

24 February 2023

Consultation on providing a definition of 'locally-based' for person responsible in licensed home-based education and care services.

We are pleased to provide comment to the Ministry of Education on Providing a definition of 'locally-based' for person responsible in licensed home-based education and care 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.

We agree that the regulations are amended to include a definition of 'locally-based' for persons responsible for licensed home-based education and care services. This will remove the current ambiguity for providers, especially those with homes in more rural / remote locations.

We also agree with the rationale for the change - to ensure that educators and children in home-based education and care services receive appropriate oversight and supervision from a suitably qualified person in a timely manner.

While we think it is sensible to add having a place of business from which they carry out their daily responsibilities, in the same local area as the educator(s). We suggest the wording is further expanded to include 'or work' to remove potential queries.

We agree with including a direct connection between proximity and the ability of persons responsible being able to undertake their regulated duties. This makes it clearer on why being local to the homes is so important.

Adding that the person responsible needs to be contactable strengthens the requirements as it is crucial in health and safety emergencies that the PR can be contacted to support the educator, first over the phone to provide advice and then in person if needed.

Clarifying circumstances where the person responsible needs to attend in person does not prevent them from visiting homes in other situations. We agree that this sets sensible limits on the expectations of not only educators but also of service providers as employers.

If this change means that service providers need to employ more persons responsible, or have their staff responsible for homes in different locations, we ask that a reasonable lead in time is provided. Not only to allow time to recruit staff in the current tight labour market for qualified ECE teachers, but also for persons responsible to build new relationships with educators.

Make submission to earlylearning.regulatoryreview@education.govt.nz by 27 February 2023.

Key contact for Te Rito Maioha Early Childhood New Zealand:

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