

18 October 2019

Person responsible requirements in ECE centres

We are pleased to provide comment to the Ministry of Education as part of its consultation on the person responsible requirements in ECE centres.

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand is a national organisation that promotes high-quality early childhood education (ECE) through initial teacher education, professional development, leadership programmes, advocacy and membership services.

As a membership organisation we represent early childhood education services and the teachers who provide education and care to thousands of infants, toddlers and young children. Our members are drawn from a diverse range of community-based and privately-owned education and care services, home-based services and kindergartens.

Te Rito Maioha is also one of New Zealand's top providers of initial teacher education for ECE teachers and is recognised as a leader in bicultural teacher education. We deliver a suite of qualifications and teacher education and professional development programmes that are of interest to both domestic and international students.

Te Rito Maioha is committed to high-quality early childhood care and education for every New Zealand child. This has been our purpose for 55 years since our formation in 1963, originally as the New Zealand Association of Childcare Centres and later as Te Tari Puna Ora o Aotearoa | NZ Childcare Association.

General comments on the discussion document

We appreciate the government is committed to stimulating teacher supply and alleviating pressures on centres having difficulty recruiting ECE qualified teachers. We agree that training teachers takes time.

While we agree that allowing primary qualified teachers to act as a person responsible would alleviate pressures on centres, in an environment where it's hard for some ECE centres to find teachers, we believe there is a risk that primary teachers will be seen as an easy option for some centres.

We note that the discussion paper has no other options including maintaining the status quo.

Other options could include allowing those who are ECE qualified but not yet registered to act as a person responsible or allowing primary qualified teachers enrolled full time in the one year Graduate Diploma of Teaching (ECE) to be a person responsible during their study.

This could be similar to Regulation 44(3)(a) of the Education (Early Childhood Services) Regulations (the Regulations) that allows 1 staff member who is enrolled in their final year of study to be counted as a qualified teacher.

We are concerned that if this change is made – even as a temporary measure until the full Early Learning Strategic Plan is implemented through additional changes to the regulations, what other allowances might the government make?

What is needed is a programme to increase the number of qualified ECE teachers through attraction to the profession, by supporting those already in the sector to gain a qualification, and incentives in place for others to become qualified.

We believe more time and money needs to be spent on attracting good quality people to become trained ECE teachers. Part of the reason people aren't attracted to the profession is pay and work conditions and part is the public perception of the role, after all a teacher is a teacher is a teacher!

Response to using a primary qualified teacher as a person responsible

We question the logic of allowing a registered primary teacher to be a person responsible when currently a primary teacher does not count towards the 50% of required staff in Schedule 1 of the Regulations.

Given that only 1,221 primary qualified teachers are currently teaching in the ECE sector (4.5% of certificated teachers) we question, how much impact this proposal would in effect have. We believe the need is to focus on the 'bigger activity' items such as getting more people into training, pay parity and working conditions.

Our position has always been that staff in ECE should all hold an ECE qualification. Enabling a primary trained teacher to be a person responsible undermines that intention and potentially quality in ECE provision. If primary teachers can be the person responsible, it's not too much of a leap to say that schools can operate ECE services.

We note with concern that the proposal sets no limit on the number (or proportion) of primary qualified teachers who could be a person responsible in a centre. This could have the unintended consequence that all persons responsible at a centre could be primary qualified and ECE pedagogy and knowledge is lost.

The issue with primary qualified teachers being the person responsible is that it would allow them to lead a service. Primary teachers are not trained to teach in early childhood services. They do not have the pedagogical knowledge required to ensure a curriculum consistent with Te Whāriki. Professional leaders of ECE centres need to have child development knowledge of children under 5 and the accompanying pedagogical and curriculum knowledge.

We believe the proposal undermines the ECE teaching qualification as well as the vital role trained ECE teachers play in children's lives.

Email submission to the Ministry of Education by 20 October 2019: legislation.consultation@education.govt.nz

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