

NZQA's Further Consultation on Proposed Changes to the NZQF

Introduction

This submission represents feedback from Universities New Zealand Committee on University Academic Programmes (CUAP).

Consultation question 1: To what extent do you support the development of a broader qualifications and credentials framework, which would incorporate the NZQF, the DAS and other quality assured education products (such as micro-credentials and training schemes)?

Response: There is no good reason for including the DAS and other quality assured education products in a qualifications framework. The components of the Directory of Assessment Standards (DAS) are described by NZQA as “assessment standards [that ...] can contribute [our emphasis] to national qualifications”. They are akin to the course outcomes of courses that can contribute to diplomas, degrees and other qualifications that are not made up of unit or achievement standards. There is no good reason for including unit standards in a qualifications framework, nor, say, the outcomes of courses that lead to a degree in engineering. Neither the assessment standards nor the course outcomes are, in themselves, qualifications. Including them in the NZQF would simply increase the clutter and the difficulty of understanding the NZQF, and might make it more difficult for qualification components to remain up-to-date and relevant for a changing world.

Consultation question 2: To what extent do you support the proposed approach to embedding critical thinking, collaboration and communication into descriptors of levels 1 – 6 of the NZQF?

Response: The experience of secondary schools when attempting to assess the “key competencies” in the New Zealand Curriculum suggests that consistent, meaningful and reliable assessment of critical thinking, collaboration and communication may prove difficult across a number of providers and assessors.

Consultation question 3: Which of the two options below would be the most effective way of ensuring that learners have citizenship competencies: Option A: Including global citizenship competencies in the NZQF purpose statement and the graduate outcomes of the relevant qualification types. If you support this option, which qualification types should these competencies be included in? (e.g. all Certificates at levels 1 – 3 or other?) OR Option B: Narrowing the definition of citizenship and including the competency in the level descriptors. If you support this option, what aspects of citizenship should be included?

Response: It is difficult to know what might be meant now and in 20 years’ time by “global citizenship competencies” but of the two, Option A is more likely to allow qualifications to evolve appropriately as they undergo the ongoing evaluation and review required by the approval and accreditation rules.

In addition, the notion of 'narrowing the definition of citizenship and including competency descriptors' is highly problematic if the intention is to develop within students informed and active citizens. Citizenship competencies, such as informed knowledge of local, nation and global issues that need addressing, the ability to participate as citizens of a nation in democratic processes (including but not limited to voting, contributing to petitions, referendum, knowledge of democratic changes mechanisms and ability to participate in them), critical thinking, problem solving and the confidence and ability to take action are by no means simple to develop. A thorough and whole-school approach is likely to be needed to do this well and a reduction to instrumental competencies will be insufficient.

Consultation question 4: What further changes could be made to the NZQF to enable vocational qualifications to be listed at higher levels and to encourage the take up of Vocational pathways (i.e. in addition to revising the level and qualification type descriptors and redesigning the presentation of the NZQF)?

Response: The question is rather confused. Many vocational qualifications (medicine, dentistry, engineering, law, physiotherapy, teaching, nursing, architecture, to name a few) are already on the NZQF at level 7 or above. Presumably the real question is whether the intellectual demands of some trade training courses (currently at levels 1 to 4) are such that they should be placed at higher levels on the NZQF. This is a legitimate question, but its answer has more to do with the nature of the skills and knowledge required for those qualifications than with the NZQF itself. We have no problem with NZQA testing whether some sub-degree vocational qualifications are at the correct level on the framework, but we would want to be sure that any changes truly reflect the capabilities and knowledge expected of graduates at each level to ensure the NZQF remains credible internationally.

Consultation question 5: Which of the following actions should we take to address the identified issues with the level 7 Diplomas: a) removing the level 7 Diplomas from the NZQF or b) extending the regulatory framework for New Zealand qualifications at levels 1 – 6 to include level 7 Diplomas, reviewing the description of the qualification type and reviewing all level 7 Diplomas; or c) other actions.

Response: Many of the problems with Level 7 Diplomas described in the consultation booklet appear to be caused by inadequate quality assurance processes, which must be strengthened. It is anomalous that Level 7 covers both degrees (which require research activity by most of those involved in their teaching) and Level 7 Diplomas (which do not require research-led teaching). Moving Level 7 Diplomas to Level 6 and strengthening quality assurance processes would be sensible.

Consultation question 6: Which of the following actions should we take to address the identified issues with the Bachelor Honours Degrees: a. renaming the qualification-type (please tell us your suggestion for an alternative name); and/or b. strengthening the level 8 descriptors and revise the description of the Bachelor Honours Degree to match CUAP's definition; or c. removing the qualification-type from the NZQF (i.e. removing both pathways) or d. reclassifying the 480-credit pathway as a level 7 qualification (i.e. removing just the 480 credit pathway from level 8); or e. considering other options.

Response: This issue cannot be resolved easily while the loans and allowances regime favours postgraduate honours study over postgraduate master's study. As it stands, some of New Zealand's most able postgraduate students undertake honours degree study, and this needs to be recognised and fully considered in any decision. Also, given the proportion of students enrolled in honours degrees in Engineering qualifications, it is crucial that any changes meet the needs of Engineering programmes and industry, and do not undermine the status of those programmes or their ability to be recognised internationally as educating professional engineers. This extends to other honours degrees that require professional accreditation. In the meantime, it would make sense to use the CUAP definition for all honours degrees. This should help NZQA in its discussions about qualifications framework equivalence with other jurisdictions.

Consultation question 7: Are there any other matters associated with degree apprenticeships that we should be considering?

Response: There are well established examples of degrees that incorporate on-the-job training, but it is important that any new programmes called 'degree apprenticeships' are still degrees as defined in S253B(3) of the Education Act 1989. Such degrees should be taught mainly by people engaged in research, and they should emphasise general principles and basic knowledge as the basis for self-directed work and learning. 'Degree apprenticeships' that do not satisfy these requirements would damage the reputation of all New Zealand degrees and would ill-serve students.

Consultation question 8: Do you have any comment or suggestions on the proposed approach to the identified technical issues?

Response: Working with CUAP and universities is essential for all these issues.

Proposal 8 (Consultation questions 9-12): Making the NZQF easier to use and more relevant to all stakeholders (Four questions).

Response: As a general principle, listing all qualifications in te reo Māori as well as in English would be appropriate. We are unclear about the options for reflecting matauranga "throughout the framework", and we are unsure that there is an identifiable and significant "core purpose" for qualifications in "groups of levels". As we indicated in the earlier submissions, we are not sure that the NZQF needs work to make it more accessible to learners.

For queries about this submission please contact:

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