Submission to the Ministry of Education

Draft Tertiary Education Strategy (TES) – September 2025

From: New Zealand Aged Care Association (ACA)

Date: [Insert Date]

Introduction

The New Zealand Aged Care Association (ACA) represents almost all providers of aged residential care (ARC) in New Zealand, delivering services to tens of thousands of older people every day. We welcome the opportunity to provide feedback on the draft Tertiary Education Strategy (TES).

The ARC sector is a cornerstone of New Zealand's health and social care system. It is also a major employer, with a workforce of over 40,000, the majority of whom are women and many of whom are migrants. Ensuring the availability of skilled, well-trained, and culturally competent staff is critical to both the quality of care provided and the sustainability of the system.

We support the overall goals of the TES, particularly the emphasis on achievement, access, participation, and stronger industry collaboration. However, we wish to highlight areas where the TES has direct implications for aged residential care and recommend adjustments to ensure the sector's needs are addressed.

Relevance of the TES to Aged Residential Care

1. Workforce Development and Skills Supply

- The ARC workforce is vocationally trained, with caregivers, enrolled nurses, and diversional therapists making up the largest share.
- The TES focus on vocational education, apprenticeships, micro-credentials, and lifelong learning provides a vital opportunity to strengthen training pathways into ARC.
- The establishment of Industry Skills Boards (ISBs) from 2026 must include a clear focus on aged care workforce needs, including dementia, psychogeriatric, and palliative care. Without this, there is a risk that the TES will overlook the sector's pressing workforce challenges.

2. Access and Participation

- The TES commitment to improving participation among Māori, Pacific peoples, disabled learners, and those from low-income backgrounds aligns directly with ARC workforce needs.
- Rebuilding regional polytechnics and ensuring flexible delivery will be particularly important for ARC, given many providers operate in rural and regional communities.

- Supporting these groups into ARC roles contributes both to workforce supply and to more culturally competent care for residents.

3. Economic Impact and Research Links

- TES encourages stronger research partnerships and commercialisation. ARC can benefit through:
  • Research into dementia, healthy ageing, digital health, and workforce innovation.
  • Development of practical tools such as AI-based rostering, telehealth integration, and assistive technologies.
- The strategy must explicitly recognise health and social care research as part of national priorities, to avoid being overshadowed by high-tech or export-oriented industries.

4. Integration and Collaboration

- The TES requires deeper collaboration between providers, employers, iwi, and communities. ARC is well placed to:
  • Partner with regional training providers to co-design qualifications and work placements.
  • Work with iwi and wānanga to build Māori workforce pathways and strengthen cultural competence.
  • Provide significant opportunities for work-integrated learning, given the sector's scale and demand.

5. International Education

- TES seeks to double international education value by 2034. For ARC, this presents opportunities to:
  • Attract international students into health and aged care training programmes.
  • Strengthen immigration pipelines for caregivers and nurses.
- However, safeguards will be needed to ensure these pathways support sustainable, high-quality employment in New Zealand.

Recommendations

1. Embed Aged Residential Care in TES Workforce Planning:
   - Ensure ISBs and TEC investment decisions explicitly address ARC workforce needs.
   - Prioritise qualifications and micro-credentials that support dementia, psychogeriatric, and palliative care skills.

2. Strengthen Regional Training Pipelines:
   - Support regional polytechnics and PTEs to partner with ARC providers in rural areas.
   - Ensure funding and delivery models incentivise providers to offer training in smaller communities.

3. Recognise Health and Social Care Research as a National Priority:
   - Include ARC-related research (dementia, ageing, workforce, digital health) in TES economic impact objectives.

- Support commercialisation of innovations that improve care delivery and efficiency.

4. Support Cultural Competence and Māori Workforce Pathways:
- Ensure wānanga and kaupapa Māori training pathways are supported in ARC workforce development.
- Promote Pacific workforce training and development as part of TES access and participation goals.

5. Leverage International Education for Workforce Supply:
- Align immigration and international education policies to support health and aged care workforce needs.
- Ensure pathways for international graduates into ARC employment are clear and supported.

Conclusion

The aged residential care sector is essential to the wellbeing of older New Zealanders and a major employer in its own right. The draft TES offers important opportunities to strengthen the ARC workforce through improved training pipelines, regional provision, research partnerships, and international education pathways.

We urge the Ministry of Education to ensure that aged residential care is explicitly recognised within the TES priorities, so that the sector can both benefit from and contribute to New Zealand's economic and social development.

Contact for this submission:

9(2)(a)

New Zealand Aged Care Association

Draft Tertiary Education Strategy

A Consultation Response from ACE Aotearoa

Submitter details

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Ka Mua, Ka Muri

Looking back in order to move forward

A Response to the DRAFT TES from ACE Aotearoa, 30 September 2025

1. Introduction

ACE Aotearoa thanks the Ministry of Education (MoE) and the Tertiary Education Commission (TEC) for the opportunity to provide feedback on the Government's new Tertiary Education Strategy (TES).

ACE Aotearoa sees the new TES as the timely opportunity to consider what we have sought to achieve from previous Tertiary Education strategies over the last twenty years, including related reports and frameworks such as Koia! Koia!, the Māori Tertiary Education Framework, and also reports published by the previous Productivity Commission. As the whakataukī shows us, in order to move forward, Ka Mua, Ka Muri, it is important to consider what we have learned from our past, including that which has been successful, and that which remains outstanding, in order to ensure that we can contribute with greater value to New Zealanders inclusion, prosperity and wellbeing through engagement with the tertiary sector.

Our experience is that the Adult and Community Education (ACE) sector is a critical, albeit somewhat under-recognised partner in the tertiary education system, with a history, since 1895, of engaging with and changing the lives of New Zealanders, including those socially and economically marginalised, and with intergenerational needs that may inhibit their success in education and employment.

The ACE sector provides affordable, responsive, local education and professional development to communities, and often within communities, to people who need intensive support to experience first-time success in learning. The sector targets adults and offers programmes to gain foundation skills, building people's capabilities to begin their pathways to achieve and further their education success, and gain employment or promotion within the New Zealand workforce.

2. Definition of the ACE Sector

Adult and Community Education (ACE) is a process whereby adults choose to engage in a range of educational activities within the community. The practice fosters individual and group learning which promotes empowerment, equity, active citizenship, critical and social awareness and sustainable development. ACE occurs alongside the formal education system and is therefore accessible to all. It promotes a culture of lifelong learning. It happens in a wide range of contexts in both structured and spontaneous forms, all of which have their own value.

It may be initiated by individual and group needs which encourage adults to learn to understand their world and to seek change within it.

The nature of ACE makes it well suited to deliver effective programmes in:

- Adult literacy and numeracy provision
- English language and social support programmes for speakers of other languages
- Personal development education

- Revitalisation of Māori language and culture
- Learning for whānau/hapū/iwi development
- Cultural retention
- Education to facilitate group and community development
- Education for social and environmental justice.

Currently ACE is funded by the TEC, through provision in schools, Tertiary Education Institutions (TEIs), and Private Training Establishments (PTEs), or on a user pays basis. Many community providers of ACE are not funded by the TEC. They may be accessing some government funding through other government agencies, or relying on grants and/or voluntary input.

3. Draft TES Objective and Drivers for Change

ACE Aotearoa supports the draft objective for the Tertiary Education Strategy (TES) that establishes:

> *A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.*

ACE Aotearoa would go further to say that the TES should consider revisiting elements of the NZ Productivity Commission's report, *A Fair Chance for All – Breaking the cycle of persistent disadvantage.* While this report is no longer current, it provides useful frameworks that can be used to address persistent disadvantage, social inclusion and wellbeing.

ACE Aotearoa recognises the imperative to address the issues of productivity and innovation challenges and appreciates the role played by the entire tertiary sector to, as noted in the Draft TES Strategy:

- be closely connected to employers and industry, delivering relevant knowledge and skills through flexible learning options at all career stages
- offer opportunities at every level, from foundation literacy, numeracy and life skills to advanced research-led teaching, with formal education, that complements practical and informal learning throughout life.

For ACE Aotearoa, the ACE sector's commitment to New Zealanders who experience marginalisation and disadvantage illustrates how we continue to advocate for, and therefore endorse the TES intention to lift the relevance and performance of the New Zealand tertiary education response to:

- Māori, Pacific peoples, disabled people, those from low-income backgrounds who continue to face significant barriers to success and migrants and refugees,
- the complex needs of school leavers with low prior attainment.

ACE Aotearoa agrees that New Zealand can do more to enable tertiary education to support regional development, being responsive to the needs of local businesses, industries, and communities, to build economic performance in these areas and addresses persistent social disadvantage.

ACE Aotearoa is committed to ensuring rural communities thrive through access to meaningful tertiary education that meet their aspirations and circumstances. We appreciate the recent changes to the Funding Determinations regarding online synchronous and asynchronous learning have enabled rural and other communities' access to a greater range of learning that they may otherwise not experience.

Regarding improved practice, ACE Aotearoa will appreciate the opportunity to discuss how the ACE sector can be engaged in a national process so that **all** providers are supported to evolve their practices to meet changing learner needs, respond to shifting labour market and community demands, and align with national research and innovation priorities.

4. Priorities for this Tertiary Education Strategy

ACE Aotearoa supports the Government's specific priorities for improvement in five areas, and notes for:

- **Achievement**

  ACE Aotearoa recommends amendment to this priority to read:
  *Ensure **all** students, trainees **and other tertiary learners** achieve qualifications **or educational outcomes that enable them to progress** to good careers and economic security, with a focus on strong pathways between school, tertiary education, and work.*

  ACE Aotearoa is concerned to ensure that all learners experience achievement from their tertiary programmes. For those learners who have experienced persistent disadvantage, such as people with complex needs of school leavers with low prior attainment, Māori, Pacific peoples, disabled people, and those from low-income backgrounds who continue to face significant barriers to success, achieving a qualification may not be the first steps back into learning. Instead, the informal or non-formal ACE programmes offer a much broader recognition of achievement, including acquisition of relevant new skills, knowledge and confidence to progress into formal education pathways that can result in the achievement of a qualification, and more.

  Most significantly, inclusion of learners who have faced significant barriers in their educational experience is a very significant adult population of this country. Their rights to be supported to achieve in this Tertiary Education Strategy is part of the economic wellbeing of New Zealand.

  ACE Aotearoa supports reduction in disparities in achievement between population groups (including gender, ethnic, disability and socioeconomic), particularly in fields of study and industries/occupations that have large disparities in achievement but have strong income and employment outcomes. We appreciate the provision of evidence-based approaches to learner success that are appropriate to their learner cohorts and educational setting, and recognise the opportunity to the ACE sector to build sector-wide systems that demonstrate the social, educational and economic contribution of every programme.

  We would suggest that Māori, Pacific peoples, disabled people, and also those from low-income backgrounds who continue to face significant barriers to success, be reinstated as ACE Priority Learners in the next Funding Determinations. There was strong agreement that the ACE sector must continue to push for meaningful equity for everyone.

  It should also be noted that removal, and continued absence, of terms from this year's Determinations, such as culturally appropriate, or a focus on female learners in 'non-traditional' careers, will not be consistent with the intentions of the new TES.

- **Economic Impact and Innovation**

  Increase the economic impact of tertiary education by delivering relevant, adaptable skills, and research that drives productivity, innovation, commercialisation and broader economic opportunities.

  ACE Aotearoa supports the priority and notes that economic impact should explicitly include reversing negative outcomes, such as:

  - persistent disadvantage,
  - financial, geographic, cultural, and systemic factors that disproportionately affect under-served communities such as Māori, Pacific peoples, disabled people, and those from low-income background, and
  - low literacy and numeracy levels.

  As previously noted, the previous Productivity Commission's inquiry into economic inclusion and social mobility – A Fair Chance for All, and other reports published, including by the MoE and TEC, will provide useful insights and frameworks for consideration.

- **Access and Participation**

  ACE Aotearoa recommends amendment to this priority to read:

  Enable access to education and training for people from all backgrounds and regions, ensuring more people build relevant skills that contribute to a productive economy, ***and the wellbeing of themselves, their whānau and families, and their community.***

  For the ACE sector, to enable successful renewed engagement in education, it is important to appreciate, for those most disadvantaged, their preliminary goals may not easily reflect economic or employment outcome. Instead, it is important to note that according to a range of research sources, tertiary education focus on community and foundation education programmes provide numerous benefits including:

  - Improved communications and relationships with learners' families and communities
  - Improved parental engagement in school, creating four times more importance than socio-economic class in influencing performance if young people in school
  - Increase in civic and political participation
  - The average literacy score in a given population is a better indicator of growth than the percentage of the population with very high literacy scores. Importantly a focus on promotion of strong literacy skills widely throughout its population will be more successful in fostering growth, productivity and wellbeing than one is which the gap between high-skill and low-skill groups is large.
  - Taking part in formal and informal tertiary education activity influences attitudes and behaviour related to sustainability, including use of resources and management of local environments.

  Consideration and inclusion of the ACE sector as a valid voice in the determination for strategies and policies to affect change and improves lives for those adults, whānau and communities most marginalised in our communities will benefit discussion of Access and Participation.

The provision of smaller courses in the context of local urban and rural communities is often designed to address specific needs in the community, with the intention to upskill, and support learners to gain employment or seek further education opportunities. What could be possible with an intentional focus across an integrated tertiary education system, would be the potential of partnerships with Polytechnics and Universities, as some ACE providers do to support workbased training, to provide a level of local pastoral care and learner agency development, that enables greater participation and opportunity for achievement.

- **Integration and Collaboration**

  Deepen collaboration between education providers, employers, iwi, research institutions, and communities to align education with regional and national economic development.

  ACE Aotearoa supports sector-wide alignment to regional and national development goals in order to better serve diverse learner needs and maximise the impact of teaching and research.

  As Peak Body for the ACE sector, ACE Aotearoa understands the necessity to maintain opportunity to learn from Iwi, Pacific, rural and other key stakeholders, including government representatives and other providers, and to maintain connection and opportunity to collaborate.

  ACE Aotearoa would recommend that:

  - the MoE and the TEC consider incentives and opportunities to encourage greater collaboration amongst tertiary education providers, including dissemination of case studies as examples of success.

  ACE Aotearoa fully supports partnership between tertiary education providers and hapū and iwi as critical to support Māori development aspirations and to honour te Tiriti o Waitangi. We appreciate that a tertiary education system able to understand and meet the needs and aspiration of Māori communities, iwi, hapū and whānau remains a critical element for Māori. As noted, we would suggest that the MoE and the TEC review the Māori Tertiary Education Framework - a framework that represented a first step toward collective Māori agreement on a strategic direction for tertiary education, with particular regard to its guiding principles and priority areas, to gain any further insights.

- **International Education.**

  Boost numbers of international students, supporting the sector to grow and increasing New Zealand's international connectivity, as set out in the International Education Going for Growth Plan.

  ACE Aotearoa fully supports the value of International Education, appreciating the mutual benefits for international students and New Zealand.

5. Roles and Expectations for Different Parts of the Tertiary Education System

ACE Aotearoa has no comments to make on the Roles and Expectations for Different Parts of the Tertiary Education System, but would note that some ACE providers, including REAPs and unfunded providers, such as WEAs and Te Ataarangi, are not included in the categories.

ACE Aotearoa asks, while recognising that the TEC is not solely responsible to ensure an effective, joined-up and collaborative tertiary education sector, that the TEC consider facilitating greater cross-sector engagement, including representatives of the ACE sector, to guide policy and practical solutions for the tertiary education system.

6. Monitoring Outcomes

ACE Aotearoa believes we need to see measurable outcomes that report on learner participation, retention, and achievements in ways that are easily evident. This includes providing results in numbers, rather than percentages or percentage points, for Māori, Pacific peoples, disabled people, and those from low-income backgrounds who continue to face significant barriers to success.

It will also be valuable to measure and report on achievements toward diversity, equity and balance and the proposed TES priorities, providing annual comparisons over the following years – celebrating successes, and recognising, in order to then address, where greater effort and improvement is required across the tertiary education system.

Finally, ACE Aotearoa believes that the value of NZ tertiary education should be widely appreciated by our country. Greater nationwide promotion of the benefits of tertiary education, its breadth, and what the MoE and TEC are doing to make accessible and achievable difference to all, inclusive of those who experience marginalism, disengagement and disadvantage would be a valuable way to enhance achievement of the TES. Hearing from a diverse range of learners across the full scope of tertiary programmes and learning opportunities may offer other New Zealanders options for their engagement.

7. Final Comments

ACE Aotearoa greatly appreciates the opportunity to provide comments as part of the TES consultation process.

Please contact 9(2)(a) for any clarification or additional information.

Mauri ora.

Draft Tertiary Education Strategy

Targeted Consultation Response –

26 September 2025 by

Ako Aotearoa – the National Centre for Tertiary Teaching Excellence

(Hosted by Massey University, established 2007)

Nā āheitanga ā-mātauranga, ko angitū ā-ākonga
Building educational capability for learner success

Ako AOTEAROA

Consultation process – “the brief”

This draft of the Government’s new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025. The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

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Organisation category (please indicate):	Other (please specify) – National Centre for Teaching Excellence hosted by Massey University
Role/position	9(2)(a)
Request to withhold part or all of submission	We agree that the whole submission can be made public.
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Objective and Drivers for Change questions

1. Do you have any comments on the draft objective for tertiary education?

Aotearoa New Zealand requires a tertiary education system that enables all people to succeed with knowledge and skills that advance and contribute to an innovative, high-productivity economy, and to enjoy high quality lives. This system must deliver equitable outcomes for underserved learners in tertiary education, including Māori and Pacific learners, as well as Disabled learners and Learners from low socio-economic backgrounds.

It is essential to value and recognise the critical contribution of all New Zealanders to our future prosperity, social cohesion and national and international identities. The clear need remains for a coordinated national approach to ensure the sector is informed by high quality, place-based research and relevant and topical professional development and advocacy. Ako Aotearoa is uniquely positioned to provide essential programmes and services and as an independent voice for the full diversity of the tertiary education and training sector.

Focusing primarily on economic growth as a key objective risks narrowing the system's wider contribution to ensuring social mobility, community/civic participation and cohesion that is enriched by multiple cultural identities of communities in Aotearoa New Zealand. Furthermore, there is a strong case to rebalance the objective so that it acknowledges equity, te Tiriti o Waitangi and inclusion as fundamental drivers alongside productivity. This could position learner success and equity as central enablers of innovation and productivity rather than being viewed as parallel goals.

The statement for "Improve quality of life" could be stronger, and less subjective – i.e., who is making the decisions about what is considered as 'quality of life'? Furthermore, "innovation" and 'high productivity' do not necessarily equate to improvements in people's or communities' quality of life. We also suggest the authors replace the last part of the sentence with stronger wording such as: "...high-productivity economy, sustained by a strengthened foundation of equity, civic responsibility, and democracy."

Page 5, paragraph 4 begins with "The tertiary education system must help support…". The inclusion of "help" weakens the statement. To demonstrate stronger intent, the sentence should state that the system "must support' these communities directly. While paragraph 4 refers to communities realising their aspirations, it's important to ask:

- Are those aspirations actively recognised and acted upon by the system?
- Are these communities genuinely included in policy-making processes?
- Is there evidence of collaborative, cross-sector practices that reflect their leadership and knowledge?

On the surface, the sentence may appear equitable, but without explicit mechanisms for inclusion, recognition, and shared decision-making, it risks being performative rather than transformative.

2. Do you have any comments on the drivers of change in tertiary education and how the system should respond to these? What is the term of this TES?

The system response as described in the draft document is heavily positioned around labour-market alignment. A fuller picture would recognise the tertiary system's roles in cultural enrichment, democratic participation, and local community development, all of which contribute directly and indirectly to productivity.

The Ako Aotearoa 2025 briefing paper on the value of leadership for Pacific learner success through tertiary education recommends policies that address socio-economic barriers and promote equity in education. This will require additional training for educators on culturally responsive teaching practices and Pacific values with ongoing research to evaluate the effectiveness of educational initiatives and make data-driven improvements.

The drivers for change needed to transform tertiary education into a system that recognises, respects and elevates Pacific learners and their communities are through culturally grounded leadership and inclusive practices. These are missing from the current list of drivers for change and should be included.

The report's use of the statement - "This will require strong and strategic institutional governance throughout the system" - is one example of the expectations placed on individual organisations, while distancing the accountability of public sector organisations.

An additional driver to consider is climate/environmental change as this impacts upon other drivers, particularly fiscal constraints and demographic change; built environment risks around natural disaster protection; ensuring physical and virtual accessibility to education and internet connectivity; and communities needing to relocate to mitigate risks posed by sea level rise and inundation.

Reference: Ako Aotearoa. (2025). *Manako briefing paper: Tertiary education and Pacific—Foundation to leadership and beyond the horizon*. National Centre for Tertiary Teaching Excellence. Retrieved from https://ako.ac.nz/assets/Manako/Briefing-papers/Manako-Briefing-Paper-Tertiary-education-and-Pacific-Foundation-to-leadership-and-beyond-the-horizon.pdf

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

- The priorities are only for the current and medium-term. For a strong strategy, it is important to consider the **long-term vision and strategy implementation** and to help ensure a high-quality sector response that delivers on the TES priorities for quality teaching and learning for all learners and to enable them to contribute well to their future workplaces, whānau, iwi, communities and prosperity.

- **International Education:** IE is rightly identified as important for growth but it risks being framed only as an export industry. The priority for International Education should emphasise intercultural learning, reciprocal exchange, and contributions to Pacific and indigenous development and all that IE helps learners to achieve.

- **Equity and Inclusion:** This should be a standalone priority and have strengths-based framing for 'under-served' learners. Māori, Pacific, Disabled and Neurodiverse learners were recognised as **'priority learners'** in the previous TES. Using the right words matters as this wording has a much more positive framing than the wording "underserved learners". Mental health, wellbeing and pastoral care are also critical requirements to support learner success.

- **Retention of talent would be a beneficial priority:** If more younger people stayed in NZ versus going overseas, the risks associated with an ageing population would be mitigated by a more diverse and balanced (in terms of age) population. Talent provides opportunities for innovation and ideation, and contributes to positive outcomes economically, environmentally and for society. Retaining people in New Zealand increases tax revenue and encourages whanau to remain in their preferred locations. This flows on positively to develop rural and regional businesses and would go some way to repairing fractured and isolated communities and reducing the loss of cultural heritage and connections.

- **Digital capability and Lifelong Learning:** Digital capability should be an additional priority, as well as Lifelong Learning (which includes upskilling). A dedicated focus on digital skills, adaptability, and lifelong learning would help reinforce the system's ability to support retraining and resilience across people's working lives. In the draft document, technology is identified as a driver but is not as a priority or fundamental educational requirement as it should be.

- **Digital Divide for Māori, Pacific, and Rural Communities:** These groups and communities in New Zealand face significant challenges accessing education and technology due to a combination of socioeconomic barriers, digital divides, and systemic issues. Key challenges include the high cost of devices and internet connectivity, lack of digital literacy and skills, lower representation in technology-focused education and jobs, insufficient culturally appropriate resources and curriculum, and a general lack of access to high-speed internet.

- **Sustainability and climate change -** International tertiary strategies identify green economy, climate adaptation and environment as priorities. Including these priorities in the NZ context would help align the TES with international strategies and the role of tertiary education in meeting climate change emissions goals.

4. Our feedback on the individual TES priorities for the tertiary education sector.

Achievement	
To what extent do you agree that Achievement should be a priority in the TES?	• Strongly agree (with caveats - see comments) • Agree • Neutral • Disagree • Strongly disagree
Comments	While we strongly agree with this statement, there are caveats to note as achievement measures must be understood through cultural, social, diverse neuro-abilities, and geographic equity lenses. Monitoring should also ensure quality and relevance is not just about credential completion, as systemic barriers should also be accounted for, especially for low-income learner groups with disparities in social and economic equity and who may be underserved due to challenges of remote geographic locations. Māori, Pacific, and rural communities in New Zealand face significant challenges accessing education and technology due to a combination of socioeconomic barriers, digital divides, and systemic issues. Key challenges include the high cost of devices and internet connectivity, lack of digital literacy and skills, lower representation in technology-focused education and jobs, insufficient culturally appropriate resources and curriculum, and a lack of access to high-speed internet.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	This priority for "achievement" may be bound by the limitations of educator awareness. There appears to be no provision for specialist and well-trained career guidance professionals to ensure all learners are provided with career aspirations that are not locked into educators' outlooks or limited by local/regional/national ideas or made through assumption. Continuing and wider access to the TEC funding for 'learner success' programmes across all institutions of Aotearoa New Zealand would be beneficial, particularly for underserved learner groups such as neurodiverse, Māori, Pacific and those from low-income backgrounds. These programmes and others like them have highly positive outcomes for learners as demonstrated by improvements for both course and qualification completions.
Do you have suggestions for additional activities to support this priority?	Please define what "distance travelled" means and how to develop and apply it. We assume that distance travelled is about the growth of the learning over time, especially in relation to a learner's starting point. It is good to acknowledge and celebrate individual development for students who may face systemic or personal barriers there are other ways to do this. A further positive framing is to focus on engaging community support and the intergenerational and collective experience and connections to scaffold and uplift learners' achievements and success.

Economic Impact and Innovation	
To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Key priorities for New Zealand's tertiary education system that impact on economic growth and innovation include: Expanding access to relevant qualifications that lead to meaningful and well paid careers; equipping learners with adaptable skills and supporting research that drives innovation and commercialisation; Strengthening strong collaboration between providers and industries to ensure alignment with workforce needs; Supporting the international education sector to enhance global engagement and economic contribution. Organisations that had gained very good traction in this way over past few years – the Workforce Development Councils and the Centres of Vocational Excellence – gained expertise and provided legacy resources that must contribute to the evidence base. It is concerning and unclear what will happen with these valuable resources once these entities close.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Page 10, paragraph 8 states "Foundation education providers should consider local industry needs to connect students and trainees with employment opportunities". This is a damaging assumption that foundation learners should only be tied to the limitations of local industry. This reduces the horizons and aspirations of foundation learners, compounding the inequities they experience. Foundation learners and their families have been under-served throughout the education system for generations, and often occurring alongside the residual impacts of intergenerational trauma and economic challenges. Many learners within foundation learning are neurodivergent and the strengths of this community significantly match the future workforce requirements as listed in the draft TES document. While there is a place for local connections, it should not be the only focus.
Do you have suggestions for additional activities to support this priority?	Digital literacy and capability must be actively supported. Incentives and targeted funding should be provided to education providers to deliver flexible, career-stage learning opportunities that support learners at all levels. While this priority acknowledges the importance of the Māori economy, it should also explicitly recognise the growing Pacific economy and its value to Aotearoa New Zealand. The provision of tertiary education must be responsive to Pacific-led enterprises and innovation, ensuring that Pacific learners, educators, and researchers are empowered to contribute to and benefit from economic transformation.

Access and Participation	
To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	We strongly agree that tertiary education must be accessible to people from all backgrounds. It should enable individuals to build the skills they need to thrive in both work and life. This includes those who are currently underserved and lack access to education. Ensuring equitable access means actively removing barriers and creating opportunities that reflect the diverse needs and aspirations of all learners.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	Affordability and financial support are critical for low-income and priority learners, particularly due to the burden of study related debt and high living costs. To improve access and participation, the system must offer flexible pathways and qualifications that allow learners to re-enter study or transition to work without committing to long traditional programmes. The importance of wrap-around learner support for participation needs explicit attention. Participation alone is not enough. It must be matched with improved retention, completion and successful transitions into employment, especially for Māori and Pacific learners, to ensure access translates into success and long-term impact. Adult and Community Education (ACE) plays a vital role in supporting access and participation in tertiary education. It helps individuals develop foundational learning skills and confidence and often serving as a first step back into education. ACE fosters social cohesion, encourages civic engagement, and provides second-chance learners with meaningful and successful educational experiences. To strengthen community wellbeing and promote lifelong learning, greater focus and investment in adult and community education is needed in the strategy. This will support expanding opportunities, improving pathways into further study or employment, and ensuring programmes are responsive to the diverse needs of learners.

Integration and Collaboration	
To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	We agree that integration and collaboration are very important. This is especially the case with the transitions that occur to and from tertiary education and the transitions within it.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	We recommend you remove the word "realm" as it could be viewed as negative due to colonial cultural impacts, for example, for Indo-Pacific, Asian communities.
Do you have suggestions for additional activities to support this priority?	Stronger collaboration mechanisms are needed to ensure providers and communities learn from one another, and that evidence is systematically used to improve practice. While this priority is strong on iwi/hapū, it appears silent on Pacific learner priorities, when this is rapidly growing demographically. New Zealand's tertiary system needs to be connected to Pacific regional development priorities. Partnerships with Pacific communities and organisations will be critical to support learners' goals and strengthen Pacific research capability. All TEOs could collaborate on research for and by TEOs from the tertiary education sectors, not just the universities. The future lives of New Zealanders will ultimately be shaped by demographic shifts, a rapidly changing economy influenced by global trends like climate change and technological innovation, and a diverse society with increasing urbanisation. Key challenges include mitigating the severe impacts of climate change, addressing significant housing and infrastructure deficits, overcoming entrenched health inequalities for Māori and Pacific peoples, navigating global geopolitical and economic shifts, and fostering long-term, adaptive policymaking to ensure national prosperity and positive outcomes for people's lives.

International Education	
To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • **Agree** • **Neutral** • **Disagree** • **Strongly disagree**
Comments	New Zealand relies on temporary migrants more than most other OECD countries, with a large proportion of the workforce in some industries made up of people on temporary visas. Continuing education and on job training will continue to be crucial to support the future workforces of New Zealand as the New Zealand population is aging due to demographic shifts with correlating migration demand to fill skill shortages "…from highly specialized roles in IT and healthcare to lower-skilled positions in aged care and hospitality. New Zealand will rely ever more on mutually beneficial international relationships to attract and retain learners from beyond our borders and to contribute to successful futures for them, their whānau and communities and for Aotearoa New Zealand as a whole.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	The primary Government focus areas signalled for tertiary education for 2025 and beyond includes lifting achievement, maximizing economic impact through relevant skills, increasing access, deepening collaboration, and boosting international education. International education should ensure all people can experience positive outcomes through tertiary education they might experience, through excellent and capable teaching and learning facilitators, teachers and researchers sharing knowledge on how to ensure successful outcomes for the full diversity of learners and ākonga into and through tertiary education and lifelong learning.
Do you have suggestions for additional activities to support this priority?	It is important to set priorities beyond export revenue and global competitiveness; it should also create opportunities for Iwi Māori and Pacific-centered organisations and learners to engage in indigenous-to-indigenous exchanges to establish long-term relationships for community and business development through economic, social and environmental partnerships and for the benefit of Aotearoa New Zealand as a whole.

System Delivery	
Provider or Agency Type	**Comments on roles and expectations**
Universities	Ensuring learner success for the full diversity of learners through setting and supporting high quality ako teaching and learning outcomes within the universities and for learners transitioning successfully from schools, workplaces, and other tertiary institutions for a high-quality university-based education.
Wānanga	Ensuring ākonga learner success particularly for Tangata Whenua and Māori learners and for the full diversity of ākonga learners by setting and supporting high quality ako teaching and learning outcomes within the wānanga and for learners transitioning successfully from schools, workplaces, and other tertiary institutions for a high-quality wānanga based education.
Polytechnics	Ensuring learner success for the full diversity of learners through setting and supporting high quality ako teaching and learning outcomes within the Polytechnics and for learners transitioning successfully from schools, workplaces, and other tertiary institutions for a polytechnic based high quality education.
Private Training Establishments (PTEs)	Ensuring learner success for the full diversity of learners through setting and supporting high quality ako teaching and learning outcomes within the Private Training Establishments for learners transitioning successfully from schools, workplaces, and other tertiary institutions for a PTE based high quality education.
Industry Skills Bodies (ISBs)	Ensuring learner success for the full diversity of learners through setting and supporting high quality ako teaching and learning outcomes within Industry Skills Bodies (ISBs) for learners transitioning successfully from schools, workplaces, and other tertiary institutions for a PTE based high quality education.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	Be proud of our tertiary education system and the leaders and full diversity of educators throughout the system that do well by their ākonga / learners and the communities, business and industries that they will contribute to as graduates and continuous learners. Ensuring learner success through policy and funding settings that enhance and tertiary education for the full diversity of learners through setting and supporting high quality ako teaching and learning outcomes within national strategies and any related international agreements.
Other (please specify)	Ako Aotearoa appreciates the Ministry of Education's call to action to tertiary education stakeholders such as us to share ideas on improving outcomes for learners, educators, Tertiary Education Organisations and wider society. For inquiries or questions on our submission please contact Ako Aotearoa via this email: info@ako.ac.nz

Monitoring Outcomes – TES priorities

Here are our comments on the proposed approach to monitoring progress against the TES priorities and suggestions for how progress could be monitored, including additional indicators.

- **We support the inclusion of outcomes with a wider focus.** The draft document rightly proposes the outcomes and success measures; however, most indicators are **narrowly** focused on economic outputs – completions, export revenue etc. This risks overlooking broader contributions essential to ensure both a civil and productive society. This is supported by ensuring learner equity and success for priority learner groups, knowledge exchange, cultural exchange, social cohesion, wellbeing and environmental sustainability and ground-breaking collaborations for innovation.

- **Balance scorecard approach.** It is essential to track and monitor wellbeing and learner engagement as part of system performance. The approach needs to include measures to incentivise reduced disparities for Māori, Pacific, disabled learners and those low-income groups. Insights into localised and grass-root realities are as important as high-level indicators, and there are many SMART options for monitoring trends and exploring whole organisation approaches to ensuring all learners can succeed. We commend the Tertiary Education Commission for its continued focus on expecting progressively improved outcomes for all learners in tertiary education and training. Ako Aotearoa would welcome the continuation of sector funding for learner success initiatives.

- **Qualitative, learner-centred evidence** needs to be considered as well (learner voice, employer feedback, educator capability effects, whanau perspectives etc.). Hard reliance on completions and graduate earnings will skew provider behaviours (and underserved learners might get ignored in the process).

- **Equity lens:** Disaggregate all measures by ethnicity, gender, disability, income background, and region. This will help policymakers to spot disparities, target support and track progress (closing the gaps). Different dimensions that can support this disaggregation include ethnicity, gender, disability, income backgrounds, regions etc to see how different groups are experiencing the system as areas of priority focus.

- **Coordinated approach**: A consistent **national framework** would ensure comparability and accountability across the sector. Findings should be shared transparently to inform continuous learning.

- **Cross-sector data use and transparency to support system learning:** Monitoring and evaluation should be consistent across providers (however realistic this could be), data dashboards should be publicly available so smaller providers can do their own internal analyses using the nation-wide data sets readily available.

- **Flexible, stackable pathways:** In the proposed TES it is wrongly assumed that a learner pursues only one educational or training pathway, thus limiting future choice and flexibility. Cross-sector skills capability and transferability and tracking the associated data to improve connection and identify gaps and opportunities, is essential to educating learners to be ready for the future.

Final Comments

Do you have any other comments on the draft Tertiary Education Strategy?

The monitoring framework refers to underserved groups in general, but to ensure that equity is a core indicator of TES success, it should include success measures that explicitly track outcomes for Māori and Pacific learners across achievement, access, participation, and progression into meaningful employment. The draft TES includes elements of cultural capability, but they are fragmented and implicit. They show up mainly in relation to Māori aspirations, kaupapa Māori provision, and equity for underserved groups. However, there is no overarching statement that cultural capability is a core system expectation — unlike some earlier TES versions (e.g. 2020 TES, which explicitly included "cultural competence of staff" as a driver of Māori/Pacific learner success). We strongly endorse the Tertiary Education Commission's work to date to set strong expectations for TEOs to improve learner success and would encourage the TEC to continue to do this important work particularly to TEOs that are underperforming in this space.

Strengthening National Coordination for Teaching Excellence and Sector Capability

The potential disestablishment of Ako Aotearoa due to funding withdrawal poses a significant risk to the sector's ability to deliver on TES priorities. Without a neutral, trusted national body to coordinate teaching excellence and capability development, the sector risks:

- Fragmentation of professional development efforts.
- Reduced support for small and regional providers.
- Missed opportunities to scale innovative, equity-focused practices.

Ako Aotearoa is uniquely positioned to lead this work, given its longstanding role and track record in supporting tertiary education sector teaching excellence across universities, wānanga, vocational education in the ITP sector, and private training establishments.

Through our programmes and services tertiary educators have access to high quality training and skills to embed inclusive practices for the success of all learners, particularly Neurodiverse, Māori, Pacific and other underserved learner groups.

Ako Aotearoa recommends that the new Tertiary Education Strategy include a nationally coordinated approach to support and provide services for the professional learning and development of educators through evidence-based research, resources and sector advocacy.

This will focus on services to improve the quality of the tertiary education system through teaching and learning to deliver equitable, and future-focused learning for the diversity of learners, students and ākonga in Aotearoa New Zealand.

This approach must be informed by place-based, high-quality evidence and be responsive to the diverse needs of learners and providers across Aotearoa New Zealand.

This recommendation for a nationally coordinated focus on the quality of tertiary education and training supports the Ministry's strategic goals by:

- Lifting achievement: Enhancing educator capability to improve learner outcomes, especially for Māori, Pacific, disabled, and other learners underserved by the current system.
- Increasing access and participation: Supporting inclusive, culturally responsive teaching and learning practices.
- Deepening collaboration: Facilitating cross-sector partnerships and knowledge-sharing.
- Maximising innovation and economic impact: Enabling evidence-informed teaching that supports workforce development and economic transformation.

AKO AOTEAROA

RECOMMENDED ACTIONS

FOR THE NEW TERTIARY EDUCATION STRATEGY

1. Embed national and regional coordination of teaching excellence within the Tertiary Education Strategy Implementation Framework.
2. Ensure alignment with the Tertiary Research Excellence Fund, learner success initiatives, and performance measurement systems.
3. Reinstate and secure long-term funding for Ako Aotearoa or a similar independent entity focused on providing services to support quality teaching for improved learner outcomes through tertiary education organisations and teaching quality programmes that enhance learner agency and success outcomes.
4. Ensure that the Government's tertiary education and training policy and monitoring sets and upholds high expectations for quality teaching and learning outcomes by recognising the value this has for ensuring ākonga/learner success for the full diversity of learners in partnership with tertiary education organisations and educators committed to high quality teaching and learning approaches and systems.

Nā āheitanga ā-mātauranga,
ko angitū ā-ākonga
Building educational capability
for learner success

Ako
AOTEAROA

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Submission on the draft Tertiary Education Strategy (TES) September 2025

This submission is made on behalf of Auckland University of Technology. It provides general points of feedback on the draft TES and responses to the specified consultation questions.
For further information, please contact:
9(2)(a) @aut.ac.nz

General feedback

1. AUT supports the proposed priorities. *Integration and Collaboration* could be embedded within the other priorities, rather than standing alone.
2. We agree with the Government's intentions to:
    - create a more equitable future;
    - broaden the diversity of the educated workforce;
    - make learning more accessible to all;
    - mitigate the impacts of climate change; and
    - support the nation through this period of technological change.
3. We strongly support the increased emphasis on research that was embedded throughout the draft TES.
4. There are several aspects of the current draft that could be strengthened to improve its impact and chances of successful implementation:
    - To create an advanced economy, TEOs will need to be much more adaptable. This also applies to the systems that regulate them. Although the draft TES has plenty of examples of how TEOs can change, it is largely silent on Government's role in creating a more innovative and responsive tertiary sector.
    - There are some instances of misalignment between the stated priorities and current government policy. In particular, the TES would be strengthened by indicating how these priorities will be upheld regardless of the funding made available in the Appropriation.
    - The draft TES must acknowledge that the level of ambition a TEO has in meeting the objectives of the TES is directly related to its overall financial position and more broadly the financial wellbeing of the system;
    - The TES does not have a specified timeframe but refers to being for the medium-term. Universities are typically funded for a shorter term (of up to three years). We also have growing reporting and compliance activities, and new expectations like learner success and disability action plans. It may be that a TEO will need to focus on some of the TES priorities rather than others, over a three-year window; and
    - Many of the actions and expected changes listed in this document are already underway. It is unclear whether current initiatives are insufficient, or whether this is an endorsement that providers should continue with their current course of action. This could be remedied by the grouping of initiatives into 'new' and 'continuing' objectives.

Detailed feedback and answers to the relevant consultation questions are provided below.

Section	Response
1. Achievement	**To what extent do you agree that *Achievement* should be a priority in the TES?** AUT strongly supports having achievement as a core priority. We also support the more nuanced understanding of success presented in the draft. The proposed move to measure the value added by tertiary education, or the distance travelled by the student, is long overdue. Together with qualification completion, these are true drivers of social mobility and economic development.
	To what extent will the expected changes and contributing activities effectively achieve the priority? AUT supports the proposed change to measuring distance travelled. It is important that this is clearly and appropriately defined, as well as reasonably easy to calculate and predict. Largely, the contributing activities are consistent with current work to lift learner success. It would be beneficial to note how the Government Agency roles (noted in the section called 'Delivering the Strategy') contribute to achievement of the priority. For example: • How equity funding settings would change to support a student profile based on distance travelled • Provider access to the relevant IDI data to help understand their own impacts, and opportunities for improvement. • Addressing known system barriers to qualification achievement, such as provision of paid placements in critical areas like teaching and clinical health programmes • A review of student loans and allowances to mitigate growing cost of living concerns
2. Economic impact and innovation	**To what extent do you agree that *Economic impact and innovation* should be a priority in the TES?** While important, economic impact and innovation are not the only critical outcomes of learning, teaching, and research. This section of the TES should be broadened to 1) acknowledge the important role of universities to the knowledge economy (such as in knowledge creation/research and the training of the scientific and research workforce) and 2) recognise the importance of New Zealand universities' contributions globally. The current section is inwardly focussed on supporting New Zealand's economic needs, but universities operate within a global system in terms of attracting and retaining students and academics, and collaborating for mutual benefit and research impact. AUT would recommend a more balanced approach which also acknowledges the many wicked problems that threaten or constrain growth, and which are understood and solved through research activities. An approach that supported the aims of the TES would value social

Section	Response
	and environmental impact alongside the economic. Again, the draft would benefit from some acknowledgement of the work that has been done to date, as well as the systemic barriers to translating research into real-world impact (see below). From a learning and teaching perspective, AUT supports the emphasis on graduates developing transferable skills. The learning and teaching approaches are in line with AUT's intentions.
	To what extent will the expected changes and contributing activities effectively achieve the priority? AUT recommends further development here. The draft TES should address the reality of the prevailing research environment and economic climate. Our relatively low national investment in R&D (from both industry and Government) is a complex issue that will not be solved simply by promoting knowledge transfer, introducing enhanced commercialisation processes, or increasing our focus on user-initiated research. A more nuanced approach, similar to that of Priority 1 Achievement, would recognise and provide examples of how Government, industries, and the universities could work together, especially to bridge existing funding gaps. Some examples of actions that would strengthen the TES, boost innovation and knowledge transfer, and strategically lift Government investment in R&D are: • Provide base funding for technology transfer offices at each university; • Heavily weight end-user-led research income from contracts with New Zealand-based, non-grant-funding organisations (including businesses, NGOs, and government agencies); and • Reinstate strategic funding streams such as R&D fellowships for masters and doctoral students, and grants for New Zealand businesses and NGOs working with universities and public research organisations
3. Access and participation	**To what extent do you agree that *Access and participation* should be a priority in the TES?** AUT is a university of technology and opportunity. We strongly agree that access and participation should be a key component of the TES, especially for under-served communities where we know a university education will provide a stronger economic outcome (e.g. earnings premium) and social uplift for New Zealand. Current Government constraints on Vote Tertiary are likely to affect participation rates, particularly for more marginalised student cohorts. The draft TES signals access and

Section	Response
	participation as one of the five core priorities, but would need to be accounted for in the Appropriation in order to achieve this.
	To what extent will the expected changes and contributing activities effectively achieve the priority? Many of the expected changes and contributing activities are already underway across the sector. This makes the current section largely redundant. Acknowledging the work that has been done to date and identifying the specific actions required by each contributor may make this section more useful.
4. Integration and collaboration	AUT supports UNZ's recommendation that this priority be embedded across the other four.
5. International education	**To what extent do you agree that *International education* should be a priority in the TES?** International education is clearly a high priority for the tertiary sector. This section addresses some of its wider benefits, including strengthening partnerships, sharing Aotearoa New Zealand's values with the world, and broadening the experiences of domestic students. However, its core focus is on the economic benefits of export education and as such has a different tone to the remainder of the document. AUT supports UNZ's recommendation of a strategy that is jointly developed between Government and the sector. In addition, the draft lacks actions or expected changes that relate to the wider contribution of export education. At present, the potential economic returns take primacy over any other benefits.
Provider roles and expectations	**Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering on the TES?** We agree with the proposed roles and responsibilities, although recommend that the university section includes academic freedom alongside our role as critic and conscience of society. Again, it would be helpful to differentiate between new expectations and long-standing ones. The TES would be more effective if examples of these roles and responsibilities for Government Agency Roles were included within each Priority section.
Monitoring performance	**Do you have any comments on the proposed approach to monitoring progress against the new TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.** We strongly agree with developing a wider suite of measures to monitor performance, especially those that will measure distance travelled and outcomes that support employment while not resulting in a formal qualification. Some suggestions include: - Hours worked during study (an indication of the student's current financial situation)

Section	Response
	- Five- and ten-year outcomes (earnings or employment) for students who completed part of a qualification (an indication of whether it has been helpful, even if they did not graduate) - Five- and ten-year outcomes (earnings or employment) for students based on NCEA rank score (or equivalent) - Five- and ten-year outcomes (earnings or employment) for school leavers who completed a tertiary qualification, based on their school's EQI score Whichever indicators are selected, it is important that the sector is closely involved in their development, that they are used to highlight opportunities for improvement, and the data are shared with the relevant provider so they can enhance their learner success plans. More broadly, an education sector-wide approach is also needed to remove barriers for under-served communities; educational disadvantage is a complex matter that begins long before a student reaches tertiary age.

Aviation
INDUSTRY
ASSOCIATION

Submission on the

Draft Tertiary Education Strategy 2025

September 2025

About us

1. The Aviation Industry Association (AIANZ) is the peak membership body that represents the interest of the commercial aviation industry in New Zealand. Founded in 1950, its overall goal is to and support a safe, sustainable, and resilient sector in New Zealand. So, while safety is front and centre of everything we do, we also enable our members and the wider aviation sector to grow and innovate.

2. The membership of the organisation includes more than 200 operators from small to large who operate aircraft in many sectors of the industry. They include flight and ground training, agriculture, scheduled and charter air transport services, freight, photography, search and rescue, surveillance, and tourism. Our membership also includes companies that service, maintain, design or manufacture for these sectors, including engineers. In more recent times, unmanned aerial vehicles (UAVs) or drones have become an important part of AIANZ's diverse membership.

3. New Zealand has the most aircraft per capita in the world that are integral to our economy and for traversing NZ's terrain in a brief period. The high number of helicopters, for example, have been vital to the swift response to Cyclone Gabrielle and the Kaikoura earthquake in 2016. There are 4,600 aircraft and 900 helicopters operating in New Zealand. This represents one aircraft for every 1,120 people and one helicopter for every 5,700 people.

4. Our role is primarily a policy one that is supported by evidence-based advocacy and lobbying to Government and their agencies. We support members in regulatory matters, advancing professionalism in all safety matters while being recognised as the voice of the country's commercial aviation industry.

5. The Association itself is organised into six divisions which are:

    a. New Zealand Agricultural Aviation Association (NZAAA)
    b. New Zealand Helicopter Association (NZHA)
    c. Unmanned Aerial Vehicles Association (UAVNZ)
    d. Training and Development
    e. Supply, Service and Engineering that includes the Aircraft Engineers
    f. Association (AEANZ)
    g. Operations (including scheduled airlines and tourist flight operators).

Commentary

6. We support the draft objective for tertiary education and believe it sets the right direction for a system that enables New Zealanders to thrive. However, we recommend explicit recognition of safety-critical professions, including pilots, aircraft engineers, and UAV (drone) operators. Training in these professions leads directly to regulated licences and certifications that are essential not only to individual career success but also to public safety, national connectivity, and economic productivity. Aviation is a sector where the outcomes of tertiary education go beyond individual employment and directly underpin the functioning of the wider economy.

7. We agree with the drivers of change identified in the draft strategy, and aviation provides clear and practical examples of these. Technological change is rapidly reshaping aviation, through advances in autonomy, digitalisation, and sustainable propulsion systems. Global competition affects aviation training, particularly in attracting and retaining international students. Demographic shifts also require the sector to focus on building stronger Māori, Pacific, and regional participation. We recommend adding explicit recognition of the role of regulatory competence pipelines, particularly the Civil Aviation Authority licensing requirements for pilots, engineers, and UAV operators. Aviation also plays a unique role in regional development through airports, training schools, and maintenance hubs, and this should be reflected in the TES.

8. We suggest the TES should include an explicit focus on safety-critical vocational training sectors. These areas require training that is capital-intensive and tied to strict regulatory frameworks, yet they are essential to the functioning of the economy and public safety. Aviation training should be recognised in this category to ensure appropriate support is in place. Furthermore, TES should acknowledge the specialised technical training costs of aviation, including simulator time, flight hours, and engineering workshops, which are significantly higher than in many other vocational sectors.

9. **Achievement**, we strongly agree that achievement should be a priority in the TES. The proposed focus on “distance travelled” and employment outcomes is welcome, but for aviation it is critical that licence, rating, and certification attainment are recognised as achievement indicators in their own right. Aviation qualifications are tied directly to regulatory requirements and industry expectations and therefore provide a clear and measurable link to employment. We also recommend that provider performance be monitored not only through completions but also through employment outcomes, regulatory compliance, and industry satisfaction. Supporting achievement in aviation requires recognition of the additional costs and infrastructure needed to deliver high-quality training in a safety-critical environment.

10. **Economic Impact and Innovation**, we strongly agree that economic impact and innovation should be a priority for the tertiary system. Aviation contributes significantly to New Zealand’s productivity through its roles in transport, tourism, freight, emergency services,

and defence. The aviation engineering and maintenance workforce is in critical shortage, and TES must prioritise workforce development in these areas. Aviation also drives innovation in sustainability, automation, and advanced safety systems. We recommend the development of aviation and UAV micro-credentials in emerging areas such as beyond visual line of sight (BVLOS) operations, night flying, avionics, and hybrid propulsion. Further, research partnerships in sustainable aviation, safety technology, and autonomy should be supported as part of the innovation agenda. Aviation must also be fully integrated into the work of the Industry Skills Boards to ensure training and qualifications remain responsive to workforce needs.

11. **Access and Participation**, we strongly agree with the emphasis on access and participation. Aviation training is concentrated in regional centres and contributes significantly to local economies. Recognising aviation as a regional enabler is essential to supporting broader access and economic development. Aviation pathways must be made clearer and more accessible to Māori, Pacific, disabled, and regional learners. Secondary-to-tertiary pathways into pilot, engineering, and UAV careers need strengthening, and funding models must account for the high cost of aviation training. Without explicit recognition of these unique cost drivers, access for under-served groups will remain limited.

12. **Integration and Collaboration,** we strongly agree with this priority. Aviation already demonstrates strong collaboration between providers, employers, and regulators, and TES should build on these existing strengths. The aviation sector should be guaranteed representation on the new Industry Skills Boards, given the safety-critical and export-facing nature of the industry. We also see opportunities for formal airport–iwi–provider compacts, which would align regional training provision with local economic and community needs. Collaboration across flight schools, engineering providers, and UAV training organisations should be further supported to create a more integrated system that meets the diverse needs of learners and employers.

13. **International Education**, we strongly agree that international education should be a priority, and aviation training should be recognised as one of New Zealand's most valuable export education sectors. Pilot training, engineering qualifications, and UAV courses are globally sought after, and New Zealand has a strong reputation for safety and quality. TES should prioritise aviation within the International Education Going for Growth Plan, positioning New Zealand as a trusted global aviation training hub. At the same time, it is critical that New Zealand's quality and safety standards are safeguarded so that our reputation is maintained. Aviation's contribution to international education also extends beyond training, as it connects into research, innovation, and industry partnerships.

14. **Roles and Expectations**, we support the draft roles and expectations for different parts of the tertiary system but recommend clearer recognition of aviation within each. Universities should partner with aviation in sustainable aviation research and innovation. Wānanga can provide culturally grounded pathways into aviation careers for Māori learners. Polytechnics should sustain regional engineering and maintenance provision. Private Training

Establishments deliver specialised flight and UAV training and need recognition of the higher costs associated with regulatory compliance. Industry Skills Boards must include aviation explicitly to ensure qualifications are fit-for-purpose. Relevant government agencies should ensure funding and approvals reflect the safety-critical and capital-intensive nature of aviation training.

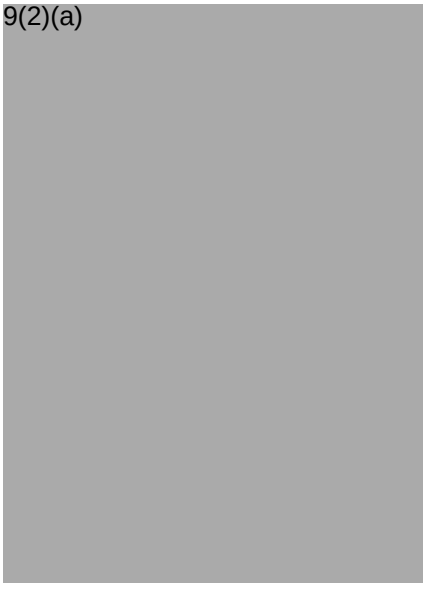
15. **Monitoring Outcomes**, we support the proposed approach to monitoring TES outcomes but recommend adding aviation-specific indicators. These should include licence and certification attainment rates across pilots, engineers, and UAV operators; graduate employment rates in safety-critical aviation roles; and industry and regulatory satisfaction, including feedback from the Civil Aviation Authority and employers. These measures will ensure monitoring captures the unique regulatory and workforce outcomes that define success in aviation.

16. Aviation, encompassing pilots, aircraft engineers, and UAV operators, is a nationally critical, export-facing sector that aligns closely with the objectives and priorities of the TES. Aviation training produces measurable outcomes, contributes to productivity and innovation, supports regional economies, and is a high-value international education export. We request explicit recognition of aviation in the final TES and support for the sector's unique training, regulatory, and workforce requirements. This will ensure New Zealand remains globally competitive, nationally resilient, and able to meet its safety and economic obligations into the future.

17. The Aviation Action Plan (AAP), launched on 16 September 2025, the AAP includes specific actions relating to education and training. The Ministry of Education should be cognisant of the actions in the AAP that they have been assigned, in order that progress is made in this important workforce area.

End

9(2)(a)



Aviation Industry Association (AIANZ)

Submission by

BusinessNZ

GROWING PROSPERITY AND POTENTIAL

to the

Ministry of Education

on the

Draft Tertiary Education Strategy

30 September 2025

SUBMISSION BY BUSINESS NEW ZEALAND ON THE DRAFT TERTIARY EDUCATION STRATEGY

1. INTRODUCTION

BusinessNZ[1] welcomes the opportunity to make a submission on the draft Tertiary Education Strategy. BusinessNZ strongly supports the direction of strategic change and provides some further recommendations and context to ensure the strategy can be implemented effectively.

RECOMMENDATIONS

BusinessNZ recommends:

- The strategy is adopted as per the draft consultation document.
- Additional contributing activities:
    - Investigate new strategies for embedding intensive literacy and numeracy into vocational education to enable concurrent development of skills and utilisation of applied learning, to raise foundation skills in the workforce as necessary.
    - Consider a broader range of achievement measures, including learners continuing their qualification and learning in different environments (shifting from provider- to work-based learning; moving from online- to provider-based courses; transitioning successfully to sustainable employment in the field of study).
    - Achievement is more broadly defined in line with OECD and European Qualification Framework objectives of having the technical skills, knowledge and competency required for employment, rather than just obtaining a qualification.
    - The TES to develop system monitoring to support educational quality at scale, and tailor education to individual learning needs while maintaining benchmarks of achievement.
    - Increase cross-agency coordination and strengthen professional feedback loops by considering occupational licencing outcomes attached to qualifications as part of the monitoring framework, alongside Ministry for Regulation reviews of occupational licencing settings, with the view that qualifications should be a trusted testament to professional competency.
    - Consider a broader range of economic monitoring measures to understand the impact of tertiary education on economic growth. These could include:
        - Labour market outcomes: graduate employment rates, graduate earnings premiums, underutilisation/skills mismatches, employment resilience.
        - Skills relevance and utilisation: employer and industry surveys, OECD PIAAC, work-based learning participation.
        - Innovation and research impact: research commercialisation, external research income, knowledge diffusion.
        - Labour productivity measures.
    - Strengthen public information about the value and opportunities from qualifications to ensure well-informed decision making about training and higher education.
    - Align social development and tertiary education outcomes to recognise a longer pathway to employment may be an appropriate outcome for those pursuing higher-skilled qualifications, over immediate job placement.

[11] Background information on BusinessNZ is attached as Appendix 1.

- Create ambition in the tertiary education sector to explore international education opportunities.
- Scope the availability to create a real-time, publicly available skill supply tracker (akin to GDPLive.net) that would better signal to industry where pools of skilled workers may be available, to inform recruitment and training activities of firms, and improve education and industry signalling.
- Use the investment plan in a more nuanced and strategic way to drive the TES priorities.

2.0 COMMENT

2.1 BusinessNZ strongly supports the draft Tertiary Education Strategy and alignment of the tertiary education sector to economic growth and social prosperity. There is significant opportunity to better coordinate government policy across tertiary education, science and innovation, economic and social policies to ensure the tertiary education system is responsive to workforce and innovation needs.

2.2 BusinessNZ acknowledges the vital function of the Tertiary Education Strategy to bring coherence to multiple co-dependent work programmes across the education system. In particular, it must ensure clear alignment between the NCEA reforms in schools, the ongoing reform of vocational education and training, and the evolving university and research system. These reforms are occurring against a backdrop of significant economic challenges and shifting workforce demands, making it critical that the TES articulates a pathway where education not only meets labour market needs and assists the productivity agenda, but also provides opportunities to equip individuals with the relevant skills they need to succeed. A well-designed TES serves both as a coordinating instrument for policy and as a signal of national priorities linking aspiration, business demand for skills, and New Zealand's wider productivity and economic growth goals.

2.3 BusinessNZ recognises the inherent tension in the tertiary sector being predominantly government funded and strategically directed, yet expected to operate with full institutional autonomy. Striking the right balance between autonomy and accountability is essential to preserve academic independence while ensuring the sector delivers on national priorities. In practice, the government's primary levers are policy settings, funding mechanisms, and system-level monitoring, which together determine how effectively the strategy can be implemented. The design of these levers, including alignment of funding incentives, robustness of performance measures, and quality of monitoring and evaluation will be critical in determining whether the TES achieves its objectives.

3.0 Comment: the strategic priorities of the TES

Priority 1 - Achievement

3.1 BusinessNZ agrees that achievement must be a central priority for the tertiary education system. We acknowledge the emphasis in the draft TES that achievement extends beyond enrolment to successful completion and the acquisition of meaningful skills and qualifications. A first step in improving achievement is ensuring learners have access to high-quality publicly-available information that guides their decision making, supports clear pathways, and helps them select programmes that best align with their aspirations and abilities. Informed choice will help learners enter programmes where they are most likely to succeed, while ensuring closer alignment with labour market needs.

3.2 We note the Government's current reliance on Educational Performance Indicators (EPIs) as the primary measure of achievement. While useful as a baseline, EPIs are no longer fit for purpose for reflecting the broader view of achievement outlined in the TES. The system must measure not only whether a qualification is completed, but also whether the education provided is of high quality, supports and stretches learners, and ensures the relevance of skills for the workforce. There is a risk that completion-focused measures incentivise providers to pass students rather than investing in robust teaching and support. Existing quality assurance mechanisms are insufficient to distinguish genuine learning gains from lowered standards. This risk is underscored by achievement results in the compulsory education sector, where high qualification achievement has coincided with poor literacy and numeracy outcomes.

3.3 The tertiary system needs to be refocused on excellence at every level, with higher aspirations for systematically lifting standards in education. This means not only supporting learners to succeed but setting expectations that stretch and challenge them to achieve more. For adult learners in particular, the system should embrace principles of andragogy, including ensuring education is designed around their prior experience, self-direction and career goals, while also providing appropriate levels of challenge and development. It should be noted that while the government rejected the recommendation in the University Advisory Group report to make university education more exclusive to ensure the rigour of academic standards, attention still needs to be paid to how the sector addresses the 'wicked' problems of maintaining quality, scaling effectively, and tailoring learning to individual needs while maintaining benchmarks of achievement.

3.4 Qualifications should be trusted as a testimony to competency, providing assurance to learners, employers and the public that graduates have attained the skills and knowledge required for their field. Occupational licensing regimes sit over the top of this, offering additional safeguards and compliance in areas where public safety or high professional standards are essential. Tracking how many people who hold relevant qualifications successfully pass licensing examinations and go on to obtain and maintain their registration is therefore a valuable indicator of the robustness of qualifications and their alignment with occupational requirements. BusinessNZ supports the Ministry for Regulation's current review of occupational licensing and sees this as an area for greater cross-agency coordination and an important feedback loop for understanding whether tertiary education is meeting the objective of long-term professional competence.

3.5 Achievement should be understood as more than the successful completion of a qualification. International frameworks, such as the OECD's Key Competencies and the European Qualifications Framework, emphasise that learner achievement integrates three elements: acquisition of technical knowledge, skills to apply knowledge in practical contexts, and broader enterprise competencies such as communication, teamwork and adaptability that underpin employability. BusinessNZ considers that the TES should reflect this integrated view, ensuring that achievement measures capture not only whether a qualification is attained but whether graduates are genuinely equipped to succeed in the workplace and contribute to innovation and productivity.

3.6 BusinessNZ supports the TES proposal to develop new measures such as "distance travelled." However, strengthening these measures will also require robust feedback loops directly from industry to government agencies, ensuring data on graduate outcomes

reflects real labour market performance and employer needs. We encourage government agencies to prioritise measures that capture quality teaching, relevance of skills, and the long-term value of learning to individuals and employers.

Priority 2 – Economic Innovation and Impact

3.7 BusinessNZ strongly supports the draft TES emphasis on increasing the economic impact of tertiary education by delivering relevant, adaptable skills and research that drives productivity and innovation.

3.8 BusinessNZ notes that employers consistently report skills mismatches, with graduates often lacking the applied skills, work readiness and adaptability required in modern workplaces. Addressing this requires not only embedding labour market relevance into programme design but also building stronger industry–tertiary partnerships.

3.9 While the TES rightly identifies research commercialisation and stronger industry collaboration as priorities, New Zealand's performance in this area remains weak, with low investment compared to international peers. The new Strategy should set clear expectations that tertiary research funding better rewards partnerships delivering measurable economic and social value, including applied research, user-initiated projects, and pathways for knowledge transfer into industry. At the same time, fundamental research and long-term knowledge creation remain essential.

3.10 BusinessNZ particularly welcomes the commitment to expand work-based learning and integrate employers more directly into programme design and delivery. To ensure this shift is effective, the Strategy must be backed by robust feedback loops from industry into government agencies and the Tertiary Education Commission, so that investment decisions and programme approvals reflect current and emerging skill demands. The establishment of Industry Skills Boards provides a vehicle for this, but it is imperative that direct feedback loops and a constructive working relationship between industry and government agencies is established to provide insights on the change programme as it is implemented, and that a broad range of data is utilised to inform performance and reduce duplication between agencies and ISBs.

3.11 A critical issue for delivering on the TES is addressing the way funding levers currently operate. Too often, the framework creates disincentives for system shifts that would benefit learners and employers. For example, while flexibility to complete qualifications in the workplace should be encouraged, moving into employment or transferring to a different provider is frequently recorded as a non-completion, resulting in loss of funding and negative performance markers. This not only penalises providers but also discourages learner mobility and employer-responsive training. System-level monitoring and policy settings must be redesigned to better enable mobility of learning, recognising progression and skills acquisition across contexts rather than treating anything short of completion with a single provider as failure. Achieving this will require unpacking the fundamentals of the current framework, particularly the reliance on funding tied to duration of study rather than genuine learning outcomes.

3.12 While the TES focuses on future skills for economic transformation, it should also recognise that foundational capabilities (literacy, numeracy, digital fluency, and employability skills) are prerequisites for higher productivity and must be systematically embedded across all

levels of provision. It is suggested that new ways of targeting and embedding literacy and numeracy alongside technical or applied skills are explored with the view to accelerating learner progression and achievement through the system and provide a focus on the efficiency of learning rather than relying on sequential, disparate staircasing. Without this foundation, efforts to develop advanced or specialised skills will be undermined.

3.13 There is scope to consider how to build tertiary education into economic monitoring. BusinessNZ recommends that the TES strengthen its monitoring framework by measuring the productivity impact of tertiary education through a combination of graduate employment outcomes, earnings premiums, skills utilisation, and research commercialisation, alongside labour market productivity measures. International practice, including OECD and European frameworks, shows that capturing both labour market outcomes and the innovation contributions of tertiary education provides the clearest picture of its impact on national productivity.

Priority 3 – Access and participation

3.14 BusinessNZ agrees that access and participation in tertiary education is essential to building a more productive and inclusive economy. The draft TES rightly highlights that too many New Zealanders face barriers to tertiary education.

3.15 These barriers not only constrain individual opportunity but also reduce the available workforce. Continuing the high rates of skills mismatch in the labour market increases the reliance of New Zealand on international skills.

3.16 We strongly support the intention to provide a greater range of high-quality education and training options that are flexible, affordable, and better connected to local labour markets. Tertiary education must be genuinely accessible to all New Zealanders, not treated solely as a transition from school. Work-based training at all levels is an effective way to increase participation, and is used in other countries as a leading indicator on productivity. It is important to note that online learning has vastly improved access to education, however lower than average course completion rates, digital access barriers and its lack of applied and experiential learning should highlight that it cannot be the default preference for improving access.

3.17 BusinessNZ has consistently highlighted in previous submissions on vocational education the need for stronger alignment between the Ministry of Social Development and the tertiary system. With the TES signalling a shift towards more sophisticated achievement measures, there is an opportunity to better connect tertiary education with pathways out of unemployment and underemployment. A longer route back to employment through tertiary education, particularly when it leads to higher-skilled and more sustainable employment, should be considered just as desirable as immediate job placement. This requires active coordination between MSD and tertiary agencies so that education is treated as a legitimate and valuable employment pathway, with less duplication of effort and expenditure within the social development and tertiary portfolios.

3.18 An important driver of participation is clarity of pathways and confidence in outcomes. Prospective learners need accessible, transparent information on the employment value of different qualifications, the portability of credits, and the options for retraining or progression over time. Employers likewise need assurance that the programmes their staff

enrol in will deliver skills that are relevant and responsive to industry demand. Stronger feedback loops between providers, government agencies and employers will be essential to achieve this priority. Finally, it is important that access initiatives are framed not only in terms of equity but also economic necessity. Sustained productivity growth requires full participation from all parts of society. Enabling more people to access education and training is one of the most direct ways to expand the skilled workforce and lift New Zealand's overall prosperity.

Priority 4 – Integration and collaboration.

3.19 BusinessNZ strongly supports the emphasis in the draft TES on deepening collaboration across the tertiary education system and with external partners including employers, iwi, research institutions and communities.

3.20 The current system remains fragmented, which is an anomaly given the small scale of New Zealand. Stronger integration is essential to ensure education provision is aligned with both regional and national development priorities, and to maximise the impact of teaching, training and research.

3.21 From an employer perspective, the critical shift is ensuring that partnerships with providers are structured, consistent, and outcome-focused. Businesses are ready to contribute insights into skill demand, programme design and applied research, but too often these conversations happen in an ad hoc or transactional way with a view of meeting compliance requirements for industry endorsement rather than a genuine response to business demand.

3.22 Integration is also vital to closing the gaps between schools, vocational training and higher education. Clearer secondary-tertiary pathways, particularly for vocational education, will help young people transition smoothly into further training or employment, while work-integrated learning and apprenticeships ensure stronger connection between education and the workplace. BusinessNZ is optimistic about the prospects for the NCEA reforms to encourage greater parity and clarity of vocational pathways. For higher education, more systematic industry engagement in course design, internships, and research projects will better prepare graduates for modern work environments.

3.23 Collaboration across the research system must be strengthened. Universities, polytechnics, wānanga, and Public Research Organisations should share infrastructure and co-develop applied projects that accelerate knowledge transfer and commercialisation. International collaboration should also be deepened, not only to connect New Zealand to global innovation but to ensure our graduates and businesses can succeed in an increasingly interconnected world.

3.24 It will be necessary for all parts of the government system to work constructively with industry to understand the challenges and opportunities for the education system to respond. Government agencies cannot abdicate their responsibility for direct engagement with industry by relying solely on government-funded intermediaries. The authentic voice of industry lies with companies themselves and the industry associations that represent them, backed by their membership. Effective system stewardship therefore requires structured and ongoing dialogue with employers at scale, ensuring that measures reflect

the realities of business demand rather than proxies or second-hand interpretation, as highlighted in BusinessNZ's earlier submissions on vocational education reforms.

Priority 5 - International education

3.25 BusinessNZ strongly supports the government's ambition for international education, noting the need to maintain quality, strengthen system integrity, and ensure international learners have positive experiences that reflect well on New Zealand's reputation.

3.26 International students and researchers can bring valuable knowledge, networks and cultural capital that enrich domestic learning environments and strengthen New Zealand's workforce. The TES should more explicitly connect international education to long-term skills strategies, including opportunities for students to transition into high-demand occupations and contribute to addressing persistent labour shortages.

3.27 Strong quality assurance, transparent and attractive immigration settings, and robust provider accountability are critical to ensuring sustainable growth in international education. It should be noted that there is a broad range of export revenue-generating opportunities in international education that extend beyond traditional models, and education providers need to be ambitious for utilising the scale and revenue of international education opportunities to advance national priorities and opportunities for domestic learners.

3.28 BusinessNZ considers there should be a more coordinated strategy for international education to maximise the opportunities for global connectivity and benefit, noting that the international education plan currently relies on marketing and promotional activity to drive volume. A 'New Zealand Inc' approach that better connects international education to trade, foreign affairs and exporting connections could deliver value and volume.

3.29 BusinessNZ recommends that the TES highlight international education's role in fostering global research collaboration and business partnerships. By linking international student flows more directly to applied research, innovation ecosystems, and employer demand, international education can deliver benefits far beyond tuition revenue.

4.0 Comment: delivery of the strategy

4.1 BusinessNZ recognises that the effectiveness of the TES will depend on strong measures and monitoring, backed by timely and relevant information. At present, enrolment and achievement data collection and reporting are cumbersome, slow and fragmented across agencies. Education accounting measures take primacy over clear and usable information, with EFTS reporting having little utility outside the education sector to inform industry of the source and scale of the skills pipeline. This undermines the ability to track progress, make evidence-based investment decisions, and provide meaningful information to learners and employers. A key step forward will be greater agreement on the measures that matter, and the designation of a lead agency with clear accountability for reporting on the TES.

4.2 While coordination across agencies is already expected, in practice data and monitoring continue to operate in silos, with duplication across departments and gaps in consistency.

4.3 BusinessNZ is also mindful of the wider context in which monitoring will occur. Programmes such as the digitisation of government services, the use of AI, use of the IDI and Treasury's macro-economic measures all present both opportunities and risks. These initiatives must be integrated carefully into the TES monitoring framework, with safeguards to ensure transparency, consistency and public trust. Of equal importance is greater transparency over provider performance. Learners and employers both require accessible information on outcomes and quality to guide choices and hold institutions accountable.

4.4 Current EFTS and enrolment data provide little value to employers seeking to identify where potentially skilled staff may be emerging from tertiary providers. These figures are too abstract to assist businesses in recruitment or workforce planning. What is needed are stronger connections between education and employment that move beyond individual provider–employer relationships (important though they are) to a scaled system where employers can clearly see where pools of skilled labour are developing, including for niche qualifications or provision outside their home region. BusinessNZ therefore suggests commissioning a dedicated piece of work to create labour market data comparable to GDPLive.net, but focused on skills supply. Such a tool could integrate multiple indicators, provide near real-time insights, and be tracked alongside formal labour market data to give employers actionable intelligence on where to target recruitment and training investments.

4.5 We note that the draft TES acknowledges the distinctive contributions of different types of providers — universities, wānanga, polytechnics and PTEs. This should be reflected in monitoring and reporting. The investment plan process could be used more effectively to recognise these distinctive missions, while also ensuring that measures allow for both national and international comparability and are tailored to the needs of diverse communities.

4.6 Finally, funding is the most powerful lever government has to drive system change. To achieve the strategic shift envisaged in the TES, measures must be directly linked to funding. This means rewarding providers that deliver relevant skills, strong employment outcomes, and research impact, while ensuring accountability for underperformance. Without clear links between monitoring, measures, and investment decisions, the TES risks becoming aspirational rather than transformative.

BusinessNZ
THE VOICE OF BUSINESS

The BusinessNZ Network is New Zealand's largest business organisation, representing:

- Business groups EMA, Business Central, Business Canterbury, and Business South
- BusinessNZ policy and advocacy services
- Major Companies Group of New Zealand's largest businesses
- Gold Group of medium-sized businesses
- Affiliated Industries Group of national industry associations
- ExportNZ representing New Zealand exporting enterprises
- ManufacturingNZ representing New Zealand manufacturing enterprises
- Sustainable Business Council of enterprises leading sustainable business practice
- BusinessNZ Energy Council of enterprises leading sustainable energy production and use
- Buy NZ Made - country of origin licensing organisation for NZ-made products, NZ-grown ingredients, and NZ-coded software services

The BusinessNZ Network is able to tap into the views of over 76,000 employers and businesses, ranging from the smallest to the largest and reflecting the make-up of the New Zealand economy.

The BusinessNZ Network contributes to Government, tripartite working parties and international bodies including the International Labour Organisation (ILO), the International Organisation of Employers (IOE) and Business at OECD (BIAC).

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Civil Contractors New Zealand submission on the draft Tertiary Education Strategy

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Date: 30 September 2025

1. About Civil Contractors New Zealand

Founded in 1944, Civil Contractors New Zealand is an industry association representing the interests and aspirations of more than 800 member organisations, including more than 500 large, medium-sized, and small businesses in civil engineering, construction, and general contracting. Over 300 associate members provide valuable products, support, and services to contractor members. We live and work in all communities across New Zealand.

Our members play a vital role in the development of our country, our economy and our way of life. They are responsible for the construction and maintenance of the roads connecting our cities and towns; they install and care for the water networks that bring fresh water to houses and wastewater to treatment plants; they install the cables that bring the internet to homes and businesses. These are services a modern and developed economy must have to compete efficiently in world markets and to deliver high living standards for all New Zealanders.

The broad civil construction industry employs more than 60,000 people and undertakes projects worth around $10b to $12b annually. More specifically, our organisation represents the contractors who carry out the physical construction works on New Zealand's roading, rail, port, public transport and utilities networks.

The civil construction sector is responsible for infrastructure construction and maintenance, which is vital to keep New Zealand moving and quality of life high. Our productivity and workforce entry points depend on an effective education sector which links primary, secondary and tertiary education.

CCNZ welcomes the opportunity to comment on the proposed Tertiary Education Strategy.

2. Executive summary

In summary:

- Overall, we support the strategic direction.
- We support work-based learning models as this is where the majority of formal qualifications are achieved in the civil construction industry.
- We support the concept of improving educational performance outcomes by such measures as “distance travelled, or value added”.
- We suggest that increased funding and access to pastoral care could improve achievement rates significantly.
- Broadly we support the priorities of achievement, economic impact and innovation, access and participation, integration and collaboration and international education.
- We agree that graduates of tertiary programmes do need to have job-ready skills.
- We support the system having stronger feedback loops with employers and industry.
- We support strengthening industry leadership through the new structures of the Industry Skills Boards.

3. Background

Our industry research tells us that we have too few people coming into the industry as new graduates from school. A massive 66 per cent of workers entering the civil construction industry are career changers, as illustrated in the Construction and Infrastructure Centre of Vocational Excellence report ‘*Where’s the front door? – An investigation of the workforce entry points into the construction and infrastructure sectors’* (2023, p3).

The implication is that the education system is not meeting the needs of the civil construction industry, or the needs of learners entering roles in this sector. Yet, tertiary education has an important part to play in the education ecosystem preparing people for the world of work.

Early exposure to career ideas, early skills development, foundational literacy and numeracy can be developed and clear career pathways to careers that lead through the education system into the world of work can be developed. Industry has a large part to play to lead this work. We know what skills we need to get the job done and industry needs to be at the forefront of strategy development for education to ensure a pipeline of talent can be met for future workforce needs.

Civil construction offers meaningful employment opportunities and as we seek to grow our country with an emphasis on infrastructure development, access to education opportunities for the people to carry out this work becomes increasingly important.

4. A flawed process

We have significant concerns about the reforms taking place in the vocational sector currently. The reform process is well advanced with a new structure in place by 1 January 2026, and yet this has all taken place without any clear and visible strategy (until now). Any business expert knows that structure should follow strategy, and yet the strategy is only

being consulted on now. This is poor policy making that leads to poor legislation – employers and learners deserve far better than this.

The scale of reform is massive and with these many moving parts we have grave concerns about the speed and direction with which these reforms are taking place. With Industry late to the table, and needs often not heard, we have concerns that this reform will fail.

5. Strategic Direction

Overall, we support the strategic direction. CCNZ believes that a skilled and adaptable workforce is essential for growth. The workplace is the primary place of learning for civil construction, and the role of workplace supervisors, trainers and mentors is a critical part of the system. We need to ensure we preserve this, grow it and it make it more visible to ensure that workplace learning remains fit for purpose and continues to contribute to the sector.

6. Why change is needed

We do not need change for change's sake. It is important to consider the parts of the system that work well and retain these factors. There is a focus on completion rates and enrolment rates for those in work-based delivery. These statements on their own are meaningless without context.

Consider civil construction for example. With little visible pipeline of work and businesses laying off staff, enrolment into tertiary study is understandably not a priority; business survival is. Trainees that are enrolled in work-based learning will have a focus on doing the job well and completion may not necessarily be a focus.

Additionally, we need to consider the way in which in-work training is pitched to trainees where multiple workbooks, poor instructional design and competing priorities may all impact on completion rates. We support the intent to see providers needing to evolve their practices to meet changing learner needs and suggest this needs to be widened to ensure meeting the needs of industry for functional assessment. Innovation in learning design and assessment practice will be needed for this be a success.

7. Priorities

Broadly we support the priorities of achievement, economic impact and innovation, access and participation, integration and collaboration and international education.

With regard to drivers for change, a key driver in the civil construction sector is work security. That is, a clear pipeline of work so that contractors can plan for all learning that needs to take place across the range of roles that support civil construction.

We suggest many of the qualifications are not mandatory in this sector, as in others, and this would lift performance and productivity. It will also support an attractive apprenticeship pathway that can lead into higher tertiary learning. Succession planning can be utilised as a

driver for training. We also support increased visibility over career pathways and opportunities to enter and move around in the sector.

7.1 Priority 1: Achievement

Support.

We support the concept of improving educational performance outcomes by such measures as “distance travelled, or value added”. We suggest that increased funding and access to pastoral care could improve achievement rates significantly.

For example, access to learning styles, increasing assess to literacy and numeracy support, multiple learning and assessment methodologies being accepted could also assist. The government has slashed funding for training at a time when we need to be building our capacity and capability to meet the expected significant uptick in work. This makes no sense and is a critical risk to delivering the government’s own infrastructure agenda.

7.2 Priority 2: Economic Impact and Innovation

Partially support.

We agree that graduates of tertiary programmes do need to have job-ready skills. There are many practical examples of this where degree level learning incorporates practical assessment with short term employment/work experience as part of the overall qualification. Initiatives like this lead to better tertiary graduates with higher employability skills.

We support the system having stronger feedback loops with employers and industry. There are good examples of this now. A major hand brake is grappling with the bureaucracy of funding decisions through the TEC, and approval processes through agencies such as NZQA and others. This all needs to be streamlined to ensure there is a system that listens more and acts on the change requested.

We support work-based learning models as this is where the majority of formal qualifications are achieved in the civil construction industry. We also expect to see work-based learning expand as well as the opportunity for degree level apprenticeships. However, we cannot support the concept of a proliferation of regional programmes delivered through regional polytechs. That will lead to nationally consistent and industry agreed programmes being dropped in preference to a regional focus supporting “new providers”.

The statement that apprenticeships and traineeships should develop to ensure that people are prepared for today, as well as tomorrow really is a statement about flexibility in learning programmes and critical thinking. We need to see this not just at tertiary level, but also secondary education and concepts delivered in primary education.

We support strengthening industry leadership through the new structures of the Industry Skills Boards. In this regard, for ISB’s to be successful and meet the needs of their sectors they need to be adequately resourced. The current proposals require the ISBs to do everything that the WDCs did (and more i.e., with respect to NCEA changes), but with

insufficient funding and too few people. This is an unfolding disaster and risks the success of the reforms and the way in which the sector regards education.

7.3 Priority 3: Access and Participation

Overall support.

The statement about underperformance of specific groups in the tertiary sector isn't confined to just this sector and cannot be fixed in just this sector. A whole of education approach needs to be taken to widely lift performance. Barriers to participation in education and training are not just about access, they are also about uptake. A system that can address that need should be considered alongside access. New Zealand has an issue with ambition and this needs to be addressed in earlier levels of learning before suggesting that access to tertiary education is where the problem needs to be fixed.

We have a low wage economy and people who may wish to complete tertiary study are highly likely to have competing demands at home, not be able to access the financial supports through family or via loans and this impacts both access and uptake. Education can be very expensive so breaking down barriers that make the system easier to manoeuvre to, and through, would be helpful.

It is our view that foundational learning, i.e. level 2 learning, should be delivered in schools alongside foundational literacy and numeracy.

We support the concept of clearer career pathways for vocational education. Civil Contractors New Zealand developed an industry first tool to show the range of roles, both in work, and higher-level learning opportunities to help students, schools, families and communities understand the role opportunities and tertiary education pathways available. This work can be seen here at the Infrastructure Career Roadmap.

We also consider that there will be increased participation through appropriate Recognition of Prior Learning (RPL) or Recognition of Current Competence (RCC) practices and suggest that this would impact not just on access and participation, but also duration, completions and it would add immense value to industry.

We recommend that standardisation will be required for some sectors, infrastructure being one of these, to ensure nationally consistent delivery of in work training programmes.

7.4 Priority 4: Integration and Collaboration

Partial support.

The previous reform of education established the CoVE's. These were research entities, and the work carried out by these publicly funded agencies was a game changer for infrastructure. In the current tranche of reform they are being dis-established.

This priority suggests that industry and education will need to have stronger ties and greater engagement, and research will play a big part of this. We had this with the CoVE's. It worked

incredibly well. Rather than redesign though other Public Research Organisations, we should reinstate what we had.

7.5 Priority 5: International Education

Partial support.

Where education can lead to an effective employment outcome, and there is no New Zealander to do the job, we could support this. This is why we support specific roles for immigration into New Zealand.

8. Delivering the strategy

The statement that universities "act as the critic and conscience of society, meet international standards, and serve as repositories of knowledge" is not well grounded. A significant number of other agencies and individuals do this as well. Statements such as this continue to perpetuate the concept that tertiary study at universities is somehow "better" than other tertiary study.

Regarding providers being expected to respond to workforce needs and improving outcomes for under-served students and trainees and contributing to national and regional development, we largely support this statement. However, New Zealand will never achieve the gains in education if we do not equally focus on the higher performers and shifting the middle of the curve toward success. The ongoing focus on low achievers becomes self-perpetuating if this is the primary focus. We recommend that the strategy is wider as noted above.

9. Government Agency Roles

We note the government agencies and the role each has to play in the tertiary education system. Our current experience is that these agencies, particularly TEC, are a hand brake to progress, are stifling innovation, and are forcing ideological changes on sectors without a clear understanding of how those sectors work, what they need to progress and grow, and what contribution they make to New Zealand's growth and productivity.

We are being asked as industry to work within and contribute to a structure, but our contribution is often going unheard, and our requests remain un-met as they do not fit into the views held by the agency. There is too much control in these agencies and too little voice given to industry in terms of decision making and recommendations on a future state for education.

With the vocational education reforms, the Minister promised that "industry leadership" would be the cornerstone of the reforms. The truth is the exact opposite, with the agencies dictating what industry can and can't do, and the draft vocational education legislation expressly preventing any prospect of industry leadership.

This is unacceptable and risks employers walking away from a nationally recognised framework. This would be disastrous for industry, learners and New Zealand generally, and

we are perplexed that the Select Committee and government are prepared to put our world class system at such significant risk.

With the wholesale reform of the sector taking place, we have concerns that the focus on the bigger picture will lose the detail of the system changes that need to be made for the education sector to become high performing.

It is past time that the agencies, particularly TEC and NZQA, are subject to substantial and meaningful review to determine if they remain fit for purpose – our sense is that they do not.

10. Monitoring Tertiary Education Strategy Outcomes and System Performance

We support the broad structure in place for monitoring the strategy. We would be keen to see the strategy given time to bed in and not significantly modified during election cycles. The system has had enough change, and for industry to remain engaged at all levels the constant scale and level of changes needs to stop. System stability is required.

In regard to achievement, in a work-based learning model which is predominantly how the civil construction sector accesses tertiary study, completions are a function often of the nature of the work, access to additional work and the type of contract. Distance travelled concepts may help but this needs to align with in work activity and visibility of future works.

We reiterate our concerns regarding "access" to education by providers and argue that the concept of uptake and ambition are considered in the mix.

For international education, while there is substantial increase in student enrolments to double the value of education, we would be more interested to see at what level of study these students were learning and how their learning also contributed to 'NZ Inc', and our overall productivity.

And we reiterate again – these kinds of changes must be industry-led and government enabled – without that the fundamentally flawed process that we are experiencing with the vocational education reforms will continue to be repeated.

Thank you for the opportunity to submit on this draft proposal. We look forward to working with you. We would be happy to present in person if that opportunity arises.

Yours faithfully

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Tertiary Education Strategy Response

Competenz – September 2025

Competenz
Your industry training partner

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	Competenz – A division of Te Pūkenga
Organisation category (please indicate):	Polytechnic (including divisions of Te Pūkenga)
Role/position	9(2)(a)
Request to withhold part or all of submission	
Email address ***For contact in response to Official Information Act request only.***	9(2)(a) @competenz.org.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

Competenz welcomes the opportunity to consult on the Tertiary Education Strategy.

Broadly we feel that the intent of the strategy is sound and are in agreement with many of the initiatives as outlined. An area that the Strategy falls short is the effective bridge between TES and the compulsory education sector. Alignment with the NCEA reform and the National Education Learning Priorities are important to transition learners between secondary school and tertiary settings.

We also believe that the first year of tertiary should enable students to build foundational technical and transferrable work-based skills and enable options for multiple future specialisation paths.

A system that enables dual pathways so that students can seamlessly operate between work-based learning and classroom settings, to ensure that they have the full theoretical grounding plus are able to get hands-on experience in workplaces and gain work ready skills is also applauded. Flexibility to undertake bite-sized packets of learning and stack these to a full credential would enable this mobility between tertiary campus-based learning and the workplace. We also applaud the enabling and mobility across the Universities and Polytechnics so that credits and units can be carried across multiple institutions. We believe there is an opportunity for far better mobilisation between the workplace and academic world. University and tertiary institutions are places of privilege and are becoming increasingly unattainable. Mixed models should enable young people to earn and learn at the same time.

We agree that Providers need to closely connect with employers, and we need to make it as easy as possible for employers to participate.

New Zealand needs a system where learners can gain transferrable and portable skills. Our education system must prioritise sectors where NZ looks to gain a strategic advantage either in high value manufacturing or production, service delivery, or where there is a justifiable and measurable skills shortage. Having said this, more needs to be done in retaining and tying skills to NZ. It is disheartening to see the expense in employing and training our young people, only to see this talent exported to Australia and further afield.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

We are in agreement with the drivers of change in tertiary education.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral
Do you have suggestions for additional activities to support this priority?	

We support the statement

> "Improving achievement rates is therefore both an economic and social imperative. It also requires a more nuanced understanding of success. Completion metrics alone can mask progress made by students and trainees from disadvantaged backgrounds. Measuring how far a learner progresses from their starting point can provide a fairer and more informative view of provider performance."

Achievement is a critical priority but requires the broader eco-system to calibrate for success. It means a compulsory education sector that sets young people up to succeed, with the levels of literacy and numeracy required to perform their jobs. Ensuring that students coming out of school have the right attitudes for success, that they remain in school and have good attendance rates, and that they have developed soft skills such as working with teams, goal setting and delivery, communication skills and critical thinking will assist in creating skills and attitudes for life. The strategy needs to directly link to the reform in NCEA to ensure that our young people are set up to work, study and achieve once they have left the compulsory education system.

With this in mind, we also support the statement

> "Providers' performance in improving educational achievement should be assessed with a greater focus on "distance travelled" or "value added". Students' and trainees' prior educational achievement, socioeconomic circumstances and other characteristics are major factors influencing people's education prospects and the level of personal effort and provider support needed to achieve educational success."

Seeing stronger alignment between tertiary education achievement and employment outcomes at all levels of study is a good start. Ensuring that courses and qualifications lead to real career opportunities by embedding labour market relevance into programme design and delivery are good first steps, but the

settings need to be in place to foster this collaboration. This requires the right incentives for employers, trainers and learners to enrol, support and achieve. It also requires appropriate resourcing in interventions and additional learner support. Achievement requires narrowing the gap between employer expectation and learner preparedness.

We advocate for Providers who have high quality of delivery, consistency and a track record for meeting the needs of the sector. We are concerned about comments on expanding the pool of PTEs in the work-based learning and new apprenticeship space. Our concern is that though a competitive Provider sector would appear to be good for the employers in the first instance, we are servicing a country of only 5 million people. Sustainably operating, high quality, targeted provision should be prioritised over PTE proliferation.

Trainee mobility between provider and work-based learning will need a sustainable and equitable approach to funding, based on the relative strengths of work-based learning and campus-based learning. Ensuring adequate pastoral care is provided to learners (irrespective of setting) and support for employers requires adequate resourcing and should not be left to chance. To address the mobility between employers and providers will require a review of the funding mechanisms, programme design and employment legislation.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree

We support the comment "the Government expects a stronger emphasis on the economic relevance and impact of tertiary education, with greater employer, industry, and iwi input into programme design and delivery – particularly for vocational and career-focused learning. Provision must be more responsive to emerging skills needs, especially in high-growth industries, new technologies, and the expanding Māori economy."

With the comment "we expect to see work-based learning expand, with new providers being encouraged to enter the system. The apprenticeships and traineeships they develop should not only ensure workers develop the capabilities businesses need today, but that they are prepared for changing industry environments" we acknowledge the need for providers to respond to the changing needs of industry, but proliferation should not come at the expense of quality and sustainability. Our sectors will be better served with a smaller number knowledgeable, reputable, responsive providers focussed on high quality learner support and learner achievement, and operating sustainably. Not a proliferation of providers with questionable and unsustainable pricing practices.

We are supportive of the comment to "Strengthen sector leadership on artificial intelligence and its impact on tertiary education" and believe that New Zealand needs to fast track its adoption of AI as an education and productivity tool.

We are supportive of the "focus on vocational education and training investment on where it can genuinely address skills supply issues, including through analysis, planning, and advice functions of Industry Skills Boards."

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral

We support the comment that "the time and cost for employers and workers to participate in tertiary education and vocational training should be minimised through programmes that are the right size, delivered flexibly, and that enable people to earn and learn while in formal education and training. This includes ensuring foundation education programmes meet the needs of young people with limited work experience and educational achievement.

It is important that funding reflects the objectives and importance of foundational education programmes that are the bedrock to a learner's success. Broad foundational L2 programmes that build fundamental technical and soft employment-ready skills, and open multiple pathways for further education need to be properly valued, recognised and funded.

Literacy and numeracy should be properly assessed, and additional funding should be provided for learners that have not achieved the requisite levels through their time in the secondary school setting. We have seen an alarming increase in poor literacy and numeracy for young people enrolling in work-based learning. Until we can account for the widening gap, we will not be able to address the broader accessibility issue.

However, we believe that there is a considerable job for compulsory education sector to set young people up for success and work-readiness. We support the ambition to "Strengthen secondary-tertiary pathways, particularly for vocational education and training, and for young people at risk of being not in education or employment."

Addressing access and participation starts with the right support at high school, and the right guidance. Accessible trade pathways and closer links to industry from high school must be fostered. Enabling trainers and trades expertise to more readily teach and share expertise in a school setting is also important given the aging population of technology teachers. This is currently discouraged because of the qualification requirements for teachers, that are not practically relevant for trades-trained experts. The settings to bring vocational pathways alive currently in schools are not conducive to pathway our young people into work-based learning. The referencing between the NCEA reform, National Education Learning Priorities and the TES need to be more explicit.

We support the ambition to "make it easier for students and trainees to move between tertiary providers and between work-based and provider-based learning". However, we caution that polytechnics need to focus on excellence in on-campus delivery with commensurate funding, to enable work-based providers to deliver effectively and sustainably. In the past we have seen an uneven playing field, where ITPs use higher funding models to inappropriately cross-subsidise their managed apprenticeships. This had made it difficult for work-based learning to compete sustainably. Mobility between provider-based training and work-based training settings need to ensure that there are no unintended consequences based on funding and coverage rules.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree

We support the comment "The Government expects to see much stronger collaboration across the tertiary education system, relevant to the role and context of different types of providers. For foundation education providers, this means closer integration with other education services, employers, and social supports to ensure students access and progress through the system." We support the "Strengthening of secondary-tertiary pathways, particularly for vocational education and training, and for young people at risk of being not in education or employment."

We are also heartened by the "Stronger alignment between schools and tertiary providers – especially for vocational and foundation education – will be required to support smoother transitions, clearer pathways, and better preparation for work or further study"

We acknowledge the comment "The new Industry Skills Boards being established in 2026 will be a key part of this. They will ensure industries have a voice in the qualifications and programmes that vocational providers deliver and advise on where investment in the system should be directed". However, we counsel that the system needs to ensure that ISBs must also be tasked to deliver qualifications that can effectively delivered by providers realistically. The system needs to ensure all participants can work together to develop and deliver responsive, relevant and meaningful qualifications for industry. Funding also needs to align with industry's needs and should incentivise, learner success, collaboration across the sector, efficiency and innovation.

As work-based learning divisions our greatest criticism is that WDC structures were bloated, inefficient and took an overly complex approach to qualification development that resulted in a proliferation of complicated and non-sensical qualifications that could not be delivered sustainably by the Provider sector. An example was an over reliance on designing stackable micro-credentials (based on industry feedback) that attracted minimal funding, which meant that employers were not motivated to enrol learners, and providers were disincentivised to deliver the qualifications. In this case, both qualification design and the mechanisms for funding needed to align to enable the best outcome for the sector and potential learners.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	

Though this section is not relevant for work-based learning, it is our view that strong International Education sector must not come at the expense of New Zealanders. In Universities and Sectors where there is limited capacity for programme delivery, this capacity should be prioritised for domestic learners. Limited capacity programmes for international students should only be made available as stand alone, fully commercial offerings that are not subsidised by the public purse.

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	As "ISBs, which are temporarily managing work-based training provision during the transition from Te Pūkenga to a network of regional polytechnics supported by a federation structure, are expected to contribute to this TES in the same manner as other organisations managing work-based training": 1. We would like to clarify that work-based training provision is transitioning to PTEs and not regional polytechnics 2. It is imperative that work-based training organisations have an equal voice in the future development and execution of the TES. PTE roles will differ from that of the ISB, and we will continue to advocate actively for our delivery, employers and learners.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

A seamless approach to learner reporting from their time in the secondary setting to tertiary should be established to track success of the education system support as a whole. There are risks and gaps as students move from the secondary school to tertiary, and closer monitoring should enable tertiary providers to provide the bespoke support that a learner may need.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

Our hope is that New Zealand takes a bipartisan approach in supporting the TES and strategic direction. NZ Inc cannot afford to keep flip flopping and upending the tertiary education system. The costs in restructuring and money spent on consultants, should be used to address student achievement and equitable access

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CONCOVE TŪHURA

The Next Generation Of Construction & Infrastructure Vocational Education

Draft submission on the Tertiary Education Strategy (TES) consultation

We appreciate the opportunity to provide feedback on the draft Tertiary Education Strategy (TES) and support its intent to deliver a more responsive, integrated, and equitable tertiary education system. The priorities outlined in the draft are broadly aligned with the needs we see across the Construction and Infrastructure sector and the wider vocational education ecosystem. However, the pace of change in industry and technology means that innovation in education cannot be optional — it must be actively funded and accelerated. Strategic investment in educational innovation (including new delivery models, qualification design, and digital tools) would allow many of the intended outcomes of the TES to be realised faster, at greater scale, and with stronger impact for learners, employers, and communities.

Summary

The draft TES establishes sensible priorities and acknowledges many of the system's long-standing challenges. However, without substantive reform of funding mechanisms, regulatory processes, and provider capability requirements, the strategy risks remaining aspirational.

This submission recommends that the TES:

- Be explicitly long-term (10–15 years) and underpinned by bipartisan commitment to provide sector stability.
- Introduce a sixth priority – System Responsiveness and Agility – to focus on regulatory, funding, and approval processes that enable rapid adaptation.
- Link all priorities directly to the levers that can drive change: funding, NZQA approval processes, TEC investment settings, and provider capability development.
- Embed clear implementation and monitoring frameworks, with accountability for agencies and providers to deliver measurable outcomes beyond participation and completion rates.

Strategic direction and objectives

The overarching objective appropriately emphasises economic outcomes but must clarify the timeframe for "long-term strategic direction." After years of structural churn, sector confidence requires a strategy that survives political cycles. We recommend a formal cross-party process to secure bipartisan endorsement.

The strategy should also strengthen its focus on:

- System responsiveness – streamlined qualification and programme approval, flexible funding, and faster innovation cycles.
- Degree apprenticeships and lifelong learning models as part of future tertiary architecture.

The link drawn between low productivity and "gaps in entrepreneurial skills" risks overstating individual capability factors while underplaying structural drivers such as capital investment, regulatory settings, and industry incentives.

Priority 1: Achievement

Achievement must be defined more broadly than qualification completion. A robust framework should distinguish:

- Completion rates
- Skills acquisition and application
- Employment readiness and outcomes
- "Distance travelled" measures

While achievement is a critical system outcome, we caution against relying on narrow measures such as credit accumulation or qualification completion rates as proxies for success. As Waihanga Ara Rau's *Compliance Training Project Report* highlights, the current compliance training environment often results in learners achieving credits without acquiring the expected workplace competence — "post course many learners would not be able to work safely back on the job, without supervision"[1]

We support the inclusion of "distance travelled," but the TES must specify how NZQA and TEC will develop, validate, and fund these measures. We suggest NZQA and TEC develop and share organization Impact Measures demonstrating their tactical response to the strategic direction outlined in the TES and the achievement section in particular.

Retention should not be pursued at any cost — in some cases, early withdrawal into suitable employment represents a successful outcome. Jobs and Skills Australia have recently found that having a VET qualification benefits Australia through an uplift of income, further higher qualifications, increased employability, and reduction in income support. Their work also demonstrated that people who don't complete a whole VET qualification still benefit more than people who have not engaged in any VET at all[2].

Seamless transitions between provider-based and work-based learning remain aspirational. Te Pūkenga's experience demonstrates this will not be achieved without:

[1] https://www.waihangaararau.nz/short-course-training-project/
[2] https://www.jobsandskills.gov.au/news/positive-outcomes-vet-graduates-our-latest-vnda-data

- Changes to RPL funding and recognition
- Changes to allow funding following a learner, rather than a programme or provider
    - Programme design flexibility
    - Alignment with NZQA's new Integrated Quality Assurance Framework (IQAF)

Priority 2: Economic impact and innovation

The focus on innovation and labour market relevance is welcome, but current funding and regulatory settings make responsiveness extremely difficult. We recommend:

- Funding reform – SAC rates and rules should support work-based learning and "right-sized" programmes (not just 120+ credit models).
- NZQA process reform – qualification development and programme approval timelines must be shortened to match industry needs.
- Teaching capability requirements – the TES should commit to a pathway for mandatory teaching qualifications or professional development in the VET sector. ConCOVE's work on standardising and legitimising the training advisor role has been well received by the sector and will require broader consideration for ongoing support.
- Research commercialisation – expectations should be matched with dedicated funding, capability-building, and incentives for collaboration with industry and iwi.

We caution that the requirement for providers within the system to deliver outputs for business needs for both today and tomorrow must be adequately funded. The TES and its resulting funding implementation via the TEC must allow for appropriate and timely delivery to these needs.

Priority 3: Access and participation

We support stronger regional provision and note that this must also be aligned with work-based learning delivery. Collaboration across the sector is required to lift performance and the operational measures for all providers must support the need for collaboration. We also recommend that apprenticeships and work-based learning at all levels (5–7, not just Level 4) be explicitly recognised as a mechanism to improve access.

Micro-credentials should be positioned as tools within a lifelong learning strategy, not as a strategy themselves. Additionally, the full potential for micro-credentials has been stymied by barriers to implementation, ConCOVE's report on The Place of Micro-Credentials highlights further steps to be considered[3].

Funding settings that favour large programmes must be reviewed to allow flexible, modular, and cumulative study options.

[3] https://concove.ac.nz/discovery-hub/micro-credentials-report/

Clear accountability is needed for the development and delivery of high-quality careers information on pathways and employment outcomes.

Priority 4: Integration and collaboration

Collaboration must be deliberate, structured, and outcome focussed. Measurement for collaborative activity must be in place for results to be seen. Industry provides critical demand signals but cannot solve education design issues alone.

The TES should clarify:

- Who evaluates evidence of "evidence-based approaches" and how this aligns with IQAF.
- What structural changes (funding, standards, RPL rules) will enable seamless transitions between modes of learning — an area where Te Pūkenga's experience showed system gaps.
- That industry's input must extend to qualification development, not just programmes. Industry Skills Boards (ISBs) must be funded to deliver to this.

International collaboration should not be limited to universities; polytechnics, wānanga, and PTEs also play critical roles in workforce development and global knowledge exchange.

Priority 5: International education

We support positioning international education as more than an export industry — it should be seen as a two-way contributor to domestic provision, research, and innovation.

This priority should explicitly include vocational providers, not just universities, leveraging New Zealand's expertise in applied and work-based education. This is especially important in light of the removal of funding of neutral, sector-based, research bodies.

System implementation and operationalisation

The largest risk to TES success is lack of operational clarity. We recommend:

- Implementation taskforce – a cross-agency group empowered to recommend regulatory and funding changes needed to operationalise the TES.
- Regulatory review – comprehensive review and updating of NZQA's qualification development, programme approval, and provider accreditation processes to eliminate barriers to responsiveness and innovation.
- Funding model reform – align SAC and other funding rates with strategy objectives, particularly for work-based, modular, and flexible delivery
- Capability development – address fundamental capability gaps, including mandatory teaching qualifications in the VET sector and provider capacity for industry engagement.
- Monitoring and accountability – TEC's investment approach must integrate new indicators (distance travelled, employment transitions, responsiveness to labour market needs) and apply consequences for poor performance.

Conclusion

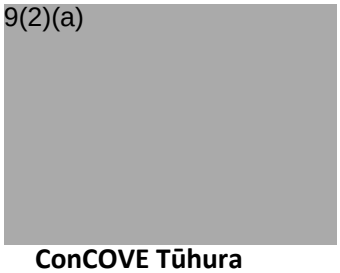
The draft TES provides a credible framework but will fail to deliver transformation without structural reform. To succeed, the final strategy must:

- Be long-term, bipartisan, and stable.
- Explicitly embed degree apprenticeships, lifelong learning, and work-based learning at multiple levels.
- Align funding, regulatory, and quality assurance settings with TES priorities.
- Include a sixth priority on System Responsiveness and Agility.
- Establish clear accountability and monitoring mechanisms that track progress, not just participation.

With these adjustments, the TES can move beyond aspiration and drive genuine, measurable system change.

Ngā mihi nui

9(2)(a)



ConCOVE Tūhura

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template - DairyNZ

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

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Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

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Submitter details

Full name	9(2)(a)
Organisation name	DairyNZ, in consultation with Dairy Training Limited
Organisation category (please indicate):	• Industry • Private Training Establishment
Role/position	9(2)(a)
Request to withhold part or all of submission	Not applicable
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @dairynz.co.nz

Objective and Drivers for Change questions

1. Do you have any comments on the draft objective for tertiary education?

DairyNZ welcomes the opportunity to provide feedback on the draft Tertiary Education Strategy. As the industry-good organisation representing New Zealand's dairy farmers, we are deeply invested in ensuring the tertiary education system supports the development of a skilled, adaptable, and resilient workforce that can meet the evolving needs of the dairy sector and rural communities.

We support the Strategy's draft objective statement and the emphasis on productivity, innovation, and economic growth. That said, we think it is hard to disagree with this objective. Similarly, we think it is hard to disagree with any of the five priorities identified in the Strategy when these are considered in isolation.

Where we feel more could be done to strengthen the Strategy is in outlining how the tertiary system should respond when these priorities come into conflict with one another. In particular, it would be valuable to understand more clearly how the objective and the priorities in the Strategy will flow down to funding choices, given that these choices are the strongest lever that TEC has to implement the Strategy.

For example, DairyNZ's PTE subsidiary Dairy Training Limited is funded by TEC to deliver micro-credentials at level 5 aimed at farm owners and managers. This delivery contributes directly to Priority 1 and Priority 2. But Dairy Training has *not* been able to secure funding to deliver its NextGen programme – aimed at new entrants to the workforce – despite the potential to contribute to Priorities 1, 2 *and* 3. We would like to be able to reconcile these funding choices to the wording of the Strategy.

We return to this theme at various points below.

2. Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

DairyNZ supports the Strategy's recognition of the need to address productivity challenges, skills mismatches, and regional disparities through the Tertiary Education Strategy. As a key contributor to New Zealand's economy, the dairy sector relies heavily on a skilled and adaptable workforce, particularly in rural areas where access to education and training is limited.

We agree that the drivers of change noted on page 6 (see list below) are important:

- Technological change,
- Evolving student expectations and career patterns,
- Fiscal constraints,
- Global trends and pressures, and
- Demographic change.

However, we think that the Strategy should separate the point on fiscal constraints from the other items in this list. The other four points highlight trends that are mostly the responsibility of **providers** to respond to when designing their delivery.

Regarding fiscal constraints however, the Strategy rightly states that

> *[…] in a tight fiscal environment, the **Government and providers** must make difficult trade-offs and carefully prioritise expenditure to maximise the value of public investment.*

We think the **Government** needs to give providers and industry more guidance on **how much** it values the different outcomes and priorities set out in the Strategy in order that providers and industry are better informed to make the *difficult trade-offs* required.

We acknowledge the stated intent to give industry a stronger voice in the process to make choices by advising TEC through the ISBs. However, we are concerned that ISBs will have neither the tools, the connections, nor the funding to play this part effectively. Consequently, we urge TEC to maintain direct lines of communications with key industries, such as dairy farming, as a parallel approach to working with ISBs (see more on this below).

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

We do not think that the Strategy needs additional or different priorities. However, DairyNZ recommends that:

- The Strategy explicitly consider the economic potential of key sectors (such as dairy) and ensure the tertiary system is equipped to support them (this relates mostly to Priority 2). This includes developing a funding model that recognises the strategic importance of these sectors. By aligning funding with sector needs and future workforce demand, the tertiary system can better contribute to national productivity and provide clear pathways for learners to progress into high-value industries.
- The Strategy provides more guidance on how priorities should be traded-off against one another.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	While we agree, we also need a system that recognises when learning has taken place and skills gained without quite as much reliance on assessment, a fine balance.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	DairyNZ's has a multi-year track record of investing levy payer money to support new entrants to the industry. Our experience highlights the need for wraparound support for learners transitioning from school into the workforce. Young people entering the dairy industry often face unique challenges, including relocation to isolated areas, limited life experience, and the demands of full-time work. To improve retention and wellbeing, we recommend investment in pastoral care (including, mentoring, life skills training, and structured onboarding support) be bundled with provision for entry-level workers. These services are essential to help young workers thrive and build sustainable careers in the dairy sector, and should be embedded as part of the tertiary system's commitment to learner success. We are concerned that, if anything, recent changes represent a step in the wrong direction. For example, the removal of the Strategic Component under the UFS reduces

	the ability for providers to investigate novel options to provide wraparound support for learners.
Do you have suggestions for additional activities to support this priority?	• Enable more wraparound support to ensure learners are supported during their pathway of learning • Sponsor research to evaluate the value of wraparound support relative to the value of core delivery. While we think that investment in higher levels of pastoral care is a good investment, we are not aware of any work that would allow us (or TEC) to compare the merit of this investment to, for example, delivery of management training to farm owners.

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree
Comments	We strongly support this. We recommend more transparency and clearer allocation of funding down to the sector and skill level. e.g. pasture fundamentals.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	• More transparency is needed about how and why funding is allocated. • More control should sit with the ISBs and sector bodies. We acknowledge that this is already a stated intent. However, we have concerns about the ISBs' (and hence industry) ability to have the influence needed – see response to Q9.
Do you have suggestions for additional activities to support this priority?	We think that ISBs need new tools and processes to engage with both industry and with TEC. In particular, ISBs need strong frameworks to:

	• Present choices to industry as to the provision they want, and to collect feedback on these choices. • Evaluate industry priorities alongside the other priorities that government has. See also discussion under Q9 – System delivery.

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	More regional accessibility is required. The focus should be on supporting all young people into careers, and having strong pathways for sectors, not just for learners who are deemed high risk.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	Specific funding to enable this accessibility is required.
Do you have suggestions for additional activities to support this priority?	As noted above, • More transparency is needed about how and why funding is allocated. • More control should sit with the ISBs and sector bodies. We acknowledge that this is already the stated intent. However, we have concerns about the ISBs' (and hence industry) ability to have the influence needed – see response to Q9.

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree

Comments	• Stronger collaboration with sectors to support skill development and pathways for learners is essential • Funding needs to be enabled to support innovative solutions and support sector driven solutions
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	There is good intent with the contributing activities, however it is a very complex problem and significant investment and collaboration is needed to help provide solutions.
Do you have suggestions for additional activities to support this priority?	Clear structure, roles and responsibilities are needed to ensure that the right people are engaged to achieve the required outcomes.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	No comment
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	No comment
Do you have suggestions for additional activities to support this priority?	No comment

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	

Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	Private Training Establishments (PTEs) are vital to New Zealand's vocational education system, delivering practical, industry-aligned training that supports careers and strengthens business performance. We think that they will be central to meeting sector needs in key areas like dairy, which provides significant export value, while maintaining quality and relevance. Meeting these expectations requires sustainable funding that reflects the true cost of delivery and enables long-term impact for learners, industries, and the economy.
Industry Skills Bodies (ISBs)	We are concerned that ISBs are being set up to fail. ISBs will not have the funding that WDCs have had to engage meaningfully with industry. Nor will ISBs have the direct connection to employers that ITOs enjoyed when they had the role of standard setting bodies. Consequently, we see a high risk that ISBs become reduced to undertaking the administrative activities associated with qualifications and quality, rather than delivering on their intended role of communicating industry priorities to TEC. To offset this concern, we think that ISBs need new tools and processes to engage with both industry and with TEC. For example, ISBs could: • Develop stronger processes to collect, collate and communicate industry preferences to TEC. They could develop online tools for industry to provide structured feedback on choices between training options. • Develop tools to evaluate industry priorities alongside the other priorities that government has. Some of our responses in this document show why this is important. For example, a. In Q4 to Q8 we, as an industry body, have ranked Priority 2 and 4 above Priority 1 and 3. How should TEC weigh our industry / employer-centric view compared to a more learner-centric view? b. As noted above, we believe that extra funding from wraparound support for entry-level learners is a good investment – at least on par with other training on offer to our industry. It would be good to validate this (or otherwise). It would be useful to have a tool or framework that weights priorities and the contribution that provision makes to those priorities.

Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
TEC and Industry bodies	In addition to working with ISBs, we think it important that key industry bodies retain the ability to communicate their priorities to TEC directly. We have observed that even while Muka Tangata has had the resources to engage well with us, some of our priorities have become 'lost in translation' in the advice provided to TEC. With ISBs less resourced to perform the role of industry liaison than WDCs, it will be important for TEC to open other channels to receive advice. We appreciate that TEC is even less able than ISBs to engage with every industry body with an interest in training. But we do think TEC should identify those industry bodies that represent New Zealand's strategic industries and open lines of communication with them.

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

The monitoring section provides a strong foundation, but it could be enhanced by clarifying the roles of key stakeholders, particularly how Industry Skills Boards (ISBs) and sector bodies contribute to assessing relevance and impact. It should include mechanisms for employer and industry feedback, and recommend that ISBs collaborate to advise TEC on funding priorities aligned with workforce needs. In addition to quantitative indicators, the strategy should incorporate qualitative evaluation—such as case studies, stakeholder interviews, and learner narratives—to capture the real-world impact of training. These additions would support more informed investment decisions and ensure the strategy delivers meaningful outcomes across the system.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

We have three final comments.

Hard choices, industry voice and empowering ISBs

A central theme of this feedback is the need to do a better job of understanding the costs and benefits of the options that a fiscally-constrained environment requires us to choose between.

We are concerned that the tertiary system does not currently have the tools to make good choices when deciding what should be funded. For example, is it better to invest in a training programme for a farm manager that will have a significant difference on industry productivity (TES Priority 2) but make limited difference to that manager's career prospects, or to invest in wraparound care to increase the chance of success of a new entrant to the industry (TES Priorities 1 and 3)?

We understand that the Strategy calls for the ISBs to provide leadership in this area. However, we restate our significant concerns that ISBs will not have the funding, the employer connections or the tools to do this job well. Of these three deficiencies, the later is probably easiest to address in the short-term and so we urge TEC to make this a focus.

We also highlight again that it will be important for TEC to establish its own lines of communications with key industry bodies.

Industry specificity

The Strategy does not clearly acknowledge the need to adapt provision to specific industries. For example, for the dairy industry we need:

- A tertiary system that responds to the unique challenges and opportunities faced by rural industries and communities.
- A strong focus on practical training that prepares learners for success in their roles, alongside industry-led programme design and equitable access to tertiary education for rural learners.
- To ensure that funding and delivery models support private training establishments and flexible learning pathways that meet the needs of the dairy sector.

We appreciate that it is not appropriate to set out these industry-level priorities in a high-level document like the Strategy. However, we think it would be valuable to highlight that the way that the Strategy is executed requires that the tertiary system is adaptive and responsive to different industry needs.

Transferrable skills

Included in the discussion of Priority 2 is an important sentence that references the types of skills needed by industry:

While employers will always need to support new recruits as they gain work experience, tertiary education providers must strive to ensure their graduates are job-ready with the right mix of technical and transferable skills such as communication, critical thinking, and adaptability.

Whether to focus on transferable skills or on technical skills is an important choice. This is a good example of the type of issue that TEC and ISBs should engage with industry on. In doing so, we think that TEC and ISBs should frame the discussion clearly as an example of the *difficult trade-offs* noted in the point on fiscal constraints on page 6. Arguably transferable skills have received too much attention in recent years at the cost of offering employers the technical skills training that they have a higher propensity to adopt.

Te Tāhuhu o te Mātauranga
Ministry of Education

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Te Kāwanatanga o Aotearoa
New Zealand Government

Submission by

The Employers and Manufacturers Association

to the

Ministry of Education

on the

Tertiary Education Strategy

September 2025

Employers and Manufacturers Association (Northern) Inc.
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About the Employers and Manufacturers Association (EMA)

Established in 1886, the EMA is New Zealand's largest business association representing more than 7,000 businesses in the upper half of the North Island. Combined, our members are responsible for employing around 25% of the country's workforce.

We are the unapologetic voice of the business community, advocating strongly on behalf of our members and the wider business community to ensure their voices are heard by government and decision-makers. In collaboration with our nationwide network, including BusinessNZ, Business Central, Business Canterbury and Business South, we represent and support over 76,000 member companies.

As a not-for-profit association, we provide trusted, expert and affordable advice to our members. Delivering a wide range of services, including learning and training courses, health and safety advice, employment support, and HR and PX services, we support our members to upskill and build capability in their teams.

More broadly, we aim to create an ecosystem of support for all businesses in New Zealand, enabling them, their people and their communities to prosper.

Contact

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Introduction and general comments

Thank you for the opportunity to give feedback on the draft Tertiary Education Strategy (TES). The EMA would like to support the Business New Zealand submission and echo their points raised. We also have several considerations that we wanted to respond to independently as we see them of crucial importance.

We support the draft objective for tertiary education and its focus on advancing an innovative, high-productivity economy. This acknowledges the power that education has in terms of contributing the skills our businesses need, the knowledge our universities and researchers require, and the impact this has on productivity and improving lives.

The tertiary education system needs to be closely connected to employers and industry- the challenge will be connecting with businesses in an authentic way. Businesses must be able to understand how they intersect with the education sector, how the work being done impacts them, and how they can influence things. The strategy must also be grounded in data to truly be an interconnected system, and work needs to be done to be able to have effective monitoring and analysis across all areas of the system that works together for better insights looking into the future.

The Tertiary Education Strategy (TES) is important as a connector between multiple actors and elements of the system, and we recognise the role that it plays in elaborating how the system can work as a whole. The identified challenges that the system must respond to, present opportunities that if we address properly now, we'll be well placed in the future. Across all of the areas of pressing challenges, we must use a coordinated, data-based approach to monitor and offer insights, as well as to identify and provide solutions.

This coordination can work alongside other guiding strategies or tools. We believe there needs to be an integrated workforce skills strategy which identifies the skills industry needs now and looking ahead, how we train for these needs across various education options, and how we engage with other areas in the system (e.g. Immigration, MSD etc). This would ensure we have the right skills available for our businesses and can offer sustainable and engaging pathways for learners. The skills strategy would have the role of identifying the specific skill needs, and map how/where these would be taught, as well as where we might need the immigration system to step in. The strategic direction and priorities of the TES would help inform how the skills strategy could be delivered on.

Priorities for the Tertiary Education Strategy

1. *Achievement*

No great initiative will have any significant impact without making progress in lifting learner achievement. Ensuring that providers are consistently focusing on improving achievement while grounding education in real industry needs will support career outcomes. Incentivising pass rates doesn't always drive actual learning or employment outcomes, and we need to

make sure the quality of skills being learnt is high whilst achievement is improved on, so we don't see the sector focus on volume rather than value.

There is some work to be done around what it means to expect providers to deliver on embedding labour market relevance, strengthening connections with industry and tracking employment outcomes. We don't want to make the system overly complicated and there will be opportunities here to streamline and coordinate how this is done to make it easier for all involved.

2. *Economic Impact and Innovation*

It was stated that the tertiary system must becoming more responsive to labour market signals and better integrated, and that the new Industry Skills Boards (ISBs) will be a part of this. We agree they have a role to play here but this only covers those industries nominated as "VET industries". This responsiveness and integration needs to be across all industries/education types not just in the Vocational Education and Training (VET) space.

The related action around strengthening industry leadership to ensure providers deliver what businesses and employees need also needs to be looked at across all tertiary education and industries, not just those covered by ISB's and in the VET area. Industries are not just "VET" or "University" industries, and as a country we need to do our best to move away from this siloed approach where students engage with either VET or University.

Employers need workers across both systems and may need people to move between the types of learning; for businesses, they don't care that the knowledge was learnt in the university or VET system, it's the quality of the learning and that the person they're employing has actually absorbed the knowledge that matters. An integrated workforce skills strategy would help here to outline what skills we need to build in a less binary way- we're all aiming to build a productive, inclusive economy for New Zealand's businesses and our people at the end of the day.

How foundation education providers should 'consider local industry needs to connect students/trainees with employment opportunities and develop stronger feedback loops with employers and industry' needs to be given more focus. There wasn't an activity linked to this, and the 'how' around this will be key. The broader eco-system is an incredibly busy one already for schools, education providers, and employers alike, and there needs to be a simple and coordinated solution here to make these connections otherwise we risk overwhelming schools and businesses with requests to tick off this action- without meaningful outcomes.

Apprenticeships and traineeships that providers develop do need to be prepared for changing industry environments as well as the skills employers need today, however there needs to be consideration around where they are getting the information on this from? This is where an integrated workforce skills strategy could support by providing this information to the careers function, ensuring the information is held in one place as a central repository to maintain consistency and quality.

The action around promoting knowledge transfer with universities connecting businesses and communities needs more thought about how this will be done. Universities aren't incentivised

for this activity, so without either another actor playing this role or supporting them, or the incentives changing, this will be hard to achieve.

3. *Access and Participation*

We especially support the focus on supporting people to upskill and retrain throughout their lives. That whole of life aspect is so important, especially when we consider our aging workforce, and the rate of change within industries and skillsets. Enabling people to participate in the workforce and to adapt their skillsets as needed to do this is very important. Actions that support this life-long learning approach will also be applicable to supporting those who face other barriers to participation.

BusinessNZ raised the need for flexible, modular delivery models to better enable this and we strongly agree that there needs to be a more flexible and modern approach to learning. We've recently seen many employers move away from traditional providers when looking to train their staff as they either aren't delivering the up to date, future-focused content they need, or not delivering it in a way that's practicable for them, their work patterns and their worker's needs. Ensuring that the 'how' of our education system adapts is critical, and this should be looked at not just in the vocational or work-based learning space but in the university area too. Enabling learners to learn what they need, when they need it, how they need it, will better support their career progression no matter their employment status.

High-quality information on career pathways and employment outcomes needs to be not just for students, but for career-changers also, and the information needs to be built alongside industry, covering all levels of education options as well as entrepreneurship across industries.

4. *Integration and Collaboration*

This is one of the most important priorities and areas of opportunity for the TES. The system currently is fragmented and inefficient and different users are not connecting or communicating well. Across both government and externally, we need more areas where we take a collaborative approach, so everyone is using the same data to drive towards shared outcomes.

We have already mentioned the opportunity to build an integrated workforce skills strategy. There is also a large opportunity in the monitoring, reporting and insights space, as well as in other areas like connecting businesses and research opportunities, building and telling stories about pathways within industry- there are many areas that are calling out for better collaboration.

Greater regional collaboration should also be looked at, at a national level. Whilst we acknowledge that we want the regions to shine, our metro areas also hold importance due to their economic size and potential impact, and we need to not ignore the power this has.

In the contributing activities, we think that there does need to be an actor which examines the integration of the system, supporting collaboration and spotting gaps to help activate connections.

5. *International Education*

International education is important for New Zealand; to strengthen our skills mix, bring cultural diversity to our communities, and support funding of our education systems.

We'd like to support BusinessNZ's points on how to better align international education's role with delivering on our skills needs and building better research and business partnerships for more long-term results.

System Delivery and Monitoring Outcomes

As BusinessNZ notes, funding has the biggest impact on driving behaviour. Many of the desired changes or activities in the strategy are likely be hampered by funding structures, so some honest conversations on how to enable these changes in a transparent and practical way is needed.

Monitoring should be transparent and visible to both providers and employers so everyone can make informed decisions and planning. One of the challenges currently is that much of the monitoring is not timely and not connected, so it makes it harder for both education providers and agencies to glean insights and respond promptly.

For business, very little has been created for their digestion that allows them to understand how the tertiary education sector has, will or could support their skills needs and how they engage with both educators and learners. There needs to be a strong focus on providing data and insights that aren't held in silos or duplicating other work being done, and translating this for businesses.

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30 September 2025

Katrina Sutich
Te Pou Kaupapahere
Ministry of Education
By email: tertiary.strategy@education.govt.nz

Tēnā koe

Draft Tertiary Education Strategy consultation

Thank you for the opportunity to provide feedback on the draft Tertiary Education Strategy. This submission reflects the views of Engineering New Zealand. Engineering New Zealand is the largest professional body for engineers in New Zealand, with over 23,000 members. We accredit New Zealand tertiary engineering qualifications to internationally recognised benchmarks.

Ensuring strong outcomes in tertiary education is a priority for Engineering New Zealand. Despite the recent economic slowdown, New Zealand faces a long-term shortage of skilled engineers. We need at least 2,300 additional engineers per year to keep up with economic growth. The tertiary education sector will be critical in resolving our skill shortage and ensuring future engineers are well equipped to have successful and productive careers.

The strategy provides helpful direction but is missing key components vital to improving productivity

Engineering New Zealand is supportive of the general direction of the strategy.

We do note that this strategy is missing the detail that would demonstrate how it will be achieved and what funding will support the strategy. The international education components of this strategy appear to have more detail and deliverables than the other aspects.

Sustainability and resilience will be a core competency for the future workforce

The strategy is missing the importance of sustainability and climate change resilience. For engineers, understanding how to design in a sustainable way is a core component of their mahi- becoming increasingly important as demand to better utilise resources and reduce waste continues to grow. There is a growing demand for green infrastructure solutions, in civil and structural engineering. Our future workforce needs to have a good understanding of these technologies and techniques to be able to respond to future challenges that New Zealand will face.

Having a robust understanding of climate change resilience is vital. New Zealand is already experiencing increased extreme weather events and has a high natural disaster risk profile; we see continued examples of infrastructure failing in these situations or not being designed in a way that can manage increasing environmental pressures. For example, our cellular network shutdown in cyclone impacted areas because it only had three hours of battery backup. It is important that our graduates understand this and can design solutions.

A future workforce that is enabled by technology requires understanding of the fundamentals

Technology will be a key component of enabling graduates to thrive in the workforce. Technology changes at a pace and scale that requires a good understanding of the basics to allow the future workforce to adapt to disruption and be able to make the most of opportunities. This strategy places a lot of emphasis on technology as a key enabler, which we support, but note it is vital that learners have a strong understanding of the fundamental principles of the technology not just experience in the latest technologies.

Cultural competency is already a required skill for the workforce

It is important for engineers to be culturally competent and understand ti Tiriti o Waitangi and mātauranga Māori. This understanding can create a more well-rounded workforce, ensure graduates understand specific requirements of their job (i.e. iwi engagement obligations) and increase innovation. Engineering New Zealand would like to see specific emphasis on cultural competency including within this strategy to reflect the requirements of the engineering profession.

The focus on STEM is welcomed but businesses cannot survive without other areas of knowledge

We appreciate this Government's commitment to STEM and improving outcomes particularly in science and math achievement. However, we are concerned that this focus may have an adverse impact on other knowledge areas. Successful STEM businesses require a mix of skilled workers with both hard and soft skills. As an example, in manufacturing an engineer can design an amazing product, but the profitability of that product relies on strong design, economics, communication and marketing to make it an attractive purchase for consumers.

Universities would benefit from central advice on workforce trends and industry needs

Engineering New Zealand has been strongly supportive of the role of the Workforce Development Councils, soon to be Industry Skills Boards (ISBs)- the work they do around strategic workforce needs, national consistency and industry advocacy is beneficial to the whole tertiary system and to the industries they serve. It is important that there is an alignment between the workforce, industry and the skills provided to learners across the tertiary system. Engineering New Zealand recommends that something like the ISBs be developed for the sector.

The success of this strategy will be dependent on funding

The strategy provides an excellent opportunity to improve the outcomes of the tertiary sector; however, success is dependent on having the funding available to deliver the strategy and undertake the required activities listed. Funding is already a challenge across the entire system and providers do not have capacity to increase their activities to deliver this strategy.

Long-term sustainability of tertiary institutions is crucial for delivering the skill-based education that fuels an innovation-led economy and economic growth. Universities are struggling to fund engineering programmes- as seen by the Massey University's closure of its engineering programme within its College of Sciences, due to extreme financial pressures.

Engineering New Zealand believes many of the activities listed in this strategy are excellent and would make a difference, but we are not confident that they will be resourced.

Detailed comments on the priorities for the strategy

<u>Achievement</u>
A focus on improving retention rates (and the distance travelled) is welcomed. Engineering New Zealand supports the stronger alignment between tertiary education achievement and employment outcomes at all levels of study. However, this enhanced focus must come with support and funding to match the increased resourcing required. This function should be provided by the ISBs and a similar entity in the university space.

We suggest that the first step to tertiary achievement is not enrolment, rather the transition from schooling to tertiary study. The strategy would benefit from improved focus on the transition from schooling and how to support learners-this is important for underserved communities. Encouraging students to enter tertiary education will be a key step in addressing skill shortages and ensuring a thriving tertiary sector.

<u>Economic Impact and Innovation</u>
Engineering New Zealand is supportive of efforts in this area. The ideas and contributing activities in this space are excellent but there is no clear plan, identification of levers or clear funding to enable them. The industry

desperately needs more engineers and a more sustained pipeline of work-ready graduates. However, two of our largest engineering schools are close to capacity- producing more engineers will require incentives to increase, develop, and enhance opportunities, which will require some kind of financial lever.

Access and Participation

Engineering New Zealand has serious concerns about declining levels of regional engineering provision, especially in vocational education. Several regional polytechnics have recently closed their New Zealand Diploma in Engineering programmes and even financially viable providers struggle to deliver the programmes independently. Providers should be working collaboratively as part of a wider network. We have concerns that changes in the vocational education space may revert us back to a competitive funding model where decisions are driven by profit rather than need or strategic importance, exacerbating existing challenges.

The focus on work-based learning provision is welcomed. Work to explore how to make diploma and degree level qualifications more accessible to learners will require significant investment. The same will be true for increasing high-quality blended and online learning.

Integration and Collaboration

We agree that collaboration between tertiary education providers and industry would be beneficial to enhancing the alignment between graduate skills and workforce roles. This could also lead to better outcomes for innovation, productivity, and resilience. Better collaboration could also lead to improved research and innovation within the private sector as graduates may have industry research experience.

Partnership between tertiary education providers and hapū and iwi to support Māori development aspirations and honour te Tiriti o Waitangi should be extended across the system not only within Kaupapa Māori provision.

Engineering New Zealand is supportive of capacity building in the Pacific. We have already identified opportunities to build engineering capability through our own work in the Pacific. However, we feel there needs to be clear incentives for this work as it will not be a core activity for providers.

International Education

We welcome the ideas and focus on increasing international education; we agree that there is significant opportunity to enhance the numbers of international students and market New Zealand's education system- particularly in qualifications covered by international agreements.

Engineering New Zealand would be happy to support efforts to enhance targeted marketing of engineering qualifications. We would like to see engineering as a focus area and can provide information on the benefits of Accord accreditation and pathways to employment and professional registration.

Conclusion

Thank you again for the opportunity to provide input into the development of the Tertiary Education Strategy. Engineering New Zealand is committed to working alongside Government to uphold and enhance the quality of engineering education. An enhanced tertiary education system has the potential to improve productivity and innovation in New Zealand as well as support a well-rounded and thriving workforce. We look forward to continuing to engage on the tertiary education system. If we can be of any assistance or provide further information, please do not hesitate to contact us.

Nāku iti nei, nā

9(2)(a)

30 September 2025

Submission on the Draft Tertiary Education Strategy (TES)

English New Zealand Incorporated
English New Zealand represents 16 long-established private and university English language providers in six different destinations throughout New Zealand. 13 are unfunded international providers (UIPs) only offering English language courses to international students. All are NZQA Category 1 (or equivalent for university centres) and must meet the globally benchmarked English New Zealand Standards, in addition to NZQA requirements.

Member schools, and other English language providers in New Zealand, offer courses from beginner to advanced level which are not award based. This product is offered in all major English language study destinations globally. A few providers offer NZCEL as a pathway into their institution groups' courses.

1.– 7. Proposed Objective and Drivers of Change
The TES covers a range of tertiary providers, most of which offer both domestic and international education, and are funded by TEC. The objective is therefore aligned with typical tertiary provision, qualifications and credentials based, rather than typical English language provision to international students. Drivers of change and the first four priorities are also aligned with award-based provision, and skills development in the context of workforce needs.

Provider peak bodies working in these areas, and receiving funding from the Crown via TEC, will be in a better position to provide feedback on these aspects of the draft strategy.

8. International Education
We strongly agree that international education should be a priority in the TES, particularly as "tertiary" covers a range of non-primary/secondary providers. However, in a system based on provider ownership, English language delivered solely to international students is often an outlier in terms of overall fit with tertiary system rules and regulations.

For unfunded providers focused on international students it is critical they are not negatively impacted by objectives, rules, and regulations aligned with domestic/funded provision.

The consultation document states, "At the same time, global student expectations are shifting towards more flexible, digitally enabled learning experiences, and stronger links between study and career opportunities." This is not the case for English language learning/study travel, so the TES should not use a one-size fits all lens for "tertiary" providers.

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Broadly speaking, we support the International Going for Growth Strategy, but much of it is 'business as usual' in approach. To fully develop opportunities and open new markets, it will require a bold, more ambitious cross-agency approach.

In relation to how this priority interfaces with the other TES priorities, once again it is crucial that English language/study travel is recognised as 'something different' and not inadvertently impacted by systems or strategies that have little or no relevance. Using the NZQCF change as an example, government agencies, including MoE and NZQA, have acknowledged that typical English language provision does not fit the requirements pedagogically. Internationally, while micro credentials may suit some education products, there is no evidence of any fit for English language, or any demand from learners for anything other than globally recognisable English language courses.

Roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy

As outlined in the consultation document, PTEs are diverse, and offer different levels of education. However, there is an expectation for alignment with "… priority outcomes, particularly for specific population groups and industries." This section of the draft strategy also focuses on TEC funding of providers and what they need to demonstrate. Most EL provision sits outside of this, and expectations need to be considered differently so they are fit-for-purpose/fit-for-context.

This is another example where non-award English language tuition, primarily delivered by PTEs (although also in universities and other sectors) is 'different'. Agency roles therefore need to take this into consideration and ensure that this valuable part of the overall sector is enabled to flourish, rather than be overwhelmed by non-relevant requirements.

We support agencies collaborating and reducing duplication and compliance burden for providers. This is particularly relevant where no Crown funding is at risk, and specific parts of the system e.g. Quality Assurance/Accreditation Rules and Regulations should be adapted to ensure they are relevant to different types of providers.

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

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Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	Hospitality New Zealand
Organisation category (please indicate):	• Other (please specify) ○ Industry Association
Role/position	9(2)(a)
Request to withhold part or all of the submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2) @hospitality.org.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

   We are supportive of the draft objective and the tone it sets for how tertiary education is delivered in New Zealand. However, practical execution is key to ensuring all industries and skill levels are catered for across the economy. For hospitality and accommodation, this means explicitly supporting the building of a skills pipeline - from schools through to apprenticeships, skill certifications, and continuous professional development. This approach will both strengthen the domestic pipeline of Kiwis entering the industry and reduce long-term reliance on migrant workers.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

   Demographic change is a critical driver. With an ageing population, emigration, and low unemployment, New Zealand will continue to rely on migrant workers to sustain hospitality and tourism. The TES must ensure that non-residents on work visas can access affordable training, as they represent a significant proportion of our current workforce. At the same time, to build a more resilient domestic pipeline, we need clear career pathways for young New Zealanders, integration of hospitality into NCEA, and early exposure through programmes such as EATucation.

   In addition, as student expectations evolve, the system must fund a wide range of learning options, not only qualifications, but also skill certifications, micro-credentials, and continuous professional development. This flexibility reflects how small businesses train staff while on the job.

   Technological change also needs context. While online modules, digital micro-credentials, and simulation-based training can enhance learning, hospitality remains a hands-on, people-centred industry. Technology should support service delivery, improve efficiency, and offer flexible training tools - but not replace practical, workplace-based learning. TES investment must balance digital infrastructure with hands-on training.

Priorities for this Tertiary Education Strategy

Do you think the Tertiary Education Strategy should have any additional or different priorities?

We are comfortable with the priorities as they currently stand.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

3. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy?	• Strongly agree
Comments	Hospitality is practical by nature and requires qualifications that are directly aligned with employment outcomes. However, most businesses are SMEs that need flexible, job-embedded training. The TES should fund short skill certifications, micro-credentials, and digital platforms such as Typsy, alongside apprenticeships and internships. Achievement in this sector must also account for "distance travelled": many entrants join with limited prior qualifications, and progress into stable, skilled employment should be recognised as success.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral
Comments	Expanding digital micro-credentials and online learning will support flexible, accessible training. However, consolidating vocational pathways under fewer providers may disrupt existing SME partnerships and on-the-job training, particularly in regional areas, reducing learner accessibility and industry engagement.
Do you have suggestions for additional activities to support this priority?	Fund flexible, job-embedded learning options, including stackable micro-credentials, digital learning, and recognition of experiential learning.

4. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	Hospitality is a cornerstone of the visitor economy, directly linked to tourism, regional development, and New Zealand's international reputation. It is also one of the largest employers of young people and migrants. Investment in research, technology integration, and service innovation can enhance productivity and create pathways for career progression. TEC should recognise that innovation in our sector includes digital learning, customer service technologies, and new workforce models - not just traditional R&D.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral
Comments	Vocational activities will sit with ISBs, but they may have limited resources and a wide remit. Expectations should be realistic regarding what can be delivered and in what timeframe.
Do you have suggestions for additional activities to support this priority?	Encourage targeted investment in digital service technologies, skills innovation, and workforce productivity initiatives.

5. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	The TES correctly identifies disparities for Māori, Pacific peoples, disabled learners, and those from low-income backgrounds, groups heavily represented in hospitality. Addressing barriers is not only an equity issue but also a workforce issue. Pathways into our sector are often undervalued: in schools, hospitality is sometimes seen as a fallback subject and current unit standards do not contribute to NCEA. This undermines parental and student support. We recommend reviewing school offerings, integrating hospitality standards into NCEA, and building clear transitions from school to tertiary and into employment. Participation must also reflect industry reality: training should be regionally accessible, flexible, and affordable. Expanding online delivery, stackable credentials, and paid "earn while you learn" options will directly support uptake.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral
Comments	Changes to NCEA may erode secondary pathways into vocational training. Regional polytechnic offerings are limited, and even in larger cities, cookery schools are often not sustainable. Online learning alone is insufficient; micro-credentials must be adequately funded.
Do you have suggestions for additional activities to support this priority?	Fund regional, flexible training options, including micro-credentials and online platforms, and review NCEA pathways for vocational inclusion.

6. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	Integration and collaboration are essential to creating a thriving workforce pipeline. Hospitality is well-positioned to partner with training providers and government to deliver high-quality work-based learning. TES should strengthen co-design with industry in curriculum development, so that what is taught at school, polytechnics, PTEs, and universities directly reflects industry skill needs. Partnerships should also be leveraged to market the industry as a rewarding career, addressing perception barriers that deter many young New Zealanders and their families.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Disagree
Comments	Secondary-to-vocational pathways are under pressure, and vocational work-based learning (WBL) may become fragmented, which could challenge consistent industry engagement.
Do you have suggestions for additional activities to support this priority?	Strengthen structured industry co-design, create clear WBL pathways, and improve engagement with SMEs across multiple regions.

7. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	International students should be viewed both as learners and as contributors to our workforce. TES should support positioning New Zealand's hospitality and tourism programmes as attractive areas of study, aligned with global demand. This can strengthen the pipeline of talent and reinforce New Zealand's reputation as a centre of service excellence. A balance is required between international students paying international fees and visa holders needing affordable access to training to remain effective members of the workforce.

How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	International student fees support a sustainable range of tertiary offerings, while affordable access ensures workforce sustainability.
Do you have suggestions for additional activities to support this priority?	Ensure work visa holders can access subsidised training alongside international student programmes.

System Delivery

8. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	Should focus on delivery aligned to industry skill needs, flexible learning, and regional accessibility.
Wānanga	Should focus on delivery aligned to industry skill needs, flexible learning, and regional accessibility.
Polytechnics	Should focus on delivery aligned to industry skill needs, flexible learning, and regional accessibility.
Private Training Establishments (PTEs)	Should focus on delivery aligned to industry skill needs, flexible learning, and regional accessibility.
Industry Skills Bodies (ISBs)	The wide remit and expectation to deliver while being established is concerning. They advise TEC but have limited accountability.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	ISBs provide advice to TECs but cannot enforce action. Roles and responsibilities must be clearly defined.
Other (please specify)	

Monitoring Outcomes

9. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Monitoring should include both quantitative and qualitative indicators:

- Learner outcomes: employment rates, skill certification completion, career progression.
- Equity outcomes: participation and success rates of Māori, Pacific, disabled, and low-income learners.
- Industry alignment: employer satisfaction, workforce pipeline development, and responsiveness to industry needs.
- Innovation: adoption of digital learning, new workforce models, and research impact.

Final Comments

10. Do you have any other comments on the draft Tertiary Education Strategy?

Hospitality and accommodation face both immediate workforce shortages and long-term perception challenges. The TES must support:

- Funding for non-residents already in the workforce.
- Flexible, SME-friendly training options (skill certifications, micro-credentials, online learning).
- Stronger school-to-career pathways, including integration into NCEA.
- Promotion of hospitality as a sector of choice, with clear career progression.
- Use of workforce forecasting data (e.g., Ringa Hora) to inform investment.

While we support the overall direction of the draft TES, the detail and delivery mechanisms must match high-level objectives. Clear roles, adequate resources, and realistic expectations across tertiary providers, ISBs, and government agencies are essential. Without this alignment, ambitious goals risk being unattainable. Embedding these priorities will help create a vibrant, sustainable, and skilled hospitality workforce essential to New Zealand’s economic prosperity.

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Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

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Submitter details

Full name	9(2)(a)
Organisation name	International Aviation Academy of New Zealand
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.* Nil.
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @iaanz.co.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

We support Aviation Industry Association New Zealand (AIANZ) submission and strongly agree with their comments towards the Tertiary Education Strategy.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	We agree with the AIANZ recognition of licenses and ratings as achievement. Aviation qualifications are structured around regulatory requirements. Licence and rating attainment should be treated as core indicators of achievement, as they directly correlate with employability and industry readiness. While we agree that achievement should be a priority, there are some contributing activities that are outside the scope of aviation training – for example disability action plans – due to the strong requirements around pilot medicals. TES should work with industry bodies to define meaningful progress indicators that reflect the unique structure of aviation training.

Do you have suggestions for additional activities to support this priority?	

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Aviation is a strategically vital sector for NZ, contributing to national productivity through transport, tourism, freight, emergency services, and defence.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Unlike universities or polytechnics, aviation PTEs usually don't engage in research, innovation, or broader knowledge transfer — so their contribution to the TES's innovation and productivity goals may be narrow.
Do you have suggestions for additional activities to support this priority?	The aviation sector is facing critical workforce shortages, particularly in engineering, maintenance and flight operations. These shortages pose risks to national connectivity, economic resilience and safety. TES should target investment in aviation training programmes to address workforce gaps. TES should also enable flexible training pathways to attract and retain diverse learners. We also recommend to that the TES includes aviation into Industry Skills Boards to ensure qualifications remain relevant and response. We suggest including aviation representation in the governance and advisory structures of Industry Skills Boards. This will help with facilitating feedback loops between industry and providers.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Aviation training is uniquely positioned to support regional development, provide high-value career pathways, and contribute to a more inclusive and productive economy. However, access to aviation education remains constrained by cost, geographic concentration, and limited visibility of career pathways.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	Access to aviation training is often inaccessible to lower-income learners, due to the high costs of training and lack of financial support, (e.g. percentage of student loan compared to total cost of qualification). Changes need to be made to the EFTS gap as this is a significant barrier that is preventing access to underserved learners. Aviation remains a field with low participation by Māori, Pacifika, women, and disabled learners. Without targeted pathways, the TES goal of lifting equity won't be met. In order to remove this barrier we recommend changing the EFTS limit that is currently imposed on aviation training. This will then reflect the true cost of aviation training and assist those who are underserved learners.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Aviation training is already a model of effective collaboration. The TES should build on these strengths by ensuring aviation representation in governance structures, supporting regional

	partnerships, and recognising the sector's unique operational and regulatory context. Collaboration must be purposeful, sector-led, and aligned with the realities of aviation education.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	The aviation sector has long-established collaborative frameworks involving regulatory bodies (CAA), employers (Airlines, General Aviation operators) and training providers. TES should recognise and support these existing structures rather than seek to restructure or centralise them further. While we support sector-wide coordination, we caution against any mandated structural integration that could undermine provider autonomy, flexibility, or responsiveness. TES should focus on enabling collaboration, not enforcing uniformity. Again, we recommend having aviation representation on industry skills boards.
Do you have suggestions for additional activities to support this priority?	

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	We strongly support the inclusion of International Education as a priority in the TES. Aviation contributes $24 billion, 5.6% of GDP to the NZ economy. Aviation training is one of New Zealand's most valuable export education sectors, with the global demand for pilot training and engineering qualifications continuing to grow. New Zealand's reputation for safety, regulatory rigour, and quality instruction positions us as a trusted global aviation training hub. As a PTE aviation provider with over 35 years of international operations, we have

	consistently attracted students from across the Asia-Pacific, Europe, and the Middle East. Our graduates go on to work in commercial airlines and operations worldwide. Aviation education not only contributes to export revenue but also strengthens New Zealand's global connectivity, innovation ecosystem, and international reputation.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	Aviation training PTEs often rely heavily on international students for financial viability. This reliance introduces risk, as shown during COVID-19 border closures. The TES should ensure that aviation training provision is both financially sustainable and resilient to external shocks. NZ aviation has a strong reputation for pilot license quality. It is important that TES supports aviation training as a globally recognised export sector that aligns strongly with NZ's international education goals. Also to ensure immigration and education policy settings do not compromise safety or quality.
Do you have suggestions for additional activities to support this priority?	The TES should prioritise aviation in the International Education Going for Growth Plan including promoting NZ as a global centre of excellence for aviation training, which can be done through visible international promotional campaigns and agent networks. TES should support aviation providers in building international research collaborations, participating in global innovation networks, and expanding cross-border training partnerships

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	

Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

We agree with the AIANZ comments regarding adding aviation specific indicators to include licence and certification attainment rates across pilots and engineers.

Final Comments

11. **Do you have any other comments on the draft Tertiary Education Strategy?**

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Submission on the Draft Tertiary Education Strategy

30 September 2025

Introduction

Independent Tertiary Education New Zealand (ITENZ) welcomes the opportunity to comment on NZQA's paper *Finalising the design of the Integrated Quality Assurance Framework (IQAF).*

As a national peak body for Private Training Establishments (PTEs), ITENZ represents 162 members, including 140 NZQA-registered PTEs delivering to over 25,000 EFTS across New Zealand.

Member PTEs include both funded and unfunded providers, range from the smallest to the largest PTEs in the country, and serve a wide range of learners and industries across New Zealand. They deliver programmes from L1-L9 on the framework, may deliver on campus, online or in workplaces, and teach and train domestic and/or international learners.

The terms of this targeted consultation allowed ITENZ to consult with members to inform our submission. We have also appended two of those submissions in full to this document and request that you take account of their views also.

Executive summary

The Draft Tertiary Education Strategy 2025 sets a clear vision of advancing a high-productivity economy and improving quality of life through knowledge and skills. Its focus on economic growth is understandable in the current climate, and its commitments to exceed OECD standards, address the needs of underserved learners, and promote lifelong learning are welcome. The emphasis on digital and data skills, flexible learning, and shorter, cumulative learning pathways reflects genuine system needs, and PTEs are well placed to contribute.

At the same time, the Strategy could be more ambitious. It risks narrowing tertiary education's purpose to economic outputs, overlooking its broader role in strengthening society, democracy, wellbeing, and intergenerational prosperity. Several areas would benefit from refinement: defining what "quality" means, ensuring R&D and research funding are aligned with both industry and learner needs, streamlining qualification development, reducing compliance costs, and creating supportive funding models. Foundation education, vocational pathways, and international education policy settings also require further attention, particularly alignment between immigration and education policies.

Overall, the Strategy provides a useful foundation, but it will achieve more if economic and social goals are pursued together, and if providers are supported through enabling policy and funding settings.

Detailed comments

The Draft Tertiary Education Strategy 2025 includes the vision of *a tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.*

While the Strategy's *unapologetic focus on economic growth* is understandable in the current climate, the vision could be more ambitious, explicitly recognising tertiary education's role in building society, democracy, and wellbeing. A dual emphasis would show that economic growth and societal goals are mutually reinforcing. Economic growth should remain a current priority within that. For example, Ireland's vision is to *develop Ireland's tertiary education, training and research to support people to reach their full potential and create a prosperous, sustainable and vibrant society, ready to meet the challenges of a changing world*. New Zealand's vision could equally acknowledge the importance of tertiary education contributing to health, social cohesion, and intergenerational prosperity.

The document rightly emphasises that *teaching and research across the tertiary education system must equip New Zealanders to navigate and shape complex changes.* It focuses on technological and workplace changes but overlooks the current, fast-paced and ongoing changes to society and democracy and the role of tertiary education in shaping and/or navigating them.

The commitment to exceed OECD standards and to address the needs of underserved groups is welcome.

The TES recognises that New Zealand produces high-quality research but lags in commercialisation and R&D intensity. Improvements in this area should be accompanied by a national move to increase R&D and integrate it into economic growth strategies. Stronger collaboration between research institutions, industry, and government funding

could deliver greater impact, particularly if it incentivises co-investment and rewards innovation that meets both industry and learner needs.

Coordination between research funding, industry needs, and government priorities would help maximise return on investment.

Improvements in this area should be accompanied by a national move to increase R&D and the integration of R&D into economic growth strategies, supported by government funding.

While the Strategy emphasises research for economic value, focusing on commercialisation and partnerships with industry, it should continue to strongly support academic, discipline-specific research.

The Strategy notes that technological change is reshaping work and life, and that digital and data skills will be in demand. We agree that critical and humanities skills will need to be developed to ensure people can develop, engage with, and critically evaluate new technologies.

We agree that there are evolving student expectations and the need for lifelong learning and retraining. In order to meet these needs, a less constrained and more streamlined qualification development system is required; providers require more flexibility to meet these needs.

Fiscal constraints are highlighted as requiring sharper prioritisation and efficiencies. PTEs already deliver extremely efficiently and government can amplify this with funding models that are supportive.

Reducing the cost and time for employers and learners to participate in tertiary education is important for efficiency and productivity but not necessarily for learning. It is important that the correct balance is maintained. Government must create supportive conditions if it wishes to see improvements, for example targeted investment, funding or co-funding, or other incentives that encourage lifelong learning of employees.

Compliance costs and inflexible programme structures discourage providers from responding to labour market signals quickly. New Industry Skills Boards may help, but they will need to be faster and more flexible than existing arrangements.

The strategy calls for shorter, cumulative learning options and flexible delivery. PTEs are well-placed to deliver these, including in regional areas.

We agree that international pressures and demographic change will shape tertiary education and we agree on the need to raise achievement for Māori, and Pacific learners.

Quality is mentioned 16 times in the document without any description of what this means. A shared definition would make this more meaningful.

Research into the best way to meet industry and learner needs is also important. Replacing funding previously allocated to Ako Aotearoa and CoVEs with sustained funding for tertiary-teaching and learning-focused research would demonstrate government commitment and ensure evidence-based innovation continues to strengthen the sector.

The priorities, Achievement, Economic Impact and Innovation, Access and Participation, Integration and Collaboration, International Education are generally measurable and useful.

We support the move to a greater focus on *distance travelled* or *value added*. More and better data and better connectivity of data sources across the whole system would allow us to better understand tertiary education outcomes.

The statement that changes to vocational education and training will enable more providers to move into work-based learning and apprenticeships is not borne out by experience so far. Opening up access would enable that to happen.

Foundation education is expected to connect students to local employment; it should also pathway into further study. A review of Foundation education would ensure it meets its objectives.

Finally, the International Education priority underestimates the role of policy settings. New Zealand already has a high-quality sector with strong student experiences. The greatest barrier is not quality or promotion but immigration and visa settings. Stronger collaboration between government and providers at the earliest stages of policy and project design would ensure immigration, education, and international positioning strategies reinforce one another.

Thank you

For further information, contact9(2)(a) @itenz.co.nz

Appendix 1: Skills Group submission

Attached as separate document

Appendix 2: Fruition submission

We welcome the Draft Tertiary Education Strategy (TES) and its ambitions around enabling individuals, driving innovation, and strengthening regional prosperity. Yet we note the strategy gives limited attention to workforce development in the **food and fibre sector**, despite the critical role that agriculture, horticulture, and allied industries must play if New Zealand is to double its food and fibre exports.

Horticulture New Zealand's *Aotearoa Horticulture Action Plan / Growing Together 2035* (AHAP) is a sector-led, government-enabled roadmap built around five outcome pillars:

- Grow sustainably
- Optimise value
- Māori are strong in horticulture
- Underpinned by science and knowledge
- Nurture people

That plan sets out 76 specific actions to drive transformation across the value chain, including a strong and explicit focus on building capability and people (the *Nurture People* pillar. The AHAP has been elevated through its Implementation Roadmap (2025–2027) and is being aligned with Government efforts, recognising that sustained progress must be co-owned by industry, government, Māori, and research partners.

We strongly believe that the TES should integrate its ambition with AHAP's workforce imperatives. If the tertiary system does not explicitly respond to this sector strategy, a major gap will emerge between national economic goals and capability supply.

Furthermore, TEC has invested heavily in the research undertaken by the Food and Fibre Centre for Vocational Excellence (Food and Fibre CoVE) over the past five years. This research should inform the TES. Specifically:

- Incorporate findings from Food & Fibre CoVE's *Attraction & Retention Research*, which shows that improving retention—particularly in the first 12 months—yields greater gains than attraction alone. Support wrap around pastoral care, mentoring, and onboarding programmes to lift retention. This can be achieved partly through work based training or off-job training with those in the food and fibre workforce.

Key Recommendations

1. **Explicit recognition of food and fibre sectors**
   Within *Priority 2: Economic Impact and Innovation* (and related priorities), include food & fibre as a named sector that warrants enhanced funding, programme support, and alignment with export growth ambitions.
2. **Workforce pipelines aligned with AHAP goals**
   The TES should enable and prioritise education and training pathways (from micro-credentials, apprenticeships, to diploma and degree levels) tailored to horticulture and agritech, in alignment with the *Nurture People* outcome in AHAP.
3. **Partnerships and co-governance with industry, research and Māori**
   Leverage the quad-partner structures established in AHAP (industry, Māori, science, government) to co-design curricula, work-based learning, and research projects so that tertiary provision is responsive to real sector needs.
4. **Monitoring, iteration and alignment of indicators**
   Link the TES metrics and accountability mechanisms to AHAP progress indicators (for example, capability growth, uptake of new skills, retention in the sector) so that educational investments can be evaluated in relation to export and productivity goals.
5. **Support School-to-Work Transitions**
   Build on CoVE's *Pathways and Transitions* work by strengthening secondary-tertiary pathways, scaling successful initiatives such as horticulture internships and micro-credentials that create early exposure to industry.
6. **Leadership Development**
   Invest in a nationally coherent food & fibre leadership framework, as highlighted by CoVE's *Leadership System Research*, ensuring pathways from entry-level to senior leadership, with recognition in the NZQAF and culturally responsive design for Māori.

Conclusion

The AHAP is a credible, sector-led blueprint for doubling horticulture's value in a sustainable and inclusive way. The TES must not operate in isolation from it. Furthermore, the research output of the Food and Fibre CoVE provided valuable insights into vocational training that need to be factored into any education strategy. Embedding explicit support for food and fibre workforce development into the TES will help ensure that the tertiary system becomes a central enabler of New Zealand's export ambitions and regional resilience.

9(2)(a)
@fruition.net.nz |

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

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- completing an online survey https://education.surveymonkey.com/r/DraftTES
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Submitter details

Full name	9(2)(a)
Organisation name	Kiwi Innovation Network Ltd (KiwiNet)
Organisation category (please indicate):	• Other (please specify) – national commercialisation consortium
Role/position	9(2)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2) *@kiwinet.org.nz*

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	We strongly support a TES focus on economic impact and innovation. New Zealand already has a proven commercialisation "bridge" that pairs deep local engagement by institutional TTOs with national programmes - Commercialisation Partner Network (CPN) and PreSeed Accelerator Fund (PSAF). This model delivers >10× returns from PreSeed despite being materially underfunded relative to peers; the TES should strengthen these foundations rather than reinvent them.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Direction is right, but effectiveness hinges on scaling PSAF/CPN, a funded capability programme, and a national spin-out framework — which we recommend the TES makes explicit. **What success looks like:** • Robust local commercialisation engines in every university/PRO, backed by a centrally coordinated, locally delivered capability programme, freeing PSAF to fund projects and lifting ROI. • A coherent national delivery layer (CPN) that provides a single front door for investors and industry, shared international business development (BD), and a national marketplace for services and programmes.
Do you have suggestions for additional activities to support this priority?	• **Scale project funding through PSAF/CPN** (multi-year, inflation-proofed) and ring-fence ~5% of major research grants for commercialisation pathways managed at provider level.

	• **Stand up a Commercialisation Capability Programme** within each university/PRO (~$20m p.a. nationally) — centrally coordinated via the CPN and locally delivered — to provide stable capability funding for core TTO roles, researcher engagement and on-campus entrepreneurship; decouple capability from PSAF so PSAF can focus on projects (lifting throughput and ROI), set clear capability benchmarks and simple performance metrics (co-funding, licensing, spin-outs, researcher participation), require modest institutional co-funding over time, and use the CPN "marketplace" so every provider can access best-practice tools and national programmes without losing local autonomy and without centralising delivery. • **Crowd-in private capital** by mandating an early pre-seed co-investment pool via NZGCP/Aspire delivered through CPN, aligned to TES outcomes. • **Adopt a national spin-out framework** aligned to the forthcoming IP policy to create consistent, investable pathways for founders and investors.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	

Do you have suggestions for additional activities to support this priority?	

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	We strongly agree. NZ's competitive edge is collaboration: local TTO delivery plus national coordination through the Commercialisation Partner Network (CPN). The TES should explicitly enable national-level integration (platforms, shared international business development (BD), national marketplace) while maintaining local autonomy, and encourage universities to bring private sector partners in earlier across discovery-to-deal flow.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Needs explicit broadening/formalising of CPN as the national delivery platform (single front door, shared international business development (BD), marketplace) to fully deliver the intent.
Do you have suggestions for additional activities to support this priority?	Broaden and formalise the Commercialisation Partner Network (CPN) as the national delivery platform (with an enhanced leadership group), integrating ex-Callaghan programmes and creating a true single front door for investors, NZTE and talent. Operate a CPN "marketplace" of best-practice tools, specialist programmes and shared services that universities can procure as needed. Strengthen joint international business development (BD) and co-design mechanisms so institutions engage industry/VC earlier (problem discovery, validation, pilots, co-funding), particularly internationally.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	[Comment]
Do you have suggestions for additional activities to support this priority?	[Comment]

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

We support a concise, internationally benchmarked monitoring framework that focuses on **meaningful commercialisation metrics** and avoids perverse incentives. The Association of Tech Transfer Professionals' (ATTP) global metrics initiative with the World Intellectual Property Organisation (WIPO) (toward inclusion in the Global Innovation Index) is the right locus for standard-setting; NZ should align the TES monitoring framework to **ATTP/WIPO definitions** rather than inventing bespoke KPIs. KiwiNet can act as NZ's conduit into this work and help the TEC embed it consistently. (Context: NZ institutions already contribute to SCOPR (Knowledge Commercialisation Australasia – KCA) survey – the Australasian "Survey of Commercialisation Outcomes from Public Research"; ATTP work is consolidating definitions and benchmarking across countries.) International metrics can be calibrated to a NZ context using the Aotearoa Research Impact – Community of Practice (ARI-CoP) impact pathways frameworks (formerly iPEN).

Suggested indicators (benchmarked and normalised by research spend):

- **Inputs & pipeline:** Invention disclosures received; investment leveraged (public & private) and including PreSeed Accelerator Fund (PSAF); researcher participation in commercialisation/entrepreneurship programmes.
- **Throughputs:** Licences/options/assignments; spin-outs formed; time-to-first deal; follow-on capital via national programmes.
- **Outcomes/impact (with lag logic):** Known realised revenue to NZ; jobs created; export growth attributable to research-derived ventures; private co-investment mobilised via CPN.
- **System health:** Capability measures for TTOs (FTE stability, training/RTTP uptake), and collaboration indicators (use of marketplace services, joint international business development (BD) engagements).

How to implement:

- TEC to **publish an annual commercialisation dashboard** aligned to ATTP/WIPO standards and the TES monitoring chapter, with intermediate measures acknowledging time-lags.
- Use CPN to **collect, QA and report** consistent national data across providers (universities and PROs), reducing duplication and compliance costs.
- Leverage the **ARI-CoP (formerly iPEN)** to co-design NZ-specific impact pathways and case-study definitions so narrative outcomes complement the core metrics set.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

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Ministry of Education

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Submitter details

Full name	9(2)(a)
Organisation name	The MacDiarmid Institute for Advanced Materials and Nanotechnology
Organisation category (please indicate):	• Other Centre of Research Excellence
Role/position	9(2)(a)
Request to withhold part or all of submission	*N/A*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @vuw.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The draft objective encompasses achievement, 'enables people to succeed'; economic impact 'an innovative, high-productivity economy'; it also captures public good outcomes 'improve quality of life'. In contrast to the first two points, the public good outcomes are not explicitly reflected in the priorities. Nor is access and participation, in particular, reflected in the overall objective.

In particular I wonder if this last point could be emphasised by changing the objective to 'enables *all* people to succeed…'. Or even to 'enables *all* people to *thrive and* succeed…'. The tertiary education system contributes to the well-being of those who do not participate in it, through the provision of expertise needed for e.g. our health system, and it would be good to see this reflected somehow at a high level.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

On the whole both the local and international drivers are well outlined. I'll comment specifically on the statement that 'New Zealand's higher education institutions produce high-quality research in many areas but lag leading international comparators in research commercialisation, industry collaboration, and overall research and development (R&D) intensity'.

A key factor underpinning this low intensity is the very low investment by government in R&D by international standards. The importance of research in tertiary education strategy is such that this needs to be acknowledged; in particular the availability of PhD level skills is something that limits the development of high-productivity industries. We have seen positive movement in recent years (the expansion of private and international deep tech and clean tech investment as per the most recent TIN report) but such gains are threatened by cuts in public research funding that put pressure on the entire ecosystem.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

I am not convinced that the International Education priority sits at the same level as the others (I will comment specifically on my reasons for that lower down) and I think that there is something missing that would address the important need to build social license amongst New Zealanders for the value of our tertiary system. All tertiary education investment has a positive return on investment for all New Zealanders, **even those who are not participants in it**, and this is too often missed.

The value of research and of research skills to the development of high-productivity industries is one particular element I would like to see better reinforced; the importance of our tertiary sector to the well-being of all New Zealanders through the provision of health services and other skills that support our environmental well-being (for example) are also useful examples.

Perhaps **Return on Investment for all New Zealanders** would be a sensible way of capturing what I mean; I see it as distinct from both Economic Impact and Innovation, and from Access and Participation (though it overlaps with both) and I definitely see it as more important than the priority of International Education.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	I strongly agree that poor completion rates are a problem, undermining confidence in the value of the tertiary sector and limiting the return on investment that we expect. I agree that the structural barriers to achievement of the specific population groups should be a focus for improvement.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Neutral (Agree and Disagree on particular things)
Comments	I agree with the focus on 'distance travelled', as it minimizes some of the inefficiencies related to underachievement. However, I would like to see this reflected less in the idea of sub-degree certificates or reduced value qualifications, and much more recognition that students who start their studies behind the average level of preparedness, in general because of inequities in secondary-level education, should be provided with more time, resource, and support to cover the larger distance needed in order to maximise outcomes and value of tertiary education investment.
Do you have suggestions for additional activities to support this priority?	Average expected timeframes to 'completion' should be considered secondary to the idea that progress is being made (e.g. by 'distance travelled' measures of achievement). Perhaps more holistic 'progress' measures of student success could be developed by institutions to communicate this to students.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree

Comments	Of course, economic impact is a key outcome of tertiary education investment. This is in part through innovation, and I do think this is worth insisting on (though this is connected to my thoughts on the importance of government investment in research outlined above, and that this is the major factor that undermines our ability to build the necessary critical mass and sustainable, efficient ecosystem in Aotearoa).
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Disagree (but agree on a few things)
Comments	Of course there is economic value from all investment in tertiary education. However on balance, I am pessimistic about the idea that major gains in economic return can be achieved merely through demanding a 'stronger emphasis on the economic relevance and impact' (though I note that this is noted as being particularly relevant to vocational learning). There Is a need to build critical mass across the country, in fundamental research areas, and in commercialization support and integration. Of course many of these activities sit more closely within the remit of MBIE, but an effective tertiary education strategy must take into account that activity. I specifically disagree that 'reforms to the science and innovation system will reinforce this shift by sharpening priorities, aligning funding, and rewarding commercial outcomes'. Too much focus on priorities undermines academic freedom in research and the fundamental studies that develop IP with real commercial value. There seems to be the impression that topics of research can be preselected by government for investment and then the work invested in can still span the full range from fundamental to applied. I would strongly suggest that this is not true, and that the incentives for researchers to shift sideways to align with areas of government priority in fact undermine depth of expertise in areas where that depth is precisely what is needed to develop IP. A thriving broad base of investigator-led research, together with an ecosystem that supports research translation, is what most enables commercialisation activity to thrive.

Do you have suggestions for additional activities to support this priority?	An increased scale of investment for fundamental research, in particular to the Marsden Fund. The MacDiarmid Institute would also be very happy to share the work we have done around entrepreneurial education for graduate students, if useful.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	I appreciate the importance that has been placed on this, in particular that 'tertiary education should be available to all who can benefit from it, regardless of background or circumstance'. I also appreciate the comment about regional provision.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	I am slightly concerned that the focus on vocational and work-based learning in the activities listed suggests that access and participation are less important for universities to focus on. I would argue the opposite.
Do you have suggestions for additional activities to support this priority?	

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	The biggest challenge for our tertiary education system – whether considering access to tertiary study from the regions, or the ability of our research sector to drive productivity – is the lack of critical mass caused by our low population density. The Centres of Research Excellence have been an effective way of addressing this in the research

	sector; other mechanisms to support integration and collaboration of teaching across the country are overdue.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree (and in some ways disagree)
Comments	There are significant practical challenges for institutional collaboration. Between PROs and universities, for example, the different overheads on grants can and do cause tension. While there are good mechanisms for inter-institutional contracting, in principle, continued restructuring in our university sector has at times provided real barriers to starting research projects on time. While I agree on the one hand that increased specialization of institutions may be helpful if complemented by inter-institutional cooperation, it is worth being clear that specialization may drive a loss of critical mass within a given institution that can have employment impacts that are undesirable and undermine the stability of the ecosystem.In the case of universities, both teaching and research impacts need to be considered.
Do you have suggestions for additional activities to support this priority?	

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Disagree
Comments	I am delighted to work with international students and have many times talked about the graduate profile of the MacDiarmid Institute (about 2/3rds of our PhD students come from overseas; about 2/3rd stay and work in NZ after graduation) as a brain gain for Aotearoa. However this is not how I read the priority of International Education outlined in this strategy, where the goal seems to be to artificially inflate the size of our institutions by bringing in students from overseas. As seen by the impact of the pandemic on international student numbers internationally, and the subsequent financial impact on institutions, this is a risky strategy

	In particular, my concern is that this priority risks undermining some of the other much more important priorities outlined in this strategy. The financial incentives for the encouragement of international students are already in place, as are the mechanisms (international rankings etc.) that support international recruitment. I think the role of a strategy should be to complement and in some cases counter existing incentives within the system, and for this reason I think that having International Education as a priority is problematic. The financial incentives already exist.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	I see it as conflicting. I would be happier with such a focus on International Education if the argument went that (a) they bring value and a depth of experience to our institutions and (b) our institutions struggle to have sufficient critical mass to be financially sustainable, therefore having an inclusive approach to international education benefits us all. However the explicit mention of 'the pathway to double export revenue' makes me very nervous about this. Our publicly funded tertiary education system is first and foremost something that exists for the benefit of all New Zealanders. All the challenges that have been outlined elsewhere in the strategy: the productivity gap; upcoming and continued demographic change; barriers for certain demographic groups; the need for inter-institutional collaboration; all of these challenges need to be prioritised over increasing export revenue from international students.
Do you have suggestions for additional activities to support this priority?	My suggestion would instead be that we have a healthy quota of international students provided for in our education system, for all the positive benefits that international students provide, but that we only charge domestic fees for such students. This would be a driver of excellence, support equity and international science-diplomacy (education-diplomacy?) and avoid the distortionary effects of over-reliance on international student income that we have seen too often elsewhere.

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	There is a bit in the Education Act about the breadth of disciplines that a University is expected to include (across the humanities, sciences, and beyond). I wonder if, in the context of increased 'specialisation' having been suggested in the strategy, it might be helpful to include this need for diversity in the expectations.
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Final Comments

11. **Do you have any other comments on the draft Tertiary Education Strategy?**

Thank you for the opportunity to comment

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Submitter details

Full name	9(2)(a)
Organisation name	Massey University University Te Kunenga ki Pūrehuroa
Organization category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	Nil
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @Massey University.ac.nz

Objective and Drivers for Change questions

1. Do you have any comments on the draft objective for tertiary education?

The objective of the draft TES aspires to create '[a] tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life". While admirable, this statement does not acknowledge that students come to university and tertiary study from very different starting points; we consider the term *enables* is not sufficiently equity focused and encourage more forceful and confident language.

The draft objective should caution against narrowing the purpose of tertiary education to primarily economic outcomes alone. Instead, it must uphold equally the intrinsic value of higher education, fostering critical thinking, civic engagement, and cultural enrichment for the public good. Research and discovery should continue to contribute to national and community interests and social and environmental outcomes not solely economic productivity. While the objective acknowledges the importance of the strategy in helping to achieve the Government's economic goal, it could place more emphasis on the Government's, wider social and environmental goals; including climate change (although I note climate change is mentioned in this objectives section), sustainability, equity. Critical analysis and thinking skills, problem solving, along with people skills, will become more important in a world that is constantly changing — especially as technologies like artificial intelligence reshape industries and challenge traditional skillsets — rather than solely focusing on subject-matter specific or narrow technical skills. This is crucial for preparing graduates to succeed in our ever changing world, including the evolving future of work, which must emphasise lifelong learning due to the shelf life of domain knowledge that is now rapidly changing. A single degree is no longer expected to equip an individual for life and constant upskilling and learning will be required in the near future.[1] We suggest, therefore, that a more balanced framing would better reflect the entirety of the sector's multifaceted contributions and societal needs in future years.

Further, research should drive and inform teaching, emphasising the 'research-teaching nexus, a critical definition of a university. We anticipate that given the ambitions contained in this document, there will be a need for targeted funding for research translation and commercialisation, continued support for cross-sector innovation hubs and incubators, and more promotion of and incentivisation for interdisciplinary and transdisciplinary research that addresses national challenges. Furthermore, creativity is vital for innovation and must be recognised, with investment balanced across all subjects, not just technology and science. Finally, the current funding system creates a dissonance between the ambition for research and the actual support mechanisms for areas like Mātauranga Māori.

2. Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

The current funding system is not designed to support life-long learning. With social and economic disruptors, such as GenAI, the demand from students to earn while they learn is likely to continue to increase. In particular, the future system needs to be able to cater for a more diverse learner cohorts, from young people transitioning directly out of secondary and seeking a tertiary qualification, through to adult learners, who will need to retrain or gain additional or new skills to engage in meaningful employment.

The student expectations and career patterns driver conflicts with how we currently measure EPIs. The driver states that 'Students' expectations for how and what they learn are being shaped by their experiences with technology in their daily lives. They will need to build resilience, adaptability and an ability to continually upskill throughout their careers as economic and technological trends disrupt and displace established

[1] How should universities serve the 100-year life span?

occupations and industries while creating new ones'. In our view, the tertiary education system should provide mechanisms to support student participation at all levels and enable shorter qualifications and lifelong learning. Moreover, we suggest that funding mechanisms should not work to support (not antagonise) flexibility for learners. This addresses the how and what but completely ignores why students enrol in tertiary education. Upskilling can include successful completion of one or two courses, which equates success for the student as they have achieved what they set out to achieve: their intention may never have been to complete a qualification. This though is reflected negatively for universities in retention rates (if the student only studied in one year) and qualification completion rates. The drivers for change and the measures designed to highlight performance of a tertiary institution need to be more aligned rather than working against the objectives of the draft strategy.

We suggest that government policies, objectives and funding systems need to be aligned so they are focused on achieving a common goal. For example, if government is focused on the economic growth agenda, they need to look broadly into what other government agencies are doing and funding to ensure that all systems are connected to ensure cohesiveness.

The system also needs to expand beyond a focus on school leavers and workforce needs to include opportunities for structured learning for older populations, micro-credentialling, and 'third age' learning. It should recognise and fund non-qualification outcomes that support employment and social mobility. Investment in student wellbeing, academic support, digital access and culturally responsive pedagogy is crucial, particularly for underserved groups. This includes expanding financial support for students from low-income backgrounds, mature students, part-time students and postgraduate students, and investing in digital infrastructure and inclusive design that also recognises and accommodates the complexities of neurodiverse learners. Along with this, significant investment is required in infrastructure, staff capability, and governance reviews to respond to AI, digital transformation, and lifelong learning demands.

There is a clear and evident need for major research funding investment to enable bolder research and attract and retain both domestic and international talent, as current national funding levels and opportunities cannot compete globally.

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

We agree with the focus of the priorities, but suggest more emphasis as follows:

- Social, cultural, and environmental outcomes as distinct elements, rather than as secondary benefits of economic growth.
- Equity and well-being that goes beyond simply improving achievement and access.
- Academic freedom and the 'critic and conscience of society' role of universities ought to be made more explicit, ensuring these are not overshadowed by the imperative for commercialisation and industry collaboration.
- Sustainability and climate resilience as tertiary education has a role in preparing society for environmental challenges and should reflect this in its strategic priorities.
- Student voice is missing from the TES entirely; the TES needs to show that the students are our partners and how we will address their needs, rather than centring the economy. It is unclear where student agency comes in.
- Explicitly outlining a need for foundational research that may not have immediate commercial outcomes yet is crucial for long-term knowledge advancement, especially given the emphasis on research commercialisation.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree
Comments	Achievement must be a priority in the TES, but the issue is how achievement will be measured. Upskilling by successfully completing one course may be considered as 'achievement' for a student, whereas the current measures indicate that qualification completion should be a students' end goal. Mature-aged students have more diverse motivations for engaging in tertiary than the typical university cohort. Some engage in tertiary education to grow their confidence, upskill, and gain experience around other commitments. The funding and performance systems do not enable flexibility for Massey University to easily deliver to our different cohorts' aspirations. There needs to be a consideration of students' intent versus how performance is measured, and the metrics must be sensitive to the changing demographics of learners, where there is an increasing proportion of part-time students.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	At present, there is insufficient detail provided to make a determinative comment on this question. There is, however, a risk of looking at student achievement through a single lens. From a wellbeing and student support point of view, the complexities of our student needs have increased significantly in recent years, and for providers, the challenge of supporting these students outside the student levy is becoming increasingly difficult. There is greater expectation in the draft TES that providers will bear even more costs and risks in providing services, and at a time when there are significant financial constraints due to chronic underfunding. New work comes at a cost, and it is not clear how policy reform and changes to the funding system will be aligned in achieving system-level goals. Statements such as '*Providers will be expected to ensure that courses and qualifications lead to real career opportunities by embedding labour market relevance into programme design and delivery, tracking employment outcomes of graduates, and strengthening connections with employers*' are problematic. This statement assumes

	that university graduates are not employable or that they struggle to find work post-study. It also does not recognise that many mature-aged students are already in employment. Nor does it realise that employment outcomes are strongly linked with the economy and changes in AI and automation, rather than in the control of the tertiary sector. More details are needed on what careers information and guidance will be provided by TEC to assist with this, what the expectations are, and how progress will be monitored.
Do you have suggestions for additional activities to support this priority?	Any metrics that are required must be consistently applied across the sector and cannot be costly or time-consuming to create. This is particularly the case where new data needs to be captured and reported via SDR, as this requires changes in Student Management Systems or SDR submissions, and these are often costly for providers. The draft TES does not refer to Study Link or other sources of financial support beyond the scope of providers' responsibilities that students need. For example, the draft TES refers to flexible learning, yet part-time students still cannot access student loans – this example highlights how student funding and provider performance systems are currently at odds with one another. We must address these tensions and dissonances through aligned public policy. It is important to also recognise non-qualification outcomes that support employment and social mobility.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	The objective's emphasis on economic growth and productivity is understandable given current funding pressures and national priorities. However, we caution against narrowing the purpose of tertiary (especially university) education to economic outcomes alone. As noted earlier, the strategy must also uphold the fundamental value of higher education — fostering critical thinking, civic engagement, and cultural enrichment. Moreover, research and discovery should not simply be pressed into service for economic productivity, but for its

	own sake, as a public good. Universities exist to deliver social, cultural and intellectual uplift, as well as advance economic wellbeing; in short, they serve a broader moral purpose, beyond reductionist, transactional and short-term objectives. Creativity is vital for innovation, but this is not recognized in the draft TES as priorities (and most likely will cascade to Investment Plan and funding priorities). Innovation comes from creativity and understanding human endeavors and needs. There is a danger in this draft of assuming that technology and science on their own will lead to innovation and economic growth; however, investment needs to be balanced across subjects and disciplines, especially to bring to bear a range of skills to solve complex problems in the twenty-first century. Many institutions lack the infrastructure and expertise for rapid commercialization. A new tertiary education strategy should acknowledge the time and resources required to build innovative ecosystems and avoid a 'one-size-fits-all' approach. One further point: the current draft considers employers as a homogenous group, and within Aotearoa New Zealand, this cannot be the case with the high number of small and medium sized enterprises. Some employers will want a broad range of skills, whereas in other employment areas the skills required may be much narrower in focus.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	It needs to be acknowledged in the TES that research commercialization as an income generation source is unpredictable. Universities exist for reasons beyond the growth agenda, and while commercialization and innovation bring ideas to impact and enable the translation of evidence-based research into 'real world' outcomes, this is but one area of a university's focus and responsibility. If the changes expected include '*an adaptable, creative workforce with critical thinking, communication, teamwork and problem-solving skills*', then do we need measures to reflect these attributes? The document sets very high expectations, but with a somewhat mono-dimensional monitoring approach that will not reflect progress toward meeting those expectations.

	For a user to initiate research, the user must be very skilled in knowing what the problem is and knowing where the potential solutions might lie. While this sounds simple, this skillset is rare, therefore there are concerns regarding this as an example of a contributing activity to economic impact and innovation priority.
Do you have suggestions for additional activities to support this priority?	The government could: • provide targeted funding for research translation and commercialisation. • continue to support cross-sector innovation hubs and incubators. • promote and fund interdisciplinary research that addresses national challenges.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree
Comments	This priority is highly aligned with the vision and purpose of Massey University: to serve all students in Aotearoa New Zealand (and beyond) who seek to learn and expand their horizons of knowledge for their benefit and the communities they will go on to serve. There is often an assumption that there is a linear and progressive transition from secondary to tertiary education; this is not the case. Learning needs are highly dynamic, and our policy and funding systems have not kept pace with the demand for lifelong learning. We note, too, the number of times that the word '*young people*' is used in the draft, and in reference to foundational education. Often when students leave secondary school, university or vocational learning is not a first choice, and many may take up this option later in life. This is shown in data that in some regions 50% of students are not engaging in tertiary study from high school. By narrowing the focus on *young people,* the strategy is limiting the scope for foundational education. There is, too, a trend of 'reverse articulation' where students move from university study to vocational education, and this is often at a greater rate than the linear model assumed here. We must recognise and

	encourage the interoperability of and mobility across and between the university and vocational education sectors, which is more complex than is presented here. As has been noted, it is important that performance metrics are aligned with the intent of the TES. This priority states "*The challenge is not only to widen access, but also to ensure that people can participate in ways that suit their life circumstances and work arrangements – through flexible study options and clear vocational pathways*". This statement does not mean qualification completion or retention if flexible study options are being promoted, therefore more appropriate metrics will be needed to measure this.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • **Disagree** • Strongly disagree
Comments	Access and participation in education can be out of the tertiary education sector's ability to influence. Do students have access to the right digital infrastructure and have reliable access to 'good enough' connectivity or any online connectivity at all. As of early 2025, approximately 3.8% of Aotearoa New Zealand 's population—around 199,000 people—did not have access to or use the internet. Those with no access tended to be older adults (over 75), people in social housing, people with disabilities, Māori and Pacific communities, people who live in rural or remote areas or those with lower income or education levels. Of further note, there are complexities and challenges in recognizing and supporting different ways of learning and the diversity across our sector. The draft TES assumes a single experience of how students learn; in short, there needs to be recognition that different learning needs and styles demand a variety of pedagogical and service-driven approaches. If we are to drive productivity gains and employment adaptability, then the system must be flexible and accommodating, not exclusionary. Clarity is required on key definitions, such as, for example, how to measure (or determine) low socioeconomic students. Any definition must be

	consistently applied across the sector and not for the institutions to determine themselves. There appears too to be an inconsistent use of lower socioeconomic groups and underrepresented groups, and it is unclear if this refers to the same group of students. Bit-sized and micro pieces of learning are popular with some students. However, from a services and support perspective, a micro credential generates less revenue yet still involves a person that needs support throughout their study. Perhaps it goes without saying that this comes at additional cost to the provider.
Do you have suggestions for additional activities to support this priority?	The government could expand financial support for students from low-income backgrounds and invest in better digital infrastructure and inclusive designs.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	Collaboration is essential and highly desirable, though it requires time, trust, and resourcing to work effectively. Universities are already exploring partnerships with iwi, industry, and research organisations. Universities also collaborate among themselves. If the funding settings are appropriated, some of the barriers for collaboration could be further reduced. The TES strategy must recognize the distinctive roles of different providers and avoid forcing uniform or homogenized models of collaboration. Finally, the concept of 'tertiary harmonisation' could be embraced across the system – respecting the autonomous spheres represented by the various tertiary education sub-sectors, and paying attention to their alignment and ability to support smooth credit transfer and student mobility - and this needs to be clearly defined to ensure shared understanding on what this means.
To what extent do you agree the expected changes and contributing activities will	• Strongly agree • Agree • Neutral

effectively support achievement of this priority.	• **Disagree** • Strongly disagree
Comments	Work integrated learning and industry-led project work come at a sizable cost to deliver and there is an assumption made that there are enough businesses to support (and be willing to support) work integrated learning, in all the possible forms it could take. To achieve this goal will be challenging for some stakeholder groups. The draft TES speaks to distinctive research strengths, followed by a contributing activity of "*Explore the distinct contribution of Mātauranga Māori to national and global challenges and scholarship* ". This is inconsistent with the current government funding directional shifts for research, which is taking it outside Mātauranga Māori. These contributions are absolutely leading and critical internationally and should be supported. At a government level, where are the support mechanisms to enable this and where is the investment going to come that supports the delivery of this research? Here there is a dissonance between the ambition of the draft TES and the current funding settings with which we are working. The reporting and monitoring currently outlined in the TES focus on elements of 'more' (e.g., growth in cross-sector education, research and workforce partnerships) but not on the 'quality' of what is being delivered. For research, the key success measures require much more detail. For example, how will 'research uptake by industry' be measured? While other suggestions are made such as system measures to better reflect relevance and impact and 'provider-level measures of innovation activity and workforce relevance', how and when will these be developed and what role will universities have in this?
Do you have suggestions for additional activities to support this priority?	Government could support place-based partnerships with iwi and communities and continue to build credit transfer and co-delivery models across institutions.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	While supporting growth, the ambition to double international education export revenue must not compromise quality and, it needs to be underscored, this

	reliance creates significant risk for the entire tertiary sector (and individual institutions in particular) and put the social license of universities at risk, as seen in other countries. The heavy push to double the value of international education by 2034 means that Aotearoa New Zealand will be ever more reliant on international student fee income, and this is a major risk that needs mitigation. That, alongside no limits on numbers of providers, creates a push to have more providers resulting in increased internal competition, alongside significant risk exposure across the board. This exposes Aotearoa New Zealand to the kind of education failures that happened in the 1990s, early 2000s. At that time, these system failures included intensified competition, herding into high demand markets rather than directing them into genuine skills gaps, weak quality assurance systems and blurring of provider distinctions. What mechanisms are intended to be in place to prevent the repeat of the same problems, especially when the government is focused on the market to address issues rather than direct interventions? Aotearoa New Zealand is a relatively expensive country in which to live and study, with the cost of living being higher than in Australia and other competitor systems, and in the absence of specific measures to address that (including, for example, subsidised accommodation) this may deter international students from coming here. The reality is this priority is making Aotearoa New Zealand highly reliant on the international student revenue to make up for the current underfunding of the tertiary sector. The wording around this priority needs to change as it risks positioning international students as a financial commodity; rather, we should be focussing on the benefits that will accrue to international students in studying in Aotearoa New Zealand and the advantages for domestic students in "internationalising" the learning experience. International postgraduate research students are vital for building research capacity and capability. More detail is required on what the implementation of an improved agent network model would look like.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	Investment in international student support and wellbeing is essential as there can be additional complexities to support international students.

Do you have suggestions for additional activities to support this priority?	Immigration settings, the student experience and global brand positioning must be aligned, and institutions need support to diversify markets and delivery models. Visa restrictions can work counter to this priority. For example, encouraging international PhD students to remain in Aotearoa New Zealand at the conclusion of their formal study can be very beneficial for the country. We currently have a pipeline model in Aotearoa New Zealand where we do not have the settings right to be able to retain international PhD students into funded Post Doctoral roles, and to enable them to apply those skills they have developed within an industry setting. As Post Doctoral positions are treated as staff, most universities cannot afford to employ them. These are valuable skills that Aotearoa New Zealand has invested in, and these skills risk being lost by exporting the 'value add' that has just been created.

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	There needs to be a sharper focus on the roles, expectations and purpose of each part of the tertiary sector outlined here. There is a clear tension in this section where the draft strategy states that it does not override the autonomy and the broader statutory missions and responsibilities of public tertiary education organisations, yet it notes that providers seeking TEC funding are expected to show how their plans will align with the TES. Please address this contradiction.
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	Government agencies (such as the TEC, Ministry of Education and MSD) need to clarify their roles and provide support, such as supporting careers information and guidance and MSD's role in supporting access to tertiary study. Massey University would like to suggest that existing government data (e.g., IDI for employment) be better utilised. TEC should develop nuanced provider-level indicators that reflect context and mission. Consideration should be given to a national admissions centre for all tertiary education and a better national body for tertiary

	data (such as the UK HESA) to monitor student numbers, achievement, progress, and employment trends. Government should also anticipate strategic training needs and incentivise providers to respond to workforce and global challenges.
Other (please specify)	

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

Overall, the proposed monitoring framework indicates a clear intention to track progress against the TES priorities. The identified 'opportunities to strengthen measures' suggest an awareness that the current system needs to evolve to capture the nuances of the draft strategy's ambitions, particularly regarding qualitative outcomes, the 'distance travelled' metric and the broader impact of collaboration and international education. For all providers, reporting on additional and new measures will come at a greater compliance and cost to those providers. Massey University appreciates there needs to be some assurance at a system-level that individual providers are delivering on their plans and making a difference for students and to society at large; but the focus must be on *what* is being delivered, rather than measurement for its own sake. To be clear: at a time of fiscal constraint, it seems more sensible and possibly more prudent to prioritise a much smaller set of indicators to show system-level performance or leave it up to individual TEOs to select a small range of indicators that are most relevant to them. The bottom line is that monitoring outcomes must go beyond quantitative metrics to include qualitative indicators such as student wellbeing, stakeholder satisfaction, and societal impact.

There is strong support for the 'value added' or 'distance travelled' metric *in lieu of* current Educational Performance Indicators (EPIs), but its methodology must remain simple to avoid generating substantive reporting costs. We note that Massey University has been making the case for a 'distance travelled' methodology for some years and we applaud the intention here; however, we make the plea that this should not be overly complex to administer and that, in this regard, we can learn from other jurisdictions.

The draft TES states, "*There is also value in recognising outcomes that support employment but do not result in a formal qualification*". Massey University strongly supports this statement. For some students, the completion of one or more courses could achieve their desired needs/purpose in studying and/or upskilling and here 'success' is achieved for this student without the completion of a qualification. We note that, a system level, qualification completion is an important driver for students. However, the current funding system necessitates and incentivises enrolling students in qualifications and there exist very few viable options for TEOs to offer smaller, bite-sized chunks of learning that are designed to meet student needs and for these 'products' to be a reliable revenue source.

Employment metrics can be misleading, especially in tight job markets as Aotearoa New Zealand is currently experiencing. Often, as in the case of Massey University and most likely other universities in the future, students are often in employment while they study as they upskill their knowledge. Employment rates for new graduates may be lower than normal for reasons that sit outside the tertiary sector, but that does not remove the value of the education received or the 'distance travelled', but rather a sign of the times. The metric relating to graduate income and post-graduation outcome earnings does not consider inequities across industries.

Relating to the key success measure 'Stronger employment and innovation outcomes, as measured by graduate earnings, skills relevance, and research uptake by industry', the measurement of research uptake by industry is likely to be complex and require a proxy measure, but is also only one part of the picture. Given the draft strategy outcomes being sought, the investment by industry should also be increasing, not just in how much funding invested in research and development, but also in skills development. This is not specifically referring to research degree completions; it speaks to the investment in ongoing skills development. Consequently, a metric capturing how many staff are being supported by employers to partake in university-based courses would also be expected to increase over time as well as provide valuable information about what courses are begin taken up by students and how they align (or not) with industry-identified needs.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

The draft TES needs to consider the current systems operating environment relative to where the strategy wants the tertiary sector to go, and whether a five-year timeframe is realistic considering the absence critical funding systems, or recognition that todays' funding systems work in opposition in many instances on what the draft TES is wanting the tertiary sector to achieve. A vision for the sector and the future would help galvanise efforts, projecting forward to anticipate skills shortages and research and education needs. For example, the Australian Universities Accord proposed that 80 percent of the working age population should have a tertiary qualification by 2050 (up from 60 per cent currently). In short, we need to 'think forward', work to specific goals and targets, and engage in a similar type of courageous thinking.

The explicit deficit positioning of Māori, Pacific and disabled peoples is deeply problematic in the draft TES. The problems referred to on p.5, such as declining participation rates in formal education and the loss of faith in the current education system will continue if Māori and Pacific peoples continue to be positioned as 'other' to these systems; our systems need to be more inclusive and celebrate diversity, not exacerbate existing disparities There is a need to integrate culturally-based programs of study, te ao Māori, and tikanga into innovation and economic impact priorities, as these are often overlooked.

Finally, it is important that any new TES creates and fosters a system that can be sustained in the long-term. The drive to double international students puts Aotearoa New Zealand at risk of several shocks internationally. It could appear that the drive to increase international students is there to offset the *fiscal restraints* driver for change, with the risk that international students appear as a financial commodity rather than as a student who can positively and productively contribute to the wider education experience here in Aotearoa New Zealand.

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Te Kāwanatanga o Aotearoa
New Zealand Government

MATAURANGA IWI LEADERS GROUP

To:	Katrina Sutich - General Manager, Tertiary Education Commission (TEC)
From:	9(2)(a) Mātauranga Iwi Leaders Group (MILG)
Re:	MILG response to Draft Tertiary Education Strategy targeted sector consultation

Introduction

Mātauranga Iwi Leaders Group (MILG) are mandated by the 83-iwi represented in the National Iwi Chairs Forum and work on their behalf in the education sector to advance educational outcomes for ākonga Māori.

Summary of position

MILG would like to acknowledge the authors in drafting a thoroughly considered response to the consultations on the TES to date. We have read extensively through the draft targeted sector consultation document, the Cabinet papers, the plan on a page, as well as early consultation documents but our response will be brief. MILG is supportive of the priorities of the new strategy, in particular increasing access and participation, deepening integration and collaboration between tertiary providers, communities, and industries, and lifting achievement. We look forward to continuing our work with TEC and seeing this strategy successfully delivered upon.

1. MILG is supportive of the priorities of the new strategy, in particular increasing access and participation, deepening integration and collaboration between tertiary providers, communities, and industries, and lifting achievement.
2. MILG supports the TES responding to the needs of the local businesses, industries and communities, through enabling equitable access, provision and funding systems within the tertiary education system.

Do you have suggestions for additional activities to support the priorities?

Priority 2 - Economic Impact and Innovation:

- Building upon contributing activities on page 11 of the document, *"Secure and maintain linkages and bridges between the tertiary education sector and the Māori economy, including through promoting relevant areas of study and research activity"* and *"… iwi input into programme design and delivery – particularly for vocational and career-focused learning"*, MILG would like to see the tertiary education system partnering with iwi to invest in and develop iwi-led education initiatives that builds capability and serves the education and skill needs of the iwi.
- Climate-impacted industries like agriculture, forestry and fishing remain amongst the top industries in the Māori economy. What consideration will the TES give to the demand for innovation via green skills/high-value green career pathways in these industries?

Key Contact Information

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Submission on the Government's draft Tertiary Education Strategy

From: Executive Leadership of Manukau Institute of Technology and Unitec
Submitted: 30 September 2025
Submitted to: tertiary.strategy@education.govt.nz

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Recommendation 11. That ISBs be relocated in the Tertiary Education Strategy under Government Agency Roles, to more accurately reflect their status and to thereby help focus attention on the need for these Government Agencies to work in harmony, avoiding duplication and excessive burden on the sector. 7

Introduction

Thank you for this opportunity to comment on the draft Tertiary Education Strategy. We see this as an important document that can provide clear direction for the next five years.

This submission is from Unitec and Manukau Institute of Technology's (MIT) Executive Leadership. MIT and Unitec deliver to about 20,000 learners, primarily in Tāmaki Makaurau, across a range of industry and disciplinary areas, NZQCF levels, and modalities.

1 Priority 1: Achievement

1.1 Distance travelled

We strongly support the notion that there are benefits to individuals and to society in tertiary education even without qualification completion. We agree with the statement: "Completion metrics alone can mask progress made by students and trainees from disadvantaged backgrounds. Measuring how far a learner progresses from their starting point can provide a fairer and more informative view of provider performance."

However, we caution against transferring all of this responsibility on to providers. Specifically, the mechanism for determining this ought to be more sophisticated than, for example, a survey of tertiary learner leavers, which could be expensive and highly unreliable.

At ConCOVE Tūhura last month, the Jobs and Skills Australia Commissioner Professor Barney Glover AO said that analyses done by JSA show that having a VET qualification leads to 16% greater employability, $16k median salary boost and 40% reduction in income support. Even not completing a whole VET qual yields benefits. New Zealand needs similar analyses (perhaps done by Stats NZ drawing upon the Integrated Data Infrastructure?), to inform policy.

Recommendation 1. *That the Government instructs Stats NZ to undertake empirical analyses of the social benefits of any tertiary education and uses this to inform public policy.*

1.2 Work-based learning

We are supportive of work-based learning. However, within generic statements about increasingly moving away from other modalities towards work-based learning there is an untested assumption that WBL is applicable to all areas delivered through the VET sector and will lead to better outcomes. We are not aware of research that proves this to be the case evenly across all areas/industries/disciplines. We suggest that a measure of caution in asserting the singular importance of work-based learning is appropriate, and recommend a blended approach tailored to each different area of learning and work.

2 Priority 2: Economic Impact Achievement

We are broadly supportive of this area. However, as with the current and proposed reforms of the science system we are concerned that the contribution that the VET sector can play is again largely under-recognised.

2.1 The role of ITPs in Applied Research

This section appears to be of the view that research (including user-initiated research), knowledge transfer and research commercialisation occur solely in the domain of universities. This is evident in such passages as: "Promote knowledge transfer to benefit the economy and society, with universities connecting businesses and communities to global advances in knowledge/technology."

In practice, the vocational education and training sector has significant knowledge exchange and applied research relationships with a wide range of employers and industry organisations. The Government should acknowledge and not waste this capability and capacity.

2.2 ISBs and Universities

The separation of vocational and higher education at degree level is historically arbitrary. Over time, learning outcomes delivered through VET providers have increasingly – and out of necessity – built in critical thinking capabilities; learning outcomes delivered through higher education providers have increasingly – and out of necessity – built in practical skills. One would be hard-pressed to justify significant differences at NZQA Levels 5-7 (and arguably 8-10 regarding applied research and professional practice) other than those we have perpetuated through structures.

Bachelor Degrees include courses at levels 5, 6 and 7. Many Bachelor degrees are offered at universities and polytechnics. However, ISBs only have authority in relation to Levels 5 and 6 when they are delivered through the VET sector.

It is wasteful that the Government should invest in industry voices through ISBs, yet not provide for these voices to then influence all tertiary education that contributes to the development of their workforce. The vast majority of university graduates move into the workforce – not merely into postgraduate study and then research roles.

This is effectively acknowledged later in the TES: "In higher education, especially universities, integration should improve the educational experience through greater engagement with employers in the design and delivery of learning, including through work-integrated learning and industry-led project work. These partnerships help ensure that graduates are equipped with the skills and experience required in modern workplaces." (p15 para 2).

Recommendation 2. *That ISBs set industry standards that apply to ALL level 1 to 6 tertiary education.*

3 Priority 3: Access and Participation

We are broadly supportive of this Area and are encouraged to see a renewed commitment to improving outcomes for Māori, Pacific and Disabled people.

3.1 Growth and Innovation

We agree with the goal to: "Enable access to education and training for people from all backgrounds and regions, ensuring more people build relevant skills that contribute to a productive economy." However, we note that for the first time in a long time, MIT and Unitec

run the risk of having to turn away demand because of caps on government funding and, in fact, financial penalties if we exceed the caps by too much.

This inhibits public VET providers from adjusting to the access and participation demands of the marked.

Instead, we note an expanding number of Private Training Establishments, which consume public funding. We do not object to PTEs, which play an important role in the sector – especially if they are located in regions that are otherwise underserved.

However, capping the opportunity for public VET providers to grow, while at the same time approving new PTEs, effectively forces learners to increasingly choose PTEs (even through there is no assurance that the quality will be superior). It also constrains public providers from achieving the type of scale that can ensure viability and also provide a sufficient financial return to be invested in innovation. This latter is particularly important in the absence of public innovation grants schemes (such as the TEC's Accelerating Learner Success Fund, which has been stopped, or similar funds in Australia such as Higher Education Participation and Partnerships Program, Structural Adjustment Fund of Fee-Free TAFE).

3.2 Modality

The notion that online, on-campus and in-work modalities are inherently different and separate is outdated and unhelpful. In practice, almost all tertiary education takes place through utilising a range of modalities, including online engagement, in-work learning and on-campus where required (e.g. for access to specialised resources) or preferred (e.g. for learners who require greater support).

Recommendation 3. *That funding mechanisms should be based upon an integrated modality, rather than incentivising providers to be bound by a single mode of delivery.*

4 Priority 2: Integration and Collaboration

We are broadly supportive of this area.

Recommendation 4. *That examples of contributing activities includes the many instances in which universities and VET providers collaborate in research projects, particularly with a view to leveraging polytechnic's applied research relationships with communities and industries.*

5 Priority 2: International Education

We are broadly supportive of this area. In particular, we commend the Government on the Going for Growth Plan and its intention to better market New Zealand as a favoured destination for international learners.

5.1 Regionality

The TES tasks Polytechnics with being regionally focused. To that end, we support incentives that bring international students into under-served regions with higher skilled workforce

requirements. However, if such incentives are put in place the Government should ensure that those international students do in fact study and reside in those regions, and are not merely taught by regional Providers but out of satellite campuses in major cities (such as campuses in Queen Street Auckland).

Recommendation 5. *That any incentives for attracting international students to regions under-served by skilled workforces are attached to auditable requirements that those learners live and study in those regions.*

5.2 Agents

Our extensive experience of working with a range of agents shows that it is essential to have a range of levers in attracting, incentivising and managing these relationships. While we agree that there are some Tertiary Providers that work with agents on, essentially, a race to the bottom we do not agree that standardising engagement is the solution. Rather, there should be regulation that limits excessive behaviours that put at risk the quality of education (for example, through setting such high agent commission rates that the remaining funds compromise the quality of education, thereby impacting the reputation of New Zealand as an attractive destination for international learners).

Recommendation 6. *That mechanisms are established for regulating provider-agent relationships that put the New Zealand education market at unacceptable risk.*

5.3 English Language

The Government, through NZQA, has determined minimum English language proficiency requirements for entry into various levels and programmes of study. For the VET sector, assessments must be done prior to admission into each new programme, whereas a university may determine that completion of a lower level programme in New Zealand is sufficient to determine that English language proficiency requirements for the higher-level programme are met. It would be helpful if this same approach could be applied to the VET sector, streamlining learner progression and enabling package offers (e.g. from a Diploma into a Bachelor degree).

Recommendation 7. *That English language proficiency requirements give greater recognition to proficiency acquired through undertaking programmes of study in New Zealand.*

5.4 Visas

In order to ensure that we provide a more coordinated approach to international markets, it will be important for Immigration New Zealand to be more transparent in its reasoning for rejecting Visa applications. Typically, visa approval rates for learners from the same markets are significantly higher for university applicants than for VET applicants. We are aware of numerous cases of VET applicants being rejected and then applying for entry into universities and being approved.

In the absence of clear understanding of variations in visa rejection rates across the tertiary sector, based upon periodic independent reviews, it is difficult to commit to a coordinated, integrated approach to the international market.

Recommendation 8. *That Immigration NZ provide detailed and timely transparency on its visa decline decisions in order for providers to improve their recruitment processes.*

Recommendation 9. *That the visa approval decisions by Immigration NZ be audited annually for consistency and fairness, with comparisons of thematic analyses by provider type being made public.*

6 Delivering the Strategy

6.1 Provider Roles and Expectations

Most provider types are described in terms of their mandate (universities "must integrate…"; Wānanga have a "mandate"; Polytechnics "will be expected to…"). PTEs, on the other hand, are described as: "often highly responsive to learner, employer, and community needs." This is a positive evaluative statement, which is not attributed to other provider types although it could be similarly applied to them. This suggests a bias that may be deemed inappropriate.

Recommendation 10. *That the Government avoid using evaluative language in the Tertiary Education Strategy in its differentiation of types of providers.*

6.2 Government Agency Roles

We note that ISBs are listed under Provider Roles and Expectations rather than Government Agency Roles. This may be because they have a temporary duty to accommodate WBL Divisions, however their primary purpose is to set standards, not to be a provider.

Recommendation 11. *That ISBs be relocated in the Tertiary Education Strategy under Government Agency Roles, to more accurately reflect their status and to thereby help focus attention on the need for these Government Agencies to work in harmony, avoiding duplication and excessive burden on the sector.*

SUBMISSION ON THE DRAFT TERTIARY EDUCATION STRATEGY (TES) 2023–2034

MITO –Te Pūkenga Business Division

Organisation:
MITO – Te Pūkenga Business Division

Category:
A division of Te Pūkenga

Contact for Official Information Act (OIA) purposes:
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Request to withhold information:
No

This submission is provided by MITO—a business division within Te Pūkenga with extensive experience managing vocational education, national apprenticeships, and industry training. MITO brings practical insights on what drives learner success, employer engagement, and system responsiveness. The perspectives offered here reflect direct involvement with learners, employers, industry, and education providers across multiple industries and regions, ensuring relevance and operational grounding in this consultation.

1. Objective and drivers for change

Question: Do you have any comments on the draft objective for tertiary education?

MITO's response:

The draft objective appropriately recognises the central role of tertiary education in equipping learners for success and contributing to New Zealand's social and economic wellbeing. However, to better support long-term economic growth and productivity, the objective would benefit from clearer emphasis on sustainable employment outcomes—recognising that qualifications must translate into meaningful careers, not just jobs, with opportunities for progression and resilience to change.

Description:

In today's rapidly evolving labour market, skills and knowledge quickly become outdated, making lifelong learning and adaptability essential. This is largely being driven by advancing technologies, shifting industries, and global trends. The tertiary education system must therefore produce graduates who are not only technically competent but also equipped with core capabilities such as critical thinking, adaptability, resilience, initiative, communication, problem-solving, and interpersonal skills valued by employers. Embedding these capabilities within the objective will help signal the system's commitment to producing work-ready graduates who will contribute to the economy beyond initial employment. Furthermore, acknowledging the diverse pathways learners take—including work-based and hybrid learning—will better reflect the complexity of modern education and work transitions. The tertiary system must therefore be designed to deliver graduates who can navigate change, take on higher-level roles over time, and contribute meaningfully to the economy.

The strategy should acknowledge and support the full range of learning pathways available today—including academic programmes, apprenticeships, work-based learning, blended models, and micro-credentials. This reflects the reality that learning is no longer linear, with many individuals moving between education and employment throughout their lives. Embedding this diversity into the strategy's objectives positions the purpose of the system and reinforce its commitment to lifelong learning, relevance, and real-world outcomes.

Currently, the strategy does not sufficiently articulate a vision for industry training, which previously held a more defined position prior to reforms in the vocational education and training system. Without stronger emphasis, there is a risk that school leavers—and those who influence their decisions, such as families, whānau, and career advisors—may perceive certain pathways as more valued or prestigious by default. To address this, it is important that all high-quality pathways are presented with equal focus: those that lead directly to employment with integrated, on-the-job tertiary learning, and those that involve full-time study before entering the workforce. What matters most is that every learner is supported to choose the option that best aligns with their goals, and that each pathway is positioned as a credible, sustainable route to a fulfilling career.

The benefits of each pathway should be clearly communicated—not only to learners, but also to their families, communities, and others supporting their decision-making—so they can feel proud of the choices being made and confident in the long-term outcomes. This includes recognising that learners in industry training are often immediate contributors to the economy—earning an income, paying tax, and contributing to retirement savings through KiwiSaver from the outset of their careers. These contributions are significant, and the system should do more to reflect and promote the value of these pathways accordingly.

Ensuring learners receive the right support, encouragement, and guidance requires a whole-of-system approach, underpinned by greater public understanding of the full spectrum of options. Ultimately, all learners—regardless of their pathway—are preparing to contribute to the workforce, and employers are the beneficiaries of this talent, whether it arrives via full-time study or through direct entry into employment-based learning.

Question: Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

MITO's response:

The draft identifies key drivers such as technological advancements, globalisation, demographic shifts, and changing learner expectations. Responding effectively requires a flexible, agile system that can adapt curricula, delivery models, and credentialing approaches to meet evolving demands.

Description:

The workforce of tomorrow will require a blend of technical skills and soft skills, with a strong emphasis on adaptability to navigate frequent changes in industry needs. The tertiary system must therefore foster lifelong learning habits and provide multiple entry and exit points, supporting learners to upskill or reskill as needed. Additionally, fiscal pressures necessitate prioritising investments in programmes that deliver strong labour market outcomes and economic value.

Equity remains paramount—addressing systemic barriers for women, Māori, Pasifika, disabled learners, and those from lower socio-economic backgrounds must be integral to system design, with targeted support and monitoring. System design must also consciously integrate and hardwire an expectation that learner success is a priority with a special focus on addressing inequities, ensuring that demographic and socio-economic differences do not limit participation or success.

2. TES priorities: Do you think there should be any additional or different priorities?

MITO's response:

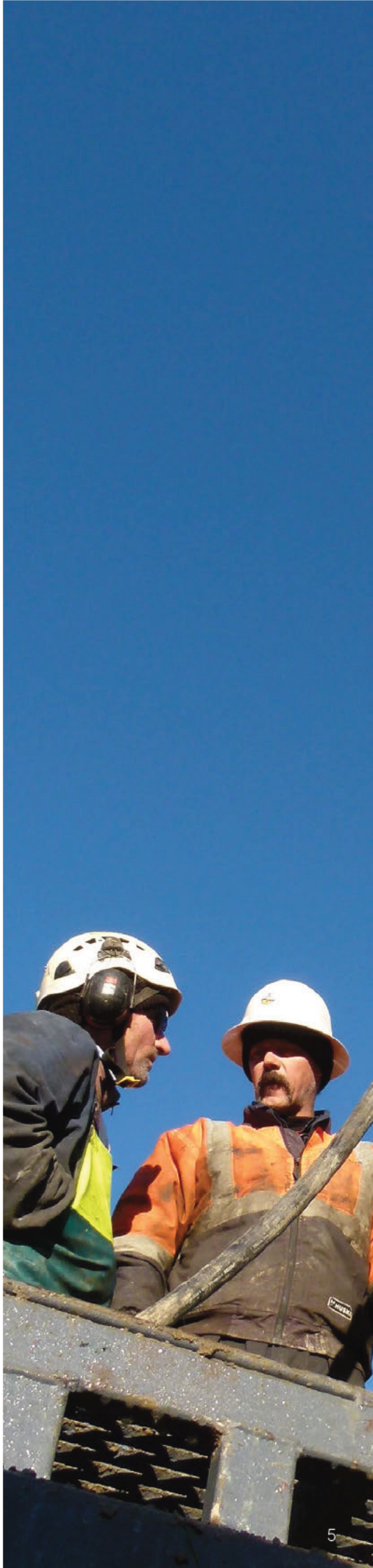
We support the five priorities outlined in the draft TES. However, to ensure effective delivery and meaningful system change, we recommend sharper emphasis in three areas:

1. Stronger alignment between funding and TES priorities
2. Expanded support for career exploration and transitions
3. Refined and consistent success metrics beyond qualification completion rates.

Description:

The effectiveness of the TES will ultimately be determined by its translation into real outcomes—requiring clear alignment between the priorities and the way funding is allocated, reported on, and evaluated. Public funding should reward outcomes that matter—sustainable employment, learner progression, equity improvements, and responsiveness to industry demand.

Secondly, learners are often expected to navigate a highly complex system with limited structured support. Expanding investment in career exploration, transitions, and prequalification pathways (such as taster programmes, micro-credentials, and bridging options) will allow learners to make better-informed decisions and reduce mismatches between training and labour market needs. Strategic alignment between public funding and TES priorities is crucial for maximising system effectiveness. Traditional measures such as qualification completions fail to capture the full picture of learner progress, particularly for those facing barriers. Relying solely on qualification completions overlooks the shades of learner progress—metrics such as employment outcomes, skill utilisation, learner satisfaction, and "distance travelled" (tracking learner progress relative to their starting point) provide a more holistic view. These metrics capture learner growth, particularly for those overcoming barriers or pursuing non-traditional pathways, ensuring the system supports all learners effectively.



3. Feedback on individual priorities

Priority 1: Achievement

- Agreement: Strongly agree.
- Explanation: The focus on learner completion, retention, and value-added outcomes is essential to raising educational attainment and relevance.
- Suggestions:
  - Graduate outcomes
  - Employer/industry satisfaction
  - Performance of learners including those from underserved backgrounds will help close equity gaps.

Description:

Achievement encompasses not just finishing a qualification but ensuring learners gain the skills and knowledge needed for successful employment and progression. This requires healthy support through the learning journey, especially during the critical early stages when learners are most vulnerable to disengagement or interruption, to help ensure sustained participation and progression. Systematic collection and transparent reporting of graduate outcomes and satisfaction provide critical feedback loops for continuous improvement. Proactive equity-focused measures are necessary to create inclusive environments where all learners can thrive, helping to address historical disparities.

Priority 2: Economic impact and innovation

- Agreement: Strongly agree.
- Explanation: Employer engagement through Industry Skills Boards (ISBs) is vital for aligning training with workforce needs and fostering innovation.
- Suggestions:
  - ISBs need adequate resources to influence quality outcomes for the industries they serve.
  - Innovation metrics should extend to commercial impact and industry uptake.

Description:

Economic impact through workforce productivity is a key rationale for public investment in tertiary education. Close collaboration between education providers, ISBs, industry, and employers ensures that skills provision remains relevant and that innovation flourishes within the economy. This requires ISBs to have not only an advisory role but active influence, supported by adequate funding and governance structures. Measuring innovation should go beyond academic outputs to include tangible benefits such as new products, services, and business growth, thereby reinforcing the contribution of tertiary education to economic dynamism—showcasing and measuring how the tertiary education system is supporting a productive economy.

Priority 3: Access and participation

- Agreement: Strongly agree.
- Explanation: Proactively addressing barriers to participation is fundamental to equitable outcomes.
- Suggestions:
  - Increase financial, geographic, and cultural access through diverse delivery options and support models.
  - Strengthen career guidance and foundational education.

Description:

Access is not merely about enrolment numbers but about enabling diverse learners—including those from rural, low-income, and minority backgrounds—to fully participate and succeed. Flexible delivery models such as online learning and regionalised access will overcome geographic barriers, while financial support and earn-while-you-learn models mitigate economic constraints. Clear pathways and quality career advice are crucial for learners to make informed choices, reducing drop-out and underemployment. Foundational programmes bridge gaps in prior learning, preparing learners to succeed in vocational or academic streams.

Priority 4: Integration and collaboration

Agreement: Strongly agree.

- Explanation: Deepening collaboration among providers, employers, iwi, and communities enhances system efficiency and relevance.
- Suggestions:
    - Credit transfer mechanisms should be expanded across the system.

Description:

Fragmentation in the tertiary system undermines learner experiences and economic outcomes. Establishing formal, outcome-focused partnerships enables resource sharing, reduces duplication, and smoothes learner transitions between providers and sectors. Involving Māori and iwi partners in governance and decision-making ensures the system honours Te Tiriti obligations and delivers culturally responsive education. Aligning research and teaching more closely with industry needs strengthens the contribution to innovation and workforce development.

Priority 5: International education

Agreement: Agree.

- Explanation: International education is important but must align with domestic workforce and innovation priorities.
- Suggestions:
    - Growth should be carefully managed; focus on quality, cultural safety, and workforce contributions.
    - Flexible delivery and strong support services should be enhanced.

Description:

International students bring diversity, revenue, and global connections that benefit the tertiary education system and economy. However, growth should be balanced with maintaining education quality and ensuring international graduates contribute meaningfully to New Zealand. Offering hybrid and digital learning increases accessibility and relevance, especially in a globalised education market.

4. Roles and expectations for different system parts

Question: Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering on the TES?

MITO's response:

MITO supports the need for clear and coordinated roles across the tertiary education system to ensure alignment with the TES priorities. In particular, we support a strong, enduring role for employers and industry through ISBs, and a delivery system that values diverse provider contributions—including business divisions like MITO, private training establishments (PTEs), wānanga, and polytechnics.

However, we recommend that the TES more explicitly reflect the direction that has been publicly outlined by Government in relation to vocational education reform. In our view, some of the language in the consultation document may inadvertently suggest a structural outcome that was not part of the original reform intent—particularly regarding the future of work-based learning (WBL).

Clarifying the transition role of ISBs and the future of work-based learning

The consultation document includes the following statements:

- "Industry Skills Boards will also temporarily manage the work-based training currently managed by Te Pūkenga as required during the transition to both this new industry training system and the re-establishment of a network of regionally governed polytechnics." — Tertiary Education Commission
- "During 2026 and 2027, the work-based learning functions will move out of ISBs into polytechnics, wānanga and PTEs." — Ministry of Education
- "ISBs, which are temporarily managing work-based training provision during the transition from Te Pūkenga to a network of regional polytechnics supported by a federation structure, are expected to contribute to this TES in the same manner as other organisations managing work-based training." — Ministry of Education

While the consultation document acknowledges this transitional arrangement, it is important to note that Government announcements regarding apprenticeship and industry training reforms emphasise a stronger role for industry leadership over the provision network. This direction seeks to ensure that vocational education remains responsive, agile, and tightly aligned to New Zealand industry and workforce needs.

The TES should clearly reflect these commitments to avoid unintended consequences—such as diminished industry confidence or disengagement—which would directly affect system performance and relevance. ISBs must be sufficiently empowered and resourced during the transition to ensure quality and relevance in programme design and delivery. At the same time, providers need clear guidance on their future roles and responsibilities, so they can plan and invest accordingly. This clarity supports system stability, learner confidence, and sustained employer engagement.

Recommendations for the TES

To support strategic clarity and alignment, we recommend that the TES:

- **Acknowledge the interim role** of ISBs in overseeing work-based learning during the transition period, providing industry with the necessary time and space to determine the most effective structures and approaches for facilitating and supporting on-the-job training;
- **Avoids foreclosing on** a predetermined structural outcome in which WBL delivery is solely housed within a network of polytechnics supported by a Federation;
- **Reaffirm the long-term role of diverse providers,** including business divisions like MITO and PTEs, in delivering work-based education;
- **Reflect Government's stated intent** to centre employer and industry leadership in the vocational education and training system;

- Emphasise the need for l**earner and employer choice** in delivery models that are accessible, high quality, and aligned to industry needs.

5. Monitoring progress and indicators

Question: Do you have any comments on the proposed approach to monitoring progress? Suggestions for additional indicators?

MITO's response:

The monitoring framework's layered approach—combining outcomes, intermediate metrics, and outputs—is appropriate and necessary for effective oversight.

Description:

To capture the system's true performance, indicators should include employment outcomes (job placement, retention, income progression), learner satisfaction, and skill utilisation. Disaggregating data by demographic and delivery mode identifies gaps and informs targeted interventions. Including distance-travelled metrics offers a fairer measure of success, especially for learners overcoming barriers. Transparent, provider-level reporting empowers learners, employers, and communities to make informed choices. Establishing performance levers and accountability measures for underperforming providers drives continuous improvement and safeguards public investment.

6. Final comments

Question: Do you have any other comments on the draft TES?

MITO's response:

The TES sets a strong strategic direction but must be supported by clear implementation, funding, and accountability to realise its potential for improving New Zealand's productivity and economic wellbeing.

Description:

For the TES to transition from policy to impact, it must provide sector participants with certainty around funding, roles, and performance expectations. Embedding flexibility, learner-centred approaches, employer engagement, and equity into system design and operation will ensure that the TES's priorities translate into meaningful outcomes. Ultimately, a well-functioning tertiary education system is foundational to New Zealand's future prosperity, enabling all learners to contribute fully to a thriving economy and society.

Feedback on the Draft Tertiary Education Strategy to the Ministry of Education

September 2025

This submission is from:

Motor Trade Association (MTA)

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Kind regards,

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1. About MTA

The Motor Trade Association (Inc) (MTA), established in 1917, has earned and maintained the trust of New Zealand's motoring community for over a century. As the peak body for the nation's automotive industry, MTA represents more than 4,000 businesses that keep New Zealand moving – from repairing, fuelling, and inspecting vehicles to buying, selling, and importing them. Our members span general and specialist automotive repair (heavy and light vehicles), collision repair, service stations, parts and accessories, auto electrical, vehicle importers and dealers, inspection services, and vehicle recovery. As such, our members are heavily involved in on-job industry training. Collectively, the automotive industry employs over 60,000 New Zealanders and contributes around $6.4 billion to the economy. Recognised as an authority on industry matters, MTA is committed to helping families, businesses, and communities travel and connect safely.

2. Introduction

MTA welcomes the opportunity to provide feedback on the Tertiary Education Strategy consultation. As the national body representing the automotive industry, we are committed to ensuring that New Zealand's tertiary education system produces graduates who are work-ready, adaptable, and equipped to contribute meaningfully to a dynamic and technologically evolving industry.

Our submission emphasises that employer-led, work-based learning is central to achieving the TES priorities. Secondary-to-tertiary pathways, regional alignment, responsiveness to technological change, and stronger integration between providers, employers, communities, industry stakeholders, iwi, and research organisations are all critical to delivering meaningful outcomes for learners, industry, and the wider economy.

3. Priority 1 – Achievement

MTA supports the inclusion of achievement as a TES priority. For the automotive industry, achievement must go beyond enrolment, course completion, or ethnicity alone. It must reflect the development of learners who are genuinely work-ready and who progress into employment within their chosen field of study.

The automotive industry is undergoing unprecedented change, driven by technology. This requires a broad skill set that spans traditional petrol vehicles, the new generation of electric and hybrid vehicles, and the integration of digital tools and artificial intelligence in a rapidly evolving sector.

While higher completion rates are important, they do not on their own reflect the true impact of tertiary education. Formal qualifications matter, but it is equally critical that learners can demonstrate their skills and build meaningful careers within the industry. Too often, full-time automotive courses focus on certificates rather than ensuring graduates transition into real employment. For learners with lower prior achievement or from under-served groups, success should be measured not only by qualification completion but also by their progress into meaningful employment, the capabilities they develop, and ultimately their ability to secure and sustain work in the sector. Work-based learning supports this by enabling learners to earn while they learn, avoid student debt, and develop real-world competencies that contribute to an employer's productivity from day one.

Currently, achievement in the automotive industry is assessed through two measures: course-based or unit standard approaches. However, the technical complexity of automotive work, with its wide range of makes and models, means that having two separate, non-integrated systems creates inconsistent outcomes. Employers often struggle to gauge a graduate's true capability, resulting in costly retraining and discouraging investment in apprenticeship training. Programmes delivered through unit standards frequently fragment learning, preventing learners from demonstrating how skills are applied holistically in the workplace.

Shifting towards programme-based course delivery would restore the depth and rigour of the historic 8,000-hour trades certificate, which consistently produced highly capable graduates – a benchmark still recognised and valued by the industry today. A course-based achievement curriculum provides a cohesive, contextualised learning experience.

Foundation skills in literacy, numeracy, and digital capability must be embedded early. Assessment tools such as LNAT should be made accessible to employers at the recruitment and induction stage, particularly for international recruits who are often eager to pursue higher education qualifications. This would allow employers to provide targeted support in the workplace and foster lifelong learning, especially as emerging technologies demand new skills from learners of all ages. For younger learners, strengthening these capabilities through revised NCEA pathways at secondary school will ensure they enter tertiary education prepared to succeed.

While data shows disparities in achievement across Māori, Pacific, and disabled learners, MTA notes that support should not be framed solely on the basis of ethnicity. Barriers to achievement are often shaped by socioeconomic disadvantage, access to opportunity, or prior learning experiences. Achievement strategies should be inclusive, targeting need wherever it exists, to ensure all learners have access to the support required to succeed

regardless of their ethnic identity. Focusing solely on ethnicity risks unintentionally isolating learners and employers, highlighting underachievement among certain groups while deprioritising others. A regional or community-based approach that supports all learners – regardless of ethnicity, age, gender, ability, or other diverse learning needs – would be more effective.

Almost half of today's automotive workforce does not hold a formal qualification. For many, this stems from apprenticeships or training pathways that were never completed after the era of the trade certificate. As a result, a generation of technicians is benchmarked on years of experience rather than recognised credentials. This is particularly evident in areas such as Warrant of Fitness inspection, where individuals without a formal qualification can still become inspectors after four years of experience under NZTA Waka Kotahi criteria. While experience is valuable, this undermines the efforts of those currently undertaking formal training, devaluing qualifications as a consistent and verifiable standard of competency across the industry. If unqualified individuals remain in the workforce, how can they be expected to support or deliver training effectively when they themselves have fallen through the gaps? Greater accountability is needed from providers to ensure all learners receive the support, guidance, and structures necessary to achieve meaningful qualifications and uphold high industry standards.

Achievement must also account for the future leadership of the industry, creating a secure pipeline of technicians as a succession plan, particularly as many automotive businesses face generational transitions with an ageing workforce. Some learners will not only need to be equipped to enter employment but also to take on entrepreneurial and managerial responsibilities, ensuring the sustainability of regional businesses and the sector as a whole.

4. Priority 2 – Economic impact and innovation

MTA supports the inclusion of economic impact and innovation as a strategic priority. These are inseparable from achievement in vocational industries such as automotive. The tertiary education system must ensure that graduates are ready to meet workforce needs and capable of driving innovation. Employer engagement in programme design and delivery is central to this. Too often, provider-based learning does not adequately prepare graduates for the complexities of real-world workplaces.

Work-based learning allows learners to apply technical, diagnostic, and customer-facing skills in authentic contexts – essential for a sector facing rapid technological change. In these settings, learners are exposed to the latest equipment, tools, and technologies that

reflect real-world conditions, something training providers often struggle to replicate due to cost.

Research is vitally important. High-quality data and research enable government, providers, and industry to identify skill shortages early and respond with training that is both timely and relevant. This is particularly critical as the workforce ages and many business owners in the automotive sector look to sell or exit their businesses over the next 5–10 years. Anticipating these shifts creates an opportunity to engage secondary school students earlier through proposed vocational programmes, preparing them for tertiary education, apprenticeships, and ultimately, industry leadership. At the same time, broader research into the future of work and the skills required – such as digital literacy, advanced diagnostics, emissions management, electric and hybrid vehicle capability, customer service, and business management – is essential to ensure New Zealand remains globally competitive. Positioning New Zealand as a country with a forward-looking, skills-based workforce also makes it a more desirable place to study, live, and work.

The proposed changes emphasising stronger employer and industry input into programme design and delivery are strongly supported. Employers in the automotive sector consistently report that provider-based graduates lack workplace readiness. Simulated environments do not adequately prepare learners for the realities of complex trades such as automotive. We therefore strongly support the expansion of work-based learning as the most effective means of developing job-ready graduates.

Industry Skills Boards (ISBs) play a critical role in this context – not only advising on emerging skills requirements through close engagement with industry, but also ensuring that qualifications are structured correctly, consistently delivered, and underpinned by robust research. Their role is essential in bridging the gap between industry demand and the tertiary education system, ensuring that training reflects the pace of technological change while also meeting regional workforce needs. ISBs should provide the sector with a mechanism for aligning programmes to real-world practice, reducing duplication, and addressing gaps where provider-led models have historically failed to deliver work-ready graduates. Beyond technical competencies, programmes shaped by ISB input must also support entrepreneurial and leadership capability, preparing learners to step into business ownership as older generations of operators transition out of the industry. In this way, ISBs safeguard both the integrity and the future-readiness of vocational training, ensuring the workforce remains capable, competitive, and aligned with New Zealand's economic priorities.

5. Priority 3 – Access and participation

Access and participation should be measured not only by enrolment but also by meaningful engagement with work-integrated learning opportunities. For the automotive sector, this means learners are able to earn while they learn, acquiring skills that are immediately applicable in the workplace.

Regional alignment is critical. Many polytechnics produce graduates who are either not work-ready or who live in regions with limited employment opportunities due to smaller local populations. This can force learners to relocate after graduating from a full-time programme, separating them from their families, support networks, and communities. In the worst case, full-time graduates remain in their region but do not enter the industry at all, with a student loan hindering them from pursuing further study. Expanding high-quality work-based learning in regional areas allows learners to train and gain skills where they live, earn while they learn, and directly contribute to local businesses. This approach not only improves workforce readiness but also addresses regional skills shortages and strengthens local economies.

Secondary-to-tertiary pathways must also be strengthened. Early exposure to trades through school programmes – such as the proposed revamp of the NCEA system – will enable learners to build confidence, literacy, and numeracy skills, and better prepare them for apprenticeships and vocational study. In theory, this should reduce dropout rates and ensure that learners progress effectively through the education system into meaningful employment, with foundational skills that support work-readiness alongside the business capability employers require.

Micro-credentials provide a flexible, “bite-sized” approach to learning that benefits both learners and employers. By breaking complex skills into smaller, focused chunks, learners can progressively develop competencies and apply new skills immediately in the workplace. For employers, this enables targeted upskilling aligned directly with current business needs and technological developments, improving efficiency and productivity.

Crucially, because traditional qualifications often take up to five years not only to review but also to develop, they risk becoming outdated as technology evolves. Micro-credentials, being modular and updatable, allow faster adaptation to emerging technologies and changing industry requirements. This ensures that training remains relevant, supports workforce capability, and keeps both learners and employers engaged in meaningful, business-focused tertiary education. Accumulated micro-credentials can also contribute to a full qualification, offering structured career progression while enhancing business performance.

6. Priority 4 – Integration and collaboration

Integration and collaboration are fundamental to ensuring that tertiary education aligns with workplace realities and regional needs. For too long, the industry has focused on learning for its own sake, without fully engaging with industry developments or workforce requirements. Lengthy qualification review processes and NZQA approval timeframes prevent providers from responding quickly to emerging skills gaps, leaving employers without access to qualified, job-ready workers – and forcing the industry to rely on immigration to fill the gap.

In the automotive sector, collaboration must be employer-led and outcome-focused. Providers, employers, and industry stakeholders should co-design curricula, assessments, and progression pathways. Learners benefit from integrated experiences that combine technical skills, problem-solving, and applied innovation, while employers gain a workforce ready to meet the challenges of a rapidly evolving industry.

Regional collaboration is particularly important. Learners in provincial areas should have access to work-based learning opportunities close to home, reducing relocation barriers and ensuring alignment with local employment demand. Applied research must also be linked to vocational training, embedding technological advances and innovation directly into the learner experience.

Effective integration requires strong partnerships across the system. Employers, providers, industry stakeholders, and research organisations must work together to anticipate emerging skills requirements, co-develop programmes, and ensure that tertiary education remains agile and responsive. This approach supports not only learner success but also regional economic development and national productivity.

7. Priority 5 – International education

We strongly support the goal of boosting international student numbers as part of the Government's International Education Going for Growth Plan. International education is not only a significant industry but also a driver of global engagement, innovation, and workforce development. Positioning New Zealand once again as a destination for high-quality tertiary education sends a clear signal to the world that our qualifications are internationally recognised and valued.

Historically, international students coming to New Zealand have largely entered through full-time, provider-based study at universities, polytechnics, and private training establishments. This pathway served the sector well prior to the pandemic, but it has

limited opportunities for international students to engage in work-based learning – particularly apprenticeships in the automotive and wider trades.

International students interested in automotive have typically enrolled in pre-trade programmes at polytechnics (e.g. Level 3 automotive) with the aspiration of moving into employment. However, visa settings, funding models, and policy structures have not enabled these learners to transition easily into apprenticeships, which remain employment-based training pathways. Employers have also faced uncertainty about visa arrangements and funding, making them less likely to take on international students in apprenticeship roles.

We believe there is a significant opportunity to address this gap. Aligning immigration policy, funding, and employer incentives could enable New Zealand to position apprenticeships as a genuine international education offering, particularly in high-demand areas such as the automotive industry. This would provide international students with stronger links between study and career opportunities, aligning with global shifts in learner expectations. It would also strengthen New Zealand's workforce development and economic growth by attracting motivated learners into areas of skill shortage, while enhancing the competitiveness of our international education system by diversifying pathways beyond traditional full-time study.

It is also important to address the recognition of international qualifications. The current International Qualifications Assessment (IQA) process often confuses employers, who are then left to rectify capability gaps themselves. Given the automotive sector's reliance on immigration to address skills shortages, this issue must be resolved. Those entering the workforce through immigration could also be the employers of tomorrow, and they must have clear pathways to gain New Zealand-equivalent qualifications and build the capability to train the next generation.

As the Going for Growth Plan moves forward, we recommend that international apprenticeships – particularly in sectors like automotive – be explored as part of the broader system strategy. This would require consideration of immigration settings, funding alignment, and employer support, but it offers a way for New Zealand to differentiate itself globally while also addressing domestic workforce needs.

In this way, international education can not only grow as an export but also contribute directly to New Zealand's productivity, skills development, and long-term economic strategy.

8. Conclusion

MTA supports a Tertiary Education Strategy (TES) that prioritises work-based, employer-led learning, strong secondary-to-tertiary pathways, regional alignment, and responsiveness to technological change. From an automotive sector perspective, success measures must reflect the real-world outcomes of both learners and employers.

Achievement should capture workplace readiness, progression from prior achievement levels into industry roles, and the ability to apply skills effectively in employment – not simply the completion of formal qualifications. It must also ensure inclusivity for all learners living in New Zealand.

Economic impact and innovation should be assessed through graduate capabilities, employer satisfaction, and the translation of research into practical workplace solutions.

Access and participation should consider the regional availability of roles, the flexibility of programme delivery, and the likelihood of successful progression into employment within learners' local communities. This approach supports a community-focused education system that meets local needs while driving social and economic growth.

Integration and collaboration should be measured by the effectiveness of partnerships with employers, communities, and research organisations, as well as the responsiveness of programmes to emerging technologies and workforce demands.

International education remains important for polytechnics and universities. However, for work-based vocational sectors, the priority must be developing local talent to meet industry needs. International students can complement domestic training but should not take precedence over addressing local workforce shortages.

By embedding these principles across all TES priorities and TEC success measures, New Zealand can ensure that learners are job-ready, adaptable, and capable of contributing to economic growth and innovation – while employers have access to a skilled workforce that meets the evolving needs of the automotive sector.

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

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The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

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Submitter details

Full name	9(2)(a)
Organisation name	Muka Tangata
Organisation category (please indicate):	• Workforce Development Council
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) *@mukatangata.nz*

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	[Comment]
Do you have suggestions for additional activities to support this priority?	[Comment]

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Final Comments

11. **Do you have any other comments on the draft Tertiary Education Strategy?**

The Strategy's focus on economic growth with a shift to better align tertiary education with the needs of industry, echoes what we have heard when engaging with our industries in the food and fibre sector.

The priorities of Achievement, Access and Participation, and Integration and Collaboration seem sensible areas for delivering on that shifted focus.

However, we do have three key critiques of the Strategy:

1. The missing 'How'

Whie the Strategy is clear on what it wants to achieve, it lacks detail of how that will be achieved.

We appreciated that as the Strategy is operationalised, a clear set of actions will be put into place, but at the moment the 'contributing activities' sections read more as extensions of the aims, rather than concrete

actions which will drive the necessary changes. More detail on how the levers of funding, regulation, and monitoring will be used to incentivise behaviour would be useful.

At this point, there is insufficient detail to answer the question "*To what extent will the expected changes and contributing activities effectively achieve the policy*?".

2. Missing work-based learning

For a strategy focusing on getting learning to connect to industry needs, there is little direct mention or emphasis on work-based learning. Work-based learning may be implied in the mix of provision, but it is not explicitly referenced like universities and polytechnics are.

The Strategy leaves an impression of a university focus.

3. Mismatch between the TES's desired outcomes and Government's actions to date

Connected to the 'how': In our engagement with food and fibre industries, some have indicated that the Government's actions as part of the changes to the VET system run counter to the TES's desired outcomes. In particular, they noted a system that has less industry voice and responsiveness; takes a focus on provider financial viability, not learner/industry outcomes; and that funding is being reduced for work-based learning.

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Submitter details

Full name	9(2)(a) (on behalf of NMIT)
Organisation name	NMIT
Organisation category (please indicate):	Polytechnic (including divisions of Te Pūkenga)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	*oia@nmit.ac.nz*

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The objective is clearly aligned with economic productivity and innovation, but it would be strengthened by embedding explicit equity and parity targets for Māori, Pasifika, and equity ākonga, ensuring these sit alongside economic goals to create a balanced, learner-centred system.

At present, the definition of "quality of life" is vague, creating a risk that economic productivity could become the dominant measure, while stakeholders, industry, and communities may each hold different understandings of what "quality of life" entails, leading to a mismatch between policy settings and regional needs.

A further tension lies between the drive for a "high productivity economy" and the broader values underpinning education, particularly in areas such as the social sciences, arts, and community or foundational education, where value cannot be neatly captured through measurable productivity.

There is also concern that the language of "knowledge" and "skills" does not convey adaptability, agility, or continuous learning - capabilities essential in fast-changing labour markets where objectives should extend beyond immediate skill needs. Taken together, the emphasis on economic output risks creating pressure for providers to demonstrate direct economic return, prioritising only sectors with clear market demand and overlooking areas of strategic or cultural significance to regions.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

The drivers correctly identify workforce and productivity needs, but place less emphasis on demographic change, underserved learner needs, the role of collaborative partnerships including those that are Tiriti-based. To respond effectively, the tertiary system must become more agile, data-driven, and collaborative, with inclusivity and adaptability at its core. This means embedding continuous labour-market intelligence into planning, co-designing provision with industry and communities - particularly Māori and Pasifika - and ensuring greater flexibility in funding, regulations and delivery so that qualifications and credentials can quickly adapt as demand shifts. Such responsiveness is especially critical for regional providers, who play a key role in supporting and advancing regional advancement and adaption to change.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**
The current priorities are directionally sound, but several gaps remain. While lifelong learning and reskilling are implied, they need to be made explicit as part of a focus on future readiness and adaptability, ensuring learners can keep pace with constantly changing market needs. There is also a need to emphasise labour market intelligence and demand forecasting, with access to robust, real-time data on skills demand guiding investment decisions. Partnership and co-design should be a distinct priority, making collaboration with industry, iwi, and communities non-negotiable in curriculum design, governance, and review. Finally, the notion of being "world ready" could be strengthened by broadening the current focus on international education to encompass global competency more widely, explicitly supporting government strategy around growth and international trade.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Neutral
Comments	The emphasis seems to be around ongoing investment into achievement activity with a lack of repercussions for those providers who continuously have low rates of achievement (across the board or for specific learner groups). Greater emphasis on improvement plans / penalties for providers who have low achievement rates would ensure tangible change that is embedded within provider organisations, not just ad hoc 'improvement' activity that is short-term / project based and requires additional funding.
Do you have suggestions for additional activities to support this priority?	Portion of delivery funding tied to achievement rates Penalties / requirement to improve for those who underperform Achievement minimums

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	Agree
Comments	Economic impact and innovation in this document are primarily focused on income generation and growth. There is minimal acknowledgment of how education, training, innovation and research can have a positive financial impact for NZ if they are aligned to improving social and cultural determinates that are financially burdensome.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Neutral
Comments	The greater emphasis on research that has tangible results for innovation and growth is supported. However, the changes should also encompass innovation and improvement for social and cultural outcomes, as poor social and cultural outcomes lead to a greater financial burden for NZ. I strongly disagree with the focus on more/new providers (referenced in the work-based learning section) as this increases funding of overheads. The focus should be on current

	providers doing more and being more responsive to industry needs, facilitated / guided by ISB's. Focused too strongly on university activity – NMIT delivers STEM qualifications and programmes up to master's level that are aligned with relevant local, national and international research, alongside other tertiary education providers. This includes NMIT's collaboration with international and domestic partners – the concern is that the greater emphasis on universities will underserve our organisation, our partners and our top-of-the-south region of Tasman, Nelson and Blenheim.
Do you have suggestions for additional activities to support this priority?	Investment into intelligence data, analysis and co-design activity.

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Agree
Comments	Unpinning L1-3 training constraints are EFTS allocations and funding caps. These need to be addressed to ensure the ability to deliver to historically underserved priority learners. There are major constraints to the development and accreditation of micro-credentials – the long, restrictive and arduous process for a small portion of learning (and minimal associated funding) prohibits a comprehensive suite of micro-credentials being developed and delivered.
Do you have suggestions for additional activities to support this priority?	

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	Strongly agree

Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Agree
Comments	
Do you have suggestions for additional activities to support this priority?	Clear expectations should be set and structures designed that ensure emerging / under resourced industries and SMEs have a voice alongside large and established industries and companies. Iwi, hapū and marae partnerships are not the sole domain of wānanga - many other tertiary providers have long enduring and mutually beneficial relationships with Māori. This should be reflected in any reference to any tertiary provider relationships with iwi, Māori and hapū.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	There is a risk this priority could been seen as pure revenue opportunity. It should be explicitly linked to global competencies of NZ learners, international research partnerships, and aligning international programme offerings to NZ's long-term workforce and innovation needs.
Do you have suggestions for additional activities to support this priority?	Investment in student accommodation.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	Polytechnics (particularly regional providers) have unique responsibilities in regions. They are an anchor for regional skills, innovation and community wellbeing, ensuring equity and access that ensure underserved learners can succeed. Polytechnics are best placed to deliver applied, vocational and work-integrated education that allows for flexible and seamless integration between both study and work. They can support both school leavers and the upskilling or reskilling of learners without them having to leave a region. They also play a key connecting role between schools, iwi, industry, employers, iwi and not-for-profit organisations.
Private Training Establishments (PTEs)	Should focus on specialised and niche education that is flexible and small scale. Emphasis should be on training spaces where polytechnics, wānanga or universities don't have the scope or agility to deliver the specialised training i.e.; it should be complementary not competing. PTEs should be encouraged to keep innovating to add depth or flexibility to that which is offered by others. PTE programmes should complement ITP offerings, rather than undermine/compete against them.
Industry Skills Bodies (ISBs)	ISBs should provide system level intelligence on current and emerging skills trends and be national convenors of industry for strategic direction and programming. Their focus should be future skill forecasting to inform the nationwide sector. Specific regional skill forecasting should remain with providers who work in partnership with the ISB to ensure a region is not underserved.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	TEC, MOE, NZQA, MBIE: Agree that these agencies should address issues of duplication, confusion regarding roles and responsibilities, over-administration and the burden of compliance which has limited to no meaningful benefit to learners, providers or industry/community. TEC: should have greater powers to address poor performance quickly and tangibly in the sector. NZQA: NMIT is committed to quality and integrity in qualifications and the delivery of them, however onerous processes and requirements that have little tangible value should be addressed. As providers increasingly pay more for NZQA services, then NZQA services should be delivered in a commercially responsible way that understands and reflects the needs of the sector.

Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Rather than invest in 'Distance travelled' measures, a focus on improved sharing and analysis of information across government departments would potentially provide the same information.

Final Comments

11. **Do you have any other comments on the draft Tertiary Education Strategy?**

While the draft articulates strong general statements, it is less clear on the mechanisms that will bring these aspirations to life. Questions remain around how industry and stakeholders will meaningfully feed into decision-making at system, provider, regional, and programme levels; and how provision will be shaped to ensure genuine alignment of supply with demand. Without these details, there is a risk that the strategy may remain aspirational rather than delivering tangible outcomes.

The draft TES would also benefit from clearer commitments to equity and the Treaty. This could be strengthened through the inclusion of specific equity targets, explicit embedding of Treaty partnership expectations across all priorities, and protections to ensure equity resourcing is safeguarded alongside ambitions for growth.

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Submitter details

Full name	9(2)(a)
Organisation name	Boating Industries Association of New Zealand Inc - trading as NZMarine Industry Association
Organisation category (please indicate):	9(2)(a)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2) *@nzmarine.com* ( )

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

   The Introduction on page 3 and Purpose of the TES on page 4 all looks very good except for the sentence 'Our poor record in productivity and value -add suggests that there are particular gaps in market -driven entrepreneurial skills.' I do not agree with this statement. It could just as equally be written 'Our poor record in productivity and value-add suggests that there are particular gaps in the NZ tertiary education system'. I actually think that the main reason for 'Our poor record in productivity and value' is NZs long distance to main markets and distance to international labour supply.

   My suggestion is to delete the above sentence or put it in the positive of 'Increasing productivity and value-add, through industry lead vocational education and tertiary education, will add to the economic growth of New Zealand.'

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

   I agree with the content on page 5 and 6 but there should be inclusion of 'employers' (inclusive of their work force-employees) in several areas . For instance, the majority of research and development in NZ is done by employers not by tertiary education providers.

   In the last para 'Providers will need to evolve their practices to meet changing learner needs, respond to shifting labour, market and community demands - - - 'could add "employers" to this list.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

   The five listed bullet point priorities as listed mean very little by themselves. If each had the 20 or so words description as per on the following pages, then this introduction to the priorities would be a good summary and more easily understood by readers.

   All the priorities miss a major key point- The role of the employer.
   In the main, it is the employer that gains or loses economic growth for NZ and living standards for all New Zealanders'. The Tertiary Education Strategies 5 priorities are missing this important and pivotal role -of the employer, in upskilling a nation.

   Vocational education, particularly through employers should be a priority. This would include pathways for school leavers into employment, employers having in house training managers, in house training programs and using TEC/NZQA approved training providers in supporting employees upskill in the respective industries and roles. Successful achievement of this priority would provide a key driver of economic growth and a higher living standard for all.

   The Strategies appear to have a bias to championing people to go to universities or polytechnics.
   For a strategy that is wishing to gain the support of most employers, employees and schools in addition to tertiary education providers- then each of the priorities should note the key role that employers have.

   For your information, we estimate that 90% of the 1200 companies that form the New Zealand marine industry are owned and have a CEO that is trade trained (some with a formal qualification and some with not) and have not been to university. The New Zealand marine industry is one of the largest manufacturing industries in NZ and though innovation and world leading products exports over 50% of what is manufactured in NZ. The MAST PTE itself is world leading in how it responds to industry demands and is innovative in its School to Work program where year 12 and 13 school students are invited to work one day per week in the workplace and have a specific pathway program with an employer leading to an apprenticeship. This is not a Gateway program and is far more targeted, to the extent that the school learner has to apply to the employer for the work experience role -there by starting by learning to write a CV. The success rate of this Work to School program is very high, and we recommend that it is rolled out to all industries nationwide. It would assist in addressing some the skill/employment problems in our regions in addition to the cities.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	
Do you have suggestions for additional activities to support this priority?	Profiling of the trades, as a good career option at schools. The examples should include -support employers to provide best practice training to improve outcomes and trainee/apprentice experience.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Agree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree
Comments	
Do you have suggestions for additional activities to support this priority?	The examples should include -best practice of employers R+D and engagement with tertiary providers.

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Disagree
Comments	
Do you have suggestions for additional activities to support this priority?	The pivotal role of the employer in assisting young people gaining a job, an apprenticeship and training as you earn opportunities for all socio-economic groups.

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Agree
Comments	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	
Do you have suggestions for additional activities to support this priority?	The examples should include -best practice of employers involved.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Agree
Comments	
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	This will provide good economies of scale for training providers with increased number of students, thereby also assisting NZ students with professional tertiary training.

Do you have suggestions for additional activities to support this priority?	[Comment]

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	There is no/little mention of 'employers' and 'apprentices' for work-based training. ISBs should be also working with employers and apprentices to set national standards.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

The key success measures are all very good.

Good to see 'There is also value in recognising outcomes that support employment but do not result in a formal qualification.' Loyal employees often provide the backbone of companies and in many cases these employees, who add good value, do not have a qualification.

Approximately ten years ago NZQA sought increased extensive written evidence of achievement, for apprentice's assessment material, for attaining Unit Standards. From that point of time, we saw the number of registered apprentices, that struggled with writing the evidence of their capabilities, decline. Many of these workers, often from underrepresented groups, were/are good workers adding value but were/are still effectively shut out of the tertiary education system. The policy makers may think that there are provisions to assist and yes, the special funding for people with learning disabilities is helpful in some cases but the majority of people in the above referred situation are not signed up as apprentices any more due to NZQA strict assessment criteria. A NZQA willingness, and dialogue with industry on how to address this problem would be a good start to finding a solution. A solution to this would particularly assist some regions economic outlook.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

It is good to see a fresh strategy and with measurable outcomes. Also, good the endeavour to have all stakeholders to buy into it and champion it.

We appreciate the opportunity to add our comment to it – thank you.

Te Tāhuhu o te Mātauranga
Ministry of Education

We **shape** an **education** system that delivers **equitable** and **excellent outcomes**

He mea **tārai** e mātou te **mātauranga** kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**

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Te Kāwanatanga o Aotearoa
New Zealand Government

SUBMISSION

New Zealand MINERALS COUNCIL

Feedback from New Zealand Minerals Council to the Ministry of Education Draft Tertiary Education Strategy

September 2025

Introduction

1. New Zealand Minerals Council is the industry association representing the New Zealand minerals and mining sector. Our membership is comprised of mining companies, explorers, researchers, service providers, and support companies.

2. We welcome the opportunity to provide feedback on the Government's Draft Tertiary Education Strategy.

3. We are commenting here on the document *Tertiary Education Strategy – Draft for targeted sector consultation.* First, we provide some background on the importance of the tertiary education sector to the minerals industry.

Background

4. Mining companies employ people from a range of trades and highly trained professions in fields including environmental science, geology and engineering.

5. The tertiary education system, academic and vocational, is crucial for providing the skilled workforce that the minerals sector relies on.

6. According to MITO, the industry training organisation supporting the extractives sector, approximately 16% of the mining and exploration workforce in New Zealand is employed in highly skilled occupations. 57% have a tertiary qualification and 17% have degree level qualifications.

7. The mining and exploration sectors are growing and there is an increasing need for more trained workers.

8. It is estimated that at least 2,000 new mining workers will be needed by 2035 as new projects proceed and existing mines expand. This is consistent with the Government's goal for doubling mineral exports and increasing employment growth from 5,000 to 7,000 people.

9. It is important for the minerals sector that the tertiary education system can provide a strong pipeline of skilled professionals to meet this future need.

10. It comes against a backdrop where demand for such skills is increasing world-wide and New Zealand workers are drawn to Australia and beyond where mining incomes are higher than in New Zealand. This outflow is compounding the risk of significant workforce shortages that New Zealand mining faces.

11. To make up for this brain drain, i.e. the loss of New Zealand trained workers, a proportion of workers that the New Zealand industry is employing come from overseas.

12. Mining companies in New Zealand want to employ New Zealanders as well as overseas people, reinforcing the need for a tertiary education system which can provide the workforce the sector requires.

Submission

Strategic Direction Objective

13. We support the proposed objective of the Tertiary Education Strategy:

> *A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.*

14. The strategy has an increased focus on economic growth. We support this and we note that it does not need to come at the expense of the other objectives of a broad tertiary education system nor, as some critics might suggest, limit the range of courses offered.

15. A broad curriculum encompassing all facets of knowledge is key to achieving economic growth.

16. The mineral sector's contribution to economic growth is significant. It is the country's most productive sector providing high wage jobs in the regions and is responsible for increasing export receipts. The minerals sector needs to be catered for in the Tertiary Education Strategy.

17. The tertiary education system can enable mining's contribution to increasing New Zealand's economic growth by providing a workforce with a broad range of skills and knowledge to meet the range of professions and trades that are basic to the mining sector's needs.

Priority 1: Achievement

> *Ensure students and trainees achieve qualifications that lead to good careers and economic security, with a focus on strong pathways between school, tertiary education, and work.*

18. We agree that achievement should be a priority in the Tertiary Education Strategy. The acquisition of meaningful skills is what matters to employers, including in the mining sector. The system needs to ensure courses provide these skills and that their acquisition is reflected in the associated qualifications.

19. We support increased numbers of providers moving into work-based learning and developing new apprenticeship and traineeship programmes.

Priority 2: Economic Impact and Innovation

> *Increase the economic impact of tertiary education by delivering relevant, adaptable skills, and research that drives productivity, innovation, commercialisation and broader economic opportunities.*

20. We agree tertiary education delivering relevant, adaptable skills; and research that drives productivity, innovation, commercialisation and broader economic opportunities will contribute to increased economic growth.

21. We are concerned that in recent years there has been a decline in university earth sciences training, particularly geology. This has implications for the minerals sector both in terms of the employment of graduates within mining companies with the right level of technical skills, and also research capability which will add value to the sector both from mineral exploration through to the application of minerals in manufacturing supply chains.

22. Demand for skills in the minerals sector is growing and will continue to grow as minerals are increasingly sought for new technologies and mining activity in New Zealand increases. New Zealand employers are ever more having to look offshore for workers to fill their needs.

23. We agree with the statement in the strategy that New Zealand's research and innovation performance lags comparable countries. It has low levels of research commercialisation and limited business uptake of new knowledge and technology.

24. This is very relevant to the minerals sector. As with funding for university courses, funding for research in minerals science and geology both in universities and also Crown research institutions and other science organisations, has suffered in recent government science funding rounds.

25. It is important that the decline in university earth sciences training is turned around and that the minerals research capability that New Zealand has built up over many years continues to be developed, particularly given the global race to secure and maximise minerals for technology, energy, medicine, and the like.

26. Research and development in the exploration, extraction, processing and use of minerals has the potential to add considerable economic benefit for New Zealand.

27. We acknowledge the recent establishment of Earth Sciences New Zealand and hope that it and other similar institutions working in the minerals areas are well resourced and enabled to focus on adding value to the sector.

Priority 3: Access and Participation

> *Enable access to education and training for people from all backgrounds and regions, ensuring more people build relevant skills that contribute to a productive economy.*

28. We strongly support reducing barriers for groups of New Zealanders that may traditionally not participate in tertiary education. As well as benefiting the individuals concerned, fully capitalising on New Zealand's potential talent pool benefits industry, the wider economy and society.

29. High-quality information on career pathways and employment outcomes needs to be available to secondary school students, preferably some time before they are leaving school so they can make the right decisions about subjects they study.

30. At the same time, the system has incentivised too many people to opt for university and damaged the reputation and supply of school leavers moving into the trades. Universities have crowded out vocational training institutions to increase enrolments and, in the process, academic standards have declined as well as numbers opting for trades.

31. We support more agile and responsive delivery models to support upskilling and retraining in the vocational education areas. This needs to include more accessible work-based learning and quality online provision giving learners more options for accessing tertiary education.

Priority 4: Integration and Collaboration

> *Deepen collaboration between education providers, employers, iwi, research institutions, and communities to align education with regional and national economic development.*

32. We support the deeper collaboration between education providers and other groups as set out in Priority 4. Closer partnerships between tertiary providers and employers in particular are very important and the benefits go both ways.

33. For example, deeper collaboration between industry and tertiary education providers will help ensure that courses provided will meet the needs of employers. Knowing what skills are in demand from business will benefit educational institutions as well as the students and businesses themselves. A better understanding of the research programmes being undertaken in universities will benefit businesses.

34. Businesses and professionals in the minerals sector should be involved in helping the providers create and design both vocational education training and academic courses. Employers understand the skills needed within their respective industries.

35. For this purpose, we recommend collaboration between the tertiary education providers and industry and professional organisations. The New Zealand Minerals Council and the Australasian Institute of Mining and Metallurgy (AusIMM) New Zealand branch should be involved when it comes to our sector. These organisations can pull together representatives and employers to work with the Government in this process.

36. Governance bodies for mining-related programmes should include individuals with relevant industry experience.

37. Strong connections and collaboration between the minerals sector, the research, science and innovation sector, and government agencies will be important to ensure mineral sector research is optimised. Fostering strong partnerships with industry will help ensure research relevance and facilitate skills development aligned with industry needs.

38. We support the Tertiary Education Strategy placing emphasis on regional responsiveness, and the support of training tailored to local industry conditions and better engaging with Māori and rural learners, as these groups are highly represented in the extractives sector. The risk of variable quality arising from this would need to be managed.

NZCTU
Te Kauae Kaimahi

Submission to the Ministry of Education on the:

Draft Tertiary Education Strategy

Submitted by the New Zealand Council of Trade Unions Te Kauae Kaimahi

30 September 2025

This submission is made on behalf of the 32 unions affiliated to the New Zealand Council of Trade Unions Te Kauae Kaimahi (NZCTU). With over 340,000 union members, the NZCTU is one of the largest democratic organisations in New Zealand.

The NZCTU acknowledges Te Tiriti o Waitangi as the founding document of Aotearoa New Zealand and formally acknowledges this through Te Rūnanga o Ngā Kaimahi Māori o Aotearoa (Te Rūnanga), the Māori arm of Te Kauae Kaimahi (NZCTU), which represents approximately 60,000 Māori workers.

Introduction

1. The NZCTU welcomes the opportunity to comment on the draft Tertiary Education Strategy (TES). Our submission focuses on the high-level objectives of the draft strategy. We endorse the recommendations set out in the submissions provided by our affiliated trade unions.

2. Our two central recommendations are:

    - The final TES needs to reflect a more balanced and well-rounded understanding of the value of tertiary education.
    - The final TES needs to include the delivery of good work for tertiary education staff as a core priority.

The overarching objective of the TES

3. The NZCTU understands the importance of tertiary education as a driver of economic outcomes and agrees tertiary education needs to provide people with the skills needed to succeed in the world of work.

4. However, the draft strategy is unbalanced. The TES is clearly subordinated to the overarching objective of economic growth. As such, the actions identified in the TES are geared towards maximising the economic returns provided by tertiary education. This is clear on pages 21–23, where all the "key success measures" are economic in focus.

5. In this framing, tertiary education is understood primarily as a mechanism for training people to be productive workers, and research at tertiary institutions is understood to be primarily about making scientific discoveries that can be commercialised.

6. We are concerned by this narrow view of the value of tertiary education. Tertiary education plays a range of other, equally important roles in supporting cultural, social, political, and environmental development. This includes supporting informed public debate and democratic engagement – for example, universities are legislatively required to act as "critic and conscience of society". It also includes the production of arts and the development of cultural understanding and connection, which are key to social cohesion and wellbeing.

7. Ensuring the tertiary system can fulfil this broad role has perhaps never been more important. We are living in a period characterised by declining trust in democratic institutions, increasing inequality of wealth, rapid and destabilising technological change, and the increasingly real impacts of a changing climate. We cannot simply "grow" our way out of these challenges. To tackle them as a society requires social cohesion, an educated citizenry, and an active public sphere in which ideas can be debated and new ideas and art forms can be explored.

8. The NZCTU therefore recommends that the final TES reflects a more balanced and well-rounded understanding of the value of tertiary education.

Tertiary staff

9. Tertiary staff have been under pressure for many years now. The environment has been one of shrinking resources, the casualization of employment, and excessive workloads. In addition, more students are coming to university without the necessary level of prior skills, often because of economic disadvantage. This further intensifies the pressure that tertiary staff are under.

10. Staff in the vocational sector have experienced high levels of disruption over the past five years due to the reform of vocational education and its subsequent unwinding by the current government. This disruption will be ongoing for several more years at least. This is not a sustainable way to run the sector. Many staff are experiencing burnout and low morale as a result.

11. These factors negatively undermine educational quality and achievement. It is therefore essential the final TES recognises that stable, secure, and well-resourced staffing is a necessary condition for achieving the objectives of the strategy, particularly achievement (priority 1) and economic impact and innovation (priority 2). The TES needs to set out a high-level plan for achieving good work for tertiary education staff across the sector. This is missing from the draft.

Stable funding

12. The draft TES cites "fiscal constraints" as a systemic pressure confronting the tertiary sector. However, it's important to understand these constraints are the result of political, not economic dynamics – i.e., the government has deliberately narrowed its fiscal space to meet arbitrary debt and expenditure targets. The reality is that government could choose to take a different approach to its fiscal and economic management – for example, by increasing tax revenue to provide more resources into tertiary education. "Fiscal constraints" should therefore not be framed as a structural pressure on the tertiary sector – this is misleading.

Priority 1: Achievement

13. The NZCTU agrees that student achievement is a fundamental goal of tertiary education. However, we are concerned the directive to align tertiary achievement and labour market outcomes in programme design and the tracking of outcomes is too narrow to be applied across the tertiary system. Gaining employable skills is of course an important part of tertiary study. But it is only one aspect of the value of tertiary education. In addition, some fields of study are less directly vocational than others – i.e., gaining employable skills is not their only goal. Thus, aligning tertiary achievement and labour market outcomes makes most sense in vocational education, but is not necessarily a very useful objective for many university-level courses of study.

14. We therefore recommend that, in addition to qualification completion and job attainment, achievement is also measured in terms of academic progress and the development of students' intellectual, civic, and cultural capabilities.

15. The TES glosses over important socioeconomic factors that negatively affect achievement rates. For example, many students experience economic precarity while in tertiary education. Those students whose parents can't support them financially often have to work long hours to earn rent, food, and electricity money; this makes it hard for them to succeed academically.

16. For the purposes of the TES, these barriers can be reduced through greater provision of financial support for students. At a broader level, these barriers will only be eliminated if the government moves to meaningfully tackle poverty and persistent disadvantage at its root; however, we recognise this is probably outside the scope of the TES itself.

Priority 2: Economic impact and innovation

17. The draft TES appears to strongly favour applied research, due to its direct ability to be commercialised. Applied research is certainly important and the NZCTU supports initiatives to lift R&D in New Zealand.

18. However, a balance needs to be maintained between basic and applied research. Applied research necessarily builds on the findings of basic research. Neglecting to foster basic research would effectively cut off a crucial link in the research pipeline.

19. In addition, it's important to note that commercialisation is only possible in some fields of study – mostly the STEM areas. An overly zealous approach to boosting research commercialisation would risk leaving non-STEM areas behind.

20. The draft TES notes that greater "employer, industry, and iwi input into programme design and delivery" is desirable, particularly for vocational education. It is critical that workers and their representatives in trade unions are understood to be part of industry in this respect.

21. While employers have important information about how well aligned vocational education is with the needs of their firm or industry, this information is incomplete. Workers hold equally valuable information – for example, regarding how well a tertiary course of study prepares them for a job, barriers to achievement they may encounter, and where there may be misalignment between theory and practice.

22. The NZCTU recommends that the ISBs should therefore be mandated to engage with workers and the ISB boards should include representation from trade unions in the industries they cover. In addition, ISB funding will likely need to be increased. With the transition from WDCs to ISBs, the funding allocated to this part of the tertiary education system is effectively being cut in half. This makes it highly unlikely that the ISBs will be able to effectively engage with all necessary stakeholders as well as fulfilling their other roles.

Priority 3: Access and participation

23. The NZCTU supports this priority, and notes that the government has a particular obligation, under Te Tiriti o Waitangi, to ensure equitable outcomes for Māori.

24. However, we refer to our comments above regarding the socioeconomic roots of disparities in access and achievement. Unless we address the structural roots of disadvantage – the causes – then measures to improve access and participation will always be second-best and only partially effective.

25. The NZCTU is wary of overuse of online/blended learning options. Although some online provision is of course needed and can be helpful in supporting participation for people with challenging life circumstances, it can also erode the quality of the education. Use of online provision therefore needs to be assessed on a case-by-case basis. The same is true for offering shorter courses, as these can have undesirable impacts such as undermining attainment of higher-level qualifications. They should also only be considered on a case-by-case basis.

Priority 4: Integration and collaboration

26. The NZCTU agrees that greater collaboration across tertiary institutions, and with external stakeholders, is desirable.

27. Regarding collaboration of the vocational education sector with employers and workers, we refer to our comments in paragraphs 20–22 above.

28. An important barrier to collaboration is that tertiary staff often have to engage in collaborative work without any workload relief or recognition for doing so. Setting up collaborative research projects, for example, takes significant time and energy. Researchers who are already stretched by a hefty teaching and administrative workload, and who face pressures to

publish in the short-term, are often not able to do this work. Enabling effective collaboration will therefore require that workloads are made more manageable for tertiary staff.

29. The draft TES notes, under examples of contributing activities, that it will be desirable to "Build on tertiary education institutions' distinctive research strengths, through greater specialisation, where appropriate". Greater specialisation may be desirable in certain areas, but this must be done very carefully, especially at the university level. It is important to maintain access to a broad range of courses in our universities as they serve different regions of the country, and part of the value of a university education is the ability for students to take a range of papers in the course of their study – this contributes to a well-rounded education and to the intellectual vibrancy of the university itself.

Priority 5: International education

30. International students make important contributions to the tertiary sector and wider New Zealand society. The draft TES sets out an ambition to double revenue from international students by 2034 (consistent with the government's broader ambition to double export earnings over this period).

31. There is a risk that this aspect of the TES is setting tertiary institutions up to replicate the past problem of over-reliance on international students as a revenue source. The COVID-19 pandemic exposed the fragility of this approach by bringing a sudden stop to international student numbers (and thus international student revenue). Tertiary institutions must have stable and sufficient core funding that is sourced domestically.

Conclusion

32. The NZCTU thanks the Ministry of Education for the opportunity to comment on the draft TES. There is much of value in the draft strategy, but we are concerned that its main emphasis – tertiary education as a driver of economic growth – is too narrow.

33. Tertiary education plays multiple key roles in our society, and supporting economic development is only one of them. Of equal importance are its roles in fostering a democratically engaged citizenry, teaching critical thinking and creativity, and supporting cultural development and understanding. The main theme of our comments above is that the final TES needs to better reflect and address these broader roles of tertiary education.

34. The other critical point we wish to reemphasise is the importance of ensuring our tertiary education institutions are providers of good work. Tertiary education staff have been under increasing pressure for many years now. The reality is that, if this problem is left unaddressed, the government will not be able to deliver on its other priorities for the sector.

For further information, please contact

9(2)(a)

@nzctu.org.nz

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	New Zealand Writers Guild | Puni Taatuhi o Aotearoa
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
~~Request to withhold part or all of submission~~	~~Please indicate which part of your submission should not be published and why.~~
Email address For contact in response to Official Information Act request only.	9(2) @nzwritersguild.org.nz

New Zealand Writers Guild | Puni Taatuhi o Aotearoa (NZWG)[1] thanks Ministry of Education (MoE) for the opportunity to submit feedback on the draft Tertiary Education Strategy 2025.

NZWG represents screenwriters. As the primary source of work and income for screenwriters is scripted content created and developed in Aotearoa New Zealand, our submission focuses on areas that support the screen sector eco-system for domestic productions.

WHO WE ARE

NZWG is the professional membership association and registered trade union of Aotearoa New Zealand screenwriters, established in 1976. NZWG is committed to working in a way that adheres to the spirit and the principles of Te Tiriti o Waitangi. NZWG is a member of the International Affiliation of Writers Guilds (IAWG), Council of Trade Unions (CTU NZ), and WeCreate.

OUR GUIDING PRINCIPLES

Below are the NZWG aims and objectives relevant to this submission:

- To protect, represent and further the interests of New Zealand screenwriters.
- To be the national and international voice of New Zealand screenwriters.
- To establish, maintain and improve minimum conditions of work and rates of compensation for New Zealand screenwriters.
- To promote policy, legislation, and legal and economic rights for the benefit of writers, including the issues of copyright, moral rights, and status of the artist.

[1] www.nzwg.org.nz

STRATEGY ON THE TABLE

NZWG has been actively involved in strategy consultation with and for the New Zealand Government since 1976. In recent years, this investment of time and resources into consultation has created rich

resources for Ministers and their departments to draw from.

Below are resources that highlight research and potential solutions to elements within the draft strategy:

1. Skills in the creative sector[2] – A report by Shamubeel Eaqub for Toi Mai Workforce Development Council on the education and training needs of the creative industries.

2. Screen Sector Strategy 2030[3] – strategically aligned with Amplify, see: Three-Year Plan Initiatives including government investment, modernising regulation, education & training from page 19.

3. Toi Mai Workforce Development Council – education and workforce training see: Toi Paho, Workforce Development Plans Onset / Crew[4] (page 197) and Above the Line[5] (page 34). NZWG's Executive Director is one of the Toi Mai's Co-Chairs.

4. Combined Screen Guilds Submission[6] to Treasury – Living Standards Framework – Value of culture, in all its forms, as a wealth and wellbeing indicator for society and economy.

[2] Skills report PDF Download: https://toimai.nz/wp-content/uploads/2025/09/Skills-in-the-creative-sector-report.pdf

[3] Screen Sector Strategy PDF Download: https://screensectorstrategynz.wordpress.com/wp-content/uploads/2020/08/aotearoa-new-zealand-screen-sector-strategy-2030-final-august-2020.pdf

[4] Te Waoo Nui o Toi – Below the Line WDP PDF Download: https://toimai.nz/wp-content/uploads/2024/10/Te-Wao-Nui-o-Toi-ToiPaho-WDP-screen.pdf

[5] Te Wao Nui I Toi – Te Waha o Tāne | Above the Line WDP PDF Download: https://toimai.nz/wp-content/uploads/2024/10/Te-Waha-o-Tane-ToiPaho-WDP-screen.pdf

[6] Submission to Treasury PDF Download: https://cdn.prod.website-files.com/6657baa1880112d6adcaf91e/66bd6ab5a69a240f26979873_Combined%20Screen%20Guilds%20Submission%20Wellbeing%20and%20the%20Living%20Standards%20Framework%20Dec%202021.pdf

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

NZWG supports an objective that enhances both prosperity and quality of life. To ensure the TES is relevant for screen and creative industries, the Objective and Priority 2 should expressly recognise cultural and creative innovation, as well as intellectual property (IP) creation and monetisation, as outcomes alongside productivity.

The strategy needs to better capture the value of project-based, collaborative work typical of screenwriting, and avoids the pitfalls of relying solely on GDP-per-worker metrics. This recognition ensures that cultural richness, social cohesion, and creative expression are treated as essential elements of wellbeing, not secondary benefits.

Creative work generates economic, social, and cultural value that is not always captured in GDP per worker metrics. Screenwriting and the wider creative economy are proven drivers of innovation, IP generation, and cultural identity.

We recommend adopting a STEAM framing (embedding the Arts within STEM) to strengthen cross-disciplinary innovation capacity, as is increasingly common internationally.

NZWG recommends explicit recognition that innovation includes cultural and creative innovation, and that quality of life encompasses cultural richness, social cohesion, and creative expression.

The objective should embed the Amplify Strategy, particularly the Nurturing Talent pillar, to ensure alignment with existing government commitments.

We would like to point out two areas across the entire strategy that have real world implications for screenwriters and those working in the screen sector:

- Terminology: Current framing of “employment,” “qualifications,” and “industry” excludes freelancers, portfolio workers, and creative practice. TES should explicitly recognise self-employment, contract-based, and project-based models as valid workforce outcomes.

- Work-based Learning (WBL): Traditional apprenticeships don’t fit freelance, multi-employer screen work. TES must enable portable, production-attached models (writers’ rooms, shadowing, development internships, set/post attachments) with host-employer-of-record solutions.

Without this recognition, a significant proportion of the screen workforce risks being invisible to TES monitoring, undermining both accuracy and policy effectiveness.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

We agree with the identification of technological change, demographic shifts, and evolving learner expectations.

Although TES underplays how AI and digital platforms are reshaping creative industries, changing business models, and global platforms are reshaping screen work into portfolio careers that mix freelancing, contracting and micro-credentialled upskilling.

TES should balance qualifications with skill development, expand modular/work-integrated learning, and equip learners with curricula that reflect:

- Copyright / Intellectual Property (IP) protection measures within creation, management, and monetisation.

- Ethics of AI generated content, including cultural and social bias in training models.
- Human-led creation principles should be at the centre of the future of AI education.

Drivers should acknowledge portfolio careers, freelance and project-based work, and the global digital platforms that mediate creative industries.

Response measures must include portable work-based learning models and funding mechanisms that enable project-attached traineeships in screen and other creative fields.

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

Yes, Te Tiriti o Waitangi and the Crown's obligation to support and service Māori in partnership is not evident in the design and construction of this draft strategy. It is the hole within the heart of this strategy.

Yes. NZWG supports the sector-wide recommendation from WeCreate to add a sixth priority: Cultural and Creative Innovation.

This would explicitly recognise the creative sector's contribution to economic growth, cultural wellbeing, and global influence. Alternatively, all five priorities should be expanded to incorporate creative innovation, not just technological or scientific domains.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	The strategy is heading in a positive direction, but risks undervaluing creative outcomes if metrics remain too narrow. TES must expand beyond traditional measures of completion and employment outcomes. It should embed recognition of freelance and self-employment as legitimate career outcomes, including indicators such as commissioned or optioned scripts, broadcast or streaming credits, festival selections and awards, time-to-next-paid engagement, IP creation and commercialisation, and creative business start-ups. These indicators better reflect the project-based nature of screenwriting careers, where success is measured through cumulative credits and contracts rather than a single employer relationship.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	We welcome the positive emphasis on work-based learning (WBL), Industry Skills Boards (ISBs), and AI. However: • Portable WBL models. Traditional apprenticeship-style models do not suit freelance, project-based screen work. The TES should explicitly enable portable, production-attached traineeships (e.g., writers' rooms, development internships, shadowing, on-set/post attachments) with clear host-employer-of-record solutions. • Clear ISB coverage. The governance framework should clarify that screen sits within the Creative and Technology industries portfolio (within the relevant ISB), reflecting shared and overlapping roles and skills (e.g., VFX, post-production, virtual production). • Entrepreneurship & IP. Entrepreneurial education and IP commercialisation capability are essential for screenwriters and should be treated as core—not optional—elements of provision. • Measure distance travelled. "Distance travelled" is particularly relevant in screen, where learners enter via diverse pathways and success unfolds cumulatively and non-linearly. TES indicators should capture credits, commissions, and repeat engagements—not only completions and single-employer outcomes.
Do you have suggestions for additional activities to support this priority?	Additional activities to support this priority: 1. Fund structured industry mentorships (writers' rooms, shadowing, commissioning attachments) co-designed with guilds and production companies. 2. Embed career navigators within guilds and industry partners to support underserved learners into sustained freelance/project work. 3. Adopt flexible completion models (pause/resume; recognition of learning in live productions) that align with creative project cycles and portfolio careers. 4. Track portfolio outcomes (first paid credit, time-to-next contract, option/commission

	rates) alongside traditional employment measures.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	While traditional industries are valuable, the creative economy is a major driver of innovation and exports and requires the same recognition. Screenwriting generates high-value IP and cultural identity. The current TES framing overemphasises employer pipelines and underplays IP-based entrepreneurship. For screenwriters, the most valuable contributions often emerge through the creation, ownership, and commercialisation of intellectual property, which drives both export revenue and cultural influence. To be effective, TES must therefore treat creative entrepreneurship, rights management, and IP commercialisation as core pillars of innovation and economic growth
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	As currently drafted, the examples largely support "mainstream" vocational training. What's missing is an innovation design that reflects Aotearoa New Zealand's unique cultural, social, and economic strengths. We suggest: • Universities: Embed creative practice research and STEAM-based curricula; strengthen pathways for IP creation, ownership, and commercialisation, with dedicated support from technology transfer offices for creative IP. • Wānanga: Recognise Wānanga as central to Māori creative-economy growth, sustaining mātauranga Māori-led curricula and indigenous research in screen/story disciplines. • Polytechnics: Provide sustained capital and operating investment in modern screen facilities (e.g., virtual production

	stages, editing labs) and industry-linked delivery across regions. • PTEs: Support quality assurance and innovation in PTEs that are highly responsive to creative industry needs, including short-cycle, stackable provision. • ISBs: ISBs must have the mandate, capability, and resourcing to engage directly with industry and ensure that advice to TEC is actioned. Clarify ISB coverage for Screen to avoid split governance (creative vs technical) that would fragment qualification pathways and investment signals. • Government agencies (TEC, MoE, NZQA, MBIE): Build in-house creative-sector expertise, align funding settings with IP-based entrepreneurship, and enable flexible investment in project-attached training and micro-credentials.
Do you have suggestions for additional activities to support this priority?	1. Fund ISBs adequately to undertake labour-market analysis, planning, qualification advice, and standards-setting at a quality comparable to the former WDCs. 2. Require TEC to formally consider ISB advice for vocational design and investment decisions, ensuring authentic industry voice. 3. Strengthen creative R&D and commercialisation: incentivise university–industry collaborative research beyond traditional STEM; require commercialisation offices to support creative IP and rights-based ventures. 4. Introduce a production-linked training contribution (e.g., levy/incentive top-ups) to co-fund screen traineeships, drawing on UK/Ireland practice. 5. Fund micro-credentials in AI-assisted production workflows, narrative design, and virtual production, stackable into larger qualifications. 6. Create a Creative Economy Skills Advisory Group to complement ISBs with cross-sector expertise and continuous horizon scanning. 7. Co-fund industry-designed micro-credentials (writers' rooms, showrunning, narrative design) with guaranteed cohort intakes. 8. Expand paid WIL with screen companies (development rooms, set/post, distribution/marketing placements). 9. Establish a Creative IP Commercialisation pathway linking universities, PTEs, incubators, and the screen sector (prototype-to-pilot-to-market).

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	The key to enabling a broader range of New Zealanders to access fulfilling learning and working lives lies in addressing cost barriers, creative-specific infrastructure needs, and equitable regional delivery. Creative learners often face disproportionate financial barriers—such as costs for equipment, software, and portfolio development—that are not typically accounted for in mainstream education funding. Without targeted support, these barriers perpetuate inequities
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	The current framing omits cost barriers and creative-specific infrastructure needs. Without explicit measures, participation risks will persist. It also presumes the delivery system remains largely unchanged—one reason many creative industries have disengaged from traditional models. Re-establishing and regionalising polytechnics requires modern screen facilities (e.g., virtual production stages, editing suites) and current industry practitioners as tutors. While federated regional polytechnics are an opportunity to embed screen hubs and industry-linked delivery, creative learners face disproportionate financial barriers (equipment, software, portfolio/production costs). Neurodivergent learners, tangata whaikaha, and learners from lower-income backgrounds face the steepest barriers to entry and persistence in the mainstream system.
Do you have suggestions for additional activities to support this priority?	1. Regional polytechnics should embed screen hubs and industry-linked delivery—with nationally consistent quality and shared access to specialist facilities. 2. Targeted scholarships and hardship grants to cover equipment, software, and portfolio/production costs; include assistive technology and accessibility supports. 3. Stackable micro-credential pathways in creative fields that ladder into

	diplomas/degrees and recognise prior learning from industry projects. 4. Mobile and pop-up training delivery attached to regional productions and creative precincts, with travel/accommodation supports where needed. 5. Wrap-around participation supports (pastoral care, flexible timetabling/online options, childcare/transport subsidies) for equity groups.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	Collaboration is essential for the screen sector, which is inherently project-based and team-driven. The TES should explicitly acknowledge that creative-sector collaborations are freelance- and micro-enterprise-led, rather than traditional employer-led, and design mechanisms accordingly (writers' rooms, project consortia, co-productions).
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	To fully support this priority, NZWG seeks firm commitments to: • Kaupapa Māori and te reo Māori-led provision, co-designed with iwi and Māori creative leaders. • Strengthened access for disabled learners, including accessible delivery and assessment design. • Creative-industry retention tracking, capturing freelance and portfolio-career outcomes over time.
Do you have suggestions for additional activities to support this priority?	1. Creative cluster partnerships connecting providers with creative precincts, production companies, and regional film offices. 2. A NZ-wide Screen Skills Partnership (ISBs, providers, guilds, agencies) to co-design standards, placements, and micro-credentials.

	3. International creative exchanges and residencies (room-to-room, lab-to-lab) to build global networks and practice. 4. Iwi and Pacific creative partnerships that honour indigenous creative practices and governance, with shared IP arrangements. 5. Shared facilities and makerspaces across institutions, with common booking systems and portable access credentials. 6. Credit-transfer and co-teaching frameworks (joint appointments between industry and providers) to smooth learner pathways.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
NZWG Comments	International students in screen bring cultural exchange, alumni networks, and long-term economic and diplomatic value. However, as demonstrated during the Covid-19 pandemic, over-reliance on international enrolments to fund creative programmes had long-term detrimental effects, with many training organisations forced to close. A sustainable TES must balance international education with secure domestic funding models.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	International education can strengthen innovation (Priority 2) through global knowledge exchange, support regional hubs (Priority 3) via demand and partnerships, and deepen integration and collaboration (Priority 4) through joint programmes and co-productions. International students also bring cultural exchange, enduring alumni networks, and long-term diplomatic and trade connections. To be sustainable, growth should be balanced with domestic capability, student experience, and integration into New Zealand's screen ecosystem.
Do you have suggestions for additional activities to support this priority?	1. Develop a creative-education export strategy that highlights New Zealand's distinct strengths (indigenous storytelling, world-class post/VFX, virtual production, narrative design). 2. Establish alumni networks and venture links to maintain connections with

	international graduates (co-development funds, festival/alumni showcases). 3. Co-fund international collaborative projects between students and industry (shorts, pilots, writers' rooms in residence) with clear IP frameworks. 4. Market New Zealand as a creative-innovation destination—not just a scenic location—emphasising our indigenous stories, collaborative culture, and cutting-edge production technologies. 5. Quality and wellbeing safeguards: track learner experience, pastoral care, and graduate pathways into NZ's creative industries, avoiding over-reliance on international fee income.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	Integrate research-led creative practice with industry collaboration; credit transfer with micro-credentials; research commercialisation for creative IP, along with embedding the STEAM approach to learning.
Wānanga	Critical institutions to Māori creative economy growth. Sustain kaupapa Māori provision, indigenous research, and place-based partnerships in screen/story disciplines (mātauranga Māori-led curricula, te reo Māori content).
Polytechnics	Vital for creative industries skills training. Require sustained investment in screen facilities and industry-linked delivery.
Private Training Establishments (PTEs)	Often provide flexible, industry-responsive and cutting-edge creative training. Should be supported to maintain quality while serving the creative sector's diverse needs. Need recognition of their role in creative entrepreneurship development.
Industry Skills Bodies (ISBs)	Must be as responsive to industry needs as WDCs have been. The narrowed focus and reduced funding for ISBs compared to WDCs is a concern for our sector, as it risks weakening the industry's ability to shape qualifications, training investment, and workforce planning. For the screen sector, ISBs must also embed Screen Industry Workers Act (SIWA) principles—ensuring learners are prepared for fair contracts, safe working conditions, and sustainable career.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	All agencies should develop in-house creative sector knowledge and expertise. The agencies need to align signals, simplify approvals and monitoring; TEC to incorporate distance-travelled and relevance metrics; NZQA to fast-track micro-credentials; MBIE to link

	science/innovation funds to creative R&D; ENZ to connect international cohorts to NZ creative work..
Other (please specify)	Establish a Creative Economy Skills Advisory Group to complement ISBs.

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

NZWG supports the broader monitoring framework, but current metrics risk undervaluing creative careers unless they are expanded to include creative-specific indicators.

For example, measuring graduate success by employment rates alone overlooks freelance achievements such as script commissions, screen credits, or start-up ventures. These outcomes should be recognised as valid measures of success in creative field.

Suggested additional indicators:

1. percentage of graduates with first paid screenwriting or creative credit.
2. Number of commissioned/optioned scripts post-graduation.
3. Creative start-up and IP commercialisation rates.
4. Graduate retention in the screen sector, including freelancers.
5. Diversity retention across screenwriting cohorts.
6. Funders/guild satisfaction with placement quality.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

NZWG appreciates the TES intent but urges explicit recognition of Cultural and Creative Innovation as a priority. The TES must be able to enable portable, project-based work-based learning models best suited to the screen sector.

NZWG welcomes the clarity on delivery roles and monitoring. To unlock genuine innovation and quality of life, the TES should explicitly value creative capability, cultural innovation and IP, operationalise SIWA-aligned practice via ISBs, and measure what matters for portfolio careers in the screen sector.

Alignment with Amplify is essential to deliver on Cabinet-backed commitments.

Ultimately, success depends on recognising creative industries not as peripheral, but as core drivers of innovation, exports, cultural identity, and national wellbeing. This requires aligning TES with existing government strategies such as Amplify and ensuring coherent cross-agency support for the creative economy. NZWG stands ready to contribute sector expertise to make this alignment real

We look forward to working with MoE to enable this strategy, for strong outcomes for our industry and those that learn and work within it.

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New Zealand Government

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	Open Polytechnic of New Zealand
Organisation category (please indicate):	Polytechnic (including divisions of Te Pūkenga)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @openpolytechnic.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The draft objective — *"A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life"* — is well-framed and appropriately ambitious. It recognises the dual imperative of economic growth and broader social outcomes. The explicit focus on innovation, productivity, and quality of life is supported.

Recommendation:
Ensure the objective is inclusive of all learner cohorts, especially Māori, Pacific peoples, disabled people, and those from under-served communities, and that it reflects the importance of lifelong learning and adaptability.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

The identified drivers — *technological change, evolving student expectations, fiscal constraints, global competition, demographic change, and persistent disparities* — are accurate and relevant. The system's response should prioritise flexibility, equity, sustainability and scalability of provision and responsiveness to both national and regional needs.

Recommendations:

- Strengthen the system's ability to respond rapidly to technological disruption (e.g., AI, digital skills) whilst bridging the digital divide and improving digital literacy of underserved populations (Māori, Pacific and remote regions).
- Address regional disparities and ensure rural and regional learners have equitable access.
- Embed Te Tiriti o Waitangi principles and support for Māori and Pacific learners throughout the strategy.
- In relation to fiscal constraints, strengthen the focus on financial sustainability and scalability of providers to foster a resilient system, including consideration of targeted investment.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

The five priorities — *Achievement, Economic Impact and Innovation, Access and Participation, Integration and Collaboration and International Education* — are comprehensive. However, consider:

- Explicitly recognising sustainability and climate adaptation as cross-cutting themes.
- Further elevating the role of lifelong learning and micro-credentials to support workforce adaptability.
- Mechanisms to strengthen the financial sustainability and scalability of providers to foster a resilient and responsive system that scale up or down with changes in domestic demand.

- Strengthening the focus on the digital divide and digital literacy, particularly of underserved populations, to create a prosperous workforce that is resilient to technological disruption.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	Raising achievement, especially for underserved groups, is essential. The focus on "distance travelled", "value add" and employment outcomes is welcome. **Suggestion:** The Achievement priority specifically references achievement of qualifications whilst the description of the priority acknowledges that a more nuanced understanding of success is required with a greater focus on "distance travelled" or "value added". This should be reflected in the wording of the priority. It is suggested that the wording is expanded to achievement of skills and knowledge through achievement of courses and smaller units of learning.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Agree
Comments	To effectively support the achievement of this priority, the following changes are **suggested**: Whilst the focus on "distance travelled" and "value add" is welcomed, metrics should be very carefully formulated with providers to align with their learner cohorts and educational settings, as some learners come with more privilege and stamina than others, and not all learners seek a full qualification. It is important that measures do not disadvantage those institutions genuinely engaging with learners who "continue to face significant barriers to success". The example of providers demonstrating "evidence-based approaches to learner success that are appropriate to their learner cohorts and educational setting, including by identifying and addressing risks and barriers to retention,

	achievement, completion, and employment" should be strengthened as an expectation rather than an example.
Do you have suggestions for additional activities to support this priority?	To effectively support the achievement of this priority, it is **suggested that the following activities are added:** Invest in targeted support for Māori, Pacific, and disabled learners. Support providers to implement evidence-based retention and achievement strategies.

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	Aligning tertiary education with labour market needs and innovation is critical for the future of Aotearoa | New Zealand. **Suggestion:** A strategy for changing models of education ought to be explicit. The current campus-based, timetable-driven model of education needs challenge. The 'Technical change' and 'Global trends and pressures' identified on p. 6 fail to bring these two factors into a serious engagement of how education is offered. Attention should be given to overseas models, such as those used by mega-universities, to bring about more available, inclusive, scalable, and sustainable education models that better align with the TES priorities. It is not enough to suggest that "sector leadership on artificial intelligence and its impact on tertiary education" is an example of Innovation; it ought to be a deliberate part of the strategy.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Agree
Comments	To effectively support the achievement of this priority, the following changes are **suggested:**

	Further emphasis should be placed on innovation by challenging the incumbent model of education.
Do you have suggestions for additional activities to support this priority?	To effectively support the achievement of this priority, it is **suggested that the following activities are added**: Strengthen partnerships with employers, iwi, and industry. Support research commercialisation and entrepreneurship. Ensure Industry Skills Boards have strong sector representation and influence.

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	Removing barriers to participation is vital for equity and economic growth. We strongly support the draft strategy's emphasis on lifelong upskilling and re-skilling, including right-size learning, agile and responsive delivery models and more accessible work-based learning and quality online provision. **Suggestion:** The priority statement should have a stronger focus on access to lifelong learning which supports the statement that learners "will need to build resilience, adaptability and an ability to continually upskill throughout their careers" (page 6). The priority statement should recognise the value of national provision in supporting access to quality education. The priority statement should recognise how the digital divide and lack of digital literacy can limit access and participation, particularly for underserved populations.
To what extent do you agree the expected changes and contributing	Agree

activities will effectively support achievement of this priority.	
Comments	To effectively support the achievement of this priority, the following changes are **suggested:** The expected changes and contributing activities should recognise the role national provision plays in enabling access and participation. The role of national provision by institutions such as Open Polytechnic needs to be recognised and well served by the strategy, particularly given the 'anchor' role it will play across an ITP Federation starting 2026 (mentioned p. 12). If regional and rural communities are to be well-served, a national reach giving local opportunity should be specifically incentivised and not simply be considered the mechanism to "rebuild a sustainable network of regional polytechnic provision" (p. 13); the 'network' might be better served by an extension to centralised, scalable online and extramural provision. New Zealand's largest ITP is regional only by extension. The "agile and responsive delivery models" to complement courses "that are the right size, delivered flexibly, and that enable people to earn and learn while in formal education and training" mentioned in p. 12 are not possible without significant changes to institutional operating models and incentive. The "shorter, cumulative options for students" (p. 12) are not as cost-effective than are larger courses leading to more substantial qualifications, so need to be incentivised and access to funding for them simplified. The Tertiary education strategy should align with the Secondary education strategy and pathways from secondary to tertiary should be clear and provide learners with multiple ways of attaining high level skills and knowledge.
Do you have suggestions for additional activities to support this priority?	To effectively support the achievement of this priority, it is **suggested that the following activities are added:** Incentivise flexible, agile and responsive online, and work-based delivery models. Rebuild regional polytechnic provision supported by national, centralised, scalable provision.

	Ensure the funding system supports a regional network and does not penalise providers with low enrolments in times of high employment when there is increased work-based delivery and ITPs are shut out of work-based funding. Strengthen secondary-tertiary pathways and alignment between the Secondary and Tertiary strategies. Provide targeted financial and pastoral support for underserved learners. Reduce the digital divide by improving digital literacy, particularly for underserved populations.

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	Collaboration across providers, employers, iwi, and communities is essential for system coherence and impact.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Agree
Comments	To effectively support the achievement of this priority, the following changes are **suggested**: Strengthen integration and collaboration within the ITP sector leveraging institutions' distinctive strengths and capabilities, including innovation in delivery models under the Federation structure. Collaboration is to be incentivised through appropriate changes to the regulatory and funding settings.
Do you have suggestions for additional activities to support this priority?	To effectively support the achievement of this priority, it is **suggested that the following activities are added**: Incentivise joint initiatives and shared infrastructure. Deepen partnerships with iwi and Māori organisations.

	Foster international research and education collaborations. Strengthen collaboration within the ITP sector under the Federation structure. Review funding settings to foster and support collaboration.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	Agree
Comments	International education is important for economic and cultural reasons, but growth must be sustainable and aligned with quality standards.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	This priority needs to be supported by matching long-term immigration policy to be realised and effective. Immigration settings often appear to operate independently to other government strategies. This priority should not solely be represented in terms of "markets" with targets only expressed in terms of revenue. There are other ways to general fiscal ease for the sector, such as challenging the incumbent baseline model of campus-based, timetable-driven education.
Do you have suggestions for additional activities to support this priority?	To effectively support the achievement of this priority, it is **suggested that the following activities are added**: Prioritise student experience and wellbeing. Ensure international education supports broader TES priorities, including research and workforce development. Monitor and manage risks associated with rapid growth. As feasible, ensure goals align with long-term immigration policy. International learners on provider-based programmes who are studying whilst on a work

	permits should pay the same fees as international learners who are on work-based programmes.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	Along with a national provider and Federation structure, Polytechnics are being re-established as regionally focused institutions delivering continuing education that meets local community, and industry needs and supports vocational upskilling and re-skilling. They will engage in applied research and work with Māori communities to improve outcomes. Polytechnics will be expected to strengthen regional access, respond to skills needs, seek opportunities for sector integration and collaboration, and deliver flexible, employment-focused learning.
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	TEC and NZQA both have a significant role to play in achieving the goal of collaboration across the tertiary education sector. To achieve collaboration requires there to be matching arrangements for both the funding and regulatory environments that support collaboration.
Other (please specify)	

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

The proposed monitoring framework is robust. The following improvements are suggested:

- Develop intermediate and secondary indicators for each priority.
- Include qualitative measures (e.g., learner voice, employer satisfaction).
- Ensure data is disaggregated by region, ethnicity, and learner group.

- The key success measure for Achievement states “Higher completion rate and better employment outcomes”. This could be interpreted as course completion rates or qualification completion rates. Both should be measured.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

Alignment to the Education and Training Act 2020

There is disproportionate emphasis on economic growth and a softening of other statutory goals outlined in the Education and Training Act 2020. The TES should reflect a balanced approach that incorporates social, cultural, environmental and individual wellbeing as central outcomes alongside economic objectives. The TES should support learner wellbeing and equitable outcomes, especially for Māori and other underserved groups so as not to exacerbate existing disparities and weaken focus/support for vulnerable learners. Importantly, the Act also requires the tertiary education system to honour Te Tiriti o Waitangi. This includes supporting Māori aspirations, enabling tino rangatiratanga in education, and ensuring equitable outcomes for ākonga Māori. The draft TES must be strengthened to appropriately meet these expectations.

Investment aligned with strategy

A strategy that emphasises the importance of tertiary education’s contribution to economic growth and future prosperity must be supported by a proposition where economic growth can be the consequence of both effort and investment. Effort is implicit in the strategy, the commitment to investment is not and it is recommended that it be referenced as part of the strategy.

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Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

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Submitter details

Full name	9(2)(a)
Organisation name	University of Otago - Ōtākou Whakaihu Waka
	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • **University** • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	None
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @otago.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

Ōtākou Whakaihu Waka, the University of Otago, welcomes the development of a new Tertiary Education Strategy (TES). It is an important element of Government's long-term policy framework for the sector, aligned with objectives of addressing national productivity challenges and improving the lives of all New Zealanders.

We welcome the strategy's recognition of the tertiary sector's pivotal role in driving economic growth and prosperity and – for the first time within a TES – significant recognition of the research role of universities. Universities are central to a prosperous future for our nation, whether it is producing highly skilled graduates, generating new knowledge and driving innovation, or contributing to exports through international education.

Alongside this economic focus, the broader social and cultural contributions of universities should not be overlooked. These contributions have their own intrinsic value, as well as being deeply interconnected with economic outcomes. For example, many graduates pursue careers in public service, cultural or charitable sectors — areas that may not be measured in direct economic terms but have profound impacts on health and wellbeing or the cultural life of the country. Similarly, whilst research and innovation that enhances productivity is crucial, the impact and reach of university research, across a wide range of discipline areas, often extends far beyond simple economic metrics.

At the University of Otago, an example that highlights this well is the Dunedin Study[1], which for over 50 years has shaped research, health policy and practice in New Zealand and internationally. Its success has not been driven by economic imperatives, yet its benefits to society have been immense. Another example of this wider role is the global soft power and influence universities have through our alumni, and our research links and partnerships. This is intrinsically valuable, contributing to New Zealand's reputation and standing in the world.

Our view is that an overly narrowly economic lens risks missing vital opportunities that can contribute to economic and social wellbeing. As the TES is finalised it could benefit from being clearer about the range of opportunities and benefits provided by tertiary education, even if the primary focus remains an economic one.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Overall, we agree with the drivers and challenges identified in the document. These are well understood across the tertiary sector, and institutions are already actively developing responses. At the University of Otago, many of these themes are reflected in the goals of our strategic plan to 2030, *Pae Tata*[2].

[1] The Dunedin Study - Dunedin Multidisciplinary Health & Development Research Unit
[2] Official documents | University of Otago

It is essential that the TES provides a framework that supports diverse strategic responses, rather than prescribing a one-size-fits-all approach. As noted below, the contributions of different providers will also be shaped by their regional roles, stakeholder needs, and areas of strength.

While we acknowledge the current fiscal constraints, universities and tertiary providers should be viewed as investments in the country's future—not merely as costs. Ensuring value for money and efficiency is important, but the broader social, economic, and individual returns could be more explicitly recognised in the strategy.

The TES provides an important and helpful framework for guiding strategic direction for all involved in tertiary education. However, it is broad ranging and there will be limits to how universities and others respond and what can be achieved in what is currently a constrained financial context. It will be important for the final version of the TES to signal more clearly what is most important in the immediate, medium- and longer-term horizons to help guide prioritisation.

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

We broadly agree with the priorities identified in the TES.

A theme that could be more strongly recognised across the priorities is the essential place-based role and contribution of universities and tertiary providers, which will be crucial in realising the strategy.

Universities are often among the largest employers in their regions, significant purchasers, attractors of inward investment, and generators and facilitators of enterprise. For example, the University of Otago's most recent economic impact report shows $2.07 billion in total value was added to the country's economy last year by the university, and 7,954 full-time equivalent (FTE) jobs were supported. The greatest impact was in Ōtepoti Dunedin, where the University contributed an estimated $1.31 billion towards the local economy (15% of the city's Gross Regional Product). Combined with this direct expenditure, partnerships with local businesses and stakeholders, and start up and spin-out activity act as powerful drivers for innovation and growth and are important to health and social wellbeing of communities.

Many of the challenges outlined in the strategy will differ across the country, and so too will the responses required from tertiary education and its partners to address these. A clearer recognition of this regional dimension would also help to better acknowledge this.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

Priority 1: Achievement

- To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy: **Strongly agree**
- To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority: **Agree**
- Do you have suggestions for additional activities to support this priority?

Comments

Overall, we support the goal and the contributing activities outlined in this priority. At the University of Otago, many of these are already reflected in our own strategic priorities, in our Learner Success Plan (LSP) and the Disability Action Plan.

Measuring learner progress from their starting point is a valuable aim set out in the TES's contributing activities, but it presents significant challenges in terms of developing reliable and valid measures—whether directly or via proxy indicators. These measures of 'distance travelled' (often referred to as learning gain) are complex, contested, and vary significantly across disciplines. Given the potentially significant costs involved in developing reliable approaches we recommend first reviewing and drawing on work done on this internationally[3] to avoid duplication and to help scope an appropriate approach for a New Zealand context.

Whilst supportive of the development of employment outcomes measures, we would caution against overly simplistic metrics that equate success solely with salary outcomes. As noted above, the value of tertiary education extends well beyond simple or narrowly defined economic indicators. Furthermore, salary outcomes are to a significant extent defined by factors outside of a universities' control, such as where people chose to work, fields they work in and economic conditions (including regional variations).

We would welcome a joined-up framework for monitoring and reporting across these and other areas of the TES that reflects the student journey.

Priority 2: Economic Impact and Innovation

- To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy: **Agree**
- To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority: **Agree**
- Do you have suggestions for additional activities to support this priority?

We broadly support the focus and approach outlined in this priority. The references to university-based research as a component of the strategy are very welcome. We would reiterate our earlier comments that focusing too narrowly on economic outcomes risks overlooking other important opportunities and impacts. As the strategy develops, we encourage a more explicit

[3] For example, the pilot studies by the Higher Education Funding Council for England

acknowledgement of the broader roles and interdependencies, across the spectrum of academic disciplines, that define the full value of the tertiary sector.

We welcome the emphasis given to knowledge transfer that benefits both the economy and society. However, unlocking wider benefits through knowledge transfer may be in tension with the push for universities to prioritise commercialisation and income generation. At present these are given equal emphasis in the list of contributing activities. As the strategy plays out it is important that the development of intellectual property and commercialisation approaches and policies do not lead to an inadvertent limiting of the wider impacts and benefits of university-led research and innovation.

We would like to see a greater emphasis on the importance of people in relation to knowledge transfer. Increasing mobility between academia and industry (in both directions) and opportunities to align post-graduate and research training to industry needs will be critical to success.

Achieving these goals, and the related parallel changes to the science system, requires ongoing dialogue about how we build capability and what types of interventions will drive meaningful change. For example, countries such as Australia and the UK have dedicated investment funds to support capability building in knowledge transfer and commercialisation in universities. These investments have delivered a step change in knowledge transfer and strong returns[4].

The focus on strengthening sector leadership on artificial intelligence in the contributing activities is welcome. Universities, including Otago, are already progressing in how to realise opportunities, support responsible use and manage risks, but this is a fast-moving area that will require agility and joined up approaches at the sector level. We welcome the government's recently published *New Zealand Strategy for AI: Investing with Confidence*[5]. It is important that the TES more clearly acknowledges and demonstrates the connections with this given the significant overlaps.

Priority 3: Access and Participation

- To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy: **Strongly agree**
- To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority. **Agree**
- Do you have suggestions for additional activities to support this priority?

Expanding opportunity through access and participation is a critical part of the strategy.

The emphasis on secondary-tertiary pathways is welcome, but progression within the tertiary system appears to be largely absent from the strategy. Creating opportunities to progress through the tertiary system to build and acquire higher level skills and qualifications- including funding to

[4] The UK's Higher Education Innovation Fund, for instance, has demonstrated a return of £8 for every £1 invested
[5] New Zealand's strategy for artificial intelligence: Investing with confidence

support this (such as student loans and maintenance support)- will ensure we are not putting constraints on people's educational journey and opportunity.

The focus on creating more blended and flexible options is important but we need to avoid this becoming supply side driven. There must be a clear understanding of where the demand and opportunity is and how tertiary organisations, industry and other partners can work collaboratively to meet this. ISBs will have an important role to play in this regard, working closely with tertiary education organisations, including universities.

Improving access to tertiary education can be challenging. It requires significant financial resources, which are currently constrained, and alignment of policies and approaches across government and other parts of the education system. Part of the solution will be a more strategic emphasis on collaboration in access and participation to avoid all organisations trying to do the same things and to overcome competition where this acts as a barrier. For example, this might include increased collaborative outreach to priority under-served communities and better sharing of evidence and evaluations on what works.

We believe that there is a continued need to provide support for learners who are under-represented or not traditionally represented in universities in particular Māori and Pacific learners, and learners with disabilities. This requires a specific focus and additional resources to support strong outcomes for these learners.

Priority 4: Integration and Collaboration

- To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy: **Strongly agree**
- To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority: **Agree**
- Do you have suggestions for additional activities to support this priority?

We have made several proposals for more integration and effective collaboration above and would refer to those.

The University of Otago is committed to exploring new collaboration opportunities that help improve better outcomes for our university, the communities we serve and New Zealand. Most recently we have signed a statement of intent with Victoria University Wellington and Auckland University of Technology on enhanced collaboration[6].

We welcome the importance placed on partnership between tertiary education providers and hapū and iwi as critical to supporting Māori development aspirations and honouring Te Tiriti o Waitangi. We believe this should be given greater emphasis throughout the priorities identified in the strategy. The University of Otago has recently signed a Mana-to-Mana agreement – Te Kaha Uia Te Kaha – which affirms our commitment to further deepening and strengthening our relationship

[6] Strengthening collaboration between New Zealand universities | University of Otago

with mana whenua in the Otago region[7]. This agreement provides a solid foundation for partnership and underpins our commitment to becoming a Te Tiriti-led university.

Priority 5: International Education

- To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy: **Strongly agree**
- How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities? **Agree**
- Do you have suggestions for additional activities to support this priority?

We support the overall strategic approach outlined and recognise the vital role international education plays in New Zealand's future. While it is a significant export and income generator, we wish to re-emphasise that its value should not be defined solely in narrow economic terms. The benefits of international education extend far beyond financial metrics — contributing to New Zealand's soft power, diplomatic relationships, cultural enrichment, and global standing.

To further support this priority, we recommend the continued monitoring on public sentiment toward international education. The lesson from Australia and elsewhere underscore the importance of maintaining social licence for international education. We would encourage a collaborative approach involving government, tertiary education and other relevant stakeholders to ensure sustained public confidence and engagement.

The emphasis within TES on quality and sustainable growth in international student enrolments is important and will be a vital component of maintaining social licence. However, we suggest the examples of contributing activities be broadened to more explicitly recognise the importance of supporting the wider international student experience, including the provision of pastoral care. Understanding and proactively managing implications for local communities, such as the impacts on housing availability, will also be an important part of the strategic response.

System Delivery

4. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	In line with earlier comments, we emphasise the need for the TES to provide a framework that supports diverse strategic responses, rather than prescribing a one-size-fits-all approach. The contributions of different providers will be shaped by their own strategies, regional roles, stakeholder needs, strengths and areas of impact. There is scope for greater collaboration between universities,

[7] The agreement was signed between the University and Te Rūnanga o Ōtākou, Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Moeraki, known collectively for the purposes of this Agreement as 'Kā Rūnaka ki Ōtākou'.

	that emphasises unique capabilities while also respecting institutional autonomy.
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	In line with earlier comments about place and regional collaboration we would suggest that partners should also include local government, regional development bodies, and industry organisations

Monitoring Outcomes

5. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

We would welcome clarity on how TEC funded organisations will be required to demonstrate/set out their own plans for giving effect to the strategy, and be monitored, and how this relates to existing reporting requirements (e.g. the Statement of Service Performance and reporting for the LSP). Any requirements and monitoring should be light touch and proportionate, drawing on existing data and monitoring as far as possible.

Different institutions have different missions, strengths and challenges. Qualification completion rates are highly lagged and are better used to reflect the performance of the sector rather than individual institutions. The current approach of using common sector-level KPIs directly for each institution should be altered to allow custom KPIs for each institution that will demonstrate how they impact the sector level outcome-based indicators. This will give greater flexibility for demonstrating the diverse contributions tertiary providers will make. As noted above, it is important that the TES does not drive a one size fits all approach.

A joint sector-agency work programme is recommended to develop an appropriate measurement framework.

Final Comments

6. **Do you have any other comments on the draft Tertiary Education Strategy?**

No additional comments.

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Submitter details

Full name	9(2)(a)
Organisation name	Otago University Students' Association
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • **Student association** • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) *@OUSA.org.nz*

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**
While we note that the draft objective places less emphasis on equity, we consider this formulation to be an improvement on previous versions.

We support an objective that centres education as a public good, not just a tool for workforce supply. The objective should explicitly commit to equity, Te Tiriti o Waitangi, student wellbeing, and supporting lifelong learning. Further, students should be presented as partners rather than consumers or customers.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**
We believe that the chief drivers of change in tertiary education are demographic change, technology and global pressures. However, we are concerned that the principal driver of change in modern tertiary education is underfunding. Cuts to courses, staff redundancies, and higher student fees are harming access and education quality.

The system must respond by reinvesting in public tertiary education, embedding Te Tiriti, addressing inequality for Māori, Pasifika, and disabled students, and making study affordable by reducing student debt burdens.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**
The TES should further include:

    1. Student wellbeing and affordability as a priority.
    2. A climate justice focus, ensuring tertiary education helps New Zealand transition to a sustainable future.
    3. A commitment to protecting student and staff voice in university decision-making.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree
Comments	**Yes, but achievement should not be narrowly defined by completion rates or employment outcomes. True achievement includes equity across demographics, student wellbeing and the development of student capacities and competence.**
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree

Comments	
Do you have suggestions for additional activities to support this priority?	**Expanding understanding to a more holistic understanding of student achievement.**

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	**We believe that economic impact and innovation should be considered but would reject a narrow or solely financial assessment of impact.** **Economic impact should also be understood alongside social, cultural and environmental innovation.**
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	There is not enough focus on public-interest research.
Do you have suggestions for additional activities to support this priority?	

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • Agree • Neutral • Disagree • Strongly disagree
Comments	Access is fundamental to the long-term health of Universities. However, the strategy underplays the role that finances play in creating barriers to education such as student debt, high cost of living, cuts to regional education providers.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • **Disagree** • Strongly disagree
Comments	The proposed changes will not succeed without direct action to reduce the cost of study and support students' basic needs.
Do you have suggestions for additional activities to support this priority?	

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • **Agree** • Neutral • Disagree • Strongly disagree
Comments	Collaboration can be of signidicant benefit to students, but should be balanced amongst a wide array of partners such as iwi, hapū, NGOs, local communities.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • **Neutral** • Disagree • Strongly disagree
Comments	**International education is important but should not be considered as an export**

	business. Students are people, not revenue streams.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	If done equitable, it can enrich collaboration and broaden participation. But if driven by profit motives, it risks undermining access and wellbeing for both international and domestic students.
Do you have suggestions for additional activities to support this priority?	

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	Need to be funded to prioritize teaching and research for the public benefit, not forced into corporate behavior.
Wānanga	
Polytechnics	Need stability and investment in regional delivery rather than constant restructuring.
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	Should embed students and staff unions in governance and accountability mechanisms.
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

The TES must set a clear vision of tertiary education as a right and public good. This draft is too focussed on productivity and economic growth. An improved strategy would centre equity, climate justice, student wellbeing, cost, and democratic accountability, backed by significant reinvestment in public tertiary education.

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Submitter details

Full name	9(2)(a)
Organisation name	Primary ITO on behalf of the Food and Fibre Sector (permission has been granted for me to share the TES with them)
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
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Executive Summary

We welcome the strategic direction being signalled, especially the focus on economic impacts – growth and productivity, and the proposed outcome-focused performance measures and "enhanced indicators" – "distance travelled" and value-added impacts including employment outcomes.

However, there are inconsistencies in how this promising strategic focus is detailed throughout the draft TES which undermine the above. Further to this, the "changes in the next five years" and the descriptions of the priorities are underwhelming, lacking clearly stated solutions and impacts.

For example, while we support the priorities there is a lack of clarity and unambiguous impact and outcome focus in the descriptors. These read more like process and input statements.

For the food and fibre sector, more alignment with our capability development and productivity requirements from the education system and agencies giving effect to

- **the importance of work-based learning and well-supported employer-led learning,**
- **funding and regulatory settings overhaul,**
- **efficient and flexible development and approval of new products,**
- **an enhanced and appropriately funded skills leadership role for ISBs (e.g. in determining and supporting networks of provision for industry),**
- **building trust in the system with employers, learners, industry and communities.**

Lastly, we are deeply disappointed at the “targeted approach” and supply-side dominance of the consultation on the next TES – this has deepened trust and engagement issues.

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

We support the objective and the discussion on economic growth and the pivot in the next TES to addressing productivity, innovation and the importance of a broader skills system.

We strongly agree that a skilled and adaptable workforce is essential to achieving the aspirations framed by the objective both domestically in Aotearoa NZ and to enable NZ businesses to compete and grow globally.

It is vital to recognise the scope and responsibility of tertiary education to support flexible learning options at all career stages – lifelong learning and across the education value chain – and for it to be closely connected to employers and industry.

It is also good to recognise that the economic focus not only benefits the economy but will also support Government's wider social and environmental goals and people's aspirations.

To this end industry and employers would appreciate a tertiary education system that "walks the talk" and gives effect to this objective with real purpose – that builds a system that works in true partnership with industry, Māori, and employers.

Further, a good start would be to address the imbalance between the needs of higher education institutions and vocational education delivery (especially work-based learning) evident and overt in this draft of the next TES.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

The analysis of the challenges and modern drivers of demand and change is helpful and to the point. The pressing challenges identified are valid but are expressed with a predominantly higher education and a provider-led solutions are emphasised but not the responsibilities of agencies.

The challenges facing NZ's economy and the tertiary education system are urgent and critical. They require a bolder approach to building the tertiary system the country requires – this needs to start with this TES and rethinking the system inputs and partnership building from the stewardship agencies.

The mixed messages about outcomes focused versus managing and controlling inputs undermine the objective.

NZ needs tertiary education solutions that address the high levels of skills-mismatch and the changing nature of work and workplace requirements.

It would be useful to recognise that our workforce is ageing and needs fresh thinking about education products across lifespans and the educational value chain:

- digital literacy and other new competencies,
- innovative and flexible delivery to ensure skills remain relevant for future workforce demands
- a strengthened approach towards pathways and outcomes rather than just course and qualification completions.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

- We support the priorities as a package and individually.
- However, clarity and unambiguous impact and outcomes statements are needed to reinforce intent.
- The descriptors underneath read like process and input statements and give mixed messages about what is the priority.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments However, achievement needs to be redefined to focus on outcome-focused performance measures and "enhanced indicators" – "distance travelled" and value-added impacts including employment outcomes. These should be the lead indicators.	Course and qualification completions are highly limited in providing information about education effectiveness and/or provider performance in a broader system performance view. They need a rethink as to how to use this data.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments Agree <u>but</u> note that only two of the examples of contributing activities are outcomes focussed. All the rest are compliance-driven inputs, not the best strategy for embedding behavioural and pedagogical change	These are worthy pedagogies and operational strategies which need to be incentivised in a more constructive fashion otherwise compliance will trump outcomes. Also note that strong pathways are mentioned in the objective but not the contributing activities as a highly effective operational and system-level approach.
Do you have suggestions for additional activities to support this priority?	Eliminate counter-productive compliances such as: - recording non-completions when learners secure employment in industries related to their training - recording withdrawals when trainees change employers but continue with another employer in the same or similar industry

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments **Long overdue!!** <u>But</u> redefine the focus by identifying the lead outcome indicators	which will drive the desired system changes more effectively than the improved input exhortation used here.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments Good operational strategies suggested here for higher education and two excellent **agency stewardship** suggestions to build connections with employers and industry and rethink the system inputs around funding, products and planning.	
Do you have suggestions for additional activities to support this priority?	**Be bold** – an overhaul of funding and regulatory functions to align with this priority. - eliminate lag at all levels of the system!!

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments Again, redefine the focus – this time from an input message to a statement of agency and provider accountability for making this happen.	Otherwise, it remains a mixed message with no impact.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments The input conversation in this area are positive, if tentative steps. Emphasise the stewardship role of agencies in devising system inputs to achieve this priority e.g. overhauling the funding and regulatory framework.	
Do you have suggestions for additional activities to support this priority?	

- Rebuild nationally co-ordinated and sustainable networks of workplace-based learning for industries. - Think about school to work pathways rather than secondary-tertiary pathways – much more outcome inducing! - Create the right incentives for providers, employers and learners. - The volume-based funding model is not fit for purpose for encouraging access and participation or the new measures & indicators. - address the importance of ongoing on-job learning.	

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments Again, redefine the focus – this time from an input message to a statement of agency and provider accountability for making this happen.	
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments There are some good operational strategies suggested. The real challenge will be incentivizing and enabling them. These require greater agency from the agencies to build the collaborations and partnerships that will underpin this priority.	
Do you have suggestions for additional activities to support this priority?	- Build new products and pathways around the workplace. - Enhanced workplace learning is likely the most impactful approach for productivity and innovation gains.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments Strongly agree but not in the way it is being used to avoid bold decisions around the funding system. The focus statement needs to be redefined to outcomes that benefit NZ's economy and workforce capability.	At present it is not a good benefit message to providers, employers and potential international students about the intent of this priority. It is cynically commercial, and input focused.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	By redefining the focus onto outcomes that benefit NZ's economy and workforce capability. - Use it as a strategy for productivity gains, especially with transformative technologies.
Do you have suggestions for additional activities to support this priority?	The contributing activity statements provide no outcomes or NZ workforce benefit approaches. INZ's Green List could be modified to better target productivity as well as key industry skill shortages.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	What impacts, outcomes and value are they expected to deliver to give effect to this TES?
Wānanga	What impacts, outcomes and value are they expected to deliver to give effect to this TES?
Polytechnics	What impacts, outcomes and value are they expected to deliver to give effect to this TES?
Private Training Establishments (PTEs)	What impacts, outcomes and value are they expected to deliver to give effect to this TES?

Industry Skills Bodies (ISBs)	- Government needs to enable real industry leadership of these bodies, not the watered down and filtered version currently on offer. - What impacts, outcomes and value are they expected to deliver to give effect to this TES? - Clear performance measures for effectiveness in addressing skills mismatches. - Comprehensive labour market analysis that extends beyond work-based learning. - Strong connections between ISB planning and broader vocational education networks of provision. - Ensure TEC and NZQA will act on advice given by the ISB. - Adequate resourcing to match their workforce planning and skills leadership responsibilities including the functions listed above.
Relevant Government Agencies (e.g., TEC, MoE, NZQA, MBIE)	Rethink their stewardship roles and their use of the system levers they have to give effect to the strategic direction being signalled, especially the focus on economic impacts – growth and productivity, and the proposed outcome-focused performance measures and "enhanced indicators" – "distance travelled" and value-added impacts including employment outcomes. The most important levers are funding and regulatory. At present these are antithetical to achieving the gains being proposed in the next TES.
Other (please specify)	1. Work-based Learning and ongoing upskilling and on-job learning are glaring omissions from this list. 2. Employers and industries may not be provider-based institutions but they have a vital role to play in the delivery of strategies to enhance productivity and innovation.

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

The key success measures (lead indicators) should be the proposed outcome-focused performance measures and "enhanced indicators" – "distance travelled" and value-added impacts including employment outcomes. This includes the comments about the International priority above.

Progress can be monitored by designing system-level indicators which cover key outputs such as collaboration and partnerships, and integration between stakeholder groups (e.g., Māori, , key export industries, communities, businesses, science and technology sectors) and tertiary education.

At the provider level redesign the current output indicators and design new indicators to align with the system-level monitoring suggested above.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

The scale of NZ's productivity challenge requires bold changes.

The draft strategy supports the Government's commitment to economic growth through tertiary education reform. The draft strategy provides the makings of a roadmap through an outcomes-focused foundation that, with the recommended enhancements, could lead toward the meaningful system impacts needed.

For the food and fibre sector to be able to double its export value the current system settings and vocational reforms will not suffice. Agrifood sectors are crucial to this government target, and they have real growth potential.

This needs to be enhanced through a TES strategy that delivers a tertiary education focus on economic impact and growth. Tertiary education is critical to delivering skilled workers for key export industries in the food and fibre sector.

What food and fibre seeks is a tertiary system in alignment with our capability development and productivity requirements from the education system and agencies giving effect to

- the importance of work-based learning and well-supported employer-led learning,
- funding and regulatory settings overhaul,
- efficient and flexible development and approval of new products,
- an enhanced and appropriately funded skills leadership role for ISBs (e.g. in determining and supporting networks of provision for industry),
- higher education and research sectors that put value ahead of volume,
- building trust in the system with employers, learners, industry and communities.

We need a comprehensive transformation that examines not only what providers do but also how government agencies, funding mechanisms, and regulatory frameworks can better support responsive, innovative education delivery and ongoing on-job upskilling.

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Te Kāwanatanga o Aotearoa
New Zealand Government

QTI Submission on the 2025 Tertiary Education Strategy

Quality Tertiary Institutions (QTI Nga Wananga Kounga)

QTI is an industry peak body representing PTEs operating at scale. QTI members offer a wide range of courses throughout New Zealand to well over 95,000 domestic and international students. As a group, QTI members receive 40% of all TEC funding for the PTE sector. QTI members teach 50% of all higher education programmes, 40% of vocational programmes and 25% of foundation programmes delivered by PTEs and funded by TEC. QTI members teach a large and diverse range of qualifications including micro credentials and apprenticeships, and from foundation, certificates and diplomas, through to degrees and postgraduate qualifications. All QTI institutions are student-focused and committed to excellent learner outcomes, and are committed to quality education and training in New Zealand.

This submission provides feedback drawing on our members' direct experience and the collective expertise of our network.

Introduction

The draft TES appears to be dominated by the needs of higher education, which detracts from a necessary overall focus on improving the way the tertiary sector—at both degree and sub-degree levels—delivers productivity, keeps pace with technology and learner needs, and improves the match between the supply of tertiary education and the needs of employers.

QTI agrees that economic growth and productivity should be the overarching objective of the TES, but a balanced approach that also addresses social and community needs is essential. We believe the TES should chart a more visionary path, rather than reverting to past models, and actively reflect on the roles of government agencies themselves in achieving the strategy's objectives.

TES Strategic Direction - Objective

A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.

QTI supports the refocusing of the TES on all sectors of tertiary education producing graduates that have the knowledge and skills to advance innovation and productivity. Only in this way will the quality of life for all New Zealanders improve. At a time of ongoing significant change in the tertiary education sector coupled with low or negative economic growth, our major concern is to ensure that this objective remains non-political and receives

support from political parties across the spectrum. To fully implement this objective and the priorities within it, tertiary education organisations (TEOs) need stability and confidence that the government's macro settings for investment plans over the medium to long term will not change along with a change in government.

Along with innovation, productivity and quality of life, equity and social justice could be added as objectives to the TES. This would point toward the need for the tertiary education system to serve all sectors of society, and would support the access and participation priorities as well as promoting a political consensus on the TES.

Drivers of Change in Tertiary Education

Technological Change

Digital tools and AI are transforming how people learn and work. Therefore, including this item as a driver of change in the draft TES is appropriate. PTEs respond to this driver in many ways including by offering adaptable, flexible learning options.

However, their ability to quickly adapt their programme content and delivery models can be hampered by slow NZQA approval processes or TEC inability to adapt strategic priorities to facilitate technological change in teaching and learning, student or industry demand. Greater government flexibility in following market indicators identified by PTEs and other TEOs is needed for this driver to reach its full potential.

The TES should also recognise that these changes are fundamentally disrupting all workplaces and how education is delivered and assessed, not just at the degree level. Learners are expecting their education to be delivered in new ways.

Student Expectations and Career Patterns

PTEs' flexibility and industry-focused approach allow them to adapt more quickly than larger, public institutions to student expectations and career patterns. This driver of change is a fundamental element of the PTE business model. Having it explicitly included in the new TES is acknowledgment that the clients we serve are the students, something that can be easily mistaken in the compliance-heavy tertiary education eco-system.

A major omission from the TES is mention of the need for graduates that have globally competitive skills and knowledge, and that enable NZ companies to compete globally. The fact that many of our graduates do seek employment overseas should not be a deterrent to promoting NZ qualifications as being globally competitive.

PTEs are responding to evolving student expectations through flexible and accessible learning, online and blended learning, shorter, modular courses, personalised support, strengthening industry connections, and expanding work integrated learning. While all these

responses align with the draft TES, their implementation is often stymied by slower government responses, bottlenecks or lack of understanding at the regulating agencies including NZQA, TEC, INZ.

Fiscal Constraints

Rather than fiscal constraints being a limiting factor, QTI supports an approach where fiscal constraints make government more responsive to TEOs, including PTEs, that efficiently deliver meaningful outcomes for students and trainees, communities and the economy, and maximise the value of international education. The draft TES signals this as an opportunity. The success of this collaboration depends on a funding and policy environment that is responsive to TEOs that demonstrate efficiency and deliver strong, measurable outcomes.

Historically, the relationship between the government and TEOs has often been one of compliance, with funding tied to meeting a series of prescribed inputs and outputs. The draft TES signals a shift towards a more outcome-focused approach. For this to work in a financially tight climate, the government needs to become a more agile and responsive partner with innovative funding models that directly reward providers for achieving excellent student outcomes, such as high completion rates for under-served learner groups, successful employment transitions, or the development of a skilled workforce in priority areas.

Streamlining administrative and reporting requirements would free up resources that could be better spent on teaching, student support, and programme development. A responsive government would trust providers to manage their resources efficiently while holding them accountable for high-level results. Instead of one-size-fits-all policies, funding decisions could be informed by a nuanced understanding of a provider's performance, student demographics, and regional needs. This would ensure that public investment is channeled to the most effective and impactful institutions.

The success of the TES is directly linked to New Zealand's economic future. By being more responsive to efficient providers, the government can maximise value for money, reward high-performing providers that creates a virtuous cycle of improvement across the sector, and unlock growth in international education by working closely with TEOs that have proven track records in attracting and supporting international students. A responsive government would use policy levers and investment to support these providers in their efforts to grow this under-performing export sector. This requires significant change in the way funding is currently allocated.

Global Trends and Pressures

QTI supports inclusion of this item as a driver for the draft TES. Most directly for the TES, this relates to the global competition for skills and talent, and the attendant reality of workforce

shortages in NZ. PTEs are particularly well-suited to respond to these challenges due to their ability to react quickly to market and industry demands and develop and launch new courses or programmes more rapidly than larger institutions. PTEs' smaller size, more agile nature and exposure to industry can help them build resilience and turn these challenges into opportunities. But they can only do this with the full support of government agencies that to all intents and purposes determine the speed of response to meeting market demands.

Demographic Change

In every country demographic change demands a response in education provision. QTI supports the need to lift achievement for all groups, particularly for those under-served by the education system, and the need for higher overall skill levels to sustain productivity growth and support equitable participation in economic and social life.

PTEs are at the forefront of responding to this demographic driver of change. Their unique position allows them to be flexible and innovative in serving the needs of an increasingly diverse student population. Many PTEs specialise in vocational and applied training that can be tailored to the specific needs of diverse communities. PTEs have a proven track record of offering flexible and accessible modes of learning. This is crucial for reaching under-served learners who may have significant work or family commitments. By offering online, blended, and part-time options, PTEs can remove common barriers to participation and ensure that education is available to those who need it most. PTEs excel at providing practical, job-focused training and work integrated learning that leads to direct employment outcomes. By working closely with employers, they ensure that their graduates, regardless of their background, possess the skills and confidence to succeed in the modern workplace.

Priorities for this Tertiary Education Strategy

QTI agrees with the stated priorities. We especially agree with including international education as a priority in order to give all-of-government support to regulatory changes and initiatives that support growth in this sector. An additional priority could be the wellness of people and their communities, to support the draft TES intention to ensure that the system continues to deliver on its broad social, cultural, and economic objectives.

1. Achievement

QTI agrees with achievement as a priority. Qualification completion is likely to remain a base metric for learner and provider success well into the future even while they are a blunt instrument.

Strengthening the link between tertiary education and employment outcomes is also crucial. By requiring providers to embed labour market relevance and track graduate employment, the TES encourages a shift from credentialing to genuinely preparing students for the

workforce. This is a vital component for ensuring that education leads to economic security particularly for groups that are disproportionately affected by poor economic outcomes.

The TES commitment to lifting achievement for under-served groups needs to continue. Currently, Māori, Pasifika, and disabled students are less likely to complete their qualifications. The proposed changes, such as improving first-year retention and building on existing approaches to learner success, are good starting points. Foundational learners require a realistic and achievable pathway or staircase that extends beyond initial qualifications to include work experience and sustainable employment. By focusing on developing soft skills and employment readiness over a longer period, this approach can lead to a more productive economy by reducing job turnover and increasing long-term workforce attachment.

The proposal to develop new or augmented EPIs that measure 'distance travelled' or 'value added' is positive, as blunt counts of qualification completions have limited value in delivering information about education effectiveness. TEOs would benefit from consistent and consolidated national data and insights to understand which pathways are performing effectively.

QTI Suggestions for Additional Activities

While the draft TES provides a good framework, QTI would recommend several additional activities to further support the "Achievement" priority.

- **Flexible Funding for Tailored Support:** The TES encourages providers to build on existing approaches, but a more flexible funding model would enable more innovative, tailored support. QTI recommends a portion of funding be allocated to a contestable fund for PTEs to pilot new, culturally responsive programmes or student support services. This would encourage innovation and allow for the rapid scaling of successful initiatives.
- **Strengthening Work Integrated Learning with Financial Incentives:** The document refers to changes that will enable more providers to move into work-based learning. QTI recommends providing specific financial incentives to employers who partner with PTEs to offer meaningful work integrated learning opportunities, particularly for under-served learners. This would not only improve employment outcomes for students but also strengthen industry connections across the sector.
- **Improving Tutor Capability and Deepening Understanding of Diverse Learning Needs:** Now that Ako Aotearoa has been de-funded, there is a need to create a funded mechanism for continuously improving tutor capabilities across all sectors, subjects and levels. This creates a base for NZ education to be world-class and to support high achievement levels.

- **Recognising staircasing as a critical achievement measure:** This will incentivise providers to design clear, supported progression routes and invest in wraparound services that enable underserved learners to move successfully into higher-level, labour market relevant qualifications, rather than pushing them into any form of employment for the sake of meeting a TEC measure. Recognising this journey as an achievement in its own right ensures the public investment is aligned with equity goals while still driving towards long-term employment outcomes.

These recommendations aim to build upon the strong foundation of the draft TES by providing concrete, actionable suggestions that leverage the agility and community connections of PTEs to improve educational achievement for all New Zealanders.

2. Economic Impact and Innovation

QTI strongly agrees with economic impact and innovation as a priority. PTEs have various ownership models but they all exist in order to have economic impact and to serve their communities through their graduates. But economic impact needs to be also tied to socially just flourishing communities, where all New Zealanders are able to learn and apply their skills and learning. This is because socioeconomic factors play a major part in not just students engaging and succeeding in the learning process, but also in retaining jobs afterwards.

The emphasis on work-based learning and the encouragement of new providers in this space is welcome. By expanding these opportunities, the system not only benefits students by providing them with real-world experience but also strengthens the crucial feedback loops between providers and employers.

The expected changes and contributing activities outlined in the draft TES for this priority are generally well-conceived and address some of the most significant challenges facing NZ's tertiary education system. However, there is an evident bias toward universities in much of the language of the contributing activities. PTEs and ITPs also deliver degree and postgraduate programmes, and engage in research. It is the agility of PTEs that allow us to serve the needs of communities more closely in ways that attend to a variety of needs and opportunities - not just economic. Unlike universities and ITPs, PTEs are not locked into a monolithic institutional model and can more directly engage with how learners in communities wish to pursue multiple goods.

QTI Suggestions for Additional Activities

- **Recognise that PTEs ensure the diversity and innovation of New Zealand's tertiary sector:** PTEs operate at an efficient scale, meeting the needs of distinct communities and pursuing innovation through investing in diverse models of higher education in ways that universities cannot. This recognition would involve creating further

opportunities for PTEs to engage in innovation, research and specialist higher education in ways that innovate alongside university provision.

- **Support PTE Research and Commercialisation:** On the research front, the focus on knowledge transfer, user-initiated research, and stronger commercialisation functions is essential for increasing economic value and improving NZ's innovation performance. PTEs should not be discouraged from engaging in this user-initiated research. Their connections with industry are often better than universities' and the private sector instinctively understands commercialisation where universities may be weighed down in bureaucracy.
- **De-link TEC Funding from Investment Plan Over-Achievement:** Too often TEOs are restricted from meeting student and industry demand by TEC and legislative requirements. Yet for economic impact and innovation to be a serious target for the TES, the government needs to reward Investment Plan over-achievement where TEOs are being innovative and meeting market demand. A solution is needed here.

3. Access and Participation

QTI strongly agrees that access and participation should be a priority in the TES. This is a foundational element for a robust and equitable tertiary education system. The ability to provide education and training to all New Zealanders, regardless of their background or location, is essential for addressing skills shortages, lifting economic productivity, and ensuring social inclusion. However the wording of this section seems to emphasise only ITPs, where PTEs and all other TEOs need to contribute.

While the intent to create clear pathways and support regional provision through a sustainable network of ITPs is commendable, it is crucial that this does not come at the expense of other providers, particularly PTEs, who have a proven track record of reaching and effectively serving under-represented groups. Greater flexible learning options are required, but a barrier exists where the WDC has been blocking some campus-based extramural delivery, which is not financially viable in smaller regions with low intake sizes. Allowing high-quality providers with sector-leading success in extramural delivery to offer increased options would be beneficial.

The expected changes noted in the TES are a good step, and the emphasis on more agile and responsive delivery models, including quality online and blended learning options, is particularly effective. PTEs have been at the forefront of this kind of innovation, and the TES correctly recognises that this flexibility is key to accommodating the diverse life circumstances and work arrangements of modern learners.

The focus on "right-sized" and cumulative options, such as micro-credentials, is also a positive development. It directly addresses the need for lifelong learning and makes it easier for people to upskill and retrain without committing to a full-time, multi-year qualification.

However the effectiveness of these changes will depend heavily on the implementation details. And if access and participation is to seriously improve, it cannot be done within the current funding system. For example, equity funding would need to be significantly increased, and greater availability of shorter, cumulative options with more accessible work-based learning would require additional funding.

4. Integration and Collaboration

QTI strongly agrees that integration and collaboration should be a priority for the TES. This will encourage a more cohesive and impactful system. PTEs, ITPs, universities and schools should all be working in partnerships that encourage learners through the staircase toward their desired career or learning outcomes.

Collaboration is the key to unlocking the full value of the tertiary education system. The draft TES correctly identifies that a fragmented system is inefficient and that deeper partnerships are required. The emphasis on strengthening regional collaboration between TEOs, employers, and iwi is particularly important. PTEs, with their strong local connections and agility, are well-positioned to contribute to this. However, the effectiveness of these changes will depend on moving beyond good intentions. The challenge is to shift from a mindset of sector competition to one of collaboration.

PTEs have grown into major organisations over the past 30 years and vocational education needs to be given parity of esteem with university education. “Quality” should not be measured by NZQCF level, and the government should not conflate “public” with worthy and “private” with unworthy. Learners continue to choose PTEs over universities for a reason and industry has a track record of working with PTEs at least as effectively as ITPs.

A key issue will be how collaboration will be funded when funding is currently individualised and hemmed in by fiscal restraints. The funding model requires changing to achieve this strategy. For example, will life-long learning programmes, which are not a current TEC priority be given funding? The same with microcredentials. Additional funding will be required to embed this priority.

In effect, a comprehensive review of operational policies, funding mechanisms, and rules is needed to create an environment that actively enables high-quality, flexible, and innovative provision.

QTI's Suggestions for Additional Activities

- **Formalising the Role of PTEs in Regional Development:** While the TES highlights the role of ITPs in regional provision, the draft TES should explicitly include PTEs in regional skills planning and provision where appropriate. This recognition would

ensure that PTE's on-the-ground knowledge and relationships are fully utilised to meet regional labour market needs.

- **National Framework for Credit and Pathway Recognition:** The draft TES mentions making it easier for students to move between providers and between provider-based and work-based learning. QTI recommends the creation of a national, sector-wide framework for the recognition of prior learning and the transfer of credits. This would be a game-changer for collaboration, as it would enable students to move seamlessly through the system, and it would encourage providers to work together to create clearer, more flexible learning pathways.

5. International Education

QTI strongly agrees that international education should be a priority in the TES as it enables an all-of-government approach to addressing the issues. The international education priority is deeply interconnected with and contributes to the other four TES priorities:

Achievement: A robust international education sector raises the bar for all providers. By attracting international students and competing on the global stage for talent at both degree and sub-degree level, TEOs are incentivised to enhance the quality of their programmes and support services. This elevates the overall educational experience, benefitting both international and domestic students, and ultimately improving completion and achievement rates.

Economic Impact and Innovation: International education is also a critical channel for providing skilled workers that have been acculturated and socialised through the NZ education system, have created local networks and have a better level of English language than workers directly employed from overseas. Not least, the revenue from international students allows TEOs to invest in better infrastructure, technology, and teaching staff, which in turn strengthens their ability to deliver relevant, adaptable skills that drive productivity.

Access and Participation: International students from diverse backgrounds enrich the domestic learning environment, providing NZ students with a global perspective and cross-cultural skills that are increasingly important in a connected world. The revenue generated from international education can also be reinvested to support domestic students from under-served communities, improving access and participation for all.

Integration and Collaboration: International education inherently requires collaboration - between providers and with international partners, agents, and governments. By working with these global stakeholders, PTEs and other TEOs gain valuable insights into international best practices, which can be applied to improve their domestic offerings. This collaboration also strengthens NZ's soft power and diplomatic ties, contributing to a more integrated and influential presence on the world stage.

QTI's Suggestions for Additional Activities

- **Vocational Parity with Degrees:** Currently post-study work visas favour degree graduates. As a primary driver of international student choice, this has succeeded in refilling the universities to pre-Covid levels. With the Going for Growth Plan aiming at $7.2 billion by 2034, this will require more than degrees to achieve. Vocational qualifications need to be given exactly the same post-study work visa settings as degrees in order to attract international students to this sector and achieve the target. PTEs and ITPs are well geared to accommodate these students, and NZQA has appropriate systems in place to ensure that rogue actors do not reappear and create social and political licence issues.
- **Flexible Policy Settings for Transnational Education (TNE):** The global market for education is changing, with an increasing demand for flexible, digitally enabled learning. QTI recommends that the government more actively support TEOs to offer high-quality TNE where New Zealand qualifications are delivered to students offshore, either online or in partnership with local providers. This would allow New Zealand to grow its international education sector without relying solely on students physically coming to the country.

Delivering the Strategy

Provider Roles and Expectations

As an advocate for PTEs, QTI has several comments on the roles and expectations outlined in the draft TES. The draft TES correctly acknowledges the diversity of the tertiary education system and the unique role each type of provider plays. QTI is encouraged by the recognition of PTEs as "highly responsive to learner, employer, and community needs". However, it is crucial that this recognition is translated into a policy and funding environment that enables PTEs to fully leverage their strengths, rather than being treated as an afterthought in a system centered on public institutions. As mentioned above, PTEs and ITPs also deliver degree and postgraduate programmes, and engage in research. The draft TES has a tone that appears to favour universities and higher education, with only occasional references to PTEs or ITPs in the vocational context. All TES priorities should apply equally and evenly to all TEOs. TES wording should be made more generic to achieve this.

Agency Roles and Expectations

The TES largely treats government agencies as disinterested observers, even though their policies and rules are often the primary barriers to delivering "just in time" education and training models.

The TEC's role in aligning investment with the TES priorities is critical. QTI urges the TEC to ensure its funding models are flexible enough to reward innovation and outcomes, not just

scale. TEC strategic investment priorities need to be more nimble to meet the market. Over-achieving investment plans should be seen as a sign of successfully filling student and industry demand - a sign of success rather than failure. A shift to incentives rather than financial penalties would go a long way to unlocking innovation and economic growth in the sector. The TEC should also continue to work to reduce the compliance burden for all TEOs, which can disproportionately affect smaller, more agile PTEs.

NZQA's role in ensuring qualification quality is paramount. NZQA needs to ensure that its processes for programme approval and quality assurance are agile enough to allow for the rapid development of new, relevant qualifications, such as work integrated learning degrees and micro-credentials. A slow or cumbersome quality assurance process can stifle the innovation that the TES aims to encourage.

QTI agrees with the expectation that all government agencies collaborate to reduce duplication and streamline processes. One glaring example of the opposite, is where NZQA approves new programmes which are then approved for funding by TEC, but TEC does not increase its funding allocation to the TEO for delivery of the newly approved programme. This leaves the TEO delivering the new programme with increased overheads and no additional government funding. Short of merging TEC and NZQA into a single government body with two arms - QA and funding, TEOs will continue to be caught between the respective and sometimes conflicting priorities of each organisation.

Government compliance continues to be a major cost and barrier to efficiency, innovation and TEO growth. Explicit integration of NZQA's iQAF and TEC's TREF into the TES would be highly beneficial as both of these have a monitoring intent. A TES that clearly integrates the many compliance requirements will go a long way toward identifying duplication and redundancy that can be removed.

Finally, the work of MBIE and ENZ directly impacts PTEs' ability to contribute to economic growth and international education. MBIE should accept that there is risk inherent in visa settings but that economic growth, innovation and productivity will more than compensate for the risk.

Conclusion

In summary, QTI believes the draft TES provides a good framework so long as it receives multi-party support and is given time to have real impact. The key to success will be to translate these high-level intentions into a practical, responsive, and equitable operating environment that fully unlocks the potential of every part of the tertiary education system, particularly the agile and innovative PTE sector.

The TES must address the accretion of government agency compliances and constraints that actively undermine positive system behaviours and impede TEOs from delivering the agile

and innovative education models that today's learners and employers demand. The goal should be to implement a new set of enabling policies and processes that drive high-quality, flexible, and responsive provision across the entire tertiary education system.

QTI is happy to provide further feedback if requested.

Best wishes

9(2)(a)

30 September 2025

RINGA HORA
Services
Workforce Development Council

Tertiary Education Strategy Consultation – Response

September 2025

Overarching comments

Thank you for the opportunity to provide input into the draft Tertiary Education Strategy (TES).

At a high level we agree with the overarching objective for tertiary education and the broad priorities as outlined in the TES. However, we have a number of concerns about how these priorities will be delivered, resourced, and measured. We believe there is a real risk that improvements will not be delivered for Service sector industries and businesses, vocational learners, and under-served communities. These concerns are outlined below.

1. Industry voice

The TES includes some heroic assertions about how Industry Skills Boards (ISBs) will improve industry voice in the tertiary education system. We believe this is a mammoth expectation for entities that do not yet exist, and will be funded at less than half the level of the WDCs, who currently hold the role of providing industry voice in the system.

2. Māori and Pacific learners

The TES acknowledges the barriers that Māori, Pacific and other under-served learners face in the system and the negative impacts this has on individuals and on the New Zealand economy, but has a diminished focus on how best to meet the needs of these learners when compared to previous versions of the TES. Māori and Pacific learners are no longer mentioned in summary material and have instead been replaced with language around access for "… people from all backgrounds…". The removal of explicit focus has the potential to diminish effort and attention on critical groups of learners.

3. Measuring of employment outcomes

The TES includes a stronger focus on labour market and employment outcomes which we welcome. But it also includes very little information about how these outcomes will be measured or tracked. We believe there should be explicit measurement of employment outcomes immediately after study and also in the years following. Relevance of employment or a similar measure should also be considered. A number of other countries have improved measuring of tertiary education by introducing national student surveys which is something we believe could strengthen and compliment existing measures. Further discussion of the benefits of such a survey and what it could look like are outlined in this recent article by tertiary education expert, Roger Smyth.

4. Broad skills and job-readiness

There has long been a narrative of the education system needing to deliver people with broad skills who are job-ready, and this is again reflected in the TES. However, there is little detail about how the system will change to encourage providers to deliver on these broad skills or focus on job-readiness. The current qualifications and funding systems are still structured around traditional knowledge attainment and volume of training, which is different to, and at times even at odds with, broad skills and work-readiness.

5. System flexibility and life-long learning

The TES outlines the importance of greater flexibility in the system and opportunities for life-long learning to meet New Zealander's changing needs. We support such flexibility but struggle to see how this will change given the current funding mechanisms, and the inherent disincentives for providers to make it easy for learners to move within the system.

6. Integration and collaboration

The TES outlines the need for much greater integration and collaboration across the tertiary system and beyond but focuses very heavily on universities, especially in terms of research and research-led teaching. In particular, examples of contributing activities almost all focus on higher education and research. While there is one paragraph on vocational education, it focuses mainly on connections with employers at a regional level, rather than better connecting vocational education into the rest of the tertiary education system.

Mahuru September 2025

Response to the draft Tertiary Education Strategy consultation

Royal Society Te Apārangi

Thank you for the opportunity to provide feedback on New Zealand's draft Tertiary Education Strategy.

Royal Society Te Apārangi is an independent, not-for-profit organisation, established with the statutory objective of advancing and promoting science, technology, and the humanities in Aotearoa New Zealand.

The Society recognises the critical importance of vocational education and the Tertiary Education Strategy in achieving New Zealand's aspirations. Given our remit and membership, we primarily focus on research and research-active organisations in these comments. We note that the views of our members and stakeholders are many and varied and we encourage wider consultation that would enable individual members and groups to make their own submissions.

One size does not fit all

Tertiary education and research form part of the 'ecosystem' that enables New Zealand to flourish and are major contributors to our prosperity and wellbeing. The Society is concerned about apparent contradictions within the draft strategy. On the one hand, there is an emphasis on economic growth, close connection to employers and industry, with achievement defined as leading to good careers and economic security with job-ready graduates. On the other hand, there is acknowledgement of the need for graduates to have transferable skills, critical thinking, contribution to foundational research and knowledge transfer, etc. These are not necessarily conflicting demands, but they do require different outcome measures and might reasonably be expected to differ in emphasis between different subject areas and institutions (e.g., universities vs providers of trade-based apprenticeships). The draft strategy does not acknowledge the need for differentiation within the sector and the outcome measures required, or that both are to be valued.

A high-performing tertiary education system needs to provide broad and deep expertise

Knowledge-rich and knowledge-led teaching and education are vital to ensure we stay at the leading edge of new global knowledge creation and innovation. This requires continuing investment in investigator-led discovery research, especially within universities. The Society notes and supports the desire to 'increase universities' focus on user-initiated research' in the draft strategy. Research not only delivers discoveries and new ideas in New Zealand, but importantly also enables the essential connection of New Zealand to knowledge across the much larger global research and innovation system. For example, to prepare for unpredictable challenges and opportunities in the future, such as

climate change mitigation and adaption, New Zealand needs to develop and retain deep multi-disciplinary expertise in the natural and applied sciences, technology and engineering, social sciences and humanities.

A high-performing tertiary education system needs stability

Universities and other tertiary education providers strengthen our society, advance knowledge, help preserve cultural heritage, and develop a skilled workforce that can contribute to productivity and wellbeing. New Zealand institutions have world-leading human capability and know-how in many areas of research and education that are essential to the country's wealth and wellbeing. A thriving tertiary sector that delivers positive sustainable growth and prosperity for New Zealand is a long-term endeavour and needs to offer sufficient certainty for the high-performing people and organisations working within it, especially if we want to attract and retain the world's best minds, and to offer the best outcomes for students. Expertise is much more easily lost than gained and we are a small country operating in open international labour markets – we cannot afford to lose our best and brightest. Care will be required in implementing the strategy in a fiscally constrained environment to avoid such unintended consequences.

Stability can be enhanced by seeking bi-partisan support for long-term strategy setting, ensuring that the connections between the Science, Innovation and Technology portfolio and the Universities and Vocational Education portfolios are well understood, and growing the investment into these portfolios over time. New Zealand is continuing to under invest in its research and innovation compared to other countries and it is unlikely that the aspirations of the strategy will be fully achieved without addressing that issue.

A useful example is the Marsden Fund for investigator-initiated research that is funded through the Science, Innovation and Technology portfolio but funds mostly universities. Recent and anticipated significant cuts in the Marsden Fund will materially affect universities over the foreseeable future and are counter-productive to achieving stability in the system and the aspirations set out in the draft strategy.

Comments on specific priorities

1. Achievement

In principle, we agree that achievement should be a strategic priority and support evidence-based approaches to ensuring learner success. We note that this will look different for different types of providers across the tertiary education sector. Overall, we envisage a well-aligned tertiary education system that will enable graduates to access rewarding careers, compete in domestic and international labour markets, and contribute to the prosperity, wellbeing, and cohesiveness of society.

2. Economic impact and innovation

It is important that any refocus of the tertiary education system towards economic outcomes does not come at the expense of our existing institutions and expertise, and does not treat the objective to 'improve quality of life' as an afterthought. Tertiary education and research are long-term endeavours that require a long-term strategy.

In addition to targeted vocational training, tertiary education needs to provide graduates with the skills to find and analyse information, formulate clear arguments, reflect on our past, and celebrate our vibrant culture. For a thriving society and economy, it is important that our institutions continue to nurture social sciences and the humanities (e.g., to ensure that New Zealand can properly respond to threats from climate change, maintains capability in foreign languages as part of national security considerations, and retains expertise in economics). This is especially important if we want to extract the most value from our tertiary education investment; after all, to build trust and social licence and

to fully realise the benefits of innovation and new technology, we need to understand how they impact our unique cultural and social landscape.

We note a potential contradiction in the encouragement of new providers to enter the tertiary education market, yet in the 'Integration and collaboration' section, there is concern about excess competition and insufficient collaboration. The strategy would benefit from an explanation about how these different demands might be addressed.

3. Access and participation

Tertiary education needs to be accessible to our diverse communities, who should all share the benefits of research and education. A well-aligned tertiary education system will enable graduates to access rewarding careers, compete in domestic and international labour markets, and contribute to the prosperity, wellbeing, and cohesiveness of society.

4. Integration and collaboration

To be effective, tertiary education providers need to be well connected to government, to Māori leaders and communities, to the private sector and industry, to New Zealand's diverse communities and to the global science and innovation ecosystem. Institutions need to be deeply connected with mana whenua and communities to co-develop research and teaching, and to empower mātauranga Māori. This extends to relationships with Wānanga and their special role across and within the tertiary education system. Universities must be incentivised to improve transitions for students between different stages of education – from schools into universities, from other education providers such as Wānanga, Institutes of Technology and Polytechnics into universities, between universities, and from university courses into teaching, research, or other sectors.

The existing competitive environment features non-productive competition for students and funding. Tertiary education institutions will need to work together to develop a balance between collaboration and specialisation. For example, a university with strong expertise in a particular area could collaborate with Public Research Organisations or Wānanga to fill gaps in course offerings or research training, enabling students to learn directly from the best scholars in the country.

5. International education

We recognise the value of international education as an export industry, and enabler of global connectivity and influence. However, shocks such as the Covid-19-related border closures show that we cannot rely on revenue from the international student market. The tertiary sector needs to be sustainably resourced, with diverse and complementary institutions that offer internationally recognised education and research. There are good reasons to invest in tertiary education and research, including positive economic returns on this investment.[1] Funding has not kept pace with costs, and institutions have been struggling to undertake their primary roles, which needs to be addressed for the sustainability of the sector in the long term.

In conclusion

People are at the core of a thriving tertiary education system. We need vision, strategy, and investment to drive our tertiary system and create an enabling environment for new ideas and a diverse, highly capable workforce that flourishes, and to meet the aspirations we have for the people and place that our tertiary system serves.

[1] OECD Education GPS. Public returns. https://gpseducation.oecd.org/revieweducationpolicies/#!node=41762&filter=all [Accessed 29 September 2025]

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	SANITI
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @saniti.co.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

Broadly agree on the draft objectives however it does not just need to enable people to succeed it needs to also 'inspire' people to engage and succeed.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Broadly agree on the drivers for change however there needs to be an additional driver. A driver to reduce student debt.

Current strategy recognises the benefits of higher education to the economy/society, for the TES to work, students need to see the value and be able to afford to engage in it.

Students need to be able to afford to live while they study, students need to not be burdened by debt that excludes them from purchasing a home, having a family, being able to save for their future/retirement.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

Yes, as stated above should include a strategy on how students will be able to afford to study and how student debt will be reduced.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Course completion is too narrow a measure of achievement. Individual papers, unit standards, micro credentials can provide students with the learning they need at that time.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments	Agree with identifying and addressing risks and barriers. One key risk and barrier is students being able to afford to study. Number one issue consistently identified by students is financial stress, this needs to be addressed as it impacts on all students but is especially challenging for under served groups. Examples, apprentices that cannot afford to take time off to complete block courses. Time is not covered by employers. Training allowances that students cannot live on. Unpaid placements and internships.
Do you have suggestions for additional activities to support this priority?	Include student affordability to undertake and continue with their studies as a risk and barrier. Increase financial support for students to study. It is not going to increase retention or completion rates if they cannot afford to continue to study. Have students input into the development and implementation of this strategy. Lived experience.

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Study programmes need to be relevant, aligned to employment opportunities, and include new technology. Employment opportunities available at the start of your study may not be there three-four years later. Qualifications need to be recognised and renumeration reflective of them, incur debt to gain qualification only to find that industry renumeration does not reflect the skills obtained.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments	Artificial intelligence and its impact on tertiary education need to be prioritised. How it is currently being managed within tertiary education is inconsistent, punitive, putting additional stress on students, and putting additional time and costs on to students' programmes of study.
Do you have suggestions for additional activities to support this priority?	Linkage between tertiary education sector, Māori economy and industry is key however there needs to be additional safeguards in place so that students are not abused and just used as free labour. Have students input into the development and implementation of this strategy. Lived experience.

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	More agile and responsive delivery models will benefit all participants and under-served communities. Minimising the time and costs for employers, students and workers to participate in education through programmes that are right size, delivered flexibly, and enable people to earn and learn. Support sustainable network of polytechnics to support the regional delivery, students need to be able to transfer between ITPs to complete their programme of studies with unified qualifications. Personal circumstances change, students are not retained in training if there are barriers put in place, and they are unable to continue their qualification in another region.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Students being able to afford to study and continue with their studies need to be identified and addressed as a key part of Priority 3: Access and participation.

Do you have suggestions for additional activities to support this priority?	Access to support between WINZ and StudyLink allowances needs to be addressed. Parental income threshold for allowance eligibility needs to be raised to allow more students to have access to allowances. Have students input into the development and implementation of this strategy. Lived experience.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Key to delivering better outcomes for students.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	There needs to be protections in place for students, apprentices, and workers.
Do you have suggestions for additional activities to support this priority?	Need input from students, apprentices, and workers in development of these initiatives.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	International students need to be supported and receive quality delivery. Not just seen as a 'cash cow'. Information provided to international students' needs to be accurate and be consistent for the length of their qualification. Too often the information provided by agents is not accurate,

	immigration settings change during the student's period of study i.e. green list. Quality of study programmes vary. Perception of bias in support and marking of papers.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	Complement the TES, not just seen as a 'cash cow'.
Do you have suggestions for additional activities to support this priority?	Have international students input into the development and implementation of this strategy. Lived experience.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	Agree with roles and expectations. There needs to be increased integration between universities so that students can move easily between providers.
Wānanga	Agree with role and expectations. It needs to be integrated so that students can move easily between tertiary education system.
Polytechnics	Agree with role and expectations. Need to meet local community and industry needs but qualifications need to be nationally unified so that students can move easily between polytechnics.
Private Training Establishments (PTEs)	Agree with role and expectations. Needs to be integrated so that students can move easily between PTE's and other tertiary education providers to complete or progress their qualifications.
Industry Skills Bodies (ISBs)	Agree with the value of industry knowledge, however apprentice and other workplace learners need protection in place as there is a clear power imbalance. Need to be able to continue their programme of studies if business can no longer support them to complete their qualifications.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	Government agencies need to recognise the financial and time commitment made by students, apprentices, and work-based learners. Finance them to have the ability to undertake and complete their studies and work together to achieve this goal.

Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

Final Comments

11. **Do you have any other comments on the draft Tertiary Education Strategy?**

Te Tāhuhu o te Mātauranga
Ministry of Education

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Te Kāwanatanga o Aotearoa
New Zealand Government

Comment on the Draft Tertiary Education Strategy

Introduction

Thank you for the opportunity to provide feedback on the draft new Tertiary Education Strategy for New Zealand (the Strategy).

Science New Zealand is the industry association for the Crown Research Institutes (CRIs), currently the Bioeconomy Science Institute (BSI), Earth Sciences New Zealand (ESNZ), and Public Health and Forensic Science (PHF Science). Science New Zealand will continue its role as the CRIs become Public Research Organisations (PROs) under anticipated new legislation. From here, we will refer to these organisations as PROs.

Science New Zealand's former CRI members (AgResearch, ESR, GNS Science, Manaaki Whenua Landcare Research, NIWA, Plant & Food Research, and Scion) were merged into the three new entities above. These members have been strong contributors to, and benefactors of, New Zealand's tertiary education system. PRO staff have been involved in the supervision of up to 600 PhD and Masters students per annum, with the latest numbers (2023) showing supervision and co-hosting of nearly 250 PhD students and 114 Masters students. This represents around 10% of New Zealand's total postgraduate students in the Natural and Physical Science, Agriculture and Environment (Education Counts). The PROs receive no dedicated funding to support this activity and have carried the cost due to its critical importance for New Zealand.

The PROs are also large employers of postgraduate students, with 1265 PhDs (2023) on their payrolls along with many other graduates. A long-standing concern of the PROs has been that New Zealand universities produce relatively few PhDs in areas where the PROs have the bulk of their expertise, such as agriculture and the environment. These organisations have had to look offshore for a significant part of their recruitment. While bringing in international expertise is useful, it would be ideal to have a greater number of postgraduate students directly familiar with the New Zealand situation. PROs have also been concerned that many postgraduate students (who haven't been co-supervised within PROs) are leaving university without the skills they need to be fully effective outside academia. We look forward to these issues being addressed through such initiatives as the Applied Doctorates Scheme and other initiatives raised in the draft Strategy.

Universities and PROs have more than 10 joint graduate schools, supporting students to address real world problems in their studies. These include the Joint Graduate School in Costal and Marine Science at the University of Auckland, in collaboration with NIWA (now part of ESNZ),[1] Food Transitions 2050 Joint Postgraduate School, between Lincoln University, the University of Canterbury and BSI,[2] and the University of Auckland's postgraduate programme in forensic science delivered in partnership with PHF Science.[3]

The PROs also collaborate closely with the universities on research. The significance of this collaboration is illustrated by co-authorship of publications, where universities co-publish at similar or greater levels with PROs than they do with other New Zealand universities.[4] Sub-contracting is also a common activity, where PROs contract between $40-50 million to

[1] https://www.auckland.ac.nz/en/science/our-research/jgs-coastal-and-marine-science.html

[2] https://www.foodtransitions2050.ac.nz/

[3] https://www.phfscience.nz/news-publications/shaping-the-future-of-forensic-science-phf-science-and-university-of-auckland-s-postgraduate-programme/

[4] Hendy *et al.* Analysing Scientific Collaborations of New Zealand Institutions using Scopus Bibliometric Data, https://www.researchgate.net/publication/319552932_Analysing_Scientific_Collaborations_of_New_Zealand_Institutions_using_Scopus_Bibliometric_Data

universities per annum and universities contract between $20-30 million per annum with the PROs.

Through the ongoing changes to the science, innovation and technology system, these organisations will continue to work closely with tertiary education providers to ensure that New Zealanders benefit from publicly funded research. Science New Zealand and Universities New Zealand have recently signed a Statement of Collaboration to help strengthen connections and work on priority issues together.[5]

Overall Comments on the Draft Strategy

Science New Zealand welcomes the call for tertiary education institutions to work more closely with the broader science and innovation system. However, we identify several critical gaps and areas for improvement, in particular:

- **Defining the role of tertiary institutes in research**: The Strategy should explicitly define the role of the tertiary education system in advancing science, innovation and technology through research. This research production role extends beyond the international and industry engagement outlined in Priority 4 and deserves specific recognition.
- **Broader benefits of tertiary education beyond economic**: While the current focus on economic benefits aligns with government priorities, a strategic document should take a longer-term view beyond the current political cycle. The Strategy assumes that social and environmental benefits will automatically follow from economic growth, but this needs more careful consideration. For example, ensuring investment in social and environmental education will continue alongside a strong economic focus.
- **University specialisation**: Rather than simply addressing the number of university institutions, the strategy could reframe this as supporting greater specialisation among universities. Enabling better stakeholder delivery and deeper, more strategic relationships with the PROs.

Discussions of Specific Priorities in the Draft Strategy Document

Priority 1: Achievement

We agree that Achievement should be a priority, with particular emphasis on ensuring the right people enter higher levels of tertiary education.

Additional contributing activity to achieve the goal:

- Greater use of research organisations outside universities as providers of end-user-based education, in particular building enhanced pathways that recognise PROs as significant training providers.

Priority 2: Economic Impact and Innovation

We support this priority, but we are concerned the strategy appears overly influenced by potentially short-term political priorities. We must avoid potential "whiplash" from overly rapid changes to the tertiary education system and instead adopt sustainable long-term goals to improve the wellbeing of New Zealanders.

Additional contributing activities to achieve the goal:

- Secure and maintain formal links between universities and PROs to jointly contribute to national science priorities that support innovation, advance economic growth and increase impact from public research investment.

[5] https://www.universitiesnz.ac.nz/latest-news-and-publications/new-era-public-science-collaboration

- Expand Applied Doctorate programmes and develop a wider range of skills at the postgraduate level to foster market-driven entrepreneurial capabilities.
- Include non-university providers like PROs in skills development initiatives.
- Establish an equivalent to Industry Skills Boards for professional sectors, giving PROs an annual opportunity to provide input on skill needs for sectors they service.
- Create a regularly updated synthesis of national skill development needs to align tertiary education providers' delivery with New Zealand's evolving economic requirements.

Priority 3: Access and Participation

We agree with this priority but disagree with the implication that increasing participation at universities is the key pathway to building relevant skills, particularly in the face of the development of AI. New Zealand already compares favourably with many OECD countries in tertiary qualification rates. We should consider what constitutes the "right" amount and type of tertiary-qualified people in the workforce, including greater emphasis on trade-trained alternatives in polytechnics.

Additional contributing activities to achieve the goal:

- Reduce university student numbers while increasing polytechnic capacity.
- Increase and financially support PROs to participate in skills development.
- Better integration of alternative pathways to tertiary education.

Priority 4: Integration and Collaboration

We agree that this should be a high priority, however greater connectedness across relevant government agencies would be beneficial. Most valuable would be stronger engagement between the science and innovation parts of the Ministry of Business, Innovation and Employment and research funding within the Tertiary Education Commission. This would help facilitate greater integration and coordination of research.

Additional contributing activities to achieve the goal:

- Strengthen formal partnerships between universities and PROs – currently underway with the Statement of Collaboration, which could be mentioned in the Strategy.
- Develop specific resources to capture joint PRO-university work on retaining early career researchers in the public research system and sharing scarce senior specialist resources.
- Recognise that PROs have roles extending beyond commercial innovation, particularly in capability development and training as well as the delivery of research for government agencies.
- Create mechanisms for sharing expertise and resources across the science and innovation system.
- Develop coordinated approaches to addressing national science priorities that cover all agencies, not just the Ministry of Business, Innovation and Employment, through the Prime Minister’s Science, Innovation and Technology Advisory Council.

Priority 5: International Education

We disagree with the emphasis this priority has in the strategy. International education can divert focus from delivering on New Zealand's education needs. In addition, the pursuit of overseas education revenue to satisfy international market demands may compromise standards and quality in addressing domestic requirements.

Delivery of the Strategy

PROs are not adequately mentioned in the current draft and should be recognised as integral parts of the tertiary education system. As well as their role in research and partnering with tertiary education providers, these organisations are critical for delivering applied degrees, developing skillsets for working in and with industry, as well as specialised professional training. All of these are important for delivering on the aims of the Strategy. In addition, consideration should be given to whether this part of the system is adequately funded to meet New Zealand's future capability development needs.

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	ServiceIQ – Te Pūkenga New Zealand Institute of Skills and Technology
Organisation category (please indicate):	• Other (please specify) Work-based Learning
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @serviceiq.org.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**
   No, this all looks sound.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**
   There is no question that AI is the next industrial revolution and as such we need to move quickly to build learning into our programmes so that learners are equipped with the skills they need in the workplace and to be successful entrepreneurs, lifting the productivity of New Zealand.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	Distance travelled, whether through Credit Achievement or Programme Completion is absolutely necessary to measure success of the investment being made.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	The idea that "students and trainees will be able to move seamlessly between provider-based and work-based learning" is aspirational at best. Given the significant challenges encountered in attempting this within Te Pūkenga, it is difficult to see how such integration could be successfully achieved

	across multiple providers with diverse programmes and delivery models.
Do you have suggestions for additional activities to support this priority?	No.

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	This is the reason that as a country we invest in tertiary education. To make us more productive and innovative and generate wealth.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	I believe we should be more aspirational and position New Zealand as a centre of excellence for certain industries. We could attract more international students (export income) through this too.
Do you have suggestions for additional activities to support this priority?	As above

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	Tertiary education should be accessible to all, regardless of background or circumstance.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	As per my previous comment: The idea that "students and trainees will be able to move seamlessly between provider-based and work-based learning" is aspirational at best. Given the significant challenges encountered in attempting this within Te Pūkenga, it is difficult to see how such integration could be successfully achieved

	across multiple providers with diverse programmes and delivery models.
Do you have suggestions for additional activities to support this priority?	Student loans and allowances play a big part in accessibility but there is no mention of them in the TES

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Agree
Comments	It's interesting to note that this objective is included in the Tertiary Education Strategy, especially considering Te Pūkenga was originally established to help achieve it. With the current shift away from that model, it may be timely to reflect on how this goal will be pursued in the evolving landscape.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Disagree
Comments	It is difficult to identify specific, actionable steps within the contributing activities that would meaningfully support the level of collaboration being aimed for. It may be helpful to consider how these activities could be further developed to better enable the outcomes being sought.
Do you have suggestions for additional activities to support this priority?	Work-based Learning Divisions have incredible connections with industry. Look at what is working well and leverage that for the benefit of the wider tertiary sector.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	As an export earner this should be a huge priority
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	International student put more money into the education system allowing providers to invest and be more innovative and adaptive. In the absence of additional government funding for

	the sector, this is absolutely where we should be looking.
Do you have suggestions for additional activities to support this priority?	The broader social context of New Zealand e.g. crime and the economy play into our attractiveness. Once we get our own house in order the students will flow in (provided we have the correct immigration settings).

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	More relevant research for industry and close ties with overseas Universities.
Wānanga	
Polytechnics	Closer connection with industry and more responsive to changing programme requirements
Private Training Establishments (PTEs)	Need for closer monitoring to ensure that they are financially sustainable as collapses affect our reputation with international students
Industry Skills Bodies (ISBs)	I have concerns as to how they are going to be able to perform all the functions required of them with the limited funding they have.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	Speed to market for new programmes and quals is critical if we want to meet the needs of industry and be globally competitive. Currently we're just too slow and that's a system issue with approvals etc.
Other (please specify)	

Monitoring Outcomes

10. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

I think AI will assist a lot in this area. The ability to take disparate data sets from different system to analyse is a game changer.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?
No

Te Tāhuhu o te Mātauranga
Ministry of Education

We **shape** an **education** system that delivers **equitable** and **excellent outcomes**

He mea **tārai** e mātou te **mātauranga** kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**

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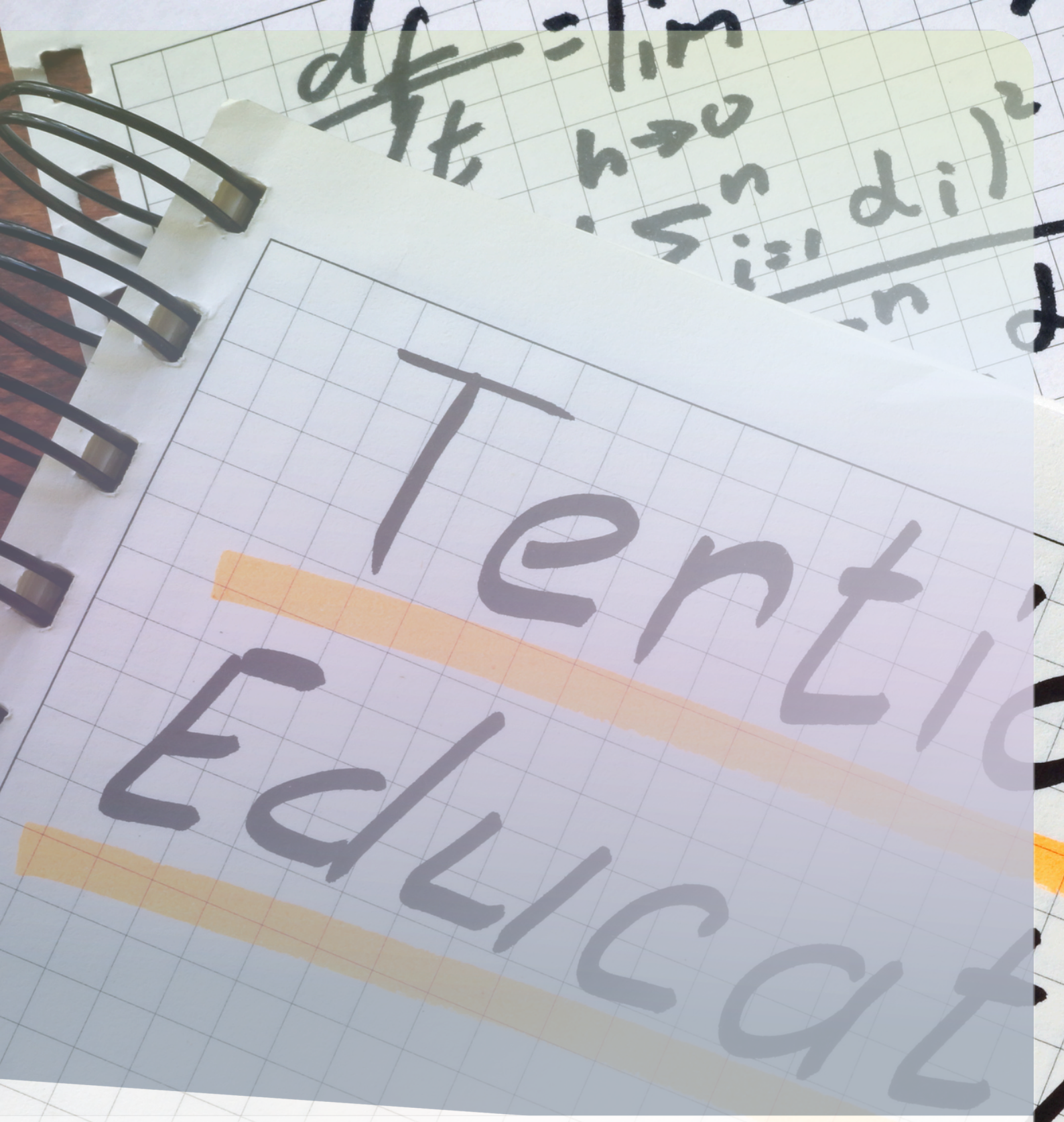
Te Kāwanatanga o Aotearoa
New Zealand Government



Skills Group Response to Draft Tertiary Education Strategy Consultation

SEPTEMBER 2025 | SKILLS GROUP TRAINING LTD (7502)

Executive Summary

Draft Tertiary Education Strategy Consultation

About Skills Group

Skills Group is New Zealand's largest Private Training Establishment, supporting over 20,000 learners annually across vocational education, corporate training, and international programmes. As one of only three former Industry Training Organisations to successfully transition to PTE status, we offer a unique perspective on how vocational education can complement and connect with higher education within New Zealand's broader tertiary system.

Our experience delivering education across multiple levels—from foundation skills to advanced trade qualifications—positions us to understand the critical pathways between vocational and higher education, and the need for balanced policy approaches that recognise both sectors' contributions to economic growth and productivity.

Executive Summary

Skills Group supports the draft Tertiary Education Strategy's focus on economic growth and productivity. We particularly welcome the strategy's direction and endorse the proposal for enhanced performance indicators that measure "distance travelled" and value-added outcomes rather than completion rates alone. However, we do strongly recommend a greater balance between higher education and vocational education priorities.

We also contend that system transformation efforts must include a comprehensive review of government agency roles, policies, and regulatory frameworks alongside provider responsibilities. The scale and urgency of challenges facing New Zealand's economy and tertiary education system require a more visionary approach that charts a path toward the system the country needs, rather than reverting to previous models.

We recommend that the Tertiary Education Strategy should examine government agency roles equally alongside provider expectations, noting that technological disruption and productivity challenges affect all education levels and require comprehensive system transformation across the entire tertiary landscape

Consultation Process Observations

While Skills Group appreciates the opportunity to provide feedback through Independent Tertiary Education New Zealand (ITENZ), we note this consultation represents a departure from established practice. Previous Tertiary Education Strategy consultations have included broader sector engagement through the publication of drafts for more inclusive consultation.

Strategic Direction and Balance

Support for Economic Focus

Skills Group supports the Government's overarching objective for tertiary education and agrees with the economic focus outlined in the proposed strategy. We support the draft's analysis of drivers of economic growth and productivity, believing this should be the overarching objective.

Our experience demonstrates that learners in both vocational education and higher education seek positive labour market outcomes due to their investments in skills and knowledge.

Addressing Strategic Imbalance

However, we observe that higher education and the needs of degree-awarding and research-conducting institutions clearly dominate the new strategy. We believe there is a necessary overall focus on improving how the tertiary sector—at both degree and sub-degree levels—delivers productivity improvements and keeps pace with technology and learner needs.

The strategy could also be broadened to contemplate business imperatives alongside social and community needs. While Skills Group focuses on employment-oriented training, we recognise the value of arts, humanities, and cultural disciplines.

Research demonstrates these areas contribute meaningfully to GDP while delivering substantial non-quantifiable benefits, including cultural preservation, social cohesion, and civic engagement.

Technological Disruption Across All Levels

The draft strategy acknowledges significant disruption and changes in the sector, including the acceleration of technologies, but appears to limit this consideration to degree-level provision. These changes are fundamentally disrupting all workplaces and the nature of work across all industries. They affect how education itself is delivered and assessed across all levels, not solely degree provision.

Key considerations:

- Learners across all age groups require new competencies to utilise digital technologies and artificial intelligence effectively
- The education sector is adopting innovative delivery and assessment methodologies to ensure skills remain relevant for future workforce demands
- Learners increasingly expect educational experiences that reflect technological advances and contemporary learning approaches
- New Zealand's ageing workforce requires fresh thinking about products, credentials, and qualifications offerings, with renewed focus on pathways and outcomes rather than just qualification outputs.

Performance Measurement and Enhanced Indicators

Strong Support for Enhanced EPIs

Skills Group views the proposal to develop new or augmented Education Performance Indicators (EPIs) positively, as they better measure "distance travelled" or "value-added" outcomes. Across our provision breadth, we encounter a wide diversity of learner backgrounds and needs. We support the development of "lead" rather than "lag" indicators and more sophisticated ways to track learner progress and broader outcomes, which would provide much better information than simply counting completions.

Current Limitations

We understand and support the need for clear EPIs to hold providers to account. However, course and qualification completion metrics are highly limited in providing information about the effectiveness of education over time. They are insufficiently sophisticated to account for provider performance at different system levels while considering prior learner success or other barriers to achievement.

Learning from International Practice

For the attention of incoming Industry Skills Boards (ISBs) and the Tertiary Education Commission (TEC), we commend the work by Jobs and Skills Australia using matched data to support the skills and training sector. Their approach helps understand which pathways perform effectively, which educational interventions make the most significant differences, and produces regional workforce "heatmaps." New Zealand's providers would equally benefit from consistent and consolidated national data and insights of this nature.

Eliminating Counterproductive Compliance

We believe it is time to end operational compliances and processes that don't align with improved outcomes, don't add value, and actively undermine positive system behaviours. Two specific examples include:

1. Recording non-completions when provider-based learners secure employment in industries related to their training before completing
2. Recording withdrawals each time an apprentice changes employers but continues their apprenticeship

These practices penalise providers for successful learner outcomes and create perverse incentives that work against the strategy's economic objectives.

System Transformation Requirements

Comprehensive Agency Review Needed

The draft strategy provides a clear description of the problems facing the tertiary education system and outlines the system we should have. However, in terms of "changes we need to see in the next five years" and proposed priorities, the strategy essentially treats agencies as disinterested observers. The vast majority of "contributing actions" are tasks that the government will require providers to undertake and be accountable for.

Beyond Provider-Centric Solutions

We believe the next Tertiary Education Strategy should pay equal attention to the roles and operations of policy, regulator, and funder agencies if we are to truly transform the tertiary education system and ensure it meets learner needs while driving economic growth.

The vocational education and training sector has experienced two large-scale reform processes that restructured "who does what" in the sector. However, the underlying products it delivers and the operational environment for its work have not been in scope of either reform.

Time for Product and Process Reform

For this strategy, we recommend a thorough examination of the "product" that the tertiary system needs to deliver, as well as addressing the accumulation of compliances and constraints that slow down the system. These barriers make it difficult for providers to deliver the "just-in-time" and fit-for-purpose education and training models that today's learners and employers demand.

Specific Transformation Goals

We submit that a goal for the next five years should be to review comprehensively:

- Operational policies and funding mechanisms
- Rules and regulations governing providers and provision
- Qualifications and quality assurance policies, some designed for previous system iterations
- An explicit objective of the Tertiary Education Strategy could be to implement a comprehensive new set of enabling policies and processes that drive high-quality, flexible, and innovative provision, responsive and agile to changing needs.

Work-Based Learning and Industry Skills Boards

Measured Optimism About ISBs

The draft asserts that Industry Skills Boards will support better matching of work-based learning to labour market needs, presumably through their "narrowed focus" on workforce planning. While we support this direction, we note that Workforce Development Councils (WDCs) were equally mandated and more generously resourced to perform this function across all vocational education delivered system-wide, not just work-based learning. The results of these efforts have been fragmented and uneven.

Learning from Previous Experience

The transition from WDCs to ISBs with a more limited scope raises questions about effectiveness. WDCs had broader vocational education coverage and greater resources but still struggled to achieve consistent labour market matching. ISBs' "narrowed focus" may limit their ability to address comprehensive workforce development needs.

Ensuring Effective Implementation

For ISBs to succeed where WDCs faced challenges, we recommend:

- Clear performance measures for effectiveness in addressing skills mismatches
- Comprehensive labour market analysis that extends beyond work-based learning
- Strong connections between ISB planning and broader vocational education provision
- Adequate resourcing to match their workforce planning responsibilities

Addressing Systemic Challenges

Scale and Urgency Recognition

We believe the challenges facing New Zealand's economy and tertiary education system are of such scale and urgency that the strategy needs to chart a more visionary path toward the system the country needs. The current approach risks offering fundamentally the same products delivered in the same ways as previous iterations.

Multi-Factor Productivity Challenge

Tertiary education is a key driver for lifting New Zealand's overall workforce productivity, but long-term multi-factor productivity remains stubbornly flat to declining. Similarly, New Zealand's high levels of skills mismatch between people undertaking tertiary education and their subsequent careers and employment pathways are well-researched and must be addressed.

Beyond Traditional Measures

The strategy must move beyond traditional qualification-based metrics to address:

- The changing nature of work and workplace requirements
- The need for continuous learning and adaptation throughout careers
- The integration of technology into all aspects of work and education
- The requirements of an ageing workforce seeking career transitions and skill updates

Recommendations for Implementation

Immediate Actions

1. Balanced Priority Implementation: Ensure vocational education receives equal strategic attention across all five strategy priorities
2. Enhanced Performance Indicators: Implement "distance travelled" and value-added measures that recognise diverse learner starting points and outcomes
3. Compliance Review: Eliminate counterproductive administrative requirements that penalise successful learner outcomes

Medium-Term Transformations

1. Regulatory Framework Overhaul: Comprehensive review of operational policies, funding mechanisms, and quality assurance processes
2. Agency Role Redefinition: Clear articulation of how government agencies will adapt their operations to support economic growth objectives
3. Data and Analytics Enhancement: Implement matched-data approaches for workforce planning and provider performance assessment

Long-Term System Changes

1. Comprehensive System Design: Move beyond incremental changes to fundamental system redesign that addresses contemporary workforce and economic needs
2. Technology Integration: Ensure all education levels effectively incorporate technological advances in delivery and assessment
3. Outcome-Focused Accountability: Shift from qualification-completion metrics to employment and productivity outcome measures

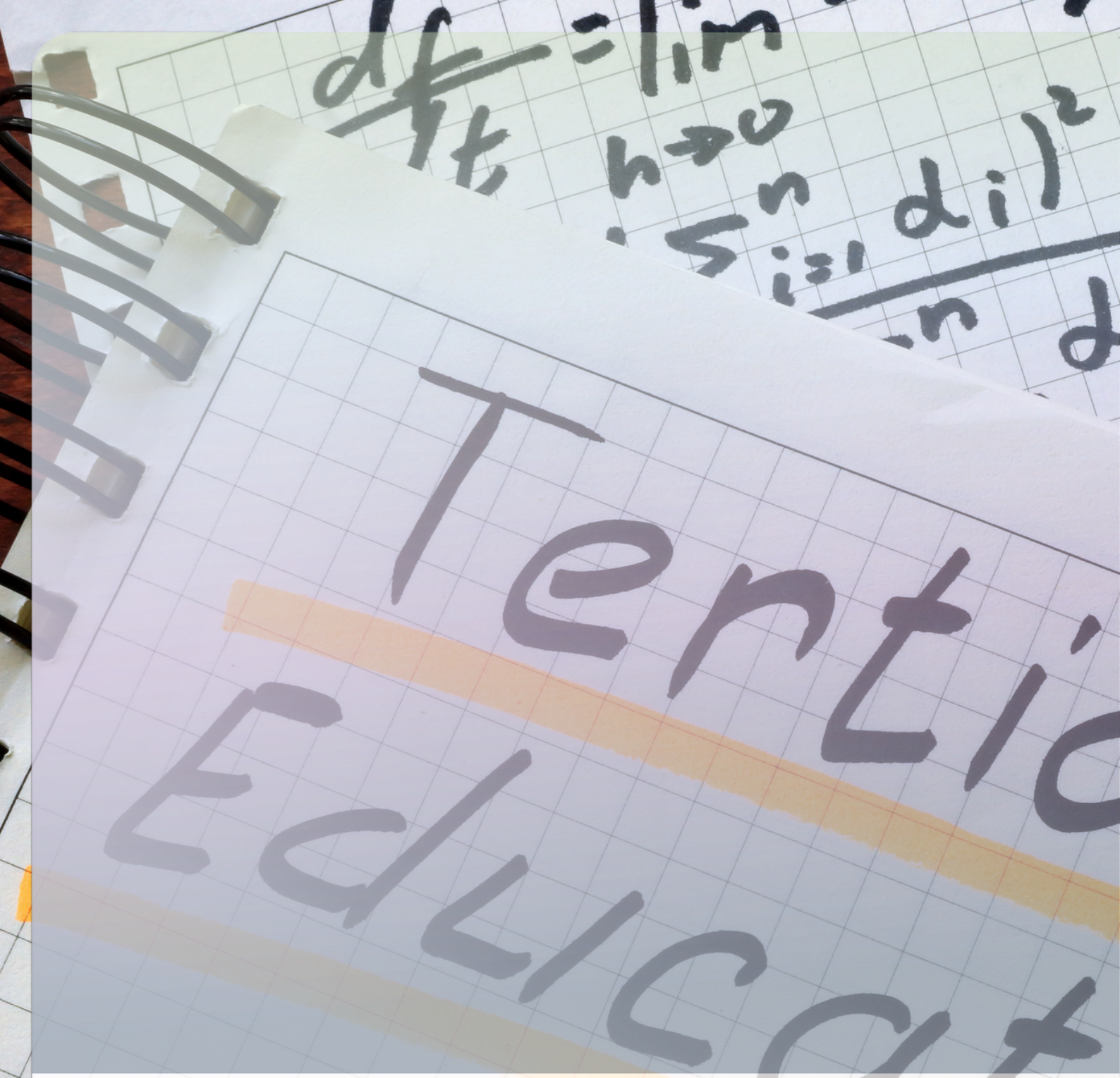
Conclusion

Skills Group commends the Government's commitment to economic growth through tertiary education reform. The draft strategy provides important foundations that, with the recommended enhancements, can drive meaningful system transformation.

The scale of New Zealand's productivity challenge requires more than incremental change. We need a comprehensive transformation that examines not only what providers do but also how government agencies, funding mechanisms, and regulatory frameworks can better support responsive, innovative education delivery.

As New Zealand's largest PTE, Skills Group is committed to working collaboratively with government and sector partners to achieve the visionary tertiary education system our economy requires.

We welcome the opportunity to engage further on these recommendations and look forward to contributing to the successful implementation of the strategy. The time for transformational change is now - New Zealand's economic future depends on getting this right.



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WWW.SKILLS-GROUP.ORG

Spada's Submission *on the* **DRAFT Tertiary Education Strategy**

26 September 2025

Via Email: tertiary.strategy@education.govt.nz

Background

Established in 1982, Screen Producers New Zealand (Spada) is a non-profit, membership-based organization representing key producers and production companies in the New Zealand screen industry. Spada's membership includes producers, production companies, post-production houses, broadcasters. The majority of its members are small to medium-sized enterprises, reflecting the makeup of the industry in New Zealand.

Spada plays a crucial role in advising the government and key stakeholders on policies affecting the screen industry. It ensures that the government is well-informed about industry matters and provides guidance when needed. This includes offering input on proposed or existing New Zealand screen production incentives, coproduction treaties, trans-Pacific negotiations, government agency arrangements, policy and regulatory frameworks (such as media regulation), and public service broadcasting.

Spada has engaged throughout the Reform of Vocational Education process. In addition to working alongside other screen industry bodies to engage with TEC and Toi Mai via hui and online communications, Spada has also made the following submissions on the:

- Proposal to Replace NCEA - **September 2025**
- Proposed Coverage for Industry Skills Boards - **August 2025**
- Consultation on ISB Coverage and Creation (TEC) – **May 2025**
- Draft Workforce Development Plan for the Toi Pāho Above-the-Line Workforce, Te Waha o Tāne – **June 2024**
- Vocational Education Reform Proposals – **September 2024**
- Te Wao Nui a Toi Workforce Development Plan 'Below the Line' - **April 2023**

Spada's Submission

The Draft Tertiary Education Strategy (TES) for targeted sector consultation proposes one key objective and five current and mid-term priorities established by the Government.

Spada's submission responds to the objective and priorities below.

In addition, Spada notes that:

- Principles of Te Tiriti of Waitangi have not been embedded in the TES, as required by the Government as a Treaty partner.
- There is little mention of the learners themselves throughout the TES. This means there is a focus on industry and providers - rather than the individuals seeking the education.
- Accurate data remains a challenge for the screen sector and other creative industries. The TES notes data under several key priorities; however, it does not establish how to resolve a lack of accurate data where this occurs.

OBJECTIVE: ***A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.***

Spada SUPPORTS closer connections between tertiary education planning and providers, industry, and learners, to create the timely delivery of relevant skills and knowledge across the tertiary education system.

In a rapidly changing employment landscape where the future of work is unknown in many sectors, a foundation and valuing of creative skills and knowledge will support learners to understand, adapt, and thrive as new roles and innovative career paths appear.

Therefore, Spada SUPPORTS the shift from STEM (Science, Technology, Engineering, Mathematics) to **STEAM** (Science, Technology, Engineering, Arts, Mathematics) across education at all levels.

STEAM not only recognizes that creativity and artistic thinking are critical for innovation and problem-solving in STEM fields, but it also places an importance on creativity, and encourages a more inclusive learning environment and broader student engagement.

Priority 1: Achievement - *Ensure students and trainees achieve qualifications that lead to good careers and economic security, with a focus on strong pathways between school, tertiary education, and work.*

Spada AGREES that completion of any tertiary education provides a better outcome, so it's a good priority overall. However:

- Does a historical lack of achievement speak to poorly designed qualifications and a lack of connection to the industry it seeks to train for?
- Accountability of providers is required to ensure student numbers are realistic for industry demand, and to continually engage with industry to meet standards and changes.
- In screen and other creative sectors, multi-year degrees are often driven more by education providers than industry needs. While creative and theoretical training for up to three years can provide a good foundation and soft skills which transfer across various industries, degree graduates are seldom suited to the hands-on nature of work required for entry level jobs in the screen industry. Under an achievement priority, longer duration qualifications for vocational education could incorporate exit points along the way e.g. Diploma / Advanced Diploma / Degree to ensure learners can graduate with a qualification that meets industry need at multiple points along the journey, and tie in the with *'distance travelled'* model.
- There are many benefits to micro-credentials and stackable qualifications for the creative sector and learners alike – e.g. less debt for learners, the ability to meet demand in a sector with fluctuating employment, core skills and knowledge can be developed in specific areas of work to reflect the nature of a career in the industry
- *Develop and apply "distance travelled" model* - This action point aligns with the current NCEA model, which is being abandoned. How will this align with the proposed NZCoE model, or will it create disharmony with the secondary education framework?
- What counts as 'employment' in the data providers will be obligated to report on? In screen, it can take some time before paid roles are achieved, even more so in the current environment, and those roles could be anything from a few days to a few months in duration and will likely be a contract rather than 'employment'.
- Many tertiary students commence training without understanding what a job or career might look like in their chosen industry. This is particularly true for the screen industry and a 'gig' economy. Resources to explain roles and career options would benefit students enrolling in tertiary training and should be prioritised in the TES.

Priority 2: Economic Impact and Innovation - ***Increase the economic impact of tertiary education by delivering relevant, adaptable skills, and research that drives productivity, innovation, commercialisation and broader economic opportunities***

Spada AGREES with the action point to *Focus vocational education and training investment on where it can genuinely address skills supply issues, including through analysis, planning, and advice functions of Industry Skills Boards*.

However:

- Each vocational training ISB will only have a few representatives from different sectors. Because the ISB model gives industry a weaker voice than the WDCs did, a strong framework is needed to ensure industries without a former ITO are properly engaged

- This priority mentions research for universities a number of times. How does this relate to the research opportunities in VET?

Priority 3: Access and Participation - ***Enable access to education and training for people from all backgrounds and regions, ensuring more people build relevant skills that contribute to a productive economy***

Spada AGREES that access to education and training for people from all backgrounds is important. For the screen and creative sectors, Access and Participation considerations include:

- Regional training that meets demand in that area. For screen sector this includes prioritising training and education in the regions where industry activity occurs

- Improved access to a range of shorter, cumulative training options for learners, with work-based learning and quality online provision giving students more options for accessing tertiary education.

This includes greater availability of shorter, cumulative options for students, with more accessible work-based learning and quality online provision giving students more options for accessing tertiary education

Spada supports this idea in principle, with the right connection to industry and support for learners in place e.g. if learners complete an online introduction to the screen sector course, how will that help them achieve employment in a word-of-mouth gig economy?

- Access to technology remains a barrier to education for many (devices and connections), how would this be resolved for the delivery of online programmes?

Strengthen secondary-tertiary pathways, particularly for vocational education and training, and for young people at risk of being not in education or employment –

Spada supports stronger pathways from secondary to tertiary. How will the proposed overhaul of NCEA and ensuing disruptions support this to happen?

Access to data remains a challenge for the creative sectors where accurate job and employment information is hard to establish. What commitment is there to improving access to data within this strategy?

Priority 4: ***Integration and Collaboration Deepen collaboration between education providers, employers, iwi, research institutions, and communities to align education with regional and national economic development*.**

Spada AGREES that collaboration is essential to the development and delivery of tertiary education that is relevant, of a high standard, adaptable, and can allow for specific needs to be met on a regional basis and in a timely fashion.

For the screen sector, a lack of collaboration across the education ecosystem has historically been the single biggest barrier to success for graduates and for industry as it fostered a lack of trust that graduate's skills and knowledge meet industry standard and current best practice, creating hesitancy for industry to give graduates a role in a word-of-mouth employment market.

The action points under Integration and Collaboration make little mention of vocational education, and the unique makeup of screen and other creative sectors comprised of freelance / sole trader / contractor instead of employees. What does collaboration and integration look like in a gig economy? Who are the employers? This should be established clearly in the TES.

Priority 5: International Education - ***Boost numbers of international students, supporting the sector to grow and increasing New Zealand's international connectivity, as set out in the International Education Going for Growth Plan***

Spada neither agrees nor disagrees with Priority 5. However, it understands the benefits that are derived from boosting international student numbers such as increased income, enhanced experience for New Zealand students, providers and industry through connection with international students and understanding different and new ways of training working.

For noting with regard to priority 5:

- There is no mention of the additional support required by many international students - both from a pastoral care and learning support perspective, and how this would be resourced

- New Zealand's tertiary education framework has had constant upheaval for several years and appears to be some time away from a smooth experience across the board. How will boosting numbers through international students affect the domestic student's learning and experience? It is imperative that New Zealand doesn't covet the income from international students at the expense of domestic students.

In Conclusion

Thank you once again for the opportunity to comment on the TES.

Spada supports the Government's overarching objective for tertiary education - *A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life* - however, as outlined above, we believe there are key areas where the strategy could be strengthened to better meet the needs of learners in the screen industry.

Please don't hesitate to contact us if you have any questions about our submission.

Nga mihi,

9(2)(a)

W: spada.co.nz

Te Pūnaha Matatini
Complexity is at our heart

30 September 2025

Re: Submission to the sector consultation draft of a new Tertiary Education Strategy

Tēnā koutou

Te Pūnaha Matatini (TPM) is Aotearoa New Zealand's Centre of Research Excellence in Complex Systems. Our purpose is to undertake complex systems research that reveals the patterns and dynamics shaping our world, and to cultivate the ethical and collaborative complex systems experts needed to address Aotearoa New Zealand's most pressing challenges. Our vision is a future Aotearoa where knowledge is created through ethical collaboration across disciplines, cultures, institutions, and communities; and where complex systems approaches are trusted and applied across society to transform our interconnected world for future flourishing.

We welcome the opportunity to contribute to the consultation on the draft Tertiary Education Strategy. Given the short timeframe of the consultation and our focused mandate as a Centre of Research Excellence (CoRE), we respond to selected questions only.

Q: Do you have any comments on the draft objective for tertiary education?

We note that the draft objective reads narrowly focused on people as workforce and an undefined notion of (seemingly individual) success. Our recommendation is to take a much more future focused approach, and acknowledge that demand, opportunities and characteristics of work are currently shifting in the most significant way since the industrial revolution. We formulate the following alternative draft objective to stimulate thought in

that direction: A tertiary education system that enables people to contribute to New Zealand as a role model economy that balances innovation and high-productivity with planetary boundaries and human flourishing under rapid technological change.

Q: Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

We generally agree to the drivers of change identified in the draft strategy. However, the way these are contextualised in the section titled "Why change is needed" indicates that a solution is sought for a problem for which cause and effect are insufficiently understood.

The draft strategy reads as if it is assumed that the higher education institutions alone are responsible that Aotearoa lags "leading international comparators in research commercialisation, industry collaboration, and overall research and development intensity", and that teaching and research simply needs to change to overcome this. No consideration is given to the geographic, economic and societal conditions that promote or prevent an entrepreneurial knowledge economy that tertiary education feeds into and equips for. It is the systemic interplay of the five challenges listed in the draft strategy that has led to a diminishing social license for higher education that can be increasingly felt in recent years.

Q: Do you think the TES should have additional or different priorities?

Following on from our responses to the previous two questions, we think the draft strategy is missing "Social License" as a priority. A successful tertiary education system should be built on the back of broad societal support for higher education and aspirations by people for intellectual pursuit. This requires a non-partisan commitment to and careful communication about the value of higher education, and concerted effort from all entities that form the tertiary education sector as well as entities entrusted with its governance

including parliament. Unless Government, Universities and the wider public service agree on whether higher education matters or not – and communicate this with vision and empathy to the public – NZ won't build the capability and capacity necessary to thrive.

Ngā manaakitanga,

9(2)(a)

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Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	Te Wānanga o Aotearoa
Organisation category (please indicate):	Wānanga
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) *@twoa.ac.nz*

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

   The draft objective captures the economic rationale but underplays the broader contribution of tertiary education to society and nationhood. For Te Wānanga o Aotearoa, tertiary education is about whānau transformation through education, not just qualifications or productivity.

   We recommend explicitly referencing:

   - Te Tiriti o Waitangi obligations.
   - The role of tertiary education in advancing equity, cultural identity, and resilience.
   - The economic imperative of investing in the youthful Māori population, New Zealand's future productivity and fiscal sustainability depend on their participation and success.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

   We acknowledge the demographic, technological, and labour market drivers, but TES must remain stable across political cycles.

   Key drivers for us include:

   - Success of Māori and Māori youth as an economic imperative, not just an equity goal. Without strong foundation pathways, New Zealand's future workforce and fiscal health are at risk.
   - Rising demand for digital and AI-enabled learning, requiring investment in flexible delivery.
   - Lifelong learning as a core pathway, not just a school-to-study-to-work pipeline.
   - The need for stronger system leadership and iwi inclusion, reflecting lessons from the Māori economy.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

   Yes. The TES should:

   - Add Te Tiriti o Waitangi as a distinct priority, ensuring visibility of Crown obligations across all providers.
   - Explicitly recognise the legislated role of wānanga (Education and Training Act 2020, s222 and s424(2)(e)): to protect and advance mātauranga Māori and āhuatanga Māori, and to support iwi, hapū, and community development.

   For Te Wānanga o Aotearoa, these statutory purposes are expressed through our kaupapa of whānau transformation, which extends beyond Government-set TES priorities.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	Strongly agree
Comments	Achievement must be defined more broadly than qualification completions. For many of our tauira, success includes: • Building confidence and identity. • Learning te reo and tikanga. • Entry to higher-level study or employment aligned with iwi and regional economies. TES should explicitly support Level 4–7 vocational provision and foundation education. These enable second-chance learners and are essential for economic growth.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	**Neutral**
Comments	Current proposals risk being too narrow, focused on completions without recognising holistic success or incremental achievements.
Do you have suggestions for additional activities to support this priority?	• Fund wraparound and kaupapa Māori learner support (e.g., Te Ata Hāpara). • Recognise bridging programmes and micro-credentials as valid TES achievements. • Embed measures of whānau and community outcomes, not only graduate employment.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	Neutral
Comments	We acknowledge the government's expectation of economic returns. However, "innovation" should include: • Mātauranga-based solutions for climate, sustainability, and cultural revitalisation. • Exportable wellbeing models such as Tau Ora, contributing to productivity and DEI/ESG agendas. • Indigenous-led international programmes that support the $6B export education target and global partnerships.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Neutral
Comments	
Do you have suggestions for additional activities to support this priority?	• Incentivise iwi–industry partnerships. • Fund kaupapa Māori research (Te Manawahoukura) as part of national innovation. • Support digital and AI-enabled delivery, aligned with Indigenous values.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	Agree, but constrained by current funding settings.
Comments	The Investment Plan model rations access, opening and closing with economic cycles. This approach undermines stability for providers and certainty for tauira. True system-wide participation cannot be achieved until secondary school achievement gaps by ethnicity are closed, particularly for Māori and Pacific learners. Te Wānanga o Aotearoa plays a unique role in providing entry pathways for our learners, many of whom have no NCEA or previous tertiary success. Successive governments have reduced funding and access to foundation and lower-level provision, which has the perverse effect of weakening progression into higher-level study. Without strong foundation pathways, participation at degree and postgraduate levels will always lag for Māori and underserved populations.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Neutral
Comments	Shift from capped EFTS to a national network view of provision, ensuring every community has access to a range of vocational, cultural, and foundation learning opportunities.
Do you have suggestions for additional activities to support this priority?	Invest in open lifelong learning pathways that provide a gateway to higher education and ongoing upskilling. Reinstate or expand support for foundation education as an economic imperative, without it, participation and achievement targets at higher levels will remain unattainable. Fund digital infrastructure and regional delivery that ensures access regardless of geography.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	Agree in principle.
Comments	Collaboration is essential but current funding settings force competition. Wānanga already step in as anchor providers when others withdraw, often without support.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	Neutral
Comments	
Do you have suggestions for additional activities to support this priority?	Shared services (SMS, IT, AI-enabled BI tools) to reduce costs. Fund cross-provider initiatives to improve tauira mobility and experience. Resource iwi-led partnerships, recognising their role in regional system leadership.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	Agree
Comments	International income supports system sustainability but must protect quality and cultural integrity. Te Wānanga o Aotearoa offers a globally unique Indigenous-led portfolio, positioning NZ as the leader in kaupapa Māori education and cultural diplomacy.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	Internationalisation contributes to: • Sustainability (through revenue). • Innovation (export of Indigenous knowledge and wellbeing). • Access (cross-subsidisation of provision for underserved learners).
Do you have suggestions for additional activities to support this priority?	Incentivise reciprocal exchanges with iwi partners. Support internationalisation that is values-based and directly benefits whānau.

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

TES priorities should be monitored through existing Investment Plan processes, not new systems.

We recommend indicators that:

- Disaggregate by ethnicity, region, and socio-economic status.
- Capture whānau transformation and iwi development outcomes, not just qualifications.
- Balance TREF (excellence) with DQ7 (capacity) so Māori research is both rewarded and sustained.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

The TES is a generational opportunity. To succeed, it must:

- Embed Te Tiriti as a priority.
- Recognise wānanga as distinct institutions with legislated purposes under the Education and Training Act.
- Treat foundation education as an economic enabler, not just equity.
- Balance excellence and equity through TREF + DQ7.
- Leverage internationalisation and Indigenous innovation as export strengths.

TES must not only grow an innovative economy, but also transform whānau, strengthen iwi, and protect mātauranga Māori outcomes that Te Wānanga o Aotearoa is uniquely positioned to deliver.

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Ministry of Education

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Te Kāwanatanga o Aotearoa
New Zealand Government

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Submitter details

Full name	9(2)(a)
Organisation name	Te Whai Ao — Dodd Walls Centre for Photonic and Quantum Technologies
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify) Centre of Research Excellence
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @auckland.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The desire to focus on advancing an innovative, high-productivity economy, and improve quality of life is a laudable objective. However it has certain important consequences that may be unintended.

1.1 One of these consequences is the need for training to a high (internationally recognized standard) - this goes beyond professional courses and is essential in science and engineering. There is a tension between measuring success in terms of how far someone has improved and an international expectation of excellence. The latter is essential if New Zealand is to be globally competitive in key technology and science and engineering areas.

1.2 Another issue is the cost of education for individuals and families, especially among those target demographics the tertiary sector seeks to attract. The high cost of study is an impediment to many. For the majority it results in years of debt before employment even begins. Many students also need to work while studying to afford tertiary education, the demands of which can impede their focus. Students from lower socio-economic groups are more likely to experience these pressures, or to have to give up study to support their families if needed.

1.3 A longer-term issue is the demographics of the world's population. The only continent projected to have an increased number of younger people is Africa. Therefore, there are certain challenges to striving for increased overseas students in a world in which the number of younger people is not growing at the rate it was.

1.4 One possibility is that year 1 in tertiary education is used to bring all students up to the same level of expertise so that they can make the most out of subsequent years of study. A possibility is that year 1 teaching might adopt a less structured assessment approach focusing on passing courses rather than strict grading.

"Un-grading" at first year protects students with low grade point averages. It also helps with completion rates and better outcomes. This has been successfully applied in a number of institutions including Duke University, USA. In Australia, the University of Sydney has adopted the model by using "Satisfied Requirements" (SR) or "Failed Requirements" (FR) in some units instead of numerical marks, which are not included in students' Weighted Average Mark (WAM). Whatever method is adopted, it is important that performance is raised, not that the bar to success is lowered.

1.5 The Tuākana academic and mentoring support programme for Māori and Pacific students at the University of Auckland has proven a useful adjunct to study for those cohorts. The programme assists with topic-specific tutorials, one-on-one sessions, and exam preparation, as well as support for scholarships, research opportunities, tutoring, jobs and career mentoring.

1.6 The goal of achievement proposes that tertiary education providers not only identify barriers to retention but also address them. It should be noted that the ability to address the cost barrier preventing attendance or focus on study is out of providers' control.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Centres of Research Excellence (CoREs) are a good way to facilitate links with Public Research Organisations (PROs) and industry that transcend specific tertiary providers. CoREs provide a useful delivery model for these interactions because they enable nationwide, whole-of-industry engagement. They take an NZ Inc approach and are not restricted by particular views of specific institutions. An example is the

Quantum Meets series where Te Whai Ao — Dodd-Walls Centre invited Australia's former Chief Scientist to engage with stakeholders across a range of industries.

Additionally, COREs are focused on provided well-trained graduates and have specific programs for teaching commercialisation and entrepreneurship. Both MacDiarmid Institute and the Dodd-Walls Centre provide good examples of these. COREs also provide an incubator and nurturing environment for ideas becoming products and spin out companies and for training postgraduate students.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

Many New Zealand students leave after completing their Masters for experience and jobs abroad. This can be because they don't see a pathway to employment in New Zealand or they prefer to complete their studies at PhD level a prodigious overseas institution.

Explore a loan forgiveness policy which supports the economy and students, providing an incentive for students to stay in the country for a period after graduation. In Canada, the federal government offers loan forgiveness to eligible medical professionals (nurses and general practitioners) who remain to work in under-served rural or remote communities.

The Singapore government uses a combination of financial incentives, contractual obligations, and monitoring mechanisms to ensure that foreign students who receive tuition grants work in the country for three years after graduation, effectively repaying 50% of their tuition grant through their labour in the local economy.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	This is critical to the desired success of growth in the economy. But this success needs standards to be high (leads back to tension with distance travelled versus standards see above). So, it is important to consider ways to achieve this. Suggestions for fees paid for those who work in NZ after graduation in jobs that the country clearly needs. Good feedback loops in which employers decide which programs in TE are the most valued.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree

Comments	The improvement for weaker students is perfectly laudable, but it should not come at the expense of standards – see suggestion for ungraded first year operation. Such support is also not without cost. Some consideration should be given to the best pathway for individual students so that they are not set up to fail.
Do you have suggestions for additional activities to support this priority?	Ungrading and additional peer mentoring and support.

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Agree
Comments	This is a good direction. The issue is implementation and assessment of success. Industry engagement by tertiary providers is key to responding to labour market signals, but also to developing and growing ecosystems in new disciplines, especially advanced technologies. We can't expect to retain these students if there are no employment opportunities for them.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	Agree with the expected changes - one additional driver might be the effectiveness of Universities (and others) to drive innovation through the creation of new IP and new spin out companies. It is noted that the CoREs have had some success in relation to such activities. A focus on technical skills should not be undervalued as it is often these exceptional skills that lead to innovation. Without new ideas, learning about entrepreneurship lacks traction.
Do you have suggestions for additional activities to support this priority?	If there is a desire to add more soft skills in the training of students while maintaining a high level of technical skill (which is at the

	cornerstone of innovation) then it may be worth considering extending the duration of degrees by an additional year. This would have some impact with regards allowances and other support. Scientific and technical business endeavours require a particular mix of skills, not always taught in a single discipline at Universities or tertiary institutions. These spin-outs need marketers, communicators, and salespeople. Similarly, governments increasingly require policy makers and legal experts who can assist in developing regulation for new technologies using artificial intelligence and quantum mechanics. Another method of building these pan-disciplinary skills is to offer students in the arts, law and business with a basic year of scientific and technical knowledge sufficient to provide a background understanding of the topic.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	One of the main constraints is financial and socio-economic. It is also important that clear pathways be set out for students. Everyone should have the ability to go to university or other tertiary education provider BUT this may not be the right option for them. A strong focus on advice in high school may be helpful.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Agree
Comments	Fees and cost of living are both serious impediments to opportunities for all. The fee forgiveness policy referred to earlier partially alleviates this.
Do you have suggestions for additional activities to support this priority?	

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree
Comments	Excellent direction – noting that CoREs already provide a model for this with high levels of activity with industry – creation of start-up companies and strategic direction in specific areas of research strength.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree
Comments	See comment about CoREs
Do you have suggestions for additional activities to support this priority?	Please see the answer to Question 2.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Agree
Comments	There are some real constraints here. Competition for overseas students is very high (particularly from Asia). Demographics are not that positive (populations are falling) except for Africa.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	There is a real danger that Universities/TEP use up significant resources competing with each other for these students. A national strategy might be a good idea. If regional growth is important, some level of government incentive to encourage students to work in the regions may be required. This assumes job opportunities exist there, making the relationship with industry in building ecosystems vital.
Do you have suggestions for additional activities to support this priority?	

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	Vision matauranga (Māori focus) is an important way for Universities to achieve this vision and should be mentioned as it is for the other TEP.
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	
Other (please specify)	CoREs and national research centres are absent from the document yet can play a valuable role in meeting these strategic goals. Advantageously these are often trans institutional and have a New Zealand focus.

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

Workforce retention could provide an additional indicator, as well as industry engagement and job creation in particular disciplines, by region.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

New Zealand has a range of tertiary education providers, each with a part to play in the wider system and each with its own cohort of students with differing needs and abilities. Accordingly, it would be wrong to suggest they all share the same **scope** of activities and that they address the strategic priorities the **same way**. Critically, lowering the bar on internationally recognised qualifications is not the way to increase achievement.

Student retention in NZ cannot be realised without a healthy ecosystem and economy, nor can commercialisation. The strategy should not be OSFA (one size fits all) because we differ as providers. Arguably, this strategy is too broad brush with some directives having unintended consequences, such as reducing the value and reputation of a key NZ export.

The failure to include mention of CoREs is a serious gap given the emphasis on economic outcomes and our powerful role in collaborating nationwide to grow new companies. In closing, matters such as retention, attracting students from under-served communities and boosting regional economies are levers available to the government at a policy level, not individual institutions.

When setting strategy, regard should be given to the economic realities facing students today from a whole-of-life perspective. Walk in their shoes for a moment. Students considering tertiary education in 2026 know they're likely to start their working lives in considerable debt, be unable to find a job in their regional town and are unlikely to ever own their own home.

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Te Kāwanatanga o Aotearoa
New Zealand Government

Tertiary Education Commission
Te Amorangi Mātauranga Matua

Submission on the draft Tertiary Education Strategy 2025

TEC's Submission on the draft TES 2025

The Tertiary Education Commission (TEC) is grateful for the opportunity to comment on the draft Tertiary Education Strategy. This submission provides feedback from the TEC's Board of Commissioners on the Minister for Universities and Minister for Vocational Education's draft Tertiary Education Strategy (TES). Its purpose is to provide operational advice that that will help you produce a TES that we can implement effectively.

Key messages:

We support the direction of the draft TES, especially its focus on collaboration, educational success, and employability.

The clear direction of the new TES will enable clear guidance for the sector.

Implementing the TES will require appropriate additional levers and may require additional resourcing for TEC.

We will need to manage the sector's current capacity constraints to support timely implementation.

Support for employers is essential for growing work-integrated and work-based learning and industry collaboration.

A broad base of fundamental research is an essential foundation for commercialisation and targeted research.

Developing effective new measures will take time and add a level of compliance

We're pleased to see a continued focus on Māori aspirations, Te Tiriti, and the role of Wānanga.

We support the overall direction of the TES

We welcome the focus on strengthening TEOs' connections with schools, industry, research system, and each other. The Strategy rightly emphasises the need for TEOs to work closely with employers and communities to support New Zealand's economic growth.

We are also pleased to see a strong focus on achievement and equitable education outcomes. This complements our work to shape a system that works for all learners. We

want more people completing qualifications that employers value, generate economic growth, and improve their lives. A significant and growing proportion of TEC funding is currently supporting priority provision. This also requires supporting people to understand and choose pathways with good employment opportunities. TEC has a legislated function to provide publicly available career information services, and we expect TEOs to provide additional support to their students and trainees.

It is important to ensure priority populations' needs are appropriately highlighted – particularly disabled and Pacific people.

The TES's clear direction will provide clarity for the sector

The TES is a key document for the TEC, setting the overarching direction for our $4 Billion investment in tertiary system each year. The Education and Training Act 2020 requires that we give effect to the TES through our Investment Plan functions and have regard to the TES in all our legislated functions.

We welcome that the draft TES is more directional than the current (2020) TES. The current TES provides a single set of objectives that apply across the entire education system, from early childhood to tertiary. But this consistency comes at the cost of depth and relevance to the tertiary system. In contrast, the new draft has an unambiguous focus on the tertiary education system. This clarity of direction will make it easier for us and TEOs to determine what we need to do to give effect to it.

Implementing the TES will require a broad range of levers

The TEC gives effect to the TES primarily through the Investment Plan process. Our ability to implement the TES also relies on supporting levers including the design of funds and funding mechanisms, TEC's operational strategy and measures, our relationships with providers, and our broader leadership role in the system.

We look forward to on-going discussions with Ministers and other agencies about how we can implement the TES most effectively throughout the term of the TES. New levers and additional resourcing may be necessary to support effective implementation.

The sector's current capacity constraints may slow implementation

TEOs are currently operating within very tight fiscal parameters. Additionally, much of the sector is busy grappling with structural changes to the VET system. The sector will need time to implement any significant shifts required of them. We will support the sector to understand these shifts and monitor progress.

Investing more in priority or high-demand provision will require TEC to actively disinvest from other areas of provision. This is also likely to require careful management of the network of provision to minimise negative impacts for learners.

Support for employers is essential for growing work-integrated and work-based learning and industry collaboration

We welcome the goal to support more work-integrated and work-based learning. One potential barrier to achieving this goal is the capacity and capability of employers who are willing to take on interns, trainees, and apprentices.

Engaging in work-based and work-integrated learning has substantial benefits for employers but also requires upfront investment of time and resources. This can be prohibitive for many employers, especially in the small to medium enterprises that comprise much of our economy. Overseas other incentives are in place to support things like degree apprenticeships.

We recommend considering how settings and incentives across the education and employment systems can interact to grow work-integrated and work-based learning. This includes clear connections with Going for Growth initiatives across government.

A broad base of fundamental research is an essential foundation for commercialisation and targeted research

We support the TES's aim to lift the social and economic impact of research. But a narrow focus on applied research and commercialisation may undermine this impact and constrain innovation. We recommend a combined focus on both applied and fundamental research.

A robust research and innovation ecosystem relies on diverse portfolios across fundamental, stewardship, and applied research. Basic or fundamental research can lead to economically valuable discoveries, with commercialisation and impact built off this foundational activity, rather than occurring in isolation. An overly prescriptive research funding model may constrain innovation. Focussing too much on commercialisation through the pathway of applied research may mean the many serendipitous discoveries arising from fundamental research that have a commercial outcome are missed.

Developing effective new measures will take time and add a level of compliance

We currently collect a broad range of data to fulfil our legislated function of monitoring the tertiary system. Central to this are our *Educational Performance Indicators* (EPIs), including participation, retention, and course and qualification completion rates. These indicators are essential for building a well-rounded picture of provider and system performance.

The TES seeks more effective monitoring of learner achievement and notes current gaps in existing EPIs, noting that distance travelled has been very difficult to measure reliably to date. It suggests developing new measures of learners' progress over their study period (distance travelled) and the graduates' labour market outcomes. The TES puts a new emphasis on collaboration and research impact, which are both areas where we do not currently measure performance.

We support the development of these new measures to complement our current EPIs. Improved monitoring in these areas would provide valuable information about system performance to help guide government policy, investment, and information for learners. This will lead to better outcomes for learners and contribute to economic growth.

It’s important to have realistic expectations about the work and time it will take to develop effective measures and implement them.

New measures need broad buy in from TEOs. Questions about methodology (what we measure, how, and what weighting we give to various factors) can be contentious, especially if the measures are intended to serve as performance indicators.

New measures are likely to increase the reporting required of the sector, which may be seen as adding another layer of compliance to their operating environment.

- When designing new measures, we need to think about how they will integrate into TEC funding assessments and relate to existing performance measures.
- Implementing new measures can be expensive and time consuming, as TEC and TEOs need to make changes to data infrastructure and reporting processes.
- Once new measures are implemented, it will take time for data to be collected by TEOs, reported to TEC, potentially integrated with other sources (e.g. IDI data), and finally analysed to produce actionable information.

In total, it is likely to take several years for a decision to develop new measures to translate into new information that we can use.

We're pleased to see a continued focus on te ao Māori

We are pleased to see Te Tiriti o Waitangi considered regarding TEO partnerships with hapū and iwi under Priority 4 – Integration and Collaboration. We recommend that the tertiary system’s contribution to Te Tiriti also be considered in other priority areas (especially achievement and participation).

We are also pleased to see the TES acknowledge Wānanga’s unique role and the critical contribution they make to Māori learners achieving their aspirations and growing the Māori economy. Better outcomes for Māori and a thriving Māori economy are key contributors to New Zealand’s broader economic growth.

TEU | TERTIARY EDUCATION UNION
TE HAUTŪ KAHURANGI

Submission of

Te Hautū Kahurangi | Tertiary Education Union

to the

Ministry of Education

on the

Draft Tertiary Education Strategy

30 September 2025

CONTACTS

9(2)(a)

1. INTRODUCTION

1.1. Te Hautū Kahurangi | Tertiary Education Union (TEU) welcomes this opportunity to respond to the *Draft Tertiary Education Strategy*.

1.2. The TEU is the largest union and professional association representing 12,000 academic and general/allied staff in the tertiary education sector (in universities, institutes of technology/polytechnics, wānanga, private training establishments, and rural education activities programmes).

1.3. The TEU actively acknowledges Te Tiriti o Waitangi as the foundation for the relationship between Māori and the Crown. We recognise the significance of specific reference to Te Tiriti in the Education Act and the emergent discourse resulting from this. We also accept the responsibilities and actions that result from our nation's signing of the UN Declaration on the Rights of Indigenous Peoples.

1.4. The TEU expresses its commitment to Te Tiriti by working to apply the four whāinga (values) from our *Te Koeke Tiriti* framework as a means to advance our TEU Te Tiriti relationship in all our work and decision-making – with members and when engaging on broader issues within the tertiary sector and beyond – such as our response to the *Draft Tertiary Education Strategy*:

> *Tū kotahi, tū kaha – We are strong and unified; we are committed to actions which will leave no-one behind; we create spaces where all people can fully participate, are fairly represented, and that foster good relationships between people.*
>
> *Ngā piki, ngā heke – We endure through good times and bad; we work to minimise our impact on the environment; we foster ahikā – the interrelationship of people and the land, including supporting tūrangawaewae – a place where each has the right to stand and belong.*
>
> *Awhi atu, awhi mai – We take actions that seek to improve the lives of the most vulnerable; we give and receive, acknowledging that reciprocity is fundamental to strong and equitable relationships; and we work to advance approaches that ensure quality public tertiary education for all.*
>
> *Tātou, tātou e – We reach our goals through our collective strength and shared sense of purpose, which are supported through participatory democratic decision-making processes and structures.*

1.5. Our response to the *Draft Tertiary Education Strategy* stems from our commitment to the whāinga expressed above and our wish to see these enacted in the tertiary education sector and in our society and communities.

2. PREAMBLE

2.1. A national strategy is essential to guide the system and set expectations for how tertiary education contributes to the wellbeing of Aotearoa New Zealand. While the draft TES identifies key areas of focus, it frames these priorities too narrowly through the lens of economic growth and productivity. This diminishes the broader civic, cultural, environmental, and social purposes of tertiary education, and overlooks the central role of staff and students in sustaining the system. At a time when many countries are grappling with similar challenges of balancing economic imperatives with equity, academic freedom, and sustainability, Aotearoa New Zealand has the opportunity to set an international example by adopting a more holistic and future-focused vision for tertiary education.

2.2. Tertiary education strengthens our democracy by fostering independent, critical thinking and providing the knowledge base for informed public debate. It supports social cohesion by bringing together diverse communities, creating shared spaces of learning, and equipping people with the skills to navigate difference with understanding and respect. It advances cultural identity and expression by sustaining te reo Māori, mātauranga Māori, Pacific knowledge systems, and the creative arts, ensuring that Aotearoa's unique cultural life thrives. In all of these ways, tertiary institutions contribute far more than simply preparing people for employment — they underpin the civic fabric of society.

2.3. None of these contributions are possible without staff. Academic and general staff are the foundation of teaching, research, and student support, yet their working conditions have been steadily eroded by underinvestment which in turn leads to rising casualisation and excessive workloads. Student learning conditions are inseparable from staff working conditions: where staff are secure in their employment, well-resourced, and respected, students are better able to succeed. The draft TES does not acknowledge this relationship, and by omitting it, fails to recognise one of the most fundamental drivers of educational quality and achievement.

2.4. It is also concerning that the draft TES makes no reference to the role of tertiary education in advancing environmental sustainability or responding to climate change. The sector is uniquely placed to lead in this area: through research that generates new knowledge and technologies for mitigation and adaptation; through teaching that equips learners with the skills, values, and critical

understanding needed for a just transition; and through institutional practices that model sustainability in energy use, transport, procurement, and campus life. Tertiary institutions are also sites where communities can come together to debate and shape responses to the climate crisis, ensuring that policy and innovation are informed by evidence and by diverse perspectives. By omitting any recognition of this role, the draft TES neglects one of the defining responsibilities of education in the 21st century.

2.5. As indicated in our recommendations, it is our view that the TES needs to be rebalanced to ensure it recognises the full value of tertiary education: economic, civic, cultural, social, and environmental. Only by embedding equity, Te Tiriti o Waitangi, decent work for staff, and the public-good role of education at its core can the strategy deliver a system that genuinely serves all people of Aotearoa New Zealand.

3. SUMMARY OF RECOMMENDATIONS

PRIORITY	RECOMMENDATION
Priority 1: Achievement	1. Broaden the definition of achievement to include civic, cultural, and intellectual development alongside qualification completions and employment outcomes. 2. Address systemic barriers to student success — including financial hardship, racism, ableism, and inadequate support — through stable public investment. 3. Recognise the direct link between staff working conditions and student learning conditions by embedding commitments to decent work and secure employment for tertiary staff.
Priority 2: Economic Impact and Innovation	4. Balance economic objectives with recognition of tertiary education's civic, cultural, and democratic roles. 5. Ensure Industry Skills Boards and other governance structures include staff, union, student, and iwi representation to prevent employer capture. 6. Safeguard curiosity-driven and investigator-led research across disciplines from being overshadowed or displaced by commercialisation targets.
Priority 3: Access and Participation	7. Reframe access as an equity and Te Tiriti o Waitangi obligation, not just a driver of productivity.

	8. Sustainably fund regional polytechnics and foundation education, with stable governance and secure staffing. 9. Ensure flexible provision (online, blended, micro-credentials) complements, rather than substitutes, full qualifications and protects both equity of access and staff employment conditions.
Priority 4: Integration and Collaboration	10. Broaden collaboration to include social, cultural, and Te Tiriti o Waitangi-based partnerships, not just industry alignment. 11. Address structural barriers — such as competitive funding and insecure staffing — that undermine collaboration. 12. Resource and recognise staff contributions to integration work, ensuring collaboration strengthens both institutions and the working lives of staff.
Priority 5: International Education	13. Reframe international education as a reciprocal partnership focused on student wellbeing, intercultural exchange, and high-quality teaching and research. 14. Resource staff and student services proportionately with international enrolments to protect quality and prevent staff overload. 15. Link growth strategies to commitments to decent work for staff and protections for international student rights. 16. Establish sustainable limits on international enrolment growth to safeguard educational quality, student wellbeing, and staff working conditions.
General	17. Explicitly acknowledge the role of tertiary education in advancing environmental sustainability and responding to climate change, embedding this responsibility either as a standalone priority or across all priorities.

4. PRIORITY 1: ACHIEVEMENT

4.1. TEU acknowledges that improving student achievement is a central responsibility of the tertiary education system; we want students to succeed and complete their qualifications. But equating achievement primarily with labour market outcomes overlooks the broader purposes of tertiary education. As set out in the Education and Training Act 2020, universities are required to act as the "critic and conscience of society," and all tertiary institutions contribute to social, cultural, and civic life as well as economic prosperity. If achievement is reduced to whether students

complete a qualification that secures them employment, the system will undervalue creativity, critical thinking, and the personal and collective benefits of education that extend beyond the workplace.

4.2. The draft TES also underplays the systemic barriers that undermine learner success. Māori, Pacific peoples, learners living with disabilities, and other marginalised students continue to face disproportionately low rates of completion, but these disparities cannot be overcome simply through institutional accountability or performance metrics. Structural factors such as financial hardship, racism and discrimination, inadequate disability support, and insecure housing directly affect retention and progression. This requires a commitment to properly funding students in their learning journey and institutions in providing adequate pastoral and academic support.

4.3. In addition, the increasing casualisation of tertiary staff erodes the continuity and quality of support that students require. Unless these underlying issues are addressed through public investment and policy settings, the expectation that providers will "lift completion rates" is unrealistic and risks penalising institutions and learners alike.

4.4. Achievement is also closely tied to staff wellbeing and working conditions. International research consistently demonstrates that student outcomes improve when staff have secure employment, manageable workloads, and the resources needed to provide personalised teaching and support.[1] The removal of staff wellbeing as a distinct priority from the current TES is therefore a significant omission. The success of learners depends on the stability and capability of the staff who teach and support them; it is our view that this relationship must be explicitly recognised in the framing of achievement.

Commentary on Priority 1 contributing activities

4.5. The contributing activities listed in the draft TES are uneven in scope and ambition. Initiatives such as "distance travelled" measures and Disability Action Plans are welcomed but will remain tokenistic if not properly resourced and implemented.

4.6. Similarly, the emphasis on kaupapa Māori provision and foundation education programmes is essential, yet these areas have historically suffered from unstable

[1] See https://www.oecd.org/en/publications/benchmarking-higher-education-system-performance_be5514d7-en.html

funding. Without sustained investment, such commitments will remain aspirational rather than transformative.

4.7. The proposed alignment of achievement with employment outcomes must also be treated cautiously: employment opportunities are shaped by labour-market conditions that providers cannot control, and there is a danger that the tertiary education sector will be judged by factors outside its remit. A more balanced approach would be to support providers with the resources to both address barriers to student achievement and ensure measurements of success which reflect both academic progress and the broader purposes of tertiary education.

Priority 1: Achievement – recommendations

4.8. The TES should broaden its definition of achievement to encompass civic, cultural, and intellectual development alongside qualification completions and employment outcomes.

4.9. The Government should address structural barriers to learner success by resourcing comprehensive student support, reducing financial hardship, and recognising the impact of staff working conditions on student achievement.

4.10. The contributing activities under this priority should be underpinned by stable, long-term investment to ensure that kaupapa Māori provision, Disability Action Plans, and foundation education are delivered effectively and equitably.

4.11. The TES should explicitly acknowledge the direct link between student learning conditions and staff working conditions, committing to decent work and secure employment for tertiary staff as a necessary foundation for learner achievement.

5. PRIORITY 2: ECONOMIC IMPACT AND INNOVATION

5.1. We recognise that tertiary education has an important role in contributing to economic life through research, innovation, and the development of graduates with knowledge and skills. However, the draft TES places excessive weight on productivity and labour-market outcomes, framing education primarily as an instrument of economic growth. This emphasis narrows the mission of tertiary education, sidelining its civic, cultural, and intellectual contributions. The broad value of tertiary learning — as a source of critical thinking, democratic participation, and cultural enrichment — will be undermined when economic performance becomes the dominant measure of success.

5.2. A further concern lies in the proposed governance and influence of employers and Industry Skills Boards (ISBs). While employer perspectives are valuable in

shaping relevant vocational provision, industry-dominated governance can undermine the diversity of voices that should guide education. Academic staff, students, unions, iwi, and communities must play an equal role in determining the direction of tertiary programmes. Over-reliance on employer needs will lock the system into short-term definitions of skills, eroding the academic independence required for long-term innovation and creativity.

5.3. The prioritisation of research commercialisation is also problematic if pursued without balance. While applied research has an important role, the history of higher education shows that many transformative discoveries have come from investigator-led, curiosity-driven research. Tying research too closely to immediate commercial outcomes threatens to erode academic freedom and compromise the statutory responsibility of universities to act as the "critic and conscience of society." It is likely to also stimy the desired innovation and productivity sought by the Government by narrowing what research is carried out in our universities. In addition, pressure to generate commercial returns can divert resources away from social, artistic, cultural, or indigenous research, and reduce the level of research on Aotearoa and our local needs, as these do not lend themselves easily to monetisation but they are of immense public value.

Commentary on Priority 2 contributing activities

5.4. The contributing activities under this priority highlight knowledge transfer, research commercialisation, entrepreneurial education, AI leadership, ISB guidance, and stronger links with the Māori economy. These aims cannot be pursued effectively without safeguards.

5.5. For example, knowledge transfer should extend to social and cultural innovation, not just commercial partnerships. AI leadership must incorporate ethical and equity frameworks, not simply technical expertise. ISBs should be structured to ensure democratic representation, avoiding employer capture. Partnerships with the Māori economy must be anchored in tino rangatiratanga, rather than framed solely in economic terms.

5.6. Taken together, the activities show ambition, but without explicit protections for academic freedom, staff and student voices, and kaupapa Māori principles, they will reshape tertiary education into a narrow economic utility.

Priority 2: Economic Impact and Innovation – recommendations

5.7. The TES should balance its economic objectives with explicit recognition of tertiary education's civic, artistic, cultural, and democratic roles, ensuring these are given equal weight to productivity and innovation goals.

5.8. The Government should require that Industry Skills Boards and other governance mechanisms include representation from staff, students, unions, and iwi, protecting democratic decision-making and preventing employer capture.

5.9. The TES should safeguard curiosity-driven research and academic freedom by ensuring that research commercialisation targets do not overshadow or displace investigator-led research or limit the public-good contributions of tertiary scholarship.

6. PRIORITY 3: ACCESS AND PARTICIPATION

6.1. We strongly support access and participation as a priority for tertiary education, but we are concerned that the draft TES frames access primarily in terms of its contribution to a "productive economy." While the strategy rightly notes that participation rates have declined for some groups and remain disproportionately low for Māori, Pacific peoples, learners living with disabilities, and those from marginalised backgrounds, it does not sufficiently foreground equity, social justice, or Te Tiriti o Waitangi obligations.

6.2. Participation is not only about numbers in classrooms but also about addressing systemic barriers such as financial hardship, racism, ableism, and the high cost of living. Unless these structural issues are explicitly tackled, widening access will inevitably be reduced to a rhetorical goal rather than a substantive commitment.

6.3. The draft TES places considerable emphasis on flexible modes of delivery — including online learning, blended provision, and micro-credentials — as solutions to access challenges. While such options may benefit some learners, they also carry risks if quality and equity safeguards are not built in. Digital divides and affordability of devices remain significant barriers for many learners. Moreover, an over-reliance on fragmented short-course provision can undermine progression into higher-level qualifications and exacerbate workforce casualisation for staff. Access is not only a question of entry points, but of creating sustainable, high-quality educational journeys that allow learners to thrive.

6.4. The vocational education and training sector has faced prolonged disruption from recent structural reforms, and staff, students, and communities have lost confidence in the stability of local provision. Rebuilding trust requires stable governance, secure staffing, and long-term investment rather than piecemeal

initiatives. If regional participation is to be strengthened, polytechnics must be funded and empowered to act as genuine anchors for local skills, cultural development, and community life, not just as training pipelines for industry.

Commentary on Priority 3 contributing activities

6.5. The contributing activities under this priority touch on rebuilding regional polytechnics, supporting foundation education, expanding secondary–tertiary pathways, growing online provision, and increasing the use of micro-credentials.

6.6. These are all important areas, but their effectiveness depends on whether they are adequately resourced and implemented in ways that protect equity and quality.

6.7. Foundation education has often been the first to face cuts in times of fiscal restraint, yet it is crucial for enabling young people with limited prior attainment to re-engage in learning. Similarly, credit-transfer and mobility between providers are worthwhile goals, but without consistent national frameworks, they will become bureaucratic hurdles. Taken together, the activities must be anchored in a clear equity lens, otherwise they will not meaningfully change participation patterns for under-served groups.

Priority 3: Access and Participation – recommendations

6.8. The TES should reframe access and participation as an equity and Te Tiriti o Waitangi obligation, ensuring that systemic barriers such as cost, racism, and ableism are explicitly addressed alongside widening participation.

6.9. The Government should ensure sustainable investment in regional polytechnics and foundation education, with secure staffing and governance structures that restore confidence and provide stable pathways for learners and strong connections with employers.

6.10. The strategy should treat flexible provision (online learning, blended modes, and micro-credentials) as complementary to, rather than substitutes for, full qualifications, with strong safeguards to protect equity, progression, and staff working conditions.

7. PRIORITY 4: INTEGRATION AND COLLABORATION

7.1. We agree that stronger collaboration across the tertiary sector and with external partners can enhance outcomes for students, communities, and the economy.

7.2. However, the draft TES frames collaboration largely as a mechanism for aligning education with labour-market needs and for increasing research commercialisation. This framing undervalues other essential forms of integration — particularly partnerships that strengthen social cohesion, uphold Te Tiriti o Waitangi, and support inclusive learning environments. Collaboration must be defined more broadly to encompass genuine partnerships with iwi, communities, staff, and students, rather than being restricted to institutional relationships with employers and industry.

7.3. There is also a danger that the strategy assumes collaboration will naturally emerge if signalled as a priority, without recognising the structural barriers that currently inhibit it. Competitive funding models, short-term contracts, and precarious staffing arrangements all undermine trust and continuity between institutions, communities, and industry. Staff are often expected to take on collaborative work — such as joint curriculum design, community engagement, or industry partnerships — without adequate recognition, workload relief, or professional development support. Integration will not succeed if it relies on unpaid or under-valued labour from already over-stretched staff. Ensuring that collaboration is properly resourced, embedded in institutional strategies, and linked to decent work is essential.

7.4. The emphasis on iwi and hapū partnerships is welcome, but it must go beyond symbolic references. Collaboration with Māori must be grounded in tino rangatiratanga and adequately funded to ensure that iwi and hapū are equal partners, not simply stakeholders. Similarly, collaboration between universities and Public Research Organisations should not only be measured in terms of commercial outputs, but also in terms of public benefit and knowledge-sharing. Staff at all levels, from academic researchers to general staff, are essential to building and sustaining these partnerships, and their expertise and labour must be recognised as integral to integration and collaboration.

Commentary on Priority 4 recommendations

7.5. The contributing activities for this priority — such as regional collaboration between providers, greater sharing of infrastructure, and stronger alignment with employers and industry — will not succeed without deliberate measures to address workload pressures, secure staffing, and institutional competition.

7.6. For example, joint curriculum delivery across institutions requires time, resources, and recognition for staff who carry out the integration work. Partnerships with employers can only be effective if staff have the capacity and autonomy to co-design meaningful programmes, rather than being directed to

deliver pre-determined outcomes. If collaboration is treated as an add-on rather than a core resourced activity, it will falter.

7.7. The TES must acknowledge that integration is not only about institutional structures but also about the working conditions of the staff who implement them.

Priority 4: Integration and Collaboration – recommendations

7.8. The TES should broaden its definition of integration and collaboration to emphasise social, cultural, and Te Tiriti o Waitangi-based partnerships alongside economic and industry relationships.

7.9. The Government should remove structural barriers to collaboration by addressing competitive funding settings and ensuring staff workloads, recognition, and employment conditions enable genuine partnership work.

7.10. Collaboration initiatives should be underpinned by stable funding and explicit recognition of staff contributions, ensuring that integration strengthens both institutional relationships and the working lives of those delivering education and research.

8. PRIORITY 5: INTERNATIONAL EDUCATION

8.1. TEU acknowledges the value of international education as a means of building global connections, enriching Aotearoa New Zealand's tertiary system, and supporting intercultural understanding.

8.2. However, the draft TES frames international education primarily as an export industry to be doubled in value by 2034. This narrow economic framing commodifies international students, treating them more as revenue streams than as learners and members of our communities. A robust strategy for international education must place educational quality, student wellbeing, and reciprocal exchange at its centre, rather than prioritising marketing and enrolment targets.

8.3. The draft TES does not adequately address the risks posed by rapid international education growth. Staff workloads, already stretched by underfunding and casualisation, will increase further if student numbers are expanded without additional investment in teaching, support, and infrastructure. Likewise, the quality of the student experience depends not only on immigration and marketing settings but also on the availability of well-resourced student services

and secure, adequately supported staff. Without these conditions, rapid growth will come at the expense of both international and domestic learners.

8.4. The potential contribution of international education to research, innovation, and community development is also underplayed. International students and scholars enrich our institutions through diverse perspectives and global linkages. Yet if international education is reduced to "bums-on-seats" targets, these broader benefits will be sidelined. Moreover, there is little acknowledgment that international partnerships should be reciprocal, contributing to the development of partner countries and communities rather than being framed solely as economic opportunities for Aotearoa New Zealand.

Commentary on Priority 5 contributing activities

8.5. The contributing activities — including global marketing campaigns, agent networks, AI-driven recruitment tools, and immigration settings — prioritise enrolment growth without sufficient attention to student welfare or staff capacity.

8.6. Marketing strategies cannot substitute for investment in the teaching and support infrastructure that sustains high-quality education. Nor can AI recruitment systems or improved agent models ensure genuine intercultural exchange. For international education to be sustainable and ethical, the TES must commit to protecting educational standards, ensuring fair employment for staff, and embedding student wellbeing in every aspect of delivery.

Priority 5: International Education – recommendations

8.7. The TES should reframe international education as a reciprocal partnership focused on educational quality, student wellbeing, and intercultural exchange, rather than primarily as an export industry.

8.8. The Government should commit to resourcing staff and student support services proportionately with international student enrolments, ensuring that growth does not undermine quality or overload staff.

8.9. International education targets should be accompanied by explicit commitments to decent work for staff, high-quality teaching and research conditions, and protections for the wellbeing and rights of international students.

8.10. The TES should establish limits on international enrolment growth to safeguard educational quality, student wellbeing, and staff working conditions. Some tertiary education institutions have already taken step to moderate enrolments in order to preserve the quality of teaching and support available to both

domestic and international students. Embedding a similar principle within the national strategy would ensure that international education remains sustainable, reciprocal, and firmly anchored in the public-good mission of tertiary education.

9. CONCLUSION

9.1. TEU welcomes the opportunity to comment on the draft TES and supports the aim of strengthening outcomes for learners, institutions, and communities.

9.2. However, we are concerned that the draft TES frames tertiary education too narrowly as an instrument of economic growth, often sidelining its civic, cultural, environmental, and democratic purposes. By focusing heavily on labour-market alignment, commercialisation, and export revenue, the strategy neglects equity, wellbeing, and the statutory role of universities as the "critic and conscience of society." It also underplays the significance of tertiary education in preparing learners and researchers to respond to the existential challenges of environmental sustainability and climate change — areas where the sector must lead with knowledge, innovation, and public engagement.

9.3. For the TES to be genuinely transformative, it must embed commitments to equity, Te Tiriti o Waitangi, academic freedom, environmental responsibility, and decent work for staff across all priorities. Student learning conditions are inseparable from staff working conditions, and sustainable outcomes require secure employment, manageable workloads, and robust support services.

9.4. We urge the Government to adopt a more balanced strategy — one that recognises the public-good value of tertiary education, invests in the people who deliver it, and ensures all learners can thrive, not only as future workers but as active participants in a fair, democratic, and environmentally sustainable Aotearoa New Zealand.

30 September 2025

Tertiary Education Strategy Consultation
Ministry of Education
PO Box 1666
WELLINGTON 6140

By email: tertiary.strategy@education.govt.nz

Targeted Consultation on Tertiary Education Strategy - TIA Submission

Tourism Industry Aotearoa (TIA) welcomes the opportunity to submit on the Ministry of Education targeted consultation on the draft Tertiary Education Strategy.

Tourism Industry Aotearoa

TIA is the peak body for the tourism industry in Aotearoa New Zealand. With around 1,200 member businesses, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure activities, attractions, retail, airports and airlines, transport, as well as related-tourism services.

Together, these sectors directly and indirectly employ 303,420 people, or 10.7% of the New Zealand workforce.[1]

TIA is sharply focused on ensuring the balanced growth of tourism and this is articulated in our key guiding documents and programmes. This includes the tourism industry's strategic framework, *Tourism 2050 – A Blueprint for Impact, He Pae Tukutuku, with the* Vision of 'Enriching Aotearoa New Zealand through a flourishing tourism ecosystem'.[2]

Tourism 2050 has ten Actions covering the most important strategic workstreams, with one focussed on the tourism workforce. This being:

- **Grow the Tourism Workforce.** To establish a concerted focus on ensuring the tourism industry has the people it needs to operate effectively in providing quality experiences to our visitors. Areas of focus include training, education, pipelines into the industry, seasonality, population distribution and being great employers.

TIA has been advancing this Action in several ways, including ensuring tourism operators are 'Employers of Choice' as part of TIA's Tourism Sustainability Commitment, engaging with Government education and workforce-related policies, supporting the development of tourism workforce forecasts; and improving career pathways of people in the industry.

As part of this work, TIA has contributed to the Vocational Education and Training reform process[3], the NCEA reforms[4] and now on the Draft Tertiary Education Strategy. Together, these submissions set out TIA's position on the workforce pipeline, the changing nature of tourism jobs in the AI environment, the ongoing professionalisation of the industry and the essential role of vocational jobs. TIA encourages the Ministry to read these submissions as adjuncts to this submission.

[1] Stats NZ, Tourism Satellite Account, Year-ended March 2024.
[2] https://www.tia.org.nz/tourism-2050/
[3] https://www.tia.org.nz/assets/Uploads/Submission-on-VET-Bill-18-June-2025.pdf
[4] https://www.tia.org.nz/assets/Submission-on-Proposed-changes-to-NCEA-15-September-2025.pdf

Government Growth Agenda

In February 2025, the Government established its 'Going for Growth' agenda as a comprehensive approach to lifting living standards and stimulating faster economic growth.

TIA supports this agenda and recognises that tourism, as our #2 export industry and with capacity to quickly grow, will have a vital role to play in driving growth across the wider economy.

TIA welcomed the June 2025 launch of the Tourism Growth Roadmap by the Hon. Louise Upston, the Minister of Tourism and Hospitality, to grow the tourism industry, with the target to double international visitor expenditure by 2034.

In setting this agenda for tourism growth, seven supply-side workstreams have been identified, including one directly on the tourism workforce:

- **Workforce.** An increased skilled domestic tourism and hospitality workforce is set up for the future.

The Ministry of Business, Innovation and Employment is advancing the Roadmap at present, with wide engagement across the tourism industry, including TIA. The workforce stream is underway with Ringa Hora engaged by MBIE to run a process to assess industry workforce needs and to set out the steps needed to ensure the tourism workforce under the Government's doubling of international tourism expenditure target.

The strategic objectives for industry and government are highly aligned around the need to develop the tourism workforce to support and enable growth.

Tourism Industry

Tourism is a major part of the New Zealand economy. It makes up 7.5% of GDP, 10.7% of employment and 17.2% of exports. Total visitor expenditure in the year to March 2024 was $44.4b, comprising $17b of international tourism and $27.5b of domestic tourism. Government receives an average of $542 of GST income from each of our international visitors.[5]

At one fifth of our export economy and one in ten jobs, tourism matters, and the systems we set up to support and enable tourism matter equally.

Key Submission Points

TIA's responses to the consultation questions are set out in Attachment 1.

Overall, TIA supports the strategic direction of the draft Tertiary Education Strategy. However, we are concerned at the lack of important information or pointers within it that create space for the education and research requirements of important wealth-generating industries such as tourism. TIA's two key points:

1. It is unstated how and where the needs of the tourism industry will sit in the Tertiary Education Strategy. We see tourism within the Economic Impact and Innovation priority, but we are not sure that the Strategy itself intends this. From TIA's perspective, tourism is one-fifth of our export economy and one job in ten and is a key part of the Government's 'Going for Growth' agenda. Ensuring a skilled and trained tourism workforce across all the levels from entry to highly trained professional roles to senior management roles is a prerequisite for the industry meeting this target.

[5] https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2024/

Recommendation: Include reference in the Tertiary Education Strategy that the scope of the document includes the tourism industry as a significant component of the New Zealand economy and society with distinct and evolving workforce and research needs.

2. We submit that the other related government documents must align with the Tertiary Education Strategy. For instance, the Tertiary Education Commission's Plan Guidance for providers submitting investment plans for funding from 1 January 2026 sets out the sector-specific higher education targeted priorities (page 26), but this does not include reference to tourism.

   Recommendation: Ensure the references to tourism as set out above are mapped across the other key strategic documents that shape the tertiary education and research environments.

Conclusion

We would be very pleased to support this submission with further information. If so, please contact 9(2)(a) @tia.org.nz.

Many thanks for your consideration of this submission.

Ngā mihi,

9(2)(a)

Attachment 1: TIA Response to Consultation Questions

Question	TIA Response
Priorities	TIA supports a tertiary education system that drives economic growth which we see as the focus of the Strategy. With tourism comprising one fifth of New Zealand's export economy and with the Government establishing its Tourism Growth Roadmap, it is essential that tourism forms a clear and obvious component of the Strategy. With tourism making up 10.7% of jobs in New Zealand, it is also essential that the education system is contributing to the quality and productivity of these jobs. As an industry that is becoming increasingly reliant on innovation, technology uptake and 'new' jobs in the AI environment, having a workforce that is ready and able to think critically and make changes will be important. TIA considers the five priorities to be sound and reflective of the intent of Government from the tertiary education system. The critical factor is that tourism must be clearly included within the ambit of the Strategy.
Priority 1: Achievement	TIA supports the direction of this priority.
Priority 2: Economic Impact and Innovation	As the industry association for New Zealand's second largest export sector, TIA supports the focus on economic impact and innovation. Tourism can see itself in this priority, but it is not clear that others will draw the same conclusion. As such, TIA calls for more direct articulation that tourism is included within this Economic Impact and Innovation priority.
Priority 2: Access and Participation	TIA supports the direction of this priority. A critical aspect for tourism is the overall education pathway, from school to tertiary education (university and vocational education). It is for this reason the TIA has submitted extensively to the NCEA and vocational education and training reforms, and now on the tertiary education system. These three parts of the education system must be well aligned and complementary.
Priority 4: Integration and Collaboration	TIA supports the direction of this priority. In terms of tourism university programmes, they each have distinctive strengths and as the peak industry association, we value what they inject into the overall tourism system. Our wish that there would be more industry-relevant university-provided research, we look to this Strategy as well as the wider science and innovation programmes of Government to drive shifts in this area. Again, clearly stating the place of tourism is important.
Priority 5: International Education	TIA supports the direction of this priority. It is important to recognise that university-level tourism programmes have been well supported by international students prior to the pandemic, but that these numbers have not yet fully recovered.

	TIA supports the intent of this priority to boost the international education aspect of the tertiary education system. In this, TIA encourages the Strategy to set out the competitiveness of the system, including costs in what is a highly competitive sector internationally.
Delivering the Strategy	TIA notes that there are a lot of changes underway in the education system and these need to be progressively implemented. For instance, the Industry Skills Board will be a vital part of both the secondary school and vocational pathway, and these need to be established and operational. TIA is concerned that the overall tenor of the changes across the education and training system will not serve tourism well, and we are equally concerned that we will not establish whether this is the case until many years down the track. If this is the case, the costs for tourism will be serious and consequential. The implications will include lower industry growth, lower levels of value add, lower productivity, and continuation of low quality tourism jobs, rather than a switch to increased highly skilled professional roles.
Monitoring Outcomes	TIA supports the direction of this priority. The key success measures for each of the five priorities appear to be good and reasonable. TIA notes the measure to double the value of international education to $7.2 billion by 2034, which mirrors the tourism industry target of Government to double tourism exports to $19.8 b by 2034. The tourism and export education sectors will need to work closely together to achieve these targets, again reinforcing to need to clearly state the place of tourism within the Strategy.

Toi Mai Workforce Development Council | Ohu Ahumahi
Website: www.toimai.nz
Phone: 04 909 0316
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Toi Mai submission on the Tertiary Education Strategy

Toi Mai is the workforce development council for the creative, cultural, recreational and technology industries.

We are an independent statutory entity established under s366 of the Education and Training Act 2020. Our legislative functions include standard setting and providing investment advice to TEC, which we do by identifying gaps and needs in workforce skills and training through industry engagement and research. Toi Mai was established to act as an advisor to government and oversee vocational-level qualifications for the creative, cultural, recreational and technology industries.

Our vision is that Aotearoa has confidence in and aspiration for our sectors and sees them as crucial to our success as a nation.

Our purpose is to ensure our industries are supported by a skilled, thriving and sustainable workforce. We do this through developing qualifications and standards, and providing trusted advice to government, industry and education providers about what needs to change to ensure our industries have the skills they need.

Skills, not qualifications need to be prioritised in a forward-looking strategy to help New Zealand achieve its economic potential

Toi Mai's recent research across the creative and technology industries has identified a critical disconnect between what the education system produces and what industry requires. Our *Skills in the Creative Sector* report found that employers consistently prioritise practical capabilities, problem-solving skills, and adaptability over formal qualifications. The current tertiary system, including the proposed TES, continues to focus primarily on qualifications as a proxy for skills – meaning incentives encourage providers to develop qualifications and programmes that maximise revenue, rather than the development of relevant, applicable skills that drive economic productivity.

This distinction represents a fundamental misalignment that constrains New Zealand's economic potential. Our research demonstrates that creative and technology industries value skills that transcend traditional qualification boundaries: digital fluency, creative problem-solving, collaborative working methods, and rapid adaptation to emerging technologies. The TES, while acknowledging the importance of skills, still structures its priorities around qualifications that may be increasingly irrelevant to our economic needs. The timeframes to develop qualifications and fund programmes inhibit and prevent innovation, particularly for creative and technology industries, who are most impacted by the rise of Artificial Intelligence and its associated disruption.

Until government policy explicitly recognises and prioritises skills, we will continue to get qualifications that are less likely to meet industry needs – and the tertiary education system will continue to underperform in its fundamental purpose of supporting economic growth and innovation. Focusing on skills requires a fundamental reframing of how we measure success, allocate funding, and structure learning opportunities.

Building a National Skills Strategy would help lift productivity and deliver transformational change to New Zealand's future workforce

The proposed TES lacks the comprehensive strategic framework necessary to deliver transformational change. Toi Mai's research, *Te Pūaotanga – The New Dawn*, demonstrates the need for a National Skills Strategy that transcends the traditional boundaries of tertiary education to encompass workforce development, industry collaboration, and economic transformation. The proposed TES is backward looking and uses outdated funding models and structures and, as a result, will produce the same outcomes as previous strategies.

Furthermore, Toi Mai supports the establishment of a National Skills Agency, as outlined in *Te Pūaotanga*. Such an agency would provide the strategic coordination, industry intelligence, and adaptive capacity that the current fragmented system cannot and will not deliver. This recommendation aligns with international best practice and would position New Zealand to respond more effectively to the workforce challenges identified in the TES.

Work-based learning needs to be re-imagined in order to tap into New Zealand's creative and technology workforces

Toi Mai supports the Strategy's focus on increased work-based learning and hybrid learning opportunities, but the current conceptualisation of work-based learning remains anchored in traditional trade-based apprenticeship and traineeship models that are fundamentally misaligned with the needs of creative and technology industries.

Our research across these sectors demonstrates that effective work-based learning requires sophisticated, flexible approaches that can accommodate the project-based, collaborative, and rapidly evolving nature of contemporary creative and technology work. The current TES proposes no re-thinking or re-scoping of work-based and work-integrated models. International examples demonstrate the potential for higher-level work-based learning models. In the United Kingdom, for example, creative industries apprenticeships operate at bachelor degree level.

Similarly, Germany's dual education system extends beyond traditional trades to encompass media production, digital design, and technology development at levels that align with industry requirements. These programmes integrate academic learning with practical application in ways that produce graduates who are immediately productive in high-skill, high-value roles.

New Zealand's current apprenticeship levels, predominantly focused on Levels 2-4, are inadequate for creative and technology industries that require capabilities equivalent to higher-level education and skills but delivered through practical, project-based training. The TES should commit to developing work-based learning pathways at Levels 5-7 that reflect the skill requirements of the creative and technology sectors.

Industry Skills Boards need to be empowered to have an all-qualification levels approach and industry voice should not be constrained to Levels 1-6. ISBs should be the conduit to provide support, industry voice and advice—at regional and national level—across the entire tertiary education sector, including universities.

The way tertiary education is funded in New Zealand has created perverse incentives for training providers and produced the wrong kind of graduates for industry

The current tertiary funding system incentivises longer-form qualifications over the delivery of relevant skills to workforces and industry. Providers have adapted their business models to funding, not industry need. This fundamental misalignment constrains the system's ability to respond effectively to economic needs and perpetuates the disconnection between educational outputs and industry requirements.

Toi Mai's industry engagement reveals consistent feedback that employers value short, intensive skill development programmes that can be integrated with work responsibilities and delivered in response to immediate needs. However, the current funding framework, and lengthy qualification development timelines and processes, favours extended programmes that may have limited relevance to actual workplace requirements. In short, we have created an education industry in and of itself in which industry need is secondary to provider funding.

The TES must commit to funding reform that rewards outcomes rather than inputs, specifically the development of relevant skills that demonstrably contribute to economic productivity. This requires moving beyond completion rates and employment statistics to measure actual skill development, workplace application, and long-term career progression.

Such reform would enable innovative delivery models including meaningful micro-credentials, work-based learning, work-integrated learning, project-based learning, and flexible pathways that accommodate the realities of contemporary work patterns whilst ensuring relevant skill development.

Māori are partners to Te Tiriti and must be at the table for any Tertiary Education Strategy

We should not bury the lead, the TES's approach to Māori participation perpetuates a deficit model by grouping Māori with "under-served communities" rather than recognising Māori as tangata whenua and the Crown's Treaty partner. The TES's current framing fails to acknowledge the unique constitutional position of Māori in Aotearoa and the Crown's specific obligations under Te Tiriti o Waitangi. When Māori are mentioned, it is always in the context of Other, not partners.

Toi Mai's work with Māori communities and businesses demonstrates that effective approaches require genuine partnership based on recognition of Māori knowledge systems, economic aspirations, and self-determination rights. The TES should explicitly acknowledge that improving Māori outcomes requires not just better access to existing systems, but fundamental recognition of mātauranga Māori as a legitimate knowledge system that can contribute to New Zealand's economic development.

The growing Māori economy represents significant opportunities for innovation and growth, particularly in creative industries where cultural knowledge provides competitive advantage in global markets. We cannot leave this advantage to chance. The TES must move beyond remedial approaches to recognise and leverage these opportunities through genuine partnership arrangements.

Industry voice is not funded in the TES

Despite assertions Industry Skills Boards will act as the voice of industry in the Strategy—as Workforce Development Councils have through their establishment—with a reduction of funding and a narrowing of scope towards quality assurance and standard setting, there is a mismatch between the aspirations of what ISBs will do and what they are funded to do.

In addition, Workforce Development Councils were restricted in their ability to carry out what industries wanted as it was up to TEC to accept the advice it received and how it would enact that advice through funding qualifications.

The proposed TES does not address the issues WDCs faced that ISBs will also face, with half the allocated funding resource. We recommend funding be established for ISBs, in response to industry feedback, to directly develop innovation in the training system, through pilots and prototypes which can be tested and scaled as needs be. This funding will be especially useful for the re-establishment of regional polytechnics who will need to respond to training needs in their regions.

International education should be complementary to the domestic tertiary education system but not a central pillar of funding it

Toi Mai does not support the prioritisation of international education in the tertiary education system. While we agree international education is important for New Zealand's position in the world, the TES over emphasises qualification and programme development for international EFTS at the expense of domestic students.

With international student growth placed at the core of training provision in the TES, and direction that providers must develop provision with international growth in mind, perverse incentives will lead to qualification development that prioritises international student work rights and outcomes over genuine education outcomes.

Such a strategy will lead to a return of the poor education outcomes of the previous decade, in which providers prioritised programmes that attracted international students, whose motives were often post-study work rights rather than education. International education should not function as a de facto immigration pathway, one in which international students are exploited for qualifications that are created for fee revenue and not genuine education and work outcomes for domestic students.

International education income, while important to funding the education system, should be complementary and not a central driver of provision.

The TES must develop a roadmap of how the strategy will be implemented

The TES lacks specific mechanisms for translating strategic priorities into actionable outcomes.

The TES places the cost of compliance on providers and makes recommendations what TEC could and should do but it does not propose how monitoring and compliance will be funded.

Government should work collaboratively with industry, iwi, and education providers to develop solutions rather than imposing predetermined approaches. The current TES is top down and has not been developed in partnership with iwi nor industry.

The proposed TES does not address how agencies across government will work together to enact the TES and improve the tertiary education system. Implementation will require dedicated investment in coordination mechanisms, shared data systems, and aligned accountability frameworks, and a central mechanism through which to measure how the TES is performing.

Implementation should also prioritise interventions where government action can genuinely add value. The TES attempts to address issues within the current tertiary education system but it seeks to create better outcomes using the same failed

processes of previous strategies and makes no attempt to rectify the barriers that exist within the current settings and ways the system is funded in order to achieve new outcomes.

The current TES represents an opportunity to begin addressing these fundamental challenges, but realising New Zealand's economic potential requires more comprehensive and transformational approaches than those currently proposed.

SUBMISSION

To: Ministry of Education

Submission: Tertiary Education Strategy (Draft for targeted sector consultation)

Date: 30 September 2025

Sent to: tertiary.strategy@education.govt.nz

Contact: 9(2)(a)
Ia Ara Aotearoa Transporting New Zealand
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Ia Ara Aotearoa Transporting New Zealand submission to the Ministry of Education (MoE) on the initial draft Tertiary Education Strategy (TES).

Introduction

1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on MoE's draft TES and is particularly appreciative that MoE is taking a staged approach with this targeted consultation with sector stakeholders now ahead of further consultation later in 2025.

2 Given the two staged approach Transporting New Zealand has limited its feedback at this time to relatively high-level comments and we anticipate providing more detailed comments at the next round of consultation later this year.

3 As a national road freight association, Transporting New Zealand's member's businesses are a key part of an eco-system involving a workforce with a diverse range of skills. There is a heavy reliance on work-based training to ensuring that workforce has the appropriate skills and here are some examples:

3.1. Drivers: NZ Certificate in Commercial Road Transport Skills

3.2. Mechanics:

3.2.1. NZ Certificate in Automotive Engineering

3.2.2. NZ Certificate in Heavy Automotive Engineering

3.3 Logistics planners and managers: NZ Certificate in Supply Chain Management

4 Transporting New Zealand has been closely involved in leading and supporting the current reform of vocational education training, particularly with MITO recently becoming a Private Training Establishment.

The proposed changes

5 The current Statement of National Education and Learning Priorities and the Tertiary Education Strategy was developed in 2020 and is anchored around a Vision that "Our learning will be inclusive, equitable and connected so we progress and achieve advances for our people and their future journeys and encounters."

6 The above 2020 Vision partners with the following Objectives for education

6.1. Learners at the centre

6.2. Barrier free access

6.3. Quality teaching and leadership

6.4. Future of learning and work

6.5. World class inclusive public education

7 The draft TES for 2025 proposes an overarching objective of: “A tertiary education system that enables people to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.”

8 The 2025 proposal suggests the overarching objective be delivered primarily via five areas of priority for improvement:

8.1. Achievement

8.2. Economic Impact and innovation

8.3. Access and Participation

8.4. Integration and collaboration

8.5. International Education

Comments on proposed changes

9 Transporting New Zealand agrees that a change is needed that includes a stronger outcomes focus and we support the proposed overarching objective.

10 Transporting New Zealand agrees and supports the five areas of priority for improvement.

11 Transporting New Zealand believes the proposal provides a sensible and not unnecessarily overly complex pathway. The proposed pathway should provide a well-connected tertiary education system that will provide individuals with the skills to meet the labour market needs with a focus on productivity.

12 Rather than weighting or ranking the priorities, Transporting New Zealand suggests that the strategy will be most successfully delivered if all priority areas are improved. Our rationale for this is because we believe there is a degree of connectedness and dependency between the proposed priorities. For example, given the multi-billion dollar value related to international education, we envisage that will assist with investment in ways that help in other priority areas.

13 Transporting New Zealand is pleased to see “Integration and collaboration” being introduced as a new priority area and more particularly, that this has been focussed on aligning education with delivering regional and national economic development.

14 Transporting New Zealand is strongly of the view that industry needs to lead the focus areas of training and standard setting and therefore integration and collaboration with the communities that require skilled people both now and in the future is important.

15 In terms of delivering the strategy, Transporting New Zealand supports the requirement that providers seeking TEC funding are expected to show how their respective plans, activities and investment will contribute to Governments priorities. This requirement is consistent and a continuation of the expectation set during the ROVE reform currently underway.

16 Transporting New Zealand suggest that when the TES is next consulted on, it should include commentary regarding measuring and monitoring performance of the tertiary education system. Those activities will be key to understanding the success of the strategy delivery.

17 In finishing our feedback on the proposed TES, Transporting New Zealand is supportive of the proposed changes. However we are also mindful that these changes present a significant departure to a strategy that was adopted less than 5 years ago. Furthermore, these changes will be in addition to those already underway with the current ROVE reform. It is almost impossible to avoid the risk of disruption to the delivery of business-as-usual activities when implementing changes of this significance. We are hopeful that when this strategy is finalised and implemented, there will be a longer settled period where the up-skilling that is required can be undertaken and completed in an environment with greater certainty and confidence.

18 There is nothing confidential in our submission and we permit it to be published in full.

About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our focus areas for the period 2025 to 2027:

- Advocacy and policy
- Improving infrastructure to improve productivity
- Making our industry and our members businesses stronger and more resilient
- Sustainability
- Transporting New Zealand business performance

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of $6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

END

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	**Toitū te Waiora Workforce Development Council**
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • **Workforce Development Council** • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) **@toitutewaiora.nz**

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**
   No

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

We don't disagree with any of these drivers of change; however, various components and contributors to the tertiary education system would need to change significantly to respond to these drivers. We have outlined those within the comments section of the table provided.

For prudence we have highlighted significant risk to not only the vocational education system but the entire education system with the reduced funding and resourcing of the ISBs compared to the WDCs. With all kaimahi made redundant before December 31, loss of skill, knowledge and sector connection/partnership will occur. I.e. A decision has been made to transfer only two team leads from Toitū te Waiora to the Health and Community ISB with other roles (number still to be determined) advertised to open market in early 2026. The impacts or consequences across the system are:

- A gap in the provision of services to both industry partners and providers
- A complete start-up environment will mean this gap in provision of services will not be addressed until the ISB is operating as a high performing organisation which could take several years.
- The ability to respond to and deliver the pending NCEA work will be compromised and this will impact on the timeline and deliverables of that vital work and Minister Stanford must be made aware of how decisions and actions across the vocational sector will impact on her portfolio
- The quality of moderation and assurance activities will be compromised which will impact on the quality of learning students receive.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We do not disagree with these priorities however:

- Without implementing the system changes we recommend within this submission, these priorities will continue to remain just out of reach
- Whilst we note that international education will help drive economic growth, we recommend that a higher value is placed on the other 4 identified priorities.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	• We strongly agree with achievement but only if work is done to place a higher value on skills recognition over qualification completion and that funding models support that. • Employment prior to the completion of a qualification should be considered a success. Providers should plan to support the learner to complete their qualification while in employment.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Some of these activities have been occurring for decades, but lack of system change has meant these activities have not been able to have a sustainable impact: These include: • Identifying and addressing barriers • Tracking graduate outcomes • Strengthening connections with employers
Do you have suggestions for additional activities to support this priority?	• The Tertiary Education Commission (TEC) must move with urgency toward a focus on funding skills as opposed to qualifications. We know that to address workforce issues, increase access to healthcare services for communities and to recognise skills our people already possess (therefore reducing time in study) we must place a higher value on micro-credentials and skills standards than just qualifications. Currently it is challenging for providers to receive funding for micro-credentials, particularly when the system has an outdated view that employers should pay for professional development. If we are moving to a network of work-based learning provision, all training of learners in that environment can interchangeably be referred to as professional development and/or work-based learning. A differentiation is not required. • Ensure evidence-based requirements for learner success are locked into the Integrated Qualifications Assurance Framework (iQAF) self-assessment review process and discussions with NZQA.

	• NZQA must commit to and communicate definitive timelines surrounding the transition from unit standards to skills standards.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	• Strengthening industry leadership will be compromised if ISBs have reduced funding and resources to that of the WDCs. Industry leadership has increased under WDCs, and our industry partners will notice the difference in terms of collaboration. • Changing the requirement for TEC to give effect to advice provided by WDCs to have regard for advice by ISBs does not focus vocational education and training investment on where it can genuinely address skills supply issues.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	It is difficult to understand without the details about implementation how effective any of these activities can be. Again – some of these are activities that have been occurring for some time already, such as analysis, planning and advice that was already being performed by WDCs.
Do you have suggestions for additional activities to support this priority?	Suggest TEC must give effect to advice received from ISBs.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Disagree that a sustainable network of polytechnics will underpin participation in the regions. There is no evidence to suggest this will work at this point, particularly across Tai Tokerau and Tai Rawhiti where programmes have been significantly slashed. NorthTec's

	campaigning slogan for some time has been "Stay near, go far" It is important that Northlanders can study in region and in their town of residence and there is no evidence that these activities will ensure that.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Again, the contributing activities are activities that providers (some more successfully than others) have been attempting to do for decades.
Do you have suggestions for additional activities to support this priority?	• The careers advice function and platform (Tahatū) should be more aligned to ISBs. Currently TEC are accountable for this work, despite the fact they do not have the industry relationships. The accountability of this work should be with the part of the system that does have the industry relationships and that will be ISBs. • To respond to industry needs and provide relevant training to learners, providers across vocational education need to be resourced to develop programmes attached to accredited qualifications on the NZQA framework. This has been an on-going issue identified by our sectors. New qualifications need to be developed, however there is little money in the system to develop curriculum once the qualifications are on the framework. Even the Open Polytechnic, whom the Vocational Education Minister has touted as the flagship polytechnic, from whom other polytechnics can access programmes, has voiced their concern at being able to resource new development. Currently, more value is placed on a university education than on vocational education and that gap must close or better, reverse. • Currently the tertiary education system cannot articulate which contributor is responsible for the development, maintenance and oversight of degree apprenticeships. The Vocational Education Minister has mistakenly thought this the work of WDCs and has expressed surprised that this work was not done. Degrees are expressly out of scope for WDCs; however, we recommend that legislation is changed to require that all degree apprenticeships are developed and managed by ISBs upon establishment. If ISBs have accountability for delivering the NCEA skills work, they, must have a complete line of sight over the entire vocational pathway to ensure the complete study journey is both logical, sequenced, achievable and is responsive to industry demand. To allow everyone else, except ISBs, to develop degree apprenticeships will result in a lack of cohesion, industry leadership and national consistency.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Disagree that providers should develop new apprenticeships and traineeships as this will impact national consistency, industry leadership and oversight of vocational pathways.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	None of the contributing activities mention the role the ISBs will have regarding integration and collaboration. We have highlighted suggestions below.
Do you have suggestions for additional activities to support this priority?	• Regulated Authorities are often the antithesis to innovation and qualification flexibility and design. In some instances, they are placing higher value over role and profession protection than they are on protection of the public. One of the best collaborative models that gets clear on scope of practice and reduces study time, is in paramedicine where you can study to be an EMT, work as an EMT and work toward becoming a Paramedic. We are hearing repeated requests to design similar models or 'halfway' quals across Nursing, Midwifery, and Social Work. We need to have people in the workforce faster, not locked down in study for 3, 4 or 7 years. The diploma of Enrolled Nursing was developed by Ara polytechnic. This qualification and others were not transferred to the WDCs upon establishment which stymied the ability to embed the diploma within the degree as Ara refused to transfer the diploma to the standard setting body. The same mistake is being made through the establishment process of ISBs. Qualifications on the framework must be transferred to the SSB for national consistency, industry leadership and for innovation. • For national consistency, industry leadership and oversight of vocational pathways in their entirety, ISBs should be the developers of vocational degree apprenticeships. This would also avoid the situation outlined above using the example of the Diploma in Enrolled Nursing.

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	NA
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	NA
Do you have suggestions for additional activities to support this priority?	NA

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**

Provider or Agency Type	Comments on roles and expectations
Universities	
Wānanga	
Polytechnics	
Private Training Establishments (PTEs)	
Industry Skills Bodies (ISBs)	See suggestions for additional activities
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	See suggestions for additional activities
Other (please specify)	

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

The key success measure for Achievement does not place value on skills gained, albeit the narrative does. Suggest rewording the measure to be overt about value of skills.

While the intent to determine proposed performance measures relating to graduate outcomes or distance travelled is solid, it is unclear how feasible this is, given TEC doesn't currently collect demographic information on individuals completing qualifications and the task of tracking graduate outcomes has historically been onerous for providers and tertiary institutions.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

A theme throughout the draft document reads as the commercialisation of research. Research spend must be prioritised according to tangible workforce analysis, innovation and advancement of technology and health as opposed to more esoteric areas of study.

The actions to achieve the strategic intent are not tangible enough. They do not clarify who is doing what, by when or how any of that activity will be funded. A clear plan outlining the delivery of the activities will be required under this strategy.

Te Tāhuhu o te Mātauranga
Ministry of Education

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Te Kāwanatanga o Aotearoa
New Zealand Government

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To: **Tertiary Strategy, Ministry of Education,**
teriary.strategy@education.govt.nz

From: 9(2)(a)

Date: **30 September 2025**

Re: **Tertiary Education Strategy - Targeted Sector Consultation**

This note responds to consultation from the Tertiary Education Commission ('TEC') on Tertiary Education Strategy Draft for targeted sector consultation.

1. **Waipapa Taumata Rau | The University of Auckland ("the University") is New Zealand's largest, most comprehensive, and highest ranked University.** In 2024, the University enrolled over 36,000 equivalent full-time students (EFTS), of which over 29,000 were domestic funded – accounting for over 25% of the domestic New Zealand university sector.
2. The University is closely aligned with the sector strategy, though TEC feedback indicates much of the sector must improve to match our standards. However, intentional changes are required, and some may be challenging. It is not exceedingly clear with initiatives proposed if they align to Universities or Institutes of Technology and Polytechnics (ITPs).
3. While we understand the overarching narrative regarding economic growth, this ignores the wider role of universities in strengthening the fabric and cohesion of society through the intangible value of a higher education that instils critical thinking, robust examination of evidence, cultural enrichment and the ability to communicate in multiple modalities that comes with a graduate world view and perspective (particularly in the humanities).

Priority 1: Ensure students and trainees achieve qualifications that lead to good careers and economic security, with a focus on strong pathways between school, tertiary education, and work.

4. The University recognises a need for stronger alignment between tertiary provision and employer needs, especially for accredited programmes. The Strategy should preserve flexibility and exploration for learners - especially school leavers who routinely refine or change pathways as they mature and encounter new disciplines. A narrow emphasis on "good careers" and "economic security" risks undervaluing tertiary education's broader contributions to employability and citizenship (critical thinking, cultural awareness, maturity, and civic and societal impact, much aligned to the roles and expectations of the university sector, as outlined in the strategy). There needs to be a clearer distinction made between ITPs and universities when it comes to how the different sectors should respond to these priorities.
5. The language used in the Strategy in regards to outcomes is too vague. Terms like "real career opportunity," "success," "progress," and "distance travelled" require operational definitions and transparent measurement. The University recommends defining quality employment as outcomes such as (a) employment aligned to field/level (where relevant) within a set timeframe and/or (b) meaningful

employment that uses graduate capabilities—even when degrees are intentionally generalist. Earnings as a headline metric is problematic: pay levels vary by profession (e.g., teaching) and risk distorting provision away from high-value but lower-paid public-good roles. If "distance travelled" is used, publish a clear technical method (inputs, controls, safeguards) to ensure fairness and avoid gaming.

6. The Strategy is largely silent on cost-of-living, transport, housing, and mental-health pressures that materially affect participation, retention, and completion. To make Priority 1 deliverable, include explicit expectations for pastoral care capacity, disability services, and partnerships with health and social agencies, so providers can responsibly lift achievement for all learners.

Priority 2: Increase the economic impact of tertiary education by delivering relevant, adaptable skills, and research that drives productivity, innovation, commercialisation and broader economic opportunities.

6. The University supports the intention to lift economic impact through relevant skills and research, but the Strategy should explicitly treat research as a strategic, long-horizon investment, not just an immediate revenue generator. Economic benefits typically arise at the end of a long pipeline of discovery, translation, and adoption. Today that pipeline is under pressure: real-term research funding has declined, and embedding new Public Research Organisations (PROs) will take time. A sole focus on 'commercialisable' research, or research driven by the 'end-user' risks leaving the country with a large deficit in this very area in future years as the pipeline will have dried up.
7. The economic narrative should also acknowledge that highly cited, reputation-building research often emerges from disciplines not directly tied to near-term revenue. The University has a strong spin-out record (the most active spin-out companies of any public-funded research organisation across New Zealand and Australia), sustaining research excellence. This underpins international student demand and NZ's global standing while enriching research-led teaching that connects learners to real industry challenges. The University (and the wider sector) needs to continue to support these areas as decline in this indirect pipeline could negatively impact the university's capacity to increase international revenue and damage our reputation.
8. While stronger sector leadership on AI that reflects modern work practices is needed, there also needs to be concrete AI learning outcomes by level or discipline, assessment integrity safeguards, and staff capability expectations. There is a capability gap here that needs to be addressed. Resources must be used to define a national AI capability framework (for learners and staff), integrity standards (proctoring/AI-use declarations), and rapid curriculum updates in fields with a high impact on AI technologies.

Priority 3: Enable access to education and training for people from all backgrounds and regions, ensuring more people build relevant skills that contribute to a productive economy.

9. The University supports a dynamic, flexible access model that meets emerging workforce needs while fitting around the realities of working adults. For universities, this implies a clearer emphasis on the working-professionals segment (evenings/weekends, modular/hybrid delivery, recognition of prior learning) alongside clear pathways for school-leavers into employment-relevant study with room to explore and pivot as interests mature.
10. To make "access" meaningful, the Strategy should operationalise incremental, portable learning: define stackability rules, credit-transfer minima between providers, service-level targets for recognition of prior learning and credit decisions, and publish a simple, learner-facing map showing how micro-credentials stack into qualifications across institutions. Market uptake of micro-credentials has been modest; in the

University's experience employer recognition, stackability to degrees, and timetable flexibility are the decisive drivers—not just supply.

Priority 4: Deepen collaboration between education providers, employers, iwi, research institutions, and communities to align education with regional and national economic development.

11. The University already actively supports deeper collaboration across providers, employers, iwi, research institutions, and communities. The Auckland region accounts for 40% of New Zealand's gross domestic product – investment in the region as an economic powerhouse is the only sensible option, particularly in terms of driving innovation and commercialisation.
12. To increase economic impact focus needs to be placed on New Zealand's core export industries, collaboration on the top challenges per sector, and using this work to drive curriculum design and research. This will lead to direct economic outcomes.
13. It is concerning that global challenges (such as the climate crisis, AI adoption, biosecurity etc) appear only in this section. These should be embedded across the Strategy priorities so that education efforts and associated metrics are aligned to the same set of challenges.

Priority 5: Boost numbers of international students, supporting the sector to grow and increasing New Zealand's international connectivity, as set out in the International Education Going for Growth Plan.

14. The University actively supports any ambition to grow New Zealand's international education market, and note the alignment with our institutional goal to reach 21% international enrolment by 2035. To ensure sustainable and resilient growth, the TES should set out clear diversification, capacity, quality, and risk areas.
    a. Diversification: Avoid over-reliance on any one country or subsector of the education sector by setting guidance on country mix, subsector balance (unis, polytechnics, schools etc) and delivery modes (onshore/offshore/online).
    b. Capacity and student experience: Growth in numbers of international students must be matched with housing, transport, health and mental-health services, and pastoral care. There should be a requirement for annual provider or city capacity statements to ensure a positive student experience can keep pace with recruitment.
    c. Quality and integrity: Expansion of offshore and online delivery raises integrity risks, especially with advanced AI tools that may grow more advanced in the coming years. A transnational QA standard, AI assessment policies at the provider level, and transparent reporting on integrity incidents are steps to protect the NZ higher education industry's reputation.
    d. Immigration and workforce alignment: A generous post-study work visa system with a 3 to 5 year duration which becomes active immediately after graduation with minimal administrative burden for students would make the New Zealand higher education sector a more attractive proposition. PSW duration could scale with verified skills shortages (including regional uplifts), with protected, attractive pathways for public-good professions (teaching, nursing, social work).
    e. Resilience Planning: Keep a shared, regularly updated risk list (e.g., geopolitics, pandemics, sudden policy changes). Run simple "what-if" drills (for example, "what if enrolments from a major country fell by 50%?") so everyone knows the playbook. Set aside a small, ring-fenced reserve from international-student revenue to cushion shocks. And spread delivery across on-campus, online, and offshore options so teaching can continue if travel or visas are disrupted.
    f. Community integration & reciprocity. Encourage programmes that connect international students with local communities, iwi, employers, and volunteering so students see greater social

integration with the wider community, and experience life in New Zealand beyond their immediate campus and city centres.

Areas not covered in the Strategy

15. Reference to sound learner foundation skills has been removed – preparation for university is the strongest determinant of success at university. Many students are enrolling without the requisite literacy and numeracy skills to succeed. It is disappointing that this is not explicitly outlined in the Strategy.
16. Student preparedness requires an end-to-end lifetime strategy for education. The onus is seen to be on tertiary education but there is a persistent challenge in the readiness of the secondary education pipeline for tertiary education. Secondary education will surely need to become more nimble and adaptive to changing needs and drivers as the pace of change through AI alone will likely advance materially through lifecycles during a secondary student term (5-7 years).
17. If the sector wants to increase success for Māori learners, it needs to be a sector that is relevant and welcoming to them. Removing these components from the TES is hardly surprising but is disappointing and fits with the move away from inputs to outputs. The University of Auckland will continue to put te reo Māori and tikanga Māori in our everyday teaching and learning (as outlined in People and Culture Priority 4 from Taumata Teitei - Activate manaakitanga, whanaungatanga, and kaitiakitanga across our People and Culture practices).

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	University of Canterbury
Organisation category (please indicate):	~~Educator group~~ ~~Industry~~ ~~Polytechnic (including divisions of Te Pūkenga)~~ ~~Private Training Establishment~~ ~~Student association~~ **University** ~~Wānanga~~ ~~Workforce Development Council~~ ~~Other (please specify)~~
Role/position	9(2)(a)
Request to withhold part or all of submission	*This can be published in full.*
Email address *For contact in response to Official Information Act request only.*	9(2)(a) @canterbury.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

Overall we support the draft objective for tertiary education, with two considerations.

The draft objective includes the term “people”. To better signal the ambition to further grow access and participation, this could be changed to “all New Zealanders”.

The notion of nurturing a high-performing, innovative, efficient and enduring tertiary education system could be incorporated through the addition of one or more adjectives.

A possible revision is:

> A **sustainable and future-focused** tertiary education system that enables ~~people~~ all New Zealanders to succeed with knowledge and skills that advance an innovative, high-productivity economy, and improve quality of life.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Overall we agree with the drivers of change, and how they flow into the five priorities for improvement.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

The priorities are currently structured as outcome-focussed, externally-facing emphases for the system, which are valid and appropriate. A sixth priority could relate to lifting system performance and sustainability, with an expectation this also applies to individual providers. Although collaboration is covered as a separate priority, elements such as longer-term financial sustainability, lifting governance and management capability, and nationwide academic and education professional workforce development could sit under this priority. These elements are key to driving the other priorities and setting the system up for longer-term success, particularly as emphases and funding arrangements change through political and economic cycles.

This is particularly important as the strategy is expecting performance improvements across many dimensions, including growing participation, lifting student achievement, changes to improve industry linkages and other collaborations, changes to best drive economic impact and improving research impact, all whilst requiring providers to continue to pursue their broader statutory missions. Lifting system and provider capability to deliver on these competing goals will be a key determinant of their success over a longer timeframe.

A suggested name for a sixth priority would be *System Performance*, with possible contributing activities being growing New Zealand as a destination for academic and researcher talent, lifting governance and management capability across the system, and enhancing and simplifying the policy, oversight and commissioning functions of governmental bodies.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • ~~**Agree**~~ • ~~**Neutral**~~ • ~~**Disagree**~~ • ~~**Strongly disagree**~~
Comments	Student achievement should remain a central priority. This benefits both the individual learner, in terms of having a positive experience and achieving good graduate outcomes and value-for-money, as well as ensuring quality at a provider and system level. The way that 'achievement' is defined and measured is a more debatable point, with a need to broaden from a focus on course and qualification completion rates to better account for the increasingly flexible nature of education and the increasingly diverse aims of students engaging with tertiary education throughout their lives.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• ~~Strongly agree~~ • **Agree** • ~~Neutral~~ • ~~Disagree~~ • ~~Strongly disagree~~
Comments	This draft contributing activities are either framed as targets ("reduce disparities", "improve retention rates") or a continuation of existing practice (evidence-based approaches to learner success, continuation of Disability Action Plans). Other than setting an objective for providers and agencies, the former will not directly lead to improvements, and whilst the latter will see some further improvements, these will become more incremental over time as these activities have now been operating for several years. "Distance-travelled' and employment outcome measures are, in abstract, valid concepts. However, in practice these can be difficult to implement, and can add limited value, particularly when applied at a granular (provider) level. Where the contributing activities relate to mixes of provision, these also need to be reflected in funding rate settings and subject priorities. For example, if providers are to grow Kaupapa Māori provision and provision in te reo Māori, or in foundation education programmes, funding priorities and decisions need to support such growth.
Do you have suggestions for additional activities to support this priority?	Review the incentives (and disincentives) for improving learner achievement implicit in the core funding mechanisms, plus within appropriation- and provider-level funding decisions. Continue to evolve how learner achievement is measured, including a better allowance for modern modes of learning, such as micro-credentials, part-time learning, and learning at multiple providers.

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	~~Strongly agree~~ **Agree** ~~Neutral~~ ~~Disagree~~ ~~Strongly disagree~~
Comments	Along with other priorities, lifting economic impact and innovation is a valid objective of the system. This delivers wider societal benefits and lifts the relevance and impact of the system over time.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	~~Strongly agree~~ **Agree (Research elements)** ~~Neutral~~ **Disagree (Teaching elements)** ~~Strongly disagree~~
Comments	The example contributing activities are largely focused on research, graduate study, and vocational education, which whist valid, do not cover a key impact of Universities, being producing graduates (or delivering learning without the award of a formal qualification) who go on to generate greater economic impact through adding more value in employment and other settings.
Do you have suggestions for additional activities to support this priority?	Following from the above comment, two key contributing activities should be: • Improving how employability, work-readiness and other transferable skills are incorporated into higher education provision, reflecting job-agnostic preparation to add more value to an employer. • Strengthening the alignment between provider (and system) mixes of provision, employer needs, government priorities, and student interest. This includes discipline-specific skills, transferable skills, and appropriate modes of delivery. Several of the contributing activities under other priorities would also support this priority, particularly: • Increase the availability of high-quality online and blended learning options. • Ensure policy and operational settings support increased access to micro-credentials and other right-sized, cumulative options. • Provide quality information to students on career pathways and employment outcomes, and whether career- and occupation-specific qualifications lead to relevant employment.

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• **Strongly agree** • ~~Agree~~ • ~~Neutral~~ • ~~Disagree~~ • ~~Strongly disagree~~
Comments	Having a population that is increasingly qualified and skilled to higher levels is critical to lifting individual and community wellbeing, as well as wider regional and national productivity. This is particularly relevant in the context of reducing disparities between different population groups, and removing barriers to accessing and participating in tertiary education.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• ~~Strongly agree~~ • **Agree** • ~~Neutral~~ • ~~Disagree~~ • ~~Strongly disagree~~
Comments	The example contributing activities are all valid and will support smooth transitions into tertiary education by people from varied backgrounds and at different life-stages. However, two greater drivers of access and participation in the tertiary education system are the number and mix of places that government subsidises (DQ funding), and the settings for fees, loans and allowances. Sufficient government investment and appropriate policy settings in these areas are critical to achieving this part of the strategy. Provision aimed at underserved groups is often more costly to deliver as students may need higher levels of academic and pastoral support, and many of these students reside outside central city locations, with regional, face-to-face delivery requiring a higher investment. In a similar vein, it is noted that whilst wholly-online, or even hybrid, provision is a valid option for learners with reasonably strong (and recent) educational and technological backgrounds, it is not appropriate for all learners, and strategy, policy and funding decisions need to recognise this.
Do you have suggestions for additional activities to support this priority?	Review funding mechanisms and allocations to better incorporate cost of delivery particularly in provision aimed at underserved groups or those with a weaker educational background. This could include a review of the current Equity Fund.

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	~~Strongly agree~~ • **Agree** ~~Neutral~~ ~~Disagree~~ ~~Strongly disagree~~
Comments	Integration and collaboration are appropriate objectives for the system, noting this is already occurring to a large extent.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	~~Strongly agree~~ ~~Agree~~ • **Neutral** ~~Disagree~~ ~~Strongly disagree~~
Comments	The example contributing activities are currently phrased in aspirational terms with limited indication as to what activities would be undertaken to deliver tangible changes. It is noted that collaboration, both within the education and science sectors, as well as with wider industry and community groups, is already high, but without changes to funding incentives or policy (many of which disincentivise collaboration), it is unlikely to significantly grow further.
Do you have suggestions for additional activities to support this priority?	Review funding incentives and policy to best facilitate collaboration amongst education institutions and with research organisations. This includes removing policy barriers and financially incentivising joint delivery of academic programmes and other teaching and learning pathways. It is noted that continuation of the Centres of Research Excellence (COREs) programme is covered in other policy channels, but that model is a tangible and practical example of collaboration across multiple agencies, and could be used as a base for future collaborations. Similarly, although small in scale, the ICT Graduate Schools saw similar multi-institution partnerships in a teaching setting. In both of these cases there was separate, additional funding to incentivise such change.

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	~~Strongly agree~~ • **Agree** ~~Neutral~~ ~~Disagree~~ ~~Strongly disagree~~
Comments	Current financial pressures are high, and growing revenue from offshore, particularly international student fees, is critical to the short- and medium-term financial sustainability of the system and individual providers.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	It is generally consistent. However, programme development targeting international students is only partly aligned to government priorities. For example, demand from international students for University-level business programmes is high, however this is not a domestic funding priority, creating some tension. It is also noted that increasing the number of international students lifts the demands on academic and pastoral support services. Whilst higher revenues will support funding greater levels of support, there is a tension to be managed as providers are also pursuing the priority to lift the achievement of domestic students, particularly those requiring higher levels of such support. In terms of the longer-term viability and sustainability of the sector, increasing the proportion of international full-fee students in the system introduces a greater level of risk. Earthquakes and pandemics have caused major challenges to providers' financial situations in recent years, and future shocks and global political and economic changes will cause dips in international student numbers, often at short notice. This generally results in rapid cost-cutting at providers, which jeopardises all other priorities in the TES.
Do you have suggestions for additional activities to support this priority?	Following from the previous section, at a government level there should be a strong emphasis on both growing and diversifying international education, and de-risking the impact of future shocks. This includes expanding the spread of regions and countries of origin, the types and subjects of qualifications being offered, and ensuring immigration and visa settings encourage students to remain in New Zealand for a longer timeframe. Government agencies can support this through facilitating relationship development and increasingly resourcing brand awareness campaigns in different markets, particularly in nations and regions that fit within broader government diplomatic and trade priorities.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	Agreed.
Wānanga	-
Polytechnics	-
Private Training Establishments (PTEs)	-
Industry Skills Bodies (ISBs)	-
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	-
Other (please specify)	Including this clarity of roles and expectations by organisational type is commended. Although not 'tertiary education', a comment on the role of the primary/secondary sector could add additional context, particularly their role as the feeder of 'tertiary-education-ready' students into the tertiary system. Under the "Providers are expected to…" section there is nothing explicitly related to access and participation. This could be added to the first bullet point, possibly as: • Align their educational delivery and research activities with the TES priorities, including by **lifting access and participation**, responding to workforce needs, improving outcomes for under-served students and trainees, and contributing to national and regional development.

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

Overall the type of measures included in the draft strategy are valid and appropriate.

The main feedback on this section relates to the need to differentiate between those measures suitable for provider-level analysis and to inform funding decisions over a 1-3 year time horizon, and those for longer term system-level analysis. Examples of the latter are the six-year cohort based qualification completion rates, and long-term salary and employment outcome tracking of graduates, which are difficult to relate to provider-level interventions made on a much shorter planning cycle.

A second key consideration is that all data collection, analysis and reporting creates bureaucracy and can lead to requirements for expensive technical development. This needs to be balanced with the value and tangible use of such measures.

It is acknowledged that development of the indicators is being undertaken in partnership with providers and other agencies, and it is requested that this collaboration continues.

It is noted that the international education targets have come from the separate international growth strategy, but this is the only section in the draft TES with numerical targets. Setting quantitative targets in other areas with mature measures, such as participation and achievement, would clearly signal the level of ambition within the strategy, and allow ready disaggregation of the measures and targets by individual providers.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

The more detailed nature of this strategy, and the clearer relevance to universities, is supported.

The successful execution of this strategy is largely dependent on increased government funding into the system. Whilst the international education priority will lift revenue, the expectations of this strategy to concurrently increase participation, achievement and collaboration, and grow provision and research in higher-cost areas such as engineering and science, will be difficult to achieve in a constrained funding environment. Such limited funding will lead to difficult trade-offs by providers, with the most financially-beneficial path likely to be chosen, rather than the one that will make the greatest contribution to the TES objectives. Financial pressures also tend to encourage greater competition, counter to a key objective in the strategy. Increases to aggregate teaching and research funding, and considered changes to operational policy settings and associated incentives, will be needed to avoid these negative outcomes.

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Te Kāwanatanga o Aotearoa
New Zealand Government

Submission on Draft Tertiary Education Strategy (TES) 2025

Submitted on behalf of UNZ's Komiti Pasifika

Introduction

Talofa lava, Mālō e lelei, Ni sa bula vinaka, Aloha, Fakaalofa lahi atu, Tēnā koutou, and warmest Pacific greetings; we, the most senior Pacific academic leaders from across Aotearoa New Zealand's universities, welcome the opportunity to provide collective feedback on the Draft Tertiary Education Strategy (TES) 2025. Our response reflects the experiences, expertise, and aspirations of Pacific peoples in higher education, and is grounded in our commitment to ensuring the tertiary system works for all learners, particularly those historically underserved.

Please note, that this submission accompanies our consultation session had with the Ministry of Education, 23 September, 2025.

Purpose of Feedback

Our aim is to ensure the TES meaningfully incorporates Pacific worldviews, knowledge systems, and priorities. We see this as our opportunity to advocate for what is missing in the TES, raise concerns and risks, and identify opportunities for Pacific advancement.

Strategic Direction

We support the Government's intent to strengthen tertiary education for economic growth, but caution that productivity and commercialisation must not overshadow broader goals of cultural identity, wellbeing, and intergenerational prosperity. For Pacific peoples, education is about service to community, cultural continuity, and collective advancement.

- We note that the TES is strongly aligned to the Government's Going for Growth agenda. While economic contribution is important, the absence of an explicit equity lens risks marginalising Pacific priorities.

Concerns and Risks for Pacific Learners and Communities

a. Strengthening Pacific priorities

Explicitly including Pacific priorities, with clear targets and accountability, would affirm their visibility and ensure providers address these disparities. This could be achieved by embedding Pacific success within *Access and Participation* and as a cross-cutting principle across all TES priorities.

- Without specific Pacific priorities, there is potential harm for Pacific students, who already experience higher attrition and limited postgraduate pathways, and may continue to be underserved.

b. Economic growth focus over social and cultural equity

The TES is firmly positioned within the Government's Going for Growth agenda, prioritising productivity, innovation, and commercialisation. While economic contribution is important, this framing risks marginalising Pacific Indigenous epistemologies/ontologies that define success in terms of cultural continuity, collective wellbeing, and relational responsibilities.

- Narrow labour-market definitions of success may undervalue Pacific contributions to 'aiga/fanau, communities, and cultural life.

c. Research funding reform risks

Proposals to replace the Performance-Based Research Fund (PBRF) with the Tertiary Research Excellence Fund (TREF) or the UAG's Research Intensity Component (RICU) rely heavily on bibliometrics such as field weighted citation counts and research revenue. These mechanisms historically disadvantage Pacific scholars and undervalue community-embedded, culturally grounded/affirming research.

- There is potential harm that Pacific research may be further ostracised, weakening postgraduate pipelines and diminishing the visibility of Pacific knowledge systems.

d. Governance and representation gaps

The proposed University Strategy Group (USG) and UAG's New Zealand Universities Council (NZUC) do not guarantee Pacific representation. While one Māori member is recommended, Pacific voices are absent from these high-level decision-making bodies. Without mandated Pacific membership, policy and funding decisions risk being made without Pacific perspectives, reinforcing systemic inequities and limited Pacific success.

e. Equity risks in admissions and pastoral care

The UAG proposes raising entry standards and replacing the Pastoral Care Code with self-audit mechanisms. Without funded pathways, higher entry standards will disproportionately impact Pacific learners who already experience educational inequities. Similarly, self-audit pastoral care may weaken protections for Pacific students who rely on robust support systems.

- Barriers to entry and inconsistent pastoral support may reduce Pacific access and success.

Opportunities for Pacific Engagement and Contribution

Despite the risks, the TES and related reforms also present important openings for Pacific advancement:

1. Integration and collaboration priority – opportunities exist to embed Pacific communities as partners in regional development, aligning with TES calls for collaboration with iwi, employers, and communities.

2. Demographic momentum – Pacific peoples are a growing share of the tertiary pipeline, projected to reach 40% of the entry cohort by 2040. This demographic reality makes Pacific success central to the sustainability of the sector.

3. Centres of Research Excellence (CoREs) – refinements to CoRE policy provide an avenue to establish Pacific-led CoREs and require authentic Pacific engagement across existing centres.
4. AI and system change – early focus on AI and student mobility offers an opportunity to embed Pacific co-design, ensuring innovations are inclusive and equity-minded, while advancing Pacific regional data sovereignty and governance.

Priority 1: Achievement

Success must be measured not only by completion rates and labour market outcomes but also by Pacific values of collective achievement, cultural identity, and service to community.

Closing achievement gaps requires addressing systemic racism, deficit narratives, and under-representation of Pacific staff.

Recommendation: Develop indicators of Pacific learner belonging, cultural affirmation, and institutional accountability for equity.

Related risk: Higher entry standards and weakened pastoral care protections may reduce Pacific participation and retention.

Priority 2: Economic Impact and Innovation

The emphasis on commercialisation and productivity undervalues Pacific innovation, which often addresses health, social resilience, cultural revitalisation, and sustainability.

Recommendation: Broaden definitions of innovation to include Pacific knowledge systems, indigenous entrepreneurship, and social innovation. Ensure Pacific representation on Industry Skills Boards.

Related risk: Reliance on bibliometrics in new research funding models risks marginalising Pacific scholarship.

Priority 3: Access and Participation

Access for Pacific learners requires culturally sustaining pedagogy, Pacific staff presence, and institutional accountability for equity.

Recommendation: Mandate Pacific student support strategies (mentoring, advising, dedicated Pacific spaces) and strengthen secondary–tertiary pipelines for Pacific learners.

Related risk: Rising costs, higher admission standards, and inequities in school preparation may exacerbate barriers.

Priority 4: Integration and Collaboration

Pacific communities are absent from the TES framing despite their growing demographic and workforce contributions.

Recommendation: Require partnerships with Pacific communities and organisations in regional planning and recognise Pacific-led research contributions.

Opportunity: Embed Pacific communities as partners in regional skills planning and knowledge collaborations.

Priority 5: International Education

International education is framed narrowly as an export industry. For Pacific peoples, it is about reciprocity and collective uplift for Te Moana-nui-a-Kiwa.

Recommendation: Position the Pacific as a distinct international focus, aligning TES with Pacific regional priorities such as climate resilience and mobility agreements.

Delivering and Monitoring the Strategy

The roles of universities, wānanga, and polytechnics are described, but Pacific higher education aspirations—such as Pacific-led CoREs and knowledge hubs—are invisible. Monitoring must include explicit equity targets and Pacific-specific indicators, not just generic categories. These should measure belonging, cultural safety, Pacific staff representation, and the contribution of tertiary education to Pacific communities.

General Observations

- TES strategy wording has a strong focus on economic growth and research commercialisation, with equity almost invisible (mentioned once in 24 pages).
- Pacific is mentioned 10 times in the draft, but without explicit prioritisation.
- Outcomes and completions for Pacific students remain critical, alongside affordability and accessibility.
- Transitions into tertiary study are a key inflection point for Pacific learners, requiring robust support systems.
- Experiences prior to tertiary education strongly shape Pacific success, including inequities in schooling.
- Support mechanisms for Pacific students must be accessible, timely, and culturally appropriate and relevant.
- Funding inequities persist for Pacific learners and support services.

Overall Recommendations

The TES will be strengthened by embedding a Pacific lens across all priorities, not only in equity discussions. This requires:

1. Recognising Pacific knowledge systems, languages, and worldviews as critical assets.
2. Building Pacific leadership capacity across all tertiary institutions.
3. Embedding Pacific partnerships in governance, research, and regional development.
4. Monitoring outcomes through measures of equity, wellbeing, and community impact, alongside economic metrics.

Closing

As Pacific leaders within Aotearoa New Zealand's universities, we affirm our commitment to working with Government and agencies to co-design a tertiary system that genuinely reflects Aotearoa New Zealand's diversity and honours its place within the Pacific.

Fa'afetai tele lava, Mālō 'aupito, Vinaka vakalevu, Mahalo nui, Thank you very much.

Komiti Pasifika Members:

Professor Jemaima Tiatia-Siau (Chair, Pro Vice-Chancellor Pacific, Waipapa Taumata Rau, University of Auckland)

Associate Professor Keaka Hemi (Deputy Chair, Assistant Vice-Chancellor Pacific, Te Whare Wānanga o Waikato, University of Waikato)

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Fa'alogo Associate Professor Jacoba Matapo (Pro Vice-Chancellor Pacific, Te Wānanga Aronui o Tāmaki Makau Rau, Auckland University of Technology)

Distinguished Professor Steven Ratuva (Pro-Vice Chancellor Pacific, Te Whare Wānanga o Waitaha, University of Canterbury)

Professor Palatasa Havea (Dean Pacific Student Success, Te Kunenga ki Pūrehuroa, Massey University)

Apulu Melvin Apulu (Director Pacific Student Success, Te Kunenga ki Pūrehuroa, Massey University)

Dr Emma Dunlop-Bennett (Assistant Vice-Chancellor Pasifika, Te Herenga Waka, Victoria University of Wellington)

Universities New Zealand submission on the draft Tertiary Education Strategy

29 September 2025

Introduction

This submission is from Universities New Zealand, the operating name of the New Zealand Vice-Chancellors' Committee, a statutory body established under Section 311 of the Education and Training Act 2020 (the Act). Universities New Zealand brings the eight universities together to collectively support and advance the objectives of the Act – including quality assurance and collective review and approval of qualifications.

For further information, please contact 9(2)(a), Universities New Zealand—Te Pōkai Tara 9(2)(a)@universitiesnz.ac.nz).

Submission

Broadly we support the direction of the Tertiary Education Strategy (TES).

We share the ambition for a tertiary education system that sits at the heart of our national prosperity and wellbeing.

We are committed to student success, generating and sharing knowledge, lifting productivity, and contributing to growth.

However, we recommend that the focus on economic growth and commercialisation is balanced with the broader social and cultural contributions expected of universities. Generally, the universities themselves see their long-term focus as being to:

- Generate ideas and skilled graduates that underpin productivity and prosperity.
- Foster equitable social mobility.
- generate cross-border collaborations and people-to-people links to generate knowledge and innovation that contributes to wellbeing
- Support diplomacy, social cohesion and the values that underpin participatory democracy.
- Test ideas and find solutions that help countries navigate complex issues and problems.
- Transfer ideas, knowledge and expertise to lift wellbeing and performance economically, socially, and culturally.

For universities to best serve this country, they need resourcing to recruit and retain excellent teachers and researchers. They need the international reputation and connections to attract staff and students and to access knowledge and research collaborations. They aim to provide students with a supportive, welcoming, and engaging learning environment.

To deliver all of this, universities need clear long-term priorities and investment signals so they can commit to long-term investment in necessary capability and infrastructure.

As currently drafted, the TES sees New Zealand's university system serving this country well if it is doing the following:

- **Achievement** –
    - more students gaining qualifications – with universities doing more to support students to success.
- **Economic Impact and Innovation** –
    - Qualifications with more of the skills and capabilities sought by employers.
    - Improving work readiness.
    - Graduates who are adaptable, creative, critical thinking, with strong skills in communication, teamwork, and problem solving.
    - More research done with and for industry.
    - Faster transfer and take up of university generated research and knowledge by industry.
    - Prioritising commercialisation of research.
- **Access and Participation** –
    - Improve access and participation rates, particularly for traditionally underrepresented groups like young Māori and Pacific peoples.
    - Support people to upskill and retrain throughout their lives.
    - Increase the range of education and training options to support upskilling and retraining.
    - Support the movement of students between providers.
- **Integration and Collaboration** –
    - Universities to work with schools to provide clear pathways and to support students into them.
    - Universities to engage more with employers on the design and delivery of learning – including through work-integrated learning and industry-led project work.
    - Universities to work more closely with Public Research Organisations.
- **International Education** – Ensure high quality education and qualifications for international students.

Broadly, we agree with these priorities and areas of focus, but the TES is overly focussed on trying to produce graduates with qualifications that put them on pathways to specific careers.

We now live in a world where most university graduates will have multiple careers – working across a mix of industries and roles. Qualifications will best serve these

graduates when they develop capabilities that will support them across all careers and through industries that are going to radically evolve in the face of new technologies.

These capabilities include self-organisation, adaptability, critical thinking and reasoning, working well with others, communication skills, and competence with technology – including artificial intelligence.

We recommend the TES acknowledge the current financial pressures on the system and that significant additional funding is unlikely for some time to come.

We suggest that the TES would be stronger with a revised set of middle-term priorities that better balances what will add value to the country with what can realistically be implemented within current resourcing.

Priority 1: Achievement

We welcome and support the more nuanced focus on tracking the value added by providers by focussing on the distance travelled by their particular learners and those learners' prior educational achievement, socio-economic circumstances, etc.

We also support the aspiration of work-integrated learning supporting transitions into employment.

In terms of the contributing activities, we suggest that this list be reframed as follows for universities – noting that many of the existing 'activities' in the draft TES are actually 'goals':

1. The Tertiary Education Commission should enable providers to work up performance measures that better support reporting on the journey travelled by students – connecting their prior educational achievement with retention and achievement rates at first year through to qualification outcomes, through to employment outcomes.

   The frameworks could support identification of how under-served groups are being supported into and through higher education also on a like for like basis.

   The frameworks could look at how students are being supported through to postgraduate qualification that develop research skills.

   The frameworks should also reflect that the learning journey of many students is not linear. Some start multi-year qualifications at one institution and finish at another – sometimes after gaps of many years. Some change their minds as to what they want to study. Some have their studies interrupted because of factors outside their control – such as health issues, family issues, and financial pressures. Tertiary education providers can help mitigate and even manage these to some extent, but cannot and should not try to control them.

2. Provider Investment Planning should include the approaches that are being taken to address issues and opportunities in supporting their learner cohorts and addressing risks and barriers to retention, achievement, completion, and employment.

3. Strengthen provisions that meet the needs and aspirations of Māori, including kaupapa Māori provision and provision in te reo Māori, where relevant.

4. Strengthen foundation education programmes centred on enabling ongoing employment/workforce attachment and work experience for youth at risk of long-term poor employment outcomes.

Priority 2: Economic Impact and Innovation

We are pleased to see the references to research in this Tertiary Education Strategy.

We do think that more could be done to acknowledge the legitimacy and value of alternative knowledge systems, notably mātauranga Māori, within New Zealand's research landscape.

We also think that the prioritisation of commercialisation within the strategy is disproportionate. Much of the research conducted for public benefit is not inherently commercialisable, nor should it be narrowly evaluated through an economic lens. Much of it is done as part of teaching people how to research and producing a productive and innovative workforce.

Although this section is heavily focussed on vocational learning, we think that a different set of contributing activities would also be helpful here. We suggest the following areas of middle-term focus to help universities do more in the economic impact and innovation space:

1. Research skills better aligned to industry needs – grow the proportion of postgraduate research carried out collaboratively with and for end-users to (a) address real world research needs, while (b) giving graduates the connections and real world knowledge that will allow them to continue working with and for end users whether they work inside or outside universities after graduation.
2. Deepen collaborations across the publicly funded research system (including universities and Public Research Organisations). This should result in greater collaboration around development of the early career workforce, shared use of capital-intensive infrastructure, and improved knowledge transfer to Government and business.
3. Promote settings that will improve knowledge transfer to benefit the economy and society. For universities, these should include:
    a. A requirement that Government-funded research be publicly available (other than where disallowed by commercialisation policies)
    b. Research commercialisation policies that make it more likely commercialisable ideas get to market – including intellectual property policies with appropriate incentives for university staff and students and funding to support commercialisation.
4. All degree and postgraduate level qualifications to include meaningful capability development and assessment in the following areas:
    a. Effective and ethical use of Artificial Intelligence. National procurement and licensing arrangements are necessary to give all staff and students access to the necessary generative AI tools.

b. Qualification-relevant work experience. Mainstream work-integrated opportunities into all qualifications that are not currently funded for work practicums.

5. Develop guidelines and examples of good practice to assist tertiary education providers in identifying opportunities to develop innovation and entrepreneurship skills across a greater range of qualifications.

Priority 3: Access and Participation

This is another area where we suggest some alternative contributing activities for both universities and other sub-sectors. Specifically:

1. Pursue development of a New Zealand Government mandated platform for use by all publicly funded providers for credit transfer and upholding the integrity of the qualification system. *[Note that universities already have a solution through the My eQuals platform]*
    a. All publicly funded providers will use the shared platform to make graduate transcripts and certificates available for students to share with employers.
    b. All publicly funded providers will share high level common principles and standards for when and where credits will be awarded because of relevant credits successfully completed elsewhere through another provider.
    c. All publicly funded providers will use the shared platform for recognising and awarding credits for prior learning.
2. Schools and tertiary providers collaborating on supporting students through the planning and transition from school to tertiary studies. School funding that allows for tertiary providers to support schools in the delivery of specialist senior school curriculum where schools lack either infrastructure to deliver the curriculum, or adequately skilled teachers.
3. Review Equity Funding so it is better sized and designed to support under-represented groups into and through tertiary studies. Link it more closely to prior educational achievement and particular learning needs so there is additional support for students most likely to need it. Ensure it can support under-represented groups into postgraduate research qualifications where necessary.

Priority 4: Integrity and Collaboration

Although there is no issue with the intentions of this priority, everything in this priority could be woven into one of the first three priority areas.

Priority 5: International Education

International education is both a priority and an opportunity for New Zealand's universities. It contributes to our international connections allowing us access to international networks and research collaborations. International students bring a

cultural richness and diversity to our campuses and create the long-term connections that this country needs around the world in research, trade, tourism, and diplomacy.

The earnings from international education subsidise the cost of our university system to taxpayers and are a reason why all our universities are ranked in the QS top 500 despite funding per student that is below the OECD average and well below the university systems in Australia, the UK, Canada, and the US. The rankings are key to our being able to attract and retain world class academic teachers and researchers and, in turn, to attracting and recruiting larger numbers of international students.

As such, we support the goal of doubling international education earnings over the next ten years.

But, this section of the TES makes no sense as currently framed.

The contributing activities are all focussed on marketing and branding. There is no mention at all of the providers who actually recruit and teach international students and deliver the value and experience that makes them recommend this country as the best choice to other international students.

We recommend that the contributing activities in this Priority be completely rewritten.

International education strategies just for Government have been tried and failed in the past. They do not work. For real long term sustainable growth in international education strategies need to be jointly designed and implemented by both providers and Government.

We recommend the 'contributing activities' be more along the following lines:

1. All plans and strategies cover both Government and the international education industry. They have priorities, intervention logic, and interventions that are jointly developed, agreed, and implemented by providers and Government. Plans and strategies ensure that:
    a. Marketing and promotion activities are targeted to where the international education industry is either focussed now or wanting to diversify in future.
    b. Government's role in opening up new markets and/or products is around business case development and fixed term investment to test options, to pilot initiatives, and to support providers and sub-sectors getting to the scale where the market or product is self-sustaining. There is resourcing for this.
    c. Immigration policy and operational priorities are informed by the middle-term priorities for market development and diversification. INZ are an enabler for high value sustainable international education growth.
2. There is cross-party understanding of the value in having one Minister responsible for both immigration and international education for as long as growing export earnings from the international education remains a priority.
3. Amend the International Education Senior Officials Group so it hears from or involves providers in all planning and monitoring work.

4. Implement an improved agent network model that standardises training and engagement with recruitment agents. Identify and manage out agents who act unethically or dishonestly.

THE UNIVERSITY OF
WAIKATO
Te Whare Wānanga o Waikato

Draft Tertiary Education Strategy Feedback

The following submission is provided on behalf of the University of Waikato and has been developed in conjunction with members of the University staff and senior management.

The University of Waikato is generally supportive of the direction set out in the draft Tertiary Education Strategy (TES) but would like to make the following points:

While the draft seeks to set out specific roles for various parts of the sub-sector, these are not as clear cut as set out, and different parts of the sub-sector contribute to the same goals. For example, the statement on page 5 that 'Wānanga contribute to this by providing education and research grounded in te reo Māori, mātauranga Māori and tikanga Māori' ignores that many universities (and ITPs) also have dimensions of their delivery that are underpinned by these same attributes; the University of Waikato's Faculty of Māori and Indigenous Studies, and programmes offered in partnership with it would equally provide education and research grounded in te reo Māori, mātauranga Māori and tikanga Māori'.

Similarly, it is unclear from the draft TES whether the expectation is that those programmes deemed vocational (currently under a very arbitrary definition enforced by the Tertiary Education Commission) that are offered by universities are required to be developed in consultation with Industry Skills Boards.

The University would also encourage the TES to be cognisant of the view that there will need to be a transition to new expectations for the sector, as such it might be appropriate to express some of the TES ambitions as a two stage process. For example, the establishment of new and agreed measures for reflecting the impact of research will take some time, the TES could potentially reflect the need for a current state of development of shared indicators and a future state of reporting on research impact.

Priority 1: Achievement

While the University of Waikato is supportive of the development of a 'distance travelled' outcome measure, this needs to be an agreed measure that is equally applicable across all parts of the sector and takes into account the different backgrounds of students. This measure would need to reflect that a significant proportion of tertiary students are not school leavers and the fact that postcodes, a common proxy for socio-economic level in other countries, are insufficiently specific in NZ to provide a meaningful gauge.

Priority 2: Economic Impact and Innovation

As well as focusing on building economic impact there is a need to account for economic protection and preconditioning – for example a great deal of our economic prosperity and future prosperity is heavily reliant on environmental conditions – and these should reflect either the assumption that they will remain fixed for farming, tourism and sustainability of our cities, or that they will be subject to change through future environmental energy sources. However, we know the environment to be defined by a complex set of interacting processes that are all subject to change. Understanding those processes, their complex and non-linear interactions and exponential change is a fundamental precursor to environmental dependencies of our economic development.

In the same sense it is valuable to think of economic relevance not only in terms of economic development but also the reduction of the economic burden of a range of public good activities (such as Health) and economic shock of unplanned impacts such as cyclones, earthquakes, pandemics, etc.

The University would suggest that, rather than being a fault of the current tertiary education system, the observation that "New Zealand's research and innovation performance lags comparable countries", is a consequence of the very low investment by the NZ Government and NZ Industry (save a few notable exceptions) into research and development.

Determining a tertiary education future for New Zealand that primarily responds to the demands of industry has the potential to create a workforce that is obsolete; it is essential that universities train not just graduates able to respond to the immediate needs of industry but are able to flexibly and creatively respond to any future challenges that cannot be easily predicted. Specific vocational training is still important for the trades (plumbing, electricians etc), and in accredited programmes such as nursing, social work and engineering, but at tertiary level industry focused delivery is less likely to be as useful long-term than training designed to promote critical and creative thinking. Subjects where the premium is on reasoning and critical thinking rather than retention of specific knowledge and techniques are the best for future-proofing both our

economy and future graduates. At the very least, having a supply of graduates in these areas is essential, alongside those with specific skills needed in professions.

University research is often ahead of user need and direction – this is the true definition of innovation – as such we are ahead of challenges and opportunities rather than trying to be innovative in our reaction to unplanned challenges. In that sense, making university research subservient to industry need has the potential to restrict our research potential and limit New Zealand's ability to develop a knowledge economy.

Given that most developed countries invest more than double per capita of GDP than that of New Zealand in research and that it does not seem that Government is prioritizing an increase its investment, the difference at least over the next decade will need to come from foreign funders. It will take more than this to turn our commercial and business sector around to better engage in R&D in a similar way to those successful countries that also invest greater levels of Government support in true research development. It therefore makes sense to prioritise foreign research investment opportunities.

The TES could be enhanced by adding, in either the Achievement or Economic Impact and Innovation categories, the goal to "educate a flexible workforce, able to adapt in an agile way to a rapidly changing future workplace in which generative AI plays an increasingly significant role". The role of generative AI in the future of the New Zealand workforce cannot be underestimated as part of the TES, and creating graduates who can thrive in this environment is inevitably in the best interests of our country.

Priority 3: Access and Participation

In order to develop a knowledge economy that all New Zealanders will benefit from, there is a very definite need to ensure that access and participation remains a priority as part of the TES; tertiary education providers must be committed to improving outcomes for all students and ensuring that they help address the inequity issues that persist within the compulsory education sector.

Priority 4: Integration and Collaboration

While there are effective pockets of collaboration between universities, the current student and research funding mechanisms, in particular the limited volumes of funding available, encourage competition. Outside of these areas New Zealand universities are generally quite collaborative and work together to reduce duplication of effort.

Priority 5: International Education

The University of Waikato supports ambitions to increase volumes of international students in New Zealand, but questions the increased role that appears to be given to

Education New Zealand (ENZ). The success of international tertiary education in New Zealand to date has largely been through the efforts of individual institutions and the relationships that these institutions have developed overseas. The University questions the benefit of undertaking a significant global brand campaign and any reduction in individual institutional autonomy through an enhanced role for ENZ. Improved visa support from Immigration New Zealand, and a more agnostic view of emerging international student markets would likely provide a stronger return on investment than an enhanced role for ENZ.

The University would also recommend the adoption of approaches that support the development of transnational education (TNE) programmes where New Zealand tertiary institutions deliver programmes off-shore. A significant proportion of students who undertake TNE programmes with New Zealand providers will undertake at least some of their study in New Zealand, or will choose to undertake further studies in NZ. While outside the traditional view of international education, as espoused in the draft TES, TNE can help build New Zealand's profile for delivering high-quality higher education and providing strong pathways for high-achieving students.

Compiled by 9(2)(a)

Water New Zealand Submission to the Ministry of Education:

Draft Tertiary Education Strategy

The water sector is supportive of the draft Tertiary Education Strategy and its focus on lifting student achievement, broadening participation, and maximising economic impact and innovation in Aotearoa New Zealand's tertiary education system. These strategic priorities are closely aligned with urgent sector needs for workforce development and ongoing research to realise national infrastructure targets and deliver resilient, future-ready water services.

Key Recommendations

- Support the development of critical thinking, adaptability, and curiosity in all tertiary graduates—skills consistently sought by water sector employers and fundamental for addressing evolving infrastructure, environmental, and operational challenges.
- Sustain targeted investment in both applied and fundamental research, with funding prioritised for initiatives demonstrating measurable sector impact and pathways to long-term innovation.
- Strengthen collaboration and engagement between tertiary education providers, the water sector, government, iwi, and international partners, ensuring training and research reflect real-world needs and inclusive best practices.
- Maintain and expand support for inclusion pathways, especially for Māori, Pasifika, women, and others under-represented in STEM fields, while fostering work-integrated learning to help address acute talent shortages.

Water NZ is a national not-for-profit organisation which promotes the sustainable management and development of New Zealand's three waters (drinking water, wastewater and stormwater). Water NZ is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its ~3,450 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies, academia and scientists.

Our sector plays a critical role in safeguarding public health, protecting the environment, and enabling economic growth. With billions of dollars in infrastructure investment ahead and a workforce that must expand significantly over the coming decade, education reform is vital to building the skills and capabilities that New Zealand needs.

Critical Skills and Workforce Development

A substantial uplift in both the number and diversity of graduates is essential for the water sector to fulfil New Zealand's infrastructure and service ambitions. Investment forecasts

indicate major growth in water-related projects, intensifying demand for skilled professionals across technical, engineering, management, and research domains. The sector draws from a wide array of tertiary fields—science, engineering, technology, management, and social sciences—but most importantly relies on graduates who display adaptability, curiosity, and critical thinking, attributes particularly fostered by contemporary tertiary education.

Applied and Fundamental Research: Balancing Horizons

Research is a proven driver of infrastructure uplift, public health protection, sustainable resource management, and sector innovation. Both immediate, applied projects and longer-term, fundamental inquiry are required to address evolving needs and unknown risks. International and domestic studies consistently show that every research dollar invested in the water sector can generate five- to thirteen-fold returns in resilience, efficiency, and performance. Continued support for university partnerships, industry-funded PhDs, micro-credentials, and collaborative centres of excellence will help unlock both short-term and future solutions.

Inclusion and Collaboration

The sector depends on robust pathways from universities, polytechnics, and training organisations. Gaps remain in practical skills, cultural competence, digital literacy, and cross-disciplinary teamwork. The TES's goal of deepened collaboration between providers, employers, iwi, and communities is particularly valued for building relevant skills and supporting under-represented groups into rewarding sector roles.

STEM Funding and Sector Investment

Recent increases in tertiary funding for STEM fields and priority workforce areas such as infrastructure, engineering, and health are strongly welcomed. Continued growth in work-integrated learning, targeted scholarships, and research initiatives are crucial for addressing workforce gaps and adapting to industry demand. It is essential that provider funding reflects these government priorities and supports consistently high-quality outcomes.

The water sector is committed to partnership with the Ministry of Education and tertiary providers to deliver on these outcomes for all New Zealanders. The draft strategy offers a strong framework for building the workforce and research base needed for sustainable water service delivery, innovation, and adaptation for decades to come.

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

WeCreate Inc

We support the submission of the NZ Writers Guild

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

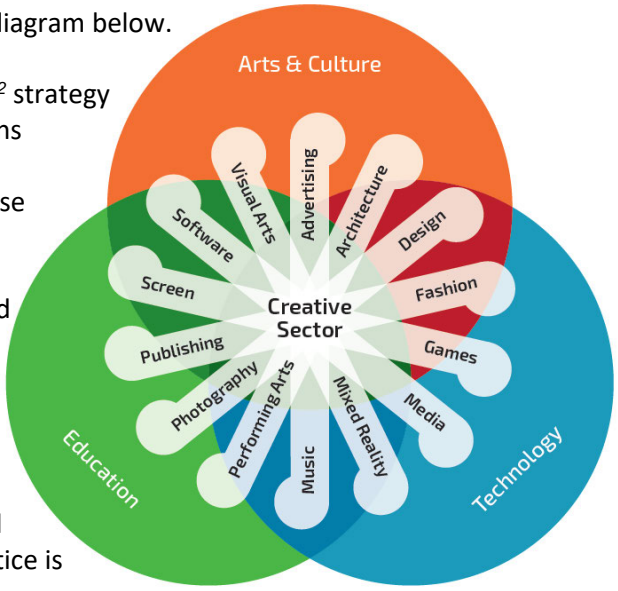
Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	WeCreate Inc
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	9(2) *@wecreate.org.nz*

WeCreate is the alliance of Aotearoa's major creative industry associations and organisations (representing 30,000+ Kiwi creators, support people, and creative businesses), which was founded in 2014 to propel growth in the sector and increase its contribution to New Zealand's social, cultural and economic prosperity. The creative economy contributes $17.5b[1] to New Zealand's GDP and, with the right policy settings, could be worth $25b by 2030. Our sector is an ecosystem and much of the talent we have is fostered in and by arts and culture organisations, as shown in the diagram below.



We draw the Ministry's attention to the Cabinet-approved *Amplify*[2] strategy that includes a *Nurturing Talent* pillar. There are a number of actions listed in *Amplify* that will be impacted by the choices made in the tertiary education strategy. *Amplify* is an all-of-government response to the needs of the creative and cultural sector.

In various parts of our submission, we have noted terminology used in the strategy that does not reflect our sector or our views of the tertiary education system. These include:

Employment	**work** is encompassing of freelancers, contractors and the self-employed
Qualifications	A portfolio of **skills** developed through both formal education, work-based-learning, and creative practice is equally relevant to our industry
Industry	The creative sector is large in terms of its GDP impact and employment, but it **does not have the infrastructure** that traditional industries (eg construction) have to enable the extent of engagement and insight provision that is envisaged in the draft strategy.

[1] Arts and creative sector profile 2024 - Infometrics report summary
[2] Amplify: A Creative and Cultural Strategy for New Zealand | Manatū Taonga | Ministry for Culture & Heritage

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

We are pleased to see *skills* included in the objective. We note that skilling *and re-skilling* the New Zealand workforce will need to be a priority for government to ensure the country, and workers, are able to keep up with the pace of change.

WeCreate's work has always had an economic focus, and we recognise the economic emphasis in the draft objective. However, "the economy" is people – both those who work in it, and those who benefit from it. We caution narrow use of the term economy, particularly in relation to education where outcomes other than just those that are economic also have importance.

We draw you attention to a new creative sector report[3] from economist Shamubeel Eaqub (commissioned by Toi Mai) that states:

"There is a persistent myth that the creative sector is low in productivity. While this appears true when measured by GDP per worker, it largely reflects inconsistent and irregular work patterns rather than low value per hour worked. When adjusted for hours worked, productivity in the sector is approximately $346,000, comparable to the agriculture sector at $317,000, and well above the economy-wide average of $197,000 per full-time equivalent worker."

We believe that the objective's focus on a "high-productivity economy" risks undervaluing creative work that may not fit traditional productivity metrics but more broadly generates significant cultural and social value, in addition to economic value. Creative professionals and creative businesses are constantly innovating (generating new ideas and new products) and operate through project-based, collaborative models that create value in intellectual property and creative and cultural exports. Additionally, creative skills and knowledge underpin innovation across all sectors of the economy[4]

We have recently written to Minister Stanford in regard to school curriculum changes and drew her attention to the benefits of the STEAM[5] approach to education. The tertiary education system has taken the traditional STEM approach but there is a strong evidence base, including from some of the world's top universities, that STEAM - where the Arts are embedded part of the learning – better prepare students for the rapidly evolving world that they will be working in. A STEAM approach would also be a step towards achieving the outcomes of the *Nurturing Talent* pillar of *Amplify*.

We support the focus on a system that delivers for Māori, Pacific peoples, the disabled and those from underserved communities. A diverse workforce is critical for the creative sector, and we need an education system that is accessible and meeting the needs of all learners.

We recommend adding explicit recognition that innovation includes cultural and creative innovation, and that quality of life encompasses cultural richness, social cohesion, and creative expression as fundamental objectives for tertiary education. The tertiary education system must also be able to respond quickly to emerging skills and industries. This is not currently the case.

The only reference to Te Tiriti in the draft strategy to is in the Integration and Collaboration section. We would expect there to be a lot more explicit reference to how the the legislation states the WHAT it must also express the HOW in legislation and policy to compel legislative compliance.

[3] Skills in the creative sector

[4] For example : the communications team at RocketLab, the design team at Fisher & Paykel Healthcare

[5] STEM vs. STEAM: Why the Arts Are Becoming Essential to Science and Tech Education in 2025

2. Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

The strategy correctly identifies technological change as a key driver, particularly AI and digital tools. However, it underemphasises how these technologies are transforming work and creating new hybrid roles requiring both technical and creative skills, along with changes in business models. We submit that there should also be a balance of emphasis on skill-development and the traditional qualification model.

Tertiary education's contribution to regional development is currently under threat from the latest round of reforms of vocational education. Through the work of CreaTer , which we helped to establish, WeCreate understands the realities of educators in polytechnic and private training institutions across the country. When considering this Strategy, we encourage the Ministry to take a fresh look at all parts of the tertiary education system and how they can be invested in and supported to deliver the workforce that the country needs. Innovative models are also needed and the work of organisations such CodeNZ that connects the video games industry in Dunedin, with Otago Polytechnic and the University of Otago to help with curriculum development and provide industry-ready programmes.

The creative sector faces unique challenges that are not adequately addressed in the draft:

- **Portfolio careers**: Creative professionals increasingly work across multiple disciplines and types of employment
- **Intellectual property economy**: Growing importance of IP creation, management, and monetisation
- **Global digital platforms**: The impact of these tech companies on New Zealand's economy is understood by the creative and tech sector but is often overlooked by government. Effective government policy development in relation to these platforms is needed to ensure that New Zealanders can fairly participate in the global digital economy.

The strategy should better recognise that an effective education system is structured to deliver, in a timely manner, different approaches to work-integrated learning, entrepreneurship, internships with small creative enterprises, freelance mentorship programmes, and project-based collaborations.

We recognise the economic, social and cultural value that international students bring to New Zealand but caution any form of reliance on this source of income to prop up the tertiary education system. As we saw during the pandemic, some institutions whose business model relied too heavily on international students suffered significantly with a flow-on effect to their wider operations, including cuts to creative programmes.

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

Yes, we recommend adding a sixth priority: **Cultural and Creative Innovation**. This would recognise the creative sector's distinct contribution to economic development while ensuring creative disciplines receive appropriate support within the broader strategy and the system.

Alternatively, the existing priorities should be expanded to explicitly include creative sector considerations, particularly around innovation that extends beyond purely technological or scientific domains. Please refer to our comments above in regard to the STEAM approach to education.

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. Achievement

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

Achievement in creative disciplines requires nuanced measurement approaches. Traditional completion rates may not capture the value of creative education where students often pivot between programmes, combine qualifications, or pursue alternative pathways that better suit creative career patterns. This mirrors the pattern that many will experience in their work life and it is important that this approach to measuring success is also woven through the tertiary education system.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

The focus on "distance travelled" measures is particularly valuable for creative students, who often enter programmes with diverse backgrounds and non-traditional educational pathways. However, employment outcomes need creative sector-specific metrics that account for freelance work, portfolio careers, and creative entrepreneurship. When looking at “employment outcomes” for student achievement, the system needs to allow for freelance and self-employment, not only the 40-hour-week for one employer that is the traditional model. This needs to be embedded at the system level, not left to individual institutions to develop.

Do you have suggestions for additional activities to support this priority?

1) Develop creative sector-specific success measures including creative business start-ups, IP creation, and cultural participation
2) Strengthen pathways between secondary arts education and tertiary creative programmes
3) Create mentorship programmes connecting creative students with industry professionals
4) Implement flexible completion models that accommodate creative sector work patterns

5. Economic Impact and Innovation

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

This priority is crucial but needs explicit recognition that the creative industries are innovation drivers. The creative sector develops new business models, technologies, and approaches that influence other industries. However, the strategy's emphasis on "job-ready" graduates may not suit creative education, which often emphasises creative thinking, experimentation, and entrepreneurship over traditional employment.

We are very pleased to see the need for transferable skills acknowledged in the strategy and note that these are often learned in creative subject areas, or through the STEAM approach.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

The activities focus heavily on traditional industry partnerships but don't address the unique structure of creative and tech industries, dominated by micro-enterprises and freelancers. While more connection to industry is welcomed, the premise of this is that industry is both formed and resourced sufficiently for this type of engagement. This is particularly relevant for new and emerging industries who make take time to (or never) establish an industry body. The experience of Toi Mai in building relationships with the creative and tech sectors is informative. It takes time and consistency to build relationships with industry before a working model can be found.

We caution narrowing research investment into “national priorities”. These change in regular, short cycles which can undermine investment in longer term research and also exclude research in areas that are a priority for communities and business.

We recommend that entrepreneurial education be available at secondary school level, not left until a student is at the graduate stage of learning.

It is concerning that, in the examples of contributing activities, it seems to be assumed that research only occurs in universities, and that the existing structure of the tertiary education system where university education is deemed “better”, or more valued, should continue. We strongly question this assumption and would expect that in developing this new strategy, the focus should be on what New Zealand needs from tertiary education in the future, not carrying on with what has existed in the past. A system that prioritises skilling and re-skilling and life-long learning, will no doubt look very different to the one-and-done qualification for a single career.

Do you have suggestions for additional activities to support this priority?

1) Establish (and resource) a Creative Economy Skills Advisory Group to complement Industry Skills Boards
2) Develop creative entrepreneurship programmes across all tertiary levels
3) Enable IP commercialisation support specifically for creative graduates
4) Strengthen connections between creative education and creative & cultural export development
5) Support research into creative technologies and their applications across sectors

6. Access and Participation

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

We support the focus on meeting emerging workforce needs, including upskilling and retraining.

Access is particularly important for creative education. Creative education can be an alternative pathway for diverse learners. However, cost barriers disproportionately affect creative students, who often cannot access student allowances due to irregular work patterns and who face additional costs for materials, equipment, and portfolio development.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

Some of the language and positioning of the various providers of tertiary education that we have noted above is carried on in this section. We recognise the list given is "examples" but many of these are written with context of the tertiary system structure as it currently is, not how an aspirational strategy might reimagine it. For example, it is not only universities that might partner with schools. The creative sector values the connections that polytechnics, PTEs and creative professionals and businesses sustain with schools and their learners.

Regional provision is vital for creative industries, which are increasingly distributed beyond main centres. Digital distribution can make a creative career accessible to almost anyone with an internet connection. However, the strategy needs to address the unique infrastructure requirements for creative education, including specialised equipment, software, and industry connections.

Do you have suggestions for additional activities to support this priority?

1) Develop micro-credential pathways for creative skills development
2) Create equipment and software access programmes for creative students
3) Establish regional creative hubs connecting tertiary education providers with local creative communities (this may be in partnership with the regional arts network)
4) Support flexible delivery models that accommodate creative project cycles
5) Address financial barriers specific to creative students, including materials costs and portfolio development

7. Integration and Collaboration

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

Collaboration is fundamental to creative practice and industry success. The creative sector's project-based, interdisciplinary nature makes it an ideal model for the collaborative approaches the strategy seeks to promote. Successful collaborations require sustained investment over time and need to be valued by the system as much as other outputs. Please note our comments in the introduction relating to industry engagement.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

The activities appropriately emphasise partnerships but need to recognise that creative industry partnerships often involve different models than traditional industry relationships, including project collaborations, mentorships, and community engagement rather than formal employment pathways.

Do you have suggestions for additional activities to support this priority?

1) Develop creative cluster partnerships connecting education providers with creative precincts
2) Establish international creative exchange programmes to build global connections
3) Support iwi and Pacific creative partnerships that honour indigenous creative practices
4) Develop shared creative facilities and makerspaces across institutions

8. International Education

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments

New Zealand's creative education has strong international appeal, particularly in film, design, and digital media. However, the strategy should recognise that international students in creative fields often contribute differently to the local economy through creative projects, cultural exchange, and ongoing international networks.

How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	International creative students contribute to innovation by bringing diverse perspectives and techniques. They often become cultural ambassadors for New Zealand creativity globally and create ongoing business connections. Creative education exports also enhance New Zealand's cultural diplomacy and soft power internationally.
Do you have suggestions for additional activities to support this priority?	1) Develop creative education export strategy highlighting New Zealand's unique creative strengths 2) Create alumni networks to maintain connections with international creative graduates 3) Support international collaborative projects between students and industry 4) Market New Zealand as a creative innovation destination, not just a scenic location

System Delivery

9. **Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?**
10.

Provider or Agency Type	Comments on roles and expectations
Universities	Should strengthen creative research commercialisation and interdisciplinary programmes. Need better recognition of creative pathways and practice-based research methodologies, along with embedding the STEAM approach to learning.
Wānanga	Critical institutions for the growth of the Māori creative economy and for sustaining Mātauranga Māori curricula in tertiary and other education settings.
Polytechnics	Vital for creative industries skills training. Specialised creative facilities and equipment require more consistent investment.
Private Training Establishments (PTEs)	Often provide flexible, industry-responsive and cutting-edge creative training. Should be supported to maintain quality while serving the creative sector's diverse needs. Need recognition of their role in creative entrepreneurship development.

Industry Skills Bodies (ISBs)	Need to be as responsive to industry needs as the WDCs have been. Narrowed focus and reduced funding to ISBs over WDCs is a concern for our sector.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	All agencies should draw on sector support to develop in-house creative sector knowledge and expertise. Funding models that are flexible and responsive to creative industry characteristics are needed. MBIE should integrate creative industries into innovation policy, in addition to traditional STEM and other emerging tech sectors.
Other (please specify)	

Monitoring Outcomes

11. **Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.**

The monitoring framework needs creative sector-specific indicators:

Achievement indicators:

- Creative business start-up rates by graduates
- Portfolio career development and sustainability
- Creative IP creation and commercialisation
- Participation in creative communities and networks

Economic Impact indicators:

- Creative export revenue generated by graduates
- Cross-sector innovation projects involving creative graduates
- Cultural and creative industry work rates
- Creative entrepreneurship success rates

Access indicators:

- Participation rates in creative education by targeted demographic groups
- Geographic distribution of creative education opportunities
- Financial accessibility of creative programmes

Integration indicators:

- Industry collaboration projects in creative fields
- Interdisciplinary creative project completion rates
- International creative partnerships and exchanges

The current focus on traditional employment outcomes may not capture the value created by creative graduates who often work as freelancers, creative entrepreneurs, or in non-traditional employment arrangements.

Final Comments

12. Do you have any other comments on the draft Tertiary Education Strategy?

WeCreate appreciates the strategy's focus on economic development and innovation. However, we encourage the Ministry to recognise that creative industries are already significant economic contributors and innovation drivers that require specific consideration within this framework.

Key recommendations:

1. **Explicit recognition** of creative industries as innovation drivers alongside technology and science
2. **Alternative governance models** for creative sector input beyond traditional Industry Skills Boards
3. **Flexible success metrics** that capture the diverse ways creative graduates contribute to the economy
4. **Investment in creative infrastructure** including specialised equipment, software, and facilities
5. **Support for creative entrepreneurship** as a distinct pathway requiring different approaches than traditional work

The strategy's success will depend on recognising that New Zealand's creative sector offers unique competitive advantages internationally and requires tailored approaches that honour both our economic potential and cultural significance.

We look forward to working with the Ministry to ensure the creative industries are effectively supported within this strategic framework and request ongoing consultation as implementation plans develop.

Te Tāhuhu o te Mātauranga
Ministry of Education

We **shape** an **education** system that delivers **equitable** and **excellent outcomes**

He mea **tārai** e mātou te **mātauranga** kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**

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Te Kāwanatanga o Aotearoa
New Zealand Government

9(2)(a)

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Thank you for the opportunity to submit with regards to the Draft Tertiary Education Strategy. The following submission is based on the following factors:

- **Value for money** must be a guiding principle. Systemic change is needed to ensure that public investment in tertiary education delivers meaningful outcomes.
- **Skill shortages** continue to persist during periods of economic growth, driven by emigration of qualified New Zealanders and a growing NEET population (currently 82,000) who have not had the opportunity to complete a Level 4 qualification during a period of economic contraction or only have a Level 3, when the sector is requiring skilled tradespeople.
- **Ministry of Business, Innovation and Employment (2019)** research identified high job turnover as a key risk to apprenticeship completion. It recommended employer incentives and off-the-job training options to improve outcomes.
- **Ako Aotearoa (2014)** research highlighted systemic (economic contraction), employer, and personal factors contributing to concerningly-high non-completion rates of apprenticeships; these issues that remain relevant today.

Overall Summary Statement

The strategy's objectives are sound and its priorities well-framed. However, several critical considerations must be addressed to ensure the strategy delivers on its promise:

- **Employment outcomes must be a system-wide priority.** Tertiary education must lead to real jobs, especially in vocational and trades pathways.
- **Funding models for skills-based training must be redesigned.** Learners should be able to complete qualifications regardless of employment status.
- **Work-based learning must be rebalanced.** Employers must be willing and able to take on untrained workers and invest in their development. Without this commitment, work-based models risk exclusion and inefficiency.
- **Clarify the concept of "distance travelled."** In practice, Level 4 programmes often take as long, if not longer, to complete than Level 7 degrees. Time and effort (not just qualification level) must be recognised in measuring learner progress.

Employment outcomes must be a system-wide priority.

One significant driver of change needs to be employment outcomes. Tertiary education must lead to employment. Whether it's a Level 7 nursing graduate or a Level 4 apprentice,

the system must ensure clear pathways into work. Employment outcomes should be a core metric in strategy, funding, and delivery design.

Current economic conditions expose a critical flaw: apprentices laid off mid-training lose access to their qualification and are unable to complete in a timely manner (many not completing at all), wasting taxpayer investment and undermining workforce development. The system must enable learners to complete their training regardless of employment status.

To achieve the any tertiary education objective, the system needs to have enough flex in it to enable first and foremost an upskilling of New Zealanders with the first step being the 'ticket' or trades qualification.

Without factoring in both employment outcomes and employment trends, there is a risk that we do not respond appropriately to demographic change, global trends and pressures, student expectations and career patterns and fiscal constraints.

Part of the solution here is a redesign of the funding and reporting model to switch to programmes of study. The other part is to enable apprentices to complete training in a provider-based setting if they should find themselves out of employment.

Funding models for skills-based training must be redesigned.

While the strategy uses all the right words – flexible, seamless and agile, we have several qualifications and skill-areas (particularly the trades) which rely on the traditional apprenticeship model and are only funded for work-based delivery. This does not account for times of unemployment and the high turnover rate of young people between employers.

At this point and time, provider-based delivery is funded through a Programme of Study (PoS) (reported through the SDR); while work-based delivery funded through a Package of Industry Training (PIT) (reported through the ITR). Packages of Industry Training (PIT) bring together standards to work towards a qualification and tend not to have the coherence of a programme of study, which is curriculum-based. Programmes can have the ability of embedding standards (ie working as a PIT) and flexing to the need of the student who is the ultimate recipient of that learning.

A solution here is to unify funding and reporting under Programmes of Study. This enables flexible delivery, supports completions, and allows assessment on-the-job or off-the-job. One reporting line (through SDR) focused on completions would make the system more responsive and reduce non-completion rates.

Work-based learning must be rebalanced.

The strategy overemphasises work-based learning. The reality is that New Zealand is a country built on Small to Medium Business (SMEs), which may not have the capacity,

capability or time for work-based or integrated training. Work-based training does play a critical role in our overall workforce, but it should not be seen as a core solution to our skills-gap. The reality is businesses want to employ skilled people to begin with and when having to put aside time (which is dollars) for training there is a real tension.

Professional vocational pathways (e.g. nursing, teaching, social work) rely on structured, provider-based training. For school leavers, work-based models are often inappropriate. Solid packages of learning offer faster, more reliable workforce entry.

The strategy implies a growing emphasis on work-based or integrated training across Levels 1–6, alongside a reimagining of university–industry collaboration. This is precisely the space where SMEs dominate—and where capacity constraints are most acute. Industry Skills Boards (ISBs) must prioritise engagement with SMEs, not just large corporates. To date, Workforce Development Councils (WDCs) have leaned heavily on dominant voices, or a small unrepresentative number of voices, that do not represent the full spectrum of industry needs. ISBs must go beyond asking whether work-based training is desirable. They must determine in any advice given to TEC whether industry is willing—and able—to invest time, money, and resources into training. This includes release time for both trainees and supervising staff. TEC must have a high confidence in such advice. Support for work-based learning is not enough. The system must embed guarantees that industry will take on and invest in unqualified or differently qualified workers for the duration required to complete their training.

Clarify the concept of "distance travelled."

Our system is fundamentally problematic in the Levels based approach creates false assumptions. One assumption is that a three-year degree is longer than a Level 4 apprenticeship. This is not the case, an apprenticeship on average, takes a minimum of three years to complete (typically four). The reality is that the trainee might be on a 120 credit PoS or PIT but this is effectively part-time. Yet Level 4, graduates are fully qualified tradespeople, while Level 7 graduates often enter at a provisional level and still have some distance to travel towards full registration or recognition.

The draft strategy talks about the importance of "distance travelled" and it can be easily inferred (and has been inferred by groups such as ConCove) that this means distance travelled through to Level 7 and the hope that this will mean Degree Apprenticeships in areas such as Construction. As such, there is a real risk of credential creep.

Not all areas are served well by Level 7 being the gold standard and while industry might see Level 7 as a nice-to-have optional extra, not all industries will follow through to support their workers. WelTec has had this experience directly with the Level 7 Degree Apprenticeship in Engineering where we had strong support from industry but limited follow-through in students enrolling. Feedback from industry was that they didn't have the time to release their workers for study/training (including on-the-job training).

It is imperative that where Level 4 is the recognised ticket, that acknowledgement of distance travelled is not the level of the qualification, but the time taken to complete. As such, a priority and imperative should be shifting mechanisms to enable greater completion rates of Level 4. One further suggestion is that TEC requires ISBs to work with industry to ensure any Level 3 pre-trade training contributes to the Level 4 apprenticeship as is the case with the Level 3 Certificate in Electrical Pre-Trade (30 credits is recognised at Level 4 which equates to the first year of the apprenticeship).

Again, thank you for the opportunity to submit. I do hope that this submission is food-for-thought and enables you as the decision-makers some ideas about how to get the system working for both New Zealand as a country and New Zealanders.

Te Tāhuhu o te Mātauranga
Ministry of Education

Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

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Submitter details

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Organisation name	Whitireia and WelTec I Te Pūkenga
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
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Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The objective of enabling "(…) people to succeed with knowledge and skills that advance and innovative, high-productivity economy, and improve quality of life" is positive and overall can be supported.

It is noted that the rationale explaining the objective is predominantly focused on economic growth. In order to facilitate economic growth through education, there are important factors to consider:

- In order to contribute positively to the economy, students have to be enabled to complete their studies, particularly in work-based programmes (where we know that there is a very high non-completion rate). This is not only the case for the traditional apprenticeships, but also for degree apprenticeships.

- Students in the education system need to be able to complete their studies, independent from the economic downturn. In other countries (e.g. Germany), there is specific legislation that protect apprentices and enable them to complete their apprenticeships within 2-3 years, holding the employer accountable for the completion of their qualification. In Aotearoa NZ, apprenticeships can take more than twice the time, and apprentices have no specific legal protection, therefore are the most vulnerable in the system, as they currently require an employer to complete their qualification and are dependent on their employment. If a young person in the system is losing their employment, they are also losing their opportunity to complete their qualification, and therefore their professional career and future. This costs the NZ economy with every uncompleted apprenticeship.

  These are the key aspects that are barriers to enabling education being a positive contributor towards economic growth:

  - There is no protection for students who study a work-based programme, and no guarantee that they will have completed their studies within a given timeframe. Recent issues regarding a lack of required work placements in industry have been raised by Canterbury Engineering students, and Food Technology students at Massey University.

  - Employers are not held accountable when laying off apprentices in times of economic downturn. It is common practice for employers to lay off apprentices as the first group, before laying off permanent staff.

  - Employers are not held accountable if they are keeping their apprentices for 6 years or longer, and continue to gain from the apprentice's work contributions, but as employer can continue to pay training wage.

  - Research from Ako NZ found that non-completions of apprenticeship training is a significant issue in New Zealand noting that the key factors that led to non-completion were at the levels of: system (in an economic down-turn apprentices are more at risk of being made redundant), employer (workplace culture, employer's attitude to training) and personal (age, gender, ethnicity, prior education, employability skills and personal reasons).

  - Students need to be able to enter internships and/or enter their employment without being asked to bring their own equipment. This is a significant barrier for young students and graduates who are not in the financial position to spend thousands of dollars on tools and materials, that ultimately only the employer benefits from. Not only is this a barrier for students to enter employment, but it also reinforces socio economic inequalities.

  - Furthermore, there is no need for an apprenticeship/in-work training to take 4+ years, particularly given that a Bachelor's degree in comparison only takes 3 years.

- In times of economic growth, skill shortages are being filled with overseas workers, due to a lack of skilled people coming from our own education organisations. This reinforces the systematic issues with in-work education.

If education should have a dominant focus on the contributions to economic growth, it is important to look at the full system and improve systematic issues that contribute to barriers in this area.

2. Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?

Systematic changes to the challenges mentioned in the above will positively add to the economic impact on work-based education:

- Enable a mechanism for those apprentices that were laid off mid-training to complete their studies in a simulated work environment (ITPs). This will mitigate the real risk of the dependency on economic ups and downs and will provide a pathway to success in volatile times. This is a key aspect and should be addressed as soon as practicable. Those initiatives should be appropriately supported as it will significantly increase completion rates.

- Introduce legislation that clearly outlines expectations and accountabilities of employers that are looking after apprentices in their business, including the maximum time for an apprentice to complete their qualification, incentivising the employer to dedicate specific training time towards the apprentice so they can successfully complete their qualification in the given timeframe.

- Require industry to take accountability for the economic future of Aotearoa and incentivise companies for completed apprenticeships in their business (e.g tax relief, or bonus or penalty payments).

Priorities for this Tertiary Education Strategy

3. Do you think the Tertiary Education Strategy should have any additional or different priorities?

- If education is intended to be so closely aligned to economic growth and industry, there needs to be a focus on the way industry works and how industry can contribute towards this focus:

  A businesses' primary objective is to return profit, and by assuming that businesses will prioritise social responsibilities (such as education) we must realise that if not incentivised, it is unlikely for businesses to take profit cuts into account for the benefit of education outcomes.

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New Zealand Government

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Draft Tertiary Education Strategy

Targeted Consultation Response Template

Te Kāwanatanga o Aotearoa
New Zealand Government

Consultation process

This draft of the Government's new Tertiary Education Strategy (TES) is being provided for targeted consultation with sector stakeholders ahead of finalisation later in 2025.

The development of the TES has been informed by targeted engagement with a range of organisations and groups directly affected by the strategy, including tertiary education providers, industry bodies, and student and community representatives. This engagement helped shape the priorities and direction of the draft strategy.

The consultation on the draft TES builds on this earlier engagement and is intended to ensure the strategy is fit for purpose and able to guide meaningful system improvement.

Submissions process

Consultation is open for a four-week period until 5pm on Tuesday 30 September.

Feedback can be provided via:

- completing an online survey https://education.surveymonkey.com/r/DraftTES
- or sending written feedback tertiary.strategy@education.govt.nz

Please note that this is a targeted consultation, and the draft TES is being shared with your organisation in confidence. It can be shared for the purposes of informing your organisation's feedback on the draft TES, however, we ask that it is not circulated further without prior permission from the Ministry of Education.

Any questions you may have on the consultation process, or any other aspect of the Strategy development should also be directed to tertiary.strategy@education.govt.nz.

Privacy and publication of submissions

The information you share in this consultation is being collected to inform the content of the final TES. It will be used by the Ministry of Education, the Ministry of Business, Innovation and Employment, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your organisation name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process. If you consider that we should not publish any part of your submission, please indicate which part of your submission should not be published and why, for example for privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982, which requires the release of information unless there is good reason under the Act to withhold it. We will consult with you before releasing any information that you request not be published. If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Submitter details

Full name	9(2)(a)
Organisation name	**Wintec Institute of Technology**
Organisation category (please indicate):	• Educator group • Industry • Polytechnic (including divisions of Te Pūkenga) • Private Training Establishment • Student association • University • Wānanga • Workforce Development Council • Other (please specify)
Role/position	9(2)(a)
Request to withhold part or all of submission	*Please indicate which part of your submission should not be published and why.*
Email address *For contact in response to Official Information Act request only.*	oia@wintec.ac.nz

Objective and Drivers for Change questions

1. **Do you have any comments on the draft objective for tertiary education?**

The objective statement is generally aligned with current practice, but it lacks grammatical parallelism and could benefit from refinement for clarity.

It is recommended that the objective be amended to include aspirations of whānau, hapū, and communities, alongside economic and quality-of-life outcomes.

The strategy should reflect the operating realities of providers, acknowledging that they are impacted by the same challenges the TES seeks to address.

2. **Do you have any comments on the drivers of change in tertiary education and how the system should respond to these?**

Climate change and the changing Taiao (environment) should be added as a key driver, particularly for vulnerable communities. Enduring partnerships with iwi and hapū will be critical in responding to these changes.

Providers operate in a complex environment influenced by demographic shifts, skill shortages, rising costs, compliance burdens, and funding instability. These factors must be acknowledged in the strategy. While providers can build credentials to meet industry needs for a skilled workforce, the ability to generate sustained demand — a pipeline of ākonga — cannot rest solely with tertiary education organisations (TEOs). It requires a coordinated, system-wide approach involving government, industry, the compulsory education sector, and TEOs working together to align aspirations, pathways, and opportunities.

Priorities for this Tertiary Education Strategy

3. **Do you think the Tertiary Education Strategy should have any additional or different priorities?**

We would also like to hear your feedback on the individual priorities for the tertiary education sector.

4. **Achievement**

To what extent do you agree that Achievement should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	Achievement is currently framed in largely economic terms, which overlooks broader educational and societal benefits. A more holistic definition is recommended. The concept of measuring 'distance travelled' is valuable, but the strategy lacks the system-wide commitment to collaboration and data sharing needed to support it. The contributing activities are generally supported, but there is a need for clearer

	articulation of what success looks like for learners, employers, and communities.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

5. **Economic Impact and Innovation**

To what extent do you agree that Economic Impact and Innovation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	There is agreement that this should be a priority, but the current contributing activities may not effectively support its achievement. There is a disconnect between the TES goals and the incentives created by the Quality Evaluation component of TREF. The strategy promotes industry and community impact, while TREF rewards academic citations. This misalignment may hinder the realisation of this priority. It is recommended that TREF adopt a metric based on output quality using discipline-weighted journal rankings and a capped number of outputs per researcher while also acknowledging the performative nature of particularly Māori outputs (Public engagements) and lack of Māori or indigenous internationally ranked journals. The output for the latter should simply be to contribute to any academic journal. Greater recognition is needed that Māori (iwi and hapū) are key actors in regional development, this is particularly true for our region. The sector must partner with them to achieve equitable economic growth.

To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

6. **Access and Participation**

To what extent do you agree that Access and Participation should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	There is strong agreement that this should be a priority, but the strategy should include a focus on developing education pathways between tertiary providers and iwi and hapū. The discussion on secondary-tertiary transitions lacks depth. While contributing activities mention this, the narrative does not clearly outline the intended changes. Furthermore, previous Tertiary Strategies have remained largely silent on the needs of second-chance learners — adults who may be returning to education after time in the workforce, caregiving, or other life circumstances. This silence is concerning given that meeting the needs of future growth industries will likely require significant retraining and upskilling of the current workforce. Many of these learners will not come directly from school but will need flexible, accessible, and culturally responsive pathways back into education. A more inclusive strategy would explicitly acknowledge the role of lifelong learning and the importance of supporting adult learners to re-engage, especially in regions and communities where economic transitions are already underway.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree

Comments	
Do you have suggestions for additional activities to support this priority?	

7. **Integration and Collaboration**

To what extent do you agree that Integration and Collaboration should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	There is support for this priority and its contributing activities, but the language used in the strategy often centres on universities, which may unintentionally marginalise polytechnics and other tertiary providers. The strategy should promote a unified approach to quality assurance and reduce duplication between NZQA and other bodies.
To what extent do you agree the expected changes and contributing activities will effectively support achievement of this priority.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	
Do you have suggestions for additional activities to support this priority?	

8. **International Education**

To what extent do you agree that International Education should be a priority in the Tertiary Education Strategy.	• Strongly agree • Agree • Neutral • Disagree • Strongly disagree
Comments	The draft strategy identifies International Education as a priority. However, in its current form it risks being treated in isolation, rather than as an enabler that strengthens all other priorities. International education's true value lies not only in its contribution to the economy, but in how it enriches teaching, research, community development and graduate success across the tertiary system.

	Integration across priorities International education should not be viewed solely as inbound recruitment. Its benefits flow across the system, including improved student achievement, stronger pathways to employment, deeper community and iwi engagement and enhanced research and innovation. Explicitly embedding international education into all priorities would better reflect its system-wide impact. **Meeting international student expectations** Boosting international numbers must be matched with a clear commitment to supporting their needs. This includes employability pathways, cultural recognition, integration with domestic learners and wider public understanding of the value international students bring. Without this, growth targets risk being undermined by poor experiences and reputational damage. **Soft power and global connectivity** International education plays a critical role in strengthening New Zealand's global influence and relationships. Graduates who study here often become lifelong ambassadors for New Zealand, while outbound students extend our international reach. Recognising international education as a tool of soft power would position it more clearly as part of New Zealand's long-term diplomatic, trade and innovation strategy.
How do you see this priority working with, and contributing to, the other Tertiary Education Strategy priorities?	**Balanced focus on inbound and outbound** The current framing of success focuses primarily on inbound student numbers. This is important, but outbound mobility of New Zealand students is equally critical. Opportunities for domestic students to study, work, or intern overseas build global competencies, expand New Zealand's networks and strengthen our reputation internationally. Outbound participation should therefore be included as a measure of success alongside inbound growth. **Measuring broader benefits** Success should be measured not only by economic impact, but also by the social and cultural value international education brings.

	Inbound students enrich classrooms and communities through cultural exchange, while outbound experiences help New Zealand students develop adaptability, intercultural skills and international employability. These outcomes should be explicitly recognised in the measurement framework.
Do you have suggestions for additional activities to support this priority?	**Regional impact and equity** International education strengthens regional communities by bringing students, talent, and global connections beyond the main centres. Similarly, outbound mobility opportunities can help level the playing field for regional and underrepresented learners by exposing them to experiences they may not otherwise access. This connects directly to the strategy's Access and Participation priority. **Reciprocity and partnerships** International education should be framed as a reciprocal exchange rather than a one-way flow. Joint programmes, research collaborations, staff exchanges and strategic partnerships with overseas institutions create lasting value. These partnerships extend beyond education into innovation, trade and regional development, aligning strongly with the Integration and Collaboration priority. **Graduate outcomes and workforce needs** International students contribute to filling skills gaps in New Zealand's workforce, particularly in areas of national priority. Outbound experiences for domestic students also build skills that employers demand, including global awareness, adaptability and cultural competence. Graduate outcomes, both inbound and outbound, should be central measures of international education's contribution.

System Delivery

9. Do you have any comments on the roles and expectations for different parts of the tertiary education system in delivering the Tertiary Education Strategy?

Provider or Agency Type	Comments on roles and expectations
Universities	The use of terms like 'universities' versus 'tertiary providers' is inconsistent and may obscure the role of ITPs. Consistent terminology is recommended.
Wānanga	Encourage collaboration across the sector.
Polytechnics	The mention of a 'federation structure' for polytechnics may no longer be accurate given current organisational changes.
Private Training Establishments (PTEs)	Encourage collaboration across the sector.
Industry Skills Bodies (ISBs)	The roles of ISBs, WDCs, and NZQA need to be clearly defined to avoid overlap and confusion. The strategy should clarify which responsibilities lie with each entity.
Relevant Government Agencies (e.g. TEC, MoE, NZQA, MBIE)	NZQA needs to reduce cost of compliance on organisations. There is an opportunity for MoE, TEC, and NZQA to strengthen their coordination and provide a more unified approach to the requirements placed on tertiary providers.
Other (please specify)	Provider resilience and financial sustainability should be explicitly acknowledged as prerequisites for successful system delivery.

Monitoring Outcomes

10. Do you have any comments on the proposed approach to monitoring progress against the TES priorities? Please include any suggestions for how progress could be monitored, including additional indicators.

The strategy should better articulate long-term outcomes to support meaningful impact measurement beyond immediate outputs.

Final Comments

11. Do you have any other comments on the draft Tertiary Education Strategy?

What we measure must align with the broader expectations placed on tertiary providers, while also recognising the constraints of our capacity and the diversity of systems we operate within.

All tertiary providers should be supported and encouraged to collaborate with one another, fostering a more connected and cohesive sector. The TES must explicitly recognise the critical role played by government

agencies, industry and the tertiary sector. This level of collaboration is critical to achieving the objectives of the strategy.

Demographic data for the Waikato highlights a growing youthful Māori population, complemented by highly qualified immigrants who are choosing to make the region their home. To respond effectively, the TES must provide flexibility that enables strong partnerships with key stakeholders and supports the region's increasing diversity, ensuring education remains responsive to the future workforce of industry and meets the needs of all communities.

There are ongoing challenges within current funding mechanisms that could benefit from further refinement to better reflect the diversity of tertiary providers and the unique contexts in which they operate. A well-designed strategy could help guide these improvements by promoting greater alignment, responsiveness, and equity across the sector.

While diversity of provision can support learner choice, funding the same programme across multiple providers may lead to inefficiencies, duplication of effort, and fragmented learner pathways. It can also dilute quality assurance and stretch limited resources across institutions that may not have the scale or infrastructure to deliver consistently. A more coordinated approach could help ensure that funding supports complementary, rather than competing, provision - maximising impact and sustainability across the sector.

International Education should be positioned not just as an economic driver, but as a cross-cutting enabler of the entire tertiary system's success. By embedding international more deeply into all priorities, balancing inbound and outbound measures and recognising its social, cultural, regional and diplomatic contributions, the strategy can better capture the full value of international education for New Zealand.

Finally, positioning polytechnics solely under the Education and Training Act would ensure governance frameworks that are better aligned with the unique mission of vocational education, supporting agility and responsiveness to regional and ākonga needs, while still upholding government priorities - without the additional compliance layers associated with the Crown Entities Act.

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