



Submission to the Independent Taskforce on Workplace Health & Safety

November 2012

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Introduction

Please accept this submission from the New Zealand Industry Training Organisation (NZITO) into the Independent Taskforce on Workplace Health & Safety's (the Taskforce) consultation process. We make this submission around some macro level processes and changes occurring across industry training and concerning NZITO, before providing some direct feedback into some of the specific points around the capacity and capability as outlined in the consultation document

NZITO is the standard setting body (SSB) for Occupational Health & Safety (OHS) on the New Zealand Qualifications Framework (NZQF)¹ as administered by the New Zealand Qualifications Authority (NZQA). In this role NZITO set standards and develop qualifications on the NZQF from levels one to six. NZITO is also the gazetted industry training organisation for the meat processing, dairy manufacturing, seafood, and leather manufacturing industries.

As the SSB for OHS we are the lead organisation in the Targeted Review of Qualifications (TRoQ) and are currently coordinating a review of all OSH qualifications listed on the NZQF (levels 1-6). This process will result in a reconfiguration of OHS qualifications through a collaborative approach to qualification development, close stakeholder involvement and agreement on qualification structures, educational pathways and clear occupational outcomes. Rationalisation of the current qualifications listed on the NZQF, is to remove duplication, provide clarity about purpose, and ensure that qualifications have outcomes that can be easily understood by parents, and are meaningful to trainees, students, and employers. Post-TRoQ qualifications are also meant to be delivered in any setting so that training can be provided in workplace or institutional learning environments, or indeed a blend of both. This of course will be limited by the impractical nature of some learning outcomes that cannot be delivered in one setting or another. We will comment on this last point in more detail later in this submission.

Alongside the TRoQ there are some other major changes that have either been implemented or are imminent, which could have an impact on OHS training or the form and shape of ITOs and vocational education and training in New Zealand. Some implemented change has already impacted on OHS training with the prohibition of government funding support for some OHS training through the Industry Training Fund. There are other changes in the foreseeable future that will potentially influence the delivery of OHS training to standards, NZITO's role and ability to function as the OHS SSB, and the shape of industry training given the Ministerial review and merger processes that have been signalled, with the latter already underway.

We also note that training is a fundamental component of safe workplaces and that continued governmental support for this is critical.

¹ Formerly known as the National Qualifications Framework (NQF)

NZQA based OHS training

The appended charts (see Appendix One) show the uptake of H&S qualifications on NZQA, and those which NZITO records on its database which may or may not be visible through NZQA. Another consideration is that the consultation document (para. 175) understates the number of specific OHS qualifications on the framework listing five instead of the eleven that are currently under review through the TRoQ process.

These eleven qualifications are listed in table one below;

Table 1: NZQF OHS Specific Qualifications

Qualification Owner	Title	Level	Credits
NZITO	National Certificate in Occupational Health and Safety (Workplace Safety)	1	40
Unitec	Certificate in Construction Site Safety	3	40
Wairiki Institute of Technology	Certificate in Occupational Health and Safety	3	60
Infratrain	National Certificate in Civil Infrastructure, Health, Safety, and Environment (Operations)	3	54
NZITO	National Certificate in Occupational Health and Safety (Workplace Safety)	3	53
BCITO	National Certificate in Construction Health and Safety, and Injury Prevention with strands in On Site Theory, On Site Practice, and On Site Management	4	50-53
Infratrain	National Certificate in Civil Infrastructure Health, Safety, and Environment (Supervision)	4	66
Aoraki Polytechnic	Certificate in Occupational Health, Safety, and Legislative Compliance	4	120
NZITO	National Certificate in Occupational Health and Safety (Co-ordination)	4	65
Southern Institute of Technology	Diploma in Occupational Health and Safety	6	120
NZIM	NZIM Diploma in Health & Safety Management	6	120

Qualification usage figures obtained from NZQA also obscure the use of limited credit programmes (LCPs), which have been utilised in large numbers over the past few years. The volume of H&S training when examining those 'official' statistics understates training, especially in workplaces, as it is ITOs who are the Tertiary Education Organisation (TEOs) who arrange these being delivered. LCPs are delivered on the pretext of the trainee

continuing on to a full qualification. Given the number of LCP completions versus full qualifications completions (see Appendix One: figures 2 and 3) it is apparent that LCPs have been utilised by employers for short course type training and not as the intended precursor to gaining a full qualification. This has served a purpose as they are shorter in duration and therefore more easily manageable programmes for workers to complete.

There are also technical qualifications that have had a health and safety focus or strand which are also not included in the statistics – one example of this would be the Introduction to Meat Processing (Workplace Health and Safety) qualification which has also been offered as an LCP (see figures 4 and 5)

We would recommend that the Taskforce request similar information from all Industry Training Organisations and all other TEOs to best gauge the volume of OHS training provided over a given period.

Macro level processes

Targeted Review of Qualifications

The OHS TRoQ has been underway for the past 16 months and the application for approval to develop the revised qualifications has just been returned from NZQA requesting more information. As mentioned earlier the review contains clear objectives in reducing the proliferation and duplication of listed qualifications and to also bring all level one to six on the NZQF into alignment whether they are national qualifications, such as those offered through ITOs; or local qualifications, such as those being offered by specific TEOs such as Institutes of Technology or Polytechnic (ITPs) and Private Training Establishments (PTEs); both of which require NZQA registration and are therefore bound by NZQA quality assurance and evaluation requirements.

This process involved the establishment of a governance group to oversee the qualification development, which was comprised of the current 'owners' of qualifications whether they were national or local. The group undertook a range of surveys which were distributed widely and received a significant amount of feedback into the purpose, content and structure of the newly proposed qualifications. Key stakeholders were invited to comment, which included other ITOs, ITPs, peak OHS organisations, consultants, employers, and employees.

These consultations garnered much information that permitted the construction of broad graduate profiles outlining strategic purpose statements, key outcomes, educational pathways and occupational outcomes. These went through several iterations before the governance group deemed them suitable for submission to NZQA. This process was interesting and NZITO hold the belief that NZQA's rules and regulations for the qualification reviews have been unclear, at times contradictory, and have permitted undue influence from current qualification owners. This has resulted in the dilution of some of the proposed qualifications. An example of this is the proposed level three certificate. This was originally proposed with the title, *New Zealand Certificate in Health and Safety Practice (Level 3)*. However the practical aspects of the qualification could have excluded some students in institutional learning environments as they may not be in employment and adequately able to contextualise their learning with practice.

Copies of the latest iteration of these are included in appendix two.

Feedback received from NZQA on 8 November 2012 regarding the application to develop the qualifications has indicated that there is wider stakeholder engagement required to support the proposals. As this would require further consultation NZITO are considering approaching NZQA to postpone the next phase of this project until the recommendations of the taskforce are available.

OHS SSB Role

In July this year NZITO signalled to NZQA our intention to withdraw from the OHS SSB role. This is not a decision the organisation took lightly. With previous policy setting changes the organisation was burdened with this role without sufficient funding to manage the role at an acceptable level. Indeed in NZQA's five yearly Eternal Evaluation and Review (EER) of NZITO's educational performance and self-review processes in May 2012 noted that the volume of OHS moderation was problematic and indeed ineffective;

... the focus of external moderation remains on seeking improved rates of compliance in a very large number of unit standard assessments at low New Zealand Qualification Framework (NZQF) levels offered by hundreds of providers in the occupational health and safety subfield, and is not currently effective²

In addition, NZITO has the responsibility to manage the external moderation of standards within its standard-setting body coverage, which involves mainly level 1 and 2 standards in the occupational safety and health subfield, for which there were 464 providers in 2011 actively assessing these standards. Persistent non-compliance by providers in this area suggests to the evaluation team that NZITO, in conjunction with NZQA, needs to review this system and develop a more effective system for managing moderation in this area of provision.³

In dealing with a large number of providers of OHS training and with limited funding available through the NZQA rebate, NZITO's ability to manage this role to the required standard is a difficult task. The rebate includes the cost of conducting the review of qualifications, including significant direct costs to the business.

We have recently re-engaged with NZQA about retaining the SSB role if appropriately funded so standards can be maintained at acceptable levels.

ITO mergers

Government have also been driving mergers of ITOs that may have some effect on NZITO's continuation of the SSB role. NZITO are part of the wider primary sector of ITOs which was comprised of seven ITO, but due to mergers through 2012, now comprises of three ITO: NZITO (meat processing, dairy manufacturing, seafood) , Primary ITO (Agriculture, Horticulture, Sports Turf, Equine), and FITEC (Forestry, Pulp & Paper, Wood products, and Furniture manufacturing).

The industries covered by this cluster of ITO include the three most higher risk industries of fishing, forestry, meat processing and farming. There is interest in the future merged entity retaining the SSB role as increased scale will help offset the high cost of providing a generic service to such a wide audience. This will be unknown until we receive a reply from NZQA about appropriately funding the role; and for the future merged entity to accept any such arrangements and responsibilities.

² NZQA, (2012) EER report, page 9.

³ NZQA, (2012) EER report p.16

Compliance prohibition

In 2011 the Tertiary Education Commission placed a prohibition on what they termed 'compliance' LCPs. These programmes were generally worth 20 credits (which equates to 200 notional hours of learning) and had been arranged by NZITO across a wide range of industries, including some outside of its gazetted coverage. These programme statistics are not captured by NZQA as the unit standards achieved are recorded but the programme completion is not. Therefore any NZQA data must be tempered with information about these LCPs, as noted in the first section and illustrated by the charts in Appendix One. The rationale behind this prohibition was that OHS training such as this was the responsibility of the employer, and therefore should not attract government funding through the industry training fund.

This prohibition was aimed at very short and often repeated courses SAC (Student component) funded courses in the main but also effected OHS programs run under the more modest ITO funding run by the TEC.

This prohibition has led to a large decline in OHS training being arranged through ITOs to national standards and could create a situation where non-NZQA based providers are delivering training to companies without the safety net of being externally moderated through NZQA or international organisations such as NEBOSH.

Industry Training Review

The Ministerial review of industry training will also potentially impact upon the delivery of workplace training in several areas.

The most recent consultation paper proposed options for feedback implied that there would be higher rates of funding for off-job or provider based training and possibly lower rates of funding for on-job or workplace training. This could potentially lead to a reduction in workplace learning and take away some of the contextual learning that is critical to OHS training. Whilst off-job training will provide better theoretical knowledge we believe that the removal of some contextualised learning could have a negative impact on health and safety in New Zealand workplaces.

Another proposal in the review was around unit standards becoming the currency for all vocational education and training. This may create some issues for providers who teach off-job courses on a topic basis. Managing consistency to such standards would however ensure a common national approach to OHS training would provide clarity around national standards. Therefore NZITO supported the unit standard currency proposal.

ITOs also currently have a legislated leadership role under the *Industry Training Act* for their gazetted sectors. This leadership role is likely to be withdrawn from ITOs which does not create any issues for NZITO and its meat, dairy and seafood sectors as we work closely with these industries. However, there should be questions raised about who is leading the OHS industry and providing strategic direction and determining skill needs. Perhaps this responsibility should lie with the regulator.

Specific consultation feedback

This feedback is provided in relation to the specific paragraph references from the consultation document focusing on the section entitled 'Capacity and Capability of Workplace Health and Safety System'.

Paragraph 174

We agree that language, literacy and numeracy are barriers to effective training. TEC's drive to embed literacy and numeracy in industry training has omitted the language component for people who speak other languages. The report touches on this point by referencing Pacific workers and with the exclusion of the language component from embedded programmes NZ Inc. is missing an opportunity to improve workplace health and safety. NZITOs initial analysis of embedded literacy and numeracy (ELN) assessments using the national Literacy and Numeracy for Adults Assessment tool (LNAAT) highlighted literacy levels of people whose first language is not English as being the major determinant in achieving a lower level score in the learning progressions on the LNAAT. This exclusion of language is concerning as we have a proportion of migrant workers from non-English speaking backgrounds across our industries and the ELN programmes may be insufficient for these trainees to make the required gains in their English language literacy. This is an issue that is possibly wider than training and may need to be addressed through increased support of migrants. We do note that OHS training has been developed to utilise symbols and practical methods that mitigate literacy and numeracy deficits in some cases.. None the less risk is increased where literacy numeracy or language barriers can create errors.

Paragraph 176

As noted earlier the provision of NZQA based training will be focused on employment outcomes so this will be restricted to staff with specified health and safety roles. This may prohibit OHS training for those not in specified OHS roles.

Paragraph 178

For those staff not in specified OHS roles we would recommend that OHS is embedded in all technical qualifications to ensure that this is treated as business as usual rather than as an additional compliance activity/burden. This will enable continued government support through the Industry Training Fund; and ensure the continuation of industry contextualised qualification based learning.

Paragraph 179

The proposed level four certificate and level six diploma would provide a framework for supervisory and management training. Whilst there are options currently available the education pathways may not be apparent, nor the training opportunities within the reach of many who are already in employment. There may be a need for more flexible workplace based arrangements of such training to make this attainable. For example to safety representatives and committees or other groups involved in self-managed safety initiatives.

Paragraph 184

Through the TRoQ process it became apparent that the lack of professional registration of OHS practitioners is an issue for professional associations and is needing resolution at a national level. OHS associations and peak bodies will need to agree on the required standards. This has been accommodated in the proposed TRoQ qualification structures by providing a clear educational pathway up to diploma level with this possibly affording the qualification basis for candidates to then seek professional registration through the appropriate body. We would not recommend that everyone already in OHS roles complete the proposed education pathway from the beginning as this would result in a poor investment and over training. A process of recognition of Current Competency, or Recognition of Prior Learning could be applied to the large number of experienced health and safety professionals already working in New Zealand who may not hold a formal New Zealand qualification.

Paragraph 185

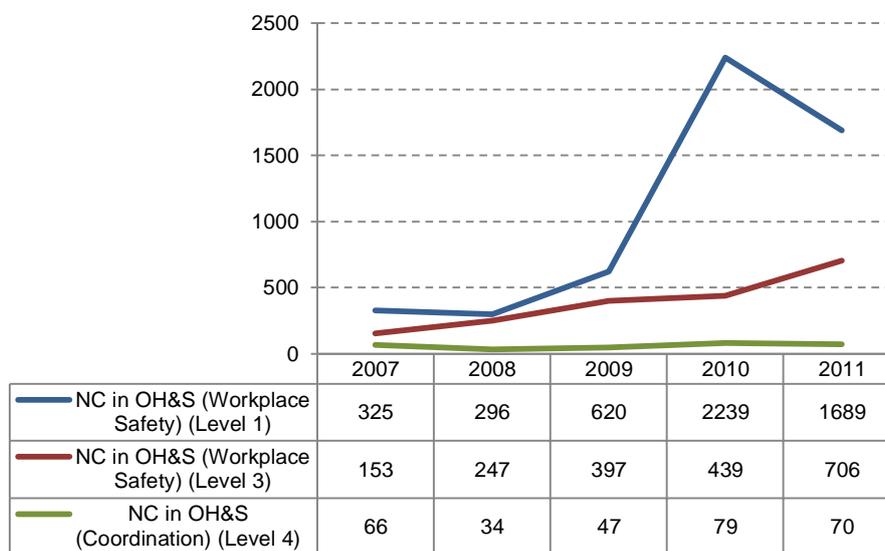
A professional registration process would ensure that consultants are 'suitably qualified people'.

There is still an important place for ensuring all parties are aware and motivated to manage risk and raise standards so awareness and training should be broadly made available.

Appendix I: Qualification/Programme completions

The figures presented in this section include completions for OHS qualifications under NZITO SSB role that have been delivered across all TEOs; specific OSH programme completions for NCs, LCPs, and SCPs as arranged by NZITO; and technical programmes that have OHS strands arranged by NZITO. All of these will cover each year during the period 2007 to 2011. Different versions of the qualifications or programmes are not represented below.

Figure 1: OHS qualification completions (2007-2011) – All TEOs⁴



Illustrated above are the OHS specific qualification completions for the period that were awarded by all TEOs using NZITO qualifications.

⁴ Source: NZQA qualifications awarded data.

Figure 2: OHS qualification completions (2007-2011) – NZITO⁵

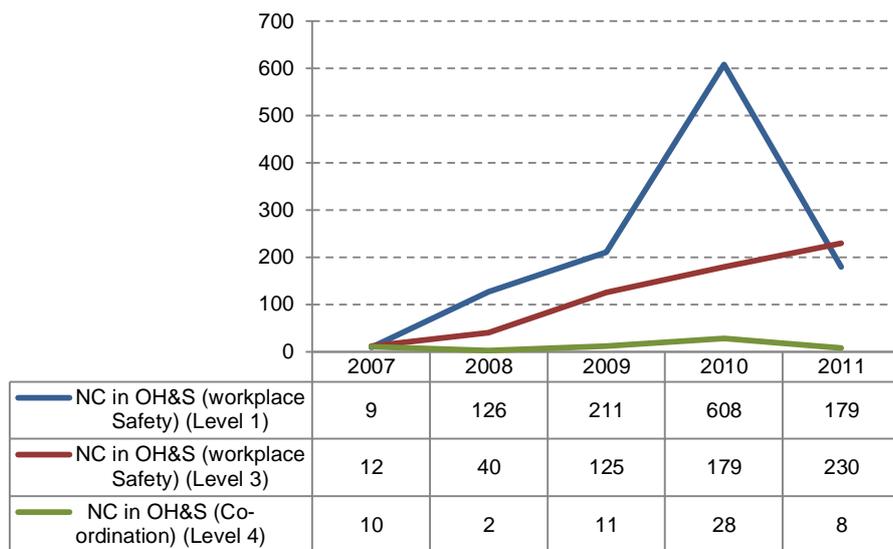
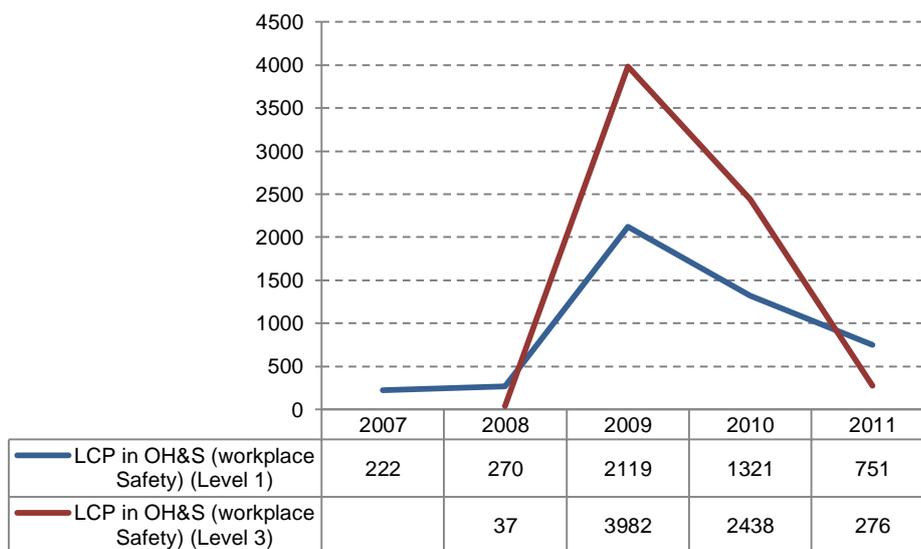


Figure 3: OHS LCP completions (2007-2011) – NZITO⁶



⁵ Source: NZITO database

⁶ Source: NZITO database

Figure 4: Technical Qualifications with OHS Strands (2007-2011) - NZITO

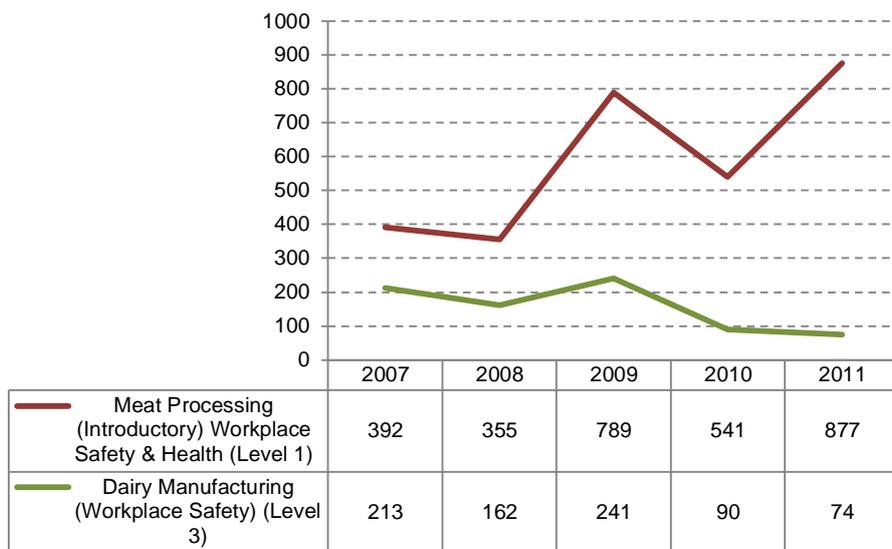
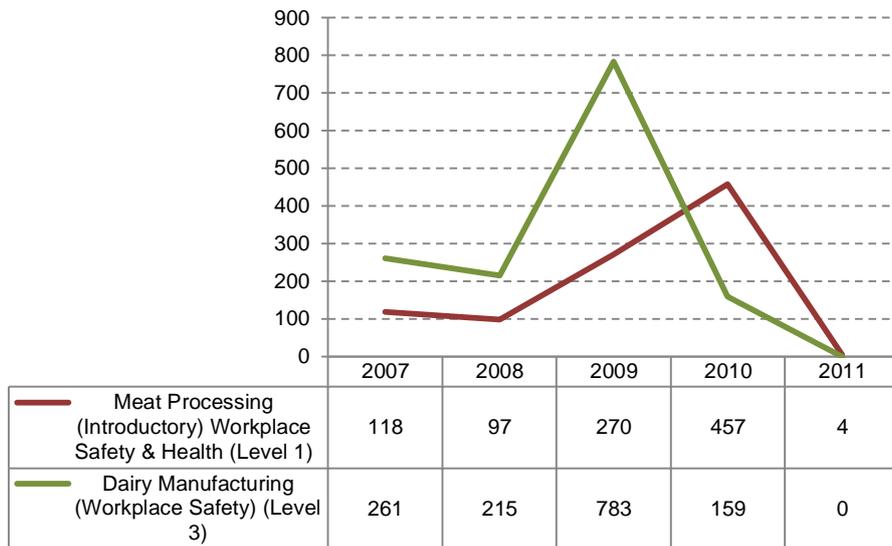


Figure 5: Technical LCPs with OHS Strands (2007-2011) - NZITO



Appendix II: Proposed Graduate Profiles

New Zealand Certificate in Occupational Health and Safety (Level 3)

Strategic Purpose Statement

This is the introductory qualification for people proposing to specialise in occupational health and safety. Graduates of this qualification will have some oversight of health and safety within an organisation and be able to work with limited supervision in any environment. Entry for this qualification is open.

Graduates of this qualification may progress to:

- New Zealand Certificate in Occupational Health and Safety Practice (Level 4)

Graduates of this qualification may be qualified to work in an occupational health and safety role and have some responsibility for health and safety in a workplace.

Graduate Profile

Graduates of this qualification will be able to:

- Apply safe work practices to job roles in an organisation
- Demonstrate knowledge of environmental, legislative and organisational health and safety requirements for an organisation
- Complete incident and accident reports.
- Present oral and written reports and communicate workplace health and safety requirements to other staff in their work area
- Participate in hazard analyses.
- Apply health and safety requirements to a range of technical skills related to specific job roles.

Graduate Profile Outcomes (Total 40 credits)

- Apply safe work practices to job roles in an organisation. (5 credits)
- Demonstrate knowledge of environmental, legislative and organisational health and safety requirements for an organisation. (5 credits)
- Complete incident and accident reports. (5 credits)
- Present oral and written reports and communicate workplace health and safety requirements to other staff in their work area. (5 credits)
- Participate in hazard analyses. (5 credits)
- Apply health and safety requirements to a range of technical skills related to specific job roles. (15 credits)

New Zealand Certificate in Occupational Health and Safety Practice (Level 4)

Strategic Purpose Statement

This qualification is for people who have attained sufficient knowledge and practical skills to coordinate or manage a health and safety role and promote safety in their workplace whilst role-modelling safe work behaviours.

Graduates will be able to work as health and safety practitioners in conjunction with their technical specialisation.

Graduates of this qualification may progress to:

- New Zealand Diploma in Occupational Health and Safety Management (Level 6).

Graduates of this qualification may be qualified to work as health and safety coordinators, line managers, team leaders, supervisors, occupational nurses or operational managers who hold line management responsibilities for health and safety.

Graduate Profile

Graduates of this qualification will be able to:

- Apply environmental, legislative and organisational health and safety requirements to work practices and procedures.
- Role model and support safe work behaviour.
- Conduct health and safety hazard analyses.
- Control and monitor hazardous environments.
- Demonstrate knowledge of contractor management relating to occupational health and safety.
- Communicate workplace health and safety requirements to internal and external clients.
- Apply health and safety requirements to a range of technical skills related to specific job roles.

Graduate Profile Outcomes (Total 65 credits)

- Apply environmental, legislative and organisational health and safety requirements to work practices and procedures. (10 credits)
- Role model and support safe work behaviour. (5 credits)
- Conduct health and safety hazard analyses. (10 credits)
- Control and monitor hazardous environments. (10 credits)
- Demonstrate knowledge of contractor management relating to occupational health and safety. (5 credits)
- Communicate workplace health and safety requirements to internal and external clients. (5 credits)
- Apply health and safety requirements to a range of technical skills related to specific job roles. (20 credits)

New Zealand Diploma in Occupational Health and Safety Management (Level 6)

Strategic Purpose Statement

This qualification is for people to become capable of operating as a health and safety manager or external consultant responsible for providing leadership and direction in health and safety management.

Graduates of this qualification may be qualified to work as safety managers, occupational health and safety advisors, risk management consultants, occupational health and safety consultants, occupational health and safety nurse specialists, or senior managers who are responsible for health and safety in their workplace at a specialist or management level.

This qualification could lead on from the New Zealand Certificate in Occupational Health and Safety Practice (Level 4)

Graduate Profile

Graduates of this qualification will be able to:

- Promote excellence in health and safety management and develop a positive organisational safety culture.
- Implement a health and safety strategy in the workplace.
- Perform the health and safety management function within an organisation.
- Notify, report, and investigate incidents and accidents.
- Identify hazards, assess risks, introduce and monitor controls.
- Review and evaluate health and safety policy management systems.
- Design and implement emergency procedures.
- Evaluate organisational health and safety performance.
- Conduct a consultation on health and safety issues.
- Demonstrate knowledge of workplace ergonomic and occupational hygiene requirements.
- Conduct, analyse and report on health and safety training.
- Manage health and safety contractors.

Graduate Profile Outcomes (Total 120 credits)

- Promote excellence in health and safety management and develop a positive organisational safety culture. (10 credits)
- Implement a health and safety strategy in the workplace. (20 credits)
- Perform the health and safety management function within an organisation. (10 credits)
- Notify, report, and investigate incidents and accidents.(5 credits)
- Identify hazards, assess risks, introduce and monitor controls. (20 credits)
- Review and evaluate health and safety policy management systems. (20 credits)
- Design and implement emergency procedures. (5 credits)
- Evaluate organisational health and safety performance. (10 credits)
- Conduct a consultation on health and safety issues. (10 credits)
- Demonstrate knowledge of workplace ergonomic and occupational hygiene requirements. (10 credits)
- Conduct, analyse and report on health and safety training. (10 credits)
- Manage health and safety contractors. (10 credits)