

Submission on the Education and Training (Vocational Education and Training System) Amendment Bill

June 2025

Submitter details

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Submission

Introduction

1. Recreation Aotearoa is a registered charity, and the organisation 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. The Recreation Aotearoa membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation providers, and others involved in the delivery of recreation throughout New Zealand.
3. Our mission is enhancing wellbeing through recreation.
4. Recreation Aotearoa believes recreation is vital to New Zealand society. Recreation is not just about enjoyment. It is about being healthy, engaged and stimulated, having fun, and interacting with others, whether through outdoor recreation, community recreation, or aquatic and facility-based recreation. Recreation is a major contributor to the physical and mental health of individuals, and to the resilience of our communities.
5. The numerous benefits of recreation for New Zealand are reliant on a skilled, qualified, and connected recreation workforce. We have consistently observed that skills and workforce shortages in our sector have dramatic negative impacts on the wellbeing of New Zealanders. Ensuring that New Zealand's recreation opportunities remain among the world's best requires a greater understanding of these benefits and how laws and regulations influence recreation delivery.

General Comments

6. Recreation Aotearoa supports the intent of this Bill to create a unified and cohesive vocational education and training system. We acknowledge that the previous system, and indeed the current one, has various flaws, distorted

incentives, inefficiencies, and blind spots that do not adequately serve the recreation sector.

7. We accept that financial sustainability issues within the Polytechnic sector need to be resolved, often due to the counter-cyclical nature of enrolments. While we are not opposed to a degree of consolidation and rationalisation to achieve greater financial sustainability, given past duplication and competition between Polytechnics, we caution against reforms that disestablish successful elements of the current system. It is essential that merged institutions maintain satellite campuses in regional New Zealand to avoid exacerbating existing skills shortages and constraints. Regional provision and the geographic contextualisation of learning are highly valued by our sector. For example, contextualising Outdoor Leadership qualifications by way of sea-kayaking in Nelson or rock-climbing in Christchurch, while maintaining national consistency.
8. We advocate for an industry-led system for standards-setting and industry training. The functions of reviewing, evolving, moderating, and developing new qualifications must be held as close to industry as possible. Governance should be industry-led with broad representation that accurately reflects sector needs. We firmly believe in the separation of qualification development and qualification delivery. This ensures that industry priorities drive standards while delivery mechanisms remain agile.
9. A significant concern for Recreation Aotearoa is the potential for Polytechnics to play a much larger role in work-based learning, possibly at the expense and exclusion of existing successful providers, such as Te Mahi Ako. We have observed strong opposition from our members to the New Zealand Qualifications Authority (NZQA) being assigned the role of standards-setting in vocational education and training. We also strongly support the call from various stakeholders for the establishment of a dedicated standard-setting body specifically for the active recreation, leisure, and entertainment sectors.
10. Regarding funding, we have consistently submitted that inequities and unintended incentives in the current system lead to inefficient use of funds, duplication, and unnecessary competition. Any funding reforms must resist the temptation to enhance the financial sustainability of Polytechnics by cannibalising the financial strengths and efficiencies of work-based delivery or Private Training Establishments (PTEs). Funding models must ensure

flexibility and nimbleness in training delivery to meet industry's changing needs quickly and effectively.

11. We have deep concerns regarding the role of the Tertiary Education Commission (TEC) and its accountability, particularly concerning funding decisions for relatively expensive, low-volume, but high-value qualifications such as Outdoor Leadership or Aquatics. Despite significant efforts to provide data and advice to our relevant Workforce Development Council (WDC), Toi Mai, we are concerned that this advice has not resulted in the necessary funding for qualifications crucial to our sector. Over the last decade, many Polytechnics have reduced or ceased the provision of outdoor qualification suites due to viability issues. The outdoor education, outdoor recreation, and aquatics sectors require skilled and qualified staff to effectively reduce or prevent the risk of injuries and fatalities, a requirement that transcends wages or learner numbers. We urge that the Bill adequately addresses this issue and make TEC accountable for its decisions.

Feedback in Detail

Proposed Industry Skills Boards (ISBs)

12. The Bill proposes replacing WDCs with new Industry Skills Boards (ISBs) which will manage standards-setting for vocational education and training. Their functions include developing qualifications and standards, quality assurance, endorsing programmes, and providing investment advice to the TEC. We note the Bill also permits ISBs to charge fees for quality assurance and collect industry levies.
13. Recreation Aotearoa shares the concerns expressed by others, regarding the proposed "Service Industries ISB". The vast size and diversity of industries it encompasses, including financial services, snow sports, security, real estate, and tourism, raise significant risks that the specific needs of smaller sectors, such as outdoor recreation or Aquatics, may be overlooked. We urge the Committee to ensure that each ISB is sufficiently sized and funded to adequately cover its diverse mandate, ensuring all sectors within it have a strong industry voice and influence.

14. We echo Toi Mai's concern regarding the Bill's rigid requirement for all ISBs to have eight members. As Toi Mai notes, this can be "top-heavy" for a total spend of \$30 million across seven ISBs and may not suit all industries. We recommend amending the Bill to allow for flexibility, such as "An industry skills board may have up to 8 members, to enable new boards to adapt to variations in industry groupings over time.
15. Recreation Aotearoa wishes to use this opportunity to make the Committee aware of the fatigue with the constant changes in the vocational education and training sector, and advocate for the continuity of it's successful elements. Furthermore, we are concerned about the apparently highly constrained funding arrangements for ISBs. There is a need for more detailed fiscal information to properly assess the viability of the reforms. The lack of clear information on costs and system improvements undermines confidence in the proposed model.

Funding and Qualification Issues

16. Recreation Aotearoa submits that the proposed Bill will not resolve the urgent crisis facing Outdoor Instructor Qualifications. The indefinite suspension of the Trades funding category review leaves the critical issue of misclassification unresolved, with no pathway for resolution. Outdoor Instructor Qualifications are currently classified under Category #03 (Humanities and Social Sciences), which provides significantly lower funding than the appropriate Category #22 (Trades).
17. This underfunding has severe consequences. Te Mahi Ako, historically the sole provider of these qualifications in various forms, has ceased delivery due to unsustainability. If AdventureWorks is also forced to withdraw, there will be no remaining provider of NZQA-aligned Outdoor Instructor Strand qualifications in New Zealand. This directly contradicts the increasing need for formally trained outdoor instructors, particularly in light of recent high-profile outdoor safety failures. It is unacceptable that this vital training is funded at a significantly lower rate than other trades like hairdressing, cleaning, and food processing. The Bill should be amended to prevent this type of misclassification.

18. Recreation Aotearoa holds the view that the formal vocational education and training system is not fit for purpose for newer and more dynamic industries, including creative, digital technology, and outdoor recreation. The system, designed for "legacy" industries and traditional trades, is slow and unresponsive. It can take years to develop and deliver a qualification, meaning technology and society evolves faster than training can be provided.
19. Recreation Aotearoa submits that the current volume-based funding model incentivises providers to offer longer, class-based courses, even when industries prefer shorter, work-based learning. This means that qualifications critical to industry growth and national priorities, like outdoor recreation, may not be offered if they do not attract sufficient funding to make them viable. This inherent tension in the system between industry needs and provider viability is not adequately addressed by the Bill, limiting its effectiveness.
20. Recreation Aotearoa submits its concern that the Bill's current framing of apprenticeships, primarily through employment agreements, risks excluding workers in non-traditional employment models, such as the self-employed or contractors. Many in the outdoor recreation sector operate outside traditional employer-employee relationships. We recommend amending the language around apprenticeships to ensure all models of employment and work can access work-based learning provisions offered by industry skills boards.

Recreation Aotearoa looks forward to discussing our submission during oral hearings.