

## Response ID ANON-PD8J-5XRW-C

Submitted to **Consultation on Tranche One of the Early Learning Regulatory Review**  
Submitted on 2021-02-11 13:29:44

### Respondent information

**Q1) What is your ethnicity (select all that apply):**

**Other (please specify) :**

n/a

**Q2) What best describes you:**

Not Answered

**Other (please specify) :**

Public health unit

**Q3) What type of early learning service are you associated with (if any):**

Not Answered

**Other (please specify):**

**Q4) Where do you live:**

Wellington Region

### Proposal 1: Creating a cancellation pathway based on a service's provisional licence history

**Q5) Do you agree that the Secretary should be able to cancel a licence when there is evidence that a service provider is not consistently complying with the regulations?**

Not Answered

**Q6) Do you agree that the regulations should be more explicit in what the Secretary can consider when cancelling a licence because of the service provider's provisional licence history?**

Not Answered

**Q7) Please give examples of what would be appropriate for the Secretary to consider when cancelling a licence:**

**Q7) Please give examples of what would be appropriate for the Secretary to consider when cancelling a licence.:**

**Q8) If you disagree with the Secretary being able to cancel a licence based on a provisional licence history, do you think it would be more appropriate for the Secretary to reclassify the licence as provisional instead?**

Not Answered

**Q9) Please provide any further comments you may have on these proposed changes.**

**Q9) Please provide any further comments you may have on these proposed changes.:**

### Proposal 2: Issuing a provisional licence to carry out an investigation in the event of an incident

**Q10) Do you agree that, following an incident involving a child, the Secretary should have the ability to reclassify a licence as provisional while an investigation takes place?**

Not Answered

**Q11) Do you think that Clause 9(1) makes these changes clear?**

Not Answered

**Q12) Please provide any further comments you may have on these proposed changes.**

**Q12) Please provide any further comments you may have on these proposed changes. :**

### **Proposal 3: Creating written directions for health and safety matters that require immediate attention**

**Q13) Do you agree that this approach to issuing written directions strikes the right balance between requiring a service to immediately address health and safety matters while allowing them to safely remain open?**

Not Answered

**Q14) Do you agree that up to 5 working days is an appropriate length of time for a service to comply with a written direction?**

Not Answered

**Q15) Do you agree that the Secretary should be able to suspend a licence, or reclassify it as provisional, if a service has not complied with the written direction within the specified timeframe?**

Not Answered

**Q16) Please provide any further comments you may have on these proposed changes.**

**Q16) Please provide any further comments you may have on these proposed changes.:**

### **Proposal 4: Clarifying the provisions for licence amendments when the service provider changes**

**Q17) Do you agree that Clause 13(1) would better reflect that service providers have to apply for an amendment before there is a change in the identity of the service provider?**

Not Answered

**Q18) Do you agree that Clause 13(4) would better reflect that the Secretary has the discretion to use appropriate assessments?**

Not Answered

**Q19) Please provide any further comments you may have on these proposed changes.**

**20) Please provide any further comments you may have on these proposed changes.:**

### **Proposal 5: Removing the 21-day minimum notice period for suspensions for change of control**

**Q20) Do you agree that we should remove the 21-day minimum notice period for suspensions for change in control of a service provider without a licence amendment?**

Not Answered

**Q21) If you think this notice period should be reduced instead, what minimum number of days notice period would be more appropriate?**

Not Answered

**Q22) Please provide any further comments you may have on these proposed changes.**

**Q23) Please provide any further comments you may have on these proposed changes.:**

### **Proposal 6: Removing the 21-day minimum notice period for suspensions for not returning an invalid full licence**

**Q23) Do you agree that we should remove the 21-day minimum notice period for suspensions for not returning a full or probationary licence when it is invalid?**

Not Answered

**Q24) If you think this notice period should be reduced instead, what minimum number of days for the notice period would be more appropriate?**

Not Answered

**Q25) Please provide any further comments you may have on these proposed changes.**

**Q26) Please provide any further comments you may have on these proposed changes.:**

### **Proposal 7: Clarifying the information used to assess an application for a probationary licence**

**Q26) Do you agree with how the proposed regulations have been drafted?**

Not Answered

**Q27) If you disagree with the way the proposed regulations have been drafted, how could it be improved?**

**Q28) If you disagree with the way the proposed regulations have been drafted, how could it be improved?:**

**Proposal 8: Increasing the minimum room temperature from 16 degrees to 18 degrees Celsius**

**Q28) Do you agree that the minimum indoor temperature in the licensing criteria should increase to 18 degrees Celsius?**

Strongly Agree

**Q29) Please provide any further comments you may have on this proposed change.**

**Q30) Please provide any further comments you may have on this proposed change.:**

We strongly support the Ministry of Educations proposal to increase early childhood licenced services and certified playgroups indoor room temperature to 18 degrees Celsius. This proposed increase aligns with World Health Organization recommendations who considers 18 degrees Celsius to be a safe and well balance indoor temperature

**Proposal 9: Clarifying that the fee for a new licence is payable upon application and is non-refundable**

**Q30) Do you agree that having the fee payable upon application better meets the purpose of the application fee?**

Not Answered

**Q31) Do you agree that having the fee non-refundable better meets the purpose of the application fee?**

Not Answered

**Proposal 10: Consolidating existing person responsible requirements**

**Q32) Do you agree that the proposed changes to Schedule 1 are clear and easy to follow?**

Not Answered

**Q33) Please provide any further comments you may have on these proposed changes.**

**Q34) Please provide any further comments you may have on these proposed changes.:**

**Proposal 11: Amending the licensing criteria for philosophy statements, self-review and annual planning, requiring services to demonstrate regard for the Statement of National Education and Learning Priorities (NELP)**

**Q34) Do you agree that the proposed changes to the licensing criteria provide services with enough information on how to demonstrate having regard to the National Education and Learning Priorities?**

Not Answered

**Q35) Can you think of any examples of best practice or areas that you would like to see covered in the guidance?**

**Q36) Can you think of any examples of best practice or areas that you would like to see covered in the guidance?:**

**Any additional comments**

**Q36) If you wish to, please provide any additional comments you may have in the space below.**

**Q37) If you wish to, please provide any additional comments you may have in the space below.:**