



Literacy Aotearoa
Choice Change Freedom

**Annual Education Code of Practice (CoP)
Evaluation and Review
Report**

2025

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Report Approved by:

Te Tumuaki/ Chief Executive

Evaluation Rubric

		Well-implemented The Code is well-implemented
		Implemented The Code is implemented
		Developing implementation Implementation of the Code is underway, yet requires further work
Early stages of implementation Implementation of the Code has not yet started or requires significant work	• No or limited understanding of Code outcomes and requirements across the organisation • No or limited perspectives sought. Practices to reflect learner voice non-existent or underway • No or limited consideration of Te Tiriti o Waitangi/Treaty of Waitangi and the Treaty principles (including partnership, protection, and participation) when implementing the Code. • No or limited practices in place to monitor against all Code outcomes and requirements • No or limited reporting processes from self-review	• Some understanding of Code outcomes and requirements across the organisation • Some perspectives sought, including adequate practices, to reflect learner voice • Some consideration of Te Tiriti o Waitangi/Treaty of Waitangi and the Treaty principles (including partnership, protection, and participation) when implementing the Code. • Some practices in place to monitor against all Code outcomes and requirements • Adequate reporting processes from self-review
	• Sufficient understanding of Code outcomes and requirements across the organisation • Multiple perspectives sought, including sound practices, to reflect student voice • Good consideration of Te Tiriti o Waitangi/Treaty of Waitangi and the Treaty principles (including partnership, protection, and participation) when implementing the Code. • Relevant practices in place to monitor against all Code outcomes and requirements • Effective reporting processes from self-review	• Thorough understanding of Code outcomes and requirements across the organisation • Diverse range of multiple perspectives sought, including robust practices, to reflect learner voice • Full consideration of Te Tiriti o Waitangi/Treaty of Waitangi and the Treaty principles (including partnership, protection, and participation) when implementing the Code. • Well-established practices in place to monitor against all Code outcomes and requirements • Highly effective reporting processes from self-review

Executive Summary

Annual Education Code of Practice (CoP) Evaluation and Review Report 2025

The 2025 review confirms that Literacy Aotearoa continues to meet the intent and requirements of the Education (Pastoral Care of Tertiary and International Learners) Code of Practice. Learner wellbeing, safety, voice, and inclusion remain central to the organisation's culture and daily practice.

Wellbeing and safety are embedded across strategic planning and systems. The Learner Success Plan and Disability Action Plan 2022–2026 guide improvements in accessibility, assistive technologies, and data visibility. Oversight by the Health and Safety Committee and regular self-review processes ensure that wellbeing systems remain responsive and transparent.

Open communication and early intervention allow most learner concerns to be resolved quickly and informally, with no cases escalating to formal complaints. Work is underway to centralise and establish a national complaint register and to make complaint and feedback processes more visible and easier to access for all learners. These actions aim to improve consistency, transparency, and reporting across the organisation.

Learning environments are safe, inclusive, and culturally responsive. Kaiako and coordinators provide flexible delivery that meets learners where they are and promotes equity and belonging. Accessibility improvements, including assistive technologies and clearer physical and digital standards, are being implemented progressively across sites.

Health, safety, and wellbeing systems are well established. Reported incidents and hazards have been minor and managed appropriately, with no critical incidents during the reporting period. Learners are supported to access local services and practical assistance when needed.

Overall, the Code of Practice is fully implemented across Literacy Aotearoa. The organisation maintains a strong, culturally grounded approach to learner wellbeing, safety, and inclusion, supported by continuous improvement in systems, communication, and staff capability.

Outcome 1: A learner wellbeing and safety system

Providers must take a whole-of-provider approach to maintain a strategic and transparent learner wellbeing and safety system that responds to the diverse needs of their learners.

Elements		Indicators (Provider must....)	Evaluative Statements (How effectively? / How do we know?)
1	Strategic goals and strategic plans	- Have strategic goals and strategic plans for supporting the wellbeing and safety of their learners - Regularly review their goals and plans - Make amendments to plans within a reasonable timeframe - Work proactively with learners and stakeholders – and document this work	Learner wellbeing and safety are embedded within the strategic planning and self-review systems of Literacy Aotearoa. The organisational strategy sets out five pou that guide all activity: empowering people, leveraging technology, championing relevant pedagogy, growing partnerships, and embedding equity and Te Tiriti o Waitangi across all operations. These pou frame the organisation's commitment to safe, inclusive, and equitable learning environments.
2	Self-review of learner wellbeing and safety practices	- Regularly review the quality of their learner wellbeing and safety practices to achieve the outcomes and practices of this code - Review practices by using input from diverse learners and relevant quantitative and qualitative data - In a timely manner, follow a self- review to address any deficiencies in learner wellbeing and safety practices	The Learner Success Plan links strategic intent directly to learner wellbeing. It identifies targeted actions to remove barriers to participation, increase digital inclusion, and improve support for priority learners, including disabled ākonga and those with complex learning needs. The plan is monitored through periodic reporting and annual review to Te Koruru, ensuring that wellbeing objectives remain current and measurable. The plan also outlines coordination with external agencies and community networks that contribute to learner safety and holistic support. The Disability Action Plan 2022–2026 provides a structured framework for equitable participation and access. The 2025 update notes progress on the introduction of assistive devices, including Chromebooks and Pen Readers, and reports increased data visibility of disabled learner achievement outcomes. These developments reflect a practical application of organisational goals to learner wellbeing and safety.
3	Publication requirements	- Make information set out in Element 2 readily available, in accessible formats, to stakeholders, including on websites (where available)	
4	Responsive wellbeing and safety systems	- Gather and communicate relevant information across their organisation and from relevant stakeholders to accurately identify emerging concerns about learners' wellbeing and safety or behaviour. Take all reasonable steps to connect learners quickly to culturally	Systematic self-review processes are used to evaluate wellbeing and safety practices. Evidence from the 2025 Self-Assessment Summary shows that wellbeing and safety are reviewed through organisational reporting cycles and incorporated into the annual quality-assurance schedule. EBS, Risk Wizard, and other dashboards track learner engagement, feedback, retention, and outcomes, allowing sites and clusters to identify trends. Learner voice is obtained through surveys, hui, and feedback collected via the

		appropriate social, medical, and mental health services. - Provide staff with ongoing training and resources tailored to their roles in the organisation - Have plans for assisting learners, and responding effectively, in emergency situations in the learning or residential community (whether localised or more widespread)	Learner Engagement Process, ensuring that reviews include both quantitative data and direct input from diverse learners. Self-review findings are used to guide improvement, such as refining enrolment documentation, strengthening data capture for learner support, and improving accessibility of published information. Responsive wellbeing and safety systems are maintained through national and regional structures. Health and Safety Committee meetings provide oversight of incidents and review of practices, while the Quality Management System (Te Kete Mauri Ora) sets out procedures for emergencies and wellbeing responses. Staff training is ongoing and extends beyond pedagogy to include first aid, mental health awareness, learner engagement, and other areas of health and safety relevant to their roles. This approach ensures that kaiako and support staff are equipped to respond appropriately to a wide range of learner needs and situations. Code publication requirements are being met. The Code of Practice Review 2024 summary have been published in accessible formats on the Literacy Aotearoa website and shared across the organisation. Overall, Literacy Aotearoa has clear strategic goals, monitoring systems, and review processes that support learner wellbeing and safety. The strategic action plans show alignment between high-level intent and operational delivery. Regular self-review and transparent reporting provide assurance that wellbeing and safety remain central to decision-making and continuous improvement across the organisation.
			Overall Evaluation Outcome: Implemented

Continuous Improvement Action Plan:

Task	Person Responsible
Progress the review and development of policies and procedures (including learner-wellbeing related) as part of strengthening the Quality Management System (QMS).	National QA Manager + Policy Owners
Revisit the learner-wellbeing reporting system as part of a wider educational metric and KPI reporting redesign.	Director, Teaching and Learning + National QA Manager

Outcome 2: Learner Voice

Providers understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.

Elements		Key Indicators	Evaluative Statements (How effectively? / How do we know?)
1	Learner Voice	- Practices are in place to build and maintain effective relationships with diverse learner groups. - Practices provide formal and informal opportunities to actively hear and engage with diverse learners and their communities. - Practices ensure timely and accessible resources are available to learners and their communities to support participation in decision-making. - Practices ensure timely and accessible information is provided to learners to increase transparency in decision-making processes.	Evidence from the cluster discussions shows that learner voice is a well-established part of the culture and approach at Literacy Aotearoa. Kaiako and coordinators described “meeting learners where they are at” and adjusting delivery to suit each learner’s needs, readiness, and goals. This approach reflects a culture of care, connection, and respect that is evident across all sites. Learners feel welcomed and supported in ways that uphold their dignity and encourage honest communication. Feedback is gathered through conversation, informal check-ins, and reflection, alongside structured tools such as the Learner Engagement Process, Application Form, Initial Needs Assessment, and Individual Learning Plan. These tools help capture each learner’s goals, progress, and support needs, providing a strong base for individualised learning. Cluster discussions highlighted that while feedback is gathered and acted on effectively at site level, there is an opportunity to strengthen communication back to learners about what has been done in response. Staff agreed that showing learners how their feedback leads to improvement would reinforce trust and encourage continued participation.
2	Learner Complaints	- Learners are supported, treated respectfully, and engaged in a fair, timely, and culturally responsive complaint process. - The complaints process is clearly communicated, accessible, and includes options for support and collective complaints. - Complaints are properly recorded, monitored, and reported annually with analysis of trends and learner experience. - Learners are informed of progress, outcomes, and next steps, including external resolution options if unresolved.	Concerns raised by learners are addressed quickly and informally through open communication with kaiako or coordinators. Learner concerns raised at site level have been resolved effectively through early intervention and conversation. Common learner concerns have included mismatches in expectations and miscommunication between kaiako, learners, and partner organisations, along with occasional conflict between learners in shared learning spaces. Actions taken included cluster staff mediating and resolving issues, reassigning kaiako or moving learners to another class where needed, and reviewing communication and coordination processes to better align expectations. De-escalation and quick resolution have been the main

3	Compliance with the Dispute Resolution Scheme	• Be familiar with the relevant Dispute Resolution Scheme rules for domestic and international learners and ensure compliance with those rules in a dispute to which it is party	approaches, resulting in no concerns escalating to formal complaints during the reporting period. This outcome reflects the strength of site-based relationships and the proactive approach of staff in identifying and managing potential issues before they escalate. Complaints are handled with care and fairness. Most are resolved quickly through open conversation and a focus on understanding and resolution. This reflects the organisation's inclusive and relational culture. Improvements have been and will continue to be implemented to strengthen how complaints are recorded and monitored. Several existing registers have now been consolidated, and moving forward, a single national register will be maintained. This will enhance recordkeeping, reporting, and evaluation by ensuring data on complaints is collected consistently across all sites. The consolidated register will also support the identification of recurring themes and inform organisational improvement. Further work is planned to make the complaints process more visible and easier to access, including clearer templates, online forms, and transparent guidance around timeframes and outcomes. Reflective sessions following complex matters are also being considered as part of staff wellbeing and professional learning. Additional opportunities exist to ensure that the complaints process is accessible to all learners, including those with low literacy levels and disabilities. This could include reviewing the language used in policies and forms, providing verbal explanations, and offering flexible ways to raise concerns. Plain-language information and multiple modes of communication would ensure all learners can participate with confidence. Staff are familiar with the intent of the Code and demonstrate fairness, open communication, and respect for learners in their practice. Increasing awareness of the external dispute-resolution scheme would further strengthen staff capability to guide learners towards all available pathways. Updated learner materials and on-site information could make this process more visible and accessible. Overall, Literacy Aotearoa demonstrates strong alignment with the intent of Outcome 2. The organisation's culture promotes open communication, trust, and responsiveness to learner needs. Systems already support learner voice and complaint resolution effectively, and the
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			suggested improvements provide a clear direction for strengthening communication, accessibility, and data use across all delivery sites.
			Overall Evaluation Outcome: Implemented

Continuous Improvement Action Plan:

Task	Person Responsible
Establish a clear process to communicate with learners how their feedback has informed changes and improvements in programmes and other relevant activities.	Director, Teaching and Learning + CIO
Provide staff training to support practice on cultivating open, relationship-based communication practices that draw on talanoa, whakawhanaungatanga, and other culturally relevant approaches across teaching and learner support activities.	National People Manager
Improve accessibility and visibility of complaints and dispute-resolution procedures to learners with disabilities.	Director, Teaching and Learning + National QA Manager
Provide de-escalation training for kaiako to strengthen skills in managing challenging situations safely and maintaining a calm, supportive environment.	National People Manager

Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments

Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.

Elements		Indicators	Evaluative Statements (How effectively? / How do we know?)
1	Safe and inclusive communities	- Practices actively prevent and respond to discrimination, racism, bullying, harassment, and abuse to ensure a safe and inclusive environment. - Cultural, spiritual, and community needs and aspirations of all learners and staff are recognised, upheld, and promoted. - Learners have access to information, spaces, and opportunities that build understanding, connection, and collective responsibility for inclusion.	Literacy Aotearoa provides learning environments that are safe, inclusive, and supportive of learner wellbeing. The culture across the organisation is relational and grounded in care, connection, and respect. Opportunities remain to make some processes more consistent and to strengthen documentation and accessibility across all delivery sites. Kaiako, Cluster Managers and Coordinators strive to create learning spaces where learners feel secure and valued. From enrolment through to daily delivery, attention is given to how learners are welcomed, how learning areas are set up, and how shared expectations are established. Safety is viewed holistically, combining physical, emotional, and cultural wellbeing. Kaiako respond quickly and calmly when issues arise and draw on relationships with local agencies and community services when further help is needed.
2	Supporting learner participation and engagement	- Learners are provided with safe and supported opportunities to actively participate and share their views within their learning environment. - Learners are encouraged and enabled to connect, build relationships, and develop social, spiritual, and cultural networks. - Māori learners are supported to use te reo and tikanga Māori to strengthen their identity, culture, and sense of belonging.	Participation and engagement are supported through flexible and responsive delivery that meets learners where they are. For example, classes are held in community locations, marae, and libraries so that learners can participate without the barrier of travel. Timetables are sometimes adjusted to align with local bus schedules. In some instances, learners are involved in co-creating class guidelines to set clear boundaries and shared expectations. Kaiako use relational strategies such as shared meals, check-ins, and group discussions to build trust and belonging. These approaches encourage learners to re-engage with study and develop confidence in their learning.
3	Physical and digital spaces and facilities	- Learning environments are healthy, safe, and support the wellbeing of all learners. - Access barriers to facilities and services are identified, addressed, and removed where possible to ensure equitable participation. - Learners, where appropriate, are engaged and involved in the design and improvement of physical and digital learning environments.	Learners who experience anxiety, sensory sensitivity, or other challenges are supported through practical adjustments such as access to quiet rooms, smaller class sizes, or flexible timetables. This approach allows learners to remain engaged while working at a pace that suits their circumstances. Pastoral care is immediate and personal. Many sites maintain strong links with local support providers that can assist with issues such as mental health, housing, or food support. While these practices are well embedded, the introduction of a

single curated directory of support services available and maintained centrally will make a lot of difference.

Cultural inclusion is visible in daily practice. The use of te reo Māori, tikanga, and other culturally grounded methods is common in greetings, karakia, and class activities. These practices affirm identity and strengthen belonging. There is an opportunity to promote these approaches more consistently across all regions so that cultural responsiveness is visible and embedded in every site. Providing clear examples of good practice and ongoing guidance for new staff will help sustain this work.

Recent improvements in some sites include better lighting, upgraded furniture, accessible entry points, and rearranged layouts that improve visibility and movement. Emergency procedures are explained during orientation, and periodic drills are carried out to keep learners familiar with evacuation routes and safety expectations. Where facilities are shared with partner organisations, coordinators manage the relationships carefully to ensure that learners have safe and private areas to work in.

According to the Literacy Aotearoa Disability Action Plan update, the organisation has made measurable progress in embedding accessibility and disability support into its operations. The update records that several actions under the plan's first two focus areas (Accessibility and Participation and Data and Monitoring) have been completed. Specifically, assistive devices such as Pen Readers and Chromebooks have been deployed across multiple clusters to enhance participation and independent learning for disabled ākonga.

The update also confirms that EBS tagging of disabled learners has been implemented with the intention of improving visibility of participation and outcomes. Additionally, site accessibility reviews have been undertaken in several regions, leading to adjustments to learning spaces and teaching resources.

Professional development has been provided for kaiako and staff to strengthen confidence in supporting disabled learners and understanding reasonable adjustments. The report notes that medium-term actions such as standardising accessible digital

resources and expanding adaptive technologies are currently in progress, while long-term actions focus on embedding accessibility principles into programme design and infrastructure planning.

Digital access is steadily improving. Some learners need extra support with devices or online platforms, and kaiako respond with patience and practical help. Several sites now use assistive technologies such as text-to-speech software and C-pens to support learners with literacy or sensory challenges. Making these tools available in all locations will strengthen inclusiveness. The Accessible Journey Checklist and related accessibility standards are being introduced progressively. More training and oversight will ensure every site applies these standards fully and consistently.

Learners who need additional help are connected to community and wellbeing services. Developing a central directory of trusted agencies would make it easier for kaiako to find and refer learners to the right support. This would also help ensure equitable access to assistance, particularly in regions where service availability varies.

Accessibility of information and processes also needs attention. Using plain language in policies and forms, giving verbal explanations where appropriate, and offering multiple ways for learners to provide feedback or raise concerns will help ensure that learners with low literacy or disabilities can take part confidently in all aspects of learning.

Literacy Aotearoa’s practice shows strong alignment with the intent of Outcome 3. Learners experience learning environments that are caring, culturally responsive, and attentive to their wellbeing. The organisation’s systems and culture continue to reflect its commitment to safety, inclusion, and equity. The suggested improvements will build consistency, enhance accessibility, and make better use of learner feedback to guide future planning and quality development.

Continuous Improvement Action Plan:

Task	Person Responsible
Provide training and support all staff to embed te reo Māori, tikanga, and other culturally relevant practices across teaching, learner engagement, and daily operations.	National People Manager
Develop a central directory of community, wellbeing, and support services to assist Kaiako and site staff in making timely referrals for learners who need extra help.	CIO + Cluster Coordinators and Staff
Increase access to assistive technologies and digital tools to support learners with literacy, sensory, or physical needs.	Director, Teaching and Learning
Expand and promote the use of the Accessible Journey Checklist and related accessibility standards across all sites, supported by training, review, and ongoing sharing of good practice.	Cluster Managers + National People Manager

Outcome 4: Learners are safe and well

Providers must support learners to manage their physical and mental health through information and advice, and identify and respond to learners who need additional support.

Elements	Indicators (Provider must....)	Evaluative Statements (How effectively? / How do we know?)
1 Information for learners about assistance to meet their basic needs	- Learners have access to clear and timely information about services that support their basic needs such as housing, food, and wellbeing. - The organisation works with learners and external partners to provide relevant support and advice tailored to learner circumstances. - Learners are encouraged and supported to identify, manage, and seek assistance for their basic needs through accessible and responsive systems.	Health and Safety and Incident reporting was further developed through the appointment of a National People Manager. The use of Employment Hero to record incidents, hazards, and near misses has increased staff awareness and proactive reporting. Reported incidents, near misses, and hazards both onsite, offsite and within the immediate community surrounding our sites are recorded in a centralised reporting system. These are monitored and reviewed regularly, with trends and follow-up actions discussed at the monthly Health and Safety Committee meeting. Over the past period, reported incidents, near misses, and hazards have included a range of minor injuries and health-related matters, general security and behaviour issues, property and maintenance items, electrical and fire-related checks, accessibility considerations, and offsite local environmental factors such as nearby fires and smoke. All matters were appropriately managed at the time, with actions taken to address or minimise potential risks.
2 Promoting physical and mental health awareness	- Learners are provided with regular opportunities and experiences that promote their physical, mental, and emotional wellbeing in ways that are relevant to their needs and context. - The organisation actively promotes credible and culturally responsive information and practices that support positive health, safety, and wellbeing. - Learners receive timely and accurate information about accessing health and wellbeing services, reporting concerns, and making positive choices that	In line with the organisation's definition of a critical incident, as outlined in the Critical Incident Policy, no critical incidents have transpired or been reported during this period. Operationally, Literacy Aotearoa supports learners to stay safe and well through information, proactive monitoring, and care-based practice. Kaiako and coordinators respond to learner needs with empathy and professionalism, maintaining strong community links that ensure learners can access help when needed. The organisation's culture reflects genuine concern for learner wellbeing and a focus on timely support, with opportunities to strengthen national coordination and better visibility of information and processes. Processes are in place to help learners identify and manage needs such as food, clothing, and accommodation. Learners are informed during enrolment and through the Learner

		enhance their overall wellbeing and connection to their culture and identity.	Engagement Process about the types of assistance available. Many sites have links with community groups and local services that can provide practical help. Learners' nominated contacts are kept on file so that communication can occur, when appropriate, for safety or wellbeing purposes. Some learners find it difficult to ask for help directly. To make support accessible, staff provide quiet one-to-one opportunities, check in regularly, and explain that assistance is confidential. Printed materials, classroom posters, and local contact lists are used to remind learners where they can find help. Maintaining visible and consistent information about community and emergency supports will ensure that all learners can reach assistance without hesitation.
3	Proactive monitoring and responsive wellbeing and safety practices	• The organisation maintains accurate, up-to-date contact and nominated person details, with clear processes for when and how they may be contacted regarding learner wellbeing or safety. • Learners are supported to communicate health, mental health, or safety concerns in confidence through accessible, culturally appropriate, and well-promoted channels, with clear pathways for assistance. • The organisation has proactive systems for identifying learners at risk, responding to disruptive or harmful behaviours, and supporting learners to re-engage in study following wellbeing-related interruptions.	Health and wellbeing are key part of some programmes being offered (ex. Well Steps). In some instances, topics like ergonomics, exercise, posture awareness, nutrition and balanced daily routines have been introduced. Some sites have previously delivered ergonomics sessions to help learners maintain safe and healthy study habits. Others participate in community programmes that encourage regular physical activity and connection. Health awareness is understood as an essential component of learner success. Staff show care in recognising early signs of fatigue, stress, or isolation and respond promptly through conversation or referral. Moving forward, there is value in refreshing and expanding ergonomics and movement-based sessions and promoting national and regional wellbeing initiatives through visible materials and health and wellbeing information. Furthermore, professional learning has strengthened staff awareness of mental health. Further opportunities to propagate practice across regions will ensure consistency and confidence when supporting learners experiencing pressure or distress. Processes are in place to identify, monitor, and respond to learners who may be at risk or experiencing wellbeing concerns. Attendance, engagement, and direct communication are used to track learner progress, with follow-up occurring when issues arise. Health and Safety Committee hui are held regularly to review incidents and near-misses. These meetings help ensure oversight and continuous improvement of safety practices. Employment Hero is used to record health and safety incidents across the organisation.

		Arrangements are made to accommodate learners with disabilities or other access needs. Adjustments to learning spaces, pacing, or digital tools are handled locally. Developing a national framework for these arrangements will help ensure equitable treatment and common expectations for accessibility across all physical and digital environments. Literacy Aotearoa maintains strong engagement with ākonga through structured reflection and feedback tools. Learner Value Statements are used nationally to track growth in skills, confidence, and self-management. Data from 2023 to 2025 shows a significant proportion of learners report higher confidence, motivation, and interest in further learning, demonstrating active participation and positive learner-voice engagement. Learners also consistently note that their programmes met or exceeded expectations, with very high recommendation rates and trust across diverse priority groups.
Overall Evaluation Outcome: Implemented		

Continuous Improvement Action Plan:

Task	Person Responsible
Investigate Indigenous health and wellbeing models that can be used to guide future learner health and wellbeing campaigns and align organisational approaches with culturally grounded practice.	Director, Teaching and Learning + National People Manager
Investigate developing a simple learner newsletter that will announce student-related matters, upcoming courses, and health and wellbeing information aligned with key themes (ex. Mental Health, Anti-Bullying, Diabetes Awareness, Water Safety) throughout the year.	CIO + Cluster Managers
Consider running Wellbeing Days or Wellbeing Weeks on a term schedule to normalise health conversations and make support visible across sites.	Cluster Managers
Provide targeted professional development for kaiako on handling complex wellbeing situations and ensuring they maintain their own safety and wellbeing while supporting learners.	National People Manager
Support staff to conduct regular wellbeing check-ins with learners using simple reporting processes that enable early identification of concerns and timely follow-up.	Director, Teaching and Learning + National QA Manager