

**For information
on 17 February 2003**

LegCo Panel on Education
Progress on the Harmonisation of Pre-primary Services
Way Forward for Harmonisation of
Kindergartens and Child Care Centres

Purpose

This paper briefs Members on the way forward for harmonisation of kindergartens (KGs) and child care centres (CCCs) in the light of the public and operators' views on the Consultation Document on Harmonisation of Pre-primary Services.

Background

2. The Consultation Document was issued in April 2002 to seek the views of the pre-primary sector and the general public. Between May and July 2002, 11 consultation sessions were held. About 4 400 written submissions were received. A summary of views is at Annex 1.

Recommendations

3. The views and suggestions have been studied by the Working Party on Harmonisation of Pre-primary Services. The direction of harmonisation was in principle supported by the respondents but there was some disagreement over a number of issues. After careful consideration, the Working Party proposed some modifications to the original recommendations to address the concern of the sector and the public.

(I) Modifications and clarifications

On meal charge

- (a) a meal charge (not exceeding \$400 per month for children aged 2-6 and \$500 for children aged 0-2) would be included in the inclusive monthly fees and subject to fee remission under Kindergarten Fee Remission

Scheme (KGFRS) (**paragraph 12**);

On transitional arrangements

- (b) the “no worse-off” principle applying to beneficiaries under the existing KGFRS and Fee Assistance Scheme (FAS) would also cover those children to be transferred from day crèches (DCs) to day nurseries (DNs)/ KG-cum-DNs and transferred between institutions during the transition (**paragraph 14**);

On staff issues

- (c) all serving and trained Child Care Workers (CCWs) and KG teachers would be mutually recognized by the Education and Manpower Bureau (EMB) and the Social Welfare Department (SWD) as Registered Teachers/Qualified Kindergarten Teachers (QKTs) and CCWs upon harmonisation without further qualification assessment or requirement of attending conversion courses (**paragraphs 16 and 17**);
- (d) existing service coordinators of CCCs subvented by SWD will be grandfathered till their retirement/resignation (**paragraph 15**);
- (e) the minimum standard requirement for KG-cum-CCC is one supervisor who can either be a registered child care supervisor or a kindergarten principal;

On monitoring of KG-cum-CCCs

- (f) KG-cum-CCCs receiving children 2-6 and including centres for children 0–6, though governed by different ordinances, will be monitored by one authority (i.e. the joint office) in order to provide one-stop service;

On performance indicators

- (g) there would be only one performance monitoring system for KG-cum-CCCs (**paragraph 19**);

On ancillary services

- (h) ancillary services including Integrated Programme (IP), Extended Hours Service and Occasional Child Care Service would remain under SWD’s purview (**paragraph 20**);
- (i) Integrated Kindergarten (IKG), now under EMB, will gradually be phased out and the resources of IKG will be transferred for creating additional IP places in phases (**paragraph 20**);

On implementation plan

- (j) harmonisation would be implemented from the school year 2004/05 to allow more time for the sector and the public to be prepared for the changes (**paragraph 21**);

(II) Proposals to remain unchanged

On admission age and monitoring authority

- (k) the minimum age for kindergarten education should remain at 3 (**paragraph 5**);
- (l) the edu-care services for children aged 3 to 6 should be provided at KGs and regulated by the Education Ordinance, while child care services for children aged 0 to 3 at CCCs should be regulated by the Child Care Services Ordinance (CCSO). A joint office staffed by EMB and SWD officers and managed by EMB should be set up to monitor the co-located education and care services. Special child care centres should continue to be placed under the supervision of SWD and regulated through CCSO (**paragraph 6**);

On staffing standards and operational requirements

- (m) the minimum ratio of teacher/ CCW to children aged 2 to 6 should be 1:15. The minimum ratio for children aged 0 to 2 should remain at 1:8 (**paragraph 7**);
- (n) operators should be given the option to provide meals through their own kitchen or licensed caterers (**paragraph 8**);
- (o) the minimum floor space requirement for children aged 2 to 6 is 1.8 m² net activity area per child, while for children aged 0 to 2 is 2.8 m² net activity areas per child or 3.3 m² per child with both activity areas and ancillary areas included;

On assistance to service providers

- (p) the 5% Subsidy Scheme for CCCs will no longer be in place. The ambit of the Kindergarten Subsidy Scheme (KSS) should be expanded to cover CCCs. The rate of subsidy for children aged 2 to 6 will be based on groups of fifteen children or part thereof, while that for children aged 0 to 2 will be based on groups of eight children or part thereof, taking full account of the statutory staff to children ratio of 1:8 applicable to DCs (**paragraph 9**);

On assistance to parents

- (q) one single means-testing mechanism should be adopted to determine financial assistance to all pre-primary children. The ambit of the KGFRS applicable to KG children will replace the existing FAS and be expanded to cover children attending CCCs. Full day rate of fee remission for all pre-primary children is only payable upon proof of 'social needs'. Children aged 3-6 attending a half-day DN now not eligible for financial assistance under the FAS will become eligible under the new arrangement (**paragraph 11**); and

On service alternatives to children aged 0 to 3

- (r) while promoting home and family care for infants below the age of 3, day crèches will continue to exist for needy families. Because of the declining population of children age 0-3 (149 092 in 2001 against 195 165 in 1996, about 25% drop), the demand and enrolment for day crèche service has been decreasing over the past years. To cater for the changing needs of families as a result of social change, a variety of non-institutional care services will be developed in parallel to provide more options for parents with child care need but having no other alternatives (**paragraph 18**).

Justifications

Guiding principles

4. The Working Party has adopted the following guiding principles in proposing the way forward for harmonisation -

- (a) Disparity in the delivery of service and financial assistance should be eliminated as far as it is practicable;
- (b) Where re-distribution of resources is involved, it should be initiated on a fair basis for the good of children; and
- (c) Where changes are required, they should be made for improving the quality of pre-primary services.

On admission age

5. Learning and care are amongst the core needs of children under the age of 6. Education comes into being naturally when children begin to learn at their

earliest age. However, as to when kindergarten education should begin, there are often controversial arguments. Survey findings indicate that for governance arrangements of pre-primary service in most countries, the minimum age for pre-primary / KG education is set at 3 (Annex 2). To avoid over-education at the expense of care and other developmental needs, it is recommended that we should adhere to the proposal for KG education to start at the age of 3.

On monitoring authority

6. In view of the different emphases, the CCC and KG sectors have been governed by two ordinances and monitored by two departments. Care and education are complementary elements in the development of children at early ages but kindergarten education should not be brought in earlier than 3. Hence, children before the age of 3 should receive more care than education and to help them develop a positive attitude towards learning gradually as they grow from 3 onwards. This is the underlying rationale for governing the pre-primary service for children from 0 to 3 and from 3 to 6 respectively by two different ordinances. Harmonisation of the two sectors will involve a number of financial, operational and staffing issues and consequential amendments to the ordinances are required. The Joint Office is set up to facilitate operators that provide both types of services. The suggestion for educare programme and services for children aged 0 to 6 to be governed by one ordinance and monitored by one department may be considered as a long-term goal.

On staff to children ratio

7. The proposed staff to children ratio of 1:15 is only a minimum standard. Operators are free to adopt a more generous ratio. On the part of the KG sector, which has been improving the ratio since the 2001/02 school year, further lowering of the ratio to below 1:15 will have a substantial impact. It is estimated that on the basis of 7 500 full-day and 148 700 half-day KG children in the 2001/02 year, an additional 567 teachers will be required if the ratio is to be improved from 1:15 to 1:14. The fees for a half-day and a full-day KG will have to increase correspondingly by \$70 and \$94 per month respectively. Furthermore, as the current teacher to pupils ratio is 1:30 for KG classes, conversion to 1:15 is easier than to 1:14, which may result in mismatches or wastage. On balance, the recommendation that the ratios of 1:15 for the 2-6 age group and 1:8 for the 0-2 age group respectively should remain unchanged.

On provision of kitchen

8. Full-day KGs have been operating without a kitchen for years and parents have found no problems with such a practice. Currently, licensed caterers are providing lunch to high standards. Compulsory provision of a kitchen in full-day KGs will cause operational problem and increase cost. It is thus recommended that subject to a set of prerequisite requirements for food quality assurance, operators should be given the option to provide meals through their own kitchen or licensed caterers.

On assistance to service providers

9. Expansion of the KSS to cover the CCC sector in place of the 5% Subsidy Scheme is welcomed by the CCC sector. The sector's proposal to count a full day class as two half-day groups is not considered justified as the amount of subsidies is based on the total number of children enrolled. The recommendations in the Consultation Document should be upheld.

On assistance to parents

10. Starting from the 2002/03 school year, the KGFRS has been enhanced by adopting an adjusted family income mechanism and adding a new tier of 75% to benefit more families. The improvement entails additional expenditure of about 141 million in the 2002/03 school year to benefit 2 800 more KG children and enable 34 000 KG children to receive more assistance under KGFRS.

11. Consistent with the financial assistance schemes for students of other levels, we consider that the current 3-tier KGFRS, which has already taken into account the mode of service and the reasonable share of parents towards fees, is adequate. To ensure that existing beneficiaries under the KGFRS and FAS do not suffer upon harmonisation, we would adhere strictly to the 'no worse-off' principle. To remove disparity is a principal objective of harmonisation. To this end, the KGFRS should replace the FAS and cover children aged 0 to 6. To improve the quality of early childhood education, it is more relevant to enhance teacher training and professional development and improve the quality assurance mechanism.

On meal charges/Air-conditioning expenses

12. Request for inclusion of meal charges was raised mainly by CCC operators. Currently, fees for CCCs have already included meal charges but such changes are not included in the fees for KGs. Taking into consideration that lunch is part of the edu-care program provided by full-day pre-primary institutions, and that unlike primary and secondary students, pre-primary children may not be able to bring and handle their own lunch if their families choose not to take the meal supplied by KGs/CCCs, it is recommended that meal charge (not exceeding \$400 per month for children aged 2-6 and \$500 for children aged 0-2) be included in the inclusive monthly fees and subject to fee remission under KGFRS.

13. Currently, air-conditioning fees are collected separately in CCCs but are included in the inclusive fees of KGs. To remove disparity and improve the service in CCCs, the expenses on air-conditioning will be subsumed in the fees and subject to fee remission under KGFRS.

On transitional arrangements

14. There have been requests for allowing existing beneficiaries (including those admitted in the 2002/03 school year) to continue receiving FAS subsidies even when they transfer between institutions or transfer from DCs to DNs/KG-cum-DNs. As it will be difficult to be understood by parents why the grandfathering arrangement will not be applied for transfers mentioned above and considering that there will not be many such cases involved, it is recommended that as an improvement measure during the transition, children transferring from DCs to DNs/KG-cum-DNs and between institutions will be covered by the grandfathering arrangement.

On staff issues

15. Some operating non-government organizations (NGOs) appointed coordinators to manage and supervise CCCs under their sponsorship. There are at present CCC coordinator posts subvented by SWD. Since this is a traditional arrangement for the good of the institutions, it is recommended the existing service coordinators of CCCs be grandfathered till their retirement/resignation.

16. Given that the CCWs are currently providing education and care to children aged 0 to 6, there were calls that they should be allowed to be

registered as QKTs in order that they could serve in KGs or CCC-cum-KGs in future. On the other hand, CCCs would also be open to QKTs as a reciprocal complement. At present, about 2 800 CCWs and some 1 000 QKTs registered before 1997 may not meet the new registration requirements. Mutual recognition of these under-qualified CCWs and QKTs was a major issue of their concern over the proposals for harmonisation.

17. Though the training courses attended by CCWs and QKTs differ in programme structures, they have common modules on education and child care. Furthermore, these CCWs and QKTs are very experienced, i.e. having been serving in their respective institutions for more than 5 years by the time harmonisation is implemented. It is recommended that all serving and trained CCWs and KG teachers be mutually recognized by EMB and SWD as Registered Teachers/QKTs and CCWs upon harmonisation without further qualification assessment or requirement of attending conversion courses.

On service alternatives for children aged 0 –3

18. Due to a decline in children population, the utilization rate of day nursery and day crèche has dropped over the past years. In fact, the 500 additional day nursery places to be provided in 2002-03 as pledged in the 2001 Policy Address has been frozen. As a result, the new day nursery projects set up will be reserved for reprovisioning purpose. In response to such changing demand, similar measures including reduction of capacity and closing of centres have been carried out in day crèches and day nurseries all along. In future, while promoting home and family care for infants below the age of 3, day crèches will continue to exist for needy families. To meet the changing need of families as a result of social changes, a variety of non-institutional care services will also be developed in parallel to provide more options for parents with child care need but having no other alternatives.

On performance indicators

19. The performance indicators applicable to KGs will also apply to KG-cum-DNs (aged 2-6) or KG-cum-CCCs (aged 0-6) as well, i.e. there will be only one performance monitoring system in order to eliminate inconvenience and confusion to the sector. Details will be worked out by the Special Team.

On ancillary services

20. Ancillary services including IP, Extended Hours Service and Occasional Child Care Service will remain under SWD's purview and existing CCCs opting to become full day and non-profit-making CCCs/KGs will continue to be entitled for Lotteries Fund support if meeting certain criteria including provision of ancillary services. As the two programmes of IP and IKG have similar objective and similar target children, the co-existence of two programmes upon harmonisation is no longer appropriate. Without compromising the service to needy children, the existing IKGs will be arranged to phase out gradually while the same number of IP places will phase in at the same time. In order to uphold the principle of no reduction of service, the resources of IKG will be transferred from EMB to SWD for creating additional IP places in phases.

On implementation plan

21. In response to requests from the sector for more time to prepare for the changes, it is recommended to implement harmonisation from the 2004/05 school year. A Steering Group with stakeholders' representation will be set up in early 2004 to advise on implementation details.

Way Forward

22. Subject to members' views, we will introduce legislative amendments and implement the harmonisation as set out in this paper.

Education & Manpower Bureau
Health, Welfare and Food Bureau

February 2003

Consultation Document on Harmonisation of Pre-primary Services
Summary of major views from public/child care centre/kindergarten sector

Major views collected during consultation sessions and from written submissions from members of the public, the child care centres and kindergartens on the consultation document on harmonisation of the pre-primary services are summarized below. A total of 11 consultation sessions were held and about 4,400 submissions received.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Part 1 Introduction	
The Working Party in Harmonisation of Pre-primary Services	
1.6 Harmonisation and the long-term goal of unification of pre-primary services should be pursued	<ul style="list-style-type: none">• Support harmonising child care centres and kindergartens so as to achieve quality pre-primary services and to let parents choose their suitable service type and children stay in the same institution till admission to primary school.• Agree to the four basic principles when formulating proposals on harmonisation of pre-primary services.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Part 3 Unification of Pre-primary Services	
Developmental Characteristics and Learning Needs of Children <i>Minimum Age for Pre-primary Education</i>	
<p>3.9 Minimum age for pre-primary education should remain at 3</p>	<ul style="list-style-type: none"> • Objection from the day crèche (DC) operators, parents of DC service and education institutes to the policy for pre-primary education to start at the age of 3, and for those below the age of 3 (particularly the group of 0-2) to be taken care of in their own families as far as possible. Their counter-argument is that children should start learning as early as possible. The policy to start pre-primary education at the age of 3 is a retrograde step of the DC service. It may lead to phasing out of DCs; needy parents having to resolve their child care problem by bringing their children back to China for care thus giving rise to parent-child separation; and redundancy / unemployment of frontline workers. • <ul style="list-style-type: none"> a) The age for schooling should start at 2 b) Leave it to parents to decide the age of pre-primary education c) There are also views supporting the minimum age for formal education to be set at 3. d) Children aged below 3 should best be taken care of at home by parents, if possible

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p><i>A Joint Office</i></p>	
<p>3.12 The education services for children aged 3-6 be provided at KGs and regulated by the Education Ordinance (EO) while child care services for children aged 0 to 3 at CCCs should be regulated by the Child Care Services Ordinance (CCSO)</p> <p>3.14 A joint office should be established to monitor the co-located education and care services in accordance with the EO and CCSO</p>	<ul style="list-style-type: none"> • Support having the pre-primary service for 0-3 age group monitored by SWD under the CCSO and 3-6 age group by EMB under the EO. • KG-cum-CCC (for children 0-6) should be governed by one ordinance and monitored by one authority in order to provide one stop service in the long run. • Some considered the Joint Office redundant. Upon implementation, when DNs opt to operate KG-cum-DNs, they have to apply to the Joint Office for two registration certificates and under the monitoring of two Ordinances. This is administratively less tidy than the existing practice under which DNs will be monitored by one Ordinance and one department. • Some comments are in favour of the setting up of the Joint Office as long as representatives from the sector will be invited to advise on the formulation of the implementation details and the work of the Joint Office.

Recommendations in Consultation Document	Major views/suggestions from public and sector
3.15 Special child care centres (SCCC) continue to be placed under the supervision of SWD and regulated through CCSO	<ul style="list-style-type: none"> • Support special child care centres being placed under the ambit of SWD because of its rehabilitative nature.
Part 4 Staffing Standards and Operational Requirements	
Overview <i>Other Child Care Support to Parents</i>	
4.4 Other forms of child care support in the community should be encouraged to provide flexible child care alternatives for parents	<ul style="list-style-type: none"> • Regarding the suggestion to develop a wide variety of alternative child care services to needy parents, there are divergent views. Many operators object while some have no strong objection. Some comments recognize the need to re-engineer day crèche service due to its heavy operating cost and the shrinking children population. Review of the policy on day crèche service to meet the changing needs of the society and more promotional work to publicize the day crèche service are suggested. • There is a general concern on the quality assurance of these alternative services including hygiene, safety, nutrition, qualification and training of childminders/foster parents, etc.

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p><i>Ancillary Services</i></p>	
<p>4.5 Other ancillary services will also be provided in CCCs and KGs on demand</p>	<ul style="list-style-type: none"> • To maintain the provision and subvention for Occasional Child Care Service (OCCS), Extended Hours Service (EHS) and Integrated Programme for disabled children (IP). • The existing service delivery model of IP for disabled children including the para-medical support services e.g. Physiotherapy, Speech Therapy, the referral mechanism and the subvention mode etc. should be maintained. • There is suggestion to extend CCC's para-medical support services of IP to IKGs. • The child care sector requests the future planning, referral and monitoring system of the IP to remain under the purview of SWD because of its rehabilitative nature.
<p>Staff to Children Ratio</p>	
<p>4.7 To adopt the ratio of 1:15 for all children aged 2 to 6 as the minimum standard</p> <p>4.8 For children aged 0 to 2, the minimum standard is 1:8</p>	<ul style="list-style-type: none"> • Objection from the sector to lowering the staff-children ratio from 1:14 to 1:15 for children 2-6 as it can hardly meet the children's need for intensive care and supervision, and will compromise the service quality. There are suggestions to further improve the ratio to below 1:14 such as 1:10 or 1:12 for children aged 2-3 who require more intensive care.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Floor Space Requirements for Children	
<p>4.11 New DNs and KGs should follow the current requirement of 1.8 m² per child</p> <p>4.12 No change for DCs</p>	<ul style="list-style-type: none"> • There is concern on the floor space requirement for CCCs for children aged 0-3. • In new KG, each child should be provided with sufficient floor space for activities.
Provision of Kitchen	
<p>4.14 Service providers to be given flexibility to provide meals either through their own kitchens or licensed caterers</p>	<ul style="list-style-type: none"> • Catering is not preferred. There may be possible contamination of food during the course of delivery and it may affect the health of the young children. Also, service hours may not tie in with the nursery programme. It is suggested to maintain the provision of kitchen. Waiving of the kitchen requirement is recommended for the existing full-day kindergartens if it is structurally infeasible to set up a kitchen. A kitchen is required in all new full-day pre-primary services.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Other Requirements	
4.15 Different requirements between CCCs and KGs should be further studied by a Special Team	<ul style="list-style-type: none"> • There is concern whether the future KG-cum-DN should keep two financial accounts. • There is also concern on the need for maintaining separated fee charges for DC-cum-DN section in view of different staff-children ratio for different age group. • For centres that have surplus/deficit incurred in the day nursery account (such as occasional child care service, extended hours service, air-conditioning fee, etc), would the surplus/deficit be brought forward to the future KG-cum-DN.
Part 5 Subsidies, Fees and Fee Assistance	
Assistance to Service Providers	
5.5 (a) NPMKGs and NPM/aided CCCs may continue to receive reimbursement of rent, rates and government rent	<ul style="list-style-type: none"> • Supported by the sector.

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p>(b) The reimbursement of management fees and air-conditioning fees to future KGs converted from DNs may continue</p> <p>(c) KSS should be expanded to cover CCCs</p> <p>(d) NPM KGs may also apply for grants under the Lotteries Fund</p>	<ul style="list-style-type: none"> • Supported by the sector. • Full-day class should be counted as two groups as the costs for operating a full-day class is the same as two half-day classes. • Under the new KSS, KG with low enrolment rate receives less subsidy than before and consequently it may face financial difficulty. Review of the new KSS is suggested. As operators applying for KSS have to observe the pay scale for child care staff, there is little flexibility allowed for operators to control the fee level. • As the development in the first five years has significant influence on a child’s future, it is worth for the Government to put more resources in pre-primary education and to include it in basic education. It is necessary for Government to subsidize pre-primary education in the same way as primary education so as to achieve a smooth interfacing of the two levels of education. Free pre-primary education is suggested. • Supported by the sector.

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p>Assessment of Inclusive Fees</p>	
<p>5.7 (a) Reasonable above-standard staff provision, which helps improve service quality, can be included</p> <p>5.7 (b) Expenses on air-conditioning should be subsumed in the inclusive fees</p> <p>5.7(c) The cost of food and employing cook(s) should be reflected in the lunch fee to be charged separately</p>	<ul style="list-style-type: none"> • The sector is concerned that the operators will not adopt an above-standard staff provision which jets up fees and makes the centre less competitive. • Support recognizing above-staff standard provision in fee assessment and suggest including the provision of part-time English and Putonghua teachers. • Support including air-conditioning fee in the inclusive monthly fee. • Lunch is considered as part of the edu-care programmes in full-day pre-primary centres. Some children, in particular those from the disadvantaged families, cannot afford the meal charge. If for this reason they are excluded from the meal time while their parents may not be able to provide them with proper meal, their self-image and learning opportunity may be hampered. It is suggested that meal charge should be included in the monthly fee. • It is suggested to set up a special grant to subsidize parents who cannot afford the meal charge should it be excluded from monthly fee.

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p>5.7 (d) A surplus of not more than 5% will be allowed for NPM KGs to build up reserves for measures to enhance the quality of service. For private independent KGs, the Working Party would welcome views on whether profit margin should be set at 10% or 15%</p>	<ul style="list-style-type: none"> • A surplus of not more than 5% per annum is appropriate for improvement of service quality. • The profit margin for NPM KG should be 10-15%.
<p>Assistance to Parents</p>	
<p>5.11 - 5.12 The KGFRS (with 100%, 75% and 50% remission levels) should be expanded to replace the CCCFAS and cover children aged 0 to 6</p>	<p>(a) Improvement of fee assistance</p> <ul style="list-style-type: none"> • Under the enhanced KGFRS, parents have to pay more for day nursery and particularly day crèche fees. Many parents are unable to afford the high fees. This may result in the needy groups having less choice of child care alternatives, hence having to quit their jobs to look after their children or to turn to CSSA. The sector requests to improve the KGFRS by adding more tiers. There are suggestions for adding a 25% tier, or more tiers between 50% and 100%, i.e. 60%, 70%, 80% and 90%..

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
<p>5.12 To have one single means-testing mechanism for determining financial assistance to all pre-primary children</p>	<ul style="list-style-type: none"> (b) Level of payment <ul style="list-style-type: none"> • As the payment of KGFRS will be based on the weighted average fee of NPM KGs or the actual fee of the centre, whichever is the less, there are cases that parents who are now eligible for full remission (under the general maximum fee assistance level) have to pay several hundred dollars to cover the difference. In working out payment, reference should be made to the actual fee charged or the general maximum fee assistance level. (c) Retain CCCFAS for 0-3 <ul style="list-style-type: none"> • Since the nature of child care service is care-oriented and it serves families with special needs, KGFRS which is meant for the education sector should not be applied. Maintenance of the current FAS is appropriate for the 0-3 age group. • To postpone application of KGFRS to CCCs to beyond the 2003/04 year. (d) Adopt CCCFAS for 0-6 for families with social needs <ul style="list-style-type: none"> • The CCCFAS is more reasonable as it takes into account the net income of the family, i.e. excluding rental expenses. It should be adopted for 0-6. • One single fee assistance scheme and central processing by Student Financial Assistance Agency can facilitate parents' understanding on the application procedures and ensure that there is no disparity in services provided.

<p align="center">Recommendations in Consultation Document</p>	<p align="center">Major views/suggestions from public and sector</p>
<p>5.14 Financial assistance should continue to be available to those with social needs attending full-day programme</p> <p>5.15 The “no worse-off” principle will apply to beneficiaries under the existing KGFRS and CCCFAS</p>	<ul style="list-style-type: none"> • Parents who are part-time workers having half-day child care needs should also be eligible for half-day assistance for their children 0-3. • Support adopting the proposed criteria for assessing social needs. • To allow existing beneficiaries (including those admitted in the 2002/03 school year) to continue receiving FAS even when they transfer between institutions or transfer from DC to DN.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Part 6 Kindergarten Teachers and Child Care Workers	
A Fully-trained Pre-primary Workforce	
<p>6.8 Fully-trained pre-primary workforce will have been attained by Sept 2004. No change to the basic qualification (i.e. QKT or equivalent) for the time being</p>	<ul style="list-style-type: none"> (a) Coordinator of child care centre <ul style="list-style-type: none"> • To maintain the post of coordinator and to be subvented through central administration. • Training opportunity for coordinator. (b) Child Care Supervisor (CCS) <ul style="list-style-type: none"> • To recognize CCS as principal of kindergartens and vice versa. • There is concern whether there should be 2 supervisors or 1 supervisor for KG-cum-DN. • Training opportunity for CCS. • CCS of Special Child Care Centre should be exempted from fulfilling the training requirement of completion of the CE course before 2005 in view of the rehabilitation nature of their duties.

<p style="text-align: center;">Recommendations in Consultation Document</p>	<p style="text-align: center;">Major views/suggestions from public and sector</p>
	<p>(c) Child Care Worker (CCW)</p> <ul style="list-style-type: none"> • Whether the CCWs received training before 1997 and without Qualified Kindergarten Teacher qualification (less than 360 hours of training and Form 3 qualification) can continue to work in the KGs converted from CCCs in future. The sector has worries that there is no opportunity for KG teachers and CCWs who completed their professional training before 1997 to work interchangeably. There is suggestion that all serving and registered CCWs should be recognized as qualified teachers so that they can continue to serve in the sector and be recognized as trained staff in order to comply with the fully-trained staff requirement under KSS. • There is concern whether the existing qualifications and training of CCWs be recognized. • A system of mutual recognition of prior studies in Early Childhood Education (ECE) among the tertiary institutes should be developed to facilitate child care staff to pursue further studies. Bridging courses should be provided for university graduates who wish to enter the pre-primary services field and receive training for working with children at the early childhood level. • By 2004/05 school year, it is not necessary to have 100% trained staff. A lower %, such as 70% or 80%, of trained staff would enable the centre to have the flexibility to employ staff of other qualifications and this may give “impetus” to the delivery of service and help to reduce the operation cost.

Recommendations in Consultation Document	Major views/suggestions from public and sector
	<ul style="list-style-type: none"> • The salary of child care workers should commensurate with their professional qualification obtained and should be delinked from the recommended points of the Master Pay Scale to allow flexibility for operators in setting salary according to centres' financial condition as well as staff s' performance. • Child care staff should be provided with learning opportunities to acquire higher qualification up to bachelor degree in ECE instead of C(ECE) or an associate degree in ECE as mentioned in para. 6.8 of the Consultation Document. Training subsidy should be granted to child care staff pursuing studies for higher qualification. • To subsidize the personal emolument of staff / teachers in child care centre / KG (including those well-run private schools) fully / directly by government. <p>(d) Minor staff</p> <ul style="list-style-type: none"> • There is concern if there will be a recognized ratio for workman.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Part 7 Quality Assurance Mechanism	
<i>Future Monitoring of KGs and CCCs</i>	
<p>7.6 Internal QA through self-evaluation and external evaluation</p> <p>7.14 Monitoring of future CCCs should be maintained in the current mode</p>	<ul style="list-style-type: none"> • KG-cum-DN should adopt one single quality assurance. • Support adopting the current Funding and Service Agreement and Standard Quality Service Mechanism for monitoring future CCCs.

Recommendations in Consultation Document	Major views/suggestions from public and sector
Part 8 Implementation Strategies and Concluding Remarks	
General Principles and Implementation Plan	
<p>8.1 The primary concern should be on the needs of children and parents</p> <p>8.2 To set up a Steering Group to steer and a Special Team to administer the implementation details</p>	<ul style="list-style-type: none"> • Agreed to the direction of the Consultation Document but the Government needs to consult the sector and to allow sufficient time for working out the implementation details so as to ensure a smooth transition in the process of harmonisation and to let the sector and parents have better preparation for the changes. • To keep the sector informed of the final recommendation of the Working Party before implementation and to form a Steering Group with representatives from the sector to work out the implementation details such as registration procedures, service performance monitoring guidelines, funding allocation procedures, fee application guidelines, etc. • To arrange an evening session to facilitate attendance by working parents. • To extend the consultation period in order to allow time for the sector and public to digest the subject.

Information on Pre-primary Education in Some Countries

Country	Minimum age for pre-primary/ kindergarten education	Information on Pre-primary education
China	Age 3	According to the “ Child care Centre Operation Regulations” (《幼兒園工作規程》), child care centres (幼兒園) are institutions to provide children aged 3 to 6 with care and education services.
Singapore	Age 3	<ul style="list-style-type: none"> - Kindergartens under the supervision of Ministry of Education, provide a 3-year structured instructional programme for children aged 3 – 6; - Kindergartens are deemed to be schools, which have to be registered with the Ministry of Education under the existing rules and regulations on education; - Child care centres come under the jurisdiction of the Ministry of Community Development and cater for pre-school children below 7 years old.
New Zealand	Age 3	<ul style="list-style-type: none"> - Early childhood education providers aim to promote children’s learning and development from birth to school entry age; - Kindergartens under the jurisdiction of Ministry of Education operate sessional early childhood education for 3 to 5 years of age.
Germany	Age 3	<ul style="list-style-type: none"> - Daycare centres are for children aged 4 months to 2 years; - Kindergartens are for children aged 3 to 6 years; - Family daycares are for children aged 4 months to 6 years.

Spain	Age 3	Public or private pre-schools for 3- to 6-year-old stage, run according to the MEC regulations and aim at preparing for compulsory schooling.
UK	Age 3	'Local Authority Nursery Schools' and 'Class in Primary Schools' are regarded as the nursery education section in the UK. They are open during school hours, school term time for children aged 3 and 4, and are generally staffed by qualified teachers and nursery nurse.
France		'Cycle of apprenticeship' 1 st cycle – the pre-learning cycle includes children aged 2, 3 and 4 at the nursery; 2 nd cycle – basic learning cycle includes children aged 5 in the nursery, and aged 6 and 7 at primary schools.
USA		- Public or private preschools are for children aged 3 to 5; - Kindergartens are for children 5 to 6 with more structured programme; - Other child care services include child care centres and family child care homes.