

19 February 2025

Submission on Options for the future of Work-based Learning

Introduction/Preference

Thank you for the opportunity to provide feedback on the Consultation Document that is offering two possible models for work-based learning.

PrintNZ is the industry association that represents the print and packaging industries in New Zealand. We have around 500 member businesses located across the length and breadth of New Zealand, with our membership representing more than 85% of the turnover of the combined industries. Our membership includes businesses with as few as 1 employee through to those with more than 1000 employees.

PrintNZ was a sister organisation to the former (successful) Communications and Media ITO, managing the training for the print, packaging, sign and journalism industries. In 2014 the entity was merged with Competenz and we have remained actively engaged with industry training and continue to champion vocational education.

Print and packaging are niche industries that are vital to the economy. They are incorporated into almost every product and service made in New Zealand whether used locally or exported. The industries are highly skilled and rely on training that is fully delivered in the workplace.

Work-based learning is the most efficient and effective form of vocational education – it builds vital life skills as well as technical skills. It is also cost effective as employers meet much of the cost of overheads associated with the training such as provision of equipment, trainers, mentors and wages.

Therefore we need to ensure that we can access work-based learning that is industry-led with a strong employer voice, cost effective, learner centric, consistent, sustainable and accessible.

Our preferred model is Option B – the Independent Model. However we need to ensure that any new model takes the following into consideration:

- Work-based learning needs to remain exactly that – learning that is undertaken in the workplace and supported by the vocational education system.
- Work-based learning needs to be for industry, by industry.

- Niche industries that provide training on a national basis should not be disadvantaged or ring-fenced in any way.
- The system allows for diverse service models for specialised sectors
- The contribution to both the cost of learning and the pastoral care provided by employers is recognised and acknowledged in any funding decisions.
- The system needs to be adaptable and accessible so that employers do not become disengaged from formal training and seek to develop and deliver their own inhouse programmes.
- Transition to a new system needs to be clear and well communicated.

Consultation Questions

Which of the two models – Independent or Collaborative work-based learning – does your organisation prefer?

We prefer Option B – the Independent model.

Why will your preferred model work best for employers and learners in work-based learning

The Independent model will provide the smoothest transition, and for both learners and employers it will provide greater continuity from the current model, reducing the risk of disengagement from both those groups.

For work-based learning it is important to ensure that the interface with employers and learners in the system remains easy to navigate with no additional barriers placed in the way of either of the two key parties – the learner and the employer.

Option B retains the work-based learning divisions currently hosted in TePukenga and maintains continuity as the system transitions.

What does your organisation think are the main benefits, costs and risks of each option for employers and learners in your industry?

The Consultation document provides little information about funding, and it is therefore not possible to provide comment on the costs for each of the options, but it is important that no additional unnecessary costs are incurred.

The document is also silent on the regulatory requirements for the transition of the WBL Division to becoming a private training establishment. We ask:

- (a) if the new bodies will be required to meet current NZQA PTE regulations; or
- (b) whether a new type of tertiary organisation will be established with different regulations than those existing.
- (c) who will own those entities?

As stated above, the Independent model should provide a smoother transition through yet another period of change that could disrupt employers and learners.

Option B provides a better pathway for training for niche industries who are a vital part of New Zealand's economic infrastructure, and whose training takes place on a national basis, rather than a regional one. While some of these niche industries have lower learner numbers, it is vital that the vocational education system recognises the importance of the skilled workers they generate and where they fit into the education and training ecosystem.

NZQA should not be the default backup for qualifications outside ISB coverage, as its core role isn't qualification development. Industry wants a less complex and more responsive VET system, assigning standard-setting to NZQA could create inconsistent service for industries and confusion about who is responsible for what.

PrintNZ do not support Option C as it adds a number of risks to for vocational education and training:

1. It introduces a further level of engagement – another visitor to a workplace, “car up the drive” - for learners and employers.
2. Without a solid definition of “pastoral care”, there could be a confusion of roles and responsibilities between the ISB and the provider, resulting in a reduction of service levels to the learner and employer as some of the pastoral care could get lost in the gap.
3. The separated pastoral care function could lead to an inconsistent approach which could cause confusion for all parties.
4. Duplication of resources and roles interacting with the learner and employer will almost certainly add costs in a system that is trying to do more with less.
5. Having multiple parties interacting with the learner and employer could potentially slow down the learner journey if their interactions do not align. This could cause unnecessary delays in the learner completing their journey and unnecessary additional costs.

Industries that are solely reliant on workplace learning do not want their work-based learning organisations dissolved, and do not want to move to the care of ITPs. Option C would not recognise or support qualifications that are delivered on a national basis.

Both models will involve a transition process but this will be different for each. What will be the critical factors in making transitions work for your industry?

The key critical factors for transition are:

1. Clarity in the communication of the new models to all involved in the system
2. No disruption to the learner journey – same content, same interactions, same outcomes
3. No disruption to employers – same process, same interactions, same outcomes
4. No additional costs to the employer either via direct charges or indirect compliance costs
5. Recognition in the new system of the substantial contribution that employers make to work-based learning.
6. No reduction in the functions and service levels that work-based learning currently has.

The transition required under Option B will best meet these requirements by being less disruptive for all parties. It also allows for a clear, stepped, progression for those industries that wish to establish PTEs. This option is also more likely to retain key staff across all stakeholders.

Additional Comments

Industry Standards Board

We are pleased to see that Industry Standards Boards will be established and funded to provide independent standard setting functions, quality assurance, strategic workforce analysis and provide investment advice to TEC. The link between the strategic workforce analysis and the investment advice is vital as the ISBs will be best placed to work directly with industry to understand future workforce needs.

Establishment of Industry Stakeholder Groups (ISGs) for all Industry Standards Boards

We recommend that the Order In Council for all ISBs includes the requirement to establish and maintain an Industry Stakeholder Group to ensure that the ISBs maintain a true connection to industry.

Print and packaging is covered under Hanga Aro Rau, the Workforce Development Council for Manufacturing, Engineering and Logistics. As part of their Order in Council, they were required to have an Industry Stakeholder Group which has been responsible for providing direct contact between industry and the Council of Hanga Aro Rau. I have had the privilege of being a member of the Stakeholder Group and seen first hand how effective it has been in providing an additional avenue of contact with industry.

One of the statements in the Consultation Document (P12) promoting the benefits of the Collaborative Model was that it will provide “a direct feedback loop from employers and apprentices/trainees to the standards-setting ISBs”.

This has been the exact operational focus of the ISG and we would recommend that all ISBs are mandated to have an ISG that would fulfil that feedback loop function mentioned above, without the requirement for pastoral care to be sectioned off and allocated to the ISBs.

The Hanga Aro Rau ISG is a robust group that are all industry nominated and have had the opportunity to guide the strategic direction of the WDC Council to ensure that it is indeed industry led. In addition they have been responsible for the appointment of Council member as vacancies come due and this has ensured the independence of this function from both internal and political influence.

There has been a further layer of nine National Industry Advisory Groups which provide focussed industry feedback by sector. These have also been valuable and could be developed at the discretion of the ISBs and Industry Stakeholder Group to further cement connections with industry.

Levies

PrintNZ does not support the introduction of training levies without substantial consultation and without this it should not be included in the proposed legislation that will be required to stand up the new system.

Career Pathways

The Consultation Document is silent on the provision of work on career pathways.

Industries' biggest challenge is the attraction, development and retention of their workforce. They need certainty that they will have access to a sustainable pipeline of talent, best supported from school into work and/or higher education.

The current system still does not enable clear and smooth transitions, nor allow for clear pathways, and can be complex to navigate for both employers and (prospective) learners.

It is essential that the role of vocational pathways advocacy is explicit in the functions of the Industry Skills Boards (ISBs) or made clear where that function resides, if it is not to be part of ISBs.

The overall goal is to improve awareness of industry career opportunities and work to improve vocational pathways from primary to secondary to tertiary. Industries that struggle to attract and recruit staff will benefit quickly, plus clarity will be provided to future learners.

Conclusion

The vocational education system must stay agile and forward-thinking to meet the changing needs of tomorrow's workforce. This includes adapting to new technologies, global economic shifts impacting local jobs, emerging fields like AI, renewable energy, and data science, and evolving workplace preferences, such as remote work and work-life balance.

The system needs to be able to respond more rapidly than it currently does to deliver new training qualifications and while this review may address part of this issue, without systemic changes at NZQA and TEC, this is unlikely to occur.

We reiterate, our preferred model is Option B – the Independent Model. However we need to ensure that any new model takes the following into consideration:

- Work-based learning needs to remain exactly that – learning that is undertaken in the workplace and supported by the vocational education system.
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- Transition to a new system needs to be clear and well communicated.

In addition to the views presented in this submission, I fully endorse the submissions made by the Industry Stakeholder Group of Hanga Aro Rau, Competenz and the Manufacturing Alliance.

I would welcome the opportunity to discuss this submission further.

Ngā mihi nui

A handwritten signature in black ink, appearing to read 'Ruth Cobb', with a stylized, cursive script.

Ruth Cobb

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