

Submission to Ministry of Education on the proposed Redesign of the vocational education and training system

12 September 2024

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.

Straterra will not be making a separate submission and endorses MinEx's submission as representative of the entire extractives industry. Straterra is the industry association representing New Zealand's minerals and mining sector.

We make the following submissions in relation to the proposals on Redesign of the vocational education and training system.

Key points

- We agree that a strong industry voice in vocational education (VET) is critical. The VET system needs to be better connected to employers, including small and medium enterprises, to ensure they have a sense of ownership of industry training.
- In Proposal 2, we support Option B – replace Workforce Development Councils (WDCs) with a small number (possibly up to eight) of more focused, industry-specific standards-setting bodies. The arrangement and delivery of training should not be included in the work of these bodies.
- We are neutral on whether the responsibility for functions currently provided by WDCs could be transferred to the New Zealand Qualifications Authority (NZQA).
- We are strongly opposed to any restraint on new organisations offering industry training programmes.
- We support the allocation of dedicated funding for standards setting.

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 systems needs to provide for capstone assessments as a means of verifying competency of a Unit Standard or micro-credential.

Our sector is continually changing therefore learning programmes need to be continually updated to ensure they are current. With the support of our Workforce Development Council, Hanga-Aro-Rau, we are now reviewing standard setting and updating qualifications in our sector. This did not happen under the previous Industry Training Organisation model due to funding constraints.

There are requirements within the Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations (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, while originating in qualifications, do not constitute an NZQA qualification. Learners do not always enrol in a qualification.

We anticipate that the use of micro-credentials will increase in our sector and therefore it is important that approvals required by NZQA and the TEC are not held up by these organisations. Some approvals have been delayed in the past and need to be sped up under the proposed VET system.

There appears to be very little Government oversight of NZQA and TEC and while this consultation doesn't include these organisations, we strongly encourage a review of the performance of these organisations and how they support industry led vocational education, as there is no evidence they currently do this.

Establishing an industry-led system for standards-setting and industry training

We support Option B – replace Workforce Development Councils with a small number (possibly up to eight) of more focused, industry-specific standards-setting bodies.

We strongly agree that this option enables choice for employers and students by continuing to allow any provider to offer industry training programmes. It also maintains industry-led bodies that are dedicated to standards-setting and planning to meet strategic workforce needs while avoiding the potential conflicts of interest that can arise when these functions are connected to arranging training.

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.

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.

Additional design considerations

Industry-led standards-setting

We have enjoyed a good relationship and strong support from our Workforce Development Council (Hanga-Aro-Rau). We believe that stand-alone industry-led bodies should be responsible for standards-setting, including qualification development, workforce forecasting, and ensuring that provision meets industry needs, however we are neutral on whether the responsibility for this function could be transferred to NZQA.

As a small sector, unlikely to warrant our own standard setting body, we would be interested to consider the option of using NZQA for these functions, provided the level of service currently available to us through Hanga-Aro-Rau is not compromised.

Moratorium on new organisations offering industry training programmes

We are strongly opposed to any restraint on new organisations offering industry training programmes. As mentioned above 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.

A funding system that supports stronger vocational education

We support the allocation of dedicated funding for standards setting. The previous arrangements under which Industry Training Organisations funded their standard setting function out of the funding they received for work-based enrolments created competition for funds that inevitably got diverted away from standard setting and review of qualifications.

We generally support plans to increase funding for provider-based vocational education in order to support the retention of regional provider-based vocational education.

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