

4 April 2019

Consultation on the Reform of Vocational Education

We are pleased to provide comment to the Tertiary Education Commission on the proposed reform of vocational education and training.

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand is a national organisation that promotes high-quality early childhood education (ECE) through initial teacher education, professional development, leadership programmes, advocacy and membership services.

Te Rito Maioha is a membership organisation. We represent early childhood education services and the teachers who provide education and care to thousands of infants, toddlers and young children. Our members are drawn from a diverse range of community-based and privately-owned education and care services, home-based services and kindergartens.

Te Rito Maioha is also one of New Zealand's top providers of initial teacher education for ECE teachers, and is recognised as a leader in bicultural teacher education. A private training establishment (PTE), we deliver a suite of qualifications and teacher education and professional development programmes that are of interest to both domestic and international students.

Commentary

Impact of the reforms on teacher education

We consider that one of the key weaknesses of this proposal is that it hinges on a concept that is not defined in legislation; vocational education and training is absent from the Education Act 1989.

We note, however, that the consultation discussion document (page 10) provides its own broad definition:

“For this work, vocational education is defined as:

- All industry training (training and apprenticeships people undertake in employment); and
- Provider-based education at levels 3-7 of the New Zealand Qualifications Framework, excluding:
 - Degree study;
 - Te Reo and Tikanga Māori;
 - English for Speakers of Other Languages;
 - Any university provision; and
 - Other non-formal provision.”

We consider some nuancing of this definition would be appropriate, to take into account the types of industries and occupations that these providers cater for.

The consultation's focus is on vocational education qualifications that are primarily New Zealand Certificates and Diplomas. We are concerned this might create issues for providers like us that offer education programmes across the full qualification range. As a PTE we deliver ECE qualifications from Level 5 to Level 9. Our qualifications are approved by the New Zealand Qualifications Authority (NZQA), who also monitors our performance as part of its regular External Evaluation and Review process. The quality of our provision is evidenced by our NZQA Category One status.



Our student enrolment processes and our programme content are designed and delivered in keeping with the *Code of Professional Responsibility and Standards for the Teaching Profession*, as set out by The Teaching Council of Aotearoa New Zealand | Matatū Aotearoa, the professional body for the New Zealand teaching profession.

While most of our courses sit at or above the Level 7 threshold for exclusion from the scope of this reform, we do have three Level 5 diploma programmes that focus on ECE as a profession. For example, we are currently developing a Level 5 diploma for home-based ECE, in response to demand from the sector and minimum qualification requirements for home-based educators that are soon to be executed by the government.

We would like to better understand to what extent the proposed reforms will impact these programmes as they are not defined as VET. Under the new regime, which body or bodies will have oversight of and influence over what we deliver? Who will be the industry skills body for teaching? The Teaching Council?

Work-based learning

The proposal suggests that greater alignment is required between providers and work-based learning. Many of our programmes, such as our Level 5 programme, include a work-based component and most of our students work full or part-time in ECE, where theory is closely integrated with practice, as is proposed in the reforms. Education delivery is predominantly online for the Level 5 programmes. We are regularly in contact with employers and our approval bodies, such as NZQA, who recognise and endorse our relationship with our external stakeholders such as early childhood education employers.

Improved learning outcomes for Māori and Pasifika

The consultation document states that the reforms are intended to improve outcomes for Māori, Pacific, the disabled, and those with learning needs (page 13). As a bicultural organisation, we serve the needs of a high proportion of Māori and Pasifika learners (and second chance learners), so we fully support initiatives that will improve outcomes for these groups. However, there is limited evidence that a single provider, such as that proposed in the reform document, would benefit Māori, Pasifika and second chance learners in the same way that our programmes do.

Impact on funding

We are concerned that the reform could influence changes in tertiary funding, which may have a knock-on negative impact on PTEs like ours that provide professional (not vocational) education at Level 5 and above. We receive Student Achievement Component funding from the Tertiary Education Commission. We think it is a failing of the consultation document that funding proposals for the new regime have not been articulated and supported by Treasury. How can we provide informed comment, without knowing what the government is thinking?

Misplaced power?

Industry leadership is a key rationale for the changes, but it seems the reforms will increase the power of central government, while the potential for industry power is still to be defined. While the TEC “must have regard to” the advice of the proposed industry skills bodies, that is not a strong condition. Similarly, approval of qualifications is “alongside NZQA”. Our question is, will the industry skills bodies have the same powers as major professional bodies, or more like those of existing ITOs?

Recommendation for exemption

We strongly urge the government to consider exempting teacher education providers from this reform from Level 5 and above. Teaching is regarded as a profession, not as vocation or trade. While most teacher education occurs in universities, for the handful of PTEs who provide ECE teacher education programmes, these reforms could have a damaging effect on their ability to deliver the range of programmes needed and achieve the same high standard of programme outcomes. This will also have an impact on achieving outcomes for the teaching workforce and delivering the objectives of the Early Learning Strategic Plan.

We also recommend that the government provide Te Rito Maioha Other Tertiary Education Provider (OTEP) status, due to our longstanding involvement in lifting quality in the ECE sector and our not-for-profit status. This enabled the TEC to fund us at the same level as universities and ITPs. With the Minister of Education's mandate to lift quality in ECE, this position would demonstrate unequivocally the government's commitment to attracting students into ECE teaching and meeting the outcomes of 80-100% qualified ECE teaching workforce.

Overall, we think the government has cast its net too widely by including all non-universities in these reforms, when the majority of the issues that need fixing sit with the ITPs.

Submission by 5 April 2019: VocationalEducation.Reform@education.govt.nz

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