



Mana Tohu Mātauranga o Aotearoa  
New Zealand Qualifications Authority

## **Aide-Memoire: Consultation on final design of the integrated Quality Assurance Framework**

<b>To:</b>	Hon Penny Simmonds, Minister for Vocational Education
<b>Cc:</b>	Hon Shane Reti, Minister for Universities Hon Erica Stanford, Minister of Education
<b>From:</b>	Dr Grant Klinkum, Chief Executive
<b>Date:</b>	24 July 2025
<b>Reference:</b>	OC01887

### **Purpose**

1. To notify you of NZQA's plan to publicly consult on the final design of the integrated Quality Assurance Framework (iQAF) in August 2025. The consultation document is attached.
2. NZQA proposes to proactively release this briefing as part of the next publication of documents.

### **Background**

3. We consulted on the high-level design of a draft quality assurance framework for the tertiary education and training sector (excluding universities) in October-November 2024 (OC01270 refers).
4. 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.
5. This second round of public consultation focuses on the next layer of detail and the relevant rules to support the implementation of the iQAF in 2026.
6. Proposed rule changes necessary to support the implementation of the Education and Training (Vocational Education and Training System) Amendment Bill are also included in the consultation document.
7. We have engaged with a range of stakeholder groups on finalising the design of iQAF. These included our cross-sector advisory group, education agencies, Workforce Development Councils, Private Training Establishment (PTE) Peak Bodies, Te Pūkenga, Workforce Development Councils, Wānanga, and Māori PTEs.
8. The NZQA Board will decide whether to endorse the consultation at its meeting on 28 July 2025.

9. We propose to start consultation from mid-August for a period of six weeks.
10. Pending the consultation outcomes, we will continue to work closely with agencies and the sector to finalise the relevant rules and NZQA processes required to support iQAF.
11. We expect a phased implementation to take place throughout 2026.



**Dr Grant Klunkum**

Chief Executive, NZQA

24 July 2025

**Hon Penny Simmonds**

Minister for Vocational Education

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**NZQA**

Mana Tohu Mātauranga o Aotearoa  
New Zealand Qualifications Authority

**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 scheduled 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 from January 2026.

## How to have your say

NZQA seeks written submissions on the proposed Integrated Quality Assurance Framework by 5pm on **XX September** 2025.

You can respond:

- Online: <https://www2.nzqa.govt.nz/about-us/consultations-and-reviews/iqaf/>
- Email: Send your submission as a Microsoft Word document or searchable PDF to [QAFredesign@nzqa.govt.nz](mailto: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.

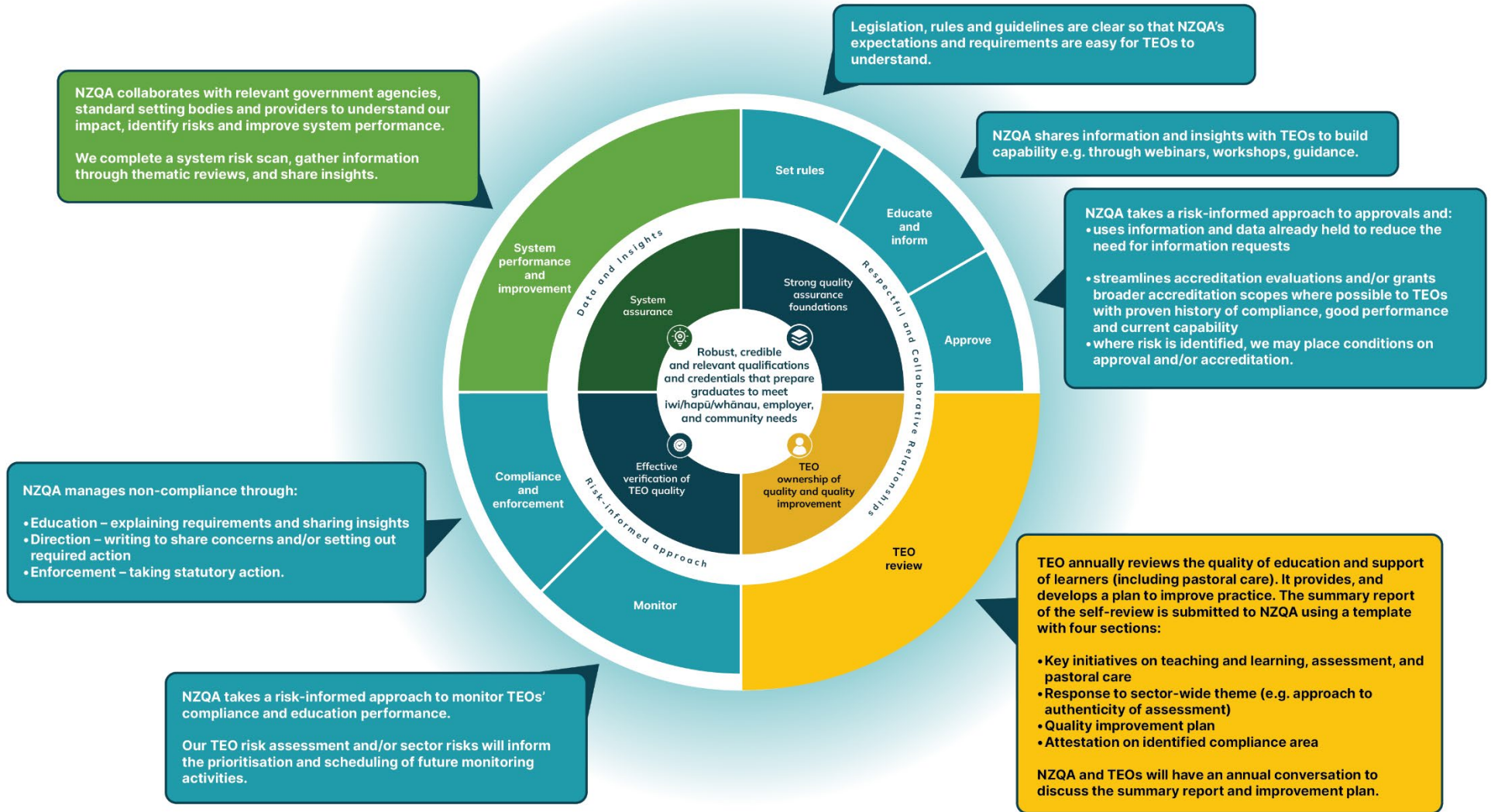
NZQA will not use or disclose your personal information without your consent, unless authorised or required by law. We may contact you directly if we require further clarification of any matters in your submission. Your submission may be publicly disclosed in official documents or as required by the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

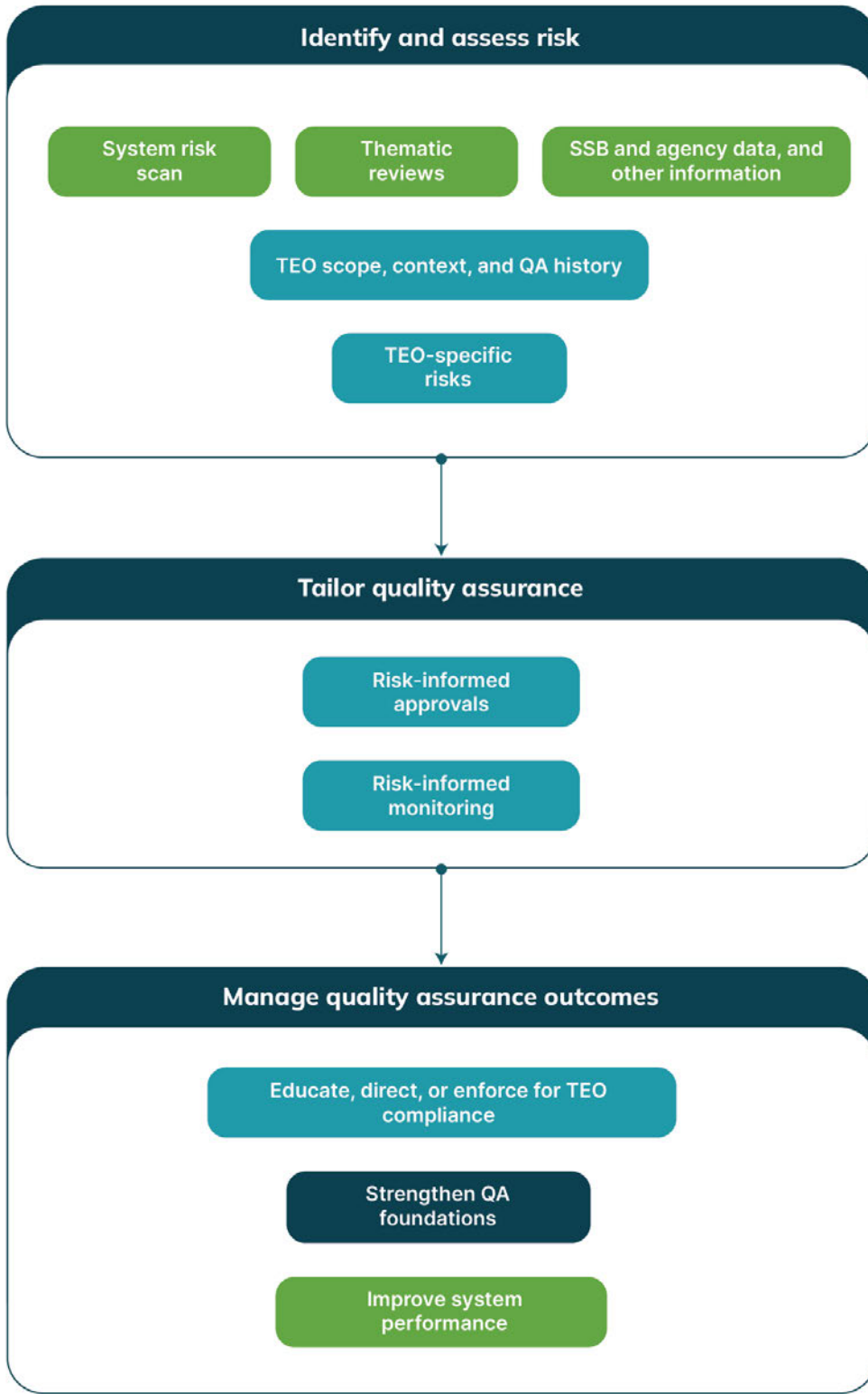
At the system level, we work with agencies, SSBs, providers, and learners to identify trends, changes, and potential risks through system risk scans and thematic reviews, and through monitoring the use and relevance of qualifications and micro-credentials.

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).

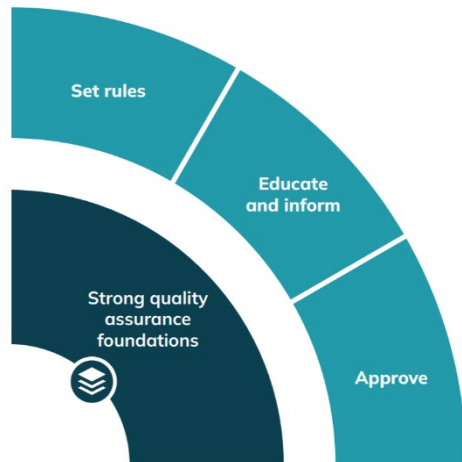
We will use the outcomes of quality assurance activities to improve the performance of individual TEOs, and/or strengthen quality assurance foundations through improving rules, guidance, and processes. We will also share any insights gained from the analysis of quality assurance outcomes with providers, 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 must be approved by the NZQA Board and the Minister of Education.

Our rules will:

- meet the published standards for secondary legislation
- be guided by the Parliamentary Counsel Office's Plain English Standard
- 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.

### 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.



### Questions

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



TEOs have ownership of quality and quality improvement and will:

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

### Self-review

TEO self-review reflects the important role each TEO has in maintaining the credibility of the qualifications system. TEOs are responsible for the quality of the education and training delivered, including learner wellbeing and support.

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.

The self-review is also an opportunity for a TEO to confirm it is meeting the requirements of the Act, NZQA rules and the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 (the Code).

As a cornerstone of the iQAF all TEOs will be required to conduct a self-review annually.

### TEO Self-Review Summary Report

Following the self-review NZQA will require the TEO to submit a summary report to:

- provide evidence of the effectiveness of the TEOs review processes
- demonstrate how well the TEOs understands its performance and the contributing factors
- identify areas for improvement in a quality improvement plan
- attest to its compliance with regulatory requirements.

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

Following each round of thematic reviews, NZQA will:

- collate and analyse data from the specific theme to inform its understanding of practice across the system and identify system risks and opportunities; and
- report back to the sector on its findings.

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

## NZQA Analysis

In preparation for an annual conversation with each TEO, NZQA will:

- review all available information on a TEO's performance and compare that with the TEO's self-review summary report on its performance
- monitor progress towards improvement goals as subsequent reports are submitted
- identify areas to discuss with the TEO about progress and priorities for the coming year, including any areas the TEO may not have reported on.

## Annual conversation

Having synthesised information on the TEO performance and considered the TEO's self-review summary report, NZQA will arrange a conversation with each TEO. The aim of the conversation will be to establish and maintain an open, transparent relationship between NZQA and the TEO. The conversation will canvas the:

- evidence and data of the TEO's performance
- challenges and progress on any improvements identified in the TEOs previous self-review summary report; and
- any areas identified in the current self-review summary report.

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. The TEO representatives must be senior enough to be able to make commitments on the TEO's behalf.

Following the conversation NZQA will prepare a summary of the conversation and any agreed actions that will then be shared with the TEO.

It will be important to the success of this system that the process is not drawn out. There will be an agreed limit on the time taken by NZQA to:

- engage in a conversation with the TEO following receipt of the TEOs report; and
- report back to the TEO following the annual conversation.

### **Managing evidence of poor performance**

Should NZQA identify significant weaknesses through its risk assessment and analysis of performance data which the TEO has not reported, it will raise these during the conversation with the TEO.

If the TEO has identified and confirms the issue, the parties will discuss remediation actions and strengthening their quality improvement plan. If the TEO has not identified the issue, following discussion, NZQA may request it be included in the quality improvement plan.

While NZQA will periodically review progress on actions in the plan, identification of issues through the self-review process will not normally trigger formal monitoring or investigative work, until the TEO has had a reasonable opportunity to address the issue. In exceptional circumstances where there is a risk to learners, further inquiry by NZQA may be initiated.

### **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 submission and conversation.

The requirements to undertake a self-review of their compliance with 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:
  - 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 permanent prompt question in the annual conversation
- periodically conduct thematic reviews on aspects of the Code, e.g.
  - accommodation standards
  - 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 a requirement to commence self-reviews in 2026. We will work with TEOs to determine an engagement schedule, including 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 self-reviews will be agreed as part of the registration process.



### Questions

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 micro-credentials 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, self-review 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 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 [tertiary evaluation \(quality\) indicators](#) along with other guidance to provide examples of good education performance.

Monitoring of education performance 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:

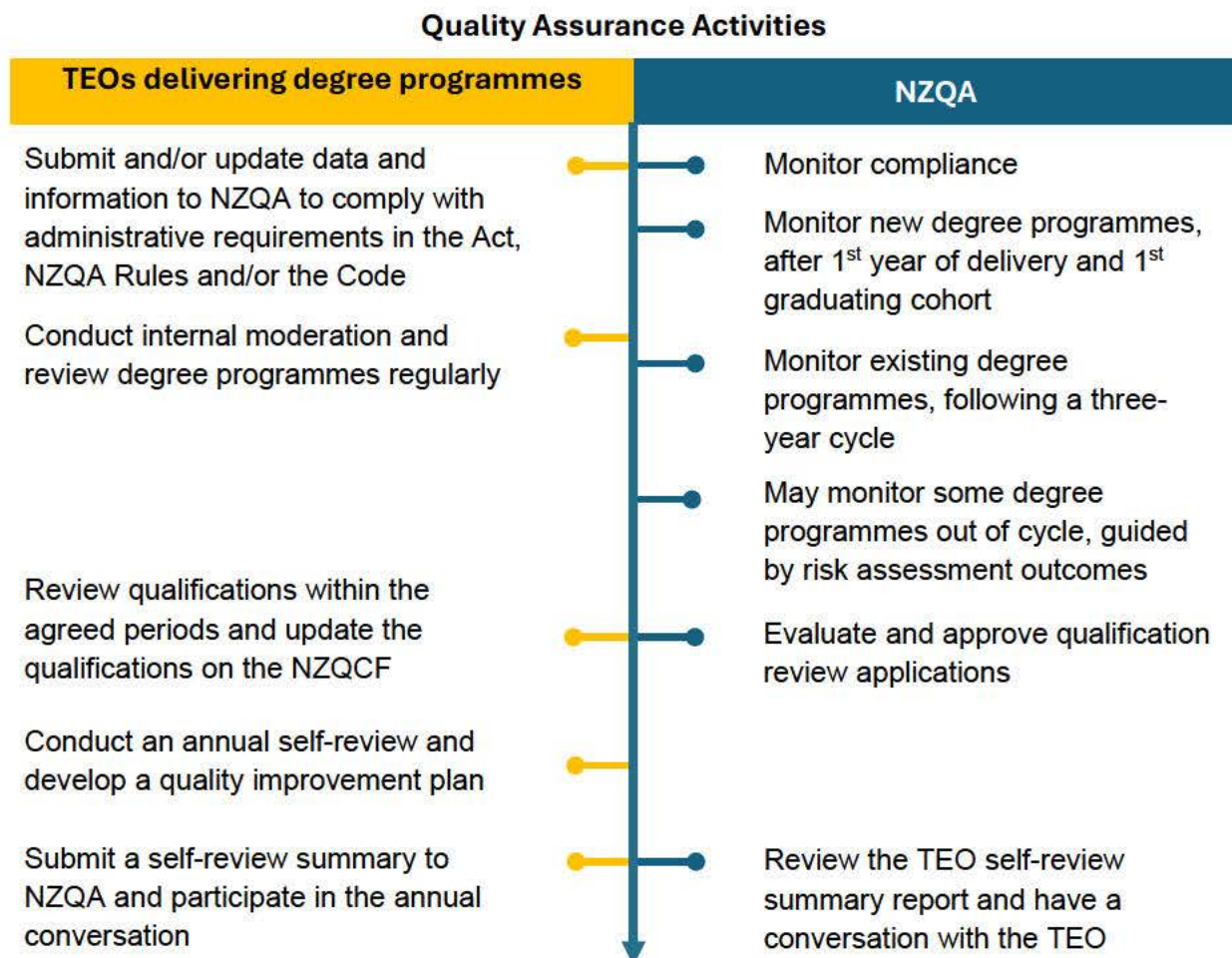
- The TEO prepares a programme evaluation report
- NZQA staff and an appointed external monitor will undertake a site visit
- NZQA prepares a monitoring report.

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**



## **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.

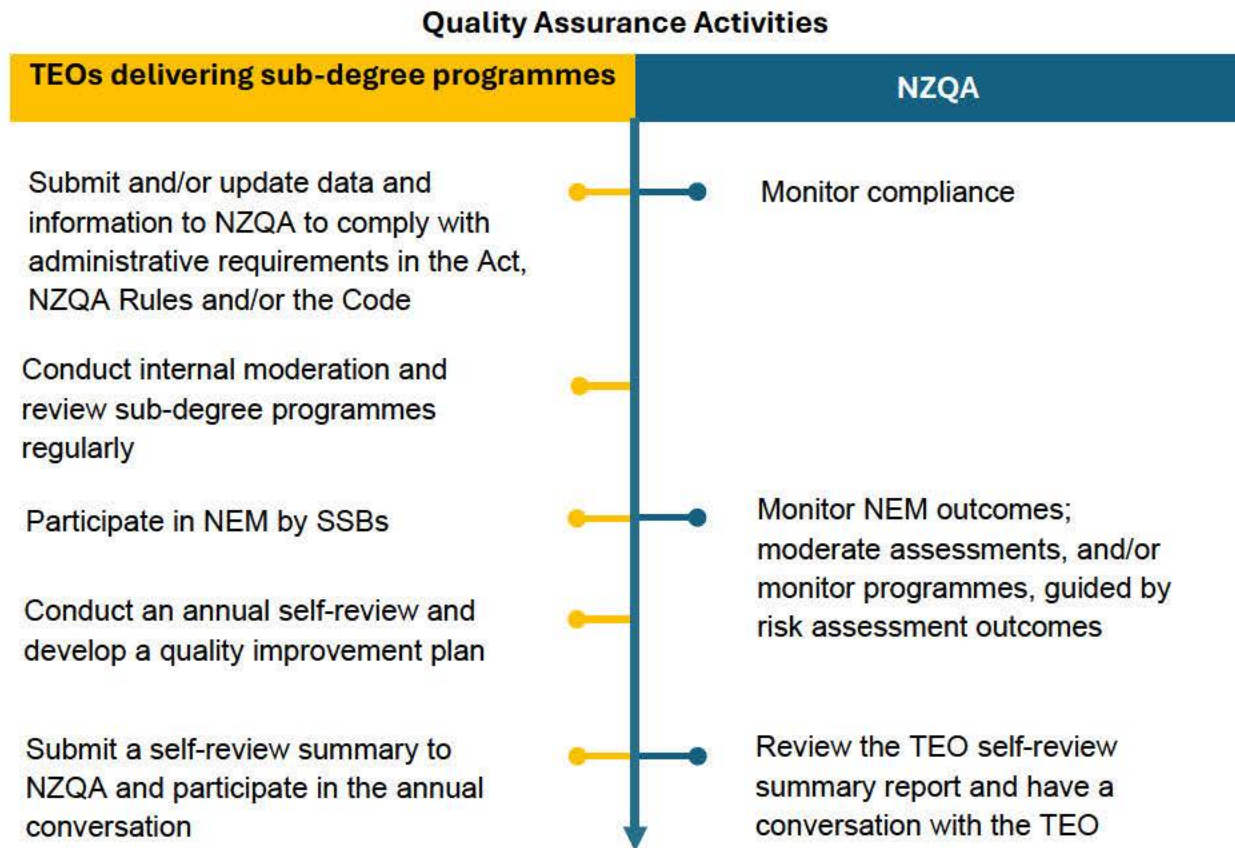
For programmes without standards, we will:

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

Where NZQA resources allow, we will monitor a newly approved programme after the first graduating cohort.

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**



### **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.

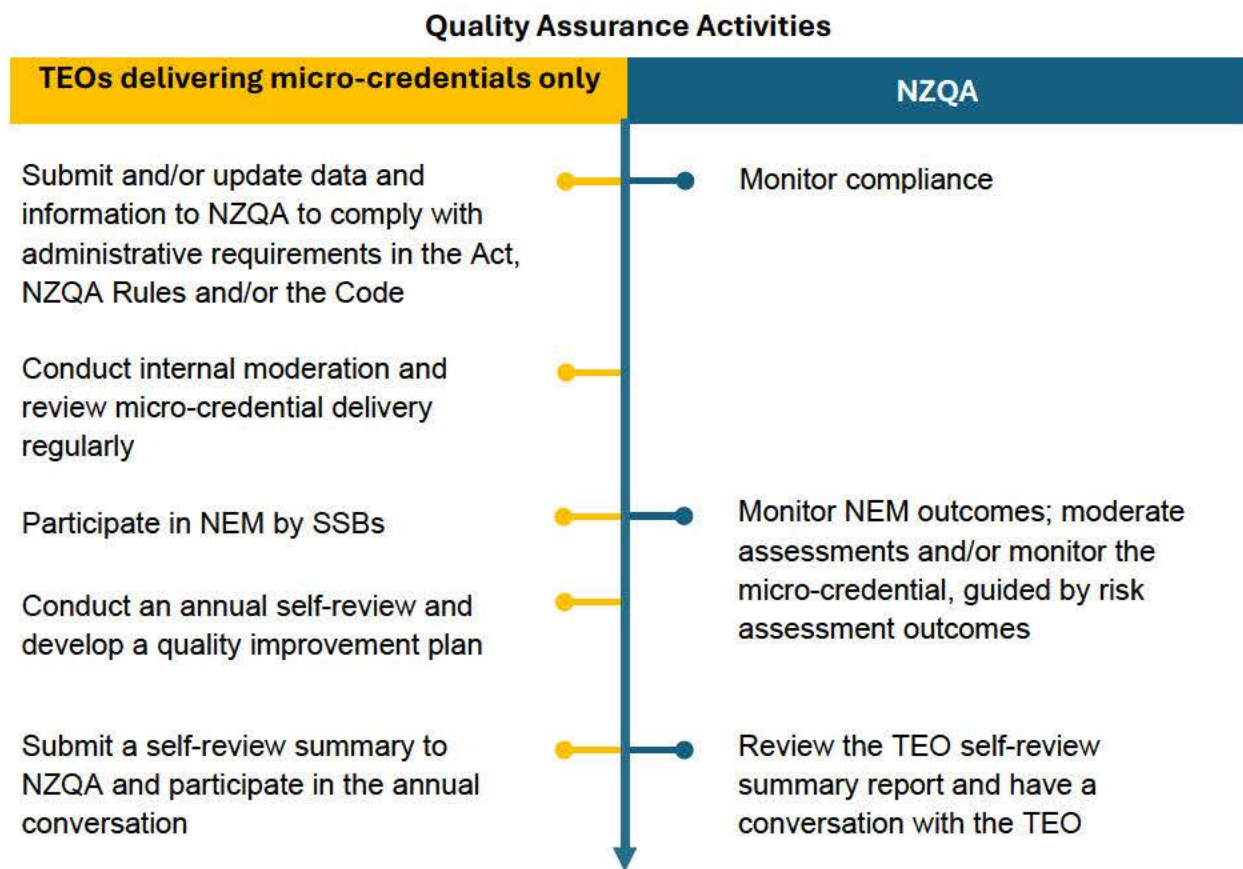
For micro-credentials that are part of a programme leading to a qualification we will:

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

Where resources allow, we will monitor a newly approved micro-credential after the first graduating cohort.

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**



### *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.

### *Prioritising monitoring activities*

As described in the TEO Review section, the primary responsibility for providing high quality education rests with the TEO. NZQA resources only allow for monitoring a relatively small percentage of all TEO programmes and micro-credentials.

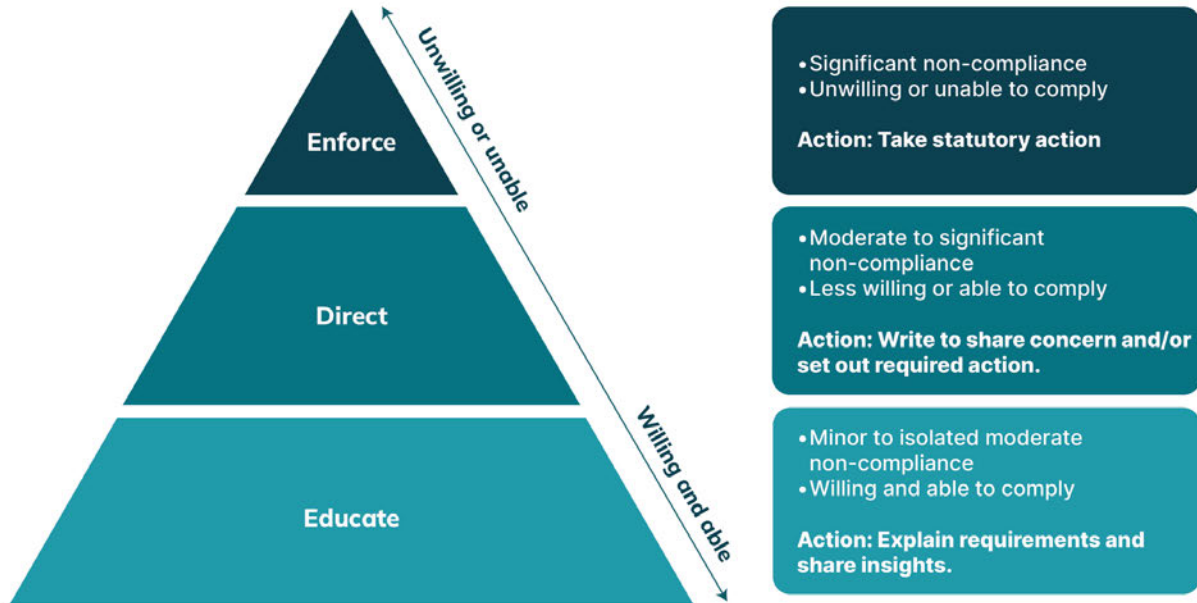
The risk-informed approach described on page 30 informs NZQA's monitoring schedule within and across TEOs.

### **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, NZQA monitoring will escalate to an organisational level approach – i.e. we will monitor the TEO against the criteria set out in the new Quality Assurance Rules.

### **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 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 [Simplify New Zealand Qualifications](#) 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.

Other quality assurance activities also contribute to monitoring graduate outcomes:

- WDCs (SSBs) have a strengthened 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
  - 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 (APERs), 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:

- sharing data and information with standard setting bodies and other agencies
- conducting risk scans and thematic reviews
- sharing insights.

### 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, micro-credentials 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 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 learners.

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. This might involve sharing with TEOs, agencies and/or the public any issues, key trends, or best practices, including via [Monitoring summary reports](#) and [Insights papers](#).

As an example, mātauranga Māori, te ao Māori, and te reo Māori are valued in the NZQCF and can be included in qualifications and micro-credentials. 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 iwi/hapū/whānau, employer and community needs*. In addition to the measurement of specific aspects of the framework through

NZQA's [Statement of Performance Expectations](#), 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 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>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.

Ngā Mātāpono are the values that NZQA aims to demonstrate through its work every day. They are:

- **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.

A full description of our values can be found here: [Ngā Mātāpono Our values - NZQA](#).

We will demonstrate Ngā Mātāpono 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 Micro-credential 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 an agreed period. 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.



#### Questions

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

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.

And 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 topic.



### Questions

8. Do you have any comments or suggestions for the proposed changes to programmes that comprise skill standards?
9. Do you have any comments or suggestions for Rules changes to support streamlining accreditation?

## Programme Approval, Recognition, and Accreditation Rules and the Micro-credential 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:
  - 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

10. 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
  - 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.



### Question

11. 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.



### Question

12. 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

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”.

#### ***Proposed quality assurance***

The Education and Training (Vocational Education and Training System) Amendment Bill 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
  - 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
  - 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 learning

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 self-review 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).



### **Questions**

13. Do you have any suggestions for matters NZQA needs to consider in Rules for ISBs?
14. Do you have any suggestions for matters NZQA needs to consider in Rules for work-based learning?
15. 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.
- 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 [Rules@nzqa.govt.nz](mailto:Rules@nzqa.govt.nz).

## After the consultation

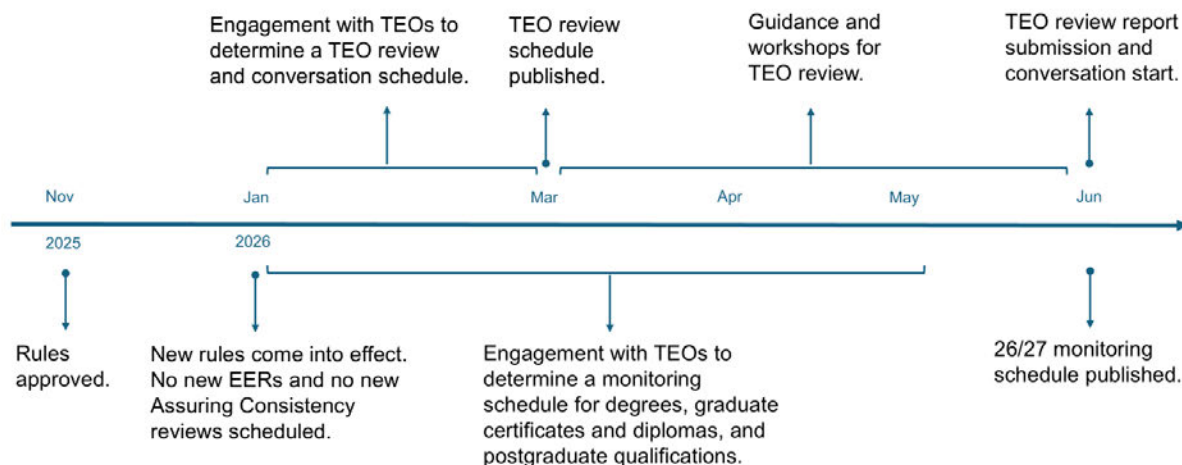
We will consider your feedback on the proposed iQAF levers and activities and recommended rule changes. We will then fine-tune the activities and prepare new or amended rules for NZQA's Board and the Minister of Education's approval.

New or amended Rules will be introduced in the first quarter of 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**



# 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 micro-credentials? If not, what would you change?
- Question 6. Do you think the combination of compliance 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 changes to programmes that comprise skill standards?
- Question 9. Do you have any comments or suggestions for Rules changes to support streamlining accreditation?
- Question 10. Do you have any comments or suggestions for the proposed Rule changes to specify the nature and frequency of monitoring activities?
- Question 11. Do you have any comments or suggestions in relation to the purpose or scope of the Quality Assurance Rules?

- Question 12. Do you have any comments or suggestions in relation to consequential changes to the Private Training Establishment Registration Rules?
- Question 13. Do you have any suggestions for matters NZQA needs to consider in Rules for ISBs?
- Question 14. Do you have any suggestions for matters NZQA needs to consider in Rules for work-based learning?
- Question 15. 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			
<b>Section One:</b>	<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: <ul style="list-style-type: none"> <li>teaching and learning</li> <li>assessment</li> <li>pastoral care</li> </ul> highlighting your successes and challenges relating to these.			
<b>Section Two</b>	<b>Thematic review question</b> <i>e.g. Please provide a 1–2-page summary of your organisation’s practice and performance on Recognition of prior learning (RPL).</i> A link to Information on RPL on the NZQA website is <a href="#">here</a>		
<b>Section Three</b>	<b>Quality Improvement Plan</b> 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)			
<b>Section Four</b>	<p><b>Attestation</b></p> <p>Please confirm the organisation is compliant with the following:</p> <p><input type="checkbox"/> a list of NZQA Rules as relevant to the TEO context will be provided e.g., Programme Approval, Recognition, and Accreditation Rules</p> <p>and</p> <p><input type="checkbox"/> Education (Pastoral Care of Tertiary and International Learners) Code of Practice</p> <p><input type="checkbox"/> All programmes and micro-credentials meet the notional learning hours required to achieve the specified credit value.</p>		
<p>Signed on behalf of TEO</p> <p>.....</p> <p>Name:</p> <p>Position:</p> <p>Date:</p>			

**Information Update: Finalising the design of the integrated quality assurance framework (iQAF) and changes to NZQA Rules**

<b>To:</b>	Hon Penny Simmonds, Minister for Vocational Education		
<b>Cc:</b>	Hon Shane Reti, Minister for Universities Hon Erica Stanford, Minister of Education		
<b>Date:</b>	15 October 2025	<b>Priority:</b>	Medium
<b>Security Level:</b>	Unclassified	<b>OC No:</b>	OC02125
<b>Key Contact:</b>	Dr Grant Klinkum	<b>DDI:</b>	[REDACTED]
<b>Deputy Chief Executive:</b>	Emily Fabling	<b>DDI:</b>	[REDACTED]

**Purpose**

1. To update you of the outcomes of NZQA’s consultation on finalising the design of the integrated Quality Assurance Framework (iQAF), and Rules changes to support iQAF and the Vocational Education and Training (VET) reforms.

**Alignment with Government priorities**

2. The redesign of the quality assurance framework for tertiary education organisations (excluding universities) aligns with the redesign of the VET system and priorities set out in the new *Tertiary Education Strategy*.
3. The Government’s priorities also include improving the quality of government regulation, ensuring that decisions by regulators are based on principles of good law-making and economic efficiency<sup>1</sup>. Like other agencies, NZQA’s focus is on lifting the performance of the regulatory systems we own, to meet our regulatory stewardship obligations.

**Background**

4. NZQA recently reviewed its regulatory framework, with input from the Ministry for Regulation. We have established three regulatory principles to support NZQA to be a modern regulator – **impact-led, anticipatory, and adaptable**.
5. The integrated quality assurance framework (iQAF), resulting from the redesign of our quality assurance framework, reflects these regulatory principles. It aims to reduce compliance burden across the sector, improve efficiency, offer NZQA a more up-to-date view of Tertiary Education Organisation (TEO) performance, and effect change.
6. The quality assurance framework for TEOs (excluding universities) has become complex over time. New quality assurance activities such as Assuring Consistency Reviews, Code monitoring, and sub-degree monitoring have been added to the current

<sup>1</sup> See Goals and priorities, [Budget Policy Statement 2025](#).

EQAF (Evaluative Quality Assurance Framework) system since its introduction in 2009. New activities look at discreet elements of quality and are not sufficiently integrated into our overall regulatory activities and stewardship.

7. In July, we informed you of our intention to consult on the detailed design of the draft iQAF and related Rule changes; and Rule changes to support the Vocational Education and Training (VET) reforms [OC01887 refers]. We have now completed consultation which took place between 18 August and 26 September 2025.
8. We received 59 submissions from Private Training Establishment (PTEs), Te Pūkenga business divisions, standard setting bodies, peak bodies, wānanga, agency, and individuals. We also had working level sessions with agencies, across the Ministry of Education, Tertiary Education Commission and Immigration New Zealand.

### **Support for a risk-informed approach to NZQA approvals and monitoring ...**

9. Overall, the iQAF is seen as a significant modernisation of NZQA's quality assurance system, and many submitters welcomed the shift to a more tailored, risk-informed approach to quality assurance. Feedback continues to reflect the sector's desire for transparency and proportionality, and reduced duplication and compliance burden, which is what iQAF aims to deliver.
10. Submitters acknowledged and strongly supported NZQA's proposals to simplify approval and accreditation processes and further reduce compliance burden by shifting to a three-year monitoring cycle for degree (and above) programmes.
11. While some TEOs expressed some concern with the annual frequency for the self-review submission and conversation with NZQA, there was also broad support for NZQA's proposal to shift from "episodic, high-stakes reviews [*via External Evaluation and Review (EER)*] to an ongoing improvement cycle". Many TEOs also appreciated the integration of the Code of Pastoral Care attestation with the self-review process. We envisage this more frequent, and succinct interaction will also enable NZQA to be more closely connected with the TEO's current state than the (typically) four-yearly EER.
12. There was broad support for a risk-based approach to monitoring sub-degree programmes and micro-credentials, particularly where it reduces duplication, supports continuous improvement, and is applied fairly across different provider types and programme structures. Submitters emphasised the need for transparency, proportionality, and sector-specific support.
13. Submitters agreed that consolidating administrative and compliance requirements into a single Rule set would improve clarity, consistency, and usability. Integration of Code monitoring, thematic reviews, and annual reporting was also welcomed. Feedback emphasised the need for clear guidance and support, including templates, exemplars, and resources that illustrate "what good looks like."
14. There was broad support for the development of clear and transparent Rules for Industry Skills Boards (ISBs), transitioning from Workforce Development Councils (WDCs). Submitters recognised the critical role ISBs will play in standard-setting, qualification development, programme endorsement, and moderation, and agreed that consistent expectations are needed.

### **... reducing the compliance burden for providers**

15. We heard from some submitters that they were concerned compliance activity may increase after the implementation of the iQAF. The simple table below shows the shift in activity from the current Evaluative Quality Assurance Framework (EQAF), introduced in 2009 and added to over the last 15 years, and the iQAF:

EQAF activities	iQAF activities
<ol style="list-style-type: none"> <li>1. External Evaluation and Review <ul style="list-style-type: none"> <li>• up to 4-yearly cycle</li> <li>• 3-6 months for each process</li> <li>• self-assessment addressing six key evaluation questions and 35 Tertiary Evaluation Indicators</li> </ul> </li> <li>2. Degree monitoring <ul style="list-style-type: none"> <li>• annual monitoring of all programmes by NZQA or providers</li> </ul> </li> <li>3. Sub-degree and micro-credential monitoring <ul style="list-style-type: none"> <li>• risk-informed monitoring</li> </ul> </li> <li>4. Approval and accreditation processes <ul style="list-style-type: none"> <li>• faster processing for TEOs with good EER rating</li> <li>• multiple requests for information</li> </ul> </li> <li>5. Assuring consistency</li> <li>6. Code annual self-review and attestation</li> <li>7. Annual statutory declaration for rules compliance</li> </ol>	<ol style="list-style-type: none"> <li>1. Annual TEO self-review submission and conversation <ul style="list-style-type: none"> <li>• up to 6 weeks for each process</li> <li>• one templated form (less than 6 pages)</li> </ul> </li> <li>2. Risk informed monitoring (including 3-yearly monitoring for degrees)</li> <li>3. Approval and accreditation processes <ul style="list-style-type: none"> <li>• simplified process for programmes with skill standards</li> <li>• less requests for information</li> </ul> </li> </ol>

### **EER categories become fast out-of-date ...**

16. The current EER process was introduced in 2009. The introduction of additional quality assurance monitoring activities, alongside the rapid evolution of teaching and learning, technology and the world of work, means we have found that the EER category rating no longer reflects an up-to-date view of TEO performance.
17. EER categories are derived from statements of confidence about a TEO's capability in self-assessment and education performance. They are intended to indicate the probable future quality of the TEO.
18. Currently, the vast majority of TEOs are Category 1 or 2. This means that NZQA is confident or highly confident in the TEO, suggesting learners and other stakeholders can be confident too. However, it is not uncommon for a Category 1 or 2 provider to run into performance issues, sometimes years after its most recent EER.
19. Where NZQA has concerns about aspects of a provider's performance, we take statutory action, for example imposing conditions on the provider's registration and/or accreditation to deliver a particular programme. Statutory actions are published on the NZQA website.
20. Of the three PTEs in the published list of actions as of 13 October 2025, all three are Category 1, two of which were awarded in 2024. Two PTEs, one Category 1 and one Category 2, have also recently and unexpectedly gone into liquidation [OC02111 refers: Fortnightly Report].
21. This shows that despite the intent for categories to help predict future quality, they cannot always do so. Better integration and real-time relevance of NZQA's quality assurance information are important drivers for change.

### **... and up-to-date information aids the TEO as much as the regulator(s)**

22. The proposed annual TEO self-review summary submission and conversation under iQAF aims to encourage continuous TEO good practice (i.e. self-review) while giving NZQA a touchpoint to discuss and understand each TEO's delivery. It is not an EER replacement; nor a 'mini EER' held at greater frequencies.
23. NZQA expects all TEOs to own their own quality and quality improvement by conducting ongoing self-reviews. TEOs then share their self-review outcomes and improvement plans with NZQA via a summary report. The summary report will be templated and succinct (no longer than 6 pages) to minimise compliance.
24. NZQA will have a conversation with TEOs after the submission of the summary report to discuss their improvement plan, based on the information (including quality assurance history) we hold about them.
25. Importantly, separate to the self-review process, NZQA will conduct its own independent monitoring to verify that the TEO is delivering robust qualifications and credentials.
26. We recently conducted a trial of the TEO self-review and conversation process with three Te Pūkenga business divisions and four PTEs. Initial feedback from the participants shows:
  - The process was relatively low effort, constructive, and helped consolidate existing work.
  - TEOs appreciated the opportunity to reflect, receive feedback for continuous improvement and preferred the annual touchpoints over four-year cycles.
27. Instead of categories, iQAF will provide a more up-to-date, 'compliant/non-compliant with NZQA rules' view of TEOs. We envisage greater use of our statutory notices to communicate programmes and organisations about which we are concerned.
28. This transparent approach ensures learners, the public and other agencies are aware of NZQA concerns about TEO compliance and education performance. Providers without non-compliance statements should be considered as meeting regulatory expectations, which should give learners the confidence they need and allow providers to brand themselves as such.<sup>2</sup>
29. We are also exploring if a summary form of a TEO's profile (primarily its quality assurance history) can be made available publicly to communicate TEO quality.
30. While there will not be a category to differentiate NZQA being 'confident' or 'highly confident', there are incentives for TEOs to be high performing under iQAF. A fundamental aspect of the new framework is a risk-informed, tailored approach to quality assurance. TEOs who consistently meet compliance and education performance expectations can expect a reduced monitoring load.

#### *Agency implementation*

31. TEC and Immigration New Zealand use EER categories in some of their processes (approving student visas, for example). We have been working closely with both agencies throughout 2025 and made recommendations regarding what information from NZQA could be relied upon for funding or immigration decision-making processes, instead of EER categories.

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<sup>2</sup> This is similar to the 'negative list' approach in international trade, for example. In iQAF, there is the presumption of quality by default, based on NZQA's approvals and accreditations and on-going monitoring, unless explicitly listed as non-compliant.

32. We will continue to support these agencies as they review and update relevant policies and processes to ensure their operations, TEOs and learners will not be adversely impacted during the transition. We understand that during initial implementation of the iQAF, in the short-term (through 2026), both agencies will continue to use the most recent EER rating ('grandparenting').
33. Through iQAF, NZQA will align better with practices in similar sectors inside and outside of New Zealand:
  - o Moving degree programme review and monitoring from annually to a three-year cycle better aligns with university practices.
34. [REDACTED]
35. We are also supporting the Ministry of Education as it proposes the approach to a review of the university quality assurance regulatory framework. As the agency with responsibility for overall stewardship of the New Zealand Qualifications and Credentials Framework (NZQCF), NZQA will be looking for further opportunities to support alignment and overall system coherence.

#### **Next steps**

36. The NZQA Board will decide whether to endorse the finalised design of iQAF and approve the updated Rules at its October meeting.
37. The Rules require Ministerial approval to be gazetted. If approved, the updated Rules will come into effect on 1 January 2026.
38. Pending NZQA Board approval, iQAF implementation will begin in January 2026. We plan to engage with TEOs and share information (e.g. our risk assessment approach, a system risk scan, and guidance) in the first half of 2026.
39. We expect to publish a schedule for our quality assurance activities by June, with activities such as annual self-review submission and conversation to commence from July. We will continue with monitoring that has already been scheduled.
40. We will continue to work closely with agencies (such as TEC and INZ) and the sector to plan for transition and implementation.
41. The implementation of iQAF, as well as its future reviews will be guided by NZQA's Regulatory Framework to ensure we continue to evolve and apply "right size, right time" regulation that balances our Rules for compliance with learner and TEO needs.

**Information Update: Learner’s view of provider quality under the integrated quality assurance framework (iQAF)**

<b>To:</b>	Hon Erica Stanford, Minister of Education		
<b>Cc:</b>	Hon Dr Shane Reti, Minister for Universities Hon Penny Simmonds, Minister for Vocational Education		
<b>Date:</b>	31 October 2025	<b>Priority:</b>	Medium
<b>Security Level:</b>	Unclassified	<b>OC No:</b>	OC02143
<b>Key Contact:</b>	Dr Grant Klinkum	<b>DDI:</b>	[REDACTED]
<b>Deputy Chief Executive:</b>	Emily Fabling	<b>DDI:</b>	[REDACTED]

**Purpose**

1. To provide you with information on what a quality provider means under iQAF and an international learner’s view of choosing a high-quality NZQA Approved Provider.

**Background**

2. At our agency meeting with you on 15 October 2025, we updated you on progress toward implementing our new integrated quality assurance framework (iQAF), and you asked for more information (a practical view) on the experience of the “end user” – specifically:

*How would a prospective international student in China know that they were selecting a high-quality provider, and would be likely approved for a visa?*

3. We have drawn up a learner journey (Appendix 1) and indicated what it means to be an NZQA Approved Provider and how this can influence a learner’s decision.
4. We consulted specifically with MBIE/INZ when developing the learner journey and have incorporated their feedback.

**NZQA Approved Providers**

5. NZQA quality assurance of the tertiary sector (excluding universities) is underpinned by NZQA Rules, made under Section 452 of the Education and Training Act 2020.
6. Under iQAF, the status of a ‘quality’ provider equates to being an **NZQA Approved Provider**.


7. An NZQA Approved Provider must be a wānanga, institute of technology or polytechnic (ITP), a registered private training establishment (PTE), or a former work-based learning division of the New Zealand Institute of Skills and Technology (temporarily located within an Industry Skills Board).
8. An NZQA Approved Provider must:
  - meet the criteria of the Quality Assurance Rules, which set out the fundamental requirements for being a quality tertiary education provider
  - meet approval and accreditation criteria for delivering, and maintaining approval and accreditation to deliver, qualifications and credentials listed on the New Zealand Qualifications and Credentials Framework (NZQCF)
  - demonstrate its ability to give effect to the *Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021* (the Code)
  - (for PTEs) meet the obligations specified in the Private Training Establishment Registration Rules.
9. The Code applies to all education providers who enrol international students (including schools), other students who come from overseas to study in New Zealand (eg. exchange students), domestic tertiary students or industry trainees or apprentices. An education provider *must* be an approved signatory to the Code before enrolling international students.

### **Monitoring Approved Providers**

10. iQAF is replacing NZQA's current Evaluative Quality Assurance Framework for TEOs (excluding universities), which was introduced in 2009 and includes as one of its monitoring activities a periodic (typically 4-yearly) review process.
11. A tailored, integrated, and risk-informed approach to monitoring under iQAF will provide a more up-to-date view of a TEO's performance than the current periodic review.
12. NZQA will monitor whether an Approved Provider is compliant with the NZQA Rules and the Code through monitoring. This means, in addition to checking that providers have met all administrative compliance requirements annually, we will determine the focus and frequency of monitoring based on a provider's:
  - performance history, i.e. any evidence-based compliance and/or performance issues arising out of NZQA or standard-setting body quality assurance activities
  - risk profile, i.e. the inherent risk signals with which the provider is associated, for example, providers who only enrol international learners, sudden increase/decrease in enrolment in a particular sector, providers with a large cohort of international learners from the same source country, or change of ownership.

### **Signalling concerns about Approved Providers**

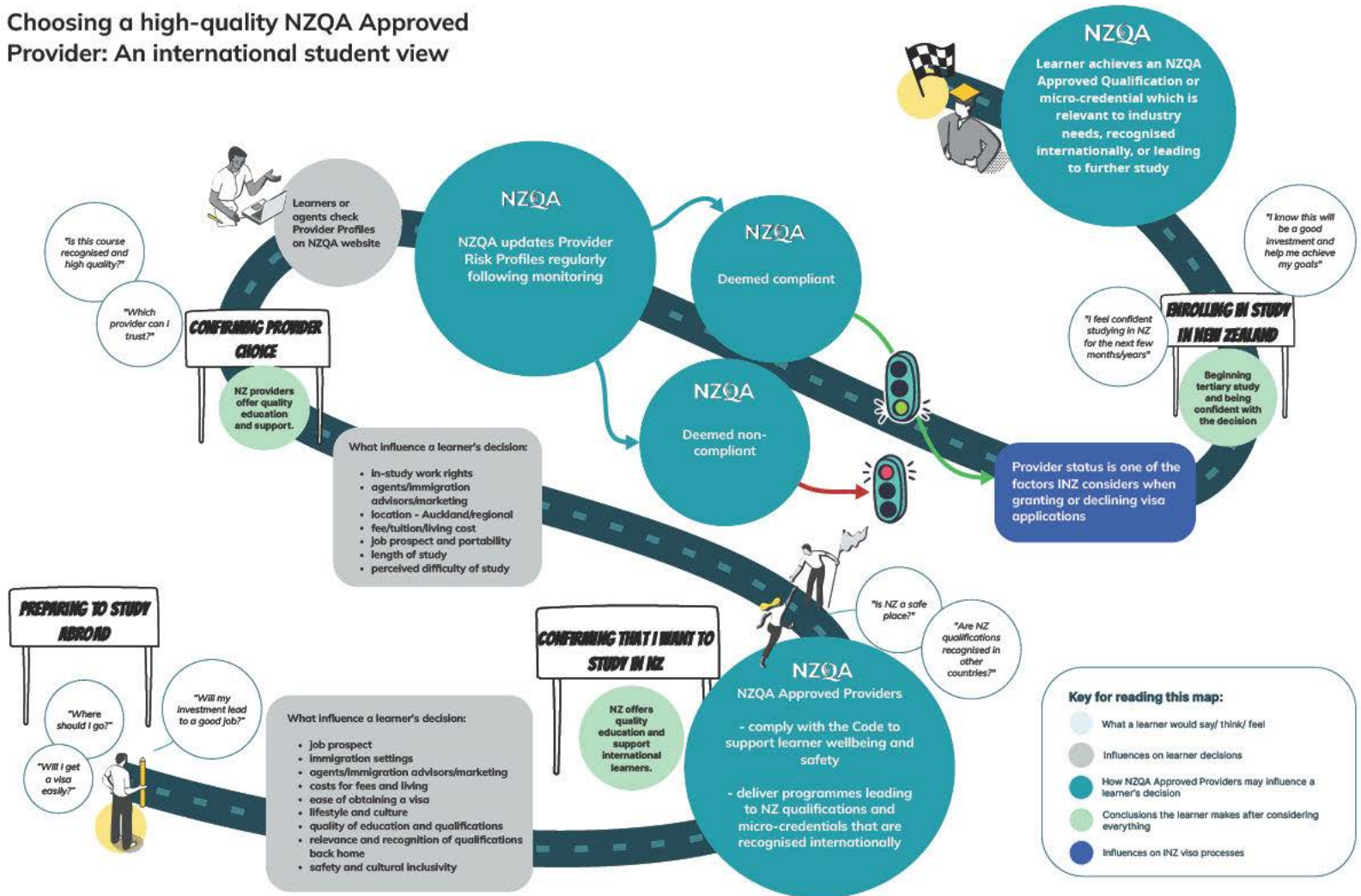
13. Through integrated monitoring under iQAF, we envisage greater use of our statutory actions (compliance notices and conditions) to identify providers who need to lift the quality of the education and/or support they provide to learners. These actions are publicly available on the NZQA website and updated regularly.

14. This transparent approach will ensure that learners, agencies, and any other stakeholders are aware of NZQA concerns about TEO compliance and education performance.
15. Rather than the four categories used under the current periodic EER system, providers awarding qualifications and/or micro-credentials on the NZQCF will be deemed one of two statuses:
  - **Compliant**, i.e. an Approved Provider with no concerns; or
  - **Non-compliant**, i.e. an Approved Provider with a compliance notice(s) or condition(s) on its NZQA approvals or accreditations which have reached an unacceptable level of material risk.
16. Providers with no compliance notices or conditions can be considered as meeting education quality regulatory expectations, allowing providers to brand themselves as such, and giving learners the confidence they need to enrol.
17. For non-compliant providers, the *materiality* of a compliance notice or condition on its approval or accreditation scope will vary depending on what proportion of the provider's education delivery is non-compliant.
18. NZQA will continue to work closely with MBIE/INZ (and other agencies/regulators) to clearly communicate the materiality of any education quality concerns using the "compliant / non-compliant" status and ensure that:
  - NZQA information about an Approved Provider supports immigration decision-making
  - business processes are aligned
  - relevant data and information can be shared, and
  - regulatory systems for providers are not duplicated.
19. The learner journey illustrates that the status of a Tertiary Education Organisation (TEO) as an NZQA Approved Provider is one of many factors that influence:
  - an international learner's decision to study in New Zealand
  - INZ's decision to grant or decline a visa application.
20. MBIE/INZ has also provided you on advice on options for improving immigration decision-making [MBIE REQ-0021910 refers]. Strong quality oversight is essential in the context of sustainable international education growth to maintain education quality for all learners, and immigration integrity. From INZ's perspective, previous EER categories of education quality have been used as a proxy for immigration decision-making, and INZ considers the new "Compliant / Not compliant" view of education quality may not offer insight into provider immigration risk profiles and decision-making.
21. 

## **Consultation**

22. NZQA has consulted with MBIE/INZ in developing the 'international student view' in Appendix 1. The Ministry of Education and TEC have been informed.

# Choosing a high-quality NZQA Approved Provider: An international student view



# Report: Implementing the integrated quality assurance framework (iQAF) and NZQA Rules

To:	Hon Erica Stanford, Minister of Education		
CC:	Hon Penny Simmonds, Minister for Vocational Education Hon Shane Reti, Minister for Universities		
Date:	9/12/2025	Deadline:	15/12/2025
Security Level:	Unclassified	Priority:	High
From:	Jann Marshall Pouwhakahaere Hāpai/ Acting Chief Executive	Phone:	04 463 3389 [REDACTED]
Key Contact:	Emily Fabling Pou Whakahaere Tuarua Whakaū Kounga/ Deputy Chief Executive Quality Assurance [REDACTED]	OC No:	OC02178

## Why are we sending this to you?

- The NZQA Board has endorsed the final design for the integrated quality assurance framework (iQAF). The Board Chair, acting under delegation from the Board, has approved Rules changes to support the implementation of iQAF, the Vocational Education and Training (VET) reforms and NZQA third-party fees.
- We are now seeking your approval of the Rules under Section 452(5) of the Education and Training Act 2020 (the Act).

## What action do we need, by when?

- We are seeking your approval of the 10 attached Rules.
- Should you approve the new Rules and changes to existing Rules, they must be presented to the House of Representatives under section 114 of the Legislation Act 2012 and are subject to disallowance by the House.

## Alignment with Government priorities

1. The redesign of the quality assurance framework for TEOs aligns with the redesign of the VET system and priorities set out in the new *Tertiary Education Strategy*.
2. The Government's priorities also include improving the quality of government regulation, ensuring that decisions by regulators are based on principles of good law-making and economic efficiency. Like other agencies, NZQA's focus is on lifting the performance of the regulatory systems we own, to meet our regulatory stewardship obligations.
3. NZQA recently worked with the Ministry for Regulation to review NZQA's overarching regulatory framework. We have established three regulatory principles to support NZQA to be a modern regulator – impact-led, anticipatory, and adaptable.
4. The integrated quality assurance framework (iQAF) reflects these regulatory principles.

## Background

5. As our review of the quality assurance framework for tertiary education organisations (TEOs) excluding universities has progressed over the last two years, we have provided you with advice on the redesign [OCs 1190, 1887, 2125, and 2143 refer].
6. The new integrated quality assurance framework (iQAF) will replace the current Evaluative Quality Assurance Framework (EQAF), introduced in 2009.
7. The iQAF aims to better integrate NZQA's regulatory activities, reduce compliance burden, and provide a more up-to-date view of TEO performance for NZQA as regulator. It also aims to improve efficiency across the sector, and overall tertiary education system performance through enhanced collaboration and information sharing with standard setting bodies, education agencies, and other regulatory bodies.
8. NZQA is the education quality regulator for around 400 TEOs across New Zealand, ranging from small Private Training Establishments (PTEs) to large conglomerates, Institutes of Technology and Polytechnics (ITPs), Wānanga, and Government Training Establishments (GTEs). We are responsible for monitoring the standard setting and quality assurance functions of vocational standard setting bodies. From January 2026 this will be the Industry Skills Boards (ISBs).
9. We also administer the Code of Practice for domestic and international learners (the Code) and take action to protect student wellbeing when necessary.
10. We began reviewing EQAF in 2022. The most recent public consultation, on finalising the design for iQAF and proposed Rules changes, took place between 18 August and 26 September 2025. Overall, iQAF is viewed by the sector as a significant modernisation of NZQA's quality assurance system, with many submitters welcoming the shift to a more tailored, risk-informed approach to quality assurance [OC02125 refers].
11. NZQA intends to begin the phased implementation of iQAF from January 2026, which aligns with the implementation of the VET reforms. 2026 will be a transition year.
12. We have engaged with the Ministry of Education (MoE), Tertiary Education Commission (TEC), Ministry of Business, Innovation and Employment (MBIE), and Immigration New Zealand (INZ) in preparing this advice.
13. MoE, TEC, and MBIE/INZ have confirmed they are supportive of iQAF implementation beginning, while NZQA continues to work with agencies and other stakeholders in 2026 to refine a three-tier system to describe a TEO's overall quality.
14. Implementation of iQAF and VET reforms require NZQA Rules to be updated. As the Minister responsible for NZQA, the Act requires that you approve and present these Rules to the House.

## Quality assurance with purpose

15. iQAF has **four quality assurance cornerstones** intended to support NZQA, TEOs, standard setting bodies, and other regulators to work together to ensure learners receive robust, credible and relevant qualifications and credentials:
- **Strong quality assurance foundations** based on NZQA Rules and guidance help TEOs get it right, first time;
  - **TEO ownership of quality and quality improvement** and regular meetings with NZQA means we know who we are regulating and how we can tailor our approach;
  - **Effective verification of TEO quality** using all our education performance monitoring, compliance and regulatory levers means we can act assertively where there is poor performance, and give high performers the space to innovate; and
  - **System assurance** ensures we step back, measure our impact, share with others what we've learned, and anticipate future opportunities and risks.

### Effective verification of quality | using our regulatory levers and sanctions

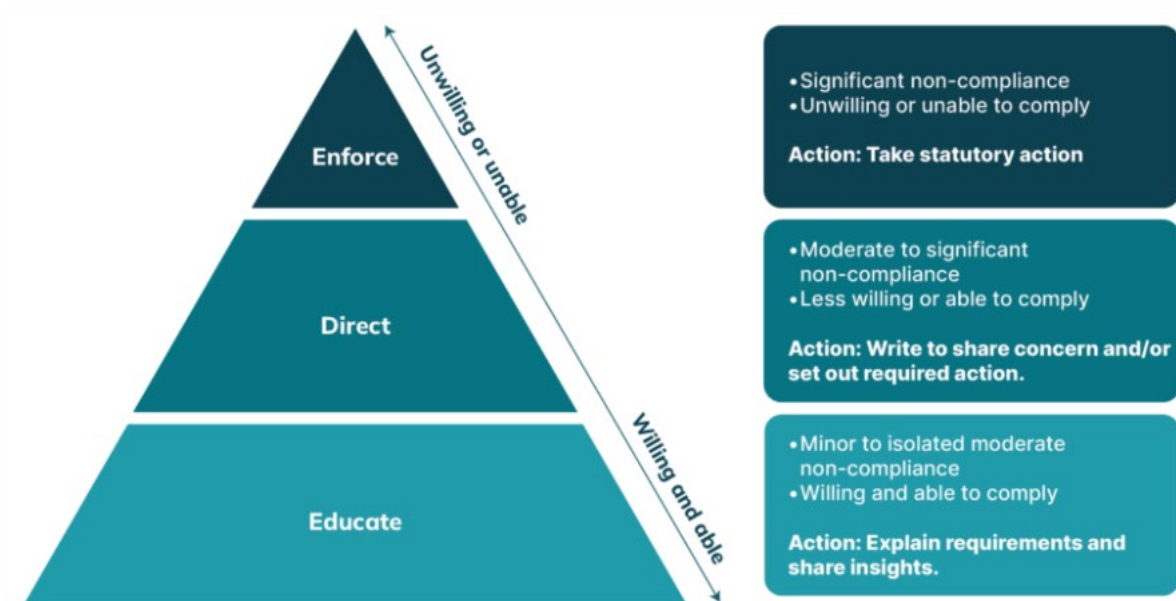
16. As the education quality regulator, NZQA employs a range of levers to ensure quality and compliance. We use both a proactive, educational approach to minimise the risk of provider non-compliance, as well as a graduated intervention approach for managing issues when they arise.

*NZQA sets quality standards and supports provider capability through monitoring*

17. The iQAF sets us up for success, using a proactive and preventative approach through various levers to encourage compliance and improvement:
- **Setting Standards:** Establishing and communicating clear standards and criteria for accreditation, programme approval, and consent to assess through our Rules
  - **Monitoring:** Scheduled monitoring of provider performance and programme delivery, against approval and accreditation criteria set out in Rules, including assessment of student outcomes.
  - **Risk Management:** Identifying and managing risks across the sector and with individual providers to prevent issues from escalating, sharing risk profiles with other regulators and agencies to inform their decision-making.
  - **Education and information:** Providing information, resources, and guidance to providers to help them understand and meet quality standards and our Rules, working collaboratively to address concerns before formal sanctions are necessary.
  - **Formal reviews and assessments:** Conducting quality assurance assessments, and other targeted reviews or compliance visits to check the effectiveness of a provider's processes.
  - **Action plans/quality improvement plans:** Where we identify issues with a provider's programme delivery, we require an action plan to address the issues within a specific timeframe. We actively manage action plans alongside the provider to ensure the actions are effective and where they are not, we use our statutory powers.

*NZQA intervenes when there is non-compliance*

18. Where our monitoring activities identify non-compliance with our Rules, we take a graduated approach to managing the issues that is proportionate to the severity of the non-compliance. Mitigating the impact of non-compliance is managed at three levels:



19. Our monitoring activities aim to identify issues early on so they can be resolved at the lowest level possible to minimise the impact on learners. Where we identify issues with a provider’s programme delivery, in the first instance we require an action plan to address the issues within a specific timeframe. Where the issues are more significant or repeated in nature, we have powers under the Education and Training Act 2020 to take statutory action which includes:
- issuing a compliance notice that requires a provider to take specific action within a set timeframe;
  - imposing conditions on a provider’s accreditation which requires the provider to make improvements within a longer timeframe and can also set restrictions such as a stop on new enrolments.
20. Where no improvements occur despite conditions being in place, or there are particularly severe issues identified from the start, NZQA may withdraw the accreditation of a provider for a particular programme or suite of programmes. Statutory actions taken are listed on the [NZQA website](#) to inform learners and other stakeholders.

*Integrating regulatory levers will provide a more reliable and current measure of TEO quality*

21. External Evaluation and Review (EER) is one of NZQA’s current regulatory levers, introduced as part of Evaluative Quality Assurance Framework in 2009. EERs typically occur every four years and result in each TEO being assigned one of four categories, derived from NZQA statements of confidence about a TEO’s capability in self-assessment and education performance. Categories were intended to indicate the probable future quality of the TEO.
22. Since EER process began, NZQA has overlaid additional routine and risk-based monitoring activities in the pursuit of quality. As well as EER, NZQA now:
- monitors TEO sub-degree programmes to determine if assessment and moderation practices are valid;
  - requires providers with programmes leading to vocational qualifications to participate in ‘Assuring Consistency’ reviews, designed to ensure that graduates have the necessary skills and knowledge; and
  - monitors how providers are giving effect to the Code.
23. As a result, we have found that:

- our monitoring and regulatory activities have become complicated, multi-layered, and need to be more integrated; and
  - the EER category rating no longer reflects an up-to-date view of TEO performance.
24. Currently, the vast majority of TEOs are Category 1 or 2. This means that NZQA is highly confident or confident in the TEO, suggesting learners and other stakeholders can be confident too. However, it is not uncommon for a Category 1 or 2 provider to run into performance issues.
  25. Of the four PTEs in the published list of statutory actions as of 20 November 2025, three are Category 1, two of which were awarded in 2024. The remaining PTE is Category 2. In addition, two PTEs, one Category 1 and one Category 2, have recently and unexpectedly gone into liquidation.
  26. This shows that despite the intent for categories to help predict future quality, they cannot always do so. Better integration and real-time relevance of NZQA's regulatory levers are important drivers for change.

### Provider compliance and interaction with other regulatory settings and agencies

27. Under iQAF, the key mechanism for verifying the quality of a provider's education delivery is the independent monitoring by NZQA of the teaching, learning, assessment, and learner support provided by each TEO. All TEOs will be measured against criteria set out in NZQA Rules, which are supplemented by Tertiary Quality Indicators published on the NZQA website.
28. Combined with rigorous front-end/approval processes, and the TEO's ongoing self-review, NZQA monitoring will ensure the TEO's teaching and assessment *practice* reflects the *promise*.
29. Instead of multi-year EER categories, iQAF will provide a more up-to-date view of TEO quality. We envisage there will be greater use of our statutory notices, and publication of these to communicate to learners, the public and other agencies which TEOs or programmes we are most concerned about, and what actions are required.
30. Outcomes from NZQA quality assurance of TEOs inform other agencies' processes. TEC and INZ have used EER categories to support investment and visa approval decisions – for example:
  - TEC requires additional information from Category 3 providers (including how the TEO is responding to NZQA regarding its Category); and Category 4 providers are not funded. TEC processes do not significantly differentiate between Categories 1 and 2, but the category is considered as part of TEC's holistic assessment of a provider for funding.
  - INZ will not grant visas for students seeking to enrol in a Category 4 provider; and differentiates between Category 1 and 2 for in-study work rights for students studying English Language only.
31. We have worked with TEC and MBIE/INZ throughout 2025 to discuss, in lieu of EER categories, the TEO risk and education performance information that NZQA will share to ensure funding and immigration decisions are supported.
32. We recently shared with agencies detailed views of the regulatory levers that will be in place for iQAF including:
  - what a TEO risk and performance profile will look like;
  - the TEO self-review process;
  - types of compliance and education performance monitoring;
  - the characteristics of compliant versus non-compliant TEOs; and
  - how NZQA will manage poor TEO performance.

33. MBIE/INZ indicated that the detailed views NZQA provided were helpful to understand how TEOs would be assessed as meeting education quality requirements and, while INZ had operational questions and comments that can be further worked through<sup>1</sup>, overall, there were no major concerns.

34.

[REDACTED]

35. As well as investment decision-making, TEC uses NZQA's quality assurance outcomes as an input into annual auditing process - specifically, to help inform the scope of TEO audits and whether TEOs should be prioritised in the audit cycle.

36. TEC has confirmed its preference for NZQA to implement a three-tier system to differentiate TEO overall performance, as this approach provides a more nuanced indicator of provider quality. TEC considers that a simple compliant/non-compliant model creates a high threshold for non-compliance, which can mask variations in performance and limit insights for TEC's investment decisions. TEC also suggests that that a three-tier system would be useful to stakeholders such as learners and their whānau.

37. Other implementation matters raised by TEC relate to the timing and format of TEO performance information to be shared, the coverage of NZQA monitoring activities (including for different types of TEO), and opportunities to minimise perceived compliance/duplication between agencies.

38. TEC also recommends that agencies commit to a joint date to review progress on iQAF implementation in 2026.

39. MoE has also expressed its preference for NZQA to implement a three-tier system, noting it supports the twin goals of enabling the important role of NZQA assuring providers are compliant with the NZQA Rules, and enabling the tertiary sector and key stakeholders, especially students, to have a good understanding of provider quality.

40. To ensure iQAF delivers on its proposed benefits and meets other regulator needs, NZQA will work with agencies in 2026 to implement a three-tier system to describe a TEO's overall quality.

41. MoE, TEC, and MBIE/INZ have confirmed they are supportive of iQAF implementation beginning while this work continues. In 2026, NZQA will continue to engage with INZ, TEC, and other regulators with a shared interest in TEOs' education performance (e.g. Civil Aviation Authority, Nursing Council etc.) to ensure the implementation of the iQAF meets their needs. We will also work with the new Industry Skills Boards (ISBs) once established, to ensure that our respective quality assurance activities are complementary, not duplicated.

42. In addition to finalising the three-tier quality system, a key focus for this ongoing collaboration will be to optimise the level of detail and frequency of sharing of TEO risk and education performance information. We have discussed with both INZ and TEC short- and longer-term mechanisms to ensure this happens including:

- fortnightly/monthly 'operational' monitoring/risk workshops and less frequent 'governance' meetings to review progress and monitor overall regulatory settings;
- succinct templates to profile non-compliant TEOs, shared at key intervals;

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1

[REDACTED]

- clear escalation frameworks and formal referral processes (in either/multiple directions); and
- updating Memoranda of Understanding to set out how we will collaborate and complement each other's regulatory responsibilities and approaches to managing risk and performance, and to minimise compliance for high-performing TEOs.

## Rules changes required

43. To enable the implementation of iQAF from January 2026, NZQA has developed new Rules and updated some existing Rules (refer Annex 1).
44. The Rules set out the criteria to support education providers to deliver high-quality teaching, learning and assessment, so that learners achieve robust, relevant, and credible qualifications and credentials.
45. Once the Rules are in place, NZQA will update corresponding guidance for TEOs, including tertiary quality indicators, to show examples of what good practice can look like in tertiary education.
46. We have also developed or updated Rules to:
  - support the VET reforms by prescribing the quality assurance requirements for ISBs;
  - enable the introduction of a simpler, fairer fees system for TEOs [OC02171 refers].
47. The Rules follow the specifications and new template for secondary legislation issued by the Parliamentary Counsel Office (PCO) in June 2025.

## New Rules

48. The proposed *Quality Assurance of Tertiary Education Providers Rules 2026* replace the existing *Quality Assurance (including EER) Rules 2022*. The proposed new rules:
  - Require all providers to have a quality management system. This is taken from the current *Private Training Establishment Registration Rules 2025*.
  - Require providers to complete an annual self-review, report and improvement plan, meet with NZQA and address improvements, and participate in NZQA monitoring.
  - Set out some additional requirements for work-based training to verify the provider has effective arrangements for ensuring the quality of the training and assessment undertaken in workplaces.
  - Consolidate the sub-contracting rules from the *Programme Approval, Recognition, and Accreditation Rules 2025*, *Micro-credential Approval and Accreditation Rules 2025* and *Consent to Assess Against Standards on the Directory of Assessment and Skill Standards Rules 2022* into this rule set.
  - Prescribe how providers can refer to their EER rating.
49. Once the design of the three-tier quality system has been refined with agencies and the sector in 2026, we will seek an update to the Quality Assurance Rules to accommodate the new system.
50. The *Private Training Establishment Rules 2026* bring together the *Private Training Establishment Registration Rules 2025*, *PTE Enrolment and Academic Records Rules 2022* and *Annual Fee Rules 2022* into a single rule set. There is a proposed change to require Financial Statements biennially by default, unless requested annually. The deposit for new PTE applications has been increased to \$1500 from \$750.
51. The proposed *ISB Prescribed Quality Assurance and Annual Fee Rules 2026* set out the arrangements ISBs must have, and require them to conduct self-reviews, provide a report to NZQA, participate in monitoring, and address improvements. Each ISB will pay an annual fee to NZQA based on the number of hours NZQA spends monitoring the ISB in

relation to the prescribed quality assurance requirements. Over time, once we have sufficient data from ISB monitoring, we will establish a fixed fee in Rules.

52. During a transitional period, ISBs will also manage work-based training currently overseen by Te Pūkenga. This includes paying credit reporting fees for standards and qualifications completions. The transition will begin in 2026 and continue until the end of 2027, after which ISBs will focus solely on their core standard-setting and quality assurance responsibilities.

## Changes to existing rules

53. A change to the *Programme Approval, Recognition and Accreditation Rules 2026* means programmes leading to qualifications consisting entirely of skill standards will not need to meet certain criteria, therefore streamlining approval processes. This supports the policy intent that vocational qualification itself contains a level of detail that does not need to be repeated in the programme approval process.
54. In the *Qualification and Micro-credential Listing Rules 2026*, the period for ongoing review of a qualification or micro-credential is changed from no longer than 5 years for qualifications and 3 years for micro-credentials to “a period acceptable to NZQA”. Similarly, the limit of 5 years on the review period for a standard is removed in the *Directory of Assessment and Skill Standards Listing and Operational Rules 2026*. These changes recognise that qualification and micro-credential developers are well-placed to determine review periods, while also allowing NZQA to ensure that only relevant and useful qualifications are listed on the NZQCF.
55. The amount under which a PTE is exempt from having a trust arrangement for student fees is raised to \$1000 (from \$500) in the *Student Funds Trust Deposit Exemption Rules 2026*. This is to adjust for inflation.
56. Throughout the Rule sets, a range of other consequential matters are addressed including:
  - references to EER and Assuring Consistency activities have been removed.
  - terminology relating to VET changes has been updated to refer to ISBs, standard setting bodies and Institutes of Technology and Polytechnics, as appropriate.
57. Some Rules are removed where no longer relevant.

## Authority to approve the Rules

58. NZQA may make Rules under section 452 of the Education and Training Act 2020. The Rules require the approval of the NZQA Board and the Minister, as defined in section 10(1) of the Act. As Minister of Education, you hold the Prime Minister’s delegation for section 452(5) of the Act, under which the Rules are made.
59. On 8 December 2025, the NZQA Board Chair, acting under delegation from the Board, approved, signed and dated the proposed changes to the NZQA Rules attached as Annex 1. NZQA now seeks your approval under section 452(5) of the Act, which involves signing and dating each Rule set.
60. Once you have approved the NZQA Rules, they must be presented to the House of Representatives under section 114 of the Legislation Act 2012 and are subject to disallowance by the House.
61. The Rules are dated to come into force on 19 January 2026. This requires the Rules to be signed and presented to the House by **18 December 2025**.

## Risks

62. TEC notes the general risk that the introduction of iQAF comes during a period of significant change in the sector, referring to the VET reforms, fiscal environment, an

increased number of new PTEs, and time needed to optimise operational processes as examples. TEC and MoE have also expressed concerns about whether some TEOs will have the necessary capability and maturity to carry out robust self-reviews.

63. NZQA acknowledges broader changes in the sector and has allowed for this in the design of iQAF and the Rules. We consider it would be a higher risk to delay the introduction of iQAF. The review of NZQA's quality assurance framework has been underway for several years, and changes have been well-signalled and supported by TEOs who would like to see government agencies using specific risk and performance data to inform a co-ordinated regulatory response.
64. A second risk is that the more integrated, real-time approach to monitoring TEO education performance under NZQA's updated regulatory framework, may not meet TEC and INZ needs. In particular, the original proposal to move from the four-point rating system under the EQAF's EER to two broad categories under iQAF (compliant versus non-compliant).
65. NZQA understands that agencies need to have confidence in our assessment of TEO quality. We are confident that integration of our monitoring activities will lead to more proactive identification and mitigation of risk, and a more up-to-date view of the TEO's performance than the status quo, meaning our contribution to other agency processes has more validity and reliability. We also appreciate that agencies would prefer a three-tier overall quality system, and we have agreed to work with agencies to deliver that system.
66. NZQA will also support TEOs to deliver high-quality education through guidance, insights reports, system risk scans, thematic reviews, and regular touchpoints with TEOs about what they are doing to improve. We will publish the graduated risk and mitigation framework referred to earlier.
67. Transitioning from a quality assurance framework put in place over 15 years ago will take time. Clear communication with TEOs and ongoing collaboration with agencies, standard setting bodies, and overseas partners through 2026 and beyond will ensure that our framework has credibility and a positive impact on learner success.

## Next Steps

68. NZQA has developed a Communications Plan that includes:
  - publishing a summary of submissions on the NZQA website
  - advising the sector of finalised iQAF design and associated Rules changes
  - communicating the changes to all TEOs (except universities) including information on self-review and NZQA monitoring activities for 2026
  - key messages about the consultation feedback and final decisions and back-pocket Q&A.
69. NZQA's Quality Assurance Division has made structural changes to organise functions in line with the iQAF model, which stands up from February 2026.
70. The implementation of iQAF, as well as its future reviews will be guided by NZQA's overarching Regulatory Framework to ensure we continue to evolve and apply "right size, right time" regulation that balances our Rules with learner and TEO needs.

# Annexes

The following are annexed to this paper:

Annex 1: NZQA Rules for approval

## Recommended Actions

The NZQA recommends you:

- a. **note** that NZQA consulted on finalising the design for iQAF and proposed Rules changes from 18 August and 26 September 2025.

**Noted**

- b. **note** that the NZQA Board has endorsed the final design and implementation of iQAF, and that the Board Chair, acting under delegation from the Board, approved the updated NZQA Rules on 8 December 2025.

**Noted**

- c. **note** inter-agency support, comments and suggestions for the implementation of iQAF, including the commitment to continue working together on a three-tier quality system through the first year of implementation.

**Noted**

- d. **approve** the Rule changes pursuant to section 452(5) of the Education and Training Act 2020, by signing, dating and entering the location, in the spaces provided for each attached Rule set.

**Approved / Not approved**

- e. **note** that, should you approve the changes to NZQA Rules, they must be presented to the House of Representatives under section 114 of the Legislation Act 2012 and are subject to disallowance by the House.

**Noted**

### Proactive Release:

- f. **Agree** that this report is proactively released as part of the next publication of documents.

**Agree / Disagree**



Jann Marshall  
Pouwhakahaere Hāpai /Acting Chief  
Executive

Hon Erica Stanford  
**Minister of Education**

  9  /  12  /  2025  

  /  /

## Annex 1: NZQA Rules for approval

- i. Qualification and Micro-credential Listing and Operational Rules 2026
- ii. Directory of Assessment and Skill Standards Listing and Operational Rules 2026
- iii. Programme Approval, Recognition and Accreditation Rules 2026
- iv. Micro-credential Approval and Accreditation Rules 2026
- v. Consent to Assess Against Standards on the Directory of Assessment and Skill Standards Rules 2026
- vi. Private Training Establishment Rules 2026
- vii. Quality Assurance of Tertiary Education Providers Rules 2026
- viii. ISB Prescribed Quality Assurance and Annual Fee Rules 2026
- ix. Offshore Programme Delivery Rules 2026
- x. Student Funds Trust Deposit Exemption Rules 2026