

6 May 2024

Consultation on Revoking the National Statement on the Network of Licensed Early Childhood Services

We are pleased to provide comment to the Ministry of Education on Revoking the National Statement on the Network of Licensed Early Childhood Services (National Statement).

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand (Te Rito Maioha) 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 kaiako education, both nationally and internationally.

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

- increasing 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

Aotearoa New Zealand needs a framework that ensures choice of quality education and safety of tamariki. Having a coherent network of early learning childhood services across the country assists this goal. The intent of the original network planning framework was to ensure that whānau had choice of various services, including different philosophies and cultures, in their communities as well as ensuring that larger providers were not saturating communities. This would also ensure all services operated viably and in the best interests of children and families. The challenges were more about the network approval provisions which proved to be overly complex and costly for the sector and morphed into more than what was consulted on and agreed.

This was not helped when upon implementation, the reach of network management was extended to also include increases to the number of children on existing licences.

Revoking the National Statement

Strategic priorities

While we agree with revoking the National Statement as it is overly burdensome, we believe the strategic priorities still have merit. We wonder if the strategic priorities can be reworked and shared on Education.govt.nz with the information on opening a new service?

Suitability of the applicant (considerations 5c-g)

The National Statement contains detailed information about the suitability of those involved in the governance of proposed service. Will this assessment be moved back to the EC1 licence application assessment? If so, will the requirements for fit and proper revert to what they were (prior to network management) or will they be expanded to cover any of the gazetted requirements? If this were to happen, the sector would need to be consulted.

National Statement Appendices

The National Statement contains information in Appendix B which is useful for potential service providers. We suggest that these tables are updated annually and are relocated to a dedicated section of Education Counts so new providers still have access to this to inform their decision making when entering new communities.

Impact of the proposal

We believe this proposal will return a level of certainty to both current and potential providers.

The proposal will significantly reduce the amount of information to be provided and remove the difficulty of researching supply in the area and of forecasting growth and demand of as part of the application for a licence (or change in licence).

This will make it easier for a small provider who may not have had the ability to research the attributes of the area to be served to the level required by the National Statement to apply for a licence.

However, we still support that providers need to show there is a need for demand in that community.

Make submission to the Ministry of Education by 6 May 2024 to EarlyLearning.RegulatoryReview@education.govt.nz

Key contact for Te Rito Maioha Early Childhood New Zealand:

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