

## **NZUSA Submission on the Draft Tertiary Education Strategy**

### **Introduction**

Tertiary education is integral to New Zealand's future; it provides opportunity and can be used to enhance equity. It is this value set that should be at the core of any government's Tertiary Strategy. Outcomes from tertiary education can also fuel economic development, improve productivity and ensure that there are high skilled jobs, and graduates to fill those jobs, so it is good that there is attention to this in the Strategy, although the balance between these outcomes and the core values is not as evident as it needs to be.

With the right systems in place, tertiary education can provide individuals with the ability to create their own pathways out of poverty and, in doing so create a fairer and more equal New Zealand. Such systems also mean that the benefits of tertiary education are genuinely available to all those with the drive and aptitude to succeed, not limited by their means, ensuring that the best potential of all is realised.

Further and higher education is central to achieving key objectives. These include:

- A fairer New Zealand—all New Zealanders will benefit from widespread equitable access to a diverse tertiary education sector that allows each individual to develop and reach their potential. Society as a whole will benefit, for instance, from the widespread application of post-graduate research.
- A New Zealand that is stronger economically—boosting New Zealand's share of high skilled jobs and ensuring continual productivity growth will require a highly skilled workforce that can rapidly adapt to meet future challenges.
- Future challenges—acting now to lay down a long-term reform agenda for higher education will position New Zealand to deal with future challenges and take advantage of the new jobs and other opportunities that will emerge in the years ahead.

New Zealand's goal should be to be amongst the most highly educated and skilled citizens on earth, and in the top group of OECD nations for cutting-edge research and the transfer of knowledge from that research.

These issues of access and opportunity, affordability and the use of education to create a fairer and more equal New Zealand are missing from the Draft Tertiary Education Strategy. Instead it focuses too intently on the idea that tertiary education is primarily for connecting learners to the world of work, and that research is to be directed at improving business outcomes.

It is undeniable that forming productive links between tertiary education and industrial partners is an important focal point in preparing our graduates for the 21<sup>st</sup> century. However, if the Tertiary Education Strategy leans too heavily upon the language of economic development then we run the risk of creating a disconnect between the purpose of the document and the significant portion of the New Zealand population who believe that tertiary education and research at our tertiary institutions exist primarily to make a contribution to all social life, rather than ensuring a private profit – be it for business owner or the individual student. These ideas are not mutually exclusive, and drafting a document which implies that they are fails to live up to its own intention of providing a clear direction for the tertiary sector which any professional, academic, student or citizen can buy into.

### **The State of Tertiary Education in New Zealand**

We are concerned about the selectivity and errors in the material that was presented as outlining the state of tertiary education.

#### **The Cost of Student Loans**

The pie graph representing as expenditure of \$760 million as the “annual cost of student loans” does not make it clear if this is the amount lent less the amount repaid (\$710 million in 2011/2012 – the most recent figure available to us) or the “initial write-down” of the total amount lent (\$1.586 billion). It is worth noting that most of this is then paid to tertiary institutions, with another significant amount used by students to meet living expenses in the absence of direct government support.

The figure is presented as “the annual cost of student loans”. In fact, the annual net expense of the Student Loan Scheme in 2012 was negative \$122 million, being the combination of the interest unwind as money is repaid and the revaluation of the loan book to take into account policy changes (such as the increase in the repayment rate, and some accounting changes). This exceeds the cost of the initial write-down.

This surplus in the student loan “costs” not only occurs in 2011/12 but is also predicted to continue to occur for at least the next five years.

#### **Selectivity in data presented**

It is disappointing that in a document that is focused on tertiary education as something that aids employment outcomes that there was not data presented on the poor returns that the New Zealand labour market offers currently for graduates.

In 2011, a tertiary-educated worker in New Zealand could expect to earn 18% more than a worker with an upper secondary education, less than a third of the OECD average of 57%. In fact New Zealand returns to private expenditure on tertiary education are amongst the lowest in the world. As is well known, they also differ significantly based on gender and ethnicity.

Further, we know that a considerable amount of the private returns to tertiary education can actually be explained by or pre-existing social conditions and individual capabilities. Education certainly has an impact on employment outcomes but the fact that people who are pre-disposed to doing well in compulsory and higher education also earn higher wages overstate the returns on tertiary education.

There has also been inadequate research into the social and public benefits of tertiary education, despite that Treasury's work on identifying private returns was supposed to be in parallel with work identifying social or public returns.

Annual expenditure per tertiary student in New Zealand is USD\$10,418 (including research and development activities). This is significantly less than the average across OECD countries of USD\$13,528. At 34%, the proportion of tertiary spending that comes from private sources is above the OECD average. This means that New Zealand students pay more than the average, for less than the average in terms of resources during their study, and get a worse return than the average in terms of private returns.

In addition, while New Zealand's graduation rates appear good and have been improving, they are artificially inflated by the high graduation rate of international tertiary students. For example, when international students are excluded from consideration, first-time tertiary-type A graduation rates for New Zealand drop by 10 percentage points, and first-time tertiary-type B graduation rates drop by 8 percentage points.

### **What New Zealand Needs from Tertiary Education**

From our work with students on why they engage in tertiary education it is clear that they see employment outcomes as part of the matrix of inputs into their decision-making processes. However, a study that we carried out in October 2013, mirroring the results of the baseline research involved in the NZ Universities Graduate Longitudinal Study, shows that most students study what they do because it is an area of interest for them. They are completing themselves as learners and citizens, rather than simply as future employees.

Accordingly, the focus on aligning tertiary education towards being "part of the wider New Zealand economy" will necessarily reduce the scope of students' preferences and choices, as well as potentially undermine the international standing of our universities,

given the global consideration given to issues of academic freedom and institutional autonomy.

### **Build international relationships that contribute to improved competitiveness**

We agree on the goal of building international linkages for our tertiary education system. However, the material in the Strategy is entirely focused on developing export education and increasing the income from international students coming to New Zealand.

There has been good work in this space, most noticeably the publication *Seriously Asia* which was produced for the Asia New Zealand Foundation. Its recommendations should be incorporated into the Strategy.

New Zealand institutions are often challenged when they travel to Asia to recruit students why they do so little on a reciprocal basis; that is the number of New Zealanders studying in Asia, or even studying Asian languages, is very poor. Additionally, there is insufficient introduction to understanding Asia, or the world, integrated into the New Zealand tertiary curriculum.

This is not new, and it remains frustrating that nothing has been done about it. It is now even more urgent, given New Zealand faces the real risk of falling far behind in its internationalisation activities, as the new Australian government launches its “reverse Colombo Plan”.

We should look to match Australia’s initiative. Properly funded, the introduction of a large-scale short-term mobility element would maximise student exposure to Asia - and potentially generate demand for the longer study programmes and internships.

Students will need to be prepared for study in Asia. The soft-diplomacy benefits of the scheme will be jeopardised if students do not have language skills and lack cultural training. Language and intercultural awareness are even more important for internships. Language courses in New Zealand need a funding boost, as has been identified every time there has been a review of cost categories, and should be recognised as a critical priority.

It is possible to shift from the smattering of Asia study options available to a more universal scheme but only if all facets of that shift are acknowledged and funded. Student and staff travel, academic and pastoral support, programme development and quality assurance will all need to be fully funded.

### **Support business and innovation through development of relevant skills and research**

We agree that TEOs need to develop skills and knowledge for innovation, and agree with the mention, elsewhere, that the core higher-level skills of the capacity to process information, and think critically and logically, are central to this.

We believe though that increased expectation on TEOs and industry working more closely may undermine this objective. When TEOs are told to align their outcomes with the needs of industry they tend to focus on a belief that industry wants specific skills. Yet, from our engagement in employment/tertiary hui, industry see that transferable (or “soft”) skills and life-experience are missing. This focus needs to be clear that it is on transferable skills and the skills needed to future-proof the student or the industry in a climate of constant change

The real issue is that industry fails to clearly outline the skill-needs of the discipline and the tertiary sector fails to provide the appropriate modes of input into curriculum design. We have identified below that a useful contribution to this space could be made through a re-working of the processes for developing graduate profiles.

There is also a risk in ignoring community input and staff/student input into these processes because they aren’t listed as priority areas of partnership.

### **Improve outcomes for all**

At present the Strategy talks about “improving outcomes for all” but only has a focus on outcomes for Māori and Pasifika, especially in the target group of 18-24 year-olds. All institutions with equity plans have a wider focus than this, for example student with disabilities, students from lower socio-economic areas, first in family, students from refugee backgrounds, women in many areas where they are unrepresented, etc. However, at a time when resources are constrained, the focus naturally shifts to the areas where the policing takes place.

We are concerned about the setting of narrow goals, both because of the transaction and compliance costs of micro-management and, if these are high-stakes goals, they tend to result in institutional “gaming” with perverse outcomes. In the current target areas we have seen, for example, that institutions target and compete for those Māori and Pasifika who are not disadvantaged, as they are easy to work with to achieve the outcomes desired, and those who are the reason for the targeting – low socio-economic, first in family, etc – are excluded from such opportunity or ghettoised in lower-level qualifications.

Yet the enhancement possible from a broader focus than the current focus can be significant. The TEU’s *Te Kaupapa Whaioranga* has one such example:

We had one family on the East Coast where one member of the family enrolled in a REAP programme and that led to three generations of the family participating in adult education. Four of the five family members have now graduated and developed a love of learning. The grandfather, three daughters, one son and one mokopuna, all participating in tertiary education through wānanga.

The narrower focus taken in the Strategy, coupled with cuts to access to allowances for older New Zealanders, mean that such transformational stories are less likely.

We are particularly concerned about the absence of the identification of students with disabilities in the document. This is a group that has been considerably disadvantaged by changes that tighten the requirements to complete in a designated timeframe, and from an approach to support that is not focused on individual needs. We have specific recommendations in this area:

1. The Tertiary Education Strategy should be broadened beyond younger learners and into lifelong learning.
2. There should be an inquiry into the pathways from poverty that tertiary education should offer to ensure that the correct mix of policies and opportunity are in place.
3. There should be a comprehensive update of Kia Orite supported by the Tertiary Education Commission and the Office for Disability Issues.
4. Funding for support services for students with disabilities continue to be ring-fenced but be doubled, and that they be recognised as core academic services and therefore excluded from the Compulsory Student Services Fee process. Institutions should be required to return monies not appropriately expended, and students with disabilities themselves and their students' association involved in this assessment and decisions around allocation of funding.
5. The Ministry of Education's work on Special Admission be reprioritised and resourced accordingly.

We also attach a letter of support from the Emerge Trust with respect to students with disabilities.

Our preference would be for all institutions to have equity plans that take into account the communities that they serve, and that are developed through robust and democratic procedures, and to which they are held accountable by the Tertiary Education Commission. Failing that, we would like to see the inclusion of students with disabilities, students from lower socio-economic backgrounds and students from refugee backgrounds, in that order of priority.

### **Continue to improve the quality and relevance of tertiary education and research**

It is undeniable that the quality and relevance of delivery and research in New Zealand's Tertiary Institutions is of high priority in both adequately equipping graduates with the knowledge and skills to effectively engage in the economies of the 21st century, and in fostering empathic extension in order to maintain a sense of cultural identity and belonging.

We feel, however that "strengthening research based institutions" doesn't sufficiently articulate the type of improvement or, perhaps more accurately, the scope of change which will be necessary to ensure the ongoing relevance of research.

Internationally and within New Zealand, both publishing avenues and dissemination of funding operate on narrow lines.

Ian Goldin, director of Oxford University's Martin School said to the Financial Times regarding the need to break down academic silos:

Academic journals are largely specialised rather than interdisciplinary and official funding bodies shy away from interdisciplinary projects. The result is that academics with interdisciplinary interests have few ways to fund the research and few credible outlets for publishing the results.

In the same article, Tim Harford comments:

One reason the financial sector grew so grotesquely vulnerable just before the [global financial] crisis was that the knowledge required to spot trouble brewing was distributed across different kinds of people – accountants, psychologists, economists, lawyers, politicians, practitioners and others – who had no reason to talk to each other.

Discussing the construction of the 'Jeopardy' computer, IBM staff researcher, Dr David Ferrucci said:

Scientists, by their nature, can be solitary creatures conditioned to work and publish independently to build their reputations. While collaboration drives just about all scientific research, the idea of "publishing or perishing" under one's own name is alive and well.

So it is that even where this issue is structurally addressed, there is both a longstanding culturally ingrained conception of purpose and the force of academic habit that need to be overcome, which are equally difficult to contend with.

The question we need to ask is how we can expect to collaborate intellectually, when academically we are most often encouraging our brightest thinkers to focus on fractally exploring only their own fields.

If we plan to approach social and economic issues constructively, and if we wish to construct enduring solutions to the wicked social problems we are squaring up against, then a research culture which places a greater value on interdisciplinary collaboration will be essential. It's not enough to strengthen the current research based institutions, when a thorough reconceptualization of funding programmes and dissemination lines is required.

### **Strategic Priorities**

We disagree that the principal benefit (or "outcome") for students from tertiary education should be a pathway to work, rewarding or otherwise. Work is ultimately only part of a human being's life. The benefit of tertiary education should be based

around the completion of a human being's potential in terms of their educational possibilities. This will most likely have positive employment outcomes, but that is only part of the purpose, and therefore the benefit, of tertiary education.

### **(1) Delivering Skills for Industry**

It is not at all clear that the miss-match presented in terms of firms wanting to hire and unemployment figures is a problem in terms of the skills sets of graduates. We know for example that some 75% of employers recruiting university graduates through Career Hub seek "a graduate" rather than one from a particular programme or even faculty.

In responding to the poor returns from tertiary education in New Zealand, Treasury identified the following possible causes:

- Lower quality or under-resourced education institutions;
- Weak matching of individual abilities and education investment;
- Weak matching of education investment and employment opportunities;
- Weak matching of education investment with capital investment; and
- Low market opportunities for generating profits to employ skilled employees.

There is also a sixth possibility; namely, that large pockets of New Zealand's business culture (in the primary sector, in the manufacturing sector, in the services sector, and in the public as well as the private sector) are not experienced at creating profits for their business where their operation is based on using skilled employees receiving a just return on their investment and in gaining those necessary skills through education and experience.

The poor wages that employers seek to pay, reinforcing the very low returns to tertiary qualifications, mean that there are no "pull-factors" drawing students into the acquiring the specific skills that employers say that they are seeking.

We believe that rather than looking at tertiary education as the cause of labour market disequilibrium, there should be more attention played to the role of employers. An important vehicle for promoting skills development and utilisation is career paths within large organisations. As employees accumulate skills through experience and on-the-job training, they are promoted along internal career paths. This means employees are rewarded for their rising skill levels and employers must find ways to utilise those rising skills productively and profitably. In New Zealand, large volumes of skilled work are now contracted out to self-employed operators, only some of whom are in sufficiently scarce supply to receive just returns and working conditions for their skills.

It is not necessary to suggest any great conspiracy among employers to accept the possibility of this hypothesis. Adam Smith, writing in his *Wealth of Nations* 235 years ago, put it this way:

Masters are always and everywhere in a sort of tacit, but constant and uniform combination, not to raise the wages of labour above their actual rate. To violate this combination is everywhere a most unpopular action, and a sort of reproach to a master among his neighbours and equals.

In other words, the tendency to underutilise and undervalue skills passes through history into current business culture.

It is possible to build a nation offering full employment with decent jobs. It needs policies that reinforce each other across the whole big picture; it needs substantial investment in developing the individual abilities of the next generation; and it requires a significant culture shift in rewarding and utilising skills in the workplace.

We agree that there should be closer links between the vocational education and training sector and industry/employers as there is little point in investment either by taxpayers or the individuals concerned, both in terms of money and time, in achieving qualifications that should lead into particular employment when there is either not that employment available, or where their qualification is not seen by industry as well preparing them for it. We note though that the vast majority of higher education qualifications are “general” in the sense that graduates move into a range of occupations, where specific skills required by their employers should be the responsibility of those employers.

We therefore support the acknowledgement in the Strategy that “one of the most crucial outcomes of study is the development of the capacity to process information, and think critically and logically. It remains true that any qualification provides important general skills as well as the knowledge specific to that qualification.”

However, we are conscious that, although considerable work goes into the setting of TEI’s Graduate Profiles, these tend to exist at the institutional level, and to not be subject to assessment or assurance. We believe that graduate profiles should exist at the programme level and that institutions should be required to demonstrate how it is that graduates from their programmes achieve outcomes referred to in their graduate profiles, and further that these are tested and reported on alongside other EPIs.

Similarly, when new courses are introduced they are required to provide an assessment as to the likely employment outcomes for those graduating from those programmes, but these too are not tested against subsequent results.

Two examples where there is currently a significant issue in employment outcomes are in nursing (or health more broadly) and in teaching. There is not, however, an issue in terms of graduates from these programmes getting jobs, just not in the area or at the level that they have trained for. It is not sufficient for there to be a claim of success that a teaching graduate simply has a job, when they trained to be, and want to be, a teacher.

Similarly nursing graduates also have good employment outcomes, though those who trained to be registered nurses are employed as enrolled nurses or even as care-givers.

These outcomes, caused by a gross over-supply of positions in tertiary institutions, are made more perverse by the fact that the government is the funder, the regulator, and the employer. Further, the government is uniquely informed as to likely demand, since the need for teaching and health care workers are so closely aligned with population trends. If there were any areas where work-force planning should be successful it is here, but the government is completely absent. It should not be simply an obligation put upon the tertiary institutions, and it cannot be solved by merely providing “information” as to graduate outcomes. We know that telling a class of intending students that only 25% of them will find work is actually ineffective at restricting demand, as all of the class will expect that they will be one of the fortunate ones.

## **(2) Getting at-risk young people into a career**

We support the goal of getting young at-risk young people into a career through harnessing the possibilities of tertiary education to transform lives. There is considerable evidence that study, particularly at degree level, offers opportunities out of poverty.

However, this should not be a preserve only of young people. For tertiary education as a path out of poverty is also true for people at all stages of life. The pathway should be available for all New Zealanders through the re-embracing of a commitment to life-long learning.

This would involve as a bare minimum:

1. The reinstatement of access to the Tertiary Incentive Allowance, or equivalent, for degree-level courses, as was recommended by the Welfare Working Group.
2. The restoration of access to 200 weeks of allowances for those aged over 45, as many of those engaging in study at this age will need transition programmes prior to their being able to undertake degree-level (usually three years on their own) study.
3. The restoration of post-graduate allowances, given that there are an increasing number of entry-level qualifications that are only offered at post-graduate level, including, potentially and has been mooted, teaching.

## **(3) Boosting achievement of Māori and Pasifika**

The focus on Māori and Pasifika access and achievement has, for some time now, been a priority area for the tertiary sector. We agree with the recent shift in perspective, from an emphasis on equal access and equal participation to a prioritisation of equal outcomes for Māori and Pasifika, and believe that this is an important distinction. The lives of our Tauria Māori, like the lives of our Pasifika students or any other students, do

not end at the moment of entry or participation in education and if we fail to take responsibility for serving our students as graduates, moving into the workforce and beyond, empowered to staircase out of poverty and to give back to their own whanau, hapu and iwi connections, then we seriously underestimate the depth of our responsibility in improving the lives of individuals, groups and society in Aotearoa, New Zealand.

Further, the monitoring of this outcome parity must be based in regionally focussed demographic monitoring, and not national averages. We support the approach laid out in Kā Hikitia. The achievement of the criteria outlined will also be highly dependent on the prevalence of Māori and Pasifika staff in tertiary institutions although this is not included as an area of consideration within the system expectations or strategic delivery components of the document.

To attract, understand and engage with Māori and Pasifika students in delivering according to TES outcomes, institutions will need to also prioritise the employment of Māori and Pasifika staff – both within the context of educational delivery and of academic and pastoral support services. If the TES doesn't set out a requirement to consider Māori and Pasifika staff recruitment strategies then we have set out a fair and reasonable expectation but have failed to equip institutions with the tools needed to successfully deliver on it.

Finally, in the context of Te Reo Māori and Mātauranga Māori research and development, it needs to be clearly stated that this will be undertaken with a regional focus, rather than a one-size-fits-all attitude. Mātauranga Māori and Te Reo Māori are fundamentally unique to regions of delivery and local tikanga must be acknowledged. If the distinctive attributes of Māori in local regions are not respected, or worse, are ignored entirely, then we completely fail to understand our treaty obligations as noted in the draft TES.

#### **(4) Improving adult literacy and numeracy**

We support the focus on improving adult numeracy and literacy. Given that these are bare minimum requirements to access further and higher education, and should have been provided in the compulsory sector, and for free, programmes at the tertiary level need to be provided for free. We agree that they need to be accompanied by supportive and flexible policy settings, taking into account the widely differing circumstances that people with these needs will find themselves in. This goal would be significantly enhanced by the restoration of cuts to Adult and Community Education that were made by the 2008-2011 National-led government.

#### **(5) Strengthening research-based institutions**

We support that there should be further strengthening of research-based institutions but this involves a thorough interrogation of existing policy settings and should not be

driven entirely by a desire to better connect those institutions with industry and on an unproven approach of picking winners. Given that large New Zealand industry currently uses the existence of research-based institutions to chronically under invest in their own research and development already, exacerbated by the removal of tax incentives, and that they are driven by incentives to prioritise short-term research over the blue sky and long-term research that actually generates the greatest returns, this could be damagingly counter-productive.

We support incentives to encourage collaboration between industry and research institutions but this cannot be at the expense of the world-leading research that is undertaken because leading researchers are pursuing inquiry based in their areas of expertise.

We believe that there also needs to be a comprehensive review of the Performance Based Research Fund, given the concerns that were not addressed in the recent review, since that explicitly accepted the key fundamentals of the current system.

We know that the compliance costs of the PBRF is already reducing the amount of research that can currently be undertaken, with involvement in producing evidence portfolios estimated at taking around one week per researcher out of their ability to engage in scholarship (teaching and research). AUT University estimated the compliance cost of the PBRF as costing it around 5% in external income and around 1% in total research output. It is also skewing research away from multi-disciplinary research, and risky research that might challenge the core beliefs of a discipline, where, ironically, the research findings might be the most transformative and beneficial.

### **(6) Growing international linkages**

As stated earlier, we agree with the goal to build international linkages for our tertiary education system. However, we reiterate that the material in the Strategy is entirely focused on developing export education and increasing the income from international students coming to New Zealand.

We should look to match Australia's "Reverse Colombo Plan" initiative.

### **System expectations**

The section that refers to the "focus on the system as a whole" itself needs a focus. What is the overall purpose of tertiary education in New Zealand and what should drive it? We recommend that New Zealand should follow the leadership of Australia, Scotland and England in declaring that the tertiary system should be student-centred and that its performance could be best enhanced by a focus on developing and incorporating the student voice into all aspects of system delivery. We have produced research to this effect, with Ako Aotearoa, earlier this year.

While it is clear that levers work, getting the levers right remains a problem as the focus and direction of successive Strategies have been adopted largely without input from learners themselves.

The previous Strategy had goals for Māori and Pasifika, and 18-24 year-olds. It is natural then that there was achievement in these areas. However, all institutions with equity plans have a wider focus than this, for example student with disabilities, students from lower socio-economic areas, first in family, students from refugee backgrounds, etc. What we have seen is that the institutional focus naturally shifted to the areas where the policing takes place.

We are particularly concerned about the absence of the identification of students with disabilities in the document. This is a group that has been considerably disadvantaged by changes that tighten the requirements to complete in a designated timeframe, and from an approach to support that is not focused on individual needs.

As stated earlier, our preference would be for all institutions to have equity plans that take into account the communities that they serve, and that are developed through robust and democratic procedures, and to which they are held accountable by the Tertiary Education Commission. Failing that, we would like to see the inclusion of students with disabilities, students from lower socio-economic backgrounds and students from refugee backgrounds, in that order of priority.

### **Delivering the Strategy**

We agree with the proposal that all parts of the system have a responsibility to support te reo, tikanga Māori and mātauranga Māori.

We are concerned with changes that have been made to the definitions of the sub-sectors; as follows:

- As we have noted we believe that it is inappropriate for universities to be measured on achieving “good employment outcomes” when so much of the responsibility for this lies elsewhere. As noted, the most significant area of over-supply is where the government is the funder, educator and employer. We strongly recommend that “acting as critic and conscience” should be reinstated into the definition.
- We believe that wānanga should be recognised as having a leadership role in mātauranga Māori but agree with the recommendation that wānanga should not be viewed as owning mātauranga Maori. The experts developing mātauranga maori in the context of wānanga are in most cases, university educated themselves. We agree that we cannot afford to discount the role of ITPs and universities in the development and promulgation of information around mātauranga maori.
- We wonder why ITPs no longer have a responsibility for applied research.

- We question why PTEs are identified as contributing to “competitive innovation”. All TEOs should be being charged with being innovative in their research, and teaching, including in ways of delivery.

We believe that a significant failing of the current system, which seems to be being exacerbated by these definitions, is that there is insufficient collaboration across and between sub-sectors. We believe that one area where this is most glaring is the lack of a firm direction being given in terms of pathways and stair-casing from lower to higher-level qualifications.