

**TEU****TERTIARY EDUCATION UNION**
TE HAUTŪ KAHURANGI

Submission of

**Te Hautū Kahurangi | Tertiary Education
Union**

to the

New Zealand Qualifications Authority

on the

**Consultation on describing tertiary education
provider quality under iQAF**

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Introduction

Te Hautū Kahurangi | Tertiary Education Union (TEU) welcomes this opportunity to respond to the *Consultation on describing tertiary education provider quality under iQAF*.

The TEU is the largest union and professional association representing 12,000 academic and general/allied staff in the tertiary education sector (in universities, institutes of technology/polytechnics, wānanga, private training establishments, and rural education activities programmes).

TEU position

We conditionally support the proposed approach as an improvement on the binary compliant/non-compliant model, subject to the following concerns being addressed.

1. Do you think the proposed approach will be effective in summarising overall TEP quality? What other options would you suggest?

The framework has no workforce capability indicator

None of the four proposed criteria directly measures staffing sufficiency, reliance on casual or fixed-term employment, workload, or investment in professional development, despite the consultation document's own acknowledgement that "appropriate academic staffing" (p.12) underpins a Tertiary Education Provider's (TEP) capability to sustain quality delivery.

In our experience, understaffing and excessive reliance on insecure employment are leading drivers of the very failures the criteria are designed to detect – i.e., inconsistent assessment practice, poor moderation outcomes, and gaps in pastoral care. A framework that scores the symptoms without any visibility of this underlying cause will produce a descriptor that is, at best, incomplete, and at worst systematically blind to major quality risk.

We **recommend** that NZQA add a workforce capability indicator which draws on data TEPs already report (e.g., staff-student ratios; proportion of casualised teaching staff; staff turnover).

No role for staff voice in the evidence base

The annual self-review that underpins the quality management system criterion is described as a TEP responsibility (p.13), with no reference to consulting staff who deliver the teaching, training, and assessment being reviewed.

We **recommend** NZQA require TEPs to consult staff unions and staff representatives as part of the annual self-review process, consistent with the framework's own emphasis on "TEO ownership of quality" (p.5) extending meaningfully to the people who do the work.

2. Do you think ‘highly effective, effective, and not effective’ are appropriate overall descriptors? What other options would you suggest?

We are concerned that a three-tier label understates the real-world stakes attached to the descriptor, and can obscure meaningful differences between providers that fall within the same band. For example, under the proposed scoring, a TEP scoring 5 out of 10 and one scoring 8 out of 10 both receive an identical “effective” label, despite a substantial difference in underlying performance.

We **recommend** the following:

- Adding a fourth tier to reduce the size of the step between ‘effective’ and ‘not effective,’ so that a provider is not pushed to the bottom category by a marginal shortfall; and
- Publishing publicly the underlying numeric score and the criterion-level breakdown alongside the label, so stakeholders can see where a TEP sits within its band, rather than relying on a single word that can mask significant variation.

3. For the ‘quality management system implementation’ criterion, should there be a minimum score required for a TEP to be assigned the ‘Highly effective’ and ‘Effective’ descriptors? What would you suggest?

We support a minimum score for this criterion. A provider’s quality management system is what identifies and corrects problems in programme design, delivery, and assessment – i.e., the areas measured by the other three criteria. A provider that neglects its quality management system is more likely to let issues in those other areas go unnoticed, so a minimum score here would help ensure the overall descriptor reflects genuine, sustained capability.

4. Looking at the provider examples in Appendix 1, do you think the proposed approach sufficiently reflects the diverse nature of TEPs, and the materiality of quality criteria outcomes?

Provider B, a small provider, retains its previously assigned outcome for two of the four criteria because it has no recent applications and no recent monitoring activity. Its overall ‘Effective’ descriptor is therefore based on historic rather than current information. This potentially goes against the stated purpose of the iQAF, which is to “provide a more up-to-date view of TEP quality” (p.21) than the previous four-yearly cycle. In practice, descriptors may end up depending heavily on a TEP’s size and activity level, which risks smaller providers being judged on out-of-date information for longer than larger, more frequently monitored providers.

We **recommend** that NZQA clarifies how long a carried-over outcome may stand before it must be renewed.

5. Do you have any comments or suggestions for issuing and publishing the overall quality descriptor?

Quarterly updates “by exception” (p.21) could increase both the frequency of change to a TEP’s public rating and the administrative burden on the quality and compliance staff who must respond to short-notice reviews, on top of existing reporting obligations.

We **recommend** NZQA publish clear, specific criteria for what triggers an out-of-cycle update, and provide TEPs with reasonable advance notice beforehand.

Charging TEPs NZQA’s standard fee-for-service (\$240 per hour) (p.22) to request a review creates a financial disincentive for smaller provider to challenge a descriptor, even where it may be inaccurate. Given the downstream use of the descriptor by the Tertiary Education Commission (TEC) and Immigration New Zealand (INZ), an unchallenged but incorrect rating can have direct consequences for jobs.

We **recommend** the review fee be waived, or refunded, where a review is upheld in the TEP’s favour.

6. NZQA will need to use outcomes from quality assurance activities over a specific timeframe to determine an initial overall descriptor for each TEP. What timeframe would you suggest is appropriate?

We **recommend** against establishing the initial baseline over a short or snapshot period. Instead, we suggest that NZQA establish the initial descriptor using a full annual self-review cycle (a minimum of 12 months) of quality assurance activity, to allow a more representative evidence base, particularly for smaller providers whose activity in any shorter window may be limited to one or two events.

We further **recommend** that the proposed first publication date of July 2027 not proceed until this full cycle is complete and TEP has had a genuine opportunity to review and query its preliminary score ahead of public release.

7. Conclusion

TEU supports NZQA’s move toward a more current, nuanced picture of tertiary education provider quality.

However, our main concern is that the proposed criteria measure outputs without accounting for the staffing and working conditions that produce them. Given the framework’s direct link to funding and immigration settings – factors which affect our members – it is our view that this gap must be addressed before the framework is finalised.