

General comments

Ako Aotearoa strongly supports the overall direction of change proposed in this document. We believe that an NZQF structured in this way will allow for a considerable enhancement of tertiary education provision in New Zealand at pre-degree level. It has the potential to provide for a much more integrated, flexible and future-focussed approach to tertiary education and assessment. This is long overdue.

The proposals are premised on the assumption that a reduction in proliferation of qualifications will lead to economies of scale in programme development and design. We believe that, although untested, this is a reasonable assumption. While there are considerable opportunities for the enhancement of tertiary education in New Zealand contained within these proposals, there are also some significant risks which must be managed proactively.

1. Residual ambiguity about partnership requirements for qualifications development

We are not sure that who develops qualifications in the future is fully clarified in this consultation paper. It is critical that providers have a role in this. This is acknowledged in some parts of the consultation document (e.g. p 6), but is not in other areas where it is implied that the standard setting bodies will have considerable autonomy (p16). It is fundamentally important to recognise that providers are key stakeholders in this process.

We note that some commentators have raised the issue of NZQA pre-empting ownership rights to existing qualifications. We do not believe this to be overly problematic for several reasons:

- Where alternative qualifications are identified as unnecessary, duplication of an existing national qualification, there is by definition, little if any IP of value within the qualifications themselves
- Where local qualifications are sufficiently unique under the new rules to be registered on the New Framework, there is a meaningful trade-off to be made between the national promotion of that qualification and the loss of any IP.
- Most importantly, irrespective of the points mentioned above, we would content that the overwhelming bulk of any intellectual property (IP) resides in the programmes leading to the qualification rather than the qualification itself.

However a test of reasonableness will undoubtedly apply here. If standard setting bodies do not consult effectively with existing providers and ensure they are not unduly disadvantaged by this change, then challenges to the process will inevitably arise.

2. The market for existing programmes

Further to this, the consultation paper recommends establishing a market for existing programmes of study (p 15). It is very unclear whether it is anticipated that this market will be purposefully established and regulated and who by, or whether it will be simply allowed to develop. If the latter, does it require regulation and at what level? To what extent does this become the responsibility of the quality assurance bodies? Clearly the protection of the reputation of the programme owner is a significant regulatory driver in its own right. Clearly more work needs to be done in this area.

3. The absolute need for effective and publicly credible moderation systems across programmes

Maintaining standards for a qualification with diverse programme pathways to that qualification is a very significant area of risk and the reputation and value of the new framework will rise or fall against this. Although mentioned in the consultation document, it is not clear how this risk will be addressed or by whom. Development of prescriptions (which must allow for flexibility of delivery approaches) will be necessary but not sufficient. This will require much stronger moderation processes that are capable of being operationalised across different assessment approaches. This is largely untested territory. Developing exemplar moderation approaches must therefore be a priority. We believe that NZQA needs to invest urgently in building capability here.

4. Retention of legacy terminology

We would question the distinction being made in this consultation paper between “programmes of study” and “training pathways”. An effective workplace training programme (which hopefully includes educative elements) is no less a programme of study than one provided by a provider. An important measure of the success of this reforms will be demonstrable equality of status. This will come from demonstrated fitness for purpose.

If qualifications and their graduate outcomes are to be genuinely determined by the future needs of employers, this raises the question of whether ITOs need to be confined to offering pathways defined only by unit standards based assessment. The framework as proposed obviates any *a priori* need to limit ITOs working with unit standards only. There is surely an opportunity here for ITOs to expand on the existing competency model within the work place, for example by working with providers to develop achievement standards, and / or do away with them entirely if other approaches to establishing academic standards can be established. The decision whether or not to retain units standards needs to be made on the nature of the skills, knowledge and aptitudes required by the qualification outcomes and prescription, the needs of the learners and the requirements of employers.

5. Expansion of the proposed framework into degree level

A critical test of the framework will be on the ease with which learners are able to transfer to and from different programmes as they work towards a qualification. Another is the enhancement of opportunities to transfer from one qualification to another at a higher level, including degree level study. While the targeted review is limited to levels 1-6, these proposals are clearly inclusive of degree level study (e.g. pp 6). We look forward to seeing these aspects operationalised in order to facilitate nationally consistent credit recognition processes across the tertiary sector.

6. Risks around variable credit values for qualifications

The opportunity to have variable credits (within a prescribed range) for a qualification is again an area of risk which needs to be managed carefully. The determining factor here should be entirely dependent on whether the graduate outcomes for some strands of a qualification clearly require additional study.

7. The status of short awards on the new framework

We would suggest that the revised approach to qualifications described here offers an opportunity to rethink the requirements for short awards. If there are clear employment benefits from a programme of study of less than 40 credits, then this is surely a meaningful credential. Applying the broad principles of this reform, it is difficult to see why this should not be an approved qualification on the framework. If 20 credits leads to the development of a coherent and widely used skill set that leads to enhanced employability and meaningful productivity gains in an industry, then the argument for recognising that credit set as a qualification is a strong one.

8. The need to ensure the operation of the new framework is not distorted by the mechanics of funding

Connected with this, a key risk to qualification development is that the process and outcome is unduly constrained by mechanistic funding requirements. The purpose of framework is to determine value and relationships between qualifications: the operation of the framework should not, therefore, be constrained by the requirements of funding delivery. Note that this is not to be confused with the obligations of all development teams that the qualification they are proposing is genuinely value for money and not carrying unnecessarily inflated credit values.

9. The requirement for a future focus

As a statement of general principle, it is critical that the framework allows all qualifications to be future focused – both in respect of likely developments in the work-place, but also for continuing educational opportunities for the individuals who seek to gain them. Equally, it is important to remember that however well designed, qualifications are not substitutes or proxies for *curriculum vitae*: it is unrealistic to assume that a qualification should provide evidence of all the skills, knowledge and attributes employers look for: qualification outcome should be set realistically. Judgments need to be made about what it is reasonable to expect providers and workplace experience to teach and what it is reasonable to expect learners to learn.

Responses to specific consultation questions

- Q1. Describing qualifications in terms of outcomes is simply formal recognition of established good practice. It places the frame firmly on what it to be learned, rather than what is to be taught. It provides a meaningful opportunity for qualifications to be described in terms of capabilities as well as competencies. Separation of the qualification from the programme of study is then a logical consequence of this, recognizing that there is more than one way to promote effective learning.

- Q2. There are no particular issues in having a single set of design rules, providing their flexibility is not unnecessarily constrained by over-tight prescriptions. A single set of design rules is essential to a unified, coherent qualifications framework.
- Q3. The proposed design rules seem to be entirely fit for purpose at a conceptual level. They will need ongoing review as they are operationalised, ideally with NZQA and other QABs providing an ongoing commentary on how issues are resolved so that precedents and solutions in one discipline area can inform others.
- Q4. Our experience with the stock-take of qualifications for tertiary teachers suggests that NZSCED classifications are not necessarily unambiguous, nor do they meet the criteria of being readily understood. A much preferred approach is to develop detailed learning outcomes, although these need to be as precise as possible and self-standing: the level of detail provided in a unit standard for example, is inappropriate for an outcome statement that is accessible to the general public.
- Q5 – Q9 No additional comment
- Q10. A key barrier to stakeholder involvement will be developing the conceptual understandings underpinning this document. It is important not to under-estimate the need to educate stakeholders about the differences between a qualification and a programme of study: this has often been a difficult message to get through to policy groups and tertiary managers.
- Q11. No additional comment
- Q12. Operationally, there will be significant issues about who takes the lead on this in the future. NZQA and other QABs may need to offer a facilitation role in some areas, especially at diploma level and where there is no defined SSB.

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For the Ako Aotearoa Board.
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