

3 April 2019

Via email to: vocationaleducation.reform@education.govt.nz

Submission on Reform of Vocational Education

Introduction

1. Social Service Providers Aotearoa (SSPA) is the New Zealand peak body for government-funded community-based providers working with children, young people, families, and communities. With a membership of some 200 social service providers nationwide, SSPA represents an approximate collective capacity of 6500 staff and 5000 volunteers providing essential services to children, families and communities throughout New Zealand.
2. Our members work with the most vulnerable children and families in New Zealand and those families rely on being able to access skilled, knowledgeable and capable practitioners in the services they seek assistance from. SSPA as the peak body has a strong focus on supporting the capability and capacity of the community social services provider sector and is partially funded by government to carry out a range of activities to this end. SSPA has a longstanding and positive working relationship with Careerforce, the ITO for our sector. We are also engaged with a number of workforce initiatives (see para 3 below). As such, we have a strong interest in the plans to strengthen the vocational education and training system.
3. We are currently participating in several initiatives aimed at strengthening the current and future workforce in our sector:
 - a. A community social services workforce plan being developed by Careerforce
 - b. A Workforce Working Group recently established by Oranga Tamariki (OT) to respond to pressures in the NGO sector arising both from the Oranga Tamariki pay equity settlement and from changes to OT's operating model which, *inter alia*, will require a significant number of additional social workers in both the statutory and community sectors
 - c. Work with the Social Workers Registration Board to implement the changes required as a result of moving to a mandatory registration regime
 - d. The Ministry of Social Development is beginning some work on workforce planning for social workers.
 - e. We are also aware of workforce planning as part of the work of the Joint Venture for sexual violence and family violence services.

Response to Consultation Discussion Document

Inadequacy of the process and timeframe for consultation

4. With a short timeframe for consultation, we have focused on responding to key points for our sector arising from the Consultation Discussion Document and the technical discussion document on roles of providers and industry bodies. The short timeframe, the lack of data and unclear rationales for proposals make it difficult to respond in detail. It is disappointing that such a major review and potential restructuring of the vocational education sector is being done with insufficient consultation.
5. This concern is compounded by the extent of change already being experienced in our sector as the result of the implementation of the legislative and operating changes to Oranga Tamariki which is generating a significant level of change for the contracted provider sector. SSPA supports the changes Oranga Tamariki is making, notwithstanding the challenges, and has a shared view with Oranga Tamariki that a skilled and competent workforce is required to deliver the best possible outcomes for children and their

families. A major change to the vocational education and training system at the same time adds a layer of complexity and potential disruption. We suggest further consultation is needed to ensure both sets of changes are effective and support rather than hinder each other.

6. We encourage the decision makers to take the time needed to engage more fully and to carefully consider the implications of the proposed changes for all areas of the workforce. In particular, as the discussion document does not provide any sense that our sector is recognised or understood, we request specific engagement to remedy this before changes are agreed (see paras 12 and 13 below).

Unclear boundaries with social work

7. We note that the vocational area of social work does not appear to be in scope for this review, along with other professional/vocational occupations. This creates some difficulty in responding to the review, given the workforce in the community social services sector is significantly multidisciplinary and team-based, and includes social workers. It is difficult to consider broad workforce issues while a significant occupational group is deemed to be out of scope.
8. We are concerned that the removal of the role of arranging workplace training, currently provided by the ITO, will create vague boundaries in our sector. For example, with social worker training being undertaken by one part of the tertiary system, and vocational education undertaken in another part, therefore impacting on the ability for workers to pathway into registered roles that the sector requires. We recommend further consultation on this point, to include the Social Workers Registration Board and the ANZ Association of Social Workers, along with SSPA.

Unclear rationale for proposed changes to the ITO sector

9. We have not framed this submission around the feedback questions listed, but instead want to ensure that the particular characteristics of the community sector are clearly understood in this context, and the implications and potential benefits of the proposals. Our main focus is on the industry bodies, rather than the polytechnic sector.
10. Our most immediate concern is for the potential disruption to existing programmes delivered through the Industry Training Organisations. As noted above, Careerforce is working constructively with our organisation and is taking a much-needed lead on workforce planning in our sector. There appears to be a clear intent to disestablish the ITOs, with consequent disruption to their programmes, likely loss of skills and knowledge, and potential negative impact on current and intending learners. We have a particular concern that Careerforce may be very negatively impacted by the proposed transition, as it does not have a strong 'industry' to support it. Our sector is unable to absorb the fiscal implications of the changes proposed and we have a concern that this may lead to a loss of engagement, a loss of workforce capability and may, in the worst case, impact on the sustainability of providers.
11. There is insufficient information to comment on whether the proposed Industry Skills Bodies will be an improvement on the ITO model, and we ask for consideration of the following points:
 - a. SSPA understands the rationale for a review of the role of the ITPs in the vocational education sector. There are clearly fiscal problems affecting the polytechnics in particular which appear to have prompted this review, but the case to include the ITOs within the review scope is not clear.
 - b. The community sector will not be in a position to fund its own industry skills body. The sector is chronically under-funded and reliant on government funding. In effect, most community social services are delivered on behalf of the State and funded through appropriations. If there is to be a community-focused ISB, the Crown will need to provide the funding to enable it to operate. This may be a different model to other industries such as

construction or viticulture, and we urge any new model to be implemented with sufficient flexibility to enable different approaches.

- c. It is not clear what weight will be given to the advice on investment priorities by the ISBs. It appears that, ultimately, the Tertiary Education Commission will make the decisions within its appropriations. This does not give us confidence that the needs of the community sector will be adequately recognised and supported. The TEC does not have strong connections to our sector and we do not have confidence in their understanding of our particular workplace and workforce landscape.

Potential for a community sector ISB

12. While the proposals overall pose significant changes and we have outlined some reservations, there is also an opportunity to create a set of mechanisms that will support the wider community sector to thrive, drawing on existing positive factors. A community ISB could be established, which would need, at minimum, the following to be successful:
 - Crown funding to support its operations
 - All aspects of the 'industries' operating in the community sector to be represented, including employers, training providers, workers and their representatives, to ensure advice provided on investment reflects a full range of issues and perspectives within the sector
 - A qualifications and learning framework with a focus on a broad foundation of the required skills together with recognition of the many and varied specialist areas requiring specialist qualifications
 - Clear interfaces with the related professional bodies (such as counsellors, social workers, psychologists) to facilitate career pathways
 - Support for community sector agencies to provide well-supported workplace learning.
13. We request that the Ministry undertake specific engagement with the community sector about the impact of the proposals and the potential to establish a community sector ISB. The main national bodies and networks in the community sector meet through ComVoices, which is a useful vehicle able to facilitate consultation. This Review has been a recent topic of discussion at ComVoices' meetings and its members are happy to engage further. The contact for them is admin@comvoices.org.nz

In summary

SSPA does not feel that the case for change across the whole vocational education sector has been made in the consultation document. The proposed changes should look to address the structural deficiencies of the ITP sector, without causing disruption to other parts of the vocational education sector that **are** working well.

SSPA requires a clear, segmented model be created so that both employers and learners are able to easily navigate the system without the confusion of competition between different providers or an overly-complex system for the provision of advice on priorities for investment.

SSPA, along with other community sector national network and peak bodies, wishes to engage constructively to ensure that any changes to the vocational education and training system benefits our sector and helps create a capable workforce able to respond to changing social and demographic conditions. SSPA welcomes the opportunity to make a verbal submission on the matters raised in this submission and in particular to consider the establishment of a community sector ISB, if the decision is made to proceed with this model.

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