

## **Introduction from HITO CE**

*Hi all,*

*Below, you will find the specific answers that HITO is submitting to NZQA's Consultation survey.*

*We are passionate about our industries, employers and learners and all our feedback is about supporting employers and learners first and foremost.*

*We have been asked by NZQA to share this consultation with you. We have provided you with our feedback in case this is useful for helping you better understand the proposals and their potential impact. We encourage you to provide your own feedback by 16 June either by completing the survey or by providing more general feedback to the email address (VQconsult@nzqa.govt.nz).*

*If you have specific questions, NZQA are providing zoom sessions and can also be contacted through their email or by phone (0800 697 296).*

*Kay Nelson,*

*Chief Executive*

*NZ Hair and Beauty Industry Training Organisation*

## **NZQA – Consultation on simplifying New Zealand qualifications and other credentials**

### **Proposal 1**

#### **Consultation question 1.1:**

**Under proposal 1, do you support Option A (implementing the current legislative settings) or Option B (further simplification) or another option?**

We support Option B – further simplification.

#### **Please tell us the reasons for your response.**

The reasons we support this option are:

- We feel that this option better meets employer and learner needs.
- With a 'national curriculum', employers will be able to be more confident that there is consistency of skills across all learners, no matter which provider they attend.
- Employers should have more opportunity through the WDC to input to the development of one consistent set of skill standards, national curricula and qualifications than they do to many local programmes of study from various providers.
- Learners transferring between regions will have the same requirements to meet.

**Consultation question 1.2:**

**For Option A, are there improvements that could be made, or issues that need to be addressed?**

The mandatory use of skill standards and approval of all provider programmes by the WDC will ensure more consistency between providers, however it will be important to ensure the input from the specific industries at national and regional levels. Hairdressing and Beauty employers are small business operators and are very short of time to provide input to the development of qualifications. There are no large employers that can represent the needs of all the smaller businesses located in every town across the country. Therefore, the methods for gaining input at both national and regional levels needs to take into account the nature of the businesses in these industries and not rely on more generic Regional Skills Leadership Groups to have the specific level of expertise required to provide input and make decisions on qualifications.

**Consultation question 1.3:**

**For Option B, do you have any comments about how the WDCs and providers could collaborate on a 'national curriculum' (or core content) for specification in the qualification?**

It is important to ensure that industry professionals, rather than providers, have the most say in the specification of the qualification. Many of the staff at providers have not been actively working in the industry for many years. This means they often do not have the best view on what is required in terms of core content. Providers, as educators, are well placed to decide how best for the content to be taught but not on what the core content should be.

**Consultation question 1.4:**

**For Option B, do you have any comment on how this option may work for non-WDC developed New Zealand qualifications at levels 1 – 7 on the NZQF (e.g. those developed by NZQA, regulatory bodies, government training establishments, and providers)?**

No comment.

**Consultation question: 1.5:**

**For Option B, what would the impact be on your organisation?**

There would be no impact on HITO, however for our employers within our industries we feel that the impact would be to have more consistency between learners coming out of providers. With a national curriculum in place, learners would all have the same national base of knowledge and skills. With the current situation, it is difficult for employers to understand and be able to evaluate the differences in skills between potential employees who have attended different providers.

Particularly given that the hair and beauty industries are unregulated, the greater focus on a national curriculum will provide employers and their customers with more assurances about what having a qualification actually means you are able to do.

From a standard setting point of view, moderation would need to be across all providers, not just those using current unit standards. This is likely to increase the workload for moderation across the system.

**Consultation question 1.6:**

**For Option B, what do you see as the implementation challenges?**

Assessment would need to be the same or similar across providers. Depending on how specific the new skill standards are, assessments can often be open to interpretation in terms of the different methods of assessment that can be used. This would need to be monitored and moderated.

Providers will need to determine what elective components they add to the core curriculum to differentiate their offer from other providers, assuming that there is more than one provider.

**Consultation question 1.7:**

**What other impacts do you foresee arising from Option B? Impacts could be on tertiary learners, school students, providers (including universities, wānanga, Te Pūkenga, PTEs, and schools), industry, and communities. How could these impacts be measured?**

We see the impacts as follows:

Better for the industry if there is more standardisation of qualifications and skills.

Better for customers and communities to more easily understand the specific skills and knowledge that has been covered in a particular qualification.

Better for learners who can more easily understand what will be covered by providers within a particular qualification.

More flexibility for learners that move between regions as they will have the same programme content and requirements across regions.

Providers will be able to differentiate themselves based around the elective components of the qualification, while the learners and employers will have the assurance that the core components required have been covered.

**Consultation question 1.8:**

**For Option B, do you anticipate any risks? If so, please describe.**

Building and maintaining industry relationships to hear the voices of industry and ensure appropriate engagement with the WDC is crucial.

The biggest risk is that the WDC, because it represents so many different industries, does not get the right level of input from employers across the country to be assured that the national curriculum set is actually what all employers require. If the skill standards and national curriculum set is not what employers need, there will now be no, or very limited, ways for the provider to adjust or correct this at the programme/delivery level.

Another risk is that provider staff do not understand or do not teach to today's industry requirements and systems because they have been out of industry for some time.

**Consultation question 1.9:**

**For Option B, do you anticipate any costs? If so, please describe.**

A major cost for the hair and beauty industries will be ensuring full representation across thousands of geographically dispersed businesses before finalising skill standards and national curriculum. There will also be additional cost for moderation with everyone using skill standards compared with the current system where a reducing number of providers are using unit standards.

**Consultation question 1.10:**

**How could the system encourage greater collaboration by providers? (e.g. developing shared teaching and learning resources for use by all)**

Saving of costs is usually a good motivator for increased collaboration.

There could be opportunities to share assessments between providers as these are costly to create and it would benefit the system if they were the same/consistent across providers.

If teaching and learning resources were designed centrally and given to providers at no cost, this would reduce costs to providers for resources and therefore encourage their use.

Having an “open source” approach to materials where educational experts could add or make enhancements to materials for the good of the system and leave them available for use by all.

**Consultation question 1.11:**

**Do you have anything else you would like to say about this proposal?**

No

**Proposal 2**

**Consultation question 2.1:**

**Do you support replacing training schemes with micro-credentials?**

Yes

**Please give us the reasons for your response.**

Micro-credentials created by the WDC would allow more providers to deliver them which would more quickly respond to specific industry needs.

Few people understand what training schemes are. It would reduce the terminology in the system and therefore increase understanding.

**Consultation question 2.2:**

**What impacts do you foresee for your organisation or others arising from the proposed changes? This could include consideration of impacts for tertiary learners, school students, wānanga, schools, providers, universities, industry, community.**

If micro-credentials were available to all rather than those who developed them it could provide a benefit to the industry. Currently there are few micro-credentials within the hair and beauty qualifications.

**Consultation question 2.3:**

**Do you anticipate any risks associated with replacing training schemes with micro-credentials? If so, please describe.**

None known.

**Proposal 3**

**Consultation question 3.1:**

**Do you support further legislative change separating approval from accreditation of micro-credentials, which will enable WDCs to develop micro-credentials for use by providers?**

Yes

**Consultation question 3.2:**

**What impacts do you foresee for your organisation and others arising from the proposed changes? This may include the impact for tertiary learners, school students, wānanga, schools, providers, universities, industry, and communities, including iwi and hapū.**

WDCs would be able to create relevant micro-credential specialisations to address specific industry needs. This is especially relevant for the hair and beauty industries that are unregulated and smaller qualifications may be more accessible to learners.

However, we want to reinforce that micro-credentials need to complement and add to the qualification, not replace it.

**Consultation question 3.3:**

**Do you think non-providers (e.g. WDCs) should be able to seek NZQA approval of micro-credentials for providers to deliver (subject to NZQA accreditation)?**

Yes

**Consultation question 3.4:**

**Do you anticipate any risks with proposal 3?**

An increase in micro-credentials could potentially draw people away from completing full qualifications. It will be important for the WDC to oversee the creation of the right micro-credentials that would provide benefit to the industry without diluting the full qualification.

**Consultation question 3.5:**

**Are there any costs, associated with this proposal, that have not been anticipated? If so, please describe.**

None known.

**Consultation question 3.6:**

**Do you have any comments on how microcredentials could play a greater role in supporting the intent of RoVE?**

Collaboration between the WDCs could mean the identification of needs and gaps across industries that common micro-credentials could fill. Common micro-credentials across industries could be an effective and efficient way of filling some general skill needs and gaps, rather than each industry creating their own micro-credentials.

**Consultation question 3.7:**

**Do you have anything else you would like to say in relation to training schemes and micro-credentials?**

No