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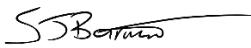
Hon Penny Simmonds
Minister for Tertiary Education and Skills

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Submission: Proposed changes to the Vocational Education and Training (VET) system

This submission is made on behalf of the membership of the Association of Emergency Care Training Providers (AECTP). It is made in good faith in my role as Chair of the AECTP.

Please contact the AECTP NZ Executive Officer at the email address provided below for any further information regarding this submission.



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Chair

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ASSOCIATION OF EMERGENCY CARE TRAINING PROVIDERS INC

Promoting quality in emergency care training

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Submission: Proposed changes to the Vocational Education and Training (VET) system

The Association of Emergency Care Training Providers (AECTP)

The Association of Emergency Care Training Providers, also known as AECTP, was formed in 2011 from a desire to drive quality first aid training across New Zealand. Currently the AECTP has over 20 members, including Private Training Establishments (PTEs), Institutes of Technology and Polytechnics, and schools. The PTEs represented by the AECTP (in this submission referred to as 'First Aid PTEs') comprise approximately 80% of NZQA accredited first aid training providers. First Aid PTE provide first aid training to a wide range of industries, education organisations, and communities. Some First Aid PTEs operate on a national scale, while others operate regionally.

The AECTP Board consists of eight member representatives, comprising two appointed by New Zealand Red Cross, two appointed by Hato Hone St John, and four elected from the independent member organisations by the AECTP membership.

Since 2014 the AECTP has been recognised by NZQA as a "Peak Body" representing the first aid training industry. We work collaboratively within our membership and with external stakeholders, including NZQA, Toitū te Waiora, Tertiary Education Commission and WorkSafe to strengthen quality of and confidence in the emergency care training sector and improve first aid treatment and survival outcomes across Aotearoa New Zealand.

Submission

Introduction

The AECTP understands that the proposed changes reflect changes in objectives and priorities under the current Government, specifically that the Government places a significantly higher priority on local and regional responsiveness and has concerns about the efficiency, cost effectiveness and complexity of the current system.

The Government's objectives are most specifically described by the Hon Penny Simmonds in the Ministerial Foreword as follows:

A successful vocational education system must be financially viable, academically rigorous, founded on strong and enduring industry engagement and community connections within its local region. To do this it must follow the principles of enabling choice and flexibility, encouraging innovation, being cost effective for industry and government, maximising the potential of all students, and driving economic growth.

The proposal identifies that a strong vocational education system works with the strengths of different organisations. The AECTP supports the recognition of private training providers as important components of the vocational education system.

The proposal includes three main design decisions that are key to any reform of the vocational education and training system:

- Decision 1: The structure of the ITP system
- Decision 2: The delivery of work-based learning (WBL)
- Decision 3: Industry standard-setting and skills leadership

Only Decision 3 is directly relevant to First Aid PTE and therefore is the focus of this submission.

The specific proposals presented in the consultation document provide limited specifics on matters relevant to First Aid PTEs (or PTEs in general) and we therefore do not have the necessary information to select an overall preferred option. For the same reason, we are not able to provide responses to some of the specific feedback questions asked in the consultation document.

We provide feedback on the proposed changes under the following structure:

- Unique characteristics of first aid education relevant to the proposed changes;
- Lessons drawn from the past and current education and training systems; and
- Responses to selected feedback questions relevant to First Aid PTE we are able to respond to with the information available.

Unique characteristics of first aid education relevant to the proposed changes

First aid education has some unique characteristics that are different to many, if not all, other education providers. These are:

1. Meeting learner needs related to health and safety requires standardisation and national consistency in first aid training

For the majority of learners, first aid education is not a step on an educational pathway to employment but instead a health and safety compliance requirement for their employment. We estimate that 85% of learners attend first aid training to meet their 2-yearly compliance training. We estimate that only 10% of learners attend first aid training as part of their education pathway, for example, to obtain NZQA unit standard credits towards their NCEA qualifications or a tertiary qualification. Most remaining learners complete first aid training for personal reasons.

Because of the health and safety compliance-focus, there is less opportunity for choice, flexibility, and innovation in course content for First Aid PTE compared to other education providers. In fact, standardisation of content and national consistency of content and quality are critical for meeting learner and employer needs. This is reflected in the strategic goals of the AECTP to:

Enhance the quality of first aid training in New Zealand through standardisation of course content and promotion of NZQA accredited training providers, ensuring consistency and excellence across New Zealand

2. Meeting learner and employer needs requires engagement with a wide range of industries on a national scale

Employers require their staff to receive first aid training that meets their industry needs. All workplaces require some staff to be first aid trained and the first aid education sector therefore engages with stakeholders from a wide range of industries. The needs of businesses in an industry are comparable throughout the country and for that reason there is no need for industry-level engagement to be local. In fact, there are clear benefits of national consistency and cost-efficiencies for both industry and the first aid education sector in conducting industry engagement on a national scale. Importantly, it would create considerably confusion and unnecessary cost for industry to engage with the first aid education sector on a regional scale.

Tailoring of flexible aspects of first aid courses, such as delivery or application to specific scenarios, to individual employer needs is routinely done by individual First Aid PTEs. There would be no benefit to industry or First Aid PTEs to have local or regional standard-setting bodies to engage with industry on that scale as such tailoring is specific to individual businesses.

3. Maximising learning outcomes and responding to diverse needs of learners is most effective if approached on a national scale

Learners attending first aid training are employed in a wide variety of occupations and have a wide range of cultural, educational, and societal backgrounds. Learners attending first aid training in all parts of New Zealand therefore reflect a cross-section of New Zealand society.

For this reason, there is no need to address specific learner needs on a local scale. In fact, there are clear benefits in consistently strengthening the ability of trainers to respond to diverse learner needs on a national scale. Benefits arise, for example, through the efficient use of resources and access to experts in education and first aid delivery.

The AECTP is playing a leading role in driving positive change within our sector, which is represented in our strategic goal to:

Strategically position ourselves as a leading voice in the industry through proactive thought leadership, contribution of subject matter expertise to initiatives, strategic partnerships, and targeted advocacy efforts, effectively shaping conversations and driving positive change within our sector

4. The uniqueness of the first aid education sector requires an effective working relationship with the standards-setting body

As a consequence of the unique characteristics of the first aid education sector, it is critical for our sector to have a standards-setting body that recognises the uniqueness of our sector and is willing and able to develop and maintain an effective working relationship.

The AECTP is the leading voice of the first aid sector and has a track record of working constructively with NZQA and standards-setting bodies. Our experiences working with the ITO The Skills Organisation and with the WDC Toitū te Waiora differed substantially in this regard. In the following section we describe some of these experiences and provide feedback on the proposal based on the lessons learnt.

5. Funding

The First Aid sector, and AECTP as the peak body, currently receives no funding for both training delivery and for playing an active role in standard setting.

Lessons drawn from the past and current education and training systems

The initial standards-setting body for the first aid sector was NZQA, which handed over the responsibility to The Skills Organisation Industry Training Organisation (Skills ITO) in 2015. Since the previous reform of vocational education, the first aid training has been the responsibility of Workforce Development Council (WDC) Toitū te Waiora.

Working with these three different standards-setting bodies in relatively recent times (past ten years) provided us with relevant experience and learnings to feed into the current reforms. Here we briefly summarise some key features of working with NZQA, Skills ITO, and Toitū te Waiora.

Working with NZQA

NZQA, as the standards-setting body, faced challenges in fully appreciating the specific needs of the first aid sector, including the unique nature of short courses and the importance of workplace compliance. While AECTP and the wider sector provided constructive feedback, NZQA's approach did not always reflect the concerns raised, which made it difficult for the industry to make meaningful progress in advancing outcomes for learners, workplaces, and the sector as a whole.

Since the standards-setting responsibilities have shifted, we have seen improvements in our relationship with NZQA. However, ongoing challenges remain, such as limited familiarity with the first aid sector's nuances, some internal procedural rigidity, and frequent staff changes, which have complicated efforts to develop a fully effective working partnership.

Given these experiences, we remain cautious about the prospect of reverting standards-setting responsibilities to NZQA and its alignment with the objectives of the VET system reforms. While progress has been made, concerns remain about the ability to establish a relationship that supports

key principles such as choice, flexibility, innovation, cost-effectiveness, student success, and economic growth.

Working with the Skills ITO

The relationship with Skills ITO began positively with a productive meeting in January 2018 to discuss updates to the NZQA unit standards 6400 series (three first aid unit standards) and the First Aid as a Life Skill document, which outlines first aid training requirements.

Despite this strong start, Skills ITO subsequently took an approach that involved limited engagement with the sector. Many key decisions were made independently, without sufficient consultation with AECTP. Furthermore, AECTP was not included in discussions between Skills ITO and the New Zealand Resuscitation Council, an advisory body for resuscitation and first aid that, while important, does not hold regulatory responsibilities.

There were also challenges in meeting key requirements, such as adhering to the necessary timelines under Skills ITO's standards-setting responsibilities. It appeared that the priority was placed on their role as a training provider, and the standards-setting function seemed under-resourced.

This became particularly evident during the COVID-19 pandemic, when communication and decision-making processes lacked the clarity and transparency needed by the first aid industry. This resulted in confusion and inconsistency across the sector. During this challenging time, it appeared that Skills ITO faced difficulties in navigating these issues, potentially due to resourcing constraints and a lack of effective communication.

While we acknowledge that some of these challenges may have been specific to Skills ITO, concerns remain regarding the potential for conflicts of interest, misallocation of resources, and a lack of transparency within this model.

Working with TTW

With the introduction of the Workforce Development Council in 2021, Toitū Te Waiora, the AECTP became a recognised partner and was accepted by Toitū te Waiora as the NZQA-appointed Peak Body for the First Aid Industry. The relationship has been extremely positive, with both parties having the utmost respect for each other and working together for the betterment of the first aid Industry. Liaison between Toitū te Waiora and NZQA has included the AECTP in a timely manner with positive outcomes and continues to be this way.

The first aid industry's experience of working with Toitū te Waiora has been the most positive experience the industry has had in the past twenty years. Toitū te Waiora has taken an entirely different approach to engaging with the industry, importantly acknowledging that the AECTP are the industry experts and jointly working on initiatives, including developing a micro-credential, reviewing the First Aid as a Life Skill, and unit standard reviews that improved outcomes for learners and workplaces and consistency across the country.

It would be a serious setback to the first aid sector, learners and workplaces, if the relationship developed between the AECTP and Toitū te Waiora were to be dismantled or diminished by the proposed changes.

Conclusion

In conclusion, our experience with NZQA, Skills ITO, and Toitū te Waiora has highlighted the importance of working with a partner that is both willing and adequately resourced to engage effectively with the first aid sector. NZQA and Skills ITO faced challenges due to competing priorities

and inflexible systems, which hindered progress. In contrast, Toitū te Waioira has been a highly effective partner, fostering collaboration and industry improvements. To ensure continued success, it is vital that any future partnerships prioritise meaningful engagement and the specific needs of the sector, as we've achieved with Toitū te Waioira.

Responses to selected feedback questions

In this section we respond to feedback questions relevant to the first aid education sector.

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

- **Which option do you prefer overall? Why?**

2B is the preferred option, however the proposal does not provide us with sufficient information to fully endorse this.

Concerns relating to 2B

- I. If 2B was to progress, what assurance is provided to ensure that the current way of working with the standards-setting body and the relationship that has been created would be maintained?
- II. The First Aid Sector crosses over all industries, it does not fit neatly into an industry aligned standard setting body.

Benefits of 2B

- I. Independence of standard setting and delivery is important to avoid conflict of interest between ITB's arranging training and quality assurance roles that may arise under option 2A.
 - II. We have had a good experience with our working relationship with Toitū Te Wairoa.
- **What are the main features and functions that Industry Training Boards (Option A) need to be successful?**

AECTP does not support Option A

- **Under Option A, how important is it that ITBs and non-ITBs be able to arrange industry training? Why?**

AECTP does not support Option A

- **What are the main features and functions that industry standards setters (Option B) need to be successful?**
 - I. Ability and resourcing for working relationship with education sectors (in our instance AECTP)
 - II. Ability and resourcing to conduct stakeholder engagement, which, for first aid education sector, is broad.
- **Are there key features of the Workforce Development Councils that need to be retained in the new system?**
 - I. Consideration should be given to transitioning existing personnel from WDC's into roles that relate to existing relationships and sector understanding to ensure consistency and a smooth transition.
 - II. Funding and resourcing to enable effective working relationships and consultation.

Proposal 3: A funding system that supports stronger vocational education

- **How should standards-setting be funded to ensure a viable and high-quality system?**
 - I. **Outcome-based funding:** Funding should be linked to measurable outcomes, such as the relevance and quality of the standards developed, industry engagement, and the successful application of standards across the sector. This would ensure that standards-setting bodies remain focused on delivering results that benefit both learners and industries.
 - II. **Transparent budget allocation:** Standards-setting bodies should receive funding based on clear and transparent criteria, including the complexity of the sector, the number of stakeholders, and the need for frequent updates to standards. Regular reporting and audits should be required to ensure that funding is being used effectively and in line with expectations.
 - III. **Industry contribution:** Where appropriate, sectors that benefit from standards setting should contribute to funding through industry levies or contributions. This creates shared accountability between government, training bodies, and the industries they serve, ensuring that the funding model is both sustainable and aligned with industry needs.
 - IV. **Sector-specific reinvestment of NZQA revenue:** NZQA could allocate a portion of the revenue from NZQA unit standard credit reporting and annual fees back to the specific sectors that generate these fees, allowing for more direct benefits, such as updating standards, developing sector-specific training resources, or improving moderation services.

Concluding Questions

Are there any other ideas, models, or decisions for re-designing the vocational education system that the Government should consider?

The AECTP propose a hybrid standards-setting model for the first aid sector through a collaboration between NZQA, AECTP, and a newly assigned standards-setting body under Option 2B.

This would create a comprehensive and efficient system for developing, maintaining, and improving standards. Each organisation would play a critical role based on their unique strengths and functions, leading to a high-quality, efficient, and industry-driven approach to standards setting.

NZQA's Role

NZQA would continue to be acting as the overarching regulatory authority, responsible for maintaining the integrity of the National Qualifications Framework. Its role would involve:

- **Oversight and compliance:** Ensuring that the standards developed by the AECTP, and the formal standards-setting body meet the regulatory requirements and align with national qualifications.
- **Accreditation:** Granting accreditation to providers who wish to deliver unit standards and overseeing quality assurance processes such as moderation and EER.
- **Administration of unit standards:** Managing the processes related to the reporting of unit standards and ensuring they remain up to date with broader educational reforms and compliance requirements.

AECTP's Role

The AECTP, as the subject-matter experts and industry representatives, would take the lead in shaping the content of first aid unit standards, given their deep connection to the sector and experience with training providers. Their role would include:

- **Providing industry expertise:** Providing crucial insights into the practical needs and emerging trends within the first aid education sector and the needs of learners and workplaces. AECTP would be responsible for ensuring that the unit standards reflect first aid best practice, regulatory requirements, and learner needs.
- **Leading stakeholder engagement:** Acting as the primary liaison between the first aid education sector, industries requiring first aid training, and the standards-setting body, ensuring that the concerns and feedback from these stakeholders are heard and incorporated into unit standards. Engagement could include industry-specific research to ensure evidence-based decisions can be made.
- **Moderation and quality assurance implementation support:** Assisting in the quality assurance process by coordinating moderation activities among providers to ensure consistency in the delivery of first aid training based on the established standards. Also supporting NZQA EER processes by developing guidance for first aid provider self-assessment, including measuring tertiary education indicators.

Dedicated funding for the AECTP would be essential to enable the association to fulfil these responsibilities. Currently, the AECTP operates on voluntary contributions from member PTEs, which limits its capacity to contribute fully to the standards-setting process and take on additional responsibilities. Allocating formal funding would ensure that the AECTP is resourced to maintain high-quality engagement with stakeholders, and effectively carry out its role within this hybrid standards-setting model.

Industry Specific standard setting body

The industry specific standards-setting body, similar to Toitū te Waiora currently, would play a supportive but essential role in the collaboration by focusing on the regulatory and administrative aspects of standards development. Their responsibilities would include:

- **Standards development support:** Working with the AECTP to formalise standards, ensuring they meet the requirements of NZQA and the National Qualifications Framework. This could involve guiding the AECTP through the process of drafting, reviewing, and submitting unit standards.
- **Regulatory compliance:** Ensuring that the standards meet broader vocational education and training policies and align with the overall goals of the VET system reforms, such as fostering innovation and enabling learner success.
- **Funding and resource allocation:** Contributing necessary financial and logistical support to AECTP (depending on the level of funding available to AECTP), enabling the association to contribute effectively to the standards-setting process. This may involve contributing to the costs for industry consultations, research, and moderation activities.

Collaboration in a hybrid model

In this hybrid model, the three bodies—NZQA, AECTP, and the standards-setting body—would work together in a complementary fashion:

- **Co-development of standards:** AECTP would lead the development of standards with their sector-specific expertise, while the standards-setting body would ensure that these

standards align with the national qualifications framework. NZQA would provide oversight to guarantee the regulatory and quality requirements are met.

- **Funding and sustainability:** A portion of the fees from the reporting of NZQA unit standard credits by first aid providers, and/or additional dedicated funding, could be allocated to AECTP to support their role in standards setting. This would relieve the financial burden on voluntary contributions from PTEs and allow AECTP to focus on ensuring high-quality, relevant standards and the other critical roles under this model.
- **Accountability and quality assurance:** NZQA would ensure that all standards-setting activities comply with national quality assurance frameworks. Meanwhile, AECTP would provide industry-led moderation and feedback mechanisms, helping to maintain consistency and high standards across the sector.
- **Innovation and responsiveness:** AECTP, with its close ties to the industry, would be able to quickly identify the need for updates or new standards. The standards-setting body would facilitate the formal approval of these updates, and NZQA would ensure their integration into the national framework.
- **Ongoing engagement:** Through regular working groups, AECTP, NZQA, and the standards-setting body would ensure continuous feedback and collaboration, allowing for adaptive and responsive standards that evolve with the needs of the First Aid sector.
- **Shared authorship of first aid compliance documents:** AECTP, NZQA, and the standards-setting body would jointly update and maintain compliance documents, including the consent and moderation requirements (CMR) and the First Aid as a Life Skill (FALS) document. This would strengthen consistency in the implementation of compliance requirements and improve clarity and consistency for learners and workplaces.

By leveraging the strengths of NZQA, AECTP, and the standards-setting body in a hybrid model, the first aid sector would benefit from a standards-setting process that is both industry-driven and aligned with the National Qualifications Framework. Crucially, dedicated funding for AECTP is necessary to sustain this collaboration, enabling the association to fully engage in the process and ensure high-quality, relevant standards that meet the needs of the industry, learners, and workplaces. Additionally, funding and support would be required to reorientate AECTP's current structure, allowing the organisation to adapt and facilitate these changes effectively. By supporting processes such as moderation and EER and improving consistency among and quality of first aid providers through additional responsibilities assigned to the AECTP, we are confident that NZQA's costs associated with first aid providers would be considerably reduced. The proposed model of re-directing existing NZQA revenue to the AECTP may therefore become cost-neutral over time as the benefits of the hybrid model are realised.

In our opinion and based on our experience working under three different standards-setting models, this approach has the greatest chance of ensuring that first aid training is high quality, responsive to industry needs and changes, and sustainable. We believe that this proposed model is the best way of achieving the government's objectives of a successful first aid education sector that is financially viable, academically rigorous, founded on strong and enduring industry engagement and community connections, encourages innovation, is cost effective for industry and government, maximises the potential of all students, and drives economic growth.

Conclusion

In conclusion, the Association of Emergency Care Training Providers (AECTP) acknowledges the importance of the proposed changes to the Vocational Education and Training (VET) system and

values the opportunity to contribute to this discussion. Our submission emphasises the unique characteristics of the first aid education sector, particularly the need for national consistency, standardisation, and effective industry engagement to meet the diverse needs of learners and employers across New Zealand.

While we express support for Option 2B, we do so with reservations. Our concerns centre on ensuring that the strong and effective working relationship we have developed with Toitū te Waiora is preserved and that the unique nature of the first aid sector, which does not align neatly with industry-based standard-setting bodies, is fully recognised. We believe that national consistency is crucial for the first aid sector, and this must be a key consideration moving forward.

In light of these concerns and our experience working under three different standards-setting models, we propose a hybrid standard-setting model, where AECTP, NZQA, and a dedicated standards-setting body work collaboratively. This model would combine the strengths of each organisation, ensuring that processes remain industry-driven and aligned with the National Qualifications Frameworks.

For this approach to be effective, it is essential that AECTP receives dedicated funding to support our expanded role in standards-setting. Currently, our reliance on voluntary contributions from member PTEs limits our capacity to fully engage in the process and deliver the high-quality outcomes required. By supporting NZQA quality assurance processes and the quality of first aid providers through additional responsibilities assigned to the AECTP, we are confident that NZQA's costs associated with first aid providers would be considerably reduced. Our proposed model of re-directing some of the existing NZQA revenue from first aid providers to the AECTP may therefore become cost-neutral over time as the benefits of the hybrid model are realised.

The proposed hybrid standards-setting model would enable AECTP to restructure and take on the proposed additional responsibilities, thus ensuring that we can continue to lead the development of first aid standards that meet both industry needs and regulatory requirements. This approach would not only preserve the quality and consistency of first aid training but also support a system that remains responsive to industry changes, is sustainable, and maximises student outcomes.

We remain committed to working with the government, NZQA, and other stakeholders to ensure the ongoing success of the first aid education sector within New Zealand's evolving vocational education system.