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By email: vocationaleducation.reform@education.govt.nz

### Water New Zealand – Submission on Vocational Education Reform

#### **Background Information**

This submission is made by Water New Zealand on behalf of its members.

Water New Zealand is a national not-for-profit sector organisation comprising approximately 1900 corporate and individual members in New Zealand and overseas. We are the principal voice for the water sector, focusing on the sustainable management and promotion of the water environment and encompassing the three waters (drinking water, wastewater and storm water).

In relation to the water industry, the current review of vocational education reform has implications for other work that Government agencies are currently undertaking. Specifically the Three Waters Review currently led by the Department of Internal Affairs and as part of that, measures to establish a new national drinking water regulator. Water industry education and training was identified as a significant issue in the Report of the Havelock North Drinking Water Inquiry, and has been raised as a significant issue in the Three Waters Review.

There is an urgent need to resolve water industry education and training issues if some of the wider industry problems are to be addressed. Consultation by Water New Zealand with the sector in late 2018 indicated that many employers thought they had been poorly served by the Industry Training Organisation (ITO) structure. This may be in part due to the small size of the sector and the very small number of trainees relative to other sectors.

While significant progress has been made recently in the delivery of apprenticeship programs, this appears to be at the expense of diploma level courses which are currently not available.

Water New Zealand training initiatives established in the 1990's, such as the NZ Water and Education Training Academy, have since languished. Recently the Water New Zealand Board directed the organisation to take a greater leadership role and put in place a number of initiatives to ensure the needs of water industry employers and employees are met.

Hence, a key pillar of the work that Water New Zealand's proposes to undertake is capability development through education and training. It is to this pillar that this submission relates.

Water New Zealand's submission provides comment on each of the three proposals, and the questions asked by the Ministry of Education in the consultation document.

We are supportive of the proposed vocational education changes, as the current system has not served the industry well. Because Water New Zealand is central to the water industry and we consider education and training critical to the success of the sector, we would like to contribute positively to and participate in the changes.

#### **Opening Questions**

### 1) What do you think the Government needs to understand about the current system to inform its work on changes?

Water industry training has had a somewhat turbulent past, the outcomes of which have reduced education and training opportunities for those working in the industry and resulted in serious concerns being raised by a number of participants about the ability of current arrangements to deliver the education and training that the industry needs. As a result, Water New Zealand has increasingly taken a role, particularly in non-qualification education and training in an effort to ensure the competence of workers in the sector. If the status quo was to remain, we could see foresee a time when water industry training could be undertaken completely outside the TEC / NZQA apparatus. This would not be an ideal outcome but our view is that current arrangements do not deliver the education and training that this small but highly specialised industry needs.

### Summary of water ITO changes

Water industry training was originally managed through a dedicated Water ITO, before this was formally merged into the newly established "Primary ITO" in 2012. Despite the passion and dedication of the water industry staff, water industry training languished inside the largely dairy-centric ITO.

In December 2014, for a variety of reasons, responsibility for water industry training was transferred to the Infrastructure ITO (trading as "Connexis"). This transfer was supported by the Tertiary Education Commission (TEC) and approved by the Minister.

#### Brief history of key water industry education and training activities

In the period 2014 to 2019 the following key activities were undertaken:

- Update of all relevant Unit Standards by the ITO.
- Development of a continuing professional development programme overseen by an independent Water Industry Professionals Association (WIPA) though this was never implemented.
- Development of a proposal for an 'Operator Certification Programme'. A business case and request for funding was presented to the Ministry of Health (responsible for drinking water regulation) in relation to the scheme but programme was not funded and hence not implemented.

While the latter two of these activities involved Connexis, they were industry-driven initiatives with the development work funded either by industry or by Water New Zealand.

In 2017, Water New Zealand (on behalf of industry) provided Connexis with \$130k to assist Connexis to develop learning resources for a New Zealand Apprenticeships in Water Treatment. The first intake of this blended learning, web-based course commenced in 2018.

#### Recent review of water industry training

In 2018 Water New Zealand undertook a review of water industry training. There were several drivers for this review including:

- A lack of available water industry training programmes particularly the NZ Diploma in Water Treatment for which enrolments were stopped in 2017.
- A perceived lack of focus it was anticipated that through the transfer to Connexis, water industry training would flourish because of the cross-over with civil industry training and the economies of scale benefits that would result. Industry didn't feel that this had been achieved.
- Consequences anecdotal evidence suggested that the lack of industry training
  activities was adding to growing recruitment and retention concerns within the
  sector and was affecting the ability of water suppliers to meet all of the Ministry of
  Health regulatory requirements.

As a result of this review, Water New Zealand:

- Established an independent industry-centric education and training advisory group.
- Is in the process of recommencing the WIPA registration and CPD programmes in partnership with the Water Industry Operators Group (WIOG).
- Is funding the development of a water industry competency framework.

#### Summary of water industry training current state

The water industry is best characterised as 'small but committed'. Despite Connexis devoting considerable resources to the development of a blended learning apprenticeship at the request of industry there remains a perception among many in industry that water industry training is not a key priority for the ITO's.

The Water New Zealand Board has decided to commit to taking a leadership role across water industry education and training, and is now setting up the networks, processes and systems to enable industry to lead its own formal and informal education and training activities.

In terms of training delivery, it is important for Government to understand that water industry training is currently delivered by specialist providers, which exist wholly outside of the Industry Training Provider (ITP) network. ITP's are simply not currently set up to support the water industry.

### 2) Does [our] description of the current problems and opportunities within the vocational education sector look right to you? Is there anything you would add or remove?

Water New Zealand agrees with the need for reform across all parts of the system to a greater or lesser extent. However, it appears that discussions are weighted more heavily towards reform at the delivery end of the system. Problems with quality assurance processes and the development of education and training resources have not been described in any detail. These are two of the bigger symptoms of current problems.

Water New Zealand would like the Government to recognise equally, the need for better quality products being developed at the front end of the system, and better processes for measuring delivery and student outcomes.

### 3) What problems or opportunities do you think should be the priority?

The biggest opportunity for the water industry is:

• Taking back control of water industry education and training from a vocational education system that has consistently marginalised (or at least not prioritised) the water industry training needs of both employers and students.

The biggest problems / challenges ahead (for all industries) will be:

- Implementation without strong leadership and clear direction the shift will be compromised by those in the education sector who are invested in the status quo.
- Having clear lines of engagement ensuring that everyone who needs to be involved is involved, and duplication of effort is minimised or eliminated altogether.
- Preparation of learning resources ensuring that resource preparation makes use of industry expertise and reflects the needs of water industry employers.
- Funding It is not currently clear how Government intends to:
  - Ensure the new agencies are funded appropriately (with the right mix of funding allocated across functional roles, e.g. admin, development, delivery and quality)
  - Ensure that each industry sector can contribute financially (with clear direction on what is to be self-funded and what may not).

An example of a water specific issue is there is a lack of stormwater training at all levels (including the ITP level), which is why Water New Zealand has embarked on preparing an industry stormwater training plan. We think there could be recognition of the national approach we are taking to address current deficiencies in stormwater training.

We have identified a significant need for capability development in the stormwater industry at the professional/CPD level, and this is not accommodated in the current arrangements. Our stormwater committee would like to see a three-waters CoVe resourced to manage a strategic training plan that reflects the multi- and trans-disciplinary complexity of three waters management. This would then inform the development, delivery and evaluation of the effectiveness of this much-needed training, like the Cooperative Research Centre (CRC) for Water Sensitive Cities based at Monash University in Melbourne. A centre of excellence was discussed at the Training Forum at the 2018 Stormwater Conference last year and had general support.

### Proposal 1: Redefined roles for industry bodies and education providers

### 1) Do you agree that the creation of Industry Skills Bodies would be a positive step in ensuring vocational education delivers to the needs of industry?

Yes. Industry Skills Bodies (ISB) need to be close to industry and respond to the education and training needs identified by existing industry bodies. If they have a clear mandate and role and perform their functions without being distracted by a need to arrange and support delivery (as currently happens with ITOs), water industry vocational education will be better served.

### 2) What do you think about the new roles proposed for industry, employers and education providers?

#### Industry and employers

We agree that there is a need for industry or employers to be closely linked to all aspects of the preparation of qualifications, preparation of resources and delivery of courses. While we expect to see more detail of how that might be achieved, the principle is supported.

If the delivery of vocational education is moving closer to the workplace, so should the development of the learning resources, with industry groups and employers having greater involvement than they do now. Because the current system has not worked as well as it might for industry, some industries (including employers) have taken on a greater role in the development of education products for their own staff. It appears that resource development is proposed to sit with Centres of Vocational Excellence (CoVEs), which in turn are proposed to sit inside the New Zealand Institute of Skills and Technology (NZIST). It will be critical that CoVEs, as well as ISBs, are closely linked to the water industry.

To this end, applications to become Industry Skills Bodies, from industry organisations should be favoured. Government might also consider providing for CoVEs to be resourced with industry subject matter experts.

#### Education providers

The key new formal role for education providers appears to be that they should be empowered to manage the whole end-to-end process for learners in future.

Water New Zealand fully supports this proposal as there has been a great deal of crossover and confusion in this area with the current arrangements through ITOs. For example, the 'pastoral care' of students in the water industry was intended to be shared between the ITO, course providers and employers. Consultation with the sector indicates there are considerable differences of opinion about how well this function has been discharged.

### 3) How might [the new roles] benefit employers and learners? What will the risks be? What is needed to help them work well?

If industry is involved, then industry will invest. The degree to which industry groups, employers and learners are an integral part of the vocational system, will determine the benefit realised by these same groups.

There does appear to be some risks implied by centralisation that employers and learners will have choice removed. Employer choice is spoken of in the consultation documents, but it's not clear how centralised enrolment (for example) will support an employer or learner choosing a provider and/or provision method to best suit their needs. (Again, it's important to bear in mind that water industry training is currently delivered outside of the ITP network).

This risk could be minimised in the following ways:

- By investing in training equipment within the NZIST network to meet industry needs (for example, simulation equipment, as is used currently)
- Allowing resource development to be undertaken or assisted by private specialists where capability does not exist in the new ITP network (as is the case currently)
- Provider organisations (whether government or privately-owned) being sufficiently independent to allow innovation in course development and delivery methods.
- Customisation, in terms of courses, location, and delivery method, being enabled at both the employer and learner level.

### 4) The Government wants to help more employers get involved in the vocational education system. Do you think the proposed changes would achieve that? Why or why not?

In principle yes, but the detail of the proposals will be critical to ensuring this happens. Three critical aspects are:

- The new scope and roles of ISB's and CoVEs need to be determined and clarified. Both roles need to have clear scope, with close collaboration and no crossover between them, and strong links to industry.
- The functional role of each entity remains open in some areas (most notably in assessment which may be partially through ISB's, and in quality assurance NZQA is hardly mentioned).
   Clarification of how and by whom assessment will be undertaken is critical.
- Lines of engagement are unclear with every entity (from Regional Leadership Groups through to the TEC) practically proposed to engage with every other entity. The current system enables a somewhat scattered approach, which can easily result in confusion and duplication of effort. With a holistic reform of the system, there are huge benefits to be gained from having clear lines of engagement.

In practice, the degree of employer involvement will depend on who leads the ISB and CoVE roles for each industry and whether they are respected by industry. Capability, functionality, and lines of engagement must be proposed before this question can be further responded to.

Water New Zealand appreciates the need for a fast turnaround of change, but this should not be at the expense of full consultation. The Government may wish to consider inviting applications for the new roles, followed by a second round of consultation when a clearer picture has been drawn for each industry.

5) To make the proposals for new roles for industry bodies and providers work well, what changes would be needed at education providers? What in turn would be needed to ensure those changes happen?

Generally, providers will be best supported through an inclusive and consultative change management process. More specifically:

- Strong leadership and guidance by national office administration, including delivery models (or options in this regard), supported by templates and processes and an integrated IT infrastructure to support the whole system.
- Customisation at regional level, for primary and secondary industries especially. Flexibility at
  regional level is necessary in the water industry (for example) to accommodate variations in
  local policy and technology with different Territorial Authorities. A more standardised,
  national approach could be taken for tertiary industries, or they could be covered by the
  university sector, as they require less customisation.
- Recognition and empowerment (through funding) of the specialist capability within industry, required to deliver resource development and training in the best way possible, to meet industry needs.
- Regular review of the national system and each provider, through a survey designed with input from industry groups, and completed by employers and learners.
- 6) What are your thoughts on Centres of Vocational Excellence? How should their roles be defined and how should they work with Industry Skills Bodies and providers? What should their relationship with Regional Leadership Groups be?

CoVEs must be placed as close to their industry as possible. It will be very important for industry to continue to own the learning resources which are produced from the industries body of knowledge. So, while some educational expertise must be injected into the mix, subject matter experts must sit at the heart of these CoVEs. They may not be employed by CoVES, but could be seconded from industry for specific tasks.

It is our view that the ISB role should reside in between Regional Leadership Groups and the CoVEs. We foresee RLGs mining local data, ISB's translating these into industry-based outcomes, and CoVEs developing learning resources to deliver those outcomes. In this way, the ISB role would be responsible for managing the tension between regional concerns and national standardisation. We believe that industry groups are best placed to do this.

7) Do employers need access to impartial advice on their training options, and help making the right connections with education providers? If so, how should this service be provided?

Yes they do. The industry has recently set up an independent Water Industry Education and Training Advisory Group which is administered by Water New Zealand. The advisory group is made up of representatives from a range of water industry organisations and provides education and training advice to any organisation that seeks it. It is a key advisor to Water New Zealand on our education and training work.

Additionally, Water New Zealand is funding the preparation of a water industry competency framework to guide water utilities in education and training planning. The competency framework not only includes work related competencies but has been drafted to help provide a link to those education providers best placed to service our industry.

With the registration/CPD programme, these initiatives are intended to assist water industry employers to be able to make good decisions about education and training for their staff.

Ideally the new system could provide such a service only if the mandated entity was not biased by the provisions of the funding model (yet to be designed).

Ultimately, employers need assurance that:

- The training they're investing in will meet the needs of themselves and their staff through the product development and programme design process – this must include the development of programmes that do not exist currently.
- Some customisation can occur at point of delivery in terms of course content this is
  particularly important for the water industry as different local bodies use different
  technologies and local standards.

If this assurance can be provided by a new vocational education system, this will greatly reduce the need for independent advice and/or development.

## Proposal 2: Proposals for the New Zealand Institute of Skills & Technology

Do you agree with the Government's proposal to introduce a single New Zealand Institute of Skills & Technology? What do you think the institute should be called – is the New Zealand Institute of Skills & Technology the right name?

If the NZIST can create efficiencies in the administration of vocational education and training, then Water New Zealand supports this proposal. We have no opinion as to the name of any new entity.

2) What should Government, the ITP sector and its stakeholders keep in mind if we were to design and implement a New Zealand Institute of Skills & Technology for all New Zealand?

Amalgamation of the ITP network could be a good thing for the future of vocational education, but the Government must be mindful that some industries, like water, are not unified in their needs. Some of our employers (e.g. councils) having different policies, resource management strategies and variance in technologies supporting their infrastructure. So, while it may be tempting to standardise programme design and delivery, along with the centralised model, this can only occur to the extent that an industry has nationally-aligned needs.

Along with ISBs and CoVES, training providers need to be connected to industry and learners will benefit if ITPs are structured so that industry subject matter experts can assist in course delivery. The constant introduction of new technology but practical nature of the work that employees undertake requires that they receive some instruction from people who have recent practical experience.

### 3) What purposes and functions could be included in the charter of a New Zealand Institute of Skills & Technology?

The role of the NZIST is to administer and facilitate the provision of vocational education and training. It should be focused on empowering the provider network (both government and privately-owned training organisations), provide guidance, administrative and infrastructure services to the vocational education sector.

### 4) How could we best ensure that a New Zealand Institute of Skills & Technology would deliver to the needs of New Zealand's regions?

By allowing the regions to retain local intelligence, education capability and industry expertise. A closed set of operational models could be developed that regions could choose from so they retain some decision-making capability, and accountability. It is critical that the creation of the NZIST does not stifle innovation in vocational education and training.

### 5) What kind of Regional Leadership Group structure might work best, and what other functions could these groups fulfil? What should the term for these regional groups be?

Water New Zealand would ideally have local authorities well-represented in the water related RLGs. These groups should focus on gathering intelligence from local employers and prepare it for distribution to the ISB's based on the industry the intel relates to, for them to convert into national standards.

# 6) Do you believe that Regional Leadership Groups will be able to actively and representatively consider iwi and Māori interests? If not, what other vehicle or means of understanding Māori skills needs could be considered?

Regional Leadership Groups, like ISBs, CoVEs and ITPs will only be able to actively and representatively consider iwi and Māori interests if Māori are included in decision making and are represented in influential roles throughout those organisations. The structure of these organisations will need to include specific roles for Māori. Many Māori work in the water industry and as students they will do best if they see Māori undertaking key roles in the education and employment organisations that they are involved with.

Effective engagement will be key to ensure good relationships with iwi, meet Te tiriti o Waitangi obligations, and to incorporate Mātauranga & Tikanga Māori.

We submit that TEC undertake further discussion directly with Iwi, mana whenua and Treaty entity partners to ensure that Te Ao Māori is incorporated into this discussion at the beginning, and to ensure Crown obligations under Te Tiriti o Waitangi o Aotearoa are met.

Incorporating Mātauranga & Tikanga Māori into solutions and decision making regarding training by parting with whanau, hapū, iwi, and hāpori will create change and facilitate the transfer of knowledge and actions to and for future generations.

The key aspect of vocational learning delivery that encourages Māori participation and success is to value Te Ao Māori, incorporate tikanga and implement it.

### Proposal 3: A unified vocational education funding system

### Do you agree that a unified funding system for vocational education, encompassing both provider-based and work-based learning, will help to improve our overall vocational education system?

Yes, but only if an appropriate basis for unification is designed and implemented. There is insufficient detail at this stage, we only understand that all providers are to be funded based on the same algorithm. There may be other approaches worth considering.

Given the proposal to move training closer to the work-place, and the exponential development of self-directed learning on-line and through simulated technology, we believe the question of what gets funded seems to be a more pressing question to answer, rather than who.

#### 2) What do you think the Government needs to consider in designing a new funding system?

If the Government is to effect any change through the reform, a much greater shift in the approach to funding may be necessary. Historically, there is strong focus on delivery cost, with product development cost marginalised. In the water sector, the ITO has sought to recover product development costs from course fees. This has resulted in course fees being very high or where student numbers are low, inadequate development of course material occurring. Product development costs will only increase, as delivery costs decrease. Many courses are delivered entirely on-line now, and product development needs to occur faster and in line with technical advances.

Government needs to consider spreading costs so that specific course development is not expected to be funded only from the courses fees of the related course. Course fees from courses with large numbers of students could be used to subsidise the course development costs of courses with small numbers of students. If this doesn't occur there is a risk that courses with small numbers of students will have considerably inferior course learning material than courses with large numbers of students. The situation risks becoming an equity issue.

Whatever eventuates, Water New Zealand would like to see greater transparency in the allocation of funding and a better understanding of how Government and industry funding is spent. The water industry may be willing to contribute to the costs of developing course learning material, if it is clear where money is to be spent. That hasn't historically been the case.

### 3) Are the suggested elements for a vocational education funding system the right ones? What might be missing?

An industry-based approach might be considered. Industries with expensive assets and/or high risks will likely have higher costs in product development. For example, the water industry uses simulation tools so that trainees can practice without causing harm to expensive resources and public health. Simulation, or "near-job" tools can be expensive. Virtual Reality technology is another option for delivery. The cost of training will increasingly lie in the development, not the delivery, as technology increasingly replaces the human tutor. But this will vary between primary, secondary and tertiary sectors.

With the current mindset, ISBs are proposed to be funded for standards development, yet the greater cost lies in resource development, and ITPs are proposed to be funded for delivery, yet the learner is increasingly self-delivering on-line. We recommend the government consider giving industry a greater role in determining where funding is directed.

### Closing questions

### 1) What do you think about the impacts described above? Is anything big missing from the list?

We understand the desire by Government to optimise the current network of ITPs, and fully support this idea. There are certainly gains to be made in the amalgamation of back office and front office functions of the entire vocational education system, but we consider that the proposal is a little unclear on some important "middle office" elements, for example:

- Product development This is a complex process with many elements and inputs required to
  produce value for employers. This function is somewhat dispersed amongst multiple entities
  currently. In the water industry this critical process deserves greater focus, with clear roles
  and responsibilities, direct input from industry and funding that reflects future cost of
  development.
- Quality assurance The new system may result in fewer programmes and providers to moderate, but this key function should still be addressed, including who might be responsible (and how it could be funded).
- 2) How might different groups of learners be impacted by the proposals? In particular:
  - What unique issues or opportunities arise for Māori learners in the proposed new system?
  - What unique issues or opportunities arise for Pacific learners in the proposed new system?
  - What unique issues or opportunities arise for disabled learners and learners with additional learning support needs?

Water New Zealand considers that changes to vocational education provides an opportunity to better deliver for the specific requirements of Māori and Pacifica learners, those with disabilities and those who need additional learning support. It is most appropriate that those groups are provided with specific opportunities to directly advise Government on how their needs will be most easily met.

Water New Zealand does however recognise that a key aspect of vocational learning delivery that encourages Māori participation and success is when Māori students see Māori role models as teachers or working in the vacation that they are training for. This consideration should be a key aspect of course material preparation and course delivery. The participation of industry in these aspects of vocational education has the potential to facilitate this as many Māori work in the water industry. There needs to be the right balance of diversity and inclusion.

Specific funding and strategies will need to be considered for students with literacy and/or numeracy difficulties. Some people who work in the water industry have not enjoyed or been successful in primary or secondary education and while well suited to careers in the water industry, may have negative learning experiences or specific learning difficulties which affect their willingness or ability to participate in vocational education and training. Strategies to support these students are a

worthwhile investment in the water industry and in the students and will improve outcomes for both.

- 3) How might different groups of employers be impacted by the proposals? In particular:
  - What unique issues or opportunities arise for small and medium-sized enterprises in the proposed new system?

Accessing industry vocational education and training is difficult for small and remote water industry employers. It is difficult to have staff absent for training block courses. It can be difficult to find relief staff to cover while employees are at courses and this can be costly. Students in remote areas can feel unsupported and remote from learning organisations making completion of courses difficult for them.

On-line learning can in part resolve the issue of students being away from work on block courses, but this type of learning needs to be supported by employers with time for on-line study made available to students. It also requires active follow-up and monitoring of progress by tutors.

Mentoring is also a useful support to learners in remote areas or small organisations. It may be useful at the appropriate time to consider a mentoring programme for students undertaking water industry courses. This is where having close links to the water industry will be beneficial. It is possible that the industry could develop a network of mentoring support for all water industry students involved in water industry education and training.

### What unique issues or opportunities arise for Māori enterprises in the proposed new system?

Perhaps the greatest deterrent for Māori participation will be if the system is seen as another PāKeha educational programme. The opportunity for Māori in the proposed changes will be realised if Māori see in vocational training a reflection of their own culture, their people and their way of doing things. The changes provide an opportunity for this to occur. Incorporating Mātauranga & Tikanga Māori into solutions and decision making regarding training by parting with whanau, hapū, iwi, and hāpori will create change and facilitate the transfer of knowledge and actions to and for future generations.

Water New Zealand suggests to the Tertiary Education Commission that you undertake further discussion directly with Iwi, mana whenua and Treaty partners to ensure that Te Ao Māori is incorporated into this discussion at the beginning, and that obligations under Te Tiriti o Waitangi o Aotearoa are met.

### 4) How could the new system best ensure that specific learner groups – such as those identified above - can participate and achieve in vocational education?

Only by encouraging and providing opportunity to be involved and ensuring that vocational education and training reflects the specific learner groups. Those groups need to see themselves when they look at opportunities for vocational education and training. New technologies that allow for remote learning, can help to bridge cultural and physical differences, so providing for different methods of delivery may be the key to greater achievement. Again, this depends on appropriate funding being applied to product development.

5) Overall and in the long run, do you think the future arrangements being proposed for vocational education would be better or worse for you personally than the current arrangements? What about for any groups or communities you are a part of?

We believe the current system is too dis-aggregated and self-serving to provide for the needs of the water industry into the future. We welcome any change that provides us with opportunities to take a greater role in the development of water industry education and training. We are generally optimistic about the proposals, in principle and look forward to being further consulted as more practical detail is made available.

#### 6) What other ideas or models do you think we should be considering?

We believe that independent input and advice will assist is ensuring that changes to vocational education and training provide for the needs of the water industry. To this end, the recently established independent Water Industry Education and Training Advisory Group is available to assist with consideration of the proposed changes. We believe the key to the effectiveness of vocational education and training lies in the degree to which the learning environment links to and reflects working environment, on an ongoing basis.

Sincerely

John Pfahlert

**Chief Executive** 

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