



**PSA Submission on**  
***Our schooling futures***

**Report by the Tomorrow's Schools  
Independent Taskforce**

**April 2019**

# **PSA submission to the Tomorrow's Schools Independent Taskforce on the Our Schooling Futures report**

## **About the PSA**

The New Zealand Public Service Association Te Pūkenga Here Tikanga Mahi (the PSA) is the largest trade union in New Zealand with over 70,000 members. We are a democratic organisation representing members in the public service, the wider state sector (the district health boards, crown research institutes and other crown entities), state owned enterprises, local government, tertiary education institutions and non-governmental organisations working in the health, social services and community sectors.

People join the PSA to negotiate their terms of employment collectively, to have a voice within their workplace and to have an independent public voice on the quality of public and community services and how they're delivered.

## **Our members in education**

The PSA represents over 1400 members working across four public sector education agencies: The Ministry of Education, NZQA, ERO, TEC and the Teaching Council. We also represent members working in Special Residential Schools.

This submission represents the views of members from these agencies, gathered through dedicated members' meetings and an online survey.

Our members across the union have an interest in strong, sustainable and well-resourced public services that support the needs of our communities and that provide decent working conditions for those people who deliver the services. We have encouraged members across the union to make individual submissions on the review.

## **General comment**

The Schooling Futures reports makes a strong case for change. It provides compelling evidence that the competitive, atomised and individualistic model of schooling introduced by Tomorrow's Schools has failed to lift student achievement or improve equity and needs reform. It has particularly failed

Māori and Pasifika children and many of our most vulnerable students and communities. It has not enabled a coherent and consistent approach to developing and supporting either school leadership or the teaching workforce. Many of the poor outcomes in the compulsory sector are not wholly due to governance structures; the persistent under-resourcing of both schools and central education agencies is a critical issue that needs to be addressed.

The PSA welcomes signals from this Government that it intends to shift away from neo-liberal approaches to the organisation, management and delivery of state services that were introduced in the wide scale public management reforms of the 1980s and 1990s, of which Tomorrow's Schools is a part. The review of Tomorrow's Schools is occurring in parallel with numerous other reforms in the education sector and with a review of the State Sector Act. The PSA supports new approaches to the role of the State that enable and empower communities through collaboration, and co-operation and with sufficient resourcing and support from a strong centre.

Notwithstanding our in-principle support for a new model of education provision, the PSA has some concerns about both the process for reform, and the substantive recommendations in the Our Schooling Futures report.

In our view the limited nature of the current review process is insufficient to allow for the public participation and policy development needed for reform of such an important public service.

While we agree it is important to have a part of the reform process led by an independent group with strong expertise, other elements are needed. We believe there would be value in the next phase of the review including a white paper process to enable policy development with strong public engagement. We are concerned the current review process does not make adequate provision for the voices of students to be heard or considered, and this needs to be addressed.

Our members working in central agencies feel that the services they provide have been somewhat diminished and undermined by the report. The proposals to disestablish NZQA and ERO and to replace Ministry of Education regional offices with education hubs are a cause of concern to the people who work in these agencies and who feel that the report is silent on the essential work that they do to support schools, whanau, students and communities. Too often, the invisible work of "back office" public servants can become a scapegoat for public sector failings that arise out of systemic rather than occupational weaknesses. Unfortunately, this sentiment seems to have been perpetuated in some of the taskforce's regional consultation meetings, where central agency workers have been repeatedly castigated as "deadwood". Not only is the report silent on the contribution these workers make but their future role in education services is also very unclear.

It's of concern to the PSA that another review of the education sector currently underway – that of Vocational Education and Training - similarly under-values the contribution of central agency workers to education services. Both reviews are heavily focused on learning institutions and their role and appear to minimise education sector agencies outside the traditional primary, secondary and tertiary learning institutions. This appears to undervalue the roles of on-teaching occupations and the importance of a whole a system perspective that equally values the respective roles across the education sector. We are concerned that this potentially reflects a lack of depth of knowledge of the broader sector beyond teachers.

Our members are committed public servants who are keen to contribute to improvements in our education services. Improvements are most likely to be achieved when their voices and insights are valued and welcomed as central parts of a future design process. We look forward to future engagement with the taskforce.

## Specific comments

In our consultation with members we asked them to identify:

- Their overall impression of the reform;
- What they liked about the proposed reform;
- What they didn't like;
- Any gaps in the review.

Verbatim members comments are attached as appendices to this submission. The following paragraphs summarise the key themes that arose in response to the questions above.

### Overall impressions of the report

On a scale of 1-5, with 1 being strongly disagree with the report, and 5 being strongly agree, most members self-recorded in the middle of the scale. Largely, members agree with the need for reform, and with the purpose and principle statements of the report. The report's focus on equality is evident, and was strongly supported by our members, particularly in relation to improving outcomes for Māori and Pasifika children, and for children with additional learning needs.

Members also agreed with the need to move away from the competitive model of Tomorrow's schools and support a more collaborative approach to education delivery. They also agree with the proposals to remove some of the administrative and management burden from Boards of Trustees and principals. They agree with the vision of a "level playing field" in the quality of schools that underpins the report.

While PSA members support the vision for education encapsulated by the report, there was unease about the ability of the proposed reforms to achieve this vision. Overall, the report suffers from insufficient detail on the operationalisation of some of its key proposals, including the education hubs. In addition, it inadequately canvases the full role and functions of the agencies which it proposes disestablishing, that is, NZQA and ERO, as well as the work of the regional MoE offices. Many of these agencies' functions seem to have been overlooked or minimalised, and in some instances, insufficient rationale is provided in the report to link the proposals with the desired outcomes.

Unfortunately, there has been little consultation with workers in these agencies as part of the review process. Many of the identified omissions in the report may have arisen because of the absence of worker voice. Consequently, members lack confidence in some of the reports' recommendations, in particular the disestablishment of NZQA and ERO, and the replacement of MoE regional offices with the education hubs.

## What we liked about the report

As noted above, members were highly supportive of the report's focus on equity. There was support for a broad range of the proposals including:

- Reforming the roles of Boards of Trusts to remove some of the more onerous administrative tasks
- Removing responsibility for appointing and employing principals from Boards of Trustees
- The provision of advisory services for teachers and leaders;
- A leadership centre
- The idea of continuous evaluation
- A shift away from the decile funding system
- Provision of improved teacher training.

## What we don't like about the report/what is missing

The proposals to disestablish NZQA and ERO and to replace the regional MoE offices with education hubs have raised significant concerns. Many of these concerns arise because members have identified significant gaps in the detail surrounding the report's analysis and its recommendations.

### **The education continuum**

There is little mention in the report of the full continuum of educational services, from Early Childhood Education through to tertiary education. Whilst we understand the focus of the report in the compulsory sector, and that concurrent reviews are underway that address other parts of the system, the apparent lack of connection between reviews is unsettling for members. Contextualising the compulsory schooling sector within the life-long journey of the learner would make the report more relevant to those members working in more than one sector.

### **The Education Hubs**

Members are very unclear about the role, operation and governance of the proposed Education Hubs. Some concerns include:

- That the range of functions carried out by MoE regional office workers have not been sufficiently canvassed and represented in the report; and that the future of these functions is absent in the report;
- The independence of the hubs, and any evaluation role they undertake may be compromised;
- The governance arrangements are unclear. There is significant concern the Hubs will replicate the DHB model which is not seen as been highly responsive to community needs;
- The risk of regional funding and performance inequities is high – as with DHBs. This could undermine a nationally coherent education system;
- The rationale for creating new crown entities – at greater distance from Ministerial control than the MoE - is unclear but creates risks. Risks includes the potential for hubs to be less responsive to changing government priorities.

- The proposed number of 125 schools in a hub. This might be achievable for cities but is not realistic for remote or rural areas. Distance and travel needs would need to be considered, and the number of schools changed accordingly.
- The potential for there to be a perceived conflict of interests within the hub in terms of an advocacy/complaints service. There should be another mechanism outside of the hubs where parents and others can go to seek independent complaint services.
- Hubs becoming siloed and disconnected from each other.

### **The disestablishment of NZQA and ERO**

The impacts and potential risks of the proposal to disestablish NZQA and to ERO are not sufficiently demonstrated in the report. In addition, members are concerned that:

- The current and future role of NZQA in the tertiary sector is not represented in the report, and the impact on the tertiary sector of the disestablishment is unclear;
- The integrity, independence and quality of evaluation services at ERO and NZQA will be reduced by locating these within education hubs.

### **Employment relations framework and relationships**

The report details an employment relations framework and relationships for teachers. It recommends disestablishing the employment relations framework and relationships for those currently employed by the Ministry of Education regional offices, ERO and NZQA but it does not sufficiently canvas what new arrangements would or should be put in place for people working in the support, evaluation and advisory functions currently undertaken by those organisations.

It is unclear whether each hub would employ the people working in these roles, which is similar to the current employment model for DHBs, or whether there would be one employer nationally. We would assume that these people should be public servants and employed under the State Sector Act – which is currently subject to a significant review.

It would seem that the report envisages that they would be appointed to a local hub and that the chief executive/director of that local hub would be their employer. There are many disadvantages to this model and few, from what we can see, advantages. Workforce and capability planning and terms and conditions of employment would be determined hub by hub. This is very inefficient and presumably any career, development pathways or workforce planning for these functions would be just as fractured and neglected as the DHB allied health and administration arrangements are currently. The PSA has some considerable experience of this as we have high membership in these areas.

The employment structure is very important. Our clear preference would be one national employer for the hubs. This would best support effective and efficient collective bargaining, strong employment conditions, workforce development, training and career pathways. We do not want to replicate the fiefdoms of the DHB system.

## **The Education Act 1989**

The review report does not mention the design or functioning of the Education Act. The Act could provide much greater clarity of function and purpose for the schooling system than it does currently. For example, the Act could include a statement of purpose for the schooling system – rather than just for the Act itself. It could set out the principles that guide the design and operation of the schooling system. It could set out the values that underpin it. It could make clear what the respective roles are of the Ministry, any other remaining education agencies, the hubs (if instituted) and schools in respect of giving effect to the Crown’s obligations under Te Tiriti o Waitangi.

## **The stewardship role of the Ministry of Education**

In the section on the “central education agencies”, the statement that the Ministry of Education exists to service the minister is an oversimplification. It ignores the Ministry’s obligations under the State Sector Act, of political neutrality, to give free and frank advice and the Secretary of Education’s obligation of stewardship.

## **Next Steps**

Responsibility for implementing any changes resulting from the review will fall to the Ministry of Education, which is currently subject to, we believe, 16 other reviews. To successfully implement changes to the schooling system the Ministry will need to be sufficiently resourced and free of internal change processes so that it can focus on this. In our considerable experience of Public Service restructuring, change takes considerable time to bed-in. Any consequent changes necessary to the Ministry’s structure should follow, rather than precede any changes to the wider schooling system they are charged with implementing.

Although much of what's proposed in the document is positive and necessary, whatever is designed may be in place for at least the next 30 years. Cross-party support is important for sustainability, but the inclusion of wider perspectives, and in particular those of students and the public interest, is also needed to help ensure our schooling system is fit for purpose now and into the future.

### **Continued engagement with the Taskforce**

We thank the Taskforce for making time for two of its representatives to meet with a representative group of PSA delegates from across the education agencies and we look forward to our continued engagement as the review progresses.

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# Appendix One: Feedback from one ERO regional office

## 1. Synthesis of PSA Hui 1/3/19 on 'Our Schooling Futures'.

ERO regional office.

### Question 1 – overall score –

1 x 0, 2 x 1, 3 x 3, 4 x 1, 5 x 0, unanswered x 2

Overall comments:

'Focus on equity' 'Consultation wide ranging and genuine', inquiry into the right areas', 'like the overall finding', 'the overall focus on promoting equity', 'focus on outcomes for learners and equity'.

### Question 2 - what did you like?

'Acknowledgement that independent evaluation is important', 'accountability functions is recognised', 'whole report is about equity', reducing the expectations on boards', more support for those with learning needs', 'the way it seems to discourage competitions between schools', 'the additional rigour in principal appointments and performance management', 'rationalising what could be centralised for schools governance'.

### Question 3. – what didn't you like?

'It is not right that the taskforce is processing the feedback', 'seems a waste of resources to set up a whole new evaluation agency when ERO has a history of being flexible, adaptive and responsive to change'.

'I can't see how these people (evaluators) could be objective if attached to a hub – what if people didn't like the findings? – the process is unclear'.

'Career pathways uncertain for employees within the evaluation sector'.

'That they have recommended ERO be disestablished. Even though they have recommended that there is still a place for evaluation, it has created job uncertainty for current ERO employees, some very new to their roles'.

'Didn't like the criticism of ERO in the report that our evaluators do not have relevant knowledge and respected within the sector. We are trained evaluators'.

'The objectivity that is necessary when evaluating school effectiveness. Evaluation still needs to be effective / objective but not necessarily reported publicly. ERO strength is in its reporting, it's weakness is that reports are made public and this seriously impacts on ERO's potential to make change'.

'It is a blunt instrument to fix 15% of schools – use or develop the current process properly!'

'Timeline too short for such significant possible changes'

'The assumption that Boards know about teaching / learning, curriculum'.

'5yr terms for Principals – blunt instrument for performance management.'

'Regional MoE offices already in place – how is this different from hubs?'

**Question 4 – gaps in review?**

'Unclear of the role of evaluation – this is important for accountability of expenditure and the professional growth of leaders, teachers and school'

'Sector voice !'

'How evaluation needs to be independent of hubs for accountability'.

'Although the report is focussed on schools, if ERO is disestablished the majority of our work is in ECE so what will happen with this? No details? This also needs to be separate from hubs and independent for accountability to the Minister about public spending '.

'More detail needed – will come with time?'

'No links with ECE – seems focussed on schools. ELS and schools closely linked'.

'Rebranding extensive costs.'"

'Report assumes that PLD providers are high performing when not all are'.

'The external objective eye would be lost if evaluation is attached to one hub (navel gazing).

'Who informed the data findings to disestablish ERO? (whose voice?) – how reliable/valid is this data to completely disestablish ERO?'

'Academics on panel are researchers. Evaluators and evaluators"'.  
"

'The possibility of ERO reviewers becoming internal evaluators employed by a hub'.

## Appendix Two: NZQA-PSA members feedback on

### “Our Schooling Futures: Stronger Together – Whiria Ngā Kura Tūātinini” report prepared by Tomorrow’s Schools Independent Taskforce

*Mā te whakaaro nui ki ngā whakatupuranga hou ā tātou mahi e ārahi  
Let our thoughts for the future generations guide what we do*

#### **Kupu Arataki**

The PSA members from NZQA would like to acknowledge the work that has gone into this review and its aim to make positive changes for our secondary learners. In saying this, our members are concerned that there is a disconnect between some of the findings of the report and some of the consequent recommendations from the report.

Of the feedback received from our members at NZQA, almost all thought it wasn’t all bad – in a scale from one to five, most of our members gave it a 2.5 or above. In fact, a number of our membership thought it was good (giving a score of 4), though that same number thought it was below average (a score of 2). None of our members gave a score of 1 or 5.

The above findings and further discussion at meetings suggest that PSA members at NZQA are not opposed to the issues identified in the report, nor to the ambitions and aspirations of the report. However, we do have grave concerns with some of the recommendations proposed to address the issues, as well as achieve the ambitions and aspirations.

Overall, we agree with some of the big-picture themes, such as:

- improved collaboration across the sectors
- reducing costs
- better resourcing of education outcomes
- more equitable outcomes for learners (especially for our Māori and Pasifika learners)
- more support for Boards of Trustees (so that principals and teachers can focus on teaching and learning)
- advisory service for teachers
- better outcomes for learners, and
- a better secondary education system.

However, the recommendations coming out of the review carry very big risks and may not necessarily achieve the outcomes desired.

*Tūngia te ururoa  
Kia tupu whakaritorito te tutu o te harakeke  
Set the overgrowth alight  
And the new flax shoots will spring up*

#### **The Disestablishment of NZQA (et al)**

The recommendation to disestablish NZQA has been described by one member as akin to “taking a sledgehammer to crack a walnut.” The structural reorganisation, as proposed in the review, is far too wide-ranging. Our members agree that the above are all sound ideas, but what we don’t agree on is how the functions NZQA carries out will be more effectively delivered if it is disestablished and

redistributed across the Ministry of Education (MoE), the education hubs, and/or the independent Education Evaluation Office (EEO).

The financial cost of the reorganisation would be huge, not to mention the enormity of the financial impact on members' lives should they no longer have jobs.

It is not clear how the disestablishment of the entire organisation will lead to the achievement of the review's aims for secondary schools. Most of our members believe the aim around student equality could be accomplished without disestablishing NZQA. In reality, some of the work we do involves addressing inequalities for our secondary learners. These functions could be further developed. Merging some of our functions into other agencies may carry other risks, such as conflicts of interest or issues around independent decision making. For example, in the tertiary sector, NZQA quality assures products that are funded by TEC. If this quality assurance function becomes part of the role of TEC, there is a risk that products may or may not be approved based on funding rules, rather than on pedagogical and educational quality outcomes.

Our members at NZQA would like to know:

- *How the disestablishment of the entire organisation achieves the review's aims for secondary schools?*
- *Whether our existing structures are considered broken beyond repair?*
- *Whether we are not considered to be performing as we should?*
- *How the disestablishment of our non-secondary services and functions help in addressing inequalities for secondary schools?*
- *How the functions under the proposed new model will be any more effective and efficient than they are presently? Especially NZQA's non-secondary functions, of which there are many.*

Over half of NZQA staff do not deal exclusively or directly in secondary education, so for them the disestablishment of NZQA would be an enormous disruption. Further, there is a lack of detail in the report (especially the recommendations) where one could be confident in a positive impact on secondary education with the proposed reorganisation. This is very much needed if such huge changes are to be made.

NZQA has been, and is seen to be, a highly functioning agency. The report does not outline how the non-secondary functions of NZQA will be carried out (or even if they will continue to be so) after its disestablishment. Moreover, the report doesn't appear to show much understanding of the complexity of NZQA and its functions, which is surprising. Again, the report lacks a lot of detail, which is necessary when such drastic changes are being proposed. There is no detail as to what will happen (and how) with NZQA's non-secondary functions (such as standard setting, quality assurance for tertiary, qualification recognition services etc).

This lack of detail is very concerning for our members. How can we be confident that the structural reorganisation proposed will have the desired outcome for secondary schools and not have a detrimental effect on the tertiary sector, when there is an apparent lack of consideration for tertiary education in the report? Is the lack of detail merely due to it not being included in the report or is it due to a lack of consideration given to the details? In either case, we would like to see that consideration has been given and the specifics resulting from it.

The PSA members from NZQA expect change in addressing the shortcomings of the entire education system, but challenge the taskforce to interrogate the perception that by disestablishing this organisation the issues identified by the review will be resolved.

*Ehara taku toa i te toa takitahi, engari he toa takitini  
Success is not the work of one, but of many*

*He waka eke noa  
We're all in this together*

### **Education Hubs**

The shift to geographical-based education hubs, rather than the current centralised operations of NZQA, raises more concerns. From what one can ascertain from the report, this could result in more (rather than less) disparity, because it appears unlikely that staff resourcing will be equitable. This assertion may, again, be due to the lack of detail in the report.

The notion of education hubs seems to follow the DHB model that the New Zealand government introduced in 2001 to reform the structure of the health and disability sector. This model has received a lot of criticism over the years and continues to do so. If the education hubs are to follow in the same vein as the DHBs, how has the taskforce ensured that the hubs will not be open to the same criticisms they face (ie what makes them better)? If the hubs aren't similar to the DHBs, how are they different?

Our members would like more information about the proposed education hubs and would appreciate answers to the following questions:

- *How will equity across the hubs be maintained (eg. is there capacity to staff hubs equitably across the country)?*
- *How will equity within the area of each hub be maintained (eg. between urban and rural distances within a hub)?*
- *Do we have enough resources (money and people) to establish and operate the hubs as described in the report?*
- *What role, if any, will these hubs have in the tertiary sector (if we are to acknowledge that secondary and tertiary training is merging)?*
- *What is the risk that these hubs will create education silos rather than pathways, and more division between secondary and tertiary?*

*Mā te rongo, ka mōhio; mā te mōhio, ka mārama  
Mā te mārama, ka mātau; mā te mātau, ka ora  
Through listening comes cognisance; through cognisance comes understanding  
Through understanding comes knowledge; through knowledge comes wellbeing*

### **Whakakapinga**

NZQA's members are not averse to change that provides a better education system, but we are averse to change when we can't see how that change will be effective.

Considering the experience and expertise (at strategic and operational levels) in the affected organisations, what consultation took place with them in the review? Was any consultation with staff in this review to co-design the new organisational structures recommended? Will co-design feature in any phase of the review moving forward?

At this stage it appears that this review is proposing the disestablishment of these education organisations without proper engagement with the organisations themselves. The published report raises concerns for people working within these organisations, as described above. Going forward, we ask that the taskforce engage with us and provide meaningful details as they are considered.

*He kura te tangata  
Our humanity is precious*

## Appendix three: summary feedback from Auckland based ERO PSA members' meetings

### Keypoints

- Our members agree with aspects of the recommendations – **general agreement** of the need for change – some of the systems of Tomorrow's Schools haven't either addressed or in some cases have increased the inequity of students in schools – changes to systems need to focus on a more equitable society where there is no disparity.
  - The recommendations are very light on detail as to how they will address these issues through a change to the current model
  - Members' greatest concerns are around any model that doesn't address the high levels of inequity in student outcomes
  - An area very well identified by your team and agreed to by our members, is around the under-resourcing of ERO being able to carry out the number of contracted reviews yearly. This is also a huge concern for all of the members. Is the suggested recommendations going to address this issue?
  - What happens for monitoring and accountability with the variety of schools (private, teen parent units, residential schools) and public funded kindergartens? Pathways and transitions?
- Our members are particularly concerned about the 'perception' identified in the report around ERO's methodology and the perceived weighting placed on documentation. The methodology used by reviewers is published on ERO's website and has an equal balance of evidence being triangulated through what is heard (discussions), what is seen (observations), and what is read (documentation).
- A major function of ERO is its monitoring and accountability to the government and tax payers
- Our members feel very passionately that in order to evaluate, or as Scriven defines it as to *determine the merit, worth or value of* school systems and processes, they need to remain independent and external to the education institutions. They feel that being in an **advisory role** rather than having an independent role will create conflicts of interest when determining the quality or effectiveness of policy and practice on outcomes for students.
- ERO needs to maintain its independence as external evaluators. How can ERO make reliable judgements about the merit and worth of policies and practices on outcomes for students if they are working as fellow schooling professionals
- As identified by your team the ERO national reports give a big picture view, and provide examples of good/effective teaching and learning practices. The implementation of new initiatives requires careful monitoring and scrutiny around the effectiveness on outcomes for students. A more useful process is with identifying outcomes for individual schools rather than larger scale data analysis for a big picture view. At present reviewers particularly TUAM, turnaround school reviewers work nationally
- Members are concerned about the impact of hubs as increasing competition rather than publishing individual reports. They see that hubs as proposed, and with a lack of detail as to how they will operate, as creating a further level of bureaucracy and competition between

hubs. Consider the perception of decile ranking as a measure of quality education and the competition to be in the “right decile-ranked” school.

- Members agree that to collect data about the performance of the schooling system we need consensus on what success at school looks like. ERO’s evaluative indicators based on current research and theory goes somewhat into identifying good performance across areas wider than purely achievement.

## Appendix Four: Members' Survey

A sample of members' responses to the survey questions:

### 1. The report makes recommendations about the future of education agencies. What reflections do you have about these recommendations?

"The establishment of 20 hubs seems like a massive duplication of bureaucracy and diversion of resources away from frontline teaching. It seems to follow the CHE/DHB model that has been unsuccessful for Health outcomes. It also doesn't seem to address inequalities. There will still be silos of outstanding or poor performance based upon geography or demographics, but now they will all be concentrated together under a hub, how will that improve anything? How will consistent application of practice between hubs be maintained? Again resource will be diverted from front line activities to monitor the hubs, but I can't see how they will improve outcomes for a significant extra cost. There will still be pockets of better/worse governance, they will just have sway over larger catchments." (member MoE)

*The recommendations lack proper understanding of how these central education agencies work. NZQA's work extends beyond the schools and it is a regulatory body for tertiary education sector as well. To abolish an organisation such as NZQA is not going to fix the problem. The report uses overlapping functions between these agencies to recommend re structure/abolishment. It is perfectly normal and efficient to have multiple agencies handling the education work. Collaboration is not a bad thing. It is the best use of the expertise available from different agencies. Centralised system doesn't always help increase the efficiency. It has its own limitations.* (member NZQA)

"The recommendations to provide advisory services to regions and teachers, and to provide advice to Principals and reduce the workload of BOTs are sound. - - If the HUBs are well run and develop credibility with the profession, and across the regions as advisers who help out, this will provide a sound new direction. Currently there is too little of this kind of advice and it is remote from the areas of need. - - If they are not effectively managed or valued as career pathways by those that work within them then they risk becoming another layer of bureaucracy" (member, NZQA)

*"The recommendations don't sufficiently justify the benefit that will be gained by scrapping ERO and NZQA, and I don't believe it takes into account the breadth and uniqueness of the work that NZQA does, for example, with international students and pastoral care etc."* (member NZQA)

It sounds like the education hubs will need about 100% more staff than we have now. If we were just resourced well, then we could do a great job of everything they are saying isn't good enough. (member, MoE)

*The key to the success of any change is communication, adequate resourcing, structure and integrity of process. - I agree with some of the points raised under #8 'Central Education Agencies' - inadequacies in the current structure - responsiveness, future proofing, resourcing evaluations etc. - I wonder if a new and independent EE Office will have the ability to address all of these problems? It sounds promising but is dependent on the above criteria (success) being met as well. What reassurances can be given that funding will be adequate for the job?*

*Will the new proposal be adopted? All or some? How will that new reality look? - Difficult to assess just from the report provided. (member, Special Residential School)*

*“Generally sound, logical based on their identification of the issue” (member, ERO)*

*“I believe that the sector needs external evaluation - it's part of checks and balances. There is some sector discontent with ERO's work. May I be so bold as to say that some of this discontent stems from ERO's miserable and every reducing budget. We are not resourced appropriately to do an effective job. If we want money we have to go cap in hand to MoE for national/systems work and then we make recommendations that they don't like...’ (member, ERO)*

## **2. What do you think the report has got right?**

*“Decentralization has manifestly failed. Some communities simply lack the resources and expertise/experience to effectively run a school that can meet the teaching, learning and social demands of the 21st Century.”*

*“Appointment of leadership advisers in Education Hubs to work closely with principal, this is a good recommendation and might work in the long run. Also focus on recruiting diverse staff in schools will help build intercultural competency and will meet the diverse needs of the learners.” (member, NZQA)*

*“Advice, Guidance to teachers, BOTs and schools. Equity considerations. a major reinvestment in regional education authorities if it is well run.” (member, ERO)*

*“Community input into a school only works where there is a functioning and well resources community. Allowing each school to have its own character means that some are excellent and some are terrible. I think we have to go back to a mindset that every local school will be essentially the same, and that means that know you can go to any school and be successful”. (member, MoE)*

*“In my experience it has to do with the BOT model. This has always been a challenge for Special Residential Schools as we cover such a wide geographical area and struggle to get those with experience and qualifications in finance/legislation etc. - We do not have a 'local community' to draw from. - Again, I ask how parent view might be represented and how the model designed for mainstream education will be adaptable and responsive to the very differing needs of these schools? How could a BOT governing mainstream schools suddenly accumulate the knowledge in the vast differences inherent in our operation? It is complex. - I do not think even many at the MOE understand in depth what we do.” (member, Special Residential School)*

*“Flexibility around staffing across schools to move quality staff where they are needed. - Less pressure on school boards and theoretically more consistency nationally, although with so many hubs that may not be the reality. - Learning support co-ordinators in schools”. (member, MoE).*

*“Identifying that some school boards need support with management. That some schools complete with each other. That teachers need to be more collaborative. Some children are not doing well in our education system. “ (member, ERO)*

“There are some aspects of the BOT responsibilities that Ministry should have a greater influence in, These are the appointment of Principals, Finances and Property. The Ministry should have a representative involved in appointment process or perhaps provide a first class recruitment programme/service that is compulsory for schools to use.” (Member, MoE)  
*“Mechanism to have a 5 year cycle of principals if needed. - Taking property away from schools - Principal appointments will be made by informed educators - Leadership support - Advisory support” (member, MoE)*

“Family and community centric ethos is the heart of early childhood education and curriculum. It is good to see the intent behind the hubs is more holistic educational delivery for students. - Some of the inclusive education practices are good e.g. te reo Māori provision.” (member MoE)

### **3. If there is anything in the report you disagree with?**

“If MoE regional offices are disestablished, what happens to the ECE licensing and monitoring functions that they currently undertake. The report has completely ignored these activities assuming all the work the regional offices do relates to schools.” (member, MoE)

*“Not sure about disestablishing existing Crown Entities and creating 'smaller Crown Entities' as surely having a large number of smaller entities would be very costly, and their performance would still need to be monitored. Would this happen through the centralised education leadership agency at the Teacher's Council? “ (member, NZQA)*

“A lot - but I'll try and keep it succinct and I'll focus on NZQA. My concern is that it is very high level, and does not justify the recommendation to disestablish NZQA, and does not take into account the losses of expertise that are already occurring due to staff leaving out of fear that their positions will be disestablished. The report does not seem to be factually based, and instead seems to have an emphasis on anecdotal evidence. There is no information about the costings.” (member, NZQA)

*“Around 1989 the Picot Report gave us 'Tomorrows Schools' which gave autonomy based on a business model. Autonomy now will be revoked with responsibilities being reassigned. For some of the powerful schools this will be a big sticking point so I guess it depends where you sit in the education framework. For a Special Residential school currently going through a comprehensive change process (merger) there are more questions than answers at both a local level and now a national level. Community meetings have been widely spread with short notice. How can we feel included in discussion when this is happening at the beginning of the consultation. More of a concern than a disagreement really. I cannot see how sharing staffing (element of choice?) will provide better outcomes - sharing knowledge certainly. - If schools were more equal then that would be reflected in staffing availability.” (member, Special Residential School)*

“I am concerned that schools that are currently doing really well will not do so under the proposed changes. In short we will unintentionally create a new set of 'winners and losers'.” (member, MoE)

*“I don't like the idea of a Kura Kaupapa hub - other hubs would be geographical, but the Kura Kaupapa one would be across the country. It raises the risk of isolationism. It's also not easily*

*expandable - I'd love to see more schools embracing te reo etc - if there's only one hub that deals with it, how easy would it be to welcome more schools to the fold?" (member, MoE)*

**4. If there are gaps in the report that you think need to be covered, please tell us about that here.**

*"It doesn't really address how we will improve the performance of less successful schools or address how to improve the quality of education at current low decile schools, or prevent higher clusters of high or low performing students at certain schools." (member, MoE)*

*"There is little and insufficient justification for the scrapping of NZQA, lack of factors that need to be considered before making this decision, and lack of rationale over where the functions of NZQA could be moved to. I.e it would be highly inappropriate to move NZQA into TEC, a funding, body, which could lead to conflicts over NZQA's quality assurance, and how pastoral care of international students would fit within an organisation that funds for education to domestic students. - - The report seems to be all about schools, and seems to randomly jump into a recommendation to disestablish NZQA. " (member, NZQA)*

*"Details! It is too minimal in this aspect. This is a huge change for tamariki, whānau, community, public service employees etc" (member, MoE)*

**5. Anything else you think we should share with the review Taskforce?**

*"There is insufficient explanation of how the proposed solutions will achieve the sought after outcomes; - • the rationale for the disestablishment of regional offices of the Ministry of Education is unclear and the report fails to articulate the full range of functions undertaken by these offices and the future of these functions; - • the report minimises the important work done by our members across the education sector and has created a great deal of unhappiness and anxiety as to whether there is a role for this work in the future. - • The establishment of regional hubs could cause unforeseen consequences – such as regional inequities, lack of national coherence, loss of autonomy for school boards and school leaders, and the risk of increased bureaucracy instead of less for schools." (member, MoE)*