

Redesign of the vocational education and training system (VETS)

Recreation Aotearoa submission to the proposals, September 2024

Submitter details:

Name of contact person:	Sam Newton – Advocacy Manager
Organisation name:	New Zealand Recreation Association t/a <i>Recreation Aotearoa</i>
Postal address:	PO Box 11132, Manners Street, Wellington 6142
Telephone number: <i>(the best number to contact you on)</i>	027 723 9380
Email:	sam@nzrecreation.org.nz

Submission:**Introduction**

1. Recreation Aotearoa is a professional association and industry body responsible for providing leadership, advocacy and professional development opportunities for those involved in the broader recreation sector. We work at an agency, industry and professional level to build capability, develop partnerships, and equip individuals and organisations with the skills they need to deliver high quality recreation experiences that engage participants.
2. Recreation Aotearoa's membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation businesses, and others involved in the delivery of recreation throughout New Zealand. Many of our members are employed to create, manage, and maintain parks and open spaces, across New Zealand.
3. Our role is to champion high-quality recreation for the benefit of New Zealand.
4. Our vision is that New Zealand will have a strong recreation industry that meets the needs of current and future participants, so that through recreation, New Zealanders are active, healthy, and connected.
5. Recreation Aotearoa believes recreation is vital to New Zealand society. Recreation is not just about enjoyment, it is about being healthy, engaged, stimulated, and interacting with others, and this occurs via outdoor recreation, community recreation, parks, and aquatic and facility-based recreation centres.
6. Recreation and its numerous benefits for New Zealand are reliant on skilled, qualified and connected Recreation workforce. Skills and workforce shortages in the recreation sector have dramatic negative impacts on the wellbeing of New Zealanders.
7. Recreation Aotearoa support many of the intents of the proposals, which is to create a unified and cohesive vocational education and training system. It is our view that the current system and the system that existed prior to ROVE, has various flaws, distorted incentives, inefficiencies and blind spots that do not serve the Recreation sector well

Creating a healthy ITP network that responds to regional needs

8. Recreation Aotearoa accepts and understands that there are deep financial sustainability issues within the Polytechnic sphere, but that this is not a problem universally held by all Polytechnics. Enrolments and thus financial sustainability, generally run counter-cyclical to employment and will likely continue to do so. We are not convinced that the proposed federated model would resolve the issues that have been outlined.
9. Recreation Aotearoa is not opposed to a degree of consolidation and rationalisation in the ITP sphere, for the purpose of achieving a greater degree of financial sustainability. Prior to ROVE, there were clearly heavy duplication and competition between Polytechnics (marketing, enrolment systems, finance systems, HR systems etc), which was unhelpful.
10. However, it essential that these merged institutions maintain satellite campuses in Regional New Zealand, so as to not exacerbate the skills shortages and constraints that already exist there.
11. Recreation Aotearoa submits that any reforms of the funding system must focused on achieving financial sustainability of the ITPs, across the peaks and troughs of the economic/employment cycle. ITPs must have the infrastructure and resources to cope with high enrolment numbers during periods of high unemployment, but not be left 'high and dry' when enrolment falls in periods of economic prosperity.
12. Recreation Aotearoa values regional provision and the geographic contextualisation of learning. For example, it is important that qualifications in Outdoor Leadership can be contextualised by way of Sea-Kayaking in Nelson for, example, but also by rock-climbing in Christchurch. But regional provision should not come at the expense of national consistency. To the extent to which the proposed federated model supports this interest, we are supportive.

An industry-led system for standards-setting and industry training

13. In the pre-ROVE era, Recreation Aotearoa appreciated rapid feedback loop that existed between industry and the ITOs, as well as the industry expertise of the ITO staff. This meant that ITOs could rapidly develop new training and qualifications or alter existing ones. In many respects, this ability was replicated by the WDCs that were established by way of ROVE. It is essential that this Kaupapa is retained in any new model.

14. Recreation Aotearoa submits that both proposals are similar in nature, the material difference being that under Proposal 2, the organisations would be limited to standard-setting.
15. It is our view that the ideal model has three facets (a) Strong industry leadership and employer engagement; (b) The separation of qualification development and qualification delivery; and (c) a well-structured and consistent system of reviewing qualifications.
16. Recreation Aotearoa submits its support for industry-primacy in the role of standard setting and the design of qualifications for industry. The functions of reviewing qualifications, evolving qualifications, moderation and new qualification development, needs to be held as close to industry as possible. Governance should be led by the industry with broad representation to ensure boards accurately reflect the needs of their sectors.
17. Any reform must ensure that work-based learning is adequately catered-for and incentivised, to ensure its viability against competition from the Polytechnics. In recent years, we have observed improvements in many facets of work-based learning, including learning support and pastoral care, developing employer capability, and the provision of learning and assessment materials.
18. We submit our concern that the proposals do not adequately account for the risk that Polytechnics may play a much larger role in work-based learning, at the expense and possible exclusion of existing providers, such as Te Mahi Ako, for example.
19. Recreation Aotearoa has observed a strong preference from our members that the role of standards-setting in vocational education and training, should never be assigned to the New Zealand Qualifications Authority (NZQA). There is a strong aversion to this course of action.
20. Regardless of which proposal is taken up, Recreation Aotearoa wishes to express its discomfort with the possible structures and how sectors are combined. We support the submission for Skills Active Aotearoa and their call for the establishment of a dedicated standard-setting body specifically for the active recreation, leisure, and entertainment sectors. Combined these sectors represent a significant portion of GDP, a large workforce and an outsized value brought about by its volunteer workforce and non-profit components.

A funding system that supports stronger vocational education

21. Recreation Aotearoa submits that funding inequities and unintended incentives have resulted in inefficient use of funding, duplication and unnecessary competition. This problem existed prior to ROVE.
22. We agree that the newly introduced has the unintended consequence of increasing the profitability of the already profitable work-based delivery but depleted the viability of the already financially challenged provider-based education across the system.
23. Recreation Aotearoa submits that any reforms of the funding system must resist the temptation to enhance the financial sustainability of the Polytechnics, by cannibalising the financial strengths and efficiencies of work-based delivery or Private Training Establishments (PTEs). Funding reforms must ensure flexibility and nimbleness in delivery of training to be able to quickly and effectively meet industry's changing needs.
24. Consistent with our position expressed in paragraph 15 above, we submit that qualification-setting bodies must be funded independent of qualification delivery.
25. In addition to what has been outlined in the proposals, Recreation Aotearoa wish to submit its concern that the role of the Tertiary Education Commission is not adequately considered. In recent years, Recreation Aotearoa has gone to significant lengths to provide data and advice to Toi Mai (our relevant WDC), in order to support its function of providing advice to TEC. However, we have been concerned that the advice provided to TEC has not resulted in the necessary funding of qualifications, important to our sector.
26. To be more specific, we have for many years, raised the issue that the cost of delivering relatively expensive and low-volume, but high value qualifications such as Outdoor Leadership or Aquatics. Over the last decade, Polytechnics have reduced the provision of Outdoors qualification suite or stopped altogether. The outdoor education, outdoor recreation and aquatics sector require skilled and qualified staff to effectively reduce or prevent the risk of injuries and fatalities. This requirement goes beyond what is indicated by wages/salaries in these sectors or number of learners pursuing these qualifications.
27. Recreation Aotearoa submits its concern that the funding proposals do not adequately address this issue or make TEC accountable for the decisions its makes.

28. Recreation Aotearoa submits its support for the maintenance of targeted support for underserved learners, particularly Māori and Pasifika and learners with disabilities.