Te Pūkenga Academic Regulations: Summary of Feedback received

Overview

- The initial draft Academic Regulations was completed mid-April 2021 and endorsed to proceed to the network for feedback by Te Poari Akoranga on 12 May, Executive Leadership Team on 13 May, and Te Pūkenga Council on 1 June.

- The draft document was made available to the network and TITOs on 4 June 2021 with feedback mechanisms via online survey forms, Our Journey space, and academic regulations email.

- The Academic Delivery and Innovation (ADI) team engaged with network partners through ADI and Academic Regulations presentations as part of the Kōtui Kōrero visits in June and July.

- Feedback on the Academic Regulatory Framework received through all engagement mechanisms has been reviewed and summarised below. All feedback will be considered in the review of the framework and provided to the relevant working groups to inform the development of the underpinning policies, regulations, procedures, and forms.

Summary of feedback received

There was wide engagement with the draft document from across the network with submissions from individuals (learners, staff, industry), from associations (e.g., TEU) and from TITOs and subsidiaries. Several subsidiaries held focus group sessions to inform their submissions.

Much of the feedback has focused on the underpinning procedures and the submissions provide a wealth of information to inform working group discussions.

This report provides a summary of the feedback received, first on the overall regulations and then by section.

Overall feedback

There was qualified support for the approach taken in the document although there was significant commentary around the difficulty of forming an opinion without the detail of the procedures.

The intention to develop an enabling framework was largely supported; however, it was widely agreed that the draft document did not meet this intention consistently being a combination of general principles in some sections, and specific regulatory statements in others.

Several submissions noted the need for explicit regulatory statements to avoid doubt and support dispute resolution. As a result of this feedback, the working groups will be tasked with developing regulations where it is necessary to do so.

A scoping exercise will be undertaken to make some decisions on what might be required (policy/regulation/procedure/process/guideline/form) for each section of the framework.

There was a lot of feedback focused on language, formatting and the order of the provisions in the document with some submissions noting the order was not intuitive. As the framework will be made available on a digital platform, this will be less of an issue once it is finalised and published; however, a review of each section shows some duplication and potentially misplaced provisions. The scoping exercise will review and make some decisions around what provisions sit where within the framework.

A common terminology will be fundamental to the framework and the working groups will be tasked with deciding the appropriate terms for their area of development. The Academic Delivery and Innovation team will maintain oversight of this to ensure consistency across sections and between working groups.

Feedback samples

- We support the intention that the Regulations are based on clear principles, inclusive, learner centred, empower learners and avoid regulating unless absolutely necessary. However, we caution that principles are not a substitute for regulations. We understand and support that the intention is to design something new and positive.
- We appreciate and endorse the intention of Te Pūkenga to have the learner experience guided by strong and positive principles. We do not believe that these should be confused with regulations, but rather should sit at a guiding level above them. Regulations are used, inter alia, to make decisions on disputes. If the regulations are open to broad and varying interpretation, then they will not serve that purpose, and the resolution of disputes has a greater risk of being escalated to external resolution processes.
- The strength of Te Pūkenga is in its breadth of programmes across many disciplines, levels, learning contexts, delivery methods, pedagogical approaches. Let us ensure the regulations are there as an enabler and not as barriers.
- Common feeling was the Regulations are a good starting point, but staff had difficulty in deciding whether the provisions were appropriate without being able to see the supporting Policies and Procedures. Detail held in these will be vital. Important that this remains a working draft which is amended as PPF articles are created.

As a final note, one submission questioned whether legal advice would be sought before the regulations were released. Te Pūkenga will be seeking a legal review of the regulatory framework before finalisation.

Summary of feedback by section

SECTION	Summary and example of feedback received
Introduction	*The sector had a lot to say about the Introduction section of the document with some questioning its inclusion in a regulations document and others acknowledging the importance of scene setting for the framework. There was significant feedback on Te Pae Tawhiti and this will be provided to the Equity and Partnership team to consider.* - Overall positive response to inclusion of this information in the Regulations. Sets the scene and solidifies commitment to Te Tiriti o Waitangi partnership. It gives all learners an understanding of their place. - "Meeting the needs of Māori"; is this the extent of what we are providing? Why not aim to meet Māori aspirations rather than needs? - The purpose of the regulations should include consistency across multiple campuses and delivery platforms. While individual flavours will remain, the rules that apply, the fairness of treatment, and the duty of care, should be the same across the organisation - Stronger responsive practices' goal alludes to staff being "competent, culturally responsive, and reflective" (p.7), we think it is necessary to understand that, in order to ensure "competent, culturally responsive, and reflective" capacities are achievable throughout the network, staff need sufficient time and resourcing to engage in training where appropriate - The [document] mostly reflects campus-based delivery rather than a reflection of the "new way" Te Pūkenga will deliver learning. There is mixed visibility of whether and how the provisions apply to in-work learners, and some statements are unclear on the extent they would apply to online learners (both onshore and offshore) and learners based at international campuses.
Recognising Learning	*Most of the feedback received on recognition of prior learning (RPL) related to clarification of definitions and the processes for undertaking RPL assessment, particularly for a whole programme. Concern was expressed around the workload associated with RPL assessment and with the perceived lack of robustness and academic soundness of current processes.* *TITO feedback indicated interest in RPL/CRT for workplace learners* - Awarding RPL is an intensive and time-consuming process for both learners and staff to undertake. Assessment for a complete qualification via RPL would need significant additional investment of time allocation and additional moderation checks. - Will credit be granted for parts of a course? This should be clarified. The granting of credit for parts of a course could be problematic, especially where learning is delivered holistically. Operationally it will also be challenging to resource. - The opportunity for assessment of prior learning (APL) could prove useful for workplace learners, as there should be an abundance of verifiable evidence of current skills and knowledge which could be relevant.

Awards	*Points of clarification were made around informal awards and the Entitlement to Awards sections and these will be reviewed based on the feedback received.*
	Clarification was sought on the inclusion of English and te reo Māori on the graduation certificate and what this will look like.
	Most feedback in this section related to the granting of honorary awards and the criteria will be reviewed accordingly.
	- Suggest that the criteria for granting of honorary awards be extended beyond for "outstanding contribution to Te Pūkenga". This appears self-serving compared with, for example, "outstanding contribution to vocational education and training" or "outstanding contribution to applied research"
	- Parchments are written in both English and Te Reo Māori; will this apply to transcripts also? Could this be selectable or does it have to be both? Will the current SMS systems allow for this or will Te Pūkenga be producing all the awards?
Programmes of Learning	*Feedback on this section highlighted the need for a common terminology. In particular, the term 'programme regulations' means different things to different subsidiaries. For some, it is the full curriculum document (programme approval document); for others, it is a summary for learners of the programme-specific regulations (e.g., entry and selection criteria, requirements for completion, etc.).*
	Programme regulations clauses were described as confusing so will need to be reviewed for clarity. Discussion is needed around whether and in what circumstance they can 'override' the regulations.
	Feedback was also provided on programme approval processes and this section will be reviewed once Te Pūkenga governance structures and delegations are confirmed.
	- Approval of Programmes should be outlined in policy rather than in the Academic Regulations.
	- We endorse the clarity of the statement 'Programme Regulations cannot amend or override these Regulations except where there are particular requirements from an external regulatory or standard setting body'. The same clarity of language should be used in the Scope of the Regulations.
	- [The approval of programmes section] has introduced an extra layer of centralised administrative decision making to slow down the ability to be agile to our community or regional needs.
	- Without having the Programme Regulations and Procedures documents available, it is difficult to envisage how the Regulations will fare in practice
	- Current situation - any deviation away from the [Academic] Regulations must be in the approved Programme Document

Enrolment	*The operationalisation of enrolment across the network was of particular interest. Submissions provided detailed feedback on different aspects of enrolment and will provide food for thought for the Enrolment working group. Equity of access where there are limitations on enrolments will require a lot of thinking and clear procedures.*
	Regarding Refusal or Cancellation of Enrolment, the phrase "not of good character" generated a lot of comments. Procedures around this space will need to be very clear on the parameters for refusal or cancellation of enrolment and submissions provided some good examples of how this might be managed.
	- How will applications be managed nationally to allow learners to indicate their preferred campuses?
	- Workplace learning definition is not clear. Workplace learning is a valid delivery method within programmes and the 2nd paragraph implies that it only means apprenticeships.
	- There is no mention of a restriction on the number of times a student can re-enrol in a course.
	- Further information is required about what constitutes "insufficient progress…after a reasonable trial", and how insufficient academic progress will be dealt with generally to support students who are struggling.
	- Will learners who have been excluded from one location be eligible to be considered at another? Currently, learners who are excluded from one ITP may get a second chance at another ITP. If this opportunity is removed, the penalty of exclusion becomes harsher
Learning and Teaching	*Feedback on this section focused mainly on the underpinning procedures; however, a number of submissions noted the absence of specific reference to Mātauranga Māori and how it will be embedded in learning and teaching. Clauses relating to postgraduate study were also noted as missing.*
	Learner workloads generated a lot of discussion, particularly around how provisions were described in this section. Careful thought will be needed by the Learning and Teaching working group to clearly describe and define this section and the underpinning approaches.
	The section on concerns, complaints and appeals also needs to be carefully reviewed. The bundling of these into one section was questioned in many of the submissions.
	The Learner Misconduct section will be rewritten based on extensive feedback on this section and the Academic Misconduct section. Submissions questioned the use of 'misconduct' in what is intended to be an enabling framework and consideration will be given by the working group to reframing this.
	The relevance of this section to workplace learning was questioned in several submissions and this will need careful discussion with WBL.
	- Mātauranga Māori should be expressed in this section with explicit statements around how it will be embedded at Te Pūkenga
	- Learner workload provisions are subjective, unrealistic, and are open to interpretation and challenge (meaning of "equitable", "safe", "overwhelming")
	- The monitoring of learner progress and wellbeing is a core component of teaching and learning but demands a high level of engagement and time from

	staff. In short, it is a large part of the workload of staff. In order to be included in workload arrangements, this increased pastoral care and administration needs to be quantified.
	- We feel that 'Learner Support' indicates a deficit model and would prefer to use 'Learner Services'.
	- Replace Learner Research with Postgraduate Study; include reference to thesis extension and suspension; include approval of thesis application, supervisor/s and examiner/s; remove reference to procedures
	- A lot more needs to be said [regarding Learner Research], or detailed in the Research policy: Ethics, data management (what the policy is around storage and destruction of data from student research projects? i.e., who is responsible for the data if it is left on TP's storage system?), participation of students and staff in practice-based research or joint staff/student research, etc.
	- Complaints and appeals are 2 completely different processes. A student does not complain about an academic decision, they appeal it. Split into two sections, one for Complaints and one for Appeals
Assessment	*Assessment generated substantial comment and feedback which again focused primarily on the underpinning procedures and submissions noted the need for explicit guidelines around all aspects in the draft document, especially extensions, resits and resubmits, and academic integrity/honesty. There was a lot of discussion around what, when and how detailed course information would be provided to learners.*
	Resourcing for assessment in Te Reo Māori and learner te reo capability were raised in a number of submissions. While the intention is for this to be standard practice, it will still require some careful thought to ensure that it can be supported and appropriately resourced.
	Return of assessments generated lots of commentary with very little support for a ten-day turnaround, particularly for more complex assessments (e.g., capstone project) or assessment in higher level programmes (degrees and postgraduate).
	Feedback on the grading tables was extensive with almost no support for retaining the proposed achievement-based table. There was wide support for aligning achievement-based grades with the universities' grades (including +/-). Both tables will be reviewed in light of the feedback received and are likely to look very different to what was proposed in the draft document. Submissions also highlighted potential difficulties in implementing the Te Pūkenga grade tables in different SMS and IT solutions will need to be identified in some cases to enable this.
	- Providing assessment information to students before the commencement of a course may not be feasible. Tutors need to explain this information in the first week and show students where to find it on the Learning Management System.
	- Would be good to include a brief scene setting statement about what assessment/aromatawai is at Te Pūkenga and how it is used with the Recognising Learning section. While the Regulations apply only to summative assessment, a reference to the role and importance of formative assessment is needed.

	- Some indication of how equity of outcome will be incorporated into Te Pūkenga assessment practice would be good e.g., whether there be learner choice in assessment method? Multiple ways to evidence learning outcomes have been met? - Who will bear the cost of additional assessment/moderation? - Will there be access to an approved list of skilled subject matter experts for assessment [in te reo Māori] and moderation? - Assessment in Te Reo Māori: We feel the second sentence 'Determination of a learner's capability …' is unnecessary and may be discriminatory. We do not ask learners who will be assessed in English to go through this process. - Staff were concerned that in some instances the 10-day marking and return timeframe would compromise the integrity of the marking process. - 10 days for final grades from programme end date too tight for programme committee approval and subsequent thorough checking procedures. We currently use 15 days from course end date. - There are multiple terms used in these regulations for the process of reassessment including 'conditional pass'. It needs to be clear for students what they can request and how many opportunities they have for further assessment within a course - Academic Misconduct: We would like this to refer to Academic Honesty first, and then address if learner is not honest. Instead of using 'plagiarism-detection software' refer to 'content similarity detection software' – this represents what the software is capable of. Not all similarity is plagiarism.
Graduation	*There was little feedback around graduation; however, some submissions provided recommendations to consider as well as reinforced the importance of retaining current procedures which have meaning for local communities. TITO feedback was very receptive to the possibility of workplace learners being able to participate in graduation. Some work is needed in this space to identify the processes that need standardisation and where points of flexibility might sit.* *The aim for graduation will be to provide all learners with equal and equitable opportunities to walk regardless of the level of qualification.* - Suggest options for cultural dress at graduation should be included. Procedures should consider the cost of regalia and its impediment to participation in graduation for some students. - If there is to be a standardised regalia design – note the expense involved and the logistics of supplying each ITP with stock. - We have very defined and practical graduation processes/procedures which are historically closely linked to our community and would not like to see procedures so standardised they are alien or not meaningful in our ceremonies. - We do not put barriers in the way by students having to apply to attend. We invite the student/s as soon as their qualification is confirmed by our Academic Committee processes.

Next steps

- A Quality Steering Group comprised of representatives from across the network (including Te Pūkenga Work Based Learning) has been convened to provide oversight and direction for Academic Regulatory Framework working groups aligned to each section of the framework, for example, Enrolment, Assessment, Learning and Teaching, Learner Integrity, Concerns, Complaints and Appeals, etc.

- Working group membership has been drawn from across the network and they will be tasked with defining and developing the required artefacts (policies, regulations, procedures, process maps, forms, guidelines as required) and culturally appropriate approaches for their focus areas. All feedback received during and after the engagement period will be provided to the relevant working group to inform the mahi.

- In addition to the underpinning artefacts, the working groups will also review and make recommendations to the Steering Group of amendments to the relevant section of the academic regulations. All sections will be reviewed by a small working group prior to finalisation to ensure a consistent voice and approach across this document.

- The working groups will begin their work at the beginning of November with draft artefacts to be completed by the end of Q1, 2022. Engagement and feedback will take place across Q2, and approval, implementation, and training in Q3 and Q4.

- Network partners are welcome to engage with this mahi by emailing academicregulations@tepukenga.ac.nz.