

Introduction

1. Thank you for the opportunity to comment on the discussion paper *Expanding the Record of Achievement* (the discussion paper)
2. As the National Centre for Tertiary Teaching Excellence, Ako Aotearoa's mandate is to support the best possible outcomes for all learners in tertiary education. We do this through supporting change projects that lead to benefits for learners, providing professional development, and leading discussion in the sector on key strategic issues. Our focus lies across the entire tertiary system, from postgraduate research degrees to fundamental skills and 'second-chance' learning, and involves all aspects of tertiary education that support good learner outcomes.
3. Given our mandate, this submission discusses the New Zealand Qualification Authority's (NZQA) proposals from a teaching, learning, and learner-focused perspective. We assume that submissions from other stakeholders will address provider-focused issues such as logistical or infrastructure implications.

Rationale and Process

5. We support the notion of expanding the Record of Achievement (the Universal RoA) as outlined in the discussion paper. We do not believe there is any principle-based argument for excluding qualifications without assessment standards from the RoA.
6. In particular, following the Mandatory Review of Qualifications, organisations will be able to develop both standards-based and 'local content'-based programmes that lead to a given qualification. It would be confusing and unjust for some learners to have their qualification listed on their RoA while others with the same qualification could not have it listed, purely due to how providers had decided to structure the programme.
7. We strongly support the signalled intention to involve both secondary and tertiary students in the further development of the Universal RoA. We have argued in previous submissions and outputs that if policy work is being undertaken for the benefit of learners, then learners must be explicitly involved in its development.¹ It is very positive to see NZQA acting in accordance with this principle.
8. We also welcome the explicit reference to considering privacy aspects of this work. Although we currently believe that developing the Universal RoA is unlikely to involve significant privacy issues, we strongly support NZQA continuing to give due and visible weight to the potential for privacy concerns in relation to learner data.

¹ See www.ako.aotearoa.ac.nz/submissions for submissions on previous issues.

9. It is unclear why NZQA is considering three phases in the development of the Universal RoA. We presume that Phase Three involves the inclusion of education outcomes other than formal NZQF qualifications (e.g. fully privately-owned and non-funded qualifications, professional accreditation or licensing etc.) in the Universal RoA. We would agree that it is appropriate to position this as a longer-term goal, given that developing robust processes for including these forms of achievement in the RoA is likely to be a complex task.
10. However, it is unclear why a distinction has been drawn between Phase 1 and 2, when the only material difference appears to be that Phase 1 concerns pre-degree qualifications and Phase 2 concerns degree and postgraduate qualifications. The discussion paper provides no reasoning for this distinction, and we do not believe that any rationale is self-evident nor that learners with degree and postgraduate qualifications are in less need of having their qualifications recorded on a Universal RoA than graduates with level 1-6 qualifications. Conversely, in our experience credit recognition / transfer between pre-degree and degree level qualifications is a significant issue for learners and the proposed two-Phase approach could exacerbate this by implying a qualitative difference between these types of qualifications. We therefore recommend that Phase 1 involve implementing the Universal RoA for all NZQF qualifications (levels 1-10), with Phase 2 involving the extension of the Universal RoA to non-NZQF qualifications.

Benefits

11. The stated benefits in the discussion paper appear to be somewhat exaggerated; while the Universal RoA will provide a clearer, easier method for accessing and presenting evidence of qualifications it will not in itself drive all of the improvements sought. For example, it is not clear that existing issues around Recognition of Prior Learning and inter-provider/ inter-sector articulation relate to the current absence of qualifications from the RoA – transcripts from a TEO are, after all, official evidence that qualifications have been achieved. Anecdotally, difficulties in this area may be more related to parity of esteem between providers and/or sectors, financial incentives, and similar systemic or structural issues than RoA listing requirements.
12. Similarly, it seems unlikely that the Universal RoA would materially improve the ability of employees to develop a career path and/or employers to implement professional development (the second cited benefit for learners). An employee and employer will, after all, be aware of the qualifications an employee possesses irrespective of whether these are recorded on a centrally-maintained RoA.
13. Furthermore, making the record available in Te Reo (learner benefit 4) is a valuable design feature of the proposed Universal RoA, and referring users to individual organisations for detailed information on learner achievement (education organisation benefit 4) is a sensible design decision. However, these are characteristics of the proposed Record, not intrinsic benefits gained from implementing the Universal RoA.
14. We do, however, support the underlying theme that runs through the discussion of likely benefits: that there will be an independently verified and maintained repository of information for *all* of a learner's educational achievement, rather than

just some elements. This makes that information more easily accessible and usable for those who might need it, and we believe that this is a strong enough rationale in its own right for implementing the Universal RoA.

15. We also note that an unlisted benefit for learners is that having all qualifications listed on the Universal RoA will reduce potential for discrimination between programmes (and thus graduates) based purely on programme structure (as noted in paragraph 6 above).

Challenges

16. We believe that the challenges involved in developing the Universal RoA will be primarily logistical, and as noted in paragraph 3 above we therefore will largely not comment on them in this submission.
17. Notwithstanding this, of the two proposed methods for handling the transition to the Universal RoA, we support the second option (asking institutions to verify NZQA's records and correct errors) due to likely lower compliance costs. It will, however, be important that providers are encouraged to devote sufficient internal resources to this verification process, to ensure that learners are not disadvantaged by this approach.

Conclusion

18. In conclusion, Ako Aotearoa would like to reiterate its support for the proposed Universal Record of Achievement.
19. We look forward to the next steps in this work, and would be pleased to offer any further support or advice that would be of use.

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