



NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

Targeted Review of
the Qualifications System
Focussing on certificate and diploma levels

December 2009

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INTRODUCTION

In September 2009 a consultation paper, *Targeted review of the qualifications system focussing on certificate and diploma levels*, was released to the tertiary education sector for consultation. The consultation paper was produced by the New Zealand Qualifications Authority (NZQA) with input from the Ministry of Education.

The consultation paper provided the results of a review of the New Zealand qualifications system. It also proposed a package of seven major changes to be made to the qualifications system to address the issues surfaced in the review. As a package, the proposed changes were intended to simplify and strengthen the qualifications system, making the system easier for learners and employers to understand and use.

The consultation on the proposed changes ran for six weeks, the deadline for submissions being 10 November 2009. 65 formal submissions were received from across the tertiary education sector, including; tertiary education organisations, industry training organisations and representative bodies (see Appendix A for a list of submitters). As part of the consultation activities on the proposed changes NZQA also facilitated three regional meetings in Wellington, Christchurch and Auckland. The views of representatives at these meetings, and others held over the consultation period, were recorded and every attempt has been made to represent them here.

The feedback from the submissions and other forums is outlined in this paper. This feedback will be taken into consideration in recommendations to be made to the Minister for Tertiary Education.

What is the targeted review?

As a strategically significant component of New Zealand's economy and society, it is important that the qualifications system is credible and robust. Learners, employers and industry require a high quality education system that clearly conveys the knowledge and skills gained in achieving a qualification, in order to make informed decisions about future study and employment. The Government and the public expect tertiary education in New Zealand to be flexible, internationally recognised and responsive to the needs of learners and employers.

The targeted review of the qualifications system highlights issues that the Government is seeking to resolve. NZQA identified ways to resolve the problem of too many similar qualifications (duplication) that increase the number of qualifications in the system (proliferation), but do not increase choice for learners.

As a result of this, the Government signalled an active period of change to simplify the qualification system for the learner, industry and providers. The proposed changes indicated a possible direction for this change.

SUMMARY OF KEY CONSULTATION FINDINGS

In total 65 submissions on the proposed changes to the qualifications system were received. Of these, 55 were submitted by representatives of an organisation. Nine of the ten personal responses received were from individuals or groups of individuals currently working in an education organisation.

Overall, submitters welcomed the review of the qualifications system and agreed with the problem statement as presented. Many also acknowledged the importance of a credible and robust New Zealand qualifications system, for learners and employers here and overseas. The package of changes was supported, although some submitters considered aspects of the system important to them were not addressed.

Broad themes

While many submitters requested further information and consultation opportunities on the changes, some broad themes emerged:

Cost and compliance

- Concerns were raised with any additional cost and compliance of new activities, such as mandatory reviews and pre-development assessment for qualifications, not being offset by reductions elsewhere.

Self-assessment and external evaluation and review

- Many submitters, particularly polytechnics, questioned how self-assessment and external evaluation and review would sit within the context of mandatory reviews. A number of these submitters were also concerned that the high trust and high accountability environment may be compromised by mandatory reviews.
- Some submitters also stated that the proposed activities already occur within their organisations.

Qualification developers' roles

- Comments from various respondents focussed on what the roles of standard setting bodies and providers should be. Some of these focussed on how other qualification developers could change their processes, but there was also feedback on what submitters could do within their own organisations to implement the changes.

Current capability and capacity of NZQA, and other agencies, to achieve the goals of the change package

- There was a general lack of confidence expressed in the ability of NZQA and other agencies to achieve the goals set out, within a tight fiscal environment.

Other government agencies

- The role of the Tertiary Education Commission, and funding mechanisms, in creating an environment for duplication and proliferation were raised throughout the submissions. A number of submitters called for more effective alignment with the Tertiary Education Commission, as well as other government agencies, where quality assurance and funding were concerned.

DETAILED SUMMARY OF CONSULTATION FINDINGS

NZQA sought sector responses through an invitation to complete a consultation questionnaire (Appendix B). The questionnaire was a blend of questions requiring responses along a Likert¹ scale with additional open-ended questions for depth discussion. It contained 37 questions, ten of which used a Likert scale.

The majority of submitters used the questionnaire, while others elected to discuss sections of most relevance to them without using the questionnaire structure. 45 out of the 65 submitters attempted the Likert scale questions in the survey questionnaire. The descriptive statistical data from completed questionnaires represents 61.5% of submissions. For analysis of all other submissions responses to each change were coded as 'support', 'unclear or not stated' and 'do not support'. This information was combined with the Likert data to provide an indication of the level of support for the changes. The combined data will be referred to in this summary. A separate overview of the Likert data is available in Appendix C.

The comments made during the regional meetings held in Wellington, Christchurch and Auckland are also reflected in this summary. In total, 223 people registered to attend the regional meetings in October and November. The Wellington meeting (30 October) received 63 registrations overall. This included 29 private training establishments, nine industry training organisations², three polytechnics, two wānanga and two government training establishments. Slightly fewer registrations were received for the Christchurch meeting (3 November). Out of the 47 registrations there were 33 private training establishments, one industry training organisation, three polytechnics and two universities represented. The Auckland meeting (5 November) had the most registrations, with 113 overall. Of this, 82 private training establishments, five industry training organisations, one polytechnic and one university were registered. The feedback received at these meetings was also reflected in submissions, particularly those from private training establishments and their peak bodies.

Further responses

An overview of further responses that surfaced through the consultation is summarised below:

- The place of self-assessment and external evaluation and review was raised throughout the submissions, particularly in response to changes three and six. Feedback on these changes was in general agreement that ongoing reviews for relevance and industry support for qualification development was important. However, not all submitters agreed to these activities being mandated or validated externally.
- A large number of respondents indicated that many of the problems identified by NZQA have resulted from policies, guidelines and processes established by

¹ Respondents to a Likert scale are provided with options to indicate the extent to which they agree or disagree with a statement.

² Some organisations sent two or more representatives and total registrations depict this. However, each organisation is counted only once where total numbers of institutions or industry training organisations registered is provided.

NZQA. Some indicated that because of this, NZQA should be expected to contribute to the costs of the changes.

- There was concern, mostly within the private training establishment sector, that a focus on collaborative qualification design would disempower individual qualification developers or smaller groups of providers.
- Many submissions were concerned with the short time frames and requested further consultation on changes as these are progressed. A number of submitters also offered their organisational expertise on working parties to help develop the changes.

Some respondents indicated that the targeted review had not addressed other specific areas of concern with the qualifications system and the consultation paper. These included:

- The development and use of unit standards. The feedback presented here included claims of exclusionary behaviour by standard setting bodies when developing and monitoring the use of unit standards. Conversely, some standard setting bodies indicated their frustration with ongoing development of local qualifications, because the course approval process appears easier and faster for providers.
- The distinction between ‘programme of study’ and ‘qualification’ is not sufficiently clear in the consultation paper.

The table below provides an overview on the number of submissions:

Table 1: Total submissions by organisation type

Organisation type	Organisation	Personal	Running total
Government training establishment	1		1
Industry training organisation	10	1	11
Māori private training establishment	1	1	2
Polytechnic	11	3	14
Private training establishment	15	4	19
University	3		3
Wānanga	1		1
Government agency	1		1
Representative body	3		3
Peak body	9		9
Other		1	1
Grand Total	55	10	65

Strong themes have been discussed under each change, with examples from the submissions where they provide depth. Further information on combined data responses by organisation type is available in Appendix D.

Change one: Develop a unified New Zealand Qualifications Framework

Support for change one was strong across the education sector, with 80% of respondents indicating their acceptance of the overall aims of the change.

Table 2: Response count for change one

Strongly support change one	Support change one	Neutral or unclear	Somewhat support change one	Do not support change one
34%	46%	14%	4.5%	1.5%
22	30	9	3	1

Submissions on change one fell into two viewpoints:

1. those that saw the change as a self-evident good
2. those that saw the change within the context of the issues of the current system.

Those that viewed the change as an end-point tended to “strongly support” the change:

Greater clarity for employers as to what skills potential employees have [and a] simpler system for students wishing to achieve qualifications. (Submission 1)

We support a unified NZQF because the fundamentals of a framework-based approach to credits and levels, and the description of outcomes met by the learner is retained, while there is more flexibility for developers in terms of course-based, standards-based and hybridised approaches to qualifications development and delivery to more comfortably co-exist in a single system. (Submission 22)

The current system is cumbersome and anything that works towards simplification will be in the best interests of all. (Submission 49)

The New Zealand Qualifications Framework would bring both the National Qualifications Framework and the New Zealand Register of Quality Assured Qualifications into one single framework.

Three submitters interpreted this as the National Qualifications Framework becoming the New Zealand Qualifications Framework. They subsequently concluded that the New Zealand Qualifications Framework should be administered by the same rules, where only National qualifications can be registered. This is not the intention of the New Zealand Qualifications Framework. Four submitters also stated that the current differences between National and provider-developed qualifications need to be maintained. Most of those submitters reasoned that the addition of New Zealand qualifications would only add further confusion.

Five submissions drew attention to the targeted nature of the review, focussing on levels 1 to 6, as problematic. These submissions were focussed on a perception that universities or levels 7 to 10 qualifications would not be included on the New Zealand Qualifications Framework (Submissions 7, 44, 46, 49 and 52). Submission 44 also stated that the New Zealand Qualifications Framework suggested that industry

training organisations would be excluded from developing qualifications above level 6. It is intended that all quality assured qualifications at levels 1 to 10 will populate the New Zealand Qualifications Framework, including university qualifications.

Other recurrent issues were:

- The needs of qualification developers being important considerations, alongside other users such as learners, employers and industry.
- Consistency required in classifications used for the system (i.e. NZSCED) and definitions of qualification types (National, New Zealand and provider).
- There is insufficient detail provided in the paper on how credit transfer, credit recognition and recognition of prior learning would be assessed. However, some respondents viewed the New Zealand Qualifications Framework as capable of facilitating this better.
- Questioning the capability of the quality assurance bodies to support this new system.

The respondents that viewed the change within the context of the issues of the current system presented a range of other considerations. These included concern about gaps in research on the possible proliferation of unit standards, as well as their development and use. These issues were further elaborated on in responses to change two and are discussed on pages 12-13. Some other areas of concern focussed on current issues of clarity of qualification descriptions (including levels and credit values), terminology (i.e. course and qualification) and classification systems (i.e. NZSCED). Four submissions (5, 52, 53 and 64) stated that all educational agencies should unify their qualifications databases and other related information systems.

Getting this right will take time especially if the idea is to bring all agencies into a single architecture. (Submission 62)

There are a number of interpretations of how the new framework would work. For many submitters, in order for change one to be a success, the language of it must be internationally recognised with a single classification system applied across the system. This was especially important for learners:

For the average NZ learner there is currently confusion between the NQF/ QA/ Provider/ Local/ National qualifications – it would be good if the categories could be simplified. Distinctions should be clear and easy to understand. (Submission 18)

Two respondents in support of change one stated that this change would mean their provider-developed qualifications would have equal standing with National qualifications (Submission 51), and increased credibility (Submission 8). However, other respondents indicated that the New Zealand qualifications framework would be an extension of the National Qualifications Framework, and as a result, National qualifications should be re-named New Zealand qualifications. There were additional concerns raised in connection with this. Without the segmented system, qualifications such as National, New Zealand and provider-developed, one respondent indicated that this lack of differentiation may prove more confusing to learners.

Concerns were also raised regarding the poor promotion of the Register and *KiwiQuals*, and whether this would be an ongoing issue for the New Zealand Qualifications Framework.

[t]here still needs to be a clear distinction between the New Zealand (National) qualifications and provider/local qualifications and what this means on a local, national, and international basis. (Submission 18)

The key qualifications on the Framework are nationally recognised National qualifications. If the NQF is going to change to the NZQF, then National qualifications should change to NZ qualifications. (Submission 26)

We question however, the need for New Zealand qualifications... Retaining the New Zealand qualification leaves the door open for continued confusion as to what constitutes a national programme. (Submission 61)

These responses indicate that there is further work required on naming conventions and also on developing what the purpose of the framework will be. The intention of the new framework is to remove the barriers between qualification types (National and local). However, it is evident that some respondents still prefer a separation between qualification types when considering what the system will be.

Additional comments

There were a further two Likert scale questions in the consultation questionnaire. Question three was the first of these, and it asked “*How easy would it be for learners, employers and people from overseas to understand the proposed New Zealand Qualifications Framework, compared with the present New Zealand Register of Quality Assured Qualifications and National Qualifications Framework?*”

From the 40 respondents, 25 indicated this change would make it “very easy” or “easy” for learners, employers and people from overseas to understand the qualifications system, compared with the present New Zealand Register of Quality Assured Qualifications and the National Qualifications Framework. 14 respondents indicated that this change would be “no different” for these users.

Table 3: Response count for question three

Very easy	Easy	No different	Difficult	Very difficult
7.5%	55%	35%	2.5%	0%
3	22	14	1	0

Additionally, question four asked, “*To what extent would the proposed New Zealand Qualifications Framework make the relationships between qualifications clearer, compared with the current framework?*”

From the 40 respondents, 27 indicated this change would make relationships between qualifications “very clear” or “clear”, compared with the current system. 13 respondents indicated that this change would be “no different” for these users.

Table 4: Response count for question four

Very clear	Clear	No different	Unclear	Very unclear
12.5%	55%	32.5%	0%	0%
5	22	13	0	0

A number of submissions queried how relationships between qualifications would be measured or assessed:

The extent to which the proposed framework will make the relationships between qualifications clearer will depend on how the definitions of the qualifications are presented and on the ways in which the information can be compared. (Submission 52)

This comment connects with others made on the importance of qualification descriptors and classification systems for ensuring that the New Zealand Qualifications Framework is clear and easy to use.

Change two: Require the use of existing quality-assured qualifications and change the design rules for National (standards-based) and New Zealand (course-based) qualifications to allow for more inclusion of local components

Approximately 52% of submissions were supportive of change two, while 20% of respondents indicated they “somewhat support” change two. Of the 26 respondents that indicated “support” for change two, four were industry training organisations, four were polytechnics and five were private training establishments. Eight peak and representative bodies were also in support. Most of these respondents viewed this method of reducing duplication and proliferation positively.

Table 5: Response count for change two

Strongly support change two	Support change two	Neutral or unclear	Somewhat support change two	Do not support change two
12%	40%	23%	20%	4.5% ³
8	26	15	13	3

Recurrent issues were:

- Ownership of qualifications, including issues of intellectual property and competition.
- Issues of qualification types and distinctiveness, including the terms National, New Zealand and local, but also certificate, diploma and degree.
- Concerns that the value of National qualifications would be reduced if, within an outcomes-based qualification system, a New Zealand or provider-developed qualification may gain similar status.
- Concerns that existing quality assured qualifications on the New Zealand Qualifications Framework would be prioritised over the development of new qualifications.
- Whether or not local components will be quality assured, and what body would have responsibility for this.

The support for change two was varied. Many of the submissions focused on what was considered two distinct parts for this change; that is, (1) requiring the use of existing qualifications and (2) changing the design rules for qualifications. A considerable proportion of submissions selected ‘neutral’ or their response was ‘unclear’. Similarly, 20% indicated they ‘somewhat support’ change two. While the majority of submissions supported the change (52%), many were based on differing interpretations of what this change would mean for them and other parts of the sector.

Of the 10 respondents that indicated “somewhat support” for change two, one was an industry training organisation, three were polytechnics, one was a private training establishment and two were universities. One of these respondents stated that any design changes should affect existing qualifications (Submission 11), while another stated there should be more mechanisms to remove existing qualifications from the system (Submission 27). Another was concerned learners could be confused with

³ Some of the figures do not add up to 100 percent due to rounding.

‘local components’, which may not improve comparability between similar qualifications.

Two respondents gave their support to *requiring the use of existing quality assured qualifications* only, and not *changing the design rules for qualifications*. Both of them were standard setting bodies and noted their concern that National qualifications could not remain consistent and transferable with local content (Submissions 26 and 44).

Qualification ownership was a strong consideration for many submitters in response to this change. Some stated that this change posed legal and accountability issues. In connection with this, some submitters focussed on a possible issue that existing qualifications would be privileged over new development. This led to questions of how the potential innovations or improvements of a new qualification would be assessed, particularly if it could supersede a similar existing qualification.

The proposal to change the design rules of qualifications did not receive as much discussion. However, a number of submitters commented on the terms for qualifications, such as National, New Zealand and local. These terms were described as being unhelpful for considerations of a unified qualifications system. This was also reflected in comments on change one. However, there was a significant minority that were concerned that many smaller qualification developers and providers may not have the means or resources to develop nationally-recognised qualifications.

Other discussion on change two focussed on what local components would look like. Question 10 of the consultation questionnaire suggested that local components could be set within either a percentage range or a principles-based approach between standard setting bodies and qualification developers. 28 submissions were in favour of a set-percentage, such as 30 percent, while 10 were in support of a principles-based approach. One submitter indicated that a clear description of what the principles would be was essential before a decision could be made on either option (Submission 42). However, there were six submissions that indicated that an application of both would be effective, for example:

We suggest both with the guiding principles being a test that will assist the development need for local content that can be up to a maximum. Our experience shows local content is only a 20-30 percent component of skills. We would also note there is a risk if the authority gets [too] prescriptive on rules for structure of quals – the classic trades are ossified and impractical and there remains a tendency to favour these one size fits all conceptual models – this is a serious error as the more dynamic sectors will be stifled by the less innovative and change oriented. (Submission 40)

In further discussion of the local component other issues were raised, including questions of how local components would be quality assured. Some respondents were concerned with the possibility that standard setting bodies may take this role, while others welcomed this.

Change three: Require mandatory periodic reviews of qualifications to determine whether they are still fit-for-purpose

Approximately 72% of respondents supported change three. Most submissions were in agreement that qualification and programme reviews were important to the success of an organisation. However, not all agreed that these reviews should be mandatory or bound by consequences (i.e. removal from the New Zealand Qualifications Framework). This question was characterised by answers that fell into two ranges:

1. those respondents that supported the change because they already conducted qualification and programme reviews
2. those respondents that did not support the change because they did not see value in mandating a process they already conducted.

Table 6: Response count for change three

Strongly support change three	Support change three	Neutral or unclear	Somewhat support change three	Do not support change three
18%	44.5%	17%	7.5%	12%
12	29	11	5	8

Recurrent issues overall were:

- Concerns over what place self-assessment and external evaluation and review will have in meeting the requirements of the reviews.
- In addition to the above, questions on whether the reviews will require external validation.
- Costs of any additional activities.

Three polytechnics, two private training establishments, one industry training organisation and one peak body indicated they “do not support” change three.

The comments from respondents that selected “somewhat support” change three were concerned with the prospect of an added compliance burden that may mitigate the principle of ongoing self-assessment (Submissions 12, 16 and 35). However, one respondent noted that self-assessment would drive qualification developers to work better with local industries, to ensure relevance:

...with the implementation of SA [and] EER, providers will be expected to work even harder with their local industries to ensure that there is a match between ‘needs’ and outcomes’. (Submission 28)

One submitter stated that pre-development assessment and subsequent qualification approval should be adequate. This submitter viewed the fit-for-purpose reviews as “...unnecessary duplication – one round of industry consultation and endorsement should suffice for the application process” (Submission 21). However, it is intended that reviews should occur throughout the life-cycle of a qualification. Indicating concern that quality assurance bodies would have responsibility for validating the reviews, one respondent stated that:

In our view this approach is at odds with the high trust high accountability of the new approach to quality assurance. In the new environment the responsibility for quality is said to rest with the TEO. (Submission 62)

Many submitters also stated that they already undertake reviews (for example, Submissions 40 and 42). Similarly, respondents that selected “do not support” change three stated that regular reviews such as these already occurred within their organisations (Submissions 52 and 59). One of these respondents was also concerned with the cost of compliance: “it is now extremely difficult to be able to meet compliance costs and provide quality education” (Submission 51).

Additional comments

There was an additional question in the consultation questionnaire in relation to change three. Question 18 asked “To what extent do you agree or disagree with the idea that provider accreditation should be subject to mandatory periodic review?” The ‘provider accreditation’ was interpreted as either a provider’s statutory accreditation or National Qualifications Framework accreditation (or both).

Table 7: Response count for question 18

Strongly agree	Agree	Neutral	Disagree	Strongly disagree
25%	32.5%	12.5%	20%	10%
10	13	5	8	4

23 of the 40 questionnaire respondents indicated they “strongly agree” or “agree” that provider accreditation should be subject to mandatory review. However, 12 respondents indicated that they either “disagree” or “strongly disagree” with this statement.

One government training establishment, two industry training organisations, two Māori private training establishments, one peak body, three polytechnics, six private training establishments and two universities, agreed with the idea that a provider’s accreditation should be subject to mandatory periodic review. One industry training organisation, four polytechnics and three private establishments did not agree.

One of the respondents that selected “strongly agree” to review of the provider accreditation cited the need for accountability for public funding (Submission 50). Another respondent said that industry training organisations already undertake reviews of their National Qualifications Framework accreditations (Submission 8). A third respondent stated that periodic review of statutory accreditation would align with the requirement for industry training organisations to seek re-recognition as standard setting bodies every five years (Submission 13).

The four respondents that “strongly disagree” commented that statutory accreditation is already subject to review (Submissions 36, 51, 52 and 59). They also indicated that a focus on reviewing National Qualifications Framework accreditation would place further compliance burdens on providers.

Change four: Strengthen and standardise qualification outcome statement requirements

There was strong indication of support for this change (77%). The majority of submissions agreed that strong outcome statements were important. None of the respondents indicated that they did not support change four.

Table 8: Response count for change four

Strongly support change four	Support change four	Neutral or unclear	Somewhat support change four	Do not support change four
35%	41.5%	18%	4.5%	0%
23	27	12	3	0

There was overall support for change four; however, recurring issues were:

- Information on qualification outcome statements is not consistent and more guidance is required.
- Space limits of the Register mean that provider-developed qualification outcome statements have to be shorter than National qualification outcome statements, so important information is not included.
- Concerns on costs of any additional activities to standardise existing qualification outcome statements.

A number of submissions identified the potential importance that clear outcome statements have for learners identifying pathways, and for expressing the skills and knowledge gained. Two submissions (21 and 47) also linked this to the success of the New Zealand Qualifications Framework:

We believe that it is unhelpful for potential users of a unified framework to have multiple qualifications with the same outcomes. (Submission 47)

One of the three respondents that selected “somewhat support” change four said that this change “*is sensible for strongly vocation-specific qualifications*” (Submission 55). This respondent represented a university. Another of these three stated that their outcome statements are already robust, and a review would be costly and resource intensive (Submission 48). Similarly, where submissions did not support this change, it was mainly because they considered their organisation’s outcome statements were already strong. However, many of these requested more guidance on writing good outcome statements:

It seems sensible to have some standardisation in the wording of outcome statements. We would have expected that this was being done currently through the course approval process. However, again without seeing an example of what is expected to be in outcome statements it is difficult to support the proposal strongly. (Submission 31)

Although Register requirements were revised and guidelines drawn up by ITP Quality a few years ago on outcome statements, entry requirements, qualification title etc, there is still inconsistency in the clarity of qualification outcomes. Statements are

lacking in full detail, contradictory, with a focus on content and entry requirements that are often vague and mismatched. Coupled with a need to comply with a limit on the number of characters has compounded the problem. (Submission 33)

There was also an undercurrent of concern at the timelines suggested in which qualification owners would strengthen their qualifications' outcome statements. These concerns also included the perceived potential for added costs.

Change five: Introduce a mandatory pre-development assessment stage for qualifications developers

Overall, change five received the lowest indication of support (47.5%). A relatively high number of submissions indicated they “do not support” change five (15%), and 26% were ‘neutral’ or their response was ‘unclear’.

Table 9: Response count for change five

Strongly support change five	Support change five	Neutral or unclear	Somewhat support change five	Do not support change five
9%	38%	26%	11%	15%
6	25	17	7	10

Recurrent issues were:

- Perceptions of added compliance and cost, with little value-added.
- Concerns over what place self-assessment and external evaluation and review will have in meeting the requirements of the reviews.
- In addition to the above, questions of whether the reviews will require external validation.

One government training establishment, three industry training organisation, three polytechnics and six private training establishments were among the 25 respondents that “support” change five. One indicated that such a system would need to be applied to all types of qualification (Submission 8). Another indicated that such a system may need to be piloted or trialled before full implementation (Submission 1). This change also received much support from representative and peak bodies across the sector. Some also considered change five as a ‘given’ if change six is adhered to, and vice versa.

Qualification developers formed those groups that did not support this change. Of the 10 respondents that indicated they “do not support” change five, three were industry training organisations, three were polytechnics, one was a private training establishment and one was a wānanga. There was a concern that this stage would further reduce the timeliness of qualification development. Many providers acknowledged that local qualification development is preferable because of its flexibility and the pace at which a new qualification can be brought into the market, compared with working with a national standard setting body’s standards or qualifications.

Other comments were connected with beliefs that NZQA’s approval and registration processes were already lengthy. Concerns with added compliance burdens arising from qualification check systems were also raised. Another respondent indicated that they do not seek national recognition for their qualifications and considered this step unnecessary for a new qualification “*that may essentially be only a local qualification*” (Submission 48).

There were a number of submissions concerned with how the pre-assessment stage would be validated. For many of these submissions, it was unclear what organisation would have responsibility for making pre-development assessments:

Would the SSB (e.g. ITO) or NZQA be responsible for the pre-assessment?
(Submission 11)

Some submitters considered that the pre-development assessments should be the ongoing responsibility of the qualification developer, under the provisions of self-assessment:

The combination of mandatory review and pre-development assessment appears to be a move back to a more compliance type of approach which is inconsistent with self assessment and external evaluation and review. This effect could result in a lack of responsiveness to our primary stakeholders. (Submission 49)

In connection with this, one submitter suggested that there should be financial incentives where providers work collaboratively to assess each other's qualification proposals (Submission 16). Another suggested that NZQA should provide a self-administered online questionnaire which would need to be addressed before a new qualification could be developed:

This would allow the SSB to address these issues/ collect the necessary information [even from NZQA, e.g. check usage etc. if needed] so that when a submission is made all the boxes have been ticked and it shows that the SSB has complied. This would ensure that qualification development is still led by Industry. (Submission 18)

Various submissions asked for further information on what pre-development assessments would be based. In relation to this, a number of submissions noted that the pre-development assessments must be conducted by experts with experience of the education sector.

Change six: Strengthen recognised industry involvement in qualification development

Approximately 65% of submissions were in support of change six. Those submissions that withheld support for change six, or provided an indication of ‘neutral’ or ‘somewhat support’, were from providers, peak bodies and representative bodies. One industry training organisation and one polytechnic were among the three organisations that selected “do not support” change six.

Table 10: Response count for change six

Strongly support change six	Support change six	Neutral or unclear	Somewhat support change six	Do not support change six
20%	44.5%	21.5%	9%	4.5%
13	29	14	6	3

In support of change six, some respondents stated the importance of industry involvement with ensuring employment pathways through qualifications. One respondent indicated that this change would help to shift “*thinking in the sector from the ‘uniqueness’ of individual providers/standard setting bodies to a more collaborative system where providers can still retain their identity, but within a cohesive framework of qualifications*” (Submission 50). A second respondent said this change and change five should go further by giving industry training organisations powers to approve qualifications (Submission 61).

While the majority of submissions supported industry involvement in qualification development, the term ‘industry’ was considered in a wide context. Six respondents specified that they “somewhat support” change six. By and large, industry training organisations were strongly supportive of this change being linked to their legislated representation. For other qualification developers, industry was viewed as a broader concept in which industry training organisations may be part. One respondent noted that not all qualifications require industry involvement. This may suggest that there needs to be more clarity on how industry will be represented.

Key questions on industry involvement included:

- What will constitute relevant and recognised industry involvement?
- How will industry training organisations be involved?
- Will industry and/or industry training organisations be involved with local component approval (at pre-assessment and review stages)?
- How will sectors without any industry training organisation or standard setting body representation be considered?

An important theme from many submissions was that there are different types of stakeholder support relied upon before, during and after the qualification development process. Many responses from providers acknowledged the importance of industry demand. A number of submissions also noted that the Gazetted Criteria require (internal and external) stakeholder support as part of the course approval process:

The current gazetted criteria already require industry support – what will constitute an appropriate level of support? (Submission 24)

This question was also characterised by respondents saying that industry support is already an important part of qualification development. Two submissions specifically noted questions within the self-assessment guidelines which relate to evaluation of stakeholder support. One stated that this change would “happen anyway”:

...through implementation of Self-assessment and External Evaluation and Review (SA [and] EER) and its core questions, specifically Q1: ‘How well do programs and activities match the needs of learners and other stakeholders?’ and Q 5: ‘What is the value of the outcomes for key stakeholders?’ (Submission 28)

Change seven: Provide the public with clear information about whether a qualification is active, inactive or closed

The majority of submissions indicated clear support for change seven, with 88% indicating ‘strong support’ or ‘support’ for the proposal to provide information on whether a qualification is active, inactive and closed. There were no submitters that indicated they did not support this change.

Table 11: Response count for change seven

Strongly support change seven	Support change seven	Neutral or unclear	Somewhat support change seven	Do not support change seven
52%	35%	11%	1.5%	0%
34	23	7	1	0

Similar to the responses for change one, submissions were concerned with how the New Zealand Qualifications Framework would be communicated to ensure learners and employers understood what the Framework could tell them about qualifications. There were varying opinions expressed on how much information should be provided to learners on the New Zealand Qualifications Framework. Additional information suggested for the New Zealand Qualifications Framework included:

- new and proposed qualifications under development
- review or expiry dates for qualifications
- links to employment information such as graduate destinations and earning potential of qualifications.

Five submissions indicated that clarity between ‘active’, ‘inactive’ and ‘closed’ is essential. They requested further information on how these would be defined and assessed. Arrangements for exiting qualifications or ‘grand-parenting’ qualifications were also raised as a potential issue. In connection with this, a small number of submissions asked whether a learner’s qualification that becomes ‘inactive’ would be subsequently devalued by employers.

CONCLUSION

The consultation paper sought the views of New Zealand's tertiary education sector on a package of seven proposed changes to the qualification system.

There was strong support for a review of the qualification system, as well as agreement that proliferation and duplication of qualifications is a problem. The package of seven changes received support overall. However, questions of how self-assessment and external evaluation and review would be placed when implementing the changes was raised by many submitters, particularly polytechnics. The potential costs of the changes were also a major concern for submitters. The role of education agencies was commented on throughout.

Changes two and five received the most attention from submitters. Change two proposed activities that are not currently usual business practice for many qualification developers. It also proposed changes to existing qualification rules to encourage the use of National and New Zealand qualifications. The detail of change two will be developed further through an expert working group to be established in 2010. Change five proposed an activity many submitters considered a part of good business practice. Opposition was mainly based on the proposed mandatory nature of the review.

This information, gathered from the consultation process, will contribute towards recommendations to the Minister for Tertiary Education.

Appendix A: Consultation submitters

ACE Training Ltd
Agribusiness Training Ltd
Agriculture New Zealand
Ako Aotearoa
Aoraki Polytechnic
Aromaflex Academy
Auckland University of Technology
Bay of Plenty Polytechnic
Bronwyn Hanrahan, Administration Manager, Taranaki Educare Training Trust
Business NZ
Careerforce
Christchurch Polytechnic/Institute of Technology (CPIT)
Competenz
Department of Labour
DJC & Associates
Eastern Institute of Technology (EIT)
EMA Training Centre
ETITO
Leesa Thomason, Director, Above and Beyond Training Ltd
Leisa Harvey, Curriculum Development Manager, FITEC
Framework Solutions Ltd
Hospitality Standards Institute
Independent Training Institutions (ITI)
Industry Training Federation
Institutes of Technology and Polytechnics Quality
Institution of Professional Engineers New Zealand (IPENZ)
Kaitaia Enterprise Agency T/A Kiwidotcom
Karyn Andreassend, Manager ICT, Permanent Recruitment
Learning State
Lincoln University
Linda Neilson, Transition Manager, Ali Bourke, Academic Advisor (School of Trade and Training) and David Scadden, Academic Team Leader (School of Computing, Technology and Communications) Waiariki Institute of Technology
Metropolitan Institutes of Technology and Polytechnics Group
Ministry Training College of New Zealand
Motor Trade Association Inc (MTA)
Nacoll Design Technology
Nelson Marlborough Institute of Technology
New Zealand Association of Private Education Providers (NZAPEP)
New Zealand Institute of Management Academies (NZIM)
New Zealand Tertiary College
New Zealand Vice Chancellors' Committee (NZVCC)
NZ Army
NZITO
Phil Spear, Academic & Quality Section Manager, Northland Polytechnic (Northtec)
Playcentre Education
Retail Institute and NZ Retailers Association

Richard K. Lee, Academic Director, National Institute of Studies
Ross Scobie, Director Academic Services, Northland Polytechnic (Northtec)
Skills Active Aotearoa Ltd
Skills4Work
Social Services ITO
Suzanne Hunt, College Manager, Canterbury College of Natural Medicine
Tai Poutini Polytechnic
Taratahi Agricultural Training Centre
Te Wānanga o Aotearoa
Tertiary Accord of New Zealand (TANZ)
Tertiary Education Union (TEU)
The National School of Aesthetics
The Open Polytechnic of New Zealand
Tranzqual ITO
Unitec
University of Canterbury
Wellington Institute of Technology
Wendy Bradley, Academic Manager, Fruition Horticulture (BOP) Ltd
Western Institute of Technology (WITT)
Whitireia Community Polytechnic

Three submissions were also received from individuals and groups within NZQA.

Appendix B: Consultation questionnaire

Consultation: The Targeted Review of the New Zealand Qualifications System

The following questionnaire contains questions regarding the seven proposed changes for the New Zealand qualifications system. We value your feedback on these changes.

Each proposed change has its own set of questions. You may either provide feedback on all the changes and complete the entire questionnaire, or you can fill out *just* the sections that are of interest to you.

Please ensure that you have read the consultation document before answering this questionnaire. Online responses are preferred, but hard-copy responses are also welcome. The due date for responses is **10 November 2009**.

Please fill out the form and send it via email to: qualificationsreview@nzqa.govt.nz

Alternatively, you can print the questionnaire out and send it to:

Targeted Review Consultation
Policy Unit
NZQA
PO Box 160
WELLINGTON 6140

Before starting the questionnaire, could you please fill out the following information:

- i. Your name, role and organisation

- ii. Is there any other information by which you would like your organisation to be identified e.g. Māori PTE, Pacific provider? Please specify.

- iii. Is your response a personal view or the view of your organisation?

Thank you for taking the time to respond to this consultation.

Change One: Develop a unified New Zealand qualifications framework

1. To what extent do you support a unified outcomes-based qualifications framework for New Zealand? (please place a tick (✓) in one box)

Strongly support change one	Support change one	Neutral	Somewhat support change one	I do not support change one

2. Please provide reasons for your answer to the above:

3. How easy would it be for learners, employers and people from overseas to understand the proposed New Zealand Qualifications Framework, compared with the present New Zealand Register of Quality Assured Qualifications and National Qualifications Framework? (please place a tick (✓) in one box)

Very easy	Easy	No different	Difficult	Very difficult

4. To what extent would the proposed New Zealand Qualifications Framework make the relationships between qualifications clearer, compared with the current framework? (please place a tick (✓) in one box)

Very clear	Clear	No different	Unclear	Very unclear

5. What other alternatives or improvements to the proposed New Zealand Qualifications Framework do you think could improve the clarity and user-friendliness of the system?

6. Please provide any additional comments about change one in the space below.

Change 2: Require the use of existing quality-assured qualifications and change the design rules for national (standards-based) and New Zealand qualifications to allow for more inclusion of local components

7. To what extent do you support NZQA requiring the use of existing quality assured qualifications? (please place a tick (✓) in one box)

Strongly support change two	Support change two	Neutral	Somewhat support change two	I do not support change two

8. Please provide reasons for your answer to the above:

9. What impacts would this change have on qualification developers?

10. One option to increase the flexibility of National and New Zealand qualifications is to allow local components, by either:

- a. setting a percentage range within which local components could most usefully added (e.g. 30 per cent); or
- b. establishing principles for developers and standard setting bodies to determine the appropriateness of local components

Which option do you prefer and why?

11. What else should be taken into account when applying the requirement to use existing qualifications?

12. Please provide any additional comments about change two in the space below.

Change 3: Require mandatory periodic reviews of qualifications to determine whether they are still fit-for-purpose

13. To what extent do you support the introduction of mandatory periodic reviews of qualifications to determine whether they are still fit-for-purpose? (please place a tick (✓) in one box)

Strongly support change three	Support change three	Neutral	Somewhat support change three	I do not support change three

14. Please provide reasons for your answer to the above:

15. What impacts do you think this change will have on qualification developers?

16. How should timeframes for reviews be determined? (e.g. annual or every 3 to 5 years)

17. Do you have any other suggestions on how a qualification remains fit-for-purpose and how this could be shown?

18. To what extent do you agree or disagree with the idea that provider accreditation should be subject to mandatory periodic review? (please place a tick (✓) in one box)

Strongly agree	Agree	Neutral	Disagree	Strongly disagree

19. Please provide any additional comments about change three in the space below.

Change 4: Strengthen and standardise qualification outcome statement requirements

20. To what extent do you support the change to strengthen and standardise qualification outcome statement requirements? (please place a tick (✓) in one box)

Strongly support change four	Support change four	Neutral	Somewhat support change four	I do not support change four

21. Please provide reasons for your answer to the above:

22. Should this change be undertaken for new qualifications only, or applied to all qualifications?

23. Is there any other content (additional skills and knowledge, and education and employment pathways) that you would like to see included in the outcome statements?

24. Please provide any additional comments about change four in the space below.

Change 5: Introduce a mandatory pre-development assessment stage for qualification developers

25. To what extent do you support the introduction of a mandatory pre-development assessment stage for qualification developers before development commences?
(please place a tick (✓) in one box)

Strongly support change five	Support change five	Neutral	Somewhat support change five	I do not support change five

26. Please provide reasons for your answer to the above:

27. Do you have any other suggestions to reduce qualification duplication besides a pre-assessment stage?

28. Please provide any additional comments about change five in the space below.

Change 6: Strengthen recognised industry involvement in qualification development

29. To what extent do you support the change to strengthen recognised industry involvement in qualification development? (please place a tick (✓) in one box)

Strongly support change six	Support change six	Neutral	Somewhat support change six	I do not support change six

30. Please provide reasons for your answer to the above:

31. How much involvement would be considered adequate and how would you expect this involvement to be evidenced?

32. Do you have any suggested alternatives to improve the relevance of qualifications?

33. Please provide any additional comments about change six in the space below.

Change 7: Provide the public with clear information about whether a qualification is active, inactive or closed

34. To what extent do you support the change to provide the public with clear information about whether a qualification is “active” or “inactive” or “closed”? (please place a tick (✓) in one box)

Strongly support change seven	Support change seven	Neutral	Somewhat support change seven	I do not support change seven

35. Please provide reasons for your answer to the above:

36. Are there other categories for the status of qualifications that should be available for the public?

37. Please provide any additional comments about change seven in the space below.

Appendix C: Questionnaire response data

Introduction

45 out of 65 submitters attempted the Likert scale questions in the survey questionnaire. Five of these did not complete all of the Likert scale questions and were removed from this particular analysis. However, all qualitative data was collected and analysed, and it is summarised in the main findings section. This was done to ensure meaningful results. The data summary represents 61.5% of the submissions received.

Change one

There were three Likert scale questions under change one.

Question 1: To what extent do you support a unified outcomes-based qualifications framework for New Zealand?

Strongly support change one	Support change one	Neutral	Somewhat support change one	I do not support change one
52.5%	37.5%	5%	5%	0%
21	15	2	2	0

Question 3: How easy would it be for learners, employers and people from overseas to understand the proposed New Zealand Qualifications Framework, compared with the present New Zealand Register of Quality Assured Qualifications and National Qualifications Framework?

Very easy	Easy	No different	Difficult	Very difficult
7.5%	55%	35%	2.5%	0%
3	22	14	1	0

Question 4: To what extent would the proposed New Zealand Qualifications Framework make the relationships between qualifications clearer, compared with the current framework?

Very clear	Clear	No different	Unclear	Very unclear
12.5%	55%	32.5%	0%	0%
5	22	13	0	0

Change two

Question 7: To what extent do you support NZQA requiring the use of existing quality assured qualifications?

Strongly support change two	Support change two	Neutral	Somewhat support change two	I do not support change two
20%	37.5%	15%	25%	2.5%
8	15	6	10	1

Change three

There were two Likert scale questions under change three.

Question 13: To what extent do you support the introduction of mandatory periodic reviews of qualifications to determine whether they are still fit-for-purpose?

Strongly support change three	Support change three	Neutral	Somewhat support change three	I do not support change three
30%	40%	12.5%	10%	7.5%
12	16	5	4	3

Question 18: To what extent do you agree or disagree with the idea that provider accreditation should be subject to mandatory periodic review?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree
25%	32.5%	12.5%	20%	10%
10	13	5	8	4

Change four

Question 20: To what extent do you support the change to strengthen and standardise qualification outcome statement requirements?

Strongly support change four	Support change four	Neutral	Somewhat support change four	I do not support change four
47.5%	35%	10%	7.5%	0%
19	14	4	3	0

Change five

Question 25: To what extent do you support the introduction of a mandatory pre-development assessment stage for qualification developers before development commences?

Strongly support change five	Support change five	Neutral	Somewhat support change five	I do not support change five
10%	42.5%	12.5%	15%	20%
4	17	5	6	8

Change six

Question 29: To what extent do you support the change to strengthen recognised industry involvement in qualification development?

Strongly support change six	Support change six	Neutral	Somewhat support change six	I do not support change six
27.5%	40%	10%	15%	7.5%
11	16	4	6	3

Change seven

Question 34: To what extent do you support the change to provide the public with clear information about whether a qualification is “active” or “inactive” or “closed”?

Strongly support change seven	Support change seven	Neutral	Somewhat support change seven	I do not support change seven
70%	25%	2.5%	2.5%	0%
28	10	1	1	0

Appendix D: Combined response data

For analysis of submissions that did not use the questionnaire format, responses to each change were coded as ‘support’, ‘unclear or not stated’ and ‘do not support’. This information was combined with the questionnaire data, and applied to the Likert scale, to provide an indication of the level of support for the changes. The combined data is listed below.

Table 12: Response count by organisation type for change one

Organisation type	Strongly support change one	Support change one	Neutral or unclear	Somewhat support change one	Do not support change one	Running total
Government agency			1			1
GTE	1					1
ITO	3	5	1	1	1	11
Maori PTE		1				1
Other		1				1
Peak body	2	7				9
Polytechnic	6	6	2			14
PTE	8	7	4	1		20
Representative body	1	2				3
University	1	1	1			3
Wananga				1		1
Grand Total	22	30	9	3	1	65

Table 13: Response count by organisation type for change two

Organisation type	Strongly support change two	Support change two	Neutral or unclear	Somewhat support change two	Do not support change two	Running total
Government agency			1			1
GTE	1					1
ITO	1	4	4	1	1	11
Maori PTE		1				1
Other				1		1
Peak body		7	1	1		9
Polytechnic	1	4	2	6	1	14
PTE	4	8	6	1	1	20
Representative body	1	2				3
University				3		3
Wananga			1			1
Grand Total	8	26	15	13	3	65

Table 14: Response count by organisation type for change three

Organisation type	Strongly support change three	Support change three	Neutral or unclear	Somewhat support change three	Do not support change three	Running total
Government agency			1			1
GTE		1				1
ITO	2	7		1	1	11
Maori PTE		1				1
Other		1				1
Peak body		6	1		2	9
Polytechnic	2	3	4	2	3	14
PTE	7	5	5	1	2	20
Representative body	1	2				3
University		2		1		3
Wananga		1				1
Grand Total	12	29	11	5	8	65

Table 15: Response count by organisation type for change four

Organisation type	Strongly support change four	Support change four	Neutral or unclear	Somewhat support change four	Do not support change four	Running total
Government agency		1				1
GTE	1					1
ITO	4	4	3			11
Maori PTE		1				1
Other		1				1
Peak body	1	6	2			9
Polytechnic	8	3	3			14
PTE	7	8	4	1		20
Representative body	1	2				3
University	1	1		1		3
Wananga				1		1
Grand Total	23	27	12	3		65

Table 16: Response count by organisation type for change five

Organisation type	Strongly support change five	Support change five	Neutral or unclear	Somewhat support change five	Do not support change five	Running total
Government agency			1			1
GTE		1				1
ITO	1	3	2	2	3	11
Maori PTE			1			1
Other		1				1
Peak body		5	4			9
Polytechnic	2	3	3	1	5	14
PTE	2	10	5	2	1	20
Representative body	1	2				3
University			1	2		3
Wananga					1	1
Grand Total	6	25	17	7	10	65

Table 17: Response count by organisation type for change six

Organisation type	Strongly support change six	Support change six	Neutral or unclear	Somewhat support change six	Do not support change six	Running total
Government agency		1				1
GTE		1				1
ITO	6	3	1		1	11
Maori PTE				1		1
Other		1				1
Peak body		5	4			9
Polytechnic		7	3	2	2	14
PTE	6	8	5	1		20
Representative body	1	2				3
University		1	1	1		3
Wananga				1		1
Grand Total	13	29	14	6	3	65

Table 18: Response count by organisation type for change seven

Organisation type	Strongly support change seven	Support change seven	Neutral or unclear	Somewhat support change seven	Do not support change seven	Running total
Government agency			1			1
GTE	1					1
ITO	5	4	1	1		11
Maori PTE	1					1
Other		1				1
Peak body	4	5				9
Polytechnic	9	3	2			14
PTE	9	8	3			20
Representative body	1	2				3
University	3					3
Wananga	1					1
Grand Total	34	23	7	1		65