

13 October 2021

Consultation on strengthening the person responsible requirement of home-based services.

We are pleased to provide comment to the Ministry of Education on strengthening the person responsible requirement of home-based 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.

General Comments

We agree that the role of person responsible in home-based services needs both strengthening and made more overt. The way the current Regulations have been interpreted has led to a lack of accountability by some home-based providers.

Proposal 1 – Person responsible to hold a Category One or Two practising certificate

We agree with this change. As part of the role is to support educators in implementing Te Whāriki and working with tamariki, this needs someone who has proven experience as an early learning kaiako.

Proposal 2 – Persons responsible to be 'locally based'

We agree the person responsible should be locally based.

We would prefer a 'reasonable travel time measure' be used. This would better support a service provider with homes across a wide rural area.

We suggest that the definition refers to 'driving time' rather than 'travel time' so providers cannot have a person responsible in Auckland, covering a home in Wellington arguing that a one-hour flight fits the 'travel time' definition.

The definition of up to four hours will work for most parts of the country. For very remote places where an educator may support a small rural community, some discretion on the four hours could be allowed by the Education Director.

We don't support using territorial boundaries. They can vary in geographic size, for example, Wellington, Lower Hutt, Upper Hutt and Porirua are all different territorial authorities but travel between each may take only 20 minutes. A home-based provider operating in the Hutt Valley would need multiple persons responsible for homes that are in effect blocks away from each other.

If territorial authorities were to be used, there would need to be an easy way for services to know where their territorial authority boundaries lie.

Proposal 3 – Persons responsible to be limited to a single licence at a time, with an increased maximum licence size

We agree that there needs to be continuity of the person responsible to allow relationships to be built with educators, tamariki and whānau. Educators need to know who their "go-to" person is in any situation. Having a person responsible rostered to only one licence supports this.

A caveat to this is that sometimes it is useful to have a different set of eyes on the home, the tamariki and the education being provided. A different person may pick up on small health and safety details (such as a new fridge that is not secured) that could be overlooked from familiarity. Likewise, a different person may pick up a change in child behaviour or development over time that the visiting teacher in regular contact may miss.

The proposal is for the person responsible to be rostered to those homes for not less than one month. We suggest this could be increased to enhance relationship building as that would only be for two home visits. When a person responsible does change there needs to be a hand-over, potentially with joint visits.

We also agree with increasing the maximum licence size to 100 as this fits better with the 1:50 ratio for the person responsible. Having a licence with over 50 children needing 2 persons responsible gives some flexibility for cover when an educator is away (sick or annual leave). A potential issue could arise where the licence is full with 100 tamariki and both rostered persons responsible are unavailable. How would a provider cover this situation?

Proposal 4 – Persons responsible to support educators' professional development when contacting and visiting them

We strongly agree with the proposal to strengthen the requirement in the regulations for professional development to be provided to educators. It is crucial that educators are supported to provide educational outcomes for tamariki. We question if the person responsible is the best placed person to do this as they would need to be capable of delivering training to another adult which is a specialised skill. If the person responsible is to do this, they will in turn need their own professional development in this skill.

Also, educators need to be exposed to different perspectives and that the professional developed delivered is not too insular.

We agree that the information on what support is provided is made more explicit. Putting these requirements along with documentation requirements in the licensing criteria is the right place for them.

We do not think the additional requirements will detract from anything else a home-based person responsible may do – if anything it will enhance the support provided.

The examples of what might be expected of the home-based person responsible are all good. We would suggest that child protection training is added to this kete. In particular the personal development plans. In addition, we suggest evidence of personal development completed by educators. To do this home-based criterion GMA6 may need to be changed to ensure educators are covered even if they are independent contractors.

Proposal 5 – Persons responsible to guide and observe the curriculum delivery during home visits

We agree with the addition of the person responsible guiding educators' curriculum delivery during home visits and that it is linked to the curriculum framework to be gazetted. We agree that this will provide a greater benefit to tamariki in the educators' care. This should be part of the professional development delivered as part of proposal 4.

Make submission to Earlylearning.Regulatoryreview@education.govt.nz by 13 October 2021.

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