

11 September 2024

Hon Erica Stanford
Minister of Education

E.Stanford@ministers.govt.nz

Tēnā koe Minister,

## Re: Education and Training Act 2020

I am writing on behalf of the New Zealand Speech-language Therapists' Association (NZSTA) to raise urgent concerns regarding a recent New Zealand Ministry of Education proposal to amend the Education and Training Act 2020. This proposal, if implemented, could have significant and potentially detrimental implications, as it seeks to transfer the responsibility for setting standards, approving, and reviewing initial teacher education (ITE) programmes (sections 479(1) (g-i)) from the Teaching Council of Aotearoa New Zealand to the Secretary for Education. This could potentially compromise the quality and integrity of our education system, a risk we cannot afford to take.

As you are aware, it is standard practice in Aotearoa New Zealand and internationally for independent statutory or self-regulated professional bodies to hold authority over the accreditation and review of professional preparation programmes. This structure is designed to protect the integrity of these programmes, ensuring they are not subject to direct political interference and remain focused on maintaining professional standards.

## Our detailed concerns include:

• The current system, where teacher registration is independent, is of paramount importance. It ensures that decisions related to teacher standards, accreditation, and disciplinary actions are made based on professional expertise rather than political

agendas. This system, upheld by the independent body of the Teaching Council, is insulated from the potential for political changes or pressures that might influence decisions for short-term goals rather than long-term educational quality. Preserving this system is crucial for maintaining the high standards of our education system.

- Independent registration bodies, such as the Teaching Council, are composed of
  professionals who possess a deep understanding of the complexities and nuances of
  teaching. Their expertise uniquely positions them to set standards and ensure
  accountability that aligns with the profession's best practices and ethical
  considerations, which may not always align with government objectives.
- The independence of a registration body enhances public trust in the profession. It ensures that teachers are held to high standards by their peers rather than subject to potentially fluctuating government policies. This fosters confidence that teachers are qualified based on established professional criteria.
- When registered through an independent body, teachers have ownership of their profession and are motivated to uphold high standards, which is crucial for sustaining professional pride and accountability.
- Finally, globally, many professional bodies operate independently to maintain professional standards. Aligning with international norms ensures that New Zealand's teaching profession remains competitive and respected on the world stage.

The proposed changes by the Ministry of Education represent a significant departure from these norms of self-governance. The NZSTA is concerned that this move could set a dangerous precedent for other professional bodies in Aotearoa New Zealand, undermining their independence and potentially compromising the quality of professional education and training.

Ngā mihi nui,

## **Siobhan Molloy**

Executive Director, New Zealand Speech-language Therapists' Association (NZSTA)

E: executivedirector@speechtherapy.org.nz

W: www.speechtherapy.org.nz

CC:

Chair of Education Select Committee

Dr Shane Reti, Minister of Health

Claire Winward, Specialist Service Lead, Ministry of Education

Dr Martin Chadwick, Chief Allied Health Professions Officer, Manatū Hauora - Ministry of Health