

Determination of the Design of Funding Mechanism: Literacy and Numeracy Provision: Adult Literacy Educator (ALE) Fund

Review feedback for the Ministry of Education from Ako
Aotearoa 30 August 2022

Nā āheitanga ā-mātauranga,
Ko angitū ā-ākonga
Building educational capability
for learner success



About Us

Ako Aotearoa is the National Centre for Tertiary Teaching Excellence and represents a unique viewpoint and voice for the tertiary education sector. We welcome the opportunity to work alongside our partners and stakeholders in contributing to future solutions. Our history of research, advocacy and support in tertiary education over many years traverses broad fields of knowledge, sectors and success for priority learner groups. With a specific focus on teaching and learning, our research and expertise can contribute significantly to reconceptualising teaching and learning in a renewed vocational education system.

Every year, Ako Aotearoa manages the national [Tertiary Teaching Excellence Awards \(TTEA\)](#) where the [country's top tertiary educators](#) are celebrated. These awards have been revamped and launched in February 2022 as [Te Whatu Kairangi](#) – the Aotearoa Tertiary Educator Awards. Ako Aotearoa also provides wide-ranging [professional learning and development programmes](#) on Te Tiriti o Waitangi, Kaupapa Māori, Māori Cultural Capability, Māori learner success, Pacific learner success, teaching strategies, technology and online learning, mentoring and assessment. Ako Aotearoa is the [Qualification Developer](#) for most qualifications in the NZQA Teacher Education suite. Search our [Knowledge Centre](#) for innovative resources to support teaching and learning success. We also host and co-host regular strategic forums and events, including [Tuia Te Ako](#), [Pacific Tertiary Education Fono](#), [Talking Teaching](#) and the [NZ Vocational Education and Training Research Forum](#).

Ako Aotearoa has designed and developed a coherent system to help practitioners and organisations better support learners in foundation education. This includes [specialised professional learning](#) on developing language, literacy and numeracy, online communities of practice and the New Zealand [Dyslexia-Friendly Quality Mark](#). In 2022 we plan to launch a new service for organisations under the model [Tapatoru Ako Professional Practice Awards](#) for tertiary educators. For more information about us visit our website: www.ako.ac.nz.

Watch videos about us in [Te Reo Māori](#) and [English](#).

DETERMINATION OF THE DESIGN OF FUNDING MECHANISM: LITERACY AND NUMERACY PROVISION: ADULT LITERACY EDUCATOR (ALE) FUND

Ako Aotearoa warmly welcomes the opportunity to provide feedback on the proposed changes to the Adult Literacy Educator (ALE) fund. Timing is critical in relation to these changes and Ako Aotearoa is well positioned to respond in relation to sector literacy capability development.

The proposed changes in funding are welcome, but the issue of capability development for literacy improvement is a much more complex issue, complicated by the Covid environment. The issues have been exacerbated, and recovery will entail an extended process and proactive interventions. We question the relevance of the ALE in relation to the broader capability development needs of the sector and the fund review provides a key opportunity to positive change for sector teaching capability and outcomes.

Background

In March 2022, Ako Aotearoa produced a [White Paper focused on policy settings for foundation learning](#), including the critical issue of literacy and numeracy capability development. This document is appended, and highlights the increasing challenges faced by the foundation learning, vocational, and trades training tertiary sector in meeting the educational needs of lower-skilled adult learners. It calls for action to meet these challenges and, in considering the changes to the ALE fund, Ako Aotearoa considers it timely to look more broadly at policy settings in relation to literacy and numeracy capability development.

It is our understanding that the ALE fund (originally Adult Literacy Education Grants) is the historical vestige of a temporary measure to assist in professionalising the literacy and numeracy teaching workforce, including vocational educators working at Level 1 and 2. This was not intended as a long-term solution or contribution to resolving the issues related to adult literacy capability development.

The original Adult Literacy Educator Grants (ALEG), renamed Adult Literacy Educator (ALE) fund were set up by the Tertiary Education Commission (TEC) with the intention that they were a temporary measure to professionalise the LN teaching workforce including vocational educators working at L1 and 2.

We understand that there is now only a single provider offering ALE-subsidised NZCALNE (Voc) education, and that this provider is not well-known in the sector for their literacy expertise. The expertise that was developed over the initial development period of perhaps 10 years from 2007 to 2017 has now dispersed, with the bulk of this constrained to that now sitting with Ako Aotearoa.

We are therefore extremely concerned that this localised funding does not represent the best use of funding for an area of critical need in the tertiary sector. We urge the Ministry to reconsider this fund in the context of a much more strategic, integrated, fit-for-purpose approach to the development of literacy capability development. This approach should consider the entire landscape from cabinet policy decisions to the Ministry, Tertiary Education Commission, TEOs, and other key players, including Ako Aotearoa.

Capability Development and Qualifications

Notwithstanding the intensive work done by the TEC over several years to improve the capability of teachers to support literacy development, the report on *The perilous state of literacy in Aotearoa New Zealand* published in March of this year indicates the ongoing significance of the problem. Many of the young people the report identifies will enter tertiary education where their teachers are no better poised to support them than their secondary teachers. Ako Aotearoa's White Paper noted the increase in students entering tertiary education with literacy challenges. With many in the sector having no teaching qualifications, capability development for embedded literacy should be a priority across the sector. While foundation education is critical, the issue exists well beyond this into higher levels of qualification.

The purpose statement of the ALE fund is to "...build an effective literacy and numeracy teaching workforce by increasing the capability of educators and trainers to teach literacy and numeracy skills to adults". The vehicle through which this is currently done is through achievement of the L5 qualification. This goal is not being met to any significant extent.

Ako Aotearoa, as the Qualification Developer for the suite of Adult and Tertiary Teaching qualifications, including the NZCALNE (Voc) and other literacy and numeracy qualifications, strongly supports the achievement of qualifications. However, qualifications are not the only solution, and a diversified approach is likely to lead to more teachers engaging with professional learning and development (PLD). The NZCALNE (Voc) is a 'non-specialist introduction to embedding literacy and numeracy into adult and tertiary education and training'. However, being set at L5 with 400 hours of learning, it requires a significant commitment by teachers and uptake numbers remain stubbornly low. When the qualification review was completed in 2020, the number of enrolments for 2019 was 540 but only 12% (63) of these completed their qualification in that year. Given only one provider is accessing the ALE fund, there is clear indication that a change, or at least broadening, of approach, is required.

NZQA now promotes micro-credentials and Skills Standards as relevant and achievable packages of skill and knowledge development. Other approaches, such as the Tapatoru Framework and Professional Practice Award, commissioned and funded by the TEC and developed by Ako Aotearoa, also provide targeted PLD in a more accessible and manageable way and can result in the awarding of digital badges. The Dyslexia Friendly Quality Mark provide a guided process for organisations to support neurodiverse learners and results in a quality mark award.

In 2021, Ako Aotearoa undertook market research on the capability development needs of tertiary organisations and teachers. While the target audience was current and recent customers of Ako Aotearoa, the survey results indicate that there is a strong demand for educational and teaching capability-building services. Indeed, this is the top priority of almost 50% of respondents and remains critical despite a range of issues identified as potentially impacting individuals' and organisations' ability to build capability. One of these issues is likely to include the 'qualification barrier'. More targeted, practice-based, achievable, and immediately applicable approaches will be needed alongside the qualification if the literacy requirements of tertiary students are to be met.

Similarly, [Ako Aotearoa's White Paper](#) was distributed throughout the sector with an attached survey. The results show that 75% of respondents felt most TEOs are not well equipped to meet the TES objective of improving outcomes for priority learners, including the capability needs related to LLN. Furthermore, 95% of respondents felt more funding opportunities were required. Alternative approaches are critical in resolving these issues.

Funding Regimes

The current funding context creates an opportunity for reconsidering the ALE fund and accommodating diverse approaches such as those outlined above. The United Funding System (in addition to any other investment plan requirements) now has a specific learners' funding component of up to 8% which requires institutions to support learners with low prior achievement to achieve success, and also focuses on priority groups including Māori, Pacific, neurodiverse and disabled learners. This will require institutions to increase the skills levels of their trainers to support these learners through the use of the specific targeted funding and provide evidence of how this is being achieved. This is a very welcome initiative.

In addition, there has been a significant increase in workplace delivery funding which will also require targeted PLD for teachers in these contexts. In environments such as these, an alternative approach to PLD, with associated funding, will provide more options to assist teachers to engage in capability development in this area, particularly in L3-6 non-degree courses.

While these new funding regimes provide an imperative and some contribution to the development of learner capability, it is still unclear as to the broader strategy that specifically targets this critical area of literacy capability development. How will this be achieved unless there is a clear strategy with goals, objectives, and success indicators that can be monitored?

Summary of key issues

1. Ako Aotearoa has engaged with the TEC for several years in relation to the optimal ways for enhancing uptake of PLD in the literacy space. In 2019 we raised our concern that the ALE fund was not used wisely and was underutilised. Having the ALE funding sitting with a single organisation seems unfair and not best use of the fund when there are other significant providers. As signalled above, the uptake of the NZCALNE (Voc) has been quite poor, so the fund has been underutilised and better use can be made of it.
2. For some learners the Tapatoru or Ako Aotearoa's PLD courses are proven to be useful and relevant professional learning options. Ako Aotearoa has previously suggested making the ALE fund available for educators wanting to engage in our PLD. In 2019, TEC transferred the ALE fund (\$271,000) to Ako Aotearoa for this purpose, but it was then found that Ako Aotearoa did not meet the funding conditions, so the money was transferred back to TEC. This is an issue that requires attention. The costs of PLD remains a key constraint to staff engaging in professional learning
3. If there is an inability to shift the fund as outlined above, because this is an issue of ministerial determination, is there an opportunity to address this, particularly in light of the situations and circumstances outlined above? We strongly urge the Ministry of Education to consider multiple options and

pathways for achievement of the goal of increasing teacher/ educator capability, including some of those outlined in this feedback.

4. If there is any reluctance to support this and the associated redistribution of funding, Ako Aotearoa would appreciate the opportunity to discuss options with the Ministry and the TEC, given our current significant experience with literacy capability development in the sector.
5. Attached are the two papers previously supplied to TEC that attend to these issues and provide further background for the Ministry's consideration.

Recommendation

Ako Aotearoa strongly recommends a revision of the policy settings in relation to literacy development. This requires a reconsideration of the most strategic way forward to address an issue causing ongoing concern for learners, educators, TEOs, TEC, and the Ministry.

As part of this reconsideration, we recommend that the Ministry:

1. Disestablish the ALE fund and review and redistribute the funding to organisations such as Ako Aotearoa who are better poised to achieve engagement and capability gains for tertiary teachers. These are all outlined in the recommendations of the White Paper.
2. Take 5 urgent actions as outlined in the White paper:
 1. Support our call to reprioritise adult language, literacy and numeracy, and cultural capability as a national imperative, supported with policy from the Ministry of Education and funding from Vote Education.
 2. Ask officials to work with key stakeholders including Ako Aotearoa to develop a LLN implementation strategy, setting clear objectives and milestones, that builds on the previous 2015-2019 strategy.
 3. Increase funding of key projects that help grow and further evolve services available to support the foundation education and training sector and build sector capability, including the ALNACC programme. For example, increasing professional development opportunities that build on the existing infrastructure, underpinned by the implementation of the Tapatoru framework.
 4. Dedicate the Adult Literacy Educator Fund to organisations and educators committing to engage in professional development in LLN education and cultural capability.
 5. Fund educator participation in professional development programmes supported with Ako Aotearoa digital badges. Note, these programmes are specifically designed to address immediate issues in the sector and have received overwhelmingly positive feedback from the sector.

Ako Aotearoa already has a range of solutions in place and welcomes the opportunity to partner with TEC and the Ministry in this work.

**Prepared by Helen Lomax, Dr Linda Keesing-Styles and Dr David Gough
Ako Aotearoa 30 August 2022**



Background information on proposed revised funding conditions of the Adult Literacy Educator Fund

Introduction

In our recent recommendations for revised funding conditions of the Adult Literacy Educator Fund (ALEF) we proposed a dual pathway to capability building, as outlined in Figure 1.

In this paper we will describe how this dual pathway will work and provide some information on our Capability Building Model and the Tapatoru Foundation Learning Professional Standards Framework. We will also explain the need to widen eligibility under the revised funding conditions.



Figure 1: Dual pathway to capability building

How does the dual pathway work?

A wide range of educators and other practitioners support foundation-level learners in their literacy and numeracy development. The dual pathway to capability building would provide the flexibility needed to meet the diverse needs of this target group. People could move between pathways, as suits their needs, and there are several entry points.

For example, new educators in vocational education tend to have an industry background. They have the industry knowledge and experience needed but are new to

teaching and embedding literacy and numeracy into their delivery. These educators could start on the 'digital badge pathway' by enrolling in an introductory four-week course, which would introduce them to embedded literacy and numeracy, resources and frameworks, and meeting the needs of Māori and Pacific learners.

This approach would give them the confidence they need to enter the qualification pathway and enrol in the New Zealand Certificate in Adult Literacy and Numeracy Education (NZCALNE).

Educators who have achieved the NZCALNE and who have a few years of teaching experience may be keen to continue their learning. For these people the Tapatoru may be the best option to continue their learning pathway. Through the Tapatoru they engage in a reflective process to identify what they are doing well, and what the gaps in their expertise and knowledge may be.

Tapatoru candidates can then identify the professional learning and development (PLD) courses that will help them build their capability in these specific areas. Through this process they will earn digital badges for the Tapatoru level they have achieved, as well as the completion of the PLD courses.

At present there is a big gap in the qualification pathway, as no diploma or degree level adult literacy and numeracy qualifications are currently being offered. The transition from the Level 5 NZCALNE to postgraduate study is simply too challenging.

Our Adult Literacy, Numeracy and Cultural Capability (ALNACC) PLD courses have been designed to bridge this gap. Therefore, new educators could start on the digital badge pathway, then do the NZCALNE followed by relevant PLD courses until they have the knowledge needed to re-enter the qualification pathway and study towards the higher qualifications or gain the Tapatoru award as appropriate.

These are just some examples of how the dual pathway could help people create their own learning journey, that is targeted to their context and professional development needs.

Ako Aotearoa's ALNACC Capability Building Model

Following the review of foundation-level capability building in 2017, the TEC contracted Ako Aotearoa to develop a new model for foundation-level capability building: <https://ako.ac.nz/assets/ALNACC/SUMMARY-Capability-Building-model.pdf>

Key features include the integration of adult literacy and numeracy development with cultural capability; the facilitation of communities of professional learning; the provision of intensive four-week follow-up support to PLD workshops (see Figure 2); and the alignment of PLD courses with the Tapatoru skill levels.

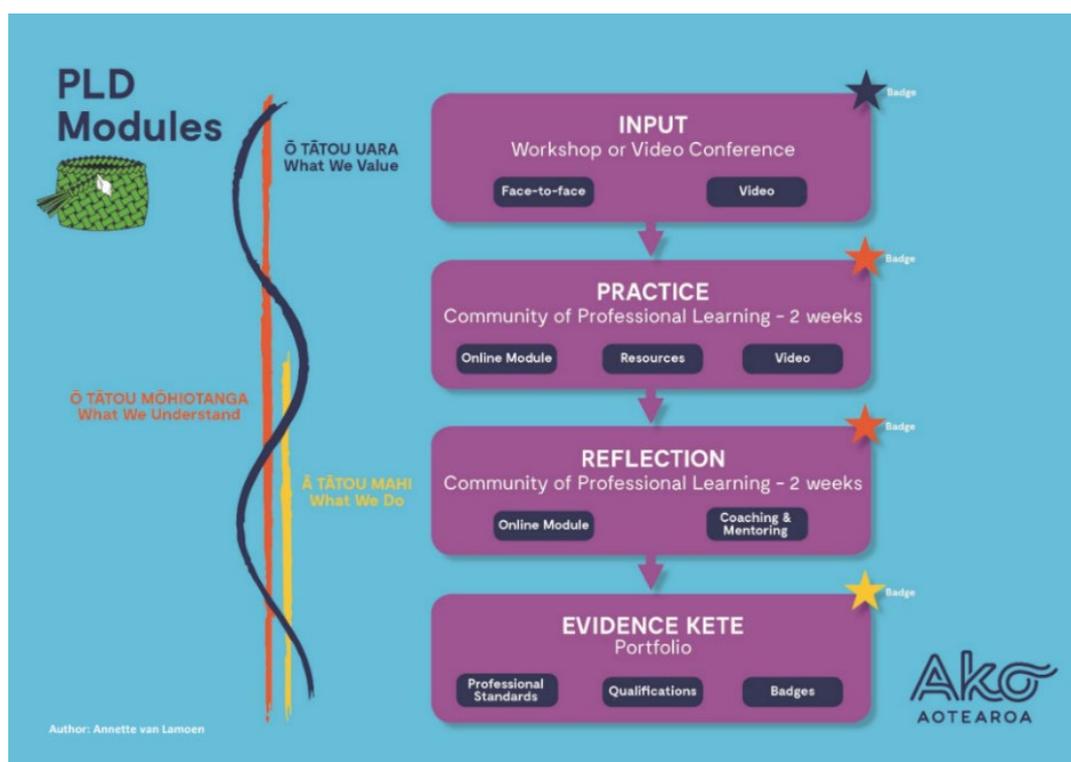


Figure 2: Four-week PLD modules

This clip provides a good overview of the ALNACC PLD offerings and how they align with the Tapatoru:

https://www.youtube.com/watch?time_continue=156&v=nTJ9kUDjOjA&feature=emb_logo

The Tapatoru Foundation Learning Professional Standards Framework

The Tapatoru is a holistic, learner-centred framework that incorporates Mātauranga Māori and integrates three dimensions:

1. Professional values: Ō tātou uara
2. Professional knowledge: Ō tātou mōhiotanga
3. Professional practice: Ā tātou mahi

It was developed as a framework to provide practitioners with professional recognition of their experience and expertise. Practitioners engage in a facilitated reflective process and can measure themselves against the standards. They submit a portfolio of evidence which can lead to them receiving an award at one of four skill levels.

For more information and a clip on the Tapatoru see: <https://ako.ac.nz/about-us/alnacc/foundation-learning-professional-standards-framework/>.

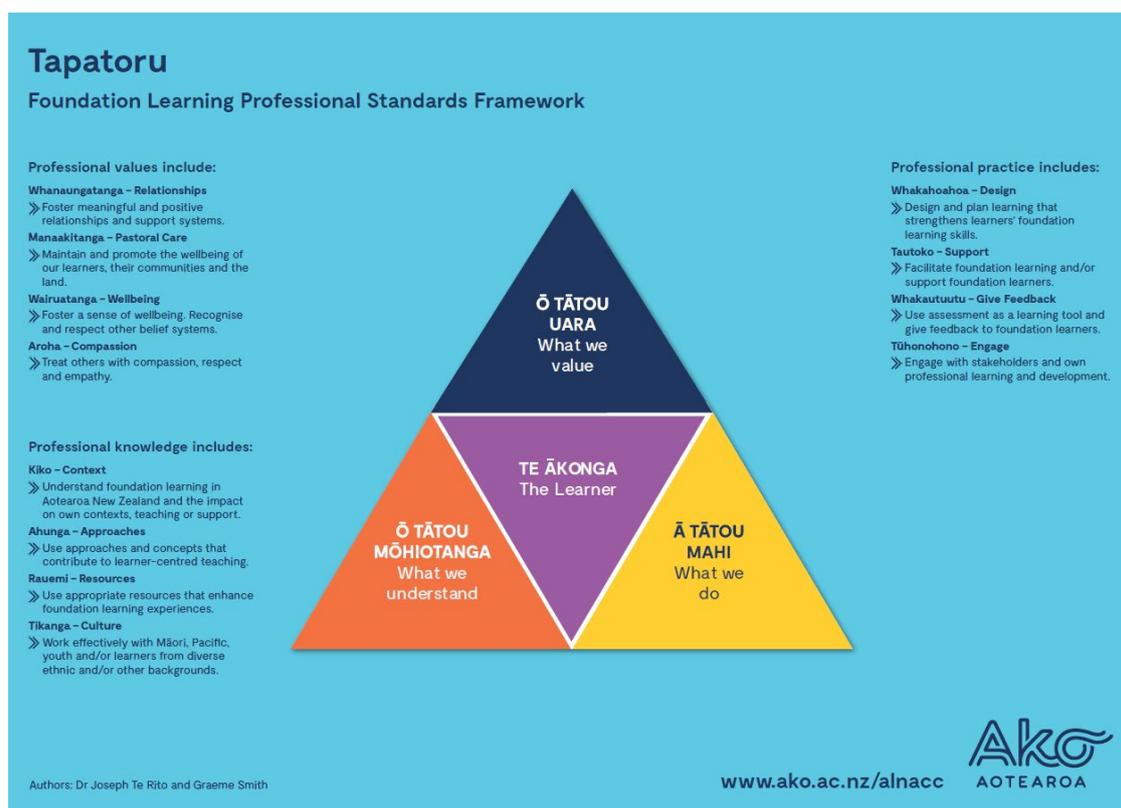


Figure 3: Tapatoru

Need to widen eligibility under revised funding conditions

The current ALEF funding conditions need to be reviewed to widen eligibility to support the dual pathway and to enable Ako Aotearoa to provide free or low-cost courses to foundation sector educators. The conditions currently only allow for the ALEF to be used for study towards a qualification, not the Tapatoru or related ALNACC courses. Note that the creation of this capability building model was in response to an independent review commissioned by the TEC in 2017 on how to lift literacy and numeracy education capability in the foundation-level education sector.¹

Ako Aotearoa as developer and provider of the new capability building model, Tapatoru and related professional learning and development is not an ‘eligible organisation’ under the current ALEF funding conditions. Also, the ‘Fees’ allocation methodology does not support the delivery of the dual pathway, neither are our learners eligible, as they are not enrolled in a ‘programme of study or training leading to an appropriate qualification’. Under the current conditions, the ‘verification of learner identity’ requirements or enrolment records can also not be applied, as the educators are employees of TEOs undertaking ongoing professional learning and development, compared to completing qualifications provided under the National Qualifications Framework.

Furthermore, Ako Aotearoa is hosted by Massey University as the National Centre for Tertiary Teaching Excellence. We do not operate in the same way as a university that

¹ See <https://www.tec.govt.nz/assets/Publications-and-others/ecc370623e/Lifting-embedded-literacy-and-numeracy-foundation-level-education-information-sheet.pdf>

enrols students in degree courses and qualifications. For example, we are not funded through SAC funding, we do not use the SDR or Workspace. We are funded through a funding agreement TEC has with our host, Massey University, to deliver tertiary sector capability building services. Ako Aotearoa negotiates funding agreements directly with the TEC, in a similar way to an organisation such as ACE Aotearoa, although they are funded directly without the hosting arrangement, as they are an independent legal entity.

Conclusion

The Tapatoru and ALNACC PLD courses are designed not to replace the existing qualifications, but to complement them, to provide a bridge between qualifications, and offer a new measure of confidence to employers, TEOs and the TEC with regards to educator capability.

Educators are busy people with heavy workloads and competing demands on their time. A qualification may be hard to fit into their working life.

Having the opportunity to access more bite-sized learning options, which the PLD courses offer, can help them to engage in continuous professional development until they have the time and opportunity to start the study towards the qualification.

Feedback from the sector shows that cost is the main barrier to engaging in the Tapatoru and PLD. Having ALEF study grants available for this pathway would therefore greatly assist in enhancing the uptake of these learning opportunities.

Recommendations for revised funding conditions of the Adult Literacy Educator Fund



June 2020

To: Tayyaba Khan, TEC
Edward Scrimgeour, Ministry of Education
cc: Helen Lomax, Ako Aotearoa

Tēnā koe Tayyaba, kōrua ko Edward,

As part of our TEC deliverables for 2020 we have prepared these recommendations for the revision of the funding conditions of the Adult Literacy Educator Fund (ALEF). I will first provide you with some background information and explain the current challenges in building educational capability in the sector. In the final section I have outlined our recommendations for the revision of the funding conditions.

Background

The purpose of the ALEF is to “support building an effective literacy and numeracy teaching workforce by increasing the capability of educators and trainers to teach literacy and numeracy skills to adults.”¹

The current monitoring and reporting conditions of the ALEF² apply to the administration of this fund when the TEC was supporting the development of the literacy and numeracy infrastructure between 2007 to 2017. Now that the infrastructure is in place, the conditions need to be revised, as they are no longer fit-for-purpose. In fact, the current funding conditions hinder sector capability development under a model fully endorsed and funded by the TEC for building sector educational capability, delivered by Ako Aotearoa since 2017 under the Adult Literacy, Numeracy and Cultural Capability programme.

During the ten years from 2007, the TEC had a strong focus on the professionalisation of the foundation education workforce through qualifications such as the New Zealand Certificate in Adult Literacy and Numeracy Education (NZCALNE). The ALEF was a key mechanism to incentivise TEOs to upskill educators in foundation education.

In 2017, the TEC commissioned Heathrose Research to undertake a review of adult literacy and numeracy teaching capability. The report, *Lifting sector capability to improve outcomes for foundation learners*, identified that the NZCALNE was not a robust measure for determining educator quality in foundation education, and that it did not meet the needs of a diverse workforce with varying levels of educational expertise, knowledge and skills, and operating in a range of settings.

¹ <https://www.tec.govt.nz/funding/funding-and-performance/funding/fund-finder/adult-literacy-educator-fund/>

² https://www.tec.govt.nz/assets/Forms-templates-and-guides/2020-Funding-Conditions-Catalogue_v3.PDF

Recommendations for revised funding conditions of the Adult Literacy Educator Fund

Instead, the reviewers proposed a way forward for the foundation education workforce, which included the development of professional standards, increased focus on Māori and Pacific cultural capability, and the development of communities of professional practice.

The TEC then endorsed this direction by commissioning Ako Aotearoa to develop these workstreams and introduce digital badges as evidence of engagement in professional learning and development (PLD). They also signalled that the ALEF would be redeployed to support this new direction for professional learning and development. They funded the development of the Tapatoru Foundation Learning Professional Standards Framework³, Māori and Pacific Cultural Capability Pathways, a new model for building sector capability⁴, and Adult Literacy, Numeracy and Cultural Capability (ALNACC) PLD courses incorporating Communities of Professional Learning.

In 2019 the TEC allocated the 2019 ALEF, a sum of \$271,000, to Ako Aotearoa to support the development of an effective literacy and numeracy tertiary teaching workforce by providing relevant courses, in-house and public, to eligible tertiary education organisations and practitioners, and accreditation against the Tapatoru Foundation Learning Professional Standards Framework.

However, the TEC subsequently found they were unable to change the conditions attached to the ALEF, as the Minister of Education had already issued the funding mechanism for literacy and numeracy provision, which meant that the fund could not yet be used for the provision of PLD and accreditation against the Tapatoru. As a result, Ako Aotearoa returned the funds to the TEC in 2019.

The TEC then intended to raise the issue with the Ministry of Education and tasked Ako Aotearoa with *working alongside the TEC and the Ministry of Education to review the funding conditions for the allocation of the Adult Literacy Educator Fund (ALEF) from 2021 to better support the uptake of low-cost professional learning and development of educators and trainers and whole organisation teaching capability building (2020 TEC ALNACC contract, Deliverable 6.1.5.)*. This paper sets out our recommendations for reviewing these funding conditions.

Foundation Education Sector Challenges

Heathrose Research signalled in their report that a review of the funding conditions was timely, as the NZCALNE “won’t equip tutors with the skills and knowledge they need to lift the literacy and numeracy skills of foundation learners and needs to be partnered with ongoing PD”.⁵

We are currently in the process of reviewing the NZCALNE as part of our role as the Qualification Developer. Our initial findings include that the current, one-size-fits-all approach is insufficiently effective in building capability in adult literacy and numeracy education in that the qualification is not suitable as the sole pathway to becoming a proficient practitioner.

Furthermore, the qualification cannot cater equally for experienced and inexperienced educators. In addition, it is designed for and targeted to educators, whereas a range of practitioners supports learners in foundation education, many of whom have a need to build their capability, but find that the NZCALNE does not align with their practice or workplace context.

³ <https://ako.ac.nz/about-us/alnacc/foundation-learning-professional-standards-framework/>

⁴ <https://ako.ac.nz/about-us/alnacc/the-capability-building-model/>

⁵ Heathrose Research. (2017). *Lifting sector capability to improve outcomes for foundation learners*. Wellington: Tertiary Education Commission.

Recommendations for revised funding conditions of the Adult Literacy Educator Fund

It has become apparent that practitioners need more flexible learning options and a more tailored approach, whereby a range of training opportunities is available at a range of skill levels targeted to practitioners in a variety of settings.

The Tapatoru foundation learning professional standards awards, in the form of digital badges, cover four different skill levels of practitioners working within a variety of contexts, including:

1. Pastoral care or learning support staff with no or limited teaching responsibilities or new practitioners
2. Teaching and learning support practitioners seeking to expand their understanding and practice
3. More experienced practitioners seeking to extend or verify their understanding and practice as well as a relevant specialisation
4. Highly experienced practitioners with a demonstrated record of effective leadership in the field of foundation-level education.

The ALNACC courses are aligned with these Tapatoru skill levels, and as such cater for the diverse PLD needs in the foundation education sector. They include a range of assessment tasks and participants can be awarded digital badges for course completion and achievement.

While initial uptake of ALNACC courses is positive, it is still not at a scale that will see significant change occurring in the sector, which lacks adequate funds for capability building. With a change in the funding conditions, the ALEF can provide a significant incentive for sector support, and uptake of Tapatoru and other relevant programmes over time.

Recommendations

We therefore recommend a dual pathway to capability building, as outlined in Figure 1, whereby the ALEF can be used to reduce fees for programmes of study that lead to qualifications or digital badges, so that educators and other practitioners can select the programme of study that is best suited to their individual needs and circumstances.



Figure 1: Dual pathway to capability building

Recommendations for revised funding conditions of the Adult Literacy Educator Fund

Not only would this approach be better aligned with sector requirements, but it would also promote the uptake of and engagement with the Tapatoru and ALNACC PLD courses provided through Ako Aotearoa, who has been contracted by the TEC to professionalise the literacy and numeracy education workforce through the effective use of TEC funding. Now is the time to align the funding incentives to better support sector needs.

If the funding conditions were amended, Ako Aotearoa would be well-placed to administer the fund on behalf of the TEC, as previously agreed, and maintain the required records. As the reporting requirements may also be outdated, we propose designing and trialling a new, more appropriate set of reporting measures for 2021 and beyond.

We would welcome the opportunity to discuss our recommendations with you at the earliest opportunity.

Ngā mihi nui,

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