

24 July 2024

Consultation on the Education and Training Amendment Bill (2024) - Revoking network approval for Early Childhood Services

We are pleased to provide comment to the Education and Workforce Select Committee on Revoking network approval for Early Childhood Services.

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 tamariki and whānau. 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 tamariki on existing licences.

Revoking Network Approval

The explanatory note of the Amendment Bill states that network approval is a barrier. While we agree that Network Approval added regulatory burden and direct costs to providers, we still believe that there needs to be a mechanism that ensures that whānau have choice of services, including different philosophies and cultures, while enabling the market to respond to the needs of parents and communities.

We are pleased that this revocation will mean that services will no longer need to apply for network approval to amend a licence. This will mean that services can once again open with a lower licensed number of tamariki and grow over their first year of operation (which is crucial in a teacher shortage).

Additions to the Education and Training Act

Schedule 1 – new Part 6

Section 111 Approval conditions need not be met

If network approval has been refused for a provider, is that refusal now set aside meaning the provider can apply for a licence or change to their licence?

Section 112 Licence no longer subject to certain special conditions

We agree with revoking any special conditions as this will give those granted network planning approval that was subject to conditions certainty that they can apply for a licence once their build is complete.

Section 113 Pending applications for approval

Part (a) states that the Secretary must “treat the application as if it had been withdrawn”.

Does this mean that the Secretary (MOE licensing staff) must disregard any work carried out or decisions made as part of the application prior to this legislation coming into force? Any decisions already made shouldn't be able to be used as part of the assessment of an application for a new licence or for a licence amendment.

Make submission to the Education and Workforce Select Committee by 25 July 2024,

Key contact for Te Rito Maioha Early Childhood New Zealand:

Kathy Wolfe, Chief Executive