



# Summary of Submissions Report

Based on the Tomorrow's Schools Independent Taskforce Interim Report

*Our Schooling Futures:*

*Stronger Together*

*Whiria Ngā Kura Tūātitini*



**Kōrero Mātauranga**  
Me kōrero tātou

## CONTENTS

<b>Executive summary .....</b>	<b>3</b>
Summary of submitters' views.....	3
<b>Introduction and background .....</b>	<b>6</b>
The Tomorrow's Schools Independent Taskforce Review .....	6
About this report.....	6
<b>Key Issue 1: Governance.....</b>	<b>8</b>
Summary of Taskforce's view .....	8
Overview of what submitters said.....	8
Submitters' views about recommendations 1, 2 & 3 of the Report.....	8
<b>Key Issue 2: Schooling Provision.....</b>	<b>13</b>
Summary of Taskforce's view .....	13
Overview of what submitters said.....	13
Submitters' views about recommendations 4 to 10 of the Report .....	14
<b>Key Issue 3: Competition and Choice .....</b>	<b>18</b>
Summary of Taskforce's view .....	18
Overview of what submitters said.....	18
Submitters' views about recommendations 11 & 12 of the Report.....	19
<b>Key Issue 4: Disability and Learning Support.....</b>	<b>22</b>
Summary of the Taskforce's view.....	22
Overview of what submitters said.....	22
Submitters' views about recommendations 13, 14 & 15 of the Report.....	23
<b>Key Issue 5: Teaching .....</b>	<b>24</b>
Summary of Taskforce's view .....	24
Overview of what submitters said.....	24
Submitters' views about recommendations 16 to 20 of the Report .....	24
<b>Key Issue 6: School Leadership .....</b>	<b>28</b>
Summary of Taskforce's view .....	28
Overview of what submitters said.....	28
Submitters' views about recommendations 21, 22 & 23 of the Report.....	28
<b>Key Issue 7: Resourcing .....</b>	<b>30</b>
Summary of Taskforce's view .....	30
Overview of what submitters said.....	30
Submitters' views about recommendations 24 to 27 of the Report .....	31
<b>Key Issue 8: Central Education Agencies .....</b>	<b>35</b>
Summary of Taskforce's view .....	35
Overview of what submitters said.....	35
Submitters' views about recommendations 28, 30 & 32 of the Report.....	35

## EXECUTIVE SUMMARY

This report summarises the submissions received on the Tomorrow's Schools Review Independent Taskforce's Report *Our Schooling Futures: Stronger Together, Whiria Ngā Kura Tūātitini* (the Report). The 2,983 submissions were received from the education sector, parents, and a range of other groups and individuals. These submissions, along with other feedback, have informed the Taskforce's final report and recommendations to the Minister of Education, Hon Chris Hipkins.

### Summary of submitters' views

Overall, submitters agreed with the primary motivating principles of the review, in particular the principles of equity and excellence for all learners in Aotearoa New Zealand. However, there was opposition from most submitters to the Taskforce's major recommendations for school governance changes. This was largely due to the lack of an evidence-supported rationale for these changes. Instead, submitters widely suggested targeted support for those groups identified as needing it. In addition, submitters considered that the issue of chronic under-resourcing of education was insufficiently addressed in the Report.

Below is the summary of submitters' views on key issues raised from the Report.

#### **Key Issue 1: Governance**

Submitters were largely opposed to the Taskforce's governance proposals. While many stated their support for the principles of equity and excellence in education, they could not see a pathway to this through the proposed Hubs (Hubs). Hubs were seen as re-centralising power, bureaucratic, costly and a threat to local autonomy. Many submitters advocated for an increase in direct school and teacher-level resourcing rather than system-level administrative change. Most felt that targeted support of struggling schools was desirable, while the majority of schools' governance remain unchanged.

#### **Key Issue 2: Schooling provision**

The majority of submitters agreed with having a state schooling network planning strategy, that best use should be made of school facilities, and that New Zealand should have an efficient schooling network. A significant number of submitters asked that early childhood education also be considered as part of the schooling network.

Submitters supported improved transitions for students, with responses focused on the data sharing aspects of this. Fewer transitions of schooling type were favoured, with only a minority supporting any form of middle school. The recommendation that some schools become full-service sites was generally favoured by those who commented. There was moderate support for designing flexible community-wide curricula, assessment and timetable offerings for schools, with some caution about a lack of core curriculum content driving inequity amongst students.

Views on a national Hub for Kaupapa Māori settings were mixed; some submitters felt that it could be the start of a parallel Māori medium education system developed by Māori, for Māori, with meaningful sovereignty, whereas others felt that it could represent a loss of autonomy, lack recognition of contextual differences and needs, and segregate Kaupapa Māori education within the education system.

Overall, submitters considered that the Taskforce's recommendations under this key issue lacked detail, particularly around resourcing and responsibilities, and was poorly connected to the Taskforce's overall aims. Additionally, many submitters reiterated that Hubs were not necessary to achieve the aims of the recommendations under *Schooling provision*.

### ***Key Issue 3: Competition and choice***

There was a high level of disagreement from submitters about the Taskforce's view of competition between schools. Submitters questioned the extent to which schools competed, and stated that what the Taskforce described was families choosing schools that best suited their children. A small minority of submitters agreed with the Taskforce's analysis and response.

Many submissions addressing key issue 3 came from the state integrated schools sector. These submitters were concerned that the Report did not address how state integrated schools would operate within the proposed Education Hub structure. Iwi representatives – and many other parents – were concerned about retaining parental choice in schooling.

The most common views included: donations to schools should remain uncapped; students enrolled in a state integrated school have the right to transport to their nearest state integrated school and thus differential subsidies may be required; and enrolment scheme ballots for non-preference students using the same criteria as other state schools are potentially problematic.

Submitters wanted an explanation of the recommendations relating to schools with international fee-paying students, and the level of attendance fees at state-integrated schools, as these recommendations appeared to be based on an inaccurate understanding of the current situation.

### ***Key Issue 4: Disability and Learning Support***

Submitters generally supported the Taskforce's recommendations relating to this key issue. Overall, submitters were focused on learning support needing significantly increased resourcing with easier and quicker access to support, including more direct support for schools, families and students. Many considered that this increase in resourcing should be a priority before any changes in governance were considered.

### ***Key Issue 5: Teaching***

There was strong support for many of the Teaching recommendations, although submitters generally felt that increased resourcing of the profession was a higher priority than structural and administrative change. Overall, submitters emphasised that teacher quality and teacher supply must be addressed through improved teacher education (ITE) and professional learning and development (PLD), appraisal, working conditions and remuneration.

### ***Key Issue 6: School leadership***

Centralisation of leadership development was broadly supported by submitters. Most submitters were in agreement with enlarging the Teaching Council to accommodate the proposed Leadership Centre, assuming that this was funded by the Crown. Across submissions, principal quality was associated with the quality of teaching and learning in schools, and therefore with student success. Compulsory, continuing education and supported leadership was regarded as a pathway to improved outcomes for students. The issue of inadequate or inappropriate pay at all levels of school leadership was repeatedly raised. Meaningful bicultural leadership developed by Māori, for Māori, was called for.

### ***Key Issue 7: Resourcing***

Submitters largely supported the principle of implementing an equity index as soon as possible, and prioritising increased equity resourcing to schools. However, submitters' responses suggested a need for greater clarity of both of these recommendations. There was broad support for the sharing of best practice about use of equity funding, although some questioned who would define best practice. It was also noted that this sharing already occurs. The majority of submitters were in favour of reviewing the allocation of staffing entitlements and management resources to ensure coherence across primary and

secondary schools. Submitters had mixed views on school network reviews being carried out, with some objection to the inference that small schools were not providing a quality education.

***Key Issue 8: Central Education Agencies***

Submitters supported the call for increased effectiveness and monitoring of central agencies, particularly relating to accountability for student learning and wellbeing. While there was support for reconfiguring the Ministry of Education and for the proposed Education Evaluation Office, there was also support for the improvement of existing structures, including increased resourcing of existing Ministry regional offices. The most common view was that any reconfiguration should only happen if it could be shown to improve outcomes for children, and was not simply “*change for change’s sake*”. Many submitters wanted more detail relating to the reconfiguration of central education agencies.

## INTRODUCTION AND BACKGROUND

### The Tomorrow's Schools Independent Taskforce Review

The Tomorrow's Schools Independent Taskforce was appointed by the Minister of Education in April 2018 to review the provision of compulsory schooling in Aotearoa New Zealand, with a focus on equity and excellence for all students. In their report, *Our Schooling Futures: Stronger Together, Whiria Ngā Kura Tūātitini* (the Report), the Taskforce made 32 recommendations under eight key issues.

Consultation on the Report took place from December 2018 to April 2019. People provided feedback through various channels including public meetings, an online survey, written submissions, voicemail and social media.

### About this report

2,983 submissions were received from a variety of submitters, including:

- parents, family and whānau
- iwi groups
- teachers/kaiako and principals/tumuaki
- school boards and individual board members
- proprietors of state integrated schools
- other education sector professionals and education sector groups
- community groups
- business groups
- interested citizens

Most submissions were from individuals, or from a group of individuals. School-related submissions included those from boards of trustees, groups of schools, proprietor boards, and groups of school staff. Submissions from organisations included Māori authorities, education sector groups and industry groups.

Submitters	Number
Individual(s)	2,565
School-related	269
Organisations	149
<b>Total</b>	<b>2,983</b>

### Analysis of the submissions

Submitters commented on the Taskforce's overall aims, the 8 key issues, and all or some recommendations. No discussion document was provided to guide submitters' comments.

The high level themes, key issues, and recommendations made by submitters were documented. Submitters' responses were included verbatim within the analysis framework, giving full access to people's comments and the capacity to collect direct quotes.

Submissions were summarised using a qualitative approach, aiming to represent the full range of submitters' views. The most common perspectives have been identified in this

report, but responses have not otherwise been quantified, as some submissions were from an unknown number of people or represented many people's views.

### ***Limitations of the analysis***

#### *The consultation process*

Submitters were generally critical of the consultation process, stating that:

- the terms of reference were too narrow
- stakeholder engagement was poor, particularly with tāngata whenua, and practitioners *“at the coal face”* of teaching
- there was a lack of genuine consultation (*“just forums to discuss what the panel had already decided on”*)
- the nature and duration of consultation was lacking (*“poorly advertised and too short”*)
- the Report did not provide sufficient evidence, analysis or detail to enable a comprehensive response from submitters.

#### *The summary of submissions*

While all data was included in the analysis, it was unavoidable that some of the breadth and complexity of views would be lost in drawing together multiple perspectives into a thematic summary. Similarly, the number of direct quotes in this Report was limited by the need for brevity. This increased the amount of interpretation required, and therefore, the possibility for unintentional dilution or misrepresentation of submitters' views. These risks were mitigated by analysts' familiarity with the data, and understanding of the context within submissions received.

## Key Issue 1: Governance

### Summary of Taskforce's view

The Report concluded that the *“Board of Trustees self-governing model is not working consistently well across the country”*. The Taskforce made three major recommendations in relation to governance, including: the re-orientation of Board of Trustee core responsibilities; establishment of Crown entity ‘Education Hubs’ (Hubs), for legal and governance purposes (replacing Ministry of Education regional offices with ‘delegation back to schools’ opportunities); and the establishment of an Education Evaluation Office to review Education Hub performance.

### Overview of what submitters said

Many submitters acknowledged there was uneven board performance in the self-governing schools model. However, submitters largely opposed the Taskforce's governance proposals. Most could not see that changes to school governance would achieve the aims of the review. Further, the proposed Hubs were widely perceived as re-centralising, overly bureaucratic, costly and a threat to local autonomy. Many described the Hubs as a retrograde step back to the pre-1989 Education Boards.

Further, some submitters considered that wider social determinants (e.g. racism and poverty) had major influence on educational inequities and these had not been effectively addressed by the Taskforce. System change was described as requiring long-term, political and cross-sector collaboration on ideals and policy that reflected bicultural and inclusive practice. This needed to happen without encroaching on individual agency and the ‘special character’ of diverse education groups. Recommendation 1 (described in more detail below) was largely rejected by the state-integrated sector due to the difficulty in seeing how the special character of schools would be upheld.

Many submitters advocated school and teacher-level resourcing in preference to broad, systemic-level administrative change. Most felt that targeted support of the 10% of schools who struggled within the current system was preferable, with status-quo governance for the majority. A ‘one size fits all’ approach to transformation was inadvisable given that the system was deemed to be working well for the majority.

### Submitters' views about recommendations 1, 2 & 3 of the Report

#### **Recommendation 1: Reorientation of Board of Trustee roles and responsibilities**

*“The current school governance system, with power in the hands of parent-elected school boards, works well for the majority.”*

Most submitters valued the community-led principles of board of trustee school governance, while acknowledging the functional challenges to boards to maintain appropriate skill-sets. Many submitters described well-functioning boards and the existing means boards have for obtaining support and assistance. There was a minority perspective that there were insufficient checks on the power boards could exercise, and criticised the relationship between the principal and boards.

Some submitters who agreed that there was a need for increased support for boards suggested the use of existing entities such as the Ministry regional offices. There was significant interest in a voluntary ‘opt-in’ approach to Hubs if they were created, giving schools the ability to delegate some responsibilities. Submitters were largely comfortable with board's opting for support with administration, property, finance and human resourcing. There was, though, some concern expressed about a “fractured approach” to educating students with property, finances, and so on, being separated from student achievement,



when in fact they contributed to student outcomes. Overall, submitters wanted boards to retain final approval relating to their responsibilities, irrespective of support for changes to governance.

A significant number of submitters were concerned that reorientation of the board role would reduce parents' interests in contributing as they would have such "*limited impact*", being merely a "*fund raising team*".

#### *Providing advice to the principal*

There was criticism of the proposal that boards should provide advice to the principal on localised curriculum and assessment practices. This was considered the one area that parent trustees would generally not have expertise in.

#### *The appointment of the principal*

Submitters were largely against boards relinquishing control of principal appointments, due to the critical role of the principal in schools. This proposal was very strongly opposed by the state integrated sector, many of whom considered that their position in the schooling network had been ignored by the Taskforce. Submitters generally acknowledged differences in board capability with principal appointments, but many pointed to existing mechanisms for support. A minority of submitters agreed with this proposal, stating that boards were not always well equipped to manage hiring principals.

#### *Student discipline*

Most submitters who commented considered student discipline should stay with boards as they knew the students and their circumstances. Further, the proposed Hubs having responsibility for advocating for parents and students, and student discipline, was deemed to be a conflict of interest. A minority of submitters considered that boards were not always well equipped to manage student discipline, and there needed to be more oversight of this process.

#### *Mana whenua representation on Boards*

Mana whenua representation on boards was broadly supported, yet some submitters questioned the practicalities of implementation. People wanted to avoid tokenism. In addition, in some areas mana whenua status would be contested and may result in conflict.

#### *Student representation on Boards*

The Taskforce recommended that the student representative composition on boards should be reviewed to ensure greater opportunity for student voice. Submitters largely interpreted this as having a student representative(s) on the board and views on this were mixed. Some considered it an unrealistic idea that was unfair on the student(s), and recommended that boards explore other ways to ensure the student voice is heard. Others thought that reorientation of the board role would enable school boards to seek more meaningful student participation in decisions about their daily experiences in school. Similarly it was suggested that, if established, "*Hubs should be required to have meaningful student input to decision-making.*"

### *Board members' fees*

Few submitters commented on the Taskforce's recommendation that board members' fees "*should be reviewed to properly acknowledge their work and contributions*". There was agreement based on the many hours some board members put in, but also disagreement due to concern that "*allowing pay to become a motive for joining a Board of Trustees may attract the wrong people for the wrong reasons.*"

### *Rationale for changes to Board governance*

Overall, submitters generally could not see the link between the suggested changes in governance and the creation of excellence and equity in education. There was also widespread concern about threat to local autonomy and to the special character of integrated schools. Submitters described the value of voluntary labour contributed by board members, and what it would cost the government to account for this extra expense if board input into schools was reduced.

People asked for:

- a logical rationale for the proposed changes supported by research and evidence;
- evidence that changes to board roles would improve student experience in all schools, including those already well-functioning;
- clarity about how board re-orientation would improve inclusivity and diversity;
- a detailed strategic implementation plan including costings, roles and responsibilities, and delegation of portfolios between Hubs and boards; and
- solutions to deal with the identified issues, rather than whole-system change.

### **Recommendation 2: Education Hubs**

*"I do not want a Hub that will tell my school what to do. I do not want our Principal and Teachers to be taken away from our school by others. Our school has programmes to suit our community and I do not think people outside our community will know what is best for our children."*

*"Education Hubs are one way of ensuring the leadership of learning across a network of schools rather than the current system where some schools try to enhance their reputation by doing something unique that they then do not want to share."*

The Taskforce's recommendation to establish Hubs contained numerous sub-recommendations describing: how Hubs would be organised and governed; what the Hub roles would be; and their relationships with principals, teachers, boards, the Ministry and broader sector networks.

There was an enormous response to Recommendation 2, with submitters mainly opposed to the creation of Hubs. Some submitters commented on all or most of the sub-recommendations, other responses were more focused at the ideological level. The state-integrated schools sector was particularly opposed to Hub establishment. These submitters were concerned about the impact that situating the board and Proprietor functions within Hubs would have on the special character of their schools, assuming this was what was intended. Many of these submitters thought that the recommendations simply had not considered the legal position of state-integrated schools. Overall, the most common view was that status quo governance was working for the majority. If established, Hub

involvement should be on a voluntary, opt-in basis. Some submitters were in favour of compulsory Hub 'membership' for schools that were performing poorly.

Key reasons why submitters opposed Hubs included:

**Lack of evidence** – Submitters thought strongly that the Taskforce had not presented evidence to support major change to school governance, or set out the logical connection between the proposed Hubs and improved student outcomes. Submitters thought that the advantages and disadvantages of the Hub model had not been fully discussed in the Report. Trial Hubs were advocated by some submitters who felt that if they were to go ahead, they must first be robustly piloted. Submitters also thought that there should also have been discussion around the use of existing structures and entities, for example Kāhui Ako/Communities of Learning, to achieve the aims of the proposed changes.

**Cost** – Replacing 10 Ministry regional offices with 20 Hubs would be costly and achieve little. Many submitters asked how the Hubs would be funded and whether any school's resourcing would suffer as a result of funding the Hubs. Submitters advocated for improved student outcomes through increased school-level resourcing rather than creating Hubs.

**Increased bureaucracy** – Many submitters stated that increased bureaucracy and managerialism would result from the recentralising of power involved in the Hub model, leading to disempowerment of schools and communities. Hubs were frequently compared to the former Education Boards ("*bloated bureaucracies*"). Submitters questioned whether establishing Hubs was a backward step to more centralised governance which "*kept business, parents and the community at arm's length*". A small number of submitters pointed to the District Health Board model to illustrate why Hubs would not work ("*huge operational costs, layers of managers disproportionate to the number or medical staff, properties that are poorly managed and significant variance in the performance of the different DHBs*").

**One size fits all** – The Hub model was widely and negatively characterised by submitters as "*one size fits all*". Submitters questioned the point of changing the governance of well performing schools. Many submitters considered that the establishment of Hubs would result in poorer performance across all schools.

**Size of Hubs** – Most, if not all, the submitters agreed that the inclusion of 125 schools within a single Hub, irrespective of geographical considerations, was flawed. This view is shared by the minority who supported Hubs.

**Ministerially appointed directors** – There was opposition to the proposal that Hubs be governed by a ministerially appointed group of directors, as this risked Hubs carrying out politically motivated agendas.

**Principal employment** – There was overwhelming opposition to the proposal that Hubs would provide principals with ongoing employment and appoint them to a particular school on a five year contract. This opposition was centred on the negative impact on principals personally, and on schools and thus students. Submitters strongly stated that principal (and teacher) secondment to Hubs or other schools be a voluntary opportunity, and not enforced.

**Staffing** – Hubs would worsen existing teacher and principal shortages.

Submitters criticised the lack of implementation detail and asked numerous questions, relating to the topics listed above, and also:

- How will mana whenua/iwi representation on Hubs be organised?
- Are Hubs being tasked with too many functions?

- What will the dispute resolution process between Hubs and schools, and the Ministry and Hubs, look like?

### *Support for Hubs*

The minority of submitters who supported the proposed Hubs generally had strong views about the requirement for overarching structural change. This included some iwi submitters who advocated for co-design of Hubs be underpinned by Te Tiriti o Waitangi. For example, the conditional agreement with Hubs should be subject to the establishment of a Māori Education Authority with oversight of Hubs. Support for Hubs was often linked to small, rural and low-decile primary schools that could struggle to attract high quality staff and boards.

### **Recommendation 3: Hub oversight and accountability**

*“For sector buy-in, independent oversight of its [Hub] implementation over a reasonable timeframe is essential, as is time to engage in the process.”*

Submitters commented much less on Hub oversight by an Education Evaluation Office (Recommendation 3), than on the Hub concept more generally. This may be due to the high level of opposition to the establishment of Hubs.

Of those who did comment, there was general agreement that Hubs should be required by an independent entity to be *“held to the highest standard of performance”* (Taskforce Report, p.54). People suggested that an Education Evaluation Office:

- should have a school advisory role
- ensure review of Hub performance remains ‘evaluative and developmental’, rather than become a tick-box audit process
- conduct evaluations that are *“relationship-based, high support and high challenge”*, rather than *“name, blame and shame”*
- use relationship-based evaluations rather than a suggested KPI-centred system
- should be independent of the Ministry
- must have capacity to receive feedback from students and parents.

There was suggestion of establishing an independent Education Commissioner. People queried why existing structures, such as the Ministry or Education Review Office, could not have their roles expanded to take on the proposed roles of this new entity. There was consideration of having Māori representation within the Education Evaluation Office in order to *“enable greater accountability with reporting and data”*. Some submitters asked for more detail around how the proposed Education Evaluation Office would respond to poor performing Hubs.

## **Key Issue 2: Schooling Provision**

### **Summary of Taskforce's view**

The Report described current schooling provision as not meeting the needs of many children and young people. While some schooling provision had become more diverse and responsive to the needs of students, parents, whānau and the wider community, Kaupapa Māori pathways were limited and not well supported. There was limited support for the teaching of Māori and Pacific languages. The Taskforce's recommendations were aimed at making schooling provision more flexible, supporting the teaching of te reo Māori and Pacific languages, and enhancing digital infrastructure and provision. The recommendations were also aimed at ensuring public resources are used as efficiently as possible.

### **Overview of what submitters said**

Submitters' responses to this key issue were concentrated on Recommendation 5 (the formation of a Hub for Kaupapa Māori settings), and Recommendation 7 (relating to year level schooling models).

The majority of submitters agreed with having a state schooling network planning strategy, agreed that best use should be made of school facilities, and that New Zealand should have an efficient schooling network.

Views on a national Education Hub for Kaupapa Māori settings were mixed: it could be the start of a parallel system developed by Māori, for Māori with real autonomy; or it could represent a loss of autonomy, lack of recognition of contextual differences and needs, and segregation of Kaupapa Māori education within the education system.

Submitters supported improved transitions for students, with responses focused on the data sharing aspects of this. Fewer transitions in schooling were favoured, with a minority supporting a form of middle schooling.

The majority supported schools becoming full-service sites. There was general support for making better use of school facilities but submitters questioned whether infrastructure wear and tear, management, and so on, would be reflected in increased resourcing.

There was moderate support for designing community-wide flexible curriculum, assessment and timetable offerings for schools. However, some submitters cautioned that the lack of core curriculum content will lead to inequity amongst students. Submitters' views varied on the recommendation to use digital infrastructure and delivery options more intensively. It was generally agreed that there was potential for Te Kura to have a greater role in the provision of flexible schooling, curriculum and timetabling for all students, but this should be part of a wider investigation looking at how the proposed Hubs (if they went ahead), Te Kura, Virtual Learning Networks and other schools would work together to provide this. Submitters made little comment about enhancing and incentivising school and tertiary programmes, as this recommendation was unclear. Submitters also thought more detail was needed about the use of just-in-time assessment badging and micro-credentialing.

Overall, submitters considered that the Taskforce's recommendations for this key issue lacked detail, particularly about resourcing and responsibilities, and were poorly connected to the Taskforce's overall aims. Additionally, many submitters considered that Hubs were not necessary to achieve the aims of Recommendations 4 to 10.

## Submitters' views about recommendations 4 to 10 of the Report

### ***Recommendation 4: A Te Tiriti o Waitangi-led, future focused state schooling network planning strategy be developed by the Ministry alongside the Education Hubs***

Having such a strategy – not necessarily involving Hubs – was largely supported by submitters but often without further discussion. The purpose of a schooling network planning strategy was unclear to some, while others said it did not address the under-resourcing of schools. There were many questions about how this strategy would work, with some submitters using expressions of 'strategy fatigue', and others raised that local development of national strategies is needed.

There was conditional support for the strategy "*if it underpins structural and cultural transformation for Māori learners*" and involved genuine power sharing relationships (noting that iwi had education plans that would need to be integrated into such a strategy). Others were not convinced that a strategy would be sufficient to drive the necessary transformation for Māori learners. It was suggested that the articles of Te Tiriti o Waitangi (Māori version) needed to be formally acknowledged through legislation and policies to ensure the systemic transformation required. A few submitters were not convinced that a Treaty-led approach was consistent with principles of partnership. In relation to achieving aims, it was noted that while Crown and iwi relationships have strengthened and become more strategic over the last 25 or so years, in that same period outcomes for Māori in schooling have not improved.

Some submitters considered the Taskforce was hostile to small, state-integrated and single-sex schools, stating that the state-integrated sector was suppressed through not allowing maximum roll increases or the opening of new schools. These submitters called for a more explicit statement of the Taskforce's position on state-integrated and single sex-schools. Some submitters from the integrated schools sector also suggested having a separate Hub to work with their particular network of schools.

### ***Recommendation 5: A dedicated national Education Hub for Kaupapa Māori settings that provides a strong and coherent parallel pathway within the overall network***

Many submitters emphasised their support for universal access to te reo Māori and Māori history, noting much more resourcing was required to provide qualified teachers in this area. Views on a national Education Hub for Kaupapa Māori settings were mixed. On the one hand, a proposed Kaupapa Māori Hub could be the birth of a parallel system with real autonomy developed by Māori, for Māori; on the other hand it could represent a loss of autonomy, lack of recognition of contextual differences and needs, and segregation of Kaupapa Māori education within the education system. Submitters asked what mechanisms there would be to ensure a dedicated Kaupapa Māori Hub was not siloed from other Hubs. There were also calls for a separate Māori medium Hub, a separate Kaupapa Māori English medium Hub, the establishment of a parallel pathway of development specifically for Kura Kaupapa Māori Te Aho Matua, and for multiple Hubs for Kaupapa Māori settings nationally.

Submitters, regardless of whether they agreed with the recommendation or not, thought that: the definition of Kaupapa Māori settings in the Report was not clear; Hubs were not necessary to deliver support to Kaupapa Māori settings ("*Kaupapa Māori settings have grown in the Tomorrow's Schools environment*"); and the structure and function of an overarching organisation for Kaupapa Māori settings should be for Kura Kaupapa Māori to determine. Additionally, the vast majority of Māori students were in mainstream education and efforts must also be made there to reduce inequities in education outcomes.

Other points submitters raised included:

- the emphasis on language in this recommendation overlooks the largely European pedagogical approaches in schools

- the prioritisation of support for Pacific languages should not sit under this recommendation (*“Pasifika languages should be supported as a separate recommendation and recognised as important in their own right, not as a sub-set of Māori education”*).

***Recommendation 6: Work is undertaken to ensure that student transitions between schools or providers are seamless as they progress through the education system***

Submitters supported improved transitions for students, but noted that a lack of detail around this recommendation limited their ability to comment. Most submitters who provided feedback focused on data sharing that supported seamless transitions. There was widespread support for a single student management system, with some saying the Ministry of Education should provide this as schools currently pay for their own student management systems. Submitters thought there was a real opportunity for significant improvement in the depth, nature and use of student data. However, submitters were also cautious about what information is shared and why (*“information should be used exclusively for teaching and learning, including learning support needs – not data which might later limit students’ opportunities”*).

Other points submitters raised included:

- this recommendation should include transitions from early childhood education to primary education and from secondary education to tertiary education
- there should be more emphasis on smoothing transitions between schools for students who move frequently
- seamless transitions require uniformly high quality teaching and a curriculum that is applied consistently across schools
- seamless transitions are already being provided within Kāhui Ako.

***Recommendation 7: Establishing a schooling model based on: primary schools (Years 1-6), middle schools (Years 7-10), and senior colleges (Years 11-13); or full primary schools (Years 1-8) and secondary schools (Years 9-13); or composite schools***

Submitters largely favoured fewer transitions in schooling, i.e. no middle schooling, however there was no clear preference for a particular structure of a primary/secondary model. Numerous submitters questioned why any form of middle schooling was suggested when the Taskforce’s aim appeared to be reducing transitions. Many questioned why a Years 1-6 then Years 7-13 model was not also suggested as an option.

Objections expressed about the various models included: a general course to Year 10 would not improve academic achievement; middle schools were unlikely to attract teachers with high levels of academic expertise; a senior secondary school would be empty for most of Term 4 – or populated only by students taking internally assessed subjects; and the innovations the Taskforce highlighted for senior levels do not require a senior college model (differentiated school hours and mixing in-school learning with external opportunities).

A minority of submitters supported a form of middle schooling stressing the importance of varying stages of emotional and cognitive development and the need for separate, specialised teaching and learning environments. This included a small number of submitters in favour of retaining 2-year intermediates, and a small number of submitters in favour of senior colleges.

Other approaches to structuring schooling years were also suggested. For example, a hybrid model where a primary is formally partnered with an intermediate which would be co-led and develop a singular pathway. Another example is permeability within year levels, *“taking a tuakana/teina approach”*. It was also suggested that the Ministry take the opportunity to address the *“dichotomy of purpose between secondary and primary schooling”*.

Many submitters had concerns about the lack of research evidence pointing to the success of any particular structure, with some not convinced that a particular structure of schooling provision was critical to successful transition or successful schooling more generally. Changes to the schooling model was expected to be very costly and not regarded as a priority (although it was suggested that *“new models could be used where new schooling was being built with strong community input”*). Submitters also questioned who would decide on the model, whether it would be a national model or varied across different areas, and what would happen to specialist education programmes that have a preferred year level model.

***Recommendation 8: National guidelines are developed for schools to become full-service sites that offer extensive wraparound services in socio-economically disadvantaged communities***

Submitters generally supported schools becoming full-service sites and some submitters wanted them in all communities. Most submitters thought that full-service sites meet student needs and provide connections across social service providers. Reasons that were raised for not supporting full-service sites were related to concerns about the loss of focus on schools as academic institutions.

There were many questions that submitters raised around the detail of this recommendation:

- What services would be provided?
- How would disadvantaged communities be defined?
- Would there be a risk of stigma being attached to those schools that became full-service sites?
- Who would be responsible for the management and administration of extensive wraparound services?
- Would the various arms of government be mandated and resourced to collaboratively fund and/or provide integrated services on school sites?

***Recommendation 9: Hubs, working with schools and communities, design community-wide flexible curriculum, assessment and timetable offerings for schools***

There was moderate support for this recommendation, but noting that Hubs were not necessary to achieve this. Submitters were concerned that locally responsive curricula were or would lead to a widening gap in students' knowledge (*“we need clear powerful content knowledge – rich curriculum; there should be consistency of a core curriculum as well as locally responsive curricula”*). There were also questions about who would design curriculum and assessment offerings (*“curricula need to be co-constructed with mana whenua”*). Submitters also asked how this recommendation aligned with Recommendation 1 that boards are responsible for strategic planning, curriculum and assessment practices. Use digital infrastructure and delivery options more intensively

Submitters' had differing views on whether this recommendation required intensive use of digital infrastructure and delivery options. Many submitters agreed that digital delivery could be used more, and not simply for 'digital technology' as a subject, but integrating technology



into subject teaching. It was also noted that this was already happening in some schools (the Taskforce's 'limited mention' of Virtual Learning Networks was noted), and that there was a need for IT infrastructure improvement in rural areas.

However submitters were cautious about this recommendation because digital delivery is not (yet) a replacement for quality face to face teaching, and digital delivery should not be used as "*educational entertainment*". Academic research relating to digital learning was "*not encouraging*". A particular concern was that digital learning promoted "*hyperindividualisation*" at odds with the aims of the Taskforce's Review. One submitter suggested that New Zealand needed a single national provider or central repository for designing rich online learning modules. This would support and diversify educational opportunities for students and teachers both in and beyond school.

*Enhance and incentivise school and tertiary programmes, especially in senior schools.*

Submitters made little comment about this recommendation, with some questioning what it meant. A question raised was whether this recommendation referred to School and Tertiary programmes, otherwise known as Trades Academies. The recommendation was vague and would be difficult to achieve as schools were "*hamstrung by Ministry policies about when a student is a student and when they are not*". While enhancing these programmes could be advantageous it would need to avoid being highly prescriptive and lead to "*labelling*" of possible pathways for individuals.

*Encourage the use of just-in-time assessment badging and micro-credentialing.*

Submitters noted that this was already in place in some schools, while others questioned the quality and value of micro-credentials in relation to employment opportunities, and asked who these micro-credentials were aimed at. There was also the question of who would have responsibility for developing micro-credentials. Some submitters felt that more detail was required about this recommendation.

*Make better use of school facilities by students and the community throughout the day and at weekends.*

Most submitters were positive about this recommendation because it was 'sensible' to make best use of facilities and it was seen to offer opportunities to connect communities, such as use of evening classes. However submitters saw the potential for downsides, with security and management issues, including health and safety, and extra work for teachers (e.g. putting material away in classrooms). Some submitters also questioned whether the infrastructure wear and tear, management, and so on, would be reflected through increased resourcing. It was suggested that boards of trustees were better placed to decide what could be available to the community.

***Recommendation 10: An investigation into the role of Te Kura***

Submitters generally agreed that there was potential for Te Kura to have a greater role in the provision of flexible schooling, curriculum and timetabling for all students, and agreed that Te Kura's specialist expertise could be better incorporated into the schooling network. However submitters noted that Hubs were not necessary to achieve this. There were also questions about what would change with national institutions such as Te Kura if Hubs were created.

Te Kura, in their submission to the consultation, stated that they could see the huge potential for more learning to be supported through digital technology and that work is currently

underway that supports this recommendation. However some submitters were sceptical that Te Kura had the capacity and capability to reframe online learning. Many noted that Te Kura was currently underutilised due to costs and enrolment criteria and that significantly more resourcing was required for Te Kura and Virtual Learning Networks to enable them to realise their potential across all sectors (e.g. Kaupapa Māori, Alternative Education, etc.).

Submitters suggested that the investigation should have the aim of increasing choice and giving wider access to a greater range of the curriculum and extending students, particularly in remote and small schools. The question was raised how the schooling network could best support all students. Some submitters were concerned with the suggestion that Te Kura is a school of choice for at-risk students, due to the potential for vulnerable students to disengage from society completely (*“Te Kura support needs to be ‘and-and not and-or’”*). Submitters also asked who makes the decision that a school would have their students taught by Te Kura.

It was suggested that any investigation into the role of Te Kura be widened to examine the interplay of the proposed Hubs, Te Kura, Virtual Learning Networks and other schools so that a coherent and responsive selection of flexible learning opportunities was made available to students. There was also suggestion that evidence from previous investigations into the role of Te Kura should also be re-examined.

### **Key Issue 3: Competition and Choice**

#### **Summary of Taskforce’s view**

The Taskforce found that it was difficult to ensure there was good schooling network planning and use of resources. They also found it could be difficult for families to make decisions about schools based on suitability for their children, instead of being based on possibly inaccurate perceptions of quality. The Taskforce noted the concentration of students in disadvantaged circumstances in some schools, which reduces the students’ likelihood of success. The Taskforce’s recommendations were aimed at each proposed Hub having a planned network for schools and the responsibility for schooling in its area, including making sure that Māori immersion pathways were available. The recommendations aimed to improve the quality of all schools and to reduce the variability in quality between schools, with the aspiration that every local school is a good school.

#### **Overview of what submitters said**

Recommendation 11 contained numerous sub-recommendations. Submitters responded most strongly to the Taskforce’s description of competition between schools, and recommendations relating to enrolment schemes, maximum roll numbers, donations and international students. Overall, there was a high level of disagreement from submitters about the Taskforce’s view of competition between schools. Many submissions addressing this key issue came from the state integrated schools sector who were concerned that the Taskforce did not acknowledge binding Integration Agreements. Iwi representatives were also concerned about access to special character schools. Submitters most commonly supported parental choice and upholding existing rights.

## **Submitters' views about recommendations 11 & 12 of the Report**

Recommendation 11 is separated into sub-recommendations. Submitter feedback to these recommendations are below.

### *Each Hub has a planned network*

Views were mixed from the few submitters who commented directly to this recommendation. Some submitters endorsed this (with or without Hubs), while others noted that the Ministry of Education already managed a planned network of schools. Some iwi authorities supported it with the *"inclusion of mana whenua, whānau or iwi endorsed representation on the decision making panel"*. Many submitters asked that early childhood education be included in the networks.

### *Competition between schools*

Submitters mostly disagreed with the Taskforce's view of competition between schools and their recommendations. The major themes expressed by these submitters were:

- the Taskforce had not provided evidence of competition or of the detrimental impact of competition
- what the Taskforce was describing was families choosing a particular school that best suited their child
- removing parental choice would result in an increase in private schooling, thus increasing social division
- while some submitters agreed that ideally all or most students would simply attend their local school, whether or not 'failing' schools would be improved (and how quickly) by the Taskforce's proposals was unknown.

A minority of submitters agreed with the Taskforce's analysis and response. Those submitters described schools in a spiral of decline and agreed that having some schools in decline had a negative impact on their wider community.

Several submitters discussed the drivers and impacts of school 'success and failure' at length from an economics perspective. These submitters found the Taskforce's evidence and analysis of the issues lacking.

### *Enrolment schemes reviewed and adjusted as necessary*

Submitters generally acknowledged that best use should be made of schooling infrastructure. However there was strong opposition to the idea that parents might be compelled to send their child to a school that was not their choice. For example, enforcing geographic zones around state schools might limit parents' choice of a single-sex school for their child. Enrolment schemes (zones) were therefore considered more problematic for secondary schools than primary schools. Many submitters thought that state-integrated schools could not have zones as geographically restricted as state schools. Submitters thinking about the Māori voice in this consultation emphasised agency (*"mana whenua must have input into any enrolment schemes employed by schools within their takiwa"*).

There was a small minority view that zones should be enforced for the wider good, or that schools should not be funded for out-of-zone students. However, some submitters noted that all schools *"would not instantaneously be good schools"*, therefore there must be flexibility

for some students, particularly those with additional learning support needs “as there may be specific benefits to a child attending a particular school due to the nature of the programmes offered” or for students wanting to make “a fresh start”.

Other points submitters raised included:

- there are environmental and health impacts from commuting past local schools
- parents’ workplace rather than home address should be considered in enrolment schemes
- a single model should not be imposed nationally as there are distinct differences between geographical areas.

### *Maximum roll numbers*

Maximum roll numbers were commented on largely by the integrated schools sector. These submitters noted that the notion of an agreed maximum roll between the proprietor of a state integrated school and the Minister of Education is a longstanding and accepted practice; and when the Ministry approves maximum roll applications, they consider the network provision of state schools.

Submitters asked that maximum roll levels take into account both demographic growth and the parental choice to change communities who wish to access a special character education for their children. Submitters asked that an increased roll be granted if preferential students were to be denied attendance. Submitters also note that any changes must be negotiated with, and agreed to, by the proprietor of the state-integrated school, rather than determined by the proposed Education Hub alone.

Other points submitters raised included:

- if integrated schools were not able to enrol non-preferential students, there would be an argument for removing any maximum roll
- the integrated school network had been blocked through not allowing maximum rolls to be reviewed or new schools to open
- mana whenua, whānau or iwi endorsed representation must be on any decision making panel.

### *An upper limit on the donations state schools can ask of parents*

Submitters mainly held the view that donations are voluntary, and if families were willing to pay they should be allowed to. These submitters noted that all forms of donations provided resources and opportunities for students and if removed, would push up compulsory fees or reduce student opportunities (e.g. school nurses, music and arts programmes and teacher aides).

Submitters associated with integrated schools noted that donations were used to enhance the special character of integrated schools. It was also noted by the state-integrated schools sector that there were already limits on what Attendance Dues and Policy One funding<sup>1</sup> could be spent on. Donations were therefore a key way that integrated schools could fundraise for capital improvements. It was further noted that parents have demonstrated support for the provision of special character professional development for teaching staff.

---

<sup>1</sup> The Ministry provides proprietors of state-integrated schools with funding to modernise and upgrade their integrated school property. Known as Policy One funding, it fulfils a similar purpose to the 5 Year Agreement (5YA) funding the Ministry provides to state schools.

## NOT GOVERNMENT POLICY

This was a provision that Hubs were assumed not to support, therefore the quality of special character education would be weakened if there were an upper limit on donations.

Some submitters suggested that if pressure on parents was an issue then the voluntary nature of donations should be made clearer. A few submitters questioned the intention of limiting donations (*“seems to be designed so that no school can provide an education service which is seen to be too high”*).

A minority of submitters agreed with capping donations, or suggested schools not ask for donations. These submitters acknowledged schools’ problematic dependence on donations and other fundraising, and strongly stated that increased central resourcing would be required.

Other points submitters raised included:

- a cap on donations appears to be contradicted by proposals relating to equity funding which *“seem to assume that parents who are better off can support their schools by paying donations”*
- the relationship between donations and school competition and choice is not clear.

*Schools with international fee-paying students should demonstrate to the Education Hub that they can cater for these students’ needs independent of their government funding*

A very small minority of submitters agreed with this recommendation, based largely on the differing capacity of schools to attract international students. Most submitters thought that more detail was required as there was no explanation for this recommendation within the Report. Some submitters did not understand the recommendation as schools did not receive government funding for international students. Further, expecting schools to pay for building of new facilities solely for international students, for example, *“shows a lack of understanding of the complex logistics of running a school”*.

Submitters generally rejected the inference in the Report that enrolling international students was purely about fundraising. This was considered to ignore the broader learning and cultural understanding within schools, and New Zealand communities, that international students bring. Submitters also stated that the income from international students had made a significant and positive impact to the learning opportunities for domestic students.

*Transport subsidies for students attending state-integrated schools*

This recommendation was generally thought by submitters representing the state integrated schools sector to withhold *“reasonable regard”* for parents’ preference to enrol their children in an integrated school and, if implemented, would be in breach of the Private Schools Conditional Integration Act 1975 (now in the Education Act 1989). The majority view was that students enrolled in a state integrated school have the right to transport to their nearest state integrated school. Additionally, whānau should not be penalised for wanting their taitamariki to attend iwi or Kaupapa Māori specific schools. *“There should be equitable access to services and transport for those wanting to attend Kaupapa specific schools.”* The minority view was that state-integrated schools should be treated in the same way as state schools with regard to the operation of transport subsidies.

### *Enrolment scheme ballots for non-preference students*

This recommendation was considered potentially problematic by the integrated schools sector as students with a connection to a school, and who are classed as non-preference were enrolling through a ballot scheme, may miss out to others who have no connection to a school. (It was noted that balloting was only required if there were more non-preference applicants than places available.)

Submitters also questioned why other options were not explored. For example, it could be argued that non-preference positions be determined according to: the student and their family's level of commitment to a special character education; the distance of the students' residence from the school; and the date when the student first applied to enrol.

Some submitters supported this recommendation on the basis that all schools should use the same criteria.

### *Attendance fees*

Submitters from the integrated schools sector noted that:

- collection and use of attendance fees was nothing to do with the schools and was solely the domain of the proprietor in state integrated schools
- attendance fees were approved by the Ministry, audited annually, and the amount cannot be increased without Ministry consent.

This recommendation was considered an example of a low trust model. It was also noted that it would not be practical for national proprietors working across New Zealand to deal with a range of Hubs.

A small minority of submitters supported this recommendation with several providing examples of integrated schools misusing attendance fees.

## **KEY ISSUE 4: DISABILITY AND LEARNING SUPPORT**

### **Summary of the Taskforce's view**

The Taskforce found that the main issues around student disability and learning support were: many students and their families felt unwelcome to enrol at their local school and once enrolled, support is fragmented and not always available; support takes a long time to arrive; and principals and boards are faced with impossible choices. The Taskforce's recommendations aimed to build on the Ministry of Education's new Learning Support Delivery Model, and the draft Disability and Learning Support Action Plan.

### **Overview of what submitters said**

Recommendations 13 and 15 contained numerous sub-recommendations about the Ministry and proposed Hub roles. Submitters largely concentrated on Disability and Learning Support needing significantly increased resourcing with far easier access to support and more direct support for schools, families and students. Many considered that increased resourcing should be a priority, before any changes in governance were considered.

## **Submitters' views about recommendations 13, 14 & 15 of the Report**

### ***Recommendation 13 & 15: The Ministry and Hub roles***

Submitters supported the Taskforce's aim of trying to improve the issues identified in key issue 4 of the Report. However, it was widely considered that the Report did not explain how the proposed governance structure and roles would address these issues, instead *being "more a conceptual statement about making things better"*. Submitters strongly stressed the need for increased resourcing, and expressed concern that workforce issues were not addressed (e.g. the unavailability of specialist staff and regional workforce issues).

Some submitters emphasised taking a rights-based inclusive approach, supported by a legislative framework. These submitters were concerned that the Taskforce used a medical or deficit model, and had separated these issues into one chapter within the Report. (*"Inclusive education and disability rights do not belong in a section on their own as if there is a separate, siloed knowledge base and system of 'learning support' that is only for disabled students."*) Iwi representatives wanted to co-construct *"what inclusion is in theory and what it looks like in practice for whānau"*.

Submitters generally agreed that improvements in teacher training and professional learning and development were required to enable the full intent of inclusive education; however some submitters questioned whether every teacher is expected to teach all things to all people. There was some support for specialist classes within schools or for specialist schools.

There were many criticisms about the current level of Ministry of Education responsiveness and a few submitters questioned the recommendation that the Ministry continue to lead national strategy and policy (*"too many ill-informed managers directing too few experienced and at-the-chalk-face field staff with impractical and impossible policies and practices"*).

Some submitters reiterated that Hubs were not required as additional resourcing expertise and support could be provided within current systems. There was also concern about contestable funding in different pools (*"not the most effective use"*), additional bureaucracy, sufficient resourcing for all Hubs to have the number of specialists they need, and locating resources closer to schools. Rural schools questioned whether a Hub employing specialist staff and a pool of teacher aides was a practical option in rural areas.

Submitters welcomed clear roles, pathways and support for teacher aides with more secure employment through Hubs. However, there was also criticism that most teacher aides would still be in insecure employment through schools' operations grants.

Submitters pointed to a number of areas that were not addressed in the Report or were insufficiently addressed:

- support for gifted and talented students
- the importance of cultural awareness in diagnosis and support
- early intervention, starting in early childhood
- the need for fluid interaction between health, education and social services for funding, services and support
- learning support for children who have been excluded/stood down from school
- reference to enabling good lives for school leavers
- the list of specialists that Hubs would employ was incomplete (page 85 in the Report).

***Recommendation 14: Every school having a designated Learning Support Coordinator***

Submitters broadly agreed with this recommendation, noting that allocation must match need, for example, larger schools may need more than one coordinator. Submitters noted that the Report did not address the lack of skills within the current workforce to fill these roles, or the lack of incentives in small schools where there were limited management units for staff to take on these roles. One submitter noted that having the full-time teacher equivalent allocation would be preferable.

## **Key Issue 5: Teaching**

### **Summary of Taskforce's view**

The Taskforce identified that within schools, teaching quality had the most impact on student outcomes. Yet the approach to national workforce strategy and teacher professional support was incoherent. The paraprofessional role was also undervalued and underdeveloped. Collaboration pathways across and within schools were poorly defined and not functioning well.

### **Overview of what submitters said**

Submitters responded to the Report with views broadly related to the five recommendations made under key issue 5. Whilst there was strong support for many of the recommendations, submitters generally felt that increased resourcing of the profession was a higher priority than funding structural and administrative change (*"the status of the teaching profession needs elevating and like it or not, salaries are crucial in this. The proposed Hubs will not address this fundamental issue"*). Overall, submitters felt that teachers were overworked, underpaid and that the profession was in crisis.

The Taskforce's proposals for teacher and principal secondment to Hubs were highly controversial, given the current practitioner and skills shortage in the sector. People felt secondments to the Hub would take good teachers and principals out of schools where they were needed. The state-integrated sector was deeply concerned about the effects on special character of seconding practitioners out of schools. Many submitters favoured developing existing collaborative structures such as Kāhui Ako rather than developing new approaches through the proposed Hubs.

### **Submitters' views about recommendations 16 to 20 of the Report**

#### ***Recommendation 16: Workforce strategy***

Submitters felt that teacher education in Aotearoa was of variable quality, with little support for beginning teachers. Submitters also felt there was a crisis in quality teacher supply.

Submitters broadly supported the following recommendations:

- the establishment of a robust future-focused workforce strategy
- a culturally-responsive pedagogy within Initial Teacher Education more broadly
- raising the status of the teaching profession
- incentivising diverse and quality teacher trainees
- development opportunities for paraprofessionals



- improving quality assurance in teacher education (ITE and PLD)
- appropriate resourcing of individuals and the sector, such as paying educators more and improving work conditions.

There were mixed views of the recommendation that beginning teachers receive guaranteed employment. Whilst some considered that this would incentivise new teachers, others questioned why the teaching profession would take this step (other professions do not), how it would be implemented and what would happen if a teacher was found to be incompetent (*“will schools be forced to take on and retain these staff?”*). Some suggested that the Ministry should target teacher training to address the actual national shortages of the time.

There was moderate support for more flexible initial teacher training. Regarding a school-based model, most who commented believed that new teachers should not be placed in classrooms untrained and/or unsupervised, and that the essential role of teacher mentors needed to be acknowledged. Successful shared teaching models were highlighted, such as the Auckland Beginning Teacher Project and the Manaiakalani Digital Teaching Academy. About an equal number of responses were in favour of, and against, ‘apprenticeship-type’ teacher training. Submitters also asked for a simpler means for former teachers to re-enter the profession.

Submitters commented on gender inequality and the lack of ethnic diversity in teaching. There was some support for a future-focused workforce strategy based on Te Tiriti o Waitangi. Equity of teacher employment was suggested (*“a Māori employment ratio to non-Māori 1:3 of same skills/experience”*). Some queried the evidence on whether diversity of teachers would rectify teacher quality. Others identified the persistent gap between boys’ and girls’ achievement and the lack of male teachers, commenting that this fact was absent from the Report.

### ***Recommendation 17: A Curriculum, Learning, Assessment and Pedagogy unit at the Ministry of Education***

Most submitters agreed that a Curriculum, Learning, Assessment and Pedagogy unit sitting within the Ministry had potential to improve teaching and learning (*“supporting learning and pedagogy should be the Ministry’s core function currently”*). It was noted that such a group used to exist in the Ministry. Many submitters reiterated that Hubs did not need to be involved (*“we cannot see why schools cannot have a direct relationship with this curriculum unit”*).

In relation to the recommendation that this unit would ensure teachers *“have access to proven professional learning and development (PLD) programmes linked to National Education Learning Priorities”*, many submitters noted that quality assurance of PLD programmes currently lacks consistency. Submitters questioned how the proposed unit would be coordinated with the Ministry’s Curriculum, Progress and Achievement work stream, as well as whether there was a proposed link to early childhood education.

Submitters also made the following recommendations:

- pedagogy/curriculum research should be led by the Ministry of Education and kept out of the private sector
- PLD should be centrally-funded and made more available sector-wide including early childhood education, and extended to paraprofessionals and relief teachers
- there must be a clearly articulated vision statement for curriculum leadership
- a Curriculum, Learning, Assessment and Pedagogy unit must employ trained, skilled and experienced educators

- the curriculum should first be reviewed
- iwi-led PLD on the topic of sustaining cultural identity should be embedded across the sector, at all system levels
- all PLD programmes should be linked to Te Tiriti o Waitangi.

PLD was also commented on in relation to Recommendation 20 (*“that Hubs coordinate professional learning and development”*).

### **Recommendation 18: Kāhui Ako/Communities of Learning**

Submitters had mixed views on the success of Kāhui Ako as a collaborative and developmental model across schools. At the systemic level, submitters described *“the significant restraints that have been imposed on the Kāhui Ako model... they are currently stifled by the rules and regulations imposed upon them”*. Funding inequities between Kāhui Ako and non-Kāhui Ako schools were also viewed by some as a factor in creating inequities in the broader system.

Submitters who supported the Kāhui Ako model considered it was *“beginning to show evidence of success in some places”*, *“making a difference”*, and *“in keeping with successful contemporary organisational models”*. The same submitters asked for patience and persistence to retain the model within the education system, with its collaborative design that was counteracting *“the negative impact of competition”*.

Submitters felt that Kāhui Ako were well placed to continue being developed as an existing structure (not subsumed into Hubs), or for 4 to 6 Kāhui Ako to join a Hub framework. Most submitters agreed that more flexibility was required. People described how Kāhui Ako had become *“supply-led”* by the Ministry, rather than being *“demand-led”* by the community. Submitters who represented a Māori voice were clear that *“Kāhui Ako must make a commitment to delivering quality te reo Māori education”*.

In contrast, there was a strong sentiment from submitters who felt that the implementation of Kāhui Ako had been unsuccessful, and should be abandoned:

*“Many schools complain about the ineffectiveness of the current Kāhui Ako system. Some schools who already have worked as a cohesive cluster have proactively refused to join the Kāhui Ako scheme because they see it as an inferior model. It is only Ministry of Education staff who are enthusiastic about Kāhui Ako. From my observations, a lot of time and money has been invested in this project with absolutely no visible outcomes. This is a classic example of Ministry of Education managers creating jobs for themselves.”*

Some submitters felt that it was problematic that there was no evidence to show the effects of Kāhui Ako on student and teacher outcomes.

### **Recommendation 19: Teacher appraisals**

Submitters generally accepted the Taskforce’s view that the quality of teacher appraisal is variable. Additionally submitters stated that appraisal was onerous for managers, and costly for small schools. Opinion was mixed about whether having more flexible guidelines for teacher appraisal would achieve the desired professional growth and school improvement outcomes. While some supported the recommendation for more flexibility others thought the problem was how appraisal was conceptualised (*“the issue is less to do with flexibility, and more to do with people’s conceptions of appraisal as a mechanism for proving rather than one for improving”*).

However, appraisals were described as important for early identification of underperformance and as a method for improvement. Peer-appraisal alone was not

considered sufficient, because *“at the end of the day someone has to make a call on whether any individual is competent or not and you have to have solid evidence”*.

There was a call for cultural competency to be included as part of the appraisal process within a cyclical review, where teacher re-registration *“should include an appraisal of capabilities in te reo, tikanga and local matauranga”*.

### **Recommendation 20: Centralised PLD and advisory services**

Submitters largely welcomed centralised coordination and provision of PLD, as *“the time needed to apply and manage the process of PLD is unnecessarily high”* and access *“is inequitable”*. Recent moves by the Ministry to outsource PLD provision were described as a failed project.

Through a te Ao Māori lens, it was recommended that if PLD and advisory services sat within Hubs they should work alongside mana whenua/iwi to *“grow and sustain local expertise”* for culturally responsive pedagogy.

Submitters also suggested the following:

- teacher-release resourcing so that teachers did not have to squeeze PLD into their already too-busy schedules
- improved access to high quality PLD
- streamlined models of continuing PLD from early childhood education through to tertiary-level.

While re-centralisation of PLD was mostly favoured by submitters, most did not support the proposal that Hubs administer PLD and advisory services. Existing structures of the proposed Leadership Centre could take on this role. Submitters responding to the Hub-led PLD/advisory services recommendations queried where the staff would come from and how much the process would cost. Submitters were also concerned about access to the full range of PLD required, and the loss of agency of their boards:

*“With 125 schools being managed by the hub, they would struggle to provide the range of PLD needed and the PLD provided would not be tailored for individual schools’ needs. It has the potential to become generic.”*

*“Of major concern in this recommendation is the responsibility for the Hub to control strategic planning for professional development in schools. This further indicates that the roles of boards and principals are to be diminished.”*

Perspectives about hubs *“employing curriculum advisers who may include seconded teachers/kaiako”* were divided. Some (including many from the state integrated sector) felt that secondment would be disruptive for students and teachers, and encroach on personal and employment rights (*“teaching staff need security of tenure and position”*). Others saw secondment as a positive opportunity to increase networking and knowledge-sharing, and encourage people’s understanding of inclusivity and equity.

## Key Issue 6: School Leadership

### Summary of Taskforce's view

The Report described the current oversight and strategic planning of leadership within schools as lacking. In particular, principals were identified as key leaders who were generally under supported, overworked, and missing opportunities for career development. Career pathways that developed leadership were difficult to identify. Principal appointments and performance management were identified as requiring support at the system-level and individual-level, with recruitment a particular issue in small, rural, and low-decile schools.

### Overview of what submitters said

There was general support for centralising leadership development. There were two strong themes across the scope of submissions. First, principal quality was unanimously associated with the quality of teaching and learning in schools, and therefore with student success. Second, the issue of inadequate/inappropriate pay at all levels of school leadership.

Some submitters stated that all practitioners, including middle management, needed to be considered for leadership potential and support, not just principals. Compulsory continuing education and supported leadership were regarded as pathways to improved outcomes for all students.

Meaningful bicultural leadership developed by Māori, for Māori, was called for and includes *“leadership training and mentoring, educational seminars and research, and culturally appropriate pedagogy training, particularly Māori pedagogy”*. It was expected that mana whenua principals from different rohe *“can articulate their roles and responsibilities in addressing [name of iwi] aspirations of culture, language and identity and the links to Te Tiriti o Waitangi”*.

### Submitters' views about recommendations 21, 22 & 23 of the Report

#### **Recommendation 21: Leadership Centre: site of cohesive leadership strategy**

There was strong support for the placement of a Leadership Centre within the Teaching Council, from where the Leadership Strategy & Leadership Capabilities Framework could be implemented. Some submitters had reservations largely centred on the Council's role as the professional body for teachers – as the Council was not a body generally responsible for school improvement. Submitters clearly saw funding of expanded functions as a Crown responsibility and this needed to be stated as such.

Submitters who represented a Māori voice called for *“co-design and co-construction (not consultation)”* on the Teaching Council expansion, including: iwi-endorsed Māori representation of 30% positioned within the Council; Council expansion subject to the establishment of a Māori Education Authority; and calls for expansion to include Māori immersion and Māori medium schooling expertise.

Māori submitters also called for iwi representation, diversity of leadership skills, and Māori leadership programmes or a specific leadership centre for Māori. Some submitters noted the presence of established and accepted guidance that should be built on, for example *The Leadership Strategy for the Teaching Profession of Aotearoa New Zealand (2018)* and *Master of Secondary School Leadership* programme.

Submitters requested more information about why the Leadership Centre would be placed with the Teaching Council rather than the Ministry of Education. As well as how the Leadership Centre would be funded.

**Recommendation 22: Leadership Centre roles and functions**

Submitters had differing views on appropriate leadership advisers. Some advocated for the placement of principals as leadership advisers. Another view was that leadership advisers did not need to be from the education sector. Submitters strongly advocated for leadership advisers to have both theoretical and practical knowledge. In addition, pay parity across the sector was required, noting that leadership advisers within the Ministry of Education under the current model are relatively poorly paid in comparison to principals in schools.

Access to leadership PLD was generally described as problematic, with submitters citing previously successful and now disestablished leadership training including: the Principal Development Planning Centre, *the Aspiring Principals and First Time Principals* programmes, and permanent in-school advisory services. Submitters suggested “*Growth-model*” coaching and appraisal of principals as more desirable than compliance.

There were recommendations that the Leadership Centre ensure a Māori to non-Māori ratio in schools of 1:3 for principals with similar skill sets, and that core leadership competencies in te reo Māori, tikanga and local mātauranga be mandatory and measured against student outcomes and not token ‘add-ons’.

Submitters asked many questions about how the Leadership Centre would function. Within this, submitters asked:

- How will the Leadership Centre be protected from potential power/influence networks within Hubs?
- How will competition for resources at the Hub level be managed?
- How will a cultural shift to support relationship interdependence be activated?
- How will experiential leadership (as well as book-learning) be taught?
- What will the involvement of the Leadership Centre be with the early childhood, tertiary, and rural sectors?
- How will the special character of state-integrated schools be accounted for at the leadership level?

Submitters also asked the following around leadership advisers:

- What will leadership advisers’ roles be, who will they be responsible to, and how will they be made accountable by the Hubs?
- Will Māori leadership advisers be specifically recruited?
- How will leadership advisers stay current with the needs of principals, students, whānau and the wider community?
- What will quality assurance of leadership competency look like?

**Recommendation 23: School Leadership and the role of Education Hubs**

Some submitters considered that Hubs were unnecessary for implementation of the leadership recommendations.

Submitters opposed Hubs having responsibility for principal employment. The majority of submitters objected to input from a centralised bureaucratic entity on a decision that they felt was highly contextual to individual schools (“*a Hub having responsibility for teacher and principal employment is contrary to preservation of a school’s unique qualities and development*”).

A minority saw value in Hubs employing and performance managing principals. Where there was openness to Hubs being involved with these roles, submitters generally supported boards of trustees retaining the final veto on principal appointments.

Irrespective of the structure of leadership development, submitters stated that principals should be selected by “*people with educational backgrounds*”, receive induction support that is “*customised to the community*”, and that principals be incentivised to work at the most challenging schools.

As previously noted, there was almost total submitter opposition to Hubs moving principals around Hub networks. Submitters were concerned about the disruptive effects on principals, their schools’ culture and the students. A very small minority could see the merits of sharing leadership knowledge through this mechanism, but some of these submitters questioned the practicality of this recommendation given the current challenges with practitioner and skills shortages. Other submitters cautioned that moving principals around school settings may be ineffective due to the diversity of schools across the country.

Submitters asked the following about the impact of the leadership recommendations on principals:

- Will the Teaching Councils’ conditions for principal applications hold for schools that are hard to staff?
- How will proven leaders be attracted to schools in challenging circumstances?
- What will happen if principals are unwilling to undergo secondment?
- What will the principal ‘national guidelines for eligibility’ look like?
- What does best practice for sharing common problems and solutions amongst principals look like?
- How will inclusive education be promoted and taught to principals who currently lack this knowledge?
- Will principals’ contributions to the proposed Hubs have a negative impact on their own school?

## **KEY ISSUE 7: RESOURCING**

### **Summary of Taskforce’s view**

The resourcing of schools was not specified in the Taskforce’s terms of reference and they did not undertake a full review, but did identify key resourcing issues where they impacted on their terms of reference.

### **Overview of what submitters said**

Most of the recommendations under Resourcing had the support of the majority of submitters (with the exception of school network reviews), but there were many questions and concerns. Submitters largely supported implementing the proposed equity index as soon as possible, in principle, and prioritising increased equity resourcing to schools. However submitters’ responses suggested a need for greater clarity of these recommendations. There was broad support for the sharing of best practice about use of equity funding, although some questioned who would define best practice, and it was noted that this sharing occurs now. The majority of submitters were in favour of reviewing the allocation of staffing entitlements and management resources to ensure coherence across primary and

secondary schools. Submitters had mixed views on Hubs carrying out school network reviews with some objection to small schools being “*singled out with the implication that they are not providing a quality education*”.

### **Submitters’ views about recommendations 24 to 27 of the Report**

*“Regardless of the quality of schooling offered in low decile schools or in schools with a ‘high inequality index’ score, parents will continue to take their children elsewhere because disassociation with the poor is the motivating factor. This means that under funding models based on student numbers, schools with the least desirable equity funding measure (be this decile or inequality index) will also be smaller than average and so more vulnerable financially and operationally.”*

### **Recommendation 24: Implementing the equity index**

Submitters mostly supported the recommendation to implement the proposed equity index as soon as possible. They agreed that decile funding was a blunt instrument and that additional resourcing was needed particularly for schools in the most disadvantaged communities. There was an expectation amongst submitters supporting this recommendation that the equity index would provide a more fine-grained method of differentially funding schools through “*better identifying those schools with the highest proportions of disadvantaged students*”.

Some submitters raised concern that equity funding may have the same unintended consequences as the decile funding system. One submitter asked, “*How long will it take people to talk of a school’s equity index as a proxy for school quality in the same way the decile rating was commonly used?*” It was recommended by several submitters that funding formulas and amounts not be published. Many noted that this funding model did not require Hubs to be established, with some noting that the further away the resourcing system/decision making was from schools then the less effective it would be.

Although most submitters agreed in principle with this recommendation, they had many questions and concerns, including:

- How transparent, robust, valid, clear and equitable was the equity index as a funding model?
- How will the shift from decile funding affect schools?
- Will it mean taking funding from ‘successful’ schools to improve ‘underperforming’ schools?
- Does this assume that parents who are better off can support their schools by paying donations (which would contradict the proposed restrictions on donations)?
- Will the administration of the equity index be efficient for schools?
- Will the equity index create a ‘coupon system’ where students who attract higher funding take that funding with them whenever they move schools?
- How will the equity index meet the Taskforce’s broader aims (of reducing the inequality between schools and having children attend their local school)?
- Are all students’ needs considered, for example would the equity index take into account children who need support with their behaviour and learning?

Submitters suggested that:

- many of the issues arising under the current model could be alleviated through a more sensitively tuned funding model, regularly reviewed to ensure that is based on both 'need' and experience
- the equity index needs to be updated often to reflect rapidly changing communities
- iwi need to be involved in the development and co-construction of the equity index
- there should be firmer processes and data collection in place for how money is used to address disadvantage
- the priority in terms of this index needs to be breaking the cycle of lower end education results/achievements.

Other points submitters raised included:

- reducing the work of the (largely) voluntary and often skilled boards of trustees at the expense of employing many specialists and administrators across the country to run the proposed Hubs would redirect limited resources from teaching and learning
- inequity will remain while some schools can raise money from their local communities
- confusion about whether the Taskforce was proposing use of the same equity index funding formula used in early childhood education or a different one, in which case the two models should be aligned
- the following statement from page 111 of the Taskforce Report is false, *“there are no mechanisms to ensure principals make good use of resourcing”*
- requests for evidence supporting the Taskforce’s statement that a principal’s salary incentivises principals to grow their school rolls.

### *Equity resourcing*

Submitters were largely in favour of the recommendation to increase equity resourcing to a minimum of 6% of total resourcing and prioritised for the schools with the most disadvantaged students. They considered it would help to ‘produce a more level playing field’. However, there was a significant amount of confusion evident in responses (in particular, conflating the equity index as a funding formula with the recommendation to increase equity resourcing to the most disadvantaged school to a minimum of 6% of total resourcing).

Most submitters accepted the comparison with other OECD countries stated in the Report (page 19), however several submitters took issue with it. (*“Actual equity funding is very difficult to compare between nations, which is why the OECD does not do it... The basis for the comparison drawn on by the Taskforce is unknown.”*).

Some submitters also recommended that equity resourcing not be based on a percentage basis but on the actual needs of each school and appropriately funded. (*“Education Hubs in collaboration with mana whenua identify the needs of the schools and resourcing is provided to reduce the inequity currently in place across the rohe.”*) There was some advocacy for property to be removed from the equation. (*“Prioritising these issues should be on a ‘needs’ basis not a ‘prioritisation for disadvantaged’ basis. To say to a student that ‘because you live in a warm house you have to put up with a cold leaky classroom for the next year or so’ is simply wrong and the notion of prioritising property for disadvantage should be abandoned immediately.”*).



Considering equity more widely than relative amounts of funding, one submitter noted that *“inequality is endemic in the whole culture of our education system including parts of teacher practice, the framing of curriculum and the dominant pedagogy. These biases result in such things as deficit thinking, unconscious bias and racism”*.

### **Recommendation 25: Staffing entitlements and management resources**

There was majority support for the recommendation to review and align staffing entitlements and management resources across primary and secondary schools. However, this support was frequently based on the view that primary schools' entitlements would be increased through such a review.

A small minority of submitters disagreed with the recommendation on the basis that a review would lead to parity between primary and secondary schools. These submitters questioned whether the Taskforce *“assumed that secondary staffing is already sufficient and has failed to grasp that secondary and primary staffing formulae are different because specialist delivery requires more staff.”*

Other submitters detailed the demands made on secondary principals, for example:

*“... not only school size (the number of teachers, students and parents ...) but also the demands of implementing the national qualifications system across three levels of students, the transition of students into tertiary, work etc, the demands of organised co-curricular activities and the nature of adolescents, in particular the increasing mental health needs that we are seeing – which peak during secondary school. Secondary school staffing entitlements and Principal's salary should be significantly more than primary and intermediate.”*

It was suggested that this issue be looked at as part of the development of a coherent workforce plan.

Submitters asked several questions about this recommendation, including:

- Who would be reviewing allocations and making the final decision?
- What does 'fit for purpose' mean (in the context of management and staffing entitlements)?
- What would the impact be on special schools?

Submitters supported primary schools being allocated resources to employ guidance counsellors, and the addition of funding for school guidance counsellors taking account of the size of secondary schools.

Submitters commonly supported the Taskforce's recommendation that school property funding be allocated on a more equitable basis than the current calculation model, acknowledging the work underway in this area.

### **Recommendation 26: Sharing best practice around the use of equity funding**

Submitters generally supported the sharing of practice about use of equity funding. However, some questioned who would define best practice. It was suggested that best practice be identified and validated by mana whenua, or similarly that any practices determined to be 'best practice' and shared with other schools must be endorsed by iwi (*“to provide accountability to mana whenua that 'best practices' are addressing inequity for our children and whānau”*). Others agreed that best practice must have a focus on the needs of learners.

Several submitters noted that sharing of best practice already occurs within current structures (including Kāhui Ako), and questioned the assumption that the Hub structure

would provide greater expertise and more timely contact than the current system. Others thought it did not occur enough, and that *“facilitated collaboration is a positive approach”*. There was also some scepticism about whether sharing best practice would contribute much to systemic change. There was concern about *“forced or imposed collaboration”*, and the unintended negative consequences such actions might have. It was further pointed out that having to share best practice within a Hub structure was another example of a new task being proposed *“that involves a principal or teacher doing something that, up till now, they have not had to do”*.

### **Recommendation 27: School network reviews**

*“Small schools can face extreme challenges that do need addressing.”*

Submitters had mixed views on the recommendation that Hubs carry out school network reviews to ensure smaller schools that are unable to deliver quality education services are merged with others, or closed. Some agreed it made sense, but there was also objection to small schools being *“singled out with the implication that they are not providing a quality education – should we not be looking at the quality of education provided by all schools?”* If a small school was not functioning well, it should be supported *“as with any poorly functioning school”*.

Submitters were largely focused on rural schools in relation to this recommendation, and there was significant comment on the school as a focal point within small communities. Submitters also noted equity issues to do with access (*“any review must consider the effect of requiring a child to travel significant distances to attend school.”*). Submitters also raised that there should also be opportunities for Te Kura and other providers to assist with curriculum delivery and student extension for remote schools.

Some submitters focused on the process of review, stating that transparent criteria were needed for funding and school closure considerations. Iwi groups expected genuine power sharing relating to any review (*“from conception to final decision making”*). Integrated schools that were part of a national network wanted decisions to be at the national level, sitting with the Ministry of Education Office in Wellington (as they currently are). It was also noted that network reviews require expertise, *“and there are unlikely to be staff for 20 Hubs with the level of ability to handle legal intricacies of preparing advice for the Minister on a range of school network changes”*.

## Key Issue 8: Central Education Agencies

### Summary of Taskforce's view

The Tomorrow's Schools Review Report described the roles and functions of central education agencies as they currently stand. This discussion covered: political prioritisation and the need for cohesive long-term strategy; insufficient orientation toward teaching and resourcing; Ministry of Education and Education Review Office (ERO) functioning; the quality assurance functions of ERO, New Zealand Qualifications Authority (NZQA) and the Ministry; and responsibility for leadership development. The Taskforce recommendations proposed five structural changes for the improvement of the education system.

### Overview of what submitters said

Most submitters agreed that increased cohesion across all central education agencies was an important part of improving outcomes. However, submitters had several overarching concerns about the recommendations made under this key issue. Most commonly, submitters found it unclear how the proposed changes would refocus central education agencies onto student-centred outcomes. Submitters stated that any change should be founded on solid evidence supporting high quality public education, and should only happen if it could be shown to improve outcomes for students. Further, the success of any changes rested on security from the *"political battleground"*. Many submitters questioned the cost of change and asked where this money would come from. Additionally, the lack of explicit reference to Te Ao Māori was noted (*"unless there is dedication to a Māori worldview at the system level, we question how the suggested changes, while promising, will achieve change for Māori learners and whānau"*).

Submitters supported the call for increased effectiveness and monitoring of central agencies, particularly relating to accountability for student learning and wellbeing. While there was support for reconfiguring the Ministry of Education and for the proposed Education Evaluation Office, there was also support for the improvement of existing structures, including increased resourcing of existing Ministry regional offices. There were mixed views on the proposed disestablishment of ERO. There were also mixed views on the disestablishment of NZQA, including the view that the Report contained no argument for the recommendation.

The majority view was that any reconfiguration should only happen if it could be shown to improve outcomes for students. There was concern about the costs of restructuring and the potential for increased bureaucracy. Submissions from whānau Māori described a lack of explicit reference to te Ao Māori and indigenous governance. Many submitters wanted more detail around to the reconfiguration of central education agencies.

Recommendation 29 (the establishment of Hubs) and Recommendation 31 (the expansion of the Teaching Council) were also made under other key issues, therefore submitters' views on these recommendations have been summarised earlier in this report (see page 10 and page 29 respectively).

### Submitters' views about recommendations 28, 30 & 32 of the Report

#### **Recommendation 28: Reconfiguring the Ministry of Education**

Submitters had a mostly critical view of the Ministry of Education. This view was based on bureaucratic constraints that submitters had experienced with the Ministry, exacerbated by the lack of staff with deep educational knowledge and high staff turnover in the Ministry. Some submitters also considered that the Ministry had a low trust relationship with boards of trustees.

Submitters advocated for a change of Ministry culture and mind-set towards advocacy and *“the Ministry as ‘stewards’ rather than leaders of the system”*. Moving toward a high trust approach was also viewed as necessary. Submitters wanted the Ministry to be an *“effective facilitator”* that was *“service-orientated”* and *“solution focused”*. Submitters rejected the idea of managerialism. Submitters who represented a Māori voice called for a reflection of the principles of Te Tiriti o Waitangi and iwi tino rangatiratanga, requiring that *“the newly configured Ministry of Education will clearly and visibly align with the aspirations and goals of iwi”*.

Submitters who were in support of Ministry reconfiguration suggested that this change was necessary irrespective of whether Hubs were established. Several functions in particular were widely supported by submitters, including:

- a research, evaluation and reporting function was considered important (*“if we can’t measure then we can’t manage”*)
- collection of system-wide performance data was considered long overdue. Some submitters suggested this must include data on student, staff and parent complaints
- there was strong support for the establishment of the Curriculum, Learning, Assessment and Pedagogy Unit, and for advisory services within the Ministry.

#### *Improvement of the central education agencies without major reconfiguration*

There was significant submitter support for the improvement of the existing central education agencies without major reconfiguration. This included moderate support for increased resourcing of existing Ministry regional offices. This position was sometimes prompted by doubt that reconfiguration of the Ministry would be effective, and objection to the cost of change. Other submitters considered that adjusting policy at the government level would rectify the coherence issues of the central education agency functions, eliminating the need for *“radical changes at the level of the school”*.

#### *More detail on reconfiguration*

Many submitters asked for more consultation and more implementation detail relating to the reconfiguration of the Ministry, with an emphasis on having sufficient evidence to support this recommendation. Some submitters considered that a *“Review of the Ministry itself should have come before this wide ranging Tomorrow’s School Review that has made many suggestions that are not adequately supported by presented evidence”*.

There was some submitter concern about a politicised relationship between the Ministry and the proposed Hubs (*“it continues a divide between those who determine policy... and those expected to carry it out”*). Concerned submitters hoped that embedded *“negative culture”* and *“risk-averse behaviours”* would not be transferred from the Ministry to Hubs. And while some people described bureaucratic incompetence and poor accountability, others were aware that *“often the ‘errors’ are linked to insufficient funding”* at both national and regional levels. Based on current experience with unresponsive regional offices, there was scepticism that Hubs would be capable of providing more responsive communication.

#### **Recommendation 30: Education Evaluation Office (EEO)**

There was broad support for EEO oversight of Hubs and/or the Ministry – if the proposed EEO was an independent watch dog, operating from a high-trust framework. Most who commented agreed that the EEO should be independent of the Minister. Submitters

described their desire for the EEO to operate *“with a genuine focus on assisting school improvement rather than measurement”*.

Some suggested that the Education Evaluation Office could be created through repurposing the Education Review Office. This could not be a mere name-change, however, and the agency would need to be protected from political whim.

Submitters made the following recommendations about the proposed EEO:

- there must be iwi-endorsed representation within the EEO
- the new EEO should have the school advisory function restored and be overseen by a separate ERO authority that reports directly to Parliament on performance of EEO, Hubs and Schools
- evaluation should be a *“360 degree process”*, where schools, students and the public feedback on the schooling system, Hub performance and effective partnerships
- evaluation *“should actively seek parental input at all levels”* and *“evaluation reports should include a strong whānau voice and iwi perspectives”*.

Submitters also asked the following questions:

- What is the vision of the EEO for a more inclusive education?
- Will the EEO have the authority to recommend improvements with the interactions of outside agencies with schools?
- How will Hubs be prevented from becoming a quality control authority if they are required by the EEO to review their own schools?
- What would the relationship between the EEO and Teachers' Council be?
- How would early childhood education services be evaluated if they are not within Hubs?

Some submitters wanted more evidence before the case for EEO establishment could be decided.

Opposition to EEO establishment, beyond questions about efficacy and cost, was largely based on the concern that a more centralised system risked a more adversarial approach. (*“The shifting from ERO/School to EEO/Hub will mean the culture of relationship... will risk shifting from one of partnership to one of imposition.”*).

### **Recommendation 32: The disestablishment of ERO and NZQA**

Submitters were clear that tertiary institutes, schools and early education centres needed to be externally reviewed by *“independent entities”*. There were, though, mixed views on the proposed disestablishment of ERO. Support for disestablishment was largely due to submitters considering that ERO focused on performance review rather than school development. There was also criticism of the inconsistent quality of reviewers. However, some submitters considered that ERO capability could be strengthened by *“a focused re-purposing”* without structural change (*“ERO is valued by most schools... Small changes in ERO processes and accountability can easily overcome some of the existing problems, wholesale change is not needed”*).

Other submitters were unsure about the proposed disestablishment of ERO because the Report lacked detail on how the functions of ERO would be operationalised elsewhere.

Submitters asked how parents would be informed about the performance of schools, and how the new configurations would be staffed.

### *The disestablishment of NZQA*

*“Before NZQA was set up as a separate Crown entity nearly 30 years ago, qualifications and assessment, and curriculum were both the responsibility of the Department of Education. One of the concerns that educators expressed at that time was that national assessment in the senior secondary school was, in some instances, driving the curriculum rather than responding to it. We do not support a return to a single structure that we believe would increase that risk.”*

Fewer submitters commented on the disestablishment of NZQA. Some were concerned about the possibility of *“further erosion in academic rigor”*, with the Taskforce proposals *“silent on how NZQA will effectively be replaced”*. Some suggested that a review of NZQA should be undertaken and considered in light of both the Tomorrow’s Schools Review and NCEA reviews. Submitters raised the following questions:

- Who would monitor tertiary institutions, if not NZQA?
- How would standardisation of the assessment system be assured?
- Where would the NZQA qualifications role sit?

Submitters who opposed structural changes to NZQA felt there was little evidence that this action would *“make a positive difference for all learners and especially those who are not well served by the system”*. Submitters were clear that *“a stand-alone entity is pivotal”* and there was *“risk of losing a national perspective”*. Importantly, *“the exemplary work NZQA has done in the equity self-review needs to be reflected in the practices of the new organisation”*.

There was a perspective within submissions that the recommendation for disestablishing NZQA was *“casually made”*, with very little evidence in the Report to justify it. The Taskforce’s view that the issue of ‘assessment driving the curriculum’ would be solved by dismantling NZQA was considered erroneous. (*“There will always be a tension between curriculum ambitions and the needs of a national qualification system.”*).