

23 September 2025

## Consultation on the final design of the integrated Quality Assurance Framework

We are pleased to provide comment to the New Zealand Qualifications Authority (NZQA) on the final design of the integrated Quality Assurance Framework (iQAF).

### About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha is an Incorporated Society of members committed to high quality early education for every child. Established in 1963, we are an influential leader in shaping today's early childhood sector through advocacy, policy, and delivering tertiary education qualifications and professional development programmes for current and future early childhood and primary education teachers.

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

Te Rito Maioha is a registered Private Training Establishment (PTE) with the highest rating for a tertiary provider in Aotearoa New Zealand. We are accredited and approved by the New Zealand Qualifications Authority (NZQA) to deliver a range of early childhood and primary school undergraduate, graduate, and postgraduate qualifications (levels 5-9), including specialist 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 blended delivery through online and face-to-face, with practical real-life exposure and experiences through research informed 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 advocacy and a range of unique resources and services to our early childhood education members.
- collaborating with New Zealand and international partnerships to strengthen research and teacher education.



## Consultation questions

### Part One – iQAF levers and activities

**Question 1. Do you agree with the proposals to simplify approval and accreditation processes? If not, what would you change?**

- We support changes that simplify the current approval and accreditation processes.
- As an initial teacher education (ITE) provider, we work closely with both NZQA and the Teaching Council of Aotearoa New Zealand (TCANZ), providing both with programme reporting. The level of effort and compliance is frustrating, and we have advocated over many years for NZQA and TCANZ to collaborate and avoid unnecessary duplication. We welcome NZQA's plan to "use information in our system to reduce the need for multiple requests for the same information or for information held by other education agencies". We currently submit a report annually to TCANZ for our ITE programmes and understand that, going forward, NZQA will access information held by TCANZ. This is a welcome change to ease our compliance reporting. There will surely be other examples of duplication that can be streamlined through better use of existing reporting, data and insights.
- The consultation document notes "For TEOs with a positive compliance and performance history, and evidence of ongoing capability in a particular subject or topic, we will streamline accreditation processes for micro-credentials and programmes within that subject or field", which we hope benefits us. We work hard to develop and deliver quality, research informed programmes and are committed to continual improvement. We enjoy our positive and trusted working relationship with NZQA and hope this holds us in good stead, as we move from the EER to the iQAF.
- As this will be a new process, and quite a significant shift, examples of good practice, webinars, and other support NZQA provide are welcome to ensure a successful and smooth implementation.

**Question 2. Do you agree with the proposed self-review process? If not, what would you change?**

- The proposed self-review process risks becoming a mini EER without clear parameters for the self-review report. The annual self-review and conversation appear quite cumbersome, so we are curious to see how they work in practice. Is there a proposed length for the self-review report? NZQA has provided a template, however with 12 programmes, there is potential for the self-review process to be more work than the current NZQA self-review processes. Please ensure templates and expectations are clear to ensure TEOs provide the information required rather than excessively long reports.
- The self-review will need to align with TCANZ requirements. Have NZQA worked with them to ensure their comfort with this level of review?
- The annual conversation needs to be at a lower level, not with the CE but more with TEO Academic and Programme leaders.
- We are not in favour of the complaints and critical incidents sitting on the NZQA's website and available for the public. Surely there are confidentiality and privacy issues with this? Will there be a threshold for what level of complaint or incident warrants such public reporting?
- The idea of a submission and engagement schedule is good, as long as this is confirmed well in advance.
- Will the annual conversation be kanohi ki te kanohi or virtual? Does NZQA have the capacity and capability to facilitate these annual TEO conversations? It is essential that NZQA staff have the capability and sector understanding for the annual conversation to be effective and to achieve what the iQAF changes intend.

- It is important that the timing and cost of the annual conversation is confirmed in advance, because we typically set our annual plan and our budgets in September.

***Question 3. Do you agree with the proposed approach to monitoring degrees, graduate certificates and diplomas, and postgraduate qualifications? If not, what would you change?***

NZQA plans to “publish tertiary evaluation (quality) indicators along with other guidance to provide examples of good education performance”. This is EER language and as noted above, there is a risk that education performance monitoring will be replaced by a mini-EER process.

Whilst the frequency of programme monitoring is reduced with the new iQAF self-review, TEOs must provide summary reports and quality improvement plans annually. Again, this risks being an annual mini-EER (instead of three-yearly).

***Question 4. Do you agree with the proposed approach to monitoring programmes leading to sub-degree qualifications at Levels 1-7? If not, what would you change?***

The frequency and depth of monitoring these programmes is informed by risk assessment. What will this entail, and what will be considered? Is the maximum or default that they will be monitored ‘within’ a five-year period?

The self-review summary report process for TEOs with sub-degree and degree level accreditation and programme approval is positive for us, as a TEO delivering at both levels.

***Question 5. Do you agree with the proposed approach to monitoring microcredentials? If not, what would you change?***

It would be interesting to hear more detail about what the moderation of assessments will comprise.

***Question 6. Do you think the combination of compliance monitoring and education performance monitoring will provide sufficient assurance of an organisation’s overall capability to deliver high quality education? If not, what would you change?***

This seems an increased compliance burden for TEOs with increased cost. What organisational re-design and support will be provided from NZQA to support TEOs to achieve these changes?

**Part Two – Proposed rules changes**

***Question 7. Do you have any comments or suggestions for the proposed changes to review periods for qualifications, micro-credentials and standards?***

Monitoring existing degree programmes on a three-year cycle is a positive move.

***Question 8. Do you have any comments or suggestions for the proposed Rules changes to support streamlining approval processes?***

We support the proposal to streamline accreditation processes for TEOs with a positive compliance and performance history. We also support that TEOs with capability in a particular subject or topic to have streamlined micro-credential and programme processes in that subject or field.

Type 1 and Type 2 change definitions and minor and major change definitions and processes across these agencies vary, which is frustrating and confusing.



***Question 10. Do you have any comments or suggestions in relation to the purpose or scope of the Quality Assurance Rules?***

There is a risk that thematic reviews will be undertaken with methodological processes. Does NZQA have the research capability and capacity to undertake reviews in a robust way? There is some learning from critique of ERO evaluation reports that will need to be applied before NZQA engages in thematic review. In addition, the type of questions and how TEOs interpret these, especially in a compliance capacity, needs to be considered in NZQA analysis.

***Question 14. Do you agree with the proposal to increase the student fees exemption to \$1000 (GST inc)? If not, please provide your reasons.***

Yes, we agree with increasing the student fees exemption to \$1000.

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Make submission to [QAFredesign@nzqa.govt.nz](mailto:QAFredesign@nzqa.govt.nz) by 26 September 2025.

Key contact for Te Rito Maioha Early Childhood New Zealand: Kathy Wolfe, Chief Executive

