

20 September 2024

Consultation on proposed 'lift and shift' of Teaching Council functions to the Secretary for Education

We are pleased to provide comment to the proposed move of the functions relating to initial teacher education standard setting and approvals from the Teaching Council of Aotearoa New Zealand to the Secretary for Education.

About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand (Te Rito Maioha) is an Incorporated Society of members committed to high quality early childhood and primary education for every child. Established in 1963, our organisation is an influential leader in shaping today's early childhood sector through advocacy, policy, tertiary education qualifications and professional development programmes.

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 early childhood and primary school undergraduate, graduate, and postgraduate qualifications (levels 4-9), including specialist teacher|kaiako education, both nationally and internationally.

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.

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 and field-based delivery of undergraduate, graduate, and postgraduate tertiary education ECE and primary school programmes leading to recognised and approved qualifications;
- promoting quality teaching and leadership through ongoing professional learning and development programmes; often together with government and agencies;
- providing a range of unique resources and services to our members.
- supporting and advocating for initiatives across agencies that improve outcomes for children and young people.

We always aspire to lift and grow the teaching profession

In terms of this proposal there is no clear value proposition or problem definition to explain what this proposal seeks to address. As such, it is hard to agree that moving core initial teacher education (ITE) functions from the Teaching Council to the Ministry of Education is the appropriate solution.

We support the Government's goal of well-prepared teachers|kaiako who excel in schools, kura, and early learning services. We are committed to working with our sector colleagues to lift the status and the mana of the teaching profession, and to attract, educate, and retain a sustainable workforce. We need to consider the teaching profession and the education of children|tamariki in ECE and schools today, as well as future generations.



To enable this, we encourage the Minister to look at the teaching profession in its totality and not in silos such as this proposal.

Aotearoa New Zealand urgently requires a Teacher Education Workforce Strategy that identifies all objectives, agency and Ministry roles, providers, other partnerships and investment across (not exhaustive):

- Attracting and recruiting people into the profession
- Initial teacher education provision and quality
- Employment of teachers into the profession
- Pay and working conditions conducive to the profession to make it an attractive career option and retain qualified teachers|kaiako
- Teacher|kaiako retention
- Ongoing qualification upskilling and professional learning and development
- Succession planning and leadership.

Our submission therefore provides our responses to the proposal as follows:

We disagree with the proposed shift of initial teacher education standard setting and approval functions from the Teaching Council under the powers of the Secretary of Education

If the quality or delivery of ITE is of concern, or the preparedness of newly qualified teachers|kaiako (there is a difference), we welcome a discussion to better understand the details. This broadbrush approach is potentially damaging where ITE quality and delivery is high and welcome by ECE and the compulsory sector.

We are unaware of whether the Minister has access to all ITE qualification content and delivery models that tertiary providers across Aotearoa New Zealand offer, as the current standards are high. We have the highest entry criteria into ITE in the OECD and approval processes, review and monitoring are of a high standard, thanks to robust NZQA and Teaching Council policies and compliance processes. If the Minister has observed issues with ITE qualifications and/or delivery, surely these can be addressed through provider oversight rather than the blunt approach of dismantling core functions of the Teaching Council?

We believe the Minister has enough powers to change the Teaching Council's mandates, allowing experts within the Teaching Council and the profession to effectively address these. The Teaching Council have the capability and can be further resourced and supported to address a perceived problem. In contrast, there is significant concern that the Ministry of Education lack the capability, ability, and industry confidence to fulfil these functions in a team when significant downsizing is occurring in the Ministry of Education.

Existing monitoring processes could be addressed (once the problem is identified) to strengthen ITE quality or delivery concerns (for instance, the Tertiary Education Commission's provider monitoring, or the Teaching Council's ITE moderation and review). There is also the ability for the Minister to make changes to include Ministry of Education staff in Teaching Council ITE approvals, reviews, and ongoing monitoring.



Has the Minister engaged with a wide range of stakeholders across ECE and the compulsory sector? Many have commended graduates entering their ECE services and classrooms for being well prepared.

It is important to note that the expectation is not that teachers|kaiako graduate from ITE 'ready to teach'. New and beginning teachers obtain a *Tiwhikete Whakaakoranga Tōmua* / *Provisional Practising Certificate* from the Teaching Council, which recognises they have not yet had the opportunity to demonstrate they can independently use and meet the Standards | Ngā Paerewa as they are new to the teaching profession. This is a planned and purposeful two-year induction and mentoring phase. Like other professions, the Teaching Council's registration and certification process support teachers|kaiako to grow into the profession.

We have identified a number of risks associated with this proposal

Increased Ministerial control of ITE sets a dangerous precedent

Moving these functions under the powers of the Secretary for Education actually moves accountability to the Minister of the day, who directs the Ministry of Education. Ministerial control of professional ITE programmes and standards seems a heavy-handed approach to an undefined problem. This would politicise teacher education, which would be challenging to reverse, and could set a precedent for other professions in Aotearoa New Zealand.

Such Ministerial oversight and direction would be inconsistent with other professions in Aotearoa New Zealand. Architects, Lawyers, Psychologists, Social Workers, Nurses, Doctors, and Speech Therapists all have independent professional bodies and are not subject to such Ministerial intervention. These professions, like teaching, are self-regulating. All teachers|kaiako are professionals and deserve their own professional body overseers.

We are unsure why ITE and teaching has been singled out as a profession to sit within its Ministry. This proposal appears to be based on political agenda rather than what is best for the profession or representing good pedagogical practice. Minister Stanford mentioned have more ability or "levers" relating to ITE programmes. Having an understanding of what the Minister is trying to achieve would be helpful for stakeholders to support problem-solving and recommend solutions and improvements where they are deemed requirements.

This change would mean a government-dictated approach on what is taught and how it is taught. The Teaching Council is an independent statutory agency and is not part of the core Crown, which means the profession is less impacted by changes or swings of government, enabling continuity for the sector and for the profession.

The Teaching Council has been impacted by such political changes in the last ten years, changing from the Teachers Council - the Education Council – the Teaching Council by different governments, and restrictions on mandated functions to be more effective. These changes distract from the Council's core focus of supporting and monitoring a competent teaching workforce who are fit to practice.

Aotearoa New Zealand needs a sustainable, consistent education sector and teachers|kaiako need an independent professional body.

By the profession, for the profession

The Teaching Council was established to ensure safe and high-quality leadership, teaching, and learning for children and young people in early childhood, primary, and secondary schooling in English-



medium and Māori-medium settings, and settings of other languages, through raising the status of the profession¹. Its functions enable coherent and robust oversight of the profession.

If the proposal were implemented, teachers|kaiako would not have an independent body relating to setting the standards of ITE, monitoring and reviewing. The Teaching Council is accountable to those in the profession and that independence is necessary and invaluable. The proposed change would weaken teachers'|kaiako voices, and those in and around the profession in general.

Shifting these functions to the Ministry of Education would have a significant impact, not only on our younger children|tamariki but also on their families, communities, and future generations. Such a change would influence the way education policies are implemented, potentially altering ITE, professional standards, and support systems. This could change how teachers|kaiako engage with children|tamariki, placing a greater emphasis on long-term, community-centered outcomes. By focusing on a broader, more integrated approach, this shift could strengthen the connection between education, family, and community well-being, ultimately affecting the development of generations to come.

The Teaching Council and teaching profession would be devalued

If the proposal is implemented, the Teachers Council will only be mandated as the teaching Registration Board and Disciplinary body. ITE will be disjointed, with functions sitting across the Ministry of Education and the Teaching Council. This is not conducive to a well-functioning system and could create more problems.

Standard setting, approval, quality assurance, and monitoring of ITE is currently and intentionally set up to be arms-length from government. ITE is not a political matter.

The Teaching Council is valued by the profession for its advocacy, responsiveness, and ability to be nimble. They represent teachers at a grassroot and community level. They have established good relationships and trust across the sector. As an independent body, accountable to the profession, the Teaching Council allow for good, constructive debates about how things are done.

In contrast, the Ministry of Education is a large, Wellington-centric, government department that would slow down ITE approvals and improvements. There is a worry that ITE would get lost in the 'machine' that is the Ministry of Education, that trust and relationships would be lost, and approval and review timeframes would be long, costly and wasteful.

Potential unintended and negative consequences

- Involving another agency in ITE standard setting and approvals leads to duplication of time and effort and a waste of resources for providers who already work with NZQA/Universities New Zealand and the Teaching Council. Adding the Ministry of Education as another agency responsible for some – but not all – ITE functions will risk confusion of roles and responsibility and will increase compliance and reporting costs.
- As the problem is not well-defined, there is a risk that at face value, lifting and shifting core ITE functions will just move the 'problem' to the Ministry of Education.
- There is a very real risk that ITE providers will cease offering ITE. If the bureaucratic and administrative compliance of approvals, reviews and offering ITE increases and timeframes are extended, providers may opt out, sticking with 'easier' tertiary provision. This would lead to less ITE options for students|taura and less diversity for Aotearoa New Zealand's teaching

¹ s478 of the Education and Training Act 2020.

workforce. We are already experiencing teacher|kaiako supply challenges and this has the potential to exacerbate the shortages in ECE, primary, intermediate and secondary.

- Currently we have the same standards and requirements of ITE across ECE and the compulsory sector. There is a risk that our ITE will become a tiered system across the profession which is not what we should want. A teacher, is a teacher, is a teacher, no matter where they teach across our education system.
- This will also be the potential threat to Aotearoa New Zealand's academic freedom and tertiary provider independence.

The people who will suffer the most is our children|tamariki from 0-18 years of age. These are our citizens and leaders of the future. The government is forgetting that it will be our children|tamariki who will be deeply affected by all these changes.

The Minister already has influence over the Teaching Council

The Education and Training Act 2020 (The Act) already empowers the Minister to:

- appoint six of the 13 Teaching Council members (s475 of The Act). The remaining members are sector representatives, elected by teachers.
- communicate their expectations to the Teaching Council. This could be extended by having Ministry of Education representation on Teaching Council approval panels, so there is further transparency for the Minister and Ministry in the process and decision-making.
- be consulted on proposed Teaching Council amendments to the criteria for teacher registration or standards for qualifications that lead to teacher registration (s479(1) of The Act).
- give written approval for the Teaching Council to:
 - provide leadership to the education profession:
 - enhance the status of education leaders:
 - identify and disseminate best practice in education leadership (s479(2) of The Act).

We support an education system that honours Te Tiriti o Waitangi

The Education and Training Act (2020) seeks to establish and regulate an education system that *honours Te Tiriti o Waitangi and supports Māori-Crown relationships* (s4 of the Act). It is important that our kaiako Māori and our children|tamariki have a voice and are culturally safe in our ECE centres and classrooms.

The Teaching Council have worked alongside iwi, and embedded Mātauranga Māori practices and knowledge across their mahi, ensuring that these foundations are respected and upheld. It is a very real risk that these important gains and commitments, along with the trust and constructive relationships established, will be lost. To undermine both the cultural integrity of the years of work and partnerships that have been nurtured and sustained will potentially stall or be damaged under the bureaucracy of the Ministry.

We support a solution to attract, educate, and retain a sustainable workforce

Finally, we worry the ad-hoc approach to addressing perceived or actual problems will continue to erode the teaching profession. We will not have supply and demand forces, as there will just be no interest in providers offering ITE if it becomes un-wielding to do so and nor interest in a profession



that is not valued as a critical profession who educate our children|tamariki who will be part of our future economy and leaders ensuring the legacy we all leave will benefit generations to come.

We welcome and want to be part of the solution, to address the problems that keep the Minister awake at night and sincerely urge the Minister of Education to leave these functions within the Teaching Council and address her requirements in other ways that supports her vision and Teaching Councils mandated functions.

"Whaia te iti kahurangi, ki te tuohu koe me he maunga teitei"

Pursue that which is precious, and do not be deterred by anything less than a lofty mountain

Submission made to teacher.education@education.govt.nz 20 September 2024.

Key contact for Te Rito Maioha Early Childhood New Zealand: Kathy Wolfe, Chief Executive.

