

A response to the 'Green Paper'

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ABSTRACT

This article is in response to the NZQA 's Green Paper 'A Future Qualifications Policy for New Zealand: A Plan For The National NQF' which was released in June 1997. I discuss the neoliberal bases for the proposals given in the Green Paper. Some of the issues analysed are; the role of NZQA in quality control, the emphasis on outcomes, unit standards based assessments and teacher workload. The notion of students making independent national choices from the courses and assessments offered is also considered.

Introduction

This article begins by discussing the neoliberal nature of the proposals in the Green Paper. The paper seems to be based on the notion of neoliberalism emphasising a culture of enterprise and competition. As Peters (1995) confirms, this culture is part of the New Right discourse and represents a deliberate attempt at cultural reconstruction. The new 'enterprise culture' (Peters, 1995) sees education restructured to deliver the necessary research skills and attitudes required by New Zealand to compete in the global economy. The move is from emphasising social goals to emphasising economic goals.

The quality control role of the NZQA is discussed and the absence of teacher representation on the 'approval agencies' is questioned. Educators are ignored in this document and in terms of secondary schools the *Green Paper* response questionnaire appears to have little use. It deals with broad issues, lacks detail and the questions seem to be framed to get the responses the NZQA wants. Decisions relating to secondary school qualifications seem to have been made without the input of teachers.

The outcomes based model of assessment is analysed. It is argued that detailed definition of outcomes will produce fragmented and superficial learning. The article notes that insufficient attention has been paid to the issue of teacher workload and resourcing in terms of assessments.

The effects of unit-standards on teaching and learning processes are considered. The value of unit-standards in promoting 'consistent standards' across schools and the effects of contextual factors operating in teaching, learning and assessment processes are discussed. Finally, student choice in terms of courses and assessments are considered. The article identifies some of the constraints shaping student choices.

The national NQF and neoliberalism

In a speech to the Tourism Education Forum on the 19th of July, 1997, the Chief Executive of the NZQA, Dr Douglas Blackmur notes that the *Green Paper* (June 1997):

challenges NZQA to establish principles and processes relating to the evaluation of the approval agencies;

challenges NZQA to establish principles and processes relating to the delegation to those approval agencies of the responsibility to attest if qualifications meet the registration criteria;

challenge(s) [NZQA] to develop a mechanism for overseeing National Qualification Framework quality and to develop principles and processes for monitoring the practices of approval agencies;

invites NZQA to develop principles and processes to ensure the transparency and public accountability of all matters associated with the National NQF (1997:2).

The *Green Paper* outlines the position of New Zealand Qualifications policy on how to address issues that have arisen in implementing the New Zealand NQF. According to the *NZ Education Review* (June 11, 1997), the key points in the *Green Paper* are that:

all approved qualifications will be allowed on the NQF alongside the unit-standards- based qualifications. New approval agencies to be established. The NZQA moves to an overall monitoring role. An emphasis on outcomes instead of assessment methods. A credit system allowing transferability of qualifications between exam-based and unit-standard-based systems. Creation of an excellence scale. Sixth form certificate qualification is retained.

In the *Green Paper*, Wyatt Creech, the Minister of Education, talks about skills and knowledge:

Those with expertise and innovative ideas have more opportunities and better prospects, both within New Zealand and internationally. Increasingly, firms are looking to higher levels of knowledge and skills among their employees in order to gain an advantage over their competitors. Nationally, the capability of our people drives New Zealand's overall competitiveness and our economic and social success (1997: 3).

Creech emphasises the need for stronger links between education and employment. The language used in pages 3 and 4 of the document emphasises its leaning towards the market-model education system with increasing promotion of skills, competition, investment and outcomes. It emphasises education for employment rather than education for education's sake. The changes in the curriculum assessment are based on neoliberal notion: Education is seen as an 'investment' for the individual good rather than for public good. Olssen and Morris Matthews confirm that the educational reforms in New Zealand are 'neoliberalism', neoliberal in that "the state seeks to create an individual that is an enterprising and competitive entrepreneur" (Olssen & Morris Matthews, 1997: 22).

In this model of education, educationalists have been left out of the decision making process. The emphasis throughout the paper seems to be on the employer and industry with phrases such as "when students and employers invest in education" (p6); "qualifications need to be credible and useful to employers" (p6); "convey to students and employers a value that is clear and credible" (p6); "qualifications to assist students' and employers' choices" (p6) etc. This paper conveys the message that learning is primarily for employment.

As Peters and Marshall argue, in education, commitment to the free market is based on the belief that 'excellence' and 'quality' will be achieved and scarce resources will be better used by the market-model of competition between schools.

That the market is seen as morally superior is evidenced by the opportunity to choose between schools, and the accompanying claim that this promotes freedom (Peters, & Marshall, 1996:72).

NZQA and quality control

The NZQA reforms are premised on a marketised conception of education. The *Green Paper* proposes that the NZQA will now have a quality control role and will appoint 'approval agencies'. The approval agencies will see if the qualifications meet the registration criteria. Will the NZQA or Ministry of Education appoint these approval agencies? It is mentioned on page 7 of the *Green Paper* that 'only bodies with appropriate expertise' will be appointed as NZQA approval agencies. 'Appropriate expertise' is not defined. Teachers are not considered part of this group. (What does this say about teachers?) It is not clear how consistency between the different approval agencies will be maintained. These agencies add yet another layer of control over the work of teachers.

The NZQA quality assurance criteria includes development, delivery and evaluation of teaching programmes for teachers. The NZQA has delegated certain provider groups like the New Zealand Polytechnics Programme Committee (NZPPC) of the Association of New Zealand (APNZ), the Colleges of Education Accreditation Committee (CEAC) of the New Zealand Council of Teacher Education (NZCTE) and the New Zealand Vice-chancellors Committee (NZVCC) the autonomy to design, develop and maintain their own curriculum. Schools, on the other hand, have no such autonomy. School qualifications, examinations and unit-standards based assessment are approved and implemented by the NZQA. The NZQA develops the examinations, pays the moderators/markers and presents the final certificates. All that the NZQA leaves to the teachers and schools is to teach the curriculum. NZQA as the overall guardian is the developer and the assessor of the qualifications. The vested interest of the NZQA in the role of maintainer of qualifications standards must be separated from its other roles.

The Green Paper proposes that the NZQA be the 'overall guardian of quality of NQF Qualifications' (p. 28). Here the NZQA will adopt an impartial role as regards to the different kinds of qualifications on the Framework. However, the NZQA has exclusively promoted unit-standards based assessment. (I think the Green Paper suggests the NZQA will now remain neutral and will not promote any particular system). This will be a difficult role for the NZQA. 'Quality' as explained on page 19 of the paper only refers to the design of qualifications and not in terms of teaching and learning.

Teaching-learning and unit standards

The *Green Paper* proposes that qualifications should have clearly stated outcomes that define what students will know or can do after successfully completing a part or all of a qualification.

Outcomes are intended to: give information to students, employers and providers about the qualification and its parts provide goals for teachers and students facilitate the transfer of credit gained from one qualification to another (1997:21).

The document also states that many providers are increasingly specifying outcomes for their programmes. This is not only because of demands from students and employers but it reflects the need for providers to define outcomes clearly for funding purposes. Codd, McAlpine and Poskitt discuss outcomes based assessment and note that:

Critics have also seen changes in a curriculum that views knowledge as a series of discrete bits of information that everyone must learn, and assessment as a method of measuring pre-specified learning outcomes. Fragmentation of the curriculum into a lot of specific learning outcomes is likely to lead to a narrowing of content and assessment requirements (Codd, McAlpine & Poskitt, 1995: 47).

This may lead to learners who are only good at answering questions based on the defined outcomes. Learning will thus become fragmented and superficial. The outcomes based unit-standards approach may also cause teachers developing their teaching to the tests.

The criteria for student assessment should be transparent but is this possible for all areas of the curriculum? The unit-standards approach to student assessment "collapses all learning into the language of 'inputs', 'outputs' and 'outcomes', where, in effect, all that counts is that which can be measured" (Roberts, 1997: 170). There is also a philosophical problem here. How far do we go on dividing knowledge and skills into units and not lose sight of the 'whole'? Codd, McAlpine & Poskitt (1995: 51) quote Simpson who comments that teaching by sequential units is based on a simplistic model of learning and teaching that assumes that learners only learn what they are explicitly taught. However, we know that learning is not exclusive to defined outcomes.

The unit-standards approach has not been accepted by many teachers, schools and universities. The *Green Paper* talks about the Framework and the unit-standards approach meeting the needs of the industry. The *Green Paper* states:

The unit standards approach has helped to recognise a broader range of educational achievement by testing a greater number of skills, by making educational standards more explicit, and by promoting consistent assessment across different learning settings (1997: 14).

The Chief Executive Officer of the Manufacturers' Federation, Simon Arnold (New Zealand Education Review, May 14, 1997) gives his views on the Framework and its benefits to industry it gives clear basis for assessment for skill-based training. ITO'S allow industry to specify their own training needs, develop qualifications and purchase the necessary training - an improvement on the old industry training boards.

Arnold goes on to define some problems with the Framework in terms of industry training. Industry does not just want employees with specific skills but it wants adaptable people with a good knowledge base and specific skills. According to Arnold, qualifications 'broken down' into individual unit standards and performance based assessment on each unit of work may work for skill based training but perhaps does not work so well for wider conception of knowledge. Arnold notes that their first doubt is that the specification and assessment of knowledge can be subject to this kind of 'reductionism'. Other problems he highlighted are that: it is questionable whether the Framework was going to meet the needs of all those who use the qualifications; that the Framework assumes that the purchaser - government or ITO is the only one responsible for specifying educational outcomes and that accountability for public funding is the dominant requirement; the Framework involves a huge commitment of resources; and the costs are enormous and its seamless feature and the co-ordinated approach to unit standards make it look more like a straitjacket. Arnold stresses that what New Zealand needs is a dynamic economy and an equally dynamic education system. The 'one size fits all' system will not provide us with such an education system.

Many subjects (knowledge and skills) like English, History, and Biology are not easily divided into small, sequential units. Elley confirms that students learn clusters of concepts and their knowledge is "fragmentary and relative, not neat and absolute" (Elley, 1995: 82).

Assessment using small, sequential unit standards should not be used where skills are required for problem-solving, creative writing and critical thinking. Teaching based on clearly defined outcomes can bring about teaching focussed on these outcomes at the expense of wider, higher level teaching and learning. As Elley (1995) comments, standards-based assessment for 'high stakes' assessments, eg for winning scholarships and for employment, is debateable. Darrell Latham (in *Education Today*, April 1977:8), the Director of Central Otago Education Centre - Dunedin College of Education asks whether we are suffering from the "overdose" of assessment/recording/accountability syndrome. Increased assessment does not necessarily mean improvement in learning.

Reducing the number of units will go some way towards reducing the fragmentation of the curriculum. Larger unit-standards will perhaps be more holistic statements and not just have low elements. Reducing the number of units will also reduce the time and the resources needed for task design, assessment, recording and moderation. Smaller number of unit standards will not only

reduce workload but will allow teachers greater flexibility in preparing teaching resources and assessment tasks relating to their particular context as teaching is contextual. As the *Te Tiro Hou* (PPTA, 1997) document discusses, re-assessment is a major factor in teacher workload. Students are able to resit their assessment but time has to be arranged outside class time. Smaller number of units should also help this problem.

Offering unit standards at two different levels in the same class is difficult, especially when a certain amount of teacher help/input is required. It is a challenging task, within time constraints, to prepare two different sets of content, assessments and re-assessment tasks for the same class. These should be restricted.

The *Green Paper* (pp. 24-25) proposes to develop an excellence scale for the Framework for subjects assessed against unit standards. This excellence scale will perhaps go some way towards reducing re-assessments and motivate the more able students. This scale will also prevent standards being set too high, for they may actually become barriers for some of the less able students, those that the Framework was said to help. However, the excellence scale should only be added to specific subject areas, where appropriate.

According to the *Green Paper* (p. 14) the unit standards approach has "promoted consistent assessment across different learning settings." How can we refine our teaching and assessment procedures so that the level of mastery is not affected by the way we teach? As Elley (1996) argues, even if standards are clearly defined for subjects, there are contextual effects in the assessment process itself that does not allow one to describe students' current level of understanding. There are a range of factors in different schools that impinge on a student's work. Time allowed for each unit is one such factor. The amount of guidance a teacher gives his/her students also affects the results. One teacher may warn a class beforehand to prepare certain topics for assessment and another may not. This may undermine the credibility of the assessment. How a question is framed also affects the results. How much choice is available in an assessment? These are variables and must be taken into account if there is to be consistent assessment across different schools.

With all the will and expertise in the world, teachers in school A cannot know what standards are currently being adopted in school B ... when each has taught and tested the units differently. Each operates within different frameworks of standards, depending greatly on the calibre of their students and the tradition of their institutions (Elley, 1995: 91).

Student choice

The *Green Paper* proposes that national school examinations, School Certificate, University Bursaries and Scholarship may be registered on the Framework. These would provide credits towards the New National Certificate in Education Achievement.

This means that, where options were available, secondary students could choose how they wished to be assessed - whether through examinations, internal assessment, or some combination of assessment methods (1997: 27).

Peters and Marshall (1996) note that certain notions of freedom and choice underpin the educational reforms. The assumption is that students and parents are not only capable of choosing the best educational programmes but it presumes that the students' choices have not been manipulated in some way. Students' choices are influenced by the information they possess. Peters and Marshall (1996) point out that the needs and interests of the students (the autonomous choosers) are being shaped through ideologies and the information that comes from the government agencies like the NZQA. The information this provides emphasises the need for skills, the continual need to be reskilled, and the economic motives for getting educated which, under this ideology, is equivalent to buying the best quality education.

As the *Te Tiro Hou* (PPT A, 1997) document discusses, students from the more socioeconomically advantaged areas are more likely to have the information to understand which qualification has the higher 'currency' in the employment world.

Even where the alternative qualification offers considerable advantages in the nature of the curriculum and the approach to assessment, it will not be valued as highly as a more traditional, exams-based approach. Hence students who might benefit from the alternative qualification choose the more highly esteemed award, perhaps with failure or loss of motivation and interest in education as a result. If, on the other hand, they do choose the alternative, they risk losing future educational or occupational opportunities because their credential is not respected (PPTA, 1997: 107).

The *Green Paper* states that this flexibility for secondary schools will allow students to choose the way in which they want to be assessed. If schools do offer both unit-standards based assessment and examinations teachers will have to prepare programmes to cover both types of assessments giving rise to additional workload. The costs involved are also great. Secondary schools running two parallel assessment systems will have to have resources to implement both systems. Parents and students will pay the increasing examination and qualification fees to the NZQA (the National Examinations fees, unit standards fees and the hook on fees etc).

Who really exercises the choice in assessment, students or schools? Schools will decide which form of assessments they will offer depending upon the courses offered and the resources available. Schools with limited resources will not have the ability to offer many choices. Students choices thus will not only be limited by the information they possess but also by their school and its socio-economic status. This may result in a class system in our education system, an inequitable, two tier system.

With regard to the notions of freedom and choice in the proposed reforms, Peters and Marshall (1996: 92) argue that students and parents are presumed to be not merely capable of deliberating upon alternatives and choosing between the programmes offered according to their individual needs and interests, but it is also presumed that it is part of human nature to make, and want to make, continuous consumer style choices.

The Framework is designed to breakdown distinction between the vocational and the academic areas. Parents and pupils will still make judgements about the different subjects, schools and their status irrespective of what policies are in place.

The *Green Paper* proposes that a range of different qualifications gain credit on the Framework. It would perhaps be very difficult to achieve parity between all the different types of qualifications. Some qualifications will always have more status than others.

Students from advantaged backgrounds are more likely to have the information to understand which qualification has the higher currency in the world beyond school (PPTA, 1997: 107)

According to Peters (1995) the reforms were based on the New Right thinking including the public-choice theory, agency theory, transaction cost analysis and the new managerialism. These theories assume that all human behaviour can be explained in terms of self-interest and that individuals are 'rational utility maximisers'. This idea of an individual's self-seeking behaviour in the market-place leading to the most effective and efficient distribution of public goods and services is used by the New Right to oppose the welfare state. This seems to be the basis for encouraging a system where students are 'free to make the best choice'.

The *Green Paper* states that the National Certificate in Educational Achievement is the major qualification and credits towards the National Certificate will be possible through national school examinations and/or unit-standards. The National Certificate in Educational Achievement ought to be attainable through examinations or a mixture of examinations and unit-standards. If the National Certificate were attainable on the basis of units standards they could be achieved in flexible times. It is possible for some students to complete the certificate before the compulsory school leaving

age. That would increase the custodial role of schools and would most likely present problems for student motivation and direction because students will be kept at school to fulfil legal requirements. There is a conflict here between the requirements of the Education Act and the flexible attainment of the National Certificate that will need to be addressed.

Conclusion

The proposals in the *Green Paper* are based on notions of neoliberalism which encourages a certain ethos of choice and competition. The market-model based education system is promoted. It is suggested that for a dynamic New Zealand economy we need an education system that responds to the needs of industry. The New Zealand Business Round Table however, does not seem to be happy with the way the NZQA reforms are headed.

the NZBRT's support for a closer alliance between education and the 'needs' of employers is coupled with a call for a rigorous 'general' (core) curriculum based not on a 'unit standards' mentality but (ostensibly) a much broader conception of knowledge, learning and education (Roberts, 1997: 183).

Teachers left out of the whole decision-making process have little control over the setting of standards, yet teachers are accountable and have been given the responsibility to make sure that students achieve.

Teacher input is important not only at the highest level of decision-making on qualification. At developmental level it is indispensable (PPTA, 1997: 109).

For teachers to meet the needs of the students adequate resources must be available and the workload must be manageable. The timeframe for the implementation of the proposals must be realistic and the teachers must be consulted. While the *Green Paper* identifies some teacher concerns, it still has not addressed many issues and has left many questions unanswered.

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