

Submission by

The Employers and Manufacturers Association

to the

New Zealand Qualifications Authority

on the

Draft Integrated Quality Assurance Framework

December 2024

About the Employers and Manufacturers Association (EMA)

Established in 1886, the EMA is New Zealand's largest business association representing more than 7,000 businesses in the upper half of the North Island. Combined, our members are responsible for employing around 25% of the country's workforce.

We are the unapologetic voice of the business community, advocating strongly on behalf of our members and the wider business community to ensure their voices are heard by government and decision-makers. In collaboration with our nationwide network, including BusinessNZ, Business Central, Business Canterbury and Business South, we represent and support over 76,000 member companies.

As a not-for-profit association, we provide trusted, expert and affordable advice to our members. Delivering a wide range of services, including learning and training courses, health and safety advice, employment support, and HR and PX services, we support our members to upskill and build capability in their teams.

More broadly, we aim to create an ecosystem of support for all businesses in New Zealand, enabling them, their people and their communities to prosper.

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Introduction and overall comments

Thank you for the opportunity to give feedback on the draft integrated quality assurance framework (iQAF).

The draft framework has the potential to provide a system that encourages ownership and innovation by tertiary education organisations (TEOs) to both give assurance to learners that they can access quality and relevant qualifications and credentials and provide employers with the skills and capability they need to be competitive.

An element of the proposed structure is already in place and in general working well, with three out of the four quality assurance cornerstones essentially what is already happening with the new element being the TEO ownership of quality and quality improvement. However, the success of the framework will be determined by the detail of how all the elements are to be applied.

An important consideration will be what are appropriate expectations around the size and scale of annual self-assessment conversations between TEOs and the New Zealand Qualifications Authority (NZQA) and does NZQA have capability to deliver this for hundreds of TEO's across New Zealand.

It is good to see the significance given to the use of data, insights, and monitoring across the system. If this is provided to TEO's both on an industry wide and individual basis, with full transparency and live in real-time, this intelligence could support continual innovation and improvement and achieve better outcomes for all stakeholders.

There is also the question of what the reform of vocational education and training will look like and where the functions of the Workforce Development Councils (WDCs) will sit that may impact on the system. This is yet to be determined but will impact the iQAF.

Further details and information are needed around rules, tools and processes to evaluate if this framework will be successful in application, as this is where much of the complexity and compliance cost will become evident.

Questions:

iQAF components

1. Do the four cornerstones describe the important elements of quality assurance? What would you change or add?

Yes, this draft integrated quality assurance framework (iQAF) covers most important elements of quality assurance but further information regarding self-assessment would be helpful. It

also provides a high-level guide to roles and responsibilities i.e. Tertiary Education Organisations (TEOs) have ‘ownership of quality and quality improvement’. It outlines the enablers which build on the quality assurance cornerstones and indicates how the regulatory levers will be integrated into the new model.

With **a number of the proposed framework elements already in place** the success of the new cornerstone will depend significantly on the detailed provisions of its structure which have yet to be revealed.

NZQA should provide mechanisms and tools/ resources to support the information and data requests required from TEOs. This will provide clarity for the TEOs and give the NZQA the information they require. In addition, on-going implementation support for TEOs, from NZQA would be valued.

Quality assurance (QA) and regulation needs will change into the future as providers need to respond to learner and industry needs, how will this model support thought-leadership on future QA and regulation needed?

2. Do you think the proposed enablers will be effective in supporting the overall quality assurance approach? What would you change or add?

The proposed enablers will provide effective support for quality assurance but will require clarity of expectations and delivery processes and implementation, plus mechanisms of support for TEOs to utilise ensuring they get positive outcomes for all parties and develop something that can be shared across the network.

Data and insights

It is good to see the importance of data and insights to drive results in the new framework as this **can provide information and future predictions/ trends to ensure better outcomes for all stakeholders alike**. We would recommend seeking both quantitative and qualitative insights across stakeholders as some commentary may reveal trends/issues before it shows in data.

It will be important to have a strong focus collectively where NZQA works with the other involved stakeholders, on targeted interventions i.e. priority group enhancement, support, and outcomes. Reviews of key strategic themes will provide valuable data on overall performance, but they may not effectively highlight regional opportunity or address local issues or challenges. Data and insights should also assist in shaping policy decisions and drive quality assurance processes.

The **quality and integrity of this data will be crucial** to how well it will be able to be used by stakeholders.

Risk informed approach

Further detail is required here regarding how the types of risks will enable and enhance the quality assurance system. This requires further discussion and clarification. A risk-informed approach **should also include financial risk and/ or sustainability**, and transparency around types of risks and responses is important and good to see included.

Respectful and collaborative relationships

This is a great aim, but these relationships will ultimately be built on trust and added value, and take time and clear action/follow-through. To ensure all parties including businesses and employers understand the changes we must ensure a clear, concise, and easy to understand communications and implementation plan is developed and applied across the network, with little to no jargon.

If the annual TEO conversation is focused on reviewing progress annually, analysing key strategic focus points, and seeking further development opportunities then this will certainly help build trust and further strengthen relationships.

The idea of a **national CRM is a particularly good idea**. This should be easily accessed by each TEO to help inform and improve delivery, learner outcomes, and practice.

3. Do you think the proposed activities under ‘Set Rules’ will help TEOs get things right the first time? What you change or add?

Yes, the proposed activities under ‘Set Rules’ do seem like they’ll help TEOs get things right. Many of these elements are already set by policy.

The definition of what ‘peer reviewing’ of NZQA’s services entails should be spelled out more. **Ideally this would be undertaken by an independent party**. This will provide trust, rigor, authenticity, and reliability of results for TEOs.

NZQA providing guidance to TEOs to help understand policy intent, rules, and regulations is a robust idea as is NZQA developing templates, checklists, and providing examples of great practice.

4. Do you think the proposed activities for ‘Educate and inform’ will contribute to TEO capability? What would you change or add?

Yes, these activities will support TEO capability, as it will help them understand policy settings and regulation requirements better.

TEOs must be able to gain access to their own information, held by NZQA, so that they can monitor performance and see trend data and information. This will help improve practice and establish standards, targets etc.

The effectiveness of improvements from using this data relies on the quality of data inputs and translation for TEOs.

5. Do you think the proposed activities under ‘Approve’ could drive more effective and efficient processes? Do you have other suggestions?

Yes, it is pleasing to note that providers with a proven history of compliance and current capability will not need to apply for consent to assess, or accreditation for new programmes or micro-credentials, within a subject or topic they already have accreditation for, provided there is sufficient evidence of the provider’s ongoing capability.

In addition, with the skill and knowledge requirements of workers changing faster than ever, the changes proposed should **enable an environment where providers can quickly pivot into new and emerging domains of learning** to provide in-time education solutions.

Approving the listing of qualifications, microcredentials, and standards must be done in a timely and responsive manner. There need to be **fast, efficient, and easy processes to follow**, otherwise it may result in TEOs being too slow to respond to business needs, new and developing opportunities etc. A fast-track approval process for high-performing TEOs is encouraged.

There is a question of whether the approval of PTES will be demand driven i.e. help bolster the need for future workforce needs, preferably being informed by regional needs/ skills forecasts etc.

We believe that **PTEs should be able to demonstrate what mix of provision they are proposing, and why**. This will ensure demand/community/ workforce development needs are met and that provision decisions are well-informed.

TEO ownership of quality and quality improvement

6. What should be included in a succinct self-review report to assist with a TEO’s reflection and ensure the self-review is authentic?

There needs to be more clarity around the crucial point of who sets the criteria in the “NZQA template” for the annual self-review. What stakeholders will be included in setting these criteria, how are the key areas of review identified each year, and what the criteria will be used to decide these will be important questions that need clear answers.

TEOs should be required to produce evidence in support of their annual review, for priority areas/ annual key self-evaluative questions. However, **evidence required should be appropriate and not overly cumbersome** for TEOs to regularly provide and should avoid duplication. Involvement and consultation should be undertaken with industry around what’s required to be provided.

Suggested areas for the self-assessment include, but not limited to:

- Learner wellbeing and support (Pastoral Care Code?).
- Teaching, learning and assessment.
- Learner completion and success/ educational performance indicators.
- Graduate outcomes.
- Industry feedback.
- Management/governance.

7. Do you like the idea of an annual discussion with NZQA based on a TEO's action plan? Please give your reasons.

Yes, introducing annual discussions is an encouraging step provided the preparation for, and duration of, the discussion is not cost- nor time-prohibitive, nor unnecessarily arduous. NZQA needs to think about timing around the discussion and how much resource and capacity will be needed by TEOs to provide the required data and information. How will it be ensured that these annual discussions and action plans do not become audits and mini-EERs every year as many TEO's will not have capacity/capability to do this.

What the process looks like for different sized TEOs is also critical to think about as these annual discussions could become an exceptionally large annual programme of work for large, complex TEOs.

It is important that the NZQA representative(s) remain the TEO point of contact for successive years where possible. The benefit of the NZQA representative already understanding the TEO's market and business model cannot be understated.

Annual discussion with the TEO's focusing on their annual plan will help build collaboration and a better understanding of what the TEO is focusing on, how, and why. This may well be very time-consuming for NZQA to have a conversation with every TEO, every year. Whether NZQA has the capacity and expertise to undertake such yearly engagement should be considered realistically.

It would be helpful for NZQA to provide an optional template for action planning to TEOs. This will provide consistency and improved understanding of what NZQA is looking for in this process.

8. Do you support a shift to more targeted, risk-informed monitoring supported by periodic monitoring? Please give your reasons.

Yes, if there is an agreed schedule of monitoring time frames, and evidence requirements, how they need to be presented and what success looks like is clear and well-communicated. It would be helpful for NZQA to provide an optional template for this also.

It is hard to evaluate this section properly while the rules and operational details are unclear.

Right sizing of monitoring activity for different sized TEOs is already in place and should continue to ensure compliance activity is appropriate. TEOs will still need to be involved in the discussion around choosing which of the TEO's programmes will be monitored.

We support having a real time live data view of performance that's transparently shared with TEOs to enable them to more accurately see their results and respond quickly.

With the removal of the EER Statements of Confidence and the overall statement of organisational performance, it should be examined if this would drive behavioural change in a negative way.

9. Do you consider that the proposed integrated monitoring activities are sufficient to give confidence about a provider's performance, without category ratings? Please give your reasons.

The integrated monitoring activities appear suitable and appropriate, but we would suggest further discussion needs to occur regarding the removal of any type of category ratings.

Removing category ratings leads to questions around subsequent flow on impacts such as a TEO's ability to enrol international students, unlock TEC and targeted funding arrangements etc. What impact will this decision have on business and employers? Are employers, and potentially future learners, seeking category ratings (or something similar)? The benefits that Category 1 providers currently receive inspire Category 2 providers to continually improve their approach so will similar incentives exist under the iQAF?

More work and consultation should be done here to understand the full implications of removing categories.

10. Do you think the proposed risk-informed approach to managing compliance and applying interventions will be effective? What would you change or add?

Yes, the approach seems appropriate.

System assurance

11. To what extent do you think these activities will be effective in supporting system performance and improvement?

We are **very supportive of the idea that NZQA, TEOs, and others share data and insights** to better understand and improve the system performance and promote excellence and innovation. This information should be readily available, up to date, and informative so that it helps to inform annual plans and focus areas for development and/ or improvement.

It is important that NZQA and other related parties continue to remove qualification and programme duplication, to simplify things for the learner and those employing graduates etc.

Identification of themes, results, trends, and results across the network by NZQA is a strong idea. Sharing these trends will help TEOs build their understanding, capability, capacity, and inform annual action planning processes. Regular exchange of information also supports a better understanding of sector performance to enable TEOs to make informed decisions while maintaining a consistent approach to system improvement.

Conclusion

Thank you for the opportunity to comment on the draft integrated quality assurance framework (iQAF). We welcome any questions and look forward to engaging further in this process.