

**27 April 2018**

## Consultation on changes to NZQA Rules

We are pleased to provide comment to the New Zealand Qualifications Authority (NZQA) on proposed changes to NZQA Rules via the online survey.

### **About Te Rito Maioha Early Childhood New Zealand**

Te Rito Maioha Early Childhood New Zealand is a national organisation that promotes high-quality early childhood education (ECE) through initial teacher education, professional development, leadership programmes, advocacy and membership services.

Te Rito Maioha is a membership organisation. We represent early childhood education services and the teachers who provide education and care to thousands of infants, toddlers and young children. Our members are drawn from a diverse range of community-based and privately-owned education and care services, home-based services and kindergartens.

Te Rito Maioha is also one of New Zealand's top providers of initial teacher education for ECE teachers, and is recognised as a leader in bicultural teacher education. We deliver a suite of qualifications and teacher education and professional development programmes that are of interest to both domestic and international students.

Te Rito Maioha is committed to high-quality early childhood care and education for every New Zealand child. That has been our purpose for 55 years since our formation in 1963, originally as the New Zealand Association of Childcare Centres and later as Te Tari Puna Ora o Aotearoa | NZ Childcare Association.

### **Response to survey questions (3-12)**

*3. Do you agree with the proposed changes to the NZQF Programme Approval and Accreditation Rules 2013?*

No comments.

*4. Do you agree with the proposed changes to the Directory of Assessment Standards Listing and Operational Rules 2011?*

No comments.

*5. Do you agree with the proposed changes to the Consent to Assess against Standards on the Directory of Assessment Standards Rules 2011?*

No comments.

*6. Do you agree with the proposed changes to NZQF Qualification Listing and Operational Rules 2016?*

No comments.



*7. Do you agree with the proposed changes to the Private Training Establishment Registration Rules 2013?*

5.1.3 – Yes and No.

The revised Rule 5.1.3 specifically requires Private Training Establishments (PTEs) that cease delivering a programme or training scheme (either voluntarily or involuntarily) during a study period but are still operating, to cover costs related to transfer of international students (including reassessments, RPL fees, full fees refunds etc), or face deregistration.

We support the proposal for application in cases of voluntary cessation of programmes or where the provider is at fault, deeming this to be a fair business cost. However, we have concerns about the rule applying equally for involuntary cessation of programmes, resulting from situations outside the PTE's control (eg, government policy changes). We consider that in this scenario, it would be unfair to force the PTE to cover the affected students' costs, and that a claim for costs to the Export Education Levy is appropriate.

5.1.3(ac) and Appendix 1 – Yes.

*Questions 8 and 9 on Industry Training Organisations Rules*

No comments.

*10. Do you agree with the proposed changes to the Quality Assurance (including External Evaluation and Review) Rules 2016?*

Yes. No additional comments.

*11. Do you agree with the proposed changes to the Student Fee Protection Rules 2013?*

No comments.

*12. Do you agree with the proposed changes to the NZQF Offshore Programme Delivery Rules 2012?*

No comments.

---

Submission to NZQA by online survey by 27 April 2018: <http://www.nzqa.govt.nz/about-us/consultations-and-reviews/rule-changes/feedback/>

Key contact for Te Rito Maioha Early Childhood New Zealand:

Kathy Wolfe, Chief Executive

[kathy.wolfe@ecnz.ac.nz](mailto:kathy.wolfe@ecnz.ac.nz) | 04 471 6802