

Response to the Productivity Commission's *New Models of Tertiary Education Draft Report*

New Zealand Union of Students' Associations

Thank you for the opportunity to provide further feedback, following the draft report of the Commission. We look forward to the chance to discuss this with you in depth when we meet on the 29th.

A Student Centred Tertiary Education System

In general, we agree with much of the analysis regarding the existing tertiary education system in New Zealand, especially the identification that students are disempowered and that, instead, it is a system dominated and controlled by providers. We are less convinced by some of the proposed solutions that the Commission has put forward in its draft report.

We have worked our way through the document below, and have dealt at the end with each recommendation. We believe that, in doing so, the questions you proposed have all been responded to. Since you asked for specific feedback as to what would be required to put students at the heart of the system without a Student Education Account, which we do not support and has been rejected by the Government already, we address this separately in Appendix A, although much of what appears there is also distributed through the rest of the document.

A student centred tertiary education system will be nationally organised towards the goal of putting students at the centre of all decisions, where students are well-supported and prepared, where student mobility is enabled and which has ease of matriculation, articulation, and credit transfer. It will be one where students are seen as active participants in their own learning, as co-creators of education, where there are outstanding feedback systems informing teaching, the curriculum, and the whole of the student learning experience. It will be one where resources are dedicated to enhancing the capability of students to be these active participants and this is organised on a national basis so that it develops towards consistency in this regard. It will engage with students at all stages of their educational pathways, recognising the diversity of learning needs and desired outcomes, that students will enter at different levels, and will increasingly need to return to formal and informal study throughout their lives.

Chapter 1

Student Ombudsman

NZUSA supports the concept of a Student Ombudsman, as currently there are not consistent student-friendly avenues to address wrongs within TEOs. There are times when our National Office has had to step into complex issues about students feeling they have had an education experience that has differed significantly from that advertised or that should have been expected, and where the students felt that they had no other avenues but to seek external support. Any statutory function that allows for independent assessment of student issues should be able to be accessed instead of any institutional structures (and not be dependent on those being exhausted).

However, robust systems of each provider responding (hearing and heeding) the student voice is a higher priority for us, and would achieve much the same result, plus other additional benefits, for around the same likely expenditure.

Student Education Account

NZUSA believes that the proposed Student Education Account is simply a voucher model of education that we have seen proposed and rejected in the past. Students are already cognisant that their attendance at an institution means the institution gets funding and that if they choose to go elsewhere, the funding goes with them. Accordingly, this proposal provides no additional “student power”, especially since it is really only about the student as consumer and not as a co-producer of their educational experience. Instead, we believe that this proposal will have significant adverse impacts on lifelong learning, student choice, and, perversely, give even greater power to institutions given how much they control the information students have about course choices.

It is our contention that empowering students is not a decision about funding but rather in achieving two great cultural transformations: (1) the recognition, throughout the system, that education is co-produced and that students bring an expertise to the learning environment grounded in their own knowledge of themselves as a learner, and (2) that the student voice needs to be heard and heeded throughout the tertiary system in order for there to be any valid claim as to that system’s quality, and for it to be understood as serving students’ needs. We have developed ideas about how this might look, based on work we have been undertaking in conjunction with different providers and alongside peak bodies, throughout this document.

Chapter 2

Financial Cost

We reject the assumption that parents in New Zealand should be expected to support their children to meet the financial cost of study. Our 2014 Income and Expenditure study showed that only 14.85% of students receive financial support from their parents (*Income and Expenditure Survey*, New Zealand Union of Students’ Associations, Wellington, 2015). This incredibly low level of parental support, despite the assumptions inherent in the student allowance system, for example, should be noted when discussing current and proposed models of funding.

Co-production

NZUSA believes that education should be recognised as co-produced and recommends the Scottish approach of embedded and required student engagement as a national objective. Student Partnership in Quality Scotland (Sparqs) is a great example of a body that supports students to utilise

their voice and back it with sound research and should be investigated to be replicated in New Zealand.

Student Information

NZUSA agrees that the information about tertiary programmes is currently opaque. We understand there are attempts to create transparency with tools such as 'Rate my Qual'. However, we currently feel the majority of attempts to increase clarity are top-down and not focussed on students being at the heart of the system. At the time of writing this submission NZUSA has expressed its concerns that Rate my Qual will be unable to create a useable product for students.

Our own research with students as to their decision-making processes before study shows that the one thing students wanted most before studying was to talk to someone like them about the course that student is intending to study. Currently, Rate my Qual will have no demographic or free text options, thus removing the most relevant parts for students. Instead it will exclusively produce limited quantitative data, and likely not in large numbers. This will not be useful for potential students about to make a significant decision about their future. Our alternative suggestion of empowering student representatives and maintaining their role post-study and co-ordinated through a National Centre for Student Voice, addressed below, would be significantly more useful for students.

Chapter 3

Lifelong Learning

NZUSA believes that tertiary education (from University to trades) is absolutely necessary for many people to live good lives. Figure 3.3 in the draft report is a clear indicator that tertiary study has become the new compulsory for participation in modern society, in the same way that primary and secondary education were seen, and thus it needs to be funded as such (*New Models of Tertiary Education (Draft Report)*, New Zealand Productivity Commission, Wellington, 2016).

Māori and Pacific Achievement

We believe that the low levels of achievement for Māori and Pasifika at degree level is due to the institutional racism that continues to permeate our education system. Careers advice is inadequate and there are numerous examples of students being able to identify times when they have seen careers advice favour Pākehā students and suggest lower level tertiary study options for Māori and Pasifika students.

Careers' Advice

Careers advice needs to start early, and be focussed on what people want to *do* with their lives as opposed to what people want to *be*. It is now an accepted fact that many jobs will not exist over the next few decades as technological developments wreak havoc. Advice should be based on the skills and tasks that people want to see themselves undertaking as opposed to directing towards a specific job.

Our research into the preparation and support that students get before they embark on their tertiary studies shows that this is patchy, and differs wildly from institution to institution, and highly dependent on where they are coming from. Research undertaken in conjunction with Ako Aotearoa, the national centre for excellence in teaching and learning, shows that there is a significant

disconnect between what secondary school teachers and university lecturers understand the others' expectations are, although there are also pockets of excellence.

In fact, this is a feature of the system – that pockets of excellence exist but there are poor systems for making the excellent normal. Greater co-ordination will therefore prove more beneficial than further deregulation.

Our research also shows that the advice that tertiary students receive in making the secondary-tertiary transition is also patchy, and mostly poor. We strongly support recent initiatives that will professionalise careers' advice in the compulsory sector although have little sense that Careers New Zealand has the capacity or processes in place to lead this work. There are some eight different government initiatives in this area, poorly co-ordinated and some quite wrong-headed in terms of alignment with what students are themselves considering in making their post-compulsory choices. In addition, the focus of more than 90% of the spend on careers' advice in secondary schools means that there are large gaps in provision of advice for learners who are attempting to enter tertiary education or training from other directions.

What students have told us, in our extensive discussions, is what they would most like would be to engage with students who have previously undertaken particular study, and that they wish to be freed from a provider-dominated system which is based around advertising not information. We believe that this could be an outcome of the national centre for student voice, and address this elsewhere.

Student Mobility

The current system traps students geographically and within the institutions and programmes that they initially embark upon, even though the likelihood that they will end up completing that initial choice is less than 50% (refer poor advice above). This despite that, in the university systems at least, the quality of provision for initial degree-level study is uniformly of high quality.

There are three significant barriers to enhancing student mobility.

1. At exactly the level where it does matter where higher-level qualifications are pursued, ie post-graduate study where for logical resource reasons capacity is limited due to specialisation, students lose financial support. This is particularly significant for those students who receive student allowances during their undergraduate study, or who may wish to return to high levels of study after some time in the workforce. These students will experience large reductions in income. This is proving to reverse gains that had been made in the allied health field where a lot of work had been going into making the health workforce look more like the New Zealand population and where post-graduate qualifications are considered entry level.
2. Provision is inconsistent at the sub-degree level and students, particularly in provincial areas, have limited choices without undertaking either long commutes or shifting away from the financial and pastoral support that is available at their familial homes. We recommend that the polytechnic sector be re-organised to ensure a minimum level of provision in all geographical centres, with agreements in place so that the study so undertaken can be extended, should the students desire such, only when there is certainty around objectives and the student's investment (financial and time) is well understood. This will mean that programmes will need to be available where the current requirement for economies of scale would not permit on financial grounds.
3. Recognition for study at other institutions and even within other programmes within an institution is ad hoc, expensive and is not encouraged under a system where institutions are

rewarded for holding onto unhappy students, and have carte blanche to impose their own recognition of prior learning rules. We note that the proposal that institutions should have greater flexibility in developing and naming their own programmes would make this worse, and is in the opposite direction of the TROC, an initiative which we believe is important to enable student mobility.

Part-time Study

New Zealand should continue to celebrate number of students who study part time. This is a feature of the accessibility of our education system regardless of the background of the person studying. The flexibility of the study workload and location of study provides support for those who are older, women, or younger people eager to upskill once they had turned twenty. New Zealand continue to have a funding model that allows for people to study at a time, place and age that suits them rather than emphasising high school graduates in full time study.

University Entrance

We accept that the title “University Entrance” is problematic. Its name creates a sense of superiority for university qualifications and, for many students, achieving UE becomes a more important goal than achieving NCEA Level 3. We recognise the problem of focusing attention on university as a destination for many students for whom that is not necessarily the best option. However, we believe that we need to address professionalising careers’ advice and an increased understanding of graduate outcomes as the most appropriate response (and through improved conversations between industry and providers). We are also concerned that making it instead “Degree-level Entry” would erode some considerable advances in creating pathways and other alternative entry criteria at polytechnics for students who can achieve degree-level study but have not been well-served by the compulsory sector. We believe that there should be national standards for entry into qualifications that give a clear signal to students as to what they need to achieve, and do not discriminate against them based on location.

Fee Deregulation

NZUSA is opposed to fee deregulation. New Zealand has had a deregulated fee market for a period of time and it was re-regulated for a reason. We agree that the fees structure is currently unsustainable but we know that any increase in fees will drive students away from tertiary study, the vast majority of whom are forced by financial and other considerations to study at the closest TEI, if not TEO, to their home. We are concerned about the ability of some providers to charge whatever they want, and for the quality implications of low-cost provision given current funding levels. Other countries’ movement towards fee deregulation have been shown to further embed the power of the already most powerful providers. Coupled with the current tertiary education environment where employers say graduates are not ready for work, and debt is already a significant burden, will increasingly result in students re-assessing the worth of tertiary education and not necessarily making good choices in the national interest. We are also conscious of the implications of fee deregulation when students leaving the compulsory sector have such low levels of financial literacy, where so much information about programmes is held by the providers, and given the very low level of transparency of the respective benefits of different programmes.

Equity Funding

Equity funding is also an essential part of supporting students who have increased needs and needs to be considered as well as any tuition support. This is increasingly inadequate and this is producing negative outcomes. We note the TEU’s research that has found that white-streaming, itself argued for

by providers on the basis of constrained equity funding, has had a pervasive effect on the support able to be provided by dedicated Māori and Pasifika staff. We are also aware that disability funding fails to keep up with the needs of students and that many disability support staff members have been able-streamed into generic academic support roles.

Currently, at some institutions, all students fund through either their tuition fee or their Compulsory Student Services Fee the balance needed to provide for what are considered adequate support for students with additional learning needs. At other institutions the equity funding is all that is available for these services. This creates perverse incentives which leads to some institutions to recommend that students attend other institutions than their own, and also means that there are students not getting the support they need, which if they got then they would be more likely to succeed.

Enrolment by Qualification

We agree that enrolment by qualification is problematic in allowing students flexibility. It is well-known that Massey University in particular suffers from this because many students choose to study by distance only to cross credit papers to another qualification at another institution. The provision of a flexible student centred education should not result in the detriment of the institution. Additionally, in our changing world many students are taking a small number of essential papers to ensure they have the skills to remain employable, or they are doing it purely for enjoyment. The limits to Certificates of Proficiency could be creating a barrier to people accessing exactly what they want from their education.

Motivation for International Students

Our 2016 Income and Expenditure survey has shown that international students are most motivated by cost, and whether or not the particular programme they wish to study is available. They are least motivated by institutional advertising and perceptions of the quality of research undertaken by the institution. Despite the rhetoric, international students come to New Zealand because it is “good enough”, and based on a price analysis at least as much based on the cost of living as the cost of the qualification. We are concerned about the implications of increasing investigation into tertiary education being seen for many students as an immigration pathway instead of an educational opportunity, especially given the reliance of virtually every institution on international students for their financial sustainability.

Chapter 4

Tertiary Employment Gap

NZUSA agrees with the Commission’s analysis which has found a gap between the skills and attributes possessed by graduates from a wide range of institutions and what employers are expecting. Part of this we believe is due to institutions resisting business participation in setting the desired graduate attributes as to their needs and experiences, and the failure of programmes to actually address those graduate attributes. However, we believe a more significant aspect is due to the failure of institutions to listen adequately to students and graduates.

Earlier this year NZUSA co-hosted a hui with PPTA and NZEI involving students about to enter the teaching workforce. Many of these student teachers did not feel equipped to be a teacher. Some concerns that we heard included: a lack of foundational teaching skills such as lesson planning, poor education around implementing Māori tikanga into their teaching, and inadequate preparation for working with children who require additional support. The latter has been confirmed in the more

recent discussion around seclusion and restraint. Another finding was their concerns that student teachers were taught to assess skills in a number of different ways, yet their own assessment was limited to essays and exams.

The concerns raised about assessment is one that students feel strongly about. The bulk of programmes continue to use essays and exams as the primary method of assessment, when desired graduate profiles will require different assessments in order to have any credibility. Education researchers in tertiary institutions contribute extensively to assessment methods across other levels of education, yet we struggle to adapt this into our own education. This needs to be changed if institutions are genuine about creating a graduate that can, work as part of a team, be able to present complex ideas to groups of people, and demonstrate competence in working with a range of people from different backgrounds. These are not uncommon as published graduate attributes, yet an essay or exam would struggle to assess them.

NZUSA is developing a work programme of engaging with professional bodies to require graduate feedback into industry-specific qualifications. Undertaken well, this would result in the positive features and gaps of a qualification both being highlighted, with inbuilt quality enhancement systems providing for institutions to demonstrate how they are responding to the feedback given. Much of this feedback, if implemented, would lead to students being considerably more prepared for post-study life. While we understand that tertiary education is not exclusively about getting a job, certainly vocational qualifications do exist to fill specific vocations, and the overwhelming majority of students expect better job prospects as a result from their tertiary study. Creating the feedback system referred to would be far more effective than a simple satisfaction survey such as Rate My Qual, for example.

While NZUSA has a plan to work in this space, it will necessarily be piecemeal and slow, we believe it is crucial that a National Centre for Student Voice be established and funded appropriately, and that this role of exploring graduate outcomes be seen as part of its work. The work we have done in the past few years with minimal resourcing has given us some footing internationally on the topic of student voice. The direction of our current work could very easily see New Zealand as a leader in the areas of graduate and indigenous student voice.

While it is an issue that institutions see their job as finished once the student has graduated, there also needs to be better understanding of the obligation on employers to continue to train graduates once they enter the workforce. While some of this may take the form of continued formal tertiary education, it could also look like appropriate workplace-based training to ensure graduates have the job specific skills. Too often there is an expectation that a graduate is a fully-formed product. This is unrealistic given the wide scope of jobs available and the continued threat of disruptive technology on many jobs requiring adaptability.

Significantly, we have heard from many employers who have told us that the graduates they desire the most are students with a Bachelor of Arts. These students are often seen to have the greatest level of transferrable skills to be able to adapt to any situation, yet the Bachelor of Arts continues to have a public stigma about it of being a useless qualification. There needs to be more promotion of graduate attributes and work between industry and peak bodies/providers about what these should be. This would also be helpful in understanding the respective benefits of applied vs research-based degrees.

RPL and Cross-Crediting

The ability to utilise RPL or even cross-crediting is disappointing. We believe to assist in cross crediting there needs to be the implementation of articulation agreements between ITP's and Universities to expand provision and assist with continued study. During the Commissions research we have shared examples of institutions that have inadequate structures to even transfer students learning to a lower level qualification (i.e. a Bachelor of Nursing, and a Diploma of Nursing).

We believe that recognition of prior learning will become more prominent as some jobs continue to disappear, and as vocations become professionalised. One example that we are concerned about in particular is Social Work. More and more employers are requiring employees to be registered social workers, and Parliament has discussed more than one Bill focussed on compulsory registration. A component of registration is that a person has done a four-year Bachelor of Social Work. While many qualifications have changed to adapt to this, there are still a number of people in the workforce who have worked as social workers for a number of years now being pressured to undertake a four-year degree (often at their own cost). This seems a case of putting the need before credentials in the place of any measure of their competency.

Chapter 5

Funding Mechanisms

As noted above the funding mechanisms are complex and difficult. NZUSA believes in free tertiary education for all and disagrees with any moves to further put the financial burden of tertiary education on the individual. We note in addition, that the greatest cost to students already is their time. Further, we are extremely sceptical of findings about the financial return of tertiary education to the individual based on comparing those who leave school and do not go into tertiary study and those that do as if they are the same in all respects other than the tertiary qualification.

The Student Loan Scheme

The current structure of the Student Loan Scheme (SLS) is burdensome for students and graduates. Low wages coupled with low repayment thresholds and high rates has resulted in people feeling their student debt is keeping them from home ownership, starting a family and preparing for retirement (*Income and Expenditure Survey, 2015*). Repayments at anything above the minimum would only exacerbate the hardship that graduates face. Those who do may repayments above and beyond the minimum are often those who have parents who pay off their debt for them. This is a significant equity issue, especially given the cap on the parental income threshold for the Student Allowance Scheme.

There are currently some areas where access to the SLS needs to be more flexible. One area we heard earlier this year from our combined NZUSA, NZEI, PPTA hui was that the process of become re-registered as a teacher following time without a permanent position was a significant cost and "frankly anti-women". Teachers whose registration lapses are required to pay \$4,000 to undertake a course to be deemed competent. This \$4,000 is unable to be funded by the SLS as it is not a qualification. This sum of money represents a real barrier for someone whose choice to return to teaching, and therefore their need to study, is primarily due to a worsened financial situation.

Provision

In regards to the regional provision of ITP's, we currently see whole-of-systems understanding with respect to the mergers that have taken place. We would rather mergers take place in a national context as opposed to a regional context if they are to occur.

External Evaluation

We believe that the New Zealand tertiary system has a better approach to evaluation than the Commission gives it credit for. We support a continuation of an enhancement focussed approach as opposed to focussing on minimising risks. There should still be structures that allow risk to be picked up, but continue to strive towards improvement as well as new and innovative approaches to the academic experience.

CUAP

We agree that the number of times it meets in a year may be a limit to the CUAP process, although we are not convinced that courses developed too quickly are necessarily in anyone's interest, particularly students. We support the peer review methodology and do not believe that it is anti-competitive, and in particular commend Universities New Zealand for ensuring that there is student representation in course approval and external evaluation systems that they manage. We would however support CUAP being invited to consider if there would be advantages in it meeting more often. It is further our opinion that ITP's should have greater autonomy and adopt a system more aligned with CUAP, with a return to the approach that existed with a unified ITP body and the ITPQ.

Advice to Students

The advice given to students is substandard. As discussed above, we know careers advice is broken and information for people entering tertiary education continues to be fragmented and consists of underused layers of information that isn't applicable or given at the right time.

International Students

Despite a code of pastoral care for international students, we feel diagram 7.5 in the draft report (NMTE, 2016) highlights the real priority for universities, i.e. using international students to boost income which can be used to boost rankings, which will then draw more international students. Students and their educational needs should be at the heart of the educational process, rather than any revenue that they might provide.

Chapter 6

PBRF and Research

NZUSA believes that the PBRF has perversely affected tertiary education. It has changed the priority of (primarily) university education even further towards research and has had a detrimental impact on teaching. While we believe research is important and should continue to be part of our legislative foundation, PBRF has seen an academic landscape that is focussed on hiring academics with good PBRF scores as opposed to their fantastic teaching background. This is affecting the quality of our education. We believe that teaching and research should be interwoven, but do not insist that all academics MUST teach or MUST research to the detriment of one. Nearly any student you go to has heard the line that a lecturer can't assist them as they've "got research commitments". In addition to that there's the whispers of fantastic lecturers who have been punished as they haven't done enough research.

Research informs teaching but it shouldn't overwhelm it. The tertiary landscape allows few opportunities for great lecturing to shine. NZUSA has been involved in the Tertiary Teaching Awards for the past few years and hold great value in it. Looking at the results of the past few years, a trend emerges that at nearly every institution, academics strive to be the best out of their own goodwill.

With the current funding model pushing a consumer-pleasing experience year on year, there is no incentive for brash and bold innovation or disruptive practices, however valuable they might be.

We are concerned at any proposal that would strip the requirement for degrees to be predominantly taught by people who are actively engaged in research. We believe that teaching suffers under the current model, and we believe that the understanding of what “research is” is too narrow – being focused on PBRF measures of research which is essentially publication – however our graduates exist in an international marketplace and we would not wish to see students receiving inferior qualifications which are not transferable internationally.

Innovation

We are not convinced that there is a lack of innovation, but rather that the problems are to do with ghettos and silos, and where innovation carries the risk of failure that systems are ranged against it. However, if institutions were told that innovation was expected, and their EER and AQA processes required them to demonstrate their commitment to innovation – ie it became a key expectation for the sector, then we believe that innovation would be unleashed.

In addition, NZUSA believes innovation in the tertiary sector could be further enhanced by recognising it as an academic pursuit. In academia ideas are trialled and tested. The reality is sometimes these things fail but this does not mean there is no learning to be had. Rather, there is an analysis of why the failure existed, including recommendations for further study. If we had a fund for teaching innovation this would allow people to test innovative teaching in a space where failure was not punished. We believe this fund would also help shift the focus away from PBRF and institutions would clamour to be known as being the most innovative teaching institution in New Zealand.

Staff morale should be a priority. Tertiary staff members’ working conditions are students’ learning conditions. For us to succeed, we need academics who are passionate but who are also satisfied in their roles, and who have job security. Current practices of intrusive managerialism and constant employment reviews create instability for students as well as staff.

Chapter 7

We believe in a barrier free education. Too many people in our society are unable to access tertiary education, be it due to disability or poor education at earlier years.

We find MSD’s approach to NEET’s concerning. We have heard multiple stories, in particular from regional ITP’s where people have been told they must go into study or face losing their benefit. These students have come to our attention when we find out they lack basic literacy and numeracy skills to the extent they are unable to fill out their Studylink paperwork. Given this information it could be questionable as to whether these people will pass without *significant* resourcing. Given that such resourcing is rarely available, institutions are in between a rock and a hard place when it comes to accepting these people. Tertiary education is the new compulsory so all people should be resourced to achieve at that level, whether they become a professor or a plumber.

Funding should support classes to be small where they are most crucial. Places where health and safety is a pertinent issue or where higher staff intervention is required to ensure a quality outcome. Funding needs to be equitable not equal.

Chapter 8

Performance Measures

NZUSA has concerns with funding penalties which might encourage institutional cultures of passing students who do not meet the requisite standard. While this may have very little difference in some fields, there are others such as helping professions where it would be deeply concerning to see grades being pushed up.

It has been identified that the fixed requirement for financial surpluses causes issues. We would support the removal of this cap, and would instead recommend that institutions instead are required to have reasonable financial plans over a longer term horizon.

Advertising

We find the level of funding spent on advertising to be appalling. This funding is students and taxpayers' dollars and is used to try and win EFTS as opposed to promoting tertiary study itself. At best advertising shifts students from one capped institution to another, making it a poor spend in terms of national priorities, and the initial findings of our 2016 Income and Expenditure survey shows an institution's advertising campaign was one of the least influential factor in choosing a place to study, suggesting it a poor business decision as well.

NZUSA believes if we are to have an education system that works for all people it needs to have assorted kinds of delivery. We like the concept of an education model that allows for a tuakana-teina mode of delivery.

Diversity

We believe market competition has created homogenisation of qualifications. Traditionally, there has been the expectation that if you wanted to do a particular qualification or specialisation then you went to a certain institution. This exists to a lesser and lesser extent, and the funding based on EFTS has created "Fear of Missing Out" amongst institutions. In addition, competition has led to the collapse of whole disciplines as student numbers get spread too thinly, followed by all institutions at once deciding to reduce provision. Nobody wants to be institution without an engineering school, or without a post-graduate qualification on 'big data', lest they miss out on EFTS. A funding model that will celebrate difference and specialisation needs to be investigated, this will involve central planning – and the allocation of specialist programmes – rather than leaving things to the market.

Articulation

We believe the Scottish model of articulation should be seen as an example to aspire to. Their flexibility allows for generic lower level study (often at regional technical colleges), with the option to move to another institution later and use that opportunity to specialise. We need to support students to be able to pick an education at the time, place and institution that suits them.

Increasing Costs

We are concerned about the interpretation of Finding 8.13 in the draft report. We agree that increased costs can often not result in an improvement in outcomes, yet this report also suggests in other sections that fee deregulation would support innovation. We are more inclined to believe that if some institutions had deregulated fees they would use it to pursue a better ranking internationally. We believe there is no evidence that deregulation would shift any university from its current business model of imposing the greatest possible fee it can on students.

Quality Control

Academic offerings should be subject to some form of quality control and we understand that some industries are so rapidly evolving that setting exact parameters would quickly become burdensome.

We believe all papers should be able to demonstrate broad academic outcomes or proficiencies it expects students to have at the end of the paper. Papers should also have assignment structures that match these proficiencies. If these papers have no fixtures, then the quality could vary significantly year to year due to the lack of academic rigor to support them. If we prototype papers before accreditation, what assurance do we provide to the students undertaking this study? Do they get a refund? An apology? There is a need to balance innovation with protecting the large investment that students are making.

Chapter 9

Gendering

We believe that a significant amount of the gendering between qualifications is about the stigma around these qualifications. While nursing, teaching and social work are 'women's work', male dominated disciplines can be completely unwelcoming to women. We have heard of instances where women have done qualifications and walked into their class only to be questioned by their academic if they are in the right place. Another example consisted of a student being asked by her lecturer (who had failed to recognise her as a student of his) if she had pushed the wrong elevator button as the floor below was for a helping qualification.

Returns on Tertiary Study

Q9.1 We know if a student studies at a higher level they often earn a better income than someone without any tertiary education, although note our concern about the conclusion often drawn from this. Yet, if the qualification itself is responsible for this, then this income is often what provides the key to participation in society. Those who are on benefits or minimum wage struggle to give them and their families the basic access to participation. The Living Wage campaign talks of people who can't afford to send their child to Saturday morning sport because their fees went up \$50 for the year and this parent found this increase to be incredibly burdensome. This inability to participate create poor outcomes for many in our society.

NZUSA believes the larger number of women in tertiary education is for two reasons. Firstly, the New Zealand population has slightly fewer men than women. Secondly, many of today's students are still first in family and young women could be the first in their family to achieve at a tertiary level. This creates a level of transference, where a maternal parent either had no qualification and desired a different reality for their daughter, or a maternal parent felt their tertiary education was transformative and the reason they were able to succeed. The power of feminism should not be underestimated in tertiary education.

Civics

Civics education in New Zealand varies considerably. In some locales it is alive and kicking, in others it's a non-discussion. We believe the shift towards the neo-liberal concept of the individual continues to strip the idea of collectivism from our society. Students head to university because it's good for them, they get a job that is good for them, if they choose to participate in society it's for their betterment. The concept of the collective is much more powerful and changes the idea of community. At a systems level we should return to a model that supports the collective and educate individuals about who they are in the world and what their contribution could be. The new Bachelor of Arts at Massey University has made moves to recognise the importance of self in context.

Academic Freedom

As students' organisations have struggled to work with and critique the institution that funds them, so does the institutions struggle to critique the government. If academics provide robust peer-reviewed and taxpayer funded research to government, it should be the responsibility of government to heed this research. Additionally, there needs to be a welcoming from government to indicate they want to hear the 'critic and conscience' and that all funding relationships are separate discussion. We can't have a system where Vice Chancellors will highlight funding restraints through annual reports or in council meetings, but are unwilling to take a defiant stand and demand a greater level of funding.

Chapter 10

Operating Costs

Q10.1 We are not convinced that the operating costs of tertiary provision is increasing in real terms, or needs to be, although we are particularly aware that the costs to students have been. One feature is that government funding has been targeted into specific disciplines, encouraging providers to spend more on those disciplines, but to raise costs across all students. None have followed the additional investment in programmes that the government says it wants more students with a reduction in the costs of doing those courses. Another feature of the current tertiary education landscape is increasing compliance costs, and spending on areas of dubious benefit (advertising, gaming ranking exercises, spectacular facilities...).

Technology

We know that technology is changing the world and that it is not just low skill jobs on the block. Professions such as accountants are slated to become less relevant as software becomes more automated and while people may feel uncomfortable about a robot doctor, this is not a radical thought. We know people are going to need to upskill and retrain, but the government has systemically lowered eligibility for people wanting to study, especially if they are over a certain age or have studied before. Tertiary education needs to adopt a revolving door policy and it should be funded to meet this need in the future.

Chapter 11

Student Feedback Systems

We believe a well-functioning class representation model that is supported fully by academics allows for changes to curriculum in real time. It should be able to change content based on the current socio-political context, have flexibility to take time over challenging concepts and spend less time on those that the particular students grasp more quickly. Every class is different and thus academics need to be supported to create systems that are responsive and appropriate to students' needs.

Current online fora are often poorly utilised and academics despair when students desert it for Facebook. Institutions need to support their academic staff when it comes to content creation and dissemination. Good use of online forums is an art and one that academics should be able to delegate to a single point. Institutions need to support academics with content plans and posting strategies. A paper should be treated like a campaign. The concept of both is to convey a point and create action.

Retention

When it comes to retention NZUSA feels there is a significant portion of students who would have succeed if they had been identified as being at risk. However, institutions feel intervention activities would be too resource intensive or identifying someone as 'at risk' will just predetermine their failure. However, research consistently shows that identification of students who have mitigating factors and implementation of supports works. Retention programs could be supported with the innovation fund we discussed above.

Professional Registration Bodies

Note that we disagree with AUT's recommendation to limit control of professional registration bodies over degree contents. Any disconnect between these two is going to result in poor outcomes for students. If an institution deviates from the body's standards students may be unable to be registered once qualified. The institution and the body must be interwoven. Study should work towards supporting registration, be it through taught work, placement structures, or assessment outlines that match the registration process.

Chapter 12

R12.1 We agree that there is a considerable number of statutory bodies involved in the tertiary education sector. We would support moves that encourage these bodies to meet regularly with crucial stakeholders and have robust discussions to talk about developments and issues arising. This discussion could solve many problems and would leave the sector much better informed.

R12.2 We find minimum standards to be problematic. Our work in implementing minimum standards under the RTA this year has shown that minimum standards can be a very low bar to step over. Any discussion regarding quality should be quality from the perspective of the student, as it is clear that a student and an institution have very different expectations. Our discussions with Australian student representatives earlier this year demonstrated significant discontent with the teaching and learning experience at end one of the top 50 universities in the world.

R12.3 We do not support limiting review to a risk focus in supporting education quality. While there needs to be some checks and balances, a risk focus will keep people in a state of compliance as opposed to accepting a certain element of risk that comes with innovation. Quality control should be based in enhancement.

R12.4 We agree that there should be more information about value-add. It is our understanding that the TEC is working towards a vision that sees their content being used in multiple ways, which includes data about where students go between secondary and tertiary, and who those people are.

R12.5 If we wish to have a model that supports students to move to study options that suit them, we need to change the way we recognise completion. Whether that becomes more granular and is based on paper, semester/term, or year completion is something that could be investigated further. This would acknowledge the work the institution did while they had the student enrolled with them.

R12.6 We believe a qualification can often be made of bits from different organisations. While we understand there are issues with someone who has done 2.5 years of a BSci at Victoria wanting 0.5 years of a BSci at Otago to give them a BA from Otago, we would like to see a greater level of paper transference, especially between ITPs' and between universities respectively. We understand that it is more difficult between ITP's and Universities, but see a high functioning NZQF and articulation agreements creating better systems of flexibility. We understand that the funding levers need to be right to support this though.

R12.7 We agree with removing the current performance linked funding, although not with the suggestion that they be replaced with minimum standards. We believe that all providers should be held to the highest standard and that they should be audited – and assisted – to have the strongest possible student voice systems, good governance including highly-functioning engagement mechanisms with academic and professional staff, and thereafter operate on a high-trust, limited compliance-based, system.

R12.8 As mentioned above, we do not think that minimum standards will enhance quality, it will simply weed out the worst organisations, and do nothing to enhance the performance of those which are not performing terribly. It will also face significant pushback from institutions who will lobby to make the standards so low they could be stepped over.

R12.9 We wholeheartedly support reform of the careers advice system. It *must* be holistic, start early, show clear pathways to future careers and take note of future trends.

R12.10 Consolidation of the information currently being provided to intending students is necessary. We understand there are approximately eight different tools designed to influence decisions about where and what to study. These tools need to be assessed in context and be combined or discontinued to streamline the level of information provided.

We do not support a model of tertiary education provision that is overly centred around funding based on student demand, given the appalling careers advice given to some students. We know that people moving into tertiary study wish to have more freedom to study what they choose. However, if you talk to a final year teaching student they now very cognisant of the fact that only 15% of teachers get a job. Once in study, the priority of students changes and they want a qualification that has outcomes that give them prospects. While some graduates could head overseas where there is more demand for their qualification, they are punished with burdensome repayment conditions on their student loans. It's perilous to assume that anecdote will equal accurate filling of high demand professions. We've heard numerous stories that in a few years we will face a crushing shortage of nurses, but then heard from others that a particular DHB is looking to cut fifty nurses from its books.

Publishing post-study employment rates does not achieve the desired dampening of demand for courses where students are driven by their desire to serve. For example, when a class of primary school teacher trainees are told that only 15% of them will get jobs within 3 years, they all think that it will be them, given their motivation. It would make more sense to actually limit entry since we know five years out how many primary school teachers will be needed in any given year.

Wage levels are also poor indicators for demand. For example, a social work student is told on more than one occasion that their job won't pay well but their work is beyond value. In this and other helping professions which are dominated by women the wages are paid by-and-large by government. It is their choice to underfund certain sectors, or ignore public need and suppress expenditure by not employing much-needed staff.

Given that there are currently examples of institutions 'giving' qualifications away and brokers are rife in attracting international students to PTE's (in particular), creating student demand qualifications will only exacerbate this.

NZUSA recommends that workforce planning be more thoroughly investigated. Without accurate workforce planning an institution will gladly create qualifications that students want but if they fail to produce people to fill employment gaps then the system has actually failed. Our current system of lurching from surplus to shortage shows that we need to find where the shortages will be before they

appear so we can discuss with potential students their plans for study and what their prospects will look like.

R12.11 We find the proposal to move entirely to self-accreditation to be wrong-headed. There are institutions which, if able to self-accredit, would undertake decisions that are without context to the sector, or even out of context of their own institution. This is especially concerning given the drive for promoting international rankings. One example is the knowledge that a medical school increases international rankings. We have two in New Zealand and the common acceptance is that two was enough to provide the level of doctors necessary without burdening the system. However, Waikato's recent decision to propose a medical school has thrown a cat amongst the pigeons. We are sure that this proposal will be put through robust discussion at CUAP to ensure that it will create quality doctors. However, if Waikato could self-accredit they could set up shop tomorrow.

We understand this is an extreme example but without an external body to keep watch a provider could undertake moves to hide failures or push popular qualifications without focussing on where these qualifications will lead. We do not believe a self-accreditation process is appropriate in a sector where people are interested in building the biggest kingdom.

Further, coupled with the proposed fee deregulation, we believe that institutions will be insulated from their poor decision-making and that students will end up paying for it.

R12.12 NZUSA supports the continued statutory role of the New Zealand Vice-Chancellors Committee. NZUSA sees significant value in CUAP and AQA, not least of which that we have had student representation on these committees for a number of years and value our relationships with these bodies. We would support ITPs having a similar devolved role, and with a similar requirement for student representation.

We support CUAP considering the benefits of it meeting more frequently, and would envisage a less competitive funding environment resulting in even greater levels of collegiality. As for AQA, we find their enhancement focus to be refreshing in a sea of risk-focussed audit systems. We have found AQA to be warm and receptive to changes and improvements including the potential appointment of a student auditor and a greater focus on student voice. These are discussions we have had being well aware that this year will mean the end of Cycle 5 of the AQA audit process. If the Commission believes AQA could work more effectively, we would recommend a relationship that focussed on creating an audit model that works, without throwing the baby out with the bathwater.

R12.13 Again, we approve of any process that assists in the appropriate reduction of programme approval timelines. However, we feel this could be done without the loss of processes that support quality.

R12.14 NZQA should be able to support delivery to change locations within a campus without an approval process. Where multiple campuses are involved we would support a process where NZQA is notified and shows evidence that there is thorough genuine student consultation and that any concerns raised are mitigated.

R12.15 Agree although it seems this is already happening.

R12.16 Our research with students show that students do not consider it a priority for the academics to have a qualification in tertiary teaching. However, they support a system that provides a high quality, high level of professional development. Many a student would be able to regale you of a story where an academic is unable to use the AV equipment in a lecture theatre, and there are still some

instances where academics teach using OHP's. Professional development should cover the 101 of teaching as well as good pedagogical theory.

We want a system where teaching is valued, where it can be recognised and where there are requirements for professional development, in the same way that there are expectations for continuous improvement for any other learning professional. We do not however believe that tertiary teachers need specific teaching qualifications, and that this would in fact inhibit some of the things that students value from their current teachers. We support the current initiatives Ako Aotearoa have been making towards enhancing and recognising quality, and believe that these need to be nationally mandated rather than embraced only on an ad hoc and voluntary basis institution by institution.

R12.17 We feel the relaxation of the requirement as to research-led teaching to be complex. There are some fields such as medicine where we would agree research led teaching is essential. However, there are fields such as teaching where our work with the sector would lead us to believe that research-informed academics produce better graduates. We know of schools that have traditionally preferred teaching students from Otago University as their College of Education resisted moves to employ people with PhDs and instead focused on employing people with good teaching experience themselves. We would support colleges and programmes having greater involvement in this discussion rather than having a blunt rule enforced.

R12.18 NZUSA supports the notion of a Student Ombudsman. We would support this service being free to ensure there are no barriers to making a complaint. Our concern is that even a \$20 charge would be inhibitive enough for students to not make a complaint. It is important that students have an independent legislated body that exists to investigate and hear their complaints.

R12.19 We believe there should be some format that allows for institutions be held to account in instances of dominant or poor behaviour. There are instances of their behaviour that would be scorned by the Commerce Commission if the Commission had authority over them. Forcing a student in a hall into exorbitantly costing antiquated internet plans is one example of where an institution will force a monopoly.

R12.20 TEIs are crown organisations and should be subject to crown control over some financial decisions. They do not exist in a vacuum and should not be treated as independent from government oversight.

NZUSA does not support the model of transferring crown assets to TEI's. In the instances of the Colleges of Education of which two have gone up for sale in nearly as many years, this land should have been land banked in the same way that other education sites are done, thus allowing for local Iwi to make claims to this land. While we understand this process can be time consuming and may see functioning buildings unused, the crown has an obligation to play their part as tiriti partner and make genuine efforts to support Māori to achieve tino rangatiratanga. Further, if the assets are not required for treaty settlement they may serve other local or national interests.

Q12.4 Government should not deregulate fees. There is a reason that fees were regulated after a period of deregulation. We do not believe that *any* form of deregulation would see any institutions focus on keeping fees low to minimise student debt. Since the implementation of the fee maxima, institutions have *en masse* consistently increased fees by the maximum allowed.

We do not believe that high fees equal high quality. Our Income and Expenditure survey shows overwhelmingly that the number one reason people study at the University of Auckland is because of its location, followed by the particular programmes it offers. International rankings are not *the*

motivating factor for studying at the University of Auckland, despite the message promoted in advertising.

If given the opportunity all institutions will raise fees as much as they feel will be tolerated. We know that in a vacuum of information, cost may even be considered indicative of quality. Yet it is far from always correlative. We believe instead that better knowledge of students options would lead to better outcomes and this should be the focus for enhancing student choice. Additionally, student debt is less often a front-of-mind concern when students enrol, given the very low levels of financial literacy. Once they near competition however, they despair at the overwhelming level of debt that they are in.

R12.21 We think this is problematic as the institutions have established themselves, on the land that they inhabit, based on an understanding of the situation regarding rates and it would create an unnecessary transfer that students would end up paying for.

In addition, we have no problem with their being a competitive advantage for TEIs vs private since public institutions serve different objectives and have different responsibilities.

R12.22 We support this recommendation. Where the upper limits exist it has penalised students. One example is aviation at Massey University. Students are required to pay approximately \$10,000 a year on top of their student loan contributions. It has been told to students that this is a way to curb demand as too many pilots were being created. This has essentially made aviation a pursuit for those with wealthy parents as the semester timelines allow for little opportunity to earn external income. Additionally, this is a failure to appropriately cap numbers when it is known that a number of students will be getting into massive levels of debt as well as fronting up a significant additional contribution, only to find their employment prospects are average due to a flooded market.

R12.23 While we recognise that “University Entrance” is problematic in terms of focusing attention on university as a destination for many students for whom that is not necessarily the best option, we believe that we need to address that through professionalising careers’ advice and an increased understanding of graduate outcomes. We are also concerned that making it instead “Degree-level Entry” would erode some considerable advances in creating pathways and other alternative entry criteria at polytechnics for students who can achieve degree-level study but have not been well-served by the compulsory sector.

We believe that there need to be nationally determined entry levels for programmes, and a flexible system of provision that students who meet such standards can attend the programme and institution of their choice. This will give students certainty, and the development of the entry level standards encourage national conversations around the level of preparation that is required, including between tertiary and compulsory sector providers.

We believe that one of the purposes of (particularly regional) polytechnics is to prepare students for success at degree-level study, and where the students learning style is better suited for that study to be in a university that this should be enabled. All tertiary institutions should have clear articulation agreements with one another on a reasonable regional basis, and these should inform curriculum such that students are able to progress through a three or four year programme seamlessly and within the timeframe that they initially understood.

The current system also restricts options for university students. One example is the AUT Sport and Recreation programme that is provided at NorthTec. This is a three-year degree taught by NorthTec staff, each year at NorthTec is transferable into the equivalent at AUT should a student wish to transfer but at NorthTec alone, the student can exit after one year with a Certificate, after two years with a Diploma and after three years with the Degree. The current TEC rules that limit universities

teaching below degree level programmes limit AUT students choices. If they choose to move from first or second year into employment, then they leave with no qualification.

We have already provided the Commission with information regarding the specific issues that have emerged within a programme where students completing the first year of degree level study cannot be transferred to the first year of diploma study within the same programme. We do not believe that this is isolated. In that case no course is transferable, instead students are required to make applications on a course-by-course basis for recognition of prior learning, and no more than 25% of what they have already studied is transferable. We believe that credit transfer requires a major overhaul, and that any fees charged need also to be nationally regulated so that institutions are no longer encouraged to use their processes to impose barriers to students' logical educational choices.

R12.24 A significant issue for the New Zealand system is the lack of coordination and oversight, and this is no more so than in the area of student engagement, although there are other issues too. We need to have a national conversation about how many institutions we have, where they are located, what they offer and how they relate to each other. A case in point is the current merger frenzy amongst regional polytechnics. There is no sense as to what the desired outcome of this endeavour is, and it seems piecemeal at best. Similarly, the race to set up shop in Auckland. We are not convinced of the benefits to students of either. With respect to the Auckland satellites, almost all students on satellite campuses feel poorly served in comparison to those on the "main campus". Finally, there are only poor arrangements between institutions that make up the different sub-sectors, and the 130,000 students engaged in work-place based training are disconnected, at best, from formal institution-based learning.

When Scotland desired to review its College (so the equivalent of our polytechnic) sector, it came up with a national plan, organised Colleges into 25 regions, and required each to have articulation agreements with Universities (and for the Universities to have articulation agreements with the Colleges). Identifying that student voice was far less developed in the College sector than the University sector (as it is in New Zealand) the Scottish Funding Council resolved to invest in a multi-year project to enhance student voice in Colleges.

The latter was a natural outcome of another national initiative, to put students, and their voice, at the centre of the system. This was done through the National Framework for Student Engagement, which sets out national goals, and, recognising that this would need additional capacity (see below) the Scottish Funding Council also resolved to fund a national centre to build capability and capacity within institutions and students' organisations to enhance student voice through Student Partnership in Quality Scotland. This initiative is one that we highly recommend for New Zealand too.

R12.25 NZUSA is sceptical that opening barriers would result in Harvard or MIT setting up shop in New Zealand. Opening up the gates in other countries hasn't seen this happen. We would expect that doing so would attract low quality (primarily private) providers in line with that of the infamous Trump University.

R12.26 We believe the definitions of institutions should be safeguarded. The reason we have eight universities in New Zealand is because the government deemed we have enough. We would expect a definition change would also involve a commitment to following the legislation in the Education Act. We do not expect this would happen. This allowing people to change their definition would cause confusion as to the difference between a former PTE and a University.

However, we support the concept of wānanga being able to call themselves indigenous universities, to accurately reflect their nature. When Te Wānanga o Awanuiarangi is producing PhD graduates we

need to acknowledge they are an indigenous university. Additionally, if universities freely call themselves wānanga, often with little regard to the concept then we would suggest it fair that wānanga can call themselves universities. It is very clear from all promotional material the way in which wānanga are different to a traditional university. We do not believe that this materially impacts on the current restriction on the number of universities in New Zealand.

R12.27 We do not support institutions having the ability to change subsector. Rather we support increased efforts to broaden the understanding of what different qualifications, from different institutions, provide and for those differences to be celebrated.

R12.28 We support maintaining current provisions over potential new entrants. We oppose giving *carte blanche* approval on any grounds since it is students who will suffer if quality standards are not present or maintained. We do not believe that there is any possibility of the entry of Harvard or MIT into New Zealand, more likely poor-quality providers such as Trump University or the University of Phoenix, and the risks far outweigh any potential benefits.

R12.29 NZUSA is frustrated by the narrow either-or approach to student finance. We know it is a false argument to suggest that a student can't have a better standard of living without the reintroduction of interest on their student loan later in life. However, NZUSA supports a higher repayment threshold and a change in the repayment schedule. The current scheme is causing people to be blocked from buying houses, having children and saving for retirement. This is particularly pertinent as this is the generation who is also expected to support baby boomers through retirement (despite this being nowhere on this administration's political agenda). Education is a public good and the government should be expected to make a loss in supporting the next generation of the workforce be adequately prepared, so this generation can in turn meet their societal expectations.

R12.30 We are not convinced what the problem is. The hour-based unit of study is not one for delivery but also for the self-directed contribution by the learner, so if the learner works faster than expected a programme can be delivered faster. In our experience more problems arise from providers under-delivering what is expected than from students seeking truncated courses. We are concerned that this would be abused, and give greater provider-capture.

R12.31 NZUSA supports this recommendation. NZUSA also wishes to the development of student voice systems in the Industry Training sector and so to equalise in this regard also.

R12.32 NZUSA supports this idea. We believe that the removal of the student from the financial transaction creates a disconnect. Currently at some institutions if a student applies for a student loan to pay for fees, they do not receive an invoice and are only able to find financial records under their student management site where grades are also stored.

R12.33 NZUSA understands that rapid change helps nobody. So much of the tertiary lifecycle is dictated by funding. Short timelines create disruption which often results in students bearing the brunt of any poor outcomes. Good timelines and good consultation are essential.

Q12.6 NZUSA does not support the idea of a Student Education Account. We believe that a fixed-limit voucher of any other name still smells like a voucher, even if able to be used in more than location.

Q12.7 We believe that giving more purchasing power to students will further reinforce the consumer mentality and shift away from co-production to education on demand. We believe an interest bearing fund would create perverse outcomes with people potentially holding off on starting their education journey for fear that they will miss out on additional SEA money if they hold out. Paying for careers advice with the SEA would be considered abhorrent to us as it shows the expectation is down to the

individual to get good advice from private bodies not the taxpayer funded Careers NZ. Additionally, the SEA neglects the cost of living. Even with a SEA a student from a university could realistically get another \$30,000 to \$40,000 of student loan in living costs and additional fees. Add to this the discussion about deregulation and a student could be no better off than they are now. Students do not want interest on their student loans and will not support a political administration who enforces it. From our 2016 Income and Expenditure data it is currently the biggest decider in choosing which political party to vote for (followed by free public transport and having a qualification that has a job outcome). The SEA could change depending on the number of students in tertiary study and the interest gained could hugely change what students actually get in the pocket. It's not equitable and it's not fair.

We are much more inclined towards NZ First's tertiary policy which is very equitable. Currently a Bachelor of Social work is a four-year degree. A Bachelor of Engineering is also four years long. It doesn't take a rocket scientist to know that the wage gap between these is considerable with some recent engineering graduates literally earning double that of a social worker. This results in drastically different repayment timelines. Under NZ First's policy framework both of these graduates would be required to work four years before their skills debt is repaid. This model is more just.

Q12.8 NZUSA does not see the SEA causing dramatic innovation. While allowing it to exist over an individual's lifetime does mean there are some institutions that could focus on higher level, multi-mode short courses that would support older people needing to retrain, we think tertiary education being the new compulsory negates this as many would have spent their SEA by the time they got to the age of retraining.

Q12.9 Although international research has clearly demonstrated the enhanced educational outcomes from teaching and learning that is based on understanding students as active participants in their own learning, there are counter-initiatives preventing the benefits from such an approach being fully realised.

One is a continued focus, unfortunately too apparent in the Commission's own thinking, that students can only have power through their role as "consumers" of their tertiary educational experience. We believe that fees are a barrier to education, a violation of the social contract between citizens and their community, and fail to recognise that tertiary study is now as normal as secondary education was recognised as being in the 1940s when it became wide-spread and free simultaneously. Fees, even if students are enabled to pay them through interest-free student loans or vouchers, create a sense that students are purchasing something whereas no teaching can take place without learning and no learning without teaching.

Another counter-initiative is the lack of recognition of the importance of teaching, and especially (although not exclusively) the prioritisation of research in the university sector. While our research with students shows that they completely value the expertise of their tutors, teachers and lecturers (and professional staff), and the research, scholarship, or practical experience that enables that expertise, they also want high quality teaching. We want a system where teaching is valued, where it can be recognised and where there are requirements for professional development, in the same way that there are expectations for continuous improvement for any other learning professional. We do not however believe that tertiary teachers need specific teaching qualifications, and that this would in fact inhibit some of the things that students value from their current teachers. We support the current initiatives Ako Aotearoa have been making towards enhancing and recognising quality, and believe that these need to be nationally mandated rather than embraced only on an ad hoc and voluntary basis institution by institution.

Students as active participants, or even as mere participants getting value for the time and effort that they invest in their tertiary educational experiences, requires outstanding feedback systems so that their teachers are informed as learning needs, student engagement, understanding and whether or not the educational goals are being achieved. We do not currently have systems that realise this.

The main feedback mechanism that institutions have, although some do not utilise even this, is an end-of-course assessment, either digital or paper-based. Paper-based have higher response rates, but take more processing, digital have lower response rates but may also gain feedback from students who do not complete the course or attend the final class. Both however are virtually useless because students do not see the value in them. They are ill-informed as to the value to the teacher or the institution, their own course is now over, and, although the questions may be quite sophisticated students answer them almost invariably in terms of whether or not they “liked” the course.

International best practice involves training at least one person in every class to be reflective about their own learning, connecting where possible that learner with the rest of the class, and having regular feedback opportunities from that enabled learner to inform the day-to-day teaching, the curriculum, the learning design, the support services, the resources available, etc. It also requires the completion of feedback loops, and a well-stated and genuine commitment towards a culture of hearing and heeding the student voice.

We have developed such a system, based on the well-recognised leadership of Scottish initiatives coupled with our own research, and have been implementing it at a small number of polytechnics this year and have agreement to expand into university environments from 2017. We are also exploring the possibilities that exist in workplace training. A student-centred system would have such world-leading practices as standard.

We acknowledge that we are long way from having a student centred tertiary education system and that a considerable amount of this gap is with respect to students and their organisations’ ability to engage in the way that they need to, alongside the approach of the institutions.

We point, again to Scotland, for an approach when they found themselves in a similar situation in 2004 when they adopted the national position encapsulated in “The Scottish Framework for Student Engagement”. They realised that there needed to be investment in capacity building and since then the Scottish Funding Council has funded Student Partnership (nee Participation) in Quality Scotland or “sparqs”.

Sparqs ensures that every student representative in Scotland is trained according to the same system, and therefore has the same role, throughout the entire state tertiary education system: University and College. They also work to support national student representatives who are contributing to discussions about quality and quality enhancement are supported with up-to-date research, and work with different institutions and national agencies on enhancement themes

We envisage exactly the same approach here: a national centre to advance student voice and student engagement through training, support, research and working directly with both institutions and national agencies. Since Ako Aotearoa and NZUSA have been leading this work so far we would see that those two organisations would be central to the project, overseen by a steering group that represents the sector. It would draw upon the research and activities that have currently taken place but would have a clear national mandate and the resources to implement its programme.

New Zealand has a similar population to Scotland, although a smaller proportion engaged in further and higher education – although we would see industry-based training as also within the ambit of this

project. The sparqs budget is around £350,000 per year. We would envisage a slightly smaller amount, around \$NZ550,000, would achieve similar outcomes here. We would see it as a project of Ako Aotearoa that they work with NZUSA to deliver, and that the initial establishment would involve engaging sparqs in a consulting role.

The system needs to engage with learners throughout their learner pathways. One of the issues that the New Zealand system faces is of a perceived disconnect between tertiary education and the skills and attributes that are expected on entry into employment, as well as the secondary-tertiary disconnect identified above.

To a large extent with is because the sectors do not talk to one another, institutions believe that their job finishes when the students graduate, employers believe that the graduates should be perfectly formed when they arrive at the workplace, but do not have a mechanism for informing institutions regarding perceived deficiencies. The role of the employer in providing work-place specific training and professional development is also not clearly understood.

We have been working on an initiative whereby the student representatives trained in accordance with our programme of creating reflective learners is carried through into the workplace, where, for a period post-graduation the graduate continues to feedback to their institution on their experience in the workplace. This can inform (to consolidate or affect changes) in curriculum content and other aspects of their programme.

Part of the training involves better engagement with graduate attributes of specific programmes which we believe has an added benefit with respect to better understanding of the differences between applied and research-based qualifications. We believe that this approach is of benefit to students, employers and graduates and further that it could be a specific outcome of the national centre for student voice discussed in the previous section.

Sparqs has recently initiated a project that engages with secondary school students which may be a future aspect of enhancing student voice in New Zealand too, through better understanding and managing that transition.

Appendix A:

A Student Centred Tertiary Education System

A student centred tertiary education system will be nationally considered and organised towards this goal, where students are well-supported and prepared, where student mobility is enabled and which has ease of matriculation, articulation, and credit transfer. It will be one where students are seen as active participants in their own learning, as co-creators of education, where there are outstanding feedback systems, and where resources are dedicated to enhancing the capability of students to be these active participants on a national basis. It will engage with students at all stages of their educational pathways, recognising that students will enter different levels, and will increasingly need to return to formal and informal study throughout their lives.

National Considered and Organised

A significant issue for the New Zealand system is the lack of coordination and oversight, and this is no more so than in the area of student engagement, although there are other issues too. We need to have a national conversation about how many institutions we have, where they are located, what they offer and how they relate to each other. A case in point is the current merger frenzy amongst regional polytechnics. There is no sense as to what the desired outcome of this endeavour is, and it seems piecemeal at best. There are only poor arrangements between institutions that make up the different sub-sectors, and the 130,000 students engaged in work-place based training are disconnected, at best, from formal institution-based learning.

When Scotland desired to review its College (so the equivalent of our polytechnic) sector, it came up with a national plan, organised Colleges into 25 regions, and required each to have articulation agreements with universities (and for the universities to have articulation agreements with the Colleges). Identifying that student voice was far less developed in the College sector than the University sector (as it is in New Zealand) the Scottish Funding Council resolved to invest in a multi-year project to enhance student voice in Colleges.

The latter was a natural outcome of another national initiative, to put students, and their voice, at the centre of the system. This was done through the National Framework for Student Engagement, which sets out national goals, and, recognising that this would need additional capacity (see below) the Scottish Funding Council also resolved to fund a national centre to build capability and capacity within institutions and students' organisations to enhance student voice through Student Partnership in Quality Scotland. This initiative is one that we highly recommend for New Zealand too. Again, there is more on this below.

Students are Well-Supported and Prepared

Our research into the preparation and support that students get before they embark on their tertiary studies shows that this is patchy, and differs wildly from institution to institution, and highly dependent on where they are coming from. Research undertaken in conjunction with Ako Aotearoa, the national centre for excellence in teaching and learning, shows that there is a significant disconnect between what secondary school teachers and university lecturers understand the others' expectations are, although there are also pockets of excellence.

Our research also shows that the advice that tertiary students receive in making the secondary-tertiary transition is also patchy, and mostly poor. We strongly support recent initiatives that will professionalise careers' advice in the compulsory sector although have little sense that Careers New Zealand has the capacity or processes in place to lead this work. There are some eight different government initiatives in this area, poorly co-ordinated and some quite wrong-headed in terms of alignment with what students are themselves considering in making their post-compulsory choices. In addition, the focus of more than 90% of the spend on careers' advice in secondary schools means that there are large gaps in provision of advice for learners who are attempting to enter tertiary education or training from other directions.

What students have told us, in our extensive discussions, is what they would most like would be to engage with students who have previously undertaken particular study, and that they wish to be freed from a provider-dominated system which is based around advertising not information. We believe that this could be an outcome of the national centre for student voice, and address this below.

Student Mobility is Enabled

The current system traps students geographically and within the institutions and programmes that they initially embark upon, even though the likelihood that they will end up completing that initial choice is less than 50% (refer poor advice above). This despite that, in the university systems at least, the quality of provision for initial degree-level study is uniformly of high quality.

There are three significant barriers to enhancing student mobility.

1. At exactly the level where it does matter where higher-level qualifications are pursued, ie post-graduate study where for logical resource reasons capacity is limited due to specialisation, students lose financial support. This is particularly significant for those students who receive student allowances during their undergraduate study, or who may wish to return to high levels of study after some time in the workforce. These students will experience large reductions in income. This is proving to reverse gains that had been made in the allied health field where a lot of work had been going into making the health workforce look more like the New Zealand population and where post-graduate qualifications are considered entry level.
2. Provision is inconsistent at the sub-degree level and students, particularly in provincial areas, have limited choices without undertaking either long commutes or shifting away from the financial and pastoral support that is available at their familial homes. We recommend that the polytechnic sector be re-organised to ensure a minimum level of provision in all geographical centres, with agreements in place so that the study so undertaken can be extended, should the students desire such, only when there is certainty around objectives and the student's investment (financial and time) is well understood. This will mean that programmes will need to be available where the current requirement for economies of scale would not permit on financial grounds.
3. Recognition for study at other institutions and even within other programmes within an institution is *ad hoc*, expensive and is not encouraged under a system where institutions are rewarded for holding onto unhappy students, and have *carte blanche* to impose their own recognition of prior learning rules. We note that the proposal that institutions should have greater flexibility in developing and naming their own programmes would make this worse, and is in the opposite direction of the TROC, an initiative which we believe is important to enable student mobility.

Ease of Matriculation, Articulation and Credit Transfer

We believe that there need to be nationally determined entry levels for programmes, and a flexible system of provision that students who meet such standards can attend the programme and institution of their choice. This will give students certainty, and the development of the entry level standards encourage national conversations around the level of preparation that is required, including between tertiary and compulsory sector providers.

While we recognise that “University Entrance” is problematic in terms of focusing attention on university as a destination for many students for whom that is not necessarily the best option, we believe that we need to address that through professionalising careers’ advice and an increased understanding of graduate outcomes. We are also concerned that making it instead “Degree-level Entry” would erode some considerable advances in creating pathways and other alternative entry criteria at polytechnics for students who can achieve degree-level study but have not been well-served by the compulsory sector.

We believe that one of the purposes of (particularly regional) polytechnics is to prepare students for success at degree-level study, and where the students learning style is better suited for that study to be in a university that this should be enabled. All tertiary institutions should have clear articulation agreements with one another on a reasonable regional basis, and these should inform curriculum such that students are able to progress through a three or four year programme seamlessly and within the timeframe that they initially understood. Too many students currently find that courses they have successfully passed are not able to be used for credit at another institution, and where they shift between institutions the equivalent programme, or the logical extension of the programme they have completed, involves them expending more time and money than it should have.

The current system also restricts options for university students. One example is the AUT Sport and Recreation programme that is provided at NorthTec. This is a three-year degree taught by NorthTec staff, each year at NorthTec is transferable into the equivalent at AUT should a student wish to transfer, but at NorthTec only the student can exit after one year with a Certificate, after two years with a Diploma and after three years with the Degree. The current TEC rules that limit universities teaching below degree level programmes limit AUT students choices. If they choose to move from first or second year into employment, then they leave with no qualification.

We have already provided the Commission with information regarding the specific issues that have emerged within a programme where students completing the first year of degree level study cannot be transferred to the first year of diploma study within the same programme. We do not believe that this is isolated. In that case no course is transferable, instead students are required to make applications on a course-by-course basis for recognition of prior learning, and no more than 25% of what they have already studied is transferable. We believe that credit transfer requires a major overhaul, and that any fees charged need also to be nationally regulated so that institutions are no longer encouraged to use their processes to impose barriers to students’ logical educational choices.

Students As Active Participants

Although international research has clearly the enhanced educational outcomes from teaching and learning that is based on understanding students as active participants in their own learning, and students under the national curriculum in New Zealand primary schools are already being seeded with

exactly this approach, there are counter-initiatives preventing the benefits from such an approach being fully realised.

One is a continued focus, unfortunately too apparent in the Commission's own thinking, that students can only have power through their role as "consumers" of their tertiary educational experience. We believe that fees are a barrier to education, a violation of the social contract between citizens and their community, and fail to recognise that tertiary study is now as normal as secondary education was recognised as being in the 1940s when it became wide-spread and free simultaneously. Fees, even if students are enabled to pay them through interest-free student loans or vouchers, create a sense that students are purchasing something whereas no teaching can take place without learning and no learning without teaching.

Another counter-initiative is the lack of recognition of the importance of teaching, and especially (although not exclusively) the prioritisation of research in the university sector. While our research with students shows that they completely value the expertise of their tutors, teachers and lecturers (and professional staff), and the research, scholarship, or practical experience that enables that expertise, they also want high quality teaching. We want a system where teaching is valued, where it can be recognised and where there are requirements for professional development, in the same way that there are expectations for continuous improvement for any other learning professional. We do not however believe that tertiary teachers need specific teaching qualifications, and that this would in fact inhibit some of the things that students value from their current teachers. We support the current initiatives Ako Aotearoa have been making towards enhancing and recognising quality, and believe that these need to be nationally mandated rather than embraced only on an *ad hoc* and voluntary basis institution by institution.

Outstanding Feedback Systems

Students as active participants, or even as mere participants getting value for the time and effort that they invest in their tertiary educational experiences, requires outstanding feedback systems so that their teachers are informed as learning needs, student engagement, understanding and whether or not the educational goals are being achieved. We do not currently have systems that realise this.

The main feedback mechanism that institutions have, and some do not utilise this, is an end-of-course assessment, either digital or paper-based. Paper-based have higher response rates, but take more processing, digital have lower response rates but may also gain feedback from students who do not complete the course or attend the final class. Both however are virtually useless because students do not see the value in them. They are ill-informed as to the value to the teacher or the institution, their own course is now over, and, although the questions may be quite sophisticated students answer them almost invariably in terms of whether or not they "liked" the course.

International best practice involves training at least one person in every class to be reflective about their own learning, connecting where possible that learner with the rest of the class, and having regular feedback opportunities from that enabled learner to inform the day-to-day teaching, the curriculum, the learning design, the support services, the resources available, etc. It also requires the completion of feedback loops, and a well-stated and genuine commitment towards a culture of hearing and heeding the student voice.

We have developed such a system, based on the well-recognised leadership of Scottish initiatives coupled with our own research, and have been implementing it at a small number of polytechnics this year and have agreement to expand into university environments from 2017. We are also exploring

the possibilities that exist in workplace training. A student-centred system would have such world-leading practices as standard.

Enhancing the Capability

We acknowledge that we are long way from having a student centred tertiary education system and that a considerable amount of this gap is with respect to students and their organisations' ability to engage in the way that they need to, alongside the approach of the institutions.

We point, again to Scotland, for an approach when they found themselves in a similar situation in 2004 when they adopted the national position encapsulated in "The Scottish Framework for Student Engagement". They realised that there needed to be investment in capacity building and since then the Scottish Funding Council has funded Student Partnership (nee Participation) in Quality Scotland or "sparqs".

Sparqs ensures that every student representative in Scotland is trained according to the same system, and therefore has the same role, throughout the entire state tertiary education system: University and College. They also work to support national student representatives who are contributing to discussions about quality and quality enhancement are supported with up-to-date research, and work with different institutions and national agencies on enhancement themes

We envisage exactly the same approach here: a national centre to advance student voice and student engagement through training, support, research and working directly with both institutions and national agencies. Since Ako Aotearoa and NZUSA have been leading this work so far we would see that those two organisations would be central to the project, overseen by a steering group that represents the sector. It would draw upon the research and activities that have currently taken place but would have a clear national mandate and the resources to implement its programme.

New Zealand has a similar population to Scotland, although a smaller proportion engaged in further and higher education – although we would see industry-based training as also within the ambit of this project. The sparqs budget is around £350,000 per year. We would envisage a slightly smaller amount, around \$550,000, would achieve similar outcomes here. We would see it as a project of Ako Aotearoa that they work with NZUSA to deliver, and that the initial establishment would involve engaging sparqs in a consulting role.

Engage With Learners Throughout Their Learner Pathways

One of the issues that the New Zealand system faces is of a perceived disconnect between tertiary education and the skills and attributes that are expected on entry into employment, as well as the secondary-tertiary disconnect identified above.

To a large extent this is because the sectors do not talk to one another, institutions believe that their job finishes when the students graduate, employers believe that the graduates should be perfectly formed when they arrive at the workplace, but do not have a mechanism for informing institutions regarding perceived deficiencies. The role of the employer in providing work-place specific training and professional development is also not clearly understood.

We have been working on an initiative whereby the student representatives trained in accordance with our programme of creating reflective learners is carried through into the workplace, where, for a period post-graduation the graduate continues to feedback to their institution on their experience in

the workplace. This can inform (to consolidate or affect changes) in curriculum content and other aspects of their programme.

Part of the training involves better engagement with graduate attributes of specific programmes which we believe has an added benefit with respect to better understanding of the differences between applied and research-based qualifications. We believe that this approach is of benefit to students, employers and graduates and further that it could be a specific outcome of the national centre for student voice discussed in the previous section.

Sparqs has recently initiated a project that engages with secondary school students which may be a future aspect of enhancing student voice in New Zealand too, through better understanding and managing that transition. They are doing other work with learners involved in workplace training. Both of these initiatives would have applicability here.