

Consultation Key Themes and Recommendations

This report outlines the key themes and recommendations from the open consultation on the proposed Short Course Guidance document. The purpose is to ensure clarity, feasibility, and alignment with industry needs while maintaining safety and accessibility in training and assessment processes.

Note: *The themes and recommendations are based on the feedback received from the original 28 March closing date. The consultation has subsequently been extended to 11 April and addition themes and recommendations shall be added after this date.*

Key Themes

1. Clarity in Language

- The document should replace “**should**” with “**must**” to remove ambiguity and provide clearer, more authoritative guidance.
- Ensuring mandatory language will promote consistent compliance and interpretation across training providers and industry stakeholders.

2. Use of Simulated Environments for Assessment

- Restricting simulated environments creates major barriers to learning and assessment.
- Simulated environments are critical for preparing learners before entering high-risk workplaces.
- Prohibiting simulated environments may put learners at risk in live workplace settings, particularly in smaller businesses that may lack the capacity to provide safe real-world assessment conditions.

3. Pre-requisite Standards

- Requiring learners to complete a pre-requisite standard before being assessed in a related unit may create unnecessary barriers to learning and progression.
- There is a need for clarification on whether completion of the pre-requisite requires full assessment or only training before progressing to the subsequent unit.

4. Standard Levels and Alignment

- The current levels assigned to standards are too high compared to the intended learning outcomes and practical applications.
- The standards should be reviewed and better aligned with realistic training delivery and expected industry competencies.

5. Verification and Verifier Training

- Verification could be problematic due to a lack of training and guidance.
- Verifiers must hold current standards or qualifications and undergo specific training to become verifiers.
- Additional guidance is needed on verifier qualifications and appropriate training for verifiers.
- The use of verifiers will be a barrier for small businesses (SMEs), potentially impacting their ability to upskill staff and meet compliance requirements by limiting access to training and assessment.
- Verification hours should be included as part of the assessment process to ensure accurate and comprehensive evaluation.

6. Site Access and Workplace Experience

- Assessors may face barriers in accessing sites for conducting assessments, particularly for lifts and crane operations such as truck loader cranes.
- There is a need to consider experienced operators and learners within the guidance, ensuring that experience and prior learning are considered.
- Learners may have difficulty accumulating the required workplace hours due to infrequent exposure to certain tasks and machinery. For example, electricians and roofers may use equipment like Elevating Work Platforms (EWPs) intermittently, necessitating tailored assessment approaches.

7. Credit Allocation vs Practical Training

- The proposed credits for training and assessment may make some or all standards unachievable in a commercial setting resulting in courses that are too long.
- The ratio of 3.5 hours per credit for assessment is impractical, as the majority of time with students is spent on training, which is the most time-consuming part. There needs to be a better balance of hours between training and assessment.
- There is concern over reliance on credit values to determine delivery/assessment time, as any credit value should reflect actual industry needs and delivery feasibility.
- The credit vs hours approach is more suitable for a full program rather than short courses.

8. Block Course delivery

- The document does not provide guidance on block course delivery as part of enrolments in a training programme, despite its effectiveness as a widely used training method. Block

courses offer immersive, intensive learning, often more effective than the short course format.

9. Training Costs and Industry Impact

- There is potential for increased training costs, including wage costs for attending training. Costs may double due to extended course durations.
- Additional time required for courses will add significant cost burdens to both training providers and industry participants.
- Any increase in training duration and cost may impact industry participation and compliance.

10. Implementation and Transition to Skill Standards

- A two-stage approach to implementation should be considered, allowing for more time for industry-wide consultation and refinement.
- The transition from unit standards to skill standards needs further consideration, with clear communication on what will change.
- As crane qualifications transition to skill standards, the guidance should be future focused to align with upcoming industry expectations and regulatory changes.

11. Quality Assurance

- Need to focus on ensuring quality delivery using the current mechanisms rather than changing the system. Includes moderation, fit-for-purpose qualifications, quality training materials, robust industry guidance on delivery expectations, and punitive measures for providers who fail to meet the NZQA's established standards.
- Need to consider moderation practices to ensure compliance with standard outcomes and ensuring assessments are fit for purpose.

12. Risks

- There is a risk of industry moving away from using standards if the courses become too long and the cost of training rises. Will increasing the delivery and assessment timeframes increase safety.
- Due to the current VET Reform there is a risk that the WDCs will be unable to successfully implement the guidelines and quality assure providers against the guidelines.
- There is a risk for learners and providers where the standards are embedded into programmes of study. There needs to be time to work through these issues to ensure learners can still access the training early in their programme.

- There are potential barriers for small businesses if assessment is moved away from short courses.

Recommendations

The following recommendations have been provided through the consultation process. These need to be considered as part of the process.

1. Allow the use of simulated environments where necessary to ensure learner safety and competency development.
2. Provide clear guidelines on pre-requisite requirements and consider flexibility in assessment sequencing.
3. Conduct a comprehensive review of standard levels and credits to ensure alignment with learning objectives and industry needs.
4. Develop clear training programs and guidance for verifiers, particularly to support small businesses in compliance and staff development.
5. Provide flexibility in assessment requirements for learners with limited or irregular access to machinery and integrate alternative ways to verify competency, such as recognition of experience and prior learning.
6. Shift the focus towards improving training quality rather than rigidly aligning credit values with notional hours, ensuring industry relevance and practicality.
7. Conduct a cost-benefit analysis to ensure training requirements remain financially feasible while maintaining competency standards.
8. Develop a phased implementation plan to support a smooth transition to skill standards while ensuring industry readiness.
9. Remove multiple standard combinations for courses and introduce clear facility guidelines for training providers.
10. Stop the use of advanced training for inexperienced learners through the secondary schools, including gateway.
11. Remove generic health and safety requirements from standards to avoid duplication and adopt a competency-based approach.
12. Provide learners with more support for ESOL, literacy, and numeracy through the use of multi-lingual resources and a focus on practical assessment for theoretical knowledge.
13. Provide clear guidance on structuring block courses while ensuring competency-based outcomes and adapt delivery structures to fit different unit standards and industry needs.