

Submission from the Children's Commissioner: *He taonga te tamaiti : Every child a taonga* - Strategic Plan for Early Learning 2019-2029



The Children's Commissioner represents **1.1 million** people in Aotearoa New Zealand under the age of 18, who make up 23 per cent of the total population.

We advocate for their interests, ensure their rights are upheld, and help them have a say on issues that affect them.

KEEPING CHILDREN AT THE CENTRE OF EARLY LEARNING

- 1 I begin our submission on *He taonga te tamaiti: Every child a taonga – the Strategic Plan for Early Learning 2019-2029* with a quote from a young child my staff met at an early learning service in 2017:

"I love playing on the monkey bars, puzzles, reading, drawing circles, reading books, drawing, drawing houses; I love everything, I love it all; I am going to smile all my days and all my weeks."
(Child in early childhood education, New Zealand European)¹

I share this quote to draw attention to the young children that the strategic plan is aiming to support. I ask that those reading our submission keep these young children in the forefront of their minds, because the success of the final strategic plan will hang on how well it supports children's development and early learning.

- 2 Firstly, we congratulate the Ministerial Advisory Group and the Minister of Education for the ambition and scale of this draft Strategic Plan for Early Learning 2019-2029. The goals are largely in alignment with both research and evidence and the needs of children, families and whānau. Our submission is informed by my Office's analysis of the plan which has been undertaken by putting the child at the centre, surrounded by their family, whānau, and community. The Office has also assessed the draft plan in terms of its impacts on different groups of children, adherence to the United Nations Convention on the Rights of the Child (the Children's Convention) and the principles of the Treaty of Waitangi.
- 3 We strongly support many of the recommendations, particularly those around lifting the regulated requirements in areas related to quality provision. In our view, the current minimum standard of care (embodied in the regulations as a whole) is below the ideal, whether looked at in terms of research and evidence about child development, what children say, or what most people would consider appropriate for our children. In particular, the proposed change of regulated ratio of adults to children is welcomed because the current situation is unacceptable; the need for better ways of supporting children and communities with higher needs is pressing; and the development of a new funding model for Te Kōhanga Reo that implements the findings of the Waitangi Tribunal [Wai 2336: Matua Rautia] is overdue.
- 4 Despite these strengths, this draft plan falls short in some important ways. The final plan will need to provide better direction for a sector that is currently failing Māori, so we suggest much more consideration of the needs and rights of tamariki and whānau

¹ Office of the Children's Commissioner (2018). *Education Matters to Me: Key Insights*. Office of the Children's Commissioner: Wellington

Māori be included. The draft plan is also silent on the role of parents, families and whānau in an early learning system, despite the substantial bodies of knowledge that speak to their importance in creating learning environments for young children.

- 5 This submission discusses issues and makes recommendations in areas that need more work to ensure that all children's rights, needs, and interests are placed front and centre. These issues are complex but, in our view, resolving each of them is essential to the success of the final ten year strategic plan.

Summary of Recommendations

Rec 1: Greater focus be given to the rights, needs and aspirations of tamariki and whānau Māori and how the early learning system can reduce systemic disparities between Māori and non-Māori.

Rec 2: Discussions and decisions about the planning and ownership of the early learning sector, be conducted in partnership (not just consultation) with Māori.

Rec 3: The final draft strategic plan focus on the early learning system *as a system* rather than a collection of regulated services, by providing explicit consideration of ways the early learning system can support parents, families and whānau to promote children's early learning.

Rec 4: The final strategic plan be linked explicitly to the Disability and Learning Support Action Plan through common goals and recommendations.

Rec 5: The final strategic plan elevate earlier identification of children's learning needs to the level of a sub-goal.

Rec 6: The characteristics, enablers, and requirements of a mechanism to promote better quality relationships in early learning settings be more thoroughly investigated.

Rec 7: The proposed co-construction of progress tools include children's and parents' voices.

Rec 8: The proposed progress tools be developed in consultation with the Ministry of Health (particularly officials working on the review of the Well Child Tamariki Ora programme) and health professionals who work with young children.

Rec 9: The final strategic plan be underpinned by the United Nations Convention on the Rights of the Child and a child impact assessment conducted to ensure children's rights are being upheld, impacts on children are well understood, children have had their voices heard, and there are no unintended consequences.

Rec 10: The final strategic plan be explicitly linked with United Nations Sustainable Development Goal 4, target 4.2 which aims by 2030 to, *"ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education."*

WE SUPPORT PROPOSED ACTIONS TO ENSURE CHILDREN EXPERIENCE HIGH-QUALITY EARLY LEARNING SETTINGS

- 6 There are many good ideas contained in the draft plan, which, taken together, will significantly raise the minimum standards children experience in formal early learning services. We comment on our particular areas of interest below.

Comment on Goal 1: Raising quality for children

- 7 We support the regulation of new adult to child ratios, as the current ratios are too high (especially for infants and toddlers) and create barriers to children experiencing high quality relationships. The current ratios also place an unfair requirement for the adults working within them. Reducing ratios will enable teachers to do their jobs more efficiently, ensuring that a safe environment is consistently maintained for the infants and toddlers in their care.
- 8 We also support the proposal that further advice be developed on group size and the design of physical environments. The physical environment of early learning settings has an impact on children's development and learning. Ensuring that facilities have sufficient physical spaces and that group sizes do not overload children emotionally or physically are important factors in whether we will be successful in the overall intention of raising minimum regulated standards to provide a better learning environment.

Comment on Goal 2: Every child is empowered through timely access to the resources they need to thrive

- 9 Ensuring that funding supports those who need it is an integral part of improving the inclusiveness of the education system overall. In the early learning system Equity Funding is an important tool supporting all our children to access high quality services, including children in poverty or financial hardship and those with higher learning needs that require additional supports. However, we acknowledge that funding is only one tool in a kete of solutions to this issue, so we support the goal to expand the number of early learning services that facilitate wrap-around social services to support children and their whānau. This approach is effective in helping children and whānau access the social services they need, in a familiar environment where they feel supported.

Comment on Goal 3: Investment in our workforce supports excellence in teaching and learning

- 10 Strengthening initial teacher education is an integral part of the quality improvement approach set out in the strategy. Intentional teaching is one the most direct influences on children's formal learning. We suggest that the amount of teacher education on topics such as child and community development, behaviour management, and infant mental health could be enhanced. Related, we see the intention to improve professional learning and development as an important complement that recognises the on-going nature of professional learning and therefore must be formally supported in an on-going way.

Comment on Goal 4: Planning ensures that provision is valued, sufficient and diverse

- 11 The Kōhanga Reo movement has ensured that Māori language; worldview and culture have been maintained and strengthened over recent decades. The development of a new funding model for Te Kōhanga Reo is belated; however its inclusion in this draft plan is a useful step towards implementation of the findings of WAI 2336. We believe that co-designing an appropriate funding model with Te Kōhanga Reo National Trust represents an important step towards an early learning sector that recognises and meets Māori needs and rights.
- 12 In general, we support the desire to ensure that the early learning sector is staffed with appropriately-skilled individuals through incentivising for 100% degree-qualified staff and regulating for 80%. We note, however, that implementation of this goal will need considerable nuance – for example, to ensure that adults with other important skills (such as native language speakers) and qualifications are not excluded from the staffing funding formulae for early learning services. We specifically mention the importance of language speakers because they often encompass knowledge of cultural practices, and culturally relevant teaching, learning, and relating – helping children who speak other languages to feel a sense of belonging. These factors are essential for the learning and development of Māori and Pasifika children who are confident, and who are confident learners and participants in both te ao Māori and te ao Pākehā.

WE BELIEVE THAT SOME AREAS OF THE PLAN REQUIRE ADDITIONAL CONSIDERATION

- 13 Our foregoing comments demonstrate our commitment to the lifting of regulated standards that form the heart of the strategic plan. However, there are some areas that are not touched on in the plan, or are touched on in insufficient depth, understanding, detail or complexity.

Lack of focus on tamariki and whānau Māori

- 14 The draft strategic plan requires more focus on the rights, needs and aspirations of tamariki and whānau Māori as a distinct population group. The education system has failed Māori for decades and continues to fail. This is true at all levels, including early childhood. For example, in 2010 the Education Review Office (ERO) reported that 60% of early learning services in its evaluation had no focus on realising Māori children's potential to become confident, or to become confident learners, or were only just beginning to focus on this². In 2012, ERO found that fewer than a quarter of the services it evaluated had a high level of understanding of Māori children's culture, language and identity and only one in ten services had a high level of partnership with whānau Māori³.
- 15 Any child-focused strategic direction must be explicit about the need to address disparities between groups of children, both in terms of how they present within the early learning sector, and how they impact educational achievement and the education sector more broadly. This consideration must go beyond removing barriers to participation (though this is important) and address the quality and fit of the services

² Education Review Office (2010). *Success for Māori Children in Early Childhood Education*

³ Education Review Office (2012). *Partnership with Whānau Māori in Early Childhood Services*

and supports that are available to all children in the education system. This exercise should be done for all groups of children, starting with Māori.

- 16 We note that the Reference Group that supported the Ministerial Advisory Group was effectively a sector reference group. For the next stage of development of the plan, either this group should be supplemented with more significant representation of Māori organisations, leadership groups and/or iwi, or a separate Māori Reference Group should be established.

Recommendation 1: Greater focus be given to the rights, needs and aspirations of tamariki and whānau Māori and how the early learning system can reduce systemic disparities between Māori and non-Māori.

More engagement with Māori is required in discussions of increased government planning of the early learning sector

- 17 Goal Four proposes a significantly increased role for Government in planning and managing the early learning sector. The plan argues that network planning and management would be a good way to promote sufficient, diverse, provision that is better connected to community needs, and to schools. We note working with iwi at the local level is intended. These are all laudable aspirations that we support in principle. However, the detailed design work in this area will be important to ensure these aspirations are met without adverse consequences to community self-determination and development.
- 18 The use of the term “network planning” suggests that the outcome envisaged is a managed network similar to the schooling network. This would be a major change to the foundations of the early learning system. We suggest that a case needs to be made for such a network that specifies why this is necessary to improve either children’s experiences or outcomes.
- 19 There are also potential Treaty implications to the discussion contained in this section of the plan that appear not to have been identified. The sector is presently privately-owned but State-regulated and funded. This draft proposal will tilt the power balance between private interests and the State further in favour of the State. While we understand that this proposal is made with the best intentions for quality, diversity, and supply, it will inevitably increase the role and power of the Crown in the lives of all New Zealand children and their families, including tamariki and whānau Māori. This means that the Treaty principles of partnership, participation and protection come into play in the way the work towards the final plan is established and conducted. Given that the early learning system is not currently meeting the needs of whānau Māori in appropriate, equitable ways, and this proposal is intended to remedy that situation, we recommend that these recommendations be reconsidered in consultation with Māori. We further recommend that any changes to the foundations of the sector that may arise from these discussions be implemented only in partnership with Māori.
- 20 We recommend this work with Māori should revisit the section of the plan on The Treaty of Waitangi to better understand the role the Treaty plays or should play in the early learning sector. Page 11 on the role of the Treaty positions the role of early learning services in Treaty implementation as to “provid[e] children with culturally responsible environments in which there are equitable opportunities to learn”. This significantly understates the responsibilities of the early learning sector to Māori, and

indeed to all New Zealanders as members of a Treaty partnership. A key role of the education system is, in our opinion, to reduce disparities between Māori and non-Māori. This is as true for the early learning sector as for the schooling or tertiary sector. This area requires explicit attention, which the draft plan currently fails to provide.

Recommendation 2: Discussions and decisions about the planning and ownership of the early learning sector be conducted in partnership (not just consultation) with Māori.

The role of parents, families and whānau requires additional attention in order to support the plan's focus on an early learning system

"I want my boy growing up happy, a roof over his head, food on the table and clothes on his back. Setting goals and achieving them". (Student in teen parent unit, Māori⁴)

- 21 The Minister's foreword states that a "high quality early learning system" is part of the Government's vision for a high quality public education system. However the bulk of the plan discusses early learning services: their regulation, funding, training of teachers and other associated Government controls. A system is greater than the sum of a range of services, and includes other actors and levers working towards a common goal or outcome. Using this systemic lens to briefly review the literature on early learning and development makes it clear that parents, families and whānau are important parts of the early learning system as the most important providers of care and education to their children. As a Guardian of the Education Conversation, I have heard repeatedly the desire of families, whānau and communities to be involved in their children's learning, and their belief that their contribution is often unseen or undervalued. A key function of an early learning *system* that aims to promote early learning must therefore be to support parents and whānau in this role.
- 22 Parents', families' and whānau characteristics and behaviours, along with the nature of the home environment in the early years, have a significant impact on young children's current and future learning. For example, the OECD's PISA study has found that children who were read aloud to at age five are better readers at age 15. This effect is particularly strong in New Zealand where results showed a half-year improvement in the level of reading, after accounting for socio-economic effects⁵.
- 23 Providing informal home learning activities such as reading, telling stories and singing songs, are parenting behaviours that all children gain at least some long-term benefit from, regardless of their parents' income or education levels. This evidence positions parents' behaviours in the early years as a strong lever on educational attainment that we believe should be much more vigorously promoted. This lever is more appealing because it relates to parents' behaviours, rather than their characteristics such as their age, qualifications or wealth. Given parents' desire for their children to have, and be, the best they can, we believe the education system should promote education-focussed parental behaviours alongside the major focus on children and young people's learning behaviours.
- 24 This is not to say that formal early learning services are not required, as clearly they are. We are convinced by the large bodies of international and local evidence that show

⁴ Office of the Children's Commissioner (2018). *Education Matters to Me: Progress and Achievement*. Office of the Children's Commissioner: Wellington Education Matters to me: progress and achievement.

⁵ OECD (2012), *Let's Read Them a Story! The Parent Factor in Education*, PISA, OECD Publishing. <http://dx.doi.org/10.1787/9789264176232-en>

quality early childhood education can significantly benefit all children. Rather, our view is that an early learning *system* should focus beyond *services* and consider other key actors in children's environments, especially parents and whānau, who create the environments within which young children learn and develop. This is a shift from focussing on *educating* to focussing on *learning and developing*. The main study to consider both the effects of the home and of formal early learning services is the UK's Effective Provision of Pre-School Education (EPPE) project. The project has most recently reported that age 16 examination success was related both to a positive home learning environment in the early years and to participation in a quality early learning service for more than one year. Of these two broad variables, the home learning environment was the slightly stronger influence⁶. This study measured the home learning environment and other family-related influences such as parental qualifications separately, so we can be confident that this finding related to what parents did, not who they were.

- 25 Both home environments and formal learning settings are important but for most children, the time spent in them is not equivalent. The draft plan itself states that the majority (55%) of children attend early learning services for 20 hours per week or fewer. They are therefore with parents, or other family, whānau or community members, for a significantly greater proportion of their lives. In addition, most children have a teacher for only one or two years, whereas their parents and families are consistent influences across childhood and adolescence.
- 26 Early learning services therefore play an important role in supporting parents to positively engage in their children's learning and development, both at home and in the formal education system, in ways that may have long-term impacts on all family and whānau members. Doing so would likely not only improve children's learning, development and wellbeing, but also improve the value of the current spend on both early learning and schooling.
- 27 The plan's vision is "New Zealand's early learning system enables every child to enjoy a good life, learn and thrive in high quality settings that support their identity, language and culture and are valued by parents and whānau". We see the focus on early learning *settings* to be somewhat inconsistent with the plan's stated focus on an early learning *system*, and recommend that this area be further developed in the work towards the final strategic plan.
- 28 There are numerous ways in which parents and whānau could be supported as key elements of the early learning system, ranging from light-touch support for innovations that could be implemented within current funding and regulatory settings, to new obligations and approaches that would require careful thought and additional resourcing. For example, early learning services or the Government could provide more advice and support about ways to create home environments that are richer in oral communication and pre-literacy and numeracy activities. Moving along the continuum, early learning services could be enabled or supported to provide home visits in conjunction with centre based care (as was done by the gold-standard Perry Preschool Project⁷), or to provide additional learning for parents alongside their children (for

⁶ Sammons, P., Sylva, K., Melhuish, E. C., Siraj, I., Taggart, B., Smees, R., & Toth, K. (2014). *Students' educational and developmental outcomes at age 16: effective pre-school, primary and secondary education (EPPSE 3-16) project research report*(No. RR354). Department of Education.

⁷ <https://evidencebasedprograms.org/programs/perry-preschool-project>

example, in literacy or child development). Finally, and in conjunction with the raft of education reforms currently underway, Government may wish to consider driving a stronger “whānau ora” approach to early learning, focussing on parents and children together, both within and outside the education system (perhaps beginning with the work to develop Goal 2.3: early learning services with wraparound social support).

Recommendation 3: The final draft strategic plan focus on the early learning system as *a system* rather than a collection of regulated services, by providing explicit consideration of ways the early learning system can support parents, families and whānau to promote children’s early learning.

- 29 This developmental focus also leads to stronger recommendations for the role of learning support in the early learning sector. The connection between the draft strategic plan and the Disability and Learning Support Action Plan appears limited to ‘opportunities to explore new models of delivery and services’ and use of equity funding to deliver learning supports. The connection between the two documents should be much more explicit and systemic: for example, through a discussion of workforce development (teachers and other professionals), universal assessments and identification of learning and development issues through early learning centres, and information sharing. We note that a focus on supporting tamariki and whānau Māori is an important analytical approach because of the greater burden of disability placed on them by the social determinants of health and development such as poverty, disadvantage, and exposure to toxic stress and trauma.

Recommendation 4: The final draft strategic plan be linked explicitly to the Disability and Learning Support Action Plan through common goals and recommendations.

- 30 Related, we recommend that earlier identification of children’s learning needs, which is discussed in the document, be elevated to the level of a sub goal. This level of focus is required for real progress to be made. This goal should be implemented in conjunction with the development of new progress tools discussed below.

Recommendation 5: Earlier identification of children’s learning needs be elevated to the level of a sub goal.

The proposed focus on secure and consistent relationships is important and could be expanded

- 31 We are excited by the focus in Goal One on ensuring children experience secure and consistent relationships in early learning settings, which, for many, are their second homes. Children’s learning and wellbeing can only develop to the fullest extent possible in the context of sensitive, responsive relationships with the adults who care for them. Lack of secure care can contribute to toxic stress, which can have long-standing and latent impacts on children’s physical and mental health, as well as their ability to learn. This is being explicitly recognised in the development of Government’s draft Child and Youth Wellbeing Strategy, and we suggest that the final strategic plan should be more clearly aligned with the holistic approach taken by that plan.
- 32 Children themselves have told the Office on multiple occasions about the importance that they place on positive relationships with their peers, parents, family and whānau, teachers, and the community at large. They said essential elements of wellbeing include being valued, heard, and accepted for who they are. We consider that the draft plan’s stated focus on the organisation of teaching staff and transitions (to improve

relationships with children) misses an opportunity to respond to this strongly-stated desire for positive relationships. Transitions and consistency are important, but containing this work to an exclusively structural focus on what happens at certain points in time in early learning services fails to take account of many other aspects of secure care such as teachers' personal characteristics and their training and knowledge about sensitivity and responsiveness.

- 33 If, as we are recommending, the focus is less on structural factors and more on inter-relational factors, it follows that regulation is an inappropriate tool for the foreseeable future. Early learning services can only support relationships to the extent that (for example) physical environments are appropriate, staff are trained and supported, and policy and funding frameworks across both health and education harmonise and work towards a common goal.
- 34 We recommend that further consideration be given to expanding the proposal so that it addresses such questions as:
- a) What are the characteristics of positive relationships that help children thrive in early learning?
 - b) Who are the participants in these relationships – e.g. teachers, parents/whānau and children, teacher to teacher, child to child, early learning service to school?
 - c) How can positive relationships best be promoted in early learning services, and in the early learning system overall?
 - d) How can early learning services work with families, whānau, communities, other Ministry staff (such as early intervention teachers and educational psychologists) and health professionals and services to identify, promote and maintain these relationships?
 - e) Is a regulatory approach to promoting positive relationships the best one?

Recommendation 6: The characteristics, enablers, and requirements of a mechanism to promote better quality relationships in early learning settings be more thoroughly investigated.

The proposed development of new progress tools need to be thought through with a wider interest group

- 35 The draft plan's discussion of new progress tools to support children's learning and wellbeing states that these tools will be co-constructed. The parties to co-construction are not identified beyond 'the early learning sector'. This is too narrow. Parents and whānau should be part of both the development of the tools, and their implementation in individual early learning settings. The Ministry should also give specific consideration to how children's voices can be incorporated into both these stages. While engagement with children is not often undertaken in the early years it is possible - this Office has done so successfully on several occasions, with my staff meeting with children in their early learning settings, in teen parent units, and in family homes. Please feel free to contact the Office for further information. Having a progress tool that asks children their goals and supports them in this individualised way would be significant demonstration of putting the child at the centre of the early learning system.

Recommendation 7: The proposed co-construction of progress tools include children's and parents voices.

36 Additionally and due to the inseparability of learning and development in the early years, we would also like to see these tools developed in consultation with the Ministry of Health and health professionals who work with young children, particularly, community paediatricians and the Well Child Tamariki Ora workforce. In particular, there may be an opportunity for this work to be jointly considered by the Ministry of Education's next steps for the strategic plan and the Ministry of Health's review of the Well Child Tamariki Ora programme.

Recommendation 8: The proposed progress tools be developed in consultation with the Ministry of Health and health professionals who work with young children.

37 The Ministry of Education is a core member of the Deputy Chief Executives Children's Convention Monitoring Group, which is the New Zealand Government's designated coordinating mechanism for the implementation of the Children's Convention, its Optional Protocols, and the Concluding Observations of the UN Committee on the Rights of the Child. This coordinating mechanism has the authority to coordinate the implementation of the Convention across government.

38 At present the draft plan does not refer to the Children's Convention. We urge the Government to ensure the guiding principles and the rights that all children are entitled to under the Convention are holistically considered and reflected in the final strategic plan. These include the General Principles of: non-discrimination; the best interests of the child; the child's right to life, survival and development; and the child's right to participate in matters affecting them.

39 The government's Child Impact Assessment Tool is a useful way to ensure children's rights are being upheld, impacts on children are well understood, children have had their voices heard, and there are no unintended consequences. Every child impact analysis should at a minimum ask: How will this impact on children? Will there be differential impacts? What do children and young people think?

40 In 2016, the UN Committee recommended in their Concluding Observations in regard to early childhood education, that New Zealand:

"(a) Take the measures necessary to ensure that children from low socioeconomic backgrounds, Māori and Pasifika children have effective access to early childhood care and education;

(b) Further invest in the availability and quality of early childhood care and education ensuring that, at a minimum, it is free for children from low socioeconomic backgrounds, and that care personnel is adequately trained, including on Māori and Pasifika cultures." [Para 38, Concluding observations on the fifth periodic report of New Zealand, CRC/C/NZL/CO/5]

41 The next UN review of New Zealand's compliance with the Children's Convention will take place in 2021. It will be important and useful to consider how the final plan can help New Zealand uphold children's rights and respond to the UN Committee's previous recommendations.

Recommendation 9: The final strategic plan be underpinned by the United Nations Convention on the Rights of the Child and a child impact assessment conducted to ensure children's rights are being upheld, impacts on children are well understood, children have had their voices heard, and there are no unintended consequences.

42 We further recommend that the Ministry consider explicitly linking the strategic plan to the UN's Sustainable Development Goal 4, target 4.2 which aims by 2030 to, "ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education." The indicators for this target are:

4.2.1: Proportion of children under 5 years of age who are developmentally on track in health, learning and psychosocial well-being, by sex

4.2.2: Participation rate in organized learning (one year before the official primary entry age), by sex

Recommendation 10: The strategic plan be explicitly linked to SDG target 4.2 which aims by 2030 to "ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education."

CONCLUSION

43 This draft plan contains a number of important proposals that will promote improved early learning in higher quality early learning services. For example, the proposals to reduce adult to child ratios, enhance Equity Funding, and co-design a funding model for Te Kōhanga Reo National Trust will all drive positive change.

44 But while the plan contains many good ideas, they are not integrated within a holistic, environmental understanding of the way children develop and learn in Aotearoa New Zealand: in homes, families, whānau and communities, and in a Treaty-based bicultural nation. Taking a more explicitly child-centred approach to the next stage of development of the plan would result in greater focus on parents, families and whānau as key elements of an effective early learning system, and an enhanced understanding of the role of the Treaty in the sector.

45 All parts of this submission are important, but some of our recommendations require more urgency, particularly the necessity to ensure that throughout the development of this strategy a partnership with Māori is a priority. This partnership acknowledges the obligations under article two of Te Tiriti o Waitangi, and also aligns with a number of recommendations outlined in the Wai 2336: Matua Rautia: Report on the Kōhanga Reo claim.

46 We are, however, confident that the Ministry has the ability to thoroughly consider and implement our recommendations, and would be happy to discuss this submission further at any time.