



Submission by

The Employers and Manufacturers Association

to the

Education and Workforce Select Committee

on the

Holidays (Parent Teacher Interview Leave) Amendment Bill

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About the EMA

The EMA has a membership of more than 8500 businesses, from Taupo north to Kaitaia, employing around 350,000 New Zealanders.

The EMA provides its members with employment relations advice from industry specialists, a training centre with more than 600 courses and a wide variety of conferences and events to help businesses grow.

The Employers and Manufacturers Association represents its members in a region that covers the far north down to Lake Taupo. The membership covers all industry sectors and all business sizes. The EMA has a duty to our members to keep them informed on what changes are being planned that will both positively and negatively alter the way they manage their business. We are actively encouraging our members to be more proactive in this space to enable them to mitigate the slow and unrelenting changes that are unfolding.

The EMA also advocates on behalf of its members to bring change in areas which can make a difference to the day-to-day operation of our members, such as RMA reform, infrastructure development, employment law, skills and education and export growth.

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Introduction

Thank you for the opportunity to make a submission on the Holidays (Parent Teacher Interview Leave) Amendment Bill.

This Bill will significantly add to business costs at a time when many businesses are struggling.

It is hard to argue against better education for children but the way this Bill adds more costs on business is unhelpful and will in some cases encourage owners to question why bother staying in business.

Specific comments as presented by the Bill.

1. What are parent teachers' meetings? Taken from education. govt.nz

This is a meeting between you and the teacher to talk about your child's learning and progress. They might be called parent-teacher interviews, parent-teacher conferences or even learning conferences.

Many schools and kura organise them for early in the year and then after a mid-year school report has been sent home.

They might offer you a set time, invite you to contact them to arrange a time, or more and more schools are asking parents to book a time that suits online using a parent-teacher interview website. Some schools hold meetings before or after school, others run them in the evening.

Meetings are often held in the evenings, and you'll be given a time to meet with each of your child's teachers. They are likely to be for only 5 to 10 minutes and you might attend up to 6 meetings in the same evening.
parents.education.govt.nz

2. We note the under General policy statement, it refers to the benefits for parents, children, and employers but fails to identify what are the benefit(s) for employers. If there are benefits for employers why were these not highlighted in the General policy statement. We would argue there are no benefits for employers contained within the Amendment Bill. It simply is an exercise in shifting costs to employers. This is a public/social issue and therefore should not be funded by employers.
3. The Bill adds costs in an unfair manner as some sectors may well have a completely different gender and age profile from others thus not requiring them to fund staff attending parent teachers meeting for 4 hours on pay.
4. Interpretations. Parent. The Bill describes a parent as the child's mother, father, guardian or person in place of a parent to that child. These people may well all work at different employers. We argue that at any one parent teacher interview all four

may well attend thus adding the costs on 4 different employers. There is no way an employer could know whether a person was any one of the “parent” criteria’s thus the system could be flouted.

5. Under 61F the Bill requires the employee to give the employers at least 3 days’ notice of the intention to take this leave. Given parent teacher interviews are programmed well in advance we question the very short notice period required by the employee. The 3-day time frame leaves little time for employers to organise cover for staff taking up this leave. We also submit that if further information was required by the employer the 3 days’ time frame creates a very short timeframe for which the information could be sought and delivered to the employer, again creating unnecessary delays and problems.
6. There is no requirement for employees to verify time, place and location of such parent teacher meetings. This loophole is very able to be abused. It could be that another person who calls themselves a parent of the child or guardian requests the leave but then does not attend the meeting. This is fraudulent from the employee’s perspective and another cost/loss to the employer. The Bill has no mechanisms for employers to verify that these meetings are in fact taking place.
7. The Bill does not differentiate between part time, casual and full-time employees. Therefore, those working part time or on a casual basis gain more than those who are full time. We live in a democratic society we fairness and equity must be paramount in government initiatives and policies. This Bill does not meet these criteria.
8. The Bill is unclear on the following possible interpretations.
 - a. Is the leave for one child for one meeting once per year?
 - b. Is the leave for one child for every occasion of parent teacher interviews (2- 4 times per year)?
 - c. Is the leave to cover a number of children under the care of the parents?
9. Any of the above situations poses more time and costs for employers to find replacement staff or rescheduling the work among other workers.
10. Currently in NZ employees are eligible to 43 paid leave days. Adding potentially more paid leave days to this amount is not helping NZ productivity. Every hour paid by wages requires at least (at a minimum) 4 hours of production time to be worked. Therefore the 4 hours off would require 16 hours or days of full productive employment to at least be cost neutral. In reality employers can never make this loss up.
11. Wages can only be paid from profits, savings or overdrafts, the last two options are not sustainable. We would ask has a cost analysis been carried on this Bill. What are the business costs compared to any perceived benefits?
12. We also note that the majority of parent teacher interviews are conducted after working hours. (See point 1) That being so why does the Bill require 4 hours of paid

time for these meetings when in fact they occur after working hours. Given the advice from point 1. employees can choose out of work hours to attend these meetings.

13. We also note that these meetings are usually short in the region of 10- 15 minutes. If this is true, then again why are employers paying for up to 4 hours for a short interview meeting.

14. Given the points made above the EMA recommends that this Bill does not proceed.

We appreciate the ability to make submissions on this Amendment Bill.

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