

## **ConCOVE Tūhura's submission on the proposed vocational education and training reforms**

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Tēnā koutou

We welcome the opportunity to submit the Construction and Infrastructure Centre of Vocational Excellence's (ConCOVE Tūhura) feedback on the redesign of the vocational education and training (VET) system.

ConCOVE is a member-organisation formed through a consortium of education, industry and other providers to the VET sector. ConCOVE's purpose is to enable vocational education in the construction and infrastructure sector to be more productive, sustainable, and resilient. Our member numbers are 390, with subscribers numbering close to a thousand. These people are architects of the system, including employers, those involved in training design and delivery and monitoring of our ongoing work programme. We have a volunteer network of Advisors, grouped by the communities they represent; Māori, Pacific peoples and women.

Construction and infrastructure are vital pillars of New Zealand's economy contributing 6.3 per cent of real GDP to March 2023 and 308,500 workers (Building and Construction Sector Trends 2023, MBIE). Core challenges in the sector include pipeline uncertainty and workforce needs. Failing to address systemic, long-term, workforce development needs for our sectors in the current VET redesign will only ensure the perpetuation of these significant industry challenges.

At ConCOVE, we take a systems view of how transformative change can be achieved for vocational education in construction and infrastructure. As such, our views are not solely focussed on standards setting, qualification development, training delivery and funding mechanisms. Rather, our views incorporate the wider functions of the sector, including the need to address systemic behavioural change required to make construction and infrastructure workers thrive.

We strongly encourage consideration of the impact on the wider sector in any proposed changes to how VET is arranged in New Zealand. A narrow focus, with one goal, will only create further damage to a vocational education sector that requires a more visionary approach to its design. The short timeframe for this consultation is also seriously concerning, with reform proposals that lack an evidence-base to enable sound decision-making.

Rather we are presented with proposals that perpetuate vocational mediocrity.

ConCOVE's recent analysis of 67 skill standards approved by the current system has highlighted significant quality assurance concerns. There is a critical need for a robust industry-led system that can deliver high

quality, consistent, and relevant standards across VET. We question the ability of the proposed system to do so, given the lack of inclusion of core supporting system organisations such as the New Zealand Qualifications Authority and the roles of the Tertiary Education Commission, Ministry of Education and the apparent wider disconnect to such ministries as the Ministry of Business, Innovation and Employment (across multiple roles e.g. workforce development, procurement, building) in the proposals.

Further, we are disappointed that research, and in particular, innovation, is not addressed in the current proposals. This represents a significant omission and a missed opportunity. ConCOVE's work has far-reaching opportunities for system change and innovation that has not yet been seen in New Zealand. ConCOVE's outputs also have pan-sector relevance and offer the opportunity for New Zealand to create a world-class vocational education and training system.

Since our project fund was established in 2022, ConCOVE has reviewed more than 90 projects from across industry. A number of these initiatives were previously unable to secure funding due to constraints within the former VET system, prompting them to seek support from ConCOVE to address research and innovation needs. There are currently 23 projects underway and more in development.

Innovation must be considered at the forefront of any new system design and our responses in this version (a Supplementary Submission is also available) positions research and innovation as a core component of the future need of a thriving construction and infrastructure sector in New Zealand.

## **Proposal 1: Creating a healthy ITP network that responds to regional needs**

*9. Do you agree with the consultation document's statements on the importance of ITPs?*

Neither agree nor disagree.

*Why / Why not?*

As reflected by others in the vocational education ecosystem, ITPs have always played a significant role in the delivery of campus-based learning. Where ITPs have not always shone brightest is in supporting work-based learning. We agree that better integration of campus-based and work-based learning is desirable to embed practical skills for ākonga and support employers who may not be equipped to train and assess at this stage.

For construction and infrastructure training delivery models vary in both access and quality. We strongly advocate for a system where quality is consistent across the board, from campus-based to work-based, and where pathways to access construction and infrastructure are clear to learners. Our project on infrastructure training, ***Civil construction: A requirement for a robust and reliable training pipeline***, written with significant input from industry, concluded that: "One of the primary reasons for underinvestment at the industry level in education is high costs. This is, in part, due to high capital costs in training individuals on large and specialised

machinery”. One or more dedicated campuses are a key component in helping address this underinvestment and are the norm in training structures overseas.

The large campus would sit within an integrated training pathway. Education should move away from isolated projects and disjointed training and focus on construction vocational education as a cohesive whole.

We also note that, by its very nature construction and infrastructure training has a large ‘hands-on’ component that cannot be delivered via online-learning.

National consistency is key. Our **Supplementary Submission** sets out a blueprint for national consistency whilst retaining some regional autonomy.

*10. What do you consider to be the main benefits and risks of reconfiguring the ITP sector?*

We consider there is **more risk** than benefit in the reconfiguration of the ITP sector.

- While we acknowledge the government’s desire to seek financial certainty from the ITP sector, the current arrangement is providing a pathway toward that certainty.
- The more competitive model that will exist through the proposed approach will return the VET sector to the model that existed before the Reform of Vocational Education (RoVE). This also increases costs e.g.
  - through multiple programme design and development, resulting in
  - duplication of effort and unwarranted variation in teaching and assessment practice.The whakatauki ‘Ka mua, ka muri’ speaks to the idea that we should look back to walk forward – this approach is highly advised.
- While some communities may value the benefit of a regional ITP, regional ITPs will not have the capacity to respond to national industry needs and consequently will not serve the very community it aspires to. Our **Supplementary Submission** sets out an alternative proposal that provides an avenue for some regional autonomy whilst maintaining the focus on consistency and national coordination.
- Reconfiguring ITPs to a regional model will not consistently deliver to many industry sectors with a nationwide focus. Several of the allied trades have voiced this concern through the years. ConCOVE's research has highlighted that ineffectiveness of uncoordinated approaches: “Several small-scale training initiatives have taken place, operated by a diverse array of government agencies, local authorities, NGOs, and industry trainers. However, these initiatives are generally working in isolation, and few have achieved longevity.”

- Anecdotally, the amalgamation that resulted in Te Pūkenga appears to have alleviated some pressure for skilled tutoring kaimahi in the regions. Returning to a regional model may simply reintroduce this pressure.
- Remote delivery, as is being proposed, does not suit construction and infrastructure. Nor is remote delivery necessarily suitable for all learners. ConCOVE's investigation ***Appreciating and supporting neurodiversity in VET*** further investigates this.
- ConCOVE's ***Civil construction: A requirement for a robust and reliable training pipeline*** research finds that an integrated training pathway is necessary across the civil infrastructure sector. Including a united effort from the government, industry, and vocational education and training organisations to tackle New Zealand's skilled labour shortage. The seamless movement of learners across both work-based and campus-based learning is integral to both construction and infrastructure.
- Further, in the ***From skilled industry practitioner to kaiako*** research on the investment on developing educators in the ITP system shows inconsistencies in the development of educators in campus-based learning, compromising the outcomes for learners in construction and infrastructure. A reconfigured ITP sector will not improve this outcome.

**Global context:** Lessons from many European models integrate campus-based and work-based learning.

11. Do you support creating a federation model for some ITPs?

We **disagree** with the proposed federation model.

Why / Why not?

While there **may** be some fiscal benefit to poorer performing ITPs joining a federation, please refer to ConCOVE's ***Supplementary Submission*** which outlines our vision for a reimagined provider structure, focusing on the creation of two hub campuses, one in the North Island and one in the South Island.

Our key concerns:

- While we acknowledge the government's desire to seek financial certainty from the ITP sector, the current arrangement is providing a pathway toward that certainty.
- The proposed federation model does not provide sufficient information about practical implementation and long-term implications. This seems like change for the sake of change. There are important questions still not answered:
  - How does the federation model substantially differ from the existing arrangement, particularly concerning shared services?

- What mechanisms will be in place for ITPs to join or leave the federation?
- If an ITP exits the federation after integrating into shared services, how can it do so without incurring significant additional costs?
- How will the model address the many conflicts of interest between The Open Polytechnic and the federated ITPs it supports?
- This may well be another experiment without evidence. There is no assurance that Open Polytechnic, while successful as a distance learning organisation, will have the capability to serve as an anchor organisation for a strong federation to serve all of Aotearoa's ākonga and kaiako. The skills and structures required to support online learning and teaching are very different to those required for on campus, work-based and community-based learning and teaching. ConCOVE's trilogy of work investigating the needs of campus-based educators, work-based educators (employers) and support roles of training advisors indicates there is no one-size-fits-all solution.
- Resistance to the federated model will result in several unintended consequences: increased competition, lack of national delivery accountability, poor communication across the proposed network, lack of portability of learning and inconsistency in quality assurance. History tells us that quality assurance is a big risk in a devolved model (e.g. Tai Poutini in 2017) that could result in poorly skilled construction workers.

A national network, properly flexibly funded, with some regional autonomy will enable an appropriate level of collaborative competition – co-competition – that sees innovation in delivery models. We set out such a model in our **Supplementary Submission**.

*12. What are the minimum programmes and roles that need to be delivered by the new ITP sector for your region?*

ConCOVE's current work-plan is focussed on core needs for a thriving construction and infrastructure sector. As we have reflected above, national consistency is key and ITPs are one part of the wider delivery system. Where work-based learning does not support key, transversal skill development, ITPs have a wider role to play.

In construction and infrastructure, we note the average age of people entering our sector is 35, with over 60% of new entrants transitioning from other sectors. ITPs have a key role to play in early career exposure and core, baseline, skills. These core skills – such as those delivered in pre-trades – **must** be industry assessed for legitimacy in the workforce.

Some other core-skills examples include:

- Embedded financial and digital literacy

- General work readiness programmes
- Business ownership and leadership skills for trades

Our research is exposing gaps in ITP delivery across the regions in the system as it stands. For example in a ***Stocktake of Construction and Infrastructure Trades Academies for New Zealand Secondary Schools*** highlighted that most of the South Island (bar one small part of the West Coast) and the Bay of Plenty and Hawke’s Bay regions in the North Island are not serviced by introductory infrastructure trades academies. This represents more than two-thirds of New Zealand where young people cannot access early exposure to our sector. Focused infrastructure programmes via ITPs in regions that have significant infrastructure requirements would support students to understand the many options within the sector.

Based on VET systems that exist in other jurisdictions, and the recently published OECD Education at a Glance 2024 (OECD (2024), *Education at a Glance 2024: OECD Indicators*, OECD Publishing, Paris) an integrated school to work training pathway would support early access to construction and infrastructure sector. While ConCOVE's ***VET in schools*** project will look to identify ways that this might occur in New Zealand, without a connected ITP system we will struggle to deliver this key transition needed for young people.

Funding must also support this flexible delivery.

*13. What are the critical factors needed (including functions and governance arrangements) to best support a federation model?*

As articulated in Q.11, the lack of evidence that a federation is robust enough to serve ākongā and employers makes it difficult to respond to this pātai in an informed manner.

The move to bring the whole system, not only ITPs via a federal model, closer to government and further away from industry is also concerning. The complexity of a federal model, with the potential for competition amongst ITPs, will not provide a flexible and responsive VET system. Such a structure seems more likely to foster rivalry and inefficiency rather than collaboration and innovation.

Whatever the model, it will require:

- National consistency, for both delivery and assessment, that meets industry needs. While a regional focus will provide support for the communities served, industry must have the ability to ensure a consistent outcome, whether you are training in Invercargill or Whangārei.
- Streamlined governance. Increased cost and bureaucracy does not lend itself to innovation. A governance structure that enables operational flexibility and responsiveness is required.

- Commitment to Te Tiriti o Waitangi, with Māori representation and a commitment to the voices of all learners and employers will be required.
- More opportunities to support workplaces that are engaged in training i.e. targeted funding assistance; contemporary learning resources, bridging the digital divide often found in smaller workplaces. ConCOVE's soon to be released report *Evaluation of government policy settings for apprentices* will provide some guidance here.
- The structure must also support critical flows in construction and infrastructure, i.e. ITPs need to be fully equipped to be able to support campus-based learning when employers are unable to carry the burden of training (market uncertainty). Equally, employers must be supported in times of economic growth, with ITPs ensuring overflow support. Portability of learning between these modes of learning is critical.

**Global context:** ISATCOVE is an internationally available tool developed by the European Training Foundation, for ITPs to self-measure and benchmark their capabilities across multiple variables, and against multiple ITPs. A tool such as this, that enabled New Zealand ITPs to measure their success against global organisations, would support the growth of a thriving VET system in New Zealand.

## **Proposal 2: Establishing an industry-led system for standards-setting and industry training**

### *14. Which option do you prefer overall?*

Option B replace WDCs with industry-specific standard-setting bodies. However, only if necessary. The lack of evidence to support change in this area is alarming, particularly in construction and infrastructure where the primary Workforce Development Council Waihanga Ara Rau has strong support from industry. This, coupled with the short timeframe for this consultation makes decisions on this proposal difficult.

Why?

ConCOVE supports a model where:

- Standard-setting is separate from arranging training, minimising any potential conflict of interest.
- Construction and infrastructure remain connected (not in separate SSBs) to ensure consistency across workforce planning and qualification development in those sectors.
- There is minimal disruption to a system that needs more time to bed in changes from RoVE.

Option B is likely to create more opportunity for other education providers to arrange training while standard setting bodies focus on qualification development, quality assurance and increased moderation. The market will become highly competitive under this model and while some competition is positive, fragmentation does

not support clear and visible pathways for learners. Nor does this support the consistency in outcome that industry requires.

We note five concerns:

1. Funding for standard-setting should sit across the wider system, including campus-based learning and the work-based learning component Standard-setting must also be funded appropriately.
2. In the current proposal there is no way for innovation in the construction and infrastructure VET sector to be enabled. This function, a critical function of ConCOVE (and indeed its Food and Fibre counterpart), is necessary. Examples of where ConCOVE is pushing the boundaries of vocational education development include our **Degree-level apprenticeship** project (piloting degree level attainment through work-based learning), a view on **Capstone assessments**, assessing options for VET to be better integrated into our compulsory education sector **VET in Schools**, critical skill development for leadership and business ownership in construction and infrastructure through the **Tradie to business owner/sector leader** project, and others. In the current proposal the loss of this function and the ability to focus on future workforce and VET needs will critically impact workforce development in construction and infrastructure.  
Functions across government cannot deliver this independent, industry driven, voice and WDCs/ITBs will not have the capacity to do so.
3. Should standard setting bodies (WDC / ITB) lose the function of providing investment advice to TEC, ConCOVE proposes that this function could be part of a service package a reimagined CoVE could deliver. Our **ConstructTrend** tool (project in progress) will deliver longitudinal data to alleviate consultation fatigue and provide real time guidance to standard setters and the Tertiary Education Commission. Our **Workforce Journey Indicator** data explorer will deliver a comprehensive view of the workforce, especially if extended to other sectors. Projects such as **Evaluation of government policy settings for apprentices** (in progress) and a project about to commence looking more widely and funding and incentives will provide independent advice about investment in vocational education and training.
4. Work-based learning should not stand-alone. In ConCOVE's **Supplementary Submission** we outline how this should be established to better serve the needs of the wider construction and infrastructure sector and its employers. Seamless arrangements for learners, starting to be established in the current system, and to support critical flows in construction and infrastructure (as outlined in Q.13), i.e. ITPs need to be fully equipped to be able to support campus-based learning when employers are unable to carry the burden of training through work-based learning (market uncertainty). Equally, employers must be supported in times of economic growth, with ITPs ensuring overflow support.
5. Separation of Construction and Infrastructure. ConCOVE supports keeping both together. While the sectors are distinct in focus, in execution there is considerable overlap. Remaining connected will ensure consistency across workforce planning and qualification development in those sectors.



**Global context, New Zealand application:** Apprenticeship Support Australia is a national organisation that supports both employers and learners, focussing on improving apprenticeship commencement and completion rates by offering comprehensive support throughout the entire employment lifecycle. Such a model, if applied to New Zealand’s work-based learning organisations and connected to a differently structured ITP offer could support a more connected response to arranging training, pastoral care and qualification completion.

Under Option A, which ConCOVE does not support, there are a significant number of concerns.

- A return to a pre-RoVE model that supported large industries and occupations only – due to the link between funding for arranging training and standard setting.
- Lack of responsiveness in terms of new qualifications and emerging need. An innovation function, such as that offered by ConCOVE is needed in any future-focussed VET system.
- A lack of industry voice.
- Focus on qualification development activity that is most closely linked to revenue generation not future and developing needs
- Perceived conflict around ITOs ability to effectively moderate the consistency of their own assessment.
- Lack of adequate funding for moderation and quality assurance.
- Separation of construction and infrastructure.

*15. What are the main features and functions that Industry Training Boards (Option A) need to be successful?*

ConCOVE does not support Option A.

*16. Under Option A, how important is it that Industry Training Boards and non-Industry Training Boards be able to arrange industry training?*

ConCOVE does not support Option A.

*17. What are the main features and functions that industry standards-setters (Option B) need to be successful?*

- A clear and focussed mandate, that is led by industry.
- National consistency to ensure industry receives expected outputs, regardless of where training is ultimately delivered. Could be delivered via capstone assessments in some industries, for example.
- Regular review and updating of standards: The entity must have a process for regularly reviewing and updating the standards they set to keep pace with changes in industry demands and technology. This

function could work in conjunction with ConCOVE's **ConstrucTrend** tool (which may have the potential to expand to include industry sectors other than Construction and Infrastructure).

- The ability to provide advice to the Tertiary Education Commission, and other key agencies, to ensure that industry has a voice into government and can provide advice into programme funding and workforce planning to meet the workforce needs. The addition of a CoVE like function (though our preference would be for an independent CoVE) would provide a system-wide view of workforce planning connected with, and back to, cross Government Agencies such as MSD, TEC, Immigration, and MBIE.
- Adequate funding must be provided to the industry standard-setter to ensure that it can effectively develop qualifications, quality assure and moderate activities to ensure national consistency, quality and support industry goals.

*18. Are there any key features of the Workforce Development Councils that need to be retained in the new system?*

Yes, we consider Workforce Development Councils, particularly those that support construction and infrastructure, should be retained. ConCOVE works with both Waihangā Ara Rau and Hanga-Aro-Rau on key research and innovation projects in such a way as to support future thinking. They have developed strong connections with industry and through the separation of standard setting and arranging training, and smaller, yet critical industries are being heard. We note that there is some disconnect across the wider built environment when considering how industries are aligned to WDCs however, and addressing this through an analysis of the building supply-chain (as an example) would be advised.

Key features required;

- Workforce planning. However, this must be linked to where action can be taken. For example, indicating the need for x new plumbers does nothing to ensure training uptake in those sectors. Strong collaboration and early engagement with training providers to ensure that once products are designed, providers have the capacity, and capability, to deliver.
- Industry voice and a direct link to government. Alongside advice to TEC, advice on labour-market interventions to key agencies would support this. Again, this is an overflow function that a funded CoVE could support.
- It will be important to retain organisations in the wider system that can support WDCs to deliver to future industry needs, beyond core standard setting roles. CoVEs have fulfilled this role till now.
- Governance structure must be balanced through a strong skills-base, must reflect a commitment to Te Tiriti o Waitangi and the industries the WDC serves.

*19. Are there any key features of how the previous Industry Training Organisations worked that should be re-introduced in the new system?*

For the most part Industry Training Organisations of old were inherently conflicted through their dual role of standard setting and arranging training, leading to behaviour driven by funding and poor outcomes.

We note that there was a closer feedback loop between qualification development and employers and learners in workplace training however.

The research ConCOVE has undertaken ***Investigating training advisors in work-based learning in the construction and infrastructure sectors*** recommends that there be a consistent, non-competitive approach to supporting learners across work-based learning, where barriers to the flow of apprentices in the construction and infrastructure apprenticeship system could be removed. This includes supporting apprentices to change employer, work-based learning provider and/or vocation where appropriate. The report also recommends regular, comprehensive, assessments of the practices of training advisors and to ensure those practices that best enable training advisors to support employers and apprentices navigate the training journey are codified into policy.

The Apprenticeship Support Australian model is worth considering in this context.

*20. What are the possible benefits and risks of having a short moratorium on new industry training providers while the new system is set up?*

There is significant confusion in the market already, both for learners and employers, given the rolling changes across the VET sector in New Zealand since 2019. Competition can provide improvements across the system however, too much competition further exacerbates the confusion experienced by learners looking to navigate pathways.

We also fear the real possibility that the construction and infrastructure sectors (and other sectors) will reduce commitment to formal training, resulting in an increase in non-formal training leading to greater inconsistency in delivery and, more importantly, outcomes. While this will meet immediate industry need, fit-for-future approaches that exist in the formal model will be ignored. This could be considerably detrimental in industries requiring formal registration.

Finally, we note the overall lack of detail and vision for a fully connected system in the proposal, and the omission of research and innovation to support a vision for the future.

### Proposal 3: A funding system that supports stronger vocational education

21. To what extent do you support the proposed funding shifts for 2026?

ConCOVE does not support the proposed funding shifts for 2026.

Specifically;

- Removal of the Learner Component is seriously concerning. There is some sentiment that exists to suggest that organisations will “simply look after these learners anyway”. Unfortunately, history tells us that these learners have been underserved and under supported in previous systems.
- Removal of the Strategic Component of the Unified Funding System (UFS) is also concerning, especially when considered alongside the removal of funding for CoVEs and the lack of consideration of research and innovation overall in the proposal. The proposal suggests the bare minimum and will only achieve mediocre outcomes for the future workforce.
- Finally, we are concerned that standard setting is proposed to be funded solely from the work-based learning component. This suggests a further reduction in funding for work-based learning – the key delivery mechanism for construction and infrastructure workforce development.

22. What benefits and risks need to be taken into account for these changes?

ConCOVE does not support these changes.

- While increased provider rates have an obvious benefit to providers who have been adversely impacted by declining rates, one must also balance provider ‘needs’ with genuine industry needs, i.e. If providers aren’t sufficiently innovating to deliver to industry need, it could be argued that increasing funding rates will simply enable those providers to keep delivering outdated, not fit-for-purpose products.
- Funding is being moved away from work-based delivery.
- Concern around the removal of the Strategic Component exists alongside the removal of funding for future thinking, research and innovation that CoVEs delivered. The Strategic Component could be repurposed to support future CoVE activities, and at the very least, have criteria around access more clearly articulated, including criteria for equitable access.
- We are also concerned that there is no system view, and appropriate funding for, micro-credential development and delivery. ConCOVE's project *The place of micro-credentials in New Zealand* is exploring this challenge. While micro-credentials have a place in skill development, their purpose and the gap they are able to fill is largely misunderstood and under-utilised. This is especially evident in C&I where we have concerns around the uptake of the few micro-credentials registered. We require

a flexible approach that combines larger credentials with micro-credentials where appropriate. Not everything in a career pathway should be broken down into micro-credentials and industry require this flexibility.

*23. How should standards-setting be funded to ensure a viable and high-quality system?*

Key considerations for the allocation of standard-setting funding;

- Dedicated funding for standard-setting to ensure nationally consistent outcomes. This should not come at the expense of work-based learning outcomes or from work-based learning funding. This is critically important for construction and infrastructure.
- Support for industry-led standard-setting. This might include the reallocation of a component of the Building Levy (collected by MBIE and designed to support a range of functions across the building sector, including *information and education*) and the introduction of an industry levy to infrastructure to support.
- We also encourage the government to consider how the wider vocational education system, including compliance and quality assurance requirements imposed by TEC and NZQA are adding unnecessary costs and contributing to inefficiencies. Addressing these issues would reduce the cost burden of education providers, industry and learners and potentially address longstanding concerns about the speed to market for new and updated qualifications.
- Further, ConCOVE's **Skills standards** project has found considerable inconsistencies in standard development across different WDCs and NZQAs own, published standards, noting that there has been no guidance from NZQA on what best practice looks like. Our report notes "good practice guidance is exactly what is required", however there appears to be a lack of accountability from NZQA in detailing this.
- Incentive-based additional funding could be introduced using performance metrics such as:
  - number and quality of standards and other credentials developed
  - employer and ākonga satisfaction
  - effectiveness of standards in improving training outcomes and employability

*24. How should the funding system recognise and incentivise the role that ITPs play in engaging with industry, supporting regional development, and/or attracting more international students to regions?*

In ConCOVE's **Supplementary Submission** we outline an approach that calls for a hub and spoke type model of regional delivery, where entities supporting the delivery of training such as work-based learning provision is also supported via the ITP network. Collaboration and appropriate funding across all entities in one region is needed to ensure consistent delivery both for the region and for national consistency.

ConCOVE does not support the redirection of funding intended to support domestic tuition subsidies to support ITPs to develop offerings for international students, especially at the expense of work-based training provision.

Key requirements:

- The current proposals do not incentivise ITPs to work together to deliver to national consistency.
- If construction trades are to be offered in every region there needs to be some way of monitoring the consistency of training delivery. Already industry, e.g. plumbing, has expressed concern that the quality of facilities in the ITP network is sorely lacking. Industry is also concerned with the capability of the learners who have completed entry-level trades education resulting in limited positive employment outcomes.
- In ConCOVE's Supplementary Submission anchor facilities could provide nationally consistent delivery for core sectors. They would need to be funded to
  - Support core sectors e.g. carpentry, plumbing, electrical and civil.
  - Support the focussed education of teaching staff.
- Funding for learners to access off-job learning, for those who are primarily work-based, especially given the current proposal to reduce work-based learning funding.

*25. What role should non-volume-based funding play, and how should this be allocated?*

Non-volume-based funding should support overflow functions that are needed to ensure a future-focused, robust VET system. Funding should be focussed on continuation of the CoVE activity for example; The investigation and development of standards and qualifications for sunrise industries e.g. energy, mixed methods of construction, off-site manufacturing. The proposal does not fund this function in either reimagined WDCs or through CoVEs. Continued funding for CoVEs will support this overflow function and ensure continued innovation and collaboration across the VET system.

## **Concluding questions**

*26. Could there be benefits or drawbacks for different types of students (e.g. Māori, Pacific, rural, disabled, and students with additional learning support needs) under these proposals?*

There are several concerns ConCOVE holds for Māori, for Pacific peoples and for women in the proposals. We are also concerned for neurodivergent learners, those who live remotely and those who are disabled being able to access learning. Not to mention the lack of support for employers who are supporting these learners.

Our research shows persistent inequities that must be addressed. ConCOVE projects have identified a number of challenges that must be addressed in any VET system redesign.

- Our **Reduce qualifying time for Māori Level 4 carpentry apprentices** project highlighted significant barriers to success for Māori learners.
- The **Upskilling Māori Construction Practitioners** project revealed challenges in progression and success for Māori in the construction sector.
- Our **Workforce Journey Indicators** project identified that nearly two-thirds of Māori and Pacific women leave the construction workforce within two years.
- Our **On-site Upstanders** project identified a culture that felt unwelcoming for women, reinforcing the perception that it's primarily a space for men, and leaving women feeling they did not 'fit in'.
- Similar barriers are being encountered in early work on **Neurodiversity in VET**.

Recent research emphasises the critical importance of on-the-job training from an equity perspective, particularly for Māori and Pacific peoples (e.g. Uptempo, The Southern Initiative, MBIE).

We have highlighted these omissions further in ConCOVE's **Supplementary Submission**.

We also note the lack of support for other services such as careers advice, career pathways support and pastoral care, which are critical functions for learners (particularly those with diverse learning needs) are absent in the proposals.

ConCOVE strongly encourages government to review the Apprenticeship Support Australia model when considering further support required for work-based learning.

*27. Could there be benefits or drawbacks from these proposals for particular industries or types of businesses?*

- Lack of national consistency is highly concerning, particularly in the construction and infrastructure sectors.
- Lack of collaboration and connectedness between work-based and ITP provision is also alarming, especially at a time when skills shortages and workforce development needs are high.
- Smaller industries with specialist needs are not being considered in the national context either.

*28. Are there any other ideas, models, or decisions for redesigning the vocational education system that the Government should consider?*

Please refer to ConCOVE's **Supplementary Submission** for ideas, models and considerations for the wider VET system in Aotearoa New Zealand.