

Changes to school board objectives and removing the NELP from legislation



New Zealand Council Of
Christian Social Services

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Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Changes to school board objectives and removal of the statement of National Education & Learning Priorities. NZCCSS advocates for changes to the school board objectives that enhance the accessibility of education, are grounded in a holistic understanding of children's learning and development, uphold te Tiriti o Waitangi and children's rights, and focus support where it is needed. We recommend that the National Education & Learning Priorities be retained.

Our main points are:

- 1. That educational achievement be defined holistically**
- 2. That changes to the school board objectives do not diminish current commitments to te Tiriti o Waitangi**
- 3. That efforts to address non-attendance to be targeted and non-punitive**
- 4. That children's rights and references to rights frameworks be retained within legislation**
- 5. The NELP should be retained to support cohesive resourcing in education**

Taunakitanga | Recommendations

We raise the following points and recommendations for consideration:

1. That educational achievement be defined holistically

NZCCSS supports the current primary objectives contained within section 127 for school boards and queries the implications of these being reprioritised as proposed. We are concerned that prioritising the first objective (being that: *Every student is able to attain their highest possible standard in educational achievement*) over the remaining three objectives will lead to the prioritisation of a particular style of academic instruction over other educational and developmental needs and forms of learning that are beneficial for students. As an example, [Te Kōrero mō ngā Tamariki](#) (NZCCSS, 2024) explores the context of middle childhood (5-12 years) in Aotearoa and shares information and evidence about children's holistic needs as they develop between early childhood and into adolescence. This report highlights the importance of social and emotional learning and play for children's development during this period. We are curious as to how these elements of schooling would be understood within the reprioritised objectives.

We are also concerned that this reprioritisation will result in a diminished focus on giving effect to te Tiriti o Waitangi within schools and further embed inequitable outcomes for tamariki Māori.

We suggest that greater clarification be provided as to how educational achievement is defined, and the practical implications of prioritising this objective over others. We also query how boards will be guided and supported in the implementation of this reprioritisation.

Recommendation 1: We suggest that the objectives of school boards be grounded in a holistic understanding of children’s development and educational needs.

2. That changes to the school board objectives do not diminish current commitments to te Tiriti o Waitangi

NZCCSS is concerned about the potential for changes made to the school board objectives to result in a diminishing of te Tiriti o Waitangi within our education system. We query how a reordering of the te Tiriti-related objectives and the proposed terminology change (local curriculum to teaching and learning programmes) will impact how resource is prioritised in practice and whether this will lessen the focus on the inclusion of te reo, matauranga and place-specific learning within schools. We believe that these elements are vital not only for Māori achievement but for all children growing up in New Zealand to have a grounding in.

Recommendation 2: We advocate for te Tiriti o Waitangi to be upheld within our education system.

3. That efforts to address non-attendance to be targeted and non-punitive

NZCCSS supports a focus on removing barriers to attendance and encouraging regular attendance in Aotearoa. While there may be a role for school boards in the oversight of attendance, we are concerned that the introduction of this objective, and other new initiatives such as the Stepped Attendance Response (STAR) system will increase school administration, direct energy into universal rather than targeted intervention and drive punitive approaches to non-attendance.

Given that justified absences remain the main reason for non-attendance we are concerned that the government focus on responding to all absences under the STAR system will result in additional resource being directed into communicating with parents whose children are absent for valid reasons such as illness. Attendance data indicate that over the past two years, children are present for an average of 85.5% per term of school time and the average percentage of time attributed to non-justified attendance sits at 6.1% per term (of which an average of 1.05% of absences per term are for unknown reasons and may in fact be justified) (Ministry of Education, 2024).

Underlying the current narrative around attendance is a failure to acknowledge that our society has a new normal when it comes to student illness because of the pandemic. Guidelines from the Ministry of Health do little to shift this and continue to recommend an approach to staying home when sick that can easily mean children and young people fall into the Worrying absence category in the STAR system. Requiring schools to send formal notifications to parents in this situation creates additional administration that is unlikely to result in changed behaviour, nor is changed behaviour desired where absences are justified (e.g. sending sick children to school). It also implies a punitive measure even where absences are justified. The result is less resource available to direct to other aspects of school administration, for very little benefit.

We are also concerned that any additional focus around attendance be at a level that is reasonable for schools or board to undertake and that attendance support services be resourced sufficiently to provide the support to whānau that is needed where non-attendance is an issue.

Recommendation 3: We suggest that any attendance-related obligations on school boards and administration are focused on supporting students most at risk of non-attendance and are not punitive in nature.

4. That children's rights and references to rights frameworks be retained within the legislation

NZCCSS opposes the removal of the objective that requires school boards to give effect to relevant student rights set out in the Education & Training Act 2020, the NZ Bill of Rights Act 1990 and the Human Rights Act 1993. We see no tangible benefit to children from the removal of this reference and are concerned that doing so will diminish the visibility of children's rights, and these rights frameworks, within legislation. Reduced visibility of these rights within Section 127 may lead to less awareness among school boards of children's rights, their obligations in relation to these rights, and subsequently less consideration of children's rights in strategic planning, policies and resourcing developed by school boards. This in turn reduces reporting and accountability for how boards are ensuring children's rights are upheld within schools and places of learning across Aotearoa.

Inclusion of this objective is important because it affirms the rights to education and freedom from discrimination that are enshrined in these Acts and board responsibilities in ensuring the safety of children at places of learning. It is a key component of the government's response to the issue of discrimination in New Zealand and the impacts this has been shown to have on children's attendance and achievement at school.

The failure of Aotearoa New Zealand's education system to create policies and practices that embrace and empower Māori perspectives, language and values has perpetuated a cycle of Māori disadvantage, discrimination and marginalisation on repeat since colonisation (He Whakaaraara, 2024).

We have heard much recently of how poorly New Zealand's educational and attendance outcomes compare internationally, but little of the fact that this is also true when it comes to educational inequities and bullying within our schools. We cannot expect to see an increase in educational achievement and attendance in isolation of a focus on the accessibility of education and student wellbeing (Education Review Office, 2019).

Rights frameworks such as those contained in this objective provide a lever for parents and students where discrimination may be occurring. This could be in the case of students being denied enrolment at a school, not being able to access education to the same extent as other children, or not being able to access education that is suitable for their needs. We are concerned that removal of references to specific rights frameworks will weaken the ability for advocacy in such situations.

In addition to retaining this objective we suggest that children's rights under the United Nations Convention on the Rights of the Child, such as those contained in Articles 28 and 29, be included to this objective and in relevant New Zealand legislation such as the Education & Training Act 2020, as recommended by the United Nations in its recent review of New Zealand's implementation of the Convention (United Nations, 2023). Embedding children's rights in legislation is critical if we are to see greater enforceability of these rights and the subsequent benefits of advancements in children's rights in Aotearoa.

We also observe inconsistency in comparing the proposed approaches around attendance and children's rights. In the case of attendance, the proposal is to introduce a new objective to give greater visibility to an obligation that currently exists in the Act (under section 36(2)). In contrast, in the case of children's rights, the proposed approach is to diminish the visibility of this objective due to the obligations it contains being included elsewhere in the Act. Increasing focus on attendance

while reducing focus on children's rights appears illogical given that children's rights are foundational to ensuring education is accessible.

Recommendation 4: We strongly urge the government to retain this objective and strengthen references to children's rights within relevant legislation.

5. The National Education & Learning Priorities (NELPs) should be retained

NZCCSS advocates for retention of the NELPs as they provide useful guidance to schools/education providers. The NELPs bring greater clarity to the government's policy focus than the legislation or curriculum can. As well as bringing clarity, the NELPs provide accountability in relation to both schools' and government performance and investment in education policy.

Recommendation 5: We recommend that the NELPs be retained to support cohesive resourcing in education.

Tohutoro kua tohua | References

Education Review Office (2019). *Missing Out: Why aren't our children going to school?*
<https://evidence.ero.govt.nz/media/2hxp1qi5/missing-out-why-arent-our-children-going-to-school.pdf>

He Whakaaraara (2024). *He Whakaaraara Tōkeke Realising Education Equity for Whānau Māori.*
<https://www.hewhakaaraara.nz/>

Ministry of Education (2024). *Regular attendance data 2011-2024.*
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NZCCSS. (2024). *Te Kōrero mō ngā Tamariki.* https://nzccss.org.nz/wp-content/uploads/2024/06/NZCCSS_Te-Korero-mo-nga-Tamariki_May-2024.pdf

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Ko wai tātou | Who we are

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.

Through this membership, NZCCSS represents over 230 organisations providing a range of social support services across Aotearoa. We believe in working to achieve a just and compassionate society for all, through our commitment to our faith and Te Tiriti o Waitangi. Further details on NZCCSS can be found on our website www.nzccss.org.nz.

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