and transparency.

QUESTION 9: DO YOU CONSIDER THAT THE PROPOSED INTEGRATED MONITORING ACTIVITIES ARE SUFFICIENT TO GIVE CONFIDENCE ABOUT A PROVIDER'S PERFORMANCE, WITHOUT CATEGORY RATINGS? PLEASE GIVE YOUR REASONS.

Many submitters viewed the proposed integrated monitoring activities as providing sufficient confidence about a provider's performance. Some thought integrated monitoring would provide real-time, comprehensive data and a more holistic view of each TEO's performance across various areas. Others commented that integrated monitoring has a stronger emphasis on continuous improvement of quality, as the system could identify and address potential problems before they escalate.

However, views on the removal of the external evaluation and review category rating were mixed. Some submissions supported moving away from the rating system. Others commented that the category rating could be at odds with external moderation and programme monitoring outcomes.

Some were concerned that losing category ratings may hinder informed decision-making for learners and their families, both domestically and internationally, as these ratings provide an easy-to-understand indicator for quick comparisons between providers. Concern was also raised about how the removal of categories may impact the operation of some agencies, institutions and education partners.

While some submitters called for further discussion with stakeholders regarding the removal of category ratings, others asked for alternative methods to maintain transparency in quality assurance and communicate quality markers to external parties. A clear timeline for phasing out category ratings and support for providers in adapting to the new system was also recommended.

QUESTION 10: DO YOU THINK THE PROPOSED RISK-INFORMED APPROACH TO MANAGING COMPLIANCE AND APPLYING INTERVENTIONS WILL BE EFFECTIVE? WHAT WOULD YOU CHANGE OR ADD?

Submitters were generally supportive of a risk-informed approach to managing compliance and applying interventions. Some saw the approach as fair, as it distinguishes between minor and major compliance issues.

Emphasis was placed on the importance of transparency in the process to build trust and ensure accountability. There was support for publishing the outcomes of

compliance actions, along with the need for a clear complaints procedure for providers.

There were requests for additional details about how the approach will serve learners, the specifics of rule changes, and questions about what constitutes non-compliance and serious non-compliance.

Suggestions included designing intermediate steps before statutory interventions to prevent escalation, reviewing previous compliance activities to assess their effectiveness, strengthening support for TEOs in improving their compliance monitoring systems, and building robust documentation and decision-making processes within NZQA to ensure continuity and reliability.

QUESTION 11: TO WHAT EXTENT DO YOU THINK THESE ACTIVITIES WILL BE EFFECTIVE IN SUPPORTING SYSTEM PERFORMANCE AND IMPROVEMENT?

The proposed activities were seen as highly effective in supporting system performance and improvement. Many respondents thought that if implemented effectively, these activities have the potential to significantly enhance system performance.

There was support for sharing data and insights among NZQA, TEOs, agencies, and other stakeholders. Submitters expect this will provide a broader understanding of TEO and sector performance, reduce duplication, and promote excellence and innovation.

However, submitters commented that the effectiveness of these activities will depend on the clarity and transparency of the measures and activities involved. Some suggested ensuring the technology/infrastructure supports the proposed activities. Thoughtful implementation with a focus on collaboration and actionable insights was seen as crucial.

Other submissions commented that establishing processes to anticipate and manage mismatches of supply and demand for skilled graduates is important. Monitoring credentials within the NZQCF and skill standards ensures relevance and alignment with industry requirements.

Some submissions also commented that thematic reviews could provide better insights into provider performance and systemic trends, for example, showing the provision for a specific industry or across qualifications.

Some suggestions for thematic reviews covered deliberate inclusion of data and evidence and not focussing solely on assessment. There was a call for further details on how thematic reviews will interface with other aspects of quality assurance and monitoring, and to ensure they do not become a compliance exercise.

Overall, it was suggested that system performance and driving improvement through proposed activities requires a holistic, data-driven approach to monitoring and enhancing the educational system.

ADDITIONAL THEMES

In addition to specific feedback for each iQAF component, some common themes came through from the feedback NZQA received:

Working with other agencies: Submitters emphasised the need for NZQA to collaborate with agencies, SSBs, and other regulatory bodies to streamline compliance requirements and avoid duplication.

Reflecting learner and stakeholder needs/voices: Many of the responses stressed the importance of incorporating learner voices and stakeholder input in the quality assurance process. Key suggestions include implementing a survey for all enrolled students to identify strengths, concerns, or issues; establishing formal mechanisms for industry, TEO and other stakeholder input; fostering a partnership-oriented relationship between NZQA and TEOs to enhance collaboration and system performance; and tailoring compliance requirements to the specific needs of different types of TEOs and delivery.

Evaluating iQAF: Many respondents emphasised the need to establish a process for evaluating the effectiveness of the quality assurance framework and regularly review and refine it to ensure it remains fit for purpose as the vocational education landscape evolves. It was also suggested that NZQA should incorporate feedback from TEOs and outline how stakeholder feedback will shape the framework to create a high-trust, low-bureaucracy environment.

Improving internal processes: Many commented on reducing compliance burden, suggesting NZQA streamline its internal processes, ensure robust documentation, and improve consistency.

Ensuring transparency: Many respondents emphasised the importance of transparency in designing the iQAF, in collaboration and consultation with stakeholders. They asked for transparency in data sources, quality assurance processes and decisions, and processes to determine TEO capability and risk.

Respondents also asked for clear communication of detailed implementation and transition planning.

CONSULTATION OUTCOMES AND NEXT STEPS

The purpose of the consultation was to seek the views of tertiary education organisations and other stakeholders on the draft iQAF framework and its components. Many submitters commented on the need for NZQA to develop the next layer of detail so they could fully envisage how the iQAF would work for individual TEOs in practice. However, overall the consultation feedback highlights strong support for the proposed framework and its intent.

The breadth and depth of the comments and suggestions we received has provided valuable insights and ideas for NZQA to consider when developing the details of the iQAF components. We will work through those details in the first half of 2025.

We will continue to engage with stakeholders such as peak bodies, advisory groups, SSBs, through our existing channels during the next stage of development.

We continue to work with agencies, such as the Tertiary Education Commission and Immigration New Zealand, and regulatory bodies to address the system-wide impacts of iQAF.

We will consult publicly on the details, related rules, and implementation plan for iQAF in the second half of the year.