

18 June 2025

# EDUCATION AND TRAINING AMMENDMENT BILL

Public consultation  
submission presented by:

**NZGDA**

NEW ZEALAND  
GAME DEVELOPERS  
ASSOCIATION



# FORWARD



The New Zealand Game Developers Association (NZGDA) appreciates the opportunity to respond to the Education and Training Amendment Bill. As a representative of one of New Zealand's fastest-growing digital sectors, generating over \$548 million in revenue in the year ending March 2024, we are deeply concerned that the proposed changes to the vocational education and training (VET) system will not deliver the outcomes required to support our industry or the broader digital and creative economy.

The Government's intent to ensure industries have a skilled workforce is welcome. However, as currently drafted, the Bill is unlikely to achieve this outcome, particularly for innovative and high-growth sectors such as game development and digital technologies. These industries are key drivers of New Zealand's future economic growth and require a responsive, coordinated, and future-ready skills system.





# 1. EXCLUSION FROM INDUSTRY SKILLS BOARDS (ISBS)



NZGDA is alarmed that the digital and creative sectors, including game development, have not been allocated to any of the proposed ISBs. No rationale has been provided by TEC for this exclusion, despite multiple requests. The current proposal risks entirely omitting an industry that is at the forefront of innovation and economic growth. Without a home in the new system, our sector will lack formal representation, coordination, and advocacy within vocational education. This omission will severely hinder the pipeline of skilled talent needed to sustain our rapid growth.

## 2. LOSS OF INDUSTRY LEADERSHIP AND INFLUENCE

Replacing the current WDC structure with ISBs strips industries like ours of the leadership role necessary to shape training and workforce strategies. Under the WDC model, the creative tech sector benefitted from a dedicated, industry-led voice advocating for training investment and qualification development aligned with our fast-moving needs. The proposed ISB functions reduce this to a passive advisory role, with TEC no longer required to act on or respond to ISB advice. This change will reduce our ability to influence investment decisions, qualification frameworks, and training delivery, and is particularly damaging for sectors experiencing rapid technological change.

The Bill risks entrenching a broken VET system that is misaligned, fragmented, and applies a 'one-size-fits-all' approach. Aotearoa urgently needs a coordinated and responsive skills system to unleash the potential of future-focused industries like ours.



### 3. LACK OF AGILITY AND RESPONSIVENESS

Our sector cannot afford to wait 18 months for qualifications in areas like AI or game engines to be approved. The current system already struggles to keep pace with evolving technologies, and the new legislative structure does nothing to improve this.

Without a dedicated ISB or empowered body to prioritise agile qualification development, New Zealand risks falling behind international competitors in digital skills education.

There is a lag effect in the skills system—changes today take years to impact industry. Now is the time to build a VET system that's ready for the economy of the future.



Sleight of Hand, RiffRaff Games

### 4. FREELANCERS, CONTRACTORS, AND NON-TRADITIONAL WORK

Game development is characterised by a project-based, highly mobile workforce where freelancing and contracting are the norm.

The Bill's language focuses entirely on "employers and employees," ignoring the majority of our workforce who do not fit that model. VET policy must explicitly include support for work-based learning that is accessible to self-employed, freelance, and contract workers. Without this, we risk further marginalising a critical part of the creative workforce.



## 5. GOVERNANCE AND EQUITY

The removal of requirements for Māori representation, employee representation, and collective voices in ISB governance will directly impact the quality and relevance of training for our diverse sector. Māori creatives, disabled learners, and other underserved groups need structured support and representation to access pathways into game development and digital careers. Toi Mai's work in this area has been invaluable, and we are concerned this progress will be undone under the new model.

We also urge the Government to reconsider the requirement for ISBs to have eight members. A smaller, more efficient governance model, backed by accessible industry expertise, would allow ISBs to function more effectively and reduce unnecessary overhead.

## 6. NEW CHARGING POWERS AND POTENTIAL INDUSTRY LEVIES

The introduction of powers for ISBs to charge fees or levy industry groups raises concerns around fairness and consultation. In a sector dominated by micro-studios, freelancers, and independent creators, imposing fees without clear protections or subsidy mechanisms could undermine training accessibility.

Any consultation on levies must be designed to engage meaningfully with the structure of the creative workforce and not that of a traditional business structure.



Doomsday Vault,  
Flightless

# 7. RECOMMENDATIONS

**NZGDA supports the need for reform and sees this Bill as an opportunity to strengthen the VET system for high-growth, innovation-led industries.**

## **NZGDA Recommends:**

- 1** That the digital and creative sectors be explicitly assigned to an Industry Skills Board, or that a dedicated ISB be created for this sector.
- 2** That ISBs retain an industry leadership function and that TEC be required to consider and respond to their advice.
- 3** That freelancers and non-traditional workers are explicitly included in the scope of work-based learning.
- 4** That representation of Māori and underserved populations remains a legislative requirement for ISB governance.
- 5** That ISB governance structures be streamlined to improve agility and access to relevant expertise.
- 6** That any charging powers be subject to transparent consultation processes with protections for small operators.
- 7** That the Government establish a national skills strategy and a national skills agency to ensure long-term coordination and investment across the VET system.

## **Related to:**

***Part 37D, Schedule 22 - ISB scope definitions and allocation process.***

***Sections 366B, 366E, and 366F - Functions of ISBs and TEC's obligations.***

***Section 369(2)(a) - Definition of learners and work-based learning provisions.***

***Schedule 22 - ISB governance provisions; removal of clauses requiring representation.***

***Schedule 22 - Requirement for ISBs to have eight members.***

***New sections providing for ISB cost-recovery and levy charging powers.***

***Recommended policy development beyond the scope of the Bill; relevant to long-term systemic reform.***

**With these changes, New Zealand has a real opportunity to create an industry-responsive, internationally competitive skills system that supports future-focused sectors like game development.**