



Introduction

1. Thank you for the opportunity to comment on the draft *Adult Literacy and Numeracy Implementation Strategy*. Ako Aotearoa: The National Centre for Tertiary Teaching Excellence is an organisation funded by both central government and the tertiary education sector to support the best possible outcomes for tertiary learners. Our work towards this focuses on building a variety of strong and collaborative relationships with tertiary organisations, practitioners and learners across the entire sector, in order to enhance the effectiveness of tertiary teaching and learning practices.
2. We appreciate the Tertiary Education Commission (TEC) granting us an extension to the deadline for submissions, and have therefore kept this submission brief. We would be pleased to meet with the TEC to discuss the draft strategy in more depth.
3. Ako Aotearoa supports the broad thrust of the draft strategy and the outlined workstreams, including the addition of workstreams relating specifically to Māori and Pacific peoples, and to promoting cross-government engagement.
4. Specific comments regarding individual workstreams follow.

Workstream 1: Educational Infrastructure

5. While Ako Aotearoa recognises the current constrained fiscal environment facing education agencies, it is critical that the key strategic outcome of "... harness[ing] the fiscal value of, and seek[ing] dividends from, the educational infrastructure" does not impact on the quality of Literacy, Language and Numeracy (LLN) provision and associated outcomes for learners. It is particularly important that, as the draft strategy indicates will be the case, the assessment tool remains free to tertiary providers.
6. Similarly, it would be preferable for additional income gained through the cost recovery options identified in the strategy to be used to support additional investment in LLN capability and provision, rather than simply to offset costs of maintaining educational infrastructure.
7. Ako Aotearoa also believes that the TEC should consider undertaking a formal evaluation / review of the sector's use of the assessment tool. Of particular concern is how the tool is being used to *support* learning, rather than just assess the amount of learning that is taking place.

Workstream 2: Learning Opportunities for Adult New Zealanders

8. Ako Aotearoa strongly supports the strategy's emphasis on evidence, sustainability, and integration within this workstream.
9. With regard to these strategic outcomes, Ako Aotearoa would like to draw attention to the recently-released *Lifting Our Game* report. This report recommended the conduct of a stocktake of LLN provision focused on the effectiveness of the government's investment in this area, and we are pleased to see that the strategy outlines a similar evaluation (proposals 19-22). We would be keen to support or contribute to this evaluation as appropriate. It is important to note, though, that *Lifting Our Game* emphasised that such a stocktake/ evaluation should explore not only direct LLN gain but also wider educational, employment and social outcomes from participating in LLN programmes. This focus on outcomes over time is key to fully understanding the effectiveness and value of government investment in LLN.
10. Similarly, Ako Aotearoa supports the proposal to identify effective practices in embedding LLN (proposal 18), and would be keen to assist with this work.
11. Regarding the Workplace Literacy Fund, Ako Aotearoa agrees that the best outcomes from such funding occur when workplaces themselves become sustainable LLN training environments (proposal 10). However, it is also important to recognise the constrained fiscal environment currently facing many companies, and that it may therefore not be the most suitable time to place more emphasis on employer contribution within the *employer-led sub-fund*. Should this involve requiring a greater financial contribution from firms, it may not lead to reduced overall demand or uptake (given that the fund is over-subscribed), but it may reduce the ability of some – especially smaller – firms to engage with this fund.
12. Ako Aotearoa supports the intention to continue funding the NZCTU's *Learning Representatives* programme. However, we are concerned at what the proposed 'realignment' of the programme (proposal 23) will involve. More explicit attention as to how the programme can meet the needs of Māori and Pacific workers would clearly be a step toward maximising the effectiveness of this initiative. If, however, the intention is to refocus the programme to primarily or solely address the needs of Māori or Pacific peoples, this would seem to be imposing an unwarranted constraint on what has been an effective method of addressing not just LLN need, but employee skill development more generally.

Workstream 3: Professional Development of the Sector

13. Ako Aotearoa strongly supports the proposals regarding qualifications for literacy and numeracy educators (proposals 27-29). However, further consideration needs to be given to the relationship between the requirement for qualifications and the embedding of LLN within other programmes – this could be an element of the review of approaches to embedding described in proposal 18.
14. Ako Aotearoa does have some concerns over proposals regarding the National Centre of Literacy and Numeracy for Adults. As the strategy indicates, the Centre

has been a highly successful investment for the government, and is a key focal point for LLN in New Zealand. In this context, the TEC's decision to withdraw funding – even over a staged period – would appear to create notable risks for the long-term future of the Centre. There appears to be something of a disjunction between the positioning the Centre as a key element within the LLN 'system' at several points in the strategy, and the proposal to then remove its funding.

15. As noted above, we recognise the financial constraints in which the Commission must operate. In this context it is appropriate for the Centre to place a greater emphasis on cost-recovery and generating income from the sector to supplement its funding from the government. However, removing public funding entirely from the Centre may run risks around sustainability and its ability to undertake a leadership role regarding LLN rather than simply servicing the immediate needs of individual LLN providers.

Workstream 4: Addressing Māori and Pasifika Needs

16. Ako Aotearoa strongly supports the development of this as a separate workstream although, as noted above, we do have some reservations regarding the proposed 'realignment' of the Learning Representatives programme.
17. We also strongly recommend that care is taken to ensure that the respective needs of Māori and Pasifika learners are evaluated and addressed separately.

Workstream 5: Cross-government Engagement

18. Ako Aotearoa strongly supports the development of this as a separate workstream. However, the Ministry of Social Development should be included as a key agency along with those listed in paragraph 43.

Conclusion

19. In conclusion, Ako Aotearoa would like to once again extend its thanks for the extension granted to the original deadline for submissions. We would be pleased to assist in any way with the further refinement of the draft strategy.

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¹ Declared interest: Peter Coolbear is presently acting chair of NZCER