



NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

Targeted review of the qualifications system: Mandatory review of qualifications at levels 1 – 6

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INTRODUCTION

In November 2010, the New Zealand Qualifications Authority (NZQA) released a consultation paper *Targeted review of the qualifications system: Mandatory review of qualifications at levels 1 – 6*.

The consultation paper proposed that mandatory reviews of qualifications listed on the New Zealand Qualifications Framework (NZQF) should be conducted in two stages. The first stage being an **initial review** of qualifications designed to reduce duplication and proliferation, and the second stage being ongoing **periodic qualification reviews** designed to ensure qualifications remain fit-for-purpose.

Consultation on these proposals ran for six weeks, and the deadline for submissions was 10 December 2010. In total, 54 formal submissions were received from: tertiary education organisations, industry training organisations, peak bodies and government agencies (see Appendix for a list of submitters).

Feedback from formal submissions is outlined in this paper. This feedback will be taken into consideration in further developing the process for initial qualification reviews and periodic qualification reviews.

SUMMARY OF CONSULTATION FINDINGS

NZQA asked the tertiary education sector to comment on proposed processes for conducting initial and ongoing periodic qualification reviews. Of the 54 submissions received, 48 came from organisations. The remaining 6 submissions were from individuals currently working in education organisations or government. Most submitters used the questionnaire made available by NZQA. Answers to this questionnaire provided by submitters are outlined as part of the summary.

Overall, the majority of submitters supported the proposals and made only minor change suggestions or requested further clarification on the roles and responsibilities of NZQA and qualification developers. Primarily submitters sought detail on working group involvement and participant equity, the criteria for identifying and prioritising qualifications for review, and NZQA's role in managing the review process, as well as disputes.

Initial qualification reviews

The purpose of the initial qualification reviews is to reduce duplication and proliferation in existing qualifications, and progressively align these qualifications with the new requirements for listing qualifications on the NZQF. The majority of submitters were supportive of this purpose.

Question 1: What are the strengths and weaknesses of the proposed process?

NZQA proposed that qualifications will be identified and prioritised for review based on a two step process. The first involved identifying groups of qualifications where there is duplication and/or proliferation. Submitters were particularly supportive of this.

There was some discussion on whether the process for identifying groups of qualifications where there is duplication and/or proliferation was too broad or broad enough. An underlining concern was that there would be too many similar but sufficiently different qualifications included in one subject area, which could potentially create difficulties for working groups looking to develop a unified qualification.

A number of submitters raised an issue that qualification groupings may negatively affect existing qualification pathways. An example given was qualifications at levels 5 and 6 that exit from degrees (also raised under Question 6).

The proposed process allows NZQA to create preliminary groups of qualifications. These qualification groups will then be refined in discussion with the relevant sectors, to ensure they are appropriate and practical.

Question 2: What are your views on the proposed priorities for initial review?

The second process for identifying and prioritising qualifications proposed was to prioritise groups of qualifications based on three factors. These were: degree of proliferation and duplication, areas of economic and strategic importance, and qualification review dates.

All of the 19 submitters who provided comment on the proposal to prioritise qualifications for review by the degree of proliferation or duplication agreed that it was reasonable and important.

Of the 18 submitters who commented on prioritising by areas of economic and strategic importance, 14 did not support it. The main reason for this was possible sector and regional variability in economic importance. A number of these submitters also asked how decisions on economic and strategic importance would be made and by whom, with one submitter stating that only strategic importance should be a consideration. Another submitter suggested that economic and strategic importance would be a more effective method for identifying possible qualification gaps.

Two submitters commented on whether qualification review dates were useful for prioritising qualifications for review. At present, all existing National qualifications have review dates assigned while few provider-developed qualifications do. There was a perception here that only National qualifications would come up for review using this factor, and this was viewed negatively by one submitter.

Two additional factors were also suggested by submitters.

The first factor suggested was to identify qualifications for review in areas where there were comparably large numbers of qualifications in relation to the industry/market size, or where qualifications had low or no enrolments.

The second factor suggested was to begin reviews in areas that were not large, or economically, or strategically significant because this may provide a less complex basis on which the review process can be further tested.

The proposed process will enable NZQA to prioritise qualification groups in a way that is consistent with the aims of the targeted review. But, in addition to this, NZQA welcomes groups of qualification developers initiating reviews based on criteria they consider important.

Question 3: What is your view on the proposed range of participants?

The consultation paper proposed that core working groups are likely to include:

- the qualification developer(s)
- relevant standard setting bodies and regulatory and professional bodies
- education and training providers with necessary accreditation
- representatives from other stakeholders.

This list is not to be considered exhaustive, and opinion was split as to whether the range of participants was adequate. A number of submitters suggested that industry and learners would not be appropriately represented by the groups listed. Some considered the working groups could become too large and unmanageable. In relation to this, there was concern that the voice of smaller groups may not be strong enough in such a setting.

Overall, there is an underlying concern from submitters that their organisation will be negatively impacted by another organisation taking a majority stake or the expense of reviewing qualifications.

Question 4: Should participation be compulsory or voluntary?

Submitters have interpreted Question 4 in two ways. Some viewed this as a question about whether working group conveners must invite all possible stakeholders included in the list, while others viewed it as asking if stakeholders should be able to choose whether or not to participate.

Generally, those submitters that have interpreted the question in the first way state that industry training organisations should be compulsory stakeholders. This group noted that reasonable care should be taken to identify all relevant stakeholders but agreed that not all working groups would include all the participants listed.

Those submitters who have interpreted the question in the second way do not consider participation should be compulsory for stakeholders who have been invited to participate. Furthermore, a few submitters have stated that by not participating a group should lose its right to contest any review outcomes.

Question 5: Are the responsibilities for the review process clearly articulated and appropriate?

In general, submitters considered the process to be appropriate, and suggested changes focused on how the process was articulated. Clarification on the role of industry training organisations, qualification developers and NZQA was most commonly sought.

Question 6: How effective will the proposals be in reducing duplication and proliferation of qualifications?

Most submitters considered the proposals would be effective in reducing duplication and proliferation of qualifications.

An issue raised by five submitters was how the review process would affect exit and embedded qualifications. Primarily, comment centred on the possible impact reviews would have on exit qualifications, which are specifically designed to provide learners with an early exit from a degree programme, and qualifications that straddle more than one subject area (i.e. tourism and travel, information technology and business).

Four submitters raised a different issue regarding the potential for the focus on qualifications to prompt duplication and proliferation of programmes of study. This concern was raised by submitters in a previous consultation on the NZQF qualification design rules, undertaken by NZQA in June/July 2010. As noted at the time by NZQA, this potential problem was recognised at the outset of the internal discussion on the design rules. NZQA has proposed the establishment of a market for programmes and making programme approval more stringent to address the issue.

Question 7: How well do you think this process will contribute towards achieving a strategic sector overview of qualifications?

Most of the 24 submitters who responded to this question considered the process would effectively contribute towards achieving a strategic sector overview of qualifications. Many iterated the process should be linked with the Tertiary Education Strategy, and any other relevant strategic government and industry goals. A small number of submitters were concerned that achieving a strategic sector overview of qualifications was too complex. However, most viewed the focus on more strategic and collaborative qualification development as a positive move.

Periodic qualification reviews

The purpose of periodic qualification reviews is to ensure all qualifications on the NZQF, developed under the requirements for the NZQF, remain useful and relevant to the needs of learners, industry and stakeholders. Overall, submitters were supportive of the proposals for periodic qualification reviews.

Question 8: What are the strengths and weaknesses for the proposals for periodic review?

Many of the strengths given by submitters are those NZQA is seeking from NZQF qualifications. That is:

- industry needs are better linked to qualifications
- the New Zealand workforce is more efficient and mobile
- there is greater employability for graduates
- qualifications are clear, robust and sustainable.

Also, many submitters commented that qualification reviews are part of good practice and corresponded with activities already undertaken by their organisations.

Six submitters commented that the review period of 12 months may be too restrictive, and that five years between qualification reviews was too long. NZQA proposed that the maximum period for review would be five years. It is more than likely that qualifications in fast changing industries, such as Information Technology, would be on shorter review cycles. Qualification developers will have 12 months from the date of the review to submit any changes/new qualifications. However, qualification developers do not need to wait until the review date to begin the review process.

The main weakness perceived by submitters was the apparent insufficient detail on the role and responsibility of qualification developers, including how qualification developers and review participants would be selected, and how qualifications reviews would be conducted and led. Concern was raised that a qualification developer may abscond from responsibility to instigate a qualification review, or that the potential costs of review may be prohibitive to qualification developers not already engaged in reviews (see Roles and Responsibilities, p. 8).

Eight submitters commented on the need for transitioning arrangements to be put in place as part of the review. This included ensuring lead-in times allowed for existing learners to complete expiring qualifications or transfer into any newly created qualification. At present, NZQA requires that industry training organisations and standard setting bodies develop transition plans where new qualifications are replacing existing ones. This requirement will be applied to all qualification developers.

Question 9: How effective are these proposals in achieving the intention of the targeted review change that ensures all qualifications on the NZQF are fit-for-purpose?

Most of the submitters who responded to this question considered the proposals to be effective in achieving the intention of the targeted review. A number of these submitters noted that ensuring the requirements for the system are clear and consistently applied is important for this effectiveness. Two submitters stated that it was difficult to comment on the effectiveness because they considered the consultation paper provided insufficient detail.

Roles and responsibilities

Comments made by submitters in addition to answering the nine questions centred on roles and responsibilities in the qualification review processes. Especially important to submitters was where decision-making and leadership responsibilities would be placed.

Involvement of NZQA

Submitters advocated strongly for NZQA to take more of a leadership role in both the initial and periodic qualification reviews. The consultation paper proposed NZQA would have a coordination role in initial qualification reviews, and that it would be the responsibility of qualification developers to initiate and undertake periodic qualification reviews.

Some submitters asked what role NZQA would take in situations where a qualification developer chooses not to lead or conduct a qualification review, within the stipulated review period or as a result of another trigger.

Involvement of qualification developers

Although, a number of submitters requested criteria for selecting qualification developers, industry training organisations viewed their legislated responsibilities as including the role of qualification developer.

An issue raised by a small number of submitters related to the consequences if a qualification developer opts-out of conducting a qualification review. In connection to this, submitters asked whether another organisation could trigger a review. NZQA intends working with qualification developers who do not comply with the review requirements, including taking action as required to ensure all qualifications on the NZQF are up-to-date and relevant.

Involvement of review working groups

Submitters were supportive of working groups and areas for clarification focused on what criteria would be used to select working group participants, and guide participants in making decisions on qualifications.

Involvement of industry training organisations

Comment was made on what involvement and role industry training organisations would have in the qualification review processes. Some submitters suggested that industry training organisations should have a majority decision-making role in any review panel working in that industry training organisation's gazetted area of coverage. Other submitters were concerned that majority stakes would be detrimental to the review process, particularly if representation was not broad or neutral enough. A number of submitters noted that current review processes industry training organisations are involved with are marred by perceptions of partiality.

APPENDIX

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Agriculture ITO
ATTTO
Bay of Plenty Polytechnic
Building and Construction ITO
Canterbury International College
Carey Baptist College
Christchurch Polytechnic Institute of
Technology
City & Guilds
Communications and Media ITO
Competenz
Eastern Institute of Technology
ETITO
Eve Kawana-Brown, Academic Advisor,
Western Institute of Technology
Evelyn Moody, Evaluator, Framework
Registration, NZQA
FITEC
FRSITO
Hairdressing ITO
Hospitality Standards Institute
Independent Training Institutions
Industry Training Federation
InfraTrain NZ
ITP Quality
Learning State
Linda Neilson, Transition Manager,
Waiariki Institute of Technology
Manukau Institute of Technology
Metro ITPs
Motor Trade Association
Natcoll
New Zealand Association of Private
Education Providers
New Zealand Nurses Organisation
Northland Polytechnic (NorthTec)
NZITP
Open Polytechnic
Otago Polytechnic
Pacific International Hotel Management
School
Peter Sommers, Group Leader, Bay of
Plenty Polytechnic
Playcentre Education Committee
Retail Institute
Tai Poutini Polytechnic
Te Wānanga o Aotearoa
Telford Rural Polytechnic
Tertiary Education Commission
Toi Whakaari: NZ Drama School
Tontine Consultants
Training Systems and Solutions Ltd
UCOL
Unitec Institute of Technology
Vicki Walsh, GTE Manager (Acting),
Department of Corrections
Wellington Institute of Technology
Wellpark College of Natural Therapies
Whitieria New Zealand
Wintec