ASSOCIATION OF EMERGENCY CARE TRAINING PROVIDERS INC
Promoting quality in emergency care training

26 September 2025

New Zealand Qualifications Authority (NZQA)

Email: QAFredesign@nzqa.govt.nz

Submission: Finalising the design of the integrated quality assurance framework

This submission is made on behalf of the membership of the Association of Emergency Care Training Providers (AECTP). It is made in good faith in my role as Chair of the AECTP.

We have also completed the online questionnaire. This document includes our responses to your questions as well as some background information on our association and an executive summary of our submission comments.

Please contact the AECTP NZ Executive Officer at the email address provided below for any further information regarding this submission.

Simon Barnett
Chair

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# Submission: Finalising the design of the integrated quality assurance framework

The Association of Emergency Care Training Providers (AECTP)

The Association of Emergency Care Training Providers, also known as AECTP, was formed in 2011 from a desire to drive quality first aid training across New Zealand. Currently the AECTP has over 20 members, including Private Training Establishments (PTEs), Institutes of Technology and Polytechnics, and schools. The PTEs represented by the AECTP (in this submission referred to as *First Aid PTEs* or *TEOs*) comprise approximately 80% of NZQA accredited first aid training providers. First Aid PTEs provide first aid training to a wide range of industries, education organisations, and communities. Some First Aid PTEs operate on a national scale, while others operate regionally.

The AECTP Board consists of eight member representatives, comprising two appointed by New Zealand Red Cross, two appointed by Hato Hone St John, and four elected from the independent member organisations by the AECTP membership.

Since 2014 the AECTP has been recognised by NZQA as a "Peak Body" representing the first aid training industry. We work collaboratively within our membership and with external stakeholders, including NZQA, Toitū te Waiora, Tertiary Education Commission and WorkSafe to strengthen quality of and confidence in the emergency care training sector and improve first aid treatment and survival outcomes across Aotearoa New Zealand.

Our members predominantly assess against unit standards 6402, 6401, and 6400. Our sector awards approximately 250,000 unit standards per year (see graph below, data kindly provided by Toitū te Waiora).
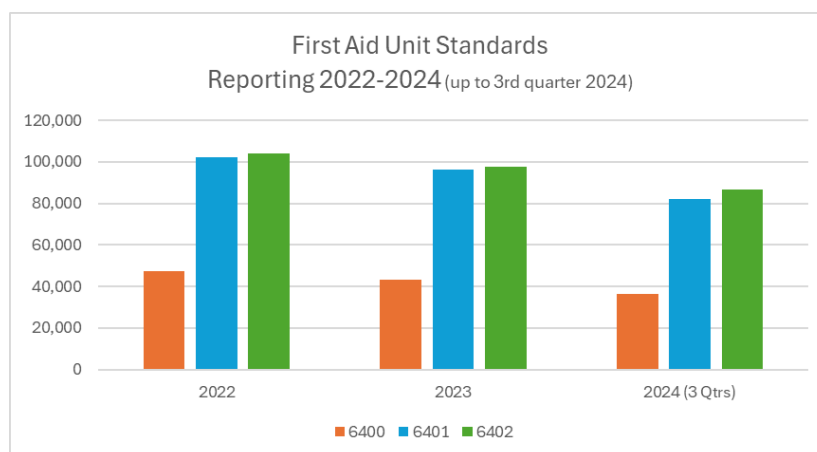
Submission

Introduction

Our understanding of this review

The AECTP understands that NZQA is reviewing the quality assurance of tertiary education organisations to ensure the quality assurance arrangements function as intended.

NZQA have created a draft integrated quality assurance framework (iQAF) and, following an initial consultation in 2024, are now seeking feedback to inform the process of finalising the design of the integrated quality assurance framework.

It is our understanding that the current plan is to implement the iQAF from 1 January 2026, as NZQA has decided to phase out the External Evaluation and Review (EER) process and consistency reviews from that date.

NZQA quality assurance of AECTP members

AECTP members operate as Private Training Establishments and have undergone quality assurance by NZQA for decades, including external evaluation and review (EER) since these were established in 2009. The proposed discontinuation of EER and the move to a "real time view of integrated monitoring reflecting the TEO's risk profile" is a key change for our members and a core focus of our submission.

Previous submission

The AECTP has submitted feedback on the iQAF 2024 consultation. All comments made in our previous submission are still valid, even if not repeated in this document. This applies particularly to our request for clear criteria (compliance and risk assessment) and ensuring proportionality of quality assurance processes for providers delivering only short courses, such as first aid TEOs.

Executive summary

The AECTP supports most aspects of the proposed iQAF and considers that, overall, it will be a more efficient and effective approach for assuring quality of TEO, including first aid TEO. However, we remain concerned about a lack of criteria for critical processes, including compliance assessment / monitoring, risk assessment, and changing the frequency of financial submission as well as the revised tertiary education indicators. Furthermore, the role of the self-review report and conversation in TEO performance and compliance evaluation by NZQA requires clarification, and we have not yet been assured that NZQA will ensure proportionality of quality assurance processes for providers delivering only short courses, such as first aid TEOs. Finally, in order to maximise the value and achieve the intended outcomes of the self-review process, it will be important for TEOs to have a consistent NZQA contact (either an individual or a team of NZQA staff with sector knowledge) for the associated conversations.

We will seek to engage with NZQA to seek further clarification of the implications of the proposal to our sector. We will offer to co-develop indicators and criteria relevant to our sector and provide feedback on the relevance and implementation of processes yet to be developed or refined. We urge NZQA to accept our offer to achieve a successful and efficient quality assurance framework for our sector.

Responses to your questions

Part One – iQAF levers and activities

Strong quality assurance foundations

Question 1: Do you agree with the proposals to simplify approval and accreditation processes? If not, what would you change?

Answer:

- We support simplification where quals/micro-creds are built from skill standards as this avoids duplicate scrutiny.

- We request that evidence requirements are proportional to the qualification, particularly for short courses. Requirements should focus on key aspects and avoid degree-style documentation for short courses, including 1–3 day programmes.

- We suggest NZQA publish service levels/timeframes for approvals and provide for fast-track approval processes for proven TEOs with strong compliance histories.

- To support the intentions set out in the consultation document we consider it critical that NZQA ensures evaluator/approver have sector knowledge. For approvals and accreditation processes in the first aid training sector, this would require familiarity with the first aid and short course context).

TEO ownership of quality and quality improvement

Question 2: Do you agree with the proposed self-review process? If not, what would you change?

Answer:

- We support the self-review process in principle; however, urge that both process and documentation (including any NZQA templates) must be clear and efficient for short-course providers.

- It would be valuable for TEOs, and we believe also for NZQA, if TEOs had a consistent NZQA contact for the self-review conversations. In addition to ensuring that the NZQA contact has or develops a sound understanding of the first aid TEO education and compliance context, this would allow a relationship and understanding to be developed between NZQA and the TEO that, we believe, is essential for the new quality assurance process to fulfil its intentions. Furthermore, there would be direct efficiencies if the NZQA staff member would enter the conversation with direct knowledge of the TEO, rather than just the notes from previous conversations and other records. As a minimum, we recommend that NZQA appoints teams to work with specific sectors. A team approach would have added benefits of building in some redundancy for the event of leave or staff turnover.

- We understand that the Code self-review will be combined with the iQAF self-review and support this. We would strongly oppose duplicate reporting.

- We suggest formal clarification that identifying improvements does not equal increased risk. NZQA should view improvements positively and state that in a transparent manner.

- It is unclear what the purpose of the "succinct summary" is that NZQA will prepare after the conversation. We request that this document will only be finalised once it has been agreed by both the TEO and NZQA that it is an accurate and fair reflection of the conversation. To achieve this, the TEO should have an opportunity to edit a draft version prepared by NZQA. We suggest that submission dates for the various submissions required by TEOs are staggered. It would be helpful if TEOs had the opportunity to align submissions with their financial year.

- We request clarification of the role of the self-review process in the context of TEO compliance. It is currently unclear to what extent the <u>content</u> of the self-review report and conversation will be used to inform NZQA's assessment of TEP performance and compliance, as opposed to simply the fact that the self-review report was submitted and the conversation took place.

- We have one specific suggestion for the self-review summary report template. We suggest rewording the section on key initiatives to "List the key initiatives your organisation undertook in the previous year to **maintain and/or** improve: ..." (addition shown in bold font). This better recognises that some TEOs may be performing well and may not need additional initiatives to achieve good outcomes. This would particularly apply to short courses with limited flexibility in course design and delivery, such as first aid.

Effective verification of TEO quality

Question 3: Do you agree with the proposed approach to monitoring degrees, graduate certificates and diplomas, and postgraduate qualifications? If not, what would you change?

Answer:

- Our sector does not deliver degree-level programmes.

- We note positively that NZQA recognises proportionality by reducing the burden for higher-level qualifications.

- However, we are concerned that while degree monitoring is decreasing, sub-degree/short-course monitoring appears to be increasing. This creates inconsistency in how proportionality is applied.

Question 4. Do you agree with the proposed approach to monitoring programmes leading to sub-degree qualifications at Levels 1-7? If not, what would you change?

Answer:

- As a short-course sector, we support the principle of risk-based monitoring provided risk indicators are transparent and predictable.

- We are concerned that compared to degree-level providers, sub-degree/short-course TEOs may actually face more frequent and resource-intensive monitoring.

- We recommend NZQA apply proportionality consistently across levels — if monitoring is reduced for degrees, short-course providers should not be monitored more intensively without clear justification.

Question 5. Do you agree with the proposed approach to monitoring micro-credentials? If not, what would you change?

Answer:

- We welcome NZQA's plan to publish fewer, clearer quality indicators.

- The indicators must be fit-for-purpose for first aid (e.g., short-courses, rapid delivery cycles; focus on workplace relevance rather than educational pathways). As it will be likely that some indicators will not be relevant to our sector, there should be clear direction that they do not apply.

- We would appreciate NZQA engaging with us to inform indicator development and/or conversations to ensure clarity on applicability to TEO in our sector.

- We ask that SSB/ISB moderation evidence is used as primary evidence for monitoring where standards are used.

Question 6. Do you think the combination of compliance monitoring and education performance monitoring will provide sufficient assurance of an organisation's overall capability to deliver high-quality education? If not, what would you change?

Answer:

- Yes, providing the risk assessment process and indicators used to determine risk are clear, published, consistently implemented and providing duplication is avoided, and cycles are predictable.

- We request that advance notice (e.g., 12 months) is provided for planned monitoring, with clear rationale if brought forward.

- We request that existing assurance like pre and post assessment moderations by NZQA or other relevant organisations is acknowledged, i.e., that NZQA adopts a "recognise existing assurance first" principle (use SSB audits).

- TEOs should have real-time access to their risk rating and the basis on which risk has been assessed, e.g., evidence used to determine risk, assessments made, risk indicators applied.

Part Two – Proposed rules changes

Rule changes to support iQAF

Question 7: Do you have any comments or suggestions for the proposed changes to review periods for qualifications, micro-credentials and standards?

Answer:

- We support moving away from fixed 5-year cycles to flexible, usage-informed reviews.

- We suggest NZQA publish criteria for expiring low-use products and ensure meaningful sector input before expiry.

- We request that ISB review schedules reflect first aid demand cycles and are responsive to legislative, i.e., WorkSafe, changes.

Programme Approval, Recognition, and Accreditation Rules

Question 8: Do you have any comments or suggestions for the proposed Rules changes to support streamlining approval processes?

Answer:

- We support a process where a single application covers the programme and consent to assess where skill standards used.

- We suggest NZQA create a "trusted provider" lane for established first aid TEOs and reduced the evidential burden for applications in the same or related domains.

- We suggest NZQA provide model documents/templates for short courses to facilitate and speed up consistent approvals.

Programme Approval, Recognition, and Accreditation Rules and the Micro-credential Approval and Accreditation Rules 2025

Question 9: Do you have any comments or suggestions for the proposed Rule changes to specify the nature and frequency of monitoring activities?

Answer:

- We suggest NZQA define a baseline frequency for monitoring micro-credentials (e.g., not more often than 3-yearly) unless risk triggers a more frequent review. Baseline frequencies may vary among sectors. We would appreciate an opportunity to engage with NZQA to determine an appropriate monitoring frequency for first aid micro-credentials.

- We request that NZQA publish risk triggers (e.g., complaints spikes, moderation failures) so TEOs can self-manage risk.

- SSB/ISB moderation outcomes should be recognised as an important part of monitoring to reduce NZQA monitoring of TEOs where standards are used and moderation requirements are met.

Quality Assurance Rules

Question 10: Do you have any comments or suggestions in relation to the purpose or scope of the Quality Assurance Rules?

Answer:

- We support replacing EER with self-review and conversation, but rules must state that:

  o Self-review is not punitive; improvements won't automatically escalate monitoring.

  o NZQA will publish templates and "what good looks like" examples for short courses.

        ○   NZQA will provide clear guidance about expectations, e.g., for "evidence of the effectiveness of the TEOs self-review processes" or accept the TEOs chosen approach. If no clear guidance is provided, NZQA will not be permitted to challenge a TEOs approach or use disagreement with the approach chosen by the TEO in any punitive manner, including as an indication of inadequate performance or non-compliance.

- As mentioned previously, the role of self-review in NZQA's determination of TEO performance or compliance requires clarification.

- We request that NZQA publishes annual themes early so TEOs can prepare.

- We request that NZQA carefully considers the implementation timeframes and implications for TEOs. NZQA proposes to introduce new or amended Rules to support iQAF implementation in January 2026. Between January and June NZQA is proposing to consult with TEOs and offer guidance and workshops for TEO review. This is followed by a start of TEO review report submissions and conversations in June 2026. This timeline may not provide sufficient time for TEOs to amend their processes and collect data to inform the new requirements and to meaningfully prepare review reports and hold conversations.

Private Training Establishment Registration Rules

Question 11: Do you have any comments or suggestions in relation to consequential changes to the Private Training Establishment Registration Rules?

Answer:

- We support biennial financial returns default; however, request clear, published criteria for requiring annual reviews to surprises and inconsistent implementation.

- We request that apparent data gaps arising for first aid TEOs that, due to their status do not have to submit learner data, aren't misclassified as higher risk.

Other proposed Rules changes

Question 12: Do you have any suggestions for matters NZQA needs to consider in Rules for ISBs?

Answer:

- We suggest NZQA set service standards for endorsement/moderation turnaround.

- We request requiring ISBs to publish moderation expectations and annual plans and align with NZQA monitoring to avoid duplication.

- We suggest mandating regular engagement with peak bodies (including AECTP) when developing or reviewing standards/indicators.

Question 13: Do you have any suggestions for matters NZQA needs to consider in Rules for work-based training?

Answer:

- While AECTP members provide first aid training to learners who may also be engaged in work-based training programmes, we do not deliver work-based training ourselves, so this area is not directly relevant to our sector.

Question 14: Do you agree with the proposal to increase the student fees exemption to $1000 (GST inc)? If not, please provide your reasons.

Answer:

- We agree. This would alleviate the disproportionate administration to run trust arrangements for low-value, short-lead first aid bookings.

- We recommend futureproofing to $1,500 at some point in the future or adding an indexation mechanism (e.g., CPI review every 3 years).

- We note that the savings achieved would let providers redirect effort to learning quality (resources, instructor PD, assessment improvements).