

# Report: Workforce regulation: Quality Assurance of Teacher Education

To:	Hon Erica Stanford, Minister of Education		
Date:	16/04/2025	Deadline:	28/04/2025
Security Level:	In-Confidence	Priority:	High
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## Why are we sending this to you?

- This paper provides you with information on the quality assurance of teacher education programmes to progress your workforce regulation reforms.

## What action do we need, by when?

- We are seeking your agreement to the policy decisions which will be needed to strengthen teacher education quality assurance as part of Education Reform Bill (ERE).
- Please return the signed paper by 28 April so that we can progress to drafting your Cabinet paper on workforce regulation for SOU.

## Key facts, issues and questions

- You have previously agreed to shift approval and monitoring of teacher education programmes from the Teaching Council to ERO.
- We are seeking your decisions on the key policy proposals that will give effect to this decision, across ERO's scope, functions, powers and duties, including:
  - explicit functions in approving teacher education programmes, ongoing monitoring and review of programmes, and removing and placing conditions on approvals.
  - stronger powers to request information, including requiring providers to keep records and make them available on request, and to enter and review teacher education providers.
- A strong operational policy framework will be required to support the regulatory framework including clear guidelines for regulated parties and their obligations.
- ERO will brief you further on commencement timing taking account of broader changes. We expect MoE to take on its standard setting functions upon commencement of the Bill but there is an option to delay ERO's commencement of approvals and monitoring.

## Alignment with Government priorities

1. This report aligns with the Government's priority of developing the workforce of the future including leadership development pathways.

## Background – Workforce regulation reform in ERE

2. You have agreed to pursue reform of the workforce regulatory system for teachers [METIS 1344037 refers] and do this in ERE. One of the four objectives you have set for reform is:
  - **improving quality and consistency in teacher education and training** to ensure all teachers are adequately prepared to teach the curriculum in the relevant school or early childhood education setting.
3. In support of this objective, as set out in METIS 1346036, and verbally confirmed in our discussion with you on 11 April, you have agreed to:
  - shift all standard setting functions from the Teaching Council to MoE (including setting standards for teacher education programmes that lead to registration as a teacher); ✓
  - shift teacher education programme approval and ongoing monitoring and review functions from the Council to ERO; ✓
  - leave the Teaching Council in its current form to deliver registration and certification and competence and conduct functions. + majority of board to be appointed ✓
4. This brief now focuses on the teacher education programme functions and the role of ERO in delivering effective programme approval and ongoing quality assurance (QA). An effective QA system includes the activities that provide confidence that organisations and individuals adhere to specific regulatory requirements.
5. We use the language of teacher education programmes to capture both Initial Teacher Education (ITE) and teacher education programmes that could in the future be rolled out to support beginning teachers, should you decide to introduce such a requirement. ✓
6. This report covers:
  - the challenges with the current teacher education approval and QA powers;
  - decisions regarding the legislative changes that are required to give ERO a strengthened role in teacher education programme approval and QA;
  - the operational policy changes that will flow from the changes to roles and functions;
  - possible transition arrangements.

## The teacher education QA framework needs strengthening

7. The current teacher education and training system is not meeting your objectives or consistently preparing graduates. A significant body of evidence shows that many new graduates are underprepared to practice [METIS 1329069]. One of the key contributors to this challenge is the quality of the standard setting, approval, monitoring and review framework overseeing teacher education programmes and the outcomes they contribute to. More detail on the current and desired future state across each of these functional areas is outlined at Annex 1.

## Specific teacher education standards are the foundation of a good QA framework

8. The quality of any programme approval function largely stems from the strength of the standards it is being assessed against. The standards for qualifications that lead to registration are currently given effect to through the ITE Programme Approval Requirements, which the Teaching Council issues. The Teaching Council uses these requirements to



assess a programme's ability to prepare students to meet the Teaching Standards, with support.

9. The ITE programme approval requirements are less specific in setting the expected content and graduate results than international comparators we considered, especially England and New South Wales.<sup>1</sup> There is poor alignment between what is required of providers and Government's expectations of best practice in areas like curriculum and assessment<sup>2</sup>.
10. Your decision to move responsibility for standard setting to MoE will help to address this issue. You will directly be able to ensure standards set out the skills, knowledge and attributes with which ITE should prepare graduates with appropriate specificity and prescription.

### **Legislative powers in the approvals and ongoing QA framework are currently light**

11. You have decided to shift the teacher education programme approval and ongoing QA function to ERO from the Teaching Council. This is to align these functions with ERO's role and capabilities in QA across the education system and their focus on lifting teacher practice and student outcomes.
12. The Education and Training Act 2020 (the Act) contains an explicit power for the Teaching Council to approve teacher education programmes, but the power to revoke or place conditions on approval and undertake ongoing monitoring is only implied as an extension of this approval power. These implied elements were only outlined in detail last year through the Teaching Council in its ITE Programme Approval, Monitoring and Review requirements,<sup>3</sup> and the Teaching Council is in its early days of implementing the new requirements.
13. Additionally, there is no explicit power in the legislative framework for the Teaching Council to request information, interview relevant parties or enter premises to undertake a quality monitoring and review function. We understand the Teaching Council works with providers in good faith to obtain information and this is outlined in operational guidelines.
14. In this model, where practice guidelines rather than legislation set out requirements, there is a risk of providers being uncertain about the exact powers of the regulator and their rights and obligations. It also limits the ability for the regulator to implement a robust interventions framework with appropriate sanctions where programmes are not meeting expectations.
15. In comparison, NZQA is given explicit legislative powers to withdraw accreditation if there are reasonable grounds, place conditions on accreditation approval, and powers to obtain information in support of their enforcement role.

### **We need to go beyond a 'lift and shift' of functions to ERO ✓**

16. You have previously agreed to shift the Teaching Council's function of approving and monitoring teacher education programmes to ERO. This section outlines the policy decisions needed to give effect to this, and to strengthen the framework to address the challenges outlined above.
17. At this stage we are seeking your agreement that these powers sit with ERO upon the commencement of the Bill. We note that we will need to provide further advice on whether

<sup>1</sup> England has a Core Content Framework for ITE that tightly prescribes curriculum and assessment requirements in ITE, including specifying significant areas of content that should be taught. [ITT Core Content Framework](#)

New South Wales has detailed prescription related to curriculum coverage in their ITE programme requirements, including required EFTS time limits for literacy, numeracy and science.

<sup>2</sup> Noting that the Teaching Council has recently made changes to the Programme Requirements to better reflect the need to adhere to the Government's curriculum priorities.

<sup>3</sup> [ITE Programme Approval, Monitoring and Review requirements.](#)



these powers will sit with the newly proposed Director of Regulation (DOR) and associated powers in ECE, or the Chief Review Officer (CRO)<sup>4</sup>.

### **We are seeking your agreement to give ERO appropriate powers**

18. The key elements of policy direction relate to the scope, functions, and powers ERO will need in legislation and the duties of the CRO/DOR to perform their new role in approval and QA of teacher education programmes.

19. We have outlined key policy decisions and indicated where a provision currently exists in the Teaching Council's framework, is implied (i.e. not explicit in legislation but set out in Teaching Council operational guidelines) or is completely new. We are seeking your agreement to:

- expand the **scope** of ERO's role to include approval, monitoring and review of teacher education programmes (new).
- give ERO the following **functions**:
  - conduct approvals of teacher education programmes (exists); ✓
  - monitor and review teacher education programmes (implied); ✓
  - administer the preparation of reports on the undertaking and results of the review (new); ✓
  - place conditions on new or existing teacher education programme approvals (implied); ✓
  - remove approval of teacher education programmes (implied); ✓
  - share information with the Secretary for Education (similar function will soon exist as part of ETAB2 changes); ✓
  - work collaboratively with agencies that have a role in the regulation of the teaching workforce and in quality assurance of teacher education programmes (partially exists); and, ✓
  - publish and regularly update information on its operating approach to give effect to these functions (implied). ✓
- give the CRO/DOR the following **powers** to deliver these functions:
  - requiring, by written notice, and for the purpose of performing their functions, the teacher education programme provider to provide information by a specified date (implied); ✓
  - power to enter and review a teacher education programme provider at any reasonable time following reasonable notice (new); ✓
  - authorising any person who, in their opinion, is suitably qualified and trained, to exercise the powers of entry and inspection (new); ✓
  - requiring teacher education programme providers to keep records as directed by the CRO/DOR and make these available on request (new); and, ✓
  - charge a fee to cover the costs of the functions above and any appeal function (exists). ✓

<sup>4</sup> As part of the Early Childhood Education (ECE) Regulatory Sector review, a Cabinet paper proposes to establish a new position in ERO for a Director of Regulation (DOR). This is in addition to the current position of Chief Review Office (CRO) who is also the chief executive of ERO. Currently the CRO is responsible for all ERO's functions



- give the CRO/DOR the following **duties** in exercising these powers:
  - have an appropriate process for appealing decisions on removing or placing conditions on approvals of teacher education programmes (new);
  - develop an intervention approach and specify the data and information ERO will use to inform its approval and interventions decisions (new); and,
  - consult with the Secretary for Education before making final decisions on teacher education programme approval, removal of approval or placing conditions on approval (will soon exist as part of ETAB2 changes).

### **These new powers will strengthen the framework underpinning current practice**

20. As shown from the number of implied functions, many of these changes will provide a stronger legislative backing to what is already operational practice of the Teaching Council. For example, the Teaching Council currently requests information in support of a programme approval or review process and can interview the applicant and their key partners to satisfy itself that a programme is ensuring graduates meet the Teaching Standards with support. The Teaching Council also requires programmes to participate and co-operate in external monitoring.

### **The power to enter and review is a significant shift from the status quo**

21. There are some key areas that are more explicit than what is currently in Council guidelines and are likely to be controversial with tertiary providers. One of these areas is the power to enter and review a teacher education programme provider.
22. ERO considers this is an essential power to accompany the power to remove programme approval. To make robust judgements, ERO considers it will need to be onsite to see provision and mode of instruction, and to interview instructors and interview students. This will enable ERO to verify evidence, which is important before making regulatory decisions about removing or placing conditions on programme approval.
23. ERO will need to develop the operating model that will underpin this power. The power might only be used for providers where there are significant concerns about programme delivery and outcomes or it could be used more often. We consider it will be important to make this clear in operating guidelines and ensure the focus is on observation and interviews when onsite. We have tried to balance the rights of individuals with the need to provide ERO the tools it needs to perform its regulatory role effectively. We mitigate some of the risks by requiring reasonable notice for any site visits<sup>5</sup>.

### **Information sharing, consultation and collaborative working will be required**

24. You are establishing a regulatory system where workforce regulation functions will be split across three agencies: the Teaching Council, MoE and ERO. To support the Secretary's role in system stewardship, management and administration of funding, we have recommended a function to share information with the Secretary of Education. We have also included a function to work collaboratively with other agencies involved in regulation of the teaching workforce and agencies undertaking quality assurance of teacher education programmes to capture the need to work closely with the Teaching Council, NZQA and CUAP.
25. There could be significant network and teacher supply implications to the withdrawal of a programme approval, which could result in the closure of some tertiary providers. We consider that ERO will only apply withdrawal of programme approval as a final action following serious and or sustained failure of a programme to meet the expectations of approval. However, to help mitigate this risk, we have added a duty to consult with the Secretary for Education prior to making any final decisions on the removal of approval. <sup>9(2)</sup>  
(g)

<sup>5</sup> As set out under Charter 21 of the Legislation Design and Advisory Committee Legislation Guidelines (2021 Edition).



## A strong operational policy framework will be developed

26. Good regulatory practice requires attention, skill and collaboration. It relies on the regulator clearly articulating its role and how it will give effect to this role, including how it will exercise decision making and discretion. In addition, government expects regulatory agencies to provide accessible, timely information and support to help regulated parties understand the standards that need to be met and how to meet their obligations.
27. ERO will, therefore, need to develop an operational framework that sets out the details of how it will carry out its new role, how decisions will be made and by whom. It will need to develop associated information and guidance for regulated parties so they clearly understand what to expect and how to comply, and how ERO will monitor compliance.
28. ERO will also need to develop a process for appealing decisions on removing a teacher education programme's approval. These elements are proposed to be captured in the legislated functions and duties given their critical importance.

## Strengthening the standards for teacher education programmes will be a key first step for MoE to deliver

29. As outlined above, the development of standards that contain specific prescription and specificity will be required to give ERO a stronger framework to assess programmes against. The Council are currently in the process of revising the Teaching Standards and the amount of change needed will depend on shifts made following this process.
30. While the legislative changes will not take effect until approximately July 2026, MoE could begin to prepare for taking over the standard setting role before this. If another rewrite of the Standards is deemed to be required, consultation on the new standards will be necessary and will take time.

## ERO will then need to develop clear processes and guidelines

31. The Ministry and ERO will need to work closely together to determine the relative role of the two agencies between standard setting guidance and regulatory guidance. Feedback loops and information sharing protocols will be essential.
32. The Teaching Council has a detailed ITE Approvals, Monitoring and Review requirements document currently, of which ERO will need to produce their own equivalent document, linked to its clearly defined legislative role and powers. Some of the key new or significantly amended areas of such a document will include:
  - **Power to place conditions on approvals or withdrawal** – this will need to cover the explicit criteria related to continued failure to meet expectations and graduated interventions, such as required improvement plans, with removal of programme approval likely to be the last resort. This guidance will need to include information on what happens to students enrolled in courses that are subject to interventions (i.e. a condition not to take on any new students). It will also need to be clear that if a programme's approval is revoked, this would have no impact on students that had previously graduated from that programme.
  - **Data and information that forms part of monitoring and review** – the current Teaching Council guidelines indicate that a review panel will consider evidence such as graduate and employment data and feedback from graduates and schools on effectiveness. In other jurisdictions QA includes explicit measurement of indicators such as graduate employment rates.<sup>6</sup> We consider this to be an essential element of

<sup>6</sup> For example, Ontario collects data on the 5 year employment outcomes of teaching graduates as part of assessing their ITE accreditations for programmes



a QA framework going forward and it will be important for ERO to set out its processes for collecting this information and how it feeds into the approval process.


- **Reporting on undertaking of reviews** – As part of a more robust QA framework, we have proposed ERO have a function to administer the preparation of reports on the undertaking and results of reviews. Guidelines will need to make the process for this function clear and ensure data privacy obligations are adhered to.
- **Appeals process** – Alongside a more explicit power to revoke or place conditions on programme approval, ERO will need to set out its process for programme providers to appeal decisions.

33. The Ministry and ERO will need to be integrated into the frameworks for existing QA processes. The Teaching Council currently holds memoranda of understanding for QA with NZQA (for non-university providers) and CUAP (in universities) who hold responsibility for assessing the value of teacher education programme provision as an academically reputable tertiary offering, in the light of its standing in the wider tertiary system.<sup>7</sup>

## Transitional arrangements are needed

- do this now no delay.
34. It will take time for MoE to build its capability and capacity to deliver new programme standards and for ERO to build its capability and capacity to deliver these significant new functions and relationships with the tertiary sector.
35. We recommend MoE takes on its new powers upon commencement of the Bill but that the current teacher education programme requirements, alongside its other standard setting functions, and all existing standards set by the Teaching Council will continue to apply until such time that the Ministry develops new standards.

36. 9(2)(g)(i)



37. There will need to be time given to support programmes into compliance with the new standards and approval requirements once they are in place. Processes and timeframes for reapproval will need to be developed in consultation with the sector and consider the cost involved in changing programmes to meet new requirements.

## Risks

38. Moving responsibility for teacher education programme quality assurance from the Teaching Council to the Ministry of Education and ERO is likely to generate opposition from the sector, as previously outlined and evidenced through the 'lift and shift' consultation. In particular, the power to enter premises is the most significant shift from current practice and could be met with high opposition from providers such as large universities.
39. Teacher education programme providers are likely to view the uncertainty connected to the revision of the QA processes as increasing the compliance burden of operation. Given the fiscal environment for tertiary programmes, we will need to ensure that increased accountability for programmes is accompanied by appropriate support to ensure that the sector works with the Government rather than withdrawing its provision of teacher education programmes.

<sup>7</sup> This covers aspects such as assessing the research quality of a programme, its adherence to international academic quality norms and its connection to the wider tertiary system for course crediting purposes.

40. If revised standards are more prescriptive than the status quo, programmes and tertiary providers may object to them on the basis of academic freedom. MoE will need to carefully manage this risk through consultation with the sector on the design of any new standards. We have previously indicated that a consultation requirement could be incorporated in legislation to provide certainty to the sector that their voice will continue to be captured even though the function is shifting from an independent body into a government agency.
41. It is important that all accountability and outcomes-related information ERO may require from programmes is used ethically in ways that meet privacy obligations, while still being put to use in improving the sector. In particular, all data will need to be de-identified and collected at an aggregate level. We will work with ERO to undertake a Privacy Impact Assessment prior to final legislative decisions to ensure all privacy considerations are adequately addressed.

## Financial Implications

42. Building new implementation functions for standard setting in MoE and approval and monitoring of teacher education programmes by ERO will have sizable fiscal impacts (both transitional and ongoing operating costs). These costs are currently borne by the Teaching Council, which is majority funded by teacher fees, though met through government subsidisation.
43. Further detail on the operational cost impacts for MoE and ERO will be provided in subsequent briefings and a Budget 2026 bid will need to be developed.

## Next Steps

44. We are intending to take a paper outlining final policy decisions for workforce regulation system reform to SOU on 25 June. This will enable three months of PCO drafting ahead of the ERE's introduction in October 2025.
45. Your decisions on this paper will help to inform the SOU paper.
46. Key topics we still need to brief you on ahead of this SOU paper include:
- Teaching Council governance (including name change options); and
  - The standard setting role of the Secretary for Education, including consultation requirements and options to support certainty for the sector.
47. Given the timeframes required to obtain policy decisions in June, we will not be undertaking consultation on your workforce regulation package. However, we do suggest engagement with the Teaching Council ahead of SOU and can discuss this with you further at our next meeting.
48. 9(2)(g)(i) [REDACTED].

## Annexes

The following are annexed to this paper:

- Annex 1: Teacher education functions current and future desired state



## Recommended Actions

The Ministry of Education recommends you:

- a. **note** that you have previously agreed to shift approval and monitoring and review of teacher education programmes from the Teaching Council to ERO, and a strengthened legislative framework will support ERO to more effectively deliver its new role.

Noted

- b. **Agree**, as part of ERB, to expand the **scope** of ERO's role to include approval, monitoring and review of teacher education programmes.

\* MOE changes need to be clear first

ie advice on membership and individual roles in ERO

Agree / Disagree

- c. **Agree**, as part of ERE, to give ERO the following **functions**:

- i. conduct approvals of teacher education programmes;
- ii. monitor and review teacher education programmes;
- iii. administer the preparation of reports on the undertaking and results of the review;
- iv. place conditions on new or existing teacher education programme approvals;
- v. remove approval of teacher education programmes;
- vi. share information with the Secretary for Education;
- vii. work collaboratively with agencies that have a role in the regulation of the teaching workforce and in quality assurance of teacher education programmes;
- viii. publish and regularly update information on its operating approach to give effect to these functions.

9(2)(g)(i)

Agree / Disagree

- d. **Agree**, as part of ERB, to give the Chief Review Officer or Director of Regulations, the following **powers** to deliver these functions:

- i. requiring, by written notice, and for the purpose of performing their functions, the teacher education programme provider to provide information by a specified date;
- ii. power to enter and review a teacher education provider at any reasonable time following reasonable notice;
- iii. authorising any person who, in their opinion, is suitably qualified and trained, to exercise the powers of entry and inspection;
- iv. requiring teacher education programme providers to keep records as directed by the CRO/DoR and make these available on request;
- v. charge a fee to cover the costs of the functions above and any appeal function.

IS Chief Review Officer the right title?

Agree / Disagree

- e. **Agree**, as part of ERB, to give the Chief Review Office or Director of Regulations the following **duties** to exercise these powers:

- i. have an appropriate process for appealing decisions on removing or placing conditions on approvals of teacher education programmes;
- ii. develop an intervention approach and specify the data and information ERO will use to inform its approval and interventions decisions;

- iii. consultation with the Secretary for Education before making final decisions on teacher education programme approval, removal of approval or placing conditions on approval.

**Agree / Disagree**

- f. **agree** to remove the Teaching Council's current functions in relation to approval of teacher education programmes at the point ERO takes on its new functions.

**Agree / Disagree**

- g. **note** that we expect MoE to take on its standard setting functions upon commencement of the Bill, but that ERO will provide you with further advice on timing of the transfer of its functions as there is an option to delay commencement of ERO's functions.

**Noted**

- h. **note** that transition arrangements will need to ensure current standards and programme approvals apply until such time as new standards and processes for approvals are put in place to ensure continuity of the teacher education sector.

**Noted**

**Proactive Release:**

- i. **agree** that the Ministry of Education release this paper once you have received Cabinet agreement to the substantive legislative proposals with any information needing to be withheld done so in line with the provisions of the Official Information Act 1982.

**Agree / Disagree**



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16/04/2025



Hon Erica Stanford  
Minister of Education

15/25



Ruth Shinoda  
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16/04/2025



## Annex 1: Teacher education functions current and desired state

Function	Current state	Desired state
Standard setting	<ul style="list-style-type: none"> <li>Teaching Council sets programme standards for education programmes that lead to registration as a teacher and the standards new graduates will be measured against (the Teaching Standards with Support).</li> <li>Government can influence Council requirements through indirect levers, such as issuing a Statement of Government Policy.</li> <li>Standards are less specific than comparable jurisdictions about requirements of graduates.</li> </ul>	<ul style="list-style-type: none"> <li>MoE sets programme standards for education programmes that lead to registration as a teacher and standards for the profession.</li> <li>All standards provide clear articulation of expected skills, knowledge and attributes of graduates, and the ways that providers are expected to operate.</li> <li>Standards align with government's priorities for the education system and expectations for schools, centres and kura across curriculum and assessment.</li> </ul>
Approval	<ul style="list-style-type: none"> <li>Teaching Council sets approvals process and approves programmes that lead to registration in conjunction with other QA bodies.</li> <li>Approval is a legislated function, the ability to revoke approval or set conditions on approvals is only outlined in supporting guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>ERO sets approval processes, and determines how to apply standards to assess approval.</li> <li>Approval, the ability to revoke approval and place conditions on approval, and information gathering powers to support this function will be clearly set out in legislation to provide a strong framework for operational guidelines.</li> <li>Information sharing provisions will support effective and efficient processes between workforce regulatory and tertiary quality assurance organisations.</li> </ul>
Monitoring and review	<ul style="list-style-type: none"> <li>Teaching Council has no separately defined monitoring and review power distinct from approvals but sets out its monitoring process and powers set out in Programme Requirements Policy.</li> <li>Power not yet legally challenged.</li> <li>No powers to gather information, enter premises or interview relevant parties to support this function.</li> </ul>	<ul style="list-style-type: none"> <li>ERO carries out monitoring and review function, with clear legislative mandate for their powers.</li> <li>Function is supported by clear powers to gather information, enter premises and interview relevant parties.</li> <li>Release of review findings supports transparency about programme effectiveness including in indicators of graduate outcomes.</li> </ul>
Interventions	<ul style="list-style-type: none"> <li>Teaching Council sets out process for withdrawal of approval in Programme Requirements Policy, as well as other interventions</li> <li>Interventions thresholds and triggers are high level, and we are not aware of withdrawal of programme approval ever being used.</li> </ul>	<ul style="list-style-type: none"> <li>ERO has legislated responsibilities for approval and monitoring and review as outlined above.</li> <li>Guidelines set out clear circumstances for programme approval to be revoked on the basis of monitoring and review data and graduated interventions and supports to be provided before revocation as a final last resort.</li> </ul>