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Ministry of Education  
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Tēna koutou

## **RE: OPTIONS FOR THE FUTURE OF WORK-BASED LEARNING**

Thank you for the opportunity to contribute to the future of work-based learning. We acknowledge the extra consultation the Government is doing to ensure it gets industry input to all aspects of this reform. We also appreciate the willingness to amend proposals based on industry feedback, such as proposing to give Industry Skills Boards (ISBs) the ability now to provide advice to the Tertiary Education Commission.

### **Overview**

Engineering New Zealand appreciates the Government's commitment to strengthening the vocational education system. Engineering New Zealand is the largest professional body for engineers in New Zealand. We have both regulatory and membership roles, with over 23,000 members.

Engineering New Zealand is interested in maintaining the integrity of the vocational system. We want to ensure that nationally consistent high-quality training is developed to support and build the workforce of the future, and that the system leverages current expertise in the industry.

Our interests stem from both professional engineers being able to enter the workforce via work-based learning pathways plus the engineering profession and the wider industry depending on the vocational system to sustain the supply of many essential complementary disciplines.

We offer suggestions on two of your question areas, as follows -

1. Which model do we prefer – (We support Option B)
2. Factors to consider for the transition – (Refocusing/rebranding Workforce Development Councils to transition to ISBs and maintaining the standards setting role of VEE.NZ for vocational engineering education programmes)

## **Our preferred model of work-based learning**

### *Option B preferred*

Option B, the independent work-based learning model, is our preferred option. We are not in favour of Option C the collaborative work-based learning model, for several reasons, as follows.

Option B provides for a less complicated system and a more learner centred and industry led approach. It also places the responsibility for pastoral care and learner success with the education provider and the employer, which we consider is clearer and more appropriate.

Option C, the collaborative work-based learning model, introduces unnecessary complexity to a system without clear benefits, for instance:

- We understand there have been some concerns over the pastoral care of some learners under the existing model. We believe it would be more effective to strengthen existing relationships within Option B rather than introducing a third party (the ISBs) into the process. Additionally, clarifying the definition of pastoral care could be helpful, alongside exploring ways to encourage employers to take greater responsibility in this area. The reforms could look to organisations such as *MATES in Construction* to assist.
- In addition to the clear health, safety and wellbeing obligations that employers have for their staff, we do not believe that providers can or should meaningfully separate pastoral care from delivery, so ISBs would be undertaking this care “as well as” rather than “instead of” providers. We see this as adding cost and complexity.
- We are also concerned about how Option C proposes to address the work-based learning divisions of Te Pūkenga. We understand that the existing divisions of Te Pūkenga already operate independently, meaning a transition to standalone providers, as suggested for Option B, would be more straightforward with minimal disruption.

### *Vocational pathways*

The engineering profession needs a sustained and increased pipeline of talent, supported from school into work and/or higher education. Our last submission discussed our concerns over the long-term skills shortage in both engineering and the wider construction industry. The WDC role of advocating for and promoting vocational pathways is an important function and we are not clear whether this will sit in the functions of the Industry Skills Boards or elsewhere.

## **Transitioning to a new model**

There are a variety of implementation and transition risks to manage in this reform process, particularly with so many people and organisations affected. For instance, maintaining a high-quality service to learners and industry at the same time as driving cost efficiency and change always have its challenges. We offer two ideas that we consider will help achieve both the goals of the industry and Government.

### *Option B transition*

We wonder whether Option B could be achieved through a repositioning/rebranding of WDCs. ISBs are, we understand, now taking on most of the functions of the WDCs and only small adjustments would be needed to make the desired changes to the future roles and responsibilities.

The Government has signalled there would be 'up to eight ISBs.' We support having a small number of ISBs to retain efficiency and effectiveness and wonder whether six ISBs, like the six WDCs, is a viable option that could be explored. Given the nature and breadth of vocational education, some overlap between ISBs, is inevitable, and a perfect fit may not always be achievable. For instance, Engineering New Zealand effectively works with two WDCs currently.

Change processes are costly for both the Government and affected parties. We believe this transition approach would minimise the disruption while achieving the desired outcomes in a more cost-effective manner. A rebranding could ensure that these new entities are aligned with the intended objectives. This approach would support the Government's objectives of creating a financially viable system.

### *VEE.NZ*

We recommend the reforms leverage the expertise of the existing organisation [Vocational Engineering Education, New Zealand](#) (VEE.NZ), rather than recreating their function in the new system. NZQA recognises VEE.NZ as the industry standards-setting body for the Level 6 and 7 vocational engineering qualifications related to civil, mechanical, electrical and fire engineering. VEE.NZ's standards setting role is recognised by Waihanga Ara Rau and Hanga Ara Rau, with both organisations represented on the VEE.NZ Board.

These qualifications prepare graduates for work in a range of industries and span several current WDCs and likely multiple future ISBs. VEE.NZ's extensive network, which includes ITPs and PTEs across the whole of New Zealand, enables VEE.NZ to maintain a close relationship with the industry.

In our view, retaining the current VEE.NZ arrangements is the most effective and efficient approach to achieving your goals and ensuring a smooth transition for a group of engineering qualifications that are critically important to the engineering profession and NZ inc.

Beyond the immediate transition, we support the proposal that ISBs be able to charge providers for moderation and programme endorsement activities as this would ratify VEE.NZ's current funding model. However, VEE.NZ does not currently receive funding from other sources and future funding arrangements for the important standards setting function should enable a level of Government funding allocation to specialist bodies, such as VEE.NZ, which may operate under some form of delegation from an ISB or NZQA.



### **Summary and Next Steps**

Thank you for the opportunity to comment on the future direction of vocational reforms. Based on our assessment and discussion with many partner agencies - we consider Option B best supports the development of a vocational education system that meets the need of the engineering sector and contributes to the growth of New Zealand. We also consider that refocusing/rebranding WDCs as the transition approach to Option B and maintaining the role of VEE.NZ have merit.

We would be interested in being consulted on the design and implementation of the new system, including the number and scope of ISBs and the funding of the future system. If we can be of any assistance or provide further information, please do not hesitate to contact us.

Nāku, nā

**Dr Richard Templer**  
Chief Executive