



NEW ZEALAND QUALIFICATIONS AUTHORITY  
MANA TOHU MĀTAURANGA O AOTEAROA

QUALIFY FOR THE FUTURE WORLD  
KIA NOHO TAKATŪ KI TŌ ĀMUA AO!

# Further consultation on proposed changes to the New Zealand Qualifications Framework

**July 2019**

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## Introduction

The New Zealand Qualifications Authority (NZQA) is reviewing the New Zealand Qualifications Framework (NZQF) to ensure it remains fit for purpose, flexible and adaptive to the future needs of learners, employers, iwi and other stakeholders. An Advisory Group has been established to support this work (see Appendix 1 for membership).

We first consulted on our proposed changes in October 2018. Our initial consultation paper had four high level proposals for discussion<sup>1</sup>.

This further consultation paper provides more detail of our thinking on these proposals. Our thinking has been informed by the responses that we received to our earlier consultation, further discussion with the Advisory Group and other stakeholders, and desktop research into the issues and opportunities.

### The purpose of the NZQF

The purpose of the NZQF, as currently defined, is ‘to optimise the recognition of educational achievement and its contribution to New Zealand’s economic, social and cultural success.

Specifically, the NZQF:

- conveys the skills, knowledge and attributes a graduate has gained through completing a qualification
- requires the development of integrated and coherent qualifications that meet the needs of individuals, groups, industry and the community
- enables and supports the provision of high quality education pathways
- enhances confidence in the quality and international comparability of New Zealand qualifications
- contributes to Māori success in education by recognising and advancing mātauranga Māori
- represents value for money, is sustainable and robust.’

### What changes did NZQA consult on?

In late 2018, we consulted on four high level proposals:

*Proposal 1:* include a wider range of education products on the NZQF

*Proposal 2:* more explicitly embed transferable competencies into the NZQF (e.g. critical thinking, communication, collaboration and citizenship)

*Proposal 3:* address some long-standing technical issues in the NZQF

*Proposal 4:* make the NZQF easier to use and more relevant to all stakeholders. This includes ensuring that mātauranga Māori is reflected throughout the framework and that mātauranga Māori qualifications are recognised.

The feedback on these proposals has been summarised in Appendix 2.

### What will happen next

We are now seeking feedback on our more detailed proposals, which include some initial decisions.

We will revise the level and qualification type descriptors after we have considered the feedback to the more detailed proposals in this document. We will consult on the detail of the proposed changes to the level and qualification type descriptors later in the review.

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<sup>1</sup> <https://www.nzqa.govt.nz/assets/About-us/Consultations-and-reviews/NZQF-Review/NZQF-consultation-paper-231018-Final.pdf>

We plan to undertake the technical design work on the architecture of the new NZQF by mid 2020. We will seek stakeholders views as part of this process.

We noted in our earlier consultation document that there are a number of important reviews underway. These include the Reform of Vocational Education (RoVE), the NCEA review and the Tomorrows' Schools review. The revised timeline for the NZQF review is intended to provide the sector with sufficient opportunity to engage with us in a meaningful way. By extending the timeline for the NZQF review, it can also be informed by decisions on the NCEA and RoVE reviews.

During the earlier consultation period, some qualification developers expressed concern about the timing of a qualification review following any changes to the NZQF's level or qualification type descriptors. To clarify, with the exception of the proposal regarding the level 7 diplomas, we would expect the developers of existing qualifications and standards to review their qualifications/standards by the scheduled review date (they may need to be reviewed before their scheduled review date for other reasons).

### **How you can respond to the proposals in this document**

You can provide your views on the proposals in this document via the online survey on NZQA's [consultation webpage](#), or in an e-mail to [NZQFReview@nzqa.govt.nz](mailto:NZQFReview@nzqa.govt.nz). You can also provide your feedback in writing to: NZQF Review, Quality Assurance Division, NZQA, PO Box 160, Wellington 6015. Submissions close at 9am on Monday 9 September.

If you have any questions, need more information or would like to provide your feedback in another form, please contact us on the above email address.

## Summary of proposals and consultation questions

In this stage of the NZQF review, we consider each of the identified long standing technical issues as separate proposals.

<p><b>Proposal 1</b></p> <p>Including a wider range of quality assured education products onto a broader qualifications and credentials framework</p>	<p><b>Consultation question 1:</b> To what extent do you support the development of a broader qualifications and credentials framework, which would incorporate the NZQF, the DAS and other quality assured education products (such as micro-credentials and training schemes)? Please tell us your reasons.</p>
<p><b>Proposal 2</b></p> <p>Embedding transferable competencies into the NZQF</p>	<p><b>Consultation question 2:</b> To what extent do you support the proposed approach to embedding critical thinking, collaboration and communication into descriptors of levels 1 – 6 of the NZQF? Please tell us the reasons for your response.</p> <p><b>Consultation question 3:</b> Which of the two options below would be the most effective way of ensuring that learners have citizenship competencies:</p> <p><b>Option A:</b> Including global citizenship competencies in the NZQF purpose statement and the graduate outcomes of the relevant qualification types. If you support this option, which qualification types should these competencies be included in? (e.g. all Certificates at levels 1 – 3 or other?)</p> <p><b>OR</b></p> <p><b>Option B:</b> Narrowing the definition of citizenship and including the competency in the level descriptors. If you support this option, what aspects of citizenship should be included?</p> <p>Please tell us the reasons for your response.</p>
<p><b>Proposal 3</b></p> <p>Ensuring that vocational qualifications can be listed at higher levels of the NZQF</p>	<p><b>Consultation question 4:</b> What further changes could be made to the NZQF to enable vocational qualifications to be listed at higher levels and to encourage the take up of Vocational pathways (i.e. in addition to revising the level and qualification type descriptors and redesigning the presentation of the NZQF)?</p>
<p><b>Proposal 4</b></p> <p>Addressing the level 7 Diploma issues</p>	<p><b>Consultation question 5:</b> Which of the following actions should we take to address the identified issues with the level 7 Diplomas:</p> <ol style="list-style-type: none"> <li>removing the level 7 Diplomas from the NZQF or</li> <li>extending the regulatory framework for New Zealand qualifications at levels 1 – 6 to include level 7 Diplomas, reviewing the description of the qualification type and reviewing all level 7 Diplomas; or</li> <li>other actions.</li> </ol> <p>Please tell us the reasons for your response.</p>

<p><b>Proposal 5</b></p> <p>Addressing the level 8 Bachelor Honours Degree issues</p>	<p><b>Consultation question 6:</b> Which of the following actions should we take to address the identified issues with the Bachelor Honours Degrees:</p> <ol style="list-style-type: none"> <li>renaming the qualification-type (please tell us your suggestion for an alternative name); and/or</li> <li>strengthening the level 8 descriptors and revise the description of the Bachelor Honours Degree to match CUAP's definition; or</li> <li>removing the qualification-type from the NZQF (i.e. removing both pathways) or</li> <li>reclassifying the 480-credit pathway as a level 7 qualification (i.e. removing just the 480 credit pathway from level 8); or</li> <li>considering other options.</li> </ol> <p>Please tell us the reasons for your response, particularly what impact you think the action might have, and any other suggestions you may have.</p>
<p><b>Proposal 6</b></p> <p>Supporting the development of degree apprenticeships</p>	<p><b>Consultation question 7:</b> Are there any other matters associated with degree apprenticeships that we should be considering?</p>
<p><b>Proposal 7</b></p> <p>Addressing other technical issues raised in the review</p>	<p><b>Consultation question 8:</b> Do you have any comment or suggestions on the proposed approach to the identified technical issues?</p>
<p><b>Proposal 8</b></p> <p>Making the NZQF easier to use and more relevant to all stakeholders</p>	<p><b>Consultation question 9:</b> To what extent do you support the proposal to list all credentials and qualifications in te reo? Please tell us why and, if you support the proposal, how you think this should be done.</p> <p><b>Consultation question 10:</b> How should mātauranga be reflected throughout the framework?</p> <p><b>Consultation question 11:</b> To what extent do you support the proposal to identify groups of levels by the core purpose of the qualifications at those levels? What suggestions do you have for grouping and describing these?</p> <p><b>Consultation questions 12:</b> Please tell us your ideas for making the NZQF more accessible to all learners and other stakeholders.</p>

## Our current thinking and revised proposals

In this section, we have made some preliminary decisions and we identify the next steps in each of our proposals. Our guiding principle has been to put the learner first. Whilst each proposal can be considered and implemented independently, they are intended as a package of proposals to ensure that the NZQF continues to meet the needs of all stakeholders and remains fit for purpose.

### Proposal 1: Including a wider range of quality assured education products onto a broader qualifications and credentials framework

We will continue to refer to ‘education products’ for the purposes of this review, although as a term it will not be used in the final refreshed framework.

#### *The opportunity*

We have considered the feedback to this proposal and on balance we consider that it is in learners’ interests to make more information on quality assured education products readily accessible in one place. This will clarify pathways and support lifelong learning.

It is not unusual for qualification frameworks to include a wider range of educational products. Some jurisdictions do this to some extent e.g. Ireland, Finland, Scotland, Holland and Sweden. It is also currently under consideration in the review of the Australian Qualifications Framework.

We have decided not to include non-quality assured education products because we agree with respondents who considered that it would undermine the key purpose of the framework. We have also decided not to explicitly include international or regional qualifications. Such qualifications can already be listed on the NZQF if the qualification meets NZQA’s regulatory requirements.

#### *Our detailed proposal*

We propose to develop a broader qualifications and credentials framework which could include a wider range of quality assured education products. This broader framework could incorporate the NZQF and the Directory of Assessment Standards (the DAS). The broader credentials framework would also include:

- quality assured micro-credentials and training schemes. This excludes micro-credentials provided by organisations for which NZQA has determined their equivalency on the NZQF, as we do not quality assure the delivery or outcomes (these micro-credentials are listed on a separate register).
- any other education products provided by TEOs that are quality assured by NZQA or CUAP<sup>2</sup>.

Figure 2 in Appendix 2 provides an illustration of what a new framework could look like, using a fan design as proposed in our earlier consultation. Learners would be given clear information about the different education products on the new credential frameworks so that they can make well informed choices.

**Consultation question 1:** To what extent do you support the development of a broader qualifications and credentials framework, which would incorporate the NZQF, the DAS and other quality assured education products (such as micro-credentials and training schemes)? Please tell us your reasons.

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<sup>2</sup> The Committee on University Academic Programmes. CUAP is responsible for quality assurance matters in the university sector, including approving qualifications and programmes.

## Proposal 2: Embedding transferable competencies into the NZQF

### *The opportunity*

Embedding transferable competencies into the NZQF is intended to ensure that learners are fully able to participate in a 21st century society, including employment opportunities and life-long learning. The proposed competencies are also well aligned with those expressed in UNESCO's Education for Sustainable Development goals<sup>3</sup>.

Many qualification frameworks embed transferable competencies into their level descriptors. The NZQF currently describes critical thinking at levels 1 - 10 and collaboration at levels 1 – 3. We have carefully considered the feedback and we propose to proceed with the proposal, with a focus on levels 1 – 6.

Our research indicates a range of approaches to embedding transferable competencies in frameworks across the world<sup>4</sup>. Many frameworks in other jurisdictions have three level descriptors – often, *Skills, Knowledge and Competence*<sup>5</sup>. The *Competence* descriptor is the most varied in content across the frameworks. It commonly includes critical thinking, creativity, entrepreneurship, communication and co-operation. Some frameworks also use the competence descriptor to capture the distinctive nature of their education system and sense of nationhood (e.g. their national curricula, national priorities and national sense of identity). Research has also identified that the competency descriptor can cause confusion, in that the difference between skills and competencies is not always clear.

Some jurisdictions systematically describe their key competencies at all levels of their qualification framework e.g. South Africa's framework describes problem solving and communication throughout its ten levels and Scotland's framework describes communication and working with others throughout its twelve levels.

Qualification frameworks do have a role in promoting social change. Some jurisdictions include competencies that are aspects of citizenship<sup>6</sup> in the level descriptors in their qualification framework. For example:

- ethics, professionalism and social values are commonly included e.g. South Africa, Ireland, Croatia and the Netherlands
- competency in a second national language i.e. Finland, with increasing degrees of competency expressed throughout its level descriptors
- cultural diversity and awareness e.g. Malaysia and Ireland.

The New Zealand Curriculum (NZC) and Te Marautanga o Aotearoa (the Māori medium curriculum) also includes competencies which are aspects of citizenship competencies. For example, 'Participating and contributing' in the NZC includes 'the importance of balancing rights, roles, and

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<sup>3</sup> <https://sustainabledevelopment.un.org/focussdgs.html> target 4.7.

<sup>4</sup> *Global inventory of regional and national qualification frameworks 2017 Volume 1, Cedefop and Analysis and overview of NZQF level descriptors in European Countries, Cedefop 2018.*

<sup>5</sup> Some frameworks have more than three level descriptors e.g. Scotland has five, South Africa has ten.

<sup>6</sup> 'Citizenship' includes global competencies, cultural citizenship and respect for diversity, respect for New Zealand's cultural values including Tiriti o Waitangi (Treaty of Waitangi) obligations, civic engagement, leadership, tolerance, ethics and respect for the environment. Underpinning this competency is awareness and openness, flexibility, adaptability, integrity and ethical behaviour.

responsibilities and of contributing to the quality and sustainability of social, cultural, physical and economic environments.’

The assessment of 21st century skills has been researched over the last decade and it shows an evolving picture. A 2009 report identified that whilst many countries include 21st century skills in their regulations or guidelines, there were few specific examples of the definitions and virtually no clear formative or summative assessment policies for these skills<sup>7</sup>. By 2012, research identified that 21st century skills could be and are being assessed but that it requires multiple measures and triangulation of inferences (e.g. designing complex and challenging tasks)<sup>8</sup>.

A 2018 New Zealand report found that assessing key competencies is still an unresolved question internationally<sup>9</sup>. The report concluded that current assessment practices in schools would need to be expanded and adapted. It referenced other research, finding that “21st century skills manifest themselves in an enormous range of expressions, contexts and applications that are beyond the scope of small suite of classroom tasks to definitely assess”. The report also notes the potential for digital assessment of some key competencies, particularly collaboration.

The NCEA review is also considering how best to ensure that the competencies in the curricula are reflected in the qualification. Explicitly embedding the proposed competencies into the framework is intended to stimulate innovation in teaching and assessment practice.

#### *Our detailed proposals*

We intend to review and update the level descriptors more generally to ensure that they are fit for purpose. As part of this process, we propose:

- to retain the current three level descriptors (*Knowledge, Skills and Application*)
- to include three of the four competencies (critical thinking, communication and collaboration) in the level descriptors. We will take a pragmatic approach to this. Critical thinking is already described at levels 1 – 10 and it may not require further updating. For ‘collaboration’ and ‘communication’, we will focus on levels 1 – 6. The competencies may be described by groups of levels within that range (collaboration is already described at levels 1 – 3).
- to consider whether the competencies could be more explicitly aligned with those expressed at levels 6 – 8 of the national curriculum
- two options for including citizenship in the NZQF. The first option is to include ‘global citizenship’ in the purpose statement of the NZQF and in the graduate outcomes of the appropriate types of qualifications (for example, certificates at levels 1 – 3). This option acknowledges the feedback to our earlier consultation – those with higher level qualifications are not ‘better citizens’; that ‘citizenship’ may be confused with notions of immigration status by international students; and that ‘citizenship’ comprises a broad range of specific competencies which may be difficult to describe succinctly in the level descriptors.
- the second option for including citizenship in the NZQF, which we haven’t previously canvassed, is that we narrow the definition of citizenship so that it can be described in the levels of the framework.

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<sup>7</sup> *21st century skills and competencies for new millennium learners in OECD countries* OECD 2009

<sup>8</sup> *Assessing 21st century skills: integrated research findings*, National council on Measurement in Education Vancouver BC Emily R Lai and Michaela Viering 2012

<sup>9</sup> *Trends in Assessment: An overview of themes in the literature*, Rosemary Hipkins and Marie Cameron, NZCER 2018

The extent to which a qualification/credential must demonstrate *all* the requirements of the NZQF (e.g. matches the appropriate descriptors) depends to some extent on the purpose and outcomes of the individual qualification/credential and the amount of learning involved (the credit value). However, the developer must be able to demonstrate an appropriate alignment.

We will appoint international and sector qualification developer experts later this year to update the level descriptors. We will also review and update the qualification type descriptors. This will include reviewing the purpose of the qualification and the graduate outcomes.

**Consultation question 2:** To what extent do you support the proposed approach to embedding critical thinking, collaboration and communication into descriptors of levels 1 – 6 of the NZQF? Please tell us the reasons for your response.

**Consultation question 3:** Which of the two options below would be the most effective way of ensuring that learners have citizenship competencies:

**Option A:** Including global citizenship competencies in the NZQF purpose statement and the graduate outcomes of the relevant qualification types. If you support this option, which qualification types should these competencies be included in? (e.g. all Certificates at levels 1 – 3 or other?)

**OR**

**Option B:** Narrowing the definition of citizenship and including the competency in the level descriptors. If you support this option, what aspects of citizenship should be included?

Please tell us the reasons for your response.

### **Proposal 3: Ensuring that vocational qualifications can be listed at higher levels of the NZQF**

We are using the Ministry of Education’s definition of vocational education and training as education that has a special emphasis on the skills, knowledge and attributes required to perform a specific role or work in a specific industry. This can include qualifications at all levels of the NZQF.

#### *The opportunity*

Reviewing the level and qualification descriptors provides the opportunity to address concerns about the parity of esteem between vocational and academic pathways that were raised through our earlier consultation. Whilst there are no explicit constraints in the NZQF, New Zealand’s vocational qualifications tend to be at lower levels of the NZQF (i.e. most are at levels 1 – 4) compared to other jurisdictions. A 2017 report identifies that the move to learning-outcomes-based levels has resulted in increased visibility of vocational education on qualification frameworks<sup>10</sup>. It cites Germany, with a master craftsman qualification at level 6 on the German framework (the same level as its bachelor degrees). The Swiss National Qualifications Framework for Vocational and Professional Qualifications (NQF-VPQ) is explicitly designed to underline that vocationally orientated training and education can take place at the highest levels of the framework (from levels 3 to 8). Similarly, the Scottish Credit and Qualifications Framework (SCQF) lists vocational qualifications from level 4 through to 12.

The *Language in Trades Education Project*<sup>11</sup> in New Zealand identified that the amount of vocabulary required in written trades course materials is as much as the amount of vocabulary required to read university academic texts. This research also identified a wide diversity of course materials including

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<sup>10</sup> *National qualifications framework developments in Europe* Cedefop 2017.

<sup>11</sup> Ako Aotearoa, Weltec and Victoria, 2017.

pedagogical, legal, regulatory and technical documents (which are themselves complex including text, diagrams, charts, graphs, photos etc). Qualified trades people are able work without supervision in a wide range of contexts.

Learners' (and their parents and whānau) perceptions of vocational education may be influenced by the relatively low levels of vocational qualifications on the framework. This could result in learners making choices which may not lead to the best outcomes for them as individuals. These perceptions may also be contributing to skill shortages in some areas.

We understand from vocational qualification developers that they would like to see more explicit signalling in the NZQF that vocational qualifications can be at higher levels on the framework. This would provide confidence that any redeveloped or new vocational qualification could be listed at a higher level, if it meets the level and qualification-type requirements.

#### *Our detailed proposals*

We propose to:

- review and update the qualification-type and level descriptors on the NZQF to ensure that they reflect both vocational and academic contexts
- redesign the way the NZQF is organised and presented to better signal pathways i.e. the fan design in Appendix 3 Figure 2.

The feedback to our earlier consultation identified that funding and other policy drivers are also contributing to this issue. RoVE is looking at the whole of the vocational education system, including funding and the vocational qualifications system.

**Consultation question 4:** What further changes could be made to the NZQF to enable vocational qualifications to be listed at higher levels and to encourage the take up of Vocational Pathways (i.e. in addition to revising the level and qualification type descriptors and redesigning the presentation of the NZQF)?

### **Proposal 4: Addressing the level 7 Diploma issues**

The discussion and proposals below relate to the level 7 Diplomas only, not the level 7 Graduate Diplomas.

The NZQF defines the purpose of a level 7 Diploma as qualifying individuals with specialised and technical knowledge and skills within a professional context. The qualification must comprise a minimum of 120 credits from level 5 or above, including at least 72 credits at level 7 or above. A summary of current provision is in Appendix 4.

#### *The issues*

The main issue associated with this qualification type is that there are some persistent and on-going quality concerns. Quality issues impact on learners, who may be paying high fees for a qualification with limited value in the workplace. International students are particularly at risk if a TEO is identified as delivering poor quality education outcomes. Quality issues also impact on the reputation of all New Zealand's tertiary education provision internationally. We consider that these issues need to be addressed.

Whilst there appears to be a strong need for level 7 Diplomas in some industries, some have recently been used as a fast track to residency for international students. This led to an increase in provision, and subsequent concerns about international students' English language proficiency. New immigration settings came into effect on 1 December 2018, which reduced the post-study work

rights for sub-degree provision, including the level 7 Diplomas. NZQA has also strengthened its English language requirements and its programme monitoring activities. The impact of these changes is not yet known.

The educational value of some programmes continues to be unclear. There are a wide range of ICT, management, business and sales diplomas available, attracting large numbers of international students. Some of these students have a higher or same level qualification in the same discipline (e.g. a business, nursing or ICT degree). Whilst such programmes are intended to provide the New Zealand context, the evidence that they do this effectively (i.e. lead to appropriate employment outcomes) is unclear.

Level 7 comprises four qualification types, more than at any other level (Appendix 3 Figure 1). The Diploma is the only level 7 qualification not associated with a degree<sup>12</sup>. It is important that all level 7 qualifications are robust and fit for purpose, to preserve the reputation of degree and degree-related programmes.

#### *Potential approaches*

We could remove the level 7 Diploma from the NZQF, which would result in all level 7 Diplomas expiring over time. This would address the quality concerns but would appear to remove a valued vocational pathway to level 7 in some industries. We understand from the feedback that this would have an impact on some industries where the qualification is highly valued and can be the entry-to-practice qualification e.g. air traffic control, the maritime industry and dance. Whilst some level 7 Diplomas would comprise enough credits at the right levels to meet the requirements for another level 7 qualification type, they may not meet the legislative requirement for degree level programmes to be taught mainly by people engaged in research.

Alternatively, we could formally extend the regulatory framework for New Zealand qualifications at levels 1 – 6 to include level 7 Diplomas, strengthen the description of the qualification type to align more closely to other level 7 qualifications and then require a review all level 7 Diplomas. This would include seeking robust evidence that the qualification is meeting employer/industry demand and resulting in appropriate learner outcomes.

**Consultation question 5:** Which of the following actions should we take to address the identified issues with the level 7 Diplomas:

- a) removing the level 7 Diplomas from the NZQF or
- b) extending the regulatory framework for New Zealand qualifications at levels 1 – 6 to include level 7 Diplomas, reviewing the description of the qualification type and reviewing all level 7 Diplomas; or
- c) other actions.

Please tell us the reasons for your response.

### **Proposal 5: Addressing the level 8 Bachelor Honours Degree issues**

The purpose of a Bachelor Honours Degree as defined by the NZQF is to recognise distinguished study at level 8. It recognises outstanding achievement, meritorious achievement or a pass. The degree has a minimum of 120 credits at level 8, which must include a research component that

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<sup>12</sup> The other level 7 qualifications are Bachelor's Degrees, Graduate Diplomas and Graduate Certificates.

represents at least 30 credits at level 8<sup>13</sup>. A summary of current provision is in Appendix 5. There are two pathways to a level 8 Bachelor Honours Degree:

- a 120-credit post-graduate programme of study, following on from a Bachelor's degree in the same discipline (entry is normally based on achievement of above average performance in the Bachelor Degree)
- a 480-credit under-graduate programme of study (entry is normally direct from senior secondary school).

#### *The issues*

NZQA works with other jurisdictions to reference the NZQF with their qualification frameworks. This benefits New Zealanders wishing to use their qualifications overseas and encourages international students to come to New Zealand to study. NZQA's referencing work has identified significant issues with this qualification-type in some jurisdictions. The first issue is the name of the qualification type. In most other jurisdictions, a Bachelor's Degree with Honours is an under-graduate degree (i.e. on the equivalent of NZQF level 7). The naming issue causes confusion in many other jurisdictions and is compounded by the two very different entry criteria for the same qualification.

The two pathways also have two distinct purposes, which is difficult to communicate to other jurisdictions. The 120-credit post-graduate pathway is generally associated with an academic pathway. It typically prepares students for further study at Master's or Doctorate level. The 480-credit under-graduate pathway generally provides a professional pathway. Its purpose is to ensure that students have the skills and knowledge to prepare them for work in their field of study. For example, the Bachelor Engineering Honours is the minimum entry-to-practice qualification for engineers in New Zealand.

These issues have resulted in the NZQF's level 8 being unmatched in the Europe and Hong Kong referencing arrangements. This can affect the holders of all qualifications at level 8, not just the Bachelor Honours Degrees<sup>14</sup>. It can reduce the portability and usefulness of level 8 qualifications in those jurisdictions. No data is collected on the impact of this issue but there is some anecdotal information about the impact of this on individuals. The issues do not appear to be impacting on international student enrolments in Bachelor Honours Degrees in New Zealand.

Australia and South Africa have a similar qualification. Level 8 of the NZQF is referenced with the Australian Qualifications Framework. This supports holders of all level 8 qualifications to have their qualifications recognised in Australia. The impact of the referencing issue is also at least partially mitigated by arrangements which individual professional bodies may have. For example, Engineering NZ is a member of the Washington Accord, which has its own equivalency arrangements to assist with the international mobility of the engineering workforce. Universities New Zealand also has its own agreements with some of its equivalent bodies (e.g. level 8 qualifications are referenced in UNZ's agreement with Germany).

Whilst the issues above undoubtedly have an impact on some individuals, the extent of this is unclear. We seek views on the options below, and particularly on their potential impacts.

#### *Possible approaches*

We could change the name of the qualification type. This would help alleviate the confusion generated by the similarly named but different qualification types in other jurisdictions. However, Bachelor Honours Degrees have strong brand recognition within New Zealand and it might be

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<sup>13</sup> For the universities, CUAP specify that a minimum of 90 credits should be at level 8 and 30 should be at level 9.

<sup>14</sup> Level 8 qualifications also include Postgraduate Diplomas and Certificates.

difficult to identify a different name for the qualification type which would accurately convey its purpose. We seek suggestions on this.

We could remove this qualification type (or one or other of the two pathways) from the NZQF. Removing the 120-credit pathway would take away a 'stepping stone' in the current academic pathway. This would lead to a reduction in choice for learners, although many students may elect to enrol directly onto a Master's. This option would also impact on learners' entitlement to Student Allowances. However, the purpose of the post graduate pathway and its entry criteria are better understood by other jurisdictions and, of the two pathways, this one is of lesser concern.

Removing the 480-credit under-graduate pathway and redefining it as a level 7 qualification would resolve most of the identified issues. We have heard from our engagement with some professional bodies that the programmes require this volume of learning to meet professional requirements. There are 480-credit degrees at level 7, although they do not include a requirement for 30 credits at level 8 for a research component. A change of this nature could impact on any international agreements negotiated by the professional bodies to assist with the mobility of the workforce within their profession. It could also have a greater negative impact on learners than the status quo.

Alternatively, we could review and strengthen the description of the qualification in the NZQF, aligning it with CUAP's<sup>15</sup> i.e. 30 credits at level 9 (rather than level 8 as required by the NZQF) and using CUAP's definition of and expectations of the research component. This option would include better defining the purpose and pathways of the qualification type. Whilst this would not address the fundamental issues, it may make it easier for affected individuals to have their qualification recognised overseas at an appropriate level. It may also make it easier for NZQA to communicate the distinctive purpose of the qualification type, and, ultimately, to reference level 8 with other jurisdictions.

**Consultation question 6:** Which of the following actions should we take to address the identified issues with the Bachelor's Honours Degrees:

- a) renaming the qualification-type (please tell us your suggestion for an alternative name); and/or
- b) strengthening the level 8 descriptors and revise the description of the Bachelor Honours Degree to match CUAP's definition; or
- c) removing the qualification-type from the NZQF (i.e. removing both pathways) or
- d) reclassifying the 480-credit pathway as a level 7 qualification (i.e. removing just the 480-credit pathway from level 8); or
- e) considering other options.

Please tell us the reasons for your response, particularly what impact you think the action might have, and any other suggestions you may have.

## **Proposal 6: Supporting the development of degree apprenticeships**

We previously committed to clarifying level 7 to include degree apprenticeships and there was general support for this proposal. In this context, a degree apprenticeship is a programme of learning which is at least partly on-the-job.

Degree apprenticeships are a relatively new but growing development for vocational higher education. They were introduced in the UK in 2015, initially in nine fields of study. In the UK, they provide an opportunity to combine paid work and academic study to gain a Bachelor's or Master's degree. The programme of study can be delivered through block courses, distance learning or part-time attendance.

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<sup>15</sup> CUAP's requirements can exceed the minimum requirements determined by the NZQF.

The Tertiary Education Commission (TEC) is working with a small group of TEOs and the relevant professional bodies to develop a level 7 engineering degree apprenticeship programme. As in the UK, it is intended to lead to an existing type of degree i.e. a Bachelor of Engineering Technology. The programme of study is likely to integrate academic learning with on-the-job practical training.

This work indicates that an apprenticeship could currently be part of a programme leading to an existing Bachelor's Degree. As such programmes should be able to be approved within the existing architecture of the NZQF and the associated regulatory requirements, we are not proposing any changes to the NZQF to specifically enable degree apprenticeships.

**Consultation question 7:** Are there any other matters associated with degree apprenticeships that we should be considering?

### Proposal 7: Addressing other technical issues raised in the review

Some respondents to our earlier consultation raised other technical issues which they suggested should be addressed in this review. Our proposed response to each of these is set out below.

<i>Other suggested technical issues</i>	<i>Proposed response</i>
a. clarifying the proportion of credits that must be at level 9 in a Master's Degree	There are three pathways to a Master's Degree at level 9. All Master's Degrees are 240 credits, except when they build on a previous relevant qualification.
b. clarifying the three different pathways to a Master's Degree	Two of the pathways (a Master's by thesis and by coursework, and a Master's by thesis) require a minimum of 90 credits at level 9.  The third pathway, a Master's by coursework, requires a minimum of 40 credits at level 9.  We are not proposing to review the requirements for a Master's by coursework at this point, but we are signalling the comparatively low number of credits at level 9 as an issue for NZQA. We will work with CUAP to explore potential solutions.
c. reviewing the purpose of Graduate Certificates and Graduate Diplomas at level 7	The descriptions of all qualification-types, including the purpose and graduate outcome statements, will be reviewed as part of the technical review.
d. reviewing the qualification type naming conventions in the NZQF i.e. certificates are available from level 1 to level 6 and that Diplomas are available from level 5 to level 7	Diplomas at level 7 are under review, although the impact of removing diplomas at level 7 may outweigh the impact of the identified issues. At this point, we are not intending to review the availability of certificates from levels 1 – 6.
e. that the purpose statements of some qualification types needed to be clearer	The purpose statements of all qualification types will be reviewed as part of the technical review. For example, we have indicated that the purpose of Bachelor Honours Degrees could be strengthened to align better with CUAP's description of the qualification.

f. strengthening the requirements for literacy and numeracy	The specified outcomes of all certificates at levels 1 – 3 already include literacy and numeracy skills. We will review the description of all qualification types on the framework. The Ministry of Education has also recently announced changes to NCEA to strengthen the literacy and numeracy requirements.
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**Consultation question 8:** Do you have any comment or suggestions on the proposed approach to the identified technical issues?

## Proposal 8: Making the NZQF easier to use and more relevant to all stakeholders

Many stakeholders (such as learners, parents, iwi and communities and employers) only engage with the NZQF through intermediaries such as secondary schools and tertiary education organisations. There is value in supporting and enabling these stakeholders to directly use the NZQF. This could help learners and their whānau to better understand the levels of qualifications and learning options beyond NCEA. Improving the NZQF's accessibility and functionality could have a positive impact on learners' future career, study choices and lifelong learning.

Some frameworks (e.g. Estonia, the Emirates, Jamaica, Malaysia and the Philippines) group levels of qualifications with a similar purpose together e.g. levels 1 and 2 could be called 'foundation learning', levels 3 – 5 variations on 'core and vocational education' and levels 6 – 7 'professional' (academic and vocational). We think this might help the stakeholders above better understand the purpose and nature of qualifications and we seek feedback on this option.

In the next stage of the review, we will establish a small expert group comprising international and sector experts, including expertise in mātauranga. This group will revise the qualification type and level descriptors, for further consultation later this year. We are also proposing that all qualifications and credentials should be listed in te reo, to raise the visibility of potential pathways to Māori students. We think that the te reo title should be the responsibility of the qualification (or credential) developer, as they are best placed to work with their stakeholders including local iwi to ensure that this is fit for purpose.

We will undertake the technical design work in 2020, following final decisions. This will include the development of a fan design and inter-active versions for different users. We will have further discussions with users (and potential users) of the framework to better understand their needs. We will also translate the NZQF (or revised New Zealand Qualification and Credentials Framework) materials into te reo.

**Consultation question 9:** To what extent do you support the proposal to list all credentials and qualifications in te reo? Please tell us why and, if you support the proposal, how you think this should be done.

**Consultation question 10:** How should mātauranga be reflected throughout the framework?

**Consultation question 11:** To what extent do you support the proposal to identify groups of levels by the core purpose of the qualifications at those levels? What suggestions do you have for grouping and describing these?

**Consultation questions 12:** Please tell us your ideas for making the NZQF more accessible to all learners and other stakeholders?



## Appendix I: Membership of the Advisory Group

Beca Group	Craig Price
Business New Zealand	Rachel Simpson
Engineering NZ	Brett Williams
Employers and Manufacturing Association (EMA)	David Foley
Industry Training Federation (ITF)	Josh Williams
Institutes of Technology and Polytechnics of NZ (ITPNZ)	Tony Gray Susan Smart
Independent Tertiary Education NZ (ITENZ)	Kim Crosland
Mind Lab	Frances Valintine
Ministry of Education	Andy Jackson and Rob Mill
Ministry of Business, Innovation and Employment (MBIE)	Nick Montague
Ministry for Pacific People (MPP)	Terina Cowan
NZ Council of Trade Unions (NZCTU)	Richard Wagstaff
NZ Union of Students' Association (NZUSA)	James Ranstead
Post Primary Teachers Association (PPTA)	Kirsty Farrant
Primary Industry Training Organisation (PITO)	Linda Sissons
Quality Tertiary Institutes (QTI)	Kathy Maclaren
Secondary Principals Association NZ (SPANZ)	Elizabeth Forgie
Tertiary Education Commission (TEC)	Sarah Paterson
University of New Zealand (UNZ)	Dugald Scott
Victoria University of Wellington	Sue Walbran
Wānanga	Elizabeth Nikora/ Evie O'Brien Vaughan Bidois
Wellington Youth Council	Brad Olsen

## Appendix 2: Summary of the feedback to NZQA's earlier proposals

The consultation on proposed changes to the NZQF closed on 14 December 2018. NZQA received 64 responses, which included 46 responses from TEOs, five from education peak bodies, nine from individuals and four from other organisations.

It should be noted that some respondents were responding on behalf of their respective bodies (e.g. the peak bodies) and so represent the views of more than one person or organisation.

### Feedback on proposal 1

We proposed to include a wider range of education products on the NZQF.

#### *Our rationale*

Recognising a wider range of other education products on the NZQF could assist learners to make more informed choices by clarifying pathways. It will also assist employers to recognise specialist skill sets, encourage life-long learning and ensure that employees have the skills and attributes to meet the needs of the future workforce.

#### *Feedback*

Of the 61 respondents who responded to this question, the majority (66 per cent) strongly supported or somewhat supported greater flexibility in the range of quality assured educational products that could be listed on the NZQF. These respondents considered that including quality assured products would promote a wider range of choice, flexibility and employment opportunities and better reflect the contemporary learning environment.

There was a strong theme around the importance of the quality assurance process if this proposal went ahead. In general, there was support for including quality assured micro-credentials, training schemes and assessment standards listed on the Directory of Assessment Standards. There was limited support for including international and regional qualifications.

Those who did not support this proposal (26 per cent strongly opposed or were somewhat opposed) were concerned about the risk of proliferation and confusion. Some respondents were concerned that the proposal would not help learners make good choices e.g. that it could lead to piecemeal learning rather than full qualifications.

Respondents did not support including non-quality assured products on the NZQF. They commented that this would undermine the regulated educational sector and would damage New Zealand's international reputation for high quality education.

### Feedback on proposal 2

We proposed to more explicitly embed transferable competencies into the NZQF (i.e. critical thinking, communication, collaboration and citizenship).

#### *Our rationale*

The impact of digitalisation and automation means that the workforce needs to have the skills, competencies and capabilities to engage in meaningful work throughout their careers and lives.

Employers, iwi and other stakeholders want to ensure that the future workforce meets their needs. Qualifications and other education products need to be relevant, fit-for-purpose and responsive. While this includes technical skills, employers also value employees who can communicate well, take initiative and solve problems.

#### *Feedback*

Of the 58 respondents to this question, 57 per cent strongly or somewhat supported it. Their feedback included the relevancy of the proposed competencies in the 21st century (although some

respondents said the rationale was too focused on employment rather than life-long learning and societal value) and in a globally connected world.

Some respondents supported the proposal in principle but commented that some of these competencies are already included in the knowledge and skills descriptors, although not necessarily systematically. Others thought that the proposed competencies could better align with other competencies in current use e.g. in the New Zealand Curriculum, *Te Marautanga o Aotearoa* and the Employability Skills Framework.

There was some concern about the proposed 'citizenship' competency, with some respondents referring to practicalities and unintended consequences. Some respondents suggested that it could be confused with legal and political status; others that it reflects societal values that should not have a place on a qualification framework. Some respondents commented that it could imply that a level 8 graduate was, for example, a 'better' citizen than a level 4 graduate.

Of those who did not support the proposal (36 per cent strongly or somewhat opposed it), a range of concerns were mentioned. Some felt that there isn't a relationship between higher levels of learning and increased competency (an Economics graduate doesn't need to be more skilled in collaboration than a qualified carpenter). Some respondents were concerned about assessment issues (that the competency may be difficult to assess objectively and that the sector would require significant capability building). Others were concerned about the impact on qualification and programme developers and that the NZQF would exert too much influence on curriculum design. Some respondents also commented that there is a place for purely technical qualifications.

There was mixed support for renaming the current 'application' descriptor 'competencies'. Of 55 respondents, 44 per cent supported the proposal and 40 per cent did not. Those that supported it noted that this is a global trend. The ITO respondents in particular did not support this aspect of the proposal, commenting that the term 'application' is particularly important in vocational contexts. Others noted an overlap between the current 'skills' descriptor and the proposed competencies.

### Feedback on proposal 3

- We proposed to update the level descriptors and address identified technical issues in the NZQF.

39 respondents commented on the proposal to update the level descriptors. All respondents supported the need to update them.

- Consider the level of trades qualifications on the NZQF, and the extent to which differences in parity of esteem are driven by the architecture of the NZQF or other considerations.

Ten respondents commented on this proposal. They were concerned that vocational qualifications tend to be at lower levels of the NZQF compared to most other jurisdictions. They were also concerned about parity of esteem issues. Feedback included that the NZQF must ensure that all skills are recognised and valued. Respondents generally agreed that revising the level and qualification type descriptors would ensure that all can be listed at the appropriate levels on the NZQF.

Other suggestions included explicitly grouping levels of qualifications with similar purposes e.g. 'levels 1 and 2 could be called 'foundation learning' and levels 3 – 5 'core education and skills'.

Some respondents commented that there are other drivers of the parity of esteem issues, including broader societal values, policy and funding issues<sup>16</sup>.

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<sup>16</sup> The funding determination for the Industry Training Fund specifies that a maximum of 10 per cent of the fund can be allocated to training at level 5 and above on the NZQF and that funding for New Zealand Apprenticeships is for qualifications at levels 2 – 4.

- Clarify the utility of Level 7 Diplomas and consider removing them as a qualification type

Of the 18 respondents who commented on this specific issue, 12 said that there is an educational need for this qualification and that it should not be removed. Comments included that it provides a pathway from level 5 in disciplines that are highly technical, practical and applied (e.g. marine engineering, air traffic control, dance). They also commented that the qualifications can meet a well-defined industry need in areas where a degree is either not required or not practically possible.

Four respondents commented that they did not see the value of the qualification type and would support removing them.

- Clarify the qualification definitions for Level 8 Bachelor Honours Degrees

Few respondents commented on this specifically. One respondent noted that there was an urgent need to address the issue, but it is compounded by other factors, such as student allowances<sup>17</sup>. Another considered that addressing the level 8 and qualification type descriptors would help address the issue.

- Clarify level 7 to include degree apprenticeships

Eight respondents commented on this proposal. Five supported the inclusion of degree apprenticeships, one did not, and one was unsure. Those that supported degree apprenticeships commented on the value of increasing the availability of work-based programmes of study and their place in vocational pathways. Those that did not support the proposal considered that degree apprenticeships would not meet the current legislative requirements for degrees<sup>18</sup>, and that having two distinct types of degrees on the NZQF may impact on the international reputation of New Zealand's tertiary education.

- Other technical issues that could be addressed

Some respondents (25) identified other technical issues that could be considered in the next stage of the review. These included:

- clarifying the proportion of credits that must be at a level 9 in a Master's Degree and the three different routes to a Master's Degree
- reviewing the purpose of Graduate Certificates and Graduate Diplomas
- reviewing the qualification type naming conventions in the NZQF i.e. certificates are available from level 1 to level 6 and that Diplomas are available from level 5 to level 7
- that the purpose statements of some qualification types need to be strengthened
- the required standard of literacy and numeracy in NCEA needs to be more explicit.

## Feedback on proposal 4

We proposed to make the NZQF easier to use and more relevant to all stakeholders.

### *Rationale*

Many stakeholders, particularly learners, parents, employers, iwi and communities, only engage with the NZQF through intermediaries such as secondary schools and tertiary education providers. We proposed to redesign the NZQF so that it is more reflective of the values underpinning it and more accessible to the full range of stakeholders.

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<sup>17</sup> The Bachelor Honours Degree is the only post-graduate qualification which provides eligibility for a Student Allowance.

<sup>18</sup> Under section 253B of the Education Act, degrees must be taught mainly by people engaged in research.

### *Feedback*

44 respondents agreed that the usability and accessibility of the NZQF could be improved, particularly for learners. There was support for the fan design as used in the Irish Qualifications Framework and for a segmented customer focussed interactive version of the NZQF. Other suggestions included social media and mobile apps and making more explicit links between qualifications and regulatory requirements; and the international comparability of qualifications. Respondents emphasised that NZQA needs to work with the sector on the redesign and that it needs a focus on the end-user (the learner).

35 respondents commented on the proposal to ensure that the NZQF better reflects *Te Marautanga o Aotearoa*, Tiriti o Waitangi obligations and mātauranga. Respondents generally agreed that the NZQF is mono-cultural in its presentation and supported ensuring that mātauranga is reflected.

Two respondents suggested that the NZQF could do more to position NCEA as New Zealand's foundational qualification.

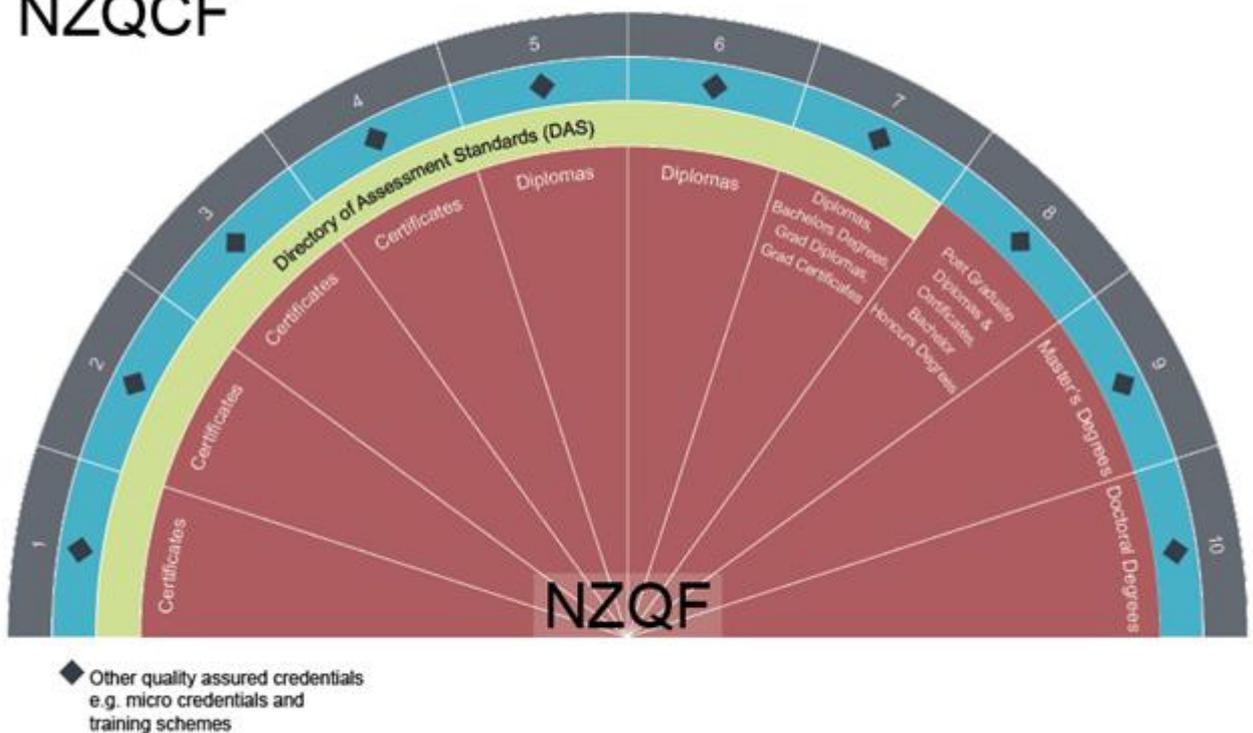
## Appendix 3: The current design of the NZQF and what a revised framework might look like

Figure 1: The current design of the NZQF

LEVEL	QUALIFICATION TYPES
10	Doctoral Degree
9	Master's Degree
8	Postgraduate Diplomas and Certificates, Bachelor Honours Degree
7	Bachelor's Degree, Graduate Diplomas and Certificates
6	Diplomas
5	
4	Certificates
3	
2	
1	

Figure 2: An example of what a broader New Zealand Qualifications and Credentials Framework might look like

### NZQCF



## Appendix 4: Summary of level 7 Diploma provision

- As of April 2019, there are 99 level 7 Diplomas listed on the NZQF. Some qualifications are delivered by more than one TEO:

	PTEs	ITPs	Universities	Wānanga	<b>TOTAL</b>
Number of TEOs delivering Level 7 Diplomas by sector	46	7	2	1	<b>56</b>
Number of Level 7 Diplomas accredited for delivery by sector	108	9	5	1	<b>123</b>

- The table below shows the field of study for the 2,550 EFTS delivered<sup>19</sup> in 2017:

<b>Field of Study</b>	<b>Domestic</b>	<b>International</b>
Natural and physical sciences	15	0
Information technology	70	300
Engineering and related technologies	50	195
Health	165	155
Education	70	0
Management and commerce	65	830*
Society and culture	455	10
Creative Arts	145	30
<b>TOTAL**</b>	<b>1035</b>	<b>1520</b>

\* includes 400 in sales and marketing and 335 in Business and Management

\*\* Data in this table has been drawn from more detailed Ministry of Education data, which rounds to the nearest five to protect the privacy of individuals. Values may not add to the total in the table.

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<sup>19</sup> Professional Association Diploma, National Diploma, New Zealand Diploma and Certificates of Proficiency

## Appendix 5: Summary of level 8 Bachelor of Honours provision

- As of April 2019, there are 176 Bachelor of Honours degrees on the NZQF, one of which is accredited for delivery by two TEOs:

	Universities	ITPs	PTEs	TOTAL
120+ credits	78	7	2	<b>87</b>
480+ credits	87*	2	1	<b>90</b>
<b>TOTAL</b>	<b>165</b>	<b>9</b>	<b>3</b>	<b>177</b>

\* 50 of which are conjoint degrees

- The table below shows the number of students enrolled at any point in Bachelor of Honours study in 2017. 98.7 per cent of all such enrolments in 2017 were in the university sector

	2017
Universities	13,565
ITPs	65
PTEs	105
<b>TOTAL</b>	<b>13,735</b>

Data derived from Education Counts website

- Qualification completions by international students comprised approximately 10 per cent of all qualification completions (both pathways) in 2017
- The graph below shows domestic equivalent full-time students by field of study and qualification type (level 7 and above).

