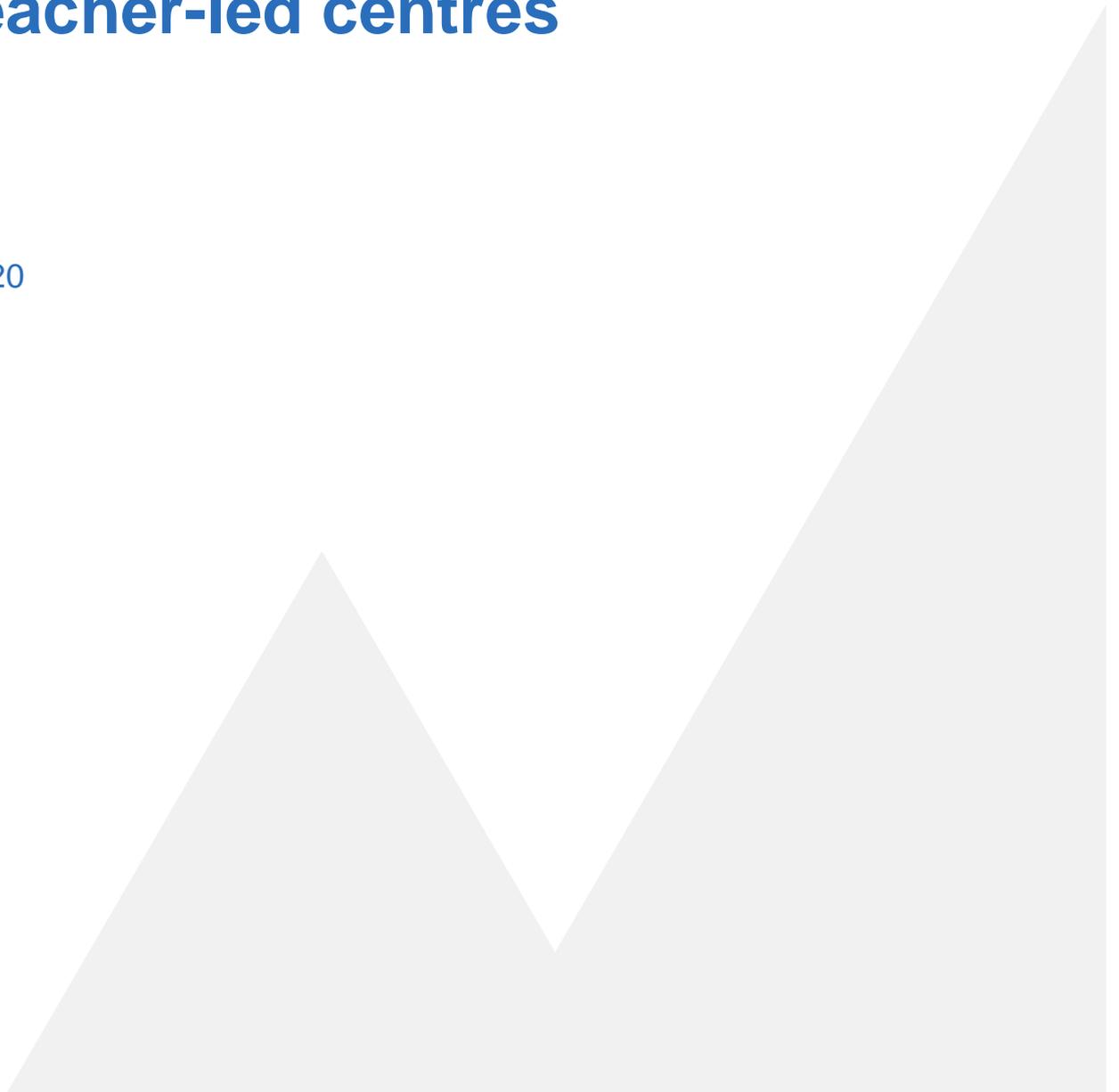




# Consultation report on the person responsible requirements in teacher-led centres

June 2020



# Introduction

**On 23 September 2019, a discussion document was released outlining two proposals which would allow primary qualified teachers to be the person responsible in teacher-led, centre-based services. These proposals were aimed at easing pressure on centres during a period of tight teacher supply.**

The early learning sector was invited to complete an online survey and send written submissions to the Ministry of Education. Consultation closed on 20 October 2019.

The report begins with some background on the groups who engaged on the consultation before outlining the major themes that arose.

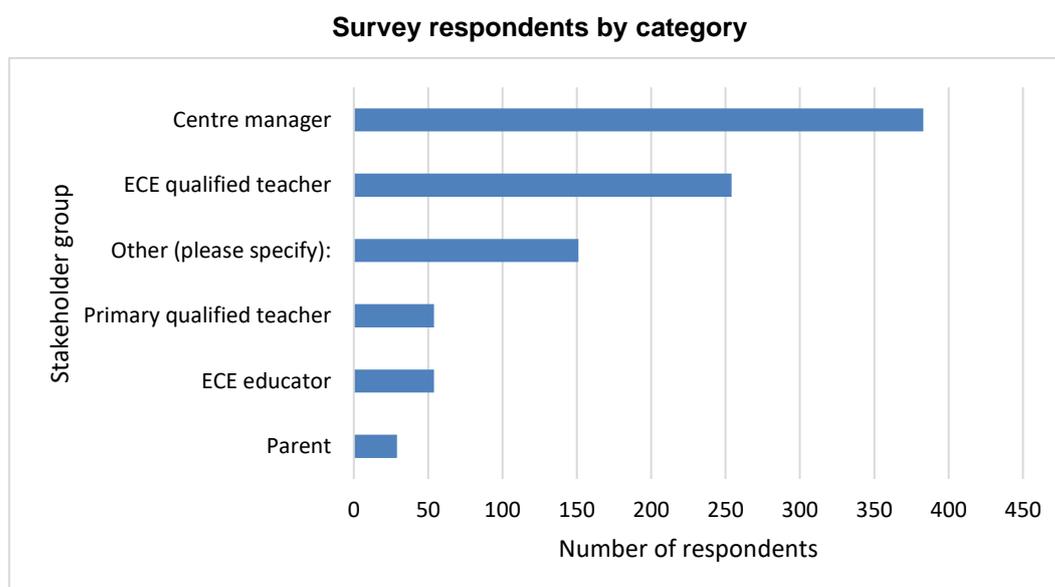
## Submissions

### Online engagement

The Ministry released a short survey, which sought feedback on the two proposals. This gave stakeholders an opportunity to discuss their preferred option and identify other solutions that could help ease pressure on centres. The survey received 802 responses.

### Survey respondents

In the survey, respondents were asked to select the category or categories that best described their connection to the sector. Respondents were largely comprised of centre managers (48%), ECE qualified teachers (32%), primary qualified teachers (7%) and ECE educators (7%).



\*This was a multi-response question, which enabled respondents to choose multiple categories. For example, many respondents noted that they were both a centre manager and an ECE qualified teacher.

## Regions

Regional data was captured for the survey. Nearly half of survey respondents were from major population centres, such as Auckland, Wellington and Christchurch.

Region	Reponses	Percentage
Auckland	241	30%
Waikato	94	12%
Bay of Plenty	86	11%
Wellington	78	10%
Christchurch	65	8%
Canterbury	40	5%
Otago	29	4%
Manawatu	28	4%
Dunedin	20	3%
Northland	18	2%
Southland	18	2%
Hawke's Bay	13	2%
Nelson Bays	11	1%
Timaru - Oamaru	11	1%
Other (please specify)	11	1%
Gisborne	9	1%
Taranaki	8	1%
Marlborough	8	1%
Whanganui	4	0.5%
Not Answered	4	0.5%
Wairarapa	3	0.4%
West Coast	3	0.4%
<b>Total</b>	<b>802</b>	

## Detailed written submissions

The Ministry received 25 written submissions via email. Below is a list of people and organisations who sent written submissions.

### Peak bodies

Early Childhood Council  
New Zealand Kindergartens Incorporated  
NZEI Te Riu Roa  
World Organization for Early Childhood Education  
Te Rito Maioha  
He Whānau Manaaki

### Other

Alcyon Komene  
Devonport Methodist Childcare Centre  
Cathryn Bell  
Chris Matthews  
Danielle and Hayley Farmer  
David Haynes  
Dian Dixon  
Helen Topliss  
Irene Callen  
Joanna Kelly

Jonelle Martin  
Kathy Warne  
Linda Petrenko  
Little Ones Preschool  
Michelle Tod-Bosch  
Nichola Read  
Olivia Hope  
Tiffany Te Moni  
Tracey London

## **Method of analysis**

### **Coding framework for the survey**

Survey comments were analysed using a coding framework that organised survey data by question, response to question, and theme. For example: When should a primary qualified teacher be a person responsible » At all times » Eases demand for ECE qualified teachers and improves roster flexibility.

Respondents often discussed several issues related to a given question. These comments were cross-coded to multiple themes. In this way, respondents with comments that spanned multiple themes were able to have their views captured in all appropriate places.

Themes are referenced in this report if 5% or more of respondents discussed the theme. However, in some cases minor themes were included to enhance the understanding of other themes, or add nuance to the overall narrative of sector views.

### **Written submissions summary**

The 25 written submissions were manually summarised by the Ministry of Education. While the written submissions did not follow a common structure, specific opinions and comments were still organised by question, sentiment (agree / disagree / no opinion) and theme.

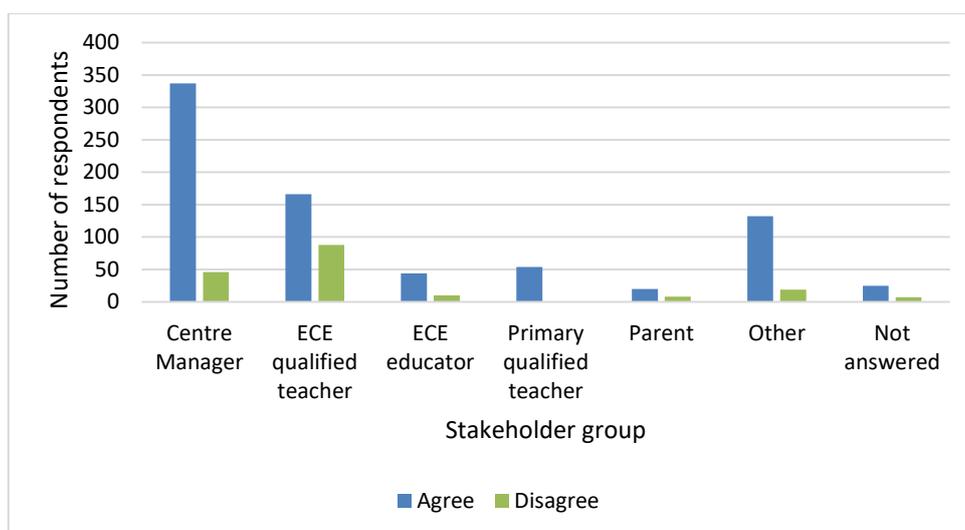
The reported quotes for each question come from both survey responses and written submissions.

# Questions

## Question one: Should a primary qualified teacher be a person responsible in teacher-led centres?

81% of survey respondents (648) agreed that primary qualified teachers should be able to work as a person responsible, while 19% disagreed (153). All major groups, including ECE qualified teachers, were more likely to agree than disagree with the proposal (see graph below). Centre managers and primary qualified teachers overwhelmingly agreed that primary qualified teachers should be able to act in the role. The written submissions were slightly more likely to disagree with the two proposals.

**Should primary qualified teachers be able to act as a person responsible, by stakeholder group (survey only)**



## Question two: When do you think a primary qualified teacher should be able to work as a person responsible?

Of those who answered this survey question (698), 84% agreed that primary qualified teachers should be able to work as a person responsible at all times, rather than for designated periods of the day. 16% answered that primary qualified teachers should only be permitted to work as a person responsible for designated periods.

Written submissions generally supported the intent of the proposals but seldom indicated a preference of the two options.

### All times

Generally, respondents and written submissions agreeing that primary qualified teachers should be able to be a person responsible at all times suggested that these teachers have the skills, experience and pedagogy required to succeed in the role.

*Devonport Methodist Childcare Centre: Primary trained teachers are fully trained as we are, this also includes a considerable growth in the number of primary trained staff that understand and have knowledge in Te Whaariki. I find it incredibly exasperating that these two systems are at odds when in the current situation they do not help us.*

*Other (director): If we trust a primary qualified teacher to work with under 5 year olds in ECE and provide a quality learning curriculum, then we trust them to the do this role at any time of the day, including without supervision.*

*Helen Topliss: The training for emergency and duty of care is much the same for a under five as a 5 year old and in fact the ratios in ECE mean the teacher is usually responsible for fewer children. In an environment where the lines between ECE and primary teaching are becoming ever more blurred the current regulation is no longer a working model to aspire to.*

Others suggested that there is no need to distinguish between ECE and primary qualified teachers for the person responsible role considering they are qualified teachers registered with the Teaching Council of Aotearoa New Zealand and are held to the same codes and standards.

*Centre manager: There is no difference between a primary or ECE registered teacher in terms of the responsibility of a person responsible... Just because they are qualified to teach a different age group, it doesn't mean that they can't be responsible in an early childhood setting.*

*Centre manager, centre owner: Teachers would be inducted under each centres personal policies and philosophy therefore with their training, PV through Teachers Council there is no reason why a Primary trained Teacher could not be considered "responsible" when needed.*

Some respondents outlined that empowering primary qualified teachers to be a person responsible would improve roster flexibility and ease pressure on centres. There was some support for allowing primary qualified teachers to be the person responsible because they are specifically trained to teach larger groups of children.

*Centre manager, ECE qualified teacher: Primary qualified teachers are just as capable as an ECE qualified. This current rule makes rostering very difficult.*

*ECE reliever: Primary school teachers are fully qualified in the education of young children, and capable of educating and safely supervising large groups of children. They are often responsible for 30 or more children. They are suitably trained to be able to do this responsibly for younger children.*

### Designated periods

Survey respondents who preferred the designated period option often noted that it would ease pressure on centres during opening and closing times. This would provide centres with more flexibility when rostering staff, which could be beneficial when ECE qualified teachers are unavailable.

*Centre manager, centre owner: This would allow for staff roster flexibility and as we are a small centre, when a senior staff member is sick then a primary qualified staff member can be in charge until a senior staff member arrives if its the morning shift and this would also give flexibility if a senior staff member who is rostered on at the end of the day but goes home sick.*

Many respondents indicated that primary qualified teachers do not have the pedagogy and experience needed to be the person responsible at all times. Others suggested that changing the person responsible requirement would devalue the ECE teaching qualification.

*ECE qualified teacher, primary qualified teacher: I understand the need for teachers at the moment and as a primary qualified teacher I believed myself capable of being a person responsible. However now as an ECE qualified teacher I value the knowledge that comes with the qualification and don't believe that we should give up the quality of our profession.*

*ECE qualified teacher: Because the ece sector needs to be self sustaining with their ece qualification. Use the primary trained as a last ditch fall back scenario so that we don't de value the ece qualification.*

*Centre manager: Primary teacher as PR on a full time basis undermines the ECE qualification, and I believe, the sector. Knowledge and experience with Te Whariki, and with this specific age group is critical when considering who to employ as PR. PR is often the centre manager/head teacher, responsible for the whole team, and can impact, influence and sometimes drive philosophy of the curriculum offered to children.*

### No or not answered

Respondents disagreeing with the proposals altogether often indicated that primary teachers lack the expertise and pedagogy required to carry out the person responsible duties effectively.

*ECE Educator: 'Primary qualified teachers' do not have the knowledge about infants, toddlers and young children. Some of them will have spent most of their teaching life with 10 and 12 year olds and have no experience with very young children.*

*ECE qualified teacher: I do not think that primary qualified teachers are able to be responsible for the education, care and wellbeing of children aged 0-5. They do not have the necessary knowledge or understanding about health, wellbeing care or education of babies, toddlers and preschool children. I think this proposal endangers the wellbeing of our youngest mokopuna.*

*Other (ECE Regional team management): How could a primary teacher be responsible for the care and education of children they have not studied the relevant curriculum for? I think the only people that would agree for this are the business people. It's a shame for the profession. I am both primary and ECE trained- Primary are not well prepared with our curriculum.*

This sentiment was also largely reflected in written submissions opposing the proposals, particularly from peak bodies. These submissions indicated that either of the proposed changes would compromise the quality of provision and the delivery of *Te Whāriki*.

*He Whānau Manaaki: With already low numbers of qualified teachers being required, to reduce this requirement even further risks diminishing quality in the sector... Allowing primary teachers to fulfil this role undermines the significance and value of ECE specific training.*

*Te Rito Maioha: The issue with primary qualified teachers being the person responsible is that it would allow them to lead a service... They do not have the pedagogical knowledge required to ensure a curriculum consistent with *Te Whāriki*.*

*David Haynes: There is real value in all teachers working in ECE having appropriate specialist teaching qualifications. ECE training is a better predictor of teacher effectiveness than experience or general level of education.*

### **Question three: Do you think different designated time periods would be more appropriate than the 90 minutes at the start and end of the day?**

This question targeted survey respondents who agreed that centres should only be able to use primary qualified teachers during designated periods. However, instead of identifying and discussing the merits of alternative designated time periods, the majority of respondents reiterated their viewpoint from the previous question.

Respondents who discussed alternative times frequently suggested relaxing the person responsible requirements at midday or during the lunch time period to enhance roster flexibility. There was also some support for allowing primary qualified teachers to be a person responsible for other discretionary hours to cover ECE qualified teachers on breaks, and to allow them to be the person responsible during excursions.

Written submissions rarely discussed alternative time periods when primary qualified teachers should be able to act as the person responsible.

*Centre manager: If they were only able to act as responsible teacher for designated periods I believe 90 minutes at the start of day, 90 minutes at the end plus 90 minutes in midday. This allows cover for lunch breaks.*

*Primary qualified teacher, centre trustee: I think designated periods would be appropriate at other times as well as at the start and finish of a day if required. For example if a primary teacher employed at a centre was the only qualified person working in a particular area for a particular day due to staff being sick or away etc as long as the teacher knew the running and expectations of a centre and had an understanding of Early Childhood education.*

*Primary qualified teacher: I feel I am already doing everything same as my colleagues but I am not recognised as person responsible and need to take another qualified staff with me on trips and excursions even though I am very capable of doing it with an unqualified it's just the rule that prevents me from doing it.*

Other suggestions included limiting the designated periods to 30 or 60 minutes at a time, or extending the proposed designated periods to 120 minutes.

## Question four: If a primary qualified teacher was able to act as a person responsible, how would that affect the quality of education and care in centres?

Of the survey respondents who responded to this question (796), 49% indicated that allowing primary qualified teachers to act as a person responsible would improve the quality of education and care. 34% were unsure or did not think that it would make a difference, while 17% believed it would reduce quality.

There was no free text field available for this question. However, many respondents provided reasons for their answer in other free text fields available later in the survey. Two major themes emerged from these comments:

1. The changes would expand the pool of teachers available, giving centres the freedom to pick the best teacher for the person responsible role, regardless of their specific teaching qualification
2. Primary qualified teachers do not have the knowledge and pedagogy required for the person responsible role.

### Expanding the pool of teachers available

Most survey respondents that commented on this question either believed the changes would improve the quality of education and care or were unsure about what its impact would be. However, these respondents often noted that the changes would ease pressure on centres and expand the pool of teachers available to fulfil the person responsible role. As a result, centres would be empowered to use the best person available for the role, regardless of their specific teaching qualification.

*Centre owner/director: Allowing primary teachers to be teacher responsible will greatly expand the pool of teachers that we can choose from when making hires. An expanded pool allows us to choose excellent quality teachers that we cannot currently offer a job.*

*Centre manager/ECE qualified teacher/parent: I strongly believe this would depend on the quality of the teacher, not on whether it is a Primary trained teacher or trained ECE teacher.*

*Other (Manager support and oversight): You could have an ECE trained teacher that was a teacher of minimal standards and a primary teacher who was exceptional and vice versa - passion, heart, dedication, integrity and work ethic are other factors that haven't been taken into account in the above statement so it is hard to make a judgement across a group.*

### Primary qualified teachers do not have the knowledge and pedagogy required for the person responsible role

Both survey respondents and written submissions which suggested that the changes would reduce the quality of education and care indicated that primary teachers lack the knowledge and pedagogy required to lead services effectively. A number of respondents also added that if the change went ahead, there should be extra mandatory training or upskilling of primary qualified teachers.

*ECE qualified teacher: I feel that a person responsible for a group of our most vulnerable humans at their most valuable stages of development should have specifically trained people for that age bracket in charge of their care and education.*

*Other: You need to highlight the significance of the roles of ece teachers in early childhood. There is a great difference in teaching pedagogies and practice. I have seen this first hand transitioning tamariki to kura. Leave it as it is and give mana to the tohu of ece.*

*Linda Petrenko: I have observed Primary teachers bringing their practice into early childhood centres, with templates and work sheets and "marking of work" with a red pen and stating a 3 year old could do better... I have grave concerns for the impact of "primary School" practice/pedagogy on children who are not developmentally ready for structured learning and for the sort of advice Primary trained Teachers might feel appropriate in responding to parents in the journey of parent partnership.*

*World Organization for Early Childhood Education: Primary trained teachers do not have training or experience in interpreting non-verbal (para linguistic) communication and in supporting children's emotional states and expression of feelings. These 'tuning in' skills are essential to the wellbeing and learning of all young children to avoid toxic stress.*

## Question five: Are there any other options you think that we should look at for the person responsible requirements?

Both survey respondents and written submissions frequently suggested the importance of increasing pay and conditions for qualified teachers and increasing funding rates for centres.

*Centre Manager: I think invest more money in being able to provide better ratios and paying teachers their worth so that we can attract more qualified ECE teachers, rather than "robbing Peter to pay Paul".*

*NZEI Te Riu Roa: Continued advocacy for funding to incentivise a 100% qualified ECE workforce would go some way to attracting and retaining qualified and experienced ECE teachers in the profession. This must be achieved urgently through commitments to fix the gap between ECE teachers and their kindergarten, primary and secondary counterparts, along with improved terms and conditions of employment across the sector.*

*Centre manager, ECE qualified teacher: Fix the current problem - people are leaving the profession because of current conditions for ECE (not Kindergarten) - pay and conditions inequities, burn out from high teacher:child ratios, questionable practices for tamariki and kaiako resulting in lower quality, and large group sizes and small environments.*

*Centre manager, ECE qualified teacher: Look at why there's a shortage of ECE teachers, its the work conditions, the pay, the government ratios, the minimum class room and outdoor space requirements, the lack of recognition in the education sector.*

On a similar note, many written submissions and respondents suggested it would be easier to address the teacher shortage by ensuring ECE teachers have pay parity with kindergarten and primary teachers.

*Centre owner: ECE centers should pay salaries to ECE teachers comparable with primary teachers to attract more pupil to join ECE training courses.*

A number of respondents also stated that primary qualified teachers should be allowed to be the person responsible after they have undertaken a short 'upgrade' course covering key areas not ordinarily part of primary initial teacher education.

*Centre manager: I think allowing primary trained to be all the time a person responsible they could complete a short bridging course that just covers aspects of ECE that are different or they are not trained in e.g. Te Whaariki , ECE regulations and licensing criteria.*

*Centre manager/ECE qualified teacher: This entirely depends on the teacher and their own commitment to learning. I do feel there needs to be a better pathway for primary school teachers to become ECE qualified taking into account their full time work in the ECE sector. A bridging course would be excellent to bring them across to understanding and using Te Whariki and play based learning.*

*Other (owner and business manager): A primary qualified Teacher should complete the Te Whariki webinars, read through all Centre policies and procedures, have a current first aid certificate and complete a PD focused on managing difficult behaviors. Perhaps a mentorship commitment from a Professional Leader for 3-6 months.*

There was also support for ensuring the person responsible is registered and certificated with the Teaching Council, which is already a requirement for the person responsible.

*Centre manager: Must be qualified and registered. Must have current first aid cert.*

Many respondents suggested only allowing primary qualified and/or unqualified teachers to be a person responsible after they have spent a minimum amount of time in the sector, such as six to twelve months.

*Centre manager: It would be better if primary qualified teachers have to work at least 1 year to allow them to be person responsible.*

*ECE qualified teacher, primary qualified teacher: I fel it needs a measure of those who hold this degree to have at east been working in an ECE center for at least 2 years cause even though you have study knowledge it is very different to Primary on many levels.*

*Centre manager: Minimum employment period in service where they are needed to be person responsible experience say six months.*

On a similar note, two written submissions suggested assessing and crediting unqualified teachers for their experience in the sector. They indicated that these teachers could either be credited with a Level 5 qualification or some 500 level papers around curriculum and practicum. The same two submissions also outlined that it would be beneficial to make it easier for qualified teachers to regain practising certificates after they have lapsed.

*Linda Petrenko: Assess knowledge and practice of the “wonderful untrained people” working in early childhood centres to facilitate their receiving some credit... e.g. first year 500 level practicum and basic papers around curriculum knowledge.*

*World Organization for Early Childhood Education: Perhaps a system for enabling people who have given long service in EC centres, but who are not qualified (or not fully qualified) to have some form of assessment to ‘grandparent’ them into a level 5 qualification so that they could more easily move on to complete a degree.*

### Alternative options discussed in written submissions

The Early Childhood Council’s submission was premised on the idea that the person responsible requirement is outdated. They suggested amending the Licensing Criteria so that the responsibilities are shared by a centre’s leadership and teaching team. The organisation believes that sharing the responsibilities amongst all staff would help lift the overall responsibility and performance of the teaching team.

The World Organization for Early Childhood Education offered a number of different options to help increase teacher supply:

- Offer bonuses to teachers returning to the profession
- Offer scholarships to teachers who obtain a practising certificate
- Incentivise ECE teachers to work in areas of tight teacher supply, and not require ECE teachers to move from areas of tight supply, such as Auckland, to gain residency
- Offer scholarships to primary qualified teachers to undertake a Graduate Diploma in ECE.

### Question six: If you own or manage a centre, how likely is it that you will use a primary qualified teacher as a person responsible?

This question was targeted at centre managers, although most survey respondents answered. 70% of respondents agreed that they would use a primary qualified teacher as a person responsible. 20% indicated that they would not use a primary qualified teacher as a person responsible, while 10% were unsure.

### Questions seven: Are there any other comments you would like to make?

This question was designed to provide stakeholders with an opportunity to comment further on the proposals. However, survey respondents who commented on this question (306) generally reiterated their answers to previous questions. For example:

- 29% of responses commented on how the proposals would influence the quality of provision
- 20% indicated that the proposals would ease pressure on centres and ECE qualified teachers
- 10% outlined that giving qualified and certificated teachers in centres pay parity with teachers in primary schools would encourage more people to enter the sector.

A few individual written submissions also noted that primary initial teacher education now focuses on human development and *Te Whāriki*. On this basis, these submissions indicated that there is less reason to prevent primary qualified teachers from taking on more responsibility in a service. Similarly, in written submissions, some primary qualified teachers felt disrespected by not being able to be a person responsible role under current settings.

*Cathryn Bell: The programmes I was involved in... has been facilitated by ensuring that all graduating teachers, despite their specialism, is familiar with the philosophy, structure and content of both Te Whāriki and the New Zealand Curriculum.... Primary graduates need to have an understanding of where their ākonga are coming from and the rich investment of the principles, strands and goals of Te Whāriki.*

*Nichola Read: I feel very offended by this rule and have been denied the position of a 2IC at my Centre because of my qualification. You are saying my qualifications are worthless even though I have higher qualifications than my head teacher and up until recently my Centre manager.*

Two written submissions also questioned whether the proposed changes were intended to be a short term solution. Te Rito Maioha added that if the change went ahead, it might potentially signal that other allowances would be made over time to ease pressure on centres, which could undermine the quality of education and care in centres.

*NZEI Te Riu Roa: This measure should only be an interim, rather than a long-term, solution.*

*Te Rito Maioha: 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?*



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He mea **tārai** e mātou te **mātauranga**  
kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**