



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

**Draft Literacy and Numeracy
Implementation Strategy, 2015-2019**

P O Box 6645

Wellington

15 July 2015

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 draft Literacy and Numeracy Implementation Strategy. We agree that it is time this review occurred, and affirm the importance of literacy and numeracy for both social and economic reasons.
- 1.4. We submitted on the earlier “refresh” (our ‘Refresh Submission’), but are disappointed that many of our suggestions have not been addressed. The proposed strategy does not appear to have resulted from an assessment of the outcomes of some of the programmes that it proposes to expand such as employer-led workplace literacy and numeracy training. It increases reliance on the Assessment Tool without recognising submissions that broader considerations are required to assess outcomes.
- 1.5. The high incidence of inadequate adult literacy and numeracy in New Zealand mean that these matters deserve high priority, close attention and new resources.
- 1.6. 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.
- 1.7. 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.

1.8. 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.

1.9. 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.

1.10. For questions arising from this submission, please contact:

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<p>Workstream 1: We will reach more people who need help by:</p> <ul style="list-style-type: none"> • increasing our focus on the workplace and • collaborating with other agencies 	
Feedback question	Your feedback
<p>Do you agree with the direction of this workstream?</p>	<p>We strongly agree that there needs to be an increased focus on the workplace. 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 as we stated in our Refresh Submission, workplace literacy and numeracy (and indeed workplace education and training) requires giving those adults more control over what is done “for” or “to” them. The direction of this Workstream is to put control and funding firmly in the hands of employers.</p> <p>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</p>

	<p>than what might suit their employers. More control needs to be in the hands of workers in determining and pursuing their learning needs.</p> <p>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. This has not been addressed.</p> <p>We also pointed out that workplace learning cannot be considered separately from the nature of employment. For many workers, and frequently for those with literacy and numeracy needs, jobs are insecure and work is fragmented by the need to hold multiple jobs and frequent changes of job. Unless literacy and numeracy assistance is available in virtually all workplaces, with some consistency of approach and content (which seems especially unlikely 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. We provided evidence for this in the lack of training for workers in temporary employment, and particularly those in casual jobs or who work through labour hire agencies. This has been further confirmed by Blumenfeld (2015) who analysed the 2008 and 2012 Surveys of Working Life and found workers are significantly less likely to get training if they were in insecure work including seasonal work and 90 day trials. 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>Do you agree with the actions in this workstream?</p>	<p>We are very concerned that workplace literacy and numeracy training is proposed to be entirely by employers. We raised concerns in our Refresh Submission at the quality control risks that may be present in this situation. Employer interests may be narrow, and they may try to skimp 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</p>

	<p>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 the skills 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 learning needs. In addition, 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 the development of good practice, consistency of provision and the variety of provision that adult learners need.</p> <p>We are concerned that the TEC cannot monitor, let alone assess, the quality of literacy and numeracy education in the workplace delivered in the way proposed. No evidence is provided in the draft Strategy that these concerns are being addressed.</p> <p>The number of employees targeted to receive programmes is entirely inadequate at 8,000 (we assume per year) by 2019. It is clearly driven by funding rather than need, given the estimate affirmed in the consultation document that "around 40 percent of people in the workforce have literacy and numeracy skills below the level needed to function well in a knowledge society and information economy". Only 35 employers will receive funding. Limiting funding for workplace literacy to employer capability and capacity severely limits the availability of such programmes to workers.</p> <p>The workstream also proposes "An increase in the proportion of industry trainees with no tertiary qualification enrolled in a level 2 qualification who complete a level 2 qualification". While this may have merits of its own, it is only weakly connected with the workplace as such.</p> <p>Success in this proposal also needs to consider the weak connection between low level vocational qualifications and improvements in pay (e.g. Crichton, 2009; Zuccollo, Maani, Kaye-Blake, & Zeng, 2013) which has been further reinforced by recent research by Tumen, Crichton and Dixon (2015) showing no returns in higher pay for achieving level 2 tertiary qualifications by poorly qualified school leavers. There is little incentive for workers to work towards these qualifications, especially if there is weak support from their employer. This is another case which illustrates that this strategy cannot be seen in isolation from other problems in the labour market.</p>
<p>What else would improve the Strategy in</p>	<p>Move away from employer-provided literacy and numeracy training in workplaces to provision by public</p>

<p>this workstream? Why?</p>	<p>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.</p> <p>Rather than expanding employer-led provision, give workers more control over their learning through the Learning Representatives programme, as we previously submitted.</p> <p>Assess effectiveness of employer-led training from both the worker's and the employer's viewpoint, and publish the results of the assessment.</p> <p>Employers who accept government funding or whose employees' training is government funded should be required to recognise the achievement of qualifications by pay increments for those employees in order to provide incentives and recognition for improving skills.</p>
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Workstream 2: We will better target support to individual learners to help improve their outcomes by:

- supporting more Māori and Pasifika learners to succeed
- supporting more younger learners to succeed
- supporting more adults who are new to New Zealand to succeed and
- supporting more adults with learning difficulties to succeed

Feedback question	Your feedback
<p>Do you agree with the direction of this workstream?</p> <p>Why or why not?</p>	<p>We support additional assistance being provided to these categories of learners.</p> <p>We also support tailoring the assessment tool to different needs, though are unable to assess the effectiveness of what is proposed. We note however that no tailoring is being proposed for Pacifica learners.</p> <p>We strongly support professional development for tutors and trainers working with these learners, as this is an essential aspect that needs ongoing attention.</p>
<p>Do you agree with the actions in this workstream?</p> <p>Why or why not?</p>	<p>Yes in general, but note our concerns above regarding encouraging the effectiveness of and incentives for completion of Level 2 qualifications without considering wider labour market issues including job prospects and recognition in pay levels.</p>

<p>What else would improve the Strategy in this workstream?</p> <p>Why?</p>	<p>As above regarding recognition of level 2 qualifications: Employers who accept government funding or whose employees' training is government funded should be required to recognise the achievement of qualifications by pay increments for those employees in order to provide incentives and recognition for improving skills.</p>
<p>Workstream 3: We will ensure that tutors and trainers are well equipped to help their learners succeed by:</p> <ul style="list-style-type: none"> • maintaining and promoting our educational resources and • ensuring an appropriately qualified workforce 	
Feedback question	Your feedback
<p>Do you agree with the direction of this workstream?</p> <p>Why or why not?</p>	<p>We strongly support the directions in this workstream to maintain and build on the educational resources for literacy and numeracy and to support the professional development of tutors and trainers.</p> <p>We welcome the recognition that there is a problem with significant churn in the foundation-level tutor/trainer workforce, though underlying reasons for this are not addressed.</p>
<p>Do you agree with the actions in this workstream?</p> <p>Why or why not?</p>	<p>While the Literacy and Numeracy Assessment Tool is a useful instrument, as we and other submitters to the "Refresh" consultation commented, its use must be embedded in wider considerations of learner success. This does not appear to be fully recognised in the directions and actions of this workstream.</p> <p>We support a well designed national publicity campaign to encourage people to improve their literacy and numeracy skills.</p> <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>We also support funding of professional development for educators.</p>
<p>What else would improve the Strategy in this workstream?</p>	<p>Broaden assessment criteria beyond the results of the Assessment Tool and ensure it is used only for appropriate purposes. As we wrote in our Refresh Submission, we</p>

Why?	<p>share concerns that the Assessment Tool is not well suited to some groups of learners including those who 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 outcomes. Care should therefore be taken in the use of the Tool's results to ensure they are used only where it has validity in measuring literacy or numeracy improvements, and other ways are found to measure progress where it does not have as high validity. These issues are particularly critical when assessment using the tool is used to gain access to funding. Where the tool is used in workplaces, we again seek 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>Funding for professional development of tutors and trainers is to be "continued", implying no increase. Given the increased need for such educators, and other financial stringencies in the sector, it is important that funding is increased. Churn in the workforce increases both the need for and the costs of professional development. Addressing churn directly would be a step towards resolving a number of problems, and requires consideration of security of funding of institutions, contracting arrangements and pay rates.</p>
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Workstream 4: We will support and influence other agencies' work, such as by

- sharing our knowledge and resources with the Ministry of Education

Feedback question	Your feedback
<p>Do you agree with the direction of this workstream?</p> <p>Why or why not?</p>	<p>We support closer collaboration between government agencies.</p>
<p>Do you agree with the actions in this workstream?</p> <p>Why or why not?</p>	

What else would improve the Strategy in this workstream? Why?	We are unconvinced that the split of policy from the TEC to the Ministry of Education is productive.
Key targets and indicators to measure the Strategy's success (p7)	
Feedback question	Your feedback
Do you agree on how we will measure our success? Why or why not?	<p>The targets are heavily reliant on course and qualification completions with little or no assessment of quality. This creates risks of gaming. It also takes insufficient account of the benefits to learners of education that goes beyond simply completing a course or qualification. This is particularly true of people with literacy or numeracy needs.</p> <p>There is also heavy reliance on the Assessment Tool without consideration of benefits it does not measure.</p> <p>The use of external progress assessments such as PIAAC provides some indirect assurance as to whether the proposed measures are valid ones, but much more direct evaluations and assessments are needed.</p> <p>We have expressed our concern above at the very low level of ambition for increasing involvement in workplace literacy and numeracy, as well as at the way in which it is proposed to achieve it. The success measures for workplace programmes are a mix of participation (with no assessment) and completions. They leave unaddressed quality concerns, particularly for employer-led workplace programmes for which the targets only seek participation.</p>
Are there other indicators that we should use in addition (or instead) of the proposed indicators and targets?	There should be external assessments of employer-led workplace programmes and assessments of the validity of completions.
Why would they be better?	To better ensure quality provision that addresses learner needs.
An opportunity for final overall comments	
Feedback question	Your feedback
If you were the TEC, what would be the three most important suggested actions you would carry out in	<p>Reinstitute and expand workplace based programmes that give learners/workers control of their learning including literacy and numeracy.</p> <p>Evaluate employer-led workplace literacy and numeracy</p>

2016?	programmes. Expand availability of programmes using qualified tutors and trainers, whether workplace or externally based.
Why have you chosen these three actions?	The attention given to workplace based literacy and numeracy is very inadequate, but in addition it must be of good quality and must take into account the dynamics, including interests and power relationships in workplaces. Quality of provision is a vital issue.
Are there any other areas that we've missed or other comments that you would like to add?	
Do you have any comments on the Strategy's structure, and the content in the Introduction section?	See our introductory section.
Do you have any overall feedback on the Strategy refresh process?	It is disappointing that it has not taken the strategy further forward.

References

- Blumenfeld, S. (2015, July). *A Post-Fordist Dilemma? Precarious Work and Employer-sponsored Training in New Zealand*. Presented at the New Zealand Association of Economists 56th Annual Conference, Wellington, New Zealand.
- Crichton, S. (2009). *Does workplace-based industry training improve earnings?*. Wellington, New Zealand: Statistics New Zealand and the Department of Labour. Retrieved from <http://www.dol.govt.nz/publications/research/publication-view.asp?ID=318>
- Tumen, S., Crichton, S., & Dixon, S. (2015). *The Impact of Tertiary Study on the Labour Market Outcomes of Low-qualified School Leavers* (Working Paper No. Working Paper 15/07). Wellington, New Zealand: Treasury. Retrieved from <http://purl.oclc.org/nzt/p-1762>
- Zuccollo, J., Maani, S., Kaye-Blake, B., & Zeng, L. (2013). *Private Returns to Tertiary Education - How Does New Zealand Compare to the OECD?* (Working Paper No. WP 13/10) (p. 53). Wellington, New Zealand: The Treasury. Retrieved from <http://purl.oclc.org/nzt/p-1568>