



TEU

TERTIARY EDUCATION UNION
TE HAUTŪ KAHURANGI

Submission of

**Te Hautū Kahurangi | Tertiary Education
Union**

to the

New Zealand Qualifications Authority

on the

***Consultation on Simplifying New Zealand
Qualifications and Other Credentials***

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1. Introduction

- 1.1. Te Hautū Kahurangi | Tertiary Education Union (TEU) welcomes this opportunity to respond to the New Zealand Qualification Authority's *Consultation on Simplifying New Zealand Qualifications and Other Credentials*.
- 1.2. The TEU is the largest union and professional association representing 10,000 academic and general/allied staff in the tertiary education sector (in universities, institutes of technology/polytechnics, wānanga, private training establishments, and rural education activities programmes).
- 1.3. The TEU actively acknowledges Te Tiriti o Waitangi as the foundation for the relationship between Māori and the Crown. We recognise the significance of specific reference to Te Tiriti o Waitangi in the Education Act and the emergent discourse resulting from this. We also accept the responsibilities and actions that result from our nation's signing of the UN Declaration on the Rights of Indigenous Peoples.
- 1.4. The TEU expresses its commitment to Te Tiriti o Waitangi by working to apply the four whāinga (values) from our *Te Koeke Tiriti* framework as a means to advance our TEU Tiriti relationship in all our work and decision-making – with members and when engaging on broader issues within the tertiary sector and beyond – such as our response to the *Consultation on Simplifying New Zealand Qualifications and Other Credentials*:

Tū kotahi, tū kaha: We are strong and unified; we are committed to actions which will leave no-one behind; we create spaces where all people can fully participate, are fairly represented, and that foster good relationships between people.

Ngā piki, ngā heke: We endure through good times and bad; we work to minimise our impact on the environment; we foster ahikā – the interrelationship of people and the land, including supporting tūrangawaewae – a place where each has the right to stand and belong.

Awahi atu, awahi mai: We take actions that seek to improve the lives of the most vulnerable; we give and receive, acknowledging that reciprocity is fundamental to strong and equitable relationships; and we work to advance approaches that ensure quality public tertiary education for all.

Tātou, tātou e: We reach our goals through our collective strength and shared sense of purpose, which are supported through participatory democratic decision-making processes and structures.

- 1.5. Our response to the *Consultation on Simplifying New Zealand Qualifications and Other Credentials* stems from our commitment to the whāinga expressed above and our wish to see these enacted in the tertiary education sector and in our society and communities.
- 1.6. As indicated by the headings throughout our submission, we respond in turn to each section of the consultation document.
- 1.7. We would like to acknowledge and thank all the TEU members and staff that provided input on this submission.
- 1.8. While TEU supports the principle of simplifying qualifications and other credentials, we have real concerns about the lack of the educator's voice in these proposals. Indeed, the prioritisation of employers and industry in the consultation material seems to marginalise learners and communities are hardly mentioned. The focus of the Tertiary Education Strategy is that learners should be at the centre. The majority of the cost of education and qualifications is paid for by taxpayers in the knowledge that it improves the lives of individuals and whānau but also because it contributes to social good. Hence, educators must have significant input alongside industry and employers and co-design, of curricula, qualifications, and micro-credentials is imperative.
- 1.9. We largely support option B and micro-credentials replacing training schemes. However, there must be mechanisms in place to ensure adequate educator input and the learner and community perspectives. We do not support WDCs developing micro-credentials and believe that this would create duplication, disconnection and credibility risks. Any and all materials, qualifications, skill standards and micro-credentials must reflect Te Tiriti o Waitangi.

2. HE KUPU WHAKATAKI | INTRODUCTION

- 2.1. Where the 'NZQF level descriptors' section on page 5 refers to three transferable competencies including "reflect vocational training through the inclusion of practical skills," we think this should more clearly reflect that the competencies should be core to the practical skills that are the essence of vocational education.
- 2.2. Where the "Skills standards' section on page 5 states that "NZQA is working with experts [...]," we think there could be an elaboration on the types of experts this will involve – i.e. will this include academic as well as content experts?

3. HE WHAKAMĀRAMA | BACKGROUND

- 3.1. The consultation document notes that WDCs will "set a vision for the skills and training needs for the workforce, set standards, develop qualifications and shape the curriculum, and advise on investment in vocational education,"

It is of great concern that educationalists are not part of WDCs as they are a significant collaborative partner in the reform of vocational education. At a RoVE forum (4 May 2021) the RoVE Director 'stated categorically that there will be no educators in the WDC' – this is a significant concern, especially as WDCs are responsible for controlling educational outcomes.

4. NGĀ WHAKATAKOTORANGA | PROPOSAL 1

4.1 Consultation question 1.1

Members are broadly supportive of Option B because it will, once fully implemented, provide a simplified system that should enable enhanced regional delivery and easier learner movement. Our major areas of concern include:

- That any or all national curricula must be based in and reflect Te Tiriti o Waitangi.
- That the development of national curricula must be a truly collaborative and co-design process, from beginning to end, that includes experienced educators with sector experience and learner input. .

That all qualification developers must engage with all stakeholders, including educators and learners.

- That there is a strong educational lens and consideration of social good in all content, including issues of sustainability and societal transformation.
- That all national curricula are grounded in transferrable competencies.
- All national curricula must include enough flexibility to enable educators to meet the needs of diverse populations of learners and the specific needs of different regions e.g. areas where there are large populations of Māori or Pasifika learners will need differing content and teaching approaches. Also, courses such as tourism will need to reflect a regional focus, e.g. alpine tourism.
- For Option B to be successful there needs to be adequate resourcing, including dedicated funding and adequate time to ensure that co-design can be fully inclusive of all stakeholders. It is envisaged that this would be “an evolution not a revolution”.

4.2 Consultation question 1.2

For Option A to be successful:

- Programme development must be a collaborative process including all stakeholders.
- There needs to be specific funding to enable innovation, collaboration and co-design of programmes to occur in a timely fashion.
- WDC’s processes for endorsing programmes need be transparent and simple with minimal compliance prior to NZQA approval to enable timely responses.
- External moderation processes need to bring together educators with industry representatives with a focus on continuous quality improvement (CQI) and effective feedback loops to ensure improvements are implemented.

4.2a *Qualifications*

With WDCs taking over the responsibility of developing and maintaining qualifications there must be mechanisms in place to ensure there is adequate educator input as well as a learner perspective.

The risk is that industry will take a short-term view of what is required in qualifications and curricula and that educational and societal perspectives, such as a Te Tiriti focus, the environment/natural resources, and considerations of sustainability and transformation, may not be included.

Also, mechanisms need to be in place to ensure the perspectives from employers or smaller businesses who have not felt included by the ITOs, are included.

4.2b *Programmes*

As WDCs will have a role in endorsing provider-developed programmes before NZQA grants approval, they must not be able to unreasonably constrain the number of programme offerings. Constraint on programmes could seriously impact specifically what is offered in the regions.

Given WDCs have a role in endorsing programmes developed by providers before NZQA approval, it is important that endorsement processes are transparent and have minimal compliance requirements additional to what are required by NZQA for approval.

It is expected that providers would naturally engage with WDCs in the development of new programmes or national curriculum. But this document does not clearly state that WDCs will actively seek collaboration with providers in programme development. Currently in the ITP sector it is mandatory to show that when developing and/or redeveloping programmes that industry stakeholders have been included as part of the consultation process. There should be a requirement for WDCs to show that they have collaborated and engaged with providers.

4.2c *Skill standards*

It is essential that skill standards do not dominate teaching as unit standards have. Previously, it may be argued qualifications did not specify content because of the way unit standards were written. Rather than a holistic perspective, content became what needed to be assessed. Often the assessment and compliance loads were so high, a check box approach to qualifications was developed.

It is acknowledged that skill standards will be more comprehensive than unit standards but what is not clear is if these skill standards will be co-designed with experienced educators. As Te Pūkenga will be required by legislation to use skill standards, they must be educationally credible and accepted by educators. Hence, the importance of educator input in their development.

4.2d *Training schemes and micro-credentials*

The replacement of training schemes by micro-credentials is supported with specific concerns.

Micro-credentials could be created in a timelier fashion, but they must be co-designed with educators.

Clear parameters need to be provided on how micro-credentials may be “stackable”. What levels micro-credentials will be at also needs to be clearly identified. It is expected that they would not go above level 3 or 4 for a small piece of learning.

We agree that providers can develop micro-credentials and that only providers can deliver and assess them.

4.3 Consultation question 1.3

As clearly stated in the submission so far, WDC’s must collaborate with providers and ensure that educators are involved in the co-design of educational outputs.

The development of national curriculum or core content must be done by a co-design process with educators and providers. The perspectives of Iwi and students as well as educators and industry must be included.

Adequate resourcing must be provided to support time release and the development of quality academic parameters.

Collaboration and co-design must be transparent processes and well resourced.

National curricula should define the core content of qualification, not how it is to be delivered. The Education and Training Act 2020 ensures that academic freedom is upheld (S318) for Te Pūkenga and this should apply to all providers.

Staff must have the academic freedom to regulate the subject matter of courses and the academic freedom to teach and assess students in a way that best promotes learning.

4.4 Consultation question 1.4

Non-WDC developed qualifications should also be developed by a similar co-design process that involves educators and providers and that includes the perspectives of Iwi and students.

4.5 Consultation question 1.5

The impact on TEU members of Option B is that it would increase workloads in its development but there is the potential to reduce compliance load in the longer term. This development needs to be evolutionary, not revolutionary, and adequately resourced with time release or dedicated work teams so that quality is maintained.

4.6 Consultation question 1.6

As above, it would be a lot of work initially ensuring that national curricula were genuinely co-designed. However, as Te Pūkenga is in a process of consolidating qualifications, there is potential to combine or learn from that process.

A potential challenge is fear and non-engagement or non-acceptance by staff, Iwi or learners, but should be mitigated by genuine co-design.

A further challenge is to have an agreed amount of flexibility, either by region specific papers or credits, to enable the needs of specific populations or regions to be met.

4.7 Consultation question 1.7

Already identified, Option B would provide an additional layer of change and increased workloads for educators and providers at a time of significant change.

There may need to be transition processes as programmes phase out and the national curricula are rolled out. This may also provide challenges for student management systems that are currently considerable in number and not unified systems across the sector and that need to load programme or qualification details up to 15 months in advance.

However, it should make it easier for students to move across the sector and this should be trackable.

4.8 Consultation question 1.8

Risks have mainly been identified as above.

The major risks are:

1. that there will not be sufficient educator input,
2. the work is 'on top of' existing work which will compromise quality, or
3. that there is not genuine co-design that includes all perspectives.

A major concern by educators is that the development of a national curricula will reduce their academic freedom to teach in a way that meets the needs of specific populations of learners, regional needs, or academic and professional priorities. Educators do not want "a lesson in a box" where they have little control over content and assessment.

4.9 Consultation question 1.9

Anticipated costs include that change must be adequately funded and resourced with staff, time, and additional resources.

It is important that a range of educational expertise is included, such as instructional designers / IT educational experts, to ensure national curricula are developed for work-based and provider-based learners.

Hence, multiple expertise as well as multiple perspectives needed in co-design will have associated costs.

4.10 Consultation question 1.10

With national curricula, external moderation should be an annual time where representatives of all providers and industry should come together to not only undertake the external moderation but also to share resources and to discuss the developments in the field. Such quality improvement initiatives would increase collaboration and quality and support curricula being up to date.

4.11 Consultation question 1.11

Overall, we support Option B, subject to the comments above.

Processes to update or change national curricula are not addressed in this consultation document. Curricula should be dynamic. Mechanisms to update or change curricula should be simple and should occur as part of the annual CQI external moderation hui.

5. NGĀ WHAKATAKOTORANGA | PROPOSAL 2.

5.1 Consultation question 2.1

We support replacing training schemes with micro-credentials (as stated earlier). There needs to be simple and consistent language for qualifications across the sector and micro-credentials are an easily understood concept. That they can be designed quickly and in response to unmet needs is attractive to industry, providers, learners, and Iwi/communities. Further detail is required around the parameters of micro-credentials though, such as what levels they may be at, how long will a micro-credential be valid for, and how might they be 'stackable'. Further detail or discussion is required about the role of micro-credentials as an alternate pathway for achieving a qualification.

5.2 Consultation question 2.2

Educators must be involved in the development of micro-credentials in a co-design process. Educators need to be consulted on how new micro-credentials will 'fit' with existing provision and qualifications and on any decisions about how the quantity or type of micro-credentialed qualifications may lead to or impact on existing qualifications.

5.3 Consultation question 2.3

There needs to be a phased process of transition between training schemes and micro-credentials.

5.4 Consultation question 2.4

It is anticipated that there will be costs involved in the transition from training schemes to micro-credentials as they become part of the new framework, because there will need to be adequate resourcing for the development of the new micro-credentials. Some existing training schemes may be able to be modified to become micro-credentials but will need detailed consideration of appropriate parameters to fit levels, credits, stackable criteria, etc.

5.5 Consultation question 2.5

The review process for micro-credentials will need to be considered as part of their development. Some areas, such as technology may have limited currency.

6. NGĀ WHAKATAKOTORANGA | PROPOSAL 3

6.1 Consultation question 3.1

We do not support WDCs being able to develop micro-credentials. We believe that micro-credentials should be developed by providers and if they are developed by WDCs that this is by a co-design process with educators. There are too many risks related to WDCs being the sole developers of micro-credentials such as a 'check box' focus or micro-credentials that duplicate existing provision.

6.2 Consultation question 3.2

The proposed changes will have a significant impact on all learners as it maps their futures based on qualifications. All stakeholders will need to contribute to and be part of the pathway planning for learners. These changes will have an impact on academic pathways for many years and need to be developed in a collaborative way. The changes will have the greatest impact on staff across the network of provision. And as the working conditions of staff are the learning conditions of students, it is important that the change is managed and not rushed, and that staff are actively involved and listened to.

6.3 Consultation question 3.3

We would not support non-providers or WDCs seeking NZQA approval for micro-credentials. Approval for micro-credentials does need to be tied to delivery. Micro-credentials must be co-designed with educators and industry, but different providers should seek approval based on how they will deliver the content. This is to ensure credibility for the credential. .

6.4 Consultation question 3.4

There are real risks if WDCs are able to develop micro-credentials. The structure of WDCs currently does not include educators or the capacity to facilitate co-design work. Allowing WDCs to develop micro-credentials risks the duplication of academic development that already sits with providers. This duplication is a waste of money and risks complicating the system when the aims of RoVE was to simplify the system and remove duplication and competition. There is the risk that allowing WDCs to have such functions will create a similar outcome to the ITOs, where you had separation, which RoVE was meant to reduce. It is unclear how supporting non-providers to produce micro-credentials would be more efficient, remove duplication, and better meet industry demand.

If WDCs are overseeing and collaborating in the development of new improved micro-credentials this would meet the above criteria. A risk may include a narrow, regional focus which does not allow the learner to transfer/transport these skills easily.

6.5 Consultation question 3.5

There would be significant costs if the WDCs had to establish and duplicate the ability to develop academic products such as micro-credentials. Most providers and especially Te Pūkenga should already have the resources to develop micro-credentials and conduct the necessary co-design work which is a much more cost-effective option. The resourcing costs of developing micro-credentials are inherent, the costs of staffing and time for consultation and development.

6.6 Consultation question 3.6

Micro-credentials have a role to play in supporting the intent of RoVE by providing easily accessible, portable, relevant, creditable, and verified sets of skills for learners. The development of micro-credentials needs to consider any connections to a qualification and be developed in a collaborative way that works for and connects with all stakeholders. The term micro-credential is easily understood, and for many learners it could be a pathway to different types of qualifications.

6.7 Consultation question 3.7

As part of simplifying qualifications, it is important to reduce the terms used and the different types of offerings that are currently available. The purpose of Training Packages could be achieved by micro-credentials. The aim is to have a simplified system that is more seamless for students. The priority is that micro-credentials must be credible and valued and this will only occur if there is good co-design with educators who have sector experience. How micro-credentials will 'fit' with other existing learning opportunities must be clearly considered, along with the level and length of time a micro-credential is valid for. Duplication must be avoided. How they could be 'stackable' or fit within a qualification and how they relate to skills standards must be clearly identified.