

27 September 2021

Consultation on regulations for home-based educator qualifications.

We are pleased to provide comment to the Ministry of Education on regulations for home-based educator qualifications.

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.

Record keeping

We agree that home-based service providers be required to maintain a list of educators and evidence of their qualification. However, keeping a list for each licence would mean that if educators work across multiple licences, they will need to appear on each list. Would the Ministry expect home-based services to provide this list at specific times, i.e. as part of the EC1 or EC8 application processes, at the probationary or full licence inspection, or "on demand"?



Qualifications for educators

Amended Regulation 3

We agree that the proposed regulation defining ‘home-based service qualification’ captures the types of qualifications home-based educators would need to be considered qualified.

Percentages of qualified educators

Amendment to Regulation 44(1)(a)

The amendment is clear.

New regulations 44(3A)(a-c)

The requirement to calculate the percentage weekly is an appropriate frequency, however using weekly data to assess the proportion of educators in a qualification band is problematic. There are two scenarios that could lead to services dropping bands, both of which are likely:

1. A qualified educator being on leave for a period of more than a week (e.g. during school holidays)
2. All tamariki in that educator’s care being absent (sick or on holiday) – there is currently nothing stating what will happen when tamariki are absent but the educator is available to work.

How will service providers measure this, and how frequently will this be reported to the Ministry? Are Student Management Systems capable of providing this information, and do home-based providers use a SMS in the same way that centre based services do? Or will service providers need to manually submit this information? This could be onerous on larger service providers who have educators who work across multiple licenses.

New regulation 44(3A)(d)

Where a new service provider holds a probationary licence, we agree that educators should be counted towards the required percentage prior to providing educator and care. To not count them would be unfair as they have been employed and will start providing education and care once children are in the license.

New Schedule 1A

The timeframes and percentages in new Schedule are clear.

Quality rate requirements

We think that having two different approaches for standard and quality funding until 80% is reached is workable and provides an incentive for home-based providers to increase the percentage of qualified educators.

Make submission to Earlylearning.Regulatoryreview@education.govt.nz by 27 September 2021.

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