



Dear Valued Professional Skin Therapist,

Happy New Year and welcome to 2021 everyone.

With the continuation of changes in education from last year, the New Zealand government are changing the way in which the beauty industry training will be provided and governed in the future. The existing industry training organisations are to be replaced from approximately June 2021 onward, which will have significant implications on the quality, costs, and implementation requirements for industry training.

As the NZ Board of Professional Skin Therapies is recognised as a major industry stakeholder by the Ministry of Education and on your behalf, we have been able to persuade the ministry to recognise the beauty therapy industry as being associated with the health, community, and social services WDC sector rather than in Creativity, Culture, Recreation and Technology WDC sector.

The Ministry of Education is now seeking to make changes to the law including this and other requirements and will close off public input on 5 February.

There are several items in their proposals that we must change as in our view, the changes will fail to improve standards and will merely increase costs by adding a layer of bureaucracy to an already poorly governed and managed training structure.

The Ministry of Education is seeking feedback and, frankly, they are not making this easy and rushing to push their agenda through.

They have set up a questionnaire on their website “Have Your Say” and we need as many people as possible to respond to this, so our views are taken seriously.

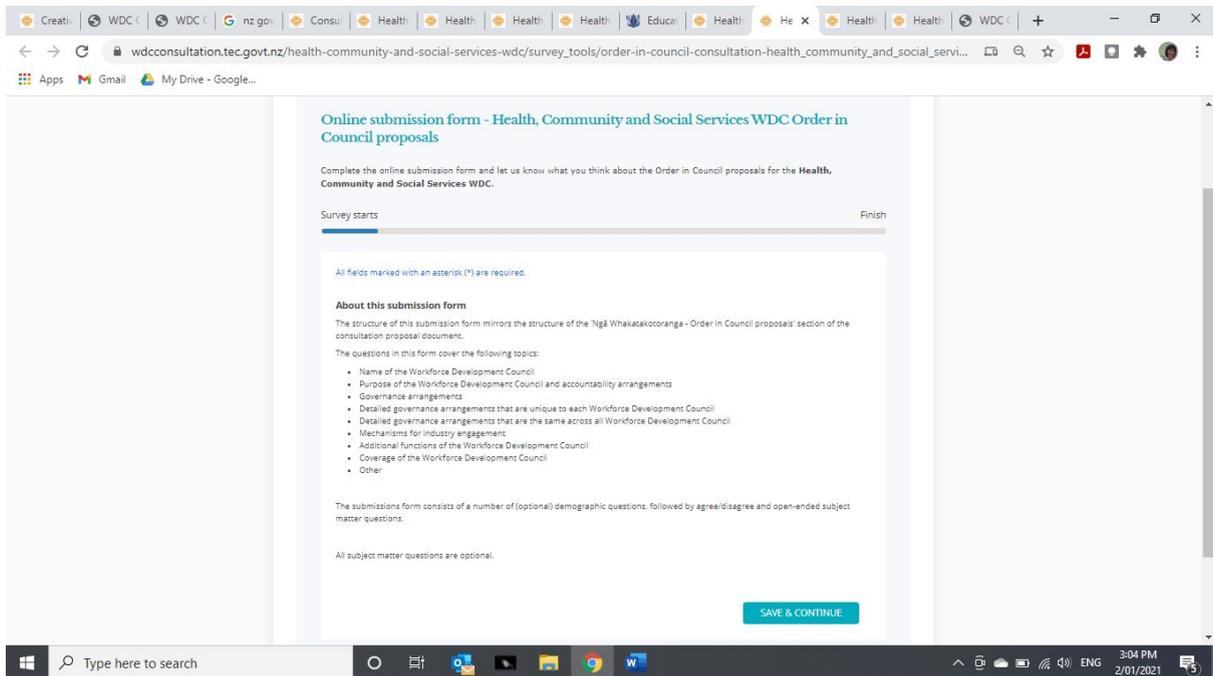
#### **WE NEED YOU TO TAKE ACTION**

We are asking you to give 15 minutes of your time to complete the MoE Order in Council submission form so we can ensure the future of our industry is safeguarded for us, our staff, and our clients.

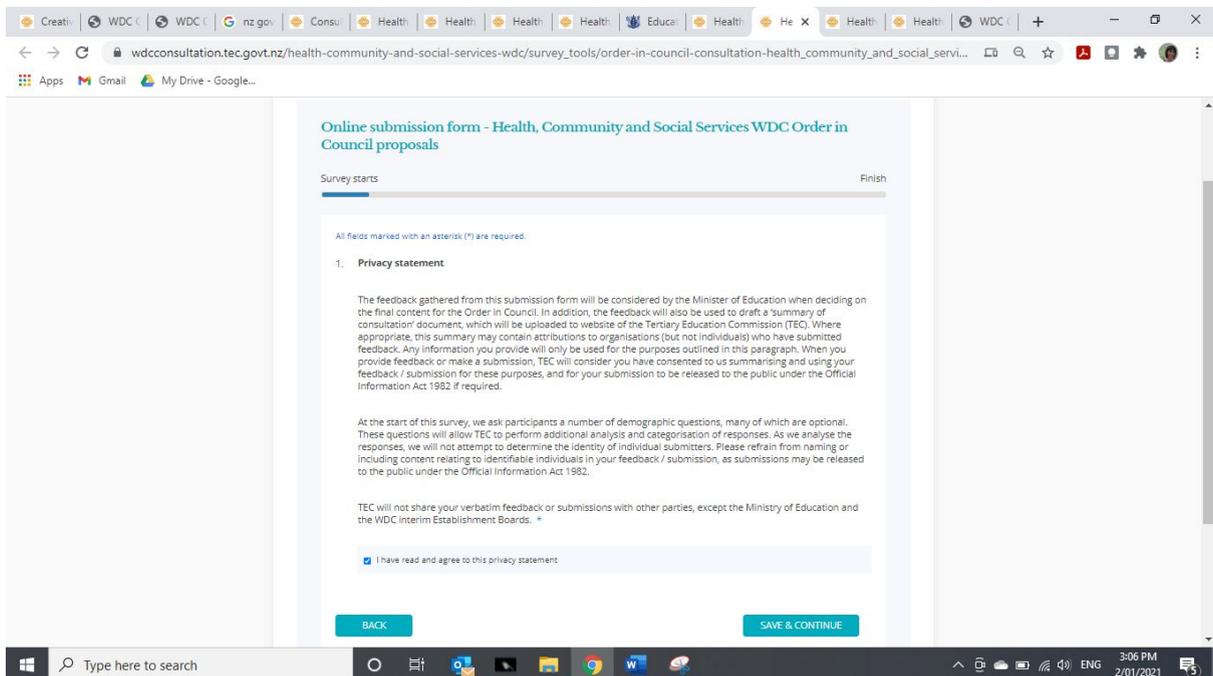
**The MOE submission form is anonymous, and you are not asked to provide any personal details,** unfortunately it is not easy to simply type in your views as they have made it necessary to go through each question page in turn. There are 28 questions, and we’d like you to answer six of these with our suggested responses using the instructions on the following pages.

First click on “[Online submission form - Health, Community and Social Services WDC Order in Council proposals](#)” (if this link does not work please cut and paste the link below into your web browser)

[https://wdcconsultation.tec.govt.nz/health-community-and-social-services-wdc/survey\\_tools/order-in-council-consultation-health\\_community\\_and\\_social\\_services](https://wdcconsultation.tec.govt.nz/health-community-and-social-services-wdc/survey_tools/order-in-council-consultation-health_community_and_social_services)

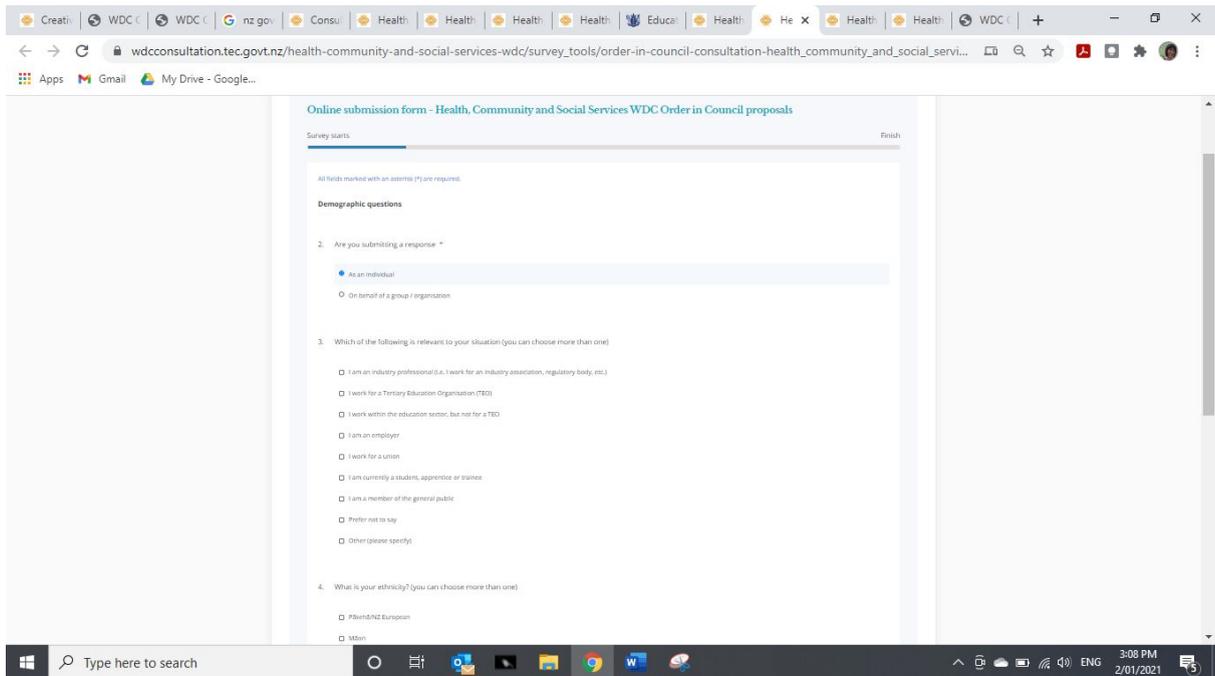


Click



Click the Privacy check box and then





Please click on “As an **Individual**” to question 2 we have already provided a response as an organisation

Question 3 ***Which of the following is relevant to your situation (you can choose more than one),*** please check “I am employer” even if you do not employ staff, as there is no option for “working therapists”

Questions 4 & 5 please complete as these apply to you.

SAVE & CONTINUE

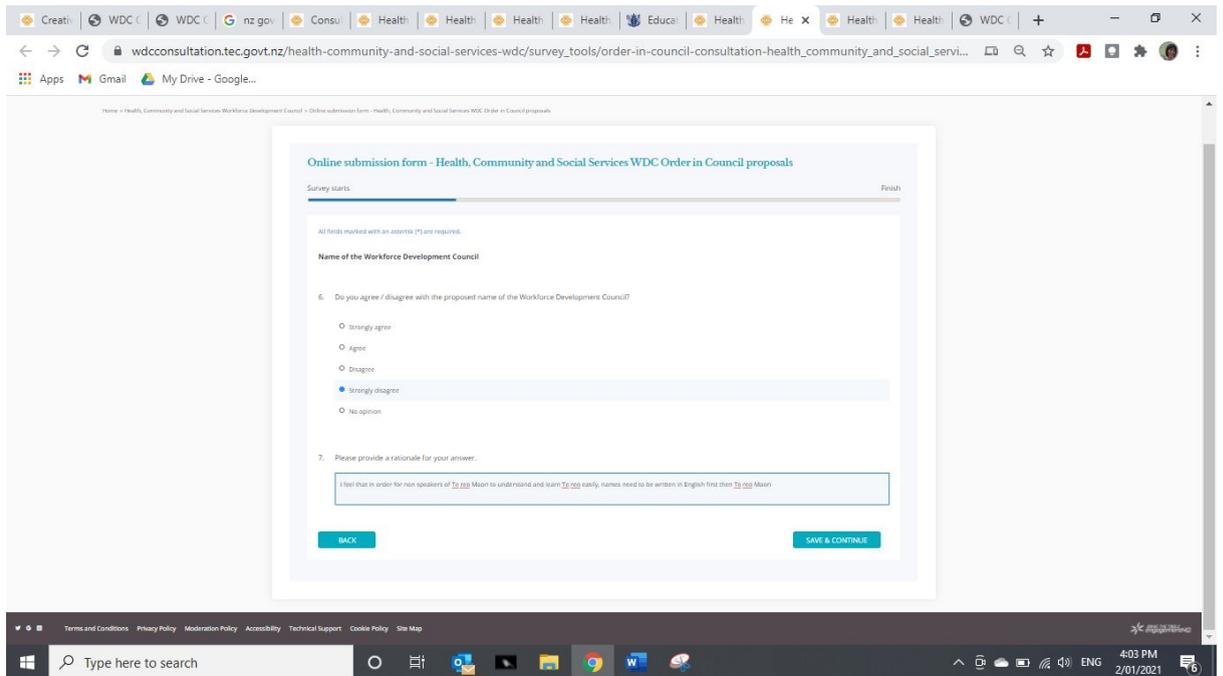
Click

Question 6 and 7- ***Do you agree with the proposed name of the WDC?***

The NZBPST, feel that in order for non-speakers of Te Reo Maori to understand and learn Te Reo easily, names need to be written in English first then Te reo Maori.

We therefore suggest you click “Strongly Disagree” to Question 7 and then to Question 8, ***please provide a rationale for your answer***, we suggest you cut and paste the following text,

***I feel that in order for non-speakers of Te reo Maori to understand and learn Te reo easily, names need to be written in English first then Te reo Maori***



Click

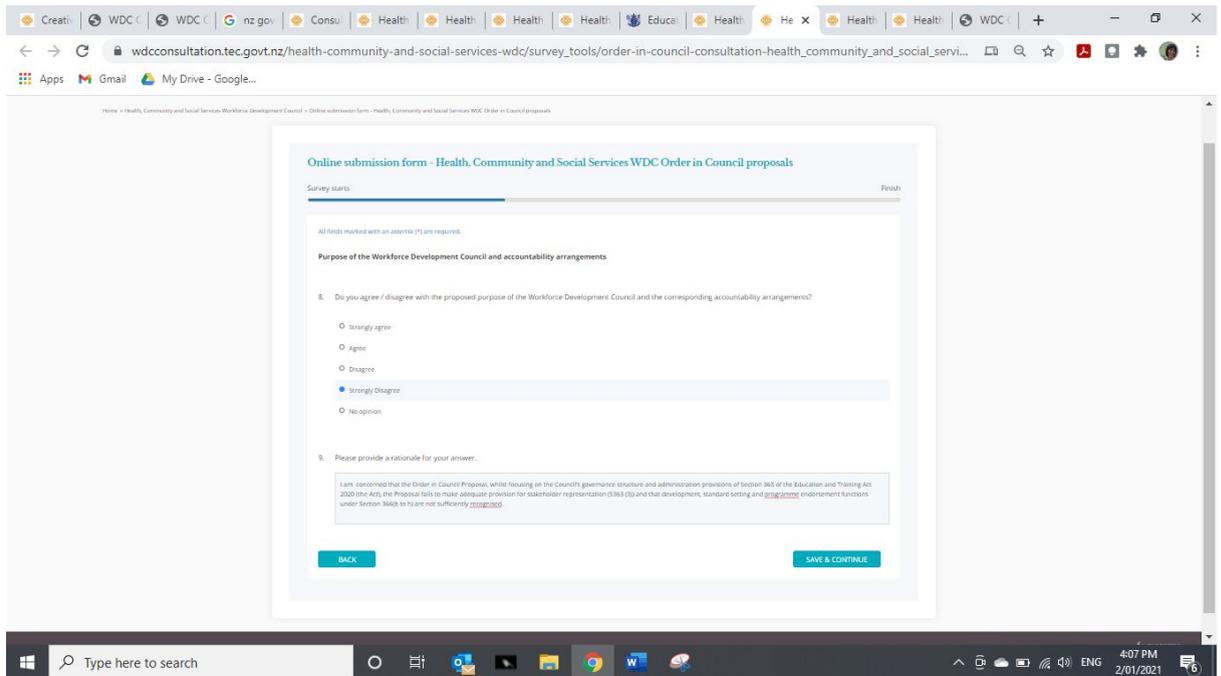
SAVE & CONTINUE

### Question 8 - ***Purpose of the Workforce Development Council and accountability arrangements***

The NZBPST, feel that the workforce development council lack sufficient teeth to be able to adequately enforce training standards and qualifications as currently promoted by the law change, we therefore suggest you provide the following responses.

Click “Strongly Disagree” to Question 8 and then to Question 9, ***please provide a rationale for your answer***, we suggest you cut and paste the following text,

I am concerned that the Order in Council Proposal, whilst focusing on the Council’s governance structure and administration provisions of Section 363 of the Education and Training Act 2020 (the Act), the Proposal fails to make adequate provision for stakeholder representation (S363 (3)) and that development, standard setting, and programme endorsement functions under Section 366(b to h) are not sufficiently recognised.



Click

Questions 10 to 17 dealing with **Governance Arrangements** may be skipped as the NZBPST have no firm opinion on these questions.



Click

Questions 18 and 19 dealing with **Detailed Governance Arrangements that are unique to each Workforce Development Council**

**Arrangements** may also be skipped as the NZBPST have no firm opinion on these questions.



Click

Questions 20 and 21 dealing with **Detailed Governance Arrangements that are the same across all Workforce Development Councils** may also be skipped as the NZBPST have no firm opinion on these questions.



Click

Question 22 and 23 - **Mechanisms for industry engagement**

As with question 8, the NZBPST feels that under the current proposal the workforce development council is required to consult or engage sufficiently with us, the very people who form the industry and, therefore suggest you provide the following responses.

Click “Strongly Disagree” and then to Question 22, please provide a rationale for your answer, we suggest you cut and paste the following text,

I contend the following wording,

*“The Council must make arrangements (for example by establishing industry stakeholder groups) for ensuring that the specified industries have an adequate opportunity to provide input to the Council...”*

This fails to adequately ensure that the Council will involve stakeholder groups as required under 363(3) of the Act

More acceptable wording should be,

*“The Council must establish industry stakeholder consultation groups to ensure that the specified industries have an adequate opportunity to provide input to the Council. The membership of these groups should be proportionally reflective of the numbers of workers in each industry”*

Online submission form - Health, Community and Social Services WDC Order in Council proposals

Survey starts Finish

All fields marked with an asterisk (\*) are required.

**Mechanisms for industry engagement**

22. Do you agree / disagree with the proposed mechanisms for industry engagement?

Strongly agree

Agree

Disagree

Strongly disagree

No opinion

23. Please provide a rationale for your answer.

I contend that the wording:  
“The Council must make arrangements (for example by establishing industry stakeholder groups) for ensuring that the specified industries have an adequate opportunity to provide input to the Council...”  
Fails to adequately ensure that the Council will involve stakeholder groups as required under 363(3) of the Act.  
More acceptable wording will be:  
“The Council must establish industry stakeholder consultation groups to ensure that the specified industries have an adequate opportunity to provide input to the Council. The membership of these groups should be proportionally reflective of the numbers of workers in each industry”

[BACK](#) [SAVE & CONTINUE](#)

Click

[SAVE & CONTINUE](#)

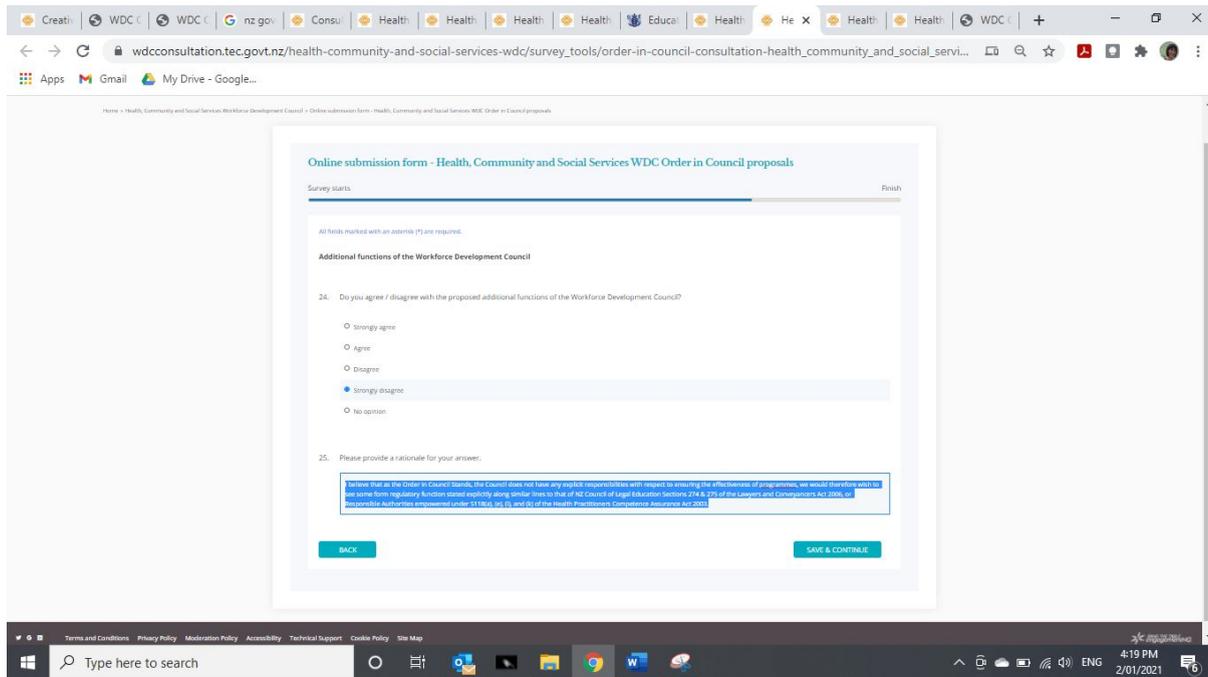
### Question 22 and 23 - **Additional functions of the Workforce Development Council**

The NZBPST feels that the MoE have completely failed to ensure that the new training governance organisation has explicit authority to set training standards and ensure that these standards are followed by training organisations to meet our industry needs. The Training and Education Act allows for these powers to be granted, and it seems to us that the MoE have cut corners to rush the law changes through.

We therefore suggest you provide the following responses.

Click “Strongly Disagree” to Question 22 and then to Question 23, **please provide a rationale for your answer**, we suggest you cut and paste the following text,

***I believe that as the Order in Council Stands, the Council does not have any explicit responsibilities with respect to ensuring the effectiveness of programmes, we would therefore wish to see some form regulatory function stated explicitly along similar lines to that of NZ Council of Legal Education Sections 274 & 275 of the Lawyers and Conveyancers Act 2006, or Responsible Authorities empowered under S118(a), (e), (i), and (k) of the Health Practitioners Competence Assurance Act 2003.***



Click

Questions 26 and 27 dealing with **Coverage of the Workforce Development Council** although our industry is included, we feel that the term “beauty therapy” is no longer an appropriate or acceptable term as the term “beauty” is subjective and suggests a superficial approach to our clients.

We therefore suggest you provide the following responses.

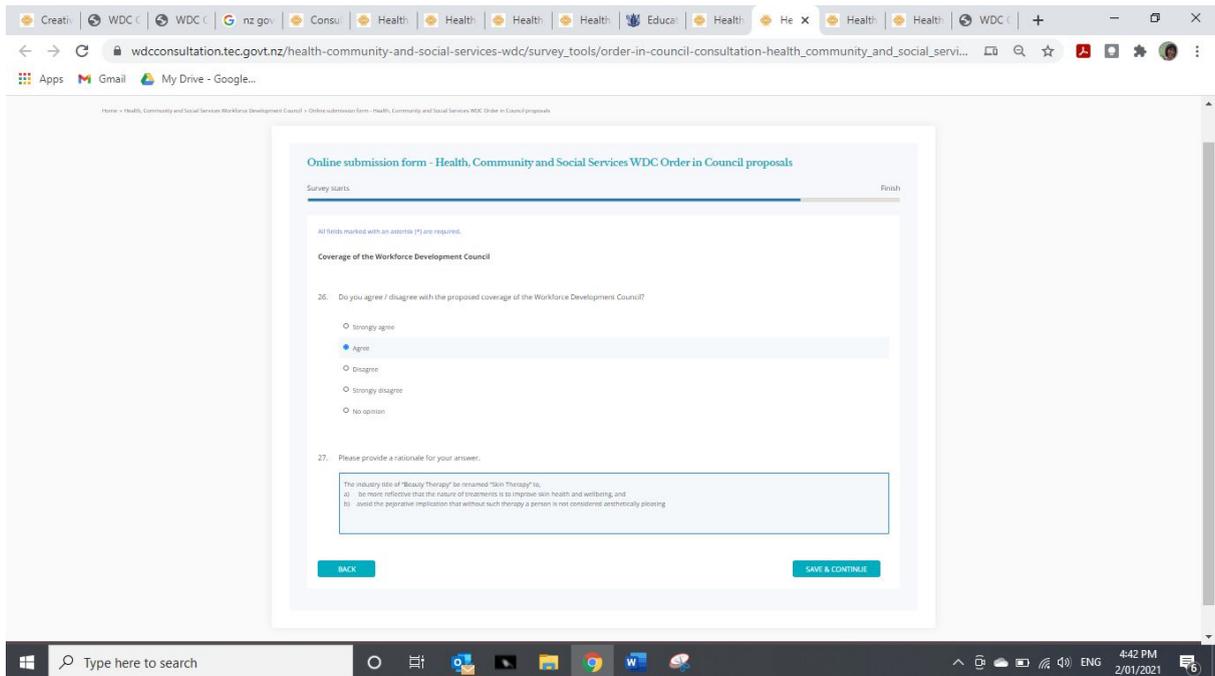
Click “Agree” to Question 26 and then to Question 27, **please provide a rationale for your answer**, we suggest you cut and paste the following text,

***The industry title of “Beauty Therapy” be renamed “Skin Therapy” to,***

- a) be more reflective that the nature of treatments is to improve skin health and wellbeing, and***
- b) avoid the pejorative implication that without such therapy a person is not considered aesthetically pleasing***



Click



Final question, 28 **Is there any other feedback you would like to provide on the Order in Council proposals?** The NZBPST have nothing else to add although you may wish to add any comments perhaps noting that Question 2 does not appear to recognise that many (60%) of skin therapists are sole traders or may be employees whose views need to be considered.

Please comment on any experiences or problems you have seen with regard to industry training as a result of no enforced regulatory requirements.



MoE has indicated that in order for them to take our requests seriously, they need to see proof of our interest and input. So please support industry. Also, please find attached our petition form and collect as many signatures from your clients, staff and public as possible. Forward to us by the 1<sup>st</sup> Feb so we can lodge it with the minsitry.

As always the NZBPST is watching out and standing up for you, your staff and your clients.

If you have any questions or difficulties with this form, please don't hesitate to contact me.

Kind regards

**Julie Martin**  
Chair-NZBPST

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The NZ Board of  
**PROFESSIONAL  
SKIN THERAPIES**  
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