



中華人民共和國香港特別行政區政府總部教育局  
Education Bureau

Government Secretariat, The Government of the Hong Kong Special Administrative Region  
The People's Republic of China

香港添馬添美道2號政府總部東翼5樓506室特殊教育及幼稚園教育分部  
Special Education and Kindergarten Education Division, Room 506, 5/F, East Wing, Central Government Offices, 2 Tim Mei Avenue, Tamar, Hong Kong

本局檔號 Our Ref: EDB(KGSD2)/16-1/5  
來函檔號 Your Ref:

電話 Telephone: 3509 8520  
傳真 Fax Line: 2119 9061

3 November 2015

Miss Polly YEUNG  
Clerk to Panel  
Legislative Council Panel on Education  
Legislative Council Complex  
1 Legislative Council Road  
Central  
Hong Kong

Dear Miss Yeung

**Panel on Education**

**Subcommittee to Study the Implementation of  
Free Kindergarten Education**

I refer to your letters dated 16 September 2015 and 27 October 2015 requesting the Administration to provide a written response to deputations' views received at the Subcommittee meeting held on 4 July 2015. Our response is at the **Annex** for Members' reference.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Hera'.

(Ms Hera CHUM)  
for Secretary for Education

Encl.

**Legislative Council Panel on Education  
Subcommittee to Study  
the Implementation of Free Kindergarten Education**

**Response to  
deputations' views and concerns raised at  
the meeting on 4 July 2015**

Regarding the issues and concerns raised by the deputations in the Subcommittee's meeting on 4 July 2015, responses of the Education Bureau (EDB) are set out below.

**Scope of free Kindergarten (KG) education**

2. The contributions of half-day (HD), whole-day (WD) and long WD (LWD) KGs in providing education and care services for KG students are fully recognised. To formulate the new KG education policy, including the scope of service to be subsidised, we have to take into account, among others, the impact of the duration of the programmes on the developmental and learning outcomes of the children. In this regard, we note that a number of studies have been carried out in different parts of the world, and existing evidence precludes drawing conclusions that WD programmes are more favourable to young children than HD programmes. Studies also show that family education plays a crucial and complementary role in shaping young children. A HD programme can achieve the requirements of the curriculum and it would allow relatively more family time for young children to play and interact with their family in a less-structured and more relaxing setting so as to nurture their bonding and sense of security, which are important for their healthy development. Overseas practices have been studied and it is noted that although many countries offer WD services for parents as an option, it is not a common practice internationally to provide free WD KG services for all children from three to six years of age.

3. Having considered the developmental needs of children and overseas practices, the Committee on Free KG Education (the Committee) recommended and we agree that the Government subsidy under the new

policy should cover HD service as the basic provision for all eligible children aged 3 to 6. To tie in with the population policy to release more women back to the workforce, additional resources should be provided for KGs offering WD or LWD services to encourage them to provide more such services. That notwithstanding, the provision of WD and LWD services should be on a co-payment basis. As for the subsidy level, it is noted that under the current Pre-primary Education Voucher Scheme (PEVS), the level of tuition fees of WD KG services has been about 50% to 60% higher than that of HD KG services. Premised on the principle that parents should bear part of the cost of WD service, the Committee proposed and we agree that the level of additional subsidy for WD KG be 25% to 30% of the basic funding for HD services. For LWD KGs, the Committee further proposed an additional grant to enable the LWD KG to employ one to three headcounts, having regard to the estimated manpower required for maintaining service for the longer operating hours and more operating days. We will study the implication of this proposal and will further deliberate on the subsidy levels for WD and LWD KGs, taking into consideration various factors including the principle of co-payment by parents and the Government for the WD /LWD services, the financial implications to the Government, etc. In any case, with additional resources provided and more such services operated, we anticipate that WD and LWD KGs would be more accessible to parents and at a more affordable cost.

4. As regards eligibility of KGs to be covered by the new policy, the Committee proposed that whilst all KGs are eligible and welcomed to join, such KGs should, among other criteria, be non-profit-making (NPM), offering a local curriculum that conforms with the KG curriculum guidelines published by the EDB and having proven track records on providing quality KG education. We consider this in line with the existing practice and policy of the Government. As the study undertaken by the Committee and its recommendations are about KG education in the context of 15-year free education, pre-nursery services are outside its ambit.

5. We note the concern that under the future policy, some students attending NPM KGs will still need to pay school fee. In this regard, we will provide financial assistance for children from needy families having regard to the recommendations of the Committee in this respect, to ensure

that no children will be deprived of the opportunity to receive KG education due to lack of means.

## **Funding arrangements**

### Mode of funding

6. It is widely accepted by the KG sector that in formulating the funding mode for the new policy, the diversity, vibrancy and uniqueness of the KG sector should be maintained. With this in mind, the Committee has considered whether the future subsidy should be in the form of voucher as is the case for PEVS, or of providing funding for KG operators, or a combination of both. In this regard, we are aware that the KG sector had concern that PEVS had resulted in unhealthy competition among KG operators and could not fully address the needs of KGs of different operation modes. The Committee has also considered the pros and cons of adopting the subvention mode for aided schools and Direct Subsidy Scheme schools, as well as the Lump Sum Grant (LSG) approach. Based on the detailed analysis of the different funding modes, and in the light of the complexity and diversity in KG operation as manifested in KGs offering HD, WD, LWD services and/or a mix of different types of services, the Committee recommended and we agree that a more flexible mode should be adopted under the new policy, whereby funding for individual KGs would be provided direct to eligible KGs, partly on a per student basis (i.e. unit cost approach) and partly on a school-specific basis to cater for the special circumstances of the KGs or the students.

### Issues related to LSG

7. We note some deputations' view that the Government should provide full reimbursement to KGs for expenses on teachers' salary, which is an essential feature in the aided school subvention mode. In this regard, we agree with the Committee that the aided school subvention mode would not be conducive to maintaining the diversity, vibrancy and uniqueness of the KG sector. Specifically, the stringent control measures of the aided school mode, such as centralised student placement system, approval of class structure and setting of class threshold, may result in packing of classes and redundant teachers in KGs in times of enrolment drop. Also, KGs would become less flexible in operating HD and WD classes to meet the needs of parents. In short, if the aided

school subvention mode is adopted in the KG sector, the sector's overall operating flexibility to cope with the rise and fall of the student population in different districts would be affected, and the existing diversified choices available to parents that are not bound by district or school net would be upset.

8. We understand the deputations' concerns that KGs may be reluctant to employ experienced teachers if the LSG funding mode is adopted and will consider ways to address such concerns. With regard to the Committee's suggestion that the Government consider providing a "safety net" under which KGs may apply for additional funds on a case-by-case basis to meet expenditure on salaries of long service staff, there are grave concern that, among others, the suggested approach will lead to great uncertainties to the planning of the KGs and the financial implication to the Government. We will analyse the implications for making the final decision.

### **Salary for KG staff**

9. Some deputations' call for a mandatory salary scale for compliance by KGs is noted. We wish to reiterate that the salary-related practices under the funding mode for aided schools could not be applied to KGs in isolation. As explained above, the aided school subvention mode contains several inter-connected components such as approval of operating classes and teacher entitlement, and is subject to a basket of control measures under the Government's prudent and balanced planning of school places operated through school place allocation systems. Applying the aided school subvention mode to KGs would hinder the diversity, vibrancy and uniqueness of the KG sector and therefore is considered not appropriate.

10. We agree with the Committee that as compared to a mandatory salary scale in which teacher salary is determined solely in accordance with seniority, a reference salary range which would ensure competitiveness and at the same time allow flexibility for the KG management to decide on their staff remuneration, taking into account their teaching experience, performance, additional job duties, qualifications and training and special skills, etc. would be more appropriate.

11. To ensure that KGs use government funding appropriately for staff salary and KG teachers are reasonably remunerated, we will set out specific implementation guidelines and clear rules and regulations for compliance by KGs. For example, a certain proportion of the government subsidy should be designated for teaching staff salary expenses, and not be allowed to be used for other purposes. Also, KGs should be required to set up a transparent school-based mechanism with checks and balances for determining staff salaries.

### **Staff structure and establishment**

12. We note some deputations' view that the staff structure of KGs should not be determined solely on the basis of their enrolment size. We wish to clarify that the notional staff structure and manning ratio as proposed by the Committee is for the purpose of computing the government subsidy. As mentioned above, the funding for KGs under the new policy as recommended by the Committee would be provided partly on a per student basis and partly on a school-specific basis to cater for the special circumstances of the KGs or the students. KGs could use the funding flexibly, subject to rules and regulations to be set out by the Government, to employ sufficient staff and assign duties to them having regard to their operational needs. WD and LWD KGs could also deploy the additional WD/LWD subsidy to meet expenses arising from longer service hours.

13. With regard to the teacher-pupil (TP) ratio, it should be noted that the Committee recommended improving the TP ratio to no worse than 1:12 (with the principal excluded from the calculation). If the recommendation is adopted, KGs would be provided with funding to employ additional teaching staff to create more space for teachers for curriculum development and lesson preparation, catering for the diverse needs of the children and professional development to enhance the quality of KG education, communication with parents to strengthen home-school cooperation, etc. The principal could also devote their time fully to the administration and management as well as day-to-day operation of the KG. To provide greater flexibility for KGs to deploy their manpower resources to meet their operational needs, we agree with the Committee that it is not necessary to set a different TP ratio for different levels.

14. Regarding some deputations' views about the additional needs of WD/LWD KGs, as mentioned above, additional subsidy will be provided for KGs offering WD or LWD services. These KGs could deploy the HD basic provision as well as the additional WD/LWD subsidy holistically to employ sufficient staff to cater for their operational needs.

### **Teacher professionalism**

15. As mentioned above, the TP ratio of no worse than 1:12 has been recommended by the Committee with a view to making available more capacity for teachers to, among others, pursue professional development. All along, EDB has been providing various in-service training programmes for KG teachers free of charge to facilitate professional upgrading. We will step up professional development under the new policy with a view to enhancing the quality of KG education.

16. On the qualification requirement of KG teachers, we agree with the Committee that the Government should aim at raising the entry qualification requirement of KG teachers to degree level. The Government should also study the issue of setting a graduate teacher ratio for each KG when it reviews the future KG education policy after implementation. Meanwhile, under the new policy, a career ladder would be put in place, whereby KG principals and vice-principals would be required to possess a degree in early childhood education and priority be given for degree holders to be promoted to senior teacher. In other words, there would be a certain percentage of teachers in each KG who possess a degree under the new policy.

### **Catering for student diversity**

#### Support for students with special needs

17. Early identification and early support are the Government's fundamental strategies in taking care of children with special needs, including those at pre-school level. With regard to the deputations' suggestion of providing a subsidy to enable children from needy families to acquire assessment services from non-governmental organisations (NGOs), there is concern on the availability of adequate quality assured professionals in the private market or NGO settings.

18. We share the deputations' views and the Committee's recommendation that more structured in-service training programme(s) should be offered to KG teachers to enhance their capacity to cater for students' diverse learning needs and to facilitate early identification of children with special needs.

19. We note the deputations' suggestions about increasing the number of pre-school rehabilitation service places. Indeed, the Government will continue to increase the provision of pre-school rehabilitation places. Sites have been reserved for providing about 1 470 additional pre-school rehabilitation places within this term of Government. It is expected that 3 800 additional places will also be provided through the Special Scheme on Privately Owned Sites for Welfare Uses, whereby the non-governmental organisations (NGOs) may make use of their land by way of expansion or redevelopment to provide additional welfare facilities, particularly for elderly and rehabilitation services. Meanwhile, a training subsidy is provided for children from low-income families, so as to enable them to procure non-subvented rehabilitation services.

20. On 14 January 2015, the Chief Executive reaffirmed in his Policy Address that the Government would strengthen the support for children with special needs and their families through, among others, early intervention. The Chief Executive announced that the Government would launch a pilot scheme (the Scheme) through the Lotteries Fund to invite operators of subvented pre-school rehabilitation services to provide on-site rehabilitation services so as to benefit children with special needs who were studying in kindergartens (KGs) or kindergarten-cum-child care centres (KG-cum-CCCs) as early as possible.

21. In the light of the views collected at a consultation session convened by the Labour and Welfare Bureau (LWB) and Social Welfare Department (SWD) with the relevant stakeholders (including principals and teachers of KGs/KG-cum-CCCs, representatives of parent associations and non-government organisations providing to Government subvented pre-school rehabilitation services), SWD has issued the invitation to NGOs operating subvented pre-school rehabilitation services to submit projects for consideration. A cross-departmental vetting committee, including LWB, SWD, EDB and the Department of Health (DH), was set up to examine the proposals submitted by NGOs. The vetting committee notified the applicants NGOs of the vetting result in



October 2015. The projects will commence from the fourth quarter of 2015 to January 2016, providing about 2,900 places for children with special needs in some 450 KGs or KG-cum-CCCs. The Scheme will span over two years.

22. The Scheme will have the following key features:

- (a) On-site rehabilitation services will be provided to children with special needs who are studying those KGs or KG-cum-CCCs participating in the Scheme. The NGOs will also provide centre-based services to support the outreaching teams offering on-site rehabilitation services at KGs and KG-cum-CCCs;
- (b) the service will be delivered by inter-disciplinary teams (comprising occupational therapists, physiotherapists, speech therapists, clinical / educational psychologists, social workers and special child care workers) through different modes, including on-site individual or group training, professional consultation workshops and seminars, etc; and
- (c) apart from children with special needs, professional support and assistance will be provided for teachers/child care workers and parents of participating KGs or KG-cum-CCCs.

#### Support for Non-Chinese Speaking (“NCS”) students

23. With regard to providing additional resources to KGs admitting NCS students, the Government is considering the Committee’s recommendation of providing additional assistance, in the form of a grant comparable to the salary of a KG teacher, for KGs admitting a cluster of NCS students (say eight students or more) to enable them to enhance the support for these students. For KGs admitting only a few NCS students, we share the Committee’s view that they could basically be able to provide an immersed Chinese language environment which facilitated their early integration. As suggested by the Committee, KGs admitting NCS students should be encouraged to make use of existing means and resources (e.g. Language Fund, Quality Education Fund) to cater for the needs of these students.

24. With regard to admission, all along, parents have autonomy in choosing a KG suitable for their children with regard to their needs and preference while KGs, being privately run, may handle student admission matters at their discretion subject to prevailing regulations, rules and guidelines issued by the EDB. According to available figures, quite a number of KGs have admitted NCS students. In the 2014/15 school year, there were about 11 900 NCS students studying in some 560 KGs (around 76% offering local curriculum, 20% non-local curriculum and 4% both), accounting for 57% of all KGs in Hong Kong. Among 7 000 NCS students studying in local KGs, about 5 000 (over 70%) were in PEVS KGs. These students were distributed in some 380 PEVS KGs (that is, over 50% of all PEVS KGs) in all 18 districts in Hong Kong. While we note that a small number of these PEVS KGs have more than 50% of their student enrolment being NCS due to their unique cultural and religious background and parental choice, there is no evidence that shows “racial segregation” as indicated by some deputations.

25. To ensure equal education opportunity for all children regardless of their race, gender and ability, EDB has advised schools via different channels, including school circular and briefing sessions, that their school-based admission mechanism should be fair, just and open, and in compliance with the existing legislation (including the anti-discrimination ordinances like Race Discrimination Ordinance (RDO)) as well as circulars and guidelines issued by the EDB. KGs are required to inform parents in advance of the details of their admission mechanism through effective channels (e.g. guidance notes in application forms, admission guidelines/leaflets, school website, etc.). Besides, KGs should put in place an effective means of communication and provide assistance (such as translation and/or interpretation) for NCS students/parents as far as possible. In mid-June this year when briefing sessions on admission arrangements were conducted, EDB invited representatives from Equal Opportunities Commission to share with KGs the important points to note in admission arrangements and to promote the understanding of the RDO in the sector. We will continue to explore various means to increase the awareness of various anti-discrimination ordinances among all KGs.

26. As for the accessibility of information on KGs, EDB has been trying to help parents (including NCS parents) make an informed choice of KG for their children. Various information materials regarding KG education and admission arrangements are publicised in different ethnic

languages. Simultaneous interpretation service is also provided in some parent seminars to cater for the NCS parents. The Profile of KGs and KG-cum-CCCs (KG Profile) updated and issued annually contains basic information of individual KGs (such as school name, address, telephone, approved school fees, information of student enrolment, serving teachers, etc.) as well as other information provided by KGs (such as school facilities, curriculum details, school characteristics, etc.). All the basic information in the KG Profile is provided in both the Chinese and the English language. While the information about school facilities, curriculum and characteristics is currently provided only in Chinese, we plan to provide also the English version starting from the 2016/17 school year to facilitate NCS parents to acquire as much information as possible through the KG Profile. We will also explore ways to promote KG education to a wider NCS community in collaboration with NGOs in future.

27. Curriculum resources available on the EDB website are usually written in different languages according to the needs of target readers. For curriculum documents and information for parents, resources in both Chinese and English versions are available. Some materials have also been translated into various ethnic minority languages so as to address the needs of NCS stakeholders. As Cantonese is used as the medium of teaching in KGs adopting the local curriculum, reference materials for teachers, especially those for experience sharing, would mainly be produced in Chinese with a view to facilitating professional exchange and collaboration among KG practitioners.

28. With regard to the need to design a “Chinese as a Second Language Curriculum” for pre-primary NCS students as raised by some deputations, we wish to point out that KGs adopt an integrated curriculum mode that embraces thematic learning across different areas instead of teaching by individual subjects. It allows children to acquire knowledge of each learning area, develop different skills as well as cultivate respective attitudes through various meaningful games and activities. For supporting NCS children to learn Chinese, we suggest that teachers create a language-rich learning environment in Chinese for the NCS children to play and learn together with the local children so that NCS children could acquire Chinese naturally through authentic life experiences. We will continue to commission, through the Language

Fund, NGOs to organise district-based programmes for NCS children aged 3 to 9 to motivate them to learn Chinese through fun activities.

29. With regard to school-based support, EDB has commissioned the University of Hong Kong to provide teacher professional development programmes and on-site support through the University-School Support Programme. In the 2015/16 and 2016/17 school years, EDB will launch a new University-School Support Programme aiming at enhancing teachers' professional capabilities in teaching Chinese to NCS children and supporting NCS students' smooth transition from kindergartens to primary schools.

#### Support for students from needy families

30. To ensure that no child would be deprived of the opportunity to receive quality KG education due to lack of financial means, we agree with the Committee that the existing Kindergarten and Child Care Centre Fee Remission Scheme should be maintained to provide additional financial assistance for children from needy families, including those who opt for WD/LWD KG services. In addition, the Committee recommended that an additional grant be provided for needy families (i.e. those who can pass the means test) to pay for the expenditure incurred from the learning or schooling of the students such as for purchase of books and school uniforms, etc. These recommendations are being considered together with the others as proposed by the Committee.

#### **Premises-related issues and longer-term provision of KG premises**

31. To ensure proper use of public funds, we share the view of the Committee that the rental subsidy for individual eligible KGs should be subject to a ceiling and contingent upon the student enrolment.

32. In order to increase the number of KGs that will not have to charge any school fees to defray rental expenses, a stable supply of Government-owned quality KG premises is crucial. To achieve this as a long-term strategy, the Government will earmark space for KG use in public housing estates to meet new demands as well as for relocation of existing KGs that require substantial improvement to their physical accommodation. We will also explore the feasibility of other measures, such as co-location of KGs and primary schools and increasing KG space

in private housing estates, with regard to the recommendations of the Committee.

33. With a view to increasing the supply of WD places to meet the increasing demand and to support working parents, we agree with the Committee that the planning standards should be revised as necessary to 500 WD and 500 HD places for every 1 000 children aged between three and six.

### **School governance**

34. We will take into account the views of the stakeholders in the process of compiling administrative guidelines and operation manuals for compliance by eligible KGs. Also, if there will be any government subvention for the KGs under the new policy, there must be enhanced transparency and accountability in the school governance and management.

35. With regard to the proposal of involving different stakeholders in the KGs' management committees, including parents from different ethnic diversities as appropriate, EDB will work out the details in consultation with the KG sector.

### **Parents' involvement and education**

36. The deputation's views on parent education as well as support for parents of children with special needs are noted. More detailed information on these issues is provided separately in Attachment 3 of our reply dated 30 October 2015.

### **Research on early childhood education**

37. The view of the deputations about the need for more local researches that meet the needs of the community is noted. As a matter of fact, it coincides with the recommendation of the Committee that more local policy-oriented research with a focus on quality KG education should be encouraged to help keep the sector better informed of the latest trends in child development, children's learning needs and the development of KG education.

## **Implementation**

38. The deputation's view about the formation of the steering committee as recommended by the Committee to oversee the implementation of the future policy is noted. We will consider the appropriate forum to achieve the objective.

Education Bureau  
November 2015