



Submission to the Ministry of Education

Reform of Vocational Education, Discussion Document

5th April 2019

1. Seafood New Zealand Limited welcomes the opportunity to submit on the proposals as outlined in the Reform of Vocational Education consultation discussion document.
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. The seafood industry is a stakeholder in the Primary ITO and as such supports their submission. In addition, we would like to make the following comments.
4. The seafood industry has had concerns regarding certain aspects associated with the current vocational education system and 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.
5. However, we also urge caution in rushing the next steps and believe, that as there are still many details to be worked through, the Government needs to take the opportunity to carefully consider the decisions it needs to make, and to further consult with industry.
6. We whole-heartedly support the establishment of a vocational education system that is responsive to industry needs. This has been one of the criticisms of the current system, it simply is not flexible enough to meet the diverse needs of the seafood industry and has been prohibiting in many cases.
7. The system needs to allow for the many industries it is designed to serve. This includes reconsidering the current policy settings around learning and training structures. Industries need the ability to structure learning as and when it is needed, often in small sized bites and over time-frames that suit the needs of the business.

8. We support the concept of Industry Skills Bodies (ISBs) to give industry a stronger voice within the system. We support ISBs undertaking the role of providing skills leadership and coordination of industry's effort to identify and plan to address future skills needs.
9. We also believe industry has a critical role to play in the areas of, setting and approving the industry specific standards and qualifications required, and programme and curriculum design. This is imperative so the learners they will employ will achieve the required skills and knowledge to be successful in the work place.
10. However, we believe the role of ISBs should also include the interface between employers, learners and providers that is similar to current ITOs. It is difficult to see how the newly established NZIST and providers will be able to fulfil that role across the entire vocational education system. Our concern is that some employers, and more importantly learners, will get lost in the system or simply won't engage with it.
11. The system needs to recognise that not one-size fits all. Training and learning occurs in a myriad of ways, both informal and formal, on-job and off-job, and the system needs to recognise and allow for this.
12. We agree that a unified funding system is required. The current model does not work. It is fragmented with too many inflexible rules that make training in some situations almost impossible.
13. The funding model therefore needs to recognise that not one-size fits all. To achieve the full benefit of learning, funding needs to be sufficient for all aspects of the system. This includes the funding of ISBs. A system that relies on user-pays does not recognise the true economic benefit of highly skilled and competent people to industry or to New Zealand's society and economy.
14. We would like to reiterate that we believe the Government needs to take the time to carefully consider the next steps, and the significant amount of detail to work through. We would be happy to further engage in this process or in any further consultation opportunities, and would like to thank you for the opportunity to provide this feedback.

Yours sincerely



Cathy Webb

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