

TE HONONGA AKORANGA

COMET



Submission on the Report by the Tomorrow's Schools Independent Taskforce 2019

Submission 099/19
Prepared on behalf of COMET Auckland, April 2019

Whakatauāki

E kore e taea e te whenu kotahi ki te raranga i te whāriki kia mōhio tātou ki ā tātou.

Mā te mahi tahi o ngā whenu, mā te mahi tahi o ngā kairaranga, ka oti tēnei whāriki.

I te otinga me titiro tātou ki ngā mea pai ka puta mai.

Ā tana wā, me titiro hoki ki ngā raranga i makere nā te mea, he kōrero ano kei reira.

- nā Kūkupa Tirikatene

The tapestry of understanding cannot be woven by one strand alone.

Only by the working together of strands and the working together of weavers will such a tapestry be completed.

With its completion let us look at the good that comes from it.

And, in time we should also look at those stitches which have been dropped, because they also have a message.

About COMET Auckland

[COMET Auckland - Te Hononga Akoranga](#) is an independent charitable trust and Auckland Council's CCO focused on education, skills and lifelong learning across Auckland and, increasingly, other parts of the country. Our latest Statement of Intent is [here](#).

Briefly, our work involves:

Sector leadership – mapping data and evidence, working with sector leaders to identify and prioritise the most pressing areas of focus, and connecting people around that common agenda, to plan collaborative action.

That can then lead to advocacy or changes to partners' business as usual, or sometimes to planning and trialling new ways of working (incubation projects).

These incubation projects generally develop through scoping and planning to trialling, and then implementation and evaluation, with the goal of handing them on once they are fully developed so we can move on to focus on another part of the system.

Contact for communications:

Susan Warren, Chief Executive, COMET Auckland

Email: susan.warren@cometauckland.org.nz

Ph 09 307 2101, Mobile 021 757 048, Fax 09 379 5053

PO Box 3430, Shortland Street, Auckland 1140

www.cometauckland.org.nz

Introduction

Thank you for the opportunity to comment on Our Schooling Futures: Stronger Together: Whiria Ngā Kura Tūātitini.

This submission has been assembled based on our own collective knowledge and experience, and our ongoing engagement with our stakeholders, including educators, community leaders, employers, parents and students.

We are interested in presenting an oral submission, if this can be done in Auckland.

Overview

The report's summary of the current state of the education system is well observed and clearly evidenced. There is good analysis of data and feedback on the schooling system, though the report could have been strengthened by including more analysis on the connections (or lack thereof) between schooling and other parts of the system – especially families, ECE, tertiary organisations of all types, employers and community. The absence of such an ecosystem view shows in the recommendations, which do not touch on the potential value of strengthening connections among education sectors.

We agree with the conclusion that more needs to be done to achieve equity of opportunity and outcomes for our nation's increasingly diverse learners. What is not so clear is the link between that goal and the specific actions recommended.

As the report recognises, a key priority for change is equity and excellence for Māori learners. We would like to see a firmer requirement for iwi representation on hub boards, and for specific roles for Māori and Pasifika experts on hub staff. We welcome the intent to increase support for kaupapa Māori education, and to enable Māori to lead the directions for their schooling. We think this needs to go beyond a single hub for kura kaupapa (which is itself problematic because it does not enable iwi control of education in their rohe). The structure of governance for kura needs to be decided by Māori and we would hope to see a process for this before any decisions on what follows Tomorrow's Schools are finalised.

The vast majority of Māori students are in mainstream schools, and data shows that these students are not well served by the current system. More effort therefore needs to be made to ensure the mainstream system is better able to support Māori students, starting in the classroom with better professional development for teachers, curriculum that respects and builds on the cultural strengths Māori students and their whānau bring. Providing all students with the opportunity to learn and strengthen te reo Māori would be a powerful and achievable¹ lever to raise Māori achievement and contribute to greater intercultural understanding.

We welcome the recommendation to increase equity funding. This has potential to make a real difference, and to have an almost immediate effect.

¹ A strategy (including a teacher workforce plan) for working towards Te Reo Maori for all students has been proposed by the Auckland Languages Strategy Working Group in their *Strategy for Language in Education in Aotearoa New Zealand 2019 – 2033*. <https://indd.adobe.com/view/803a8a0b-a706-4e4e-a108-2dc73eebe71b>

We see the potential for the proposed hubs to enable school boards to focus on their core business and to provide support, coordination and community voice so that schools can share effective practice, access advice and support and connect better with their wider communities. However, there is significant risk that the hubs could become bureaucratic, limiting rather than enabling innovation and adding rather than reducing schools' reporting burden.

Everything hinges on the detail of the hubs' roles and powers, how they are governed and lead, and how the people who work in them are selected and managed. A number of the proposed roles of hubs are already part of the local MOE offices' roles, but the long-established "hands-off" culture of the MOE means that any form of intervention is rare and likely to be just a little less than is needed to make real change. The hubs will need to establish a very different relationship with the schools, as close partners and critical friends rather than occasional critics. That means more people in total, and it also means people with very specific skills.

Given the risks involved in implementing the hub idea, and the extent of the other changes recommended in the report, we are concerned at the implied intention to make the change quickly and in one sweeping transition. Changing a 30-year-old system needs time. There will be unintended consequences of particular changes that cannot be easily anticipated and that could mean the change causes more harm than good. We would therefore like to see a staged transition, with central agency changes deferred and with a trial of the hub proposal in one or two small areas first, to identify what works and how to mitigate the risks.

1. Governance

Recommendations from the report	Do we agree?	Comments
The role of boards should be re-oriented so that their core responsibilities are the School Strategic and Annual Plan, student success and wellbeing, localised curriculum and assessment.	Yes	This will enable school boards to focus on the core role of schooling.
Education Hubs would assume all the legal responsibilities and liabilities currently held by school boards with automatic 'delegation back' to principals/tumuaki regarding control of operational grants and staffing entitlements and recruitment.	Yes	This takes some legal pressure off school boards which can be a barrier for people considering joining a board; while ensuring the principal has delegation to appoint staff and manage their budget.
Further 'delegation back' opportunities would be provided regarding property development through 5YA (five yearly agreements).	Yes	This should be a choice for schools – some may prefer the hub to manage property, others may wish to have control.
Boards should be involved in principals/tumuaki' appointments and retain final right of veto on their appointment, but will not be the employer of the principal or teachers.	Yes	Most boards struggle with principal appointments and too many less-than-ideal appointments are made because boards do not have the skills to do this well. Guidance from the hubs will help address this problem, while still ensuring boards have the

		final say on who will best fit their school and community.
Boards will not be responsible for decisions on student suspensions, exclusions, and expulsions.	Yes, on balance	Moving these decisions to hub level could provide more objectivity and consistency, but will also mean the decision-makers are more removed from the student, family and school situation.
Mana whenua representation on boards will ensure strategic knowledge for schooling and localised curricula.	Yes – for hubs, not individual school boards	Mana whenua voice is especially crucial at the hub level. We suggest two mana whenua representatives on each hub board, appointed by the local iwi. For individual school boards, it is more problematic to require mana whenua representation. Iwi do not have capacity to provide members for all 2500 schools in Aotearoa and may not want to do so once they can have influence at the higher and more strategic level of the hub.
Education Hubs should be Crown entities. Education Hubs would replace current Ministry of Education regional offices. They would assume many of the ‘business’ governance responsibilities currently held by school boards, while also providing specialist educational support to build good teaching and learning for all their students.	Yes	We see significant potential in the hub model, but also risks, as explained above in “overview”. On balance we think the hubs are positive, if implemented well, and if trialled first to ensure potential issues are identified and addressed before they are fully rolled out.
Education Hubs should have a Ministerial appointed governance board with at least half of the positions filled by practising educators, and other positions from local iwi and community stakeholders.	No	We would like to see local communities having a significant say in the selection of hub boards. Ideally iwi should appoint two members (with no right of veto from the minister), and other members would be elected locally (with potential approval by the Minister). It is hard to see why there needs to be a specific requirement for educators at the board level of hubs, given that the hubs will have a team of education experts as staff and leaders.
Education Hubs will support schools individually, as well as collectively.	Yes	This is the part of the hub’s role that has potential to make the biggest difference, if it is done well. It will require clarity of role, effective leadership and skilled staff who build strong working relationships with all the schools in their area.

As part of the Crown's obligations to Te Tiriti o Waitangi, active consideration should be given to the establishment of a national Education Hub for Kaupapa Māori settings.	Maybe	We are hearing concern from iwi that a national hub would limit the ability of mana whenua to shape education in their area around their own aspirations, reo a iwi, tikanga and local history. Any decision will need to be made by Māori, before the hub plan is finalised.
Education Hubs should: Partner with and monitor schools on a regular and collaborative basis to ensure they are supported, and any problems are identified and responded to early.	Yes	See above comments re role and skills required for this.
Education Hubs should: Provide and/or broker local curriculum, learning, assessment and pedagogy advisory and development services to teachers; and provide leadership advisers to support principals/ tumuaki.	Yes	
Education Hubs should: Support teachers/kaiako and principals/tumuaki to share their effective practices for the benefit of all the schools in the network.	Yes	The connection between hubs and kahui ako needs to be considered. One possibility is to transition the kahui ako into hubs. At present it seems that the hubs will be larger than the kahui ako. This may make alignment difficult and it also may make true collaboration and sharing among schools less likely as it is harder to build trust among such a large group.
Education Hubs should: Assume all the legal responsibilities and liabilities currently held by school boards with automatic 'delegation back' to principals/tumuaki regarding control of operational grants and staffing entitlements/recruitment.	Yes	See above
Education Hubs should: Provide further 'delegation back' opportunities regarding property development through 5YA.	Yes	See above
Education Hubs should: Support Boards of Trustees.	Yes	
Education Hubs should: Provide principals/tumuaki with ongoing employment, appoint them to schools on five year contracts, and ensure their performance management.	Partially agree	There is potential value in principals' performance being managed by the hubs, as boards currently find this difficult. However fully handing this over greatly weakens school boards. We suggest a middle ground where hubs work with boards on principals' performance management. We disagree with the proposal for five-year contracts for principals. To function well, principals need to feel

		ownership of their role, and communities need to feel that the principal is committed to them. A fixed-term contract, regardless of length, would significantly weaken the commitment on both sides.
Education Hubs should: Take responsibility for learner support provision.	Yes	This has potential to streamline the process for schools and families, and to ensure greater equity across the system.
Education Hubs should: Ensure the network of schools in the area is properly managed and utilised, that enrolment schemes are fair, and that unhealthy school competition is mediated and reduced.	Yes	This is an example of a role the local MOE offices currently have but do not always exercise to the extent needed. Hubs will need to be prepared to challenge schools on these areas – difficult when they also need to build trusting relationships. It will be important to hubs' roles and powers to be very clear, and for the hub staff to be backed by their board and leaders to focus on what is best for the students across the whole area, rather than for individual schools.
Education Hubs should: Provide parent and student advocacy and complaints services, and take responsibility for processes when students are suspended.	Yes	See above
Education Hubs should: Systematically review progress and decide goals for the Education Hub network in ways that involve school leaders, teachers, Boards of Trustees, and community stakeholders.	Yes	This is an important role of the hubs.

2. Schooling Provision

Recommendations from the report	Do we agree?	Comments
The investigation of a dedicated pathway for Kaupapa Māori settings that would include planned capacity building to support the most proficient Māori language provision for teaching and learning.	Maybe	As discussed earlier, mana whenua need to have rangatiratanga for the kura in their area. Māori will need to decide how to enable this, and what structures are best to support kura.
Seamless student transitions between schools as they progress through the education system.	Yes	This needs to also apply to transitions from home/ECE to school and from school to tertiary/work. We would like to see much more work done in this area.
The phasing in of schooling provision that provides more stability and better transitions	Yes	Again this is an area that needs more work. We would like to see fewer

for students - for example, primary, middle school, senior college, or full primary, secondary school, or composite school.		transitions and more connections between the learning and ways of doing things that students experience at different levels of the system.
The further development of full service schools and the more intensive use of school buildings and facilities both during and out of school hours.	Yes	School-based ACE provision has been largely lost but could be reinstated. This would make good use of schools' buildings, create better connections between schools and communities, and provide a valuable service to the community.
Community-wide flexible curriculum assessment and timetabling offerings in schools, including enhanced digital infrastructure and provision.	Yes	More flexibility would make better use of resources and could also provide more flexibility for students to combine school learning with tertiary study or work.
An investigation and possible change in the role of Te Kura to more closely incorporate its learning expertise across the education system as a whole.	Yes	

3. Competition and Choice

Recommendations from the report	Do we agree?	Comments
All enrolment schemes are fair and equitable with the Education Hub having final decision making rights.	Yes	See comments above re need to clarity of hub role to enable this
Limits are placed on schools recruiting out of zone students.	Yes	
Limits are placed on the donations schools may request.	No	If some communities are able to support their school then this is not a negative, provided that these donations are truly voluntary and that other schools get a fair level of equity funding so they can also provide quality education for their students.
Schools which enrol international fee-paying students provide for them independently of government funding.	Yes	
Students with learning support needs have the same access to schools as other students.	Yes	
School provision, including opening and closure decisions are made based on community needs and equity considerations.	Yes	
State-integrated schools are treated in the same way as state schools with regard to the operation of transport subsidies and enrolment schemes.	Maybe	State-integrated schools are often magnet schools, drawing students who identify with their special character from a wide area. This would need to be taken account in

		zones and transport arrangements, and may mean that it is not fair for the state to pay the entire cost of transport for these students.
--	--	--

4. Disability and Learning Support

Recommendations from the report	Do we agree?	Comments
The Ministry of Education continues to lead national strategy and policy work as well as ensuring that national priorities are regularly reviewed.	Yes	The core role of the MOE is its responsibility to the Minister – to keep the Minister informed of the state of the education system and to implement government policy.
The Teaching Council works with Initial Teacher Education (ITE) providers to ensure better preparation of teachers/kaiako regarding learning needs and inclusion.	Yes	This is a task that is greatly needed and the Teaching Council is the logical body to undertake it.
Every school has a learning support coordinator.	Provisional yes	This would be very valuable but may not be possible for very small schools, which may need to share this role.
The Education Hubs employ specialist staff, Resource Teachers of Learning and Behaviour (RTLBs) and some teacher aides and coordinate work with local health and other agencies.	Yes	This could be a very valuable part of the hub role.
The Education Hubs would apply to national funding pools to reduce the burden on parents and schools.	Yes	These applications are a huge burden on schools and families, and act as a barrier to equity. Shifting this burden to the hubs will help schools, though an even better solution would be to reduce the paperwork required in the first place.
Effective practices, innovations and localised responses are shared across Education Hubs and the Ministry of Education.	Yes	There is potential for hubs to become an engine for system learning, but to achieve this there will need to be mechanisms for the hubs to come together to learn from one another.

5. Teaching

Recommendations from the report	Do we agree?	Comments
We recruit a diversity of teachers/kaiako which matches the diversity of students as closely as possible.	Yes	There is an urgent need to address the teacher crisis. In addition, there needs to be a long-term, consistent strategy to increase the diversity of

		the teacher workforce so it better represents the population as a whole. In particular, the system needs more Māori, Pasifika and Asian teachers and more men, so students can see themselves reflected in the teaching staff and so teachers can better engage with the cultures and languages of their students.
Development of more flexible initial teacher education pathways to registered teacher status.	Yes	The Teach First NZ programme has shown that alternative pathways can be very effective in bringing a different group of people into teaching and in very effectively preparing them for the profession. This should be gradually expanded as capacity allows. There is also potential to encourage other innovations, particularly kaupapa Māori and Pasifika teacher training pathways.
Guaranteed employment for newly trained teachers.	Maybe	This would provide an incentive to train but it is hard to see how it could be done without forcing schools to take people they do not think are suitable. It would certainly require more stringent quality standards for teaching graduates.
Viable pathways for the development and enhanced status of paraprofessionals.	Yes	This could include a stepped pathway of qualifications for paraprofessionals to build and recognise their skills, with pay scales adjusted accordingly.
Provision of proven national professional learning and development (PLD) programmes and local advisory services working with the Ministry of Education Curriculum, Learning, Assessment and Pedagogy Unit to support the work of teachers/kaiako.	Yes	PD should be available on all curriculum areas, not just literacy and numeracy; it should include how to build the competencies, and linking that to employability skills; and it should include a range of support on connecting with families and communities, using data and evidence to inform practice, building on students' culture and language; and specific learning around Te Tiiriti o Waitangi and te reo me ona tikanga Māori.
Options for secondment between schools and Education Hubs and the Ministry of Education and Teaching Council.	Yes	This is an excellent way to ensure up-to-date knowledge of schools in the hubs and MOE; and for career development for teachers.

More flexible guidelines for the Kāhui Ako approach.	Yes	In addition, as mentioned above, there needs to be more work on the link between kahui ako and the hubs.
More flexible guidelines for teacher appraisal.	Yes	

6. School Leadership

Recommendations from the report	Do we agree?	Comments
Establishment of a dedicated Leadership Centre within the Teaching Council that will champion a coherent, research based approach to developing leadership capabilities at all levels of the system and establish guidelines for eligibility to apply for principal/tumuaki positions	Yes	This would be a valuable role, and placing it in the Teaching Council makes sense because it aligns with their role in guidelines for the profession generally.
Appointment of leadership advisers in Education Hubs to work closely with principals/ tumuaki. They will also: › Identify leadership potential and create diverse talent pools. › Work with Boards to appoint principals/tumuaki. › Ensure that schools in challenging circumstances get leaders with recent proven leadership experience. › Provide connected processes for the induction and ongoing mentoring of newly appointed principals/tumuaki. › Provide ongoing regular support and professional learning and development for all principals/tumuaki. › Ensure that effective principals/tumuaki contribute to leadership support and growth across the Education Hub.	Yes	This would be a valuable role of the hubs. A principal's role is lonely and having someone who is experienced in leadership and who can bring a semi-external view would be very helpful.

7. Resourcing

Recommendations from the report	Do we agree?	Comments
The proposed equity index is implemented as soon as possible and prioritised for the most disadvantaged schools.	Maybe	We agree that the decile system is imperfect and needs to be reviewed or replaced. However it is difficult to assess the proposed equity index on the information supplied. We would like to see a broad range of measures taken into account, and we are concerned that the proposed index may be too narrow, meaning that many students who need additional

		support will not be picked up in the index.
Equity resourcing is increased to a minimum of 6% of total resourcing and applied across operational, staffing and property formulas.	Yes	From the data supplied to us from the MOE, it looks as if many other countries' equity funding is significantly higher than 6%, so we would see 6% as an absolute minimum. There may be value in weighting more equity funding to the early years (ECE and primary school), as this is likely to make more difference to students' long-term outcomes.
Management and staffing entitlements are reviewed to ensure they are fit for purpose.	Yes	
Best practice in the use of equity funding by schools is shared across Education Hubs.	Yes	

8. Central Education Agencies

Recommendations from the report	Do we agree?	Comments
Significant reconceptualisation and reconfiguration of the system stewardship function of the Ministry of Education. The reconfigured Ministry would monitor and work closely with Education Hubs and have a strong national leadership role in curriculum, learning, assessment (including NCEA assessment) and pedagogy, as well as advisory services for teachers, educational research, policy development, and data analysis for system improvement.	Yes	The relationship between the MOE and the hubs will be important to ensure policy and implementation and strongly connected, in both directions.
The creation of a new independent Education Evaluation Office reporting directly to Parliament which: <ul style="list-style-type: none"> › Reports regularly on the performance of the education system. › Evaluates the performance of the Ministry of Education and Education Hubs. › Is responsible for all quality assurance functions currently carried out by NZQA. 	Yes, provisional	On balance there seems to be logic in combining the monitoring role of ERO with the quality assurance role of NZQA. What is not clear is how this would affect the system at the tertiary level (where NZQA also has a role). Does TEC take over NZQA's role at tertiary level? Or does this pass to the Education Evaluation Office?
The Teaching Council should include a new Leadership Centre to operationalise the Leadership Strategy and Capabilities Framework.	Yes	See above
The disestablishment of the Education Review Office (ERO) and New Zealand Qualifications Authority (NZQA).	Yes, conditional	The question of how the tertiary role of NZQA would be dealt with needs to be answered more fully. The

		transition also needs to ensure the considerable strengths and institutional knowledge of both ERO and NZQA are preserved in the new entity.
--	--	--

9. The Pace of Change

As stated above in the outline, we are concerned at the level of change proposed and the implication that all changes will be made at once.

The issues experienced after the introduction of Tomorrow's Schools in 1989 should demonstrate the risks in making sweeping change quickly. Already we can see significant risks with the proposed hub model if it is not implemented extremely well. There are also risks in the proposed changes to the central agencies.

More worryingly, there are bound to be risks and unintended consequences that will arise from the changes but that are not easy to identify in advance. We therefore recommend a staged process, including a trial of the hub model at a small scale for two to three years before wider implementation.