



Submission to the Education and Workforce Committee

Education (Vocational Education and Training Reform) Amendment Bill

13th October 2019

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1. Seafood New Zealand Limited welcomes the opportunity to submit on the Education (Vocational Education and Training Reform) Amendment Bill.
 2. Seafood New Zealand is a professional organisation delivering industry good services for the wider benefit of the seafood industry. The Seafood Standards Council, an official committee of the Seafood New Zealand board plays a leading role in developing and presenting the seafood industry's response on legislative and regulatory proposals affecting the industry in the areas of seafood production and processing.
 3. In general, the seafood industry has welcomed the Reform of Vocational Education and we support the establishment of a vocational education system that is led by, and responsive to, industry. This has been one of the criticisms of the current system, it simply is not flexible enough to meet the diverse needs of the primary industries, including the seafood industry, and has many prohibiting system settings. We make the following comments.
 4. Bill clause 49
New Clause 222B Functions of the NZIST
With respect to industry training, the bill moves the responsibility for arranging training from ITOs to the newly established NZIST. There is significant concern in those industries who have tried to operate within the current polytechnic system as it has failed to deliver relevant industry training in a manner that accommodates the level of flexibility required by those employers engaging in the process. Hence many employers have opted for conducting workplace-based training themselves, either through the employment of trainers, using private training establishments or independent trainers/assessors who are able to deliver the flexibility required.

The system needs to ensure that by moving the function of arranging training to the NZIST that this level of flexibility is maintained and even enhanced in order to allow industry and employers to access training in a manner that meets industry need. The alternative is that employers will continue to train staff to ensure they are competent to carry out their role,

however may not opt for the formal assessment of qualifications, which is where the learners primarily derive benefit. This would be detrimental to the system.

5. New Clause 222K Determination of Policy

222K (2) requires NZIST's council to establish an academic board consisting of the CE, members of the staff and students of NZIST to advise on matters relating to work-based learning, amongst others. It is somewhat concerning that industry plays no role in this – industry must have a role in providing advice relating to work-based learning and training to the NZIST.

6. New Clause 222L Advisory Committees

The bill requires the NZIST's council to establish a staff, student and Maori advisory committee. Given the Government's desire to create a unified and cohesive vocational education and training system, the concerns as outlined above, and for the NZIST to be truly responsive to meet the needs of industries, employers and learners, clause 222L should be amended to also require the NZIST to establish an industry advisory committee, to formalise the engagement link between the NZIST and industry.

7. Bill Clause 51 Functions of Authority and 57 Rules

Amended Clauses 246 and 253

The bill adds new clauses (246A (1) (da) and (db) in relation to new functions of NZQA to monitor workforce development councils and amends the clause (253 (gb)) to require NZQA to prescribe quality assurance requirements for workforce development councils relating to the performance of relevant functions of workforce development councils. Both the function of monitoring and prescription of quality assurance requirements needs to be limited to only those functions relating to the Qualifications Framework and moderation.

There are significant concerns with the system settings and rules currently being applied by NZQA with respect to registration of qualifications and unit standards, and the approval of programmes. The various rules have a significant impact on the ability to develop programmes that meet industry need. The timing and process for registration and/or approval often means that the system is not able to react quick enough to meet the immediate demand. If the purpose of this reform is to create a system that truly meets industry and learner needs, then these system settings need to be significantly improved.

The Act must ensure NZQA gives effect to the functions of the workforce development council relating to the Qualifications Framework. They must review and adapt their systems to align with an industry-led system. NZQA must ensure that any industry programme put forward is endorsed by the relevant workforce development council, prior to its approval.

8. New Clause 479 Establishment of workforce development councils

The bill (Clause 479 (2) (c) and (3) (a) proposes that an Order in Council will set out governance arrangements for workforce development councils. It is imperative that industry representation is stipulated as part of the governance arrangements, in order to ensure that industry needs are met, and employers and learners can fully realise the benefits of an industry led-system.

9. New Clause 482 Functions of workforce development councils

Leadership (a) – the function of the workforce development councils should be extended to include development of and advocacy for career pathway development, i.e. to provide skills leadership and develop career pathways for the specified industries.

Advisory and representative role (j and k) – the current rules and lack of flexibility around what can be funded with respect to industry training has been one of the issues the reform seeks to fix. A one size fits all does not work when it comes to industry training – this has been acknowledged already. There will be a level of flexibility required in order to ensure the system achieves the improvements the government seeks.

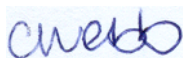
Workforce development councils will be in the best position to inform the Tertiary Education Commission in areas of both policy development and investment decisions in the work-based vocational education and training space.

The legislation needs to be strengthened to ensure that the role of the workforce development council is one of more than just providing advice to the Commission on investment but also includes the area of funding policy development, and clause 482 need to be amended to incorporate this role, and that the Commission must give effect to the advice received.

10. In conclusion, we would like to reiterate that we welcomed the Reform of Vocational Education. It was pleasing to see the review team given the mandate to completely re-think the system and to propose such ambitious changes. However, we urge the Committee to consider this submission and proposed amendments, in order to ensure the legislation allows for an industry-led system that provides benefits to the employers and learners it engages, and New Zealand as a whole.

11. We would like to be heard by the Committee.

Yours sincerely



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