

Introduction

1. Thank you for the opportunity to comment on the Vocational Education and Training Outcomes Framework paper (the Outcomes Framework).¹
2. As the National Centre for Tertiary Teaching Excellence, Ako Aotearoa's mandate is to support the best possible outcomes for all learners in tertiary education. We do this through supporting change projects that lead to sustainable benefits for learners, providing professional development, and leading discussion in the sector on key strategic issues. Our focus lies across the entire tertiary system, from postgraduate research degrees to fundamental skills and 'second-chance' learning, and involves all aspects of tertiary education that support good learner outcomes. We have a significant interest in professional and vocational education, and a strong history of supporting VET-related work.

General commentary

3. Conceptually, we support the development of a VET Outcomes Framework and the Working Group's intention that discussions about VET should shift from focusing on outputs, to concentrating on the quality, nature, and use of the skills and capabilities being produced.
4. The intervention logic and associated high-level outcome areas identified in the document appropriately reflect the aims of VET. As discussed later in this submission, we particularly welcome the recognition given to the role of workplaces in a high-quality VET system.
5. We note that the document's focus on defining and measuring outcomes means that it does not consider what actually facilitates or hampers the achievement of those outcomes. This includes a wide range of factors both internal to the VET system (such as pedagogical/andragogical approaches and funding arrangements) and those external to it (such as labour market policy and organisational culture).² We assume that the Working Group intends to undertake further work on these issues in the future.
6. We commend the cross-sectoral approach taken to developing the Outcomes Framework, in that the Working Group includes both industry training organisations and institutes of technology and polytechnics. As the document notes, though, private training establishments and wānanga are also significant providers of VET. It would be valuable for the Working Group to include members from these sectors to ensure its work is fully informed by relevant perspectives and contexts.

¹ As part of preparing this submission, Ako Aotearoa commissioned an independent commentary from Dr Catherine Savage. This submission incorporates that commentary, but does not necessarily reflect the specific views of Dr Savage.

² The human capability framework developed by Bryson & O'Neil (2010) provides a strong basis for considering the factors that can both support and hinder VET outcomes.

7. The document positions its approach to developing the Framework as being learner-centred; in such approaches the primary concern is the needs of the learner (in the specific context of VET, 'learner' also includes employees). However, the 'learner voice' does not appear to have informed the Outcomes Framework as it stands, and the document does not clearly refer to any intended future testing with learners and/or employees.³ The Outcomes Framework appears to be mainly driven by the viewpoints of tertiary education organisations (TEOs), firms, and government agencies, who are taken to be speaking in the interests or on behalf of learners. We are not confident that this approach will lead to a framework genuinely built around the needs of learners and employees, especially given that when learners' requirements conflict with those of other bodies, it is often learner needs that are marginalised (Angus *et al.* (2013)).
8. We therefore recommend that further development of the Outcomes Framework explicitly include learner and employee perspectives. This would be most easily achieved through including members of relevant representative bodies (NZUSA and the NZCTU) on the Working Group. Without these perspectives the Outcomes Framework cannot credibly claim to have been developed in the interests of learners or employees.⁴
9. Similarly, we are surprised that the document does not explicitly engage with the position of Pacific or Māori learners and communities. In particular, the document as written does not recognise the importance of the Treaty of Waitangi in New Zealand or the place of Māori as tangata whenua. There is no reference to Pacific Peoples in the document, while the only reference to Māori is consultation with iwi (p4) and it is not clear how this consultation has been reflected in the draft Outcomes Framework.
10. As a (proposed) national framework, the document should reference and reflect the Treaty of Waitangi. Moreover, not only will iwi businesses have particular expectations and demands on their employees not represented in the current outcomes (see, for example, Te Rūnanga o Ngāi Tahu, 2015), but the modern New Zealand workforce needs to be prepared to work within a culturally inclusive environment that supports and respects diversity.
11. It is also unclear how the Working Group believes the Outcomes Framework should relate to existing performance and planning frameworks. For example, the Working Group refers to influencing investment planning (p5), but it is unclear whether or not the Working Group sees the proposed outcome measures as eventually replacing the TEC's Educational Performance Indicators or being added to them. Similarly, the Outcomes Framework has significant potential to feed into Self-Assessment processes, but this is not explored in the current document. We recommend that the final report on the Outcomes Framework discuss its purpose and relation to other such instruments in more detail.

³ Employees may – and indeed should – be considered to be part of 'industry'. We infer from context, however, that industry in this framework refers primarily to organisations representing the interests of employers rather than employee and professional bodies.

⁴ We also note that VET practitioners also appear to have had little input into the development of the Outcomes Framework. This is understandable insofar as the Framework is a strategic instrument. However, as practitioners will ultimately be responsible for achieving these outcomes and subject to organisational policies and processes linked to the Framework, explicitly including their perspectives will be important to its future development.

12. The remainder of this submission addresses the specific sections of the report on which feedback has been requested.

Developing a VET system outcomes framework

13. In broad terms we support moving from thinking about performance purely in terms of outputs to a framework that is linked to the actual aims and goals of the sector. A clear framework has potential to raise the relevance of training, improve consistency between different TEOs (and TEO types), and provide a more sophisticated vehicle for 'steering' the VET sector and evaluating government policies. We advocate considering education and training performance in value-added terms, and an outcomes approach is in keeping with this agenda.
14. As noted above, in a learner-centred approach the key stakeholder group for considering VET outcomes must be the learner. Learners need to be able to access high-quality education, delivered and assessed in a manner appropriate to the programme and their intended career, that will support successful, sustainable, and relevant social, personal, and employment outcomes. Ensuring that learners' needs are met also requires TEOs to understand the requirements of employers, professional and occupational bodies, and communities in order that they can provide or arrange appropriate education and training for learners in their programmes.⁵ When VET works successfully for learners it works for these stakeholders as well – and justifies government investment.⁶
15. We are not clear on what the document means when it asks "how should VET sector leaders apply outcomes information..." (p6). The New Zealand Qualifications Authority's Self-Assessment model already requires TEOs to consider outcomes information as part of their quality assurance processes. Our view is similar: TEOs should use outcomes information to understand their performance and identify areas for improvement. A defined outcomes framework can assist this by clearly identifying agreed types of outcomes that should be examined through this process (recognising that specific measures and indicators should be contextualised at both TEO and programme level to reflect specific goals and environments).
16. At a system level, an outcomes framework is useful for setting an overall agenda (as it identifies focus areas for understanding performance), but there are significant issues in using it to define a generic level of performance by the system. The different components of that system need to engage with highly diverse regulatory requirements, traditions and cultures of training, labour market conditions, specific stakeholder groups and more. A builder, a midwife, and an adventure tourism operator work in very different environments, and performance of the VET system in one area is no guarantee of similar performance in another.

⁵ The public also has a strong interest in VET in two ways. Firstly, the quality of VET programmes can have a significant impact on the economy and society as a whole. Secondly, the public are 'consumers' of VET skills; a hairdresser's client, a resident of an aged-care facility, and a small business owner who hires an accountant all have an interest in the quality of relevant education and training programmes.

⁶ Importantly, taking a learner-centred approach means that when the needs or desires of stakeholders differ, it is those of the learner that must take precedence,

17. Trying to elide these differences and develop a one-size-fits-all model for understanding how 'the system' is performing risks creating meaningless generalisation that do not reflect the experiences of learners or the industries in which they work. Any such macro-level use of the Outcomes Framework should be undertaken on an industry-by-industry basis, allowing for strategic consideration of how well the system is meeting the needs of learners and employees in that specific sector.⁷

The VET system in New Zealand

18. The extent to which VET constitutes a distinct part of the tertiary education system is a complex question. As 'higher' education becomes more conscious of graduate outcomes and traditional VET expands in focus to encompass degree and postgraduate learning (and applied research), the distinctions between them have blurred. In particular, the characteristics of vocational pedagogy identified in the document are also now part of traditionally 'academic' programmes: learning through thinking critically, problem solving, coaching, feedback and conversation are, in our view, characteristics not of *vocational* education and training, but of *modern* education and training. In our experience some practices in New Zealand VET are exemplars of good practice in this respect (see Ako Aoteroa (2016))
19. We recognise that there are pragmatic reasons for framing the VET system primarily in terms of TEOs as the VET Outcomes Framework report does – most obviously, the Government's expectations of these organisations. We note, however, that defining the system in this way can reinforce artificial barriers within education, implying that other TEOs do not need to think about the outcomes outlined in the framework and discouraging the sharing of good practices across disciplinary and organisational boundaries.⁸ We therefore encourage the Working Group to share its work on the Outcomes Framework with other parts of the tertiary education sector – especially those involved in professional education.
20. We strongly support the Working Group's inclusion of enterprises and industry within the definition of the VET system, and note that in a well-functioning VET system workplaces are *active participants* in education – not simply recipients of graduates. Pedagogically, ensuring that training is situated 'in the work' is vital if learners are to take what they have learnt in their education and apply it in their own work; Situated Learning as described by Lave & Wenger (1990) is dependent on developing 'communities of practice' in which learning can be contextualised. At a strategic level, high-quality VET systems function as 'Skills Ecosystems' in which the two worlds of education and work actively engage with each other (see, for example, Dalziel (2012); Hall & Lansbury (2006); Payne (2007)).
21. This is important in understanding VET outcomes, as it implies that these outcomes are partly dependent on workplaces and employers providing an environment that supports

⁷ We note that this type of activity was intended to be part of the Industry Skills Leadership function that ITOs possessed prior to the recent industry training system reforms.

⁸ An alternate definition of VET would focus on intended learner outcomes: the VET system involves programmes linked to a specific definable occupation or career path (or a small group of such). Notably, this definition includes programmes and disciplines that are often not treated as forms of VET, such as law, architecture, and many creative arts.

learning and the effective utilisation of skills. How workplaces can do this effectively has been the subject of several pieces of work that we have funded (see, for example, Becket & Johnson (2014); Chan (2010); Fourie & McClelland (2011); Heathrose Research (2011); Kerehoma *et al.* (2013); Savage & London (2014)), and further discussion of this point can be found in our recent synthesis report *Effective Workplace Learning* (Alkema & McDonald, 2014).

Draft VET Outcomes Framework and potential indicators

22. We broadly agree with the high-level outcomes and intervention logic for the VET system established in the document. We particularly welcome the Working Group's identification of *Workplace leadership and skills utilisation*; as noted above, effective workplace learning environments are key to realising the benefits from skills for learners, firms, and industries.
23. We are concerned, however, at the lack of consideration given to social outcomes. For example, internationally, facilitating social equity is accepted as a key concern of modern VET (see, for example, International Labour Organization (2011); Marope, Chakroun & Holmes (2015)). The document, however, relegates this to a short 'well-being' section, and proposes very broad and simple indicators related to income per capita and life expectancy. There is, for example, no regard given to measuring the performance of VET in regard to outcomes for women, Māori and Pacific communities, or people with disabilities.
24. We also question the value of attempting to establish generic indicators for these outcomes, and thereby trying to measure the performance of 'the system' as a single entity. As noted earlier (paragraphs 16 and 17), the VET system is inherently diverse and any overarching measure will inevitably mask significant variation (both positive and negative) within it. This misrepresentation of 'specific' performance is particularly likely to be the case if, as the document proposes, indicators and datasets developed for other purposes are shoehorned into being used as generic system performance indicators. Any set of high-level indicators would therefore need to be accompanied by detailed analysis of at least industry-by-industry data, and such analysis should involve industry-specific data sources wherever possible.⁹
25. Essentially, we see establishing generic indicators as likely to involve imposing another set of required measures (that will likely not be fit-for-purpose) on top of existing data and quality assurance requirements, for little meaningful gain. As noted earlier, we instead recommend using the Outcomes Framework as a basis for establishing industry-specific indicators. Ideally this will foster an approach that is both cohesive and sufficiently flexible to be relevant and valued by each sector.

⁹The document itself highlights the significant challenges involved in the indicators it recommends; for example, the first two indicators for *technical capabilities* ('persistent labour shortages' and 'ease of finding labour') are likely to be inversely correlated to the third ('employment and earnings'). Others (such as the Household Labour Force Survey) may simply not be usable (or even available) at a finely-grained level, and are thus not suitable as the basis for informing changes to education practice.

26. Similarly, we note that it is unclear who the Working Group envisages as collecting, aggregating, and analysing these indicators at a system level, and in developing and maintaining the new measures it suggests creating. The Working Group may see this as a second-order problem to be addressed in the future, but it is critical to understand these practicalities before establishing the indicators – otherwise indicators may be established that could not realistically be used.

Conclusion

27. In conclusion, we support the development of an Outcomes Framework for VET that will support greater consistency between professional and vocational education programmes, and promote understanding performance in terms of relevant and sustainable outcomes for learners rather than simple outputs. Such a Framework is, however, best used to develop a common approach to understanding and improving industry-specific performance, rather than attempting to measure a generic level of system performance.
28. Furthermore, the discussion document raises a number of complex issues relating to VET and performance measurement, which is valuable in itself. We trust that the points we have outlined above – including the need for inclusion of learner/ employee, Māori, and Pacific perspectives – will assist the Working Group in developing an effective Outcomes Framework for New Zealand VET.

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