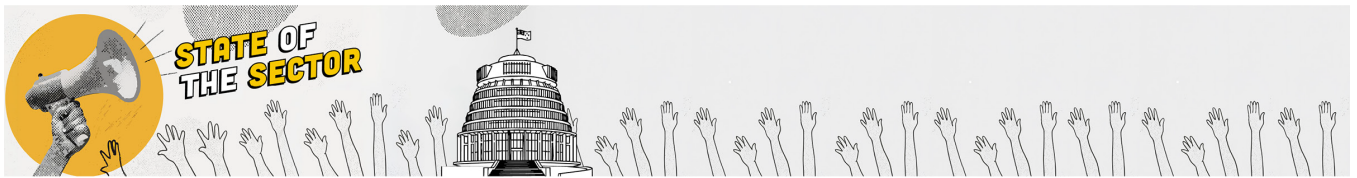


Deep dive into Te Rito Maioha's Five Point Plan.

Te Rito Maioha's Five Point Plan outlines some key changes we advocate for in the early childhood sector:

- 1. *Improve teacher: child ratios* page 2**
- 2. *Develop and implement a Strategic Teacher Workforce Plan* page 4**
- 3. *Fund ECE services sufficiently* page 8**
- 4. *Replace the ECE funding model* page 12**
- 5. *Simplify regulations* page 16**





1. Improve teacher: child ratios

Our ECE ratios are currently among the worst in the OECD. This needs to change to ensure tamariki receive the quality education, care, and attention they need to thrive, learn, and stay safe.

In Aotearoa New Zealand, teacher: child ratios in early childhood education (ECE) are regulated to ensure quality care and education. However, current ratios do not adequately support the best outcomes for children|tamariki or teacher| kaiako well-being.

The current ratios are:

- 1:5 – one teacher per five children under two years old
- 2:20 – two teachers per twenty children over two years old

Outdated ratios that no longer reflect best practice

These ratios were introduced decades ago, without research or evidence, and do not reflect modern understandings of child|tamaiti development or the needs of tamariki in ECE. Established in the 1960s, a time when outdated practices like smoking in cars and corporal punishment were widely accepted, these ratios are outdated and do not contribute to quality education and care of young tamariki.

Advocating for change: a call for a 1:4 ratio for under-three's

In June 2024, we delivered a petition to Parliament, calling for a 1:4 teacher-to-child ratio for all tamariki under three. That means one kaiako to four tamariki under three years of age attending ECE. You can read more about the petition [here](#).

Why lower ratios matter

Individualised care and stronger bonds

A 1:4 ratio allows kaiako to provide individualised care, fostering stronger relationships with each tamaiti. This personalised attention supports social-emotional development and enhances learning outcomes.

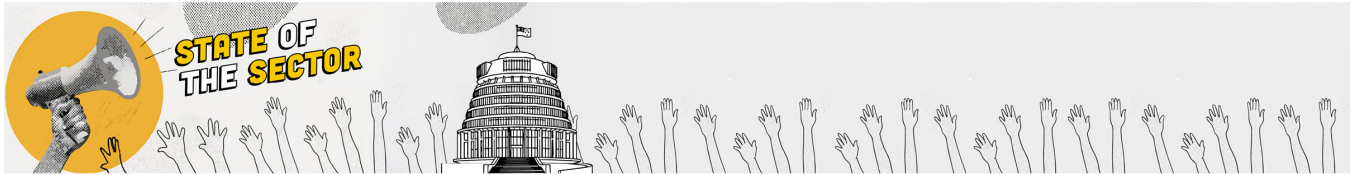
A safer, more nurturing environment

High teacher: child ratios can create stressful, overwhelming environments for both tamariki and kaiako. When kaiako are responsible for too many young tamariki at once, basic needs like feeding, nappy changing, and rest can become rushed or compromised. Lower ratios allow for calm, responsive caregiving, reducing toxic stress for tamariki.

Better educational outcomes

With lower ratios, kaiako can observe, understand, and support the unique development of each tamaiti more effectively. A lower ratio allows tamariki to develop more secure attachments with their kaiako, leading to targeted learning experiences with better cognitive, social, and emotional outcomes.





Supporting teacher well-being and retention

High ratios contribute to burnout and stress, making it harder to retain and attract and retain skilled kaiako. Juggling multiple responsibilities under intense pressure leads many kaiako to leave the profession. By reducing ratios, we can create sustainable working conditions that support both kaiako well-being and the future of the ECE sector.

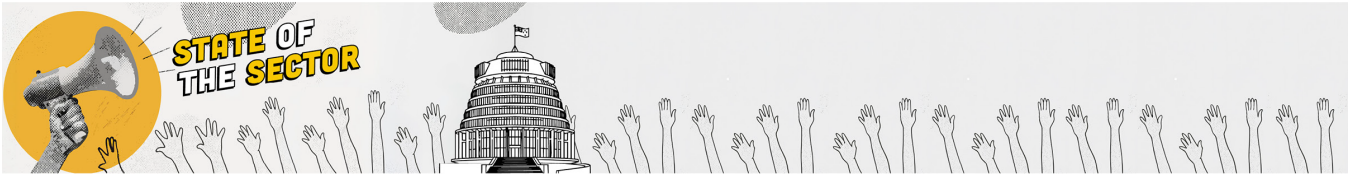
ECE funding is tied to these ratios

The current ratios and funding model create an arbitrary cut-off at age two, which leaves two- three year-olds particularly vulnerable. In reality, these tamariki have similar needs to younger infants - with some requiring nappy changes, support with developing language, and social-emotional guidance - and they miss out on comparable support due to unsuitable funding structures and ratios.

Continuing to advocate for quality ECE with tamariki and kaiako at the centre

It is widely accepted that the quality of an ECE environment increases with lower teacher: child ratios. We remain committed to advocating for low teacher: child ratios, recognising them as a core pillar of quality ECE. Along with group size and kaiako qualifications, ratios form part of the 'iron triangle' of quality ECE.





2. Develop and implement a Strategic Teacher Workforce Plan

We need a Strategic Teacher Workforce Plan to attract, retain, and grow a professional, culturally responsive ECE teaching workforce within Aotearoa New Zealand, while prioritising ongoing investment in initial teacher education across all education sectors.

Aotearoa is experiencing significant teacher shortages that spans all sectors – early childhood education (ECE), primary, and secondary. We urgently need a Strategic Teacher Workforce Plan to ensure a sustainable pipeline of qualified kaiako to deliver quality ECE and school education now and into the future to ensure we never experience levels of shortages as we are currently.

The case for a workforce strategy

“The right of every child to a quality public education is dependent on a high-quality teaching workforce. The Education Sector Groups agreed there is a chronic and critical shortage of teachers across the early childhood, primary and secondary sectors and there is an immediate need to find a systemic solution to prevent further attrition.”

Joint statement following Teacher Supply Summit 2024.

Some ECE kaiako face lower pay, challenging working conditions, limited career pathways, and poor professional status. Teaching is an essential and an increasingly complex role, yet kaiako remain undervalued. The shortage of qualified ECE kaiako in Aotearoa is complex and long-standing problem that requires a range of coordinated, multifaceted solutions. It isn't as simple as enrolling more taura into ITE or easing immigration settings for overseas teachers. We must take a systemic, strategic approach to enact real change, address the root causes, and build a strong and sustainable teaching profession that deserves the recognition of a profession. These are our people educating our youngest tamariki and young people who will be in future workforces driving the economy.

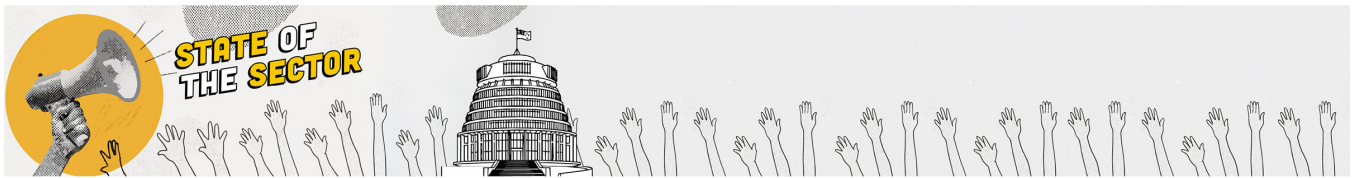
Here we highlight the challenges in the ECE sector which is only one part of the teaching workforce.

Factors contributing to our ECE kaiako shortage

Pay and Conditions: ECE kaiako are not paid equitably compared to their colleagues in the school sectors- a teacher is a teacher no matter what part of the education sector they work in. Inadequate pay, insufficient non-contact time, and high workloads are pushing kaiako out of the profession.

Professional status: ECE teaching is often perceived as low-status work. Without public recognition and respect for the profession, we will struggle to attract and recruit new kaiako. Teacher qualification





requirements exist to meet quality education goals for tamariki which is associated with knowledge of child development and the curriculum.

Career pathways: Many kaiako see limited opportunities for development, progression, or leadership in their careers.

Workforce supply: Aotearoa is not training enough ECE kaiako to meet current and future demand. *Registered Early Childhood Teachers* remain on Immigration New Zealand's Green List. While these teachers enrich and diversify our teaching workforce, it is a reactive one-sided response to a long-standing problem. We must be proactive, growing and nurturing our own workforce for a sustainable ECE kaiako pipeline.

Teacher retention: Burnout, disillusionment, and lack of support are major drivers of attrition. These are often linked to pay and conditions.

Key components of a Strategic Teacher Workforce Plan

A Strategic Workforce Plan needs to be action orientated, setting clear targets, responsibilities and timelines. The following principles are not exhaustive, but must be considered:

Value kaiako

The Teaching Council's *2023 Snapshot* identified the top three concerns of kaiako as: stress and workload; financial compensation; and resourcing and support. This boils down to how we value kaiako.

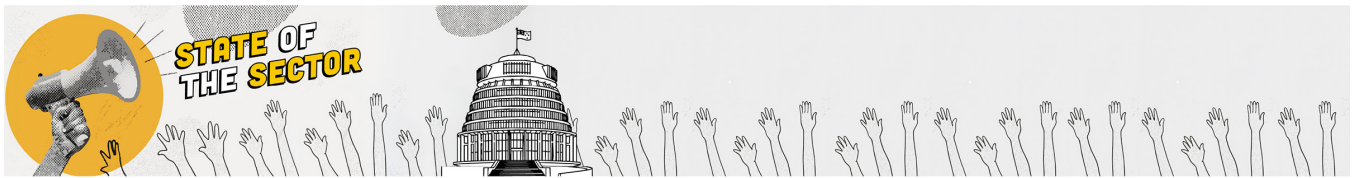
- Raise the status and mana of the teaching profession. Publicly recognise the value of kaiako to make it an attractive career option and to retain existing kaiako.
- Remuneration must reflect the actual workload and nature of the profession. ECE kaiako have never been valued, remunerated, or asked what is needed to ensure a fairer system and to achieve pay parity.
- Despite meeting the same qualification, registration and certification standards, ECE kaiako are behind their compulsory schooling counterparts in pay, conditions, and perceived status. A teacher is a teacher is a teacher, no matter what sector they teach in.

Improve kaiako retention and career pathways

Retention remains a major challenge for the sector due to high workloads, inadequate pay, and limited opportunities for career progression. A strategic approach to retention should include:

- Fair and competitive remuneration to achieve pay parity across ECE and school. At a minimum, ECE pay should be comparable with primary teachers.
- Address resourcing issues to improve working conditions, including manageable teacher: child ratios and sufficient non-contact time.





- Continue to strengthen mentoring and induction programmes to support kaiako entering the profession.
- Creating clear career pathways, including leadership development opportunities, professional development opportunities, and succession planning.

Strengthen and support initial teacher education (ITE)

- Government must continue to prioritise investment in ECE and school ITE to grow a strong domestic workforce. This is essential to ensuring the future stability and quality of the teaching profession.
- Consider paid practicum for taura in ITE to support equitable access and retention of diverse taura.

Utilise data to inform strategy and solutions

- Collect and utilise data to forecast workforce needs, and to inform policy initiatives and tertiary investment in ITE.
- Establish a centralised system for ECE workforce data and forecasting. The Ministry of Education track primary and secondary teacher demand and supply through the *Teacher Demand & Supply Planning Projection*. There is currently no such data or analysis available for ECE, other than some data through teacher registration and some ECE services reporting.

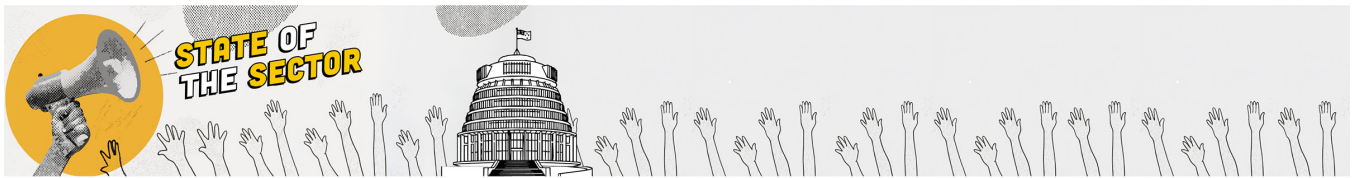
Co-design and collaboration

- The sector has the incentive, commitment, and expertise to drive change. They understand the challenges and know needs to change. Involving the relevant government agencies, unions, ITE providers, sector leaders, and ECE kaiako will help develop and implement a Plan that is credible and impactful.
- Kaiako shortages extend beyond ECE, so it makes sense to align workforce planning with the primary, and secondary sectors to create a seamless education pipeline.

Sustainable funding commitment

- View education – both ECE and ITE - as an investment rather than an expense.
- Avoid short-term political initiatives that prioritise short-term cost-savings at the expense of workforce quality, development, or sustainability.
- Incentivise workforce retention in under-served communities, particularly rural or low socio-economic areas.





Long-term solutions require bipartisan agreement

ECE continues to suffer from inconsistent policies, quick-fixes, and inadequate investment. Frequent policy shifts driven by changing governments have created instability in the sector and have undermined efforts to build a strong, well-supported and sustainable workforce.

Decision-makers must take a long-term view of the education sector and not use as a political “football”. We have seen the unintended consequences of successive governments making piecemeal and ill-informed decisions without engagement or consultation. For instance, no investment into ECE at all, to the removal of Pay Parity for ECE relief teachers, all of which undermine the quality, mana and professional status of teachers and will drive down pay and conditions. We all want a coherent, high-functioning, sustainable ECE sector that focuses on teaching our tamariki so they can be successful. Without a strategic approach, policy changes made in isolation risk undermining progress in our tamariki’s education every day.

Sustainable and impactful solutions need bipartisan commitment, supported by sustained investment in ITE. A bipartisan workforce strategy would:

- signal a commitment to quality ECE and ITE.
- provide stability and confidence for the teaching profession.
- reduce volatility and enable sustained investment.
- improve workforce planning, reducing the cycle of shortages and surpluses.

By working together across party lines, we can develop a cohesive workforce strategy that serves the best interests of tamariki, whānau, and educators rather than being subject to political whims.

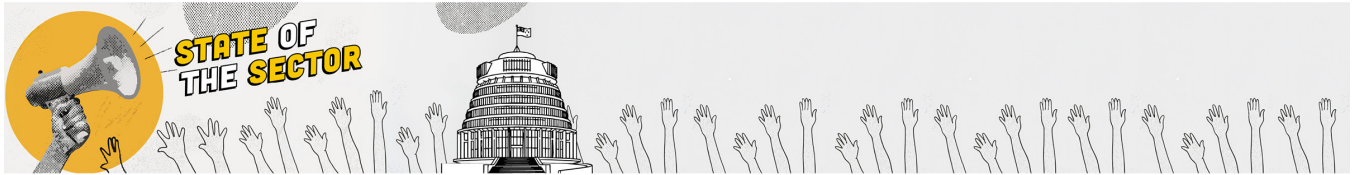
What role does Te Rito Maioha play?

For our ECE membership, we advocate for a national, strategic approach to workforce planning in ECE. Our tamariki deserve high-quality ECE delivered by a valued and qualified teaching workforce. We are committed to working with government, sector leaders, our members on a Strategic Teacher Workforce Plan that keeps our tamariki and kaiako at the centre – why and what for.

ECE is a complex sector, with many challenges and opportunities. Many of the factors that have contributed to the ECE kaiako shortage are covered in Te Rito Maioha’s Five-Point Plan. Our ongoing advocacy, teacher education mahi and future updates will continue to focus on these priorities.

As an ITE provider, Te Rito Maioha’s ECE and primary provision contributes to a medium and long-term solution of improving and sustaining kaiako supply.





3. Fund ECE services sufficiently

Provide sufficient funding for ECE services to deliver quality education for tamariki and ensure kaiako are paid what they are worth as a profession, without placing the burden of high fees on parents.

It is well documented that early childhood education (ECE) sets children|tamariki up for success, in terms of their own social, emotional, and cognitive development, their lifelong learning journey, and the wellbeing of their family|whānau. Despite this, the ECE sector has long been underfunded, and ECE teachers|kaiako remain undervalued.

It is critical that our ECE sector is sufficiently funded for our tamariki to benefit from quality education, ECE kaiako to be paid fairly, and whānau to access affordable options.

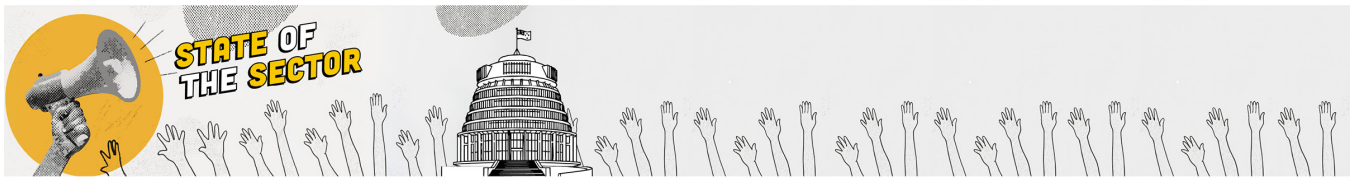
A shift in mindset is required, to stop thinking about ECE as a cost, but as an investment. Investing in our tamariki is investing in Aotearoa New Zealand's future. We need a commitment to sustained investment in ECE to achieve the ultimate goal of a viable and effective ECE sector that delivers positive educational and social outcomes for our future generations.

Why fund ECE?

A sufficiently funded ECE sector would:

- enable **services to be viable**, as funding reflects the real cost of delivery.
- mean **services can invest** in their learning environments, resources, and professional development for kaiako.
- adequately resource services, with **low teacher: child ratios** and **learning support**.
- mean **qualified kaiako are fairly remunerated at parity with primary**, recognising the real work they undertake and valuing the profession.
- go a long way to addressing the **current workforce shortages**, as better pay and conditions will help attract new kaiako into ECE and retain existing kaiako.
- ensure **whānau are not burdened** by high fees.
- allow **whānau choices about the type of ECE** service their child|tamaiti attends, considering their own needs, values, and priorities.
- demonstrate a **commitment to ECE and recognise its value**.





These factors contribute to a stable ECE sector, affordable choices for whānau, improved working conditions for kaiako, and ultimately, a quality ECE experience for tamariki. All aspects of the ECE sector are uplifted. Unfortunately, this is not our current reality, where after years of significant underfunding from successive governments, ECE funding has not kept up with inflation, or the increasing costs of running a service.

What is the cost of underfunding ECE?

ECE services are struggling to operate

The current ECE operating environment is financially unsustainable. Since 2019, there has been a 5% decrease in the number of licensed ECE services, dropping from 4,652 to 4,409 in 2024¹. This is an alarming trend.

Underfunding puts significant pressure on the sector, as it does not meet the actual cost of delivery. Rising costs - including rent, compliance, and resources - have not been matched by funding increases, forcing many services to either close, reduce offerings, or pass additional costs onto whānau. This limits a services' ability to deliver safe, high-quality education and care without increasing the parent fees. Funding should enable a diverse range of services to operate and be financially viable.

ECE kaiako are underpaid and undervalued

Underfunding ECE means kaiako are not fairly paid for the work they do. ECE kaiako are required to be qualified, registered, and certificated to undertake complex, and incredibly important work. Yet, despite these professional requirements, they are consistently undervalued and inadequately remunerated. These are two significant factors contributing to workforce stress and shortages. COVID-19 further exacerbated staffing shortages, with kaiako facing growing financial strain, wellbeing issues, and burnout, leading many to leave the profession altogether.

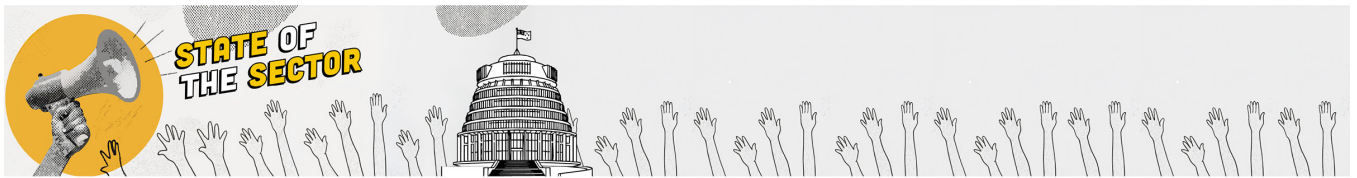
Aotearoa has teaching workforce shortages across all education sectors, but the pay and conditions of ECE kaiako set it behind primary and secondary teaching in both public perception and in real dollars. Unlike their compulsory sector counterparts, ECE kaiako are not paid by the Ministry of Education, they are employed and paid by individual ECE services. Pay parity would help with attracting new kaiako to the profession, improving retention of qualified kaiako, and supporting a stable and better quality ECE sector for tamariki.

We are committed to qualified and certificated ECE teachers to achieve pay parity with the primary sector. However, in practice, pay parity has been poorly implemented and under-funded. It is an opt-in scheme, and has not been fully funded, leaving services to make up the shortfall meaning parents are impacted by higher fees, and ECE relief teachers are no longer eligible. This undermines the quality, mana and professional status of teachers, and will drive down pay and conditions and the quality of early learning. Full government funding is essential to achieve full pay parity for ECE kaiako with primary kaiako

¹ Ministry of Education's annual ECE census, taken June 2024.

https://www.educationcounts.govt.nz/_data/assets/pdf_file/0009/249624/ECE-Census-2024-Licensed-Services-Factsheet.pdf





Qualified kaiako are central to quality ECE - along with group size and ratios, kaiako qualifications form part of the 'iron triangle' of quality ECE. We must invest in and value this highly professional workforce. You can read more about the importance of qualified teachers [here](#)

Whānau are paying the price. Tamariki are paying the price...

ECE in Aotearoa is amongst the most expensive in the developed world for whānau. Various initiatives by various governments have helped affordability for some age groups, or for some families, but none have gone far enough to keep fees down.

Facing increased costs, many ECE services pass these on to whānau. This reduces affordability and access, creating a barrier and limiting their options. We advocate for parents to have a genuine choice in the type of ECE service their tamariki attend. This choice should include kindergartens, education and care with both community and private services, Montessori, Steiner, Barnardos, kōhanga reo, home-based services, playcentres, and Pacific language nests. Being able to choose what is the right environment for tamariki, enriches the sector and reflects the varied needs and values of whānau.

The consequences of underfunding are clear: underfunding is driving inequality, disrupting access to quality ECE, and results in lost potential for tamariki and their whānau. The environment is also unstable and unsustainable for ECE kaiako and services.

ECE is an investment

Aotearoa's newly established Social Investment Agency intends to better use data, evidence, and analytics to identify effective early interventions, and to partner with social service providers to improve long-term outcomes - ultimately reducing future costs to taxpayers.

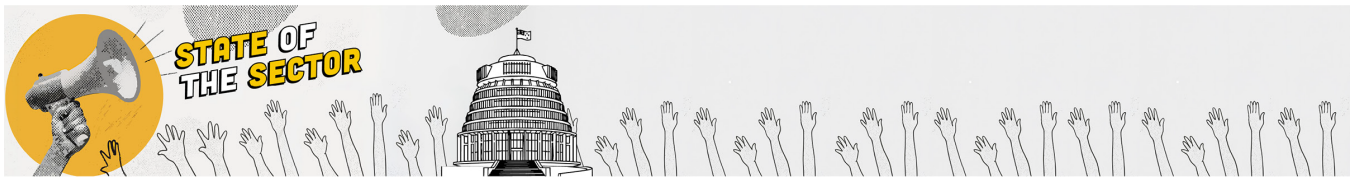
We believe ECE aligns strongly with this model. Investing early in a child's education supports equity and has long-term health, education, and employment benefits for tamariki and their whānau (ECE enables parents to enter the workforce, breaking cycles of poverty and growing the economy, decreasing reliance on social services, and less engagement with justice agencies). Economic analyses show that ECE delivers a high return on investment, with the long-term benefits of public funding far outweighing the initial costs. The return on investment is social, economic, and intergenerational. When viewed through this lens, ECE is not a 'nice to have', it is a smart and future-focused investment in Aotearoa's wellbeing and prosperity.

Quality ECE is the crucial first step to setting tamariki up for academic success. Investing in ECE needs to be an essential component of the government's ongoing investment, not just in education, but in our wider social wellbeing.

We need action and investment

We need bold action and sustained investment to build the ECE system that tamariki, whānau, and Aotearoa deserve. A well-funded ECE sector - where kaiako are paid fairly, where quality is consistently high, and parents have affordable choices - is essential for delivering equitable outcomes across all communities.



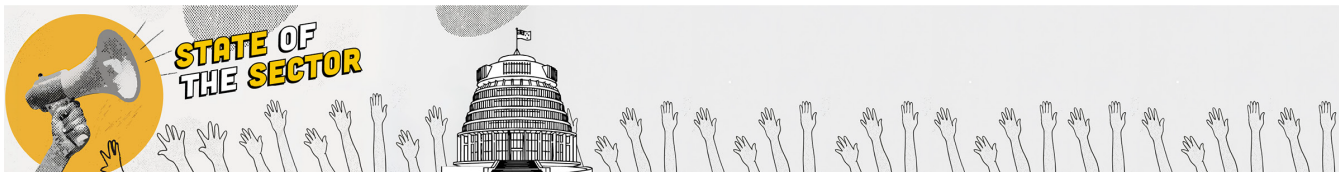


Sufficient, sustained funding is critical to ensuring all tamariki can access quality ECE, no matter where they live or their family circumstances. It also means investment that supports sector sustainability and recognises the professionalism and value of the ECE teaching workforce.

The sector urgently needs significant investment to get back on track. This isn't about short-term fixes - it's about building a stronger, fairer future. We urge the Government to act now: to properly fund the sector, to commit to long-term solutions, and to work across party lines to deliver lasting change.

Funding alone, however, is not enough. Investment must be informed by, and support a *Strategic Teacher Workforce Plan*, and the regulatory review to create the strong, sustainable foundation our ECE system needs.





4. Replace the ECE funding model

The current ECE funding model is outdated and not fit for purpose. The sector urgently needs an investment strategy and funding model that better supports today's working whānau, tamariki and ECE services to deliver quality education.

Early childhood education (ECE) services in Aotearoa New Zealand are currently funded through bulk funding. However, the funding model is overly complex, outdated, and poorly aligned with the sector's goals and needs. Change is urgently needed, but any contemporary funding model must enable high-quality, accessible, and sustainable ECE.

If we want a viable and effective ECE sector that delivers strong educational and social outcomes for all children|tamariki, we need sustained and sufficient investment. Funding ECE is not merely a cost, it is a strategic investment in national wellbeing and long-term productivity.

The case for change

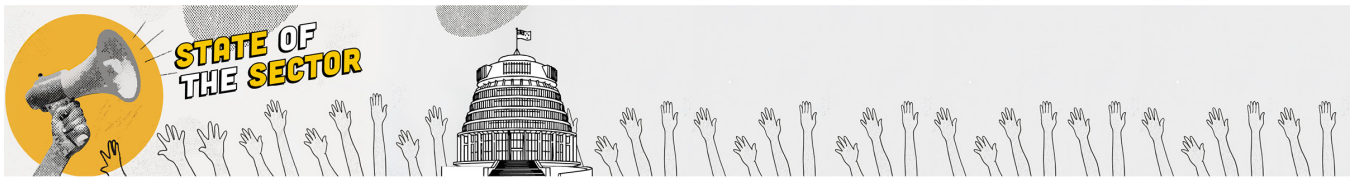
The government currently funds the ECE sector through a complex and outdated funding model. This was introduced decades ago, and it is no longer fit for purpose. Over time, iterative adjustments made in response to changing sector needs and initiatives have resulted in a funding system that is unnecessarily complex and confusing. The ECE landscape - as well as education policies and priorities - has evolved significantly, and the funding model does not effectively support the sector.

The funding model is a barrier to achieving the full educational, social and economic benefits of ECE. It puts pressure on services, teachers|kaiako, and whānau, for instance:

- Navigating the complex model and layers of rules creates an administrative burden for the ECE services the funding is intended to support. This takes ECE staff's time and attention away from the tamariki in their care.
- Funding does not reflect the true cost of quality ECE provision. While costs continue to increase, funding has not kept up. This undermines pay parity and the sustainability of the ECE kaiako workforce. As a result, we are seeing ECE services close, whānau fees becoming increasingly unaffordable, and the underpaid and undervalued ECE workforce experiencing burnout.
- ECE services don't have funding certainty to plan ahead, and many quality services are struggling to remain viable and cost effective for whānau. The number of licensed ECE services has declined by 5% since 2019². Funding pressures are contributing to this. This destabilises the sector and reduces the diversity of service types and limits choice for whānau.
- The funding model stifles diversity in the network of ECE services. A diverse ECE sector allows whānau to make choices, from kindergartens, education and care - both community and private services, Montessori, Steiner, Barnardos, kōhanga reo, home-based services, playcentres, and Pacific language nests.

² Licensed early childhood services decreased from 4,652 in 2019 to 4,409 in 2024: ECE Census results June 2024.





What do we need?

The current funding model is outdated and has been subject to piecemeal changes that have made it unwieldy. To truly drive change, the sector deserves a clean slate. This starts with a funding review, with the intention of using the learnings to develop an investment strategy and funding model to support a sustainable, quality ECE sector in Aotearoa.

A first principles funding review

Government agreed to commission an ECE funding review in 2024, recognising that significant change is needed. A first principles funding review will need to seek to understand:

- the current funding model, its strengths and weaknesses, expenditure, and value for money.
- the policy and legislative framework influencing and regulating the ECE sector.
- tamariki and whānau needs.
- challenges facing ECE services and kaiako.

The sector knows what works and what doesn't, so the review must involve meaningful engagement, including modelling options and testing before implementation would work in practice.

An investment strategy

Effective investment requires a clear strategy. We need a long-term strategy that supports a viable, thriving, innovative ECE sector. The lack of a strategic approach is what contributed to the current state of our ECE funding model. Iterative changes made, without a cohesive plan, risks the ineffective use of government funding.

This requires a shift in thinking, to reframe ECE as an investment, not a cost. Investment in ECE benefits not only each child|tamaiti, but also their whānau, communities, and the wider economy. The benefits are not just educational, there are also positive health, and social outcomes to be gained from quality ECE.

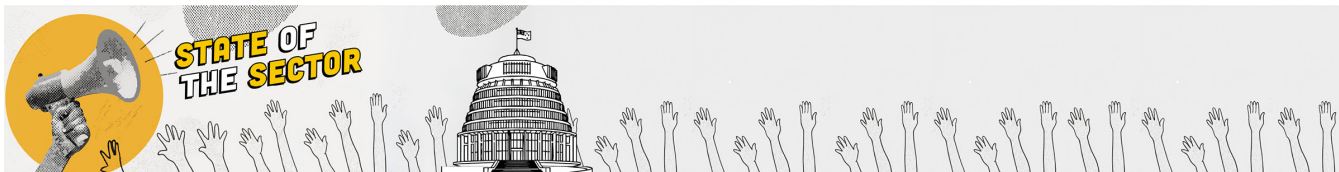
This perspective aligns closely with the Social Investment Agency's approach - effective investments that improve long-term outcomes for New Zealanders. ECE is one of the most effective early interventions available. From an economic perspective, it provides an excellent return on investment. ECE is a powerful lever for improving social equity, lifting educational achievement, promoting equality, and enhancing long-term economic wellbeing in Aotearoa. To realise those benefits, the sector needs strategic and sustained investment.

A fit-for purpose investment model

An updated investment model is essential to underpin sustainable, affordable, high-quality ECE provision. This must:

- deliver on the ECE investment strategy.
- support the teaching workforce.
- keep tamariki at the centre and meet whānau needs.





- support Te Whāriki e Whāriki: He whāriki mātauranga mō ngā mokopuna o Aotearoa Early childhood curriculum.
- address ratios and group sizes
- have the flexibility to adapt and grow with changing needs.
- promote a diverse ECE network.
- be transparent and simple to navigate.
- support continual improvement and workforce development.
- provide long-term certainty for ECE services.
- Align policy, legislation, and investment in ECE to support quality delivery.

A call for action

Only government has the levers and ability to drive systematic change. While there appears to be a commitment to undertake an ECE funding review, this has not commenced. A comprehensive funding review requires Cabinet approval – and more importantly, a commitment to sufficient, sustained investment. To ensure this used effectively requires an ECE investment strategy.

Reframing ECE as an investment fundamentally changes how it is funded. It requires long-term vision, planning, and bipartisan commitment. We recommend co-designing an investment strategy with the sector, underpinned by a robust and future-focused investment model.

To achieve a sustainable, quality ECE sector, we must take a holistic approach. An investment strategy cannot progress in isolation. It must be coordinated with and informed by the ECE Regulatory Review, the Learning Support Review, and the development of a Strategic Teaching Workforce Plan (necessary to address ongoing kaiako shortages across all sectors including pay parity), policy and legislation. These initiatives are interconnected and essential to delivering meaningful and lasting change.

We want to set the foundations for a sustainable and quality ECE sector for generations to come. Smart, future-focused public investment will support the wellbeing of our tamariki and the prosperity of our communities.

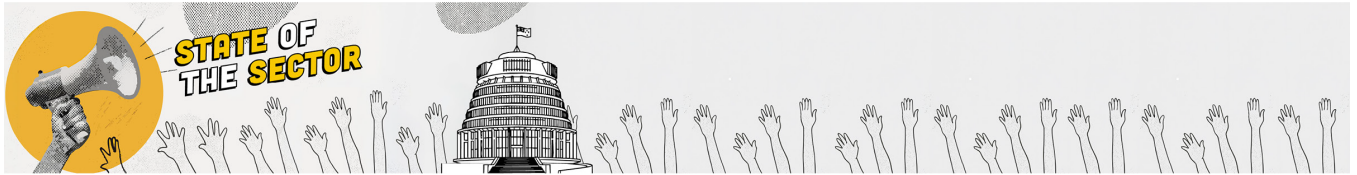
What role does Te Rito Maioha play?

In our view, a funding review is the logical first step. While the Government agreed to commission an ECE funding review in June 2024, the scope and terms of this must be approved by Cabinet, and so far, there has been no action.

We have worked with our fellow leaders in the ECE Sector Partnership to draft a suggested Terms of Reference for the review and provided this to the Associate Minister of Education (Early Childhood Education). The Terms of Reference recommends:

- undertaking a first principles funding review to assess the current ECE funding model and sector landscape.
- developing a long-term ECE investment strategy aligned with a social investment approach.
- identifying and assessing investment model options that support a sustainable, quality ECE sector.

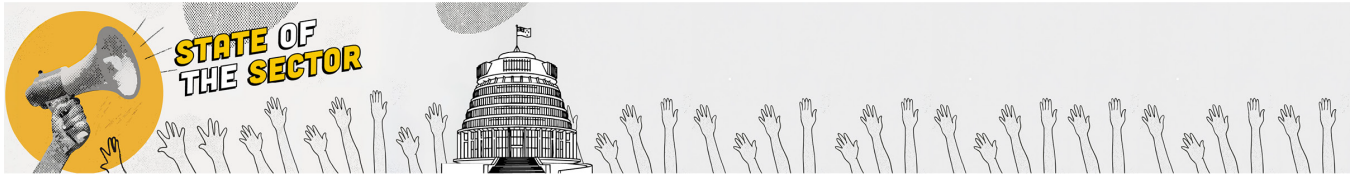




- engaging meaningfully with stakeholders to ensure broad input and build support for change and enable successful implementation.

We support a funding review and have offered to pilot any proposed changes to ensure they are fit for purpose. We welcome any thoughts you may have, please send these to members@ecnz.ac.nz.





5. Simplify regulations

Regulations should ensure tamariki safety and quality ECE delivery without burdening ECE services or kaiako with repetitive, labour-intensive paperwork from multiple government agencies that keep them from tamariki education and wellbeing.

Early childhood education (ECE) in Aotearoa New Zealand plays a foundational role in children's tamariki lifelong learning and wellbeing. ECE services are trusted with the education and care of tamariki, so parents, whānau, communities, and government agencies must have confidence in the capability and quality of ECE services.

ECE regulation must balance tamariki safety and quality education, a viable network of providers, and accountability for government funding.

We welcomed the Ministry for Regulation's ECE regulatory review and supported some of the initial findings — that current settings, tools, and practices create an excessive compliance burden. However, there are areas of significant concern. With the review now complete, there is an opportunity to reset the regulatory framework to better support quality learning, reduce unnecessary administration, and hold tamariki needs above all else.

How did we get here?

The sector went through significant change in 2008, when the current ECE regulations³ were legally defined. The scale of change meant ECE services needed to be re-licensed. Since then, the sector has grown and evolved considerably, leading to iterative changes to the licensing criteria⁴ in response to emerging issues, educational policy, or political whim. The result is a complex and fragmented regulatory framework.

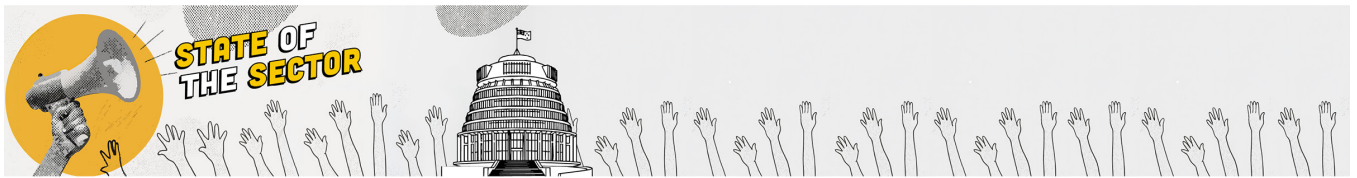
The sector is currently regulated through:

- The **Education and Training Act 2020**, which aims to deliver high-quality, culturally responsive, seamless and inclusive education.
- The **Education (Early Childhood Services) Regulations 2008** specifies licensing and operational requirements.
- **Licensing Criteria**, prescribed by the Minister of Education, outlining the day-to-day standards ECE services must meet.
- The **Funding Handbook**, prescribed by the Minister of Education, outlining the requirements ECE services must meet in order to receive government funding.

³ The *Education (Early Childhood Services) Regulations 2008*.

⁴ Note the licencing criteria can be changed by the Minister of Education, whereas legislative change requires Cabinet approval.





Multiple agencies are involved, primarily the Ministry of Education and the Education Review Office (ERO), each with different roles and interests.

The cost of compliance

ECE services report an increasing administrative burden and complicated, overlapping regulations. ECE service leaders and teachers|kaiako spend significant time on paperwork and compliance activities—time better spent engaging with tamariki.

While safety and accountability are critical, it seems the balance has tipped too far. Regulations must enable, not hinder, the delivery of quality ECE. Simplifying requirements, removing duplication, and using smarter reporting tools could significantly reduce the burden without compromising quality.

Inconsistent interpretation and application

One of the sector’s biggest frustrations is inconsistent interpretation and application of regulations across agencies. Our members report differences between Ministry of Education regional offices, or between the Ministry and ERO. This creates confusion, inefficiencies, and inequities.

Conflicting advice and limited support make compliance harder and undermine trust in the system. Regulations risk becoming a tick-box exercise rather than a tool for quality improvement.

The Ministry for Regulation’s review found regulatory agencies have not provided strong or consistent leadership and recommends strengthening this⁵. We agree and hope the recommendations lead to better stewardship, communication and guidelines to aid sector understanding.

Strategy before reform

A strategic regulatory framework—co-designed with the sector—must underpin any reform. It should clarify the purpose of regulation, define shared principles, and ensure changes are coherent and enduring. A strategic regulatory framework should complement an *ECE Investment Strategy* (a key component of overhauling the ECE funding model) and *Strategic Teacher Workforce Plan* (necessary to address ongoing kaiako shortages across all sectors) to ensure coherence across the system. Effective reform must start with a clear purpose and direction.

The Ministry for Regulation also identified the lack of strategic or long-term planning and recommends clearly defining regulatory objectives and adopting a more strategic, long-term approach⁶.

⁵ **Recommendation 2:** Clearly outline the roles and responsibilities of all regulatory agencies involved, ensuring efficient collaboration, accountability, and update legislation if required.

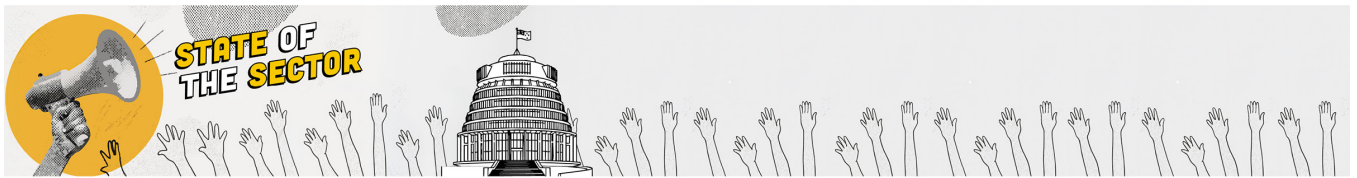
Recommendation 5: Strengthen regulatory oversight to foster trust, transparency, and effective sector stewardship.

Recommendation 7: Invest in workforce training across agencies to improve regulatory effectiveness and consistency.

⁶ **Recommendation 1:** Define clear outcomes, objectives and principles for ECE regulation in legislation, aligning with government priorities for early childhood education.

Recommendation 6: Establish a strategic, long-term approach to ECE regulation that supports innovation, quality, and growth.





Striking the right balance

Regulation plays a critical role in ensuring tamariki safety and quality learning. Good practice regulation is not about removing rules, but ensuring they are proportionate to risk, outcome-focused, and consistently applied.

ECE supports tamariki during a period of rapid growth, development, and learning. Regulations must reflect this complexity by protecting tamariki and enabling rich, responsive learning environments. For this to work, the sector must trust the system: regulations must be fit for purpose, consistently implemented, and geared toward better outcomes. Working with the sector, to co-design and test options, will help gain that trust.

Prioritise tamariki, not profits

We advocate for ECE regulations that keep tamariki at the centre. ECE is about the education and care of our youngest and most vulnerable citizens, regulatory decisions should not be driven by commercial interests. A stable sector is essential, and financial viability matters, but the test for any regulatory decision must be: *how does this support the education, safety, and wellbeing of tamariki?*

Our ECE system includes a mix of public, private, and community-based providers. Such diversity allows parents to make choices that best suit their tamariki and whānau. Regulations need to support a diverse network of provision, while setting clear expectations for ethical practice, equity, and accountability.

No compromise on quality

Regulatory reform must support, not compromise, quality ECE. The Ministry for Regulation has recommended greater flexibility in workforce qualifications⁷, but we are unequivocal—*qualified kaiako are non-negotiable*. The evidence is clear that qualified ECE kaiako are essential to delivering high-quality education and care. Any moves to reduce the quality and training of the people that are looking after our tamariki is a massive backwards step for our sector, for the education of our children, and would risk undermining the very outcomes regulation is meant to protect: the learning, safety, and wellbeing of tamariki.

We were also disappointed that *teacher: child ratios* were deemed out of scope of the review, as these are unsafe and inadequate. Ratios are a fundamental component of quality ECE, directly impacting kaiako workload, tamariki safety and learning. Excluding them from the review was a missed opportunity to address one of the sector's most pressing concerns.

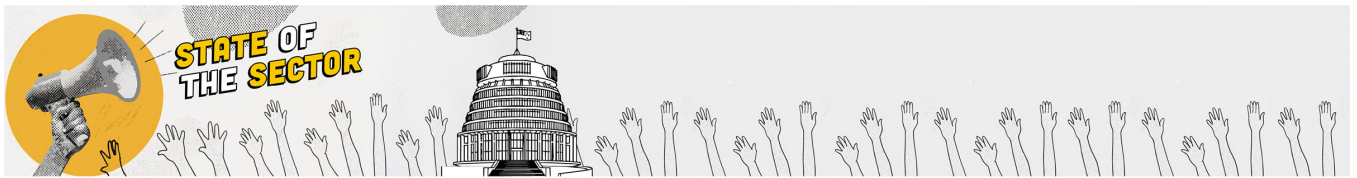
Kaiako qualifications and ratios, along with group size, form the 'iron triangle' of quality ECE. This is what we should be striving for.

Unintended consequences

Even well-meaning regulations can have unintended consequences if implementation is rushed or not carefully tested. An example is overly prescriptive requirements around documentation that can lead to

⁷ **Recommendation 10:** Allow greater flexibility in workforce qualifications to support access and quality across all areas and service types.





box-ticking and increased workload, rather than deeper reflection or improved practice. Similarly, rules intended to support safety may unintentionally limit children’s exploration or culturally responsive approaches.

To avoid unintended consequences, regulations must be tested for real-world impact across a diverse range of services. This means early sector engagement, co-design, modelling how changes would play out in practice, piloting, and refining based on evidence and experience. Regulators must be open to feedback and willing to iterate.

Together with our fellow leaders in the ECE Sector Partnership, we’ve offered to help test assumptions and pilot proposed changes to ensure they are fit for purpose.

Ministry for Regulation’s ECE Review: an opportunity for change

The Ministry for Regulation’s review represents a significant opportunity. As the Ministry’s inaugural sector review, ECE is effectively in the spotlight, potentially as a political test case. This makes it all the more important that the review’s recommendations are approached with care, not haste.

The review’s 15 recommendations include some common-sense proposals, such as improving communication and streamlining reporting, alongside broader ones that require more unpacking. Their success will depend on how they are implemented. Rushed reform risks repeating mistakes we should have learned from: disconnected changes, political interference, and unintended consequences.

Instead, this review should mark the beginning of a genuine partnership between government, regulatory agencies, and the sector. A process grounded in co-design, with space to test, evaluate, and refine, will lead to better outcomes.

A regulatory system that supports and enables quality ECE

ECE services and kaiako have an incredibly important role in shaping our future generations. They deserve a regulatory system that supports them to do this work well: one that is clear, coherent, and child-centric.

The current system is complex, compliance-heavy, and inconsistently applied. But rather than starting over, the focus should be on smarter regulation, shaped by a clear strategy, informed by sector experience, and a commitment to tamariki education and wellbeing.

The Ministry for Regulation’s review gives us the mandate for real change. As the first sector to undergo this kind of regulatory review, ECE can set the benchmark for reform done well — where tamariki remain at the centre, not overtaken by process or politics.

You can find more about the Ministry of Regulation’s [ECE Sector Review and final report here](#), and read our [submission here](#).

Media contact:

Rob McCann - Lead Communications Advisor | Kaitohutohu Whakapā Matua
Rob.McCann@ecnz.ac.nz Mob 022 411 4560

