



7th April 2019

New Zealand Principals' Federation (NZPF) Submission on the

Tomorrow's Schools Report

To: The Ministry of Education

Personal Details:

Agency: New Zealand Principals' Federation (NZPF)

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The New Zealand Principals' Federation (NZPF) is the largest professional organisation for lead educators representing the interests of 2,000 Principals of Primary, Intermediate, Area and Secondary Schools. Principals are from public, integrated and independent schools and are spread throughout New Zealand. NZPF aims to be the most influential advocate for school principals to enable high quality, well supported leadership for school learners in New Zealand.

We thank you for the opportunity to comment on the proposed Tomorrow's Schools Report.

General Comments

NZPF welcomes the opportunity to submit comments on recommendations contained in the Tomorrow's Schools Report. We have independently conducted our own survey of New Zealand School Principals and held a moot of regional Principals' Association presidents. The views contained in this submission are therefore reflective of the school regions, the NZPF membership, and the NZPF national executive members.

Purpose of the Tomorrow's Schools Report – Addressing Educational Inequity

The Tomorrow's Schools Task Force set out "...to focus on developing a system that promotes equity and excellence and ensures that every learner achieves educational success. This includes the ability of governance, management and administration of schooling to meet the needs of all New Zealanders, the environment in which schools operate, and how to give active expression to Te Tiriti o Waitangi."

NZPF applauds the aspirations contained in these statements. At the same time, NZPF expresses caution that we would expect our education system alone to achieve these lofty goals. Inequities are endemic to many aspects of our society and can be observed in the disparities in social and cultural capital, health and mental health, poverty, housing, income, employment and crime, as well as educational outcomes.

It is important to note that schools are a reflection of society's inequities. They do not generate them and neither can they fix them on their own. To address these inequities will require a substantial effort, including substantial funding increases in health, housing, wages and rehabilitation, as well as significant increases in school operations grants.

Background and Context

The past decade or more has seen a negative shift in the relationship between schools, the government and their agencies. It would not be overstating the position to say that the introduction of national standards and culture of accountability, in turn, generated a culture of profound mistrust. The profession was frequently heard to object that their views were not heard and that they were continually being 'done to' rather than invited to feed into education policy and systems. Morale diminished and it is fair to say, the profession hit an all-time low.

That is the context into which the Tomorrow's Schools Review enters. Despite the new Government, immediately on taking office, honouring its promise to abolish national standards and charter schools and quickly reversing legislation to allow teachers to democratically elect the members of their own Teaching Council, the culture of scepticism and distrust remains.

The statements and commentary that follow will thus, in part, reflect a reticence on the part of principals to trust and embrace new ideas at face value. The concept of 'hubs' for example, recommended in the report, evoke images of "bureaucratically bloated" Regional Education Boards, a long-rejected entity which represented powerful central control.

Schools want to retain autonomy and local control even if that means accepting elements of competition between schools. There is no appetite to return to or even concede small elements to central control, when they have enjoyed high levels of autonomy for the past 30 years.

Collaboration

The report also addresses collaboration, justifying the establishment of geographically situated 'hubs' so that expertise can be shared across schools. Responses to our survey and from our moot participants each reflect scepticism that collaboration through 'hubs' may be forced from the 'centre' rather than 'optional' and therefore yield little that is helpful. This is another example of the reluctance to accept that 'hubs' should be any more than service centres for curriculum advice, principal leadership advisors, business support and learning support services.

Equity for Māori and Pasifika

In acknowledging inequity as a driving force for the review, it is surprising that more has not been made explicit about inequities for Māori and Pasifika through racism and unintentional bias. It is our belief that the report needs to have a much stronger statement of intent for Maori and recommendations as to how racism and racial bias will be addressed in schools.

Changes Need to be Evidenced-Based

To significantly improve our education system, any change needs to be evidence-based or evidence-informed. Most of the premises and recommendations in the report are based on national statistics, internal government publications, newspaper articles, anecdotal evidence, and some journal articles. Although the use of these sources is encouraging, it does not go far enough. In particular, the Taskforce could have utilised more international evidence and scientific research articles to inform their decisions. There also needs to be a clearer distinction in the report between evidence and the inferences made by the Taskforce.

The report contains phrases like "we heard" and "too often." These phrases don't accurately convey the extent to which there is agreement with a statement, or the frequency of something. Does "we heard" correspond to a majority opinion or does it mean at least one person said something? The report needs to further clarify these phrases. Regardless of this lack of clarity, anecdotal evidence should be used to supplement empirical evidence, not as a substitute for empirical evidence. Compiling common themes and views may lead to a set of recommendations that are popular, but not necessarily proven to work.

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Part of an evidence-based approach is not only finding evidence for the problems in the current system, but also finding evidence that the proposed solutions work more effectively. Where possible, we would like to see more evidence presented to justify the recommendations. If there is little or no evidence for a recommendation or statement, that should be made clear in the report.

Competition

The Tomorrow's Schools model theorised competition would raise overall school quality. The report states that "the emphasis on competition between schools in Aotearoa New Zealand has not improved the quality of education overall." But it would be misguided to think changing the Tomorrow's School model would remove, or even reduce, competition between schools. So long as there are distinct entities and groups, there will be competition. Even if creating Hubs does reduce competition between schools, it will create new forms of competition, such as competition between Hubs. More careful consideration should be given to how inevitable competition may undermine the purpose of hubs and how this competition could be channelled in a positive way.

Can the Proposed Solutions Address the Issues Raised?

The report needs to further consider some of the issues raised and the ability of a governance structure to solve these issues. For example, the problems of variability in skills and experience of Board of Trustees members will translate to variability in skills and experience of Hub employees; the problem of Board of Trustees members with personal agendas will translate to the problem of Hub employees with personal agendas; and the problem of political influence will persist with hubs. Changing the governance structure alone will not eliminate these issues, unless there are specific processes introduced to deal with them. Therefore, the report should address how people will be employed to the hub in order to exclude those who do not have the required skill or have a personal or political agenda.

Further Consultation and Immediate Actions

Many of the recommendations presented in the report lack detail, or specific information about how they would be implemented. Therefore, NZPF's position on these recommendations are conditional on further details. We also strongly encourage continued collaboration and input from educators before any changes are implemented. But at the same time, there is consensus within the NZPF membership that funding and resourcing of the current system is inadequate. Extra funding across the current system may also solve many of the issues mentioned in the report. We therefore recommend funding under the current system should first be increased. At the same time, consultation with educators should continue in order to improve the specificity of the report and the issues raised with the recommendations.

Our remaining comments in this submission are structured around the 8 sections of the Tomorrow's Schools Report.

Section 1: Governance

The Role of Boards of Trustees

NZPF recommends that the existing governance model of one Board of Trustees for each school be retained. In addition, we recommend that boards have the option of co-opting additional expertise, or members, as required from a designated pool of experts. In this way, all Boards of Trustees for all schools could adequately fulfil their governance obligations.

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Under this model, Boards would also have the option of accessing resources as required. These might include, property advice and support, financial management, Health and Safety compliance, school policy development, Human Resources management, and utilities management. Boards would continue to have responsibility for employing principals. If principals were employed by Hubs, they might be, or feel as if they are, unable to speak up against government initiatives.

The NZPF recommends that Boards of Trustees should not be reoriented to provide professional education advice to principals, such as advice on curriculum and assessment. Boards should provide principals with local community and cultural advice and ensure the schools retain their own unique identity and autonomy.

Hubs

NZPF would not welcome a further layer of bureaucracy into the schooling system and would not welcome Hubs if they were of that form. NZPF recommends that Hubs be described as a collection of helpful support services and would also have responsibility for compliance issues, such as school evaluations, national education learning priorities, and national education system performance. In addition, Hubs should be flexible enough to support the individual characteristics and differences between schools.

Hubs should be independent Crown entities governed by a majority of professionals elected by the profession, not by a board appointed by the Minister of Education. Furthermore, there should be an officially recognised training procedure for those who are on these boards.

Support Services

Principal Leadership Advisors (PLAs). NZPF recommends that PLAs would maintain the provision of services they currently offer, by continuing to support beginning principals. In addition, we recommend the service be extended to support experienced principals. We would expect PLAs to also be available to conduct principals' appraisals as required, whilst retaining the option of principal peer appraisal. PLAs would help oversee these more flexible appraisal options. To fulfil these duties NZPF expects the number of PLAs would need to be substantially increased.

Teaching and Learning unit. NZPF strongly supports the establishment of a teaching and learning unit to provide assessment and pedagogy advisory services.

Business Support Services Unit. NZPF supports the establishment of a Business Support Services Unit for 5YA property funding; advice and support on HR and Health and Safety and digital technology; property maintenance; accounting services and financial reporting.

Legal Responsibilities and Liabilities

NZPF does not support the transfer of all legal responsibilities and liabilities over to Hubs. These, like other responsibilities, could be retained by Boards if they chose.

Student Suspensions, Exclusions, and Expulsions

NZPF agrees that suspension, exclusion, and expulsion processes should be fair for students and students' rights should be upheld. We would not welcome this recommendation if it limits the ability of schools to provide input into suspension, exclusion, and expulsion processes. We therefore require more details on how the hub would manage these processes, and what "working with the school principal" would look like.

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Advocacy and Complaint Services

NZPF supports the recommendation for Hubs to provide advocacy services for students and parents. We also support a restorative and collaborative approach to addressing complaints. These advocacy services should also advise and support principals through the complaint process.

Management of the Schooling Network

NZPF supports Hubs having the responsibility of reviewing enrolment schemes and managing the schooling network, including closures and mergers.

Performance Monitoring

NZPF supports Hubs monitoring and providing support for schools. Public reporting of data should be aggregated to avoid unhealthy competition between schools and ranking of schools through generation of league tables.

Power to Dismiss Boards

NZPF recognises that occasionally Boards of Trustees can underperform, which can have a negative impact on principals, teachers, and students. We also recognise that in some cases, dismissing a Board may be justified and necessary. The report needs to clarify how the proposed procedure and mechanisms for dismissing an entire Board or a Board member will be different to the current procedures. What issues with the current system will be fixed by transferring the power to dismiss Boards to Hubs?

The Configuration of Hubs

NZPF recommends that the number of schools each hub works with would depend on various other factors, such as the number of students attending the schools, geographical location, the demographic makeup of the schools, and the schools' needs. Above all, the configuration of Hubs should be setup so they are responsive to local needs, that they understand the community, and that smaller schools are not forgotten in large hubs.

Five-year Principal Contracts

NZPF does not support five-year principal contracts. A five-year contract may not be enough time for principals to create and sustain major changes at a new school and the living and employment uncertainty caused by these short contracts would be detrimental to principal hauora. We also think some principals who are successful in one school, may not be as effective in another school located in a different context.

NZPF does support mutually agreed upon secondments for principals.

The Establishment of an Education Evaluation Office (EEO)

NZPF supports the establishment of an EEO. The EEO should not evaluate individual schools, but should provide parliament and public with regular reports about education and Hub performance against KPIs, outcomes, processes, and relationships. The EEO should use a wide range of measures, such as student progress, wellbeing, and school culture, to give a holistic evaluation of hubs and schools. Moreover, these evaluations should be used to support and empower hubs and schools to strive for improvement.

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Section 2: Schooling Provision

Kaupapa Māori Schooling

NZPF recommends the establishment of a Māori language plan to build capability and capacity to support phased te reo Māori provision for all students.

NZPF strongly commends the report's intentions to uphold the obligations under Te Tiriti o Waitangi. But we don't think one Hub dedicated to Kaupapa Māori schooling is enough. Initially, we recommend creating multiple Hubs dedicated to Kaupapa Māori schooling in order to better capture regional and geographical differences. Multiple hubs based on geography will also make collaboration between schools easier. These Hubs should be designed by Te Rūnanga Nui o Ngā Kura Kaupapa Māori and Kura-ā-iwi. As the number of trained Kaupapa Māori educators increases, we should aim to have a dedicated Kaupapa Māori team in each Hub to support both TKKM and mainstream schooling.

Te Kura

NZPF recommends increasing funding for Te Kura and establishing a specialist Te Kura support unit for each Hub, in order to provide learning expertise and resource development for schools.

Flexibility of Schooling Provision

NZPF supports Hubs working with communities and schools to design flexible curriculum and assessment offerings for schools.

School Transitions

NZPF recommends that transitions in our schooling system remain flexible and responsive to student and community needs. Therefore, we do not support a schooling provision that does not accommodate Year 7 and 8 intermediate schools.

NZPF also supports work to be undertaken to ensure that student transitions between schools are as seamless as possible as they progress through the education system. This might include improved sharing of student records across schools. This information should be used exclusively for teaching and learning and the sharing of learning support needs so that students can engage positively at school and succeed.

NZPF would not condone the recording of personal student notes which might later limit a student's ability to obtain employment.

Section 3: Competition and Choice

Whilst NZPF supports the recommendations to reduce unhealthy competition between schools, it supports parents and students retaining the right to choose their school. Schools should retain their autonomy and reflect their unique differences. Therefore, proposed changes should consider the impact on autonomy and uniqueness of schools—particularly integrated and special character schools which may attract students from a wide geographical range, beyond that of a hub.

NZPF supports fairer enrolment schemes in order to reduce unhealthy competition. This may include capping out of zone enrolments.

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School Donations

NZPF supports the recommendation for consistent wording of donation requests so that their voluntary nature is clear.

NZPF is unconvinced that introducing an upper limit on school donations would provide more equity in student and parent choice. Presumably, because donations are voluntary, those parents experiencing financial hardship would choose not to pay the donation—even if there was an upper limit. NZPF disagrees that a fixed numerical limit is equitable because it does not take into consideration the parents' income and financial situation. What might seem like an affordable donation to one parent may not be for another. It's likely those parents willing to pay more than the upper limit will find alternative ways to donate that money, such as through alumni associations and donating non-monetary resources. We think this inequity of choice would be more effectively addressed by focusing on reducing poverty, not by changes in the schooling system.

Section 4: Disability and Learning Support

NZPF recommends that funding and resources should be increased to support schools to educate students with disabilities and special needs. This increase in funding should be a priority before changes in governance. These changes should include, but are not limited to, Hubs employing specialist learning support staff, RTLB, RT lit, Teacher Aides. We strongly support ensuring all schools have a SENCO with a FTE role.

Section 5: Teaching

NZPF recommends that newly trained teachers who meet the standards should be guaranteed employment for the first two years. We suggest following a process similar to the APPA PCT project.

NZPF supports the recommendation of a review to increase teacher quality. This review should consider how high-quality teachers can be retained.

NZPF supports the recommendation to ensure the diversity of teachers closely matches the diversity of students.

NZPF supports the recommendation to have more flexible guidelines for teacher appraisal.

Section 6: School Leadership

NZPF supports the establishment of a Leadership Centre within the Teaching Council that would provide leadership training and mentoring, educational seminars and research, and culturally appropriate pedagogy training (particularly Māori pedagogy).

NZPF would welcome the opportunity to be further involved in the design and establishment of this Leadership Centre.

NZPF supports a review of the formulae for principals' salaries to take into account a wider range of variables, such as school complexity and challenges. We suggest further consultation with the NZPF membership in order to create formulae that are reflective of the amount and quality of

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work principals are doing, while also reducing the undesirable consequences of unhealthy competition on students.

Section 7: Resourcing

Establishment of an Equity Index

NZPF supports the establishment of an equity index (of at least 6% of total resourcing) that would go to schools to support students with the greatest disadvantage. This equity index should be determined by the number of 'at risk' students at each school.

Funding Equity for Primary and Secondary Schools

NZPF supports the recommendation to review staffing entitlements and management resources to ensure there is alignment and coherence across primary and secondary schools.

General Resourcing

NZPF strongly recommends increased funding across all schools.

Section 8: Central Education Agencies

Reconfiguring the Ministry of Education

NZPF supports the establishment of a Curriculum, Learning, Assessment, and Pedagogy unit and a Research unit.

Expanding the Teaching Council

NZPF supports establishing a National Leadership Centre within the Teaching Council.

Disestablishing NZQA and ERO

The NZPF membership was undecided on the recommendation to disestablish NZQA. The report did not explain how distributing the functions of NZQA across the Ministry of Education would have any influence on teachers and principals. In order to make a more informed decision on this recommendation, we would need to know about how these functions would be distributed across the ministry and an indication of any changes to funding for these functions.

NZPF supports the disestablishment of ERO and supports the establishment of a new Education Evaluation Office.

Thank you again for the opportunity to comment on the Tomorrow's Schools Report.

Yours sincerely,

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