



Simplifying New Zealand Qualifications and Credentials

ITENZ Submission

16 June 2021

Introduction

Thank you for this opportunity to feed back on the proposals for *Simplifying New Zealand Qualifications and Credentials*.

ITENZ is a peak body representing PTEs and has approximately 140 members. Member PTEs range from small providers with one or two staff to very large providers. They are very diverse and:

- operate in a wide range of sectors covering most industries.
- may deliver on campuses, online and/or in workplaces
- may be funded or unfunded
- may deliver programmes on or off the NZQF
- may deliver programmes from L1-L9
- may have learners who are:
 - domestic or international
 - part time, full-time or attending short courses
 - made up of one or two dominant ethnicities or a wide range of ethnicities
 - school leavers, employees, or employers

There is not a singular view on the proposals held by all ITENZ members; however, there are a number of shared questions and concerns with regard to the proposals and their implementation and we think more information is needed to inform our views.

Response to Proposal One

We support the view that the vocational education system can be modernised so that the needs of learners and employers are more effectively and consistently met. We understand the intent of the proposal for simplifying qualifications and the high-level thinking behind it.

We have concerns about the untested nature of the solution, the pace of change, the costs to providers and whether the mistakes of the Targeted Review of Qualifications (TROQ), will be repeated.

It is difficult not to compare the current proposals to the TROQ which has been ongoing since 2008 and which had similar aspirations to the current proposals. The 2008-09 review found that the then qualifications system was *difficult for learners, employers and industry to understand*. The TROQ changes, according to NZQA, *create[d] a simpler system with fewer qualifications*.¹

Similarly, the “opportunity’ that the current review has identified *is to consider if a simplification of the range of vocational education products could further support the overall RoVE objectives, particularly...[the] consistency of what graduates know and can do, so that employers can have confidence in their skills*²

Although worded differently, and although the current consultation is taking place within the context of RoVE, the objectives are essentially the same; to have fewer, more industry-relevant, and easier to understand qualifications, and to reduce duplication. We agree that, in principle, this is an appropriate objective.

Despite the many years it has continued and despite the huge financial and resourcing investment made by taxpayers and by providers, TROQ has failed to achieve its objectives. Providers have invested, and continue to invest, significant amounts of time, money and people resources into redeveloping their own programmes and resources. They have also contributed time and people resources to the completion of the national TROQ project. To see that it has failed and to be faced with additional financial and time costs to fix the problem is extremely disheartening.

An historical failure should not be a reason to abandon a vision for a better system, of course. Nevertheless, to undertake consultation on simplifying qualifications at the end of a decade-long project in simplifying qualifications points to serious failures in the project. We would like to know what has been learned from TROQ and how that has influenced the planning for the current proposals before embarking on another years-long project.

We do question whether the qualifications and programmes currently in use are failing to meet the needs of industry to the extent suggested by these proposals and, if they are, whether the whole system needs to change or whether the levers that already exist to manage this are not being used sufficiently well.

For example, NZQA’s programme approval process requires applicants to demonstrate industry need, and both TEC and NZQA are explicit in the need for programmes to deliver employment outcomes. Industry already has the opportunity to influence providers, to expect certain skills and knowledge to be taught, and to support applications that meet their need. If this is not working sufficiently well it may be that the existing processes are not performing as they should. Fixing that does not necessarily require the changes proposed.

We are concerned that the need to address competition and programme disparity between the subsidiaries of Te Pukenga, as well as to address quality and efficiency issues within Te Pukenga is driving this change across the whole sector.

¹ NZQA <https://www.nzqa.govt.nz/qualifications-standards/quals-development/targeted-review-of-qualifications/>

² RoVE. Consultation on Simplifying New Zealand Qualifications and Credentials. P7

It does make sense for an organisation like Te Pūkenga to have a single qualification and curriculum that each of its subsidiaries can deliver (Proposal 1, B) but that does not necessarily mean that it is the best solution for the whole vocational education sector. Te Pūkenga could achieve simplification of its qualifications and programmes through internal policies and processes. Internal changes could even have a flow on effect to the wider sector thereby achieving the goal of having fewer programmes.

Comparing the current proposals to the situation with TROQ again, a number of assumptions for that review proved to be wrong. These included that the qualification development process would be collaborative and would lead to fit-for-purpose New Zealand qualifications, that providers would share or buy and sell programmes thereby limiting the number of programmes, and that providers would construct programmes out of existing unit standards.

Similarly, there appear to be some assumptions underlying the current proposals which are questionable.

The same assumption, that Te Pūkenga or other providers develop training and learning resources for shared use, underlies Proposal 1, B³. Given that this wasn't able to be facilitated under TROQ, we would like to know what mechanisms will be put in place to facilitate it under the new proposals and how fair, equitable, and affordable distribution of resources will be implemented and managed.

The assumption that qualification development process led by WDCs will be collaborative and will lead to fit-for-purpose qualifications is questionable. In these early stages of RoVE we are not seeing sufficient evidence of collaboration across the sectors. Furthermore, we do not see evidence from TROQ of collaborative processes leading to fit-for-purpose qualifications. The NZ Diploma of Business is a prime example of a reviewed and then renewed qualification that did not meet the needs of employers, providers or learners.

WDCs are still an unknown quantity and while the expectation may be that they *will work collaboratively with industry and providers to set standards, develop qualifications and help shape the delivery of vocational education*⁴ we think that there will need to be policies in place that require them to do so.

We are particularly concerned about whether the WDCs will have the capability to provide the educational leadership for the development of a national curriculum or the expertise and capability to develop, maintain or endorse qualifications that are fit for purpose. The proposals do not provide sufficient information about how this will happen in a way that is better than the current situation or how it will differ from the ways in which ITOs have developed qualifications and standards in the past. We would like more information on this.

We wonder whether there is anything to stop short cuts in the development process, such as a WDC choosing an existing programme and making that the national curriculum and, if not, what policies and procedures would be put in place to prevent that from happening.

We would like more detail about what a *national curriculum* is and what *core content* means. In the broadest sense a curriculum is the whole framework for learning and includes approaches to teaching and learning, courses and content, expected outcomes, assessment, resources, policies, guidelines and so on. Here, *national curriculum* appears to be a name for a list of skills standards.

³ RoVE. Consultation on Simplifying New Zealand Qualifications and Credentials. P11

⁴ RoVE. Consultation on Simplifying New Zealand Qualifications and Credentials. P3

If there is a proposal to introduce a national curriculum/some national curricula in the VET sector then this is a significant departure from the current model and requires a lot more information and consultation. Alternatively, if “national curriculum” is simply a list of standards, or another name for “programme,” then a name change is required.

The assumption that a “national curriculum” will be sufficiently flexible to adapt to regional or contextual variations or needs is questionable. We think that a “national curriculum” is far less likely to be agile or able to respond quickly to changing needs.

We support the intention that, depending on the nature and purpose of the qualification, the “national curriculum” could be specified at a high level or at a more detailed level; however, we are concerned that it will be insufficiently flexible to meet regional variations. We don’t agree that the answer to this is the addition of micro-credentials.⁵

We would like more detail on how a “national curriculum” will be agile, flexible and able to meet variable needs.

We are particularly concerned that the well-recognised capability of PTEs to deliver learner-centred, industry-relevant, niche programmes will be compromised.

We don’t think the assumption that under a “national curriculum”, learners will be able to easily move from one provider to another or one location to another is well-supported when timetables, start dates, delivery modes and so on will differ.

We would also like more information on how skills standards will differ from unit standards and how they will be better, in addition to the example provided. We would especially like information on how any current issues with unit standards will be addressed; for example, issues with credit weightings which are not appropriate, with over- or under-assessment, with a focus on atomised skills or competencies at the expense of overall learning outcomes, and with poor assessment, moderation and monitoring processes. Our recommendation is that this information be provided before a decision is made.

We would like to know how Government will support providers with the cost of change, which will be significant even under the proposals requiring least change. We believe there needs to be some support for this especially given the continual increase of regulatory costs. While we recognise that the intention is to simplify qualifications and therefore regulatory impositions and costs on providers, we have no confidence that this will be the case. History supports this view.

We also wonder why an untested “solution” is being proposed without the opportunity for a trial. We would recommend that a pilot, consisting of the collaborative development of a new qualification and curriculum, be trialled through the proposed options.

Summary of response to Proposal One

While we support the need to continually update and improve the vocational education system, we see these proposals as being insufficiently well-tested and risky, given the many unknowns. In

⁵ RoVE. Consultation on Simplifying New Zealand Qualifications and Credentials. P19

particular, we have serious concerns about the implementation of the changes and the capability to do this well.

We would like more information on how the proposals will work in practice and an extended time for consultation for consideration of alternatives.

In particular, we would like to understand:

- What has been learned from TROQ and how those learnings have influenced the planning for the current proposals so that the same poor outcomes are not repeated.
- What evidence there is that the system is failing industry to the extent suggested.
- Whether the problems can be fixed by more effectively using levers that are already in place.
- Whether the proposals are primarily intended to improve Te Pukenga operations and if so, why that can't be achieved through internal policies and processes.
- Whether assumptions, such as collaborative development and sharing of resources, have been tested and what the plans are for managing this.
- How we can be assured that WDCs will have the educational leadership and capability to lead curriculum development and to gain and maintain the trust of the education sector.
- How flexibility can be built into the qualifications to meet differing needs and how the capability of PTEs to deliver the already well-regarded niche programmes will be guaranteed.
- What is meant by "national curriculum."
- What skills standards will look like and how we can be sure that the problems with unit standards won't be replicated.
- Whether the significant financial and resourcing costs to providers have been considered and, if so, how providers can be supported.
- Whether the option of a pilot can be considered to test the proposals.

Response to Proposal Two

We agree that *training scheme* is a confusing term and understand that *micro-credential* is a more internationally-recognised term.

We think that the existing definitions and criteria for training schemes are problematic and we know that the training scheme criteria does not work in all cases. Consequently, we have concerns about *the current legislated definition of training schemes [being applied] to micro-credentials*.^[1]

Given the extent of all changes proposed in this consultation, we believe it will be a lost opportunity not to review definitions, criteria, and so on of training schemes/micro-credentials in light of past experience.

We would like to know what changes are being made to address issues that have arisen with training schemes and more information on how micro-credentials will be an improvement, apart from by having better name recognition.

We would also like to know how the question of English Language (EL) courses will be addressed. For a number of years, English language providers have argued that EL courses do not fit within the definition of training schemes despite being required to do so. They have argued that in addition to programmes (or qualifications) and training schemes (or micro-credentials) there is a third category, English Language Courses, which is distinct from the other two categories.

^[1] RoVE. Consultation on Simplifying New Zealand Qualifications and Credentials. P14

Until now, the problem of EL courses has been 'resolved' by deeming them training schemes. We do not believe that deeming a deemed training scheme to be a micro-credential is useful.

The arguments for a third category are well-documented in communications between the EL sector and Government, and is understood by agencies. The Act allows for identifying specialist areas. The International Education Strategy in 2018 recognised that work needs to be done in this area.

We could not support a proposal that does not take account of the distinct nature of EL courses and which does not use this opportunity to address the shortcomings in the current system. We believe that a third category, English Language Courses should be included at this time and we would like to see English Language Courses included in any legislative change.

Response to Proposal Three

Our concerns regarding WDC development of micro-credentials echo those described in Proposal One.

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