



Consultation feedback report:

- **Regulating for 80% qualified teachers**
- **Strengthening the person responsible requirement in teacher-led centre-based services and hospital-based services**

Tranche 2 of the Early Learning Regulatory Review

June 2022

Contents

Introduction.....	1
Review of the Early Learning Regulatory System	1
Regulating for 80% qualified teachers	1
Strengthening the person responsible requirements	1
Consultation and submissions	2
Online submissions via the survey	3
Written submissions.....	6
Method of analysis.....	7
Survey responses	8
Regulating for 80% Qualified Teachers.....	9
Proposal 1: Counting early childhood education and primary qualified teachers as ‘qualified teachers’	9
Proposal 2: Options to regulate for 80% qualified teachers.....	11
Proposal 3: Barriers preventing services from reaching 80%	15
Strengthening the person responsible requirement in teacher-led centre-based services and hospital-based services	20
Proposal 1: Require the person responsible to hold a Category One or Two practicing certificate in teacher-led centre-based services and hospital-based services	20
Proposal 2: Clarifying the person responsible role in teacher-led centre-based services	23
Proposal 3: The person responsible in teacher-led centre-based services must hold a first aid qualification	25
Proposal 4: Clarifying the person responsible role in hospital-based services.....	27
Additional comments	29

Introduction

Review of the Early Learning Regulatory System

The Ministry of Education (the Ministry) is currently undertaking a review of the early learning regulatory system. The purpose of the Early Learning Regulatory Review (the Review) is to ensure that the regulatory system for the early learning sector is clear and fit for purpose to support high quality educational outcomes. The Review is timely due to the significant changes in the sector since the current regulatory system was established in 2008, as well as proposed changes under the Early Learning Action Plan 2019-2029 (the Action Plan) and Review of Home-based Early Childhood Education.

The Review is being completed in different tranches to ensure high priority issues can be progressed in a timely fashion while allowing additional time for other matters that require further policy work and consultation. This consultation report covers feedback on two sets of proposals from tranche 2 of the Review – regulating for 80% qualified teachers and strengthening the person responsible requirement in teacher-led centre-based services and hospital-based services.

Regulating for 80% qualified teachers

In the Early Learning Action Plan, the Government set Action 3.1 to regulate for 80% qualified teachers in teacher-led centres before regulating for 100% in the long term. This is based on the principle that teaching qualifications provide teachers with the professional competencies and skills that lead to positive outcomes for children.

When the Government regulates for 80% qualified teachers, services would need to either employ or engage or use a high proportion of qualified teachers depending on how the 80% is counted. This standard would apply to both teacher-led centres and hospital-based services because they are subject to the same regulatory and funding requirements.

Services currently operating under 80% tend to serve population groups traditionally underserved by the education system. We recognise the value of these services and want to know what barriers prevent them from operating at 80% and what support they need.

Strengthening the person responsible requirements

In teacher-led centres, persons responsible are directly involved in, and primarily responsible for, the day-to-day education and care, comfort, and health and safety of the children. On the other hand, persons responsible in hospital-based services have primary responsibility for the education of children in the service, ensuring supervision of children in the activity room, and supporting children's health, safety, and care. In both service types, the person responsible is required to supervise children and the adults providing education and care.

The person responsible in teacher-led centres can hold an ECE or primary teaching qualification, while in hospital-based services they must hold an ECE teaching qualification. They must be certificated with the Teaching Council of Aotearoa New Zealand.

Currently, the person responsible requirement is the only safeguard ensuring a qualified and certificated teacher is present when children attend a service. Depending on how we regulate for 80% qualified teachers (options 1 and 2), the person responsible requirement would remain the only regulation guaranteeing a qualified and certificated teacher is present whenever children attend.

Consultation and submissions

On 8 September 2021, the Ministry of Education released a discussion document outlining:

- options and proposals to regulate for 80% qualified teachers, and
- four proposals to strengthen the person responsible requirement in teacher-led centre-based services and hospital-based services.

Respondents could provide feedback by completing an online survey or by emailing a written submission. Online information sessions were also held, including a Pacific services Talanoa on 19 October 2021 and Puna Reo hui on 3 November 2021, to further engage with the sector.

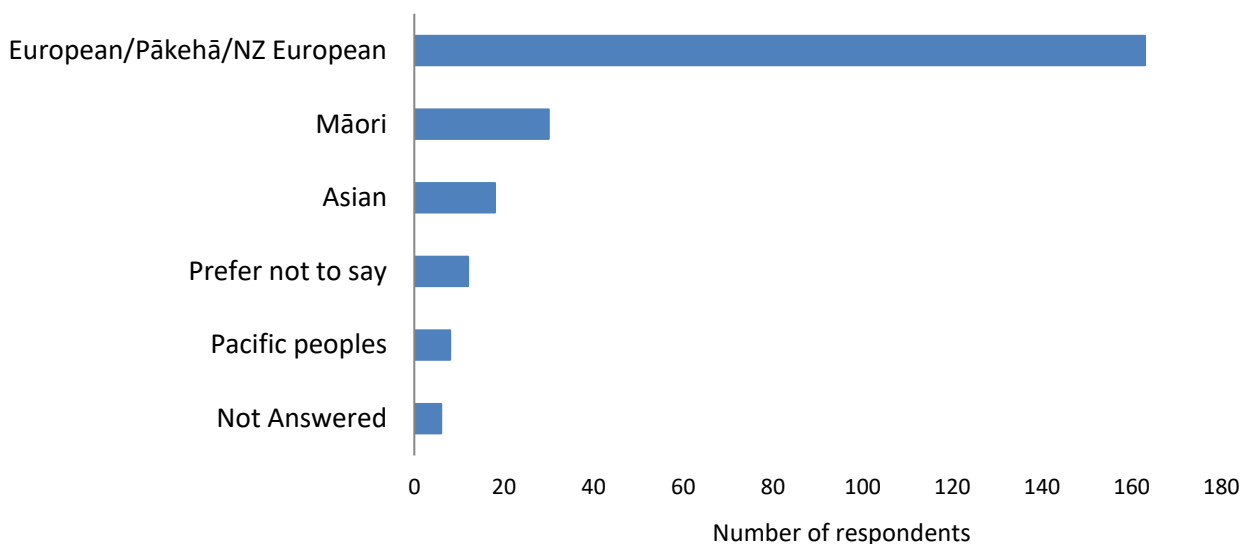
Consultation formally closed on 22 October 2021. Due to COVID-19, particularly the Delta and Omicron outbreaks, some aspects of consultation were delayed. Consequently, further online engagement sessions were held in January and February 2022 in place of in-person sessions. During these engagements, we heard feedback from the Sector Advisory Group, a group of ECE teachers, and Pacific services in Auckland, respectively.

Online submissions via the survey

The online survey received 218 responses. Information was collected about these survey respondents' ethnicity, region in which they reside, the stakeholder group and service type they were affiliated with.

Ethnicity

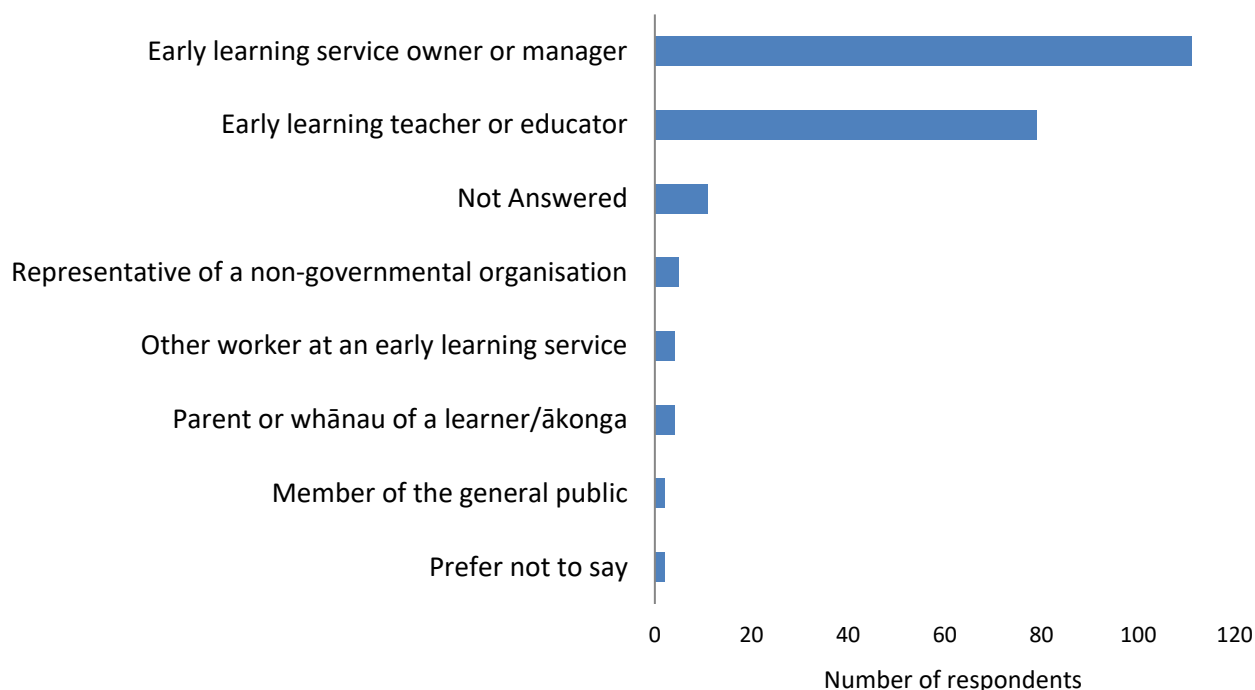
Survey respondents were asked to select the ethnicity or ethnicities that best described them*. Most respondents were European/Pākehā/NZ European (75%), with the second-largest population group being Māori (14%).



*This was a multi-response question, which enabled respondents to choose multiple categories. For example, several respondents noted that they were both European/Pākehā/NZ European and Māori.

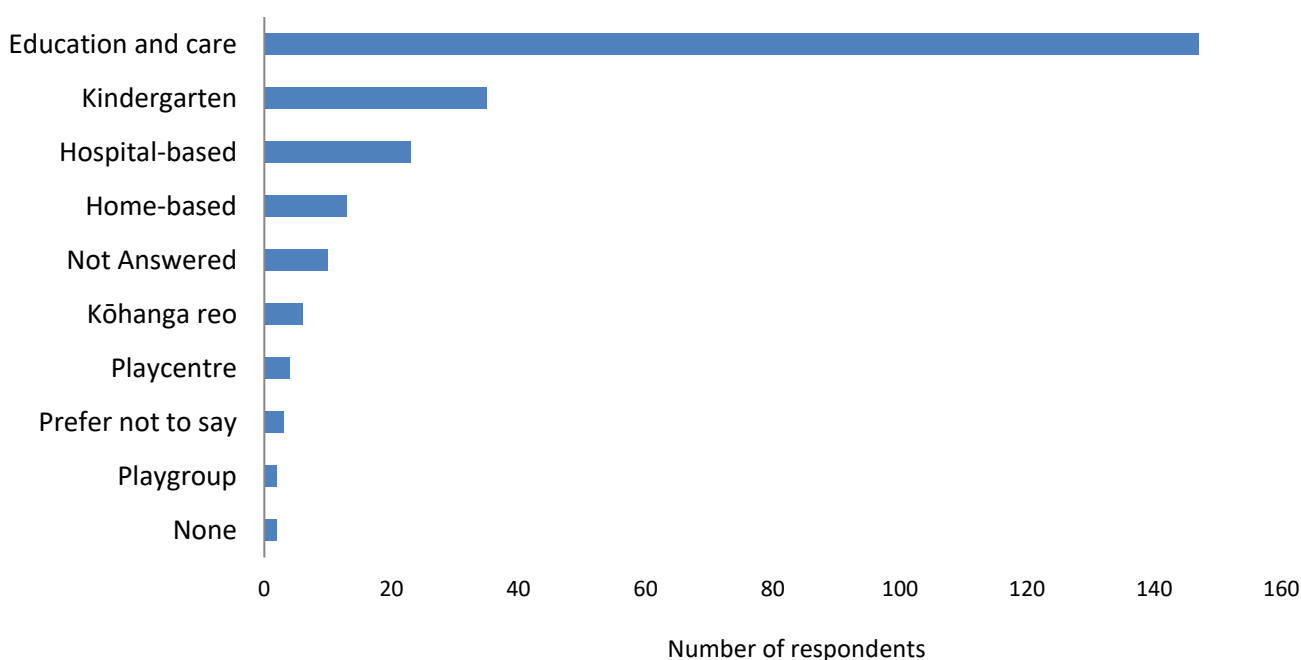
Stakeholder group

Survey respondents were asked to select the category that best described their connection to the sector. Most respondents consisted of early learning service owners or managers (51%) and early learning teachers or educators (36%). Respondents were limited to selecting one category that they best identified with, although they could specify further by selecting 'other' in the text box option.



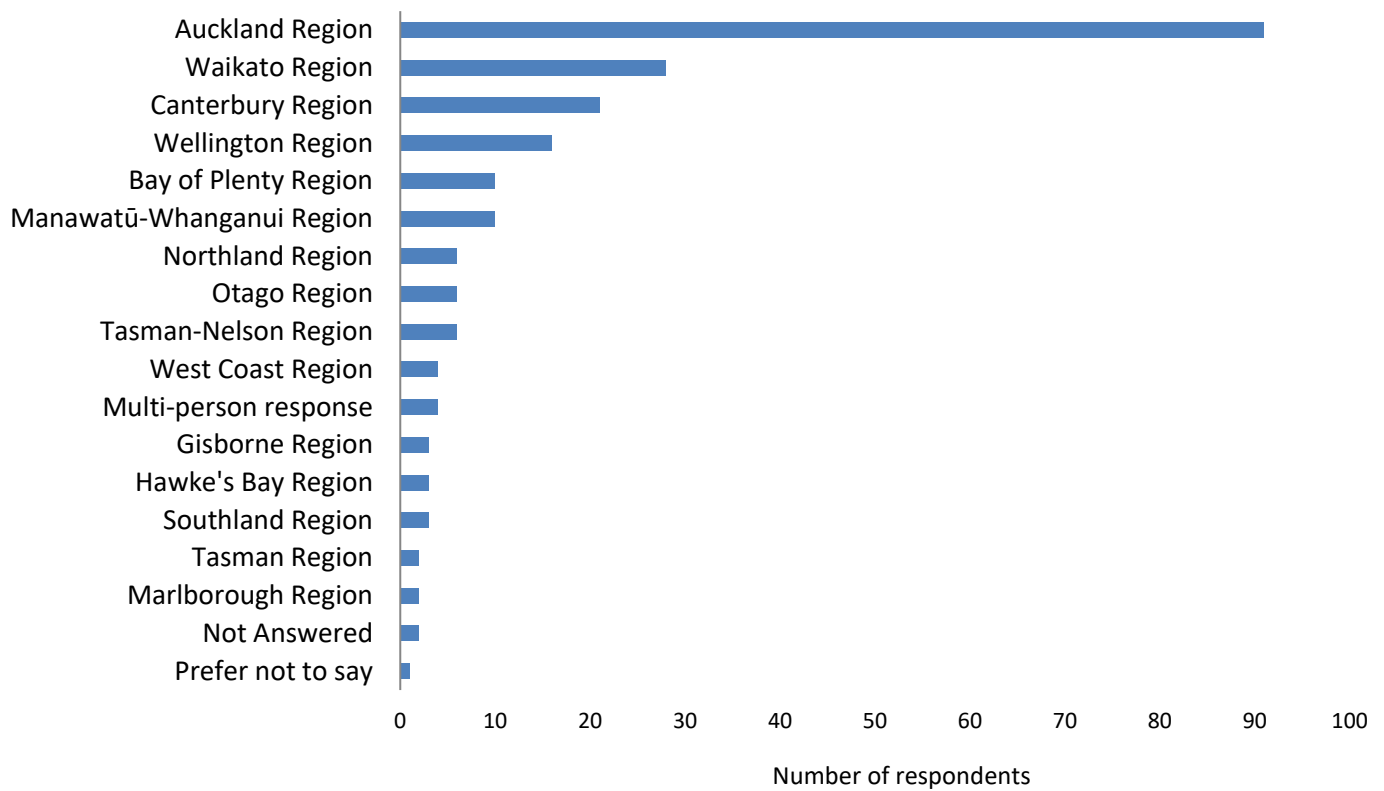
Type of early learning service

Survey respondents were asked what type of early learning service they were associated with. They were largely associated with education and care centres (67%) and kindergartens. Respondents were able to select multiple categories for this question.



Region

Regional data was also collected. Auckland, Canterbury, and Waikato comprised 64% of all respondents.



Written submissions

We received 34 detailed written submissions by email from the people and organisations listed below.

Organisation

1. Devonport Methodist Childcare Centre
2. Just Kidz Orakei
3. Just Kidz Huapai
4. Twinkle Twinkle
5. Cromwell Early Learning Centre Inc.
6. He Whānau Manaaki Kindergartens
7. RosyCheeks Early Learning Centre
8. Te Rito Maioha Early Childhood New Zealand
9. Kindy Kids Huapai
10. Uplands Kindergarten
11. PAUA (Pre-schoolers At-home Uniquely Achieving) Early Childhood Home Based Care Service
12. NZEI Te Riu Roa
13. The Institute for Early Childhood Studies, Faculty of Education, Te Herenga Waka Victoria University of Wellington
14. Growing Minds Early Childhood Centre
15. Sovereign Star Preschool
16. Kidsfirst Kindergartens Lincoln
17. Kidsfirst Kindergartens Middleton
18. Teaching Council of Aotearoa New Zealand
19. Office of Early Childhood Education – Te Tari Mātauranga Kōhungahunga
20. Hillcrest Childcare
21. Dynamic ECE Relievers
22. Kids Count Ltd
23. Kaitiaki Kindergartens
24. KidzWay Early Learning Centre
25. Montessori Blenheim

Individuals

26. Sharleen Edmonds
27. Merryn Bayliss
28. Lesley Gambles
29. David Haynes
30. Malo Taeao
31. Holly McLauchlan
32. Taylar Freeman
33. Melissa White
34. Heather Castell

Method of analysis

The online survey submissions and the written submissions were analysed using a coding framework that organised survey data by question and theme. Most written submissions followed the structure of the online survey which allowed these submissions to also be analysed thematically. The submission excerpts presented for each question come from responses to the online survey and written submissions.

Where respondents discussed several issues related to a given proposal, these were cross-coded to multiple themes. In this way, respondents with comments that spanned multiple themes had their views captured in all appropriate places.

The most common themes are presented in this report. However, in some cases, more minor themes are included to enhance the understanding of other themes or add nuance to sector views.

Survey responses

In the online survey, survey participants were invited to express the extent to which they agreed with each aspect of the proposal or option being consulted on. Respondents could select 'strongly agree', 'agree', 'neutral', 'disagree', or 'strongly disagree'. However, for visual simplicity in this report, 'strongly agree' and 'agree' are merged into 'agree', and 'strongly disagree' and 'disagree' are merged into 'disagree'.

As part of the proposal to regulate for 80% qualified teachers, three options are discussed. For this question, respondents could select 'Option 1', 'Option 2', 'Option 3', or 'Not sure'.

A free-text box was also available for each proposal. This allowed respondents to provide written responses to each proposal. Two of the proposals included two or three free-text boxes where written comments were sought for multiple aspects of the proposals. These related to the questions on options to regulate for 80% and barriers preventing services from reaching 80%.

Survey participants did not need to answer every question, participants who did not respond to a question were excluded from the denominator. For example, if 136 people agreed to the question and there were 200 responses to the question, this would be recorded as 68% agreement rather than the total number of survey participants (218), which would equate to 62%.

In proposal 2 of regulating for 80% qualified teachers, respondents were able to select multiple options within the same set of checkboxes. For this reason, the number of survey participants who responded to the question (e.g., 216) was used as the denominator, rather than the number of total responses across each option (e.g., 245). Consequently, final percentages for these questions do not total to 100%.

Regulating for 80% Qualified Teachers

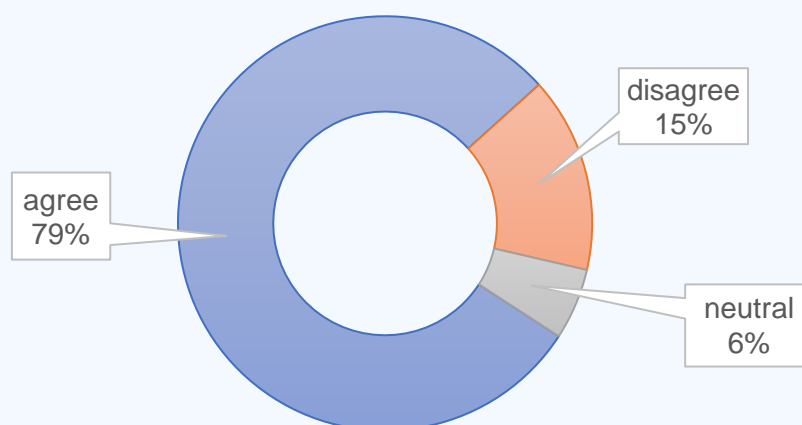
Proposal 1: Counting early childhood education and primary qualified teachers as 'qualified teachers'

Explanatory text from the survey

We propose enabling early childhood education (ECE) and primary qualified teachers certificated with the Teaching Council of Aotearoa New Zealand to count as qualified teachers for regulatory and funding purposes in teacher-led centre-based services and hospital-based services.

A student teacher in their final year of study towards an ECE teaching qualification would not count towards the 80% standard.

Question 1: Do you agree that both ECE and primary qualified teachers holding a current practising certificate should count as qualified teachers?



Preferably only ECE qualified teachers to be considered qualified teachers

The most prominent theme was that respondents preferred individuals with early childhood qualifications to be counted as qualified teachers.

"I would prefer for all teachers in ECE to have a qualification that was specific to ECE. it is a specialised area of teaching which needs to be recognised." – **Kindergarten teacher or educator**

"The inclusion of primary qualified teachers to count towards the 80% qualified teachers in early childhood services dilutes the objective quality teacher and leadership." – **Anonymous Union**

"80% means 80% for ECE teacher qualifications. Nothing less is acceptable. All infants, toddlers and young children need to have experienced teachers to recognise 100% qualified teachers." – **Kidsfirst Kindergartens Lincoln**

Primary should count under certain circumstances

While still acknowledging the differences between the two qualifications, many respondents did share their support of counting primary qualified teachers holding a current practising certificate towards the 80% standard.

"I agree they should both count, but this is not to say that I think a high number of primary qualified teachers in any one service should be allowed. I would not want to see the regulation slip below needing at least 50% ECE qualified

teachers in the service.” – **Kindergarten owner or manager**

This was particularly expressed as being necessary because of current shortages of qualified ECE teachers.

“We have such a huge shortage of quality teachers that we need to be able to allow more qualified teachers (primary and ECE) to work in the ECE sector.” – **Education and care teacher or educator**

“I’m writing in support of the proposal to amend the current criteria to allow all teachers, including primary trained, to count towards all regulations...Given the ongoing teacher shortage, any further requirements to need more ECE qualified teachers would make our centre, among countless others, inoperable.” – **Montessori Blenheim**

Many of these respondents emphasised that additional training in or significant knowledge of Te Whāriki should be expected of primary teachers if they are counted towards the 80% standard.

“We feel that anyone working in ECE will need to have a strong knowledge of Te Whāriki and the holistic way in which children of this age group learn and develop.” – **Kidsfirst Kindertartens Middleton**

“To me early childhood requires specialized teachers who are trained with an understanding and knowledge of Te Whāriki, Primary school teachers don't have this knowledge. Primary school trained teachers should be required to do same form of ECE study to be able to be classed as a qualified ECE teacher.” – **Kindergarten owner or manager**

“ECE qualified teachers can also include Primary teachers, but feel they should be required to add ECE learning and teaching modules as the philosophy is quite different” – **Hospital-based teacher or educator**

Count final-year student teachers

Many respondents, in particular those associated with education and care services, mentioned that student teachers in their final year of study towards an ECE qualification should be counted towards 80%.

“I think there is value in including a student teacher in their final year of study as a qualified teacher if: the student teacher has been at that centre for some time and is in a permanent role, and it is their home centre, and they contributing to centre life, assessment and

evaluation, and regulatory compliance. (i.e., not an agency reliever or casual employee), or if the centre has a shortage of registered teachers and needs to include for funding purposes.” – **Education and care centre owner or manager**

“A student in their final year should be allowed as well. This provides an incentive for the sector to employ and support students (who can only work part time due to study requirements).” – **Education and care centre owner or manager**

“As we raised as part of the Regulatory Review Advisory Group, a student teacher in their final year of study towards an ECE teaching qualification should count towards the 80% standard. In a small centre with 4 kaiako, to meet 80% all 4 must be qualified (in effect 100%).” – **Te Rito Maioha Early Childhood New Zealand**

During our targeted consultation with puna reo and Pacific medium services, many attendees commented that counting student teachers in their final year of study could help to alleviate teacher supply issues. This was particularly heard from Pacific services, who felt that it could be a way to attract graduating teachers who will become qualified in the near future.

“We are low in teacher supply. We also have an aging teaching pool at our Aoga Amata so another issue is how do we attract graduating teachers to our Aoga Amata while also trying to keep it affordable for our families. I also feel that it would be helpful if last year students could be included or counted as a qualified teacher.” – **Pacific Talanoa attendee**

Different requirements for puna reo and Pacific medium services

Many attendees of the targeted consultation with puna reo and Pacific medium services also voiced the need for different requirements for their teachers and services. Often, this centred around language skills being more important than qualifications in these services. Thus, many attendees felt that quality in a Pacific centre does not necessarily look the same as quality in an English medium centre.

“I think one thing for us to consider is to recognise our teachers coming from the islands with years of experience instead of the qualification. Majority of our teachers are coming over as experienced teachers but have to study again to meet the requirement to be a registered teacher.” – **Pacific Talanoa attendee**

Proposal 2: Options to regulate for 80% qualified teachers

Explanatory text from the survey

In the Action Plan, the Government set an objective to regulate for 80% qualified teachers in teacher-led centre-based services before regulating for 100% in the long term.

We have developed three options for consultation to regulate for 80% qualified teachers in teacher-led centre-based services and hospital-based services. Each option counts 80% qualified teachers differently.

The current funding rules would continue to apply under each option.

Option 1: Retaining a high percentage of ECE qualified and certificated teachers

This option modifies the current 50% qualified teachers regulation in two ways.

- Services would need to employ or engage 50% ECE qualified and certificated teachers.
- Services would need to employ or engage an additional 30% ECE and/or primary qualified and certificated teachers.

This is measured against the service's licence maximum (full licence) or number of enrolments (probationary licence).

Option 2: Match the Regulations with the funding rules

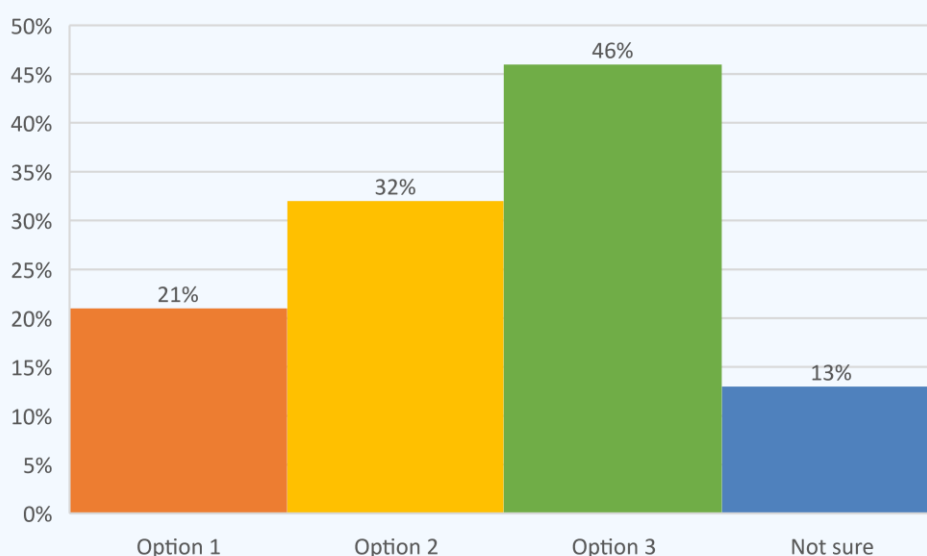
This option requires services to use 80% qualified and certificated teachers to cover minimum adult-to-child ratio requirements across a four-month period. It would also allow services to use discretionary hours for both regulatory and funding purposes.

Option 3: Ensuring ECE qualified and certificated teachers are always present

Each service needs to employ or engage 80% qualified and certificated teachers. This is measured against minimum adult-to-child ratio requirements for services with a full licence and number of enrolments for services with a probationary licence.

Whenever children attend, there must be 50% ECE qualified and certificated teachers in contact with children. This is measured against minimum adult-to-child ratio requirements when children attend.

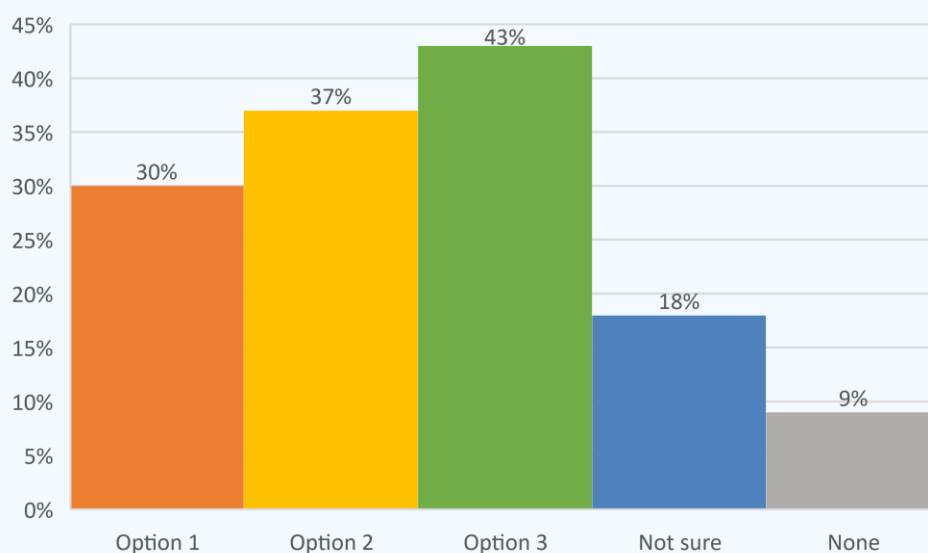
Question 1: What option(s) best support quality outcomes for children?



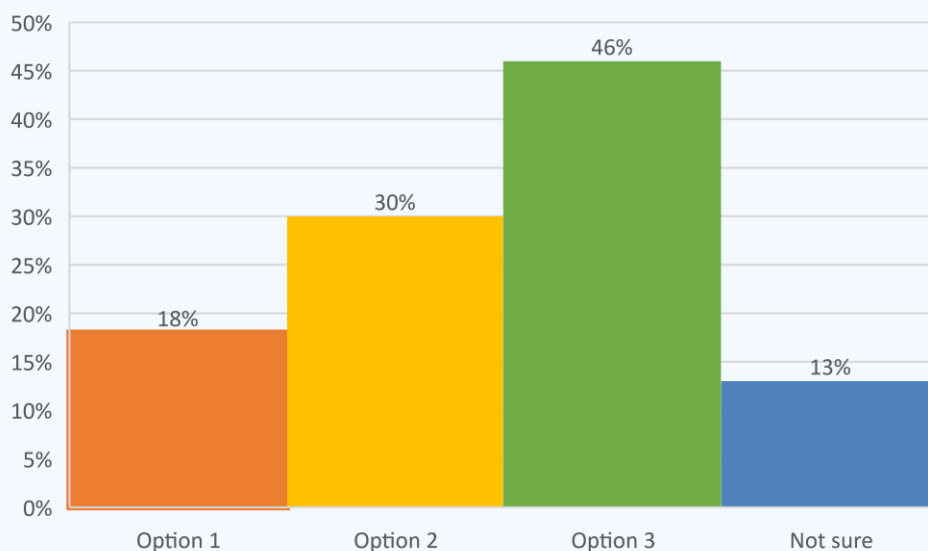
Reminder of options

- Option 1: Retaining a high percentage of ECE qualified and certificated teachers
- Option 2: Match the Regulations with the funding rules
- Option 3: Ensuring ECE qualified and certificated teachers are always present

Question 2: Which option(s) would your service be able to comply with in the near future?



Question 3: Which option(s) do you prefer?



*Note: Respondents were able to select multiple options in the above questions, therefore percentages do not total 100%

Support for 80% qualified

Respondents often supported improving the percentage of ECE qualified teachers working at services.

“This ensures that qualified and certified teachers are on the floor with the children at all times.” – **Education and care teacher or educator**

“I believe that option 3 would best suit our hospital-based service as I believe that qualified and certified teachers should be in contact with children.” – **Hospital-based teacher or educator**

“The more ECE qualified teachers the better!” – **Education and care teacher or educator**

Teacher supply

Many respondents noted that improving percentages would be difficult due to the current lack of qualified teachers, which could impact on services' sustainability.

“With teacher shortage we are struggling to fill positions. While I agree in principle with increased number of qualified in centres, this doesn't match quality.” – **Education and care teacher or educator**

“None of these options will work if you can't attract or retain qualified teachers in a sector which is underpaid, underfunded and undervalued.” – **Education and care teacher or educator**

“It can be very difficult to find qualified, certificated ECE teachers at the moment. If a teacher is ill or on leave etc, and we are unable to find a qualified ECE reliever, we could breach the minimum requirements if they are higher than 50%.” – **Education and care teacher or educator**

Some respondents identified that the teacher shortage is particularly an issue for small, rural, and/or Māori and Pacific medium services.

“As a small service there is little leeway when a teacher is absent to maintain 80% as experienced hospital-based relievers are difficult to recruit. The ability to have some fluctuations are helpful.” – **Other worker at a hospital-based service**

“We have over 80% registered teachers employed but struggle to employ Pacific language speakers and this will ultimately prevent us from having teachers who are not degree qualified or registered. I agree that we need quality for children which is not just about qualified.” – **Education and care centre owner or manager**

“We have to remember that our priority children are predominantly in isolated areas, where employing qualified educators is difficult, and the areas are also LSE areas and many Māori providers which also have a low supply of qualified staff. We do not want to set the sector up to fail.” - **Sharleen Edmonds**

Feasibility and flexibility for services

Many respondents indicated that they selected their chosen option on account of it being more feasible and flexible for their services.

“We are in a 'hard to staff' region. There are always qualified registered teachers present, but consideration of lunch times/non-contact etc can make filling these ratios with quality staff challenging. [Option 3] would give us flexibility to use teachers in training or experienced unqualified teachers for this cover (under the guidance of a qualified teacher).” – **Kindergarten, and Education and care owner or manager**

“We have been operating using Option 2 for many years and it works well. It also shows clearly that a centre is complying with the regulations.” – **Education and care centre owner or manager**

“Option 2 seems to be most feasible with some leeway potentially matching it to the funding band.” – **Just Kidz Huapai**

“[Option 1] is the most attainable and reasonable for our service at this time.” – **Education and care centre owner or manager**

Better outcomes for tamariki

Some respondents highlighted that considering which options provide the best outcomes for tamariki was important to them. This comment was particularly made in reference to option 3.

"I think option 3 is best for outcomes for children, but option 2 is much more achievable. However, I do worry about centres currently not able to reach level 2, and the how that will affect tamariki who currently attend (particularly if they are in remote areas or meeting a particular demand (e.g., Pasifika centre))." – **Kindergarten owner or manager**

"[Option 3] To support quality outcomes for children in that an understanding of the Te Whāriki curriculum and implementation is understood and is actively applied." – **Hospital-based teacher or educator**

"A centre should have 80% qualified teachers at all times for the best outcome for children's learning and well-being." – **Kindergarten owner or manager**

80% in contact with tamariki

A number of respondents suggested that there should be an option where 80% qualified teachers are in contact with children at all times, or 80% ECE qualified teachers in contact with children.

"An alternative option for 80% qualified and certificated teachers/kaiako: ensuring 80% ECE qualified and certificated teachers/kaiako at all times children attend." – **Teaching Council of Aotearoa New Zealand**

"I think it should not go below 80% because if we really want high quality and high ratios, we need qualified and certificated teachers who are in contact with children." – **Education and care teacher or educator**

"Ensure that, at all times, 80% of adults in contact with children are ECE qualified and certificated teachers, and, where children are grouped in separate spaces, to have at least one ECE qualified teacher located with each group." – **Individual respondent**

Standard too high

Some respondents commented that the proposed options (or aspects of them) would be difficult or too high a standard for their service to manage.

"We have conducted a trail of applying 50% ECE teachers and 80% qualified teachers as being in contact with children at all times and found that maintaining these ratios for opens and closes is very difficult when juggling the rosters and utilising the team to cover all ratios of those who can and will open and close...Maintaining these ratios to cover breaks, lunch breaks, non-contact, short notice sick leave and annual leave is a hugely stressful juggling act." - **Twinkle Twinkle**

"To mandate different percentages of ECE and primary qualified teachers will make it impossible for many centres to obtain the required ratios, especially centres in remote areas." – **Education and care centre owner or manager**

"Whilst I am in support of qualified certified team members, I do not believe that we should force this high rate on centres. This is for 2 reasons. Firstly, our out-of-control teacher shortage which will not be fixed in the next few years." – **Education and care centre owner or manager**

Proposal 3: Barriers preventing services from reaching 80%

Explanatory text from the survey

Regulating for 80% qualified teachers could impact on the diverse network of services.

A high proportion of services currently operating under 80% are hospital-based services, isolated services, Māori and Pacific bilingual and immersion services and services in low socio-economic areas. We recognise the value of these services and want to ensure they are well supported as we introduce the new 80% standard.

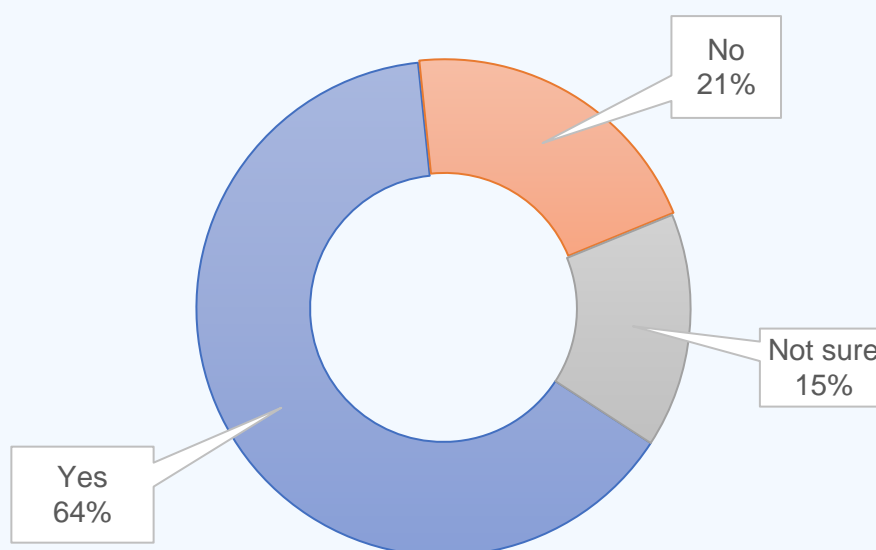
Summary of the options

Option	Unit of calculation	Time period of calculation
Option 1: Retaining a high percentage of ECE qualified and certificated teachers	$\frac{\text{ECE qualified staff employed or engaged by the service}}{\text{Total staff required to satisfy ratios (licence maximum)}} = 50\%$	Must be employed or engaged while service is open
	$\frac{\text{Primary or ECE qualified staff employed or engaged by the service}}{\text{Total staff required to satisfy ratios (licence maximum)}} = 30\%$	
Option 2: Match the Regulations with the funding rules	$\frac{\text{Primary or ECE qualified staff working with children}}{\text{Total staff required to meet ratios for children in attendance}} = 80\%$	Average across four months. Unqualified teachers can count as qualified for up to 40 hours per four months.
Option 3: Ensuring ECE qualified and certificated teachers are always present	$\frac{\text{ECE qualified staff working with children}}{\text{Total staff required to meet ratios for children in attendance}} = 50\%$	All times children attend
	$\frac{\text{Primary or ECE qualified staff employed or engaged by the service}}{\text{Total staff required to satisfy ratios (licence maximum)}} = 80\%$	Must be employed or engaged while service is open

Question 1: What barriers prevent services from qualifying for 80-99% funding rates? Would the same barriers prevent services from complying with options 1 and 3?

Question 2: What support would you need to operate with 80% qualified teachers under each of the options?

Question 3: Should we regulate for 80% qualified teachers for all teacher-led centre-based services and hospital-based services?



Barriers

Teacher supply

The main barrier identified by respondents was that tight teacher supply, particularly the supply of ECE qualified teachers, would prevent services from complying with the 80% qualified teacher requirements.

“Finding qualified teachers is becoming a barrier. They are now often newly qualified, after just a one-year postgraduate, and are often new to NZ culture as well. So, lots to learn still. Valuing a newly qualified teacher with no experience over a primary school trained teacher who has been in the centre for years doesn’t quite seem fair and would it truly create higher quality care.” – **Education and care centre owner or manager**

“Greatest barrier at the moment is finding qualified staff. This must be very difficult in rural areas, as well as low SES areas where services struggle and so are not an attractive proposition.” – **Other worker at Kindergarten**

“Anecdotal we believe that the ECE sector is constrained by a teacher workforce shortage. The last few years, especially since the kindergarten collective agreement for 2019-2022 was renegotiated and the sector calculated the disparity in remuneration for other teachers not in a kindergarten, there has been a real decline in enthusiasm for ECE teaching as a career.” – **Devonport Methodist Childcare Centre**

Pay parity and funding rates

Respondents indicated that low funding rates and low salaries are a barrier to services operating at 80% qualified teachers. Some respondents also noted that the teacher shortage may be attributable to the pay and conditions offered to teachers in the sector.

“If services paid their teachers well then there would not be issues filling these places. The issues around teacher shortages are due to pay and conditions - not lack of fully qualified NZ trained EC teachers.” – **Member of general public**

“The barrier is the salary cost being increased terrifically with the influence by Pay Parity. The same barriers will prevent services from complying with options 1 and 3.” – **Education and care centre owner or manager**

“The current teacher shortage and the lack of adequate funding (in line with Kindergarten) to enable centres to opt in to pay parity and pay the teaching team what they deserve. A teacher, is a teacher, is a teacher” – **Education and care teacher or educator**

Cost of qualified staff

Some respondents considered the cost of employing qualified staff a barrier stopping services from operating with 80% qualified teachers.

“Cost of qualified teachers and available pool of qualified teachers who are seeking employment.” – **Kindergarten teacher or educator**

“We are a small community centre; therefore, we are not able to offer experienced teachers for high hourly rate, compared to reliving agency and other big cooperate ECE centres. And most of the qualified teachers would like to work part time, especially the school hours and not working during the school holidays.” – **Education and care centre owner or manager**

“Cost of employing qualified teachers. Licensed for 12 with a fluctuating roll of 5 - 9 children. We cannot afford to pay more qualified teachers. We are a non-profit community run rural and isolated centre who already fundraise \$5-10 thousand per year to provide a high-quality service and pay to retain staff.” – **Education and care teacher or educator at a rural and isolated non-profit community service**

Difficult for hospital-based services

Some respondents noted that it may be particularly difficult for hospital-based services to meet the 80% qualified teachers requirement, due to the specialised nature of hospital-based ECE.

“The highly specialised nature of hospital-based services may prove to be a barrier when regulating for 80% in these services. A staged implementation approach is recommended to regulate for 80% in hospital-based services.” – **Kids Count Ltd**

“May be difficult for hospital-based services that only employ one Hospital Play Specialist.” – **Hospital-based teacher or educator**

“We believe some services might have to be considered differently because of special circumstances, e.g., hospital-based services. However, it is not good enough to have less than 80% ECE qualified teachers present and available at all times that children are present.” – **OMEP (World Early Childhood Organisation) Aotearoa New Zealand**

Barriers for Māori and Pacific services

Respondents also highlighted the impact of particular barriers, like the teacher shortage, pay, and funding, on Māori and Pacific services and supporting cultural competency.

“Services who are operating under 80% (i.e., hospital-based services, isolated services, Māori and Pacific bilingual and immersion services and services in low socio-economic areas) should be given extra funding to attract ECE teachers to work in these areas.” – **Kindergarten and Education and care centre teacher or educator**

“The shortage of qualified teachers to employ. Being a Samoan based preschool, the shortage of Samoan qualified teachers to teach the language and culture.” – **Education and care centre teacher or educator**

“Protection of Māori, Pacifica, and Low-Income/ Vulnerable Communities. These children need the support of the lower child to teacher ratios.” – **Kidsfirst Kindertowns Middleton**

“Shortage in staffing!! We are a Puna Reo it is very hard to source Te reo Māori speaking kaiako as well as trained kaiako.” – **Education and care centre owner or manager**

Additionally, during our targeted consultation with Puna reo and Pacific medium services, attendees raised that the difficulty of the IELTS exam creates barriers for Pacific teachers trying to become qualified. Attendees found this a particularly inconvenient barrier, as these teachers would be working Pacific medium services, not English services.

“Agree IELTS is designed as a blanket rule to test your ability to speak English but may be the requirement should be tailored to fit those that are teaching in this setting i.e Pacific language EL where English is not the medium of instructions.” – **Pacific Talanoa attendee**

Support

Improve funding

Many respondents commented that improving funding rates and staff wages/salaries would help services to operate with 80% qualified teachers.

“A funding rate that actually meets the ratios we work with, so we could employ more staff to cover breaks, staff leave, non-contact time etc.” – **Education and care centre owner or manager**

“We would need a higher level of funding to afford staff wages. This could be easily brought into effect for low socio Centres like ours by increasing significantly (at least doubling) the Equity Funding components and/or Targeted Funding for Disadvantaged. This will increase funding to those that really need it while not giving more to those that potentially don't need it or need it less because they can increase parent fees instead.” – **Education and care centre owner or manager**

“ECE Funding that matches kindergartens so we can offer the pay parity scales of ALL teachers.” – **Education and care centre owner or manager**

Access to qualified teachers

There were also several responses that noted access to quality, qualified teachers as being a factor that could aid services in reaching 80%.

“Access to quality trained teachers. -many of our trained relievers that we currently use might get pulled into roles with other organisations. There has to be enough QUALITY trained teachers.” – **Kindergarten teacher or educator**

“More teachers, NZ based teachers with training in Te Whāriki, knowledge of Te Tiriti o Waitangi, remove the mandatory vax to enable teachers to stay in the industry.” – **Education and care centre owner or manager**

Some respondents noted that this support would be especially valuable to rural communities.

“We need more qualified teachers, especially in rural and isolated communities. Support is needed for getting qualified teachers from outside New Zealand and having a smooth process for them in terms of visas and immigration.” – **Representative of Barnardos New Zealand**

Incentivise students to study ECE teaching qualifications

A few respondents commented that improved training or incentives to train unqualified staff would support services to operate with 80% or more qualified teachers.

“Help to educate the teacher. Make the teaching programme funded. Help the unqualified teacher working in the sector to educate and qualify. Financial support while studying or tax relaxation for teacher aspiring to study ECE.” – **Education and care teacher or educator**

“Support is needed to encourage people into doing it the proper ECE qualification, applying for scholarships for such and support throughout training to ensure teachers with best practice.” – **Hospital-based teacher or educator**

“Supporting people to get qualified- especially Māori colleagues who cannot financially afford to pay to complete studies. As well as a proper support system to help people to complete studies, such as mentor, classes, or lecturer to support students.” – **Hillcrest Childcare**

Should we regulate for 80%?

Not currently realistic

While respondents generally supported the objective to increase the proportion of qualified teachers, many felt that it is not a realistic regulation to be undertaken during the current teacher shortage.

“Due to shortage of teachers, low pay scales, Centres are already challenged with finding qualified and certified teachers. Cost of hiring relieving teachers who are certificated and qualified is very high. This also leaves a lot of burden on the permanent teachers with compliance, assessment, planning and running the curriculum (when working with relievers to meet the 80% regulations.” – **Education and care centre owner or manager**

“Meeting 80% at this time I believe is putting more pressure onto an already pressured industry. I believe the timing is unwise. This should be reconsidered.” – **Education and care centre owner or manager**

“Due to the shortage of ECE qualified teachers, please stay with 50 %.” – **Education and care centre owner or manager**

Improving education and care

Many respondents felt that regulating for 80% qualified teachers would improve the quality of provision.

“The more qualified carers, the better the learning environment will be as they would then know what rules and procedures need to be met.” – **Home-based teacher or educator**

“I’m absolutely all about quality ECE and having quality ECE requires employing people that have studied in education, more specifically ECE. There needs to be some provisions for times where we can’t staff at 80%.” – **Education and care centre owner or manager**

“Quality ECE should always be number 1. Consistency across New Zealand is important for teachers to be seen as professionals and quality ensured.” – **Anonymous teacher or educator**

“It’s the best option to provide consistent standards and best outcomes for tamariki.” – **Hospital-based teacher or educator**

Tamariki deserve qualified staff

Some respondents also highlighted that regulating for 80% would ensure better quality outcomes for tamariki.

“To ensure the best outcomes for the children. Clearly qualified teachers have undergone the training to ensure this.” – **Education and care centre owner or manager**

“ECE is a specialised profession...Until we take a stand and ensure that our profession is fully represented by people who have proven their capability and commitment to the profession, we will not increase the mana of the work and the importance of our future tamariki.” – **University ITE Provider**

“To put the children and whānau first and take advice from the research that says qualified staff in the main, lead to better quality outcomes for children and their families.” – **Kindergarten owner or manager, principal advisor at Auckland Kindergarten Association**

“Children deserve the best possible education and care.” – **Hospital-based teacher or educator**

Exemptions

There were also comments that a ‘one size fits all’ approach would not work. Respondents recommended some exemptions.

“If it is hard for some providers to meet the requirements then exempts and individualised programmes might be needed.” – **Parent of whānau of learner attending education and care**

“I do not know how manageable this would be at all times for all services - it is a quality indicator but when it is hard to find teachers because of undersupplying and/or over demand some services may close their doors which could impact participation for tamariki - more stress of whānau who have nowhere close for their child to go.” – **Kindergarten, Education and care centre owner or manager**

This was frequently mentioned by respondents affiliated with hospital-based services.

“Hospital based services should have more provisions or exemptions as they provide a different ongoing service to centre based.” – **Education and care centre owner or manager**

“As we are a hospital-based Service, we should be exempt based on our numbers and our notional role.” – **Hospital-based teacher or educator**

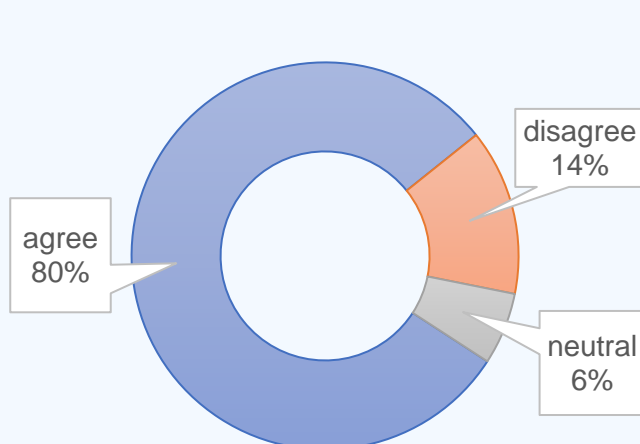
Strengthening the person responsible requirement in teacher-led centre-based services and hospital-based services

Proposal 1: Require the person responsible to hold a Category One or Two practicing certificate in teacher-led centre-based services and hospital-based services

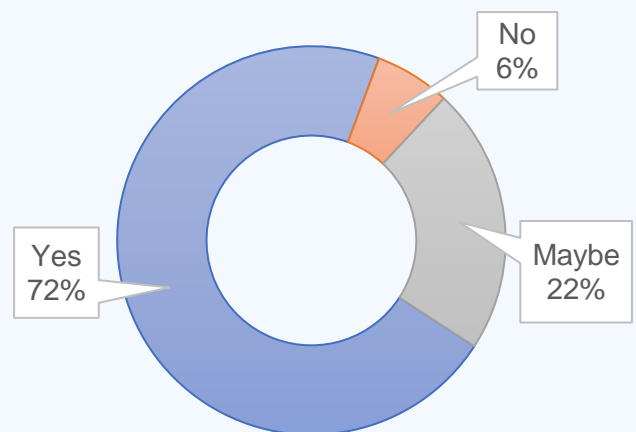
Explanatory text from the survey

We propose limiting persons responsible to teachers holding a Category One (*Tiwhikete Whakaakoranga Tūturu*) or Category Two (*Tiwhikete Whakaakoranga Pūmau*) [Full Practising Certificate](#). This change would ensure that teaching staff are supervised by experienced teachers, which could help with lifting pedagogy and improving child outcomes. It also enables graduate teachers and teachers recently returning to the profession to focus on teaching, without carrying extra responsibilities.

Question 1: Do you agree that the person responsible role should be limited to experienced teachers who hold a Category One or Two practising certificate?



Question 2: Would your service be able to comply with the person responsible requirement if they were required to hold a Category One or Two practising certificate?



Teacher supply

Several respondents stated that many services would struggle to meet the person responsible requirements citing a current teacher shortage.

“The availability of fully qualified teachers is more critical for smaller centres. For example, a Centre may be able to survive and be open with say 1 fully certified and 2 provisionally certified, but if the fully certified is away - then they cannot be open as [there is] no PR.” –

Education and care centre owner or manager

“The other point to consider is that with the teacher shortage, our experienced Category 1 and 2 staff would potentially be required to work long hours to cover this requirement, and this could lead to further burn out and more teachers leaving the sector.” – **Just Kidz Huapai**

“I agree with the proposals of the person responsible however I feel that the limitation on the person needing a category 1 or 2 practising certificate is not yet feasible with the current shortages.” – **Just Kidz Orakei**

Support for requiring persons responsible to hold a Category One or Two practicing certificate

Many respondents supported the proposal on the basis that it would improve children’s education and care.

“This connects to the expectations that are put in place for principles in school settings and ECE leaders (and/or person responsible) and is another dimension of conditional parity. Additionally, it would be supported by setting the qualification level to 80 (preferably 100%) qualified.” – **Tertiary Lecturer**

“I strongly agree with this. A first-year teacher being a person responsible is a lot of responsibility if they are in charge. The person has to be able to cope and manage any situation that comes up on site. They need to know processes and procedures and have the maturity to deal with often challenging situations.” – **Kindergarten teacher or educator**

“We support the Person Responsible position to be held by a teacher with some experience and a Category One (Tiwhikete Whakaakoranga Tūturu) Full Practising Certificate ideally should be the requirement, but we recognise that for some teachers a short time holding the Category Two (Tiwhikete Whakaakroanga Pūmau) while they regain their Tūturu would be acceptable. The Person Responsible role carries a lot of responsibility and should be held by someone with current knowledge and experience.” – **Kaitiaki Kindergartens**

Some respondents also thought that the person responsible should have experience working in ECE.

“A newly qualified teacher cannot support experienced teachers and lift the level of learning for the children. or support teachers to increase their knowledge and or skills. The need to be the person responsible needs experience.” – **Education and care centre owner or manager**

“Leadership comes with experience and experience comes with practice. Someone who has just begun in the profession needs to concentrate on gaining knowledge around practice/pedagogy not necessarily around management” – **Hospital-based owner or manager**

ECE experience

Some respondents felt it should be a requirement that the person responsible has ECE experience or training.

“I am not sure but become very concerned when I see new graduates in Person Responsible roles. These grads have had no mentoring or have not been given sufficient time to develop best practice and leadership roles.” – **Early Intervention Teacher, Learning Support**

“This should be an ECE registered teacher only as the person responsible.” – **University ITE provider**

“A person responsible should only be in this role after 2 years being full time employed in a ECE centre and should only be fully registered.” – **Puna Reo owner or manager**

Fully qualified and certificated teachers are not always best suited for the person responsible role

Some respondents commented that holding a Category One or Two practising certificate does not necessarily make someone suited to being the person responsible. Respondents often remarked that someone with significant experience would be a better fit for the person responsible role than someone who is qualified but has less ECE experience.

“We have a provisionally registered teacher who has been with us for up to 10 years in our ECE setting and who started her training in the past 4 years. She is now provisionally registered but has so much experience and knowledge in to the operational, programme and compliance side of things that she would make a great 'person responsible'.” –

Education and care centre owner or manager

“Some teachers have full practising certificates and others provisionally it all depends on the teacher. It doesn't always mean the one with the full practicing certificate have more knowledge or deeper insight...some are provisionally registered teacher new or returning are excellent leaders with great understanding and knowledge in pedagogy and improving child outcomes and taking on extra responsibility.” –

Kōhanga reo teacher or educator

“In principle, I agree with all proposals, yet the limitation on the person needing a category 1 or 2 practising certificate is not yet feasible with the shortages...The other valid thing to keep in mind here is that many staff, provisional staff have already had significant experience and are of an age and maturity to manage situations such as leadership or person responsible- this should be able to be ascertained by a person in a leadership position at the centre in good faith.” –

Just Kidz Huapai

Proposal 2: Clarifying the person responsible role in teacher-led centre-based services

Explanatory text from the survey

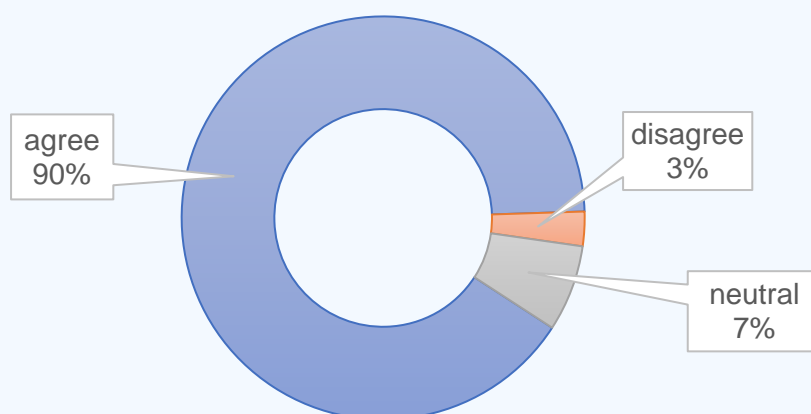
Persons responsible in teacher-led centres hold a number of important roles. They supervise children and staff and are directly involved in, and primarily responsible for, children's day-to-day education and care, comfort, health and safety.

The problem is that the Regulations and Licensing Criteria do not clearly articulate what these roles involve.

We propose strengthening the current person responsible requirement by clarifying that they are expected to:

- provide education and care to children in attendance and guidance to teaching staff
- ensure all staff are aware of gazetted curriculum framework and how to use it in their teaching
- ensure that health and safety risks and hazards are identified, and appropriate steps are taken to address those risks or hazards when children attend
- supervise children in attendance and staff providing education and care (even if located in separate spaces)

Question 1: Do you agree that we should clarify the person responsible functions and duties?



Further clarification required

Many respondents were satisfied with the clarifications outlined in the proposal.

“These are excellent recommendations.” – Tertiary Lecturer

“We fully support the four proposed changes to the regulations covering persons responsible in ECE centres.” – The Institute for Early Childhood Studies, Faculty of Education, Te Herenga Waka Victoria University of Wellington

“This will allow for the professional requirement to be reached in the quality journey that needs to happen.” – Education and care centre owner or manager

However, several respondents thought that the person responsible requirement as a whole requires further clarification.

“Nothing to add except in support of this proposal as the rules are too confusing and ambiguous as they are. All rules need to be clear so there is no confusion as to what is required. If they are not clear to us in the field, they are not clear enough.” – Education and care centre owner or manager

“We think that each of the four responsibilities needs to be clarified further. For example, what does “provide education and care” and “supervise children” actually mean in reality. I think that the list of responsibilities looks more like the managers/supervisors or even team leader (of a big team) role.” – Education and care centre owner or manager

Supervision

A few respondents felt that some supervision-based requirements seem difficult. Although it is already a requirement, respondents were particularly concerned with the logistics of supervision in services that have children in separate rooms.

“The requirement that persons responsible supervise children in attendance and staff providing education and care (even if located in separate spaces) seems difficult, when many services have children in separate spaces permanently, e.g., a toddlers room and a babies room.” – Education and care centre owner or manager and teacher

“Your comment “supervise children in attendance and staff providing education and care (even if located in separate spaces)” is a worry as we have quite different areas to be in so any person in charge and working in another room is not necessarily aware of what is going on next door. Each room needs a person responsible.” – Parent or whānau of a learner attending Kōhanga reo

“How can a person responsible supervise staff and children in attendance if they are in separate spaces? The person responsible could change day to day depending on leave or working days required.” – Education and care centre owner or manager

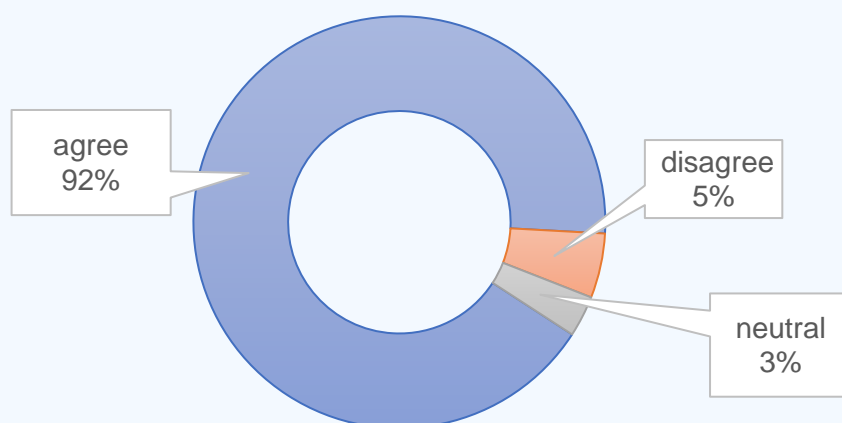
Proposal 3: The person responsible in teacher-led centre-based services must hold a first aid qualification

Explanatory text from the survey

There must be at least one adult present with a first aid qualification (or equivalent) for every 25 children present in a teacher-led centre-based service, but persons responsible do not need to hold this qualification.

We propose requiring persons responsible to hold a current first aid qualification. This training should prepare them with the skills and knowledge needed to respond effectively to incidents.

Question 1: Do you agree that the person responsible should hold a first aid qualification?



All teaching staff should have a first aid qualification

Most respondents commented that all teaching staff should have some form of first aid training, not just the person responsible.

“More than one teacher should hold a First Aid qualification. I believe all teachers should have a first aid Certificate.” – **Hospital-based teacher or educator**

Many respondents also noted that their services already require the person responsible to have first aid qualifications.

“As a kindergarten association we require all our teachers to hold a current first aid qualification, so we consider this absolutely essential. It was pleasing to see the ratio of staff with current first aid qualifications reduced to 1 for every 25 children, however, this is still too large a ratio. The person responsible has ‘responsibilities’ and one of those should be to be able to respond to incidents in an emergency and support staff who may be first on the scene. – **Kaitiaki Kindergartens**

“As a kindergarten associate that requires all teaching staff to hold a first aid qualification, we believe that the proposal that the person responsible in teacher-led centres must hold a first aid qualification is totally inadequate. We believe that all adults counted for ratio purposes should be holders of a first aid qualification regardless of their employment status i.e., part time/full time, permanent, relieving.” – **Kidsfirst Kindergartens Middleton**

“We have ALL our teachers train for first aid and regularly retrain every two years. We want our tamariki safe at all times with all our kaiako.” – **Education and care centre owner or manager and teacher**

Portion of staff should have first aid training

A few respondents agreed with having staff first aid trained, however felt it should only be a requirement for the person responsible or a portion of staff (not necessarily the person responsible).

“I think 50% of staff on site should hold a first aid certificate (qualified and unqualified).” – **Education and care centre owner or manager**

“As long as the right number of people across the centre have the right First Aid qualification why try and make it so that the PR has to have one? This makes rostering staff a complete nightmare, ensuring someone with a qualification outside teaching is always in the right place at the right time.” – **Education and care centre owner or manager**

“It should remain that a high number of staff need first aid - however I don't specifically see the difference between a support teacher having it and the person responsible - if they're in the same room. One adult on the floor must hold a first aid cert at all times.” – **Education and care centre owner or manager**

Hospital-based services

While the proposal deals with the person responsible in teacher-led centre-based services holding a first aid qualification, several respondents queried whether a first aid qualification would be necessary in hospital-based services.

“In a hospital-based service, all hospitals have an expectation that there is certain health and safety training that is carried out by all staff (CPR, fire, etc). With the presence of nurses and doctors around in the units at all times, it would be helpful if hospital-based services within a healthcare setting have exemptions.” – **Hospital-based owner or manager**

“I don't view this as necessary in the hospital setting as we are surrounded by health professionals who attend to children's health needs. Nevertheless, I see it as a bonus to personally have a first aid qualification. We currently have CPR as mandatory training.” – **Hospital-based teacher or educator**

“Please specify whether this would need to be an outside provider or can this be the Basic Life support that we are required to complete as a hospital employee.” – **Hospital-based teacher or educator**

Child protection and safeguarding

A few respondents noted that all staff should have regular child protection and safeguarding training.

“In terms of other qualifications, it would be good if the person responsible has regularly completed some form of child protection training (similar time frames to the first aid requirement). As the Ministry has this training available on its LMS, this would be easy to do.” – **Te Rito Maioha Early Childhood New Zealand**

“It is vital that this person and all staff have regular child protection and child safeguarding training in the same way that first aid training has to be gained and repeated.” – **Anonymous child protection and safeguarding organisation**

Proposal 4: Clarifying the person responsible role in hospital-based services

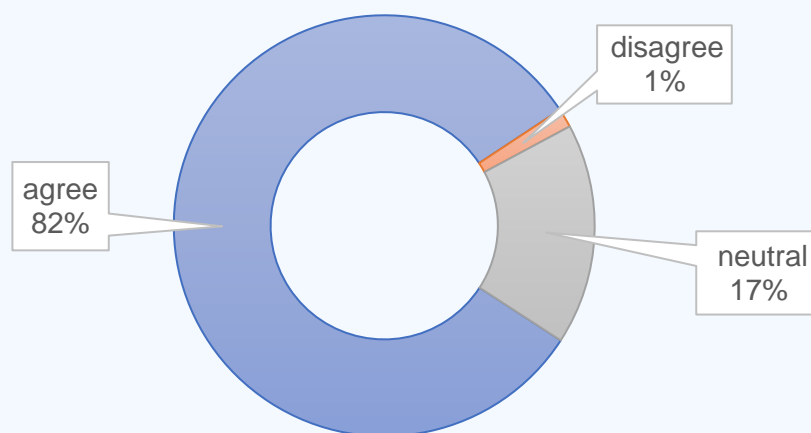
Explanatory text from the survey

There is limited guidance in the Regulations and Licensing Criteria about what it means to be primarily responsible for children's education. We suggest more clearly explaining what is meant by this responsibility. There are also inconsistent supervision requirements set out in the Regulations for persons responsible.

We propose amending the person responsible requirement for hospital-based services to clarify that persons responsible are expected to:

- ensure all staff are aware of the gazetted curriculum framework and how to use it
- provide education and care to children and guidance to teaching staff
- ensure there is at least one adult present when children are in the activity room
- supervise children and staff at the service, and adults in the activity room (even when children and staff are located in separate spaces).

Question 1: Do you agree that we should clarify the person responsible functions and duties for hospital-based services as described in this proposal?



Positive feedback

Respondents felt that having these requirements outlined in the proposal would help to support the functions of services.

“As a small service we don't have a designated Team leader I believe this process will help with this.” – **Hospital-based teacher or educator**

“This seems sensible and consistent with the kaupapa of this initiative.” – **Education and care centre owner or manager**

“This would be good to know that the person responsible functions and duties would be able to give an update to his/her teaching staff with the latest within the ECE world.” – **Hospital-based teacher or educator**

Further clarification

Similar to proposal 2, some respondents thought that the person responsible role requires further clarification.

“Again, the clarification of what is actually meant by 'provide educational and care to children in attendance' - what does this mean in practice?” – **Education and care centre owner or manager**

“All references to staff need to be to “teaching staff” so other hospital staff aren't inadvertently included.” - **Te Rito Maioha Early Childhood New Zealand**

“It would be more beneficial to clarify that the hospital-based person responsible complies with District Health board H&S requirements.” – **Hospital-based teacher or educator**

Respondents particularly made this comment in relation to supervision and separate spaces.

“We felt that there needed to be a bit more discussion/clarification around supervising children “even when located in separate spaces”.” – **Hospital Play Specialist Association of Aotearoa New Zealand**

“Item 4 needs consultation with hospital-based services, and clarification.” – **OMEP (World Early Childhood Organisation) Aotearoa New Zealand**

“Regarding supervising adults in the activity room – would the person responsible also be responsible for supervising any parents present?” – **Te Rito Maioha Early Childhood New Zealand**

Should be like teacher-led centres

Some respondents thought that the criteria for hospital-based services should be consistent with teacher-led centres.

“They are no different from other teacher-led Centres and should meet similar criteria if they are eligible for the same funding band!” – **Education and care centre owner or manager**

“I feel that anyone providing a service to care for children should have to follow the ECE regulations.” – **Education and care centre owner or manager**

“If hospital-based services receive the same funding as ECE centres, then they regulations should be the same for all. If not possible to have same regulations, then the funding rates, or the way Hospital-based services are funded should be different to reflect the difference way they operate.” – **Education and care centre owner or manager**

Additional comments

At the end of the survey, respondents were given the opportunity to provide any additional comments that they may have. The categories below represent the topics which appeared most frequently in these responses.

Positive feedback

Many respondents shared their support of regulating for 80% qualified teachers and strengthening the person responsible requirement.

“Please keep our industry reputation and quality improving by actively working towards 100% now. To do this, 80% HAS to happen asap first.” – **Education and care centre owner or manager**

“I am pleased to see a strengthening in the expectation of the commitment to quality education and that when legislated this will support the best practice who those that are most vulnerable in society.” – **Hospital-based service owner or manager**

A few respondents also commented on the level of skill in management. They noted that experience and qualifications within centre management could ensure higher quality performance in centres.

“It is important to ensure quality is upheld, the lack of professionalism and experience in people responsible for a centre has decreased over the years. It should always be paramount that teachers are upskilling and ensuring quality of their professional practice.” – **Early learning teacher or educator**

“Perhaps tightening up the requirements for managers might be more effective in improving the quality of supervision in centres.” – **Education and care service owner, manager and teacher**

Teacher shortage

Respondents reiterated their support of employing more ECE qualified teachers but emphasised the difficulty they would have meeting the 80% standard because of tight teacher supply.

“I would love to employ 100% ECE qualified, certificated teachers. But there is a massive shortage of these people, and something needs to be done in the interim to assist us until this has improved. Making regulation changes that put more pressure on us meeting compliance is not at all helpful at the moment. Please be considerate of the enormous stress the small, family-owned centres are under.” – **Education and care centre owner or manager**

“In a sector that is currently facing struggles to recruit, these proposals would put even greater pressure on centre managers.” – **Education and care centre owner or manager**

“I absolutely believe in and agree that the sector needs to ensure quality centres and learning programs for children but please keep in mind that we are operating in a sector with teachers who feel under paid, undervalued, there are massive shortages of qualified, registered teachers and relievers. The stress on managers to maintain ratios, requirements and cover leave/sick leave is massive.” – **Twinkle Twinkle**

Further improvements

Some respondents took this opportunity to raise other areas within the sector that they felt need attention. Respondents particularly mentioned improvements to funding, with the note that this could aid in the employment of qualified teachers.

“Current funding levels are such that we are all struggling to make ends meet, this means employing good teachers and paying them adequately can be very difficult.” – **Kindergarten owner or manager**

“The Ministry of Education needs to have a structured financial statement detailing expenditure of the bulk fund to show that it is actually going to payment of teachers' salaries. There needs to be design of a fool proof financial document that ensures that bulk funding goes to provision of the EC teaching services.” – **OMEP (World Early Childhood Organisation) Aotearoa New Zealand**

Other respondents commented on pay parity or that ECE teachers should be paid the as primary teachers.

“I believe that we could better achieve quality by funding for non-contact so that we can raise the hours from 2 to 4 hours per week of non-contact, ensuring pay parity funding is aligned with the future steps that teachers will be moving to and providing for better ratios i.e., 1:8 over 2s and 1:4 under 2s.” – **Twinkle Twinkle**

“We need more qualified ECE teachers that are trained in NZ. Along with this we need pay parity where ECE services are able to opt into the kindergarten funding rates, so that this can be achieved.” – **Education and care centre owner or manager**

“ECE teachers must be paid the same as Primary teachers. The two-tiered system is unjust.” – **Education and care teacher or educator**

A few respondents also commented on ratio requirements.

“Improve the minimum ratio requirements.” – **Education and care teacher or educator**

Support for Māori and Pacific services

A few respondents also raised queries or suggestions on how the Ministry can help support Māori and Pacific services and learners.

“How can we support our Pacifica centres who are working to keep the language and culture of their children strong if the only thing we value in our kaiako is a formal qualification? Some allowance is required for the language speakers who are vital for this.” – **Education and care centre owner or manager**

“1. Set up a one-year ECE degree course for fluent Māori language speakers.

2. Provide scholarships for fluent Māori language speakers who wish to enrol in a ECE degree course.

3. Establish a Kaupapa Māori ECE degree course.” – **Te Puna Reo owner or manager**



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kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**