

2 June 2022

Consultation on Network Management

We are pleased to provide comment to the Ministry of Education on the Priorities for National and Regional Statements and new network management regulations for licensed early childhood services.

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand (ECNZ) is an Incorporated Society of members committed to high quality early childhood education for every child. Established in 1963, the organisation is an influential leader in shaping today's early childhood sector through advocacy, policy, tertiary education qualifications and professional development programmes.

We advocate for early childhood education services and the teachers | kaiako who provide education to thousands of infants, toddlers, and children | tamariki. Our members are drawn from a diverse range of community-based, privately-owned, kindergarten and homebased early childhood education services.

Te Rito Maioha is also a registered Private Training Establishment (PTE) with the highest Category One rating for a tertiary provider. We are accredited and approved by New Zealand Qualifications Authority (NZQA) to deliver a range of undergraduate, graduate, and postgraduate qualifications (levels 4-9), including specialist teacher | kaiako education, both nationally and internationally.

We are committed to achieving high-quality teaching and learning by:

- increasing teachers' | kaiako knowledge of Te Tiriti o Waitangi and Aotearoa New Zealand's dual cultural heritage;
- providing access to online blended delivery of undergraduate, graduate, and postgraduate tertiary education programmes leading to recognised and approved qualifications;
- promoting quality teaching and leadership through ongoing professional learning and development programmes;
- providing a range of unique resources and services to our members.

Priorities for National and Regional Statements

We agree with the proposed priorities listed in the consultation document and are pleased to see Pacific cultural services as well as Pacific bilingual and immersion services included.

We note that services with specific philosophies such as Montessori are not on the priority list so hope that the unique philosophies of such services is taken into consideration at a regional level in the consideration a network management approval.

We are interested in how the proposed scoring will work and how each area will be weighted. We look forward to working with the Ministry as part of the advisory group on this piece of work.

Information required in applications

We agree with the proposed list of information to be provided in applications, and that these are outlined in regulations. We think seeking information on an applicant's affiliation to other licensed service

providers will be helpful for the Secretary's assessment of not only the applicant's capability to run an ECE service, but also their suitability (i.e., are they fit and proper).

Processing timelines for completing assessments and making decisions

While 30 days for each step in the process (Secretary's recommendation and Minister's decision) may seem a long time, we understand the complexity of information to be assessed. We are pleased to see a breakdown of the proposed timeframes.

We ask if the clock will be stopped if submitted documentation does not meet requirements, or if the Ministry has questions. If so, this need to be made clear to applicants.

Official notice of approval

We agree with the proposed information in the notice of approval.

If the application is declined, what information will be provided to an applicant? And will they be able to resubmit a new application in the future?

Processes to assess fit and proper status and financial viability

We agree with the use of a statutory declaration as it matches what is currently used in an EC1 application. We also agree that all governance members of an entity be included in the fit and proper tests.

Applying to amend network management approval

We agree that amendments to network management approvals will be able to be made at any stage up to expiry.

Register of network management approvals and revocations

While we agree that a register of network management approvals is publicly available on the Ministry's website, we question why declined applications will not be listed. Basic information on declined applications could be useful information for a provider looking to set up a service in the same location.

Supplementary Order Paper (SOP 162)

We agree with the changes in the SOP to extend the network management approval period from two to three years, (along with the related extension period).

We note that the SOP will also allow the Minister to set milestones. We ask if milestones would be set on advice from the Secretary? If milestones are to be set, then it is only fair that the applicant consulted beforehand.

Make submission to the Ministry of Education by 2 June 2022.

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