

**Ako Aotearoa response to:
NZQA consultation on the draft integrated quality assurance framework
December 2024**

Introduction and general recommendations

This submission to NZQA on the draft integrated quality assurance framework is from Ako Aotearoa, the National Centre for Tertiary Teaching Excellence. We have made several recommendations and have asked some questions that will support the framework to help organisations provide high quality teaching and learning.

The recent AI innovations provide a great opportunity for NZQA to evolve their relationships with providers. There are some AI recommendations that are provided under each of the questions. There are also some general AI specific recommendations.

AI Specific General Recommendations

1. **Transparency in NZQA's Use of Technology and AI:** NZQA should be clear about how it uses AI and other technologies in its monitoring and regulatory activities, ensuring trust and alignment with equity goals.
2. **Ethical AI Use in Education:** Develop guidance for TEOs on ethical, fair, and transparent AI use, particularly ensuring it supports equity for Māori, Pasifika, and disabled learners.
3. **Reduce Compliance Burdens:** Streamline compliance processes to avoid duplication between NZQA and TEC requirements, focusing on efficiency for providers.
4. **AI for System Improvement:** Use AI and data analytics to enhance monitoring and trend analysis while supporting providers to adopt technology effectively.

iQAF components

1. Do the four cornerstones describe the important elements of quality assurance? What would you change or add?

The cornerstones are robust but should take account of:

- **Effective use of AI:** Address how NZQA will use AI responsibly and transparently in its regulatory activities.
- **Avoid duplication:** Include commitments to avoiding duplication of compliance requirements with TEC, particularly for small providers.
- **TEO ownership of quality and quality improvement:** Some TEOs need guidance and support in conducting the annual self-review. Consider how they access this support and the resources available to providers in the form of webinars, drop-in sessions, clips, case studies etc.

- **Effective verification of TEO quality:** Is there a feedback mechanism so that stakeholders, including TEOs, employers, industry bodies, learners, educators, iwi/hapū/whānau and professional bodies have an opportunity, either directly to NZQA or indirectly via the TEO, to provide feedback about the verification and assessment of TEO quality? This feedback will help to ensure the solid foundations remain sound.

2. Do you think the proposed enablers will be effective in supporting the overall quality assurance approach? What would you change or add?

The enablers are effective but need:

- **Data and insights:** The consultation document mentions that feedback from learners will be included. The learner voice is important, and this should include, where possible, feedback from learners from a range of cultural backgrounds, as well as disabled and neurodivergent learners. The educator voice is equally important, and ideally includes the feedback from educators at different programme levels. Obviously, it's important for respondents to have the assurance that feedback is anonymous and confidential, for them to feel safe about sharing their thoughts openly.
- **Data and insights:** These are essential and have the potential to provide key information. We have experience where data was incorrect and did not provide useful information. This occurred in the 2021 qualification review of adult tertiary teaching qualifications. There was a discrepancy between the data from the TEC Single Data Return and the data that providers gave us for some of the qualifications. If not already done, then work will be required to ensure that the data is meaningful and effective.
- **Use of AI:** To develop trust and build good relationships there needs to be transparency about NZQA's use of technology and AI to ensure fairness.
- **Reduce compliance burden:** There needs to be specific mechanisms to reduce the compliance burden on TEOs, especially where TEC processes overlap with those of NZQA.
- **A risk-informed approach:** Research demonstrates that educator quality is one of the primary factors in learner success. We cannot stress enough that TEOs need to ensure educators can access continuous PLD opportunities and have support in designing their individual professional learning pathway. Systems need to be in place for this, including time and budget allowances. Not having such a system in place would be a significant risk. Should it be included in the risk types?
- **Respectful and collaborative relationships:** It's good to see this included, as the success of the Quality Assurance Framework hinges on strong and trusting relationships. How will NZQA ensure the building and strengthening of these relationships is a mutual process, with input from all stakeholders? Respect and collaboration are two-way processes. If NZQA sets the terms of the relationships an opportunity may be lost to effect open, meaningful relationships. Also, it goes without saying that stakeholder engagement needs to reflect Te Tiriti o Waitangi principles.

Strong quality assurance foundations

3. Do you think the proposed activities under 'Set rules' will help TEOs get things right the first time? What you change or add?

User centred design process: We recommend that the end users are more involved in the development of the rules and their implementation. How will the NZQA rules and expectations be defined? Will there be consultation to ensure they are aligned with what is achievable for TEOs?

PLD on teaching and learning: Access to and engagement in continuous Professional Learning and Development (PLD) for staff should be included in the NZQA expectations.

Use of AI: Rules must include clear guidance on integrating and using AI in education.

Avoid duplication: Ensure that rules align with requirements to prevent unnecessary duplication.

4. Do you think the proposed activities for 'Educate and inform' will contribute to TEO capability? What would you change or add?

TEO networking and support: Would it help if TEOs had opportunities for networking and collaborating, so that they can support each other in the education process? This could be through a Community of Professional Learning, where they could also access the information and self-help tools.

Use of AI: Provide clear resources on AI integration and ethical practices.

Avoid overlap: Share insights on best practices and avoid compliance-related overlap with TEC.

5. Do you think the proposed activities under 'Approve' could drive more effective and efficient processes? Do you have other suggestions?

Evaluation and feedback: We recommend that more is done to make sure that the approval process works well. This could help to refine the criteria, and communication with the Standard-setting bodies (SSBs) and providers. Feedback will help to ensure that the process is meeting SSB and provider needs.

TEO ownership of quality and quality improvement

6. What should be included in a succinct self-review report to assist with a TEO's reflection and ensure the self-review is authentic?

Here are some ideas:

- How does the TEO ensure instructional design and facilitation is learner-centred?
- What mechanisms are in place for learners to have a voice?
- Are learning outcomes clear, specific, measurable, achievable and transparent?
- What measures are taken to ensure the diverse needs of all learners are met to ensure equity and accessibility, including the needs of Māori and Pacific learners,

neurodivergent and disabled learners, and learners with support needs? Are staff being upskilled in the principles of Universal Design for Learning?

- How do educators engage in continuous PLD opportunities and reflective practice, and what support do they have in designing their individual professional learning pathway?
- What efforts are made to build the cultural capability of staff?
- Are there clear progression pathways for learners within and between qualifications?
- How does the TEO ensure teaching, learning and assessment activities are evidence-based and research-informed?
- What efforts are made to ensure online and blended learning approaches are engaging, accessible and effective? Are digital literacy skills embedded in programmes?
- What processes are in place for continuous improvement?
- Evidence of how AI tools are being used ethically and equitably.
- A section to cross-reference TEC requirements to streamline processes.

TEOs already need to report on some of these aspects to the TEC in the Learner Success Plans, so duplication of reporting should be avoided where possible.

7. Do you like the idea of an annual discussion with NZQA based on a TEO's action plan? Please give your reasons.

Yes, particularly as the intention is for the discussion not to be related to any enforcement activities. It might be useful to be very clear about the purpose of the discussion. For example, if the intention is to have a constructive and supportive kōrero, where TEOs feel they can be open and share any concerns, questions and suggestions they might have, and receive guidance and support, it may set the scene for a constructive and meaningful discussion.

Effective verification of TEO quality

8. Do you support a shift to more targeted, risk-informed monitoring supported by periodic monitoring? Please give your reasons.

Yes, it seems a less top-down approach. The category ratings were rather black and white, and offered little scope for nuances. Also ensure that the targeted monitoring avoids doubling up on TEC-driven reviews. Also note that the use of AI analytics has the potential to enhance monitoring efficiency while maintaining transparency.

9. Do you consider that the proposed integrated monitoring activities are sufficient to give confidence about a provider's performance, without category ratings? Please give your reasons.

Confidence about a provider's performance needs to be founded on accurate, comprehensive evidence from a range of sources. We suggest monitoring, validating and evaluating the new process for its robustness and rigour to ensure it meets the requirements.

NZQA should share real-time insights transparently, including how technology like AI informs monitoring.

There needs to be integration with TEC processes as well to reduce unnecessary reporting burdens.

System assurance

11. To what extent do you think these activities will be effective in supporting system performance and improvement?

The are effective, but NZQA must

- Include AI in thematic reviews and system improvement strategies.
- Collaborate with TEC to ensure aligned and non-duplicative compliance processes.
- Explore how sustainability can be included in the system, to ensure programmes and approaches are sustainable, future-focused and responsive to emerging trends and challenges.
- Investigate how NZQA can collaborate with global partners to foster credibility of New Zealand qualifications, and ensure they meet internationally recognised standards.