

Accelerated Change in the Senior Secondary School

A paper from Executive

1 Background

1.1 PPTA Annual Conference 2010

At PPTA's 2010 annual conference, members called for a range of workload control measures to alleviate some of the demands of implementing the realigned achievement standards across three levels. Conference delegates called for:

- Teacher Only Days (TODs),
- Assessment limits of 20 credits per course,
- Job sizing of the principal's nominee role,
- The establishment of the PPTA NCEA Workload Taskforce, and;
- Increased support for teachers to implement the various changes to teaching and assessment.

This paper reports on what has happened, and what is still taking place (or not), as well as exploring the impact of youth guarantee initiatives on the senior school.

2 NCEA workload

2.1 The stress of standards alignment

PPTA's term four 2010 workload survey demonstrated high levels of stress amongst members, as they prepared to implement the revised level one standards. Neither the Ministry of Education (MOE) nor the Qualification Authority (NZQA) met published deadlines, and many of the promised assessment resources were not fit for purpose.

Members' predictions that stress levels were likely to increase during 2011 and 2012 as the level two implementation rolled out have proved correct. There are still numerous problems across a number of subjects, which are compounded by ongoing communications issues from central agencies in Wellington.

2.2 PPTA Survey June 2011

The June 2011 branch survey showed strong but variable views on the question of possible implementation delays for NCEA levels two and three (for full results see the PPTA website).



What remains clear is that teachers continue to experience high levels of frustration arising from MOE and NZQA failure to provide assessment tasks and resources in a timely fashion; that the best practice moderation workshops, whilst useful, are expensive and difficult for many teachers to access and that what the central agencies continue to offer schools is generally too little, too late.

2.3 The work of the workload taskforces

PPTA's NCEA workload taskforce met in November 2010 and developed a set of recommendations which informed the work of the new NZQA workload advisory group. The NZQA group, which included significant PPTA member representation, developed 23 recommendations under the following headings:

- Nature of assessment;
- Support for assessment;
- Moderation;
- Communications including websites;
- Principal's nominee role; and
- Kura.

The group's recommendations are attached as **Appendix 1**.

The ministry and NZQA developed a response to the recommendations organised according to:

- What has been done already;
- What is being done;
- What will be done; and,
- What will have to wait.

This document is attached as **Appendix 2**.

2.4 What will have to wait?

Critically, the bulk of the recommendations organised under "what will have to wait" are those likely to make a significant positive difference to teacher workload. Hence, PPTA has serious reservations about either the MOE and/or NZQA's ability to enact the types of changes that will offer any significant support to secondary and area school teachers, certainly within the next couple of years.

2.5 Reducing Moderation

In particular, the requirement for moderation of 10% of student work places a huge burden on teachers and one, moreover, not justified by the current agreement rates. The external moderation agreement rates for the NCEA for 2010 reached levels right at the top of what could ever be expected, given that



some element of subjectivity will always exist in a standards-based assessment system that seeks to enable holistic assessment. Far fewer samples are required for statistical validity, probably only around 2-3% of all work.

The 10% requirement is a political over-reaction to media attacks on the credibility of NCEA. The workload around moderation will not decrease until politicians find the courage to publically support our indigenous qualification and the professionals who deliver it.

2.6 Fewer Credits is better

The 2010 annual conference passed a recommendation encouraging members to set an upper limit of 20 credits per course. Even though teachers do not always find this straight-forward, offering slightly fewer credits in a course can have a positive impact on teacher workload, as well as moving students towards a more positive focus on teaching and learning, rather than on preparation for assessment. Merit and excellence endorsements for NCEA certificates and courses may also encourage students to achieve fewer credits at a higher level, rather than gathering as many 'achieved' credits as possible. Although there are exceptions, a continued focus on offering no more than 18-20 credits per course is likely to benefit teachers and students, and PPTA continues to endorse this.

2.7 Teacher Only Days (TODs)

Ongoing lobbying resulted in the provision of two Teacher Only Days (TODs) for NCEA alignment work this year. PPTA and Secondary Principals' Council (SPC) continue to lobby the minister to make a further commitment to four TODs in each of 2012 and 2013, ideally to be announced during 2011, so that schools have time to plan for their inclusion in their yearly calendars. The provision of TODs is one of the easiest mechanisms for reducing workload and at minimal cost. The proposed TODs are run by teachers for teachers but supported by online resources prepared by NZQA.

Teachers need time to work together on the ongoing alignment and implementation issues. TODs offer a smart and simple response and PPTA will continue to lobby for these.

3 Secondary-Tertiary interface

3.1 Life-long learning; short-term funding

Governments of various stripes have flirted with lifelong learning, seamless pathways, youth transitions, access to tertiary and workplace training, and the like, for a number of years, all with a goal of ensuring students go on to work or further education or training.

While many schools currently use the very successful Gateway programme and the Secondary Tertiary Alignment Resource (STAR) to support transitions from school to work and further study, the government's focus in the youth guarantee policy shifts the focus and funding away from secondary schools to tertiary



institutions. The resulting policy is, in PPTA's view, strong on rhetoric and weak on co-ordinated implementation, communications or support for schools.

3.1 Unintended Effects

The rhetoric is about reducing the number of NEETs (youth aged 16-19 who are Not in Employment, Education or Training), but early signs are that this group is mostly unrepresented in the new trades academies and other youth guarantee programmes. Rather than focusing on students at risk, the new academies (and other secondary-tertiary programmes) are taking students who *may be* or are *not at risk* of educational failure or alienation at all. The reason for this is simple; in order to maintain funding levels, tertiary providers have to show evidence that students complete their courses. This model means that tertiary providers would rather take students who have a proven track record (e.g. NCEA level one or near level two completion) than unqualified school leavers or NEETs.

3.3 Quarterly Funding

The youth guarantee is being funded by stripping an estimated \$6 million a year out of secondary schools. When a student moves from secondary to other education providers (or work) schools lose funding. This may sound logical but has the effect of diminishing the curriculum range and pastoral support available to all those students who remain at school. Should a student change their mind and return to school during the same academic year, as is already happening, the funding ought to return to the school but presumably minus the cut that has already gone to the tertiary provider.

The most disappointing aspect of this cut to secondary school budgets is that the evidence, including from the Prime Minister's own science adviser Sir Peter Gluckman¹, is that intervention needs to be early in the life of the child to be effective. A policy that provides support to disengaged students **once** they have left school is doomed to fail. Before it provides for another 7,500 youth guarantee places as proposed in the 2011 Budget, the government needs to look carefully at what is **not** being funded and the consequences of that.

Without the certainty of funding that secondary schools (and other providers) need, useful and flexible pathways for students may not emerge. In the end, the only 'guarantee' may be of another cost-cutting model dressed up to look like student choice.

3.4 The first casualty of competition is truth

Although there are a number of successful trades academies based in secondary schools² the ministry preference seems to be for lead roles in trades academies to be offered to tertiary providers. This is despite their comparative

¹ For more discussion the Gluckman report, *Improving the Transition:*

Reducing Social and Psychological Morbidity During Adolescence, see PPTA News July 2011
<u>http://www.ppta.org.nz/index.php/resources/publications/doc_download/1158-ppta-news-july-2011-volume-32-no5</u>
² Some examples of secondary school trades academies are here:
http://www.edgazette.govt.nz/Articles/Article.aspx?ArticleId=8413

PPTA Annual Conference Papers 2011



lack of experience in offering pastoral guidance to teenagers, and, indeed, the impossibility of them ever replicating anything like the range of support secondary schools provide through form periods and extra-curricular activities.

Regardless of the rhetoric of dual enrolment and flexible learning, the system design would appear to be channeling students out of schools and into tertiary environments, rather than offering pathways that are genuinely flexible and responsive.

3.5 Vocational Pathways

In the light of this, PPTA is supportive of the ministry of education initiative aimed at developing clearer vocational pathways for NCEA.³ Consultation is currently underway with secondary and tertiary sector representatives and industry training organisations, with a view to releasing the pathways qualification proposals in early 2012.

PPTA acknowledges that students are best served by a range of learning contexts and opportunities - particularly as they reach the school leaving age. However, much of the developing 'youth guarantee' appears to be focused on saving government money and on replicating programmes that are already working in schools (eg, Gateway). If New Zealand is to develop truly responsive and flexible learning pathways for our young people, there will need to be significantly more work done to provide adequate funding, along with clear frameworks and brokering that allows the notion of dual enrollment to work (in both directions).

3.6 Careers advice

One of the perennial questions that arises under a system that supports student choices is whether they are sufficiently informed to make valid selections. As a result, there has been an intensified focus on careers advice. Careers New Zealand has, somewhat unhelpfully, developed a set of 64 performance benchmarks in the belief that this will assist careers advisers.⁴ For busy teachers, who already have more than enough to do without having overly detailed audits and performance indicators pushed onto them, this is extremely disappointing.

Clearly a more sensible approach would be to invest in ongoing access to quality PLD, including visits with relevant industry and tertiary providers. The MOE pathways advisory group has also noted concerns about the currency and effectiveness of careers advice in schools. These concerns are grounded in an obvious lack of both time and support for careers advisers, who are currently funded to fulfill the role on the smell of the proverbial oily rag.

³ <u>http://www2.careers.govt.nz/educators-practitioners/career-edge/career-edge-june-2011/clearer-career-pathways-for-young-people/</u>

⁴ <u>http://www2.careers.govt.nz/educators-practitioners/career-education/planning/guidelines-and-effective-practice/career-education-benchmarks/</u>



Given the government's intense focus on qualifications and career pathways for young people, now is the time to ensure that any changes to the role of school careers advisers are useful and supportive, unlike the compliance-focused benchmarks currently in development.

4 Summary

Unfortunately, there is still very little light at the end of the tunnel from senior schooling to further education, training and work. The NCEA rollout continues to rely on large doses of teacher goodwill, in the face of lagging timelines from under-resourced teams at the ministry and NZQA. Meanwhile, the youth guarantee appears to be as much of a political football as it ever was. Clear analysis and implementation that does not prioritise one sector over another, along with support for students with the greatest needs, is required.

Recommendations:

- 1. That the report be received
- 2. That PPTA endorse the work of NZQA's workload advisory group and demand urgent action to implement all its recommendations.
- 3. That PPTA continue to advocate for an 18-20 credit assessment guideline per course.
- 4. That PPTA call for further Teacher Only Days for NCEA curriculum alignment work, four in 2012 and four in 2013.
- 5. That PPTA continue to monitor the various Youth Guarantee initiatives, with particular focus on teacher workload, student pathways, and funding to secondary schools.
- 6. That PPTA call for improved time allowances and training for careers advisers, and for the careers grant (CIG) to be increased.



Proposed recommendations for reducing workload to NZQA and the Ministry of Education

Nature of assessment

1. That appropriate and targeted support for teachers is provided on effective course design. For example, how to use one assessment task to assess more than one standard within a subject and for two or more subjects.

Support for assessment

- 2. That it is made clearer to schools that:
 a) best practice workshops are available to all teachers; and,
 b) NZQA can be flexible about the delivery of best practice workshops
- Best Practice Workshops need to be formally acknowledged as excellent professional development and be funded (cost of BPW and teacher release) centrally for as many teachers as possible.
- 4. That workshops are provided on how to write assessment tasks.
- That support for assessment is provided by ensuring all material on TKI is quality assured and fit for purpose; and that published timelines are adhered to (change creates considerable work for teachers).
- 6. That more professional support time is funded for all teachers with regard to the alignment of standards, for example teacher only days.

Moderation

- That NZQA reduce the sample of work to be moderated for the purpose of reporting agreement rates. Moderators could then undertake other moderation activities such as:
 - a. moderating more work from poorer performing schools and departments, amount as agreed between school relation managers and principal's nominees;
 - b. moderating more optional teacher selected evidence;
 - c. providing more professional support for assessment;
 - d. identifying valid assessment tasks and resources which are saved into an item bank available to all teachers.
 - e. developing good quality assessment tasks and resources;
- That it is made clear to teachers that optional teacher selected evidence (OTSE) can be used:
 - a. for any curriculum related internal achievement standard
 - b. to pose questions to moderators about the interpretation of standards
 - c. to support internal moderation
- That during the transition to the new standards, those standards are not selected in the random sample for reporting agreement rates. In their first year of use the moderation is just feedback.
- 10. That systems are developed so that electronic submission of student work for moderation can be accepted, including digital blogs via e.g. Google docs.



11. That an assessment/moderation, blog/chat facility be developed online, which includes direction to subject specific mentors/resources for internal moderation support; and that questions submitted online are gathered and responded to by moderators.

Communications including websites

- 12. That NZQA and the Ministry work together to produce simple, clear communication to schools in one channel of authoritative information on NCEA.
- 13. That more guidance is provided on how to interpret and use NZQA's website including the Web Statistics.
- 14. That the Web Statistics are upgraded: for example, to give more functionality to group standards and get a report; and to show whether there is a statistically significant change in individual standard achievement compared to previous year.
- 15. That the sector is consulted on a generic statistics format, to be made available nationally by March each year, e.g. NCEA Level 1, 2, 3, ethnicity, gender, decile, course/certificate endorsement, literacy and numeracy

Principal's nominee role

- 16. That the principal's nominee email contains a specific column that has information that needs to be disseminated to the whole school staff.
- 17. Best practice guidance should be issued on how principal's nominees can best carry out their responsibilities as detailed in the rules and procedures; this guidance needs to be an online living document, focussed on new principal's nominees.

Kura

۳.

- That NZQA publish previously translated examination materials as references to support assessment.
- That an index of words is provided for subject terms that do not have clear Te Reo Māori equivalences.
- 20. That an online forum is created for the sharing of materials and ideas among kura.
- 21. That useful resources available in English are re-contextualised for kura.
- 22. That professional development cluster workshops aimed at kura be provided.
- 23. That achievement standards for the Marautanga o Aotearoa be developed.

Appendix 2

The New Zealand Qualifications Authority and Ministry of Education response to the NCEA Workload Advisory Group's recommendations for reducing teacher workload

NZQA and the Ministry established the NCEA Workload Advisory Group (Advisory Group) to address concerns about teacher workload. The secondary school sector has indicated to NZQA that the workload associated with delivering NCEA is very high for teachers and school administrators. The Advisory Group was tasked with identifying the main workload problems and proposing recommendations to reduce teacher workload. Particular attention was placed on examining:

- internal and external moderation
- the amount of assessment
- administration including data transfers
- access to / production of quality assessment resources.
- the role and functions of the Principal's Nominee
- the role of School Relationship Managers

The Advisory Group was composed of 22 people selected for their understanding of the assessment and administration issues involved with NCEA and their capacity to look for practical and creative solutions. The members were selected by NZQA and the Ministry in consultation with the PPTA. The aim was to form a group representative of New Zealand secondary schools including: rural, urban, and Māori, and within these, representative of decile, size, location and subject areas, as well as having a cross section of professional roles within the schools. The members are listed in Appendix 1.

The Advisory Group had three meetings in March, May and June, and the recommendations were finalised in July.

NZQA and the Ministry have considered the recommendations and have provided a response to each recommendation categorised according to:

- What has been done already
- What is being done
- What will be done
- What will have to wait

What has been done already

Recommendation 6: That more professional support time is funded for all teachers with regard to the alignment of standards, for example, teacher only days.

Action: NZQA and the Ministry took this recommendation to the Minister when the recommendations were still draft and the Minister approved two teacher support days in 2011 to aid schools in the preparation for the new standards.

Recommendation 12: That NZQA and the Ministry work together to produce simple, clear communication to schools in one channel of authoritative information on NCEA.

Action: NZQA and the Ministry have developed a joint agency periodic update which will be known as *NCEA Update*. The *NCEA Update* will be the channel of authoritative information on NCEA. It will not replace existing channels of communication from both NZQA and the Ministry but will be a summary publication containing links to the information published by both agencies about NCEA in the time since the previous update. The purposes of the *NCEA Update* are:

- to communicate upcoming developments in NCEA with one voice
- to ensure consistent and accurate sharing of information and avoid duplication
- to maintain and strengthen the credibility of NCEA
- to support the effective implementation of ongoing developments
- to serve as an additional summary publication.

The updates will focus on NCEA and other secondary school related developments (such as university entrance and New Zealand Scholarship), and provide a summary of upcoming activities. The first edition will be published mid-August 2011.

Recommendation 16: That the principal's nominee email contains a specific column that has information that needs to be disseminated to the whole school staff.

Action: This section has been added to NZQA's principal's nominee update.

Recommendation 18: That NZQA publish previously translated examination materials as references to support assessment.

Action: NZQA arranges the translation of externally assessed standards each year for the ones requested. The translated examinations are already available on the subject pages on NZQA's website. <u>http://www.nzqa.govt.nz/qualifications-standards/qualifications/ncea/subjects/</u> A list of the external standards translated in 2010 is available on NZQA's website <u>http://www.nzqa.govt.nz/qualifications-standards/qualifications/ncea/subjects/</u> The assessment schedules are not translated, and work to do this will be considered in the response to Recommendation 21.

Recommendation 19: That an index of words is provided for subject terms that do not have clear Te Reo Māori equivalences.

Action: NZQA does have glossaries of terms <u>http://www.nzqa.govt.nz/qualifications-standards/qualifications/ncea/subjects/</u>

There are listed glossaries for Science and Technology, Mathematics and Statistics and Social Studies. These glossaries do also include a wide range of more general terms.

NZQA will arrange a meeting with relevant parties to establish whether these glossaries meet the required need or if there are gaps that need filling.

What is being done

Recommendation 2: That it is made clearer to schools that:

- a) best practice workshops are available to all teachers; and,
- b) NZQA can be flexible about the delivery of best practice workshops

Recommendation 8: That it is made clear to teachers that optional teacher selected evidence (OTSE) can be used:

- a. for any curriculum related internal achievement standard
- b. to pose questions to moderators about the interpretation of standards
- c. to support internal moderation

Action: NZQA will produce a circular clarifying the above information giving examples of flexible delivery of best practice workshops and examples of what has been sent in via OTSE to give teachers an idea of what they can submit.

Recommendation 5: That support for assessment is provided by ensuring all material on TKI is quality assured and fit for purpose; and that published timelines are adhered to (change creates considerable work for teachers).

Action: The Ministry and NZQA will work together to ensure resources on TKI have a statement saying they are fit for purpose, new standards will have quality assurance statements. The time line for this will coincide with the transition arrangements for the implementation of the curriculum-aligned standards.

Recommendation 7: That NZQA reduce the sample of work to be moderated for the purpose of reporting agreement rates. Moderators could then undertake other moderation activities such as:

- a. moderating more work from poorer performing schools and departments, amount as agreed between school relationship managers and principal's nominees;
- b. moderating more optional teacher selected evidence;
- c. providing more professional support for assessment;
- d. identifying valid assessment tasks and resources which are saved into an item bank available to all teachers;
- e. developing good quality assessment tasks and resources.

Action: NZQA is working on this. At present NZQA is subject to a Government directive to moderate 10 per cent of student work, so Government approval is necessary to make changes to the current moderation arrangements. If the Government approves changes to be made, NZQA can look into redistributing moderators' time to achieve recommendations 7a, b and c.

Recommendation 7d, less than one per cent of assessment tasks submitted for moderation are original and there are intellectual property issues that would need to be considered before saving these into an item bank. Also an item bank would only be secure until an assessment task or resource was used for the first time. NZQA and the Ministry propose that having more assessment tasks and resources available, as per recommendation 7e, would meet the desired outcome of recommendation 7d.

Work in relation to the Youth Guarantee will see the development of new assessment resources, and could be useful for all teachers. However, recommendation 7e will require resourcing.

Recommendation 9: That during the transition to the new standards, those standards are not selected in the random sample for reporting agreement rates. In their first year of use the moderation is just feedback.

Action: This is possible, and will be part of the proposed changes to moderation as outlined in the response to Recommendation 7.

Recommendation 17: Best practice guidance should be issued on how principal's nominees can best carry out their responsibilities as detailed in the rules and procedures; this guidance needs to be an online living document, focussed on new principal's nominees.

Action: The best practice guidelines will be published in mid-August. It will be alerted to principals via Bali Haque's principal's newsletter.

Recommendation 23: That achievement standards for the Marautanga o Aotearoa be developed.

Action: The Ministry is developing achievement standards for the Marautanga o Aotearoa.

What will be done

Recommendation 13: That more guidance is provided on how to interpret and use NZQA's website including the Web Statistics.

Recommendation 14: That the Web Statistics are upgraded: for example, to give more functionality to group standards and get a report; and to show whether there is a statistically significant change in individual standard achievement compared to previous year.

Recommendation 15: That the sector is consulted on a generic statistics format, to be made available nationally by March each year, e.g. NCEA Level 1, 2, 3, ethnicity, gender, decile, course/certificate endorsement, literacy and numeracy

Action: NZQA is commencing a review of the Web Statistics; some upgrades are planned for January 2012 and more substantial upgrades in January 2013. Consultation will be held with some sector representatives on a generic statistics format.

What will have to wait

Recommendation 1: That appropriate and targeted support for teachers is provided on effective course design. For example, how to use one assessment task to assess more than one standard within a subject and for two or more subjects.

Recommendation 3: Best Practice Workshops need to be formally acknowledged as excellent professional development and be funded (cost of BPW and teacher release) centrally for as many teachers as possible.

Recommendation 4: That workshops are provided on how to write assessment tasks.

Recommendation 7: That NZQA reduce the sample of work to be moderated for the purpose of reporting agreement rates. Moderators could then undertake other moderation activities such as: e. developing good quality assessment tasks and resources.

Recommendation 22: That professional development cluster workshops aimed at kura be provided.

Action: Recommendations 1, 3, 4, 7e and 22 are requests for more, and a wider range, of teacher professional development seminars and access to more resources.

NZQA will continue with the popular best practice workshops. Funding would need to be sourced to diversify the selection of seminar types and to finance teacher release and the cost of best practice workshops.

The requested workshops will reduce workload because teachers who attend such seminars will have raised confidence and expertise at assessing standards and become quicker at developing and marking assessments.

Recommendation 10: That systems are developed so that electronic submission of student work for moderation can be accepted, including digital blogs via e.g. Google docs.

Recommendation 11: That an assessment/moderation, blog/chat facility be developed online, which includes direction to subject specific mentors/resources for internal moderation support; and that questions submitted online are gathered and responded to by moderators.

Recommendation 20: That an online forum is created for the sharing of materials and ideas among kura.

Action: Capital investment will be required to deliver Recommendations 10, 11 and 20 and will be put into plans for future development.

Recommendation 21: That useful resources available in English are re-contextualised for kura.

Action: Capital investment is required to action this recommendation as well as finding the relevant expertise. Translating assessment schedules should be considered under this work.

Members of the NCEA Workload Advisory Group

Mary Ann Terry Tim Sam Garv Rebecca Sue Turuhira Lara Denise Gil Michelle Brenda Tony Martin Clare Gavin Colin Karen Angela Nichola Michael

Baxter Principal Burrell HoD Cameron HoD HoD Cunnane HoD Davis Grantham HoD Green Deputy Principal Teacher/Senior Manager Hare Hearn Principal's Nominee Johnson Deputy Principal Principal Laurenson Assistant Principal Maris McNaughton HoD Melton Principal's Nominee Mitchell Principal's Nominee HOD Neven Parratt HOD/PN Riseborough Principal's Nominee Russell Deputy Principal Seyb HOD Shanley HoD Tarry Teacher

Hamilton Girls' High School **Onslow College** Napier Boys' High School Hamilton's Fraser High School Te Wharekura o Arowhenua Otorohanga College St Mary's College Te Wharekura o Ruatoki Queens High School Wellington High School Otahuhu College Otaki College Mt Roskill Grammar Lincoln High School Hamilton Girls' High School Otahuhu College Mt Roskill Grammar School Massey High School Northcote College Greymouth High School Burnside High School Whangarei Boys High School

2011 Annual Conference Minutes

Minutes of the Annual Conference of the New Zealand Post Primary Teachers' Association (Inc) held at the Brentwood Hotel, Kilbirnie, Wellington, commencing at 9.45 a.m. on Tuesday 18 October 2011, continuing at 8.45 a.m. on Wednesday 19 October and 9.00 a.m. on Thursday 20 October 2011.

Accelerated Change in the Senior Secondary School

C11/96/12

- 1. THAT the report be received; and
- 2. THAT PPTA endorses the work of NZQA's workload advisory group and demand urgent action to implement all its recommendations; and
- 3. THAT PPTA advises all members that the Teacher Only Days in 2011, 2012 and 2013 announced by the Minster are for NCEA curriculum alignment work and should be used solely for that purpose; and
- 4. THAT PPTA continues to monitor the various Youth Guarantee initiatives, with particular focus on teacher workload, student pathways and funding to secondary schools; and
- 5. THAT PPTA calls for improved time allowances and training for careers advisers, and for the Careers Information Grant (CIG) to be increased, and for the Careers Adviser Allowance to be increased to the equivalent of a management unit.

Carried unanimously