

Submission on Limited Attendance Early Childhood Education (ECE) Services

1. Introduction

- 1.1. NZEI Te Riu Roa (NZEI) is the professional organisation and industrial union that represents the industrial and professional interests of its 46,000 members. Our members are employed as early childhood and primary teachers, head teachers and supervisors in centres, primary principals, and support staff in the early childhood sector and in schools. We also cover special education staff employed by the Ministry of Education, and advisers employed by colleges of education and universities.
- 1.2. The main objective of NZEI is to advance the cause of education generally while upholding and maintaining the just claims of its members individually and collectively.
- 1.3. NZEI is one of the largest unions and professional bodies in the country and has a long history of playing a positive role in the education sector in particular, and on wider social issues that might affect education, children's well being, or our members.
- 1.4. NZEI's interest in the proposed standards and criteria to the Limited Attendance early childhood education centres stems from its concern about the well-being of children in general, and particularly of those enrolled in early childhood education services.
- 1.5. This submission has been prepared in consultation with the Early Childhood National Caucus, an advisory body to the union on professional and industrial matters, which comprises early childhood teachers from around the country, and in consultation with early childhood representatives on NZEI's national executive.

2. Main Points

- 2.1. NZEI does not support a new category of lesser services with lower standards. NZEI is concerned that this proposal has the potential to undermine advances that have been made in achieving quality education for young children. In particular, NZEI does not support a lower standard of qualifications (in this case no qualifications) for teachers.

- 2.2. NZEI agrees with government policies to encourage exercise and fitness, and supports early childhood services operating in fitness facilities. NZEI notes that some 28 such services currently operate successfully under the current regulations, and that Ministry staff have been working with others to meet regulations or to reorganise, for example as licensed playgroups.
- 2.3. NZEI is concerned that, if a category of lower standard services is introduced, the concept could spread and could be attractive to companies who see an opportunity for commercial gain from offering low quality low cost services.
- 2.4. NZEI is also concerned that new and existing services that might have otherwise chosen to meet the standard regulations may choose the less onerous option in future.
- 2.5. If however, the government is determined to proceed with lower standard facilities, NZEI is prepared to make some suggestions as to how best to proceed under such a regime.

3. Specific Concerns

3.1. Curriculum Standard

NZEI questions how staff in limited attendance services are going to be able to plan for, provide and review an education programme consistent with any gazetted curriculum framework prescribed by the Minister if they have not had any teacher education.

NZEI members consider that, if there is to be a two tier regulatory regime, given the limited hours and the casual nature of attendance in many of these facilities, planning assessing and documenting learning may be one area where the regulations could be less onerous.

NZEI agrees that adults in these services should have to provide positive guidance to children but their ability to do this and anything further in terms of teaching and learning will be hampered by lack of qualifications.

NZEI agrees that adults in these services should have to provide formal and informal feedback to parents on the children's care, but not formal educational feedback.

3.2. Ratios and Services Size Standard

NZEI considers a ratio of 1:4 is inadequate for children under two, and suggests that, for under-tuos, the ratio should be 1:2. One unqualified person is not likely to be capable of looking after four babies at a time. In addition, NZEI considers that there should be a minimum of two people employed at all times that the service operates for safety reasons.

NZEI notes that there are no upper age limits provided for in these services and notes that that could be a problem, with children up to 14 possibly attending.

NZEI considers 16 is too large a group for such a service, particularly noting that one of the purported objections to meeting full regulations is that these services are too small. Twelve would be a more appropriate maximum group size.

3.3. **Premises and Facilities Standard**

NZEI does not have any problem with the premises and facilities standard.

However, NZEI considers that the proposed hours of operation are too long and should be reduced in the interests of children's well-being. We are particularly concerned about encouraging children who might be in another service full-time to then attend a before or after lower quality service at a gym or similar facility. While it might be argued that this is a matter of parental choice, the state has a role to play if it is licensing and regulating these services for operating hours that encourage long days.

Research¹ shows that long hours in poor quality services have a detrimental effect on children's social and emotional development. Adults who are not qualified to understand children in the context of family/whanau dynamics and circumstances may not be well-equipped to cope with children who are tired, hungry, stressed, or having difficulty coping with transitions. Similarly they will not be in a position to have a professional discussion with parents or caregivers about these issues.

NZEI would propose that such services be limited to 9am – 5pm.

3.4. **Health and Safety Practices Standard**

NZEI supports the proposed criteria to meet the Health and Safety standard.

3.5. **Management and Administration Standard**

NZEI supports the proposed criteria to meet the Management and Administration standard

NZEI welcomes the opportunity to make a submission on this proposal.



Frances Nelson
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Te Manukura

13 June 2008

¹ Mitchell, L., Wylie, C., & Carr, M. (2008) *Outcomes of Early Childhood Education: Literature Review*. Wellington: Ministry of Education.