

18 December 2024

## Consultation on the Policing (police Vetting) Amendment Bill

We are pleased to provide comment on the Policing (Police Vetting) Amendment Bill.

### 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 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.

### Background

Our member services are required to police vet all staff under the Childrens Act. Some vets are carried out by the Teaching Council as part of their teacher registration and certification, and for non-qualified staff, vet them using the police vetting service. ECE services also vet volunteers who provide support to their staff.

In the past have been issues with the time taken to process a vet which has led to delays in employing staff. The removal of the Education Urgent service a few years ago compounded this situation.

In general, we agree with the changes in the Bill and believe they will streamline the process of vetting staff and where needed volunteers.

***Enabling an authorised individual to make a vetting request in relation to themselves (Section 54D)***

Enabling an individual (who is a member of a “specified class of individuals”) to make a vetting request in relation to themselves specifying the agencies that the vet is disclosed to would be very helpful in the ECE sector as here are a number of individuals who may work for multiple ECE services (e.g. relievers, parent volunteers, trades people). This would prevent multiple ECE services making multiple vetting requests.

This will depend on what is included in the list of specified classes to be specified by the police. We would ask that there is consultation on what roles or types of individuals are included on the list.

***Requiring the police vetting service to respond to a request as soon as is reasonably practicable (Section 54I)***

We are concerned with this change as it removes the current 20-working day target for the turnaround of vets. Removing a definitive timeline could make it difficult for ECE services to plan for the employment of non-registered teachers | kaiako, especially at times of the year when in the past the 20-day target has not been met (January/February). This could have an impact on ECE services having the required amount of staff and thereby impacting their funding.

***Requiring the police vetting service to update a vet in respect of a childrens’ worker (Section 54K)***

We agree with this change. We think it is important that as employers of childrens’ workers, ECE services have the most up to date information possible about employees and while employees of ECE services need to be re-vetted every three years this change will ensure a service is informed if a childrens’ worker has been charged or convicted of a specified offence.

***Enabling the police vetting service to provide updates to an agency if requested and if the individual consents (Section 54L)***

While we agree with this change (as it should allow ECE services to have the same level of information about police vetted adults who are not classified as childrens’ workers), we do question what the “certain circumstances” are.

We note that this cannot take place unless the vetting subject consents to the arrangement. We ask when would this consent occur – at the time of the original vet or when an update needed to be provided?

***Cost recovery (Section 79E)***

We note that there is the addition of the ability to differentiate (charges) between the classes of person requesting the police vetting service and that the charge can differ if an “urgent service” is required”. However, this Bill does not mention or define urgent services and who these services are available to.

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Make submission by 19 December 2024.

Key contact for Te Rito Maioha Early Childhood New Zealand:

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