CONCOVE TŪHURA

Final Report

The funding of Technical and Vocational Education and Training (TVET)

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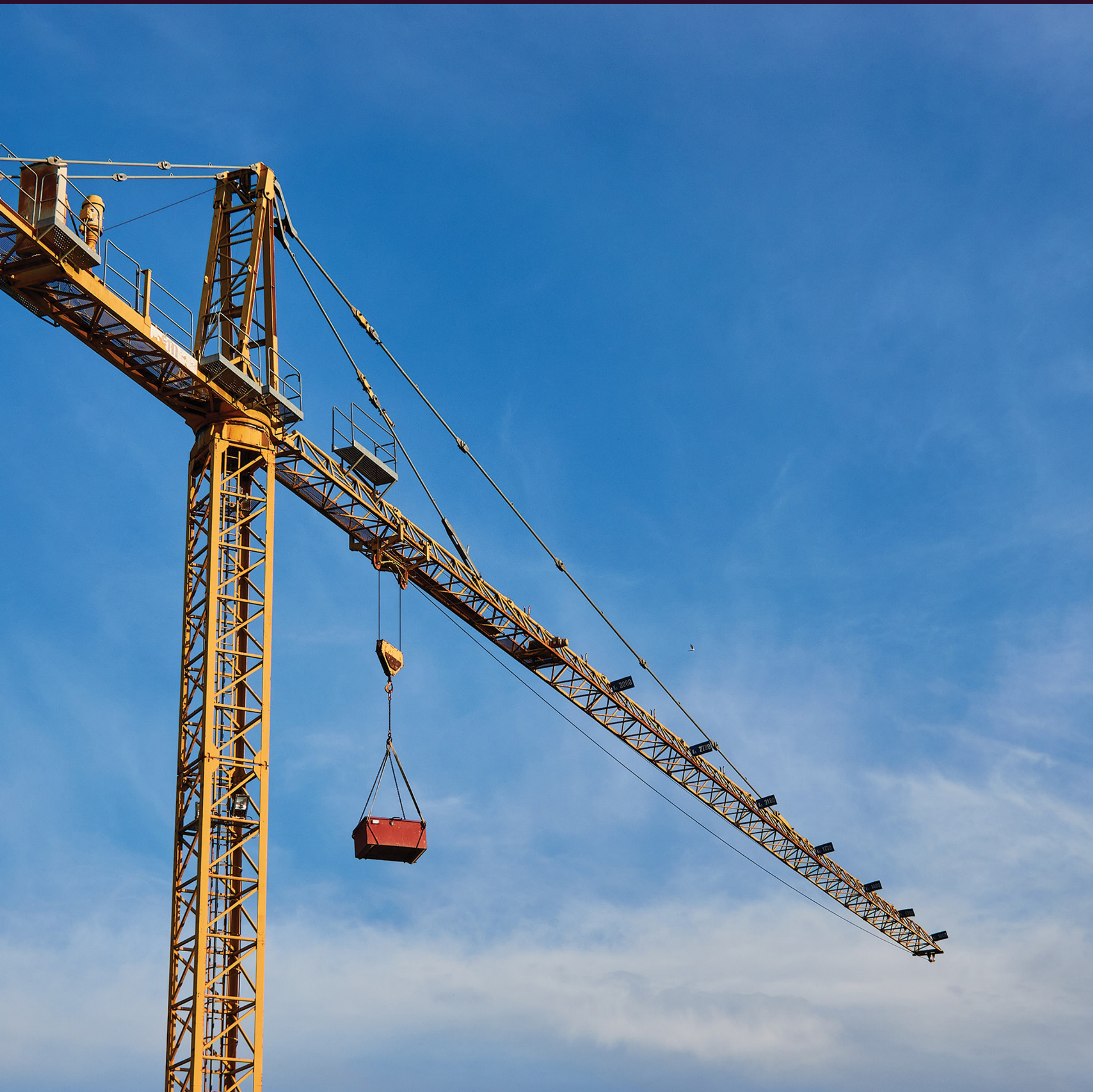

CONTENTS

1. PREFACE

This report is the final result of the exploration by the Construction and Infrastructure Centre of Vocational Excellence (ConCOVE Tūhura) into reforming the funding of vocational education in the construction and infrastructure sector.

It follows the publication of the Discussion Paper on the Funding of Vocational Education, which proposed five integrated funding changes aimed at creating a more equitable, responsive, and future-focused training system.

The purpose of this report is to test those five proposals against sector and expert feedback and to ensure that any recommended reforms reflect the practical realities, priorities, and concerns of those most affected by the funding system—employers, providers, learners, and workforce development bodies.

This engagement fits within a three-phase process:

- Background research, including literature review, data analysis, and over 50 key informant interviews.
- Development of the discussion paper, articulating five core proposals for funding reform.
- Sector engagement, comprising an open webinar, a targeted survey and follow-up interviews, which this report summarises and interprets.

This paper should be read in the context of the other outputs from the project, available here:

- A literature review.
- A summary of stakeholders' and experts' views.
- A commentary on equity and inequity in technical and vocational education and training (TVET) and implications for TVET funding of Te Tiriti o Waitangi.
- A full account of the methodology.

The analysis was drawn together in an executive summary and a discussion paper, which was featured in a webinar held on 11 June 2025. ConCOVE also invited stakeholders to comment on the five proposals in a survey.

This paper provides a consolidated account of the sector's response to the discussion paper, identifying where proposals were supported, where adjustments are needed, and what additional considerations have emerged.

The findings and recommendations presented here represent a funding model that better aligns educational outcomes with workforce needs, supports long-term investment in skills development, and promotes equity, particularly for Māori, Pacific peoples, women, and disabled learners within the vocational education system.

2. RECOMMENDATIONS

The final recommendations in this report are underpinned by a coherent policy logic articulated in the May 2025 Discussion Paper. We outline this policy logic below, taking into account the feedback we received.

Core elements

The discussion paper presents a systems-change framework for TVET funding in the construction and infrastructure sectors based on the following:

- Persistent skills mismatch and employer disengagement: While employers in the construction and infrastructure sectors benefit widely from a skilled workforce, employer disengagement is driven by structural barriers and policy design failures.
- The current funding model lacks incentives and flexibility to support meaningful, sustainable industry participation in training, particularly among small and medium-sized enterprises (SMEs).
- Workplace-based learning is undervalued and underfunded: The current system structurally favours enrolment-based metrics and campus-based delivery, sidelining employer-led, work-integrated models.
- Equity and completion failures are systemic: The report highlights that Māori, Pacific peoples, women and disabled learners are underrepresented and underserved due to fragmented learner support, inaccessible structures, and inequitable funding.
- A significant part of this challenge lies in entrenched mental models about who belongs in vocational education and how success is defined, yet there is little investment in shifting these mindsets across institutions, employers, and policy settings. Centralisation and short-termism undermine responsiveness: A centralised system governed by volume-driven allocations and over-regulation has stifled innovation, responsiveness to local workforce needs, and long-term planning. The system needs more certainty to thrive.

Based on the synthesis of survey responses, interview insights, and thematic analysis, this section presents a set of refined recommendations for enhancing the funding of vocational education in the construction and infrastructure sector. The recommendations recognise the strong support for system change, while also responding to the conditions and caveats raised by stakeholders regarding implementation, governance, and equity.

The following table is an updated version of the proposed improvements outlined in the discussion paper, incorporating the feedback received. Detailed recommendations in relation to each proposed change are also presented.

Table One: Improving the Funding System

The current state	Desired future state	Mechanism
The TVET system in construction and infrastructure cannot supply and retain enough qualified staff to meet the needs of employers. Many young people with skill and potential are lost to the industry because of the patchwork nature of the pathways and support for senior secondary students, apprentices and trainees.	The pathways for young people/ learners are more coherent. Learners are supported in decision-making through more straightforward, better aligned, and personalised pathways. Training organisations can recruit learners from all population groups and retain those learners to completion.	Change 1: Take a people-centred approach to learning support Funding used for apprenticeship and trainee support is directed to a network of navigators who deliver better-aligned, personalised and well-resourced pathways.
The funding system is poorly aligned with long-term regional construction and infrastructure needs and lacks flexibility because of an accumulation of rules and regulations that govern how funding can be used.	Decisions are made closer to where the most relevant information and capacity for implementation exist, ensuring better matching of skill needs and the supply of training, as well as greater efficiency, innovation, and flexibility in how those needs are met.	Change 2: Devolved decision-making National and regional planning for housing and infrastructure incorporates an explicit education and workforce planning component. The Construction and Infrastructure ISBs are given power to direct funding for relevant TVET (delivered by WBL, ITPs, PTEs, Wānanga, universities). TEOs have the flexibility to design training solutions that meet industry needs without overbearing regulatory regimes.
The investment plan system takes a short-term, risk-averse approach, which encourages TEOs to be conservative and limits their ability to maintain critical regional training capability through the economic cycle.	TEOs have security of funding, so they have the confidence to innovate and sustain their delivery capacity and capability through the economic cycle and cope better with short-term shocks, such as natural disasters.	Change 3: Strengthening the investment approach The government guarantees construction and infrastructure TVET funding levels for up to five years at high-performing TEOs. The government creates a more strategic, holistic framework to assess TEO performance at the end of the five years, looking at the value created, rather than simply counting the number of enrolments. Funding is based on value-added measures, not just enrolments.

Table One: Improving the Funding System (Continued)

The current state	Desired future state	Mechanism
The system lacks sufficient resources to understand the needs of industry and learners, rations what support is available and underinvests in employers' critical role in skill development. The result is mixed completion rates, particularly for demographic groups that will make up a larger share of the working age population in the future (Māori and Pacific) or are underrepresented in the construction and infrastructure workforce (women and disabled people).	There is adequate support for learners and employers engaged in training, the industry has a stronger voice in resource allocation, free rider issues have been reduced, and key system infrastructure around skills development has been maintained.	Change 4 – Increase work-based learner fees While the discussion paper proposed increasing learner fees, we recommend that alternatives be explored. Change 5: Introduce industry training levies Industry training levies should be introduced to support employer capacity to train and employer-directed innovation, with rebates for employers who actively contribute to education and training.

Recommendation 1: Adopt Change 1 – People-Centred Learning Support

Adopt the proposal to coordinate existing learner support funding to establish a national network of navigators. This will help learners and employees at risk find their way through the myriad transition and training programmes that lead to sustainable and satisfying employment and supports them through their career development. This network should:

- Be culturally responsive and grounded in whānau-centred and equity-informed practice;
- Include iwi, hapū, community-based organisations, social service providers, and professional bodies or industry associations as key delivery partners;
- Recognise that vocational learners are often also employees, and ensure navigators are equipped to work with employers, supervisors, and professional bodies;
- Operate under a shared outcomes framework co-developed with learners, tertiary education organisations (TEOs) and employers;
- Be funded through braided funding streams across education, employment, and social sectors to reflect the cross-sectoral nature of learner needs.

Implementation caveat: Governance and delivery of this model must avoid duplication and ensure navigators have clear mandates, resources, and community legitimacy. This model relies on targeting support to those in greatest need and the development of a capable navigator workforce.

Recommendation 2: Adopt Change 2 – Devolved Decision-Making (with phased implementation)

Adopt the principle of devolving funding and planning authority closer to regions and industries. However, implementation should be phased and accompanied by:

- Strengthened governance and capability support for industry skills boards (ISBs) and local and regional government, mana whenua and business groups;
- Formal roles for cross-regional mayoral fora and regional economic development agencies, including integration with City and Regional Deals and regional workforce strategies;
- Deeper formalisation of industry's leadership role, beyond current legislative proposals, including mechanisms for industry co-governance of planning and investment decisions;
- Account for the staged transition of the former work-based learning (WBL) divisions of Te Pūkenga to ISBs and subsequently as independent private training establishments (PTEs).

Implementation caveat: Avoid premature devolution where capability is lacking. Begin in selected regions that demonstrate strong local infrastructure, co-governance models, and workforce alignment.

Recommendation 3: Adopt Change 3 – Strengthened Investment Approach (with clearer performance metrics)

Adopt a shift toward five-year investment commitments for high-performing TEOs, but refine the definition of performance to include:

- Outcomes for learners and especially for priority learner groups;
- Responsiveness to regional workforce and industry needs;
- Innovation, co-design, and collaboration with employers and industry bodies;
- Employer and learner satisfaction and learner progression;
- Alignment with broader regional economic and social priorities.

Implementation caveat: It will be necessary for the government to develop metrics that reflect the concept of performance described above in partnership with the sector, iwi, and regional bodies. The new investment approach should be pursued in partnership with providers and regions to test feasibility and avoid unintended consequences.

There will also be a need to support the implementation of the new system with investment in data infrastructure and the capability to manage these more complex processes. The costs could be shared between government and industry (via the proposed levy).

Recommendation 4: Amend Change 4 – Increase Workplace-based Learner Fees

While it is clear that more resourcing is needed for learner support in workplace-based learning, the consensus of the feedback is not to adopt this change in its current form. Instead, we recommend testing alternative approaches, including:

- Employer-matched funding models;
- Tiered fee structures and targeted fee forgiveness mechanisms based on learner income or training intensity;
- Full integration with the Student Loan Scheme for any compulsory charges;
- Seeking additional resourcing for learning support for workplace-based learners. For instance, finding existing low-value tertiary education expenditure that could be reprioritised for this purpose. The funding for 'final years fees free' for learners enrolled in provider-based tertiary education could be redirected to apprenticeship

training to both extend the existing entitlement to those learners and increase the available resourcing for learner support.

Implementation caveat: If this recommendation is implemented in full or part, it will be essential to assess and monitor the impacts on learner access, participation, and completion before scaling.

Recommendation 5: Adopt Change 5 – Industry Training Levies (with robust governance and exemptions)

Adopt the proposal to introduce targeted industry training levies involving an increase to the building levy and new levies on infrastructure projects and migrant worker visas, with the following refinements:

- Use a tiered or threshold-based approach to avoid undue burden on small and micro businesses;
- Ringfence levy revenue for workforce development and programme innovation;
- Apply rebates or credits for employers who actively engage in training and workforce development;
- Establish mechanisms to enable ISBs to coordinate with industry, including iwi/Māori-owned businesses, to oversee allocation and outcomes.

Implementation caveat: It will be essential for levy revenue to be gathered through existing mechanisms (where they exist) and administered by ISBs on behalf of the industry, without being subject to full or partial retention by the government. Ensuring clear communications with employers about the purpose, use, and benefits of the levy will be necessary to maintain support and compliance.

Of particular importance will be making clear that the levy funding would be in addition to existing public subsidies for tertiary education, rather than a substitute that allows the government to reduce its investment.

Recommendation 6: Cross-Cutting Recommendation: Align Regulatory and Funding Reform

Across all changes, sector feedback strongly indicated that funding reform cannot be successful without accompanying regulatory reform, particularly around the New Zealand Qualifications Authority's (NZQA) programme approval, micro-credential stacking, and provider flexibility.

We recommend that:

- A review of regulatory settings in tertiary education is conducted, led by the Ministry of Regulation, supported by the ISBs and with input from the sector and government agencies, to support flexible, modular, and outcomes-focused vocational education;
- Establish a time-bound cross-agency implementation group to oversee this work.

Implementation caveat: System changes will need to be managed sensitively, given the level of change fatigue in the system, and any changes will require substantial potential benefits to be demonstrated before being introduced.

Recommendation 7: Adopt the following implementation approach

The recommendations outlined in this report must be implemented in a carefully staged manner.

The reforms are interconnected and rely on a combination of system readiness, regulatory reform, and capability building. We outline an implementation pathway over three stages, designed to build momentum, manage risk, and align system change with the needs of employers and learners.

Strategic Coherence and Implementation Logic

The five recommended funding reforms make up an integrated and interdependent package. Each change addresses a specific shortcoming in the current system, but none can succeed in isolation.

Stakeholder feedback, insights from international models, and the policy logic outlined in the discussion paper all support the view that the reforms should be implemented in a phased and co-ordinated manner to maximise their collective impact.

The interdependencies between the changes are described below:

- *Change 1 (Navigator network)* requires braided funding, local delivery authority, and long-term investment commitments to function sustainably. It relies on Change 2 (devolution) for governance, Change 4 (learner co-investment) and Change 5 (levies) for potential co-funding.
- *Change 2 (Devolved decision-making)* is a system enabler, providing the structural foundation for delivering more responsive, regionally aligned training. It is essential for embedding other reforms at the local level, particularly Changes 1, 3, and 5.
- *Change 3 (Strengthened investment)* is made feasible by the insights and governance established under Change 2 and is financially underpinned by the stable revenue that may be generated through Change 5 (levies). It also creates incentives for employers to support learner outcomes, including those enabled by Change 1.
- *Change 4 (Workplace-based learner fees)* is only viable within a broader co-investment ecosystem that includes employer support (Change 5) and learner guidance (Change 1).
- *Change 5 (Industry training levies)* provides the financial and governance infrastructure to resource new supports, sustain equity initiatives, and redistribute training costs more fairly. It is tied to Change 2 for governance, Change 3 for strategic investment, and complements Change 4 by providing a broader base of resourcing.

Each recommendation, therefore, plays a dual role: solving a specific design issue in the current system and enabling the implementation of other reforms. Treating them as modular or standalone risks undermining the system's coherence and the impact that stakeholders seek.

The reforms must also be sequenced in a way that reflects institutional readiness, regulatory constraints, and the need for iterative learning. Some changes (e.g. navigators and regulatory reform) can begin immediately. Others (such as levy implementation and multi-year investment agreements) require new governance structures, capability-building, and data infrastructure.

Starting in selected regions and sectors is a pragmatic way to learn what works and adjust system settings accordingly. This phased approach also reduces risk, builds trust, and avoids overwhelming the sector, which is still subject to ongoing reforms.

Table Two: Implementation Plan

Phase	Activities
Phase 1 (2026–2027): Laying the Foundations	Launch navigators in selected regions (Change 1), drawing on braided funding across education, employment, and social sectors. Initiate regulatory review and reform to enable more flexible delivery, faster programme approval, and reforms such as micro-credential stacking (Change 6). Establish a cross-agency implementation group, including government agencies, ISBs, iwi, and employers.
Phase 2 (2027–2028): Regional Rollout and Governance Shift	Implement devolved planning and investment models in 3–4 regions with strong iwi, employer, and local government partnerships (Change 2). Agree five-year investment agreements with selected high-performing providers (Change 3), using co-developed performance metrics. Design and test the industry training levy model in collaboration with industry partners (Change 5), including rebate mechanisms and SME protections. Continue capability development for ISBs, regional planning entities, and navigator providers.
Phase 3 (2028–2030): Scaling and System Integration	Trial co-investment models for workplace-based learners (Change 4), including targeted support for priority learners. Extend navigators, devolved planning and investment models and longer-term investment agreements (Changes 2 and 3). Implement the levy model. Embed revised regulatory settings, ensure alignment across quality assurance, funding, and programme design.

3. METHODOLOGY

This study employed a mixed-methods approach to gather and analyse feedback from stakeholders on the proposed changes outlined in the Discussion Paper. Two primary data collection tools were used: an online survey and a series of semi-structured interviews with key informants.

The survey was distributed through ConCOVE's networks and partner organisations, targeting a broad cross-section of stakeholders involved in vocational education, training, workforce planning, and industry leadership. The questionnaire consisted of five core sections corresponding to each of the proposed funding changes. Each section included a series of Likert-scale questions designed to capture the level of agreement or disagreement with the proposals, accompanied by open-ended comment boxes to enable respondents to elaborate on their views.

A total of 14 responses were received, representing a range of organisational types, including employers, industry groups, and organisations working in TVET, such as staff of TEOs, workforce development councils (WDCs), and TVET specialists. The responses were analysed quantitatively to generate descriptive statistics. We also split the respondents into two groups - an industry-focused group and an education-focused group - to examine whether there were differences between the two subgroups.

Qualitative data from the comment boxes were analysed thematically using an inductive coding process. Recurrent ideas were grouped into high-level themes to identify areas of support, concern, or suggested revision for each proposed change. The qualitative analysis also sought to capture emergent issues not anticipated in the original discussion paper.

To complement the survey findings and provide deeper contextual insight, a series of semi-structured interviews was conducted with stakeholders who indicated a preference for this approach. Notes from these interviews were coded to identify themes, points of alignment with survey data, and any areas of divergence.

We also reviewed a selection of other documents, including Cabinet papers and submissions to the Education and Workforce Select Committee, identifying comments relating to how TVET is funded.

In total, we gathered information from 18 groups and individuals. This complemented the 49 interviews we conducted in the first phase of the research.

Triangulation was applied by comparing findings across the quantitative survey responses, qualitative survey comments, and interview data. This approach allowed for a more robust interpretation of the results, reinforcing common themes while also identifying nuances and tensions within the sector's response. The combined data provided a rich evidence base to inform the final set of recommendations.

Limitations and Generalisability

This report builds on earlier engagement with 49 key informants during the development of the discussion paper. Those interviews provided a rich source of insight into the funding system from a range of perspectives, including TEO leaders, industry bodies, peak organisations, and government officials.

However, the follow-up phase of engagement, summarised in this report, was more limited in scale and scope. While the survey and interviews offered useful validation and critique of the proposed changes, the number of respondents was small and direct input from learners, small employers, and iwi governance entities was limited. These voices are essential for understanding how funding reforms will affect equity, local responsiveness, and employer behaviour at the margins of the system.

As a result, while the findings offer valuable direction, they should be interpreted with care and understood as indicative of sector sentiment in the construction and infrastructure sector, rather than fully representative of the broader industry.

Future phases of work, including any detailed policy design work, should prioritise deeper engagement to ensure design and implementation account fully for any differences that a broader engagement programme might have revealed.

Implementation detail

This report does not attempt to produce costings of the proposed changes. Instead, it focuses on identifying areas of broad stakeholder alignment, areas of caution or divergence, and the conditions under which changes could be tested or scaled.

The emphasis is on the direction of change, the rationale for reform, and the practical design considerations that emerged from stakeholder input.

Implementation details, including costings, more detailed sequencing, and risk management, would be undertaken as part of subsequent phases, ideally in partnership with delivery agencies, industry bodies, iwi, and providers as part of a structured implementation process.

4. BUILDING ON PREVIOUS WORK

This paper builds on a comprehensive set of preparatory work that informed the discussion paper, including:

- *The funding of TVET – Literature Review*
- *Commentary on Equity and Inequity*
- *Te Tiriti o Waitangi – Implications for TVET funding*
- *Key informants – Stakeholder views about TVET funding.*

We have summarised the key points from those papers below.

Literature review

This section summarises the more comprehensive literature review in the companion report, *The funding of TVET – Literature Review.*

TVET delivers strong economic and social returns—enhancing employability, productivity, and inclusion, particularly in the construction and infrastructure sectors, yet outcomes are constrained by funding misalignments, weak outcome measurement, and under-investment in work-integrated learning (WIL). This review explores both benefits and costs, highlighting funding, access, and policy as key levers—framed within Te Tiriti o Waitangi.

TVET links education to employment, evolving from traditional apprenticeships to diverse, industry-aligned qualifications (Cedefop 2025; UNESCO-UNEVOC 2025; OECD 2024; Anderson 2009). In Aotearoa New Zealand, it spans vocational degrees, apprenticeships, and short training, though policy settings still reinforce outdated divides between 'academic' and 'vocational' tracks (Stratton & Mannix 2005; Geschwind & Boström 2020; Cedefop 2015).

TVET delivers both private and public value: improved earnings, lower unemployment, and stronger civic and health outcomes (Hűfner 2003; Russo et al. 2013; Cedefop 2011b, 2011c; Vaughan 2017). Level 4 qualifications offer especially strong returns for job security and asset growth, though wage gains may flatten over time (Crichton 2009; Pacheco et al. 2023; Hanushek et al. 2017; Wößmann 2019).

Employers gain from higher productivity and retention but are often deterred by risks (Crook et al. 2011; NZIOB 2021; Kao 1998). WIL improves learner confidence, job readiness, and graduate outcomes (Evesson et al. 2009; Jackson 2014; Finnie & Miyairi 2017), but employers face hidden costs such as mentoring, productivity loss, and off-job training (Kao 1998; Jones 2023; Alkema 2016; Eichhorst et al. 2021). Learners also absorb costs—fees, lost income, and low trainee wages.

Government support includes funding schemes such as Māori and Pasifika Trades Training (MPTT) and Apprenticeship Boost (Squires et al. 2015; James Relly & Laczik 2022), yet WIL remains underfunded in most sectors (Jackson 2013; Smyth 2024; McNamara 2014). Funding design must reflect both market and non-market returns to avoid systemic under-investment (Glomm et al. 2011; Friedman 1982).

New Zealand's decentralised funding model engages employers, providers, government, and training advisors. In contrast, Northern European models are more centralised, offering greater investment, living-cost support, and employer contributions via levies (Cedefop n.d.; UNESCO 2022). Germany's system is reinforced by strong norms and institutional backing (Cedefop 2024; Deissinger et al. 2011; Li & Pilz 2023). Australia uses levy-funded schemes to target priority groups and widen access.

Despite 9,800 completions annually in construction and infrastructure, skill shortages persist, compounded by low completion rates and under-representation of Māori, Pacific peoples, women and older learners (Waihanga Ara Rau 2024; MBIE 2023; Farrell et al. 2016; Smart 2018; Pacheco et al. 2023; MartinJenkins 2025).

There is evidence to suggest that devolved decision-making and an investment-based approach can improve the matching of supply and demand for skills. Models such as regional deals between central and local government (HM Government 2011; Barca 2012), City Deals in Manchester (UK) and Townsville (Australia) demonstrate how devolved governance and skills budgets can strengthen links between education, industry, and regional development (Cabinet Office 2012; Infrastructure Australia 2016; Simpson Grierson 2024).

Commentary on equity and inequity

This paper examines structural disparities in New Zealand's TVET system, with a focus on the construction and infrastructure sectors. Despite formal neutrality, current funding and delivery models often perpetuate inequity by failing to adequately support underserved learners—particularly Māori, Pacific peoples, women and disabled learners, and those from low socio-economic backgrounds (Meehan, 2017; Earle, 2018; Waihanga Ara Rau and Hanga-Aro-Rau, 2023).

These learners face persistent barriers to access, retention, and completion, driven by factors such as financial hardship, inflexible programme structures, under-resourced support services, and exclusionary workplace environments (Coolbear, 2012; McGirr and Earle, 2019). Gender and ethnic disparities are evident in enrolment and achievement patterns (MBIE, 2023; Stats NZ, 2025a), while disabled learners encounter inaccessible training environments, stigma, and systemic ableism (All is for All, 2024; Te Pūkenga, 2021a).

Policies that prioritise short-term job placement over long-term skill development often result in learners cycling through low-paid, insecure employment rather than progressing into sustainable careers (McGirr and Earle, 2019).

To address these issues, the paper advocates for embedding universal design and inclusive pedagogy across all aspects of TVET. Universal Design for Learning (UDL) promotes proactive planning to accommodate learner diversity from the outset, offering flexible modes of engagement, representation, and assessment (Bong and Chen, 2021; Staring et al., 2022).

Inclusive teaching practices—such as culturally responsive pedagogy, peer support networks, and recognition of prior learning—can foster belonging and increase retention among equity groups (Gay, 2018; Bishop, 2009; Taffard, 2022).

The use of assistive technologies, flexible learning pathways, and learner-centred assessment design are highlighted as essential tools to remove systemic barriers (Fernández-Batanero, 2022; WHO, 2022; Yenduri, 2023). Critically, the paper argues for a deliberate shift in policy and practice to create a TVET system that normalises equity, rather than treating it as an afterthought (Rose, 2006; UoA, 2025).

Te Tiriti o Waitangi

This paper examines the implications of Te Tiriti o Waitangi for the design of New Zealand's TVET funding system, with a focus on construction and infrastructure. It explores how the Treaty principles of partnership, active protection, equity (ōritetanga), and redress should shape TVET funding policy and practice (Cabinet Office, 2019; Education and Training Act, 2020; Public Service Act, 2020).

Initiatives such as the Māori Trades and Training Fund (MTTF), Apprenticeship Boost, and the Unified Funding System (UFS) have increased Māori participation (Hipkins, 2021; MoE, 2025a). However, disparities in completion rates, limited progression into higher-skilled roles, and a lack of culturally responsive support persist (TEC, 2025; Kerehoma et al., 2013; Ihimaera Smiler, 2023).

While Māori are overrepresented in entry-level construction training, they remain underrepresented in higher qualifications and leadership roles (MBIE, 2024a; Stats NZ, 2025). The paper highlights that system-wide funding mechanisms often fail to reflect kaupapa Māori approaches and that Māori voices are still mostly advisory, rather than having authority over investment decisions (Laing, 2019; Quinn, 2022).

The report calls for a shift from consultative roles to genuine co-governance in funding policy and allocation. It critiques the standardised nature of UFS and earlier models that disadvantage kaupapa Māori initiatives through funding formulas that do not recognise costs related to marae-based delivery, elder support, or holistic learner needs (Ministry of Education, 2021; Waihanga Ara Rau, 2024).

While models like MPTT have demonstrated success through culturally tailored mentoring and governance, they are generally restricted to pre-trades levels and lack long-term continuity (MartinJenkins, 2017; Skills Active, 2024). The report argues that funding systems should be reoriented to support Māori concepts of success, including community capacity-building and cultural preservation, not just individual employment outcomes (Durie, 2005; Taumata Aronui, 2022).

Achieving this requires embedding Māori decision-making authority, ensuring funding accountability, resourcing Māori-led delivery, and addressing workplace bias and discrimination (Crown Law, 2017; Te Pūkenga, 2023). Without these changes, the system risks continuing to "fix Māori to fit the system, rather than fix the system so everybody fits" (Appendix D).

Key informants

This paper presents findings from interviews with 49 key informants across the construction and infrastructure sectors, including employers, providers, officials, and community leaders. A consistent theme was the tension between system stability and the pressing need for reform. Stakeholders expressed widespread fatigue due to ongoing structural changes since RoVE (Reform of Vocational Education), alongside a common view that the current TVET system does not meet the needs of learners, employers, or the economy.

Interviewees reported that funding mechanisms often prioritise enrolment over outcomes and fail to align with workforce needs. Many noted that regulatory frameworks, such as NZQA's qualifications system, are too slow to adapt to industry change. Participants also emphasised that the system still structurally disadvantages Māori, Pacific peoples, women, and disabled learners by imposing one-size-fits-all models and underfunding wraparound and culturally responsive support.

To address these issues, interviewees called for a funding system that balances learner, employer, and provider needs; incentivises industry engagement; and supports inclusive, flexible training delivery. Participants recommended recognising prior learning, embedding WBL, and investing in universal design to support diverse learners.

Strong support emerged for an industry training levy to address "free-riding" and redistribute training costs fairly—though concerns about design and small firm impacts were noted. Many stakeholders stressed the need for long-term funding certainty, innovation funding, and regional workforce alignment.

The key informants underscored the importance of learner-centred, equity-driven, and industry-informed funding reform to ensure the system delivers better outcomes and supports New Zealand's infrastructure and productivity goals.

5. ADDITIONAL EVIDENCE

Since the discussion paper was released, we have reviewed several additional papers and documents, including submissions to the Parliamentary Select Committee considering the Education and Training (Vocational Education and Training System) Amendment Bill.

The key points from these sources of relevance to this paper were:

People-centred learning support

- A Ministry of Education review of literature on the effectiveness and design of foundation/ transition programmes concluded that one of the characteristics of successful programmes is the provision of individualised mentoring (McGirr and Earle, 2019), but the majority of the programmes in New Zealand's current patchwork of transitions programmes lack individualised navigation and mentoring.
- A recent report argued for greater investment in connecting employers and job seekers with a focus on holistic support (IDEA, 2025), and a useful example of a navigation service that reframed the outcomes expected of the tertiary education system away from those directly tied to government funding (Studdart, 2019).

Devolved decision-making rights

- There are calls for industry to be involved in the design of funding models (MoE, 2025). More generally, a number of submissions to the Select Committee (for instance, from Business New Zealand and from some industry groups[1]) questioned whether the balance of decision-making rights was slanted too heavily in favour of government agencies and away from industry (Business New Zealand, 2025).
- One consequence of the lack of industry control/influence over training provision and regulation is the trend in recent years of companies choosing online, offshore or uncredentialed training that better meets their needs (Business New Zealand, 2025).

Strengthening the investment/funding system

- The government recognised in March 2025 that some provision is strategically important and requires additional financial support, even if it is not financially sustainable for individual TEOs under the current settings[2].
- There are concerns about the possibility that reduced funding for workplace-based learning would lead to increased costs for employers, risks that training for industries with a small number of apprentices and trainees would reduce or end, and the need for certainty about funding levels and models (MoE, 2025).
- Providers of vocational education have struggled to operate sustainably under fluctuating enrolments and funding models that are driven by compliance with funding and qualifications rather than meaningful learning and outcomes (Business New Zealand, 2025).
- Reduced funding for underserved learners reduces incentives for TEOs to enrol such learners and their ability to support them once enrolled (Te Pūkenga, 2025).

[1] Submissions from organisations representing the Construction and Infrastructure professions such as Civil Contractors of New Zealand, Master Plumbers and Master Electricians.
[2] Simmonds, P. 2025. Redesigned Vocational Education and Training System: Funding Settings. Cabinet paper. New Zealand Government. URL: Cabinet paper - VET funding- March 2025. Accessed: 22 July 2025.

- The current funding model is simplistic with ‘no ability to adjust price based on scale’ and does not accurately reflect the real costs of delivering education, encourage collaboration or helping learners succeed, particularly in remote locations, where there is poor infrastructure, weak earlier education and social and economic disadvantages (Te Pūkenga, 2025).
- The financial position of polytechnics and the changes required to reach a more financially sustainable position have been estimated as involving the closure of 550 programmes, up to 900 FTE staff and approximately 30 delivery sites[3].
- That point was reiterated in a number of industry groups’ submissions[4] to the Select Committee that determining funding on the basis of enrolment volumes can threaten the viability of provision that has high national value but typically has a small number of enrolments (also known as ‘low volume’ provision).

Employers’ training costs/ a workplace-based learner fee

- Analysis of the training advisory function in workplace-based learning shows that there is a need to strengthen learning support (Allen and Clarke, 2020).
- There is acknowledgement that while the private returns of training are substantial, without government intervention in the market through funding, regulation of qualifications, and public institutions to provide training, the external benefits of transferrable skill acquisition are less likely to be produced (MoE, 2025a).
- Employers invest significant time and resources into apprenticeship training, with one estimate valuing the cost of their commitment at $10,000- $50,000 per apprentice. Opportunity costs are the largest component (88%) associated with time spent on pastoral care (17 hours per month on average) and engagement with training activities (4.8 hours per month for supervisors on average)[5].

A training levy

- The successful implementation of levies is dependent on strong industry buy-in underpinned by a strong culture of training and lower overall costs of training and flexible rules for their use (Business New Zealand, 2025). Levies should only be introduced to deal with the ‘free rider’ problem and not compensate for a lack of government funding (MoE, 2025).

Other issues

- There is a need for workforce development planning and policy to be informed by infrastructure investment and asset management plans and the New Zealand Infrastructure Commission’s independent view of long-term needs (Infrastructure Commission, 2025).
- Opportunities exist to lift engagement and ensure that training and recruitment pipelines are accessible (Infrastructure Commission, 2025).
- There should be more emphasis on providing certainty of vocational education and training even where this comes at the expense of flexibility, given the extended period of structural change experienced by the sector (Treasury, 2025).

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[3] (Simmonds, 2025)
[4] This was particularly the case in submissions from groups in the Food and Fibre sectors. See for instance, submissions by Federated Farmers, Muka Tangata, NZ Pork and others
[5] Based on a survey of 317 employers. See Scarlatti (2025). Employer contributions to apprenticeships. Findings report for ConCOVE and BCITO. URL: https://scarlatti.co.nz/concove-bcito-employer-contributions-to-apprentice-support-report/. See also Jones (2023)

6. SURVEY FINDINGS

The survey instrument was structured around the five proposed funding changes outlined in the discussion paper, beginning with overarching questions on problem definition and the appropriateness of the proposed solutions.

Each change was assessed through a series of Likert-scale questions, supplemented by open comment fields to gather qualitative feedback. This section summarises the overall quantitative trends and synthesises the major themes that emerged from the comment boxes.

Quantitative Analysis

Respondents were invited to express their level of agreement with each proposition using a five-point Likert scale: Strongly Disagree, Disagree, Neutral, Agree, and Strongly Agree. Overall, there was broad support for most of the proposed changes, with the strongest endorsement for Changes 1, 2, and 5.

Figure 1 (in Appendix 1) presents the distribution of responses across each change area. Key results include:

- **Problem Definition:** Around a third of respondents agreed or strongly agreed that the discussion paper correctly identified the key issues with vocational education funding in the sector, with a further 55% giving a qualified endorsement (with some respondents arguing that the statement should have made explicit reference to matters such as the influence on training of the business cycle, the effects of the government's regulatory system and the pressures faced by employers).
- **Proposed Solutions:** There was a similar response to the proposed solutions. Around 35% gave unqualified support and a further 55% gave qualified support, expressing reservations about some aspects of the proposals.
- **Change 1 – People-Centred Support:** 57% agreed or strongly agreed with the proposal to establish a navigator network.
- **Change 2 – Devolved Decision-Making:** Support ranged from 57% to 93% across the three statements related to planning, ISB authority, and regulatory flexibility.
- **Change 3 – Strengthened Investment Approach:** 93% of respondents supported long-term funding certainty and a shift toward value-based investment criteria.
- **Change 4 – Increased Workplace-based Learner Fees:** This was the most contested change. Only 36% supported the full package of fee changes; an equal number expressed disagreement, with many caveats noted in the qualitative responses.
- **Change 5 – Industry Training Levies:** 71% supported the introduction of industry levies tied to construction and infrastructure activity and migrant workforce recruitment, particularly when combined with a rebate mechanism.

Thematic Analysis of Comment Fields

Problem Definition and Solutions

Most respondents were supportive of aspects of problem framing, but a common view was that one or more important aspects had been undervalued or underweighted. An example was the comment *"I think that some of the key issues have been identified, but I suspect that there are also some undisclosed issues".*

There was considerable variety in the areas where more attention was thought to be required, and the perspectives were sometimes contradictory. Those who were critical of the approach taken and the solutions identified each identified one or more areas where further analysis or different solutions might be warranted.

Areas where respondents thought the analysis could have been strengthened ranged from the emphasis on workplace-based learning (variously considered to be too great and too little), the impact of quality assurance settings, incentives and cultural issues in the industry and among learners, a lack of tailored solutions and a lack of appreciation of economic factors.

There were also mixed views about the solutions posed. Many were supportive but tended to emphasise one or more specific aspects: *"The continuity of funding for tauira and providers resolves a number of issues that exist in the current system".*

Respondents also generally considered that alternative solutions had not been presented, often relating to their view of the problem definition. These areas included the development of employer capability to train, the possibility of different incentive regimes or more decision-making power for industry.

Change 1 – People-Centred Learning Support

There were mixed views about the navigator model. Several respondents were very supportive: *"The proposal for a navigator is a great concept"*, but some thought that the scope of navigators should extend beyond tertiary education and training, i.e. either into secondary education or during their initial period of employment.

Some thought that the focus of a people-centred approach should be on developing employer capability: *"What if they could also support employers to learn how to train?"*

Others were unsure about the model because it lacked implementation detail and might duplicate existing arrangements.

"We would need to see far more definition about who or what 'navigators' are … [otherwise]… the apprenticeship pathway could be further destabilised".

Change 2 – Devolved Decision-Making

Respondents generally supported taking a regional view of investment, *"It would be ridiculous to do anything else" and "I think this is a great concept and should be how the system works now".*

Several had suggestions about how to extend the approach with different kinds of evidence, indicating an interest in exploring the model's implementation details.

The proposal to give ISBs the power to determine funding allocations was supported by some but there were a range of concerns relating to accountability, *"How will the allocations be held accountable and who will the ISBs be accountable to on this basis?" and feasibility, "A partnership would be ideal – but is that possible?"*

There was a variety of views about proposals for a regulatory review. Those that favoured such a review noted that current regulations impacted their ability to meet stakeholder needs: *"We struggle to design learning that ticks the regulatory boxes but addresses learner and industry needs in a responsive and timely way".*

Others tended to place more emphasis on national consistency:

"Qualifications across the sector require consistency, we would be concerned this could be lost if TEOs drove this without a nationally consistent approach".

Change 3 – Strengthening the Investment Approach

The majority of respondents welcomed the proposal for five-year funding certainty for high-performing providers, with advantages cited including scope to innovate and the opportunity to reward performance.

“Stability in funding allows commitment to economic outcomes. I believe it is a strategic move”.

However, there was a call for clearer criteria around what constitutes “high performance”, and some concern that the approach might reduce responsiveness and flexibility.

One respondent expressed concern that the proposal presented an incomplete picture, lacking appreciation of the value of workplace-based learning that was not credentialised through the NZQA-led system. *“The paper misses the point that a lot of fit for purpose training programmes are delivered outside of the education sector, solely as employer-funded training”.*

There was strong support for the proposal that funding follows labour and skill requirements rather than enrolments: *“An integrated approach is certainly needed”, and “Totally agree, funding needs to be more specific and directed to where it is needed”.*

A minority were concerned about the possible loss of accountability and the challenge of designing such a system: *“These claims are easy to make but difficult to deliver and substantiate”.*

Change 4 – Increase Workplace-based Learner Fees

This change attracted the most resistance and conditional support. Most acknowledged the need for improved support for workplace-based learners and the need for adequate resourcing but many worried about the impact on learner access.

“Increasing fees only if the loan scheme supports this; otherwise we will see exclusion from low-income families who cannot fund or support training costs”.

Others questioned the need and appropriateness of charging more: *“Charging more for ‘student services’ again penalises an employer who … is largely the trainer as well...”* and were concerned about the impact on enrolments: *“The spike in enrolments during TTAF showed clearly how people step forward when there is no cost barrier”.*

Change 5 – Introduce Industry Training Levies

There was widespread support for the concept of industry training levies, with particular value seen in the ability to invest in developing employer capability.

“The levies … should be invested back into the industry to train employers, mentors, assessors, navigators etc, to ensure there is better support for learners in the workplace where they complete their programmes and are retained within the industry”.

There were some concerns about the potential complexity of their design and implementation, and the impacts on SMEs *“…it should aim to genuinely encourage broader industry participation and support, particularly from the majority of smaller firms who are critical to our sectors’ future”.*

Some were concerned, however, that levies reinforce inequities in society and underplayed the already significant investment that employers make in training: *“Industry employers will not accept compulsory levies when they already pay the majority of the costs”, with one respondent objecting that a levy “… is just another tax on employers”.*

7. INTERVIEWS AND OTHER SUBMISSIONS

We conducted a small number of additional semi-structured interviews, in which we sought comment on and critique of the five changes proposed in this project. We also received email responses to the discussion paper. Insights from these sources added depth to the survey results and allowed for exploration of issues that may not be easily captured in survey responses.

General Alignment with Survey Themes

Interviewees largely affirmed the core diagnosis set out in the discussion paper: that the current funding system is fragmented, short-term, and misaligned with the needs of learners, employers, and regions. Several noted that the timing of this work was "critical," given the financial stress on providers and workforce shortages across the sector.

There was also strong endorsement of the overarching principle that funding models must become more equitable and responsive to diverse learners and local labour market conditions. As one interviewee observed:

"The real question is how to design a funding system that reflects both the public good of training and the real costs of delivery, particularly for learners who face multiple barriers".

Change 1 – People-Centred Learning Support

Support for the proposed navigator model was widespread. Many interviewees drew on their own institutional experiences with similar roles, emphasising the importance of trusted relationships, cultural competencies, and wraparound support.

Some of the programmes that aim to help young people at risk fail to deliver the longer-term outcomes needed. A network of navigators would create an opportunity to direct learners to programmes that meet their needs, and help them onto a pathway to training that will deliver sustainable careers.

"It's not just about guidance — it's about having someone who understands the learner's world and can walk alongside them".

Concerns focused not on the concept, but on resourcing, consistency, governance and whether the system had the capability to support this network at the scale needed. Some respondents asked how practical it would be to scale up a navigator network. Others noted that it would be important to target the support carefully to those who need it most and to the needs of the learners. For one respondent, the proposal raised the question whether *"… the system has got … the money to support that kind of approach…"*

Some called for iwi or community-based organisations to lead navigator services rather than placing them within TEOs.

Change 2 – Devolved Decision-Making

There was near-universal agreement that funding and planning decisions need to move closer to where workforce needs are and delivery happens, and for industry to have greater decision-making powers. The subsidiarity principle was seen as both practical and empowering.

“We need a system that listens to regions and lets them lead — not one where everything is routed through Wellington”.

Complementing the support for devolution to regions was the view that the balance of decision-making power is too heavily loaded in favour of government agencies at the expense of industry. That reflects the view that the system should have a greater focus on employers as the “customer” of vocational training, whereas government education agencies will typically aim to protect the interests of learners and manage risks to government, with the needs of industry a subordinate consideration.

Industry groups argue that they have a better appreciation than government agencies of emerging technologies and trends that shape employers’ needs. Industry should have the *“opportunity to contribute to … settings”.*

However, several interviewees highlighted the need for safeguards, particularly around the potential duplication with existing planning mechanisms. Others raised concerns about capacity:

“Devolving power is great — but who’s ready to take it? Not every region has the infrastructure to hit the ground running”.

One respondent noted that government rhetoric during the current reforms has been focused on restoring “local decision making” but that the current Bill doesn’t alter the main decision-making levers, i.e., that the powers to set price, quality and volume will remain with the government, and the amended Bill appears to grant the new ISBs a lower level of influence over the Tertiary Education Commission (TEC) funding decisions than the WDCs enjoyed. That suggests that the government is unlikely to relinquish its decision-making rights.

Change 3 – Strengthening the Investment Approach

Nearly all stakeholders supported the shift toward longer-term, value-based investment models. Providers particularly welcomed the idea of multi-year funding certainty to support innovation, risk-taking, and retention of specialised capability.

“Funding stability is what gives you the headroom to do the hard stuff — equity, innovation, local partnerships”.

One respondent pointed out that the term “investment” implies taking a strategic and long-term view of the value that funding will create, whereas, in practice, funding has been determined annually. There is a case for some annual funding at the margins but core funding should have a longer time horizon and should take a more comprehensive view of the “value” delivered by funding – rather than just enrolment volume.

A small number of interviewees urged caution, warning that guaranteed funding could reduce accountability if not linked to clear outcome metrics.

Respondents from the sector also recognised the need for "guardrails" to protect the integrity of the government's investment, but they argued that such guardrails do not necessarily require total control.

Change 4 – Increase Workplace-based Learner Fees

This proposal generated the greatest variation in views. Most acknowledged the need for improved learner support, but most were sceptical of shifting the cost burden onto learners without wider systemic reform.

"You can't ask an apprentice on minimum wage to pay for what the system should already be providing".

There was recognition that learning support for trainees in the workplace is patchy and often inadequate, but some respondents disagreed with charging learners to fix the problem. Some argued that it's not the volume of resourcing that is the source of the problem; rather, it is how well the existing resource is allocated and spent.

Recognising that current expenditure on the fees-free scheme in higher education is of very low value, one respondent argued that one way to provide additional funding for learner support in workplace-based training is to cancel the current higher education fees-free scheme. *"I favour removing the fees-free year for university study and using the savings to fund fully fees-free programmes for apprentices. Bearing in mind that 30% of school leavers go to university and only 6% into apprenticeships, that should be possible, with money to spare".*

Several respondents offered cautious support for the proposed change, suggesting testing the changes with full transparency around outcomes and completions and a focus on equity impacts before broader rollout.

One respondent noted that those undertaking managed apprenticeships through institutes of technology and polytechnics (ITPs) already face fees and may pay those fees by borrowing through the loan scheme, and hence, this change would put those in workplace-led training on the same footing.

Change 5 – Industry Training Levies

Interviewees across sectors, particularly those from large employers and peak bodies, generally supported the introduction of an industry levy as a mechanism to address the "free-rider" problem. Many noted that similar models work well internationally, provided governance is transparent and revenue is reinvested in ways that deliver clear value for the training system.

"If I'm paying into a levy, I want to see that money come back as real capability — not just another layer of admin".

One respondent noted that the extent of the free-rider problem may be overstated; that person argued that if we include sole-traders and very small businesses in the analysis, the percentage of firms that train will look very small, but if we confine our view to medium-sized/large companies, we see that the majority of firms in construction do engage in training.

Smaller employers and those in subcontracting chains were cautious about levies, raising concerns about compliance costs and cash flow.

The proposed rebate mechanism (that discounts a levy for companies that engage in training) was seen as essential to fairness and uptake.

However, one respondent noted that the mechanism proposed in the discussion paper for the construction industry (essentially increasing the existing building levy rate) means that the levy cost will be passed on to the builder's client. Viewed through that lens, the levy would reduce the strength of the incentive to train, but would distribute the costs of the levy more broadly.

8. INSIGHTS

This section draws together the findings from the survey and interview components of the engagement process. It identifies areas of strong alignment across stakeholder groups, points of caution or tension, and areas where feedback suggests the original recommendations in the discussion paper may require refinement or further development.

8.1 Areas of Strong Alignment

Consensus on system problems

There was broad agreement that the current funding system for TVET is fragmented, reactive, and poorly aligned with workforce and learner needs. Respondents consistently supported the discussion paper's framing of the problem, particularly its focus on:

- Short-termism in funding allocations;
- Inadequate recognition in the funding allocation of TEO performance in creating value for New Zealand, for learners and industry, beyond enrolment volumes;
- Inadequate support for underserved learners;
- Poor responsiveness to the needs of industry and employers;
- Lack of incentives for industry participation in training;
- Underinvestment in work-integrated learning.

These findings indicate that there is strong sector appetite for a redesigned funding model that is industry-led, strategic, equity-oriented, and outcomes-focused. Stakeholders are calling for a system that rewards high-quality, work-integrated provision, enables deeper industry engagement and leadership in training, and provides stable, long-term investment in capability development, particularly for underserved learners and sectors facing skills shortages.

Support for holistic, people-centred support

Change 1 (the introduction of a dedicated, culturally competent navigator network) received near-universal support.

Both survey and interview participants endorsed the shift toward more co-ordinated, learner-centred support, particularly for Māori, Pacific peoples, women and disabled learners. The Enabling Good Lives and Whānau Ora frameworks were repeatedly cited as appropriate models.

These findings suggest strong consensus around the need for a holistic, culturally grounded support system that recognises learners as whole people, embedded in whānau and communities.

Participants emphasised that effective support must include the individualised mentoring that is missing in most current transitions programmes; it needs to go beyond academic advising to include pastoral care, career guidance, mental health services, and proactive outreach delivered by trusted, culturally competent navigators who can build enduring relationships and navigate system complexity on behalf of learners.

We think that means navigators should be positioned to act first and foremost in the interests of learners, while also recognising that learners in vocational and work-based settings are employees as well as students. This dual status brings additional complexity, requiring navigation across education, employment, and regulatory systems. In our view, navigators must be equipped to work with employers, supervisors, and professional bodies, as well as with education providers.

Professional bodies and industry organisations have a critical role to play in shaping how the navigator network operates. Their involvement is essential to ensure that navigators understand industry-specific contexts, regulatory requirements, and professional progression pathways. Strong partnerships between TEOs, employers, and industry groups will be key to aligning support with real-world expectations and ensuring learners are well prepared for both study and work.

We also think there is a case for exploring different delivery models. In some contexts, it may be most effective for navigators to be based within TEOs; in others, iwi organisations, community and social service providers and professional bodies or industry associations may be best placed to provide this support, particularly where they already have strong relationships with learners, whānau and employers. Flexibility in delivery will be important to ensure that navigators are responsive to local needs, culturally grounded, and seen as trusted, independent guides.

In our view, successful implementation will require national-level guidance on role expectations, qualifications, caseloads, and support structures — alongside locally tailored models that reflect the specific needs of learners and industries. This includes ensuring that navigators are able to assist learners through all phases of the journey, including transition into employment and progression within the workforce.

We do not believe this kind of support can be delivered as a bolt-on to existing services. Instead, we see the navigator model as part of a broader change that positions learner wellbeing and career success at the centre of the vocational education system.

Demand for devolved, regional decision-making

There was also strong alignment around Change 2 (devolved planning and funding decisions). The subsidiarity principle resonated with respondents, with calls for more local and industry-informed decision-making tied to workforce and infrastructure priorities.

These findings suggest widespread support for shifting planning and funding authority closer to the regions, where decision-makers are better positioned to respond to local workforce needs, industry dynamics, and learner contexts. Respondents viewed devolved decision-making as critical to improving system agility, strengthening partnerships with employers, iwi and communities, and ensuring investments align with regional development priorities and aspirations.

The feedback tended to reinforce our view that industry should have a greater and more formalised role than what is currently envisaged in the legislation before Parliament. Many respondents called for stronger mechanisms to embed industry voices in both strategic planning and investment decisions. This is particularly important in sectors where workforce transformation is occurring rapidly and where employers are already investing significantly in training provision.

From a regional perspective, we think that cross-regional mayoral fora and economic development agencies should have a more explicit and formalised role in vocational education and workforce planning. These bodies are already closely aligned with infrastructure investment, labour market development, and local innovation priorities.

They can offer a valuable platform to integrate vocational education into broader regional development strategies as the City and Regional Deals framework is extended and embedded. Devolved funding and planning models should be designed to work alongside these structures to drive joined-up, future-focused investment in skills and workforce resilience.

Support for industry co-investment

Change 5 (the introduction of industry levies) was broadly supported across respondent groups. Stakeholders appreciated the intent to incentivise meaningful employer participation and foster shared responsibility for workforce development, particularly when paired with a rebate mechanism and industry-led governance.

While some endorsed the levy as a way to address the “free-rider” problem (where certain employers benefit from training without contributing), others challenged the premise of a widespread “free-rider” problem, arguing that most employers already contribute significantly through informal training and lost productivity.

These findings suggest that the levy design should emphasise the positive outcomes it might enable, including greater industry control over how education and training is resourced, the benefits to those that already train and the opportunities to explore more flexible and innovative approaches.

The feedback also reinforced our view that industry governance of levy funds is crucial. This includes ensuring that levy mechanisms are designed in partnership with industry groups, with clear accountability, flexibility to respond to sector-specific needs, and mechanisms to reward and better support those already investing in training.

8.2 Areas of Caution and Complexity

Concerns about shifting costs to workplace-based learners

Change 4 (increasing workplace-based learner fees) was the most contested proposal. While most acknowledged the need to improve the types and levels of support for workplace-based learners, both survey and interview data revealed significant discomfort with placing a greater financial burden on apprentices and trainees, especially without:

- Corresponding increases in wages;
- Robust employer contributions;
- Expanded access to student loans and hardship support;
- Stronger safeguards for equity and retention.

Some stakeholders make a compelling case for a fees-free approach to apprenticeship training. Removing fees is seen as reducing financial barriers, especially for groups underrepresented in work-based education and tertiary education generally. It would align with the wider tertiary settings where learners benefit from the first year of fees-free study and would signal parity between academic and vocational pathways.

Proponents argue that apprenticeships offer substantial public benefit (such as strengthening the national skills base, addressing workforce shortages, and supporting social mobility) and that this justifies full public investment. However, the fees-free model carries a high fiscal cost and raises questions about targeting. Without mechanisms to focus support where it's most needed, the policy could end up subsidising learners who would have enrolled and succeeded anyway, while reducing incentives for employers and learners to stay engaged. The subsidised interest-free student loan scheme is seen by proponents as striking a balance, with the government and the learner each playing a role and with the learner's contribution deferred until they are in a position to pay.

Others argue that the current fee regime should be maintained. This approach avoids immediate disruption and preserves existing funding relationships between government, employers, and learners. It also avoids additional fiscal risk and allows time for other system changes, such as improved quality assurance, stronger employer engagement, and better learner support, to take effect.

However, maintaining the status quo risks perpetuating barriers to access and, especially, to adequate learning support in the workplace, particularly for those who already face systemic disadvantages. It also raises questions about fairness, as learners engaged in campus-based study or comparable programmes may pay more and receive more consistent financial support than those learning on the job.

As noted above, the most contested option was increasing fees for apprentices and trainees. While some see this as a way to ensure cost-sharing and reinforce the value of training, many stakeholders expressed deep discomfort with the idea. They noted that apprentices already contribute through lower wages and the other opportunity costs of training, and that the private return on training is far from guaranteed, particularly for learners in low-wage or precarious employment.

Without wage increases, robust employer contributions, or expanded access to loans and hardship support, higher fees could deter participation and deepen inequities. There was a strong consensus that if any cost increases are considered, they must be offset by targeted supports and stronger safeguards for equity and learner retention.

Viewed together, these perspectives suggest that while there is recognition of the need to strengthen support for workplace-based learners, a simple fee increase is not seen as the answer. Instead, many stakeholders favour a more nuanced solution that might include co-investment models, targeted subsidies, or performance-based rebates.

Such approaches could share costs more fairly across government, employers, and learners, while maintaining access, encouraging quality, and ensuring that those who benefit most from training are also contributing to its sustainability. We are cautious about this approach given the complexity of the system currently, and so any initiatives would need to be well-integrated with the current policy, funding and regulatory settings.

Uncertainty about institutional readiness

While there was strong philosophical support for Change 2 (devolution), some stakeholders expressed concern about capacity and capability at the regional level to manage planning and investment in the way we envisaged. Similarly, some questioned whether TEOs were currently equipped to take full advantage of increased flexibility without regulatory clarity and capability uplift.

There was broad agreement that bringing decision-making closer to employers, iwi, and communities is essential for a more responsive, place-based vocational education system. However, many questioned whether the necessary structures, leadership, and capability currently exist to make this work.

The capacity of local actors may vary, and there can be concerns that without deliberate system design and investment, devolved funding decisions could become ad hoc or dominated by more vocal sectors, rather than being strategic, equitable, and aligned with long-term workforce planning.

There may be similar concerns about the capacity of TEOs to take full advantage of increased flexibility. While the intent to empower providers to be more agile and learner-focused was widely supported, flexibility alone is not sufficient.

It must be accompanied by regulatory clarity, data infrastructure, and professional development to shift organisational culture from compliance to innovation. Some TEOs are still recovering from previous reforms and may lack the capability to engage in the way we anticipate or to redesign delivery models in response to local need. Stakeholders stressed that change fatigue and resource constraints could limit providers' ability to respond positively to devolved settings without additional support.

A key part of the proposed model is the role of ISBs, which are set to replace WDCs from 1 January 2026. While ISBs are expected to play a central role in aligning provision with industry needs and informing investment decisions, they will be new organisations still forming their governance, processes, and credibility.

The kind of co-ordinated, industry or regional-level decision-making proposed under Change 2 has proven elusive even for well-established government agencies, and there is concern that expecting newly formed ISBs to perform this role effectively from day one is unrealistic. Stakeholders emphasised the need for clear mandates, sustained investment in ISB capability, and strong relationships with both providers and regional entities like economic development agencies to avoid duplication, competition, or confusion in the system.

There were also concerns about equity, accountability and consistency. If readiness is uneven across regions, sectors, or institutions, there is a risk that learners in some areas will receive lower-quality support or be excluded from emerging opportunities. There is a case for a phased approach to devolution, starting with regions or sectors that demonstrate strong collaborative infrastructure and using those experiences to inform national scaling.

In summary, while there is strong support for the intent of devolved planning and investment, bringing decision-making closer to the people and industries it affects, this transition must be carefully planned and supported.

Success will depend on building the capability and systems of regional actors, economic development agencies, TEOs, and the newly established ISBs. Without this, there is a real risk that the promise of local responsiveness and shared leadership could be undermined by fragmentation, inequity, and implementation fatigue.

Mixed views on performance-based investment

Although Change 3 (long-term funding) was positively received, several respondents noted the need for transparent and equitable performance measures that reflect learner outcomes (especially for equity groups) and alignment with employer expectations and skill needs rather than just enrolments or graduate counts. There was a clear preference for multi-dimensional value measures, including employer satisfaction, learner wellbeing, and regional skills impact.

Stakeholders also highlighted the complexity involved in designing and implementing investment models that meaningfully reflect performance and impact. Measuring value in vocational education is inherently multi-faceted and context-dependent, particularly in work-based learning, where outcomes are jointly produced by learners, employers, and providers over time.

There is often a lag between investment and measurable impact, and data on long-term learner outcomes, employer satisfaction, or regional labour market alignment is not always consistently captured or accessible. For some groups, a focus on educational output performance over the short term may obscure other, more desirable, outcomes.

Performance-based funding models are not new to the system, however indirect the implications for funding. However, the fundamental reliance on a volume-based, fixed price model has remained intact for over 50 years. If performance-based investment is to be a meaningful feature of the reformed system, it must evolve to better reflect what matters most: sustained employment outcomes, the quality of learning in the workplace, contribution to regional and sectoral priorities, and the experience of underserved learners.

A one-size-fits-all model is unlikely to be effective, and a more developmental approach, in which investment expectations are co-designed with sectors and regions, and linked to capacity-building support rather than punitive funding shifts, is needed.

In summary, while there is strong support for shifting toward longer-term, outcomes-focused investment models, these must be underpinned by a shared understanding of value, robust data systems, and a clear commitment to equity. Designing such models will require thoughtful engagement across the system and a willingness to move beyond traditional metrics to build a more holistic and meaningful view of performance.

Trade offs

While the proposed reforms received strong support in principle, stakeholder feedback revealed several system-level tensions that will need to be addressed as the changes move from design to implementation. These tensions are not flaws in the proposals themselves but reflect the inherent complexity of shifting a fragmented, centralised system toward one that is more devolved, equitable, and outcomes focused.

Balancing Devolution and National Consistency

A central theme in the feedback was the desire for greater regional decision-making and industry leadership (Change 2). Respondents were clear that employers, iwi, and local partners are better placed to respond to workforce needs, build training partnerships, and align investment with regional development priorities. However, some also cautioned that too much decentralisation risks weakening national coherence, especially in qualification standards, learner entitlements, and quality assurance. This tension reflects a broader trade-off between place-based responsiveness and system-wide equity and comparability.

This feedback highlights the need for a hybrid governance model, where central agencies set clear national expectations and frameworks (particularly for Te Tiriti compliance, quality assurance, and equity) but delegate meaningful decision-making powers to industry and regional entities with the capacity and authority to act.

Stability vs. Accountability in Funding

The shift to five-year funding agreements for high-performing providers (Change 3) was widely welcomed as a way to promote innovation, continuity, and confidence in regional delivery. However, some respondents expressed concern that longer-term funding arrangements could reduce financial accountability if not paired with clear and meaningful performance expectations.

The design of these agreements will therefore need to balance a trade-off between stability and responsiveness offering providers the security to plan and invest, while ensuring funding remains tied to demonstrable outcomes for learners, employers, and the public. This will require a shared understanding of what constitutes value, robust data systems, and mechanisms for continuous review and adaptation.

Flexibility vs. Compliance

Many participants called for more flexibility in delivery to support innovation, modular learning, and faster responses to skill shortages. At the same time, several warned that current regulatory settings (particularly programme approval processes and micro-credential rules) have been used to protect quality and learner outcomes in a complex system.

This reflects a deeper tension between adaptability and system stewardship. Removing constraints without building capability and safeguards could lead to uneven quality or erosion of standards. Regulatory reform (Change 6) will need to strike a careful balance between enabling new approaches and maintaining trust and integrity across the system.

8.3 Divergence from Original Assumptions

Notable divergences between the discussion paper's assumptions and its findings and stakeholder feedback include:

Discussion Paper Assumptions	Stakeholder Feedback
Workplace-based learners can contribute more financially if fees are loan-eligible	Learners are already financially stretched; fees risk undermining access and equity
ISBs are ready to take on a stronger funding role	Governance and capability need strengthening before significant devolution occurs
Value-based funding will drive performance	Requires clear, co-developed metrics to avoid perverse incentives or inequities
TEO flexibility will result in innovation	Must be accompanied by regulatory reform and funding stability

The feedback received during the engagement process revealed several important mismatches between the assumptions in the discussion paper and the realities experienced by those across the vocational education and training system. While stakeholders generally supported the direction of the proposed reforms, they also urged caution, emphasising that system change will succeed or fail based not just on vision, but on the details of implementation.

One key area of divergence concerned the financial contributions expected from workplace-based learners. The paper suggested that, with access to student loans, learners could reasonably be expected to contribute more toward their training. But this assumption failed to resonate with many on the ground. Stakeholders described a context in which learners, particularly those from 'equity groups', are already operating on tight financial margins. Even with loan access, additional fees could present a significant barrier, undermining participation and retention in a system that aspires to be inclusive. Debt is not a neutral tool, especially for learners whose wages may remain low well into their careers.

Another assumption that drew scrutiny was the readiness of ISBs to take on expanded roles in shaping funding decisions. Stakeholders welcomed the idea of stronger industry leadership but stressed that ISBs will be new entities as of January 2026. As such, they will still be building governance structures, operational processes, and trust across the system. Expecting them to lead complex, high-stakes investment decisions early in their lifecycle risks overburdening fledgling organisations and producing uneven results. Many suggested a more phased approach that builds capability over time and allows for adaptation based on early learning.

The proposed move to value-based funding was also met with a mix of optimism and caution. There is strong support for shifting away from blunt volume-based metrics toward a richer understanding of impact that considers learner progression, equity outcomes, and industry relevance. But stakeholders were clear: without well-designed, co-developed indicators, such models could create perverse incentives or inadvertently disadvantage providers serving high-needs learners. The system has seen this before. Lessons from earlier performance regimes suggest that care must be taken to avoid reinforcing narrow definitions of success.

Finally, the paper anticipated that greater flexibility for TEOs would naturally foster innovation. In theory, loosening constraints should allow providers to better respond to local and industry needs. In practice, however, flexibility without enabling conditions such as regulatory clarity, consistent funding, and space for experimentation, would not be enough. Some providers are still grappling with the aftershocks of previous reforms, and many are risk-averse in an environment where funding can be unpredictable and compliance burdens are high.

Taken together, these divergences signal a need to recalibrate the implementation strategy. Rather than assume that reform levers will operate as intended, the system must invest in building the conditions that allow change to take root. That includes strengthening the capabilities of new institutions, ensuring learners are supported rather than burdened, and working alongside stakeholders to develop meaningful, equitable performance frameworks.

Reform will only succeed if it is grounded in the lived realities of those it is meant to serve and if it takes seriously the complexity of translating policy ideas into workable, durable system change.

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