

He taonga te tamaiti – Every child a taonga

Strategic plan for early learning 2019 – 2029

Overview

New Zealand Kindergartens (NZK) *Te Putahi Kura Puhou o Aotearoa* welcome the opportunity to respond to the draft strategic plan for early learning *He taonga te tamaiti – Every child a taonga*.

Our vision is for a strong and enduring future for kindergarten. We support a high-level, coherent vision for education in Aotearoa New Zealand where early childhood education (ECE) services me ngā kohanga reo are central to the system.

We believe access to high quality early childhood education is a right for every child. We see each child being at the centre of our decision-making and endeavour, and a system that meets the aims and aspirations of children and whānau as they progress. We want education policy designed to be fit-for-purpose alongside the concept of policy being across years 0 – 18 years rather than within a sectoral, age-defined or historical construct.

What happens in early childhood education makes a difference for a lifetime and so it needs to be included in overarching educational system design. The system design needs to ensure seamless inclusion and transition for tamariki, curricula, Learning Support and overall alignment with the Tomorrow's Schools and other change processes in the sector.

We have ambition for early childhood education in Aotearoa New Zealand. We expect every child and their whānau will have the opportunity to experience and participate in exceptional education in their community that is rich in their culture and meets their aspirations and dreams.

Introduction

A loosely linked kindergarten movement emerged across the city settlements of colonial New Zealand in the late 19th century. It embraced a range of initiatives by individuals, schools and welfare societies and the first kindergarten organisations were established. This fledgling movement spearheaded various campaigns to establish a system of kindergarten education, separate to school, for young children up to 8 years.

In 1926 the New Zealand Free Kindergarten Union Inc was legally constituted. This decision set the shape and future direction of kindergartens and has seen the kindergarten movement thrive for the past 93 years.

New Zealand Kindergartens *Te Putahi Kura Puhou o Aotearoa* (NZK) represent 25 of the 30 regional kindergarten associations nationwide.

Kindergarten associations are incorporated societies and registered charities. As not-for-profit, community based organisations all funding received from Government and its agencies, parents and the community is used to engage children and their families in high quality teaching and learning.

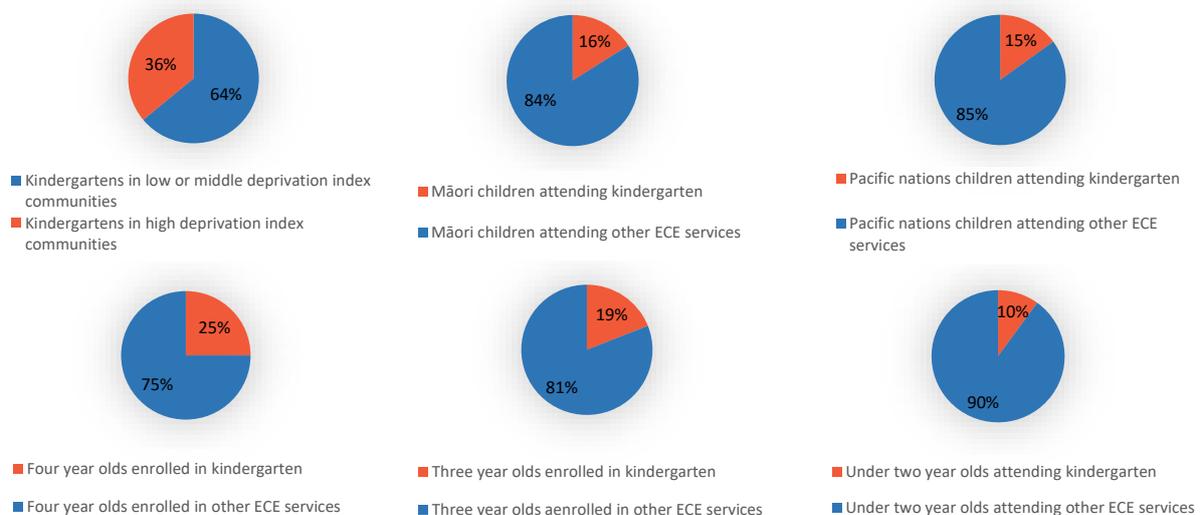
Associations are governed by a board, generally a mix of elected and appointed members of the community and have management and professional leadership structures in place. Associations have built the capacity and capability to ensure a consistently high level of support for teaching and learning, to meet community aspirations, and to ensure public accountability for the funding received.

Collectively, kindergarten associations employ around 4000 qualified teachers. All teachers meet the same Teaching Council of Aotearoa New Zealand qualification and practising certificate standards and requirements as qualified teachers in schools.

Kindergarten teachers are covered by the State Sector Act and have pay parity with their school teacher colleagues reflected in the national collective employment agreement.

Nationally our associations provide around 460 kindergarten and early childhood education (ECE) services with over 20,000 children and their families and whānau participating on any given day. The majority of our services are kindergartens operating all-day licenses. Most offer a six-hour 'school day' session with some offering morning or afternoon sessions within that school day. There are currently 12 kindergartens offering long-day services, and a number our kindergartens are open all-year. Several associations operate services complementing kindergarten including home-based services and play groups, holiday programmes, and some operate education and care services.

Across the kindergarten movement the majority of kindergartens (64%) are in low or middle ¹ deprivation index communities. Of Māori children enrolled in a service, 16% attend kindergarten and of Pacific nations children, 15% attend their local kindergarten. Of four-year olds enrolled in an ECE service 25% attend kindergarten, and 19% of three-year olds. Ten percent of children attending a kindergarten are two-years old. ²



¹ 419 (64%) kindergartens are in deprivation index communities 6 - 10, and of those 280 (69%) are in indices 8 - 10.

² <https://www.educationcounts.govt.nz/statistics/early-childhood-education>

Approach to the Submission

We commend the Government for developing a 10-year strategic plan to ensure high quality ECE provision and the planning, resourcing and innovation to realise that aim. We urge Government to invest additional funding within the system and to support kindergarten as the public provider of early childhood education to ensure the aims of the plan can be realised.

We acknowledge Te Kōhanga Reo National Trust and its claim with the Crown and we respect that process.

In this submission we respond to each of the goals and recommendations set out in the draft plan, and present strengthened or additional recommendations for consideration. Our comments primarily relate to teacher-led, centre based ECE services. Our reference to 'teachers' means qualified and certificated teachers registered with the Teaching Council of Aotearoa New Zealand.

While the draft plan sets out a range of initiatives to improve quality ECE, **our top priority is 100% qualified teaching workforce**. We recommend:

- funding to meet the costs of services operating with 100% qualified teachers be reinstated in 2019
- all teacher-led, centre-based services be required by regulation to employ 100% qualified teachers by 2023.

The timing around the implementation of the plan is critical if we are to realise the goals set out in the plan for children, their families and whānau, for services, for communities and society, and for Government.

General Comments

The draft plan describes the context within which it is set: our partnership obligations set out in Te Tiriti o Waitangi, high and growing participation rates across diverse ECE services, and the impact of changes within our society. However, the plan fails to position ECE as part of the Government's wellbeing strategy and to the broad education 'conversation' and reform agenda. It makes no effort to position ECE within the education eco-system. It limits reference to the wider education sector and system to transitions, and largely ignores the fact that over 21,000 qualified teachers in ECE are part of the teaching profession. ECE is part of the education system continuum and to separate it from the compulsory sector, exacerbates the disconnect already evident in policy development and Government practice and limits the potential benefits of the education reforms.

The plan does not provide any specifics about Maori immersion education outside of Te Kōhanga Reo. Approximately 27% of children attend Kohanga Reo and 20% attend kindergarten. Given our commitment to Treaty partnership we believe that consideration should be given to Puna Matauranga with appropriate resourcing as part of Government Treaty obligations.

A number of the recommendations in the plan refer to the Ministry of Education (the Ministry) initiating or leading the change proposed. Past and current experience suggests this may not always be the best way to effect change³. If the Ministry continue to take a lead, the approach to the implementation of all initiatives in the strategic plan need to be co-designed and agreed across stakeholders rather than being solely the responsibility of the Ministry. Further, should the recommendations of the *Tomorrow's Schools* review be implemented, and education hubs are established, the plan will need to make provision for the continued successful implementation of the recommendations, notably those assigned in the plan to the Ministry and to the Education Review Office (ERO).

The Government's objectives for education are made explicit within the terms of reference for the strategic plan. They relate to:

- learners at the centre
- barrier free access
- quality teaching
- quality public education
- 21st century learning.

While some of the recommendations may contribute to achieving these objectives, the plan falls short on recommending how the objective for public education on a broad scale, will be achieved. There are a number of ways the Government can achieve this goal including:

- targeting initiatives set out in the plan to community-based services only
- placing conditions on providers for the receipt of central Government funding
- supporting kindergarten as the provider of public ECE
- supporting community-based services to integrate to a public system
- centralising the payment of ECE teachers' salaries.

Public Early Childhood Education

We see the kindergarten movement as the provider of public early childhood education. Kindergarten meets the prerequisite conditions which separate public from private sector organisations. It is a not-for-profit service and registered charity. We have well-established and supported networks of services operating nationally. We provide public education when viewed alongside the compulsory sector.

Specifically, we:

- employ qualified and certificated teachers
- require the same base qualifications for employment
- are covered by the State Sector Act
- have salaries and terms of conditions negotiated by the Ministry of Education
- support professional advisors of teaching and learning to work alongside teaching teams
- have kindergartens across communities with nearly half on school sites and many adjacent to their local school
- have governance structures in place.

³ The Ministry's approach to engaging ECE services in Kāhui Ako

As a public provider, kindergarten has the ability to meet the plan's aims and aspirations including expanding wrap-around services, providing management and Government support, establishing services on Crown land, establishing innovation hubs, and supporting collaboration.

We recognise we need to assure Government of our collective capacity and capability to deliver the aim of public provision by:

- being a leader in pedagogy and innovative practice – for example centres of innovation and excellence
- advancing the Government's agenda for education including around language, identity and culture
- demonstrating expertise in effective transition partnerships and leading practice in the first years of schooling
- demonstrating strong community connections and alliances – for example with iwi, churches, schools, social sector and local Government
- being able to set up new services, particularly in areas of high need
- meeting expectations that ECE services support labour market needs and the needs of diverse and complex communities including refugee and migrant communities
- demonstrating the relevance of current and new services within local communities including social service hubs
- ensuring the infrastructure to work alongside and report to Government is in place.

The kindergarten movement can meet that challenge and seeks to work with Government to be recognised and supported as the provider of public early childhood education.

Recommendations

Goal 1: Quality is raised for children by improving regulated standards

1.1 Regulate new adult: child ratios for infants and toddlers - we support the intent of this recommendation.

In addition we recommend:

- the new ratios come into effect after the qualification requirement for teacher-led, centre-based services has been achieved in 2023
- the new regulated ratios be teacher: child ratios for teacher-led, centre-based services
- the 1:3 teacher: child ratio for under two-year olds be given effect in the plan.

We recognise the research evidence and welcome the recommendations to improve ratios for under two-year olds (1:4) and for two-year olds (1:5). Much has been written about the importance of 'good' ratios and a number of OECD countries have led the way ahead of Aotearoa New Zealand. We understand ratios alongside group size and qualified teachers intersect to represent the 'structural' aspects of high quality and each need to be present to provide optimal benefit.

Improved ratios will require a significant number of new staff to be employed. The draft plan sets out to improve the quality of services and the outcomes for children and whānau. A key aspect of high quality ECE is a fully qualified teaching workforce. It makes no sense to introduce new ratios knowing those positions could be filled with unqualified staff. To do so would exacerbate the current situation of unqualified staff working with young children. This would undermine the intent of the plan. We recommend the 100% qualified target be met by 2023, at which time the ratios would come into effect. At that point, the regulations would establish the ratio as a 'teacher: child' ratio rather than an 'adult: child' for teacher-led, centre-based services.

Achieving a ratio for under two-year olds of 1:3 should be factored into the plan for implementation during its term rather than set out as an aspirational goal with no specific timeframe.

1.2 Require early learning services to support secure and consistent relationships for children -
we support this recommendation.

Teachers have a professional responsibility to ensure the well-being of young children which includes secure and consistent care. We recognise the importance of positive transitions. Before establishing an expectation to demonstrate how these relationships support children, there needs to be a common understanding of what 'secure and consistent' means and 'looks like'.

The Ministry simply 'identifying effective practices' as stated in the plan will be insufficient to effect change. This will need to be part of a wider and more comprehensive professional learning and development (PLD) strategy across the profession. [Ref: 3.3]

1.3 Incentivise for 100% and regulate for 80% qualified teachers in teacher-led centres, leading to regulation for 100% - we support the intent of this recommendation.

In addition we recommend:

- funding to meet the costs of services currently operating with 100% qualified teachers be reinstated in 2019
- regulation for 80% qualified teachers in teacher-led, centre-based services comes into effect by 2021
- regulation for 100% qualified teachers in teacher-led, centre-based services comes into effect by 2023
- NZK meet with the Ministry by 1 April 2019 to discuss ways to meet the 100% regulated target by 2023 with a view to including agreed recommendations in the report on this consultation process to the Minister of Education and to Cabinet.

There are just over 30,000 adults in ratioed or 'teaching' position in ECE services and of those, almost one third are unqualified as teachers.⁴ Education and care services account for 84% (25,755) of the total ECE staff in 'teacher-led' services of whom 64% (16,526) are qualified teachers. In February 2018, the Minister announced the number of people entering initial teacher education (ITE) had dropped dramatically between 2010 – 2016. For ECE, this meant a reduction of almost 47% from 6760 to 3615 students.⁵

⁴ Ministry of Education (2018) *The national picture: what does the ECE census 2017 tell us about ECE teaching staff*

⁵ Hon Chris Hipkins, Minister of Education *Chronic teacher shortage laid bare* Media statement. 27 February 2018

The first ECE strategic plan *Ngā Huaraki Arataki* allowed 10 years to reach the target of a fully qualified teaching workforce in teacher-led, centre-based services: 80% by 2010 and 100% by 2012. At that time, while kindergarten teachers were all qualified and registered teachers, fewer than half the workforce in education and care services were qualified teachers.⁶

Incentives were put in place for services to support adults to upgrade their qualifications and achieve full teacher registration.⁷ ITE providers were clear on Government policy intent and were funded to work within those parameters and the numbers of qualified teachers increased steadily over that time.⁸

A new funding system was introduced in 2005 that increased funding in 'bands' according to the number of qualified teachers in ratio. The top band was for services with a 100% teaching team. However, the fact that regulations stated only 50% of adults had to be qualified teachers disincentivised many services to support staff to become qualified teachers or to employ qualified teachers above the minimum requirement.

The 10-year timeframe increased the risk of the policy being undermined or changed as a result of the political cycle. This happened in 2010 when the sector was on track to reach the 100% target by 2012. The Government of the day dropped that target and the funding to achieve it. The top funding rate for 100% was cut - which for kindergarten meant a drop of 14% in funding. The Government effectively said that 80% qualified teachers in ratio was 'good enough.' It is unthinkable that we would let this situation be repeated.

Since 2010, the number of students entering ITE has reduced dramatically. The percentage of qualified teachers employed in the sector in 2017 as a proportion of the total number of staff was less than it was in 2011.⁹

Regulating 100% qualified teachers by 2023 requires four key aspects to be addressed:

- changing ECE regulatory and funding settings in relation to an ECE qualified teaching workforce
- retaining teachers who hold a teacher education qualification and are currently employed in a teacher-led, centre-based service
- supporting adults currently employed in ratioed positions in ECE services to gain a teacher education qualification
- ensuring a pool of qualified and certificated teachers is available for the future.

We have identified a number of actions to be put in place under each of these four categories and propose we meet with the Ministry by 1 April 2019 to set out these ideas for inclusion in the report on this consultation process to the Minister of Education and to Cabinet.

⁶ Ministry of Education. *Education Counts* Time series 2002 - 2014. In 2002, 3944 (39.4%) qualified staff employed in education and care services = 1928 (43.7%) qualified staff in community-based services, 2016 (36%) qualified staff in privately owned services

⁷ Including differentiated funding to incentivise services and support staff to upgrade their qualifications and to retain qualified teachers in services with 100% qualified staff, provisionally registered teachers (PTR) grant to support newly qualified teachers to become registered, support to access initial teacher education eg: grants and scholarships.

⁸ In 2002 of the 12,237 staff employed in the ECE sector 5,953 (48.6%) were qualified teachers. In 2010 there were 19,907 people employed in the sector, 13,298 (66.8%) were qualified teachers.

⁹ Ministry of Education *Education Counts* Time series 2011 - 2017. In 2011 - 20,117 staff employed in the sector 14,276 (70.9%) qualified teachers; 2014 - 25,284 staff employed 18,857 (74.5%) qualified teachers; 2017 - 30,674 employed 21,056 (68.6%) qualified teachers.

1.4 Develop advice on group size, the design of physical environments and environmental factors - we support the intent of this recommendation.

In addition we recommend:

- the plan includes a commitment to implement the advice received on improving quality standards.

A considered examination of the relationship between group size and wider environmental issues is long overdue and we welcome the development of advice. We believe that the group size should represent the maximum number of children in any one space at any one time. Children should never be in a group that is bigger than is age group appropriate. It concerns us that centres with licenses of 50 plus tend to institutionalise children at a time when we should be supporting their creativity and development as an individual.

The plan must set out a commitment to make any necessary changes should these be advised albeit the financial implications of regulatory changes will need to be considered. It is proposed the advice will be developed in 2019 in which case implementation could be phased in over the period of the plan. There is simply no point in developing advice if the advice is not genuinely considered and implemented.

1.5 Gazette Te Whāriki to support shared expectations - we support this recommendation.

The plan sets out a child's right to 'experience a rich and responsive curriculum which offers time, space, materials and relationships that enable them to learn and thrive ... purposeful interactions ... extending children's interests, capabilities, and participation.'¹⁰ Gazetting the full framework of *Te Whāriki* would set out clear expectations for every child, their family and whānau, and for the education and wider community about what they should expect from ECE. It would also create clear expectations and strengthen accountability for teachers, kaiako, educators and other adults about their role and responsibilities. In addition for teachers, the expectations would sit within the professional standards and codes of practice and professional responsibility.

1.6 Prevent low quality service providers from opening additional services - we support the intent of this recommendation.

In addition we recommend:

- criteria to determine the suitability of services to provide expanded services be strengthened to include any service provider expanding and/or opening a new ECE service.

We endorse the idea that unless a current service provider can satisfy the Ministry it is well-placed to deliver services to the level expected, (which should be publicly disclosed for transparency and consistency) that it should not be granted a licence. However, we see no reason why this provision would not be extended to all providers looking to expand and/or set up a service.

¹⁰ Ministry of Education (2018) *He taonga te tamaiti. Every child a taonga. Strategic plan for early learning 2019 - 29. Draft for consultation.* pg18

Unplanned provision of services means any provider who meets the regulations can receive public funding regardless of whether they have the capability to meet curriculum expectations or the required governance and management expertise. In 2015, the Ministry and sector 'quality' working group recommended any provider, either an individual or organisation, proposing to open a new ECE should demonstrate governance and management capability and have processes in place to support the professional leader of the service, in order to be licensed.¹¹

If the Ministry is to develop criteria to measure the success or otherwise of services looking to expand, it is not a significant shift to extend that to include criteria against which all services can be assessed.

1.7 Increase monitoring of services - we support the intent of this recommendation.

In addition we recommend:

- monitoring of services be strengthened by requiring the renewal of licenses on a five-yearly cycle.

Unannounced visits and notifying the services' community about changes to licensing status may be effective monitoring mechanisms and would be an improvement on the status quo. However, these measures should go further. The strategic plan is about ensuring every child has the right to high quality ECE and as such we are bound to assure children and their families, communities and the Government that is indeed the case.

ERO and Ministry reports, media articles, research reports and anecdotal evidence has raised concerns about service providers about which little has happened. The quality working group raised a number of concerns about poorly performing services and recommended a tougher stance.¹²

The group recommended the licensing sanctions available to the Ministry should be used more quickly and actively including closer monitoring of services at risk of poor performance and closing an ECE service if it is placed on a provisional licence more than twice in three years, or three times in five years.

It seems there may be a tension at play: the perception that licensing services is primarily about meeting a need for the care of children versus the right of children to access high quality care and education, with the need to have a service taking precedence. This approach places children at risk and is unacceptable. Arrangements can be made with other service providers to support children and families where a service closes, leaving no excuse for a service to remain open when it is clearly failing its community but more importantly, failing the cohort of children enrolled at that time.

ERO reviews focus largely on teaching and learning, and reviewers are reliant on documentation to provide assurance of the quality of the services' governance and management practices. Relicensing at five-yearly intervals or sooner in certain circumstances, would provide a greater level of assurance of quality against Government investment.

¹¹ Ministry of Education (2015) *Early Childhood Education Sector Advisory Group Report - sector-wide quality* p8

¹² Ministry of Education (2015) *Early Childhood Education Sector Advisory Group Report - sector-wide quality* p7

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

2.1 Ensure equity funding supports children who need it - we support this recommendation.

In addition we recommend:

- the review of equity funding and funding for disadvantage be part of a wider review including decile funding
- the *Disability and learning support action plan* be fully inclusive of ECE services and the priorities be evident in the ECE strategic plan
- learning support co-ordinators (LSC) be located in community-based ECE services as well as in schools
- the equity funding isolation component for rural and isolated communities be reviewed to reflect the challenges that services face in providing early childhood education in these communities.

ECE equity funding broadly relates to the school system decile 1 – 4. Both equity and decile funding reach the same or similar demographic and have the same objectives in mind.

The isolation component of the ECE equity funding purports to recognise that isolated service providers face higher costs in accessing goods and services. However, the additional costs incurred are much broader than goods and services and there is no financial consideration given to different organisational models such as umbrella organisations managing network provision. As an example a kindergarten in Franz Josef receives the same amount of funding as a kindergarten located in the heart of Queenstown.

Many children and families need additional support for a range of reasons and across different timeframes throughout their lives. In education settings equity, decile and disadvantage funding and funding for additional learning support provide an extra level of support.

However, the way in which that support is realised is uneven - arguably causing unintended inequity within the system. While circumstances may change over time, it is likely where a child needs additional support when they are nearly five, they are likely to need that support to continue once they start school.

The system needs to be sufficiently adaptable to ensure support is available at the time it is needed and to maintain continuity of support including when the service is open for instruction, rather than the current practice of providing support only when the primary education school year is operational. This will ensure that the focus remains on the child and family rather than on a transition from one sector or institution to another.

It is this part of the strategic plan that links with the *Disability and learning support action plan* which sets out four key priority areas:

- improving the way children and young people are assessed for learning needs
- strengthening the range of supports for children and young people with disabilities and additional learning needs
- improving the way the education system responds to neurodiverse and gifted learners

- ensuring that learning support is resourced for increased support and service delivery.

While we endorse the priority areas, we remain critical of the action plan. ECE services are referenced in the plan however there are few if any tangible actions to ensure the priorities will be evident in ECE settings. The plan is school-centric, primarily focusing on better support for children once they start school. This contradicts the aim of the action plan itself.

The ECE strategic plan needs to be demanding of the action plan to ensure policy, practice and resources are inclusive of children and whānau attending an ECE service. To ignore that is false economy when we know intervening early is likely to result in better outcomes for children and remove or reduce the level or nature of the support needed in later years.

We made a submission to the *Disability and learning support action plan* and in the absence of any further information about the plan or feedback on whether our recommendations have been considered, we resubmit the same recommendations to be included in the ECE strategic plan (Appendix One). Of particular note is our recommendation that the learning support co-ordinator (LSC) role be extended to be inclusive of ECE services. We propose LSC be located in community-based ECE services as well as in schools.

2.2 Co-construct progress tools to support children's learning and well-being - we endorse the intent of this recommendation.

In addition we recommend:

- the plan state that the tools will be designed for our unique context in Aotearoa New Zealand
- the work undertaken by the Ministry's academic research forum provide the foundation for the work on progress tools
- the plan confirms the use of the tools will not be mandatory, rather they will be a guide to support teachers, kaiako and educators' assessment practice
- as part of the policy to implement progress tools, there is a commitment to evaluate the outcomes of the use of the tools.

Assessment of children's learning and progression is central to high quality teaching and learning. As such, teachers, kaiako and educators need to be well supported in their role to ensure approaches to the assessment of learning are appropriate, maintain currency and importantly, focus on children's strengths and interests.

We have the opportunity to design unique and fit-for-purpose tools, embedded within the social and cultural, teaching and learning contexts of Aotearoa New Zealand. There are examples of where we have relied on overseas programmes and initiatives ¹³ to improve teaching practice and outcomes for children. In some cases, these have to be 'retro-fitted' or used as designed because of trade marking or conditions on the purchase and use of the tools. In some cases, there is no evaluation to demonstrate the effect.

¹³ For example: *Incredible Years, Early Reading Together*

The Ministry's academic research group started work on learning outcomes some years ago which could form the basis of the co-design work on the progress tools. We agree that the tools would be available as a guide for teachers, kaiako and educators and want to make sure the use of the tools remains voluntary.

Teachers employ various ways to assess children's learning progression and we want to ensure their professional judgement and expertise can continue to be exercised.

2.3 Expand the number of early learning services that facilitate wrap-around social services to support children and their whānau - we endorse the intent of this recommendation.

In addition we recommend:

- the community-based services be supported to provide wrap-around social services, where those ECE services demonstrate strong connections within their local communities
- the Ministry focus on support to community-based ECE services to establish wrap-around services to support children and whānau.

There are kindergarten associations that currently provide wrap-around services within communities and would like to expand those services. We need to think expansively about the definition of 'social services' and not limit support to certain health or social development services but to support a range of initiatives such as supporting parents and caregivers into employment and/or voluntary work.

Wrap-around services extend the provision of public services to communities, most likely communities that have limited access to resources. Providing a variety of services beyond ECE would require providers to have the connections and capacity to ensure the sustainability of services and have the trust of communities to foster positive and respectful relationships. As a public service, the public would need to be assured funding is used for the purpose it is intended.

The draft plan notes the Ministry will share information about successful integrated approaches. It is likely the local ECE provider will identify the opportunities to expand given they are closer to the community than the Ministry. However, for initiatives to succeed the Ministry must be more proactive and facilitative in its approach, actively removing real or perceived barriers to enable services to expand.

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

3.1 Improve the consistency and levels of teacher salaries and conditions across the early learning sector - we support this recommendation.

In addition we recommend:

- that qualified teachers employed in any ECE setting be covered by a national collective agreement negotiated by the Ministry of Education.

Kindergarten teachers are covered by the *Kindergarten teachers, Head teachers, and Senior teachers' Collective Agreement* (KTCA). The agreement is a fit-for-purpose, national collective employment agreement that sets out the terms and conditions for teachers in kindergartens. It is negotiated by the

Ministry and administered by kindergarten associations. The agreement provides consistency of employment provisions across the kindergarten sector, designed to support teachers in their teaching role and provide fair employment practices. It recognises teachers are part of a wider teaching profession, ensures pay parity with primary teachers, and reflects several of the provisions available to all teachers in the compulsory sector such as professional development time and tutor teacher allowances.

Although there is a long way to go to reach parity of conditions across the profession, the KTCA does provide a model that can be applied across the ECE sector.

The cost of meeting the provisions of the KTCA are met by associations through the per-child-hour-funding rate. The KTCA is a legally binding document and requires associations to allocate around 70% of the Government funding it receives to teacher salaries plus additional funding to meet the terms and conditions of the agreement, guaranteeing the funding is spent on employment conditions. As the parties to the agreement are the Ministry and NZEI Te Riu Roa, associations cannot remove themselves from coverage.

In its 2014 report *Improving quality: employment responsibilities in kindergartens and education and services* ERO found 78% of education and care services lacked effective employment practices, the majority of those being minimally effective or ineffective practice.¹⁴ There is no evidence this situation has changed or improved despite services receiving Government funding and agencies setting expectations to enhance practice such as the Teaching Council's appraisal requirements.

To improve the consistency and level of teacher salaries and conditions across the sector, a new mechanism will need to be put in place to guarantee funding tagged for that purpose is used for that purpose. The sector's track record shows consistent and sustained improvement will not be realised without intervention. While the KTCA and mechanism to negotiate and apply its terms is unique in the ECE sector, the mechanism could be duplicated across the sector either through one or multiple collective agreements. This would provide the Government with:

- assurance that funding for salaries and conditions is used for that purpose
- a better measure of workforce costs
- the ability to effect change in terms and conditions to enhance professional practice
- the opportunity to align terms and conditions across the profession
- set a standard within the sector for all service providers which effectively would be a condition for the receipt of public funding.

3.2 Strengthen Initial Teacher Education (ITE) - we support this recommendation.

3.3 Improve professional learning and development - we support this recommendation.

In addition we recommend:

- the plan state explicitly the expectation that student placements will be undertaken in high quality ECE services

¹⁴ Education Review Office (2014) *Improving quality: employment responsibilities in kindergartens and education and services*. pg9

- teachers providing mentoring services to students are formally trained in adult teaching/mentoring, accredited and paid according to their role and responsibilities
- a comprehensive strategy for professional learning and development (PLD) be designed, implemented and resourced to include leadership development, cultural competence - Te Ao Māori, Tapasa, appropriate support to student teachers, induction and mentoring, deepening and embedding curriculum knowledge and practice, positive transitions, and building capacity around identifying and addressing specific learning needs.

We agree the issues of equity of access to qualifications, variable quality of qualifications, multiple pathways to teaching and teacher diversity need to be addressed. However, we do not support separate or different approaches to ITE for ECE and the compulsory sector. The same principles, standards and expected practices must be consistent across the teaching profession.

We endorse the work currently underway by the Teaching Council to improve quality professional experience placements; develop best practice programme approval, review and monitoring processes; build a pool of supported capable associate and mentor teachers; and strengthening the induction and mentoring of beginning teachers.

We also endorse the Council's focus to encourage greater coherency and collaboration between programmes to make sure overall system needs are met.¹⁵

In particular, we support the proposal that student teachers be placed in high quality ECE services for their practicum experience. It is critical to the overall quality of teaching and learning in ECE that all teachers including students not only experience teaching across a range of ECE and education settings but also that experience is in a service modelling exemplary practice.

Teaching and learning in ECE is not generally well served by the Ministry's PLD programme which often focuses on addressing problematic issues through SELO contracts such as improving poor governance, or 'one off' initiatives such as supporting the introduction of the revised *Te Whāriki* for an 18-month period. Supporting the strategic plan to succeed will require comprehensive PLD opportunities to be available for teachers, kaiako, educators and other adults working with children in ECE services.

The aim of the plan is to lift quality which requires not only new policy settings such as regulating qualifications in teacher-led, centre-based services but also a coherent and sustainable PLD programme. Already there are PLD programmes in place across the profession that could be extended to teachers in ECE such as leadership development or specific aspects of learning support. The Ministry allocation to ECE for PLD is one tenth that of its allocation to the compulsory sector¹⁶ even though around 20 percent of registered teachers teach in an ECE setting, and one in five children attending an education setting attend an ECE service. Much of what applies to teachers in an ECE or school setting is based on a common theory, principle or concept such as leadership or understanding autism – it is in the application of new learning that the difference occurs, and professional practice delineates the two.

¹⁵ Teaching Council of Aotearoa New Zealand (2018) <https://www.educationcouncil.org.nz/content/initial-teacher-education-advisory-group>

¹⁶ Around \$90 million to compulsory sector, around \$9 million to ECE

The Teaching Council's leadership strategy for the profession the growing practice of play-based learning in schools, the aim to better integrate the curricula in the first two years of school, discussions about ITE qualification 0 – 8 years and achievement objectives identified by Kāhui Ako are current examples of areas where a comprehensive and coherent PLD strategy across the education sector would be effective.

A PLD strategy should be co-designed with the profession and resourced centrally, and include leadership development, cultural competence - Te Ao Māori, Tapasa, appropriate support to student teachers, induction and mentoring, deepening and embedding curriculum knowledge and practice, positive transitions, and building capacity around identifying and addressing specific learning needs.

PLD connects our curricula, supporting and building high quality teaching practice across the profession without which teaching practice will continue to vary widely and desired outcomes for children left unmet.

3.4 Develop a workforce supply strategy - we support this recommendation.

In addition we recommend:

- the ECE workforce strategy is part of (not aligned with) the wider education workforce strategy, underpinned by common principles and initiatives to ensure future supply
- the workforce strategy includes initiatives to retain and support qualified teachers currently employed in ECE services, assist staff in regulated positions in ECE services to become qualified teachers, remove funding, regulatory and policy barriers to access ITE, and work with the profession and sector to identify and implement a range of initiatives to secure teacher supply for the future.

The development of a comprehensive workforce supply strategy is critical. We recommended this be broadened to be a workforce strategy which not only includes supply but includes enablers to design and support the future education workforce.

To develop an independent and narrow strategy for ECE will undermine and frustrate the attainment of a number of the goals in the draft plan. An education workforce strategy would necessarily include many of the recommendations in this plan, connecting the goals and giving effect to the range of proposals we submit here particularly on improving ratios [1.2] 100% qualified teaching workforce [1.3], teacher salaries [3.1] ITE and PLD [3.2 – 3.3].

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

4.1 Develop and introduce a process to determine whether a new early learning service is needed - we support this recommendation.

In addition we recommend:

- public, community-based services be prioritised when determining the need for new ECE services.

We have advocated for some time for the Ministry to implement a requirement for the planned provision of ECE services. We see a number of factors would need to be considered in planning provision including establishing mechanisms to engage with local communities about their needs and expectations of services in their area, and with Government and local agencies such as Statistics NZ, Building and Housing, Social Development, and local and regional territorial authorities to predict and assess demand. We also recommend any service proposing to open a new ECE would need to demonstrate governance and management capability and have processes in place to support the professional leader of the service, in order to be licensed.¹⁷ [Ref: 1.6]

A clear focus for Government is building the provision of public education which in the ECE sector relates to community-based services. We see planned provision linked closely to this goal and the opportunity for Government to prioritise its investment in the public sector. ECE services on new school sites need to be established before the schools are built and limited to community providers or the new public agency provider.

4.2 *Provide governance and management support for community-owned service* - we support this recommendation.

We acknowledge the challenges particularly for community-based, stand-alone ECE services. A number of kindergarten associations provide governance and management support to community services either through SELO contracts or as service agreements made directly. ECE services recognise associations' expertise and capacity, and often have a relationship with the association or its local service in their community. Support with employment matters including payroll and managing complaints, compliance, strategy, and PLD are common. There are a growing number of services who, when under financial pressure, approach associations for assistance or to join the association. Where the number of kindergartens has grown in recent years, has been as a result of community-based services coming under the umbrella of an association.¹⁸

4.3 *Support the establishment and maintenance of early learning services on Crown land administered by the Ministry of Education* - we support the intent of this recommendation.

In addition we recommend:

- support to establish and maintain an ECE service on Crown land apply to community-based ECE services
- maintenance of community-based services on Crown land be given priority within the plan
- Crown land operated by local Government is provided rent free to community based ECE services
- third party developers of new builds on Crown land are subject to rental caps when leasing to public providers of ECE.

We support the policy to allocate space on school sites for ECE services. Given the changing nature of school environments, we recommend this not be limited to primary schools but apply to school sites generally.

¹⁷ Ministry of Education (2015) *Early Childhood Education Sector Advisory Group Report - sector-wide quality* p8

¹⁸ Shannon pre-school, other examples ...

Historically, community-based services were supported to establish an ECE service on Crown land. This was on the basis that the Crown sought to support public provision with Government investment. Currently any provider can seek to establish an ECE service on Crown land including with the introduction of new rules in 2013, 'third parties' such as property developers.¹⁹ While the intent of the legislation is to assist an increase in participation, it undermines the ownership and use of public and community property. If the Government is looking to build public provision, it is opportune that it prioritises community-based services on those sites. [Ref: 4.1]

The terms of reference for the draft plan required the Government's objectives for education be taken into account. The objectives included a statement relating to 'quality inclusive public provision' which in the context of ECE means:

'... working to ensure that community-based early childhood education services have well maintained facilities and are able to expand to meet growing demand.'²⁰

There are around 1,000 ECE services on Crown land, mostly on school and kura sites. These are a mix of playcentres, Kōhanga Reo and kindergartens and some (mostly community-based) education and care services. The shortfall in funding over consecutive years has meant these services have struggled to maintain these properties as well as the properties they may own or lease from others. Added to this, new compliance requirements to meet building codes and earthquake standards for example, have compounded the issue. There is an urgent need to develop and implement an approach for community-based ECE services to address maintenance issues not only to ensure the safety and wellbeing of children but also to meet compliance requirements and secure joint equity in Crown-owned properties.

4.4 *Co-design an appropriate funding model with Te Kohanga Reo National Trust* - we support this recommendation.

4.5 *Co-design an appropriate funding model with the Playcentre Federation* - we support this recommendation.

4.6 *Consider setting up state-owned early learning services with an associated research programme* - we acknowledge the intent of this recommendation.

In addition we recommend:

- Government support existing or new community-based ECE services to provide public ECE services in areas where children experience inequality and there are insufficient services to meet local demand.

We commend the concept of services with associated research programmes and the proposal of fully-fund public providers of ECE services to set up new services in communities where affordable, high quality and culturally responsive ECE services may not be available. Rather than setting up 'state owned and operated' services we recommend the Government partner with established public ECE providers that have the demonstrated capacity and capability to establish and support innovative,

¹⁹ Education Amendment Act 2013

²⁰ Hon Chris Hipkins, Minister of Education (2018). Terms of reference: development of a 10 year strategic plan for early learning.

diverse, high quality services. This relationship would require a new type of service agreement, setting out obligations and expectations and to ensure the desired outcomes are achieved.

We see kindergarten ideally placed to partner with Government to provide public ECE services and would welcome a new arrangement for their provision. We are in diverse communities, provide wrap-around services and offer a range of services. Kindergarten is actively engaged in research, partnering with tertiary institutions on a range of projects which have resulted in significant shifts in policy and practice. This work includes transitions undertaken by Mangere Bridge and Waikato University²¹ and the Ruahine association partnering with Massey, Victoria and Waikato universities to explore teacher-child interactions in play by focusing on sustained shared thinking.²² Another example is the partnership between Kidsfirst Kindergartens and the University of Canterbury Child Well-being Research Institute to enhance the well-being of young children around early learning success building strong foundations for literacy learning and supporting whānau.

A comprehensive research programme funded by Government in partnership with the ECE community is a welcome proposal.

Goal 5: The early learning system, continues to innovate, learn and improve

5.1 Establish innovation hubs for early learning services - we support this recommendation.

The concept of innovation hubs where ECE services can access innovation expertise and research partners to enable practitioner-led innovation and research is an exciting prospect. The idea relates to the previous recommendation [4.6] and should consolidate and build on what is already available to the sector such as the Teaching and Learning Research Initiative (TLRI), access to expertise through Kāhui Ako, and the research programme contracted from the NZ Council for Educational Research (NZCER). It should be co-designed with the sector to ensure innovation and collaboration is celebrated, systems and processes facilitate rather than frustrate innovation, and teachers are genuinely supported to push the boundaries around teaching and learning.

Innovation hubs should not stand alone in ECE but be an integral part of wider policy and practice initiatives in education. To limit the concept to ECE creates another silo, detaching ECE research and innovation from the education eco-system and constructing unnecessary boundaries around the age of children.

5.2 Support early learning services to collaborate with other education services - we support this recommendation.

In addition we recommend:

- the Ministry evaluates the experience of ECE services currently engaged in Kāhui Ako
- the Ministry reconstitutes the ECAC Kāhui Ako sub-group to co-design policy and practice to enable genuine and meaningful collaboration across the sector.

²¹ *Crossing the border*. NZCER

²² Teaching and Learning Research Initiative (TLRI) <http://www.tlri.org.nz/about-tlri/news-archive/media-release-research-projects-improve-outcomes-learners-share-14-million>

We welcome collaboration across the sector, understanding the benefits for children, whānau and families, for communities and for the profession. We know 'best teaching occurs when teachers are able to work together, to learn from each other and to share their expertise.'²³ Kindergarten embraced the Communities of Learning/Kāhui Ako initiative, recognising the opportunities and the multiple ways we could contribute our:

- expertise in teaching and learning: 100% qualified teaching teams; play-based, inquiry learning; pedagogical leaders supporting to teaching teams; transitions
- strong relationships with parents and whānau: **engaging parents and whānau in learning** knowing families and being the link between children and their communities; deep knowledge of the local community
- modern, innovative learning environments: understanding and providing flexible spaces for collaboration, teaching and learning
- expertise in stewardship: governing and managing across multiple services; building vision and purpose to realise the dreams and aspirations of communities.²⁴

The most recent report to the Ministry's Early Childhood Advisory Committee (ECAC) on ECE participation in Kāhui Ako, was in December 2017.²⁵ The Ministry advised that 449 ECE services were engaged in Kāhui Ako at that point – 10% of services representing around 20,000 children. Almost a quarter of kindergartens nationally (22%) were engaged in the initiative, more than double the number of education and care services (10.5%). The numbers belie the fact that the experience of ECE services Kāhui Ako vary from meaningful and active engagement as equal partners to ad hoc, reasonably low-level participation. We need to understand and learn from this experience rather than simply continue with the Ministry's current approach.

NZK had a leading role in working with the Ministry to find ways for ECE services to become genuinely engaged and active participants in learning communities. This work provided valuable insights about the way in which ECE services can be encouraged and supported to participate, and ways in which the Ministry could more actively promote the engagement of ECE. As co-chairs of the ECAC Kāhui Ako sub-group, we made a series of recommendations which need to be implemented to successfully realise this goal in the plan. In its final report to ECAC in December 2017, the sub-group recommended the Ministry:

- review Kāhui Ako policy with the purpose of making it inclusive of services, in conjunction with any wider work to redevelop the initiative and to develop a 30-year strategic plan for education
- consult with the education sector as part of the review to ensure changes will bring about authentic collaboration among services and schools
- include models of engagement, such as the threshold model developed by ECAC, in the consultation
- ensure consistent implementation of changes across Ministry regional offices.²⁶

²³ Retrieved <http://www.education.govt.nz/ministry-of-education/specific-initiatives/investing-in-educational-success/faq/>

²⁴ NZ Kindergartens (2016) *Communities of learning. The kindergarten offer*. Wellington

²⁵ Ministry of Education (2017) *Communities of learning. Kāhui Ako. Progress to date*. Sector Enablement and Support. Powerpoint presentation

²⁶ ECAC sub-group (2017) *ECE services me nga kōhanga reo participation in Kāhui Ako. A report by the ECAC sub-group*. 6 December 2017

Since that time, the Minister of Education announced funding was available to ECE services to support their participation in Kāhui Ako. While the funding was welcome, the Ministry's administration of the funding has caused concern, notably that its approach does not reflect or accommodate the different ways services operate. Kindergarten associations for example, have kindergartens participating across multiple Kāhui Ako however they are unable to be the fund-holder for more than one Kāhui Ako. The Ministry needs to find ways to facilitate rather than prevent or frustrate services' engagement and it is entirely within the Ministry's brief to do so.

We recommend the ECAC sub-group be reconstituted to update its work and the groups' recommendations included in the development of policy and practice to support meaningful collaboration.

5.3 *Support robust internal evaluation to ensure ongoing improvement* - we support this recommendation.

ERO reports consistently show the need for services to improve their internal evaluation. We support the idea that the Ministry and ERO would work together to support services to improve, however this needs to be more than 'sharing good practice' which has often been the default position to encourage improvement across aspects of service provision. Evidence and experience across the sector show a more determined intervention is needed such as requiring all service providers to provide PLD as part of their license and receipt of funding.