



Consultation on describing tertiary education provider quality under iQAF: Summary of submissions October 2026

NZQA

Mana Tohu Mātauranga o Aotearoa
New Zealand Qualifications Authority



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EXECUTIVE SUMMARY

In August 2026, the New Zealand Qualifications Authority (NZQA) released a consultation document, [Describing tertiary education provider quality under iQAF](#). The consultation sought feedback on the proposed quality descriptor for tertiary education providers.

NZQA received 61 submissions from providers, peak bodies, standard setting bodies, and individuals involved in the tertiary education sector.

The submissions showed general support for a more nuanced view of provider quality instead of the compliant/non-compliant view originally proposed under iQAF.

However, feedback from the submissions showed strong concerns for the proposed design, particularly the adequacy of the four quality criteria and their evidence base in representing provider quality, and the reliability and validity of the scoring method.

While two-thirds of the submissions considered that the proposed criteria are useful quality assurance indicators, they asked for:

- the contributions of learner achievement, graduate outcomes, stakeholder confidence, equity, Te Tiriti o Waitangi, mātauranga Māori, cultural or wider educational impacts to be made more explicit
- better reflection of materiality and provider diversity at both the quality criteria and overall descriptor levels
- confirmation or testing of the scoring approach to ensure the evidence used and the scoring method can produce a valid and reliable summary of provider quality across the diverse tertiary education sector
- less frequent updating of the descriptor, a fair pre-publication review process, and publication of the descriptor with appropriate contextual information

There were also calls for NZQA to reconsider the implementation timeframe to allow regulatory activities under iQAF and changes to the vocational education and training system to embed, the review of Te Hono o Te Kahurangi to be completed, and sufficient testing of the potential impacts (positive and negative) of the proposed approach.

INTRODUCTION

NZQA began implementing the new integrated quality assurance framework (iQAF) in early 2026. iQAF guides our regulatory activities and processes for the quality assurance of tertiary education providers (TEPs) set out in the Education and Training Act 2020 and NZQA Rules.

Under iQAF, we originally proposed a 'compliant/non-compliant' view of TEP performance, supplemented by statutory interventions where appropriate. In response to iQAF consultation and agency feedback for a more nuanced view, we drafted the quality descriptor as an approach to summarise quality assurance outcomes and reflect a provider's effectiveness in delivering credible and robust qualifications and credentials.

We consulted on the approach, which covers three overall descriptors, four contributing quality criteria, the scoring method, and publication of the descriptors (see [Consultation on describing tertiary education provider quality under iQAF - NZQA](#)).

This report synthesises the feedback across all submissions, identifying the level of support, main concerns, and suggestions for the design of the proposed descriptor.

We have heard from many in the sector and appreciate the thoughtful, detailed, and constructive feedback and suggestions provided in the submissions. While this report cannot cover all comments made by each submitter, we will consider all the feedback received when further developing the descriptor design.

PUBLIC CONSULTATION PROCESS

In August 2026, the New Zealand Qualifications Authority (NZQA) published the consultation document [Describing tertiary education provider quality under iQAF](#) and invited public submissions.

The consultation document sought general feedback and specific feedback on aspects of the draft quality descriptor via six questions.

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

During the four-week public consultation period from 10 August to 7 September 2026, we held two online public information sessions and two targeted sessions with a peak body and representatives from the institutes of technology and polytechnics.

WHO WE HEARD FROM

We received a total of 61 submissions. These submissions came from individuals, private training establishments (PTEs), PTE peak bodies¹, standard setting bodies (SSBs), wānanga, institutes of technology and polytechnics (ITPs), and former industry training organisations (ITOs). Figure 1 outlines the number of submissions received by type of submitter.

Figure 1: Demographics of submissions received

Organisations	Number of submissions
Private Training Establishments	30
PTE peak bodies	3
Standard setting bodies	2
Institutes of technology and polytechnics	11
Wānanga	2
Former industry training organisations	7
Other	6
Total	61

HOW WE ANALYSED THE SUBMISSIONS

We reviewed and analysed all submissions received. The questions from the consultation document were used to structure the analysis and collate themes.

Microsoft CoPilot was then used to summarise the feedback.

We reviewed the accuracy of the summarised feedback and further refined the text to ensure it reflected the content of submissions.

¹ The three peak bodies collectively have approximately 200 registered providers.

SUMMARY OF SUBMISSIONS

The summary of submissions is presented under each consultation question. Some key feedback themes are presented under 'additional themes'.

Question 1: Do you think the proposed approach will be effective in summarising overall TEP quality? What other options would you suggest?

Feedback on the proposed approach is diverse. The quotes below from the PTE peak bodies reflect the range of views.

“...while QTI supports moving away from a binary compliance model, the proposed TEP Quality Descriptors introduce risks regarding evaluative subjectivity, narrow scoring bands, and sector instability from quarterly updates.”

“Member feedback is mixed on whether the proposed mandatory three-level descriptor is the best way to achieve this. ... We (ITENZ) ask NZQA to consider the following:

- Retain compliant/non-compliant as the clear baseline for regulatory and assurance purposes.*
- Consider separating the question of whether a provider meets the required standards from additional recognition of how well it meets or exceeds them.*
- Consider making the additional graded assessment optional...”*

“English New Zealand supports strong quality assurance foundations and a differentiation of provider effectiveness. ... However, based on the consultation document and criteria, it is difficult to see how ELS (English language providers registered primarily to deliver English language courses to international students) fit into the proposed approach in practice.”

Overall, submissions supported the moving toward a more graduated and transparent description of provider quality. However, most of the support was accompanied by strong calls for further refinement of the proposed approach before implementation. Submitters suggested changes to the overall descriptor, the quality criteria, the scoring method, and implementation.

Close to half of the submissions considered that the proposed criteria reflected regulatory interactions more than overall educational quality. A third called for stronger recognition of learner and graduate outcomes, equity outcomes, stakeholder voice, employer and industry confidence.

When responding to this question, many submitters specifically commented on the four quality criteria:

- **Programme and micro-credential design:** Submitters questioned using requests for further information, “minimal guidance” and application withdrawals as proxies for design quality. Comments suggested these measures may be influenced by programme complexity, innovation, unclear guidance or evaluator interpretation, and could discourage early engagement or innovative proposals.
- **Delivery of education and training:** Although a third of the submitters agree with giving delivery substantial importance, half of the submissions considered the proposed evidence base too narrow or potentially unrepresentative. They noted that risk-based monitoring, infrequent activity and small samples might not reflect a provider’s full delivery or learner experience.
- **Assessment practice:** About a third of the submissions recognised assessment as an important quality indicator. However, half raised concerns about reliance on post-assessment moderation, variability between moderators and between Industry Skills Boards, small or unrepresentative samples, or overlap with delivery monitoring. A small number of submitters asked for recognition of pre-assessment moderation, assessment design, internal moderation or improvement over time.
- **Quality management system implementation:** Nearly half of the submitters described an effective QMS as foundational or supported a minimum QMS expectation. Many requested clearer requirements and definitions of ‘meets’, ‘meets most’ and ‘does not meet’ expectations. They also emphasised the importance of distinguishing between minor administrative delays and material or systemic failures.

Many submissions also provided feedback on the scoring and weighting assigned to the quality criteria and the descriptors.

- A third of the submitters considered the 10-point scoring model too narrow and the proposed bands to determine the descriptor may create a ‘cliff-edge’ effect, i.e. a small change in one result could move a provider between descriptors.
- There were concerns that the percentage measures proposed in three criteria can be volatile when they are determined by few applications, monitoring activities or moderation outcomes. There were also concerns that assessment may be double-counted across delivery and assessment criteria, and that QMS matters may overlap with other criteria.
- One-third supported giving greater weight to recent evidence while avoiding indefinite carry-forward of older outcomes. Some proposed an ‘insufficient evidence’, ‘not assessed’ or ‘descriptor being established’ status where current evidence is not sufficient.

About one-fifth of the submitters recommended piloting the proposed approach across representative provider types and testing its sensitivity to provider size and evidence volume. They wanted NZQA to confirm that scores reliably indicate educational quality and that evaluators, monitoring teams and ISBs make consistent judgements before implementation.

Close to a third of the submissions sought clarification of the role of TEO self-review in the descriptor. They saw that information from the self-review could inform, contextualise or help address evidence gaps for the descriptor, but they also warned against discouraging candid self-review.

Question 2: Do you think 'Highly Effective', 'Effective', and 'Not Effective' are appropriate overall descriptors? What other options would you suggest?

“*[Submitter] understands NZQA's rationale for using the word effective, given that effective education and training is a desired outcome of iQAF. However, we consider Not Effective to be unduly severe as an organisation-level public descriptor.*”

While a third of the submissions considered 'Highly Effective' and 'Effective' clear or acceptable, over half of the submissions objected to or expressed reservations about 'Not Effective'. They saw the term as punitive or potentially misleading where a provider remains registered and continues to deliver approved education, or implying organisation-wide failure even when concerns may be isolated, temporary or already being addressed. Proposed alternatives included 'Not Yet Effective', 'Improvement Required', 'Developing', 'Developing Effectiveness', or 'Partially Effective'.

About one-third of the submissions commented on the wide score band for the 'Effective' descriptor (5-8 points). Some suggested adding a fourth category while others suggested publishing criterion-level results so that providers at different points within the wide 'Effective' band are not presented as identical.

Five of the submissions preferred assurance-based language, such as “High Assurance”, “Assurance” and “Limited Assurance”, to better reflect what the regulatory evidence demonstrates.

Two submissions explicitly favoured retaining compliant/non-compliant as the regulatory baseline, with one suggesting making graded recognition optional.

Question 3: For the ‘quality management system implementation’ criterion, should there be a minimum score required for a TEP to be assigned the ‘Highly Effective’ and ‘Effective’ descriptors? What would you suggest?

“ We agree with this approach in a general sense, but look forward to more detail on NZQA expectations of our quality management system. ”

About half of the submissions supported a minimum threshold for the ‘quality management system implementation’ criterion, especially for the ‘Highly Effective’ descriptor. They saw an effective quality management system as foundational to quality and good governance.

While some submitters specifically proposed a 2-point threshold for ‘Highly Effective’ and a 1-point threshold for ‘Effective’, about one-fifth cautioned against a rigid mechanical threshold, particularly while the criterion is assigned only two points and its detailed requirements are not yet published.

About half of the submissions called for NZQA to distinguish minor administrative lapses, such as late reporting, from serious or systemic QMS failures that materially affect learners, assessment integrity, quality systems or credential credibility.

Question 4: Looking at the provider examples in Appendix 1, do you think the proposed approach sufficiently reflects the diverse nature of TEPs, and the materiality of quality criteria outcomes?

“ The examples are useful, but they do not yet demonstrate sufficiently how provider diversity, evidence sufficiency and materiality will influence the descriptor. ”

Two-thirds of the submissions considered that the Appendix 1 examples did not sufficiently demonstrate how the model would account for provider size, scope, delivery model, learner volume, programme complexity, regulatory exposure, or the difference between isolated and systemic issues.

Submitters sought tailored or additional scenarios for work-based learning providers, re-established ITPs, wānanga, English language providers only delivering short courses, dual-regulated providers, or large providers with small standards-based portfolios. For example:

- **Work-based learning:** recognise employer and workplace roles, supervisor capability, authentic workplace evidence and the limits of provider control within employment settings.
- **Large and complex providers:** account for programme breadth, learner volume, multiple sites and greater exposure to regulatory activity; distinguish localised issues from organisation-wide failure.
- **Small, specialist and high-volume short-course providers:** provide an 'insufficient-evidence' option where a robust judgement cannot be made, and recognise practical and scenario-based assessment, limited standards portfolios, subject-matter expertise and the risk of incentivising written evidence over authentic demonstration.
- **English language providers only delivering short courses:** develop criteria suited to non-award provision and recognise established sector-specific standards and audits.
- **Dual-regulated providers:** recognise evidence from specialist statutory regulators and avoid duplicated or conflicting assurance requirements.

The question of materiality was a key topic commented on by many submitters throughout their submissions. At least half of the submissions asked NZQA to publish or apply materiality principles covering provider scale and complexity, learner impact, severity, recurrence, whether issues were isolated or systemic, provider response, evidence reliability, and qualification integrity.

Some of the materiality concerns raised were:

- Large and complex providers would have greater regulatory interaction with NZQA and may be disproportionately exposed to outcomes that would impact their overall descriptor;
- Small or specialist providers may have less interaction with NZQA, but a single outcome could impact on their descriptor score;
- Risk-informed monitoring may increase the possibility of adverse outcomes. They asked NZQA to explain how differences in monitoring intensity will be normalised so that more frequently monitored providers are not disadvantaged;
- A statutory action should not automatically override a cumulative score without considering the seriousness, scope and duration of the action, the proportion of learners affected, whether the issue is isolated or systemic, the provider's response, and whether corrective action has been verified.

Question 5: Do you have any comments or suggestions for issuing and publishing the overall quality descriptor?

“ A short contextual statement, agreed with the provider, should be published alongside the descriptor so that readers understand what it does and does not measure. ”

About two-thirds of the submissions supported publication but wanted publication to be accompanied by sufficient context. Suggested accompanying information included the overall descriptor, criterion-level results, evidence period and sources, sample size and coverage, whether evidence had been carried forward, key strengths, areas for improvement, and whether concerns were programme-specific or organisation-wide.

Over half of the submissions considered quarterly update of descriptors too volatile or burdensome, especially where new evidence is infrequent or based on small samples. They preferred annual or two-yearly publication, with earlier updates only for material concerns or verified improvements.

Submitters called for a clear, timely and accessible review, appeal or pre-publication correction process. One-third of the submitters specifically said providers should not be charged to correct factual, calculation or data errors attributable to NZQA or another source body.

About one-fifth of the submitters sought clear protocols preventing the descriptor from being used in isolation for funding, immigration, promotion or risk decisions. They also highlighted the descriptor's potential effects on international recruitment, education agents, transnational partnerships and long-term contracts, and called for coordinated public guidance explaining what the descriptor does and does not measure.

Question 6: NZQA will need to use outcomes from quality assurance activities over a specific timeframe to determine an initial overall descriptor for each TEP. What timeframe would you suggest is appropriate?

“ [Submitter] does not have sufficient evidence to recommend a specific period. More important is that the period provides enough evidence for a robust judgement without allowing outdated information to stand indefinitely as evidence of current quality. ”

Submitters proposed a range of initial descriptor outcome windows, from 12 months to three years. At least half of the submissions emphasised that the decisive issue was whether the outcomes would be current, sufficient, representative and relevant to the provider's present circumstances, rather than the exact length of the window.

The re-established ITPs and former work-based learning divisions requested that their initial descriptor should reflect outcomes generated under current governance and QMS arrangements, rather than inherited outcomes from Te Pūkenga.

Ten submitters called for delaying implementation of the descriptor until one or two full iQAF annual cycles have been completed, or until guidance, rubrics, QMS requirements or monitoring settings are published. Several submitters also suggested that piloting, sensitivity testing, or validation of the descriptor should be carried out prior to implementation.

Additional themes

In addition to feedback on the consultation questions, two other important themes are noted below:

- **The role of Te Tiriti, mātauranga Māori, and Te Hono o Te Kahurangi**

Submissions from ngā Wānanga and Māori education perspectives recommended embedding Te Tiriti o Waitangi, mātauranga Māori, te reo Māori, tikanga Māori, āhuatanga Māori, Māori learner success, whānau and iwi aspirations, and culturally grounded definitions of quality.

They sought alignment with Te Hono o Te Kahurangi (THoTK) and considered that THoTK should shape the national framework, rather than sit alongside it.

Ngā Wānanga requested recognition of their statutory role and distinctive quality outcomes, including outcomes for whānau, hapū, iwi, cultural revitalisation, te reo Māori, mātauranga Māori and community.

- **Alignment and duplication**

A third of the submissions asked NZQA to align evidence requirements with TEC, other regulators or assurance bodies, and share information to reduce duplicate reporting, monitoring and audits.

They recommended that sector and professional assurance should be recognised where relevant, including Civil Aviation Authority oversight,

English New Zealand audits, professional accreditation, Teaching Council processes and other statutory or industry-based quality systems.

While submitters suggested information sharing between agencies and other regulators, they also sought clarity about what information will be shared, the purpose and currency of that information, safeguards for Māori data sovereignty, safeguards for commercially sensitive and learner-level data, and how providers can correct it.

CONSULTATION OUTCOMES AND NEXT STEPS

The consultation feedback has provided support for a more nuanced view of provider quality than compliant/non-compliant. However, the feedback also suggests the proposed quality descriptor methodology requires further development and testing.

We will use the detailed feedback from the consultation to review and further develop the quality descriptor, and test design options with provider representatives, agencies, SSBs and other regulators.

We will report back and seek further feedback from the sector as we progress.