

Submission

by

Business|NZ

to the

New Zealand Qualifications Authority

on the

**Review of Gazetted Criteria for Course
Approval and Accreditation**

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Review of Gazetted Criteria for Course Approval and Accreditation

1. Introduction

- 1.1. This submission is made on behalf of Business New Zealand, incorporating regional employers' and manufacturers' organisations. The regional organisations consist of the Employers' and Manufacturers' Association (Northern), the Employers' and Manufacturers' Association (Central), Canterbury Manufacturers' Association, Canterbury Employers Chambers of Commerce, and the Otago-Southland Employers' Association. Business New Zealand represents business and employer interests in all matters affecting the business and employment sectors.
- 1.2. One of Business New Zealand's key goals is to see the implementation of policies that would see New Zealand retain a first world national income and regain a place in the top ten of the OECD in per capita GDP terms. This is a goal that is shared by the Government. It is widely acknowledged that consistent, sustainable growth in real GDP per capita of well in excess of 4% per annum (and probably closer to 7-8%) would be required to achieve this goal. Continued growth of around 2% (our long-run average) would only continue New Zealand's relative decline.
- 1.3. The effective use of the \$1.5 billion dollars expended on post-compulsory education and training is a critical part of achieving these objectives. Achieving consistently high growth rates will require significant improvements in productivity. Improving the skill levels of the existing workforce, and those entering it, is likely to be the most critical factor in this. The challenge facing NZ in this respect is stark – 25% of New Zealanders aged 25-64 have no qualification, and only 35% have a post-school qualification. This submission is made in this light.

2. Summary of recommendations

2.1. Business New Zealand recommends that:

- a) The proposal to establish a unified set of criteria for the approval and / or accreditation of all post-compulsory education and training courses be accepted;
- b) The proposed content of the criteria be accepted, with the addition of the following new criterion for both approval and accreditation:

Credit recognition and transfer The adequacy of the design and / or delivery of the course to support and enable appropriate credit recognition and transfer.

- c) The requirements relating to 'acceptability of the course' and 'quality assurance' should apply to both course approval and accreditation;
- d) It should be made clear that those organisations seeking only course approval must meet the requirements of registration on the NZ Register of Quality Assured Qualifications;
- e) Treaty of Waitangi issues not be incorporated into the criteria for the approval and accreditation of specific courses, but remain organisation-wide issues; and
- f) The current eight system-based accreditation criteria for organisations delivering courses based upon NQF unit standards remain.

3. Unified Set of Criteria

- 3.1. Business New Zealand strongly supports the creation of a unified and simplified set of criteria covering all courses in post-compulsory education and training.
- 3.2. A unified set of criteria should enable greater consistency of quality assurance across the post-compulsory education and training system. This is particularly important if lifelong and workplace learning are to be facilitated.

4. Content of the Criteria

- 4.1. Business New Zealand supports the proposed new unified set of criteria covering course approval and / or accreditation. In general the content of the proposed set of criteria seem to address most of the issues of concern to business and other stakeholders.
- 4.2. In particular, Business NZ strongly endorses the requirement for a course and / or its delivery to be acceptable to relevant stakeholders. It will be important that quality assurance bodies have in place adequate and appropriate mechanism for verifying that all courses and their delivery are acceptable to the relevant stakeholder groups.
- 4.3. There is, however, one aspect of stakeholder needs that is not addressed by the proposed content of the criteria, namely the adequacy of the design of courses such that they facilitate and enable credit recognition and transfer. While there is a requirement for the adequacy of regulations for credit transfer, this does not address the design of the course or its delivery, such that it enables or facilitates adequate and appropriate credit recognition and transfer.
- 4.4. Where possible, the quality assurance system should encourage qualifications developers and providers to develop and deliver courses in a manner that facilitates credit recognition and transfer, by for example,

designing and delivering courses in modular form. This is essential if the learning needs of those already in the workforce – 80% of whom will still be in the workforce in ten years time. Lifting the skill levels of New Zealand's working-age population will require a highly flexible and integrated system of credit recognition and transfer, and the quality assurance of courses should support this.

- 4.5. Business NZ therefore recommends the addition of the following criterion for the approval and/or accreditation of a course:

<i>Credit recognition and transfer</i>	The adequacy of the design and / or delivery of the course to support and enable appropriate credit recognition and transfer.
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5. Split between approval and accreditation

- 5.1. Business NZ supports the split of requirements between the three options for course approval and / or accreditation. Business NZ recommends that the requirements for 'acceptability of the course' and 'quality assurance' should apply both in terms of course approval and of accreditation.
- 5.2. The text under 'Scenario two – approval criteria' does not specifically mention the requirement that qualifications developers not seeking accreditation alongside approval will have to meet the requirements for registration on the NZ Register of Quality Assured Qualifications. Business NZ recommends that it be made clear that qualifications developers must meet this requirement.

6. Treaty of Waitangi Requirements

- 6.1. Business NZ supports the conclusion of the Working Party that Treaty of Waitangi issues are an organisation-wide issue for education and training organisations, and are therefore at a higher level than approval and accreditation for specific courses.

7. Accreditation criteria relating to the NQF

- 7.1. Business NZ supports the working party's recommendation that the eight existing systems-based accreditation criteria currently used to accredit organisations to deliver courses based on NQF unit standards continue to be used in that context. Business NZ supports the concept that these be used as the operational requirements to demonstrate that the organisation has met the proposed new unified accreditation criteria.

8. Conclusion

- 8.1. Business NZ sees the improvement of the skill level and hence the productivity of New Zealand's workforce as a critical element of lifting our nation's standard of living. The quality of courses and their delivery is a vital part of this. A critical part of the quality of courses is their fitness for purpose – and in the New Zealand context fitness for purpose must include enabling and supporting credit recognition and transfer.