



**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

# Modernising Early Childhood Education in Aotearoa New Zealand

**Proposed changes to the licensing criteria for early childhood services**

**Consultation report 2025**



**Te Kāwanatanga  
o Aotearoa**  
New Zealand Government

Published by the Ministry of Education,  
New Zealand, January 2026.

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[education.govt.nz](http://education.govt.nz)

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ISBN 978-1-75991-357-5 (Online)

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# Overview

**This report presents an analysis of feedback received through the consultation from 19 June to 24 July 2025 on proposed changes to early learning licensing criteria for centre-based, home-based, and hospital-based services. These proposed changes were outlined in recommendation 9 of the Ministry for Regulation’s early learning regulatory sector review. Recommendation 9 called for licensing criteria to be proportionate, effective, and supportive of quality without creating unnecessary burden for providers.**

Responses to proposed changes were collected via an online survey and submissions, enabling both quantitative and qualitative analysis. While survey responses were structured, submissions were more varied in format and scope, often providing longer, detailed commentary and including topics outside the consultation scope.

A total of 1,152 survey responses were received, 382 of which provided specific feedback on proposed amendments. There were also 97 submissions received. Responses from centre-based services made up the majority of responses to the survey, with home-based services contributing nine percent and hospital-based services one percent<sup>1</sup>. Most respondents were qualified ECE teachers and kaiako, managers, parents and whānau, or service owners. Participation was voluntary and may reflect self-selection bias.

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## Survey and Submission Feedback Summary

### **Survey responses – 1,152 (92% of total feedback received was via a survey)**

**Overall, responses across all service types indicated general support for many of the proposed changes.**

Attitude statement results from the survey, where participants were asked to choose between Strongly Agree, Agree, Disagree, or Strongly Disagree, indicated generally positive sentiment towards many of the proposed amendments. There was majority agreement on the four focus areas – whether respondents believed that a change reduced duplication, supported health and safety, made regulations easier to understand, and reduced compliance burden. Centre-based services displayed more variation in sentiment, with some proposals receiving lower agreement.

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<sup>1</sup> This largely reflects service types with home-based comprising 5.6 percent and hospital-based 0.45 percent of the sector [Ed Counts 2024]

## **Of the survey responses, 382 included further comments on the proposed amendments.**

Amendment-specific feedback showed:

- › Opposition to changes that reduced the frequency of emergency drills, extended sleep check intervals, lowered first-aid staffing ratios, or removed specific requirements (e.g., tempering valves, first aid kit contents, philosophy statements, annual planning).
- › Support for clearer, consolidated wording where it maintained safety and operational clarity.
- › Requests for evidence to support changes in technical requirements such as food storage temperatures.
- › Requests for guidance to accompany changes introducing more flexible or subjective criteria.

While some amendments were viewed as reducing duplication and administrative load without compromising safety or quality, many respondents sought retention of detailed, prescriptive requirements to ensure consistency, protect children’s wellbeing, and uphold professional standards across the sector.

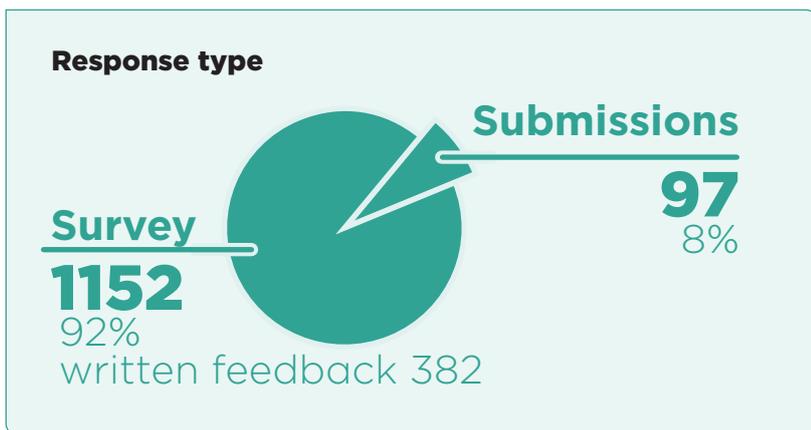
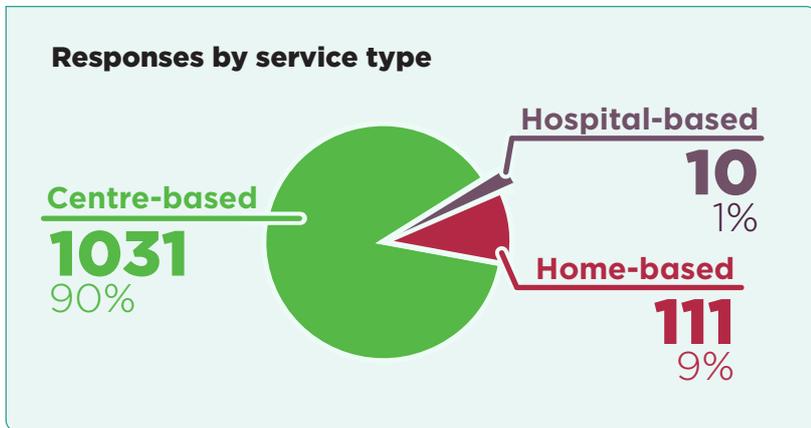
## **Overall written submissions**

**In addition to the 382 written responses provided in the survey, we also received 97 submissions. Taken as a whole, qualitative feedback emphasised several consistent themes:**

- › **Health and safety as a priority** – respondents often viewed certain proposals as potentially weakening health and safety requirements. Many opposed the framing of existing requirements as “compliance burdens”.
- › **Professional standards and accountability** – a strong link was made between clear, enforceable requirements and high-quality service delivery, staff morale, and public trust.
- › **Clarity of language** – terminology (e.g. comfortable temperature, timely access) was frequently identified as creating potential inconsistency in application and enforcement.
- › **Consultation process concerns** – some participants criticised survey framing, question structure, and the absence of neutral response options.

## Respondent demographics

The following graphs show the breakdown of participants who submitted responses to the consultation.



Participants	#
Qualified ECE teachers and kaiako	574
Parents, caregivers, and whānau	219
Managers	217
Individuals	212
Representatives	107
Service providers	98
Other teaching staff	46
Organisations	42
Others	31

## Limitations and considerations

Respondents provided feedback on the proposed licensing criteria changes either through an online survey or via submissions. The survey included attitude statements (where participants were asked to choose between *Strongly Agree*, *Agree*, *Disagree*, or *Strongly Disagree*) and open-ended questions at the end of each regulatory standard, enabling both quantitative and qualitative analysis.

Submissions were less structured in comparison, with respondents choosing which aspects of the proposed changes to comment on and how. Qualitative data from submissions was not directly comparable with the structured survey responses as a result, limiting the ability to fully integrate findings across both feedback channels.

Submissions were, on average, significantly longer than the responses provided to the survey's open-ended questions. This resulted in a higher volume of qualitative data from submissions relative to the number of respondents. They also frequently referenced changes to curriculum licensing criteria and teacher qualifications, which were not represented in the survey and are out of scope for this consultation. This may have affected general sentiment across email submissions.

Participation in the consultation was voluntary, which may have introduced self-selection bias, with more engaged individuals or those holding strong views being overrepresented. Engaging in the consultation also required internet access, digital literacy, and written communication skills, which may have affected how well the feedback represents nonparticipating stakeholders.

Respondents from hospital-based early learning services represented a very small proportion of the overall response pool, with only 10 survey submissions out of 1152. These responses also contained limited qualitative feedback. This low representation aligns with the specialist nature of hospital-based early learning services, which make up a small proportion of licensed providers nationally, with 20 licensed services.

Any qualitative analysis undertaken is based solely on self-reported perspectives. It does not include independent observational or administrative data, nor does it allow for clarification or validation of the information provided. Where email respondents did not explicitly state their role or service, their feedback was categorised as coming from an independent community member. This limited the ability to analyse responses by role or service type.

While anonymisation safeguards respondent privacy, it also limits the ability to disaggregate findings by region, service type, or size. Finally, prevalence descriptors used in the analysis reflect the relative frequency of themes within submissions, rather than the absolute number of children, services affected or who a submitter was representing.

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## Methodology

### Quantitative data: survey responses

All responses to attitude statements (where participants were asked to choose between *Strongly Agree*, *Agree*, *Disagree*, or *Strongly Disagree*) were categorised as quantitative data. Those responses were grouped into subcategories for granular analysis of specific consultation areas:

- › **Amendment data** – where data related to specific proposed changes were grouped together.
- › **Focus area data** – where data were grouped based on the key area of interest they relate to (whether respondents believed that a change *reduced duplication*, *supported health and safety*, made regulations *easier to understand*, and *reduced compliance burden*).
- › **Service type data** – where data were grouped based on the service type that respondents represented (centre-based, home-based or hospital-based).

That data was used to produce net agreement scores and sentiment analysis, and to show agreement distribution for each attitude statement.

Open-ended survey questions, where respondents could write freely, were categorised as qualitative data and analysed according to the methodology described below.

## Qualitative data: survey responses and email submissions

Analysis of qualitative data drew on each of the 382 written survey responses and each of the 97 submissions received throughout the consultation period.

The 382 respondents provided feedback on at least one long-form question in the survey (360 respondents in the centre-based, 20 in the home-based and two in hospital-based survey).

The submission dataset comprised of more than five hundred pages of submissions from teachers, centre leaders, home-based and parent-led providers, professional bodies, unions, and individual whānau. All personal identifiers were removed before analysis.

Since almost every submission followed its own unique structure and format, an iterative thematic-analysis framework was adopted (informed by Braun and Clarke's six-phase method). First, each submission was read in full to achieve immersion and note preliminary ideas. The aggregated submissions were then divided into seven manageable tranches (~60 pages each) for systematic coding.

An initial list of codes (labels to help categorise key ideas in and across submissions) was created from the first tranche, using the participants' own words. That code list was then used to categorise responses in the other tranches, adding new codes and adjusted existing ones to reflect new or nuanced ideas. A final analysis of all tranches using the comprehensive code list was completed once iterative updates no longer produced new meaningful ideas (the saturation point).

Saturation was reached when two tranches in a row added no new major codes, and there less than 10 percent growth in subcodes, and there were no changes to theme definitions.

Two types of saturation were tracked:

- › Code saturation (no new key ideas).
- › Meaning saturation (no new depth or nuance to existing ideas).

A code became a theme if it:

- › Appeared in at least 30 percent of submissions.
- › Showed up across multiple service types or tranches.
- › Stayed consistent over time.

Codes were then organised into candidate themes that reflected shared meaning and policy relevance. Themes were reviewed against the entire dataset to ensure internal coherence and clear distinctions between themes. A set of prescribed prevalence descriptors was applied:

- › Most = ideas expressed by more than 70 percent of submissions.
- › Many = 50–70 percent.
- › Some = 30–50 percent.

Codes appearing in fewer than 30 percent of submissions were included only when analytically significant – for example, when they highlighted potential implementation risks.

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# Survey response analysis

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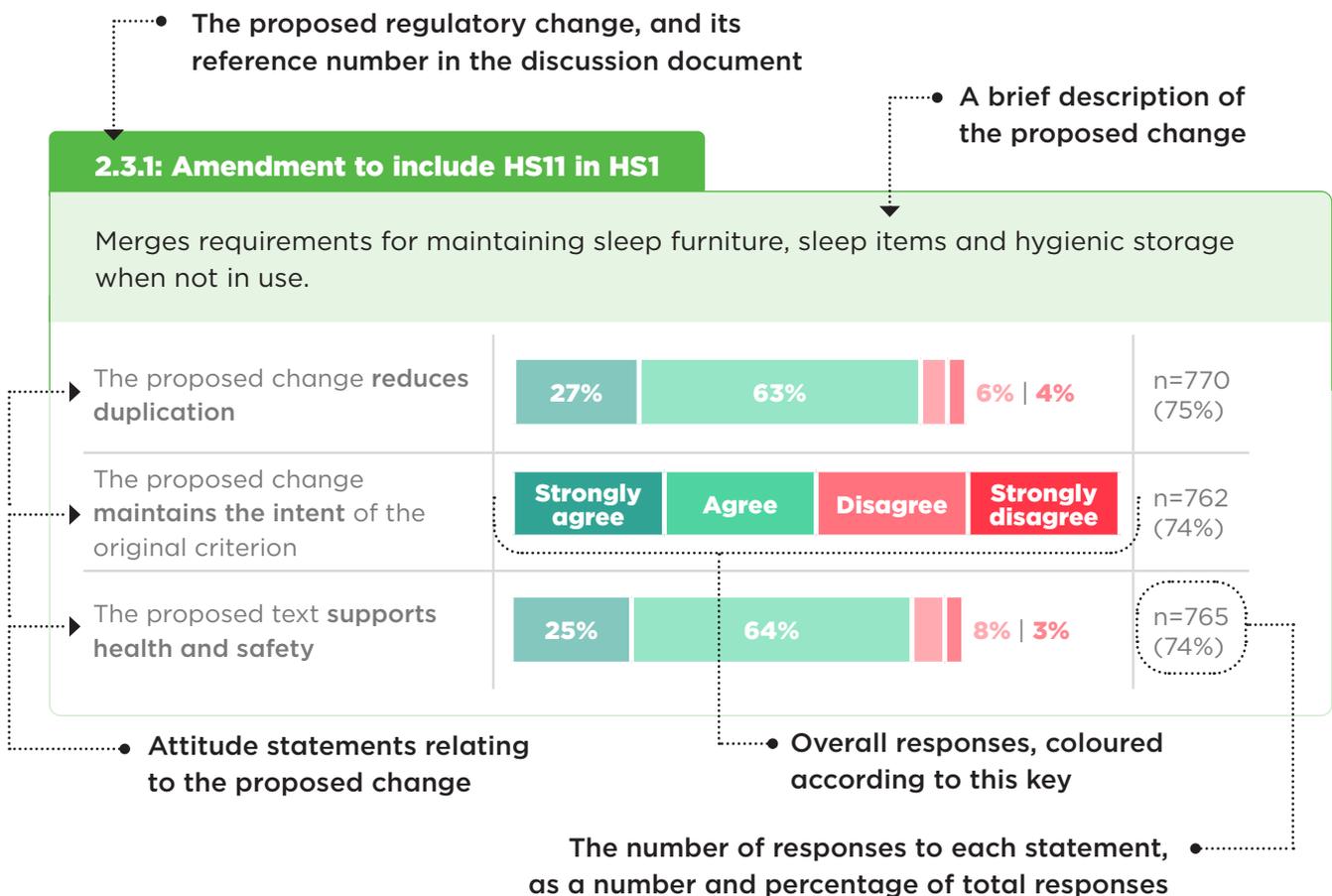


## Reading the data

The survey asked participants to answer a combination of long-form questions and attitude statements related to the proposed regulatory changes.

Each attitude statement used a Likert scale, where respondents chose the answer that best described how they felt. The image below explains how to read participants' responses to those statements.

Analysis of long-form responses relating to specific amendments can be found beneath the data breakdown for that amendment.

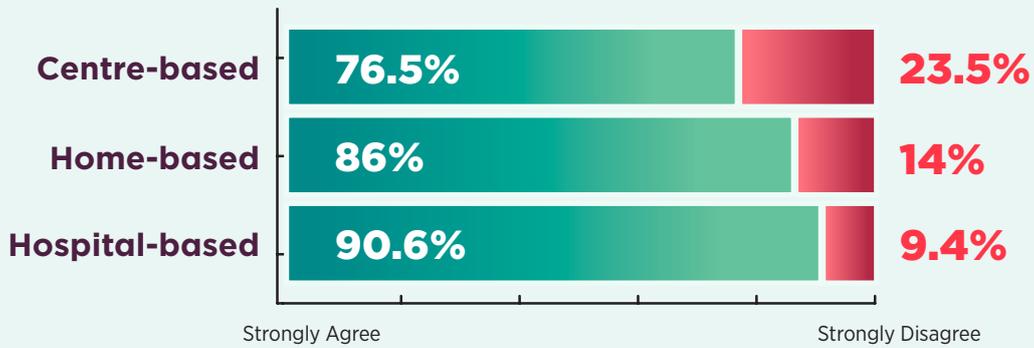


■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

## General survey sentiment

### General sentiment

This gives the total percentage of all survey responses that were **positive** (Strongly Agree or Agree), and **negative** (Disagree or Strongly Disagree) across each service type:

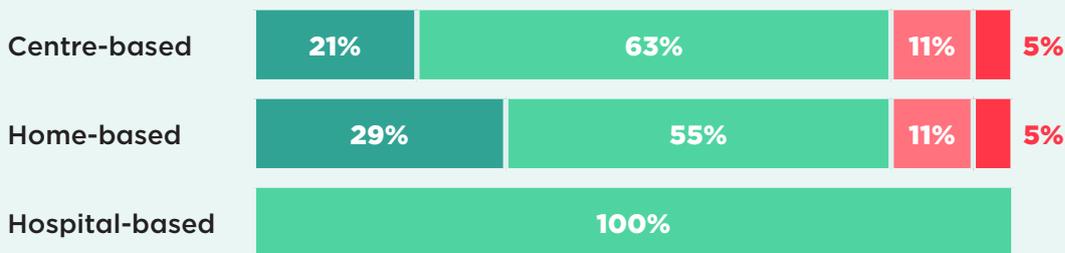


## Agreement levels by focus areas

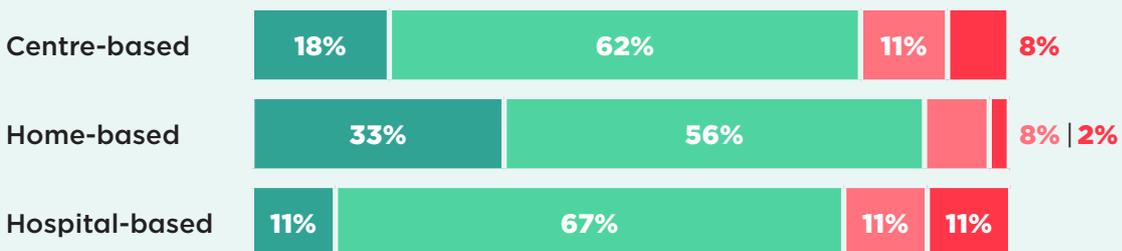
The following graphs show the distribution of all attitude statement responses (*Strongly Agree*, *Agree*, *Disagree*, or *Strongly Disagree*) in the survey related to the four focus areas.

Percentages have been rounded to the nearest whole number for readability.

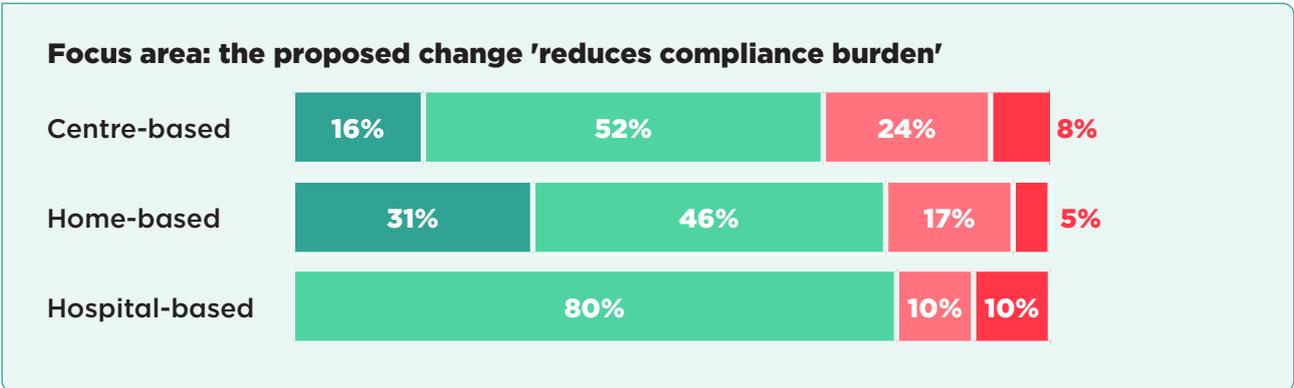
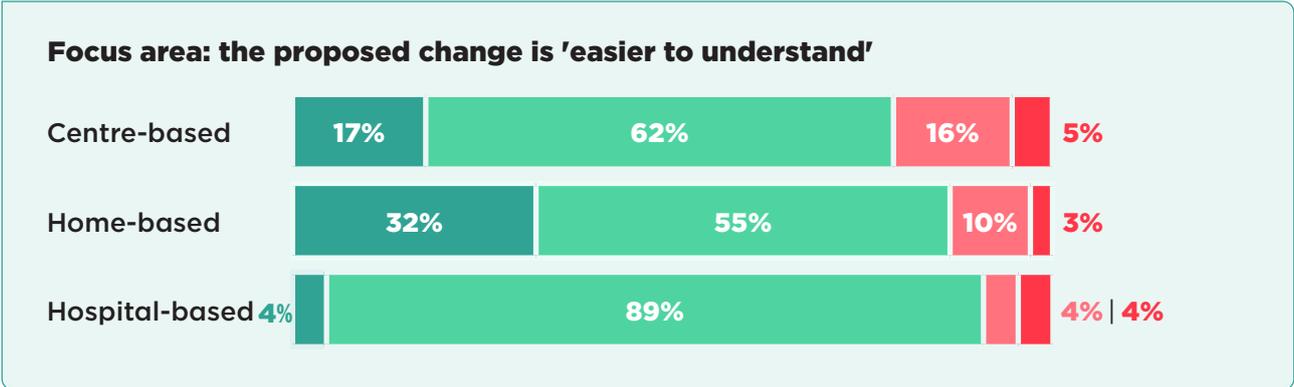
### Focus area: the proposed change 'reduces duplication'



### Focus area: the proposed change 'supports health and safety'



■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree



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# Centre-based survey analysis

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Strongly agree Agree Disagree Strongly disagree

# Centre-based survey analysis

## Amendment breakdown

### 2.3.1: Amendment to include HS11 in HS1

Merges requirements for maintaining sleep furniture, sleep items and hygienic storage when not in use.

The proposed change <b>reduces duplication</b>	27%	63%	6%   4%	n=770 (75%)
The proposed change <b>maintains the intent</b> of the original criterion	25%	64%	8%   4%	n=762 (74%)
The proposed text <b>supports health and safety</b>	25%	64%	8%   3%	n=765 (74%)

### 2.3.2: Amendment to HS2

Removes documentation requirement while maintaining the requirement for hygienic laundry practices.

The proposed text is <b>easy to understand</b>	28%	63%	5%   4%	n=755 (73%)
The proposed change <b>supports health and safety</b>	25%	63%	7%   5%	n=753 (73%)

### 2.3.3: Amendment to include HS5 in HS7

Merges and removes unnecessary duplication and simplifies emergency planning requirements

The proposed change <b>reduces duplication</b>	22%	66%	9%   3%	n=681 (66%)
The proposed change makes it <b>easier for services to comply with requirements</b>	19%	61%	17%   3%	n=677 (66%)

Strongly agree Agree Disagree Strongly disagree

### 2.3.4: Amendment to include HS6 in HS12

Merges criteria to include securing furniture as a part of hazard management.

The proposed change <b>reduces duplication</b>	13% 52% 29% 5%	n=632 (61%)
The proposed change makes it <b>easier for services to comply with requirements</b>	14% 55% 26% 5%	n=635 (62%)
The proposed text <b>supports health and safety</b>	11% 45% 38% 6%	n=627 (61%)

### 2.3.5: Amendment to HS8

Allows for less frequent emergency drills, from three to four months.

The proposed change <b>reduces compliance burden</b>	21% 52% 18% 9%	n=622 (60%)
The proposed change makes it <b>easier for services to comply with requirements</b>	19% 54% 18% 8%	n=622 (60%)
The proposed change <b>supports child health and safety</b>	15% 42% 23% 21%	n=627 (61%)

### 2.3.6: Amendment to HS9

Clarifies requirements and extends the sleep monitoring interval from 5-10 to 10-15 minutes.

The proposed change <b>reduces compliance burden</b>	15% 44% 23% 18%	n=615 (60%)
The proposed change makes it <b>easier for services to comply with requirements</b>	14% 46% 23% 17%	n=615 (60%)
The proposed change <b>supports child health and safety</b>	9% 25% 24% 42%	n=621 (60%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.3.7: Amendment to HS14

Clarifies criterion by adding the requirement to inspect malfunctioning hot water cylinders.

The proposed change makes it <b>easier for services to comply with requirements</b>		n=598 (58%)
The proposed change <b>maintains the intent of the original criterion</b>		n=602 (58%)
The proposed change <b>supports health and safety</b>		n=601 (58%)

### 2.3.8: Amendment to HS16

Clarifies safe and hygienic animal handling practices.

The proposed change makes it <b>easier to understand requirements</b>		n=595 (58%)
The proposed change makes it <b>easier for services to comply with requirements</b>		n=591 (57%)
The proposed change <b>supports health and safety</b>		n=596 (58%)

### 2.3.9: Amendment to HS17

Clarifies practices and documentation required for excursions.

The proposed change makes it <b>easier to understand requirements</b>		n=566 (55%)
The proposed change <b>reduces compliance burden for service</b>		n=569 (55%)
The proposed change <b>more clearly defines what must be provided to family and whānau</b>		n=566 (55%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.3.10: Amendment to include HS21 in HS19

Merges nutrition and drinking water criteria.

The proposed change makes it <b>easier to understand requirements</b>		n=558 (54%)
The proposed change <b>reduces compliance burden for service</b>		n=554 (54%)
The proposed change is <b>easy to understand</b>		n=554 (54%)

### 2.3.11: Amendment to HS22

Clarifies supervision while eating requirements and supports flexibility in how food related choking guidance is shared with parents.

The proposed change makes it <b>easier to understand requirements</b>		n=552 (54%)
The proposed change <b>more clearly defines what must be provided</b> to family and whānau		n=546 (53%)
The proposed change <b>reduces compliance burden for service</b>		n=544 (53%)

### 2.3.12: Amendment to HS24

Allows for brief room temperature fluctuations.

The proposed change makes it <b>easier to understand requirements</b>		n=551 (53%)
The proposed change <b>reduces compliance burden for service</b>		n=543 (53%)
The proposed change <b>supports health and safety</b>		n=546 (53%)

Strongly agree Agree Disagree Strongly disagree

### 2.3.13: Amendment to HS25

Allows for a temporary reduction in first aid qualified staff when getting medical assistance for a child.

The proposed change <b>maintains the intent of the original criterion</b>	15%	56%	17%	12%	n=536 (52%)
The proposed change makes it <b>easier to understand requirements</b>	14%	51%	23%	11%	n=534 (52%)
The proposed change <b>supports health and safety</b>	15%	49%	19%	18%	n=538 (52%)

### 2.3.14: Amendment to HS28

Removes category 1 medicine requirements which can be met through other criteria.

The proposed change makes it <b>easier to understand requirements</b>	16%	60%	18%	6%	n=517 (50%)
The proposed change <b>supports health and safety</b>	17%	63%	12%	7%	n=515 (50%)
The proposed change <b>reduces compliance burden for service</b>	15%	49%	28%	8%	n=510 (50%)

### 2.3.15: Amendment to HS29

Clarifies information and training requirements for administering medicine.

The proposed change makes it <b>easier to understand requirements</b>	23%	60%	13%	4%	n=507 (49%)
The proposed change <b>supports health and safety</b>	22%	59%	12%	7%	n=506 (49%)
The proposed change <b>maintains the intent of the original criterion</b>	22%	62%	10%	6%	n=508 (49%)

Strongly agree Agree Disagree Strongly disagree

### 2.3.16: Amendment to HS31

Clarifies and strengthens child protection policy review requirements.

The proposed change <b>maintains the intent of the original criterion</b>		n=493 (48%)
The proposed change <b>supports health and safety</b>		n=490 (48%)
The proposed change makes it <b>easier to understand requirements</b>		n=493 (48%)

### Amendment to HS34

See feedback from written submissions below as HS34 was not included in the survey for centre-based.

### 2.4.1: Amendment to merge PF1 and PF2

Merges design and layout requirements while supporting effective supervision.

The proposed change makes it <b>easier to understand requirements</b>		n=424 (41%)
The proposed change <b>reduces compliance burden for service</b>		n=422 (41%)

### 2.4.2: Amendment to PF4

Clarifies requirements for appropriate equipment, furnishings, and materials provided.

The proposed change <b>reduces compliance burden for service</b>		n=416 (40%)
The proposed change makes it <b>easier to understand requirements</b>		n=419 (41%)

Strongly agree Agree Disagree Strongly disagree

### 2.4.3: Amendment to PF9

Clarifies requirements for adult workspaces to exclude children.

The proposed change makes it <b>easier to understand requirements</b>		n=420 (41%)
The proposed change <b>doesn't create additional compliance burden for services</b>		n=417 (40%)
The proposed change will be <b>easy for services to implement</b>		n=415 (40%)

### 2.4.4: Amendment to PF12

Removes reference to a specific temperature, instead focuses on having a safe and effective way of maintaining a comfortable room temperature.

The proposed change makes it <b>easier to understand requirements</b>		n=416 (40%)
The proposed change <b>doesn't create additional compliance burden for services</b>		n=414 (40%)
The proposed change <b>reduces duplication</b>		n=411 (40%)

### 2.4.5: Amendment to PF13

Clarifies expectations around safety in, and access to outdoor spaces.

The proposed change makes it <b>easier to understand requirements</b>		n=411 (40%)
The proposed change <b>doesn't create additional compliance burden for services</b>		n=407 (40%)
The proposed change <b>should be easy for services to implement</b>		n=408 (40%)

Strongly agree Agree Disagree Strongly disagree

### 2.4.6: Amendment to PF14

Clarifies that safe spaces for infants can include older children.

The proposed change makes it <b>easier to understand requirements</b>	21%	66%	11%	3%	n=395 (38%)
The proposed change <b>supports health and safety</b>	19%	67%	12%	3%	n=394 (38%)
The proposed change <b>should be easy for services to implement</b>	20%	66%	12%	5%	n=394 (38%)

### 2.4.7: Amendment to include HS20 in PF16

Merges criteria and targets services not registered with National Programme 2 and aligns with MPI guidance.

The proposed change makes it <b>easier to understand requirements</b>	15%	66%	14%	5%	n=390 (38%)
The proposed change <b>doesn't create additional compliance burden for service</b>	14%	68%	14%	4%	n=388 (38%)

### 2.4.8: Amendment to include PF20 and PF22 in PF18

Merges the toilet requirements into one criterion.

The proposed change makes it <b>easier to understand requirements</b>	17%	62%	17%	4%	n=393 (38%)
The proposed change <b>doesn't create additional compliance burden for service</b>	17%	67%	12%	4%	n=390 (38%)
The proposed change <b>supports health and safety</b>	18%	64%	12%	6%	n=391 (38%)

Strongly agree Agree Disagree Strongly disagree

### 2.4.9: Amendment to include PF20 and PF21 in PF19

Merges handwashing and hand drying requirements into one criterion.

The proposed change makes it <b>easier to understand requirements</b>	16%	68%	13%	3%	n=384 (37%)
The proposed change <b>doesn't create additional compliance burden for service</b>	17%	72%	9%	3%	n=381 (37%)
The proposed change <b>supports health and safety</b>	18%	72%	7%	3%	n=382 (37%)

### 2.4.10: Amendment to PF23

Clarifies that there are toilet and handwashing facilities available for adults.

The proposed criterion <b>should be retained</b>	22%	66%	8%	3%	n=390 (38%)
The proposed criterion is <b>easier to understand</b>	21%	66%	9%	3%	n=388 (38%)

### 2.4.11: Removal of PF24

Removes the requirement to have a tempering valve as safe water temperature is required in another criterion.

Removing this criterion <b>doesn't negatively impact health and safety</b>	12%	45%	20%	24%	n=384 (37%)
<b>HS13 already makes sure</b> water is kept at a safe temperature	17%	54%	20%	10%	n=384 (37%)
The removal of PF24 <b>reduces unnecessary compliance burden for services</b>	14%	43%	27%	17%	n=381 (37%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.4.12: Amendment to PF28

Removes the requirement for services to have specific items in their first aid kit. Instead, services must regularly check and restock first aid kits.

The proposed change <b>should be easy for services to implement</b>		n=385 (37%)
The proposed change <b>supports health and safety</b>		n=386 (37%)
The proposed change makes it <b>easier to understand requirements</b>		n=385 (37%)

### 2.4.13: Amendment to merge PF29 and HS10

Merges sleep design and spacing requirements.

There should be <b>separate sleep requirements</b> for sessional services and all-day services		n=386 (37%)
The proposed change <b>supports health and safety</b>		n=383 (37%)
The proposed change makes it <b>easier to understand requirements</b>		n=383 (37%)

### 2.4.14: Amendment to include PF31 in PF30

Merges bedding and furniture requirements.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=373 (36%)
The proposed change <b>supports health and safety</b>		n=379 (37%)
The proposed change makes it <b>easier to understand requirements</b>		n=379 (37%)

Strongly agree Agree Disagree Strongly disagree

### 2.4.15: Amendment of PF32

Clarifies requirements for sessional services to provide appropriate places to sleep.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=329 (32%)
The proposed change <b>supports health and safety</b>		n=331 (32%)
The proposed change makes it <b>easier to understand requirements</b>		n=334 (32%)

### 2.4.16: Amendment to include PF34 in PF33

Merges the sleep furniture and space requirements for sleep at all-day services.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=368 (36%)
The proposed change <b>supports health and safety</b>		n=365 (35%)
The proposed change makes it <b>easier to understand requirements</b>		n=368 (36%)

### 2.4.17: Amendment to include PF36 in PF35

Merges the sleep furniture and space requirements, for children under two, at sessional services.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=305 (30%)
The proposed change <b>supports health and safety</b>		n=304 (30%)
The proposed change makes it <b>easier to understand requirements</b>		n=306 (30%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.4.18: Amendment to include PF38 in PF37

Merges the sleep furniture and space requirements, for children under two, at all-day services.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=348 (34%)
The proposed change <b>supports health and safety</b>		n=347 (34%)
The proposed change makes it <b>easier to understand requirements</b>		n=350 (34%)

### 2.5.1: Amendment to GMA1

Removes some requirements to display information to parents and whānau.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=314 (30%)
The proposed change <b>meets the needs of parents and whānau</b>		n=317 (31%)
The proposed change makes it <b>easier to understand requirements</b>		n=312 (30%)

### 2.5.2: Amendment to merge GMA2 with GMA3

Merges requirements for how information is shared with parents and whānau.

The proposed change <b>reduces duplication</b>		n=309 (30%)
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■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.5.4: Amendment to GMA4

Allows services to provide digital evidence of parental involvement.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=301 (29%)
The proposed change <b>meets the needs of parents and whānau</b>		n=306 (30%)
The proposed change makes it <b>easier to understand requirements</b>		n=303 (29%)

### 2.5.5: Removal of GMA5

Removes criterion to have a philosophy statement.

The proposed change <b>reduces unnecessary compliance burden for services</b>		n=299 (29%)
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### 2.5.6: Amendment to GMA6

Clarifies requirements for self-review and internal evaluation.

The proposed change <b>doesn't increase compliance burden for services</b>		n=390 (38%)
The proposed change makes it <b>easier to understand requirements</b>		n=388 (38%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 2.5.7: Removal of GMA7

Removes criterion for HR management.

The proposed change **reduces unnecessary compliance burden for existing services**



n=291  
(28%)

### 2.5.8: Amendment to GMA8

Removes the annual planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant does not hold a current licence.

The proposed change **reduces unnecessary compliance burden for existing services**



n=289  
(28%)

The proposed change **helps manage risks related to new services** entering the market



n=286  
(28%)

The proposed change makes it **easier to understand requirements**



n=288  
(28%)

### 2.5.9: Amendment to GMA9

Removes the annual planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant does not hold a current licence.

The proposed change **reduces unnecessary compliance burden for existing services**



n=285  
(28%)

The proposed change **helps manage risks related to new services** entering the market



n=284  
(28%)

The proposed change makes it **easier to understand requirements**



n=285  
(28%)

Strongly agree Agree Disagree Strongly disagree

### 2.5.10: Amendment to merge GMA11 and GMA 10

Merges requirements for maintaining enrolment and attendance records.

The proposed change reduces duplication		n=289 (28%)
The proposed change reduces compliance burden		n=285 (28%)
The proposed change makes it easier to understand requirements		n=290 (28%)

## Qualitative feedback on specific amendments

As part of the survey 360 respondents provided additional feedback on proposed centre-based amendments

### 2.3.2 Amendment to HS2

**Removes documentation requirement while maintaining the requirement for hygienic laundry practices.** n=14

The removal of documentation requirements in the proposed amendment prompted some concern in all 14 respondents who consistently linked documentation to liability protection for services and staff.

### 2.3.5 Amendment to HS8

**Allows for less frequent emergency drills, from three to four months.** n=37

Many respondents opposed extending drills from three to four months, noting concerns about young children’s memory retention and the need for regular practice to maintain emergency preparedness.

A range of feedback noted that longer intervals between drills increased the likelihood that new children and staff would miss multiple practice sessions. Some specifically advocated for monthly fire and earthquake drills, while being more comfortable accepting quarterly schedules for other emergency procedures.

### 2.3.6 Amendment to HS9

**Clarifies requirements and extends the sleep monitoring interval from 5-10 to 10-15 minutes.**

**n=117**

Most feedback expressed strong opposition to proposed changes in sleep monitoring requirements under HS9, where it is proposed to extend the current requirement for checking sleeping children from every 5-10 minutes to 10-15 minutes.

Respondents had particular concern for infants and children under two years, with many requesting age-specific monitoring requirements. Feedback consistently linked shorter check intervals to professional responsibility and child safety outcomes.

### 2.3.10 Amendment to HS22

**Clarifies supervision while eating requirements and supports flexibility in how food related choking guidance is shared with parents.**

**n=41**

The phrase “close proximity” in the proposed amendment raised concerns in many submissions, who described it as too vague for practical implementation. More specific language was called for around supervisors maintaining visual contact with eating children.

### 2.3.12: Amendment to HS24

**Allows for brief room temperature fluctuations.**

**n=59**

Some respondents would like clearer definitions for the terms “brief periods” and “fluctuating temperatures”. There was also concern about floor-based infants and sleeping children (who might be more susceptible to temperature variations).

### 2.3.13: Amendment to HS25

**Allows for a temporary reduction in first aid qualified staff when getting medical assistance for a child.**

**n=27**

Many respondents opposed the proposed reduction of first aid qualified staff to 1:50 children. Some advocated for universal first aid certification among all staff working with children.

### 2.3.15: Amendment to HS29

**Clarifies information and training requirements for administering medicine.**

**n=27**

The removal of record-keeping obligations raised concerns in some submissions.

**2.3.16: Amendment to HS31****Clarifies and strengthens child protection policy review requirements. n=29**

This amendment received mixed feedback – some respondents appreciated clearer language, and others who questioned the value of requiring hypothetical scenario evaluations.

**2.4.5: Amendment to PF13****Clarifies expectations around safety in, and access to outdoor spaces. n=30**

Many respondents criticised lack of clarity in proposed language changes that would allow limiting outdoor access “at appropriate times,” and suggested possibilities for misuse. Concerns were raised around the ability for this clause to be used for staff convenience, rather than genuine safety issues. In general, feedback emphasised the importance of outdoor access for child development.

**2.4.7: Amendment to include HS20 in PF16****Merges criteria and targets services not registered with National Programme. n=13**

Some respondents questioned why there was a proposed shift in food storage temperature requirements from 4°C to 5°C for refrigeration. Evidence for the change was requested.

**2.4.10: Amendment to PF23****Clarifies that there are toilet and handwashing facilities available for adults. n=5**

Respondents noted that adult toilets should be separate from children’s facilities.

**2.4.11: Removal of PF24****Removes the requirement to have a tempering valve as safe water temperature is required in another criterion. n=12**

There was strong opposition to removing the tempering valve requirement, citing serious safety concerns. Concerns were raised that the alternative HS13 criterion provided insufficient protection against scalding risks.

### 2.4.12: Amendment to PF28

**Removes the requirement for services to have specific items in their first aid kit. Instead, services must regularly check and restock first aid kits. n=13**

Some respondents opposed removing specific first aid kit content requirements, expressing concerns about maintaining adequate emergency supplies. Respondents suggested that removing Appendix 1 would allow for inconsistent and subjective resourcing of first aid kits as a result.

### 2.5.2: Amendment to merge GMA2 with GMA3

**Merges requirements for how information is shared with parents and whānau. n=29**

Many respondents expressed concern about the reduction of information on display for parents and whānau, emphasising the importance of transparency and parental rights. Some saw that visibility as “an indication of a professional, regulated sector” and others saw it as critical to service accountability and effective complaint mechanisms.

### 2.5.5: Removal of GMA5

**Removes criterion to have a philosophy statement. n=192**

Most respondents opposed the removal, noting potential impacts on decision making for parents, whānau and staff, limiting quality assurance and that setting out the uniqueness of the service supports identity and connection.

Some supported removal, suggesting the statements were an unnecessary administrative burden, duplicative, or something that would be carried out regardless of the requirement.

Others suggested voluntary adoption, integration with other required documents, or flexible formats for expressing service values.

### 2.5.6: Amendment to GMA6

**Clarifies requirements for self-review and internal evaluation. n=40**

Many respondents expressed concerns about weakening internal evaluation requirements, emphasising they were essential for improved teaching quality and professional development – and therefore positive outcomes for children, and did not consider them to be an administrative burden.

### 2.5.7 Removal of GMA7

**Removes criterion for HR management. n=58**

Most respondents opposed the removal of professional development provisions, which were emphasised as an essential component of positive learning outcomes and safety for learners, and accountability, protection, and performance management for staff.

Some supported the removal, suggesting that employment law provides adequate coverage and therefore does not require sector-specific regulation.

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# Home-based survey analysis

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# Home-based survey analysis

## Amendment breakdown

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.3.1: Amendment to merge HS1 with HS10

Merges requirements for maintaining sleep furniture, sleep items and hygienic storage when not in use.

The proposed change <b>reduces duplication</b>		n=68 (62%)
The proposed change <b>maintains the intent</b> of the original criterion		n=70 (64%)
The proposed text <b>supports health and safety</b>		n=70 (64%)

### 3.3.2: Amendment to HS2

Removes documentation requirement while maintaining the requirement for hygienic laundry practices.

The proposed text is <b>easy to understand</b>		n=70 (64%)
The proposed change <b>supports health and safety</b>		n=71 (65%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.3.3: Amendment to merge HS4 with HS5

Merges and removes unnecessary duplication and simplifies emergency planning requirements

The proposed change <b>reduces duplication</b>	<div style="display: flex; align-items: center;"> <div style="width: 35%; background-color: #008080; color: white; text-align: center; padding: 5px;">35%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">47%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">12%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">7%</div> </div>	n=60 (55%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; align-items: center;"> <div style="width: 27%; background-color: #008080; color: white; text-align: center; padding: 5px;">27%</div> <div style="width: 31%; background-color: #00B050; color: white; text-align: center; padding: 5px;">58%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">7%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">8%</div> </div>	n=60 (55%)

### 3.3.4: Amendment to merge HS6 with HS11

Merges criteria to include securing furniture as a part of hazard management.

The proposed change <b>reduces duplication</b>	<div style="display: flex; align-items: center;"> <div style="width: 30%; background-color: #008080; color: white; text-align: center; padding: 5px;">30%</div> <div style="width: 31%; background-color: #00B050; color: white; text-align: center; padding: 5px;">61%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">7%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=56 (51%)
The proposed change <b>improves health and safety</b>	<div style="display: flex; align-items: center;"> <div style="width: 22%; background-color: #008080; color: white; text-align: center; padding: 5px;">22%</div> <div style="width: 43%; background-color: #00B050; color: white; text-align: center; padding: 5px;">65%</div> <div style="width: 11%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">11%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=55 (50%)
The proposed change makes it <b>easier for services to meet compliance</b>	<div style="display: flex; align-items: center;"> <div style="width: 22%; background-color: #008080; color: white; text-align: center; padding: 5px;">22%</div> <div style="width: 43%; background-color: #00B050; color: white; text-align: center; padding: 5px;">65%</div> <div style="width: 13%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">13%</div> </div>	n=55 (50%)

### 3.3.5: Amendment to HS7

Allows for less frequent emergency drills, from three to four months.

The proposed change <b>gives more flexibility to services</b>	<div style="display: flex; align-items: center;"> <div style="width: 41%; background-color: #008080; color: white; text-align: center; padding: 5px;">41%</div> <div style="width: 3%; background-color: #00B050; color: white; text-align: center; padding: 5px;">44%</div> <div style="width: 13%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">13%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=54 (49%)
The proposed change <b>reduces unnecessary compliance burden</b>	<div style="display: flex; align-items: center;"> <div style="width: 43%; background-color: #008080; color: white; text-align: center; padding: 5px;">43%</div> <div style="width: 6%; background-color: #00B050; color: white; text-align: center; padding: 5px;">37%</div> <div style="width: 13%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">13%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">7%</div> </div>	n=54 (49%)
The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; align-items: center;"> <div style="width: 36%; background-color: #008080; color: white; text-align: center; padding: 5px;">36%</div> <div style="width: 15%; background-color: #00B050; color: white; text-align: center; padding: 5px;">51%</div> <div style="width: 11%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">11%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=53 (48%)

HOME-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.3.6: Amendment to HS13

Clarifies animal handling practices.

The proposed change <b>reduces unnecessary compliance burden</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 33%; background-color: #008080; color: white; text-align: center; padding: 5px;">33%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">45%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">18%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">4%</div> </div>	n=51 (46%)
The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 43%; background-color: #008080; color: white; text-align: center; padding: 5px;">43%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">51%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">4%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=51 (46%)
The proposed change <b>improves health and safety</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 44%; background-color: #008080; color: white; text-align: center; padding: 5px;">44%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">52%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">4%</div> </div>	n=52 (47%)

### 3.3.7: Amendment to HS14

Clarifies practices and documentation required for excursions.

The proposed change <b>meets the needs of parents and whānau</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 22%; background-color: #008080; color: white; text-align: center; padding: 5px;">22%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">69%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">8%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=51 (46%)
The proposed change <b>reduces unnecessary compliance burden</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 19%; background-color: #008080; color: white; text-align: center; padding: 5px;">19%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">38%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">31%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">12%</div> </div>	n=52 (47%)
The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 20%; background-color: #008080; color: white; text-align: center; padding: 5px;">20%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">44%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">26%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">10%</div> </div>	n=50 (45%)

### 3.3.8: Amendment to merge HS16 with HS18

Merges food and drinking water requirements.

The proposed change <b>reduces unnecessary compliance burden</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 25%; background-color: #008080; color: white; text-align: center; padding: 5px;">25%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">56%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">15%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">4%</div> </div>	n=48 (44%)
The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 29%; background-color: #008080; color: white; text-align: center; padding: 5px;">29%</div> <div style="width: 12%; background-color: #00B050; color: white; text-align: center; padding: 5px;">58%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">10%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=48 (44%)

HOME-BASED

Strongly agree Agree Disagree Strongly disagree

### 3.3.9: Amendment to HS19

Clarifies supervision while eating requirements and supports flexibility in how minimising food related choking guidance is shared with parents.

The proposed change <b>reduces unnecessary compliance burden</b>	40%	40%	19%		n=47 (43%)
The proposed change makes it <b>easier to understand requirements</b>	40%	51%	9%		n=47 (43%)
The proposed change <b>supports health and safety</b>	42%	52%	4%	2%	n=48 (44%)

### 3.3.10: Amendment to HS21

Allows for brief room temperature fluctuations.

The proposed change <b>reduces unnecessary compliance burden</b>	40%	40%	18%	2%	n=50 (45%)
The proposed change makes it <b>easier to understand requirements</b>	41%	43%	14%	2%	n=49 (45%)
The proposed change <b>supports health and safety</b>	40%	46%	14%		n=50 (45%)

### 3.3.11: Amendment to HS22

Allows for qualified midwives in accepted first-aid qualifications.

The proposed change <b>reduces unnecessary compliance burden</b>	22%	54%	15%	9%	n=46 (42%)
The proposed change <b>meets the needs of parents and whānau</b>	21%	67%	8%	4%	n=48 (44%)
The proposed change <b>supports health and safety</b>	21%	67%	6%	6%	n=48 (44%)

Strongly agree Agree Disagree Strongly disagree

### 3.3.12 Amendment to HS25 and Appendix 2

Clarifies requirements related to storing and administering medicine.

The proposed change <b>reduces unnecessary compliance burden</b>		n=48 (44%)
The proposed change makes it <b>easier to understand requirements</b>		n=44 (40%)
The proposed change <b>supports health and safety</b>		n=44 (40%)

### 3.3.13: Amendment to HS26

Clarifies information and training requirements for administering medicine.

The proposed change <b>meets the needs of parents and whānau</b>		n=47 (43%)
The proposed change makes it <b>easier to understand requirements</b>		n=46 (42%)
The proposed change <b>supports health and safety</b>		n=48 (44%)

### 3.3.14: Amendment to HS28

Clarifies and strengthens child protection policy review requirements.

The proposed change <b>meets the needs of parents and whānau</b>		n=44 (40%)
The proposed change makes it <b>easier to understand requirements</b>		n=45 (41%)
The proposed change <b>supports health and safety</b>		n=45 (41%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.3.15: Amendment to HS33

Clarifies incident notification requirements.

The proposed change meets the needs of parents and whānau	<div style="display: flex; justify-content: space-between;"> <div style="width: 33%; background-color: #008080; color: white; text-align: center; padding: 5px;">33%</div> <div style="width: 27%; background-color: #00B050; color: white; text-align: center; padding: 5px;">60%</div> <div style="width: 11%; background-color: #E53935; color: white; text-align: center; padding: 5px;">7%</div> </div>	n=43 (39%)
The proposed change makes it easier to understand requirements	<div style="display: flex; justify-content: space-between;"> <div style="width: 36%; background-color: #008080; color: white; text-align: center; padding: 5px;">36%</div> <div style="width: 19%; background-color: #00B050; color: white; text-align: center; padding: 5px;">55%</div> <div style="width: 11%; background-color: #E53935; color: white; text-align: center; padding: 5px;">7%</div> <div style="width: 34%; background-color: #C0392B; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=44 (40%)
The proposed change supports health and safety	<div style="display: flex; justify-content: space-between;"> <div style="width: 38%; background-color: #008080; color: white; text-align: center; padding: 5px;">38%</div> <div style="width: 13%; background-color: #00B050; color: white; text-align: center; padding: 5px;">51%</div> <div style="width: 49%; background-color: #E53935; color: white; text-align: center; padding: 5px;">11%</div> </div>	n=45 (41%)

### 3.4.1: Amendment to merge PF1 with PF2

Merges design and layout requirements with supervision.

The proposed change makes it easier to understand requirements	<div style="display: flex; justify-content: space-between;"> <div style="width: 30%; background-color: #008080; color: white; text-align: center; padding: 5px;">30%</div> <div style="width: 29%; background-color: #00B050; color: white; text-align: center; padding: 5px;">59%</div> <div style="width: 41%; background-color: #E53935; color: white; text-align: center; padding: 5px;">11%</div> </div>	n=46 (42%)
The proposed change doesn't increase unnecessary compliance burden for services	<div style="display: flex; justify-content: space-between;"> <div style="width: 35%; background-color: #008080; color: white; text-align: center; padding: 5px;">35%</div> <div style="width: 17%; background-color: #00B050; color: white; text-align: center; padding: 5px;">52%</div> <div style="width: 48%; background-color: #E53935; color: white; text-align: center; padding: 5px;">13%</div> </div>	n=46 (42%)
The proposed change supports learning and play	<div style="display: flex; justify-content: space-between;"> <div style="width: 35%; background-color: #008080; color: white; text-align: center; padding: 5px;">35%</div> <div style="width: 26%; background-color: #00B050; color: white; text-align: center; padding: 5px;">61%</div> <div style="width: 39%; background-color: #E53935; color: white; text-align: center; padding: 5px;">4%</div> </div>	n=46 (42%)

### 3.4.2: Amendment to PF4

Clarifies requirements for appropriate equipment, furnishings, and materials provided for activities.

The proposed change makes it easier to understand requirements	<div style="display: flex; justify-content: space-between;"> <div style="width: 36%; background-color: #008080; color: white; text-align: center; padding: 5px;">36%</div> <div style="width: 22%; background-color: #00B050; color: white; text-align: center; padding: 5px;">58%</div> <div style="width: 11%; background-color: #E53935; color: white; text-align: center; padding: 5px;">4%</div> <div style="width: 31%; background-color: #C0392B; color: white; text-align: center; padding: 5px;">2%</div> </div>	n=45 (41%)
The proposed change doesn't increase unnecessary compliance burden for services	<div style="display: flex; justify-content: space-between;"> <div style="width: 33%; background-color: #008080; color: white; text-align: center; padding: 5px;">33%</div> <div style="width: 29%; background-color: #00B050; color: white; text-align: center; padding: 5px;">62%</div> <div style="width: 38%; background-color: #E53935; color: white; text-align: center; padding: 5px;">4%</div> </div>	n=45 (41%)
The proposed change supports learning and play	<div style="display: flex; justify-content: space-between;"> <div style="width: 49%; background-color: #008080; color: white; text-align: center; padding: 5px;">49%</div> <div style="width: 2%; background-color: #00B050; color: white; text-align: center; padding: 5px;">51%</div> </div>	n=45 (41%)

HOME-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.4.3: Amendment to PF5

Clarifies that safe spaces for infants can include older children.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; align-items: center;"> <div style="width: 31%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 67%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 2%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 2%; background-color: #C00000;"></div> </div>	n=45 (41%)
The proposed change <b>doesn't increase unnecessary compliance burden for services</b>	<div style="display: flex; align-items: center;"> <div style="width: 31%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 67%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 2%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 2%; background-color: #C00000;"></div> </div>	n=45 (41%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; align-items: center;"> <div style="width: 29%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 69%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 2%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 2%; background-color: #C00000;"></div> </div>	n=45 (41%)

### 3.4.4: Amendment to PF10

Removes reference to a specific temperature, instead focuses on having a safe and effective way of maintaining a comfortable room temperature.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; align-items: center;"> <div style="width: 20%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 55%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 18%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 7%; background-color: #C00000;"></div> </div>	n=44 (40%)
The proposed change <b>reduces duplication</b>	<div style="display: flex; align-items: center;"> <div style="width: 20%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 53%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 22%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 4%; background-color: #C00000;"></div> </div>	n=45 (41%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; align-items: center;"> <div style="width: 25%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 50%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 18%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 7%; background-color: #C00000;"></div> </div>	n=44 (40%)

### 3.4.5: Amendment to merge HS17 with PF13

Merges criteria and sets fridge temperature at 5-degrees.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; align-items: center;"> <div style="width: 33%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 60%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 7%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 0%; background-color: #C00000;"></div> </div>	n=42 (38%)
The proposed change <b>reduces duplication</b>	<div style="display: flex; align-items: center;"> <div style="width: 31%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 64%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 5%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 0%; background-color: #C00000;"></div> </div>	n=42 (38%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; align-items: center;"> <div style="width: 33%; background-color: #008080; margin-right: 2px;"></div> <div style="width: 56%; background-color: #00B050; margin-right: 2px;"></div> <div style="width: 12%; background-color: #E57373; margin-right: 2px;"></div> <div style="width: 0%; background-color: #C00000;"></div> </div>	n=43 (39%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.4.5: Removal of Appendix 1 to PF15

Removes reference to Appendix 1 and requires services to regularly check and restock first aid kits.

The proposed change makes it <b>easier to understand requirements</b>		n=43 (39%)
The proposed change <b>educes duplication</b>		n=43 (39%)
The proposed change <b>supports health and safety</b>		n=43 (39%)

### 3.4.6: Amendment to merge PF20 with HS9

Merges the furniture and space requirements, for children under two, sleep into one criterion.

The proposed change makes it <b>easier to understand requirements</b>		n=41 (37%)
The proposed change <b>reduces duplication</b>		n=42 (38%)
The proposed change <b>supports health and safety</b>		n=42 (38%)

### 3.4.7: Amendment to merge PF21 with PF22

Clarifies bedding and mattress hygiene.

The proposed change makes it <b>easier to understand requirements</b>		n=41 (37%)
The proposed change <b>reduces duplication</b>		n=42 (38%)
The proposed change <b>supports health and safety</b>		n=42 (38%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.5.1: Amendment to merge GMA1 with GMA2

Merges requirements for how information is shared with parents and whānau into one criterion.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 21%; background-color: #008080; color: white; text-align: center; padding: 5px;">21%</div> <div style="width: 25%; background-color: #00B050; color: white; text-align: center; padding: 5px;">46%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">18%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">15%</div> </div>	n=39 (35%)
The proposed change <b>provides services greater flexibility</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 23%; background-color: #008080; color: white; text-align: center; padding: 5px;">23%</div> <div style="width: 15%; background-color: #00B050; color: white; text-align: center; padding: 5px;">38%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">23%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">15%</div> </div>	n=39 (35%)
The proposed change <b>supports the needs of parents and whānau</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 18%; background-color: #008080; color: white; text-align: center; padding: 5px;">18%</div> <div style="width: 40%; background-color: #00B050; color: white; text-align: center; padding: 5px;">58%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">16%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">9%</div> </div>	n=38 (35%)

### 3.5.2: Amendment to GMA3

Allows services to provide digital evidence of parent involvement.

The proposed change <b>provides services greater flexibility</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 33%; background-color: #008080; color: white; text-align: center; padding: 5px;">33%</div> <div style="width: 22%; background-color: #00B050; color: white; text-align: center; padding: 5px;">55%</div> <div style="width: 10%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">10%</div> <div style="width: 10%; background-color: #D93025; color: white; text-align: center; padding: 5px;">3%</div> </div>	n=40 (36%)
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### 3.5.3: Removal of GMA4

Removes criterion to have a philosophy statement.

The proposed change <b>reduces unnecessary compliance burden for services</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 26%; background-color: #008080; color: white; text-align: center; padding: 5px;">26%</div> <div style="width: 13%; background-color: #00B050; color: white; text-align: center; padding: 5px;">29%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">18%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">26%</div> </div>	n=38 (35%)
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### 3.5.4: Amendment to GMA5

Clarifies what review processes are required for a service's operations.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-between;"> <div style="width: 37%; background-color: #008080; color: white; text-align: center; padding: 5px;">37%</div> <div style="width: 18%; background-color: #00B050; color: white; text-align: center; padding: 5px;">55%</div> <div style="width: 12%; background-color: #E91E63; color: white; text-align: center; padding: 5px;">5%</div> <div style="width: 12%; background-color: #D93025; color: white; text-align: center; padding: 5px;">3%</div> </div>	n=38 (35%)
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■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.5.5: Removal of GMA6

Removes criterion for HR management.

The proposed change **reduces unnecessary compliance burden for services**



n=36  
(33%)

### 3.5.6: Amendment to GMA7

Removes the annual planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant does not hold a current licence.

The proposed change makes it **easier to understand requirements for new services**



n=37  
(34%)

The proposed change **reduces unnecessary compliance burden for existing services**



n=37  
(34%)

### 3.5.7: Amendment to GMA8

Removes the annual budget planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant or does not hold a current licence.

The proposed change makes it **easier to understand requirements for new services**



n=35  
(32%)

The proposed change **reduces unnecessary compliance burden for existing services**



n=35  
(32%)

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 3.5.9: Amendment to merge GMA9 with GMA10

Merges requirements for maintaining enrolment and attendance records.

The proposed change makes it **easier to understand requirements**



n=36  
(33%)

The proposed change **reduces unnecessary compliance burden for services**



n=36  
(33%)

## Qualitative feedback on specific amendments

As part of the survey 20 respondents provided additional feedback on one or more amendment.

### 3.3.2: Amendment to HS2

**Removes documentation requirement while maintaining the requirement for hygienic laundry practices.**

n=4

Feedback noted concerns about removing specific procedural requirements while maintaining hygiene expectations. It was suggested that, if HS2 were amended, the Ministry should provide guidance around procedures to support services in implementing effective hygiene practices.

### 3.3.5: Amendment to HS7

**Allows for less frequent emergency drills, from three to four months.**

n=5

There was strong opposition to extending emergency drill frequency from three to four months, with most respondents citing health and safety concerns.

### 3.3.7: Amendment to HS14

**Clarifies practices and documentation required for excursions.**

n=3

Some respondents were concerned about increased complexity or a lack of clarity in proposed excursion documentation requirements. They suggested that clear guidance would help services to comply while continuing to prioritise the safety and informed consent of whānau.

### 3.3.8: Amendment to merge HS16 with HS18

#### **Merges food and drinking water requirements.**

**n=2**

Both respondents questioned subjective terms such as “close proximity” and “record of food”.

### 3.3.10: Amendment to HS21

#### **Allows for brief room temperature fluctuations.**

**n=21**

Most of the respondents reported significant concerns related to the proposed language “brief periods” and “fluctuating temperatures”. It was frequently argued that this could lead to negative health and safety outcomes for children.

### 3.3.11: Amendment to HS22

#### **Allows for qualified midwives in accepted first-aid qualifications.**

**n=5**

Most of the five respondents supported recognising midwives as qualified first-aid providers. Some emphasised broader systemic issues with access to training and argued that this amendment could have gone further to address key challenges for home-based and rural services.

### 3.3.12: Amendment to HS25

#### **Clarifies requirements related to storing and administering medicine.**

**n=2**

Both respondents reported safety concerns about proposed medication administration changes, particularly regarding the frequency of parental acknowledgement.

### 3.3.13: Amendment to HS26

#### **Clarifies information and training requirements for administering medicine.**

**n=2**

Both respondents raised concerns about barriers to accessing necessary first aid training provisions and expressed that these barriers particularly affected home-based and rural services.

### 3.3.14: Amendment to HS28

#### **Clarifies and strengthens child protection policy review requirements.**

**n=4**

Respondents noted concern with the lack of clarity around hypothetical scenario evaluation. Some suggested the Ministry provide guidance and resources to help services meet requirements.

### 3.4.2: Amendment to PF4

**Clarifies requirements for appropriate equipment, furnishings, and materials provided for activities.** n=3

The three respondents critiqued the use of the phrase “timely access” as being too vague. Practical constraints specific to home-based services were noted, where providers may not have the range of resources available in their home to cater to children’s learning and abilities.

### 3.4.4: Amendment to PF10

**Removes reference to a specific temperature, instead focuses on having a safe and effective way of maintaining a comfortable room temperature.** n=6

Most of the six respondents had concerns with proposed terms and more prescriptive language was requested. Some respondents suggested including a specific range of appropriate temperatures (i.e. 16°-18°C) to alleviate this issue.

### 3.4.5: Removal of Appendix 1 to PF15

**Removes reference to Appendix 1 and requires services to regularly check and restock first aid kits.** n=4

Most of the four respondents were against the removal of the first-aid appendix, expressing concern that removal would create inconsistency and confusion about required contents. It was suggested that there needs to be minimum required contents, or the change “risks variation across providers and uncertainty about what is deemed acceptable”.

### 3.5.1: Amendment to merge GMA1 with GMA2

**Merges requirements for how information is shared with parents and whānau criterion.** n=5

Most of the five respondents opposed the reduction in display requirements, highlighting their contributions to services’ transparency for parents and whānau. Most suggested that the current criterion “didn’t create an unreasonable workload or confusion,” and saw it as an indication of a professional, well-regulated sector.

### 3.5.2: Amendment to GMA3

**Allows services to provide digital evidence of parent involvement.** n=2

Both respondents supported the proposed change, suggesting that modernising administrative processes could improve efficiency without compromising safety or transparency.

### 3.5.3: Amendment to GMA4

#### **Removes criterion to have a philosophy statement.**

**n=19**

Most feedback opposed the removal, emphasising the importance of philosophy statements in guiding service operations not a burden on services, and that it was critical to maintaining accountability and giving families and employees meaningful choices between different services. Some respondents were in favour of the removal, viewing philosophy as being embedded in practice rather than documentation.

### 3.5.4: Amendment to GMA5

#### **Clarifies what review processes are required for a service's operations.**

**n=5**

Respondents noted that the proposed wording could be clearer.

### 3.5.5: Removal of GMA6

#### **Removes criterion for HR management.**

**n=10**

Most feedback opposed the removal of GMA6, and did not view the criteria as burdensome. It was widely seen as providing essential protections for staff and fundamental to maintaining professional standards across home-based services.

A range of respondents questioned the impact this change would have on effective accountability mechanisms and directly linked GMA6 to service quality and child learning outcomes.

Some respondents supported the removal, suggesting that employment law provides adequate coverage and therefore does not require sector-specific regulation. Among those respondents, it was suggested that the removal worked for home-based settings due to the higher likelihood that staff worked as contractors rather than employees, which creates different obligations and support needs.

### 3.5.7: Amendment to GMA8

#### **Removes the annual budget planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant or does not hold a current licence.**

**n=9**

Most respondents opposed limiting planning and budgeting requirements to new or provisional services only, emphasising the importance of transparency and accountability for all services receiving public funding, regardless of their licensing history. Some respondents mentioned the importance of that documentation for staff, and suggested clear requirements for services with provisional licences was necessary.

A minority supported the changes, suggesting that parents and whānau didn't need to know details about the service at the current level required.

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# Hospital-based survey analysis

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# Hospital-based survey analysis

## Amendment breakdown

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 4.3.1: Amendment to HS5

Clarifies safe and hygienic animal handling practices.

The proposed change makes it <b>easier to understand requirements</b>	<b>100%</b>	n=2 (20%)
The proposed change <b>supports the needs of parents and whānau</b>	<b>100%</b>	n=2 (20%)
The proposed change <b>reduces unnecessary compliance burden</b>	<b>100%</b>	n=2 (20%)

### 4.3.2: Amendment to HS6

Clarifies practices and documentation required for excursions.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-around;"> <div style="width: 50%; text-align: center;"><b>50%</b></div> <div style="width: 50%; text-align: center;"><b>50%</b></div> </div>	n=2 (20%)
The proposed change <b>meets the intent of the original criterion</b>	<b>100%</b>	n=2 (20%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; justify-content: space-around;"> <div style="width: 50%; text-align: center;"><b>50%</b></div> <div style="width: 50%; text-align: center;"><b>50%</b></div> </div>	n=2 (20%)

HOSPITAL-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

### 4.3.3: Amendment to HS8

Allows for brief room temperature fluctuations.

The proposed change makes it <b>easier to understand requirements</b>	<div style="display: flex; justify-content: space-around;"> <div style="width: 50%; background-color: #FF6347; text-align: center; color: white;">50%</div> <div style="width: 50%; background-color: #FF0000; text-align: center; color: white;">50%</div> </div>	n=2 (20%)
The proposed change <b>supports health and safety</b>	<div style="display: flex; justify-content: space-around;"> <div style="width: 50%; background-color: #FF6347; text-align: center; color: white;">50%</div> <div style="width: 50%; background-color: #FF0000; text-align: center; color: white;">50%</div> </div>	n=2 (20%)
The proposed change <b>makes it easier for services to meet compliance</b>	<div style="display: flex; justify-content: space-around;"> <div style="width: 50%; background-color: #90EE90; text-align: center; color: white;">50%</div> <div style="width: 50%; background-color: #FF0000; text-align: center; color: white;">50%</div> </div>	n=2 (20%)

### 4.3.4: Amendment to include HS10 in HS9

Merges securing furniture and hazard and risk management.

The proposed change <b>reduces duplication</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)
The proposed change <b>supports health and safety</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)
The proposed change <b>meets the intent of the original criterion</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)

### 4.3.5: Amendment to HS13

Clarifies and strengthens child protection policy review requirements.

The proposed change <b>supports the needs of parents and whānau</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)
The proposed change makes it <b>easier to understand requirements</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)
The proposed change <b>supports health and safety</b>	<div style="width: 100%; background-color: #90EE90; text-align: center; color: white;">100%</div>	n=2 (20%)

HOSPITAL-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

#### 4.4.1: Amendment to PF2

Clarifies requirements for appropriate equipment, furnishings, and materials provided.

The proposed change <b>doesn't increase unnecessary compliance burden for services</b>	<b>100%</b>	n=3 (30%)
The proposed change makes it <b>easier to understand requirements</b>	<b>100%</b>	n=3 (30%)
The proposed change <b>supports learning and play</b>	<b>100%</b>	n=3 (30%)

#### 4.4.2: Amendment to PF5

Clarifies requirements for adult workspaces to exclude children.

The proposed change makes it <b>easier to understand requirements</b>	<b>100%</b>	n=3 (30%)
The proposed change <b>doesn't increase unnecessary compliance burden for services</b>	<b>100%</b>	n=3 (30%)
The proposed change <b>should be easy for services to implement</b>	<b>100%</b>	n=3 (30%)

#### 4.4.3: Amendment to include PF7 in PF8

Brings together design and layout requirements with support for effective supervision.

The proposed change makes it <b>easier to understand requirements</b>	<b>100%</b>	n=3 (30%)
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■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

#### 4.4.4: Amendment to PF9

Clarifies that safe spaces for infants can include older children.

The proposed change makes it <b>easier to understand requirements</b>	 100%	n=3 (30%)
The proposed change <b>supports health and safety</b>	 100%	n=3 (30%)

#### 4.5.1: Amendment to GMA1

Clarifies and reduces requirements for services to display information to parents and whānau.

The proposed change makes it <b>easier to understand requirements</b>	 100%	n=2 (20%)
The proposed change <b>supports the needs of parents and whānau</b>	 100%	n=2 (20%)

#### 4.5.2: Amendment to GMA2

Removes some requirements to display information to parents and whānau.

The proposed change makes it <b>easier to understand requirements</b>	 100%	n=2 (20%)
The proposed change <b>supports the needs of parents and whānau</b>	 100%	n=2 (20%)

#### 4.5.2: Amendment to include GMA4 in GMA3

Merges requirements for how information is shared with parents and whānau.

The proposed change <b>reduces duplication</b>	 100%	n=2 (20%)
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HOSPITAL-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

#### 4.5.3: Removal of GMA5

Removes the requirement to provide a philosophy statement.

The proposed removal **reduces unnecessary compliance burden**



n=2  
(20%)

#### 4.5.4: Amendment to GMA6

Clarifies requirements for self-review and internal evaluations.

The proposed change makes it **easier to understand requirements**



n=2  
(20%)

#### 4.5.5: Removal of GMA7

Removes the requirement to implement human resources management practices.

The proposed removal **reduces unnecessary compliance burden**



n=2  
(20%)

#### 4.5.6: Amendment to GMA8

Removes the annual planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant does not hold a current licence.

The proposed change makes it **easier to understand requirements for new services**



n=2  
(20%)

The proposed removal **reduces unnecessary compliance burden for existing services**



n=2  
(20%)

HOSPITAL-BASED

■ Strongly agree 
 ■ Agree 
 ■ Disagree 
 ■ Strongly disagree

#### 4.5.7: Amendment to GMA9

Removes the annual budget planning criterion for most services. It applies only to probationary applications and licence amendments where the applicant or does not hold a current licence.

The proposed change makes it **easier to understand requirements for new services**



n=2  
(20%)

The proposed removal **reduces unnecessary compliance burden for existing services**



n=2  
(20%)

#### 4.5.10: Amendment to include GMA11 in GMA10

Clairifies participation recording requirements.

The proposed change makes it **easier to understand requirements**



n=2  
(20%)

The proposed change **doesn't increase compliance burden for services**



n=2  
(20%)

## Qualitative survey feedback on specific amendments

As part of the survey two respondents provided additional information on specific proposed amendments.

### 4.3.3: Amendment to HS8

**Allows for brief room temperature fluctuations.**

**n=2**

Both respondents noted the subjective language and the effect this would have on consistency across services.

### 4.5.3 Removal of GMA5

**Removes the requirement to provide a philosophy statement.**

**n=2**

Both respondents showed support for required philosophy statements.

### 4.5.5 Removal of GM7

**Removes the requirement to implement human resources management practices. n=2**

Both respondents supported the removal, suggesting that those practices were already addressed under employment law and the teacher registration process.



# Submissions



# Qualitative analysis of submissions

## Submission analysis overview

Overall, there were 97 submissions received separate to the survey. Twenty were from groups and the remaining 77 were from individuals. Some of these groups represented large service providers and organisations. A majority of email submissions opposed the proposed regulatory changes.

Approximately 89 percent of respondents expressed 'very negative' sentiment towards the proposals, with a further eight percent of feedback classified as 'generally negative'. The remaining submissions were classed 'generally positive', acknowledging some potential benefits of regulatory streamlining while expressing reservations about implementation details.

Submissions showed a deep engagement with the consultation, often including personal and professional anecdotes to support their views. While sentiment was consistent, feedback was generally focused on different key areas for each stakeholder group. Teachers emphasised professional identity and quality concerns, while parents and whānau prioritised safety and engagement issues.

## Qualitative analysis of submissions on specific amendments

### Amendment to HS8

Allows for less frequent emergency drills, from three to four months.

Some submissions opposed reducing the frequency of fire and earthquake drills.

**Amendment to HS9**

Clarifies requirements and extends the sleep monitoring interval from 5-10 to 10-15 minutes.

Most submissions insisted that extending checks to 10–15 minutes “increases the risk to child safety,” calling instead for tighter intervals and in-person assessments of warmth and breathing.

**Amendment to HS22**

Clarifies supervision while eating requirements and supports flexibility in how food related choking guidance is shared with parents.

Many submissions noted the importance of staff being first aid trained and of the staff member being seated at the table.

**HS34**

Clarifies and strengthens child protection policy review requirements.

HS34 was not included in the survey for centre-based services however feedback was provided in the long-form questions in the survey and through submissions. Respondents generally supported the intent of the proposed amendment to HS34, recognising the importance of clear and consistent processes for reporting serious incidents involving children. Most respondents agreed that requiring the Ministry of Education to be notified at the same time as other agencies would strengthen oversight of child safety, and child protection. Some respondents sought clearer guidance on scope of incidents, guidance around timeframes and terminology used in the criterion, privacy protections, and the Ministry’s role once notified.

Some respondents supported the criterion amendment for its intent to strengthen child-safety and protection reporting and clarify expectations for services. Some respondents agreed that simultaneous notification of the Ministry and specified agencies would enhance oversight and promote consistent practice.

**Amendments to GMA1-4**

Relates to information sharing and display requirements for parents and whānau.

Some submissions expressed concern about the negative impact these proposals might have on engagement between services and families. It was suggested that changes would impact culturally responsive practice and relationship building, which are fundamental to quality practice.

**Amendment to GMA5**

Removes criterion to have a philosophy statement.

Submissions generally opposed removing philosophy statement requirements, stating negative impacts on service direction and family choice. The requirement was seen as critical to helping parents and whānau understand services' beliefs and values.

**Removal of GMA7**

Removes criterion for HR management.

Submissions expressed concerns about removing HR management requirements, reporting potential impacts on employment law compliance and staff wellbeing.

**Amendments to GMA 8-10**

Relates to planning, budgeting, and administrative requirements.

Submissions noted the importance of transparency and high professional standards.

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## Key themes from submissions

Several key themes were identified across the submissions received:

**Health and safety**

Health and safety changes generated the most negative sentiment. This feedback generally related to environment-based amendments related to temperature, space, sleeping, or supervision changes those respondents often felt would negatively impact services' standards of care.

**Language and terminology**

Many submissions reported that broad or ambiguous wording in proposed changes eroded regulatory clarity. It was frequently noted that vague or subjective language choices like "suitable" or "comfortable" would increase inconsistency, lower delivery quality, and lead to costly interpretations. Some submissions noted that the discussion document's frequent use of terms such as "early learning service" which are not grounded in legislation caused confusion and misunderstanding.

## Learning outcomes

Many submissions linked proposed changes to negative learning outcomes for children, arguing that planning, and philosophy requirements are fundamental to a high standard of service delivery. Other respondents felt that learning outcomes were not a primary focus of the proposed changes, which did not support high quality service delivery. It was noted that the changes might harm curriculum implementation and negatively affect New Zealand's early childhood reputation.

## Consultation and implementation

Many submissions raised concerns with the way the consultation has been conducted and the way changes would be implemented going forward. Some stakeholders felt that they had not had “meaningful impact” into the proposal, which they expressed undermined trust and the risk of culturally inappropriate solutions. Others felt the changes lacked risk-based analysis, and advocated for pilot testing, child-centred frameworks, and the establishment of Māori & Pasifika advisory groups before enacting changes.

Several respondents questioned the logic of beginning consultation on these changes prior to foundational reforms recommended by the Ministry for Regulation, including defining clear outcomes and clarifying the roles of regulatory bodies. They reported that progressing Recommendation 9 in isolation contradicted the reform sequence agreed to by Cabinet.

A range of suggestions were made around ways to increase the effectiveness of implementation, so that services could confidently make changes to their practice. Respondents advocated for regional training workshops to help staff understand the final amendments, provide exemplars, and answer questions. They also asked for comprehensive resources and guidance to support implementation. Feedback also noted the challenges of implementing changes to the learning space – especially for those operating in heritage or space-constrained buildings. Any costly renovations could drive well-established services to close rather than retrofit, reducing sector capacity and choice for families. It was also noted that this disproportionately burdened existing services.

To alleviate these risks, a range of respondents suggested a phased rollout including pilot testing, co-design with the sector, and the development of resources and guidance to support implementation. They also called for transition arrangements which would exempt currently compliant services from changes to structural requirements (such as new partition heights or lighting upgrades) for a limited transition period. Submissions noted that these allowances would help high-quality services to maintain operations while working toward full compliance.



**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

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He mea tārai e mātou te mātauranga  
kia rangatira ai, kia mana taurite ai ōna huanga.

We shape an education system that delivers  
equitable and excellent outcomes.

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