



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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S16.06

Submission to the Education and Science Committee on the Education Legislation Bill 100-1

The National Council of Women of New Zealand, Te Kaunihera Wahine o Aotearoa (NCWNZ) is an umbrella group representing 288 organisations affiliated at either the national level or to one of our 20 branches. In addition to our organisational membership, about 260 women are individual members of branches. NCWNZ's function is to represent and promote the interests of New Zealand women through research, discussion and action. This submission has been prepared by the NCWNZ Education Standing Committee and the Parliamentary Watch Committee.

1. Introduction

- 1.1. Due to the timing of the consultation period, over the Christmas holidays, we were unable to consult with the wider membership of NCWNZ. If the Select Committee wishes to conduct a thorough consultation in the December-January timeframe, then it should consider extending the time period given for consultation.
- 1.2. **Overall, NCWNZ supports the amendments contained in the Bill.** We are pleased to note in the Cabinet Papers supplied with the Bill that there was evidence of gender impact analysis. We would suggest that there are some minor gender implications arising from the Bill in the area of home-based education and care changes that were overlooked, although these were positive implications as the intentions are to make it easier for parents to access quality childcare of their choice. NCWNZ is also very pleased to note that the Bill proposes to introduce gender-neutral language when modernising the scholarships legislation, and wholeheartedly endorses such changes. Language has a large role to play in determining society norms, and as discussed in the NCWNZ white paper on gender equality¹, we need strong leadership if sexism is to be eliminated.
- 1.3. There are several clauses that NCWNZ would like to make specific comments on.

2. Subpart 2, Clause 6 and 7: Definitions of half-day

- 2.1. In the NCWNZ submission on the Education Amendment Bill 77-1², members expressed mixed views on multiple timetabling arrangements: "issues raised included maintaining sufficient numbers for sporting and other activities to be viable if all interested children were not available to participate at

¹ NCWNZ Enabling women's potential – the social, economic and ethical imperative. October 2015.

² NCWNZ submission S13-01, 2013

the same time, and the impact on the wider community especially the arrangement of interschool events, parents' work arrangements, out-of-school care for children and other supervision arrangements, and use of school facilities by community groups." We note that the Regulatory Impact Statement also raises the issue of the impacts on the community of flexible school hours. We also acknowledge that the requirement for community consultation is included to mitigate this impact. This appears reasonable, although we would raise a caution that sometimes consultation merely ensures that the loudest voice is heard. We would suggest that this area would need to be monitored closely by the Ministry of Education to ensure that flexibility is not being 'forced' onto the community.

3. Subpart 7, Clause 21 and 22: Kura hourua partnership schools

- 3.1. NCWNZ members have previously expressed concern³ that kura hourua are not subject to the Ombudsmen Act 1975 and the Official Information Act 1982, and these clauses propose to extend that exception to tertiary institutions acting as sponsors. We would suggest instead that kura hourua be made subject to these Acts, and therefore there would be no need to extend such exceptions to tertiary institutions.

4. Subpart 11, Clause 30 and 31: Early childhood education and care – home-based services

- 4.1. NCWNZ has a long history of advocating for accessible high-quality childcare, and the intention of enabling older and younger children to be cared for in the same home-based setting, if that is what the parents choose, is strongly supported. However we would like to raise two points about the clauses as worded.
- 4.2. One point is that it appears that the adult-child ratios are being raised. The regulatory impact statement considers that the new section 317A needs to be inserted to maintain regulatory control of ratios, however one reading of the clause⁴ suggests that the effect would be to increase the ratios. At best, this clause is confusing and ambiguous.
- 4.3. The second point is that the review of the Education Act currently being undertaken by the Ministry of Education aims to make the Act more focussed on governance issues, and management and operational issues would be contained in other lower level regulations. Ratios for early childhood education and care services are contained within the Education (Early Childhood Services) Regulations 2008, and we would suggest that this is the appropriate place for specifying ratios rather than in the Education Act.

5. Conclusion

- 5.1. In conclusion, NCWNZ supports the intentions of the Bill to enable families to access home-based care for both their older and younger children together, although we have reservations about the wording suggested. We support the proposed gender neutral language in the scholarships legislation. Finally, we have a reservation about the implementation of half day definitions, and a suggestion to

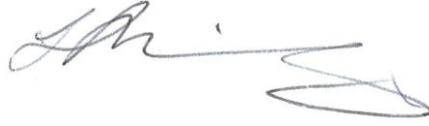
³ NCWNZ submission S13-01, 2013

⁴ Jane Blaikie <http://www.ea.org.nz/the-governments-secret-plan-to-lift-ratios-in-home-based-ece/>

make kura hourua sponsors subject to the Ombudsman Act and the Privacy Act rather than to exempt tertiary education institutions who act as sponsors.

A handwritten signature in black ink, appearing to read 'Rae Duff' in a cursive style.

Rae Duff
National President

A handwritten signature in black ink, appearing to read 'Suzanne Manning' in a cursive style.

Suzanne Manning
Convener, Education Standing Committee