



NZARBTM
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Reform of the Vocational Education in New Zealand

Response Summary

New Zealand Arboricultural Association

Date: 2 April 2019

The New Zealand Arboricultural Association (NZ Arb) was established in 1989 in response to increasing demand for a national body to represent industry professionals involved in the New Zealand tree care and the tree industry.

NZ Arb represents more than 280 companies varying in size from sole traders to international companies of more than 600 staff. We encourage continuous improvement and are open to reform of vocational education, as long as the impact of that reform is to stabilise and enhance what is currently provided.

The arboriculture industry relies heavily on workplace training in addition to full-time study. Any reform must not be at the expense of industry-led workplace learning, and it must work for both the employed workforce and industry participants.

Structure and reach of the industry

The arboriculture industry directly contributes towards economic and environmental resilience across New Zealand by working together with electrical utility providers, infrastructure managers, central and local Government, and commercial and individual property owners to help them manage their tree assets.

The industry predominantly consists of commercial contracting companies carrying out physical tree work on a varying scale, but also includes in-house teams from councils and electrical utility companies, consultancy businesses, training establishments, and education providers. The scope of services provided by these participants to the various industry sectors and clients is broad and its success relies on a robust and fit-for-purpose vocational education training system.

Commercial arboriculture consists of three tiers.

Tier 1: large-scale vegetation management businesses in partnership with utility companies and government agencies employing between 50 and 1000 staff nationally.

Tier 2: regional businesses and in-house council and utility teams employing 10 to 50 people.

Tier 3: includes individual contractors and small-business owners which represent 89% of NZ Arb's membership

All have varying training needs and methods of securing that training along with a varying ability to fund training.

All have a desire to see that any reform of vocational education adds to, rather than subtracts from what we have now.



Effectiveness of current industry engagement with training providers (ITPs and ITOs)

The discussion papers appear to be premised on a number of high-profile failures or bailouts of ITPs and instances where there has been poor engagement between ITPs, ITOs, industry bodies and business. The perception is that all industries have failed to engage and deliver effective training. We do not believe that is the case in the arboriculture industry, albeit we acknowledge that there has been sustained under-investment for many years that has led to skill shortages and under-supply of talent to the industry.

Relationships between the ITPs (MIT, Wintec and Otago Polytech), ITOs, NZ Arb and business are functional, effective and have delivered results. This has been demonstrated with the aforementioned parties collaborating to review, create and adopt the new arboriculture qualifications with a more consistent national theme as part of the recent Targeted Review of Qualification (TRoQ) review. However, the intersection of arboriculture with other industries such as horticulture, electrical utilities and forestry, has led to inconsistent compliance requirements across New Zealand, meaning businesses have to carry out additional training for staff post their arboriculture qualifications. These qualifications are not currently provided by ITPs and have been provided by a range of different ITOs. To date the arboriculture industry has had to maintain relationships with multiple ITOs including Primary ITO, Connexis, Competenz and the Skills Organisation.

Strengths and limitation of the proposal

Strengths

- An increased focus on the soft skills as well as technical knowledge
- Formal integration of industry input through the ISB
- One point of contact for employers to obtain training
- Decreased competition between education providers Potential for increased efficiency with a single Skills & Technology Institute

Limitations

- The proposal in its current form lacks enough detail to fully understand the consequences of the reform for a niche industry such as arboriculture.
- No additional funding has been identified as part of the vocational training reform and merging ITOs with polytechnics is unlikely to solve current financial issues
- Changes to workplace-based training and assessment are not adequately described in the consultation documents nor explained at regional workshops.
- Government have indicated at reform workshops that the goal is to reduce the number of ITOs further by consolidating them into newly formed ISBs. The number of industries in an ISB, their level of representation and access to resources are not clearly defined in the proposal.



Timing and linkage to immigration policy reform

The arboriculture industry in New Zealand has been facing a skill shortage for the past 20 years and relies heavily on recruiting skilled arborists from outside New Zealand to maintain a functioning workforce. As much as 15% of the industry is made up of skilled migrants and/or those on working visas. At the same time as the Ministry of Education is proposing change to vocational education, the Ministry of Immigration is proposing reform of immigration policy and particularly in relation to skilled migrants. The proposed amendment to immigration policy presupposes that vocational education will provide the right outcomes by delivering an adequate number of skilled employees to match the shortfall created by a change to the current immigration policy.

NZ Arb are concerned that the timing of both proposed changes will leave our industry at a significant risk where vocational training cannot deliver the skilled workers necessary, and the market forces do not allow for the necessary on-boarding to employ overseas-trained staff. There needs to be some understanding of the phasing between overhauling the vocational education system and allowing accredited employees some leeway to bridge the skills gap in the interim.

Concerns for the future of arboriculture training under the proposal

NZ Arb has engaged with its members, the industry, private arboriculture training providers, polytechnic colleges, ITOs and attended public consultation workshops. This engagement has highlighted the following concerns if the current proposal is implemented.

- Currently only three industry training providers (ITPs) that have registered NZ qualifications in arboriculture (Wintec, MIT, Otago). NZ Arb do not believe these three institutes will be resourced to supply the entire country's training requirements apart from in a campus setting.
- In their current form, the ITPs may not have the resources required to provide the training. How will the shortfall in trainers be met?
- The current apprenticeship system allows for off-job training via 1-2 day courses. There is concern that any longer than this would put the burden of undue resourcing and financial pressure on employers (particularly the smaller ones) which would then remove the incentive for them to take on apprentices.
- Arboriculture being a niche specialised industry, it will be under-represented on an ISB if grouped with larger industries and there is no clear direction from government on how the reform will manage this. An industry such as ours does not easily fit into some of the broader practices such as forestry or horticulture.
- There is concern over how ISBs will be managed to avoid larger industries overshadowing smaller industries which could lead to their missing out on their training needs and requirements.
- Due to the large geographical spread of our industry and the small number of training providers, the regions will not be provided with the training as and when they require it.
- Specialist training for utilities and civil infrastructure works requires practical and on-the-job experience which cannot be replicated in a classroom or staged environment. ITO providers have developed more mobile training skills and built their infrastructure to suit, especially in the field of utility arboriculture. Should this devolve back to ITPs, without a substantial shift in training infrastructure and methodology, there is the potential for an unintended "health &



safety” risk, where risk-based, on-site industry-specific training cannot be performed, or is poorly delivered.

- How will the parameters for ‘industry’ will be defined when setting up the ISBs and will they truly represent the entire industry? For arboriculture, would it include councils, large business, small business, trainers, students and individuals working within the industry?
- Voluntary industry representation within an ISB is likely to be from larger companies who have the resource to support an employee’s involvement with an ISB. This may lead to disproportionate representation of the industry’s training needs as a whole.
- ISBs and regional leadership groups have the ability to make assessments, but any initiatives are to be approved by the TEC after a cost-benefit analysis. How will the government ensure that the ITPs will not supply training only to the courses which are considered more cost-effective? This is of particular concern as the costs associated with training arborists are higher than other industries as we require smaller class numbers and costly investment in equipment.

Risk

NZ Arb’s members believe the following risks exist if the proposal is adopted in its current form.

- Future TEC cost / benefit analysis is likely to prohibit an increase in arboriculture training at education centres.
- Arboriculture is a niche industry with specific skills and safety-critical training needs that will suffer under the proposed reforms and will get lost in a national institute.
- It is not realistic to expect training staff from disbanded or reconfigured ITOs to transfer to ITPs. Location, teaching philosophies and delivery infrastructure may differ, thereby increasing the risk of “brain drain” with valuable trainers and assessors leaving the industry or being lured into commercial roles where their skills are potentially lost to the wider industry.
- Larger employers will absorb the cost of training staff and act as de-facto training institutes for smaller companies, who if the costs of training increase or become more onerous, are less likely to engage in training.
- As arboriculture is a largely unregulated industry, employers may move back to internal competency training rather than training for a formal qualification which will lead to untrained workers following bad practices and an increased health and safety risk for employers.
- Potential employees may be deterred by having to move away from home to study and cost may prohibit them from enrolling.
- If all the polytechnics merge, a nationwide curriculum will discourage innovation in arboriculture education through competition.
- NZQA hold all qualifications and there is no reference in the proposal as to how an ISB will influence or instruct NZQA. There is a risk that an ISB that represents the training needs of our industry will have little-to-no influence over the training providers that offer and award our industry qualifications.



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Conclusion

NZ Arb believes that there is merit in combining the administrative functions of ITPs and support the increased involvement of industry in the development of a national curriculum.

Arboriculture is a highly specialised industry which relies heavily on a high-functioning vocational training system to develop the skills required for the work to be carried out safely and efficiently. Any changes to the current system must aim to strengthen accessibility to training across the regions while continuing to provide a high-quality standard of training.

The arboriculture industry has concerns over the proposed changes and the effect this will have on the industry which is already suffering from a skills shortage. The concerns expressed in this submission would need to be addressed before NZ Arb could fully support the changes.