



# Review of Home-based ECE

Final Consultation Report



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# Introduction

On 21 August 2018, a discussion document was released outlining proposals for change to home-based early childhood education (ECE). The proposals were aimed at supporting quality in home-based ECE and ensuring government investment is directed towards education and care.

The early learning sector, educators, service providers, visiting teachers/coordinators, parents, whānau, and others were invited to provide feedback on the proposals through two online surveys (a short survey and more detailed submission form), consultation hui and targeted evening meetings. Consultation closed on 30 September 2018.

The main proposals were:

- » A Level 4 ECE qualification would become a requirement for home-based educators
- » Quality rate criteria would be lifted to a Level 5 ECE qualification for educators (service providers receive more funding if they meet quality rate criteria)
- » A lower rate of funding for au pairs, as they would be unlikely to meet the qualification requirement
- » Two options for improving educators' working conditions:
  - either requiring service providers to engage educators as employees rather than independent contractors
  - or requiring service providers to pass through a portion of government subsidy they receive onto the educator
- » Strengthening the visiting teacher/coordinator role
- » New transparency of funding requirements for service providers on the use of government subsidies
- » Including an educator's own children (aged 6 to 13) in the limit of children able to be present when home-based ECE is taking place.

The report begins with some background on the groups who engaged on the Review of home-based ECE (the Review), before outlining the major themes that arose. The first section of the report outlines feedback received on the major proposals in the discussion document, while the second section of the report outlines a brief summary of feedback received on all other proposals.



# Executive Summary

## Major proposals

### Qualifications

- » Respondents were split on the qualification proposals, which included the mandatory qualification requirement, quality rate and au pair exemption proposals.
- » The majority of service providers and peak bodies agreed with the Level 4 ECE qualification requirement, but disagreed with the quality rate proposal. Peak bodies and service providers were split on the au pair exemption – with larger service providers tending to agree while smaller service providers tended to disagree.
- » The proposal requiring educators to have a Level 4 qualification received the most attention. Reasons for agreeing or disagreeing with the proposal were similar to reasons for agreeing or disagreeing with the Level 5 quality rate proposal.
- » Commenters who agreed with the proposals considered qualifications would improve the quality of home-based ECE and would help protect vulnerable children. Commenters who disagreed tended to have concerns around the inputs required to gain a qualification, and the subsequent impact on educators. This related to the educator workforce generally, as well as specific groups of educators who were seen as more vulnerable to exiting the workforce, such as grandparents and educators who were not proficient in English.
- » Service providers and peak bodies overwhelmingly opposed the employee model because of the cost and administrative implications. Large service providers rejected the proposal to pass through a portion of the subsidy, but small service providers were much more likely to agree with this option.
- » The majority of educators who opted for the mandatory pass-through of subsidy funding wanted to remain contractors. Respondents typically discussed the benefits of contracting, rather than the mandatory pass-through itself. The rationale suggests that respondents may not understand how the Ministry subsidises ECE.

### Role of the visiting teacher

- » There was broad support for strengthening the role of the visiting teacher and requiring the same visiting teacher to visit the same educator consistently, as strong ongoing relationships were likely to boost the quality of the service.
- » The majority of respondents believed that the current requirement for visiting teachers to visit educators monthly was sufficient.

### Transparency of funding

- » There was general support for the proposed changes across both surveys and written submissions.
- » Respondents who agreed with the proposals suggested they would help hold service providers accountable. On the other hand, some educators and service providers indicated that the proposals may create misunderstanding and cause conflict between parents and service providers.

### Working conditions

- » There was no general consensus on the proposal relating to educator working conditions. From the options presented, the most support was for the current contracting arrangements to remain in place, with a portion of the government subsidy passed through to educators.





### **Limiting the number of school-aged children present**

- » Survey respondents were split on the proposal to limit the number of school-aged children present while home-based ECE is taking place.
- » The majority of peak bodies and service providers disagreed with this proposal.
- » Disagreement was largely driven by concerns that this proposal would restrict or exclude educators with large families. The benefits of relationships between older children and ECE-aged children (tuakana-teina) were also frequently cited.

### **Other proposals**

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#### **Health and safety**

- » Respondents overwhelmingly agreed with the health and safety proposals.
- » Many service providers outlined that they already require their educators and visiting teachers to complete health and safety training.

#### **Licensing**

- » There was no clear trend from feedback on changing the licence size. Respondents were fairly evenly split on changing the licence size to 1 visiting teacher to 15 educators, 1 visiting teacher to 50 children, or some other arrangement.
- » The majority of respondents agreed with requiring services to list educators on each licence, although there was significantly more support for requiring services to list visiting teachers on each licence. Respondents who disagreed with the proposal indicated that it would impose an unnecessary administrative burden on providers, particularly considering the high turnover of educators.

#### **Increasing the role of the Education Review Office (ERO)**

- » Respondents generally agreed with these two proposals. Respondents suggested that if these proposals were implemented, they would enhance assessors' understanding of home-based ECE and potentially bolster the reputation of the sector.



# Submissions

## Online engagement

Online engagement involved the release of one short survey, which sought feedback on the main proposals in the discussion document, and a more detailed submission form, which sought feedback on all the proposals contained in the discussion document.

The short survey received 1,695 responses, while the detailed version received 210, for a total of 1,905 survey responses. Both surveys were available in multiple languages during the consultation period.

## Survey respondents

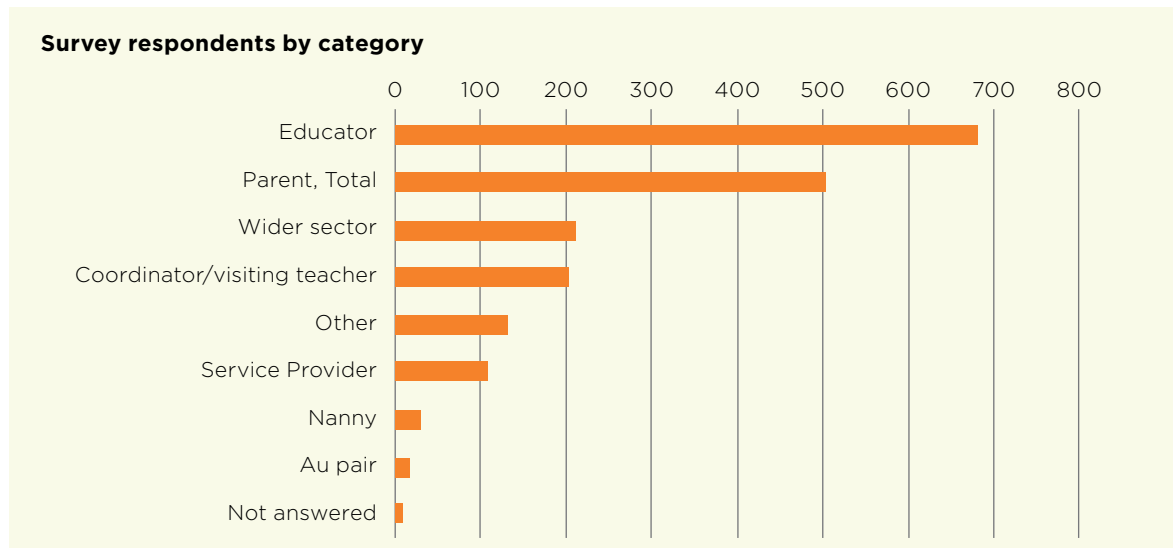
For both surveys, respondents were asked to select one category that best described their connection to the home-based ECE sector. Most respondents indicated they were either home-based educators (36%) or parents who either have, or have had, children in a service (26%).

While the survey data distinguishes between parents with children currently receiving home-based ECE (19%) and those whose children have previously been enrolled in home-based ECE (7%), this reporting combines these two groups.

## Ethnicity

Ethnicity data was captured for the quick survey only. Respondents were able to select more than one ethnicity so the percentage totals more than 100.

Pākehā / NZ European	1204	75%
Māori	239	15%
Asian	100	6%
Cook Islands Māori	24	1%
Rarotongan	10	1%
Samoa	30	2%
Tongan	29	2%
Niuean	12	1%
Tokelauan	7	0%
Fijian	17	1%
Chinese	118	7%
Indian	61	4%
Prefer not to say	59	4%
Other	102	6%
<b>Total</b>	<b>1695</b>	



## Detailed written submissions

38 written submissions were received through email and a document upload feature included in the detailed survey. Below is a list of all submitters.

### Service providers and peak bodies

- » Home Early Learning Organisation (HELO) (peak body)
- » New Zealand Home-based Early Childhood Education Association (HBCA) (peak body)
- » PORSE Natural Childcare
- » Au Pair Link
- » Barnardos
- » Creators Educational Trust
- » Edubase In-Home Care
- » Kuddles In-Home Childcare and Education
- » PAUA Early Childhood Home Based Care Service Limited
- » Pioneers Home-Based Education
- » Bright Futures Home Based, Child Care and Learning
- » Inspired Kindergartens & Home Based Service
- » Just Four Kids Home based childcare
- » Mainly Multiples – Homemade Childcare and Nanny Service
- » Nurture Nannies
- » Rockmybaby New Zealand
- » Amanda’s Home Based Early Childhood Care and Education
- » Waikato Kindergarten Association
- » He Whānau Manaaki

### Other

- » Margaret Barclay
- » Jane Rippingale
- » Raewyn Moffitt
- » Hannah Shutt
- » Janet Neill
- » Parent with nanny (no specific descriptor)
- » Stephanie Toni
- » Early Childhood Council
- » Te Rito Maioha
- » Te Kōhanga Reo National Trust
- » Careerforce

- » COMET Auckland – Te Hononga Akoranga
- » Mike Bedford
- » New Zealand Educational Institute Te Riu Roa
- » Open Polytechnic
- » Whanganui Chamber of Commerce
- » Oranga Tamariki
- » Teaching Council of Aotearoa New Zealand
- » Creators at Home (11 identical submissions)

## Face-to-face engagement

### Hui for service providers

The Ministry held seven hui for service providers at six centres across New Zealand, including Auckland (Central and South), Tauranga, Hamilton, Wellington, Christchurch, and Dunedin. Overall, approximately 450 service providers attended the hui. The largest hui were in South and Central Auckland with around 100 attendees at each event.

The Ministry also engaged with home-based services through video conference facilities in regions where hui were not held due to time constraints. This included teleconferences in Whangarei, Taupō, Kaitia, Nelson/Blenheim, and Napier.

### Evening meetings for educators and visiting teachers

The Ministry talked to around 300 educators, service providers and visiting teachers at eight evening meetings targeted at educators in Auckland (Central and two meetings in South), Tauranga, Hamilton, Wellington, Christchurch and Dunedin. The Ministry heard from educators and service providers who provided home-based ECE to Māori, Tongan, Samoan, Chinese, Afghani, Russian and Somali children in these languages.

# Method of analysis

## Coding framework for surveys

All survey comments on each proposal were analysed using a coding framework developed for the Review. The draft framework was further refined as new themes emerged and existing themes became more clearly defined. NVIVO, software that supports qualitative research, was used to organise this information.

The coding framework organised survey data by topic category, policy proposal, response to proposal, and theme.

For example:

Qualification

- » Level 4 qualification requirement
  - Agree
    - Improve perception of home-based ECE

Respondents often discussed several issues related to a given proposal. In these cases their comments were cross-coded to multiple themes. In this way, respondents who made more comprehensive comments were able to have their views captured in all appropriate places.

Themes are referenced in this report if 10% or more commenters discussed that theme. In some cases, minor themes have been included to enhance the understanding of other themes, or add nuance to the overall narrative of sector views.

## Written submissions summary

The 38 detailed written submissions were manually summarised by the Ministry of Education. Like the survey, specific opinions and comments were organised by topic category, policy proposal, sentiment (agree/disagree/no opinion) and theme.

Submissions written on behalf of a specific organisation that were submitted multiple times were counted as a single submission.

# Responses to proposals for change – major proposals

## Qualifications

### **Proposal:** Level 4 ECE qualification requirement

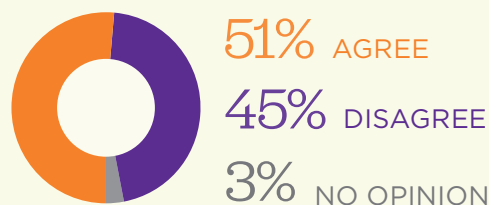
Educators do not currently need to hold an ECE qualification. Qualifications are linked to positive outcomes for children.

We're thinking about requiring all educators to hold a Level 4 ECE qualification. It takes 6 months to complete full-time, and can be done online. To pass, educators must be able to read and write well in English.

There would be a transition period, to allow educators time to complete the qualification.

#### **What do you think of this proposal?**

Results across both the short and detailed survey:



### **Agree**

#### **Qualifications support quality in home-based ECE**

The majority of commenters who agreed with the proposal considered the requirement would improve the quality of home-based ECE. Ideas around how qualifications would drive quality tended to be grouped into two related strands. One strand argued that qualifications would establish a quality baseline that would serve to protect children, particularly vulnerable children. The second argued qualifications would improve an educator's ability to perform their role through increasing their knowledge and understanding.

**Home-based educator:** I think it's a great idea as education and a better understanding of Te Whāriki is important so educators can work and understand the needs of a child and their family. I have just completed my Level 4 ECE and I gained some great knowledge to use in my practise.

**Te Rito Maioha:** We support the proposal that home-based educators should be required to have a minimum level 4 qualification. This will ensure that educators better understand that

their role and responsibilities are quite different to that of a parent or grandparent and have a sound knowledge of the legal requirements around education and care, health and safety, and Te Whāriki: the early childhood curriculum and how these can be applied in practice.

**Barnardos:** We agree that all home-based educators need to have the qualifications, knowledge, experience and attributes to provide a service that delivers high quality educational outcomes for tamariki.

#### **Qualifications lift the status of the profession**

Other reasons for agreeing with the proposal were a desire to improve public regard for home-based ECE, and a desire for a more committed and professional educator workforce.

**Member of the wider ECE sector:** The ECE profession should be held in high regard and currently it isn't as many see it as an easy way to earn money by "baby sitting." All ECE sectors should have staff that hold a minimum Level 4 ECE qualification relative to the NZ ECE curriculum - Te Whāriki.

## Disagree

### Qualifications do not necessarily increase quality in home-based ECE

Respondents who disagreed with the proposal tended to think that qualifications did not necessarily increase the quality of home-based ECE provided by educators. They thought other factors, such as a loving environment and/or shared culture, were equally or more beneficial to quality in home-based ECE.

**Home-based educator:** For educators for children under the age of 5 the most important aspect is caring loving relationships and no qualification teaches this.

**Home Early Learning Organisation (HELO):** We have some concerns around the assumption that a qualification is the only indicator of quality. Qualifications are not the only indicator of quality; it is multi-faceted.

**Parent:** It's not so easy to find someone who is completely trustworthy to care for my children, especially one who speaks the same language and has the same culture. If they are required to receive training, then I won't be able find anyone to help me look after the children, and I can't go out to work. I will be happy if the carer is nice to my child and is able to take care of him. I don't need her to reach any level of education.

### Inputs required to gain a qualification may impact on an educator's ability to remain in the sector

Most commenters who disagreed with the proposal were concerned about the inputs required to gain a qualification, and how this impacts on an educator's choice or ability to remain in the sector. Respondents were concerned that the proposal may disproportionately impact certain groups – in particular experienced older educators, grandparents, educators with English as a second language, and educators with a Level 3 ECE qualification. These educators were seen as more vulnerable to exiting the profession if a mandatory qualification was required. It was believed that these educators would be less willing to undertake study, or unable to meet the English competency requirements needed to undertake study.

**Home-based educator:** There are lots of experienced educators out there who have a wealth of knowledge that wouldn't do this and leave the industry which would be such a shame. I have level 3 and don't want to do a whole new course just to go up to level 4. What about a specific module to cover communication with the child, although I feel that I have great communication already as I have time to spend with them.

**Home-based educator:** We cannot afford the tuition. Besides, we do not have time to study as we need to look after our grandson. We are getting old and do not know English. It's impossible for us to take any courses taught in English. We both have tertiary qualifications from China, and have good knowledge in the concept of parenting.

### Kuddles In-Home Childcare & Education:

Mandated qualifications are likely to drive back more informal ECE care arrangements particularly for the ethnic and lower socio-economic groups where some current educators may not have the appropriate English skills to complete any qualification, which could have adverse outcomes for those children who best benefit from current formal ECE arrangements.

Respondents who disagreed also discussed the impact of the proposal on the educator workforce generally. These concerns related to the cost required to undertake a qualification, whether educators would be able to begin or remain as an educator through combining study with work and whether there would be sufficient transition time for educators to be able to gain their qualification.

**PORSE Natural Childcare:** An important consideration here is the cost of training. There is a significant cost for providers in offering qualification pathways to Educators... We are keen to understand more about how the cost will be off-set to not disadvantage Educators and service providers.

Some service providers in written submissions mentioned concerns about how a qualification requirement may impinge on equity in low-socio economic areas. They feared service providers would poach from an existing pool of qualified educators, rather than invest in their own workforce.

**Bright Futures Home Based, Child Care and Learning:**

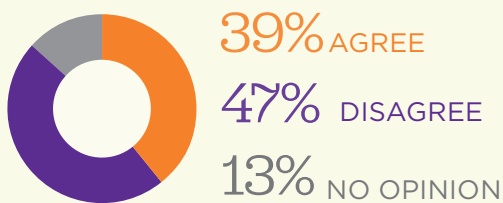
The Ministry should be prepared for the resulting market behaviour that would concern us who have supported this workforce already and enabled a high level of attainment achieved – a minimum qualification would likely result in other providers preferring to poach from existing pool of qualified educators than invest. This would mean that educators who are supporting lower –socio economic parents i.e. lower parent fee paying services - would drift to providers operating in the more affluent space.

**Proposal: Level 5 ECE qualification for quality rate funding**

We're thinking about making Level 5 ECE qualifications or above a requirement for the quality rate (service providers get more funding on the quality rate). It takes one year to complete full-time.

**What do you think of this proposal?**

Results across both the short and detailed survey:



**Agree**

**The quality rate incentivises educators to commit to ongoing training**

Respondents who agreed with the proposal tended to state they did so because they thought it recognised and incentivised educators to commit to ongoing training and development. Respondents also tended to believe the proposal would improve the quality of home-based ECE.

**Home-based educator:** I think it's good to incentivise a better pay rate based on better qualifications and ultimately better outcomes for the children.

**Rockmybaby:** We believe this would reflect the commitment to ensure educators continue with upskilling and gain higher qualifications.

Some service providers agreed in principle, but thought that the higher funding rate should be applied to individual educators rather than the whole network, or that it should be directly linked to educators' remuneration. Others were concerned about implementation.

**Te Rito Maioha:** It should be noted that it is important that payment of this higher rate is reflected directly in the payment received by the home-based educator.

**Home-based service provider:** I believe in the change but allow a lot of time to implement it... Are there scholarships for teachers trying to get level 5? Will teachers who achieved their certificate in PIECCA (Pacific Islands Early Childhood Council Aotearoa) training be eligible for quality funding?

**Disagree**

**Qualifications do not necessarily increase quality**

The majority of respondents who disagreed with the proposal did so for the same reasons respondents disagreed with the Level 4 requirement. This included the view that qualifications did not necessarily increase the quality of home-based ECE and the inputs required to gain the qualification would negatively impact on an educator's choice to remain in the sector. In particular, the practicum requirement of the Level 5 qualification was raised as a concern as it is required to be completed in a centre.

**Visiting teacher:** It is a shame that at present Level 5, 6, 7 qualification providers are not supportive and have not catered for in home educators to up skill if they aspire to - as most Level 6 and 7 qualification providers do not let educator learners to have an in home care practicum - so the study options are limited.





### There is insufficient basis to continue with two funding rates

Many respondents believed that there was insufficient basis to continue with a two-tiered funding system. Respondents believed that Level 4, particularly combined with ongoing professional development, was a sufficient standard and that Level 5 was unlikely to significantly raise quality beyond this. Without a pass-through requirement, educators were also unlikely to see an increase in pay so would not have a strong incentive to undertake further study. Similarly, service providers also pointed out that the work required to receive the current quality funding rate was not worth the increase in funding.

**Home-based educator:** I disagree to make this mandatory. Level 5 should be a choice. We often can't ask for more money per hour than we are currently doing even if we have more qualifications.

### Two funding rates create perverse incentives

Some respondents thought there was a perverse incentive to organise networks based on funding levels rather than what was best for the child. They believed that the two-tiered funding system could also exacerbate disparities between higher and lower socio economic communities.

**He Whānau Manaaki:** It would continue the perverse incentive of organising networks based on funding levels rather than on what is educationally best for children – for example, organising so educators are geographically close or so they are able to work in networks with others of a similar language/cultural group.

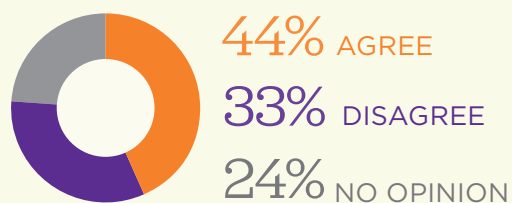
**Nanny:** This sounds like performance pay.. and give similar results, such as a two tier system where the quality can only be for those who pay. I suspect the lower qualification areas are the ones that need the funding, to provide PD, education etc.

## Proposal: Au pair separate rate and qualification exemption

Au pairs are only in New Zealand for a short amount of time, so are not likely to meet the qualification requirement. They could be funded at a lower rate than educators with an ECE qualification.

### What do you think of this proposal?

Results across both the short and detailed survey:



44% of respondents agreed with the proposal. However, because respondents were agreeing or disagreeing with a proposal composed of two parts, both establishing a lower funding rate and exempting au pairs from the proposed Level 4 ECE qualification requirement, coding data is able to give us a more complete picture of sector views.

### Agree

#### There is significant value in the service au pairs offer

Commenters who thought au pairs should continue to be funded typically saw significant value in the service au pairs offer to children and families, and wanted to see this service continue.

**Visiting teacher:** Au pairs are great. They work hard and bring in tourism. They undergo extensive checks. They are accountable to parents who are paying them their living.

**Au pair:** Families that have no family support or solo mothers have no other option [than au pairs] in NZ for affordable home help... daycare centres are only open Monday to Friday 8am to 6pm. A lot of people work outside of those hours.

**Parent:** All my Au Pairs have not received a formal education but they have provided an excellent job to my children. It comes down to the parents how they teach the Au Pairs to deal with the children. All my Au Pairs came from Germany and as a result my children have basic understanding of a foreign language and culture they would not have otherwise.

Some respondents suggested that if au pairs were exempted from the qualification requirement, other groups should also be exempted, such as grandparents or short-term educators.

**Creators Educational Trust:** It is unrealistic for [short-term educators, including Oranga Tamariki caregivers] to hold a Level 4 qualification and some kind of exception should be considered not only for Au Pairs but also for educators providing short-term services.

### Disagree

#### Au pairs are not “educators” and should not be treated the same

Commenters who were unsupportive of au pairs tended to not consider them “educators” and therefore thought they should not attract the same amount of funding, if any funding at all. Some commenters believed that au pairs should have the same responsibility as other educators in ensuring quality outcomes for children.

**Home-based educator:** This is crap they have the same responsibilities and as such should require the same. If you bring in that home educators need to be qualified so should au pairs.

**Member of wider early learning sector:**

No funding should be provided from our government for au pairs. They are a babysitter, not education for children. They don't know anything about our curriculum document

Smaller service providers were more likely to argue that there was no justification in funding au pairs, even at a lower rate. Some submitters also disliked the continuation of a two-tiered funding system and thought that a lower funding rate would lower expectations of the sector. Some also thought a drop in funding could impinge on the quality of service.

**Early Childhood Council:** Either (teacher) qualifications are important to children's education and wellbeing or they are not. Regulations cannot be applied differently in different types of services.

**Further comment on qualifications****Educators would like to be able to maintain their teaching registration**

Many commenters wanted registered teachers to be able to maintain their teaching registration while working as home-based educators. Some respondents wanted more stringent checks and requirements on educators. These respondents were concerned that the minimum standards for educators were not sufficient to prevent inappropriate candidates from working in the sector.

**Home-based educator:** As a Fully Registered Teacher and a Homebased Educator I would expect I will be able to retain and hold my registration instead of allowing it to lapse into subject to confirmation.



# Working conditions

Some educators who work as contractors may be earning less than the minimum wage, and not receiving KiwiSaver employer contributions, annual leave or sick leave.

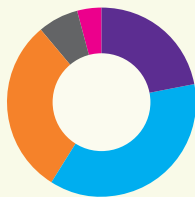
Poor working conditions can increase stress, and affect an educator's ability to work well with children.

We're considering two options to improve educator working conditions:

- » The educator, au pair or nanny becomes an employee of the home-based provider. Their service provider may require them to look after more children due to the additional cost (for example, 4 children).
- » The home-based provider has to pass on a certain amount of the government subsidy to the educator but the educator remains a contractor (or if an au pair/nanny an employee of the parent)

### What option would you prefer?

Results across both the short and detailed survey



**22%** ENGAGE EDUCATORS AS EMPLOYEES

**37%** PASS-THROUGH OF GOVERNMENT SUBSIDY BUT REMAIN AS CONTRACTORS

**30%** NO CHANGE

**7%** NO OPINION

**4%** OTHER

## Proposal: Require service providers to engage educators as employees

### Agree

#### Educators will be able to receive entitlements as employees such as leave

Respondents who preferred an employment relationship primarily did so because of a desire to receive minimum entitlements associated with being an employee. Specific entitlements mentioned included annual and sick leave, public holiday entitlements, KiwiSaver employer contributions, and a fair and consistent wage.

**Home-based educator:** While I have really enjoyed working as a contractor with [service provider], I have never earned much money or felt adequately paid for the work I do. I have even been encouraged to lower my rate. But the majority of Home Based Carers I think are exploited and underpaid, with poor work conditions. There is a dire need for more clarity on work conditions and a fairer rate of pay.

#### New Zealand Educational Institute Te Riu

**Roa:** The benefit of this approach is that this means educators are guaranteed an income/ KiwiSaver contributions/full access to ACC on a regular basis and may gain a greater sense of their rights under the Employment Relations Act 2000.

#### An employment model would create a more structured and accountable relationship

Respondents also believed an employment model would create a more structured and accountable relationship between educators and service providers. As employees, respondents believed service providers would have greater oversight and control over the quality of ECE provided. Other respondents focused on the benefits of educators coming under the protection of employment law, and felt this relationship would reduce the exploitation they currently see in the sector.



**Home-based service provider:** Having worked previously under a home-based provider I found there was no fall back on anything and was left completely high and dry. I had a good legal case but no money to fight and instead held my head high and started my own business. The educators need to be looked after and protected

**Parent:** I think in this scenario there would be less opportunity for carers to be exploited. They may need to care for higher numbers of children but they are more likely to provide higher quality care.

## Disagree

### An employment model would increase costs substantially for service providers

The vast majority of detailed submissions from service providers disagreed with this proposal. Service providers believed there were many benefits to the current contracting arrangements, and a shift to an employment model would increase costs substantially. Service providers thought these costs could render services financially unviable in the long-term.

**Home Early Learning Organisation (HELO):**

We are strongly opposed to this idea. Our modelling that has been undertaken by our individual services suggests this would increase the costs of care from conservatively to well over 50% on average. For lower-socio economic families this figure is over 150%. This cost would have to be passed through to families if there was no corresponding increase in Government subsidy funding.

**Barnardos:** [The contractor model] is the most effective for both the service provider, the home-based educator, and parents. Moving to an employee only status would challenge this flexibility, and risks behaviours that could undermine freedom of choice and flexibility for educators and parents.

## Proposal: Pass-through of government subsidy but remain as contractors

### Agree

#### Educators want to remain as contractors

The majority of respondents who preferred a mandatory pass-through of subsidy funding generally wanted to remain as contractors. Typically, respondents discussed the benefits of contracting, rather than the mandatory pass-through itself. The rationale suggests that respondents may not be aware of the extent of ECE subsidies. This is consistent with the Ministry's experience at face-to-face meetings, where many educators thought the pass-through they received for 20 Hours ECE was the entirety of ECE funding. Many educators did not know that children aged 2 and under were also generating a subsidy, and that the portion of funding they received for 20 Hours ECE was not the entire amount provided by the Ministry.

**Home-based educator:** I understand there is extra government funding for children under 2 years, who are extra work for the educator. However, none of that funding is passed onto the educator who is doing all the extra work. I would like to see extra money going to the educator if caring for an "under 2".

#### A pass-through requirement will improve educator pay

For those who discussed the pass-through, commenters thought it would be an effective way to prioritise and improve educator pay. Respondents also mentioned the desire for financial assistance to purchase resources for children, as currently many educators provided these resources out of their own pockets.

**Visiting teacher:** I have been an educator and I felt that home based companies were selfish with funding money and not using it for its intended purpose! Some should go back to the educator to cover resource costs such as petrol, power, water and educational resources.

### Contracting allows for more flexibility

For those that discussed contracting, the main benefit cited by educators was that they enjoyed the flexibility and choice afforded to them. They appreciated the ability to choose how many hours they worked, how many children they provided home-based ECE to and which families they worked with. Other benefits mentioned include the ability to reduce taxable income as well as remain eligible for government benefits like Working for Families. Some educators also mentioned being able to make well over minimum wage when caring for four children.

**Visiting teacher:** The benefit of home educators being self-employed contractors is that they are often still able to have the benefits of Working for Families etc based on their taxable income. They also currently have a substantial amount of income classes as non-taxable due to business costs.

**Home-based educator:** We do at times receive below minimum wage if caring for less than 4 children and do not get sick pay, KiwiSaver etc. But I prefer the flexibility of being self-employed.

### Disagree

#### Service providers were split in their response to the pass-through proposal

In written submissions, larger service providers overwhelmingly disagreed with the proposal, while smaller providers were more likely to agree. Those that agreed specified it is important to pass on the government subsidy to educators, and some noted they already did. Those that disagreed outlined that support costs incurred by the service provider are high, and this requirement would have a negative impact on educators and families through potentially decreasing community outings, professional development and support.

**PORSE Natural Childcare:** It will take away from the investment providers are already making in quality indicators like community programme and training because they won't be able to afford it under an employment model OR under a subsidy funding pass through model... Providers will only be able to cover this by removing 'unessential' aspects of service delivery, such as the community programme and

ongoing investment in training to re-allocate this spend to cover the cost of employing Educators or passing through subsidy funding.

### No change to status quo

#### Some commenters felt that the current working conditions were fine

Commenters who selected no change stated they did so because they were happy with current working conditions. Similar to preferring a mandatory funding pass-through, many commenters opted for no change as a reaction against the suggestion of educators becoming employees, rather than as a genuine endorsement of current working conditions in the sector. Respondents who selected this option were more likely to be service providers.

**Home-based educator:** I strongly feel you shouldn't mess with this one. I like being a self-employed contractor. I like being able to set my own hours, numbers, holidays and rates. If I am earning less than minimum wage it is BY MY CHOICE!

### Further comment on working conditions

#### A need for a better relief system for educators

The dominant theme emerging from comments on this proposal was the need for a better relief system for educators. Many who selected the employment option clarified they did so solely for sick and annual leave entitlements. Others selected the funding pass-through option as they hoped the resulting pay increase would enable them to cover lost earnings incurred through taking time off. Some hoped for a hybrid contract/employment system that allowed educators some of the freedoms they enjoy as contractors, but still enable them to have paid time off.

**Home-based educator:** In many ways I like being a contractor to a provider as I set my hours, the amount of children I care for and take time off when I need to. However I have found it stressful and difficult financially when I have to close for illness or for holidays. So I would like the freedoms I have as a contractor but I would still like to be paid for annual leave and sick days.



A consistent theme from the comments was that educators cannot afford to take a break, due to the impact on their income. These respondents reported that educators risk poor health and burnout by frequently working while sick or without taking time off for extended periods, up to years at a time. Some educators felt that they could not take time off because they would not want to inconvenience families using their services and risk losing their business.

**Home-based educator:** It can be very challenging working for young children, especially if we get sick however because we don't get paid when we take time off it makes it very difficult. I will often work when I should actually take the day off knowing if I don't work then that means no income coming in. If we work when we are sick then we can burn ourselves out.

### Other comments

Other respondents wanted to increase pay for educators. While some of these respondents discussed funding pass-through from service providers, most linked higher pay to increased government funding. It was not always clear

if these respondents were fully informed on funding rates and how they related to pay. Some even appeared to be unaware that their service providers were receiving government funding for the children in their care and thought the pass-through they received was the entirety of the funding.

Further themes that emerged from comments on this proposal include a strong sense of discontent with providers. Commenters felt that some providers are exploitative, provide insufficient support to educators, and focus more on profit than providing quality ECE services.

**Home-based educator:** As self-employed contractors we should understand the benefits and pitfalls of this agreement, it is a model used in other industries, it isn't a new concept. However, I do believe some service providers are making significant profits out of this funding model without providing educators with sufficient support.



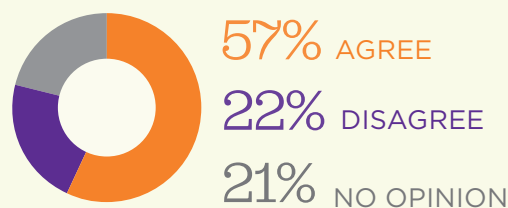
# Transparency of funding

## **Proposal:** Create more transparency on the use of government funding

We're thinking of requiring home-based providers to make more information available on how they use government funding. This proposal includes showing the level of government subsidy a child receives on invoices to parents.

### **What do you think of this proposal?**

Results across both the short and detailed survey



## **Agree**

### **Transparency of funding will empower parents and educators**

The majority of respondents who agreed with the proposal did so because they hoped increased transparency would inform parents and/or empower educators. Respondents felt that parents have a right to be well informed of the funding their child attracts. They thought that greater transparency would improve parent choice, as parents could screen service providers based on their use of funding. Many respondents knew about the 20 Hours ECE subsidy, but did not know that children aged two and under were also generating a subsidy through the Under 2 and 2 and Over subsidies.

**Parent:** It would be good to understand the level of funding that is associated with the au pairs employment. At present we just pay the au pair the full rate, minus the 20 hrs free for 3-4 year olds. We do not know what other subsidy the au pair agency gets, if any.

**Parent:** If there is government funding supporting my child's home-based care then I want to know exactly how that is being utilised by the organisation. It would help inform my choice of home based educator and know what

their priorities are. I have the same expectation about any service that has tax payer money invested in it. I am actually surprised this isn't already a requirement.

Educators believed that increased transparency would empower them to negotiate fairer pay, seek financial help with resource costs, and push for increased support, outings and professional development.

**Home-based educator:** At present home based carers have no idea of how much funding providers receive. I think it would be fair to know how much of the subsidy is being returned to the home based carer in professional development and support etc.

### **Transparency of funding will strengthen service provider accountability**

Commenters also saw this proposal as a mechanism to enforce accountability and reduce profit-seeking practices by service providers. Many commenters felt strongly that providers need to be held more accountable for their use of ECE funding, and many had serious concerns about current practices in the home-based sector. Members of the wider early learning sector felt particularly strongly about this point.

**Nanny:** It should be absolutely mandatory that providers have to show parents the subsidy they are receiving for every child on their invoice so that parents can make an informed decision about whether they are receiving value for money... It is absolutely outrageous that these providers are able to hide the subsidies they are receiving and making huge profits while some home-based educators aren't even making minimum wage.

In written submissions, service providers were generally in favour of the proposal provided it was applied to all service types.

**Au Pair Link:** We currently do this. However, families already find funding confusing, so this would need some more thought from the MoE. This is a change that if implemented needs to be implemented across all ECE service types, not just for home-based ECE. It is unfair to put this level of transparency in for home-based services and not other service types too.

## Disagree

### The home-based ECE sector is already transparent

Respondents who disagreed with the proposal tended to feel it was unnecessary, because the sector was already transparent to them. Some service providers pointed out that information on government subsidies was already public information. They also felt that additional transparency requirements would add an unreasonable administrative burden.

**Visiting teacher:** I feel that the use of Government monies is already transparent, with annual audits being public documents as well as the Government funding being shown on Parent Invoices where applicable.

**Parent:** The parent just wants to know their child is getting good care and education while they are at work, their perception of themselves as customers changes with this information and at the end of the day, I think it's going to create unnecessary stress for the teacher. Teaching in this environment is hard enough already.

### Transparency requirements may cause conflict between parents and service providers or educators

Some respondents were concerned that informing parents of funding specifics would cause misunderstanding and create conflict between parents and service providers or educators. Service providers and educators were concerned that parents would not account for operating costs and expect to more directly benefit from the funding attracted by their children. Some worried that parents would refuse to pay fees or make optional donations if they were aware of funding rates.

**Home-based service provider:** An administration nightmare!! I can also see that some parents might interpret this in such a way that they would deduct the amount from the sum owed to the service.

Others were concerned that if parents began shopping for the service providers that passed on the greatest proportion of funding, sector-wide spend on key elements of a quality home-based education would drop in a competitive race to the bottom. They felt that the value of visiting teachers, professional development for educators, and enriching experiences like outings and playgroups for children, would be particularly hard to communicate to parents.

**Home-based educator:** Putting it on the invoice does not give the full picture to parents of costs involved in the running of the business and costs involved.



# Role of the visiting teacher

## Proposal: Strengthen the role of the coordinator/visiting teacher

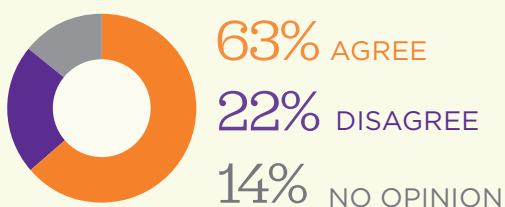
A stronger relationship between educators and their coordinator/visiting teacher would support better interactions between educators and children.

For example:

- » the visiting teacher could visit more often
- » the visiting teacher could have experience teaching adults
- » the same visiting teacher could support the same educators
- » the visiting teacher could have regular networking/training meetings for educators and provide telephone support.

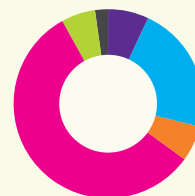
### What do you think of this proposal?

Results across both the short and detailed survey



- » The visiting teacher could visit more often
- The majority of respondents agreed with all of the visiting teacher proposals, but wanted visiting teacher visits to remain the same—one home visit per month, per child.

### How often do you think the coordinator/visiting teacher should visit?



- 7% WEEKLY
- 22% FORTNIGHTLY
- 6% EVERY TWO AND A HALF WEEKS
- 57% NO CHANGE - MONTHLY
- 6% OTHER
- 2% NO OPINION

### Most respondents wanted visiting teacher visits to remain monthly

Respondents felt the current system provided sufficient contact. Many educators and service providers mentioned that educators typically received substantially more visiting teacher support than the required monthly visit. Respondents noted that educators often make regular contact with visiting teachers outside their home – at playgroups, other outings, and professional development courses. Many educators saw their visiting teacher fortnightly, weekly, or even multiple times per week. Commenters also noted that under current

regulations, visiting teachers must visit every child once per month, which often meant multiple visits per month for educators with part-time children.

**Home-based educator:** If a service is doing its job and sighting every child per month, and providing ongoing professional learning and a rich curriculum of activities, they should already be seeing the educators a couple of times per month, if not week.

**Waikato Kindergarten Association:** Due to the nature of home-based ECE, most educators will be visited 3 or 4 times a month anyway due to the children's enrolled hours.



**Visiting teacher:** As with our service there is a regular monthly visit and depending on when the children are in care across a week, some educators are already receiving two visits or some times more. We are also in frequent contact with educators outside of these monthly visits, through phone contact, weekly playgroups and active movement sessions and on Educa where discussions on teaching and learning occur.

A small minority of respondents felt educators were unsupported and isolated, and wanted visit frequency to increase.

**Member of wider early learning sector who selected weekly visits:** This NEEDS to happen, educators are too isolated and unsupported. I hold grave concerns for some educators that are operating below par with no monitoring or support.

### **Proposal:** The visiting teacher could have experience teaching adults

#### **Agree**

##### **Requiring visiting teachers to have experience teaching adults more accurately reflects the job requirements**

Respondents who agreed felt this change would more accurately reflect the actual job requirements of visiting teachers. They felt that while a background and certification in ECE teaching is necessary for the position, it does not capture the full requirements of a role that is primarily providing adult instruction, mentoring and review. Some service providers mentioned in their written submissions that hiring visiting teachers with experience teaching adults was already common practice at their service.

**Member of wider early learning sector:** The role of the visiting teacher needs to be clarified to better reflect the fact that they are a professional with experience in both the education of young children and providing professional learning to adults.

#### **Disagree**

##### **A requirement to have experience teaching adults could be unreasonably restrictive**

Those that disagreed felt it was unreasonably restrictive to make this experience a prerequisite. These respondents felt that new visiting teachers would need to start somewhere when seeking to gain experience guiding and instructing adults.

##### **PAUA Early Childhood Home Based Care**

**Service Limited:** PAUA works in a number of rural and isolated areas and this requirement would make it difficult to fill positions. We expect that part of the service's role is to provide induction for Visiting Teachers which would include mentoring and assisting new Visiting Teachers to settle in their role. Visiting Teachers in PAUA are encouraged to enrol to gain the NCALNE (National Certificate in Adult Literacy and Numeracy Education) but it would be unreasonable to expect that this requirement be in place before entering home based ECE unless it was part of the ECE degree or diploma.

### **Proposal:** The same visiting teacher could support the same educators

#### **Agree**

##### **Ongoing relationships between visiting teachers and educators are needed to support quality**

Respondents who agreed were driven by a desire to support relationships between educators and their visiting teachers. Respondents felt that this proposal would reflect the need for strong and ongoing relationships to effectively support quality. Some respondents felt that consistent visits from the same visiting teacher are needed to provide effective oversight, and were concerned that quality or safety issues could be missed if visiting teachers changed frequently. Many service providers mentioned in their written submissions that this was already common practice at their service.

**Home-based service provider:** I think there should be a particular Visiting Teacher allocated to each Educator so that the relationship with the Educator is strong and personalised and that the children really know their visiting teacher too.

## Disagree

### There is value in educators having relationships with multiple visiting teachers

Those that disagreed felt there is value in allowing educators to benefit from the perspectives of multiple visiting teachers. They thought this would be particularly useful when visiting teachers left a provider, or were on leave.

**Home-based service provider:** Having the same VT for the same educators is a good idea, however sometimes conflict can arise and changes need to be accommodated for this. This can be hard for the small service provider with only one VT.

- The visiting teacher could have regular networking/training meetings for educators and provide telephone support.

### The ability to grow mutually supportive networks is important

Respondents who agreed with the proposal felt these types of meetings would help educators to develop mutually supportive networks. These respondents focused on the value of growing relationships within strong communities of educators, visiting teachers, and whānau. Some service providers mentioned in their written submissions that this was already common practice at their service.

**Home-based educator:** Networking & training has been something I've been requesting from our visiting teacher for years.

There were no significant reasons for disagreement. Wider discussion included respondents who felt that playgroups and other outings can effectively function as PLD and networking meetings. These respondents felt that these activities provide educators the opportunity to meet and develop relationships with other educators and visiting teachers, observe the working styles of other ECE professionals, and receive feedback and tips on their interactions with children from a wider group.

**Visiting teacher:** Playgroups are great for networking and so visiting teachers have another way of keeping contact with educators.

## Other comment on visiting teachers

### Importance of individual visiting teacher qualities

Some respondents felt that the quality of visiting teachers themselves should be a primary consideration. These respondents, mostly educators and parents, felt that variability in the skills and reliability of visiting teachers had a greater impact on the quality of support provided than the factors considered by the proposals.

### Need for specialised training of visiting teachers

Other commenters also felt that more training should be required of, and available to, visiting teachers. These respondents especially hoped for training that focused on skills not delivered during ECE teaching - particularly managing relationships, adult pedagogy, and leadership.

**Parent:** I do not feel that they need to have experience teaching adults, just like any leadership role in a centre, however they could rather look at leadership training as could be provided to say a head teacher or centre manager to give them the support they need with supporting and growing their educators.

### Visiting teacher workload too high

Some respondents, particularly those who were visiting teachers themselves, discussed serious concerns they have with the current workload of visiting teachers. These respondents felt that expectations for visiting teachers given current workloads were too high, which reduced the quality of support available to educators and children. Some major concerns related to the number of children covered and time spent on call while taking annual or sick leave. Some visiting teachers also suggested that the regulations should be clarified as there is a risk of them not being implemented correctly. For example, it is unclear whether a visiting teacher can cover a maximum number of children across their work entirely or at any one time<sup>1</sup>.

**Educator:** I feel visiting teachers have a huge workload. My VT sometimes works till late at night and in the weekends just to catch up.

<sup>1</sup> Regulation 44 (1)(d)(ii) of the Education (Early Childhood Services) Regulations 2008 requires that, at all times while children attend a home-based service, there is 1 person responsible for every 50 children. The issue raised by respondents is that it is unclear whether this means a single coordinator/visiting teacher is responsible for a maximum of 50 children in total or whether they can be responsible for a maximum of 50 children on any given time (with no upper limit across a week).



## Proposal: Limiting the number of children aged 6 to 13 present

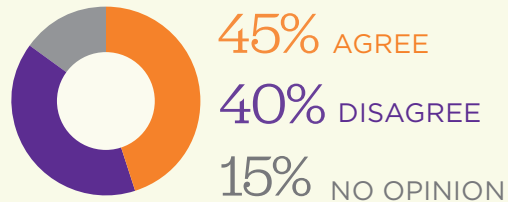
A maximum number of six children (aged under 14) can be present when home-based ECE is taking place. Of those six, up to four can be receiving home-based ECE.

An educator's own children aged 6 to 13 aren't included in that limit. We propose including them.

Educators would have to make sure there was no more than six children aged under 14 present at all times, including their own children.

### What do you think of this proposal?

Results across both the short and detailed survey



### Agree

#### Concerns for quality and safety

Respondents who agreed primarily did so due to concerns around quality and safety. Respondents felt that large numbers of children in the home would reduce the quality of ECE provided to the youngest children. They were also concerned about the safety implications of having too many children in the home, especially for the youngest and most vulnerable. One particular concern expressed was transport capacity in the case of an emergency.

**Parent:** When paying for an education & care service I want the carer to be in the best position possible to do their job. Trying to watch more than 6 kids could compromise their ability to do what they are meant to be doing.

**Visiting teacher:** Many educators I visit have their own children, family members and friends present, many of whom are over age 17 and haven't been vetted. The educators are far too busy with their own and other children to pay attention to the actual children in care. It's chaotic, upsetting and unsafe for the children in care.

### Disagree

#### Potential to exclude educators with large families

Disagreement was driven by concerns that this proposal would restrict or exclude educators with large families. Respondents felt that this proposal would force educators with school-age children out of the sector. Some respondents noted the potentially discriminatory impact of a policy that would effectively cap potential income based on family size. The majority of service providers in their detailed submissions also disagreed with the proposal.

**Home-based educator:** I have 4 children of my own under 14 years. This would severely limit what I could do, and I'd probably have to change career.

#### Benefits of having older children in the home

Other respondents felt there are benefits to having older children in the home while ECE is being provided. These comments focused on the ways in which school-age children were able to help foster a loving whānau dynamic and provide ECE-aged children with a tukana-teina relationship. Respondents also felt that the supervision needs of an educator's own children are low, given they were in the safe and familiar environment of their own home.



**Visiting teacher:** Children in home-based child care look forward to seeing the older children and often connections are built with local schools from a young age which makes their transitions to school so much easier. Whakawhanaungatanga is so important and fostering these tuakana-teina relationships is invaluable.

**Ex support staff member for an au pair agency:** Why should an educator be punished financially if they have a 13 year old who can come home from school, prepare their own snack and go to their room to do their homework? So long as an educator can handle all children present that is fine.

### **Impact on ability to provide home-based ECE, particularly during the school holidays**

Some respondents disagreed out of concerns for the financial penalty educators with school-age children could face under this proposal. There was concern that educators with three or more school-age children of their own would be required to reduce the number of children receiving ECE. Respondents noted that if educators had to restrict their availability to school hours during the school term, the

financial impact would likely reduce the number of enrolments, as parents would remove their children from a service that could no longer meet their scheduling needs.

**Parent:** It will also limit many carers to being only able to offer care between 9 - 3pm, which will impact their income as well as losing clients who require a more full and consistent service.

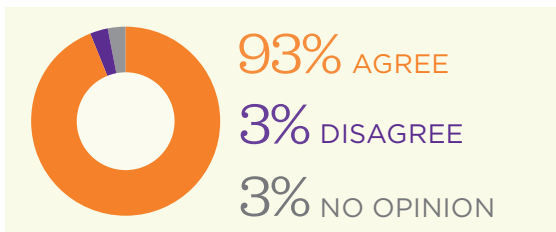
Out of the wider themes from the discussion, concerns about school holidays emerged as the most significant. Commenters shared concerns about how educators, parents, and service providers would be able to manage the large shifts in educators' capacity that would likely occur during school holidays.

**Parent:** I think this would become a big issue during school holidays. An educator could have their own children normally at school and look after 4 under 5s during the day. When it came to school breaks, what would the educator do when their 3 children are now home? It would be someone's child having to be out of the home all day.

# Responses to proposals for change – other proposals

The following responses are only from the detailed survey and written submissions.

**Proposal:** Require service providers to provide ongoing professional development to educators



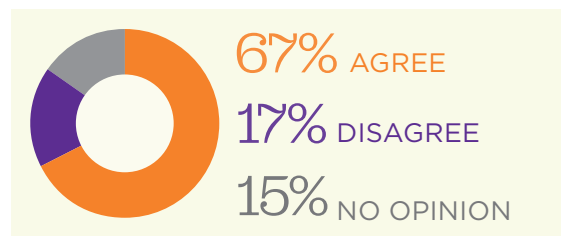
The majority of respondents agreed with the proposal. Service providers indicated that they are already committed to providing educators with professional development and view it as a core part of their role. Educators in face-to-face meetings often talked about the need for home-based specific professional development.

**Barnardos:** The proposal for service providers to provide ongoing professional development for educators should be the current state, as this is already required by the Governance Management and Administration criteria in the Licensing Criteria for Home-based Early Childhood Education and Care Services 2008.

**Home-based Early Childhood Education Association (HBCA):** Our member services are providing levels of professional learning and development currently. This includes professional learning and development which is sourced externally, induction and ongoing mentoring, in-house expertise as well as workshops within home languages.

There were no comments disagreeing with the proposal.

**Proposal:** Create a register of home-based educators



**A register could be a useful tool to screen educators**

The majority of respondents supported collecting information on educators to screen for quality educators and improve health and safety. Respondents considered the register a useful tool that could be used by parents and employers. Some respondents suggested a register could act as a professional record, empowering service providers to screen for quality educators when hiring. Others felt a register could be a tool for safety screening, particularly when parents were seeking a home-based educator.

The majority of service providers also agreed, provided the information could be collected through an automated system to avoid increased administrative costs.

**Home-based Early Childhood Education Association (HBCA):** The Association supports this proposal with an automated and effective system for services to provide this information to the Ministry of Education, such as through the current ELI system.

**A register could create privacy and safety issues**

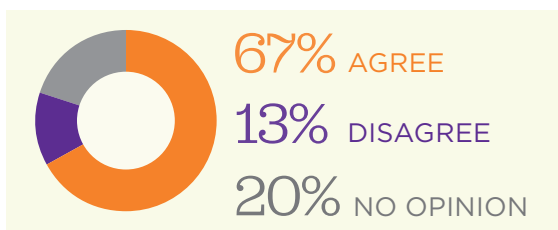
Disagreement was driven by concerns over the impact of a register on the privacy and safety of educators and children. Others were concerned about the duplication of information collection as they were under the impression that this information was already available through current systems. Others noted that with high educator turnover the register would present a significant administrative challenge.

**Kuddles In-Home Childcare & Education:**

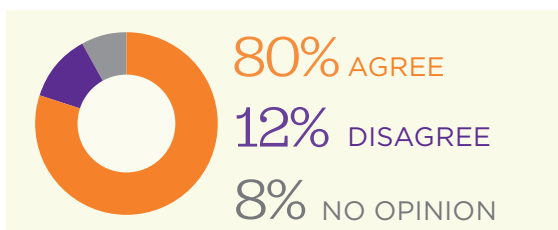
We are unsure what the intent of this register would be as the ELI team already gets a list of our educators with their details for each of our licenses through our management system.

**Proposal: Change the title of coordinator to visiting teacher and better articulate the role to include an explicit emphasis on providing training to educators**

**Change the title of coordinator to visiting teacher**



**Explicit emphasis on providing training to educators**



These two proposals were presented as standalone questions in the detailed survey, but had related goals of clarifying and communicating expectations. As there was significant overlap in the themes from these proposals, responses have been captured together.

**Clear and precise language will help support understanding of the visiting teacher's role**

The majority of commenters agreed with these proposals, as they felt that clear and precise language was needed to help support understanding and consistency for visiting teachers across the sector. Some felt the proposals would bring the visiting teacher's focus onto educators and children, and away from business-related tasks. Service providers indicated that the visiting teacher term was more appropriate as it recognised the teaching and leadership aspect of the role. They also indicated that visiting teachers already provide training to educators.

**Te Kōhanga Reo National Trust: TKRNT**

considers that changing the name from co-ordinator to kaiako/visiting teacher provides a broader context to embrace diversity.

**Visiting teacher:** Make sure visiting teachers are protected, and that their role of visiting teacher is not overpowered by other responsibilities which should be on the homebased business.

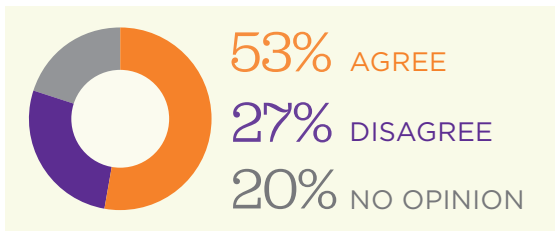
**Some commenters preferred a different title**

Commenters who disagreed did so because they preferred a different title to visiting teacher, or did not feel the name was important.

**Amanda's Home Based Childhood Care and Education:**

In our service we use the term Educational Team Leaders... They are not visiting teachers as we believe the term, although common within the sector, implies that the teacher is a visitor or honoured guest, and that she teaches. Neither of those things are true.

**Proposal:** Clarify that visiting teachers are not permitted to act as a person responsible across multiple licences at the same time



**It is important for educators and visiting teachers to maintain consistent relationships**

The majority of respondents agreed with this proposal and considered it important for educators and visiting teachers to maintain consistent and responsive relationships. Other respondents felt this proposal would support visiting teacher wellbeing, by reducing workload.

**Visiting teacher:** I think this needs to be legislated as I have experience working across networks and have found it very difficult to support those nested reciprocal relationships in these circumstances.

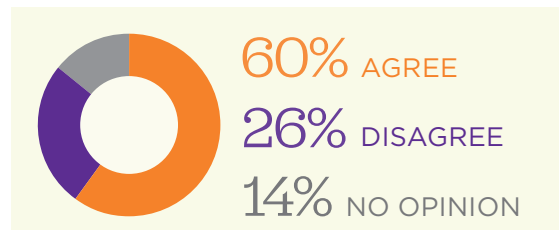
**Visiting teachers working across licences supports flexibility, particularly for smaller services**

Those who disagreed felt that allowing visiting teachers to work across networks enables flexibility with coverage and travel. They felt that having visiting teachers across networks was particularly beneficial for smaller licences, made the time spent travelling more efficient, and helped when a visiting teacher needed time off.

Some noted that educators can progress from a standard to quality rate after gaining a qualification, and these educators would be unable to maintain the same visiting teacher relationship through the licence change. Some respondents noted that different visiting teachers may have different skill sets, such as language skills, and felt it would be an advantage to continue to allow visiting teachers to work across licences to fully utilise those skills.

**Home-based service provider:** As long as visiting teachers (unless they are on holiday) have a group of educators and children that they regularly visit and do not change monthly, working across more than one license should not matter. For example, A Korean speaking visiting teacher has her own group of Korean speaking educators and children in the standard service can also have some Korean speaking educators who are qualified and are in the quality service as currently both services are required to be separate.

**Proposal:** Require each licence to list the homes on that licence



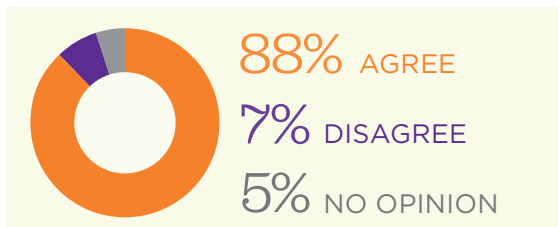
Commenters generally agreed with this proposal, citing a positive impact on safety.

**Home-based educator:** The ministry having the list of addresses could be helpful in emergency situations.

Those who disagreed felt it would be a significant administrative burden, particularly in light of high educator turnover. Some service providers questioned the feasibility of collecting information in a timely manner. Service providers mentioned that this information was already available upon request. Some respondents were concerned with privacy rights.

**Home-based service provider:** By asking each license to list the homes on that license this would require significant resourcing from the Ministry and service providers. Again, I am unsure of the exact benefit this would provide. Given that it currently takes 6-8 weeks to process any licensing changes how would this work in practice?

**Proposal:** Clarify that police vets are required on all adults who may live and/or be present in the home



Commenters generally agreed with this proposal, citing a positive impact on children's safety.

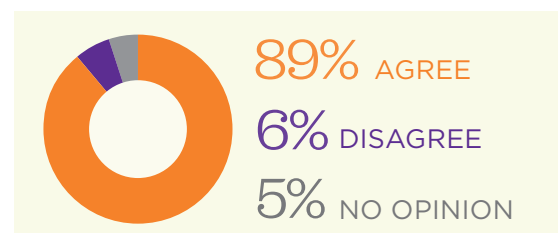
**Home-based educator:** I would want all of the adults in a home police vetted if I was putting my children into homebased care with an educator, it's an easy step to help safe guard our children.

Those who disagreed felt that the time and administrative burden of police vetting all adults would make the proposal infeasible. However, these respondents appeared to have misunderstood the proposal, which was aimed at clarifying existing obligations rather than extending police vetting requirements to short-term visitors. Written submissions from service providers highlighted confusion around who is required to be police vetted.

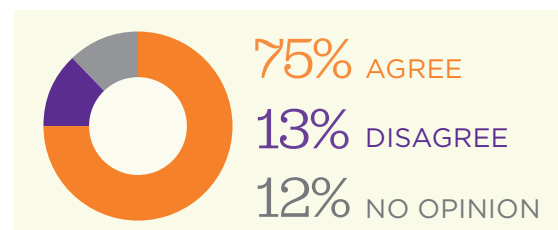
**Home-based service provider:** He Po Tātaki states that every service should be catered to according to their unique situation, but time and time again Homebased providers are held to a higher standard or measured in the same way you would a day care or kindy, when they are entirely different. You wouldn't ask every parent who steps foot in a daycare to undergo a police check, so why are these expectations higher when they are taking place in the family home?

**Proposal:** Require service providers to provide training for visiting teachers and educators on the health and safety regulations and require health and safety training included in educator qualification

**Health and safety training from provider**



**Health and safety prerequisite of qualification**



These two proposals were presented as standalone questions in the detailed survey, but responses had significant overlap so have been captured together.

The majority of respondents agreed with these proposals, with no clear drivers of agreement or disagreement.

**Visiting teacher:** Health and safety training for staff and educators (including regular refreshers) is definitely needed to ensure a consistent standard is being met across the variety of educator's homes.

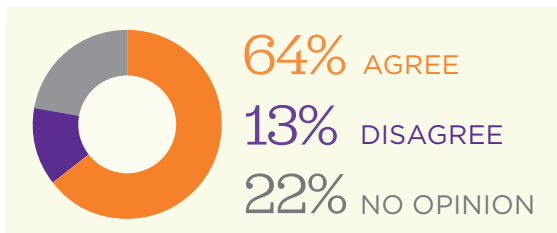
Many service providers mentioned they already included health and safety training as part of educator and visiting teacher requirements. Service providers also pointed out that health and safety is covered in the Level 4 ECE qualification.

**PORSE Natural Childcare:** There is comprehensive health and safety included in the New Zealand Certificate in ECE (Level 4). If this was introduced as a minimum standard for all new Educators, health and safety would inevitably be covered as a part of it.



**Proposal:** Change the definition of ‘service provider’ in the Education Act 1989

The current definition does not frame service providers as overseeing and supporting educators’ work. Changing the definition of service provider would more closely align with the Government’s expectations that service providers are responsible for education and care.



The majority of respondents agreed with this proposal, believing the change would bring an appropriate focus onto the educational value delivered by service providers.

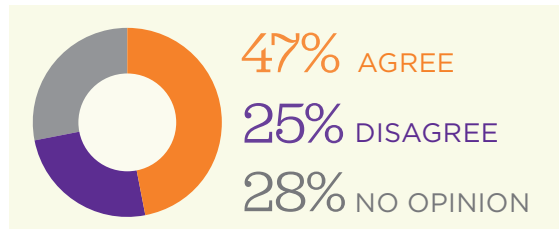
**Anonymous:** Service providers should be responsible for the delivery of education and care as they are holding the licence and receiving the funding to provide this education and care. Making service providers accountable for the education and care children receive will help to ensure that they use the funding wisely.

Those who disagreed felt the proposal would have no benefit. Many service providers requested more information on the proposal. They outlined that definition changes need to be considered very carefully, taking into account legal advice from other related government departments.

**PORSE Natural Childcare:** We think this needs to be carefully considered to ensure there are no unintended consequences with any word changes and that no undue obligations around employment, tax or health and safety are placed on service providers with any changes. We would recommend that any definition changes are thoroughly considered with legal advice and advice from other agencies who also regulate the sector including IRD, MBIE and Worksafe to ensure the consequences of any changes are clear and intended before any implementation.

**Proposal:** Change the definition of ‘home-based education and care service’ in relation to the phrase ‘gain and reward’

Currently, a ‘home-based education and care service’ is defined as the provision of home-based care for ‘gain or reward’ in the home. The interpretation of ‘gain or reward’ may contribute to the minimal payments educators receive, and a different definition may align better with the Government’s expectations that educators are fairly paid for their work.



The majority of respondents agreed with this proposal, suggesting it is important to set clear pay expectations for educators. Service providers tended to agree that educators should be paid fairly.

**Visiting teacher:** I think that Educators should be fairly paid for the work they do. Caring for young children is such a pivotal role and is vital when caring or and educating our next generation.

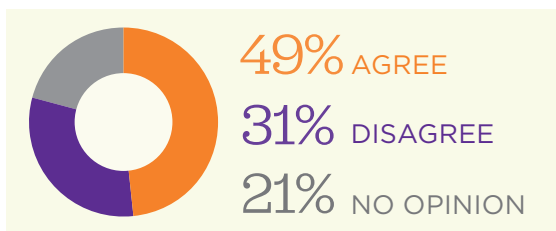
Those who disagreed with the proposal felt that some educators, such as grandmothers, do not have expectations of a certain level of pay, and are happy to provide home-based ECE with minimal compensation. Some service providers felt the current system works well and it should not change, because educators agree to their remuneration rates.

**Home Early Learning Organisation (HELO):** What does ‘fairly paid’ mean? What is the issue here? As we do not think that current Educators feel as if they are not fairly paid for the work they do given it is generally negotiated between them and the family directly.

## Transparency of funding

The quick survey asked a general question about transparency of funding, and drew attention to the specific proposal where services would need to show the level of government subsidy a child receives on invoices to parents. The detailed survey and written submissions focused on the detail around all three of the transparency of funding proposals, including the two proposals below.

**Proposal:** Require services to publish information on government subsidies based on examples of an average child



The majority of respondents agreed with the proposal, and felt that publishing examples would provide useful information, and hold service providers more accountable. Service providers felt as though this proposal, if it were to be implemented, should apply to all service types.

**Parent:** Knowing what subsidy they are actually receiving would be helpful. We currently pay a higher rate than normal because it feels criminal to pay such a low hourly rate.

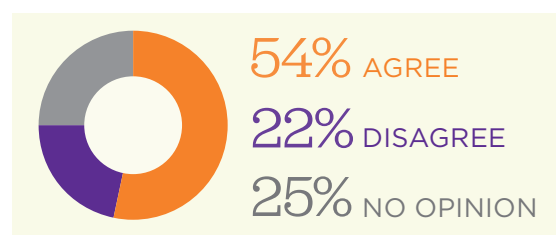
**PORSE Natural Childcare:** This is a change that, if implemented, needs to be implemented across all ECE service types and not just for home-based ECE. It is unfair to put this level of transparency in for home-based services and not for the other service types.

Those that disagreed felt that the proposal would cause misunderstandings and conflicts between parents and service providers or educators. Others disagreed as they felt this information was already readily available.

### **Bright Futures Home Based, Child Care and Learning:**

Government rates and subsidies are already public. Parents won't care what government subsidies are supporting their childcare and early learning arrangements for their children.

**Proposal:** Require all services to report on income and expenditure per licence, with additional prescribed categories



The majority of respondents agreed with this proposal, making general statements of agreement.

**Home-based educator:** I feel that there should be some transparency on the government funding levels and where that money goes. I feel some services are keeping a lot of the bulk funding money as parent fees cover the cost of the educator wages (in some cases educators get less than what the parent pays). So having an understanding of where this money goes would certainly encourage accountability for the companies.

Those that disagreed tended to feel that the proposal would cause conflict between parents and service providers or educators. Some service providers who disagreed did so because they felt as though the proposal would incur substantial compliance costs.

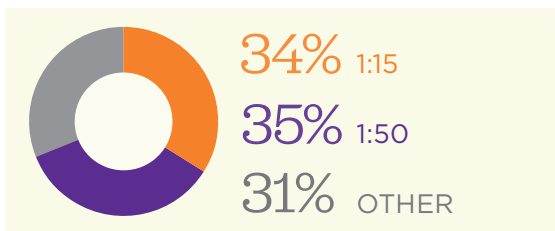
### **Inspired Kindergartens & Home Based Service:**

It will cause administrative problems especially for kindergarten associations and other multi service providers. Accounting systems are not necessarily set up by licence.

## Changing the licence size

Respondents could select from three options regarding proposed changes to licence size:

- » A maximum ratio of one visiting teacher to 15 educators, with a licence maximum of 60 children.
- » A maximum ratio of one visiting teacher to 50 children, with a licence maximum of 50 children
- » Other, with a request to specify their preference



### Proposal: One visiting teacher to fifteen educators (licence maximum of 60 children)

Preference for this option was driven by a desire to improve quality. Respondents felt that smaller ratios would enable visiting teachers to provide greater support to educators, and drive better outcomes for children.

**Te Kōhanga Reo National Trust:** Fifteen educators are more manageable for visiting teachers resulting in better support than the other alternative where a visiting teacher could potentially have a maximum of 50 educators.

Service providers tended to feel as though this option was not financially viable. This was because some educators, such as au pairs and nannies, typically care for one or two children. The proposal would thus result in licences with fewer children than under current settings.

**Nurture Nannies:** The proposal of a ratio change from children to educator focus is absolutely inefficient for a service like ours with an often 1:1 ratio in a high proportion of homes... This should only apply to homebased Educators with multiple children, the diversity of services like ours has been unaccounted for.

### Proposal: One visiting teacher to fifty children (licence maximum of 50 children)

Preference for this option was driven by a belief that a child to visiting teacher ratio would be more effective than an educator to visiting teacher ratio. Respondents tended to select this option out of concern that a ratio based on number of educators would penalise services with a high proportion of nannies, au pairs and family member educators. They felt that the number of children, rather than educators, more accurately reflects the demands on a visiting teacher's time and energy.

**Member of the wider early learning sector:**

I believe a maximum ratio of one visiting teacher to 50 children would be best and fairest for all types of home based care.

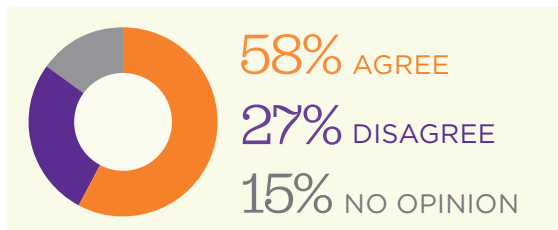
### Other options suggested

There were a variety of suggestions for other ratio options. Some respondents wanted no change in the current visiting teacher or licence ratios. Others suggested options with a licence maximum of fewer than 50 children.

Service providers in particular tended to suggest a licence maximum of 150 children, with a ratio of one visiting teacher to 50 children. Service providers felt as though increasing the licence size would be advantageous as it would allow for visiting teachers to work together within licences. Some service providers pointed out this ratio would also align with the broader early learning sector.

**Pioneers Homes-based Education:** Increasing the maximum licence size to 150 will align us with the rest of the sector. Centre based services (kindergarten and childcare) currently are able to operate at a maximum of 150 children with regulated teacher ratios.

**Proposal:** Require services to list the educators on each licence



The majority of respondents agreed with this proposal and anticipated it would increase accountability for both educators and service providers. Respondents were concerned that service providers are able to move educators between licences prior to ERO reviews. Some also hoped that this information would highlight to regulators those educators who frequently move between providers. Some service providers pointed out that the information was already readily available.

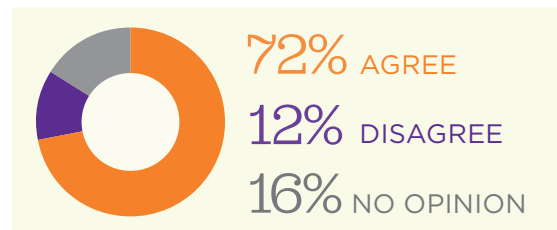
**Parent:** This might help stop fraudulent practices.

**Barnardos:** We support the inclusion of educators on the licence. We recommend a simple process for services to enable this, for example via ELI or online service register.

Service providers were split on this proposal. Disagreement tended to be driven by concerns about the administrative burden of implementing this proposal, especially given the high turnover of educators.

**Early Childhood Council:** This seems to be highly impractical and would add yet another layer of complexity and paperwork. It would entail changes to the licence every time staff change took place. It would also be another aspect where the practice would differ between teacher-led ECE centres and home-based ECE.

**Proposal:** Require services to list the visiting teachers on each licence



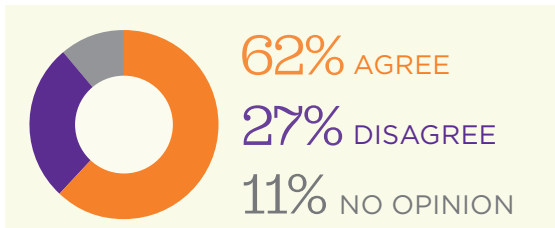
The majority of respondents agreed with this proposal and felt it would improve transparency and accountability, and help to ensure that ratios were adhered to.

**Home-based service provider:** This will give clarity to the Ministry or Person Responsible for each license

Disagreement was driven by concerns about the administrative burden of implementing this proposal.

**Home-based service provider:** This would just bring about 1,000,000 paperwork changes each week and bog the Ministry down when time is better spent on other initiatives. This information is better recorded through student management systems with reports able to be printed and submitted as and when they are required.

**Proposal:** Change the Education Act 1989 so that ERO has the power to enter homes to observe educators providing education and care



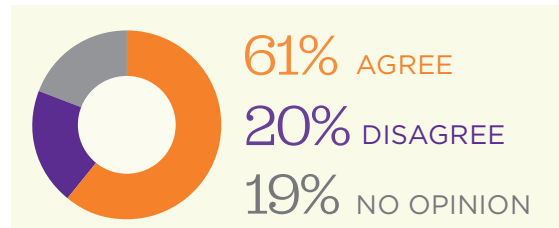
The majority of respondents agreed with this proposal and felt it was important for ERO to gain insight into actual in-home practices. These respondents felt that the current review system does not give reviewers a complete picture of home-based ECE. Some were excited at the opportunity to showcase great ECE, and thought this proposal would ultimately help improve regard for the home-based sector. Service providers pointed out that this proposal could help providers and educators to improve their practice.

**Visiting Teacher:** We support this proposal and think it is good for ERO to see educator and their practise. It should not be judged just looking at the portfolio and paper work.

Respondents who disagreed believed the proposal would interfere with privacy and property rights of educators or that the current review system was adequate. One submitter mentioned concerns that ERO lacked the cultural capability required to adequately undertake home visits.

**Te Kōhanga Reo National Trust:** The Trust's role is to uphold the mana and integrity of the kaupapa first foremost. In our view if the home-based services Kainga Kōhanga Reo co-exists with a Kōhanga Reo, then the current role of ERO is sufficient and the assurance should be reviewed at that point. ERO in our view should not need to enter homes for the purpose of observing the educators.

**Proposal:** Provide ERO with an increased role to undertake an external evaluation for new services before they move to a full licence



The majority of respondents agreed with this proposal, primarily out of a desire to increase oversight and support for new licence holders. Service providers who agreed outlined it would be beneficial to provide ERO with this power for all ECE service types. Respondents also pointed out that ERO would require more resources for this to happen effectively.

**Visiting teacher:** I think services need to be more accountable. I also think increasing ERO's role and relationship with the licensing process would provide more consistency and improve quality outcomes for tamariki.

Disagreement was driven by the feeling that additional evaluation of new services was unnecessary. They believed this would likely result in duplication of administrative tasks for little benefit.

**Service provider:** ERO visiting during probationary licence is currently problematic given the variation of practice across MOE regional offices and ERO. New services are developing systems in their first year, it would be unfair, and unnecessary to expect them to also have to be part of an ERO Review.



## Further comment on licensing

### A desire for increased regulatory enforcement in the home-based ECE sector

Many respondents wanted increased regulatory enforcement in the home-based sector. While many of these comments reflected a desire for greater scrutiny of providers' and educators' practices, respondents were less focused on merely identifying poor performers, and more interested in developing a regulatory system with both the means and the will to enact sanctions against poor quality or unsafe members of the sector. Many felt that the current system does not effectively penalise poor practices in the sector, including unethical or profit-seeking practices. They wanted low-quality educators to lose their jobs, and low-quality service providers to lose their licences.

**Home-based service provider:** We have enough regulations currently to allow for excellence in Homebased ECE. However they are often not enforced and some services fly under the radar so to speak. Sometimes a service will get an awful ERO report and the Ministry of Education bend over backwards to make sure the service improves its practice. THIS NEEDS TO STOP. If a service provider cannot meet all of the regulations the service should be SHUT DOWN, until they can prove otherwise.

Some respondents discussed the role of the Ministry and ERO in providing oversight of the sector. These respondents wanted more intensive and more frequent reviews of home-based service providers. Some were concerned that the interval between reviews allowed service providers to implement substantially different and lower-quality practices during that interval.

### Lack of consistency between the Ministry and ERO

Other respondents were concerned about a lack of consistency between the Ministry and ERO, and between regional offices of those agencies. These respondents felt that different offices and different agencies were interpreting and applying regulations differently. Some noted the difficulties this created when a provider acquired a licence in a new geographical area.



# Other comments and themes raised in responses

## Increased funding for home-based ECE

Many respondents and service providers wanted funding for home-based ECE to be increased overall, or aligned with the rest of the early learning sector.

Some respondents felt that funding rates specifically for children aged two and over needed to increase. These respondents were concerned that such sharp changes in funding rates based on age caused problems for service providers, educators, and parents. They felt that a more level funding system across ages would be more effective.

## Home-based ECE's role in the wider early learning sector

Many respondents felt strongly that home-based ECE is a valuable and quality part of the early learning sector. These respondents highlighted low ratios, family-feel and flexibility offered to working parents as particular strengths. Some respondents discussed the value of home-based specifically for migrant communities, highlighting the fact that other ECE types cannot offer the same language or cultural immersion available through home-based ECE.

## Not enough information provided

A common theme, particularly from written submissions, was that there was not enough information in the discussion document to allow submitters to comment on the proposals effectively. A particular concern was that the discussion document did not outline the costs associated with implementing each option, with submissions often intimating that cost information would add nuance to the document and help aid the consultation itself.

## Proposals did not consider the needs for Māori

There was concern that the Kōhanga Reo qualification, Te Tohu Whakapakari, is not recognised across the early learning sector. Hence, kaiako with this qualification are unable to become registered and certificated teachers. On a similar note, there were concerns that the qualification requirements would prohibit Kōhanga Reo from leading and coordinating the delivery of home-based ECE.

Further, the Review's proposals were criticised for adopting a "Pākehā mindset which assimilates and essentially perpetuates a colonisation process which has devastating effects on communities". On a similar note, submissions indicated that the proposals did not address the needs of disabled Māori children, and does not prioritise Māori leadership within the development of the home-based educator workforce. In an effort to help with some of these issues, one submission suggested conducting research into diversity in home-based services and understanding how the scale of funding rates might accommodate some richness and variation in the sector.

## Other models of home-based ECE proposed

Mike Bedford, a PhD candidate specialising in ECE environments, proposed a new model of delivering home-based ECE. Under the '2:8 model', two adults would be able to care for up to eight children in a private home setting. In these circumstances at least one of the adults would be a qualified teacher, while the other would complete training. It was suggested that there should be a working group to consider the concept and engage in discussions with the home-based sector.





**Kōrero Mātauranga**  
Me kōrero tātou

**Have your say about  
the future of education.**