

Appendix Two: The 2016 survey

Introduction and objective

The New Zealand Qualifications Authority (NZQA) is seeking feedback from Tertiary Education Organisations (TEOs) on the current Offshore Programme Delivery Rules 2012 ([Offshore Rules](#)) settings and on the update of the Offshore Programme Delivery Guidelines 2012 ([the Guidelines](#)).

NZQA's objective is to enable providers to deliver offshore, while preserving the high-quality reputation of New Zealand's qualifications.

The goal of this survey is, firstly, to obtain feedback on the settings of the current Offshore Rules. Secondly, and while we work with the sector on possible changes to the Offshore Rules in the medium term, NZQA would like to update the current Guidelines to enhance their usefulness.

International education offshore delivery context

The emerging space of transnational education is relatively young and dynamic. Internationally, there has been a 50% growth in the last four years; with the global pool of *mobile* international students forecast to grow to around 8 million by 2025¹. While countries such as England and Australia² have had a strong presence offshore, New Zealand has had only modest growth in offshore delivery. The government's aspirations are set out in the **Leadership Statement for International Education (Goal 2)**:

"New Zealand will, over the next 15 years: develop and sustain mutually beneficial education relationships with key partner countries..., increase annual revenues from providing education services offshore to at least \$0.5 billion, increase the number of international students enrolled in providers offshore, from 3,000 to 10,000".

Between April 2012 and July 2016, NZQA received 27 applications for offshore programme delivery. Programmes approved cover a wide range of disciplines and countries³. A recent report shows the revenue from New Zealand's education services delivered offshore rose to \$171 million last year, an increase from an estimated \$104 million in 2012⁴.

TEOs' interest in offshore delivery is expected to continue to increase. This document is a further step in obtaining TEO's feedback on the policy settings that may be required in the future to support that growth.

Feedback request and timeframe

Please provide your feedback by completing this [survey](#) before **14 October 2016**.

NZQA intends to publish updated Guidelines by the end of December 2016

List of abbreviations:

The New Zealand Qualifications Framework (**NZQF**)

NZQF Programme Approval and Accreditation Rules 2013 (**Approval & Accreditation Rules**)

NZQF Offshore Programme Delivery Rules 2012 (**Offshore Rules**)

¹ ICEF Monitor, 2 September 2015.

² According to the UK Higher Education Unit and the Australian Department of Education and Training, 60% of UK and 32% of Australian students are enrolled in offshore delivered programmes. Education NZ estimates the equivalent figure for New Zealand is approximately 3%.

³ Such as Hospitality and Tourism, Education, I.T., and Management. The majority of applications were for delivery in India or Tim Denne, Adolf Stroombergen and Sue Watson China, but also included Russia, Australia, Vietnam, Papua New Guinea, Philippines, Japan, Malaysia, and Tonga.

⁴ Tim Denne, Adolf Stroombergen and Sue Watson. Development and Implementation of a new Valuation Methodology for New Zealand's Education Services Exports, 2 June 2016.

NZQF Qualification Listing and Operational Rules 2012, incorporating NZQF Qualification Listing and Operational Amendment Rules 2013 (**Listing Rules**)

The Education Act 1989 (**The Act**)

1. Are you representing your feedback as:

- Individual
- Peak body
- Organisation

2. Your role/designation:

3. Organisation or peak body name:

4. Which part of the sector do you belong to?

- Institute of Technology and Polytechnic
- Private Training Establishment
- Wānanga
- University
- Other (please specify)

PART ONE – CURRENT OFFSHORE PROGRAMME DELIVERY SETTINGS

The Offshore Rules were developed around two core principles. Firstly, that offshore programmes have comparable quality outcomes to programmes approved and delivered in New Zealand. Secondly, that quality assurance of offshore education is cost effective and does not duplicate other requirements.

With the increasing interest in offshore delivery, a number of questions have emerged about current policy settings. For example, will programme delivery in languages other than English enable New Zealand to have a stronger presence in the offshore market, or will it compromise the reputation/value of NZQF qualifications? What is the relationship between the approval for domestic versus offshore programme delivery?

Please respond to the questions below and include any further comments you wish to make.

- a) What do you consider to be the distinctive benefit/value for an offshore student to gain a qualification listed on the NZQF?**
- b) What are your views on the risks and benefits of offshore delivery of programmes in languages other than the official languages of New Zealand?**

- c) **What quality assurance arrangements would you expect to be in place to protect the reputation of New Zealand’s qualifications provided offshore?** (For example, if a qualification is delivered in a language other than English).
- d) **Are there any parts of the current Approval & Accreditation Rules requirements that you feel may not apply to offshore delivery?** (For example, providing proof of consultation for acceptability of the programme). **If so, please explain which parts and why.**
- e) **Please outline any other matters you have identified concerning the Offshore Rules.**

PART TWO: THE OFFSHORE GUIDELINES UPDATE

The *Guidelines to the implementation of the Offshore Rules* were developed in 2012. Much has changed since then, both in the transnational education environment and in the experience and motivation of New Zealand TEO’s to deliver offshore.

We would like to get your general thoughts around:

- the format of the current Offshore Delivery Guidelines
- the topics to be addressed in the updated Guidelines
- any gaps in our analysis

Looking at the current Offshore Delivery Guidelines (published in 2012):

- a) **What have you found useful?**
- b) **What would you like changed in the updated version?**

QUALITY ASSURANCE ARRANGEMENTS

The general matters outlined below are the result of NZQA working with key offshore delivery providers and government agencies. We welcome all comments.

1. *Comparability versus Equivalence*

Situation: In order for TEOs to deliver a programme offshore, that programme must first meet the criteria of the Approval & Accreditation Rules. TEOs have sought clarification over how to navigate the different requirements of the domestic and the international environment.

Guidance: The Offshore Rules state that the programme must have comparable (not equivalent) learning outcomes, content, student workload and acceptability to the qualification developer, relevant academic bodies, employers, industry bodies, professional bodies and other relevant bodies and communities to those in New Zealand (5.1 Criterion 1).

The criterion also states that resources available to overseas students must be of comparable quality, type and availability to those used in New Zealand (6.1 Criterion 4). The term ‘comparable’ as opposed to ‘equivalent’ acknowledges the differences between the domestic and international contexts. Qualifications are justified on the basis of a strategic purpose statement and an outcome statement, and the approved programme must meet the learning outcomes in the offshore context.

Proposed NZQA Action: Provide an example in the updated Offshore Guidelines.

Comments:

2. **Providing proof of demand for the programme**

Situation: Approval & Accreditation Rule 4.1 Criterion 2 requires TEOs to provide evidence that the proposed programme is based on the skill needs of individuals, groups of learners, employers, industry, and communities. TEOs highlight the complexity of meeting this criterion in an offshore environment.

Guidance: Establishing an offshore partnership will assist in the process of tapping local knowledge about skill needs. This can, in turn, be used as supportive evidence that there is a demand for the proposed programme/qualification.

Proposed NZQA Action: Provide an example in the updated Offshore Guidelines.

Comments:

3. **Programmes that do not lead to an NZQF qualification**

Situation: Determining the role of NZQA when TEOs make commercial arrangements involving programme accreditation by offshore authorities.

Guidance: NZQA plays no role in such arrangements. Offshore programmes that do not lead to a qualification listed on the NZQF are outside NZQA's jurisdiction. Although TEOs can make arrangements with offshore authorities, they cannot advertise these programmes as meeting NZQF requirements, as they are not quality assured by NZQA.

Proposed NZQA Action: Publish a FAQ to clarify the issue.

Comments:

4. **Programme title**

Situation: The Listing Rule 5.2(a) requires the title of qualifications with predominant use offshore to begin with 'NZQF'. Rule 5.2(c) also allows for the title to include the country where the qualification is going to be delivered (e.g. NZQF Diploma in Hospitality (Level 5) (China)). Some TEOs find it challenging to negotiate with offshore partners who have a strong preference for omitting the country name from the brackets following the qualification name.

Guidance: The Listing Rule 5.2(c) states the qualification title **may** include a variety of additions, such as the name of the offshore country, the optional discipline and focus qualifiers, or strands that recognise achievements or specialities. The word 'may' indicates that TEOs can use any of the options. And where practical, the country name should be included to ensure transparency in terms of where it is predominantly delivered. It is at the discretion of NZQA to decide when to apply this criterion. TEOs are encouraged to seek advice while developing their programme.

Proposed NZQA Action: Provide an example in the updated Offshore Guidelines.

Comments:

5. **Requirements for English language competency**

Situation: Are offshore students considered international students? Does Approval & Accreditation's Rule 18 apply to offshore students?

Guidance: Yes. Under Section 159 of the Act, an international student is defined as a person who is not a domestic student; and a domestic student is a New Zealand citizen or resident. Because programmes must be approved under the Approval & Accreditation Rules (including Rule 18), TEOs enrolling offshore/international students must ensure the students have the required level of English language for the programme level they are enrolling in. However, NZQA can apply an exemption to Rule 18 on a case-by-case basis (see sections 249A(1) and 250A(2) of the Act).

Proposed NZQA Action: Publish a FAQ for clarification. Also, provide an example in the updated Offshore Guidelines that shows how TEOs delivering offshore have managed this (e.g. in terms of timing for students sitting the English proficiency testing).

Comments:

6. **Visits to evaluate offshore delivery**

Situation: Offshore Rule 7.2 states that applicants will be advised if the application requires a site visit. At the Offshore Delivery Symposium in June 2016, a TEO enquired about costs associated with this requirement.

Guidance: This should not be a factor that discourages TEOs when assessing the risks of offshore delivery. Since the Offshore Rules took effect in 2012, NZQA has not made any visits to offshore sites. Considering that only Category 1 and two TEOs can apply for offshore delivery, the quality assurance of offshore education is supported by a high-trust model, and quality assurance offshore is viewed as an extension of the domestic quality assurance framework. Note that where the TEO is using an offshore partner organisation, it remains responsible for the actions and performance of the offshore partner in relation to offshore delivery of a qualification listed on the NZQF (Offshore Rule 4.4).

Proposed NZQA Action: Publish a FAQ for clarification.

Comments:

7. **Are there any further issues you would like to bring to our attention?**

8. **NZQA is considering adding the updated Offshore Guidelines to the back of the Approval and Accreditation Guidelines and the Degree and Related Qualifications Guidelines, in order to have the information in one place.**

Agree

Neutral

Disagree



If you disagree, please explain.