



He taonga te tamaiti

THE EARLY LEARNING STRATEGIC PLAN 2019-29

Feedback to:

Ministry of Education

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15 MARCH 2019

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About Te Rito Maioha Early Childhood New Zealand

Te Rito Maioha Early Childhood New Zealand is a national organisation that promotes high-quality early childhood education (ECE) through initial teacher education, professional development, leadership programmes, advocacy and membership services.

As a membership organisation, we represent community-based and privately-owned ECE services and teachers. We are also one of New Zealand's top providers of initial teacher education for ECE teachers, and are recognised as a leader in bicultural teacher education. We deliver a suite of qualifications and teacher education and professional development programmes.

General comments

We are pleased to provide comment to the Ministry of Education on *He taonga te tamaiti, the draft Strategic Plan for Early Learning 2019-29*.

We support many of the recommendations in the strategic plan, especially those that address issues the early learning sector has been asking the government to invest in for nearly a decade. The strengths of the plan, and the recommendations we think should be prioritised, include:

- **Improved qualified teacher targets, ratios and group size**
- **Teaching workforce salary and conditions**
- **Teacher Education – initial and ongoing professional learning and development.**

However, there are several recommendations that would benefit from more detail and greater articulation of the problem or opportunity the recommended action would address. We have commented on these in the body of this submission.

We would have liked to see recommendations for improving the infrastructure of early childhood education, with more explicit reference to funding models and resourcing the Ministry to fulfil its licensing and monitoring functions, as part of the drive to raise quality, and the respective roles of the education agencies, including the Teaching Council. The plan is also light on the importance of biculturalism in early learning, and is all but silent on Pasifika provision, which we find disappointing.

It would have been useful to include recommendations that reinforce early childhood education as an essential part of, and inextricably connected to, the wider education system. There seems to be a disconnect between this strategic plan, and the recommendations of the Tomorrow's Schools review, for example.

We recognise that implementation of the strategic plan's recommendations will require significant investment by the government, and by early learning services too. To protect this investment, we recommend the current government seek the agreement of the Opposition to the proposals. The early learning sector does not want a repeat of 2008-17, when the newly elected administration overturned or reinterpreted the policy intent of many aspects of the previous early learning strategy, which had serious financial implications for the sector.

If the New Zealand government, now and in the future, commits to sustained, appropriate investment in our early learning sector, then that investment will bring dividends for the country in the decades to come. The New Zealand longitudinal studies have clearly demonstrated the link between quality early learning and better life outcomes. *Te Whāriki*, the early childhood curriculum, is all about nurturing competent, confident, self-regulating young people who can contribute to society. So, where better for government to make significant investment than in our youngest tamariki and those who educate and care for them?

Comments on the goals and recommendations

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

We support all the recommendations under this goal. We consider some of them are linked inextricably and therefore require equal prioritisation, in particular the “iron triangle” of quality: qualified teachers, ratios, and group size.

Our specific comments on each of them are follow below.

1.1 Regulate new adult:child ratios for infants and toddlers

While we are happy to see an improvement to the ratios for infants and toddlers, we consider that the strategic plan should be more ambitious and adopt what is considered globally to be the best practice standard for under-tuos – namely 1:3, with supported funding.

We see a link to recommendation 1.3, qualified teachers. We consider that the ratio should be not just adults, but qualified teachers. We know anecdotally that in many services, the education and care of our youngest tamariki is often left to unqualified staff. This is a concern, when we know how important the first 1000 days are to a child’s life outcomes. We think the youngest children should have equitable access to qualified teachers.

We support the change to a 1:5 ratio for two-year-olds, but we think this change should be implemented sooner – and not just in the (undefined) longer term.

More information is needed to help services understand how increased adult:child ratios would be implemented across a centre without segregation of children by age, particularly for centres where children’s ages range within a room.

While we understand the changes will have significant workforce and funding implications, we think that with enough lead-in time, New Zealand can implement better ratios for our youngest children in early learning settings. We think it critical that the finalised strategic plan makes explicit the implementation timeframes for these targets, to allow services to plan for staffing changes, and prepare for any associated changes that may be required (eg, changes to licence size and conditions, physical space and building requirements as a result of extra people (eg, toilets), resource consent etc), and the costs that come with them.

The Ministry may also need to prepare itself to meet the changes in a timely way, in terms of re-licensing processes and visits etc.

1.2 Require early learning services to support secure and consistent relationships for children

We agree in principle that this would be a positive initiative, however the draft strategic plan doesn’t provide any information on how this recommendation will be put into practice, measured, supported and enforced. While it is useful to share exemplars, this is not the same as mandating and embedding practice.

Having secure relationships (attachment) is critical to a child’s brain development. Allowing larger services to have roving staff to cover absence etc is not good for children, who need consistent relationships. Qualified teachers know about the importance of relationships and are required by Teaching Council to evidence this for certification, and by the Education Review Office during service provider reviews.

1.3 Incentivise for 100% and regulate for 80% qualified teachers in teacher-led centres, leading to regulation for 100%

We support this recommendation in principle, with some caveats. Government will need to make a significant investment in the training, attraction, recruitment, retention and funding of early childhood teachers in sufficient numbers to meet both the improved ratios and 80-100% qualified teacher targets.

Our members tell us that one of the key barriers to achieving this goal is insufficient funding. They say that the introduction of 20 Hours ECE has devalued the early childhood offering. Some services are philosophically opposed to charging parents for education and care; others are finding that some families (including middle to high-income families) consider ECE a free service, which they are not prepared to pay for. This means that government funding must cover all the costs of centre operations, including realistic wages for hard working teachers.

Government must also be careful that this policy doesn't have unintended consequences for parts of the early learning sector. For example, what will be the impact of this on Pasifika early childhood education teachers and services (language nests)? They already face considerable challenges because of barriers to teacher education programmes as a result of the Teaching Council's stringent English language proficiency requirements.

We feel strongly that provision must be made to ensure student teachers can continue to work in centres so they can put into practice what they learn. We think the strategic plan should be explicit about the need to retain the field-based training option within 80-100% qualified teacher targets. Learning on the job and mentoring is an important part of the teaching profession's ethos and the Teaching Council's Leadership Strategy. We heard at the Ministry's regional hui that the Minister wants to maintain incentives for people to work and study at the same time. We hope that, as a minimum, funding for Year 3 ITE students will continue.

Again, we think that the finalised strategic plan must be clearer (and, arguably, more realistic) about the implementation timeframes for all these targets. Education Counts Time Series data shows that nearly one-third of the early learning teaching workforce is unqualified. Education and care services in particular are sitting at around 64% qualified teachers. The government has a real challenge to raise this to 80% by 2022. Very crudely, using 2018 figures and assuming static numbers (not taking into account changes to ratios etc), it will necessitate 4,246 people qualifying as ECE teachers over a three-year period. This seems unachievable, given the declining number of graduating early childhood teachers per annum. In 2017, 1,365 students completed an ITE qualification in ECE, a significant decrease from the peak number of 2,750 five years earlier (Education Counts, Initial Teacher Education Statistics). We support having a fully qualified workforce by 2023 and not waiting another ten years. Making this happen together is critical.

1.4 Develop advice on group size, the design of physical environments and environmental factors

We support a review of or move to reduce group size to ensure better learning environments. We are concerned that the concept and importance of group size is not well understood. It is less about the size of the physical environment, but rather the optimal number of children in spaces for learning benefits, with alignment to a qualified workforce and appropriate ratios.

We think that the government must ensure that outdoor space is a particular focus of any review of physical environments. Increasingly, the outside space in many, generally newer, ECE centres is very small, artificial and often in areas of industry or on major roadways. We consider ECE settings should

provide for children's health, wellbeing and connection to the natural world, taking into account sustainability for future generations.

We recognise that changes to group size and indoor/outdoor spaces could have significant impacts for many centres, especially those that are built to the minimum regulated standards. It can be very difficult and costly to retrofit to meet regulatory requirements and a likely result could be changes to licence size, which could further decrease the viability of some services. However, if the changes bring about an uplift in quality experiences for children, then the trick will be to implement the changes sensitively for maximum benefit to children but without unnecessarily forcing service closures or reduction in child places.

1.5 Gazette Te Whāriki to support shared expectations

We thoroughly support this recommendation and do not foresee any negative impacts. We see clear links between this recommendation and the need to strengthen the bicultural content of initial teacher education programmes, to build the bicultural competency of the early learning workforce.

We consider this necessitates a stronger curriculum transition from *Te Whāriki* to the *New Zealand Curriculum*, including within initial teacher education qualifications, which in turn will strengthen transitions for both teachers and tamariki.

1.6 Prevent low quality service providers from opening additional services

We support the Ministry implementing an "authorisation to expand" application process, to limit the number of probationary licences underperforming providers can hold. We see this as a real challenge for the Ministry – to have national oversight of providers who can operate under different company names. Robust due diligence processes by Ministry staff will be essential, as will tough penalties for providers who falsify or omit information in their attempt to expand their service provision. Clear operational policy and guidelines around what constitutes low quality will be vital.

1.7 Increased monitoring of services

We strongly support this recommendation. We see the need for increased infrastructure to ensure Education Review Office (ERO) and the Ministry can use their powers (including spot checks) and visit more services, more regularly to ensure ECE delivery is of a consistently high standard and to avoid situations whereby some children experience poor quality teaching for their entire ECE experience – where it is too long in between visits and the quality improvements don't come in time for some kids.

We think it important to state that service providers' compliance with minimum standards does not automatically equate to the delivery of high-quality education for tamariki. It is, therefore, vital that the Ministry and ERO coordinate their review schedules and share information about service provider performance from their respective regulatory and pedagogical perspectives. They should also act more quickly in terms of consequences for poor-performing services.

The Ministry also needs to review and strengthen its processes and regulations around cancelling services' licences. At present it seems to be a complex and protracted process, and poor performing services are given too many chances to improve or appeal decisions. What better way to signal an attitude of non-compromise on quality than to strengthen the Ministry's ability to close low-quality services?

We have a question about how the role of ERO as depicted here fits with proposals under the Tomorrow's Schools review, which discontinues ERO and brings in regional Education Hubs to manage quality at a local level (for schools).

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

We support, with reservations, the recommendations for this goal. Our comments on each of the recommendations follow below.

2.1 Ensure equity funding supports children who need it

Despite the lack of detail provided, we support this recommendation in principle. We provided comment to the Ministry of Education on its proposals for Targeted Funding for Disadvantage in late 2017/early 2018, noting our concerns that the funding would not necessarily benefit the children who most need it. We would welcome a review of the level, allocation and effectiveness of all equity funding, and more stringent reporting requirements on its use by the services who receive it.

2.2 Co-construct progress tools to support children’s learning and wellbeing

There is a lot to unpack within this recommendation, which is light on detail. The Ministry must work closely with the early learning sector before taking this recommendation any further. While we support the overall intent – to ensure the identification of children with learning or development challenges before they start school – we are less convinced by the need for a tool for formative assessment, nor do we fully support the language of “progress”, which inaccurately implies there is a norm (learning and development) for preschool children. That said, we recognise that the sooner learning and development issues are identified and addressed, the more successful tamariki can be.

Assessment frameworks for early learning already exist through *Te Whāriki*’s learning stories. Rather than implement a new tool, we consider it might be better to strengthen teachers’ understanding of how to assess children’s learning and development through initial teacher education and professional learning and development. However, if a tool is implemented, services would need clear guidance and support to ensure they undertake assessments appropriately. Is the expectation that this would be a part of universal assessment undertaken by all ECE teachers, or will it require an extra resource?

We also think it crucial that, if teachers’ assessments identify children whose learning or development is being challenged, ECE services and whānau must be able to readily access appropriate early intervention support. In addition to the current teacher shortage, there is a chronic shortage of learning and development specialists. We are concerned that ECE is still not included in the Learning Support Delivery Model and strongly suggest that this is rectified. It is vital to ensure that ECE teachers are supported to meet the learning needs of the tamariki, and that tamariki and their whānau can access support well before beginning school.

We would strongly support a review of assessment practices in early learning services, with a view to strengthening formative assessment practices. We are aware of research at Massey University into how early childhood teachers in New Zealand are using the learning stories assessment framework. The researcher, Monica Cameron, has interviewed and surveyed teachers across the country to gather data which furthers our understanding about the assessment tools that teachers are using.

2.3 Expand the number of early learning services that facilitate wrap-around social services to support children and their whānau

We support this recommendation but as a lower priority. There are some very effective models that combine wraparound social services with ECE services. For some areas, it might require comprehensive, integrated facilities to be developed (a one-stop shop), which might require larger sites and greater government investment to meet the wider social needs of children and whānau. One suggestion might be to consider using early learning services that are on school sites.

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

We strongly support all the recommendations under this goal. Our specific comments on each of them follow below.

3.1 Improve the consistency and levels of teacher salaries and conditions across the early learning sector

We consider good employment conditions (including reasonable salaries) are vital to our sector's ability to attract, recruit and retain a strong workforce. However, we would like to know how the government proposes to achieve consistent salaries – we hear that “private” education and care centres pay their teachers around \$22-25 per hour, compared to the \$35 per hour kindergarten pays, thanks to the differentiated funding model. We think the strategic plan should specifically recommend achieving pay parity with the schooling sector.

We think most service providers would agree in principle that teacher salaries should be higher, but few will want to raise parent fees to achieve this. Therefore, the difference would ideally come from increased government subsidies.

3.2 Strengthen Initial Teacher Education

We support the overall intent of this recommendation, but we feel it could go deeper.

As an initial teacher education (ITE) provider, we are increasingly concerned that today's students do not have enough general subject matter knowledge. This means that newer ECE teachers are not able to bring this knowledge to the early learning setting. We can observe this in the somewhat ordinary quality and nature of the learning stories being produced by some teachers.

We agree that ECE teachers need a deeper understanding and application of *Te Whāriki* (2017), including intentional teaching and assessment. However, we hear that some teachers are becoming concerned that the emphasis on relationships and sociocultural aspects of early childhood education has swung too far; they think it could be timely to challenge the discourse and talk more about cognition.

In particular, we think ITE providers must improve the bicultural component of their ECE teacher education programmes. In addition to our obligations under *Te Tiriti o Waitangi*, and the teaching profession's *Our Code, Our Standards*, the theories underpinning *Te Whāriki*, the early childhood curriculum, are *Pasifika* and *Kaupapa Māori*. Ideally, the currently differentiated education strategies for Māori, Pasifika and English-medium would be woven together into one.

At the regional hui, the Ministry indicated that strengthening ITE also involves ensuring diversity (gender, culture, ability) in the teaching workforce, but it put responsibility for this squarely on the Teaching Council.

We are not clear how we could operationalise the recommendation that student teachers only undertake practicum placements in high-quality services. Also, how would this work for field-based ITE where students work in centres as part of their training?

We know that field-based training works well, and that services value teachers who have learned on the job. They not only graduate with an ITE qualification, but also come with a significant amount of experience. Services get the value of students sharing current thinking and research with their colleagues in the service. Services will want to continue the benefit of employing a percentage of year

1 to 3 students to ensure the success of field-based training. Therefore, the government will need to ensure once a service is at 100% qualified that there are still funding options for the service to employ students in training.

We also heard at the regional hui that the Minister of Education has asked how the country can maintain incentives for ECE centres to employ teachers in training. We highly recommend the retention of the field-based training option and for the government to continue to fund Year 3 students within the qualified teacher funding.

3.3 Improve professional learning and development

We agree there is an urgent need for improved access to and funding for ECE teachers' ongoing professional learning and development (PLD), across a range of topics. Access to PLD (or lack thereof) can be a marker of the quality of an ECE service. The licensing criteria under the Governance, Management and Administration standard for early learning services require providers to make provision for professional development for their staff (as part of their human resource management practices) – we wonder how many services are really managing to meet this requirement.

Funded release time for early learning teachers to attend PLD will be essential to ensure uptake of PLD opportunities. The government funded release time for teachers to attend Incredible Years programmes – so they should do so again for other PLD.

We suggest that government explore making the completion of PLD compulsory for the purposes of maintaining teacher registration and certification (as happens in Australia), with government funding support. Another mechanism for ensuring our teachers continue to upskill and keep their knowledge current could be through employment agreements.

Potential critical areas for PLD include: upgrading the cultural capability of the existing workforce; supporting services to understand what quality looks like in daily practice; internal evaluation; and leadership.

We caution the government against relying on Kāhui Ako as the primary channel for delivery of professional learning and development to teachers across early childhood education and school sectors as many teachers lose out.

3.4 Develop a workforce supply strategy

This recommendation is really the lynchpin for the whole strategic plan. In order to achieve improved ratios, smaller group sizes, 80-100% qualified teachers, and improved salaries and conditions, the ECE sector desperately needs a comprehensive workforce supply strategy, which the government actively supports and invests in over the longer term. This includes recruitment campaigns, scholarships, and a reduction in barriers to teaching qualifications.

We support having a workforce that mirrors the communities in which children live and participate, which means the ECE teaching workforce should be inclusive of people of all genders, ethnicities and abilities. The government needs to make early childhood teaching an attractive profession to all groups by lifting salaries and improving conditions, and generally demonstrating that it values ECE as an integral part of the education system.

At the regional hui, we were disappointed to hear the Ministry again attribute its lack of real progress on developing a strategy for the early learning workforce to insufficient data. We have been working with the Ministry via the Early Childhood Advisory Committee since 2017 to share the relevant data and information and only recently have achieved action from the Ministry.

It is also very disappointing that the Education Workforce Strategy does not include ECE. We continue to be concerned that the government is not abiding by their RIS 1, “Establishing enduring goals or objectives for education for children and young people aged 0-18.” There is a worrying lack of alignment or, better yet, integration across the education system of ECE with the compulsory sector in reviews, such as Tomorrow’s Schools, Education Workforce Strategy, and Learning Support, to name a few. Having a separate workforce strategy for ECE will undermine some of the quality improvements recommended by this draft strategic plan.

For a well-articulated description of what needs to happen to address ECE teacher supply issues, we strongly recommend that the Ministry revisit the New Zealand Kindergartens 2018 “Making it Happen” brief, which advised the government to set a **maximum five-year timeframe** to achieve workforce-related change, with regard to the following themes:

- Making changes to regulatory and funding settings to ensure improved minimum qualified and certificated teacher numbers, including greater support/reduction of barriers for ongoing professional learning and development
- Taking action to ensure the retention of qualified ECE teachers and leaders, through robust ongoing professional support and parity of pay and conditions with teachers from across the education system
- Actively supporting currently unqualified but employed teachers to gain an ECE qualification (through a variety of suggested mechanisms, with specific roles for ITE providers and the Teaching Council)
- Taking direct action to ensure there are sufficient qualified teachers for the future.

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

We support some of the recommendations under this goal, as follows. Our specific comments on each of them follow below.

4.1 Develop and introduce a process to determine whether a new early learning service is needed

We support the government implementing a more planned approach to issuing licences to new services, and believe this should be tackled as soon as possible.

There is a perception among some of our community-based members that the lack of national oversight of the number of centres opening around the country has created a 'licence to print money' attitude to early childhood education particularly by corporate-owned services, leading to market saturation in some areas with generic services that do little to respond to local needs or where demand for services is not high.

At the regional hui we heard from Ministry of Education officials that the Minister of Education doesn't want overtly competitive behaviours from ECE providers. We consider that closer monitoring and control over the number of services opening is essential and long overdue.

The Ministry of Education should apply a stronger level of scrutiny to all applications for licences and develop a robust tool for establishing future supply and demand. Applications for new services should evidence need in the community, including consultation with iwi.

Transparency and fairness of process will be vital. It will also be important that licensing decisions do not negatively impact whānau choice.

4.2 Provide governance and management support for community-owned services

We strongly support this recommendation. As a membership organisation, with three-quarters of our members from community-based services, we are well aware of the challenges these services can face in assembling strong governance bodies, succession planning, and meeting all their obligations under the relevant New Zealand laws, in particular employment law and human resource management.

Under *Ngā Huarahi Arataki | Pathways to the Future 2002-2012*, an effective model for supporting community-based ECE services with governance and management existed. It was termed 'advice and support', and it included a specific focus on Pasifika services at the regional level. This worked well, and we recommend something similar be reinstated under the 2019-29 strategic plan.

We hope that the support would take the form of access to personalised support and relevant professional learning and development, in addition to tools and resources, at little or no cost to services.

4.3 Support the establishment and maintenance of early learning services on Crown land administered by the Ministry of Education

We are not sure about this recommendation. We consider that the Ministry should have clear contractual arrangements with existing services on Crown land, which set out the parties' respective responsibilities for insurances, building maintenance etc. However, we are not convinced that it is necessary to establish new services on Crown land, especially in areas where there is already a sufficient (or over) supply of services.

Using existing school sites to accommodate early learning services sounds sensible, but we know of cases where schools have experienced rapid roll growth and tried to remove the ECE services to make space for more classrooms. How would the Ministry ensure this could not happen?

However, if adopted, we consider that the use of Crown land should be open only to community-based services.

4.4 Co-design an appropriate funding model with Te Kōhanga Reo National Trust AND

4.5 Co-design an appropriate funding model with the NZ Playcentre Federation

These recommendations don't seem very strategic, and we were under the impression that work is already underway to consider this. It would be better for the strategy to consider a whole-of-system funding model, not just for 10% of the sector. What happened to the funding review of the whole ECE system that was started several years ago?

4.6 Consider setting up state-owned early learning services with an associated research programme (also contributes to Goal 5)

We have concerns about the intent behind this recommendation. This sounds like a pilot, and therefore a precursor to a larger roll-out of state-owned services across the country. We are not clear about why the state would want to enter the early learning market, and the potential tensions if the Ministry of Education becomes a service provider, funder **and** regulator for those services. If the state becomes a service provider, it puts itself in competition with the rest of the sector and may unfairly disadvantage non-state-owned services. Or is the government suggesting a fully integrated state education provision system for children aged from 0-18 years?

We think the need for this recommendation needs to be articulated more convincingly. We are not sure what it seeks to achieve. We are concerned that by putting energy into this recommendation, the government could divert precious resources away from the strategic plan's more important recommendations (namely, raising quality, teacher salaries etc). This should be very low down on the list of priorities.

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

We support all the recommendations under this goal. Our specific comments on each of them follow below.

5.1 Establish innovation hubs for early learning services

It is not clear from the description how these hubs would work and whether they are really needed in the medium term, when the government and sector have so much work to do to raise the overall variable standard of early childhood education and care across the board to meet the proposed new minimum quality requirements.

We also wonder if there is an alternative descriptor for this initiative? “Hubs” are popping up like mushrooms across the Education landscape, and it is getting confusing (eg, Tomorrow’s Schools review (125 schools) and the Kaupapa Māori hubs). Less jargon and more substance are required. What is an innovation expert in the ECE context? Does the hub model work for early learning services that take a Māori worldview?

We think providing support to services to innovate and conduct or participate in research is positive, but we wonder why this function couldn’t be managed through existing initial teacher education providers and social science faculties who are already highly research active, as opposed to creating new entities. That said, there is evidence from Australia and the United Kingdom on the effectiveness of integrated hubs, and pilot programmes undertaken in New Zealand produced some interesting and positive insights.

5.2 Support early learning services to collaborate with other education services

While we think the intent of this recommendation is positive, there is insufficient detail of how this would work in practice; therefore, we cannot say categorically that we support this.

What we can say is that it makes sense for early learning services to work collaboratively (both with other ECE services and across the education sector). Other parts of the sector (such as ITE providers that collaborate around research) provide a strong model for effective collaboration. However, the government must ensure that appropriate levels of support and resourcing are provided to facilitate collaboration in what is currently a competitive market. We assume this is not merely retrofitting an existing approach such as Kāhui Ako, but also open to designing new collaborative opportunities in consultation with the early learning sector. The Ministry will recall the early learning sector’s unhappiness at being an unfunded, afterthought “partner” in Kāhui Ako; indeed, ECE still has challenges in being a truly active partner.

5.3 Support robust internal evaluation to ensure ongoing improvement

Again, there is very little detail to engage with here. In principle, we support the government taking measures to strengthen services’ self-review processes, as we know there is variability in the quality and effectiveness of internal evaluation across the sector. What will the Ministry and ERO put in place to support under-performing services to improve their internal evaluation practices, and to effect measurable improvement?