Review of internationally-registered nurses being awarded the Bachelor of Nursing degree at UCOL

Introduction

1. On 14 May 2012, the New Zealand Qualifications Authority (NZQA) commenced a review into the Universal College of Learning (UCOL) Bachelor of Nursing pathway for internationally-registered nurses.

2. NZQA began the review in response to publicity and ministerial concern regarding internationally-registered nurses gaining UCOL’s Bachelor of Nursing degree and being declined registration as nurses by the Nursing Council of New Zealand (the Nursing Council).

3. The Nursing Council is responsible for the registration of nurses in New Zealand. It must be satisfied that a candidate for registration has the qualification prescribed for the scope of practice in which he or she wishes to register. The Nursing Council prescribes the qualification required for registration as a nurse as: a Bachelor of Nursing approved by the Nursing Council, a pass in an assessment of Nursing Council competencies for Registered Nurses by an approved provider, and a pass in an Examination for Registered Nurses. Registered nurses from overseas must have a nursing qualification that is equivalent to Level 7 on the New Zealand Qualifications Framework (NZQF). The Nursing Council may treat any overseas qualification as a prescribed qualification if, in the opinion of the Nursing Council, that qualification is equivalent to, or as satisfactory as, a prescribed qualification. The Nursing Council also determines the comparability of overseas qualifications for the purposes of registration as a nurse in New Zealand.

4. In November 2011, the Nursing Council sought advice and comment from NZQA’s Qualifications Recognition Services Business Unit on the comparable NZQF academic learning outcome level for one qualification: a three-year Diploma in General Nursing and Midwifery, studied at the Lourdes School of Nursing, Kochi City, Ernakulam District, Kerala State, India, and awarded in 1997 by the Board of Examination for Nurses in Kerala. NZQA assessed this specific diploma as equivalent to Level 5 on the NZQF. When providing the assessment outcome, NZQA advised the Nursing Council that the level determined was for the specific diploma under review and it should not be used to determine a level outcome for a similar or same named programme of study from a different education institution and different state examination board. For this, the recognition and quality assurance accreditation status of other institutions would need to be individually checked and verified.

5. In May 2012, the Nursing Council stated publicly that it “has always based decisions on registration on current information available at the time a completed application is received”. In this statement, the Nursing Council also advised that a number of Indian diplomas assessed by external nursing educators were similarly assessed as being below Level 7 on the NZQF.

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1 One of NZQA’s functions is to liaise with overseas certifying and validating bodies for the purposes of recognising the equivalency of overseas educational and vocational qualifications with qualifications listed on the NZQF.
6. Prior to November 2011, UCOL has stated that students who completed its Registered Nurse to Bachelor of Nursing (RN-BN) pathway were being accepted onto Competency Assessment Programme (CAP) placements by the Nursing Council, eventually resulting in registration, without apparent issue.

7. UCOL is of the view that the Nursing Council changed its approach to assessing applications for registration. The Nursing Council has disagreed stating that its education standards have not changed.

8. NZQA notes that the review team’s findings do not call into question the quality of the teaching in the RN-BN pathway or the support given to international students by UCOL.
Terms of reference
9. The review, developed in consultation with UCOL, examined the following:

- Whether or not the students have met and achieved the requisite requirements and content for the Bachelor of Nursing.
- The policies, procedures and practices used by UCOL for crediting previous study, and recognising prior learning and clinical experience.
- The student information provided in relation to the Bachelor of Nursing and related programmes of study or training.
- The application of the degree regulations.
- Any other matters relating to the gazetted Criteria for Approval and Accreditation of Programmes. Section 44(1)(a) of the Education Amendment Act 2011 deems those Criteria to be Rules made by NZQA under section 253 of the Education Act 1989.

The RN-BN pathway
10. UCOL’s RN-BN pathway is a one-year programme of study. The RN-BN was originally embedded in the Bachelor of Nursing as a means for upgrading registered nurses who did not hold a Level 7 degree qualification, into the Bachelor of Nursing degree. This pathway was designed for nurses who had trained and practised in New Zealand. Throughout this report it will be referred to as the “RN-BN pathway”.

11. The RN-BN pathway was separately granted accreditation for delivery in India for a limited period and was phased out from India in 2007-8.

Review process
12. NZQA engaged a review team of independent, recognised specialists in nursing education, international education admissions, and recognition of prior learning (RPL) supported by NZQA Quality Assurance expertise.

13. The review team comprised:
- Dr Cathy Andrew, Nurse Educator, Christchurch Polytechnic Institute of Technology
- Mariko Cahn, Academic Admissions Specialist, Victoria University of Wellington
- Dr Robin Day, Educational Consultant – RPL specialist
- Judith Brown, ITP Sector Relationship Manager, Quality Assurance Division, NZQA
- Karen Blakey, Team Leader, Service Delivery, Quality Assurance Division, NZQA.

14. Prior to the review team’s visit, NZQA officials met with RN-BN students and graduates at UCOL on 18 May 2012 to provide advice on the review, and to hear student and graduate concerns. A member of the review team was present at this meeting.

15. The review team visited UCOL on 25 May 2012. The review team facilitated meetings with various staff and stakeholders.
- Senior Management including the Dean and Academic Leader for the School of Nursing. They provided an overview of the Bachelor of Nursing and the RN-BN pathway for internationally-registered nurses.
Registry Manager and Programme Leader for the RN-BN pathway. They outlined the admission process for the RN-BN pathway. RPL policies were also presented and discussed. Folders of relevant supporting documents were provided for the review team to reference during the site visit and to take away and consider further.

The teaching team for the RN-BN pathway presented an overview of the programme including courses offered and support given for students in the programme.

Two reviewers also met with the Marketing Manager, who provided evidence of the marketing materials used for the RN-BN pathway.

One reviewer spoke with the Director of Nursing, from Mid-Central DHB, who reported that the DHB have employed internationally-registered nurses who have completed UCOL’s RN-BN pathway, and they subsequently completed CAPs. She commented on the satisfactory level of competence of these employees and expressed no concerns.

16. The review team also reviewed documents relating to the admissions procedures and RPL policies, procedures and practices at an institutional and programme level.

17. UCOL made all of its international student files for current students available to the review team (hard copies). A random sample of individual student files and documentation was examined by the review team. The number of files reviewed onsite and following the visit represents approximately 11 per cent of the total 183 nursing files.

18. The review team closed the onsite visit with a meeting with Senior Management and provided its initial response in relation to the terms of reference. The findings of the review have been finalised by the review team having reviewed the evidence gained from the site visit and from further evidence provided by UCOL and the Nursing Council.

19. The review team acknowledges the willingness of UCOL staff to assist the review members where possible during the site visit. UCOL staff have been forthcoming throughout the review process and readily provided additional information to the review team.

20. The review process itself has been, by necessity, focused and compressed. UCOL was aware of this when the terms of reference were developed. The review has, at no stage, been conducted on a comprehensive audit basis. NZQA has taken steps to ensure that the review process has been fair to UCOL throughout by providing it with opportunities to respond to the review team’s draft findings and to provide additional written information. However, this has not changed the essential nature of the review as being focused and compressed.

21. On 1 June 2012, UCOL provided NZQA with a submission and supporting material. This material included:

- UCOL Academic Statute 2009 (Version 4.2).
- Recognition of Prior Learning Policy (A02-P02 Version 1.3).
- Recognition of Prior Learning Procedure (A02-R05 Version 1.5).
• MA4010 Bachelor of Nursing Revised curriculum 2001 onwards (2012) (Version 12.1) [Version 1a].
• MA4010 Bachelor of Nursing curriculum document (Version 12.3) [Version 2].
• Handbook for nursing departments offering programmes leading to registration as a registered nurse.
• Flow chart of the processing of RN-BN applications.
• International Student English Language Requirements Policy.
• UCOL proposal to offer the Bachelor of Nursing programme for Registered Nurses in India.
• Correspondence relating to UCOL’s application to deliver the RN-BN pathway at Chandigarh, India (dates: 2 June 2004, 9 June 2004, 13 August 2004, 9 June 2005)
• Correspondence relating to approval and accreditation processes for UCOL’s Bachelor of Nursing (dates: 2 March 2001, 12 December 2003, 19 November 2003, and 3 November 2007).
• Various degree monitoring reports.
• UCOL’s draft external evaluation and review report dated 10 May 2012.

22. The review team provided UCOL with its preliminary findings of the review on 14 June 2012 for response by 22 June 2012. NZQA later agreed to extend this to 27 June 2012.

23. UCOL provided a response to NZQA with supporting material on 27 June 2012. This material included:

• A copy of a letter from UCOL to the Nursing Council dated 25 June 2012.
• A copy of an appendix detailing the assessments for the RN-BN pathway (undated).
• A copy of a template document that Chinese applicants for the RN-BN pathway are required to sign, which states that students who have not studied nursing at tertiary level will not meet Nursing Council requirements for registration (undated).
• A copy of a letter from UCOL to an RN-BN applicant dated 25 November 2011 requesting information in support of the application to be certified. A handwritten note at the bottom of the document says “Certified copy never received. Not accepted into RNBN. [signature] 25/6/12”.
• A copy of a document titled Application to Enrol – International (undated).

24. The review team provided UCOL with its draft final findings for comment on 7 August 2012. The review team has fully considered all comments and submissions put forward by UCOL when forming the final findings of the review.

25. The review team will address other matters raised in UCOL’s response as it pertains to the terms of reference and the findings of the review throughout this report.

26. The review team also invited comment from the Nursing Council on its preliminary findings. On 26 June 2012, the Nursing Council advised NZQA that it did not wish to make any corrections and made no substantive comment on the report.

Other quality assurance activities

27. In its 27 June 2012 response to NZQA’s preliminary findings, UCOL stated that its Bachelor of Nursing programme has been under close scrutiny by NZQA and subject to annual degree monitoring.
28. ITP Quality\(^2\) and the Nursing Council monitored UCOL’s Bachelor of Nursing. The monitoring reports, starting in 2009, provide updates on the progress UCOL is making on phasing out Version 1a of its Bachelor of Nursing programme, and how UCOL is transitioning between two versions (e.g. with regard to teaching staff workload). The 2010 report notes that “The school has identified that they will have a small cohort completing their programme from the old BN curriculum in 2011” (page 3).

29. While the monitoring reports note the RN-BN pathway, it is not clear whether the pathway was being monitored. The monitoring visits were focused on the implementation of Version 2 of the Bachelor of Nursing, and the student profile summaries by year/level of the programme (duration three-years) do not include information on the RN-BN cohort.

Acknowledgements

30. NZQA acknowledges changes UCOL has made to its admission process to include the use of the IELTS Test Report Form Verification Service.

31. NZQA commends UCOL’s focus on working with the Nursing Council to develop solutions for RN-BN pathway students. A solution that enabled RN-BN pathway students to meet the Nursing Council’s education standards was proposed by UCOL and agreed by the Nursing Council. This solution was endorsed by Immigration New Zealand and NZQA, and is now being implemented by UCOL.

32. NZQA also acknowledges and commends UCOL’s early formal advice (1 June 2012) that it has discontinued offering the RN-BN pathway and that the May 2012 intake was the final cohort of the pathway.

\(^2\) ITP Quality was the quality assurance body responsible for the ITP (institute of technology and polytechnic) sector on delegated authority from NZQA until 2010.
Background of UCOL’s Bachelor of Nursing Degree and the RN-BN pathway

33. UCOL has offered the Bachelor of Nursing since 1993. At this time, the RN-BN pathway was embedded in the Bachelor of Nursing programme\(^3\). This expired Bachelor of Nursing programme is referred to as Version 1 in this paper.

34. In 2001, UCOL made major changes to its Bachelor of Nursing curriculum and the RN-BN pathway continued to be embedded in the programme. Following a Nursing Council audit process and NZQA approval and accreditation in 2002, the major changes to the programme were approved by NZQA and the Bachelor of Nursing was accredited by the Nursing Council for a further five years. This expiring Bachelor of Nursing programme is referred to as Version 1a in this report.

35. In 2004, NZQA accredited UCOL to deliver an RN-BN programme for registered nurses in India. This was a site specific accreditation, which was to be reviewed after one year. This programme was run for approximately three years in India, before being phased out by UCOL in 2007-2008.

36. In 2008, UCOL revised its Bachelor of Nursing programme further. UCOL submitted a new curriculum, which incorporated major changes, for approval to the Nursing Council and ITP Quality. ITP Quality approved the changes on 24 November 2008, and the Nursing Council accredited the programme on 10 December 2008 (with a further monitoring visit to be undertaken within one year). This revised Bachelor of Nursing programme did not include the RN-BN pathway and is referred to as Version 2 (\textit{MA4010 Bachelor of Nursing (09) curriculum document}).

37. UCOL describes in its Version 2 curriculum that changes to its Bachelor of Nursing programme were influenced by the needs of “students, clinical partners, health agencies and key consumer stakeholders within the community and the Nursing Council’s Competencies for Registered Nurses (2007)” (refer page 13, \textit{MA4010 Bachelor of Nursing (09) curriculum document}).

38. UCOL’s curriculum document for the current Bachelor of Nursing (Version 2) includes a transition plan, which states:

\begin{quote}
From January 2009, all new students commencing the BN will be enrolled into the 2009 curriculum [Version 2].
\end{quote}

\begin{quote}
No further new enrolments will now be accepted into Year One of the 2008 BN curriculum [Version 1a]. Students enrolled in that curriculum will have until 2012 to complete their degree (page 33, \textit{MA4010 Bachelor of Nursing (09) curriculum document}).
\end{quote}

39. Table six of the curriculum document also shows how the transition plan was to be implemented from 2009 to 2012, and during this time, papers from the Version 1a programme would be phased out (page 33, \textit{MA4010 Bachelor of Nursing (09) curriculum document}).

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\(^3\) Prior to the Education Amendment Act 2011, NZQA did not differentiate from ‘course’/’programme of study’ and ‘qualification’ in the way it does now.
Findings of the review

40. The review team’s findings, as they pertain to the terms of reference, are summarised as follows:

(i) The review team found that student information provided in relation to the Bachelor of Nursing and related programmes of study or training was clear in specifying that the RN-BN pathway did not meet the Nursing Council’s requirements.

(ii) The review team concludes that UCOL consistently applied its degree regulations pertaining to the expiring Version 1a of the Bachelor of Nursing.

(iii) The review team has observed that students of UCOL’s RN-BN pathway have completed the necessary study provided in the RN-BN pathway they have undertaken. However, the RN-BN pathway is not a separately accredited and approved programme, and students who complete the RN-BN pathway are awarded the Bachelor of Nursing. In this regard, students who complete the RN-BN pathway have not met and achieved the graduate profile outcomes of the Bachelor of Nursing.

The RN-BN pathway is embedded in an expiring Bachelor of Nursing programme, which is approved and accredited, but completion of the RN-BN pathway does not alter the registration status of an internationally-registered nurse with the Nursing Council.

(iv) UCOL has appropriate policies and procedures for crediting previous study, and recognising prior learning and clinical experience. However, the application of these policies and procedures is predicated on documentation being authenticated and verified, and the conduct of a robust admissions process. UCOL did not demonstrate, in relation to the RN-BN pathway applicants, that it has suitable practice in this regard. This makes the consequent allocation of credit problematic. UCOL applied policies from an expiring curriculum that gave considerable credit into the Bachelor of Nursing via the RN-BN pathway.

(v) The review team has not raised any additional concerns with regard to the gazetted Criteria for Approval and Accreditation of Programmes.

41. The review team’s full findings are outlined below.

Whether or not the students have met and achieved the requisite requirements and content for the Bachelor of Nursing

42. UCOL are running two versions of the Bachelor of Nursing programme. These are: the current Bachelor of Nursing programme, approved in 2009 (Version 2), which does not embed the RN-BN pathway; and an expiring version of the Bachelor of Nursing, approved in 2001 (Version 1a), which embeds the RN-BN pathway.

43. Students of UCOL’s RN-BN pathway have completed the necessary study provided in the RN-BN pathway they have undertaken. However, the RN-BN pathway is embedded within an expiring version of UCOL’s Bachelor of Nursing programme, through which RN-BN pathway students would graduate with the Bachelor of Nursing degree. The issues with entry into expiring programmes are outlined in paragraphs 47-55.
44. The review team has concerns that UCOL’s practice for crediting previous study, and recognising prior learning and clinical experience of applicants does not provide the assurance that those applicants meet the necessary education and clinical requirements to gain credit into the RN-BN pathway. Furthermore, completion of the RN-BN pathway does not meet the competencies for the registered nurse scope of practice.

45. Students are not individually assessed to confirm they have met and achieved the graduate profile outcomes. From evidence provided to the review team by UCOL, and on the basis that students who complete the RN-BN pathway gain the Bachelor of Nursing, RN-BN graduates have not met and achieved the graduate profile outcomes of the expiring Bachelor of Nursing (Version 1a). The graduate profile for Version 1a is as follows:

Based on Nursing Council of New Zealand (2005). Competencies for the registered nurse scope of practice. The outcomes of this programme are best reflected in the Profile of the Graduate. We believe that each graduate who successfully completed the programme will:

1. Relate in a professional manner and communicate effectively to support the client through the health care experience.
2. Practise nursing in a manner which the client determines as being cultural safe, and which ensures that the client’s cultural integrity is maintained.
3. Promote and manipulate the environment to maximise client safety, independence, and quality of life/health.
4. Make professional judgements based on thorough assessment skills that will enhance nursing practice, utilising sound knowledge of nursing theory to provide holistic, competent, safe nursing care to clients across their life span.
5. Practise nursing in accordance with values and moral principles that promotes client interest and acknowledges the client’s individuality, abilities, culture and choice.
6. Demonstrate the ability to identify ethical issues in nursing and apply processes towards their resolutions.
7. Manage nursing care systematically in a manner that is responsive to the client’s needs, and which is supported by nursing knowledge and technology, and clear rationale.
8. Practise within the principles of the Treaty of Waitangi and the philosophy of Primary Health Care.
9. Practise nursing in accord with relevant legislation and uphold client rights derived from the legislation.
10. Practice nursing within the legal frameworks which define, constrain and protect nursing practices.
11. Demonstrate commitment to evidence-based practice, and contribute to ongoing quality improvement in nursing practice and service delivery.
12. Demonstrate knowledge of teaching and learning processes that assist clients to achieve satisfying and productive patterns of living through health education.
13. Demonstrate commitment and undertakes responsibility for own professional nursing development and contribute to the development and recognition of professional nursing practice.
14. Demonstrate effective leadership skills and professional decision making that ensures that nursing care is assigned and appropriately delegated to those who have the necessary skills, information and education to meet the needs of the client and perform the tasks required effectively and safely.
15. Promote the nursing perspective and contribute effectively and confidently to the inter-professional activities of the health team. (section 1.4.1, pages 27-28)

46. Unlike the three-year 360 credit Bachelor of Nursing, the RN-BN pathway does not lead to registration and does not meet the Nursing Council’s educational standards. However, this is complicated by the fact that RN-BN students graduate with a Bachelor of Nursing degree and the award certificate does not differentiate from the three-year 360 credit Bachelor of Nursing, which does lead to registration.
RN-BN pathway as part of an expiring programme

47. In 2008, UCOL made significant changes to its Bachelor of Nursing programme (Version 1a) and a new programme approval was required as a “Category 2” change. Approval for UCOL’s new Bachelor of Nursing programme (Version 2) was granted by NZQA in 2009.

48. As part of a Category 2 change, NZQA requires details and evidence for “transition arrangements for existing learners” (page 40, NZQA, Approval and accreditation of degrees and related qualifications, August 2010). UCOL provided a transition plan for its current students, which, included a timeline for when all students currently studying Version 1a would complete and Version 1a would be completely phased out and replaced by Version 2. However, UCOL has been enrolling internationally-registered nurses (new students) under Version 1a and onto the RN-BN pathway.

49. UCOL contends that since 2009 it continued to offer the RN pathway under Version 1a in accordance with the transitional provisions in Version 2, which state “No further new enrolments will now be accepted into Year One of the 2008 BN curriculum” (section 2.11, page 34). Specifically, UCOL reported to the review team that the transition plan in Version 2 allocated up to five years to “run the programme out”.

50. The review team acknowledges that the transition plan does not expressly include or exclude phase out of the RN-BN pathway. The language used to describe the transition plan is ambiguous and does not specify a clear direction for the RN-BN pathway.

51. In full, UCOL’s transition plan for replacing Version 1a with Version 2 states (section 2.11, page 34-35):

From January 2009, all new students commencing the BN will be enrolled into the 2009 BN curriculum [Version 2].

No further new enrolments will now be accepted into Year One of the 2008 BN curriculum [Version1a]. Students enrolled in that curriculum will have until 2012 to complete their degree:

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<th>Table six: Transition plan</th>
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52. The review team considers that the overarching principle for any transition arrangement is that no existing student should be disadvantaged by changes to or expiry of the programme or qualification they are studying. A transition plan is required because the old programme is being replaced by a new programme, and the old programme can no longer be offered, so arrangements must be in place to manage existing students. A transition plan is designed to phase out a programme, and the expectation when a programme is being phased out is that the cohort studying the old programme completes within the time specified in the transition (which in this case was five years). The review team does, however, acknowledge that there is currently limited guidance available to institutions about transition arrangements between various versions of curricula.

53. Whilst UCOL’s transition plan does allow for phase out from Version 1a, the review team does not accept that this statement implies that enrolments into Year Two and Three are still appropriate, or that by implication, the RN-BN pathway is equivalent to Year Three of UCOL’s Bachelor of Nursing. RN-BN students are taught as a separate cohort, and take papers at Level 7, some of which are broadly similar to those specified in Year Three of the Bachelor of Nursing, and additional courses seen as being relevant to the circumstances of internationally-registered nurses and the purposes of the RN-BN pathway.

54. The review team considers that this transition plan phases out the Version 1a programme. The transition plan says that “all new students commencing the BN will be enrolled into the 2009 BN curriculum”; it also says that “No further new enrolments will now be accepted into Year One of the 2008 BN curriculum”. However, from 2009, enrolment into Version 1a is “as required by individual students” (see table in paragraph 51).

55. The review team acknowledges and commends UCOL’s early formal advice (1 June 2012) to no longer accept enrolments into the RN-BN pathway.

56. Whilst the review team maintains that UCOL should not have continued to accept new enrolments onto the RN-BN pathway, the review team has considered:

- the policies, procedures and practices for crediting previous study, RPL and recognising clinical experience on the basis of the provisions in Version 1a
- UCOL’s Academic Statute
- UCOL’s written policy and procedures for RPL, and
- other information supplied by UCOL on its admissions processes used for that pathway.

57. In making admissions decisions, the review team found that UCOL was not using a sufficiently consistent or robust process for assessing applications for the RN-BN pathway, assessing the suitability of candidates, verifying accompanying documentation, or for individualised credit transfer. It is on this basis that the review team has formed its conclusions on the practices used by UCOL to admit entry into the RN-BN pathway and award credit.

58. Further to this, the review team continue to have concerns that UCOL’s procedures for assessing the overseas qualifications and the clinical experience of applicants have
not appropriately cross-referenced the outcomes of the graduate profile for Version 1a to ensure equivalency.

Application, Admission and Entry process

59. UCOL’s policies, procedures and practices for crediting previous study and RPL, and assessing clinical experience are applied at the admissions stage.

60. The profile of applicants provided to NZQA by Immigration New Zealand shows that the majority of UCOL’s applicants for the RN-BN pathway over the past three years (2010-2012) are from India, South Korea and China.

61. UCOL’s admission processes involve agents, and UCOL’s Registry Team and Nurse Education Team. Liaison between international applicants, agents and the faculty is undertaken by UCOL’s Registry Team.

62. In its submission (1 June 2012), UCOL provided an overview of the processing of RN-BN pathway applications, which is referred to below (Flow chart of the processing of RNBN applications, document 7).

63. Upon receiving an application for the RN-BN pathway, UCOL reported that the Registry Team enters the documentation into UCOL’s Arion system. A student file is created and documents are dated. An initial document check is completed, and an international checklist is completed. UCOL’s submission provides additional detail on this stage stating that “if an applicant has not provided verified copies of original documents, then administration staff will request verified copies of original documentation.” (Table One: Description of UCOL’s Operational Procedure for RPL for BN).

64. Registry sends the application to the Nurse Education Team to assess student applications for entry to the BN-RN pathway and consequently the award of the standardised credit for RPL.

65. The programme leader reviews all documentation, including translated documents, to look for evidence of obvious discrepancies (e.g. matching dates on verified copies).

66. UCOL determine entry into the RN-BN pathway on the basis of the following information:

   • Evidence of proficiency in English equivalent to IELTS Level 6.5.
   • That the applicant has registration in a country recognised by the Nursing Council as having equivalent nursing registration programmes, i.e. that on applying for registration they would not be refused.
   • Evidence that the applicant has a minimum of one year’s full-time nursing experience during the past five years.

67. Staff stated that the practice of determining entry to the programme involves a check of an applicant’s academic transcript (not the course outline or curriculum document) to ensure it is a three-year nursing programme as opposed to a non-nursing qualification, a check that the applicant is a registered nurse, and a check that the applicant has worked for one year as a registered nurse.

68. UCOL advised that they hold copies of some overseas curricula but not for all the range of applicants they receive and assess for entry and credit in to the RN-BN pathway.
• If the overseas institution or clinical provider “is familiar and known to have had RNs [registered nurses] register in New Zealand in the past”, this knowledge contributes to decisions on enrolment applications. For example, some UCOL staff gained familiarity with some Indian programmes because of their involvement with delivering the RN-BN programme in India.

• If the qualification is unfamiliar to the Nurse Education Team, they will complete website checks as well as review copies of documents of clinical and theory hours in the overseas programmes undertaken by the applicant to ensure these are consistent and match what is in the UCOL Bachelor of Nursing curriculum.

69. UCOL staff then check the IELTS results on the basis of the information provided in the application.

70. Following the completion of checks by the Nurse Education Team, a decision on the outcome of the application is made. UCOL informed the review team that key experienced staff members peer review applications prior to granting approval.

71. If approved, a letter of acceptance/conditional offer is sent by the Registry Team to the applicant.

72. In practice, the review team did not find enough evidence that UCOL’s admissions process was being undertaken consistently or robustly.

Verifying and authenticating documentation

73. UCOL does not require original documents; all documents received by UCOL are scanned copies being produced electronically by agents. Documents viewed were either scanned copies or photocopies, some without sufficient evidence that these had been authenticated, either by UCOL or their agents.

74. UCOL’s admissions process states that staff will request verified copies of documents if these are not received (Table One: Description of UCOL’s Operational Procedure for RPL for BN, UCOL submission, 1 June 2012), but the review team did not find sufficient evidence that this was being carried out in all cases where verified copies were required before an offer of place was made. The review team acknowledges UCOL’s submission stating that “75% of documents are either certified by an agent or equivalent to a Justice of the Peace” (paragraph 56); however, the review team would expect all documents to be verified and authenticated (100 per cent).

75. As a consequence of the agreed scope and timeframe for the review, the review team reviewed a limited number of UCOL’s student files, but given that 100 per cent compliance is expected and on the basis of the issues found in the files viewed, the review team is concerned by its findings. The review team, therefore, does not accept UCOL’s comments in its 27 June 2012 response that the number of files that the review team considered “has limited statistical significance, and is inadequate to form the basis of probative conclusions” (paragraph 55).

76. The review team could not find evidence of what process was used by staff to verify the status of applicants as registered nurses in their country of origin.

77. Additionally, the review team could not find evidence that UCOL was verifying the IELTS Test scores of applicants to ensure these were genuine reports. The commonly used IELTS offers a free online IELTS Test Report Form Verification Service.
(www.ielts.org), which institutions can use to verify that an applicant is presenting a genuine Test Report Form. In its response, UCOL advised that it now verifies all IELTS Test scores using the online service. The review team commends UCOL for this change. UCOL has also since advised the review team that it has retrospectively verified all IELTS Test scores submitted since 1 March 2010 using the online service and all IELTS Test scores have been validated.

Applicable rules for crediting previous study, recognising prior learning and clinical experience, and awarding credit for entry into the RN-BN pathway

78. Credit transfer and clinical practice requirements for applicants of the RN-BN pathway are set out in clauses 2.7.5 and 2.7.6 of the degree regulations of the expiring version of the Bachelor of Nursing (Version 1a). UCOL also has policy and procedures for RPL, which are discussed from paragraph 89.

79. In full these clauses are:

2.7.5 Credit Transfer for Registered Nurses

The curriculum provides provisions for Registered General and Obstetric Nurses, Registered General Nurses, Registered Psychiatric Nurses, Registered Psychopaedic Nurses from hospital-based programmes, Registered Comprehensive Nurses, and overseas registered nurses, and who are currently practising nursing, to obtain their Bachelor of Nursing qualification by enrolling in the Registered Nurse – Bachelor of Nursing programme. It is recognised that, with the multiplicity of means by which individuals have acquired diploma status, applicants will be credited with 260 Credits towards the Bachelor of Nursing programme. These 260 credits are in recognition of the achievement of obtaining the Diploma of Nursing and the applicant’s clinical nursing experience. The remaining 100 Credits (the Bachelor of Nursing is 360 Credits) reflects the areas of knowledge and skills such as research skills, holistic health assessments, teaching and learning theories, sciences, and professional role development including leadership and delegation that were traditionally not included in the Diploma programmes. The core papers of study will focus on the above-identified areas (80 Credits). Further more, applicants will also be able to select two optional papers of their own choice to extent their knowledge and skill in areas they are particularly interested in.

The above is subject to:

a) The overseas registered nurse enrolling as an international student being able to provide evidence of proficiency in English equivalent to IELTS level 6.5.

b) The nurse with overseas registration only, holding registration in a country recognised by NCNZ as having equivalent nursing registration programmes i.e. that on applying for NCNZ registration they would not be refused and directed to enrol in a 3 year programme.

The applicant must be made aware that completion of the Registered Nurse-Bachelor of Nursing programme does not alter the nurse’s registration status with NCNZ.

2.7.6 Clinical Practice Requirements for Registered Nurses

Registered nurses with a minimum of one (1) year’s full-time nursing experience during the past 5 years will not be required to undertaken the practice component of the Programme. For papers that do have attached clinical hours, the equivalent credits will be allocated to Independent Learning Hours. If the applicant has been out of practice for more than 5 years, but less than 10 years, the applicant will be required to successfully complete 1 ‘theory & practice’ (FP) paper at 200 level.

5 March 2001 Academic Approvals Committee changes made to 3.5.3 and 3.5.4.
If more than 10 years or less than 15 years, the applicant will be required to successfully complete 200 level and a 300 level ‘theory & practice’ (FP) paper. (NB: Awarding of the Bachelor of Nursing does not qualify Single Registered Nurses for Comprehensive Registration).

(pages 46-49, MA4010 Bachelor of Nursing (08) – revised curriculum 2001 onwards).

80. In its 27 June 2012 response, UCOL stated that it is “empowered by Rule 2.7.5 and Rule 2.7.6 to award the applicant 260 credits. No other recognition of prior learning is required to enter the RN-BN pathway”. UCOL further stated “that the degree regulations do not require UCOL to assess each individual applicant before awarding credit”.

81. In UCOL’s view, it was not required to and could not apply its general RPL policies and procedures in relation to RN-BN pathway applicants. The reason UCOL provide for this is that the degree regulations require UCOL to award applicants to the RN-BN pathway 260 credits towards the Bachelor of Nursing programme if they meet the criteria for credit transfer (based on clauses 2.7.5 and 2.7.6). UCOL states that the degree regulations set mandatory rules and criteria that UCOL were bound to follow when approving applicants into the RN-BN pathway. UCOL states that the process they followed was required by clauses 2.7.5 and 2.7.6 and consistent with its Academic Statute, and it was not required to follow, and could not follow, a different process to that set out in the degree regulations.

82. The review team acknowledges that UCOL appears to have followed the clauses for credit transfer UCOL state they were bound by (clauses 2.7.5 and 2.7.6). The degree regulations for the Bachelor of Nursing (Version 1a), its Academic Statute, and its RPL policies and procedures are UCOL’s own internal legislation. The review team is of the view that UCOL’s internal legislation should and can be read consistently and that the Academic Statute should also have applied. For the reasons set out below (paragraphs 84-106), the review team considers that the degree regulations outlined the maximum credit allocation, while UCOL’s Academic Statute and procedures for RPL set out the process to be followed.

Recognition of prior learning

83. NZQA has a policy that guides credit recognition (including recognition of prior learning) and credit transfer (Supporting learning pathways: Credit recognition and transfer policy, 2002).

84. The key outcomes of credit recognition and credit transfer are that:

- Credit will be granted for recorded success4, whether or not it forms part or all of a complete qualification.
- Credit will be granted at the highest level consistent with the learner’s demonstrated level of competence.
- Credit transfer arrangements will recognise the distinctive characteristics of qualifications.
- Where credit is not granted, providers will provide clear reasons for the decision.
- Each institution will have procedures in place to enable learners to seek a review of initial decisions on credit transfer matters.
- Information about credit transfer arrangements will be readily available to all learners (Supporting learning pathways: Credit recognition and transfer policy, 2002, page 4).

4 “Recorded success” refers to the record maintained by an accredited organisation relating to the assessment that has occurred.
85. Assessment of prior learning (APL) is a process for recognising past learning experience and achievement.

86. APL is an assessment that makes use of evidence of achievement, which may be informal, such as learning on the job. The term ‘recognition’ implies that skills and knowledge will be recognised by assessment against established criteria.

87. Credit transfer signifies recognition of learning that has taken place in another institution or training arrangement, and credit already achieved for one qualification is recognised towards a new qualification. This may occur on a case-by-case basis between providers and individuals, or as a structured agreement between providers.

88. APL assessment and credit transfer should take place at the admissions stage. Learners being assessed under APL are not likely to already be enrolled with the provider carrying out the assessment as the assessment will form the eventual offer of study.

89. It is the responsibility of institutions to establish policy and procedures for RPL, which includes APL and credit transfer.

90. RPL is defined in UCOL’s *Academic Statute* to mean:

   [The] process through which an individual is granted the award of academic credit based on the relevant learning they have acquired through life experience, work experience and formal or informal education or training. RPL may consist of Formal Internal or Formal External Credit Transfer and/or Cross Credit and/or Non-formal Credit Transfer (page 15).

91. Credit transfer is defined in UCOL’s *Academic Statute* to mean:

   [A] student has completed the same paper as part of another programme at UCOL or at another institution or awarding authority (page 11).

92. UCOL’s *Academic Statute* (specifically Part VI, 6.4) and the definitions in the *Academic Statute* referred to above, demonstrate that UCOL has an obligation to make individualised assessments.

93. UCOL has an RPL policy and RPL procedure to guide credit transfer assessment (A02-P02 Version 1.3 and A02-R05 Version 1.5).

94. The review team has considered UCOL’s RPL practice against what is set out in Version 1a, and UCOL’s *Academic Statute* and RPL policies and procedures. While the review team has considered UCOL against Version 1a the review team notes that the RPL arrangements set out in Version 2 are the most up-to-date and relevant practices.

95. Version 2 specifies that in considering applications for RPL, the following Nursing Council requirements will be adhered to:

   RPL must be granted on the basis of a student's individual qualifications and experience. The proposed individual programme to be undertaken by the student must be sufficient in theory and practice to enable the student to meet the Competencies for the registered nurses scope of practice.

   No RPL may be granted for clinical practice papers in Level Seven of the programme.
Any RPL granted to students during the Level Six clinical practice papers must be submitted to the Nursing Council for approval. ("RPL", Clause 2.7, page 32, MA4010 Bachelor of Nursing (09) curriculum document)

96. Notwithstanding this, the review team is of the view that the information UCOL was collecting from applicants at the application, admissions, and entry stages of the enrolment process could not provide a suitable basis on which to carry out credit transfer in accordance with UCOL’s provisions for RPL.

97. The quality and range of overseas programmes is such that any credit must be based on an assessment of equivalence for every student and credit only awarded on an individual basis. To do this, a complete set of course/curriculum materials, including course descriptors and learning outcomes, as well as authenticated student results, must be available for assessment of equivalence.

98. Good practice in an international admissions process would be to begin with a process for assessing the equivalence of overseas qualifications with UCOL’s Bachelor of Nursing. This should also involve benchmarking the overseas qualification, institution, and learning outcomes to assess comparability. Appropriate databases are available for assessing equivalency of overseas qualifications in relation to New Zealand qualifications – such as UK NARIC and Australian Education International’s NOOSR.

99. The review team has not seen evidence that demonstrates that UCOL has appropriately conducted equivalency testing of the overseas qualifications of the applicants who come into its RN-BN pathway.

Crediting previous study

100. The review team found no evidence that applicants make a formal application for RPL (as per the Academic Statute, Part VI, 6.4). The award of credits is made under the Credit transfer and clinical practice requirements in Version 1a (set out in clauses 2.7.5 and 2.7.6), which did not specify a process in awarding the credit. If students are successful in applying for admission to the RN-BN pathway (as outlined in paragraph 66) applicants are automatically credited with 260 credits towards the Bachelor of Nursing degree.

101. The review team interprets clauses 2.7.5 and 2.7.6 as not providing detail on what processes are to be followed when awarding credit, but rather as giving a maximum credit that can be awarded to registered nurses entering the RN-BN pathway. The review team therefore does not agree with UCOL’s interpretation of clauses 2.7.5 and 2.7.6, or its view that these clauses have precedence over the Academic Statute.

102. UCOL has also referred to clause 1.4 of the Academic Statute. This clause states that, in the case of a conflict between the provisions of UCOL’s statutes, policies or regulations, UCOL’s Chief Executive may decide which provision takes precedence with regard to the matters set out in clause 1.4. UCOL has stated that clause 1.4 permitted its Chief Executive to decide that clauses 2.7.5 and 2.7.6 of degree regulations (Version 1a) take precedence over the provisions of the Academic Statute.

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5 For example, this process would require assessment of the outcomes of an applicant’s qualification against the outcomes of UCOL’s Bachelor of Nursing; the academic transcript does not provide sufficient detail to make such an assessment.

6 These government-run services can provide information on whether or not the institution is internationally-recognised and the comparable level of graduate outcomes against national qualifications frameworks. NZQA’s Qualification Recognition Services Business Unit uses these databases.
referred to above. The review team does acknowledge UCOL’s advice that its Chief Executive has exercised the power in clause 1.4. The review team does not consider that clause 1.4 applies because the review team does not consider that there is a conflict between the Academic Statute and the degree regulations. These documents can be read consistently.

Processes for assessing clinical experience

103. The RN-BN pathway does not contain any clinical experience because of the expectation that nurses enter the programme having already attained at least one year’s clinical experience. For this reason, it is important that the assessment of clinical experience already attained is based on verified and authenticated documentation, and that documentation provides sufficient information on which an assessment can be made.

104. On the basis of the information the review team sighted, the review team cannot be confident that UCOL could have fully assessed the clinical experience of its applicants. The review team was provided with limited evidence that could demonstrate that the practice students are undertaking in their country of origin is equivalent to that required by New Zealand nurses.

105. The review team is of the view that the registration status of an applicant and the attested clinical experience could not be effectively assessed on the basis of the information provided by the applicants. In its 27 June 2012 response, UCOL stated that its Nursing Education Team:

[R]ely on Nursing Council precedent when determining whether a country is recognised by the Nursing Council. For example, all Indian registered nurses are required to have completed the national nursing curriculum and state exam, and nursing registration from India had been recognised by the Nursing Council until December 2011. Therefore, under rule 2.7.5, the assessment process for applicants who identified that they held certified and verified nursing registration from India were not required to provide additional information beyond proof of registration and one year practical experience” (paragraph 26).

106. The review team emphasises that applicants were not providing sufficient information to UCOL at the admissions stages for UCOL to be appropriately following the provisions set out in clause 2.7.5 and 2.7.6 of Version 1a.

The student information provided in relation to the Bachelor of Nursing and related programmes of study or training

107. Published promotional and marketing material, offer letters, and other examples of information provided to prospective students were clear that completion of the RN-BN pathway did not give graduates registration with the Nursing Council.

108. UCOL’s 2012-13 Prospectus lists the full time three-year Bachelor of Nursing and the one-year Bachelor of Nursing for Registered Nurses (RN-BN pathway) separately. The entry requirements confirm that applicants to the RN-BN pathway, who meet the entry requirement, can cross credit 260 credits. The Prospectus also clearly states that the RN-BN pathway does not lead to registration as a nurse in New Zealand.

109. UCOL’s online overview for the Bachelor of Nursing provides the following description of the RN-BN pathway:
The team also offers a degree pathway for registered nurses who wish to upgrade their diploma to a degree, and a Short Course in Competency Assessment for overseas nurses wishing to gain NZ registration, or for NZ registered nurses wishing to return to practice.  

110. Further the Prospectus states that to gain registration “you will generally be required by the Nursing Council of New Zealand to undertake a Competency Assessment Programme (CAP) through an approved provider”. The Prospectus also states that 120 hours of free English language tuition is provided to “help you meet Nursing Council of New Zealand requirements for Registration”.

111. If an internationally-registered nurse applies for registration and is accepted by the Nursing Council, they must successfully complete a CAP placement before the Nursing Council will register them. The Nursing Council advises internationally-registered nurses who are interested in seeking registration in New Zealand to begin the registration application process before coming to the New Zealand.

112. In practice, it appears that students enrolled onto the RN-BN pathway because it provided them with the best opportunity to get onto a CAP.

113. All UCOL information clearly states that the RN-BN pathway does not change a student’s ability to apply for New Zealand nursing registration, but other information indicates the kinds of support UCOL will provide to students who wish to apply for registration. This ambiguity regarding what students can expect from their study may have been confusing to students of the RN-BN pathway, particularly as they graduate with a Bachelor of Nursing degree.

The application of the degree regulations

114. The review team has considered the degree regulations set out in Version 1a and has concluded that UCOL consistently applied these regulations. However, the review team has concerns with UCOL’s practices for crediting previous study and recognising clinical experience used for admitting applicants into the RN-BN pathway, and the continued enrolment of new students into an expiring programme.

115. UCOL has stated that they are “empowered” in their regulations to award credit to RN-BN applicants in the way that they have been doing it; the review team disagrees but accepts that UCOL followed these clauses in the belief that only these two clauses applied. UCOL’s written policy and procedure for RPL (A02-P02 Version 1.3 and A02-R05 Version 1.5) are clear in stating that assessment should occur on an individual basis involving the matching between the learning outcomes of the overseas qualification and UCOL’s Bachelor of Nursing, as well as the equivalent NZQF level, with specific reference to prior formal knowledge. The review team did not find evidence that this assessment was occurring.

116. Further, the regulations set out in Version 1a do not now appropriately reflect UCOL’s current written RPL policies and procedures, or indeed, good practice in RPL. The review team acknowledges that Version 2 better reflects UCOL’s existing RPL policy and procedures.

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7 http://www.ucol.ac.nz/about/faculties/Pages/Nursing.aspx page accessed 12 July 2012, 10.42am
8 New Zealand registered nurses who have not practised for more than a certain period of time must also complete a CAP.
9 “We strongly advise Internationally Qualified Nurses needing to complete a Competence Assessment Programme not to come to New Zealand until they have a confirmed placement.” (see: http://www.nursingcouncil.org.nz/index.cfm/1,29,0,0,html/International-Registration)
117. The review team does accept that the transition plan for phasing out Version 1a set out in Version 2 was expressed in a way that could have been misinterpreted by UCOL and UCOL has stated that it was acting in good faith. The review team, however, believes that UCOL should have been aware of the Nursing Council requirements set out in clause 2.7 of Version 2 (quoted in paragraph 95 above), which would have impacted on the entry of the internationally-registered nurses who were being enrolled into Version 1a.

Any other matters relating to the gazetted *Criteria for Approval and Accreditation of Programmes*

118. The review team does not have any other matters to raise in relation to the gazetted *Criteria for Approval and Accreditation of Programmes.*
Required actions
In considering the findings from the review, NZQA requires UCOL to undertake the following actions:

- Seek independent, expert advice on enhancing and improving its international admission process. This will need to include:
  - The introduction of more robust processes and systems for managing verification and authentication of overseas documentation.
  - The adoption of benchmarking tools, such as UK NARIC and Australian Education International’s NOOSR.

- Review processes and practices for crediting previous study, and recognising prior learning and clinical experience to ensure that the processes and practices are robust and consistently applied.

NZQA has requested that UCOL provide evidence to NZQA by 30 November 2012 that demonstrates these actions have been undertaken.

Acknowledgements
NZQA acknowledges changes UCOL has made to its admission process to include the use of the IELTS Test Report Form Verification Service.

NZQA commends UCOL’s focus on working with the Nursing Council to develop solutions for RN-BN pathway students. A solution that enabled RN-BN pathway students to meet the Nursing Council’s education standards was proposed by UCOL and agreed by the Nursing Council. This solution was endorsed by Immigration New Zealand and NZQA, and is now being implemented by UCOL.

NZQA also acknowledges and commends UCOL’s early formal advice (1 June 2012) that it has discontinued offering the RN-BN pathway and that the May 2012 intake was the final cohort of the pathway.

Notes
The findings from this report do not have retrospective impact on students who have completed the RN-BN pathway.

UCOL has provided feedback on three drafts of this report and disagrees with finding four [paragraph 40(iv)], which concerns the recognition of prior learning and the interpretation of the applicable rules.