



**PPTA submission on proposed repeal of  
Communities of Online Learning and changes  
to correspondence education**

**April 2018**

## **1. About PPTA**

PPTA represents the majority of teachers engaged in secondary education in New Zealand, including secondary teachers, principals, and manual and technology teachers.

Under our constitution, all PPTA activity is guided by the following objectives:

- To advance the cause of education generally and of all phases of secondary and technical education in particular;
- To uphold and maintain the just claims of its members individually and collectively; and
- To affirm and advance Te Tiriti O Waitangi.

This submission is from the PPTA Executive, and is on behalf of all of our members.

## **2. General comment**

PPTA supports the position taken in the recent paper from the MoE, and is much more comfortable with the direction that this policy appears to now be heading. The questions are useful as a starting point, and we have made some suggestions below to reframe them as the discussion goes on.

Below are our responses to the four questions in the discussion document.

## **3. What are your views on the repeal of COOL?**

PPTA supports repealing the legislation creating Communities of Online Learning. It was rushed, un-consulted and poorly conceived, with little awareness shown of the impact on the wider school sector or the students involved. The PPTA's policy position on COOL is set out below.

*PPTA does not support the creation of COOLs on the basis that:*

- a. private for-profit providers do not have a good track record of educational provision*
- b. competition between online providers and brick and mortar schools is not a sound basis for improvement of the education system*
- c. full time online learning must have managed and restricted entry for school age students.*

*PPTA supports the development of online learning in order to:*

- a. provide students access to subjects or particular learning opportunities at a school that they are enrolled at which may not be able to offer them in a face-to-face class*
- b. provide access to education for students who are isolated or unable to attend regular schools*
- c. provide access to education for students who are unable to attend public schools for other reasons, such as health or alienation from the school system*
- d. support teachers to teach their specialist subjects*
- e. support teachers to access PLD*
- f. enrich and supplement face-to-face learning for all students.*

*In all cases online education which is part of the compulsory schooling sector, whether full time or blended should:*

- a. be delivered by New Zealand registered teachers*
- b. be free to students/parents, ie. fully funded by the government*
- c. be based on the NZC/Te Marautanga*
- d. ensure the physical and emotional well-being of students.*
- e. be fully accountable via ERO and subject to the Official Information Act.*
- f. be funded on the basis of actual costs incurred in delivering an education that meets the above tests, and recognises schools' fixed costs.*

Having a range of public schools able to provide online learning, subject to the same quality controls as any other school, may be a desirable option, but there are a number of things that should be considered. One is that choice between providers is not necessarily a way to drive up (or even ensure) quality, as Treasury

and the OECD have noted. Furthermore, competitive duplication of services/provision may be a very wasteful use of public resources. Public schools have proven themselves very capable of behaving highly competitively even when they are just competing in a limited geographical area, with the effect being winner and loser schools (and therefore students) and this could be exacerbated if competition is opened up nationwide.

PPTA would favour managed and planned entry to online learning, both for providers and for students choosing it. This should be done with as little bureaucracy as possible, and for students could be negotiated with school pastoral and academic staff, parents and the online provider.

In terms of the model for online learning, developing models which encourage collaboration, cooperation, specialisation and sharing of practice and resources should be a priority. It would be disastrous for all the online providers to simply try and develop the cheapest/highest volume courses and leave the difficult and expensive ones alone, and it would also be a great shame to break down the collaborative networks that have already developed within the VLN model, and the connections of Te Kura to schools.

#### **4. What should the Government consider to support the effective development of high quality online learning?**

Before answering this question, it would be worth enquiring into what is known about the differences between high quality online learning and high quality face to face learning? Which characteristics would be the same in both, and which would vary?

It's our view, and research would appear to bear this out, that there would be a lot of similarities and few significant differences. With this in mind – practices such as delivery by uncertified teachers, not using the NZC or Te Marautanga, and minimal student-teacher contact would all be unlikely to be characteristics of high quality online learning.

A singular and comprehensive definition of the practices, processes and policies which constitute high quality teaching (let alone 'high quality learning') is challenging to find, however the Best Evidence Synthesis 'Quality Teaching for Diverse Students in Schooling' provides part of an answer. It's important to note that the ten practices identified by Alton-Lee are clearly things that teachers do, and they are not necessarily directly able to be readily influenced through policy levers.

Essentially, it's important to recognise that there is a big gap between 'high quality learning' and the aspects of education that policy makers can readily influence. With this in mind then – what elements of policy are more likely to lead to quality teaching and learning in an online environment?

There are a lot of different policy approaches that can be applied to this question. These include, legislation, regulation, funding, on-going support, and monitoring and accountability.

There is some evidence from overseas in regards to these things, as well as from New Zealand's own experiences with online and distance education. PPTA believes that key features of the policy would include:

Use of trained and registered teachers

Keeping student : teacher ratios low

Institutions that are publicly run and accountable to parents and wider community through the same channels as other schools

Teachers belonging to professional networks and communities of practice

Student enrolment that is managed and controlled – negotiated choice rather than totally open choice

Furthermore, the system level implications of the policy must be considered alongside the implications for students undertaking online learning. If there is significant shifting of resources, or 'cream skimming' of talented and motivated students, online education may appear to be highly successful, but the overall impact on the system may be negative.

We would be interested to explore whether the government is interested in (publicly) delivering high quality online learning, or enabling (and supporting?) the development of it? These would lead to very different policy approaches.

There is a significant difference between the provision of resources for self or teacher directed online learning versus truly 'online learning' in the sense of replacing the wider curriculum and pastoral responsibilities of a school.

**5. What do you see as the opportunities and barriers to enabling any state school to provide distance education, if they have the infrastructure to do so?**

Barriers:

- Knowledge and expertise

Few teachers have experience or training in online education, and there has been no sustained or comprehensive professional learning available for teachers in this. Furthermore, there is limited research in online teaching and learning, that the MoE clearly discovered when undertaking the policy development for COOLs.

- Funding model/sufficiency/certainty

Certainty and sufficiency are very important elements of funding for any educational institution. Online institutions that lead to much greater mobility of students (and thus uncertainty of funding), funding models that don't account for fixed-costs, or that prioritise flexibility over workforce security all could have severely negative implications for schools. Whether or not schools choose to pursue the option of providing distance/online education or offering it to their students will depend heavily on these factors.

- Industrial implications

There are challenges with reflecting and recognising the employment situations of online teachers in employment frameworks such as collective agreements. Teachers teaching online have the right to belong to the

teaching workforce in the same way that other teachers do – and one of the critical aspects of this is being covered by the appropriate collective agreement. In many industries working online means insecure employment, inferior terms and conditions and less connection with other professionals – these all must be avoided to ensure that online learning doesn't become a cheap and nasty alternative to face to face provision.

A much more positive alternative to this is establishing and supporting specific online teaching roles within the public system and collective agreements.

- Student enrolment

An issue with enrolment is the responsibility of different institutions to each other and to students who are dual enrolled. For networks of schools that are undertaking online teaching, this is more readily overcome, as they have established relationships and mutual responsibilities. For institutions where the relationship is purely contractual there may be an incentive on the host school not to provide the additional support – leading to the situation that currently sometimes occurs of online students being left to their own devices in a library or such like, without access to extra support beyond what they can get online.

The other issue with enrolment is to what extent it is free choice, facilitated or managed through gate-ways or application processes. PPTA does not favour totally open choice of enrolment, with the risks to students who may not be suited to online learning and the risks to schools of funding uncertainty being two of the main reasons for this. PPTA's preference is for facilitated entry to online learning, as described above.

- Institutional models

There are no institutions other than registered schools under the Education Act 1989 that can receive state funding to deliver the curriculum to school age students, a situation which PPTA supports. However, we believe that it would be worth the ministry exploring direct employment of some teachers by

regional MoE offices or 'intermediary' institutions that could link schools together – and this could be a place to 'host' some groups of online teachers. This would need to connect with the review of Tomorrow's Schools.

Opportunities:

- Kahui Ako
- VLN model
- Blended models

All of the above represent opportunities for the education system to develop online teaching and learning in a way that enhances the current system and builds on existing strengths.

**6. How can online learning, and in particular, online distance learning, be used to improve education outcomes for children and young people at risk of disengaging or in need of additional learning support?**

This is a difficult question, because there is a lot of evidence to suggest that students at risk of disengaging and in need of additional support do worse in non-face-to-face learning.

The research that the MoE contracted in 2017 into this provides some insight here. The message seemed to be that designing online/distance education for students who are motivated and high-achievers is straightforward, but for the 20% of students most at risk, it is very difficult.

The need for face to face pastoral support and guidance for at-risk learners, even those learning full time online has been well established. Te Kura's work with these groups of students has in some instances, we understand, demonstrated the effectiveness of this.

At risk learners, whether online or face to face, often require support from and access to a wide range of professionals and adults with different skill sets and capacities, and it's important that the online learning institutions recognise this.