

Policy Response: Reducing Teacher Qualification Requirements in ECE

Policy Briefing Paper for the Ministry of Education
Prepared by the Office of Early Childhood Education
24 Sept 2025

Purpose

1. This paper responds to Recommendations 10 and 11 from the Ministry for Regulation (MfR), which propose lowering qualification requirements for teachers in early childhood education (ECE) services. It provides analysis and policy advice to support the Ministry of Education in its decision-making and policy development process.

OECE Position

2. The Office of Early Childhood Education (OECE) **opposes any further reduction to existing qualification requirements** for registered and certificated teachers in ECE, as these standards already represent the bare minimum for quality. **Our position is grounded in empirical evidence and established best practice**, which consistently show that specialist ECE teaching qualifications are essential to safeguarding the wellbeing and supporting the learning of children in group ECE settings where their parents are not present.

We have heard directly from high-performing services, those that consistently meet Education Review Office (ERO) standards, that they could not maintain their quality if funding for qualified teachers is reduced or qualification requirements are weakened. Without adequate resources and staff who understand and can apply the principles underpinning ERO reviews, these services question how they will continue to meet ERO's expectations.

Background

3. The MfR's review proposes a series of changes to both the definition of a "qualified" ECE teacher and the requirements for having qualified teachers in services, including:

- Lowering the requirement for qualified teachers in centre-based services
- Redefining who counts as a qualified ECE teacher in licensing regulations. (Proposals we have viewed so far suggest that the role of qualified/certificated teachers could be replaced by personnel with general "hands-on" experience only or who are still in-training.)
- Further reducing or waiving qualification requirements in hard-to-staff areas, for socio-economically disadvantaged, and Māori and Pacific children.

4. It also proposes changing the licence capacity rules, which will impact on qualified staffing levels and the minimum number of ECE qualified staff on a licence. These changes include:

- Reducing transparency by removing licence capacity from licences, allowing services to enrol more children as they wish and if physical space permits, without needing to apply for a formal increase.

- Linking the number of required qualified teachers to child enrolment numbers rather than licensed capacity for the layout of space for safe supervision.

5. These proposals are part of the MfR's recommendations 10 and 11:

- **Recommendation 10:** "Allow greater flexibility in workforce qualifications to support access and quality across all areas and service types." (Instead of having a strategy to recruit, train and retain ECE teachers for those services that struggle to find/keep their teaching staff)
- **Recommendation 11:** "Ensure the person responsible requirements are practical, appropriate to meet the needs of children and purpose of the requirements, and responsive to service needs, including home-based services." (Instead of un-doing the change to have primary trained teachers able to be the Person Responsible)

See the attached appendix for a full list of proposals.

6. Our concerns are that the proposed changes would shift responsibility for pedagogy, child wellbeing, and engagement with parents and caregivers onto staff without specialised ECE training or formal teacher education. This shift not only undermines the integrity of the sector but also jeopardises the safety, development, and learning outcomes of our youngest children.

7. The Ministry of Education has been instructed to develop policy to implement the MFR's recommendations. Officials have assured the OECE that they are at the beginning of the policy process and that wider sector consultation will follow.

Flexibility: It Already Exists

8. Existing Operational Flexibility

The MfR implies that qualification requirements in the ECE sector are not flexible enough. But, the OECE believes that the current regulatory framework already provides significant leeway in staffing composition, raising serious questions about who stands to benefit from further deregulation. Moreover, ECE funding provisions already allow considerable operational flexibility and choice.

9. Licence Staffing Requirements

To hold a licence, teacher-led centres and hospital-based services must demonstrate that 50% of their staff, based on the number of enrolled children, are ECE-qualified. Centres can meet this threshold by:

- Counting one unqualified staff member who is enrolled in a recognised ECE qualification programme that can be completed within 12 months.
- Including qualified teachers rostered across multiple services, allowing the same teacher to count toward the 50% requirement at two sites.

10. Regulatory Changes Since 2020

A policy change introduced in January 2020 allows a Person Responsible in a teacher-led early childhood centre to hold a primary teaching qualification instead of an ECE teaching qualification. The Minister of Education described this as a temporary measure to help address staffing shortages.

However, the underlying issues such as high staff turnover (particularly in for-profit ECE centres) have not been effectively addressed. Pay parity was never fully achieved and is now being rolled back. Meanwhile, the regulatory changes to qualification requirements made in 2020 remain in place.

Read this paper online <https://oece.nz/newsroom/reviews-recommendations/policy-more-flexible-qualifications-requirements-teachers-ece/>

These unresolved problems are at the heart of the current situation. Instead of reversing the weakening of qualification standards, the Ministry for Regulation is now recommending even greater flexibility—further compounding the issue rather than solving it.

11. Funding Incentives for Non-ECE-Qualified Staff

Centres may claim funding for up to 80 hours of uncertificated staff time at the qualified teacher funding rate every four months. This level of discretionary funding was originally introduced as a temporary measure during the Covid-19 pandemic to alleviate pressure on services experiencing teacher shortages and to provide financial relief. Notably, the requirement to demonstrate attempts to find a certificated reliever has since been removed. In addition, funding is available to services employing teachers who hold primary school qualifications.

12. There's Already Flexibility for Different Service Types

Distinct ECE philosophies, such as Playcentre, Ngā Kōhanga Reo, and home-based ECE have qualification requirements tailored to their delivery approach. Their requirements differ from education and care centres and free kindergartens.

The Ministry of Education's funding model for education and care centres accommodates services with as few as 0–24% ECE-qualified staff.

Person Responsible Requirements Must Be Strengthened—Not Diluted

13. The Current Gap

At present, the Person Responsible in a teacher-led centre can be a beginning teacher or someone with a primary school teaching qualification. This leaves centres without a leader who has specialised expertise in early childhood education.

14. The Strengthened Standard

It should be non-negotiable that the Person Responsible role is held by a pedagogical leader with deep expertise in early childhood education. This person must be someone who is physically present while children are attending, holds a recognised ECE teaching qualification, and is equipped to guide high-quality practice, supervise adult educators, and ensure a safe, educationally appropriate learning environment. To do this, they must also have a thorough understanding of the daily conditions required to maintain full regulatory compliance.

Why Be Concerned? Adverse Consequences of Implementing MfR's Proposals

The adverse consequences of the Ministry for Regulation proposals include:

15. Risk to Equity and Vulnerable Children

Hard-to-staff areas, including rural communities and centres serving Māori and Pacific whānau, would be disproportionately affected. Removing qualification safeguards deepens existing inequities and limits access to quality education for children in communities where it can make the greatest difference.

16. Erosion of Professional Expertise

Infant and toddler pedagogy cannot be replaced by generic childcare experience or primary teaching credentials. Diluting qualifications undermines the specialised knowledge and skills required for effective teaching and care of infants and young children.

Read this paper online <https://oece.nz/newsroom/reviews-recommendations/policy-more-flexible-qualifications-requirements-teachers-ece/>

17. Loss of Incentives for Qualified Staff

Removing funding bands that reward services with higher proportions of qualified teachers will make it financially unsustainable for services to recruit and retain specialised staff, weakening the workforce and reducing quality across the sector.

18. Licence Capacity Flexibility

Linking staffing requirements to enrolment or actual attendance, whether calculated hourly or otherwise, has the potential to be deeply problematic unless appropriate numbers of qualified staff are linked to acceptable ratios. The Ministry for Regulation has not recommended mandating a specific proportion of ECE qualified teachers (e.g. 25%, 50%, 75% or 100%) in the required minimum staff-to-child ratio.

Additionally, allowing centres to control the enrolment of additional children based solely on available physical space without a formal licence review to confirm adequate staffing and qualifications and layout of space for safe supervision, risks overcrowding and exposing children to substandard care and education.

Evidence and International Consensus

19. Undermining Professional Standards

MfR's recommendations seek to reverse decades of political and sector advocacy that led to integrated kindergarten and childcare training and recognition of the Degree of Teaching (ECE) as the benchmark qualification for centre-based early childhood teachers.

“The early childhood points system has meant that a Person Responsible in respect of a licensed early childhood service is not required to have a specific qualification, but rather can have a blend of training courses and experience. However, research in NZ and overseas indicates that a coherent qualification is important to the quality of early childhood education.” (*Pitopito Kōrero, No. 17, Ministry of Education, 1988*)

20. Qualified Staff are Global Quality Indicator

Teacher education and qualification are among the top three global indicators of ECE service quality, forming part of the widely recognised “iron triangle” of quality, alongside group size and adult:child ratios.

21. Inequitable Access to Qualified Teachers Harms Children

Poor-quality ECE can be harmful. Children from disadvantaged backgrounds stand to benefit the most from high-quality provision, making equitable access to qualified teachers a matter of both educational and social justice. In New Zealand, services with fewer qualified teachers disproportionately serve Māori and Pasifika children and are often located in areas of high social deprivation. The lowest-quality centres tend to be concentrated where families have the least choice or access to ECE, compounding existing inequities.

22. Proposals are Contradicting Empirical Evidence

MfR's proposals run counter to both international and New Zealand research and expert consensus, for example:

“Higher teacher qualifications are significantly correlated with higher quality early childhood education and care. This finding is not dependent on culture and context given that the evidence is from several countries. Mandating qualified teachers, i.e. with tertiary education, may lead to significant improvement for both process and structural quality within centre-based and home-

based ECEC settings.” (*Campbell Systematic Review (which summarised findings from 48 studies with 82 independent samples, 2017)*)

“The work of early childhood education and care (ECEC) professionals is the major driver of the quality of an ECEC system.” (*OECD, 2018*)

In ECE “qualified teachers reported more frequently using key practices, for example, using conversation to extend language. ECE teachers who reported being extremely confident in their professional knowledge of how children’s language develops were up to seven times more likely to report using effective teaching practices regularly.” (*ERO Report, 2024*)

A 2012 study by Dr Anne Meade et al. researched differences between early childhood centres with 100% ECE-qualified teachers in ratio to those with 79% to 50%. Centres with 100% qualified teachers were more intentional in planning, more active in parent communication, and provided greater continuity of care for children under two.

“There appears to be no justification for the differences in salary between kindergarten [ECE] and primary teachers.” (*Education International, 2005*)

“The beginning point of a world-class education is to have appropriately skilled and knowledgeable, ECE qualified teachers.” (*ECE Teacher Supply & Workforce Strategy, OECE, 2024*)

Misleading Claims and Economic Framing

23. Questionable Evidence on Pay Parity

The Early Childhood Council (ECC) asserts that pay parity is driving centre closures, yet the Office of Early Childhood Education finds no evidence to support this claim. We have raised this fact with the Ministry of Education and associate minister of education David Seymour but have not received a response from either party. Despite this, the allegation has clearly shaped MfR’s recommendations on workforce qualifications and funding.

24. Narrow Economic Lens on Workforce Qualifications

MfR urges the Ministry of Education to conduct a cost–benefit analysis of its workforce qualification proposals. Affordability matters, but must be weighed against long-term value. Quality ECE is an investment in children’s development and societal wellbeing, not merely an expense. By reducing the debate to provider cost concerns, MfR undermines child wellbeing and learning outcomes.

25. Ignoring Preconditions

Regulatory relaxation is regarded as safe only in contexts with a highly qualified workforce and well-shared quality standards, such as the Nordic nations. Yet MfR proposes cutting licensing criteria and lowering qualification requirements to levels widely seen as “less than minimum” for safeguarding child safety and educational integrity, without reference to those preconditions.

26. Lack of Financial Accountability

The MfR’s economic framing unfolds amid limited financial transparency and reporting in the sector. The qualitative impacts on child development, learning outcomes, and long-term societal equity should drive policy decisions, and not be sacrificed to whims of individual politicians or short-term economic calculations.

For-Profit Operator Influence

27. Alignment with For-Profit Priorities

MfR's recommendations closely mirror the views of privatised, for-profit ECE operators, especially those represented by the Early Childhood Council (ECC). The ECC has publicly objected to calling staff without recognised ECE teaching qualifications "unqualified":

"There are 10,034 adults being reported as usual teaching staff who are not registered teachers... This is an obnoxious title... We do not need to be making value judgements about the worth of one group of adults compared to another." (*ECC Submission to MfR, 2024*)

28. Blurring the Line

Minimising, or softening, the distinction between "qualified" and "unqualified" ECE staff poses serious risks when adopted by a government department tasked with safeguarding children's learning and wellbeing. This approach invites public confusion about what "qualified" actually means and undermines the professional role of ECE-trained teachers. Clear, precise terminology is essential for effective regulation, accountability, and public trust. Far from being "obnoxious," the terms "qualified" and "unqualified" provide necessary clarity about the level of professional preparation required to ensure quality care and education.

29. Undermining Professional Standards

Erasing the distinction between "qualified" and "unqualified" staff doesn't remove a value judgment, it removes transparency. Calling staff without formal ECE training "unqualified" is both accurate and necessary to uphold professional benchmarks in the sector and to ensure clarity in respect to roles and responsibilities.

30. The Imperative of Formal Qualifications

High-quality, teacher-led ECE depends on adults with specialist expertise in pedagogy, child development, curriculum design, and regulatory compliance. This knowledge, skill and aptitude is only guaranteed through formal teacher education and registration. While experience and goodwill enrich practice, they cannot substitute for rigorous professional preparation.

Recommendations and Conclusion

The OECE recommends that the Ministry of Education:

31. Implements an effective strategy to recruit, train and retain ECE qualified teachers immediately.

32. Undoes changes to the Person Responsible requirements allowing non-ECE qualified/certificated teachers to hold this role.

33. Retains as minimum the existing qualification standards for early childhood teachers, or improves them – and that in so doing the needs of young children are placed at the centre.

34. Does not undermine the political and professional resolve built over the past three decades, specifically the recognition of the Bachelor of Teaching (ECE) as the benchmark qualification for teachers in teacher-led centre-based services.

35. Notes that reducing teacher qualification requirements poses clear risks to children's safety, learning outcomes, and equitable access to early childhood education.

36. Understands that employing an unqualified teacher over an ECE qualified teacher does not serve the best interests of children. There is no evidence to suggest that it does.

37. Upholds children’s rights by critically examining how MfR’s push for more “flexible” qualification requirements may contravene those rights.

38. Publicly rejects the implicit notion in MfR’s proposals that reduced qualification requirements are acceptable for services based on children’s ethnicity or family socio-economic status. The MfR’s stance will compound existing educational and economic disadvantages. Children from low-income households must remain a top priority, and the services they attend should be highly resourced with appropriately qualified ECE teachers.

39. It is unwise, especially amid weakened regulatory oversight and reduced licensing criteria, to develop or even consider making teacher qualification requirements for services “more flexible”.

Qualified ECE teachers provide a vital safeguard and voice for children and parents, particularly when the Ministry has fewer enforcement tools. This risk is heightened by the Early Childhood Council’s encouragement of litigation from providers challenging Ministry enforcement.

40. Rather than weakening workforce standards, policy should focus on constructive solutions, such as:

- Incentives to attract qualified teachers to underserved areas.
- Compulsory training for ECE service licence holders on ECE regulatory requirements, governance, and employer responsibilities, emphasising the importance of best employment practices to support teacher retention and ensure a well-supported, high-functioning team.

41. To protect the future of ECE as part of our national education system, we must create workplace environments where ECE qualified teachers are actively sought, professionally valued, and supported to build long-term careers. We must not allow current policy shifts to reduce ECE to a commercial enterprise focused on mass-scale babysitting.

42. The proposed changes to ECE qualifications must be examined within the wider context of regulatory reform. Treating qualifications in isolation risks fragmenting interconnected requirements that collectively underpin quality, safety, and accountability.

For instance, allowing experienced but unqualified staff to replace ECE-qualified teachers, alongside the removal of requirements to display staff qualifications, significantly reduces transparency for parents and weakens assurance of quality provision.

Similarly, changes to funding flexibility, ratios, or group size regulations have direct implications for qualification requirements and should not be considered separately. Each element has a compounding effect, and together they risk undermining both public trust and the quality of children’s education.

Appendix – Proposals Put Forward in the Ministry for Regulation Review Report

The following proposals were outlined in the Ministry for Regulation’s review report:

“Strike the right balance” between quality and availability of ECE provision by introducing more flexible qualification requirements. *(Note: This rationale is flawed. The availability or number of ECE services does not inherently depend on the qualifications of those providing care and education to children.)*

Apply more flexible qualification requirements for: services in rural areas, services in lower socio-economic areas, Māori and Pasifika, and home-based.

Allow teachers to qualify by experience, e.g. count toward qualified teacher requirements if they meet a threshold of years working in the sector or with children.

Allow vocational ECE qualifications to count toward meeting qualified teacher requirements.

Require vocational ECE qualifications for all ECE teachers (i.e. on-job training certificate less than a degree and not university/teacher education), with transitional arrangements to avoid adverse impacts on labour supply (e.g. exemptions for experienced staff).

Allow multiple staff members who are working toward ECE qualifications to count toward qualified teacher requirements (as permitted in some Australian states).

Relax qualification requirements for specific groups to enable alternative service models, potentially through licensing exemptions or conditional approvals.

Exempt certain home-based educators from qualification requirements, such as those with life experience, those in remote areas, or those with specific language skills.

Allow home-based educator work by qualified teachers to count toward maintaining a practising certificate with the Teaching Council.

Remove the link between funding levels and the number of certificated teachers, decoupling funding from staffing qualifications.

Use a consistent definition of “qualified teacher” across both regulatory and funding frameworks.

Split the ‘Person Responsible’ role in centre-based services into two distinct regulated positions (which may be held by one or two individuals):

- **Educational Lead:** Responsible for curriculum and teaching support/coaching; not required to be onsite.
- **Service Manager:** Must be onsite and responsible for health and safety, ratios, regulatory compliance, and operational oversight.

Base maximum licensed capacity solely on building suitability and resource consent conditions, and link the number of required qualified teachers to actual enrolment rather than licensed capacity.

Remove licence capacity from licences, allowing services to enrol more children if physical space permits, without needing to apply for a formal increase.

Require the Ministry of Education to conduct a full cost–benefit analysis of the above options to identify a preferred approach or combination that balances quality and supply.

Read this paper online <https://oece.nz/newsroom/reviews-recommendations/policy-more-flexible-qualifications-requirements-teachers-ece/>