

Proposed variations to 2025 funding determinations

Feedback provided by the ACE Sector Strategic Group (ASSG)

Introduction

The Minister for Tertiary Education and Skills has agreed to consult on a range of proposed variations to current funding determinations issued under section 419 of the Education and Training Act 2020 (the Act).

The Minister will consider feedback from affected organisations before deciding whether to proceed with the proposed variations. Any variations to funding determinations following consultation will come into effect on 1 January 2025.

The ACE Sector Strategic Group (ASSG) has prepared feedback on these changes, for consideration and inclusion, prior to the Minister's decision to proceed with the variations.

ACE Aotearoa and the ACE Sector Strategic Group (ASSG)

The Adult and Community Education (ACE) sector is a critical partner in the education system, with a history of engaging with and changing the lives of New Zealanders socially and economically marginalised, and with intergenerational needs that inhibit their success in education and employment.

The ACE sector provides affordable, local education and professional development to communities. It targets adults and offers programmes to improve basic skills, language, literacy, and numeracy, building people's capabilities to seek further education, and employment and promotion within the New Zealand workforce.

ACE Aotearoa established the ACE Sector Steering Group to serve as an authoritative commentator on emerging ACE issues and provide strategic oversight from a sector and stakeholder perspective, for the benefit of all ACE learners.

The current members of the ASSG are:

- ACE Aotearoa
- Ako Aotearoa
- Community Learning Association in Secondary Schools
- English Language Partners NZ
- Literacy Aotearoa
- REAP Aotearoa NZ
- Te Ataarangi
- Workers Education Association (WEA).

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Feedback on Funding Determinations Proposed Changes

1. Adult and Community Education (ACE), and other related foundation funds

For ACE Sector providers, the significant funding determinations issue, related to Foundation Education relates to the use of the word, **online**, and to clarification of the term **face-to-face**. Examples can be found in paragraphs 17 and 25, of the Adult and Community Education (ACE) funding determinations.

Eligible

17. The TEC must ensure that a TEO only delivers eligible programmes face-to-face (for example, not delivered **online** or via distance learning), unless the TEO has received prior written approval for another form of delivery from the TEC due to exceptional circumstances.

Programmes

25. The TEC must attach to funding a condition that a TEO that receives funding under this funding mechanism must ensure that a programme in which an eligible learner is enrolled:

- continues to meet the criteria specified in paragraph 157 of this funding mechanism; and,
- is delivered face-to-face (for example, not delivered **online** or via distance learning), unless the TEO has prior written approval for another form of delivery from the TEC due to exceptional circumstances.

Face-to-face and Synchronous

TEC must ensure that a TEO only delivers eligible programmes involving real-time interaction and collaboration. This can happen through face-to-face learning, and online learning, when provided through synchronous delivery.

The concept of Synchronous Online Learning involves real-time interaction and collaboration and is a proven equivalent to in-person, face-to face-learning. The value of Synchronous Online Learning is that it provides a way to removes any barriers to education from learners who are remote, homebound, anxious about accessing learning in a public environment, and seeking to find time-efficient opportunities to learn.

Experience shows that this form of teaching can also increase the impact of any delivery as whānau also become engaged in the subject matter.

Synchronous Online Learning, unlike Asynchronous Online Learning, maintains high levels of interaction between tutor and learners. It does not replace face-to-face provision, but it does enable greater reach and access to ACE, and a variety of programmes, for New Zealanders throughout New Zealand.

2. ILN and WLN funds

The reference to learners' qualifications remains a difficult criterion for literacy and numeracy learners, where learners may have experienced ill-health, accident or injury-induced changes to their capabilities. In other circumstances, some qualifications, where the practical application of skill is the paramount qualifier, such as through Fine Arts and Whakairo, the level of qualification does not serve as an indicator of language, literacy and numeracy levels.

The best indicator of reliable assessment remains the NZ Literacy and Numeracy for Adults Assessment Tool, with the exception of ESOL learners, and potentially learners who are neuro-diverse, for whom LNAAT is not suitable.

Recommendations to TEC

1. That the term face-to-face be defined to include synchronous teaching via online delivery to facilitate delivery to remote sites.

These changes will require and enable:

- face-to-face learning
- greater access to ACE, and a variety of programmes, throughout New Zealand; and
- connections to be facilitated between ACE provision and the rest of the education system.

2. That the wording for (17) be changed to:

The TEC must ensure that a TEO only delivers eligible programmes of face-to-face and synchronous learning (that is, synchronous classes run in real time, with learners and educators attending together from different locations), unless the TEO has received prior written approval for another form of delivery from the TEC due to exceptional circumstances.

3. That the wording for (25.b) be changed to:

is delivered synchronously (that is, run in real time, with learners and educators attending together from different locations), unless the TEO has prior written approval for another form of delivery from the TEC due to exceptional circumstances.

4. That the LNAAT levels be retained as the key criterion of assessment criteria for most Foundation-level funds and learners, with the exception of ESOL learners for whom LNAAT is not suitable.
5. That the LNAAT levels be retained as the key criterion of assessment criteria for most Foundation-level funds and learners, with the potential exception of learners who are neuro-diverse, for whom LNAAT may not be suitable.
6. That any references to qualifications levels as a key criterion of assessment criteria for most Foundation-level funds be removed.
7. That the following fields of study as identified on the New Zealand Standard Classification of Education (NZSCED) be excluded from the definition - *undergraduate, postgraduate, or Level 5 or above Qualification gained in New Zealand or that is listed on the NZQCF* - allowing TEOs to seek written approval from TEC when applicable for learners.
 - 090314 Tikanga – Māori Customs
 - 091502 Te Reo Māori
 - 100101 Music
 - 100103 Drama and Theatre Studies
 - 100105 Dance
 - 100106 Ngā Mahi a Rēhia (Māori Performing Arts)
 - 100199 Performing Arts not elsewhere classified
 - 100506 Ngā Mahi a te Whare Pora (Māori Weaving)
 - 1003 Visual Arts and Crafts.

Closing Comments

It is internationally recognised that the most vulnerable in our communities often engage in ACE learning as their first step into achieving positive and successful educational experiences. Throughout New Zealand, we engage with over 81,000 learners, and potentially more with the inclusion of the unfunded section of the sector.

For this part of the sector, the current funding requirements can be onerous to small, and new, ACE NGOs, and they remain reliant on volunteer contributions, and small grants and donations. The ASSG would like it noted that for these small providers the parameters of the funding process administered by the TEC are narrow, with excessive requirements that can be extraneous for the level of funding that these providers would apply to receive.

The ACE sector continues to advocate for greater social investment by Government to create a broader view of outcomes, providing greater value for money, and through effective local solutions, enabling reduced benefit dependency and effective support for people back to work.

The ASSG seeks the opportunity for conversations with the Ministry of Education and the TEC to consider new and additional contributions of the ACE sector towards the current government agenda. Significantly, we see the value in scoping the ways the ACE sector can enhance opportunities for the expected future workforce of Aotearoa, noting that it is understood that it will be primarily made up from Māori, Pacific and Asian communities – the communities we work alongside to create transformative and relevant successful outcomes.

We welcome any questions or discussion regarding our feedback. Please contact:

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