

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Submission on Early Learning Regulatory Review – Tranche One

To: Ministry of Education
PO Box 1666
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Submitter: Canterbury District Health Board

Attn: Kirsty Peel
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C/- Canterbury District Health Board
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SUBMISSION ON EARLY LEARNING REGULATIONS – TRANCHE ONE

Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.

Details of submission

3. We welcome the opportunity to comment on Tranche One of the Early Learning Regulatory Review.
4. Health is influenced by a wide range of factors beyond the health sector. Health services manage disease and trauma, and are an important determinant of health outcomes; however, health creation and wellbeing (overall quality of life) is influenced by the conditions in which people are born, grow, live, work and age. These environmental, social and behavioural factors are often referred to as the 'social determinants of health'¹. The most effective way to maximise people's wellbeing is to take these factors into account as early as possible during decision making and strategy development.

General Comments

5. The Canterbury DHB believes it is essential that early childhood care and education settings are of the highest quality to minimise the potential for harm to children and staff. This is particularly the case as more New Zealand children are attending early childhood care and education settings, for more hours and from younger ages.
6. The Canterbury DHB supports the proposed changes in Tranche One to the regulatory framework that contribute to the health, wellbeing and safety of children

¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

and staff at early childhood care and education settings. It is important the health and safety concerns can be addressed quickly and are not allowed to perpetuate.

7. In particular, Canterbury DHB supports proposal 8 to increase the minimum indoor temperature to 18 degrees as this aligns with World Health Organisation guidance about minimum indoor temperatures in residential settings.
8. The Canterbury DHB notes that these proposed changes won't mitigate the increasing damage to child and staff wellbeing from working conditions, services being under-staffed, and under-funded, with staff shortages and an oversupply of centres in many cities including Christchurch.
9. The Canterbury DHB is disappointed that other health promoting regulation changes have not been introduced in Tranche One. In particular, as mentioned in our previous submission on the Draft Strategic Plan, the Canterbury DHB strongly supports:
 - A reduction of the adult-child ratio for two years olds from 1:10 to 1:5. The CDHB recommends that the adult-child ratio for children under 2 is further reduced to 1:3; and that the adult-child ratio for children aged 3-6 years is reduced from 1:10 to 1:8, in line with regulated ratios in similar OECD countries.
 - Regulated maximum group sizes being introduced in line with international research of childcare quality.
10. The Canterbury DHB also suggests that attention needs to be paid to making regulatory changes to other health-related issues such as noise levels (both internal within the centre and externally from busy roads), air pollution from situating centres on busy roads and/or in industrial or commercial areas, ensuring ventilation and ergonomics are prioritised to support teacher wellbeing, reduce infection (COVID and other communicable diseases) and minimise injuries to kaiako and increasing the minimum standard of space per child.

Conclusion

11. The CDHB does not wish to be heard in support of this submission.

12. Thank you for the opportunity to submit on Tranche One of the Early Learning Regulatory Review.

Person making the submission



Evon Currie

Date: 9/02/2021

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