



NEW ZEALAND COUNCIL OF TRADE UNIONS  
*Te Kauae Kaimahi*

**Submission of the  
New Zealand Council of Trade Unions  
Te Kauae Kaimahi**

to the

**Tertiary Education Commission**

On the

**Literacy and Numeracy Implementation Strategy  
Refresh**

**P O Box 6645**

**Wellington**

**27 February 2015**

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## **1. Introduction**

- 1.1. This submission is made on behalf of the 36 unions affiliated to the New Zealand Council of Trade Unions Te Kauae Kaimahi (CTU). With 325,000 members, the CTU is one of the largest democratic organisations in New Zealand.
- 1.2. The CTU acknowledges Te Tiriti o Waitangi as the founding document of Aotearoa New Zealand and formally acknowledges this through Te Rūnanga o Ngā Kaimahi Māori o Aotearoa (Te Rūnanga) the Māori arm of Te Kauae Kaimahi (CTU) which represents approximately 60,000 Māori workers.
- 1.3. Thank you for the opportunity to submit on the Literacy and Numeracy Implementation Strategy Refresh. We agree that is time this review occurred, and affirm the importance of literacy and numeracy for both social and economic reasons.
- 1.4. The high incidence of inadequate adult literacy and numeracy in New Zealand mean that these matters deserve high priority, close attention and new resources.
- 1.5. Tertiary education is of critical importance to the CTU. The CTU vision is for a highly skilled workforce and workplaces that are committed to building a high-value and high-wage economy. Access to tertiary education and training is critical to achieving this vision. Literacy and numeracy is an essential prerequisite for this.
- 1.6. A strong tertiary education system with good access for all New Zealanders is fundamental to realising the goals of increased productivity and higher skills levels in the New Zealand workforce and in the economy.
- 1.7. Tertiary education not only impacts on our productivity and skills levels but also has a beneficial impact on our society overall. Tertiary education enables the quality of people's lives to be improved, increases equity and builds a strong society and democracy.

- 1.8. For some CTU unions, tertiary education is the primary focus of work, and our submission in part reflects the fact that the condition and development of the tertiary education workforce is important to consider in providing an effective and sustainable education and training system.
- 1.9. We support the submission from our affiliate, the Public Service Association.
- 1.10. Responses to your questions follow. Our greatest single focus is on the workplace, for which we see the resumption of funding of the Learning Representatives programme as an important element, but we also comment on most of the other areas the consultation covers.
- 1.11. For questions arising from this submission, please contact:

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## Feedback form for first section of Consultation Paper (pages 3-7)

Feedback question	Our feedback
<b>Context and operating environment</b>	
<p>Is there anything else the TEC should think about in terms of the operating environment for adult literacy and numeracy?</p>	<p>There is a strong focus on what systems can do for adults with literacy and numeracy needs, and little about giving those adults more control over what is done “for” or “to” them. This is particularly relevant in the workplace, which needs to have an important part in the strategy because of the established needs of a large proportion of our existing workforce.</p> <p>Consideration should be given to the impacts of other policies on the effectiveness of literacy and numeracy provision. For example the emphasis given to Levels 4 and above, discouraging provision at lower levels, may mean people whose literacy and numeracy would benefit from taking courses and programmes at lower levels are unable to take that step. For many adults, their entry has been through informal and low level tertiary provision, as evidence from the Adult Literacy and Language Survey (ALLS) demonstrated (Competitive Education Research Unit, 2009). The severe cut in funding to Adult and Community Education, while still available for some literacy and numeracy programmes, removed the option of embedded literacy and numeracy in courses that would attract the interest of adults for those who could not afford the cost. Further, priority being given to younger people may disadvantage older learners in accessing programmes that they need.</p>
<p>Do you agree with the feedback received about the high-level operating environment over the past few years (paragraphs 22-26)? Why, or why not?</p>	<p>We agree there has been significant progress in embedding literacy and numeracy in courses provided by TEOs though note that making it “business as usual” (we hope the use of that term does not detract from the importance of these matters) has come at a time of increasing financial stringency and so has increased general financial and resource pressures on tertiary institutions.</p>
<b>Scope of Strategy</b>	
<p>Do you agree with the proposed scope? Why, or why not?</p>	<p>We support maintaining the scope of the strategy and keeping its focus on adult literacy and numeracy. We also agree that work should continue on exploring how other relevant literacies could be included, particularly when they can be used as a tool to strengthen literacy and numeracy provision.</p>

<p>Do you have suggestions for improving the proposed scope? How would they improve it?</p>	<p>It is important to include language skills for English for speakers of other languages. With strong immigration and many of the new arrivals needing to improve their English language skills for their social and employment prospects in New Zealand, this issue is if anything more important than it was previously. For their success and for New Zealand's social cohesion, it is important that they are supported in their integration into New Zealand society. Language is a crucial part of that. Like literacy and numeracy more generally, it has both social and economic benefits.</p> <p>There is a specific problem in some sectors such as the aged care sector where workers with English as a second language have language, literacy and numeracy needs but don't have access to these programmes.</p>
<p>Do you have suggestions for possible success indicators in the refreshed Strategy?</p>	
<p><b>Framework and structure of Strategy</b></p>	
<p>Do you agree with this framework and structure?</p>	<p>The framework and structure seems generally appropriate. However we question how a successful and sustained workplace focus will be achieved with the withdrawal of funding from the learning representatives programme.</p> <p>We also consider that the framework needs to emphasise the role that the public tertiary education sector and not-for-profit TEOs play in this area of provision, working alongside employers and industry to support literacy and numeracy. It is within the tertiary education sector that expertise in both pedagogy and provision of literacy and numeracy resides.</p>
<p>Do you have suggestions for improving the proposed framework and structure? How would they improve it?</p>	

**Reference:**

Competitive Education Research Unit. (2009). *Adult Literacy and Language Survey (ALLS) Survey: Numeracy, Skills and Education in New Zealand and Australia.*

## Feedback form for Educational Resources workstream (pages 8-9)

Feedback question	Our feedback
<b>Learning Progressions</b>	
Do you agree with what was said? Why, or why not?	It is important to seek out the views of the learners with literacy and numeracy needs and ensure those needs are properly understood.
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	
<b>Assessment Tool</b>	
Do you agree with what was said? Why, or why not?	<p>We share concerns that the Assessment Tool is not well suited to some groups of learners such as those who are native speakers of other languages or have low computer skills or access. We also have concerns that it does not reflect all outcomes that might be regarded as success for those who enter literacy programmes. Some of those successful outcomes are social, confidence building or strengthening learning skills, and some are community rather than individual. Care should therefore be taken in the use of its results to ensure they are used only where it has validity in measuring literacy or numeracy improvements, and other ways found to measure progress where it does not have as high validity.</p> <p>We are particularly concerned about increasing the use of data from the Assessment Tool to inform funding decisions. As a tool for initial assessment, it has an important function. However there are often a myriad of other reasons outside of the control of the tutor that may impact on an individual's progress. To directly link funding to individual results is unfair and ultimately punishes the next cohort of learners, if funding is decreased as a result.</p>
What are the most important suggestions we should act on? Why?	Within the constraints above, it is valuable to make better use of the aggregated data from the Assessment Tool to assess the effectiveness of programmes and initiatives, and to understand the social and economic effects of low literacy and

	<p>numeracy levels and their improvement. However assessment data needs to be interpreted by someone who is well-informed about adult literacy (an educationalist) so they can report it in terms relevant to the audience.</p> <p>Where the tool is used in workplaces, we would like assurance that results of the assessments are used for educational purposes only and that individual privacy and confidentiality is maintained, to prevent employers using the tool as a performance management tool or a mechanism for constructive dismissal.</p>
<p>Are there other suggested actions we should think about?</p>	<p>Create a pilot programme to develop a parallel Assessment Tool targeting learners who are speakers of other languages and learners with low or no computer skills.</p>
<p><b>Pathways Awarua</b></p>	
<p>Do you agree with what was said? Why, or why not?</p>	
<p>What are the most important suggestions we should act on? Why?</p>	
<p>Are there other suggested actions we should think about?</p>	

## Feedback form for Learning Opportunities workstream (pages 10-12)

Feedback question	Our feedback
<b>Embedded literacy and numeracy (ELN)</b>	
Do you agree with what was said? Why, or why not?	
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	<p>While embedding is important, the TEC must ensure that funding is sufficient to enable additional teaching resources and staff preparation and teaching time. If the model is not fully-funded, it impacts on the priority given to other parts of a course or programme, and the availability of other elements of programmes. Raised expectations for this kind of provision must be supported with sufficient funding, especially in the current very financially constrained environment where providers are constantly being required to do more with less. Consequences of underfunding include reductions in other aspects of provision and increasing workload pressure on staff which is individually detrimental and impacts on the quality of provision for students.</p>
<b>Specific literacy and numeracy funds</b>	
Do you agree with what was said? Why, or why not?	<p>We note that the 2012 Adult Literacy and Numeracy Implementation Strategy included funding for the Learning Representatives programme under the <i>Learning opportunities for adult New Zealanders</i> workstream. Despite this, and despite very positive evaluations of the programme, its funding has been discontinued leading to the demise of the programme. We address this further below, but there is an important issue here regarding continuity of funding. Small, contestable funds frequently lead to uncertainty of medium and long term funding which means that initiatives have little time to prove their worth, a significant problem given the nature of education and training whose benefits are frequently long term. It also means that embedding new ways of doing things – such as creating a learning culture in a workplace – is challenging and takes time. Funding needs to recognise this and not be cut short well before it has had a chance of success. It also wastes the expertise</p>

	built up by staff engaged in teaching and administering these programmes, and makes it difficult to recruit and retain staff. It is a short-sighted approach to human development.
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	It is therefore important that at least some funding should have a reasonable degree of assurance of multi-year provision and renewal. Clear criteria for performance would help but they must recognise that many benefits are long term and indirect.
<b>Workplace focus</b>	
Do you agree with what was said? Why, or why not?	<p>This should be read alongside our comments under Workstream 3: Professional Development/Training in the workplace.</p> <p>We believe this is one of the most important aspects of the strategy because of the low literacy and numeracy levels in our workplaces, and the impact this has on workers' incomes, prospects and quality of life and work, as well as having a significant impact on New Zealand's economy and its potential.</p> <p>However we are concerned at control and funding increasingly being handed to employers for workplace programmes. The benefits of raising literacy and numeracy levels do not solely go to the employer, and not solely in terms of productivity, though this is certainly important. Workers need improved literacy and numeracy in all parts of their lives, not only work, and their learning needs are wider than what might suit their employers. More control needs to be in the hands of workers in determining and pursuing their learning needs. The Learning Representatives programme was designed with these factors in mind. It encouraged workers to consider their overall education and training development needs, including literacy and numeracy, and gave them access to information and advice on how to pursue these. It also provided trusted peer advice from elected co-workers in an area that can be very sensitive, particularly in the context of the employment relationship when workers may feel they compromise their job prospects by "admitting" to literacy or numeracy difficulties or other gaps in their learning. It assists in creating a learning culture in the workplace.</p>

	<p>In addition to the above issues, workplace learning cannot be considered separately from the nature of employment. For many workers, and this is more likely for people with literacy and numeracy needs, jobs are insecure and work is fragmented by the need to hold multiple jobs and frequent changes of job. New Zealand has among the shortest job tenures in the OECD (New Zealand Council of Trade Unions Te Kauae Kaimahi, 2013, pp. 12–13). Unless literacy and numeracy assistance is available in virtually all workplaces, with some consistency of approach and content (which seems unlikely, especially if it is provided by employers) such workers will get at best fragmented assistance which risks being so disjointed that it is near useless. At worst they will be discounted by the employer or themselves for access to workplace assistance because of the fragmented nature of their work. The risks are evidenced by the finding that in general, workers in temporary employment, and particularly those in casual jobs or who work through labour hire agencies, receive less training than other workers (e.g. Barnes &amp; Dixon, 2010; Dixon, 2011). Tying all provision for workplace literacy and numeracy needs to employer-provided provision therefore runs a high risk of missing some of those with the greatest needs.</p> <p>A particular but critical literacy and numeracy issue in the workplace is documentation relating to Health and Safety. This will become even more critical with the passage of new and significantly changed legislation later this year, the Health and Safety Reform Bill, along with new regulations, guidance, labelling requirements and other measures that will accompany it. Workplaces will have greater expectations placed on them to have their own processes, many of them documented in writing. Some of the documentation will be technical and require numeracy skills. It is hoped there will be a greater emphasis on worker participation in workplace health and safety, and this will require training. The ability to read, understand and act on these documents will be essential, and will provide both a need and an opportunity for improving literacy and numeracy in this context.</p>
<p>What are the most important suggestions we should act on? Why?</p>	<p>Expanding and improving quality of provision in workplaces for the reasons given above, and because, as the TEC commentary mentions, there is still a huge unmet need for raising workplace literacy and numeracy levels.</p>

<p>Are there other suggested actions we should think about?</p>	<p>Resume funding for the Learning Representatives programme for the reasons given above.</p> <p>A full evaluation of the funded employer literacy programmes. Significant funds have been allocated to these programmes yet quality and outcomes of them are unclear.</p> <p>In conjunction with other agencies (particularly WorkSafe New Zealand), prepare and provide funding and resources for literacy and numeracy needs resulting from the greater attention and priority being given to workplace health and safety, and provide for embedding of literacy and numeracy in related training programmes, including appropriate professional development for trainers where needed.</p> <p>Consider the implications of the low tenure of jobs in New Zealand, and the implications for workers in temporary and otherwise insecure work as to the providers and nature of workplace literacy and numeracy assistance.</p> <p>Include recognition that strong relationships between labour market and tertiary organisations must include formal recognition of the importance of the role of unions. Unions are part of industry and play a critical role in formulating and organising collectively to be able to represent and advocate for the needs for workers and their education and training needs. The TEC should actively engage with unions on these matters and encourage unions to apply for funding, on their own or jointly with TEOs or employers. Regional funds may be useful.</p>
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## References

- Barnes, M., & Dixon, S. (2010). *Employer-funded education and training – who receives it?*. Wellington, New Zealand: Department of Labour. Retrieved from <http://www.dol.govt.nz/publications/research/employer-funded-education-training/index.asp>
- Dixon, S. (2011). Temporary Employment and the Quality of Temporary Jobs. *New Zealand Journal of Employment Relations*, 36(1), 1–20.
- New Zealand Council of Trade Unions Te Kauae Kaimahi. (2013). *Under Pressure: A Detailed Report into Insecure Work in New Zealand*. Wellington, New Zealand: New Zealand Council of Trade Unions Te Kauae Kaimahi. Retrieved from <http://union.org.nz/underpressure>

## Feedback form for Professional Development workstream (pages 13-15)

Feedback question	Our feedback
<b>Improving tertiary workforce capability</b>	
<p>Do you agree with what was said? Why, or why not?</p>	<p>It is important to consider tertiary workforce issues, at a time of financial stringency and slow growth or even falls in student numbers. The point made (paragraph 43) about the high staff turnover in foundation level education is an important one and a symptom of a workforce under stress. This can undermine the best intentioned professional development programmes for tertiary staff. If either the staff or the institution has little confidence in their ongoing employment, then little priority will be placed on professional development. Even if it occurs, high turnover suggests a high rate of loss of knowledge and practical experience. As noted above, this is a wasteful approach to development of staff and of the capabilities of our educational and training institutions. It is vital that government strategies and policies recognise that there are staff development needs that cannot or will not be met by institutions and the staff themselves, and that staff are not simply inputs into a production process.</p> <p>We support the suggestions to</p> <ul style="list-style-type: none"> <li>• Investigate effective ways to increase the number of Māori and Pasifika educators in adult literacy and numeracy;</li> <li>• Investigate incentivising retention of trained adult literacy and numeracy workforce.</li> <li>• Increase the sharing of good practice and the development of connections throughout the sector.</li> </ul>
<p>What are the most important suggestions we should act on? Why?</p>	<p>Investigate ways to incentivise the retention of trained adult literacy and numeracy workforce.</p>
<p>Are there other suggested actions we should think about?</p>	<p>Structure funding to encourage and enable retention and development of staff.</p> <p>It is incumbent on the TEC, as the funder, to investigate the extent to which high staff turnover is related to employment conditions for literacy and numeracy staff. In the private tertiary education sector, our affiliates report much inferior employment conditions across the board. This contributes to high staff turnover, which as we note above, is wasteful and impacts on the success</p>

	<p>of literacy and numeracy provision. For-profit private tertiary providers too often have a focus on profit generation at the expense of conditions for staff which suffer as a result.</p>
<p><b>Training in the workplace</b></p>	
<p>Do you agree with what was said? Why, or why not?</p>	<p>We are concerned at the quality control risks that may be present if literacy and numeracy provision is handed to employers. Their interests may be narrow, and they may try to skim on the quality of provision with little accountability. Their employees may be reluctant to complain given the power relationships in employment. In practice they may teach workplace skills and very few literacy or numeracy skills, because that is what gives them the quickest return (and may have little long-term return to the employee if they are specific to that firm). Or their approach to literacy and numeracy skills may be very specific and short-term, doing little to address the worker's wider needs.</p> <p>We are concerned that the TEC cannot monitor, let alone assess, the quality of workplace delivery. While for TEOs, accreditation by NZQA gives a level of assurance of educational quality, even that does not exist for employers.</p> <p>Many employers will have little capacity in providing the programmes required and even large ones may have few staff for the purpose and therefore frequently have difficulty in maintaining knowledge of good practice, consistency of provision and the variety of provision that adult learners need. Because teaching and learning is their purpose, TEOs have (or certainly should have) the ability and capacity to support the professional development of their staff to teach literacy and numeracy effectively, with the broader needs of learners in mind.</p> <p>It is therefore essential for the quality of literacy and numeracy training in workplaces that its provision is from TEOs with the demonstrated capability and capacity to provide quality programmes, rather than providing funding to individual employers. This should be accompanied by funding and performance requirements designed to recognise the need to develop and maintain the capability and capacity of TEOs with literacy and numeracy experience, and the role of ITOs in ensuring good quality literacy and numeracy content in the courses and programmes they specify and fund.</p>

What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	Move away from employer-provided literacy and numeracy training in workplaces to provision by public TEIs and non-profit TEOs (where appropriate through ITOs) with the demonstrated capability and capacity to provide quality programmes, and whose priority is not profit generation for owners or shareholders. This should be accompanied by funding and performance requirements designed to recognise the need to develop and maintain the capability and capacity of TEOs with literacy and numeracy experience.
<b>Literacy and numeracy qualifications</b>	
Do you agree with what was said? Why, or why not?	<p>We support a requirement that teachers who design or teach courses including explicit or embedded literacy and numeracy content should hold an appropriate qualification, but careful consideration needs to be given to recognition of prior learning and the need for a variety of such qualifications to suit both the complexity and level of programme design and teaching, and the diversity of content and context.</p> <p>As we noted earlier, appropriate funding and resources must be provided to support these staff to upskill and advance their knowledge.</p>
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	Provide support including professional development that allows the attainment of Level 8 and above qualifications in Adult Literacy and Numeracy.

## Feedback form for Addressing specific learner needs workstream (p 16-17)

Feedback question	Our feedback
<b>Māori learners</b>	
What do you think of what was suggested?	We agree that a specific focus should be provided for Māori learners, with careful attention needed to ensure that provision reflects the cultural context that many Māori learners exist within.  Strategies do need to be firmly linked to other initiatives for Māori, and with iwi, hapū and Māori organisations' own social and educational development plans
What are the most important suggestions we should act on? Why?	Those outlined in the document, along with forging links and alliances with iwi, hapū and Māori organisations as appropriate.
Are there other things we should think about doing? We welcome your ideas and suggestions.	A recruitment and employment strategy for Māori literacy and numeracy staff is needed, and it should be given sufficient priority to ensure it is effective.
<b>Pasifika learners</b>	
What do you think of what was suggested?	We agree with the priorities identified for a specific Pacific strategy.
What are the most important suggestions we should act on? Why?	Those outlined in the document.
Are there other things we should think about doing? We welcome your ideas and suggestions.	A recruitment and employment strategy.
<b>Learners new to New Zealand</b>	
What do you think of what was suggested?	As already noted, given the increasing numbers of new New Zealanders settling here, it is timely to have a specific focus on language needs for this group.
What are the most important suggestions we should act on? Why?	
Are there other things we should think about doing? We welcome your ideas and suggestions.	We would expect that this focus would bring with it additional resources and funding, rather than drawing these from other areas.

<b>Adults with learning difficulties</b>	
What do you think of what was suggested?	<p>We welcome this, though note the diversity of this group, some requiring high levels of specialised help and support. It is important that the TEC has a thorough understanding of the needs of this group and is prepared to fund it sufficiently.</p> <p>This group and the other “specific learner needs” groups will often be the same people experiencing literacy and numeracy difficulties in the workplace, so consideration needs to be given as to how all the needs of a learner are supported in an integrated way.</p>
<p>Are there other things we should think about doing?</p> <p>We welcome your ideas and suggestions.</p>	

### **Feedback form for Cross-government collaboration workstream (p18-21)**

<b>Feedback question</b>	<b>Our feedback</b>
<b>Work together and better with other parts of government</b>	
Do you agree with what was said? Why, or why not?	We agree – it is vitally important that agencies work closely together and link their strategies wherever possible. A co-ordinated approach reduces duplication of services and hopefully also creates a smoother system for learners and literacy and numeracy staff.
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	
<b>Continue increasing research and evidence base</b>	
Do you agree with what was said? Why, or why not?	We strongly support strengthening research and evidence as to the effects of low literacy and numeracy levels on individuals, communities, firms and the economy. A good evidence base will ensure that we can confidently implement and support the right programmes.
What are the most important suggestions we should act on? Why?	

Are there other suggested actions we should think about?	
<b>Incorporating broader outcomes relating to adult literacy and numeracy</b>	
Do you agree with what was said? Why, or why not?	We agree that this is an important area for further work.
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	
<b>Improving the secondary-tertiary interface</b>	
Do you agree with what was said? Why, or why not?	
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	
<b>Promoting literacy and numeracy to citizens, communities, and employers</b>	
Do you agree with what was said? Why, or why not?	
What are the most important suggestions we should act on? Why?	
Are there other suggested actions we should think about?	

### **An opportunity for final overall comments**

If you were the TEC, what would be the three most important suggested actions you would carry	
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out in 2016? (They can include suggestions already in the Consultation Paper as well as your additional ones)	
Why have you chosen these three actions?	
Are there any other areas that we've missed or other comments that you would like to add?	
Do you have any overall feedback on the Consultation Paper, and/or the Strategy refresh process?	