

# Submission to Ministry of Education on Options for the future of Work-based Learning

## February 2025

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### MinEx

MinEx is the national health and safety council for New Zealand's extractive sector – the mining, tunnelling and quarrying industry. Our principal purpose is to help industry achieve its goal of being free from fatalities, injuries and diseases. MinEx is funded by the mining and quarry sectors – through the respective associations and a number of individual companies – with a mandate to:

1. be the main point of contact with the Ministry of Business, Innovation and Employment (MBIE), WorkSafe New Zealand (WorkSafe) and other agencies on all extractive sector matters related to health and safety; and
2. through leadership and consultation develop an industry view on relevant legislation, regulations, guidelines and training matters, and work with MBIE, WorkSafe and other agencies to adopt and implement those views, as appropriate.

To inform this submission, MinEx consulted with Straterra, the Aggregate and Quarry Association, the Institute of Quarrying NZ, E tū, AusIMM, Civil Contractors NZ and many other mining, tunnelling and quarrying operators.

We make the following submissions in relation to the consultation document on Options for the future of Work-based Learning.

### Key points

- We strongly support the Independent Work-based Learning model as it ensures work-based learning is better connected to employers, including small and medium enterprises, to ensure they have a sense of ownership of industry training.
- We are strongly opposed to any restraint on new organisations offering industry training programmes.
- We put the case for an Infrastructure and Extractives Industry Skills Board.

### General comments

Industry training is highly valued by employers in our sector as it develops the skills necessary for employment, such as working as part of a team, reliability, as well as technical skills. However, there is a disconnect between the level of compliance, and the functions of NZQA, Tertiary Education Commission (TEC), MBIE and the Ministry of Education, and the consistency of the competencies of graduates holding the same qualification delivered in different modes. There is little acknowledgement of the excellent training and investment by employers that supports the industry training system.

Our sector covers mining, quarrying and tunnelling and as such many of our sites are in remote parts of the country. It is therefore critical that flexible training delivery and pastoral care for learners is available throughout the country. Where possible, training should be delivered at site. While this will depend on course content, the regions are better suited to onsite and e-learning options rather than having to travel long distances to attend classroom-based training.

We have seen in previous delivery of training models that some trainers have been precluded from delivering training through those organisations arranging training, and this has impacted on that flexibility needed by our sector. Also, training and assessment material has been withheld from potential providers without reference to the sector who provided much of the intellectual property (IP) in the development of Unit Standards.

The measure of competency should be based on practical experience (where possible) and signed off by technical verifiers, rather than it being solely on written answers. Any VET system needs to provide for capstone assessments as a means of verifying competency of a Unit Standard or micro-credential.

There are requirements within the Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations 2016 (MOQO) for managers to obtain a Certificate of Competence, the criteria for which is determined by the New Zealand Mining Board of Examiners. These require completion of several nominated Unit Standards, which while originating in qualifications, do not constitute a NZQA qualification. Learners do not always enrol in a qualification.

## **The Independent Work-based Learning model**

We support the Independent Work-based Learning model as it gives industry control over the delivery of work-based training. This option enables choice for employers and students by continuing to allow any provider to offer industry training programmes, provided they are endorsed by an industry led Industry Skills Board.

There has been far too much disruption for employers and learners over the past few years with the COVID pandemic and the continual review of the vocational education system. This option will lead to a more straight forward transition with less potential to disrupt current apprenticeship and traineeship relationships.

Shared roles proposed under the Collaborative model could cause duplication, blur accountability and create a disconnect between pastoral care and education. An overly complex work-based training model risks industry disengagement, including poor trainee and apprentice outcomes, labour shortages, project delays, weakened national resilience and potential negative impacts on national consistency of training.

We do not see the potential competition created by the Independent model as a negative as the industry will decide who they want to use from a learnings outcome perspective. We have a variety of training providers, including polytechnics (ITPs), private trainers and private training establishments (PTEs) delivering training in our sector and this flexibility to meet regional needs, particularly for those seeking to obtain a certificate of competence under mining regulations, is critical to us.

## **Additional design considerations**

### **Moratorium on new organisations offering industry training programmes**

The consultation document states that *“To ensure stability, there may a case-by-case moratorium on new work-based learning providers until the new Collaborative work-based learning model took effect.”*

We are strongly opposed to any restraint on new organisations offering industry training programmes. It is important that there are no constraints on suitably qualified trainers being used by industry, and that all training and assessment material previously developed by industry training organisations using sector content, are readily available to trainers that industry choose to use. It is also critical that such training and assessment materials are kept up-to-date to meet the ever-changing demands of our sector.

It is critical that flexible training delivery and pastoral care for learners is available throughout the country.

A number of organisations in our sector currently use Australian trainers and Australian training programmes due to their suitability to mining and quarrying operations. While improving workers skills, this denies their workers recognition within the NZQA system. We see opportunities for these providers to be accredited in New Zealand and have their programmes mapped to New Zealand qualifications. This will enhance the calibre of training offered to our sector.

### **An Infrastructure and Extractives Industry Skills Board (ISB)**

The infrastructure sector is the backbone of New Zealand's economy, enabling productivity, resilience, and long-term growth. We support the collective grouping of industries responsible for civil construction, extractives, three waters, electricity engineering, and electrical networks into a standalone ISB.

These industries require a dedicated approach to vocational training to ensure the workforce is equipped to meet current and future infrastructure demands. Having a dedicated ISB would ensure the agility, industry responsiveness, and effective skills development the sector needs to support government infrastructure priorities and proposed growth in mining.

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