



Consultation report: Summary of feedback from public consultation on regulations for home-based educator qualifications

February 2022

Contents

Introduction.....	1
Review of the Early Learning Regulatory System	1
Consultation and submissions	1
Online submissions via the survey	2
Written submissions.....	5
Survey responses.....	7
Proposal 1: What qualifications would be required.....	8
Proposal 2: How the percentages of qualified educators would be calculated.....	12
Proposal 3: How these changes affect the quality rate requirements	16
Proposal 4: Record keeping for services.....	19
Additional comments	21

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 three 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 one set of proposals from tranche two of the Review – regulations for home-based educator qualifications.

Consultation and submissions

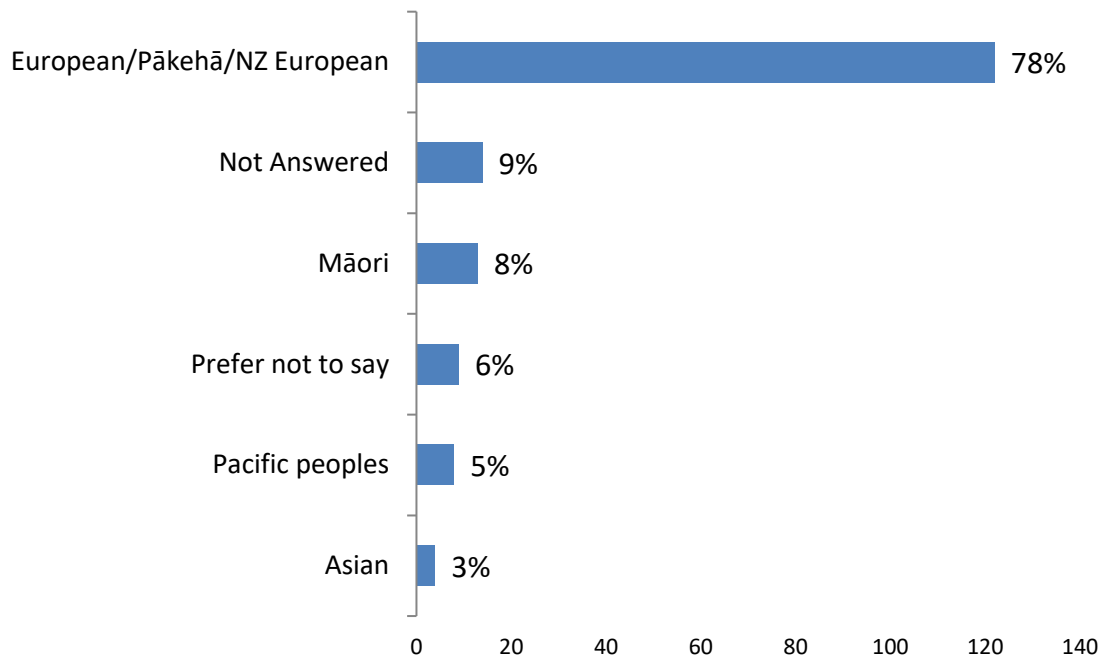
On 27 August 2021, a discussion document was released outlining options and proposals to regulate for home-based educator qualifications. Respondents could provide feedback by completing an online survey or by emailing a written submission. Consultation closed on 27 September 2021.

Online submissions via the survey

The online survey received 156 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

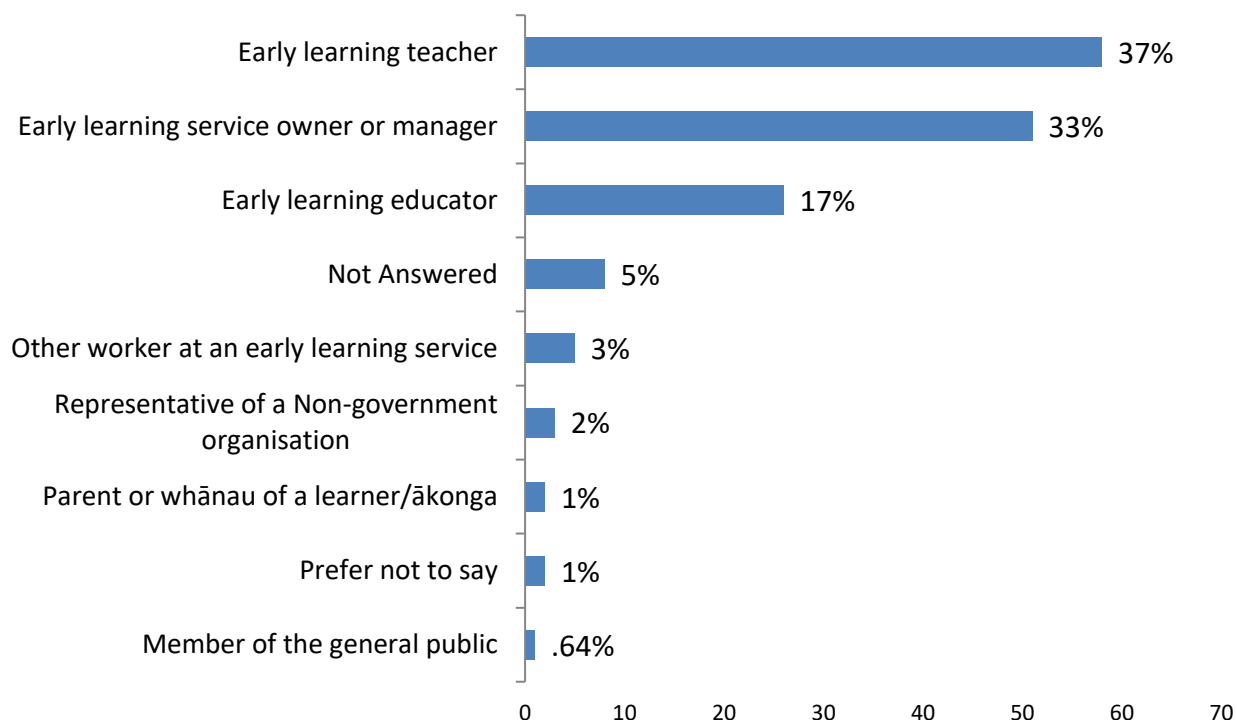
Survey respondents were asked to select the ethnicity or ethnicities that best described them*. Most respondents were European/Pākehā/NZ European (78%), with the second-largest population group being Māori (8%).



*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.

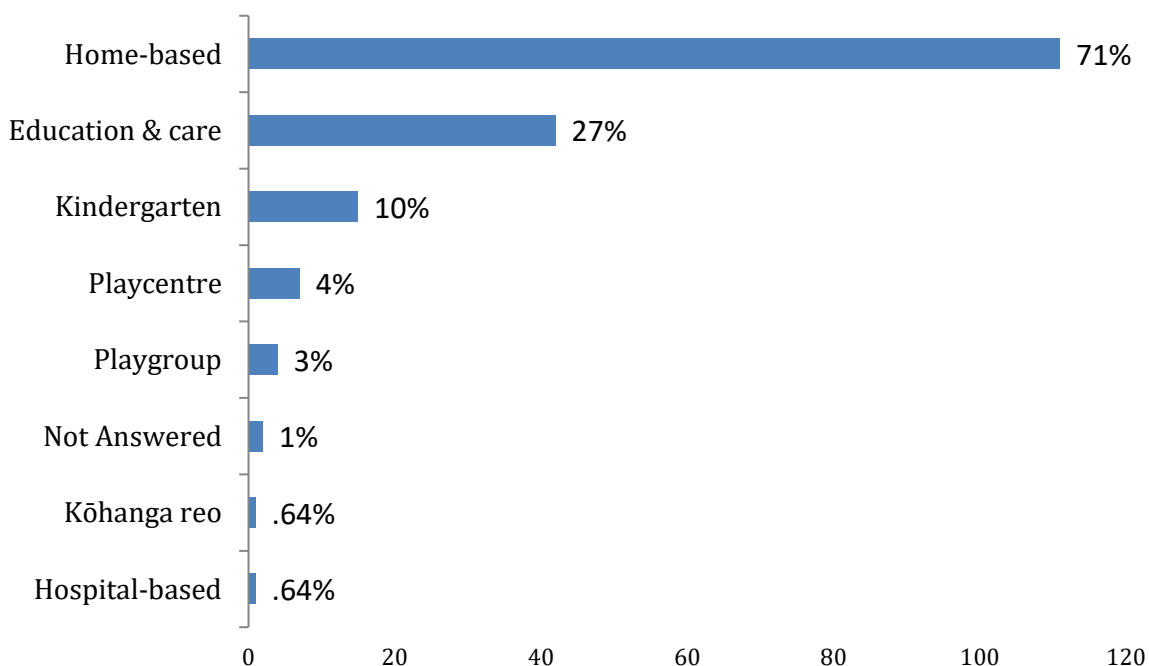
Stakeholder group

Survey respondents were asked to select the category that best described their connection to the sector. Most respondents consisted of early learning teachers or educators (54%) and early learning service owners or managers (33%). 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.



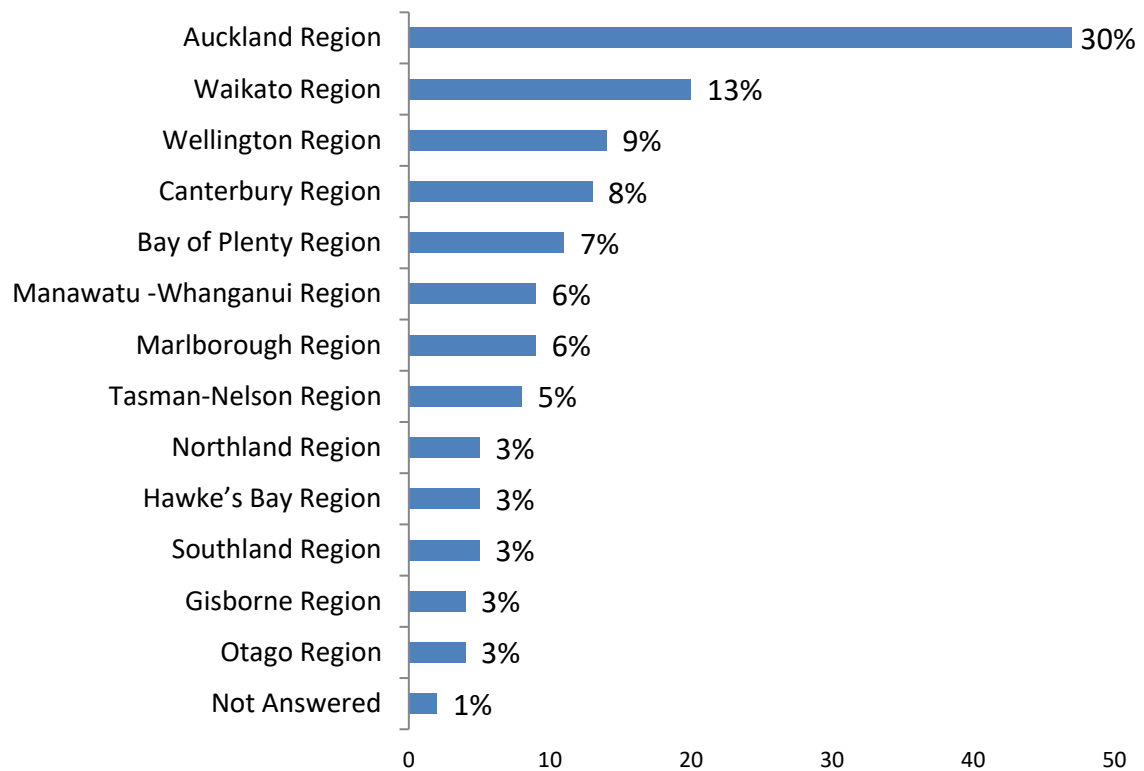
Type of early learning service

Survey respondents were asked which service type they were associated with. They were largely associated with home-based services (71%) and education & care (27%). Respondents were able to select multiple categories for this question.



Region

Regional data was also collected. Auckland, Waikato, and Wellington comprised 52% of all respondents.



Written submissions

We received 10 detailed written submissions via email from the organisations listed below.

Organisation

1. Te Rito Maioha Early Childhood New Zealand
2. Little Magpies Childcare Services Ltd
3. Nurture Nannies & Home-based Childcare
4. Barnardos Early Learning
5. Open Polytechnic Kuratini Tuwhera
6. PAUA (Pre-schoolers At-home Uniquely Achieving) Early Childhood Home Based Care Service
7. Rockmybaby Group
8. Nurture me – Learning at Home
9. Starting Line Homebased Childcare
10. Amanda's Home Based Early Childhood Care and Education

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'.

A free-text box was also available for each proposal. This allowed respondents to provide written responses to each proposal. One question, concerning record keeping for services, also had a question where respondents had the option to select 'yes' or 'no'.

Survey participants did not need to answer every question. Where questions were unanswered these were excluded from the denominator. For example, if 106 people agreed to the question and there were 142 responses to the question, this would be recorded as 75% agreement rather than the total number survey participants (156), which would equate to 68%.

Proposal 1: What qualifications would be required

Explanatory text from the survey

Following the Review of Home-based ECE, Government agreed to recognise the following qualifications:

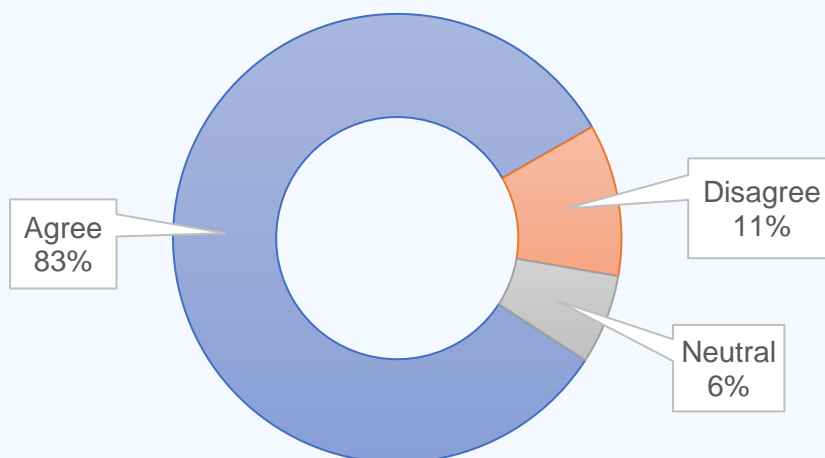
- a Level 4 or higher ECE qualification
- a Level 3 ECE qualification completed prior to 1 January 2022
- Te Ara Tuarua (the level 5 kōhanga reo qualification) or higher
- a primary teaching qualification.

We propose the qualifications would also have to be listed on the New Zealand Qualifications Framework (NZQF) or recognised by the Teaching Council. This is to ensure the qualifications are quality assured and relevant to teaching in New Zealand.

Proposed changes for recognised qualifications in the draft regulations:

4	Regulation 3 amended (Interpretation)
(1)	<p>In regulation 3, insert in their appropriate alphabetical order:</p> <p>home-based service qualification means, for the purposes of regulation 44(1)(a)(i) and Schedule 1A,—</p> <p>(a) for a person responsible at a licensed home-based education and care service, an early childhood teaching qualification recognised by the Teaching Council of Aotearoa New Zealand for registration purposes:</p> <p>(b) for an educator at a licensed home-based education and care service, any of the following qualifications:</p> <p>(i) an early childhood education qualification that is—</p> <p>(A) at Level 4 or above of the Qualifications Framework; or</p> <p>(B) recognised by the Teaching Council of Aotearoa New Zealand for registration purposes:</p> <p>(ii) an early childhood education qualification at Level 3 of the Qualifications Framework, completed prior to 1 January 2022:</p> <p>(iii) a qualification developed by Te Kōhanga Reo National Trust Board at Level 5 or above of the Qualifications Framework:</p> <p>(iv) a primary teaching qualification that is—</p> <p>(A) listed in the Qualifications Framework; or</p> <p>(B) recognised by the Teaching Council of Aotearoa New Zealand for registration purposes</p> <p>Qualifications Framework has the same meaning as in section 10(1) of the Act</p>

Question 1: Do you agree the proposed regulations clearly capture what types of qualifications educators would need to hold to be considered qualified?



Questions qualification level or completion status

While most respondents agreed with the proposal, many had further queries or comments. Some of these included comments on further training or acknowledgment of other qualifications.

“I do feel primary trained teachers need additional proof of their knowledge of under 5-year-olds development.” – **Home-based visiting teacher**

“We are from a small home-based service in Auckland and have a number of educators at different stages of study/enrolment. We would like to see a grace period implemented for those already in study whose practicum component of study has been impacted by the level 4 lockdown.” – **Nurture Me - Learning at home**

“The proposed regulation changes clearly state the qualifications required by Educators. However, the proposed changes are very prescriptive of qualifications, and do not take into account the home-based sector’s role in both nurturing children and growing Educators. The mandated qualifications do not include Educators who are partway through their degree in ECE, or those who have a full degree from Australia.” – **PAUA**

Several respondents thought that some aspects of the recognised qualifications are insufficient. Respondents that disagreed with the proposal were all associated with either home-based, education and care services, or kindergarten.

“I have just finished level 4 ECE through NZ open polytechnic and believe that previous level 3 or 4 qualifications did not go into the same depth as what NZ open polytechnic course was.” – **Home-based educator**

“Qualified in ECE is a level 7 diploma or degree in ECE, nothing less. This is just downplaying actual ECE qualified teachers and their worth.” – **Education and care teacher**

“I totally agree that educators need to have some kind of qualification in ECE in order to do their roles to the best they can. However, a Level 3 is more appropriate as a platform for study.” – **Home-based service owner or manager**

Some respondents, all associated with home-based services, were concerned that these changes could disadvantage older educators or educators who have English as a second language.

"I feel this will disadvantage networks with ESOL members or older carers who don't want to return to study, but I like having a more knowledgeable industry overall." – **Home-based educator**

"We have a number of Educators that have English as a second Language (ESOL) Requiring them to achieve a Level 4 ECE Qualification is very overwhelming for them." – **Home-based teacher**

"It would be really hard to get older educators who have been doing this for 20 odd years and who are over 55 to study. What leeway is there for them with so much experience?" – **Home-based service owner or manager**

While not a view shared by many, it was raised that home-based educators should not need to be qualified.

"I don't believe an in-home carer needs to be qualified. Families choose in home care as they want a more personal experience and more one on one for their children." – **Home-based carer**

Supportive comments

Many respondents shared their support of the recognised qualifications.

"Educators are better equipped to deal with the responsibilities and requirements of the role when they have completed a course and strengthens the quality of their care." – **Home-based visiting teacher**

"I strongly agree with the need for qualifications. However, I also see the need for a space where people without qualifications are regulated and supported to provide safe Home Based ECE." – **Kindergarten, home-based and playgroup manager**

"I understand the need to see homebased educators holding some sort of qualification, as it gives them professional knowledge, a sense of achievement (in many instances) and seen in the public as having some professional knowledge of care and education." – **Home-based visiting teacher**

Questions timing

Several respondents raised issues with the 1 January 2022 completion date for level 3 ECE qualifications, particularly factoring in the impacts COVID-19 has had on the sector.

"However due to Lockdown Educators are unable to complete their hours with children for study. Because targets will not be met by the date line services will be forced to close and who will help support the families." – **Home-based visiting teacher**

"We agree that the proposed regulations generally capture the types of qualifications educators need to hold to be considered qualified but believe that the impact of Covid-19 must be taken into account in the timeline, particularly for those working towards completing ECE level 3 prior to 1 January 2022... We strongly recommend this date is extended by one year, to 1 January 2023." – **Open Polytechnic Kuratini Tuwhera**

"I don't think it is realistic to expect educators to have completed a level 3 certificate by January next year." – **Home-based service owner or manager**

Improve training of educators

Over 15 respondents associated with home-based services noted it would be important to improve to the training of educators and accessibility to such training. In particular, for educators who have lower qualifications or no qualifications.

"We need more free ECE qualification course for educators, especially online courses." – **Home-based service owner or manager**

"Some or most of the educators that come to home-based have little education or prior knowledge about early childhood education. To motivate these educators to do some form of studies takes a lot of 'talanoa' and empowerment. It is a big step for educators and fear of failure is a factor. A basic introduction to ECE will be good and may be delivered to educators, especially in the Pacific communities, in their own language for understanding, although the contents will be in English." – **Home-based service owner or manager**

Questions necessity of regulatory changes

Although not affiliated with a home-based service, two respondents commented that tightening requirements around educator qualifications neglects to recognise parental choice and the value of educators who may be less qualified but have substantial experience.

“Home-based services will lessen with more and more criteria. This will add to the waiting lists. Let the parents decide for themselves if the service and person who is looking after their child is who they are looking for. This normally does not pertain to their education but to who is available and a caring person.” –

Kindergarten teacher

“I do not support these regulatory changes as they do not take into account the years of accumulated life experience that unqualified educators may have. Wisdom learnt from life experience is much more valuable than a qualification which can just be awarded as a result for completing an academic, box-ticking exercise without the same degree of worthwhile experience that many long-serving unqualified educators have.” – **Kindergarten and playcentre teacher**

Proposal 2: How the percentages of qualified educators would be calculated

Explanatory text from the survey

We are proposing the minimum, regulated percentages will be calculated every week based on a headcount of educators providing education and care. A headcount means each educator only counts once per service, regardless of hours worked or children cared for. The approach is designed to be simple to follow and align with the general principle that regulatory requirements must be met at all times.

The proposed regulations also set out that:

- educators must be working to be counted towards the percentage qualification requirements for a service on a full licence.
- educators planning to work for a service on a probationary licence can be counted, but once the service is licensed they will be expected to meet the percentage requirements according to the usual calculations.

Proposed changes for percentages and their calculation in the draft regulations:

6	Regulation 44 amended (Qualifications, ratios, and service-size standard:general)
(1)	Replace regulation 44(1)(a) with: (a) to comply with,— (i) for licensed home-based education and care services, the applicable requirements of Schedule 1A (which relates to qualification requirements for persons responsible at, and educators working at, home-based education and care services); or (ii) for every other licensed service provider to whom this regulation applies, the applicable requirements of Schedule 1 (which relates to qualification requirements for adults working in early childhood education and care centres or hospital-based education and care services); and
(2)	After regulation 44(3), insert:
(3A)	For the purposes of applying the percentage-based requirements in Schedule 1A,— (a) for every licensed home-based education and care service, percentages are assessed on a week-by-week basis (for the period from Monday to Sunday): (b) in any given week, educators can only count towards the required percentage if they provide a home-based education and care service in that week (for the period from Monday to Sunday): (c) in any given week, educators can only count toward the first licence of a service provider that they work for in that week (the period from Monday to Sunday): (d) for the purpose of calculating percentages to determine compliance with regulation 11(1)(a), paragraph (b) does not apply: (e) if the application of this schedule results in a number of educators who must hold a home-based service qualification that is less than a whole number, the number must be rounded up to the next whole number.

8

New Schedule 1A inserted

After Schedule 1, insert Schedule 1A set out in the Schedule of these regulations.

Schedule 1A**Qualification requirements: home-based education and care services r44(1)(a)****Applicable dates****Requirement**

From 1 January 2022

Person responsible must hold home-based service qualification and practising certificate

From 1 January 2022

Ten percent of educators must hold home-based service qualification

From 1 January 2023

Thirty percent of educators must hold home-based service qualification

From 1 January 2024

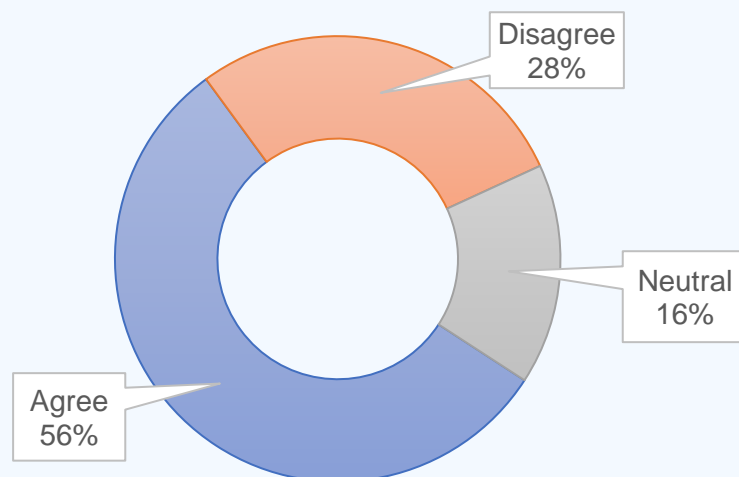
Sixty percent of educators must hold home-based service qualification

From 1 January 2025

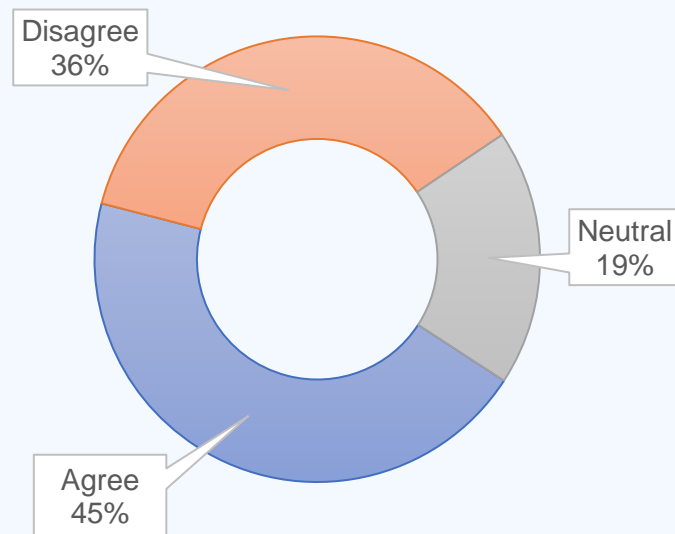
Eighty percent of educators must hold home-based service qualification

From 1 January 2025

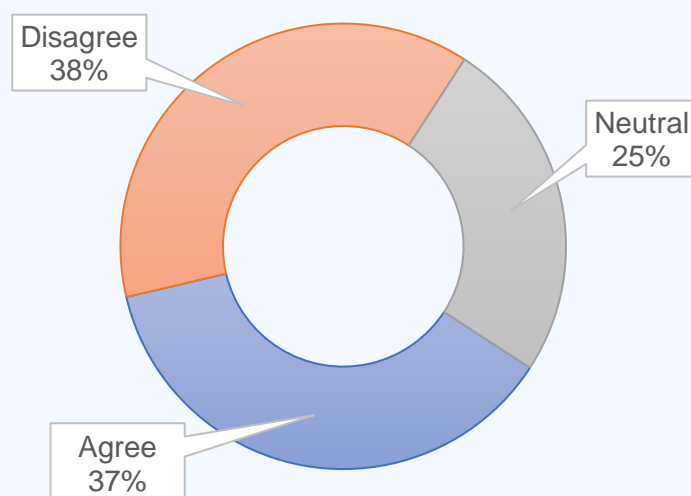
Within 6 months of joining a licensed home-based education and care service, educators without a home-based service qualification must be enrolled in a course offering a home-based service qualification and must complete the qualification within 2 years of enrolment.

Question 1: Do you agree the proposed headcount approach should be used to count educators?

Question 2: Do you agree applying the approach week-by-week is a workable approach to measure and maintain the percentage requirements?



Question 3: For educators planning to work on a probationary licence when it is first applied for, do you agree they should still be counted when they are not yet providing education and care?



Questions weekly approach

Many respondents raised that the weekly headcount approach could be overly burdensome and may be unworkable, particularly for smaller services. Most respondents who selected disagree for question 1, also selected disagree for questions 2 and 3.

“Having a week-by-week approach is time consuming and can disadvantage smaller networks. Percentages in a smaller network can be negatively affected if an Educator is on leave for more than three weeks. We recommend a monthly approach.” –

Barnardos Early Learning

“The week-by-week approach to measure and maintain the percentage requirements is certainly not workable. It is impossible, highly impractical and unrealistic for us.” – **Nurture Nannies**

Some respondents are concerned that the week-by-week approach does not account for situations where educators are available to work, but children are absent, either due to illness, school holidays (especially over the Christmas period), or the closure of services due to COVID-19 lockdowns.

“By applying the approach week by week not only creates more workload for visiting teachers but also doesn't account if educators lose care or go on holiday or children or their care children going on holiday.” – **Home-based visiting teacher**

Respondents also showed concern that services could become non-compliant if too many of their qualified educators take the same week off.

“The application of a week-by-week approach to measure and maintain the percentage requirements is not workable and will create a large amount of work for current providers that are already under pressure. Homebased educators are self-employed contractors, which means service providers cannot dictate when they take leave and for how long.” – **Rockmybaby Group**

COVID-19 Impact

Some respondents were also concerned as to how the impacts of COVID-19 would be factored into the weekly headcount. All of these respondents were associated with home-based services, and almost all disagreed with questions 1 and 2.

“Educators may then also be forced into positions where they feel unable to take leave due to the qualification requirements, which would not be good for their overall health, wellbeing and job satisfaction. In light of the current situation with COVID-19 and alert level restrictions, delays on returning to care arrangements for both educators and children following lockdown scenarios could also impact on this.” – **Home-based organisation**

“Children may be away sick and, given the requirements under COVID to not attend care if feeling unwell, then the impact of services meeting this proposed regulation is unfair. On this page there is no explanation as to the impact this proposed regulation will have on services.” – **Home-based service owner or manager**

Questions percentages

Some respondents thought that the minimum, regulated percentages could be difficult to manage in some cases. Some respondents disagreed with how percentages are calculated.

“This will be really hard for smaller providers. It could mean bringing on one untrained educator would put you out of the percentage bracket you need to qualify. How would that help smaller provider trying to grow?” – **Home-based service owner or manager**

“What happens when educators are sick, and it puts you under the 80% or Educators go away on holiday, and it pushes you below the percentage?” – **Home-based visiting teacher**

“The percentages and formulas used to calculate the headcount of Educators is rounded down. This is not a fair system. Instead, the actual percentage could be used instead. This would be a fairer way to fund according to the headcount.” – **Home-based visiting teacher**

Proposal 3: How these changes affect the quality rate requirements

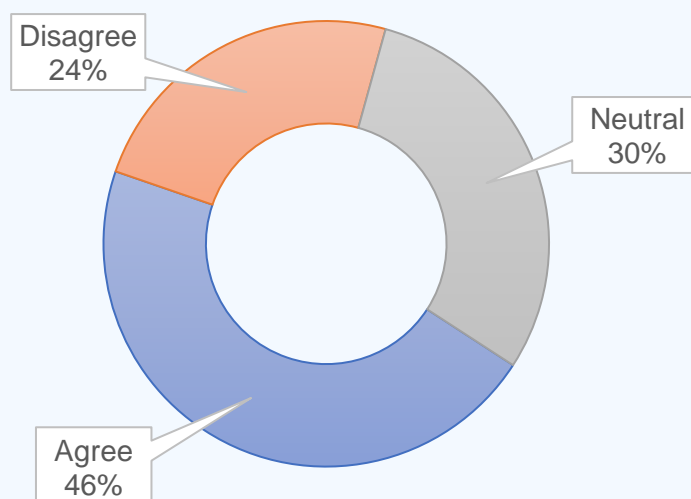
Explanatory text from the survey

We are not consulting on the quality rate requirements already introduced through the Funding Handbook in January 2021. However, we have developed questions that seek your views on the differences between the draft regulations and the quality rate to understand how they could be made more consistent.

From 1 January 2025, only the regulatory requirements will remain – the separate quality rate requirements in the ECE Funding Handbook will expire.

The quality rate adds some discretion for services not to meet the relevant percentage for up to five weeks in a four-month funding period. We think it might be confusing to have to deal with two sets of rules. You can read more about these different elements of the quality rate requirements in the ECE Funding Handbook.

Question 1: Do you agree having two different approaches for the standard and quality rates is workable up until the rates 'merge' in 2025?



Prefer quality approach

Many respondents indicated a preference for the quality approach, on the grounds that it offers more flexibility and discretion for services.

“Quality rate approach as it takes into consideration the qualifications of the educators and also if the new educators being prepared to take up ECE study.” – **Home-based service owner or manager**

“I agree with only one quality approach to measure the quality of the license, as firstly two different approaches will impose the work pressure for both service and funding

department.” – **Home-based service owner or manager**

“We prefer the discretion that is provided for the quality rate services around qualifications whereby the Funding Handbook states that a quality-funded service can access, without requesting Ministry approval, 5 discretionary situations (e.g., 5 weeks) in a funding period where percentage qualification requirements have not been met. [This] will mean that there is greater flexibility and discretion around meeting percentages of qualified educators while also making it less confusing for providers as there is essentially ‘one set of

rules', or one approach." – **New Zealand Home Based Childcare Association**

Prefer standard approach

Other respondents preferred the standard approach, finding it more straight-forward.

"It is messy to integrate the standard into the quality and maintain percentage for both at the same time. It would be easier for both to apply the same rate of change for the Standard network. This is based on many in the quality network that now have to complete the level 4. I had to push through 7 of my 12 last year in order to meet percentage requirements." – **Home-based visiting teacher**

"Rockmybaby disagree that there should be two different approaches for the standard and quality rates. We believe the discretion that is provided for the quality rate services around qualifications whereby the Funding Handbook states that a quality funded service can access, without requesting Ministry approval, 5 discretionary situations (e.g., 5 weeks) in a funding period where percentage qualification requirements have not been met." – **Rockmybaby Group**

"Would rather leave as is, no change." – **Home-based educator**

Supportive comments

Several respondents were supportive of having the two approaches and commented that it would be workable.

"We think that having two different approaches for standard and quality funding until 80% is reached is workable and provides an incentive for home-based providers to increase the percentage of qualified educators." – **Te Rito Maioha Early Childhood New Zealand**

"Both rates are workable up until the merge - then when the merge happens in 2025, the quality rate mechanisms should continue to be used. This would allow for partially trained Educators, the five discretionary weeks and the three weeks inactive." – **Other worker at a home-based service**

Two approaches too complicated

Other respondents noted that having two approaches could cause some confusion. Often, these respondents did not indicate a preferred approach, but disagreed with the proposal.

"We are feeling very vulnerable and disappointed about the second wave of reform of the escalating percentage of standard license. I believe two different approaches will be complicated and confusing for your end, as well as imposing piled up stress on our workload which has already stretched our limit and made our life and work imbalanced. This reform will get rid of any passionate ECE workers out of the market due to the financial difficulty, shortage of eligible families and heavy documentation. I believe if people are really enthusiastic working in this sector, we will endeavour to catch up with the eventual quality license in the year of 2025." – **Starting Line Homebased Childcare**

"Having 2 approaches is just too confusing, go with the approach from 2025." – **Home-based visiting teacher**

"Give one set with clear guidelines - it doesn't matter which but stick to the same one. The sector already has too much confusion." – **Education and care service owner or manager**

COVID-19 Impact

Although not commented on by many in this section, it was raised that COVID-19 has had an impact on some services' ability to operate at the relevant percentage.

"Due to the impact of Covid, the eligible families are dramatically decreasing irrespective of with or without qualification. Potentially it has already imposed the financial pressure on operating standard license where to require the escalating percentage of the standard license which potentially gets rid of the beginners like us really eager to aim for the

high quality but won't survive eventually due to the financial difficulty.” – **Home-based service owner or manager**

Proposal 4: Record keeping for services

Explanatory text from the survey

At present, the Regulations do not set explicit requirements for home-based services to maintain records of their educators and evidence of their qualifications.

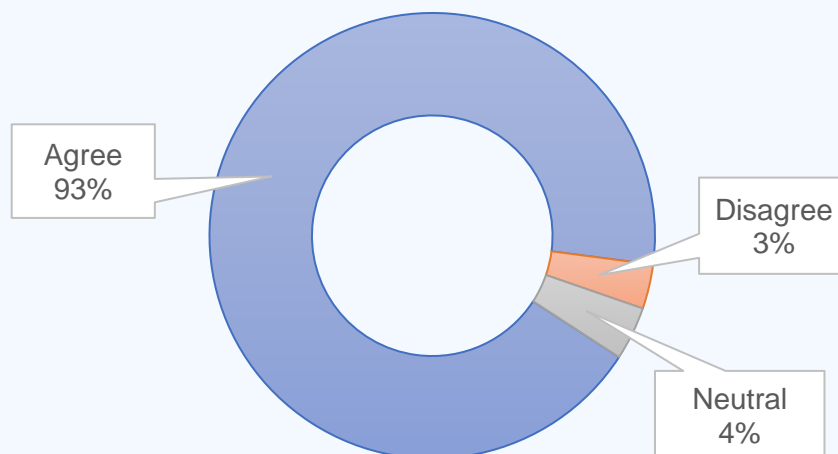
Records of educators and evidence of their qualifications are already compiled by home-based services that are on the quality funding rate. These services are required to record all their educators, their highest relevant qualification, the date this was achieved (or date of enrolment if not yet qualified), and when they joined or exited the licence.

The current draft regulations only require home-based services to maintain a list of educators and evidence of their qualifications for each licence. More specific requirements like the existing quality rate ones could be reflected in Licensing Criteria.

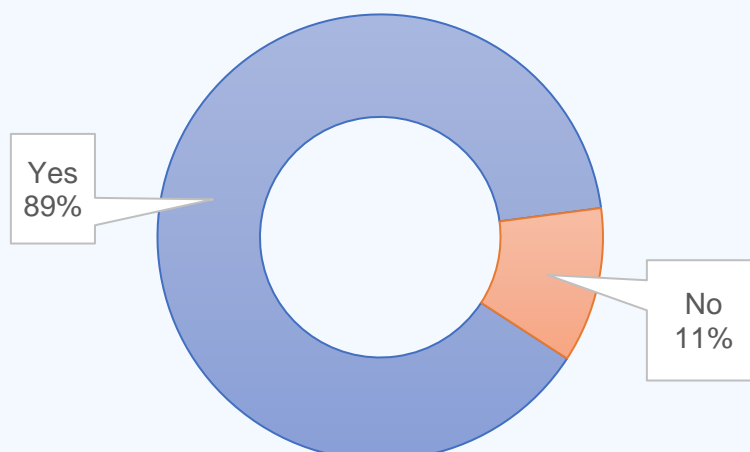
Proposed changes for record keeping in the draft regulations:

- | | |
|----------|---|
| 5 | Regulation 28 amended (Additional requirements for licensed home-based education and care service) |
| (1) | After regulation 28(1)(d), insert:
(e) for each of the service provider's licences, maintain a list of educators engaged by the service provider and evidence of each educator's homebased service qualification(s). |

Question 1: Do you agree that, to support the new educator qualification and percentage requirements, home-based services should need to record a list of their educators and evidence of their qualifications for each licence?



Question 2: Do you think the detailed requirements already required for the quality rate should be reflected in Licensing Criteria to support these regulatory changes?



Supportive comments

Almost all respondents agreed with the proposal on record keeping, some commented that it would keep services accountable to have qualified educators.

“This is something our service already does so this does not have an impact, but I feel it is really important for accountability that services have records of qualifications that are easy to access on each educators file.” – **Home-based visiting teacher**

“I agree because we are already keeping a record of what is required, the SMS System we use is very useful and all records are uploaded and updated weekly.” – **Home-based service owner or manager**

“We agree that home-based services should need to keep a record of their educators and evidence of their qualifications for each licence, to support the new educator qualification and percentage requirements.” – **Rockmybaby Group**

Questions nature or level of evidence

A number of respondents commented or had questions concerning how the evidence would be monitored or how detailed the evidence needs to be.

“I think the more evidence the better to ensure quality” – **Other worker at home-based, kindergarten and playcentre services**

“I am interested to understand how the record keeping will be monitored and supported by the Ministry of Education given it is hugely time consuming and onerous on service providers.” – **Home-based service owner or manager**

“We agree that home-based service providers be required to maintain a list of educators and evidence of their qualification. However, keeping a list for each licence would mean that if educators work across multiple licences, they will need to appear on each list. Would the Ministry expect home-based services to provide this list at specific times, i.e., as part of the EC1 or EC8 application processes, at the probationary or full licence inspection, or “on demand”?” – **Te Rito Maioha Early Childhood New Zealand**

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.

Supportive comments

Respondents expressed their support of the proposals and the progress they will encourage in the sector.

"I think the changes are really good, this will make all Home-based services align their paperwork according to MOE requirements. Making these changes will allow Home-based Services to be recognized and appreciated equally and childcare centres by parents and community." – **Home-based service owner or manager**

"I feel that the changes proposed is just what is needed to ensure quality ECE delivery." – **Other worker at a home-based service**

"I am fully supportive of a move towards a qualified workforce over time and believe that a universal increase in funding across both standard and quality licences is required to better support and enable the transition." - **New Zealand Home Based Childcare Association**

Some respondents noted that the changes may have a greater impact on smaller home-based services.

"On the whole I feel these changes will be beneficial, however I worry a little about the smaller scale home-based centres." – **Education and care teacher**

Weekly approach questioned

A home-based respondent commented that the weekly approach may not be the most workable option for home-based services.

"I believe that the week-by-week count will cause many problems, as educators and families have the right to take leave and it should not cause any problems with licensing. However, the proposed change will definitely affect the service, the educators and the families. It is unrealistic." – **Home-based visiting teacher**

Increase funding

Many respondents used this section to comment on funding. Most of these remarked that, in order for the quality of services to increase, funding must also increase. All of these respondents were associated with home-based services, most of them being service owners or managers.

"The service a family chooses to provide ECE for their child should be funded at the same rate. Please increase funding so we can provide High Quality Services." – **Home-based service owner or manager**

"PAUA also believes that alongside introducing the regulations for qualifications, the Government has not met the actual cost via increased funding required to implement these changes." – **PAUA**

"There is a cost in quality, and this must be reflected in an increased funding rate for home-based services that aligns with the funding allocated to our centre-based counterparts." – **Home-based service owner or manager**

"A higher rate of funding should be allocated in line with Centre based funding, for Home based teachers who hold a specific ECE qualification Level 7 or higher; it should be recognized for the expertise they bring to the sector." – **Home-based, Education and care teacher**

"The quality changes have a financial effect on services which is not reflected in any funding increases. Home based funding should increase relative to every stage and phase." – **Nurture Nannies**

COVID-19 impact

Several respondents were concerned that the impact of Covid had not been factored into the proposal, particularly noting that timeframes should be adjusted to accommodate to Covid-related setbacks.

“Due to lockdown, many Educators have been unable to complete the requirement of the training e.g., service not operating therefore no children in care so an extension on the timeline is essential for those who are part way through their course.” – **Home-based visiting teacher**

“Unfortunately, we then entered the August Covid lockdown which we are still enduring, at level 4. This was disastrous for our training programme...We are therefore asking for a one-off extension to the 31st of December cut-off date, due to the ongoing effects of Covid and the lockdowns. We were on target to get our Educators qualified by that date, but due to the restrictions we do not think that this is possible.” – **Amanda’s Home Based Childhood Education and Care**

“Covid has a HUGE effect on education, decisions to gain qualifications, job availability etc. Timeframes should be adjusted to reflect these Covid disruptions.” - **Home-based visiting teacher**

Support for educator training

Some respondents felt that there should be better support for educators gaining qualifications, such as less time pressures and supporting cultural competency.

“I agree and promote that Educators should gain their training; however, the time frame poses some pressure which could cause more focus to be on counting numbers of who is training etc. and take away the quality of the programme offered to the children. If we are to have all Educators be in training after 6 months, we will need more funding to support VT hours to provide additional support to Educators studying.” – **Home-based service owner or manager**

“Changes to educators’ qualification is great and a lot of educators will take it if the training on these Level 3 or 4 is free. However, it will take a village to support these educators to complete the course and be successful at it. Regulation needs to reflect the needs of all, despite the bicultural nature of Aotearoa. We as teachers need to embrace the diversity of cultures and know that what works for one culture does not apply to all. In terms of the Pacific and its different nations or regions, there is a difference between the islands and how we do things are not the same, may be similar in things but not all.” – **Home-based owner or manager**

Percentages

Some respondents, all associated with home-based services, were concerned that the way the percentages will be calculated could create difficulties for services.

“You have made it extremely hard on services to take on new educators, as there can only be a small percentage training at any 1 time. Therefore, if a trained educator leaves, it's almost impossible to replace then especially if you already have 1 or 2 in training. There needs to be more leeway allowing new educators to come on board, and train. Or homebased won't be available through lack of trained staff.” – **Qualified home-based visiting teacher**

“The way the % is calculated and the criteria to meet the % for quality funding are not consistent with other funding rules. When an Educator is available for care but has no children in care then you are proposing that they will not be counted in the % however when the % cannot be met for quality finding and the HB service drops down to standard funding the service is still reimbursing their Educators at the quality rate.” – **Home-based visiting teacher**

“[This change] goes too far by requiring minimum 80% qualifications which is inconsistent with the requirements of other licensed services and will, as mentioned previously, result in Home-based ECE being provided in an unregulated environment.” – **Home-based service owner or manager**



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equitable and **excellent outcomes**

He mea **tārai** e mātou te **mātauranga**
kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**