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Tēnā koe Gillian

Thank you for the opportunity to make a submission on the proposed industry coverage of Industry Skills Boards (ISBs). We are providing this submission outside of the survey tool, because it provides information that does not fit the survey questions.

Industry classifications

The coverage of WDCs was broadly based on the Vocational Pathways Framework (2012). The Australia New Zealand Standard Industrial Classifications Level 4 (ANZSIC) were used to identify 39 industries within the coverage of Toitū te Waiora, as set out in our Order in Council. Our Order in Council then went on to essentially invent 10 further industry classifications.

Neither of these statements of industry classifications within our coverage mapped consistently to the qualification classification systems or the almost 300 occupations in our purview (based on the old Australia New Zealand Standard Classification of Occupations Level 6 (ANZSCO)). Detailed concordance was never carried out or agreed, resulting in 'horse trading' of industries and qualifications between the Workforce Development Councils (WDCs). TEC's use of the O*Net classification system as a base for Tahatū further compounded this.

The proposed coverage of ISBs presents 'industries' that appear to be a mix of occupations, industries, abbreviated NZCSED titles, NZQA fields, subfields, domains, and colloquial titles. Using yet another list of made-up 'industry' names will create challenges for ISBs in performing their functions, particularly in standard setting and workforce analysis. Accessing the data required for workforce analysis and investment advice relies on use of existing standardised New Zealand classification systems.

We recommend detailed concordance is conducted and agreed prior to ISBs commencement, based on the respective New Zealand classification systems of ANZSIC, NOL, NZSCED, NZQA field, subfield, and domain classifications, and NZQCF qualifications.

Proposed Community and Social ISB

We recommend the proposed Community and Social ISB is renamed "Education, Health, and Social ISB" to better reflect the industries represented. Our current industry stakeholders say they can't see themselves in the 'Community and Social' ISB and for many, they can't see themselves in any proposed ISB. We have encouraged them to make to make submissions on the proposed coverage to ensure their concerns are heard.

Proposed coverage of ISBs

We largely agree with the proposed coverage of ISBs as set out in the consultation document, with the caveat around need for detailed concordance using standardised classification systems.

However, we note that a number of industries are absent from the proposal. We have appended a table that comments on the proposed industry coverage and includes recommendations for coverage of industries not mentioned in the proposal.

We recommend that all qualifications relevant to a specific industry / occupation are brought together within one ISB. This may require transfer of qualifications from other standards setting bodies. We are disappointed the draft legislative changes do not provide stronger mechanisms to require the transfer of all standard setting to the ISBs.

We also believe there are too many ISBs proposed. The ratio of governance to staff will be disproportionate, and organisational structures will be top-heavy. A more sophisticated approach could be to move away from grouping industries by traditional classifications to better reflect contribution to economic growth, as suggested by Toi Mai in their submission.

That said, our submission here is based on the frameworks we currently work within, and the coverage proposed.

Industries and qualifications spanning ISBs

A number of proposed 'industries' span multiple industries and multiple ISBs. For example, qualifications relating to health and safety, and first aid. They require significant time and resource to conduct complex qualification product review and development.

For example, the scheduled review of occupational health and safety qualifications in 2026 is expected to take two years and cost some \$300,000 (excluding the FTE contribution required of staff across ISBs and the FTE contribution of stakeholders across industries). We would recommend that these industry-spanning qualifications sit with NZQA. However, if there is a preference for these sorts of qualifications to sit within one ISB, then we recommend the Education, Health, and Social ISB, with adequate funding and an expectation of ISB collaboration.

There are also qualifications that clearly sit within one ISB, but have some alignment to another ISB, for example, 1837: New Zealand Certificate in Fire and Rescue Service (Aviation Rescue First Fighting) (Level 3). We recommend this would sit with the Education, Health, and Social ISB for its alignment with fire and other emergency services, with an expectation of collaboration with the Services ISB responsible for aviation services. Again, detailed concordance once ISB industry coverage is determined will identify these qualifications and confirm responsibilities.

Government training establishments

We recommend that all industries with provision by government training establishments sit within the coverage of one ISB. Currently, policing and defence sit with Ringa Hora. Fire and emergency services, corrections, and social work sit with Toitū te Waiora.

This split sees the three 'first responder' industries (ambulance, fire, and police) separated and disconnected from the closely related civil defence and emergency management, emergency contact centre operations, intelligence, case management, and public sector service delivery qualifications. We recommend all the government or public service 'industries' and related qualifications sit with the Education, Health, and Social ISB.

We understand that Ringa Hora may support qualifications in case management and public sector service delivery being moved to the Education, Health and Community ISB, further strengthening the case for bringing these related industries and qualifications together.

Qualifications related to industries that sit outside of ISB scope

There are a number of qualifications relevant to industries that sit outside of ISB scope. For example, 2764: New Zealand Diploma in Holistic Education (Level 5) is likely to sit with the Education, Health, and Social ISB. It is relevant to primary, secondary, and special education industries (currently missing from the proposed coverage), and relevant to the regulated professions that require Level 7 and higher qualifications that sit outside of the scope of WDCs.

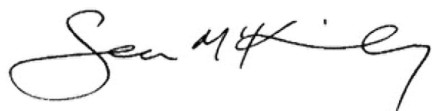
We recommend these sorts of qualifications are specifically included in the coverage of the ISB at detailed concordance, with specific requirements for collaboration with the relevant government agencies, regulatory authorities, and standard setting body for the related aligned Level 7 and higher qualifications.

Summary

We largely agree with the proposed industry coverage of ISBs, however implore you to ensure detailed concordance is carried out using standardised New Zealand classification systems. Failing to do this will simply transfer the challenges currently faced by WDCs to ISBs. This is the opportunity to get it right from the outset.

We have appended a table that comments on the proposed 'industry' coverage and includes recommendations for coverage of 'industries' not mentioned in the proposal.

Ngā mihi nui,



Sean McKinley
Chief Executive

Appendix One: Comment on proposed ISB coverage

Proposed ISB	'Industry'	Comment	Related current WDC ANZSIC Level 4
Education, Health, and Social ISB	Health and wellbeing	Agree. This is a very broad term and covers many of the 'industries' in the proposal. If specific ANZSIC L4 descriptors are not used, suggest this is simply renamed 'health'.	Q840100 Hospitals (except psychiatric hospitals) Q840200 Psychiatric hospitals Q851100 General practice medical services Q851200 Specialist medical services Q852000 Pathology and diagnostic imaging services Q853100 Dental services Q853200 Optometry and optical dispensing Q853300 Physiotherapy services Q853400 Chiropractic and osteopathic services Q853900 Other allied health services Q859100 Ambulance services Q859900 Other health care services n.e.c
Education, Health, and Social ISB	Dementia care	Agree. This is a very broad term and relates to other 'industries' in the proposal. If specific ANZSIC L4 descriptors are not used, suggest this use 'dementia care' as a subset of 'health'.	

Education, Health, and Social ISB	Community health and support	Agree. This is a very broad term and relates to numerous industries and services. If specific ANZSIC L4 descriptors are not used, suggest this is simply a subset of 'health'.	
Education, Health, and Social ISB	Diversional therapy	Agree. Diversional therapy is used across a number of industries. If ANZSIC L4 descriptors are not used, suggest this is simply a subset of 'health'.	
Education, Health, and Social ISB	Disability support	Agree. If ANZSIC L4 descriptors are not used, suggest use 'disability support' as a subset of 'health'	Q860900 Other residential care services Q879000 Other social assistance services
Education, Health, and Social ISB	Aged care	Agree. If ANZSIC L4 descriptors are not used, suggest use 'aged care' as subset of 'health'	Q860100 Aged care residential services
Education, Health, and Social ISB	Mental health and addiction	Agree. If ANZSIC L4 descriptors are not used, suggest use 'mental health and addiction' as a subset of 'health'.	Q840200 Psychiatric hospitals Q860900 Other residential care services Q879000 Other social assistance services Q859900 Other health care services n.e.c
Education, Health, and Social ISB	Dental and hearing assistance	Agree. These are two distinct industries, both subsets of allied health. If ANZSIC L4 descriptors are not used, suggest use 'allied health' as a subset of 'health' (along with other allied health occupations).	Q853100 Dental services Q853900 Other allied health services

Education, Health, and Social ISB	Peer support	Agree. Peer support is conducted across a range of industries. If ANZSIC L4 descriptors are not used, suggest peer support is simply a subset of 'community and social services'	
Education, Health, and Social ISB	Youth work	Agree. If ANZSIC L4 descriptors are not used, suggest youth work is simply a subset of 'community and social services'.	
Education, Health, and Social ISB	First aid	If these cross-industry qualifications are to sit with an ISB, then it should be with Education, Health, and Social ISB. If ANZSIC L4 descriptors are not used, suggest 'first aid' is retained.	
Education, Health, and Social ISB	Ambulance practice	Agree. Suggest use ANZSIC L4 descriptor. ANZSIC L4 descriptors are not used, suggest use 'ambulance services' as a subset of 'health'.	Q859100 Ambulance services
Education, Health, and Social ISB	Adult and tertiary teaching	Agree. Suggest use ANZSIC L4 descriptor. If ANZSIC L4 descriptors are not used, suggest use 'adult education' as a subset of 'education'	P821900 Adult, community, and other education n.e.c
Education, Health, and Social ISB	Health and Safety	If these cross-industry qualifications are to sit with an ISB, then it should be with Education, Health, and Social ISB. If ANZSIC L4 descriptors are not used, suggest 'health and safety' is retained.	O77190 Other public order and safety services
Education, Health, and Social ISB	Cleaning and laundry	Agree. Suggest use ANZSIC L4 descriptors.	N731100 Building and other industrial cleaning services N731299 Building pest control services

Education, Health, and Social ISB	Emergency communication centres	Agree. Suggest this is simply a subset of ANZSIC L4 'public order and safety services'. This could go further to include all call centre operations.	O77190 Other public order and safety services N729400 Call Centre Operation
Education, Health, and Social ISB	Regulatory compliance	Agree. But suggest use the ANZSIC L4 descriptor.	O772000 Regulatory services
Education, Health, and Social ISB	Corrections officers	Agree. But suggest use the ANZSIC L4 descriptor.	O771400 Correctional and detention services
Education, Health, and Social ISB	Intelligence	Agree. But suggest use ANZSIC L4 descriptor. If ANZSIC L4 descriptor is not used, suggest retain 'intelligence'.	
Education, Health, and Social ISB	Funeral services	Agree. But suggest use ANZSIC L4 descriptor.	S952000 Funeral, crematorium, and cemetery services
'Industries' missing from the proposal			
We suggest the Education, Health, and Social ISB	Early childhood education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'early childhood education' as subset of 'education'.	P801000 Preschool education Q871000 Child care services
We suggest the Education, Health, and Social ISB	Primary education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'primary education' as subset of 'education'.	P802100 Primary education

We suggest the Education, Health, and Social ISB	Secondary education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'secondary education' as subset of 'education'.	P802200 Secondary education
We suggest the Education, Health, and Social ISB	Combined primary and secondary education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'combined primary and secondary education' as subset of 'education'.	P802300 Combined primary and secondary education
We suggest the Education, Health, and Social ISB	Special education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'special education' as subset of 'education'.	P802400 Special school education
We suggest the Education, Health, and Social ISB	Technical and vocational education and training	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'adult education' as subset of 'education'.	P810100 Technical and vocational education and training
We suggest the Education, Health, and Social ISB	Higher education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'higher education' as subset of 'education'.	P810200 Higher education
We suggest the Education, Health, and Social ISB	Arts education	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'arts education' as subset of 'education'.	P821200 Arts education
We suggest the Education, Health, and Social ISB	Educational support services	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'educational support' as subset of 'education'.	P822000 Educational support services



TOITŪ TE WAIORA

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We suggest the Education, Health, and Social ISB	Fire and other emergency services	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors.	O771300 Fire protection and other emergency services
We suggest the Education, Health, and Social ISB	Civil defence and emergency management	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors. If ANZSIC L4 descriptors are not used, suggest use 'civil defence and emergency management'.	O771300 Fire protection and other emergency services
We suggest the Education, Health, and Social ISB	Police services	Missing from proposed coverage. Suggest use ANZSIC L4 descriptors.	O771100 Police services
	Urban pest management	Missing from proposed coverage. Suggest this is located with rural pest management in the Food and Fibre ISB, or with building and industrial cleaning services in the Education, Health, and Social ISB	N731100 Building and other industrial cleaning services N731299 Building pest control services