

**Universities New Zealand Response to  
NZQA’s Consultation on proposed changes to the  
New Zealand Qualifications Framework**

**December 2018**

*Consultation question 1: Do you support the inclusion of the proposed education products onto the NZQF?*

Universities New Zealand does not support this.

The New Zealand Qualifications Framework is a framework of qualifications that currently provides a high level of consistency for qualifications offered in New Zealand. The “products” mentioned in the consultation documents are not qualifications and should not be on the framework. No evidence is provided to support the assertion that their inclusion “could assist learners to make more informed choices, 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 work force”. These admirable goals would be better achieved by other means; for example, better careers guidance for young people, and more stringent application by NZQA of the rule governing the assessment and review of qualifications.

The proposal is also difficult to understand, given the Rules allowing the development and approval of micro-credentials limit these to 40 credits, while the Udacity example provided by NZQA is a 60-credit credential.

The rationale for including assessment standards in the NZQF—that “some are much larger and represent a significant volume of specialist learning”—is highly questionable. The consultation document specifically points out that NZQA will consider options and impacts for adding these to the next stage of the review.

The “volume of specialist learning” in assessment standards should not determine whether these appear on a qualification framework, given an assessment standard is intended to contribute to a qualification. Many individual university courses (and probably ITP and PTE courses) represent a much larger and more significant piece of learning than the examples provided, but this is not an argument for their inclusion in a framework of qualifications.

Overall the proposals seem to illustrate some confusion between the NZQF as a policy/system architecture device and NZQA’s role as a Quality Assurance Body. Unless these can be fully separated, it might be preferable if the NZQF was not managed by NZQA, to ensure that the NZQF remains an “all of system” framework.

*Consultation question 2: What impact would the inclusion of the proposed education products onto the NZQF have on the current purpose of the NZQF and the DAS?*

Including non-qualifications on the NZQF would create a real risk of confusion among those using the NZQF, both in New Zealand and internationally. The first national qualifications framework established in 1991 did not include New Zealand university degrees or qualifications developed by polytechnics and wānanga. International observers were understandably confused by the status and purpose of the framework, and this improved when these quality-assured qualifications were included on the NZQF eight years ago.

The significance of this improvement cannot be overstated, in terms of its importance in placing New Zealand qualifications in the global context. Including micro-credentials, other training schemes, and unit standards from the DAS along with qualifications on the framework would arguably confuse people again, and require, as was the case before 2010, a separate and distinct listing of internationally comparable qualifications.

*Consultation question 3: Are there any risks or unintended consequences that you think NZQA should be aware of?*

There are two risks. The first is that including micro-credentials, other training schemes and unit standards from the DAS on the NZQF may only “window dress” the problems ostensibly being solved. Learners may still make uninformed choices, employers may still not recognise specialist skill sets, programme providers may still not pay enough attention to the changing needs of the future workforce, and not enough people may commit to lifelong learning. These are problems needing urgent remedy, and Universities New Zealand recognises this, but including more “products” on a qualifications framework is unlikely to be effective.

The second risk is that including a large number of non-qualifications on a qualifications framework is likely to create local and international confusion. There is an undeniable need to future-proof the quality, reputation, and international portability of New Zealand qualifications. The proposed changes to the NZQF will simply not help meet this need.

*Consultation question 4: Is there anything else you would like to say about this proposal.*

New Zealand universities operate in a highly competitive environment internationally. Making university qualifications less visible to overseas students and organisations on New Zealand’s official qualifications framework could damage international competitiveness and reduce income from international students.

*Consultation question 5: Should we reframe the Application level descriptor as Competencies? Have you any other suggestions?*

Universities NZ does not support this.

The current Application descriptor reads

*Application of knowledge and skills is the context in which a graduate applies knowledge and skills. Specifically:*

- *Application is expressed in terms of self-management and leadership in a profession or responsibility for the performance of others*
- *The context may range from highly structured to dynamic*

*The learner is progressively more autonomous and more accountable, more responsible for interacting and collaborating with, managing and leading others, within progressively less transparent, more dynamic contexts.*

The current descriptor already helps communicate the kinds of competencies suggested in the consultation. If qualification developers, providers and their quality assurance agencies update it as required by changing contexts, industry demands and consultation, it will also enable these competencies to be regularly reviewed. It is up to providers to demonstrate how a proposed programme meets the criteria for quality assurance, rather than attempt to establish criteria to specify what a programme should contain and how it should be delivered.

Our suggestion is that NZQA more rigorously applies Criterion 7 of the programme approval and accreditation rules, and insists, through the quality assurance and audit and review systems, that programmes are regularly reviewed to take account of the changing demands of the relevant industries and communities.

The inclusion of transferable competencies constitutes curriculum design, and this should not be the function of the framework, which is best seen as a policy tool.

*Consultation question 6: Do you support including the four proposed competencies in the level descriptors (eg, through a newly renamed Competencies level descriptor).*

Universities NZ does not support this proposal.

The existing descriptors allow for the inclusion of such competencies in programme outcome statements. If the competencies in some programme outcome statements are inappropriate, not future-focused, or not what the relevant industry or community wants, then this suggests a failure to review the programmes in a way that takes account of industry and community requirements. Including four new competencies in the level descriptors on the NZQF will not affect existing qualifications, whereas requiring an effective review regime would.

*Consultation question 7: How effective would including these competencies on the NZQF be as a mechanism for ensuring graduates are equipped with the competencies they need for work in the 21<sup>st</sup> century?*

This would be highly ineffective. Criterion 7 of the programme approval and accreditation rules requires that for each approved programme, each institution:

- *Assesses the currency and content of the programme*
- *Has adequate and effective processes for the ongoing review of the programme, taking account of the results of any review of the qualification*
- *Has adequate and effective processes for monitoring the quality of outcomes for learners and other stakeholders, and for reviewing programme regulations and content*
- *Updates the programme accordingly.*

The Academic Quality Agency checks these processes in its academic audits of universities, and NZQA's EER system includes this kind of check in its protocols. Inserting some words in the NZQF descriptors is highly unlikely to remedy any lack of timely and effective review of programmes in some institutions.

*Consultation question 8: If the level descriptors are expanded to include the proposed competencies, how would they work for other forms of credentials such as micro-credentials and unit standards?*

To the extent that micro-credentials and unit standards can be components of qualifications any level descriptors should apply to them, too. However, for the reasons explained in consultation question 6, there is no benefit in introducing new level descriptors.

*Consultation question 9: Would there be any unintended impacts on qualification and programme design from including the proposed competencies more explicitly in the NZQF?*

This might reduce the discussions between industry stakeholders and qualification developers. It might reduce the thought and planning that the Application descriptor currently requires to ensure that qualifications are aimed at graduate requirements in the 21<sup>st</sup> century.

*Consultation question 10: Would there be any unintended impacts on learners and educators or other stakeholders from including these proposed competencies more explicitly in the NZQF?*

It could distract NZQA and providers from effectively implementing the reviews required by Criterion 7 of the Rules. It could interfere with universities' well-established systems for establishing graduate profiles that are distinctive for individual universities.

*Consultation question 11: Is there anything else you would like to say about including the proposed competencies in the NZQF?*

Universities have developed graduate profiles that cover, inter alia, the kinds of competencies suggested by NZQA, and all universities have been audited on the evidence they have for graduates having these competencies. Including the proposed competencies in the NZQF could confuse rather than help learners.

*Consultation question 12: Have we identified all the technical areas that need addressing? Are there other areas that we need to look at?*

NZQA runs the risk of inserting itself between the programme providers and the industry and stakeholders these providers should be serving and consulting frequently. It would be better for NZQA to insist on evidence that programme providers are adhering to the requirements for Criterion 7 of the Rules.

*Consultation question 13: Do you have any comments on the proposed approach to any of the technical issues that have been identified? Are there any alternative options that we have not explored?*

There is an obvious and pressing need to resolve the Level 8/Bachelor's Honours issue mentioned in Proposal 3. In this regard, NZQA's attention is drawn to the changes to the level descriptors universities now apply to Levels 8 – 10. However, any solution will be difficult to implement while the student allowance/loan system considerably favours students undertaking postgraduate study as part of an honours degree over those undertaking such study as part of a master's degree. In one sense this is a technical issue, but it is a technical issue which the funding system would prefer to see unresolved.

Appendix 3 suggests the possible inclusion of "degree apprenticeships" at level 7. These are described as "work-based learning programmes that lead to degree level qualifications". NZQA's attention is drawn to s253B(3) of the Education Act 1989 which states that it "must not consent to the granting of [a degree] unless it is satisfied that the award recognises the completion of a programme of advanced learning that (a) is taught mainly by people engaged in research; and (b) emphasises general principles and basic knowledge as the basis for self-directed work and learning". While it is certainly possible to have a work-based learning programme that leads to a degree qualification (an obvious existing example is the second half of the MBChB) the idea needs far more discussion than the current paper provides. It could be highly contentious if it damaged the quality, reputation and international portability of New Zealand qualifications.

*Consultation question 14: How could the NZQF better recognise New Zealand's Tiriti o Waitangi obligations and matauranga Maori?*

The NZQF is a framework for qualifications, and it is not at all clear why the NZQF might be seen as inappropriate for listing qualifications that recognise New Zealand's Tiriti o Waitangi obligations and matauranga Māori. While the NCEA does provide two curricula at levels 1-3 (the apparent rationale for change in the proposal document), these each provide a pathway to just one (NCEA) qualification. The example in the consultation document reinforces the potential confusion if the NZQF lists qualifications alongside pathways of learning within qualifications.

*Consultation question 15: How could the NZQF best promote the value of all qualifications at all levels of the framework?*

It is not clear that this is a function of a qualifications framework. There is a passing reference to "parity of esteem issues between academic and vocational qualifications" but this is not described. One of the most keenly sought-after university degrees is the MBChB, a clearly vocational qualification. The BE and BE(Hons) are similarly popular.

These are two examples of vocational qualifications with very high esteem, and it is not at all clear that the vocational/academic split is appropriately mentioned here.

*Consultation question 16: Do you have any suggestions for improving the accessibility and relevance of the NZQF and making it more user-friendly for all stakeholders?*

It isn't at all clear what is wrong with learners, parents, etc engaging with the NZQF through intermediaries such as schools and other educational institutions. If "learners do not in general fully appreciate the range of qualifications or learning options beyond NCEA" this may not be a problem with the NZQF. It could be a problem with careers advice, the fragmentation of learning and the blocking of future study options by NCEA, the relatively low levels of literacy and numeracy expected