Submission on *Review of the Committee on University Academic Programmes (CUAP)*

Introduction

1. Thank you for the opportunity to comment on the current review of the Committee on University Academic Programmes (CUAP; the Committee).

2. As the National Centre for Tertiary Teaching Excellence, Ako Aotearoa's mandate is to support the best possible outcomes for all learners in tertiary education. We do this through supporting change projects that lead to sustainable benefits for learners, providing professional development, and leading discussion in the sector on key strategic issues. Our focus lies across the entire tertiary system, from postgraduate research degrees to fundamental skills and 'second-chance' learning, and involves all aspects of tertiary education that support good learner outcomes.

3. Ako Aotearoa does not develop degree qualifications (although we are the 'developer' for sub-degree teacher education qualifications) or programmes and does not directly interact with CUAP; we therefore cannot comment on the practical experience of engaging with CUAP processes. We do, however, have a strong interest in the quality of tertiary teaching and learning in New Zealand – including programme design – and consequent impacts on learner outcomes. Our approach to this submission therefore relates primarily to the Committee's position as a part of our national quality assurance infrastructure. In preparing this submission we have focused on CUAP's programme approval function,[1] rather than associated roles such as representing the university sector in relevant forums, participation in the Joint Consultative Group, credit transfer, or management of University Entrance.

4. We note that this review is taking place concurrently with the culmination of the Productivity Commission's inquiry into tertiary education, which discussed CUAP and has made draft recommendations regarding its current and future operation (including associated areas such as University Entrance). For the purposes of this submission we have assumed that any draft recommendations that are also included in the Commission's final report would not take effect in the immediate future.

5. We do, however, believe that the Commission's work represents important context for the review panel, as well as being a valuable resource for views on CUAP and its processes.[2] We therefore recommend that the review panel be supplied with relevant excerpts from the Commission's discussion paper, draft report, and (when available) final report; as the

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[1] 'Programme approval' in this context being a generic term relating to the Committee's functions as set down in sections 6.1 and 6.2 of the CUAP Handbook (Universities New Zealand, 2015).
[2] It should be stressed that this does not represent Ako Aotearoa's endorsement of the Commission's findings or draft recommendations. For our views in this regard, see our submissions to the inquiry available at https://akoaotearoa.ac.nz/ako-aotearoa-submissions

Commission has made submissions on its reports publicly available it may also be useful for these to be independently analysed for references to CUAP and the results presented to the review panel. We also recommend that the mid-March site visit include a meeting with the Productivity Commission and/or inquiry team members if possible.

CUAP Processes

6. We believe that CUAP provides a robust and broadly effective system of quality assurance for university-based programmes that allows stakeholders – most importantly learners – to have confidence in the appropriateness, relevance, and standard of such education.

7. As noted earlier, we cannot speak to the overall operational efficiency of this system.   We have heard anecdotal concerns from practitioners regarding the time taken to approve new programmes, but we are also conscious of the point – notably articulated by the University of Otago in its submission to the Productivity Commission (University of Otago, 2016) – that much of the time involved in programme approval stems from internal processes managed by universities. To facilitate more rapid turnaround, however, we do believe that it would be useful for CUAP to consider programme approvals more than twice a year.

8. We do believe it would be valuable for CUAP to consider the conception of quality standards that underlies its programme approval process. Specifically, 'quality' can be defined in multiple different ways, and these in turn affect the systems used to ensure quality and the characteristics they prioritise. For example, Harvey and Green (1993) identify four conceptions of what constitutes higher education quality: exceptional practice, 'perfection' or consistency, value for money, or the transformation of participants (i.e. learners). Harvey (2002) goes on to argue that external regulators often neglect transformative definitions of quality and consequently develop systems that focus on compliance with processes and minimum requirements rather than evaluating effects for learners. Being more explicit about what CUAP sees as constituting quality may both be of practical assistance to those developing proposals, and provide a valuable contribution to discussions of quality teaching and learning in New Zealand.

9. The Committee's approach to programme approval relies heavily on the operation of robust programme approval processes at individual universities. This has occasionally raised the question of whether an external body is needed or whether universities should be self-accrediting. We currently oppose moves to self-accreditation and believe it is important that universities – and all TEOs – remain subject to oversight from an external quality body.

10. External oversight allows learners, communities, industries, and the government greater faith in the consistency and quality of qualifications across the system; this is particularly important given the incentives involved in a highly competitive, student-based funding environment such as New Zealand's. The Committee's processes and requirements also provide a standardised 'language', approach, and set of expectations for working with quality across universities. While university staff and management may appreciate not being subject to external quality assurance oversight, this would not serve the interests of current and future learners (or other stakeholders). Moreover, we would disagree that there is any rationale for universities to be privileged in this regard compared to other

sectors; any moves to self-accreditation for universities should only occur within a wider examination of self-accreditation for New Zealand TEOs.

INQAAHE Alignment Review

11. In our view, CUAP largely operates in alignment with INQAAHE's guidelines of good practice (INQAAHE, 2016). We do, however, have some concerns regarding composition (guideline 1.3.2), and external appeal (guidelines 3.2.1 to 3.2.3).

12. Regarding composition, guideline 1.3.2 states that "The composition of the decision-making body and/or its regulatory framework ensure its independence and impartiality". In our view CUAP's current composition does not appear to be in keeping with this guideline.[3] We strongly support the inclusion of a student member on the Committee; this is an important way of ensuring that the learner voice is included in quality assurance processes and we congratulate CUAP on its commitment in this regard. The remainder of the Committee's membership, however, consists solely of senior staff from each university and appears to be based primarily on ensuring that all universities agree to a given programme being approved (notably by requiring that all universities are represented on the Committee).

13. Independence and impartiality in a regulatory authority would normally be ensured by including external members – potentially including laypeople with relevant experience and expertise. The Committee's current composition appears to instead be based on an implicit assumption that only university staff are qualified and entitled to make decisions on the suitability of programmes offered by universities, and that this principle should be privileged over others.[4] We disagree strongly with this view, which is against the spirit of modern approaches to quality assurance in education (and New Zealand's qualifications framework), and fails to recognise that relevant expertise can lie across sectors.[5] Moreover, such an argument could also be made by wānanga, ITOs, and other parts of the education sector, whose programmes have distinctive characteristics but which are subject to approval by those outside their sector. It is unclear why universities should be privileged in this regard.

14. In our view, strong consideration should be given to including non-university members on the Committee, with membership being based on the possession of appropriate expertise in quality assurance and/or programme design (either broadly or in specific education sectors). This could potentially include an NZQA staff member, in order to promote further alignment between approval standards for degrees irrespective of the sector in which they are offered. This could be balanced by changing the current situation whereby all universities must be included on the Committee. We see the inclusion of university representation as important

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[3] We would like to emphasise that we have confidence CUAP currently *operates* in an independent and impartial manner. Our views here relate to whether its membership structure represents international good practice as reflected in the INQAAHE guidelines.

[4] Notably, not only does CUAP require those appointed to be university staff, but requires members to resign if they subsequently cease employment with a university (Universities New Zealand, 2015, s.7). This suggests that CUAP privileges the sector in which a member is employed over their ability to contribute to the quality of qualifications. For example, a CUAP member with globally recognised in programme design and quality assurance would have to resign if they began working purely as a consultant or moved to an ITP.

[5] For example, the ITO, ITP, and PTE sectors generally have significantly more expertise than universities in offering effective workplace-based or workplace-integrated programmes.

for the operation of CUAP but consideration could, for example, be given to a rotating membership with representatives of four universities being included on the Committee at any one time.

15. Regarding appeals (guidelines 3.2.1 to 3.2.3), we understand that CUAP does not maintain a formal appeal process.[6] We also understand that it is rare for CUAP to decline a programme that reaches it, and that it is significantly more common for a programme to either receive deferred or conditional approval, or for the relevant university to choose to withdraw its application. The combination of the initial Online Resolution Process with the ability to resubmit a programme may be seen as essentially equivalent to an appeal system, but we believe that in keeping with good practice consideration should be given to developing a formal process for appealing CUAP decisions (though we also accept that this process may be rarely used).

Audit Compliance

16. While we have not directly explored what changes were or were not made as a result of the 2011 audit report (though we note the retention of section 1.c in CUAP's Terms of Reference, against recommendation 3 in the Review) , we believe that CUAP's current processes do appear to largely reflect the recommendations in that report. We do note, however, that recommendation 9 of the review regarding ensuring that programmes are assessed in terms of Treaty of Waitangi principles, simply refers to amending the programme template – in other words simply establishing a small compliance requirement. We recommend that the review panel specifically consider whether this has been effective in ensuring universities comply with the relevant criterion in the Criteria for Approval and Accreditation of Courses. This could include exploring the extent to which CUAP has in practice made comments on this section of programme proposals.

Conclusion

17. Ako Aotearoa fundamentally has confidence in CUAP and its processes. While we cannot comment on operational elements and we believe that the Committee could usefully give more thought to its definition of quality, we are confident that at its work ensures that learners and other stakeholders can have confidence in university programmes.

18. We do believe that thought should be given to reforming the membership of the Committee and establishing a formal appeals process, in order to improve CUAP's alignment with INQAAHE's guidelines for good practice. We also recommend that the review panel should explore how effective CUAP's current processes are for ensuring that universities appropriately give effect to the principles of the Treaty of Waitangi in programme development.

Ako Aoteaora
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[6] Notably, no such appeals process is outlined in the current CUAP Handbook (Universities New Zealand, 2015). We do assume that the decisions of CUAP are subject to judicial review.

References

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