



Education Report: Addendum to report *Proposed Amendments to Communities of Online Learning*

To:	Chris Hipkins		
Date:	12 April 2018	Priority:	High
Security Level:	In Confidence	METIS No:	1103827B
Drafter:	Ben O' Meara	DDI:	[REDACTED]
Key contact and number:	Iona Holsted, [REDACTED]	Round robin:	No
Messaging seen by Communications team:	No		[REDACTED]

Purpose of Report

The purpose of this paper is for you to:

Note the feedback provided by Te Kura on the Ministry's report *Proposed Amendments to Communities of Online Learning*.

Agree to proactively release this addendum to that report.

Recommended Actions

The Ministry of Education recommends you:

- a. **note** that Te Kura has provided feedback on the Ministry's report *Proposed Amendments to Communities of Online Learning*. We do not consider the feedback provided materially affects the recommendations made in that report, or your subsequent decision-making.

Noted

- b. **Proactively release** this addendum report. Unless you indicate otherwise, we will publish this report as soon as possible after you have had an opportunity to consider it.

Release / Don't Release



Iona Holsted
Secretary for Education

12 April 2018




Hon Chris Hipkins
Minister of Education

18/4/18

Background

1. On 21 February 2018 the Ministry provided you with an Education Report proposing amendments to Communities of Online Learning (COOL).
2. Following the proactive release of this report, Te Aho o Te Kura Pounamu (Te Kura) raised concerns with the Ministry that it was not consulted in the development of the report, and that consequently, the report does not accurately reflect the views of Te Kura, and omits some information that Te Kura considers should be brought to your attention.
3. On 5 April 2018 I met with the Board Chair of Te Kura, Dame Karen Sewell, to discuss her concerns. As agreed at that meeting, she then wrote to me setting out those concerns in detail. Her letter to me is attached in full for your consideration (**Appendix 1**)
4. While we do not consider that the points of concern raised by Te Kura materially affect the recommendations in our report to you or your subsequent decision-making, in the interests of transparency we are briefing you on the issues raised Te Kura.

Concerns raised by Te Kura

5. The headings below describe the key concerns raised by Te Kura about our report to you, with full details of these provided in their letter at **Appendix 1**. We have provided a brief Ministry comment on each point of concern.

A lack of consultation with Te Kura about the Report

6. The Ministry should have provided Te Kura with an opportunity to consider and provide feedback on the statements about the school that were included in our report to you. We have advised Te Kura that this was an omission in our process, and that we are committed to ensuring they are consulted when we develop advice that substantively relates to or comments on the school.

A failure to clearly distinguish Te Kura's model of distance education delivery from online learning

7. This concern is noted. As we identified in our report, the increasingly regionalised model of distance education offered by Te Kura does differ from online only education, and is a way in which Te Kura has made its distance education model more successful:

In order to address the increasing number of at risk students on its roll, Te Kura has been regionalizing its education model over a number of years. It now provides significant face-to-face time for students, through its Learning Advisories based in the regions. Effectively, Te Kura is providing what can be compared to Alternative Education [para 21].

A reliance on outdated evidence to support the conclusion that distance education is not suitable for at-risk students, while omitting more recent evidence that suggests that in many cases it can be.

8. While our report did not reference more recent information about Te Kura's provision, including the improvements outlined in the 2015 ERO review, we do consider that there are legitimate grounds for general concern about the suitability of full-time online learning options for at risk students. This was the primary intent of the advice provided in para 20 of our report, notwithstanding our specific reference to Te Kura:

One of the concerns raised by submitters on the Education Update was that schools would use COOL to remove at-risk and disengaged students from their environment. There is a legitimate

One of the concerns raised by submitters on the Education Update was that schools would use COOL to remove at-risk and disengaged students from their environment. There is a legitimate concern that online learning is not suitable for all students, and that online education settings may not be able to provide the level of academic and pastoral support that some students need. A 2012 review of Te Kura, and ERO reviews, have found that distance education is not suitable for the schools most at risk and vulnerable students. The Cognition research¹ indicates wide variability in the degree of pastoral care provided to students.

Statements in the Report that Te Kura is a proponent of becoming a 'school of choice'

9. We accept that our report's characterisation of Te Kura's approach to choice was outdated. As stated in their letter, *Te Kura is a proponent of broadening access to allow students to make an informed choice.*

A lack of acknowledgement that the Ministry already uses the referrals process in its Te Aho o Te Kura Pounamu Enrolment and Dual Registration Policy to 'off-ramp' thousands of at-risk students into distance education every year

10. As set out in the extract from paragraph 20 of the report quoted above, submitters to the Select Committee on the Education Act Update Bill were concerned that COOL would provide additional opportunities for schools to refer at-risk and disengaged students to distance learning, rather than supporting them to stay in a full time face-to-face schooling environment. We accept that our report should have noted that many students who are disengaged from face to face schooling are already being referred by the Ministry to Te Kura.

A lack of clarity about what "returning Te Kura to its previous role in the system" means.

11. We acknowledge that our report did not provide a clear description of Te Kura's role in the event that the COOL provisions are removed. Our statement was intended to convey that with the proposed removal of COOL provisions, Te Kura would not be established as a COOL and would instead retain the role it is currently playing in the system.
12. Our description of Te Kura's role, which referred to students who could not access face to face tuition or who were accessing supplementary tuition, did not encompass the multiple enrolment gateways for Te Kura.

Te Kura is not acknowledged as a key collaborator within the system that welcomes competition in the distance education space.

13. We acknowledge that this was not expressed in our report.

The statement on the low rates of achievement of dual registered students.

14. As Te Kura has pointed out, many dual enrolled students *have no intention or need to complete a full course of study, and there is no single measure for what constitutes a completion of a course for [their] dual students.*
15. We agree that the statement in our report about course completion rates did not adequately convey the complexities of measuring outcomes for dual-enrolled students.

¹ "On-line Distance Education" Cognition Education 2018. Note that this reference is to material from the literature review that formed part of that work.

Next steps

16. With your agreement, we will publish this addendum alongside the original report on the Ministry's website. As this release would include the appended letter from Te Kura, we will confirm that they are happy for that letter to be published.

6 April 2018

Call free 0800 65 99 88
www.tekura.school.nz

Iona Holsted
Secretary for Education
Ministry of Education
PO Box 1666
WELLINGTON

Email: [REDACTED] s 9(2)(a) OIA

Tena koe e te rangatira Iona,

Thank you for meeting me at such short notice yesterday. At the end of our meeting I said that I would provide you in writing with the specific details of the Board's concerns about the 'Education Report: Proposed amendments to Communities of Online Learning' and you said that you would take the Report off the website.

The Board is concerned that the Report contains errors of fact and omission, as well as opinions for which the evidence is unclear, absent or out-of-date. It does not reflect the significant recent advances made by Te Kura in using online learning to enable the effective delivery of personalised, authentic learning programmes. We believe the Report provides a misleading and negative characterisation of Te Kura and distance education in general.

This letter is not our response to the Minister's decision to repeal the legislation setting up Communities of Online Learning, on which we will make a submission.

Our key concerns with the Report are:

1. A lack of consultation with Te Kura about the Report.
2. A failure to clearly distinguish Te Kura's model of distance education delivery from online learning.
3. A reliance on outdated evidence to support the conclusion that distance education is not suitable for at-risk students, while omitting more recent evidence that suggests that in many cases it can be.
4. Statements in the Report that Te Kura is a proponent of becoming a 'school of choice'.
5. A lack of acknowledgement that the Ministry already uses the referrals process in its Te Aho o Te Kura Pounamu Enrolment and Dual Registration Policy to 'off-ramp' thousands of at-risk students into distance education every year.

6. A lack of clarity about what “returning Te Kura to its previous role in the system” means.
7. Te Kura is not acknowledged as a key collaborator within the system that welcomes competition in the distance education space.
8. The statement on the achievement of dual registered students.

1. Lack of consultation with Te Kura about the Report

We have concerns with the process and the lack of consultation in the writing of the Report, as well as findings in the Report itself.

We became aware of the Report through a media alert on the Minister’s announcement of Wednesday 28 March, which linked to this Report. The Ministry has not sought to meet with the Te Kura Board, *Para 30*.

You provide no evidence to support the statement that, as a School Board of Trustees “Te Kura is therefore unlikely to support a return to an environment where enrolment with it is restricted.” As the Board of a Crown entity, we are committed to implementing any decision made by Government, *Para 29*.

2. A failure to clearly distinguish Te Kura’s model of distance education delivery from ‘online learning’

The Report consistently refers to ‘online learning’. However online learning is just a medium - it does not describe an educational or pedagogical approach.

Te Kura is a distance education provider that provides personalised programmes of learning with a blended approach, which includes online provision.

Te Kura’s learning programmes involve close relationships between teachers and learners, collaborative learning and learning within communities.

We collaborate across the system, we partner with schools to provide staffing and dual tuition, including students in Alternative Education and Activity Centres. We collaborate with Virtual Learning Networks. We support students who are unable to enrol at a face-to-face school and support many students who have been disengaged from education.

3. A reliance on outdated evidence to support the conclusion that distance education is not suitable for at-risk students, while omitting more recent evidence that suggests that in many cases it can be

The Report presents outdated evidence and omits evidence where Te Kura’s delivery model has achieved good results. The Report relies on a 2012 Ministry of Education Report and a 2013 ERO Report on Te Kura as supporting evidence for the conclusion that distance education is not suitable for at-risk students. Since these reports Te Kura has made significant changes in responding to the needs of these students. However, there is no reference to the 2015 ERO Report on Te Kura, the

recent ERO Reports evaluating Te Kura's Big Picture Pilots, or analysis undertaken by the Ministry that shows the improvements that have been made by Te Kura, *Para 20*.

4. Statements in the Report that Te Kura is a proponent of becoming a 'school of choice'

The statements made in the Report that "Te Kura has been a proponent of becoming a school of choice for any student" and that "Te Kura has been a proponent of it becoming a school of choice for any student within the system who wishes to study through the online medium" are incorrect, *Para 29*.

Te Kura is a proponent of broadening access to allow students to make an informed choice that they would benefit from Te Kura's personalised and authentic programmes of learning.

Currently, it often takes some time before students who have left or been excluded from traditional schools are able to enrol at Te Kura, and as a result many have suffered gaps in their education.

5. A lack of acknowledgement that the Ministry already uses the referrals process to 'off-ramp' thousands of at-risk students into distance education every year

The Ministry of Education already uses the enrolment policy to refer at-risk students to Te Kura. In 2017, approximately 60 percent of Te Kura's 3,290 full time enrolments were students who were considered by the Ministry to be at-risk and referred to Te Kura. This is not stated anywhere in the Report. We believe this is misleading given the stated concerns that schools would use COOL to off-ramp at risk students, *Para 3*.

Recent ERO evaluations have found that these students make significant progress and achieve in a distance learning environment, where the appropriate supports are in place.

6. A lack of clarity about what "returning Te Kura to its previous role in the system" means

There is a lack of clarity on what the Report is proposing for Te Kura in the recommendation that Te Kura return to its "previous role in the system – a school that enrolls students who cannot access a face-to-face school and provides supplementary tuition for students enrolled in a school for various reasons", *11c and c iii*.

It recommends removing Te Kura as a 'school of choice' for any student in the system. This ignores the 16 to 19-year-old and adult learners who can currently choose to enrol at Te Kura. In 2017, we had 4,826 young-adult and 2,456 adult enrolments.

Neither does the Report cover Te Kura Summer School. This has been running successfully for three-years, in close contact with the schools that the students were enrolled with previously.

7. Te Kura is not acknowledged as a key collaborator within the system that welcomes competition in the distance education space

On the statement that "teachers and students be able to choose an online learning option provided within the state system that best meets their needs, rather than choosing Te Kura because it is a 'free' resource to the school.", *Para 9*. Te Kura is a part of the state education system. We always have been.

Te Kura has absolutely no concerns about other providers entering the distance education space and believes that online learning enables even greater collaboration. In 2017, Te Kura delivered teaching to 1,800 students from 197 schools that were part of a Virtual Learning Network.

The statement that increased competition would drive down the size of Te Kura, increase its agility and responsiveness, presents our size as a negative and lacks evidence, *Background 3c*. We would counter that size creates the economies of scale that enable wide offerings. An example of this is in Te Kura's provision of dual tuition when schools are unable to offer a subject or have a small senior class size. In 2017, Te Kura provided dual tuition to 9,843 students from 725 providers.

We have gone through extensive transformations in our long history, including the recent improvements enabled by developments in technology to enable online provision. We will continue to anticipate and respond to the needs of the education sector.

8. Statement on the achievement of dual registered students

The Report makes the statement that a high proportion of students who enrol to do supplementary dual tuition do not complete the course and links this to the entire budget for supplementary tuition. This is misleading, *Para 17, Footnote 7*.

There is no single measure for what constitutes a completion of a course for our dual students, and there are many variables. Some dual students who enrol with us are not yet at NCEA level, so not measured by external results. Many dual students are in Alternative Education and Activity Centres and Teen Parent Units. Te Kura also supports schools who have emergency staffing vacancies. Another significant variable is the support the student receives for their dual tuition from the school or centre in which they are enrolled. Many of these students have no intention or need to complete a full course of study. Despite this, 64 percent of the 2017 dual students with Te Kura in NCEA subjects that stayed on the roll for half a year or more achieved NCEA results.

Again, thank you for your time and your consideration of our concerns.

Ngā mihi nui,



Karen Sewell
Board Chair
Te Aho o Te Kura Pounamu