



Report: Policy decisions on Initial Teacher Education following targeted sector consultation

To:	Hon Erica Stanford, Minister of Education		
Date:	27 September 2024	Deadline:	4 October 2024
Security Level:	Budget Sensitive	Priority:	High
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Why are we sending this to you?

- We are seeking final policy decisions on your proposal to shift Initial Teacher Education (ITE) functions from the Teaching Council to the Secretary of Education, following a short period of targeted stakeholder consultation.

What action do we need, by when?

- Your decision to proceed is being sought by 4 October. This initiative forms part of your Education and Training Amendment Bill 2 (ETAB2) package and will go to the Social Outcomes Committee (SOU) on 13 November.

Key facts, issues and questions

- While described as a 'lift and shift', this proposal would result in new powers, responsibilities and obligations for the Secretary and a narrowed set of functions for the Teaching Council (the Council).
- Most stakeholders opposed the proposal or provided negative feedback. 9(2)(ba)(i) [redacted]. Feedback largely came from ITE groups. Principals and teachers were underrepresented. Students, parents and whānau were not consulted.
- This brief presents three pathways to consider following consultation:
 - Proceed with the 'lift and shift' proposal with no change.
 - Proceed with the 'lift and shift' proposal with small changes to address some issues raised.
 - 9(2)(f)(iv) [redacted]
- If your key objective is to give Government direct levers to influence ITE programmes and therefore outcomes, then you may choose to proceed with the proposal. However, we recommend if you proceed, you include amendments to address some stakeholder concerns, noting the proposal will still likely receive significant stakeholder pushback.

9(2)(f)(iv) [redacted]

Alignment with Government priorities

1. This report supports your Priority Four: Improved Teacher Training: Developing the workforce of the future, including leadership development pathways.

The ITE system is not currently meeting your objectives

2. We have previously briefed you on the variability in confidence and capability in classroom practice, pedagogy and content knowledge of new graduates, as well as different expectations on their knowledge and capabilities (METIS 1329069 refers).
3. The ITE system is not currently meeting your objective to set all teachers up with the knowledge and skills to succeed in the classroom or early learning setting.
4. To support graduate preparedness, you have identified that a key priority is to effectively align ITE with your broader objectives for the education system, including across curriculum, assessment and PLD. The current regulatory system for ITE provides government with limited (by design) levers to achieve this or directly intervene to address the quality and consistency challenges identified. There are a number of agencies involved in quality assurance, funding and delivery. ITE standards are set by the Council.

Consultation

5. From 30 August to 20 of September 2024, the Ministry engaged in targeted consultation on the lift and shift proposal. We reached out to 29 groups. We met with 11 groups and received written submissions from 19 groups (see Annex One). A large number of the groups who contacted us were associated with the delivery of ITE. Principals and teachers were underrepresented in the groups who responded to our request for feedback. Students, whānau and the general public were not consulted. Annex One sets out an overview of who we consulted. Given time constraints, we prioritised engaging with the ITE sector due to the direct impacts of the proposal on them. If the proposal proceeds, full public consultation will occur through the select committee process.
6. Stakeholders engaged with us on the understanding that we would report their views back to you. We are providing this information as part of a robust decision-making process. Annex Two summarises the feedback grouped by theme, including direct quotes. Full written submissions can be provided to your office if you would like to see these.
7. The key themes raised in feedback were:
 - Mixed support for evidence of problem and disagreement with the proposed change.
 - The potential for politicisation of ITE and consequences of losing independence from government.
 - Loss of engagement and sector voices and associated expertise.
 - Loss of 'teaching as a profession' and impact on its status and future supply.
 - Need to ensure ongoing and meaningful engagement with Māori.
 - Implementation concerns and operational impacts if this goes ahead including the pace of change, capability and capacity of the Ministry, and costs for ITE providers.
8. Stakeholders were also asked about alternative ways to meet your objectives, or suggestions to improve the proposal. These suggestions are also included at Annex Two.

Pathways to proceed following consultation

The table underneath outlines three pathways to consider following consultation.

9(2)(f)(iv)



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Recommendation

9. Stakeholder consultation has highlighted risks with proceeding with the 'lift and shift' proposal. The sector raised significant concerns about the underlying rationale, whether the Ministry was the right organisation to take on these responsibilities, and the potential disruption to work that is already underway to improve ITE outcomes, including ongoing work of the Teaching Council. Consultation also brought out the impact that changes to functions would have on the role of the Council as the professional regulator, including the link between their registration and standard setting functions and ITE, and concerns about coherency of the system.
10. 9(2)(f)(iv) [Redacted]
11. This is a critical decision that needs to balance making system change quickly, against the feedback you have received and alternative options to achieve your objectives. We will deliver on your preferred approach: either the 'lift and shift' 9(2)(f)(iv) [Redacted].
12. 9(2)(f)(iv) [Redacted]. Annex Three sets out the timeline for Cabinet decisions, if you proceed with the 'lift and shift'.
13. 9(2)(f)(iv) [Redacted]. We heard from the sector that they are prepared to change, but that they do not support the current proposal.

Risks with 'lift and shift' proposal

14. Depending on your decision, we will need to carefully consider the feedback received and the risks identified if implementing the 'lift and shift' proposal. Despite calling it a 'lift and shift', this is not a straightforward movement of functions between organisations. It would be a reduction in functions and powers of an independent statutory organisation and creation of new functions and powers in a Government agency.
15. Beyond the legal changes required, there are organisational challenges as the people and resources do not exist at the Ministry nor can they easily be shifted from the Teaching Council. It will take time to build this new function, and will have funding implications. Stakeholders indicated scepticism in the capability and capacity of the Ministry to deliver these functions.
16. The term 'lift and shift' reflects the policy decision to narrow the scope of the change and not create new powers or functions at this time. 9(2)(f)(iv) [Redacted]

17. To address some of the key concerns raised in consultation – namely loss of sector voice and capability and capacity of the Ministry to perform this function, we have proposed two amendments to the lift and shift proposal: requiring public consultation and an ongoing voice for the Teaching Council in ITE standard setting and approvals. We recommend these additions, if you choose to progress with the 'lift and shift'.

18. The table below expands on some key risks and proposed mitigations which we will need to work through if you proceed with the 'lift and shift':

Risk	Potential mitigation
Fiscal risk	
<ul style="list-style-type: none"> Ministry of Education will require funding to perform new functions as it can't directly cost recover through fees and levies in the same way the Teaching Council can. Legislation will be progressed without budget approval. These functions are mandatory for the ITE system to operate effectively; if unfunded, there is a high risk that any changes to standards and approvals could not be progressed. 	<ul style="list-style-type: none"> 9(2)(f)(iv) [redacted] The Ministry will look at different operating models for the ITE approvals and monitoring function to determine possible models that will most fairly allocate costs between all parties. 9(2)(f)(iv) [redacted]
ITE sector disruption	
<ul style="list-style-type: none"> Current ITE standards and approvals could need to be re-set immediately when the function transfers to the Secretary of Education, causing uncertainty and instability in ITE provision. 	<ul style="list-style-type: none"> Introduce a grandparenting clause so all current standards and approvals apply until new ones are issued.
Stakeholder support impacts effectiveness	
<ul style="list-style-type: none"> Lack of sector support diminishes impact and achievement of outcomes. Evidence shows change is most successful when parties buy-in to the change process.¹ 	[redacted]
Loss of capability and capacity and sector input	
<ul style="list-style-type: none"> Ministry will need to build appropriate experience and expertise to deliver these functions. Unique and sector-specific voices in the ITE system could be reduced, such as ECE and schooling-specific groups, Kaupapa Māori, and rural schools. 	<ul style="list-style-type: none"> Involve sector in developing ITE standards (public consultation requirement proposed). Draw on the Council's knowledge and expertise (retaining Council advisory role proposed).

¹ An implementation framework for effective change in schools (OECD) 2020
 Security Level: Budget Sensitive
 METIS No. 1336238

Speed of change undermining ability to evaluate impact

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| <ul style="list-style-type: none">• Significant ITE changes in 2019 haven't been fully evaluated and are only just starting to produce new graduates.• In addition, ITE providers feel they and the Teaching Council are already making changes in ITE to directly respond to the Government's priorities, which aren't being recognised or given time to take effect.• The proposal risks significant system disruption without fully understanding the impact of existing work and changes underway. | <ul style="list-style-type: none">• Take time to understand impacts and evaluations before making changes to ITE standards once the Ministry takes on the new function and work with the sector in developing any proposed changes.• Note: this mitigation would not align with an ambitious reform of standards and approvals processes. |
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Financial Implications of 'lift and shift' proposal

19. 9(2)(f)(iv)

20. 9(2)(f)(iv)

Next Steps

21. If you decide to proceed with the 'lift and shift' proposal, this will form Tranche 3 of ETAB 2 Cabinet policy decision. ETAB 2 has Category 6 on the 2024 legislative programme which means that drafting instructions are to be issued before the end of 2024 to enable enactment by the end of 2025.
22. Annex Three sets out the timeline if you decide to proceed with the 'lift and shift'. We intend to take the paper to the Social Outcomes Committee (SOU) on 13 November, and Cabinet on 18 November. This is to give PCO sufficient drafting time balanced against a number of other end of year priorities.
23. Agency and Ministerial consultation is proposed to run from 16-26 October. To meet these timeframes we are seeking a decision from you by 4 October.
24. 9(2)(f)(iv)

Recommended Actions

The Ministry of Education recommends you:

a. **note** the stakeholders consulted at Annex 1 and key issues raised at Annex 2.

Noted

b. **note** that engagement was mostly from stakeholders directly involved in ITE delivery; that principals and teacher groups were underrepresented in feedback; and students, parents and whānau were not directly consulted due to the short and targeted process.

Noted

feedback may have looked different if ITE graduates had been consulted
 c. **note** that some stakeholders put forward alternative proposals to meet your objectives, which have been incorporated into option 3 – considering a broader package of reform.

Noted

d. **indicate** on the table above which pathway you agree to progress.

9(2)(g)(i)

Agree / Disagree

e. if you agree to either option 1 or 2, **agree** to include a grandparenting clause to mitigate potential sector disruption at the point the functions are removed from the Teaching Council.

Agree / Disagree

f. If you agree to option 2, **indicate** on the table the proposed amendments you agree to.

~~Agree / Disagree~~

g. **note** that if you agree to option 3, 9(2)(f)(iv)

Noted

Proactive Release:

h. **agree** that the Ministry of Education release this paper **with any necessary redactions** once final decisions have been made.

Agree / Disagree

I need better definition of the problem we are facing with ITE. Variation of courses, quality + confidence of graduates, logic of curriculum understanding etc → see ERD report. Please provide an improved paper with key milestones towards our possible end state, as discussed with Anay

Joshua Thurston
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 Te Pou Kaupapahere | Policy

Hon Erica Stanford
 Minister of Education

[Signature]

2/10/24

27/09/2024


Annex One: Overview of who we consulted

From 30 August - 20 of September 2024 the Ministry engaged in targeted consultation. An invitation to participate in an online meeting and provide written feedback was extended to 14 groups who have a direct link to ITE. A further 15 groups that are involved in education more broadly were invited to give written feedback only. This was due to time constraints. We held 11 meetings and received 19 written responses.²

We do not consider that a lack of response to the invitation to consult indicates either concern or support. In order to meet ETAB2 timeframes, it is not possible to go out for further consultation with groups who did not engage. If you progress with the 'lift and shift' proposal, stakeholders will be able to make submissions through a Select Committee process, if they wish to.

Groups involved in targeted consultation

9(2)(ba)(i)



² Some individual organisations provided separate written submissions despite not being individually contacted; primarily where they are members of a representative sector organisation.

9(2)(ba)(i)



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Annex Two: Summary of what we heard from consultation

This summary is to provide direct feedback on what we heard from stakeholders in verbal and written consultation sessions. We are providing this information as part of a robust legislative process to inform your decision making.

The information is presented in themes, but directly quotes submissions where applicable. Full written submissions can be provided to your office, if requested. You were also directly sent an open letter and statement from NZEI, PPTA, NZPF, and Te Akatea.

Themes

Mixed views on evidence and disagreement with the case for change

Many groups questioned the validity of the problem definition. They expressed that there is a lack of evidence supporting the problem and did not believe a case was made for the proposal. A smaller number of groups had a more balanced view and agreed that ITE outcomes needed to be improved, including responses from the early learning sector. The misalignment between the skills and knowledge expected of new graduates and what is being delivered in ITE programmes currently was noted. However, even in these submissions, there wasn't clear support for this proposal being the right solution to address these problems.

Quotes on lack of evidence supporting the problem

- *"The proposal provides no rationale or empirical evidence that demonstrate a need to transfer these functions from the Teaching Council to the Secretary of Education. In our view, the proper role of the Ministry of Education is teacher workforce strategy (supply and retention)." 9(2)(ba)(i)*
- *"In consultation with officials reference was made to ERO New Teachers and NZIER reports, these reports have no evidence to show that ITE is 'failing' or that shifting ITE regulatory functions from the Teaching Council to Secretary of Education is needed or justified." 9(2)(ba)(i)*

Quotes on impact of transferring functions to the Ministry

- *"We have not seen any evidence that the Ministry of Education has the capability or capacity to take on the ITE functions of the Teaching Council"-9(2)*
- *"The proposal provides no empirical evidence that transferring ITE functions from the Teaching Council to the Secretary of Education is necessary, or that it would improve outcomes in education"- 9(2)(ba)(i)*

Quotes on acknowledgement that ITE outcomes need improvement

- *We believe that the Teaching Council has been ineffective in ensuring consistent delivery of qualifications and provision of ITE that meets the quality we require and desire for our ECE teachers and early learning services - 9(2)(ba)(i)*
- *Variability in teacher confidence and knowledge indicates that ITE providers are not equipping many teachers with the knowledge and skills needed for quality teaching. – 9(2)*

Politicisation of ITE and consequences of losing independence

Many groups were concerned about the potential politicisation of ITE and the consequences of losing independence from government. Some groups acknowledged that professional self-regulation must be balanced alongside the role of the democratically elected government to shape the education system on behalf of the public. However, the current arm's length relationship between the regulator and the government was not seen to be problematic and it creates some important protections that could be lost.

Groups were concerned that ITE would become substituent to political cycles and will change based on the whims of different governments and ministers. Stakeholders raised that this was out of step with other professions e.g. nurses, police, midwifery and could set a precedent of greater governmental control over higher learning with significant impacts for other sectors. Specific issues raised included:

- Fear of a loss of academic authority and voice especially for universities who have 'critic and conscience of society' built into their foundation under the Education and Training Act 2020.
- Fear of programmes not being approved because of previous criticism of the government or because programme content goes against an ideological view of a minister.
- ITE providers become reluctant to be innovative with research and experience in ITE.

Quotes on politicisation of ITE

- *'[the proposal] will put ITE at risk of becoming a political football'* – 9(2)(ba) .
- *'Flip flopping standards and accreditation processes as governments change'* – 9(2)(ba)(i) .

Loss of Engagement/sector voice

The risk of a loss of high levels of sector engagement was raised by many groups in consultation. It was noted that the Teaching Council currently undergoes a large amount of sector consultation when developing its policies. This is built into the Council's incentives due to it being funded by members and partially governed by teachers. Stakeholders noted the same level of sector engagement will not be required by the Ministry. It was suggested that engagement with the sector be included as a legislated requirement to ensure this sector expertise was not lost and to help with sector buy-in.

Continued engagement with the Teaching Council was also noted as critical given the Teaching Council is still the regulatory body for the teaching profession but its work could be at odds with what is happening in the Ministry of Education.

Many groups felt that the sector or population group they represented (rural, ECE, Māori) could be left out and requested to be involved in the development of the new standards or any advisory group or function going forward.

Quotes on engagement

- *"Potential risks of this move taking place is that the professional body that represents the teaching profession can no longer share their expertise and use this to guide education"*- 9(2)(ba)(i)
- *"It is unlikely the sector will be confident MoE will be accountable to the sector in the same way"* - 9(2)(ba)(i)

Loss of 'teaching as a profession' and impact on its status and future supply

Some groups raised the view that this proposal risks diminishing teaching as a profession and therefore will lower the status of teaching and its attractiveness as a career. This is based on the idea that an important part of being a profession is setting your own entry standards and being self-regulating and that this change will set teaching apart from other professions.

Stakeholders noted that teachers could be put off by changes that reinforce a narrative that they aren't good enough, raising entry standards was also mentioned in this regard. These policies in combination with other more directive policies by government could discourage top candidates from even considering teaching as a career.

Quotes on loss of teaching as a profession:

- *"There are grounds for concern that removing or marginalising this role (by removing any 'limits' on the Government's 'levers') effectively de-professionalises teaching and takes away the mana and independence of teachers. - 9(2)(ba)(i)*
- *"Teaching is a 'self-regulating' profession as it fits all the criteria: has specialised knowledge, standards of entry/continuing practice, a code of ethics/conduct, a service orientation, and powers to discipline and sanction members. The Teaching Council presently fulfils all of these functions. - 9(2)(ba)(i)*

Implementation concerns – operational impacts if the proposal goes ahead.

There were a number of implementation concerns that were raised in consultation. Many of these would need further consideration if the proposal was to go ahead. Key issues raised include:

- Increased bureaucracy due to extra layers of approvals as ITE providers will still need to engage with the Council (for ensuring graduates will be able to meet the Teaching Standards), plus the Ministry, plus CUAP/NZQA. This also has cost implications for providers.
- Relationship between CUAP and NZQA and Teaching Council and how the Ministry will navigate this and ensure administrative burden is kept to a minimum.
- Ministry capacity and capability to perform the function and loss of relationships that the Council holds.
- Speed and pace of change – ITE providers need time to consider best ways to approach change and haven't been given a chance to show how they can respond to the Minister's priorities under current system settings.
- Worry about what the Minister wants to do with ITE standards if what the Teaching Council is already doing isn't going far enough, noting the Council is out for consultation on changes now that align with the Minister's priorities, particularly if changes will:
 - Reduce flexibility for ITE providers.
 - Restrict the variability of the type of ITE programmes out there which serve important purposes and meet different population and sector needs.
 - Create significant cost implications of changing ITE standards and reapproval processes for ITE providers.
- Cost implications for Government for a previously fee funded function.

- The long-term nature of the proposal and the time it will take for its effects to be felt in the profession (noting that ITE graduates each year make up a small proportion of the teaching workforce).

Quotes on operational implications

- *This change will create unnecessary additional administration and bureaucracy. It will be difficult for ITE providers to engage, understand and manage requirements for 3 agencies (TCANZ, CUAP, and now MoE) - 9(2)(ba)(i)*
- *The Ministry of Education is a large, Wellington-centric, government department that would slow down ITE approvals and improvements. There is a worry that ITE would get lost in the 'machine' that is the Ministry of Education, that trust and relationships would be lost, and approval and review timeframes would be long, costly and wasteful. - 9(2)(ba)(i)*
- *We note the long-term nature of this change proposal, and that the intention does not appear to be a "quick fix" but a repositioning of responsibility for future benefit. If the Ministry decides to change or establish new standards after legislative changes come into effect (2026), it is likely to be at least 3-4 years before any updated or new standards are fully implemented into ITE qualifications and programmes. This means that new teachers, trained to any new or updated standards, may begin to enter the profession from 2030 or later. - 9(2)*

Te Tiriti implications

Some groups noted that Māori need to be involved in the process of developing any new ITE approvals and standards framework to ensure Te Tiriti obligations are met.

Quotes on Te Tiriti

- *Te Tiriti and its principles (however defined) must be promoted as a platform upon which any proposed changes to our educational system are based. This includes the administrative and regulatory emendations proposed within the consultation document. - 9(2)(ba)(i)*
- *There are also implications for the Crown's Te Tiriti obligations to kaiako Māori if there is a decision taken without adequate consultation and a new agency and framework for ITE established without their input or a commitment to Te Tiriti o Waitangi. - 9(2)*

Alternative options

Some groups presented a range of alternative options for your consideration. These proposals inform broader regulatory reform work, if you choose to progress option 3.

Directly related to ITE regulatory system changes

- *Creating an advisory function for the Secretary of Education in Initial Teacher Education standard setting, approval and review. This would maintain the Teaching Council's statutory independence, while strengthening the Secretary of Education's influence over standards setting and professional regulation - 9(2)(ba)(i)*

- *Reword the Education and Training Act to strengthen the Minister's ability to instruct the Council to make changes to accreditation to meet government objectives. e.g change in the wording in section 482 of the E&T Act 2020 from "must have regard to" to "must give effect to", or "must observe". This would bind the TC to the Minister's instructions. - Universities New Zealand, (similar sentiments expressed by: 9(2)(ba)(i) ty*
- *Delay a decision about this proposal to consider and avoid unintended consequences. Engage with ITE providers about the 'problem' that needs to be addressed and gather evidence for whether this proposal is actually needed. - 9(2)(ba)(i)*
- *The accreditation of ITE programmes and the review of them could be removed from the Teaching Council and shifted to NZQA as the accrediting body for all programmes. -9(2)(b)*

Existing ITE system levers that could improve quality

- *Consider incentivising 'quality' ITE provision and explore what constitutes quality ITE and holding 'quality' providers up as an example, and prioritising funding for these providers – 9(2)*
- *NAMSA are invested in the ITE process and ensuring high quality practicum. You could expand the Normal/Model school system to have more schools committed to hosting practicum – 9(2)(ba)(i)*
- *The need to revise and strengthen the Standards to place a stronger emphasis on evidence-based approaches to learning and prioritise impacts, alignment with curriculum and more strongly outcome and impact focused - 9(2)*

Broader policies to support quality teaching outcomes

- *Development of a comprehensive Education Workforce Strategy in collaboration with the teaching profession and relevant experts (in demographics, ITE, PLD, economics of education etc). The Strategy should be evidence-based and outcomes-focused. This would both contextualise and inform processes of standards setting. - 9(2)(ba)(i)*
- *Funding for targeted PLD for mentors and release time for observation, feedback and reflection for both trainee and their mentors, noting this must include ECE funding (where currently the service covers the cost of the mentor's time and of the replacement teacher) – 9(2)(ba)(i)*
- *Enhance the role of the Teaching Council so it can be focused on better supporting teaching Professional Opportunity and Growth. The creation of a new function of the Teaching Council which ensures that Teachers are encouraged to maintain currency, keeping abreast of education trends and developments – 9(2)(ba)(i)*

Annex Three: Timeline if you proceed with 'lift and shift'

