

10 December 2024

Consultation on NZQA's draft integrated quality assurance framework

We are pleased to provide comment on the draft integrated quality assurance framework (iQAF).

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand (Te Rito Maioha) is an Incorporated Society of members committed to high quality early childhood education for every child. Established in 1963, the organisation is an influential leader in shaping today's early childhood sector through advocacy, policy, tertiary education qualifications and professional development programmes.

We advocate for early childhood education services and the teachers | kaiako who provide education to thousands of infants, toddlers, and children | tamariki. Our members are drawn from a diverse range of community-based, privately-owned, kindergarten and homebased early childhood education services.

Te Rito Maioha is also a registered Private Training Establishment (PTE) with the highest Category One rating for a tertiary provider. We are accredited and approved by New Zealand Qualifications Authority (NZQA) to deliver a range of undergraduate, graduate, and postgraduate qualifications (levels 4-9), including specialist teacher | kaiako education, both nationally and internationally.

We are committed to achieving high-quality teaching and learning by:

- increasing teachers' | kaiako knowledge of Te Tiriti o Waitangi and Aotearoa New Zealand's dual cultural heritage;
- providing access to online blended delivery of undergraduate, graduate, and postgraduate tertiary education programmes leading to recognised and approved qualifications;
- promoting quality teaching and leadership through ongoing professional learning and development programmes;
- providing a range of unique resources and services to our members.

Quality assurance

We welcome this review of NZQA's quality assurance framework. Robust quality assurance is imperative to lift and maintain the reputation of New Zealand's education system, giving our qualifications credibility nationally and internationally. The ideal outcome would be a high-trust model that gives NZQA the necessary trust and confidence in our processes and quality, while reducing the burden of compliance on TEOs.

iQAF: annual self-review

The iQAF seems to be an opportunity to better utilise the available data and insights to inform NZQA's confidence in individual TEOs and the sector as a whole. This would mean a more effective and holistic approach that reduces compliance on the sector. We are confident we can demonstrate the effectiveness of our quality management system and how we comply with the Education and Training Act 2020, NZQA rules, and the Code.



The iQAF and consultation document lacks specific details, so we are keen to understand what the annual self-review will entail, and how this differs from existing requirements.

We currently provide evidence of a self-review every 4 years, whereas the iQAF expects this annually. At face value, this change risks increasing TEOs workload and compliance. We wonder if the annual self-review could be for new TEOs, for their first five years of operation, or until they have satisfactorily demonstrated good processes, full compliance and gained your confidence? From that point, could a less-frequent review be considered, such as biennial? This would support a risk-informed approach and reward high-performing TEOs.

Moving from a 4-yearly process to an annual one also has implications on our workload and we will need to plan accordingly. What will the annual timeline be for quality assurance? Including the existing annual attestation for the pastoral care code self-review with the proposed self-review suggests this will need to be submitted before the beginning of each year. All TEO submissions can't be due at the same time, as it will create a bottleneck of work for NZQA to review and respond to each TEO in a timely way.

Duplication and compliance

Our biggest frustration with quality assurance is the weight and duplication of compliance. This is two-fold. We have experienced duplication within NZQA processes – for example, providing letters back to you that NZQA originally issued. The second is having to provide the same information in a different format to different agencies to comply with each agency's requirements. For example, we provide the Teaching Council of Aotearoa New Zealand (TCANZ) with monitoring reports, and NZQA with Annual Programme Evaluation Reports for self-monitored programmes when these reports are mostly the same or similar in nature.

Under **Exchange information** and **Share insights**, your proposal describes sharing information and insights with different agencies to gain a broader understanding of TEO and sector performance, and to better disseminate information about trends, best practice, and issues. TEOs will then avoid supplying data multiple times and reduce our compliance costs. If achieved, this will be extremely positive for all parties.

In developing the iQAF, there is a real opportunity for NZQA to maximise data-sharing, leveraging what information, insights, and data is already available, and avoid duplication wherever possible. We are willing to work with you to gain a shared understanding of what information is readily available to be leveraged, what different agencies we work with and what information we submit to them. Has NZQA liaised with other agencies and professional standard setting bodies in developing the iQAF to gain insights into their processes and what information and data is available?

Teaching Council of Aotearoa New Zealand

Albeit a key relationship, NZQA are one of many agencies we engage with regarding the content and quality of our qualifications. As an initial teacher education (ITE) provider, we also work closely with TCANZ who approve, monitor, and review our ITE programmes. These are rigorous processes to ensure graduate teachers meet the same standards on their journey to become fully registered and certified to teach. We draw your attention to key TCANZ documents (linked below) and encourage you to engage with both the documents and with TCANZ directly, to understand their robust processes:



[Changes to the ITE Programme Requirements policy](#)

[Initial Teacher Education 2023 Interim Monitoring Guide](#)

[ITE Programme Approval, Monitoring, Review, and Moderation Policy](#)

TCANZ's role is broader than many other professional bodies, as they are involved in teaching and education (as above, approving, monitoring and reviewing ITE programmes) and the teaching profession (including teacher competence, conduct, discipline, and professional growth), not just professional registration once a student has completed their studies and is ready to enter the profession.

While some overlap is to be expected for us to give both NZQA and TCANZ confidence in our processes and qualifications, any unnecessary duplication should be avoided. We have advocated to both TCANZ and NZQA to this end. We appreciate the recommendation that monitoring will be reduced, however this needs to align with TCANZ (and other relevant bodies') monitoring requirements.

Programme monitoring

We understand that the iQAF will reduce programme monitoring and welcome this. Currently, all programmes at level 7 and above are either NZQA monitored or self-monitored. We need clarity on what proportion of programmes will be monitored each year, and what at risk-informed approach looks like in practice.

Would the existing Monitor and Annual Programme Evaluation Reports suffice for self-review as these cover the majority of our offerings (acknowledging we have a small number of taurira enrolled in level 5 programmes), or do NZQA envisage something different? It would be helpful to know what elements of our existing reports are useful and what is superfluous, so we only provide what is needed.

Could the five yearly programme review process, in addition to the existing annual monitoring process, suffice from a quality assurance perspective as opposed to introducing another quality assurance mechanism in the form of an annual self-review report? Again, understanding what NZQA find most useful in our existing processes and reporting will help inform what to keep and what to refine, under a new framework.

NZQA engagement

Your consultation document states NZQA's role is to support TEOs to comply with NZQA rules, using its levers proportionally when there is ongoing non-compliance. This is a promising message about how we might work together in a more collaborative way, going forward.

We enjoy a positive relationship with our current NZQA contacts and have initiated 6-weekly meetings. We value this relationship and regular engagement as they help us to understand NZQA initiatives and developments and we also support NZQA with their developments.

There is an element of frustration, as despite these strong relationships and subscription to the eQuate newsletter, we still find ourselves out of the loop, such as when documents are published on NZQA's website without our knowledge (an example is the finalised version of degree guidelines).



The proposed annual discussion with NZQA on our self-review and action plan is a positive, as this will give us the opportunity to speak to our approach and demonstrate our processes in a different way. This moves away from a more 'tick-box' approach to a high-trust, relational framework. Will the 'designated NZQA contact' be someone new, or our existing point of contact? How will you ensure consistency and transparency in the process? NZQA needs the capability to analyse the information TEOs submit and provide via discussion for it to truly be effective.

Communication is an important component that will determine whether TEOs get things right the first time. Positive and constructive relationships are essential to establishing a high trust iQAF.

Effective verification of TEO quality: category ratings

We want to understand the rationale for removing the category ratings from the current framework.

As a PTE with a long-standing Category 1 rating, we value the transparency and credibility of the current system, and proudly refer to our Category 1 rating in our marketing. Whilst we acknowledge this is not the intended purpose of NZQA allocated categories we, like many TEOs, find it is a very useful tool and that both domestic and international taura feel assured of our quality with this NZQA 'stamp of approval' on our website.

There are challenges with public perception, as the existing category ratings give an indication of TEO quality. Without these ratings how will external parties, including prospective taura, make a judgement about TEO quality? The category ratings are a key factor in taura decision-making, especially for international students. Such transparency and consistency supports a learner-centric approach.

The current category ratings can be likened to international university rankings that give external parties (particularly prospective taura) confidence in a TEO's standing, and which the universities proudly point to. There *is* an element of competition between TEOs.

Moving away from category ratings, the iQAF seems to only satisfy NZQA's confidence in a TEO. How will this information be shared externally, so the public can also have confidence in a TEO and inform their decision-making when considering study options? The argument that "*prospective learners should have a high level of confidence that they can expect a quality learning experience at any education provider formally recognised in New Zealand's education system*" is fair, but in reality, the quality for those TEOs *not* requiring intervention varies from bare minimum compliance to exemplary practice. How will NZQA differentiate between high quality versus lower quality providers, and will this be shared externally?

General comments and questions to be considered...

- The iQAF consultation document is at a high level and lacks sufficient detail to determine if activities will be effective in supporting system performance and improvement. We look forward to further consultation to develop and inform this detail to ensure a quality assurance framework that is fit for purpose and not overly burdensome on TEOs.
- Keeping learners at the centre of the iQAF – to ensure they achieve robust, credible, and relevant qualifications and credentials – is positive. The entire tertiary education system should have learners at the centre, no matter how far-removed various agencies are from them.



- We understand that NZQA fees will be reviewed once a framework has been confirmed, and you will consult the sector around proposed fees.

An advantage will be avoiding the four yearly cost associated with an EER, which is particularly significant (approximately \$30-40k) for ourselves and other providers who prefer kanohi ki te kanohi. Removing, or at least reducing, this cost will be a positive outcome.

There is also a risk that moving to an annual self-review and attestation could increase costs for us. We hope for lower fees and more consistency and transparency from year to year. The move to a consistent annual fee is more appealing and easier for budgeting than being hit with the significant cost of EER every four years.

- Delving into one or more themes as part of each annual review is an opportunity to gain great insights and learnings across the sector. We caveat this with a plea for NZQA to provide sufficient notice, so the themed reviews are not too onerous on the sector. Communication and engagement are key here.
- The iQAF cornerstone of TEOs owning our quality and quality processes is sound and we welcome a high-trust model. We have robust processes and know we can demonstrate this to maintain your confidence in us. We are starting in a good position, as a mature organisation, with sound quality assurance processes and a long-standing Category 1 rating, and positive, trusted relationships with NZQA, TEC, and TCANZ.

Make submission to QAFredesign@nzqa.govt.nz by 10 December.

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