Rules consultation

Summary of submissions

2022

Rules consultation submissions

NZQA consulted on proposed rule changes between 12 September and 24 October 2022.

This document provides a summary of the feedback from the 114 submissions made to NZQA as part of this consultation.

In the summary we share what we have heard from submitters on proposals relating to rules changes, skill standards and New Zealand Programmes.

114
Unique survey submissions

Submissions by topic

The 2022 rules consultation asked respondents to provide input on seven key topics. Below is a summary of the number of comments received for each topic.

Micro-credential approval and accreditation received the most input, alongside 'other changes,' followed by skill standards. Offshore programme delivery received the least input, with only 16 comments.
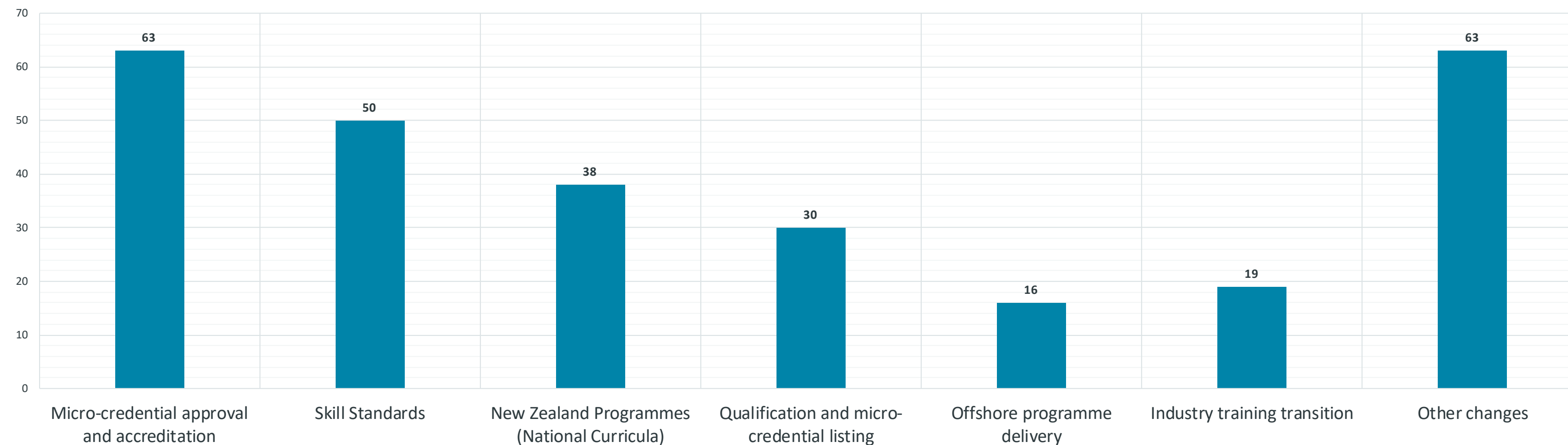
Submissions by respondent type

Respondents were asked to indicate whether they were making a submission as an individual, or on behalf of others, such as an organisation.

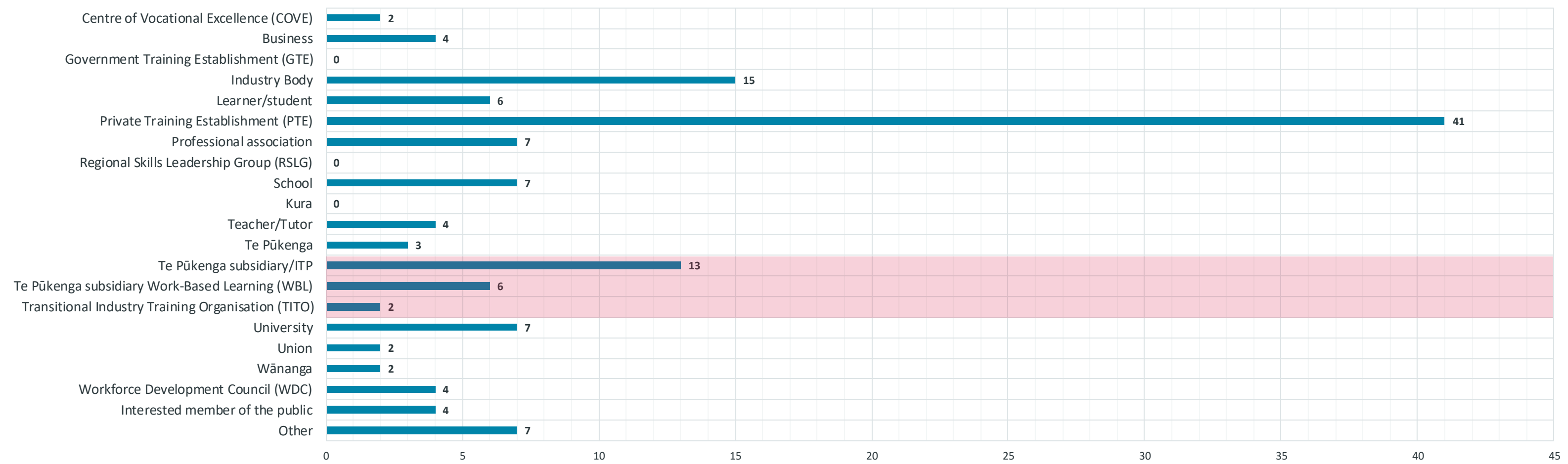70% of the submissions received were from individuals, with the remaining 30% of submissions made on behalf of an organisation.

30%
(34 submissions)

70%
(80 submissions)

■ Submission as an individual   ■ Submission on behalf of an organisation
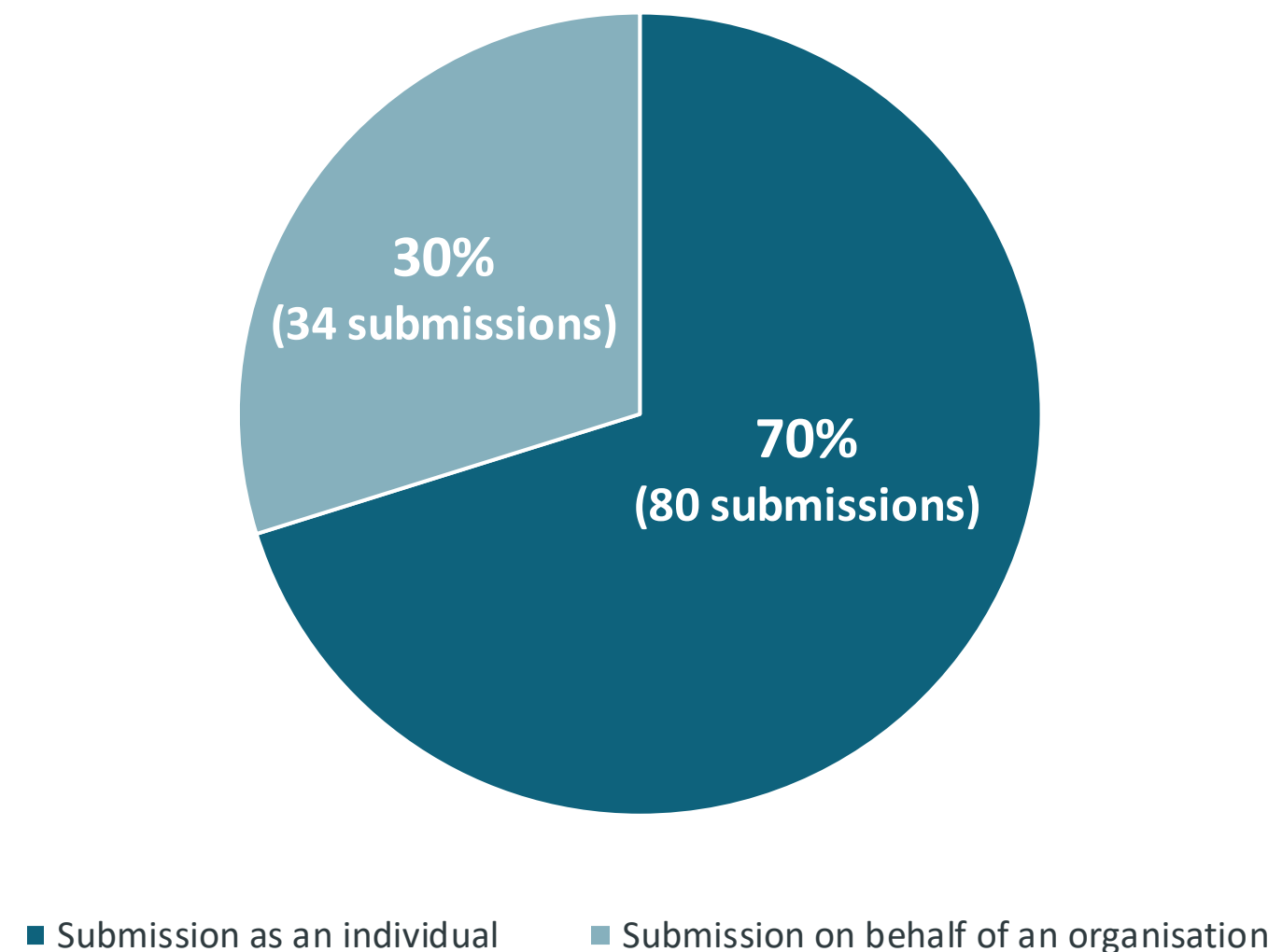
Submissions by sector association

Submissions were received from a range of respondents with varied associations with the education sector.

30% were associated with Private Training Establishments (PTEs), 16% with Te Pūkenga or Te Pūkenga subsidiaries (highlighted in pink below), and 11% had associations with industry bodies.

Sector association	Count
Centre of Vocational Excellence (COVE)	2
Business	4
Government Training Establishment (GTE)	0
Industry Body	15
Learner/student	6
Private Training Establishment (PTE)	41
Professional association	7
Regional Skills Leadership Group (RSLG)	0
School	7
Kura	0
Teacher/Tutor	4
Te Pūkenga	3
Te Pūkenga subsidiary/ITP	13
Te Pūkenga subsidiary Work-Based Learning (WBL)	6
Transitional Industry Training Organisation (TITO)	2
University	7
Union	2
Wānanga	2
Workforce Development Council (WDC)	4
Interested member of the public	4
Other	7

Submissions by group

Respondents were asked to indicate which of the following groups or range of groups their organisation works with.
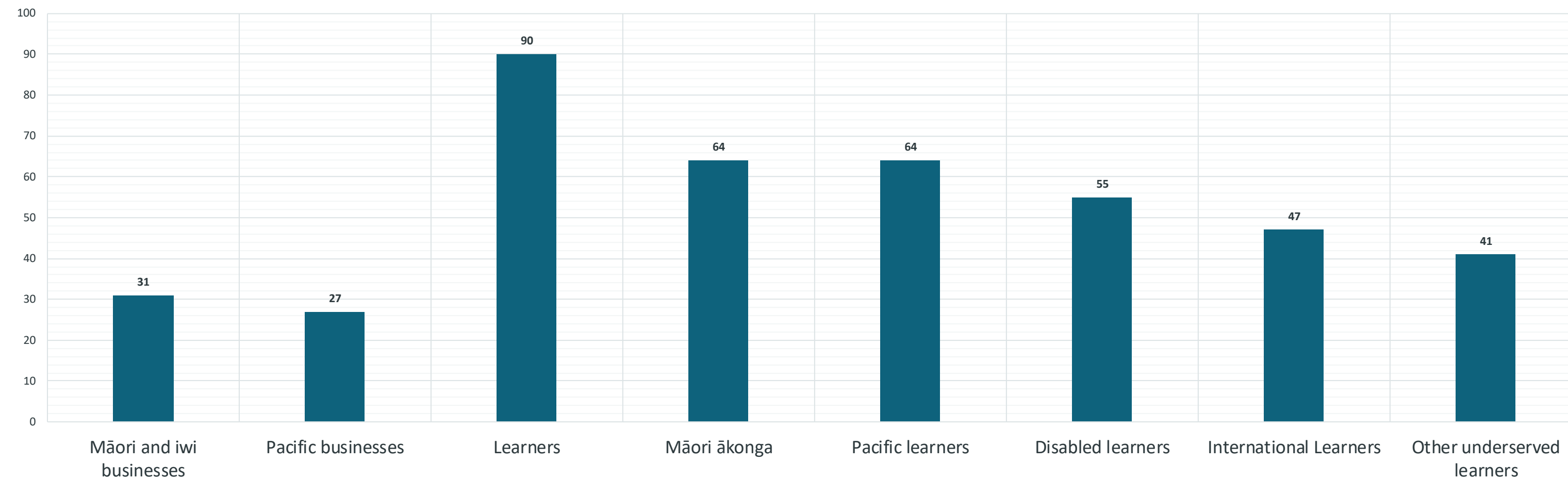
Micro-credential approval and accreditation

Submissions on micro-credential approval and accreditation can be categorised into the following key topics:

- Ownership and accreditation

- Micro-credential 'need' criterion

- Approval process

- Non-approved micro-credentials or courses

- Review period

- Consistency

- Other

Micro-credential approval and accreditation

Ownership and accreditation
- There is some uncertainty regarding the concept of 'ownership' in relation to micro-credentials, and a desire to ensure that micro-credential developers are consulted before accreditation is granted to other providers.
- There is demand for a single-system approach to micro-credential development and accreditation across schools, universities, and other providers.
- Private Training Establishments (PTEs) want the ability to develop micro-credentials in niche areas, especially where there is no WDC coverage.

Micro-credential 'need' criterion
- Respondents indicated that the criterion of 'need' in the development of micro-credentials should be inclusive of learner need.
- Submissions highlighted that there may be a need for micro-credentials which are not vocational or skill standards-based, and therefore, the 'need' criterion should not dismiss the importance of interest-based and life-long learning.
- There is demand for 'need' to be considered at a range of levels, including regional, local and/or international need, in the approval process.

Approval process
- There is demand for a quick and easy application process without duplication of effort.
- There is a need to clarify the role of WDCs in the approval process.
- Specific feedback on the approval criteria for micro-credentials, including language requirements, consultation with regulatory authorities, and recognition of prior learning.

Micro-credential approval and accreditation

Non-approved micro-credentials or courses
- Some respondents highlighted that there may be a need for credentials which do not fit NZQA's criteria, such as informal, non-approved, or non-assessed courses.

Review period
- There were a range of responses regarding the review period for micro-credentials, with some advocating for a 1-3 year review period, others suggesting 3-5 years, and some wanted the flexibility to have a 6-month continuous review cycle.

Consistency
- Respondents asked for clarity on how consistency will be maintained for micro-credentials offered by multiple providers.
- Some respondents mentioned that WDCs should be involved in the ongoing monitoring of micro-credentials.
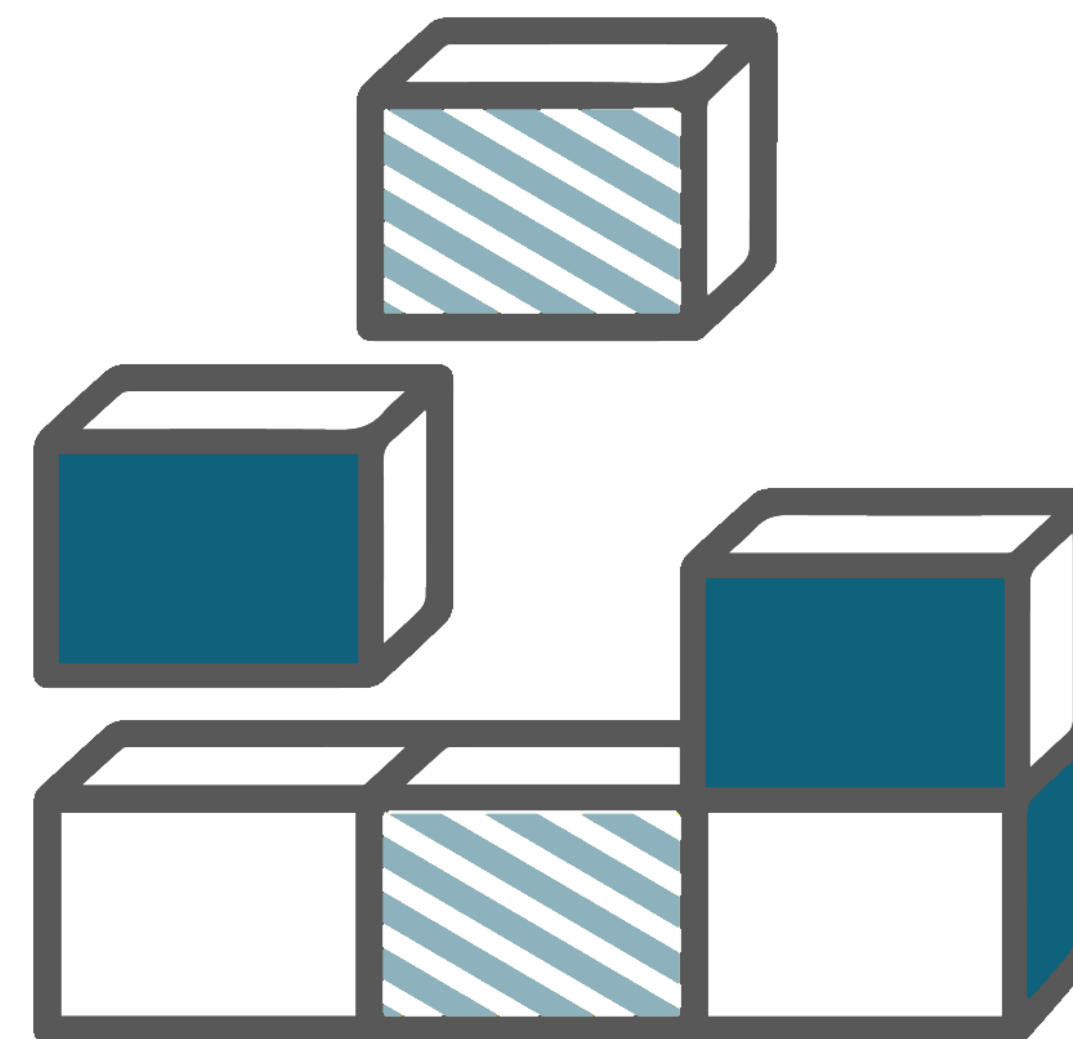
Other
- There were questions about how stacking will work.
- More information was requested regarding the process of making changes to micro-credentials.

Skill standards

Submissions on skill standards can be categorised into the following key topics:

- Listing
- Design and development process
- Detailed design suggestions
- Use
- Assessment
- Guidance

Skill standards

Listing
- Some respondents supported using pre-requisites, others disagreed. Those who supported did so as they can prevent students from attempting to study something that they do not have the appropriate prior knowledge for, whilst those who disagreed see them as a barrier to learning.
- Suggestions to include language(s) used in the listing details.

Design and development process
- There is demand for regulators to be consulted in the development of skill standards.
- There are challenges about the breadth of skill standards– they need to be detailed enough that specialised skills are covered, but in some cases, broad enough to cover several relevant skills.
- There were several comments on credit size, most of which requested that there be no minimum credit value.
- It was suggested that skill standards be designed so that they are suitable for a variety of delivery modes and the learning needs of diverse ākonga.

Detailed design suggestions
- Integrate knowledge, skills, and behaviours.
- Embed and integrate human skills, work capable skills (where appropriate), and general skills (e.g. numeracy, literacy, critical thinking, research).
- Include references to relevant legislation.
- Identify the skill stream within a wider industry where appropriate.
- Identify which industries or potential jobs the skill standard is linked to (career/employment outcomes).
- Identify which components are for guidance and which ones will be moderated.
- Change the placement of grades to have 'Excellence' on far left, Achieved' on far right, and include wording for 'Not Achieved.'
- Include resubmission criteria to standardise how providers approach resubmissions.
- There may be times when content should be specified (absolute) rather than indicative.
- Indicative content could include sample or example activities.

Skill standards

Use

We received questions about how skill standards will be used in qualifications, including:

- How credits and learning outcomes will align.
- When skill standards must be used.
- How much of a qualification can be made up of standards.
- How skill standards will be introduced and how the transition from unit standards to skill standards will occur, including updating regulations where unit standards are currently required.
- Whether skill standards can be used alongside, not instead of, unit standards.
- How skill standards will be used in schools.

Assessment

- Respondents asked for clarification on the purpose of "assessment criteria" and "assessment information."
- It was suggested that moderation guidelines be written alongside skill standards, to provide education organisations with the clarity they need when designing assessment tools, and for quality assurance purposes.

Guidance

In general, more guidance was advocated:

- On grades, skill progression, where skill standards fit with other parts of the system (qualifications, credentials, national curricula/NZ programmes), and their application in different delivery modes.
- On how ngā kaupapa will be incorporated into standards.
- On how mātauranga Māori will be embedded in a standard.

New Zealand Programmes (National Curricula)

Submissions on New Zealand Programmes (National Curricula) can be categorised into the following key topics:

- Naming
- Criteria for the recognition of New Zealand Programmes
- Suitability
- Use
- Development

New Zealand Programmes (National Curricula)

Naming
- Respondents were asked to propose an alternative name to "New Zealand Programme" if they did not support it.
- Of the 114 responses, only nine offered alternative suggestions, including:
    - "Te Moana-nui-o-kiwa" (incorporating all waka and including wider whānau).
    - 'Aotearoa' Programme or 'Aotearoa New Zealand' Curricula/Programme.
    - 'Standardised' or 'WDC' Curricula/Programme.
    - 'National' or 'Tertiary' Curricula/Programme.

Criteria for recognition of New Zealand Programmes

We received feedback about the criteria for recognising a New Zealand programme, including:
- The need to clarify the roles of the WDCs and NZQA in this process, and what collaborative development will look like.
- Embedding the level of the programme in the title.
- Not prescribing assessment requirements, resource requirements, admission requirements, and transition arrangements, but instead allowing these to be open for the provider to decide how to deliver, to allow flexibility and to ensure learner needs are met.
- Including the names of all WDCs who were consulted with in the development of the programme.
- Providing evidence of consultation.
- Requiring CoVE support.
- Requiring New Zealand Programmes based on skill standards to incorporate soft skills, literacy and numeracy, and theory.
- Requiring that where a NZ programme is developed, it replaces all other programmes of study.

New Zealand Programmes (National Curricula)

Suitability
- There was a suggestion that there are already sufficient mechanisms in the system that support uniformity, without the need to introduce New Zealand Programmes.
- Respondents hoped that there would be room for regional specialisation.
- Some submitters thought that if a New Zealand Programme were required for consistency purposes, it should be compulsory.
- Submissions expressed concern that a New Zealand Programme did not fit with the flexible development and learning they needed when training their workforce.

Use
- Some submissions did not support making skill standards mandatory in New Zealand Programmes.
- It was suggested that parameters be set on the use of skill standards to enable soft skills, literacy and numeracy, theory etc. to be built into the programme.
- Some submitters were unclear whether New Zealand Programmes could be made mandatory.

Development
- Collaborative development was supported. One submitter suggested that New Zealand Programmes should be endorsed by stakeholders.

Qualification and micro-credential listing

Submissions on qualification and micro-credential listing included:

Level 7 Diplomas

In response to the proposal to apply the rules and processes for level 5 and 6 diplomas to level 7 diplomas, feedback included the following concerns:

- The distinctiveness, flexibility in design, and 'ownership' of a level 7 diploma would be lost if it became a New Zealand diploma and able to be delivered by other providers.
- The cost of changing a level 7 diploma into a New Zealand diploma and the subsequent cost of changing the programme(s) leading to the qualification.
- It was suggested that existing level 7 diplomas should not change, but any new diplomas at level 7 could be developed as New Zealand diplomas.

Other

- A suggestion was made that all qualifications and micro-credentials should be listed with both an English and a Te Reo title.
- Some respondents want the graduate outcomes(s) to be included in the listing details for qualifications and micro-credentials, and to list the WDCs who have approved them. There was a desire for WDCs to be part of the approval process for qualifications.
- It was also suggested that all qualifications and micro-credentials should be reported to NZQA and put on the learner's New Zealand Record of Achievement within 3-months of completion.

Offshore programme delivery

Submissions on offshore programme delivery included:

Clarity required

Respondents asked for clarity on:

- The parameters around language of delivery and how much of a programme can be in another language, without it being included on the award.
- How a partner will be assessed/considered for suitability, and how work placements will be assessed.
- How NZQA will ensure offshore and onshore delivery is aligned, including work placements, and how Te Tiriti obligations will be met in offshore delivery situations.
- Whether international students onshore, who return home for emergencies, can continue their studies online (temporarily or to completion) in situations where the programme is not approved for offshore delivery.
- The role of providers when teaching offshore and delivering host country qualifications through a partnership arrangement.
- Whether offshore work placements for a programme taught in New Zealand are considered to be offshore delivery.

Industry training transition

Submissions on industry training transition included:

Clarity required
Most of the feedback we received about industry training was about the need for clarity on the transition.
- There needs to be a pragmatic approach to transition and skill standards need to be developed as soon as possible, to help bridge the transition.
- Some respondents said they require a longer transition period.
- Respondents also expressed that industry training needs to be flexible to suit the employer and the trainee's unique situations and expertise. A standard programme may not be suitable.
- Some respondents expressed the desire to keep programmes of industry training, and not transition to programmes of learning at all.

Other changes

Other submissions included:

Programme Approval, Recognition, and Accreditation Rules
- A concern was raised that not accepting "at home" tests would mean that students who do not have in-person tests available in their country will miss out. This is especially the case for students from the Pacific Islands. Respondents also expressed the need for a longer lead-in time for the removal of these tests, as some students will be sitting tests currently, so that they can submit their applications.
- There was also concern about requiring evidence of English proficiency for work-based learning, where the learner is an international student. This is also seen as a barrier to learning.
- Respondents raised questions about the academic record retention requirements across three sets of rules. There were varying opinions on what should be kept by who and for how long.
- One respondent noted that accreditation criterion 2 specifies "academic staff", which may not be appropriate for vocational or work-based programmes.
- One respondent requested the removal of the requirement for WDCs to endorse Type 2 changes.
- We received feedback that providers should work with industry and professional bodies in setting their programme requirements.
- There is also demand for the standard setting body to be involved in the consent to assess process.
- There is a desire to ensure that the processes for granting consent to assess as part of accreditation are streamlined and avoid duplication.

Quality Assurance (EER) Rules
- We received feedback about the record keeping requirements in the Quality Assurance (EER) Rules. Respondents said the rules should be same for all providers, and that the assessment records definition should not include language courses. It was also suggested that the retention of attendance records should align with TEC requirements.

NZQA is working through the consultation feedback, to inform the final updated rules.

The updated rules are expected to come into effect for the beginning of 2023 and will be available on our website.