



Early Childhood Council

11 February 2021

John Brooker
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Education Systems Policy
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33 Bowen Street
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Via e-mail to: john.brooker@education.govt.nz

Dear John,

Thank you for your response to my request I voiced at the Early Childhood Advisory Committee (ECAC) meeting at the end of last year. This followed the submission of a proposal to the Minister and the Ministry in 2019, with subsequent reminders. Alas, your reply confirms that the Early Childhood Council's (ECC) proposal has not been accorded the consideration the ECC members think it deserves. The ECC's proposal was based on the views and feedback of early childhood stakeholders who implement policy decisions on a daily basis.

The Ministry of Education's (MoE) change that allowed primary-qualified teachers to function as Person Responsible was driven by a shortage of specifically trained and qualified early childhood teachers. If there were no shortage, the change would most likely not have occurred. We note that all major Early Childhood Education (ECE) sector stakeholders opposed the change. The main issue was that primary-qualified teachers do not possess the specific preschool training and skills to give effect to a leadership or influential role across education and care service delivery. Nevertheless, the Ministry proposed the change. The Minister indicated that he sought to review the change in 2022 as part of the review of the regulations.

The Early Childhood Council's (ECC) proposal by no means advocates for a 'dilution' of teacher responsibility. If the ECE sector did not believe in the value of trained ECE teachers, then stakeholders would not have opposed the inclusion of primary-trained teachers in the person responsible category. We therefore refute the Ministry's point that, "...the intent of the Person Responsible requirement" is diluted by sharing responsibility across the teaching team.

In discussion with the Secretary of Education on 10th November 2020 we agreed that the responsibilities of the Person Responsible could be limited to being shared across the ECE teaching team (note: **not** across all **adults** in a service) in a centre or ECE service. This would make it even more unlikely that a dilution of the intent of the Person Responsible requirement could take place. In fact, it would ensure that all qualified teaching staff assume responsibility at all times. Shared responsibility amongst trained staff in this case does not mean responsibility halved. Indeed, it means that every single trained teacher carries responsibility

for the welfare of the children in their care. This is consistent with their teacher training and the expectations of the Teaching Council.

Finally, we believe the proposed requirement could easily form part of the periodic licensing inspection facilitated by either the Ministry or ERO, to give confidence these requirements are being successfully met.

In addition, the Ministry states that the proposal may give rise to "...teacher-led centres ... operat(ing) for periods of time with no qualified teachers in contact with children". The Ministry also points out that such a situation is at odds with the intent of the ELAP to advance the minimum regulatory staffing requirement of 80% ECE-qualified teachers. We contend that the concern is contradicted by the stated impact of the ELAP. It is extremely unlikely that no qualified teacher would be available in a centre at any one time. And as a reality check, the current practice of nominating one member of the teaching team to the position of Person Responsible for every 50 children attending a service does not mean that all 50 children are supervised by that teacher at any one time. That would be impossible and frankly unsafe when one considers appropriate group sizing. Finally, we challenge the Ministry's fear-based approach on the lack of any evidence to support the concern.

We would, finally, express concern that the Ministry claims it is open to new ideas. We submitted our proposal to the Minister and the Ministry in 2019. Following a number of reminders, we finally receive a written undated response (which is welcomed) on 18th January 2021. There has been no effort by officials at the Ministry to discuss the proposal, their concerns or ideas on how the proposal might proceed. Equally, while various sector meetings have taken place, the Ministry has made no effort to discuss the proposal in a wider forum.

We are obliged to consider the response an effort to shut down an outstanding action point rather than any effort to welcome new ideas and discuss them in any meaningful way, which is, at best, disappointing. Accordingly, we invite the Ministry to reconsider its response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Reynolds', with a large, stylized flourish underneath.

Peter Reynolds
Chief Executive Officer