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## A National Quality Framework for Early Childhood Education and Care

### Submission in response to discussion paper

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### *Our interest*

Since its inception in 1993, the National Childcare Accreditation Council (NCAC) has worked in partnership with families, services, government and other key stakeholders to facilitate and support continuous improvement to the quality of child care provided for children in Australia.

NCAC is funded by the Australian Government Department of Education, Employment and Workplace Relations (DEEWR) to administer Child Care Quality Assurance (CCQA) systems for long day care centres, family day care schemes and outside school hours care services.

For 15 years NCAC has demonstrated a commitment to the provision of quality child care experiences for all children enrolled in child care services in Australia. As at 1 September 2008 there are 9236 children's services registered with NCAC.

NCAC employs over 200 staff including experts in early and middle childhood education (Validators, Moderators and Child Care Advisers), committed administrative staff and professionals from a range of disciplines including finance, human resources, information technology, communications and management. NCAC is a recipient of the Employer of Choice for Women Award (2007 and 2008) and is a Quality Endorsed Company (2007 and 2008).

NCAC's Guiding Principle is "Putting Children First". This is evident in all of our decision making, actions, communications and customer service.

## A. National Quality Framework.

### 1. Strong quality standards

#### 1.1 What do you consider to be key drivers of quality that should be included in the standards?

The key drivers of quality included in the standards should focus on quality outcomes for children and should include:

- Staffing requirements and arrangements (ratios, qualifications, groups sizes)
- Leadership and management
- Relationships between staff and children
- Family and community partnerships
- Differentiated play-based curriculum
- Physical environment (both in terms of structure and facilities, but also as the 'third teacher')
- Health, hygiene and safety
- Child Protection
- Professional knowledge and continuing professional development for educators

The standards must recognise that children's needs change over time and they should reflect children of all ages and in a variety of child care settings.

#### 1.2 How should the increased focus on early childhood education and care outcomes for children be reflected in the new standards?

There needs to be recognition that high quality child care services are already providing quality education and care for children. All Accredited child care services participating in the Quality Assurance systems administered by NCAC provide experiences in which children learn through play, have their individual needs met, and develop the social, cognitive and physical skills necessary to succeed in life.

The standards (particularly the language used in the standards) need to promote a focus on children's learning and wellbeing in the 'here and now'. It is important to avoid overemphasising 'school readiness' and focussing on future outcomes.

The standards should be strengths-based – focusing on the children's strengths and competence. Children are active participants in their own education and care. The language should reflect that children are not needy and vulnerable, but active, competent, resilient individuals who thrive on relationships.

Much of the focus of government discussion on the standards is on preschool age children. It is important that standards are not written exclusively for this age group, but rather reflect children from birth to school age.

The increased focus on early childhood education and care outcomes for children could be reflected in the new standards by incorporating a new early childhood curriculum (ie Early Years Learning Framework).

In recognising the significance of early brain development and how this can be optimised, the standards need to reflect a focus on outcomes for the 'whole' child, where all aspects of their physical, emotional and social wellbeing are nurtured.

### **1.3 Given that preschool can be delivered across a range of settings, what is the best way of monitoring and reporting on preschool delivery for four year olds (that is, the year before formal school?)**

Designing a framework for the skills/competencies required of young children before they enter formal schooling could provide a context for monitoring and reporting on preschool delivery. Early assessment of literacy and numeracy, and cognitive skills would allow those children with additional needs to have their unique learning requirements addressed right from the outset.

The Government is advised to incorporate a requirement within the standards for services to keep documentation of children's learning and development, and to ensure this is communicated to families. It is also important for child care services to share information with schools to assist transition to school.

### **1.4 What are the considerations in an applying an integrated set of standards across all service types, including family day care, outside school hours care, indigenous services? Possible considerations include health and safety, physical environment and staffing standards in different settings, integrating preschool and care.**

Standards based on the best possible outcomes for children should apply to all child care environments and all children's services. It must be recognised that quality care can be achieved in a number of different ways, and the standards should be sufficiently broad that they can be adaptable depending on the care environment.

The standards should provide encouragement and opportunities for services to work with their stakeholders, including staff, families and children, to ensure that quality practice occurs in ways that meet the specific needs of the service.

Consideration needs to be given to a number of factors:

#### **a) The physical environment**

Unlike centre-based care, many outside school hours care services are not housed in purpose built facilities and may share facilities with others (schools, community halls, parks). Likewise, family day care homes are not designed specifically for child care.

There needs to be standards related to the physical environment, as it plays a substantial role in the quality of care provided. However, the standards need to reflect that quality care can occur in a range of settings.

#### **b) Staffing requirements**

There is inconsistency in the qualifications of staff in services across Australia. There is a large number of services relying on untrained staff. NCAC recommends that all persons caring for children be qualified with at least a diploma level qualification but preferably a degree in early childhood education or teaching.

This will prove difficult in some services and will need a long lead in time. A quick implementation of staffing requirements will be problematic due to the shortage of qualified staff. For example, the majority of family day care carers are not qualified so consideration would need to be given to avenues for raising the qualifications for family day care carers, who may otherwise be deterred from pursuing further qualifications due to cost and time constraints.

#### **c) Service philosophy**

Services have different philosophies and the standards should be sufficiently broad to accommodate this rather than seeking conformance. It is important to recognise that the philosophy of outside school hours care services is not on traditional 'education and care' but emphasises the development of social resilience, relaxation and leisure time. Current

discussions around the early learning environment may isolate outside school hours care services.

#### **d) Children's age and stage of development**

Although the basic outcomes of quality practices and experiences are the same for all children, regardless of age or stage of development, these outcomes may be reached in different ways, according to the individual child. For example, keeping a six month old child safe will have different implications from keeping a six year old child safe.

### **1.5 Would a core set of standards supplemented by service-specific standards overcome these barriers? For example, a modular approach which sets out a common core set on principles, supplemented by specific modules for each service type?**

A core set of standards supplemented by service-specific standards would overcome these barriers to an extent. However, there is the question of which standards would be deemed 'core' standards, and which would be 'non-core' standards. Emphasising some standards over others is inherently problematic in terms of diminishing the relative value of 'non-core' standards.

### **1.6 What other options are there for an integrated set of standards?**

The proposed model should integrate structural and process aspects of quality into a set of national quality standards for children's services. These would underpin an agreed Early Years Learning Framework and would be extended through a quality rating system.

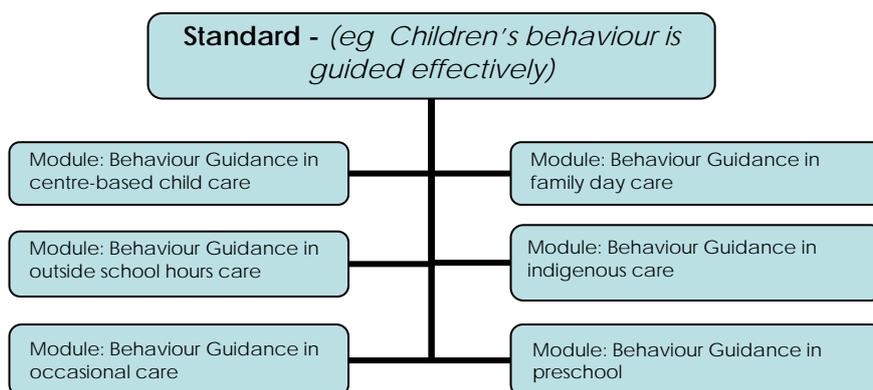
Quality Standards could be developed using the current licensing/national standards and the integrated Child Care Quality Assurance system work completed during 2006/2007 as a starting point.

If this approach is taken the following issues need to be considered to build on these documents:

- Licensing and quality aspects of the standards need to be nationally consistent
- Licensing and quality aspects need to be streamlined and overlaps between Licensing and Quality Assurance need to be minimised
- As staff qualifications, group size and ratios are fundamental to the provision of quality care and education for children, consideration needs to be given to ensuring that the standards set are supported by research. A timeframe for implementing this change and a strategy to address staff shortages and skill upgrading needs to be developed. A well resourced long term plan such as that which has been implemented in New Zealand is recommended.
- Retain the link between Quality Assurance system participation and funding of Child Care Benefit to ensure participation. However, sanctions for non-participation in the integrated licensing and accreditation system need to be reviewed and strengthened to ensure that they can be implemented effectively. It is important that families are not penalised for the non-compliance of services
- Integrate the standards to focus on outcomes for children, ages/stages rather than service type which will allow for the standards to be adaptable to a wide range of services (eg occasional care, in home care, preschool etc)
- Ensure the standards are based on research and are practical
- Ensure standards have face and construct validity (Rowe, K 2006)
- Once developed, the Early Years Learning Framework needs to be linked to the Standards.

A possible model is to have overarching standards that apply to all service types and be based on outcomes for children. A supplementary resource or module which guides the

practice in each service type could help to overcome some of these barriers. For example:



Some items could be placed in an appendix or a supplement to the standards.

To consider how to apply standards to a range of settings it is imperative that significant input from relevant service types be sought as some standards may be hard to apply, or may need to be applied in different ways. For example, in some services, families have limited direct contact with child care professionals as children may be transported to and from the service by bus. This would affect the standards around family partnerships.

An integrated set of standards could assist in improving the professionalism of all child care professionals and provide recognition and careers pathways. It would also recognise the increasing complexity of children's services and the shift in recent years to hybrid child care arrangements (eg school age children attending long day care, family day care services linked to centre based care).

### 1.7 How could the standards take account of the age of children?

The standards must adequately cover all age groups, to ensure that children's specific needs are met, including infants, toddlers, preschoolers and school age children. Child care professionals must have knowledge about child development in order to provide appropriate care and education for individual children.

The desired outcomes for children will be the same regardless of their age, however the way these outcomes will be achieved will vary according to the individual child.

There is an inclination to focus inequitably on the 3-5 year age group in the Discussion Paper.

### 1.8 What are the potential impacts of the introduction of a new set of quality standards on early childhood education and care services? Possible considerations: workforce, financial viability, implementation arrangements, service provision.

#### a. Validity of the standards

Any new standards need to be accepted by those required to implement them. As such, it is recommended that there be extensive, transparent consultation which engages all stakeholders, including service providers, families and children. This will provide the standards with credibility and face validity.

The standards also need to be measured in a meaningful, transparent way. They will need to be reviewed by experts in the profession and sufficiently field tested in services. This will give the standards construct validity.

These standards need to be developed in a way that will allow them to be reviewed and adapted over time. As practice changes, so too should the standard.

#### b. Change strategy

The standards have been in a perpetual state of review for over two years as successive governments seek to put their stamp on child care. This has led to a great deal of confusion and angst among services, families, teachers at TAFEs and Universities, peak bodies, administrators and everyone else involved in the process.

The increased administrative burden and stress placed on services as they adapt to the changing goal posts is real and must be managed appropriately.

NCAC recommends that there be a long lead in time to allow services to adapt to change and to meet the new requirements. It is not fair to set services up to fail.

Government is encouraged to develop a ten year plan for children's services and work proactively with all stakeholders to implement it. This cannot be achieved in election cycles.

This plan should include support for services during the transition period and grandfathering of clauses to allow services time to meet the requirements (incremental expectations).

#### c. Workforce issues

A recruitment and retention strategy for child care professionals will need to be developed and implemented as the current workforce is inadequate to meet current and future demands. Particular attention is needed in rural and remote areas. Financial incentives and improved working conditions may be required to support this. More information is available in the workforce section of this response.

### **1.9 What are the particular issues with changes to the 'iron triangle' structural indicators of quality: staff qualifications, child-to-staff ratios, and group size? Possible considerations: workforce, training, relative costs and benefits of each indicator.**

Staff qualifications, ratios and group size are essential to quality child care provision. There are a number of obstacles to meeting these requirements but these necessities should be part of the long-term vision for children's services in Australia.

There are costs – to the individual obtaining qualifications; to the service paying increased wages to more qualified staff, hiring more staff to meet ratios and possibly amending existing buildings to accommodate new group sizes– and these costs will likely be transferred to parents as fees are unregulated.

Government could subsidise this through initiatives to remove or lessen TAFE/University fees, or through subsidies or incentives to services to recruit better qualified staff.

Services may elect to reduce the number of child care places they offer in order to avoid hiring additional staff to meet more stringent ratios, which could result in workforce issues for families unable to find care. The impact of this could be lessened by government offering a paid parental leave scheme, which would limit the need for increases in the number of staff to care for infants less than one year of age.

Further, the emphasis on qualifications may alienate those child care professionals who, despite not having formal qualifications, have a wealth of knowledge and experience in the child care field. It is important that goodwill be maintained and that these staff and carers are encouraged and supported to obtain the qualifications needed to continue in the profession.

**1.10 What transition arrangements do you consider appropriate for implementing the proposed changes? What timeframe might be required to fully implement all changes? What supports for the early childhood education and care sector do you think would assist these transition arrangements? Possible consideration: professional support program?**

Under the current proposal to integrate licensing and accreditation for child care services, the Federal Government has a potentially unifying role through its responsibility for national accreditation. The COAG process presents an exciting opportunity to engage the States and Territories in a new vision for children's services. However, applying uniform regulations and accreditation standards to services that currently differ widely in curricula and regulations, and that are experiencing severe skilled staff shortages is complex. While the opportunity to implement major change aimed at integrating and strengthening quality service provision for children's services across Australia has never been greater, it will require planned and well supported implementation over time to be successful.

It is suggested that a timetable for implementation be developed that includes a staged approach over time, such as has been implemented in New Zealand. Prior to development and implementation it is suggested that a cost and risk analysis be undertaken.

It is suggested that a transition plan be developed to:

- Determine current system maintenance requirements in terms of accreditation decisions continuing to be made. Probability of two systems operating simultaneously while one system commences the other ends its' operations.
- Consider the current organisations/ structures (NCAC state/territory licensing departments) in place to manage both licensing and quality assurance and develop plans to ensure that current expertise is not lost
- Consider the future role of NCAC – as the body that has administered the quality systems for the past 15 years. NCAC could be re-structured to take on the role of the integrated licensing and accreditation body. A transition plan must also address the implications for NCAC staff of a change of organisational structure – a well co-ordinated plan would eliminate the need for a “wind-up”
- Determine and facilitate change of governance arrangements

Other possible strategies to ease the transition of services through the proposed changes include:

- Delivering presentations at Universities and TAFEs where child-care related qualifications are offered
- Having public information sessions
- Organising for Accreditation/licensing body representatives to attend services/schemes
- Developing a far-reaching communication strategy, including a branding exercise for the new, integrated licensing/accreditation body.
- Ensuring that telephone support, provided by qualified, experienced child care professionals is made easily accessible to services.

Another consideration could be restructuring the current subsidy provision, Child Care Benefit. A criticism of the current structure of fee-related subsidies has been that while the decision to extend subsidies to users of for-profit care was intended to increase diversity and choice for families, in many instances this has actually been restricted, as a significant number of community-based operators have been acquired by corporate child care providers. Consequently, the availability of good quality community-based services is limited in many areas (Brennan, SMH 28/2/08).

Furthermore, while the growth in corporate provision of child care has been praised in terms of introducing new investment into a field that has historically been under-funded (OECD, 2006: 108), there are concerns as to whether there has in fact been a genuine growth in child care services. According to the Australian Institute of Health and Welfare, the private childcare sector grew by approximately 20% between 1997 and 2004, in comparison to an increase of 43% in the community sector over the same period. This data suggests that although major growth in the private sector did occur under the former Labor Government (the number of for-profit child care places increased by 233% between 1991 and 1996), this has not been replicated in recent years under the Howard Government (AIHW, 2005). "The latter period has not been accompanied by particularly strong growth in private provision, rather there has been a consolidation of the market in the hands of fewer players" (Brennan, 2007: 218-219).

Another criticism of the current structure of fee-related subsidies is that decision to abolish operational assistance in favour of fee-related subsidies has meant that the government is subsidizing demand, to the detriment of supply. As Ross Gitten pointed out "The trouble with this... as we learnt to our dismay with the private health insurance tax rebate – is that it allows the supplier to share the subsidy with the customer and encourages prices to escalate" (Sydney Morning Herald, 19/04/08). The implication is that while the rebate may improve affordability in the short term, in the medium to long term, it will actually raise the cost of child care for families.

A further difficulty is that, at present, compliance with the Child Care Quality Assurance Systems is linked to Child Care Benefit funding. This creates difficulties when services are non-compliant (eg obstructionist or of exceedingly poor quality on multiple consecutive occasions). In the past, Government has been reluctant to withdraw Child Care Benefit funding, as this affects parents, leaving limited options available to sanction services.

To address the shortcomings of the current system, it is recommended that the government replaces fee subsidies with greater operational and capital assistance to child care providers. It is envisaged that the objective of containing child care fees for families would be achieved by lowering operational costs for services. This would also improve the ease of applying sanctions to non-compliant services, as families would not be adversely affected by removal of fee subsidies. The government could incorporate operational assistance within a national planning framework to guide the development of new services to ensure that new services are developed in areas where shortages are most pronounced. This funding could also be used as an incentive to services that are achieving well as a 'carrot' as opposed to a 'stick'.

Greater encouragement of employer involvement in the provision of child care is also recommended. A study undertaken using data from the Australian Workplace Industrial Relations Survey found that Australian workplaces with on-site child care had lower rates of absenteeism and higher rates for productivity than workplaces without similar provisions (Brandon and Temple, 2007: 447).

## 2. A Quality Rating System

### 2.1 What do you think should be the objectives for a rating system? Do you agree with the objectives listed in section 6.1.2 (Indicator of service quality, Continuous improvement in the early childhood education and care sector, Information for families and communities)?

The primary objective for the development of a rating system needs to focus first and foremost on outcomes for children, and how the rating system will help to ensure that all children have access to quality programs that are committed to maintaining and improving their standards of care and education on an ongoing basis.

The rating system should provide transparent, easily interpreted information for families about quality child care practice. However, the rating system needs to recognise that different families will have different priorities and requirements of a child care service, and families will require support and encouragement to ask the questions/seek the information that will assist them to identify what they want from a quality child care program. Consideration needs to be given to how families may be able to access information about the rating system and quality child care, as well as about the rating of specific services, for example through a website, certificate/logo/sticker to be displayed (as with ISO certification) that identifies the service's status.

The system should aim to raise families' awareness and appreciation of the importance of quality child care, and support families to understand their rights and responsibilities in relation to their child's care.

In developing a rating system, a key objective needs to be raising the profile of childcare professionals. This in turn will contribute to positive outcomes for children by encouraging workforce retention and supporting continuity of care for children, and promoting a working environment where striving for and achieving quality is recognised, encouraged and appreciated.

### 2.2 Which objective is the most important? For example, is informing parental choice of service the primary objective?

As the NCAC Guiding Principle suggests, 'putting children first' should be the primary objective of any proposed reforms. Accordingly, NCAC considers continuous improvement in the early childhood education and care sector to be the most important objective. 'Parental choice' implies that families must choose between 'good' and 'bad' services. However, to ensure the best outcomes for children, the aim needs to be to ensure that all services offer quality child care and education.

Programs cannot adequately meet the needs of children unless they also recognize the importance of the child's family and develop strategies to work effectively with families. Families represent the most powerful – and the most cost-effective – method for helping children reach their full potential. When children's services work in partnership with families, research shows that:

- Children achieve at higher levels
- Parents become more supportive of their children's learning
- Professionals become more sensitive in their interactions with children

Good early childhood education programs provide opportunities for children to learn while their parents work; but great early childhood education programs extend their educational impact by also strengthening families. Such programs have:

- Welcoming environments that respect and reflect families' values
- Multiple opportunities for families to be drawn into their children's education
- Strong communication systems that support relationship-building with families

Inclusion of family involvement as a key component of a national quality rating system could provide an incentive for programs to evaluate their own practices and develop new ways of connecting with families.

### **2.3 What principles do you think should underpin the design of the rating system?**

The welfare of children needs to be the core, underpinning principle for the design of a rating system. This means that the fundamental expectations of outcomes for children will apply to all service types and for all age groups.

It is essential that the rating system be designed in a way that recognises and responds appropriately to the need for all areas of practice to be of a quality standard. While there may be some elements of practice that may be viewed as 'core practices', the effectiveness of quality core practices may be diminished if practices that are perceived to be more 'peripheral' are poor quality. For example, in a service where staff interactions with children are of a very high quality, but the hygiene practices are poor, the outcomes for children will not be ideal.

The system needs to offer an approach to rating services that is transparent and simple. It should be easy for families and services to understand, while ensuring that positive outcomes for children are promoted.

The rating system will be most productive if conceived in a way that encourages and assists services to make changes and improvements from a strengths based perspective ie. using what is already working well in their service to support development in areas where there are either poor quality practices, or where the service would like to make further improvements to their quality practices.

The rating system needs to advocate the key elements of effective, ongoing improvement which involves:

- regular and continuous reflection on current practice that incorporates feedback from all service stakeholders
- identifying goals for improvement that first and foremost reflect a commitment to promoting positive outcomes for children
- planning for improvements in ways that are tangible, and for which the service can demonstrate clear accountability.

### **2.4 How should services be rated against standards? What should the rating system look like in order to achieve its objectives? Possible considerations: measurement, attainment or other approaches, how the rating system will link to the standards, accreditation and licensing.**

The proposed rating system outlined below is designed to build quality in children's services and encourage and recognise sustained quality improvement. This ratings system has building blocks of Licensing (construct quality); Quality Assurance (process quality); with progression to Innovation and Leadership. These blocks will be built on sustained quality, measured by achievement over time of the standard required for compliance with the standards. The proposed system is structured as shown in Table 1 (below):

**Table 1: Ratings System**

<p><b>Licensing/ National Children's Services Quality System Requirements not met</b></p>	<p><b>No rating</b></p>		
<p><b>Structure</b> (Licensing aspects of National Children's Services Quality System)</p> <ul style="list-style-type: none"> <li>- Core Qualifications</li> <li>- Core ratios</li> <li>- Buildings</li> <li>- Health and Safety</li> <li>- Minimum Resources</li> </ul>	<ul style="list-style-type: none"> <li>- Programming (new)</li> <li>- Policies</li> <li>- National Consistency</li> <li>- Pass/Fail</li> </ul>	<p><b>Level 1</b></p>	
<p><b>Pre-requisite for this level:</b></p> <ul style="list-style-type: none"> <li>- Compliance with Licensing requirements</li> </ul>	<p><b>Process</b> (Quality Assurance aspects of National Children's Services Quality System)</p> <ul style="list-style-type: none"> <li>- Practices</li> <li>- Polices</li> <li>- Interactions</li> <li>- Program – individual child</li> <li>- Parent involvement</li> <li>- Management</li> <li>- Development/ Education needs identified and met</li> </ul>	<ul style="list-style-type: none"> <li>- Culturally appropriate programs</li> <li>- Inclusion of:                             <ul style="list-style-type: none"> <li>o Qualifications/ credentials</li> <li>o Group size/ratios</li> </ul> </li> </ul> <p>Quality Assurance could include levels of Accreditation</p>	<p><b>Level 2</b></p>
<p><b>Pre-requisite for this level:</b></p> <ul style="list-style-type: none"> <li>- Achievement of Accreditation sustained over a number of cycles</li> <li>- Compliance with Licensing requirements</li> </ul>	<p><b>Innovation</b></p> <ul style="list-style-type: none"> <li>- Innovative practice</li> <li>- Community engagement</li> <li>- Partnerships with parents</li> <li>- Linkages with schools</li> </ul>	<ul style="list-style-type: none"> <li>- CALD programs</li> <li>- Research projects</li> <li>- Specialist programs</li> <li>- Integrated centres</li> </ul>	<p><b>Level 3</b></p>
<p><b>Pre-requisite for this level:</b></p> <ul style="list-style-type: none"> <li>- Achievement of Level 3</li> <li>- Achievement of Accreditation sustained over a number of cycles</li> <li>- Compliance with Licensing requirements</li> </ul>	<p><b>Leadership</b></p> <ul style="list-style-type: none"> <li>- Lighthouse services</li> <li>- Acknowledged by field as leader</li> <li>- Drives quality in sector</li> <li>- Student/university links</li> <li>- Mentoring</li> </ul>	<p><b>Level 4</b></p>	

**2.5 What kind of information should the rating system provide to parents and others in the sector? Possible considerations: grades of quality at each level e.g. A—E, incentives for continuous improvement.**

The rating system needs provide a clear 'snapshot' of a service's quality rating for families. However, any information about a service's rating should include information to support families to understand how the rating decision is made, and to talk with services about their current practices and plans to quality improvements.

Families should also be encouraged to use the rating of a service as a general guide, but reminded that they will have their own priorities and needs in relation to their child's care which may not necessarily be reflected in a service's rating.

## **2.6 What potential risks are there in introducing a rating system? How could potential negative implications be minimised?**

A rating system can provide a useful overall 'snapshot' of the quality of service practice. However, it is difficult for a rating subsystem to provide stakeholders with the minutiae that helps them to understand the circumstances or context surrounding a service's practices. In this way, families may take the information provided by a rating system about a service at face value, without investigating further, and so may bypass a service which would suit them.

To overcome this issue it would be beneficial to develop a communication strategy to assist services to communicate effectively with stakeholders about their rating.

When there is a change of management or significant staff turnover, the quality of practices in a service can change dramatically. One way to counteract this would be to devise a policy that requires services that undergo a management change, or significant turnover of staff, to be considered to be a 'new' service, and to start the process of the rating system from the beginning.

## **2.7 Should the rating system include all services in the early childhood education and care sector e.g. long day care, preschool, family day care, outside school hours care, Indigenous services, etc? What are the implications of bringing all service types under one rating system?**

The rating system needs to be flexible enough to recognise that quality outcomes may be achieved by different services in different ways.

Consideration also needs to be given to high quality experiences for all children in early and **middle** child services. Including all services in one rating system may help to overcome the inequity that may exist between different service types, both in terms of how they are generally perceived and valued, as well as in terms of the expectations of the quality of care and education they can or should provide.

Including all service types under one rating system also recognises the fundamental right of every child to receive quality care and education, regardless of the setting/s they use.

However, it is important to work with different service types across the sector to gain their ideas and to develop an understanding of the genuine issues or challenges they may face in participating in a 'one size fits all' rating system.

## **2.8 What are the potential impacts on early childhood education and care services? Possible considerations: workforce, financial viability, implementation arrangements, service provision.**

Child care services have been awaiting changes to the current Child Care Quality Assurance systems for over two years. As result of government changes, anticipated reforms have not taken place according to expected timeframes, and as a result many services are experiencing a strong sense of frustration and fatigue. As a result, services may feel anxious and resentful about the proposed changes, particularly if they have not been adequately consulted about the changes, or they are placed in a position of having to take up a new process within a short timeframe.

Improving staff to child ratios may assist in reducing staff stress levels, which according to anecdotal evidence, is a significant factor in high turnover amongst child care professionals.

The proposed changes may threaten the financial viability of some services due to the increased costs associated with:

- employing more highly qualified, and therefore more highly paid, staff

- employing more staff to cover increased staff-child ratio requirements
- generally improving wages and conditions for staff

In response to these issues, services may increase fees or reduce their services and the number of child places offered, which in turn will affect families by making child care more difficult to access.

Child care services that experience difficulty with the transition to a new system, particularly if this occurs too quickly and/or with too little support, may receive a low rating in the new system and be forced out of the market prematurely.

The nexus between regulation, accreditation and curricula can powerfully influence the quality of children's services. The key is to align content with research and effectively monitor and enforce their application. We need to ensure that consistent standards, both structural and process, are applied to all children's services. As regulations exert an upward influence on quality regardless of service type, all children's services should come within a national quality framework encompassing both regulatory (structure) and accreditation (process) components. This framework needs to incorporate qualifications, staff-child ratios and group sizes recommended by professional organisations, as these are foundational to quality, as well as the process aspects of quality.

## **2.9 What transition arrangements do you consider appropriate for implementing the proposed changes? What supports for the early childhood education and care sector do you think would assist these transitions? What timeframes are required to allow services to make the transition to a new rating system?**

### **Transition arrangements**

The Government needs to adopt a phased approach in recognition that some areas of service delivery are closer to being able to achieve the new level of qualifications requirements than others.

Services should be allowed at least 6 months, without a licensing/accreditation visit, to come to terms with the new standards/framework. This will need to be longer if the changes are more complex

### **Supports**

Professional development and support needs to be provided to assist services to understand new system, standards and early years learning framework.

Professional support services themselves require adequate time to fully comprehend the new system, standards early years learning framework in order to provide effective support and advice.

A strategy/plan needs to be outlined for the development of a range of resources eg self-paced training packages, support documents, DVD etc

It is recommended that mentoring/coaching professionals be employed to assist services over a 3-month period to transition eg Self-study Support Facilitators (or similar role). Services will need 'people' contact to make this transition, not just documents, publications, resources.

## **Timeframes**

There needs to be a long lead time to ensure services have the opportunity to understand the standards, system and early years learning framework. This needs to be a matter of years, as by rushing to bring in change will set services up for failure.

### **3. Streamlined and/or Integrated Licensing and Accreditation Arrangements**

#### **3.1 What are the current issues or problems with the existing regulation, licensing and quality assurance system?**

Some services and families have expressed confusion about what the standards or requirements are, and about who administers these.

Concerns regarding the current model include:

- Regulatory standards administered by State/Territory Governments vary significantly between the jurisdictions; are non-existent for some service types in some jurisdictions; and are not all founded in evidence-based best practice. This is particularly the case in relation to ratios, group size and staff qualifications.
- State/Territory Licensing Departments and NCAC work independently of each other, which may result in services receiving regulatory visits from both at the same time or within a very short timeframe.
- The Child Care Quality Assurance systems have worked well in raising the standard of quality in children's services during the past fifteen years, however, these standards now need to be reviewed and streamlined based on current evidence-based best practice. Overlap between regulation/licensing and the Child Care Quality Assurance standards, while minimal, needs to be addressed and the standards need to be integrated and focused around outcomes for children rather than service type.

#### **3.2 What changes to the structure of the quality assurance system would you suggest to increase consistency, effectiveness and efficiency across service types and/or jurisdictions? How might these changes affect you or your service? Possible considerations: administration, governance and delivery arrangements, reducing administrative duplication.**

A national rating system that encompasses licensing, accreditation and other additional indicators of quality (such as leadership, mentoring, innovation and parent engagement) assist to drive a higher level of quality service provision. Quality rating systems are also used as a strategy for aligning components of the early care and education system for increased accountability in improving quality of care.

A new organisational structure is proposed to manage the implementation of the National Children's Services Quality System and rating system that will deliver quality outcomes for children from birth to school age attending Australian children's services.

The new organisational structure could include two levels of agencies with specific roles and communication requirements:

- National Children's Services Quality Standards Agency
- State/Territory Children's Services Quality Systems Agencies

The proposed structure includes a national organisation that would: manage the setting and publication of standards and A-E rating system; assesses and determine awards under the rating system; determine measurement processes; train assessors (currently Validators and licensing officers) and trainers; manage national data and communication regarding the *National Children's Services Quality System*; and conduct research.

The proposed structure also includes state/territory based organisations that would: administer the *National Children's Services Quality System*, as per standards and protocols set by the National Children's Services Quality Standards Agency; and manage Child

Care Benefit related compliance requirements, as per protocols set by the Australian Government.

There are a variety of governance models that could be explored but the main objective would be to establish a governance structure that in the long term includes a strong partnership and commitment between all States and Territories and the Commonwealth. A National Board comprising State and Commonwealth membership is one such model. The role of sector experts and academics in providing advice on the development and research around quality and standard setting also needs to be considered. This could take the form of a Ministerially appointed Advisory group reporting to the National Board or positions could be incorporated into the National Board.

**3.3 What would be issues for you in moving to a streamlined or integrated system? What supports for the early childhood education and care sector do you think would assist these transitions? How much time should be allowed for the sector to make the transition to the new system? Possible considerations: implementation arrangements, service provision**

Over the past fifteen years NCAC has successfully implemented changes to the quality assurance systems and is staffed by experts who can facilitate any transition.

See also previous comments relating to transition arrangements for a new system.

## 4. Workforce

### 4.1 How could the status and recognition of the early childhood education and child care workforce be raised?

The following factors are considered instrumental in determining the level of status and recognition attributed to child care professionals:

- Remuneration
- Training and qualifications
- Experience and continuity of staff
- Professionalising the workforce
- Public awareness campaign

#### a. Remuneration

One of the most important issues in addressing the status and recognition of child care professionals is remuneration. The average income for a full-time early childhood Diploma-holder is currently \$37,500, while child care teachers earn 25% less than primary school teachers<sup>1</sup>. This issue was addressed by the Senate Community Affairs Committee into Childcare Funding in 1998, which found that "*child care workers are amongst the lowest paid children services staff in the country given the nature and responsibility of their work*".<sup>2</sup> The pay and conditions of the early childhood workforce need to be commensurate with their skills, roles and responsibilities, and the value to society of high quality early childhood services.

The Government must consider providing more operational funding to child care services to meet increased wage costs, in order to ensure that consequential fee increases are not cost prohibitive for families.

#### b. Training and Qualifications

The issue of training and qualifications needs to be addressed at two levels. The first relates to attracting new graduates to the child care field. To pursue this aim, it is recommended that the Government funds a marketing initiative in schools, universities and TAFEs to espouse the benefits of the child care profession. This could include advertising in Graduate Guides, providing promotional material to careers advisers, holding stalls at careers fairs etc.

The second relates to up-skilling child care professionals currently employed in child care services. NCAC considers the Government's proposal to introduce a national mandatory minimum requirement for care professionals to be an important step towards enhancing the status and recognition of child care professionals.

There needs to be formal recognition of the skills of the existing child care workforce. To this end, the Government must establish a nationally coordinated program of Recognition of Prior Learning that has occurred outside formal education and training.

There also needs to be encouragement and additional funding for staff to obtain further qualifications as part of ongoing professional development.

#### c. Experience and continuity of staff

At present, there is a high level of turnover within the child care workforce. The loss of experienced professional exiting the child care field, combined with pre-existing staff shortages, means that there are distinct gaps in the level of professional experience exhibited throughout the sector.

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<sup>1</sup> LHMU (2008) Big Steps in Childcare, the LHMU, Sydney

<sup>2</sup> Parliament of Australia (1998) Senate Community Affairs Committee into Child Care Funding, chapter 6.

There is a significant body of research which highlights the importance of the amount of time a primary carer has to develop individual relationships with each child and the stability of these relationships over time. Improving staff continuity has additional benefits associated with reducing hiring and training costs for services. Retention strategies are needed to minimise the loss of child care experience associated with high staff turnover.

#### **d. Professionalising the workforce**

Another important step towards enhancing the status and recognition of the child care workforce involves raising the professional standing of the child care sector. A national system of registration could be introduced in pursuit of this objective. Registration of child care professionals could assist in ensuring that a high standard of practice and conduct is maintained. Such a system could mirror the current state/territory requirements for teachers to be registered by setting out specific registration and post registration training requirements. The system could be structured according to different categories of registration, including provisional and full registration. Provisional registration could entail a supported introduction to the early childhood profession, characterised by:

- Child care experience
- Guided reflection on practice
- Professional development and growth
- Collegial support and participation in collegial activities

Full registration could require successful demonstration of professional standards, subject to suitability requirements, such as criminal checks etc. Having a national system of registration would permit transferability of skills/qualifications across states/territories.

Another strategy to professionalise the child care workforce could be to establish a Code of Practice/Professional Conduct for child care professionals. Professional standards could assist to clarify expectations of practice within the child care profession, and offer guidance to members of the profession seeking to improve their professional practice through self-reflection and professional development. Professional standards could also assist in increasing public recognition of the quality of the profession and understanding of the complexity of the work undertaken by child care professionals. The Government could consider instituting a Professional Practice and Conduct Committee to oversee applications and deal with disciplinary matters. This Committee could be given powers to investigate alleged breaches of Professional Conduct.

#### **e. Public awareness campaign**

Another strategy for raising the status and recognition of the early childhood education and child care workforce could include a public awareness campaign that highlights the importance of the early years environment for children's development, thereby illustrating the value and competence of child care professionals working with young children. A marketing strategy needs to be accompanied by the adoption of a more professional language and culture within the field, which more accurately captures the professional capabilities of the early childhood workforce, such as referring to the workforce as 'child care professionals', as opposed to 'child carers' or 'child minders'.

Formal recognition and acknowledgement of the value of early childhood education and care would be aided by moving early childhood education and child care under the education portfolio of State/Territory Departments, to mirror the transition of early childhood from FaCSIA<sup>3</sup> to DEEWR<sup>4</sup>.

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<sup>3</sup> Department of Families, Community Services and Indigenous Affairs

<sup>4</sup> Department of Education, Employment and Workplace Relations

## 4.2 What could be done to address limited advancement options and career paths?

### a. Professional Development

In order to address limited advancement options and career paths, the child care sector as a whole needs to explore new opportunities for professional development, through a variety of pathways, to create a genuine career structure. This includes developing support services to assist current and prospective child care professionals to make informed career choices, and to highlight the range of career options available to them. In particular, the sector needs to ensure that there are opportunities for progression for childcare professionals who aspire to leadership or management positions. Provisions also need to be made to ensure the accessibility of professional development opportunities for people in rural and remote areas.

There needs to be a coordinated and integrated approach between all training, in-service and higher education providers. In particular, the Government needs to establish collaborative partnerships between VET institutions and the University sector to develop new ways of thinking regarding qualification pathways and curriculum design. There also needs to be flexibility of course structure, including ongoing monitoring and evaluation, to ensure that it is continuously responsive to changing community needs.

It is recommended that the Government proceeds with proposals to establish new places and abolish TAFE and university fees for child care professionals, while ever there are chronic staff shortages.

### b. Resources for Child Care Professionals

The government could consider developing a resource, such as a toolkit, to support understanding of progression routes for child care professionals. It is also recommended that the Government establishes a career search facility or a professional service to match child care professionals with areas of staff shortages.

### c. Consultative Roles

There should also be consideration given to developing and expanding consultative roles, so that experienced child care professionals can share their practical experience and knowledge with other services.

## 4.3 What possible approaches could be used to improve retention strategies?

### a. Working Conditions

As mentioned previously, improving remuneration is essential in terms of improving retention levels. It is also important to improve the working conditions, which are typically characterised by high stress levels owing to inadequate staff to child ratios, long working hours and unpaid overtime, and high levels of responsibility and accountability on a daily basis. It is recommended that the Government proceeds with proposals to improve minimum ratios, particularly within the 0-2 year age group.

There also needs to be funding allocated for counselling and other support service for child care professionals to combat 'burn out' within the industry. Some other strategies for improving working conditions include:

- Paid maternity leave
- Greater travel opportunities
- Greater incentives/fringe benefits
- Greater professional recognition
- Free/tax deductible professional development
- Free first aid certification
- External study support
- Free immunisation

## **b. Offering Incentives**

A key strategy for improving the job satisfaction of child care professionals is greater recognition of quality work. It is recommended that the new child quality standards incorporate incentives for quality child care provision, as opposed to purely punitive measures for failure to meet the Accreditation standards. It is envisaged that receipt of incentive-based rewards would significantly boost staff morale within child care services, and encourage them to remain in the sector.

## **c. Teacher Recognition Program**

The Government could consider rolling out a national 'teacher recognition program', which would allow registered teachers interested in working in the child care field to fast-track their attainment of child care qualifications by gaining credits for their existing qualifications and experience. The Queensland Government introduced a strategy of this nature in 2004 in collaboration with the Board of Teacher Registration, the Department of Employment and Training, the Crèche and Kindergarten Association of Queensland, the Queensland College of Teachers (QCT) and TAFE Queensland. The strategy incorporates an extensive skills matching and audit process.<sup>5</sup>

## **d. 'Reconnect' Program**

The Government could also consider establishing a 'reconnect' program to encourage child care professionals who have left the field due to family or other commitments to 're-connect' once their circumstances have change. This would minimise the loss of valuable skills and experience.

## **e. Delayed Retirement Incentives**

Offering incentives for child care professionals to delay their retirement, through tax incentives or by other means, may also assist in improving retention strategies.

## **f. Consultative Roles**

Another strategy may be to develop consultative roles for mature child care workers, who may no longer be able to perform the physically demanding aspects of the job, but whose knowledge and experience within the profession are an invaluable resource.

## **g. More contact hours for Directors**

Centralising the administrative requirements of licensing and Accreditation standards may mean that Directors of Child Care centres are able to spend more contact hours with the children, rather than spending the bulk of their time performing administrative duties.

## **h. Improving awareness of the rights of employees within the workplace**

There needs to greater awareness amongst child care professionals or their rights and responsibilities within the workplace, and of avenues for ensuring that employers fulfil their obligations to staff. This includes introducing more stringent provisions to ensure that child care professionals are properly remunerated for overtime work.

There also needs to be a re-evaluation of junior wages for child care professionals who undertake the same type of the work as their adult counterparts. At present, it is possible for students who leave school in Year 10 to undertake a TAFE qualification at age 16, meaning that there is the possibility of commencing work as a qualified staff member at age 18, with all the responsibility and accountability that a qualified position entails, while still receiving a junior wage below that of the minimum adult wage.<sup>6</sup>

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[http://www.trainandemploy.qld.gov.au/partners/fact\\_sheets\\_and\\_resources/factsheets/child\\_care/teacher\\_recog.html](http://www.trainandemploy.qld.gov.au/partners/fact_sheets_and_resources/factsheets/child_care/teacher_recog.html)

<sup>6</sup> Simms, M. (2002). 'Junior pay, senior responsibilities: The experience of junior child care workers'. *Australian Journal of Early Childhood*. Volume 27, No 3.

#### **4.4 What strategies could be adopted to increase the numbers of Indigenous child care workers and teachers?**

One strategy for increasing the number of Indigenous child care workers and teachers, could be to develop training and support programs that acknowledge cultural differences and seek to incorporate these into service delivery, by taking into account individual community needs. Consulting local communities about their individual needs is an integral part of this process. Training needs to be delivered in such a way as to empower and up-skill community members, allowing them to continue to train others.

#### **4.5 What is the likely impact of any suggestions on the price of and demand for services?**

It is likely that both the price and demand of services will increase, which may make the cost of childcare prohibitive for some families. It is advised that the government absorbs some of the costs associated with up-skilling child care professionals. The Government's suggestion that child care services can lift qualifications/ratios without a corresponding increase in fees is unfeasible.

Given the recent growth in birth rates, it is likely that demand for child care services will continue escalate in the near future. It is recommended that government introduces 12 months paid maternity leave. This would alleviate some of the pressure of child care services catering for babies, which is the most costly type of child care to deliver.

#### **4.6 What possible approaches could be used to address shortages of early childhood teachers in regional and remote areas, long day care services and community preschools?**

##### **a. Rural placements**

The government could adopt a similar approach to that employed by the public health system in relation to rural and remote work placements. Students could also undertake practicum in rural and remote areas during study periods. Consideration needs to be given to adequate timeframes to ensure that participants are properly integrated and accustomed the local community before moving on. Participants may find that they are extremely welcome and valued, and may be encouraged to stay. There would also be greater awareness of the unique needs of rural and remote areas, and the potential for knowledge sharing between rural and urban children's' services.

##### **b. Relocation packages**

Another approach to addressing rural and remote shortages would be to offer more attractive remuneration packages and benefits, such as providing accommodation allowances or subsidised transport. For example, the NSW public health system currently offers Rural Area Housing and Remote Area Energy benefits to health professionals undertaking rural and remote placements.

##### **c. Marketing Campaign**

The Government could consider funding, in conjunction with local governments, a marketing campaign which espouses the lifestyle benefits of rural living. A marketing campaign which encourages men to enter the child care profession could also assist in alleviating child care shortages in rural and remote areas.

##### **d. TAFE/University Places in Rural and Remote Areas**

The Government should also consider funding additional places for child care qualifications in geographic locations where child care shortages are chronic.

#### **e. Outreach Programs**

The Government could consider funding outreach programs, based on a 'hubs and spokes' model, whereby rural training facilities establish urban linkages and affiliations. In accordance with this model, specialists within the child care field could visit rural areas several times throughout the year to offer training and support services, supplemented by knowledge sharing/communications via the internet.

## 5. National Early Years Learning Framework

### 5.1 What philosophy would you want an Australian framework to use? (eg. would it focus on ages and stages of development; a socio cultural approach; or domains of learning eg physical, social, emotional and cognitive?)

A socio cultural approach is the most appropriate as it reflects current understandings about early childhood learning and development. A socio cultural approach also considers the development of the 'whole child', meaning that it encompasses the importance of learning across all areas, but views the domains as interrelated, rather than as separate entities.

The framework, in adopting a socio cultural approach, would recognise that:

- Children build knowledge through their interactions with others, including peers and adults;
- Children learn through play, and adults have an important role in facilitating play, and in providing environments and resources that support children to learn through their play;
- 'Adults who provide support and guidance can create a scaffold for the child and move him to a higher level of cognitive development' (Sluss, 2005);
- Children are competent and capable, and that adopting a strengths-based approach, rather than being deficit focussed, is more productive;
- What is happening for the child in the 'here and now', rather than placing an excessive focus on the future, is what's important. While developing foundation skills are important for preparing children for the future life course, this should not take precedent over valuing their experiences, interests and achievements in the present; and
- Continuity of children's experience across the home, early childhood and school settings is integral in terms of cumulative learning.

### 5.2 What form or format should the Early Years Learning Framework take that would be most useful to you in guiding your programming for young children?

Implementing a broad framework would increase opportunities for implementation in a range of different child care settings.

While remaining quite broad, there needs to be enough detail, and specific information to guide services in implementing the framework properly. Case studies or scenarios could be used to support child care professionals to understand how the framework may guide practice in services.

Including reflective questions would also be helpful for guiding child care professionals to understand how the framework may be incorporated into their daily practice. The *NSW Curriculum Framework for Children's Services* and *The Curriculum Whariki for New Zealand's Children* provide good examples of using case studies and/or reflective questions to support the implementation of the content of their curricula. See 'References' at end of document for details.

The framework needs to provide information in a 'top down' approach so that it broadly identifies the core outcomes that are expected for all children in child care, and then describes how these outcomes can be promoted through daily practice. Case studies, reflective questions, suggested exercises or quotes from child care

professionals could be included to assist child care professionals to understand how the outcomes could be promoted or reflected in their specific service context.

### **5.3 How prescriptive do you think the Early Years Learning Framework needs to be? Do you have a preference for the actual length of the Framework?**

The basis of the framework needs to be very prescriptive in outlining what is known to constitute the best outcomes for children. However, it also needs to offer opportunities and support for individual child care services to encourage positive outcomes for children in ways that reflect the individual interests and circumstances of children, families and the service's community context.

While it is important to keep the document as succinct and user friendly as possible, it would be counter productive to make the size of the document the primary consideration in determining what is included in it. If necessary, consider developing a full version, and an abridged version for easy reference, similar to the *NSW Curriculum Framework for Children's Services*.

The framework should provide child care professionals with a clear point of reference for the development of their service's philosophy, policies and procedures to ensure these contribute to positive outcomes for children.

### **5.4 What type of supporting documents/resources would be most valuable for parents and others working with young children (e.g. family day carers, playgroups)? Do you have any views on the format and size of such documents?**

- a) Print and web based resources. Consider developing a website that is specifically devoted to providing resources and information about the framework and its implementation. This could include training resources, links to other relevant websites, regular updates with tips and frequently asked questions. It would be valuable to provide some support options for individuals who have limited English or literacy skills, for example through translations and audio information.
- b) Develop a video to support implementation of the framework.
- c) Use simple language and avoid jargon; make language consistently about outcomes for children.
- d) Develop self-paced learning packages.
- e) Produce a regular bulletin/newsletter to support the implementation / understanding of the framework. This could also be made electronically available.
- f) Where possible, develop resources in ways that will make it easy to adapt them into formats that will increase accessibility for people with diverse language and literacy needs.

### **5.5 Do you see any issues with the implementation of the Early Years Learning Framework in all education and care settings from July 2009? What suggestions would you offer to overcome these issues?**

In order to ensure that the framework actually influences practice, it must be acceptable to, and taken up by, child care practitioners. Therefore, a long lead time for training and understanding the framework is essential.

Some services will need support/professional development to assist them in understanding how the overarching concepts in the framework can be realised in daily practice.

Encourage the integration of the framework in services in ways that assist them to first recognise how they may *already* fit into the framework's parameters, and to use this as a base to examine other areas of their practice.

As soon as possible, encourage training institutions for child care professionals to include information about the framework in their coursework.

#### **5.6 Is the analysis of the trends in the literature accurate and comprehensive? Are there any issues in the research relevant to the development of the framework?**

Generally, the research analysis appears to be comprehensive. An area that needs to be covered more comprehensively is consistency of care for children. While the significance of this issue may be inferred from the discussion paper section entitled *10.3.2 Engaging, responsive and reciprocal relationships*, a clearer link between the consistent care givers and secure attachments needs to be articulated.

#### **5.7 Do you support a focus on language and communication development, social development and play-based learning in the framework?**

The emphasis should be placed upon play-based learning, with a view to children developing language, communication and social skills within a play and interests centred curriculum.

#### **5.8 How would you define the roles of the educator and the child in the learning process in the framework?**

Children and adults need to engage in collaborative learning experiences, where educators are guided by children's interests, communications and explorations. By knowing children, interacting with them, and observing them, child care professionals can support children to 'learn to learn'. Educators and children need to interchange between passive and active roles according what is happening in every learning experience.

The relationship between children and educators should essentially be one of partnership and respect; children should be active contributors and planners in what is happening in their experiences and learning.

There needs to be recognition that families perform the primary role in raising children, and therefore must be actively engaged by early childhood services to support children's learning and development.

#### **5.9 What would you want included in the framework's vision for early learning and children?**

The framework needs to identify the inherent value of the learning that occurs in the early years, and stress the importance of understanding and supporting children's development within the context of their individual culture. This means taking into account every aspect of what makes up the whole child, including their age, interests, strengths, family and community background, as well as their disposition and past experiences.

The concept of the child in the framework should recognise that every child is a competent and capable learner, and that they have a great deal to offer toward their own educative experiences.

The value of learning *how* to learn, and becoming confident in doing this should be emphasised.

A strong focus on learning through play, and on the value of spontaneous and routine experiences should be evident throughout the framework. Children learn best when the relationships between themselves and their peers and adults are actively used to engage children's curiosity and natural desire to experiment, explore and discover.

While the provision of carefully selected, open-ended resources is an important aspect of positive early learning experiences, resources and materials on their own will not support children's learning if they are not provided in thoughtful ways by adults, and complemented by quality interactions with children.

#### **5.10 Would you support the values and rights proposed to underpin the framework?**

The values and rights outlined in the Discussion Paper are valid and appropriate.

#### **5.11 What other values and rights would you want included and why?**

It is suggested that an additional right be included stating that: *Children are valued for who they are in the present, and for what they are achieving in the 'here and now'*. This is important, as it demonstrates respect for the child, and reduces the tendency to focus on what will happen, rather than what is happening now. Children should have opportunities to enjoy their achievements and experiences for the sake of these, rather than for what these may mean in the future.

#### **5.12 How should the curriculum framework provide guidance and strategies to meet the various learning and development needs of the children including those with special needs, English as a second language and/or challenging behaviours?**

The framework needs to emphasise that every child has individual needs, and which may include what are often referred to as 'special needs' or 'additional needs'. These may include children with disabilities, with specific health requirements, with challenging behaviour and children who have English as a second language.

The underlying philosophy of the framework should make it equally applicable to all children, in all child care services with all child care professionals.

Support for child care professionals to ensure inclusion of children with special needs could be built into the general support strategies, such as the case studies and/or reflective questions referred to in the previous response to *EYLF1 - Purpose of the framework*.

#### **5.13 Is it appropriate for children's learning to be assessed? If yes, how should children's learning and development outcomes be assessed?**

The conventional notion of 'assessment' would contravene the key underpinning of the framework, which recognises that children develop and learn in individual ways, dependant on a range of variables including their individual interests and disposition, their past experiences and their social and cultural background. A formal, school

style of assessment, where children are judged in comparison to peers would not be appropriate for quality early child hood settings.

Current best practice in child care settings requires child care professionals to monitor and document aspects of children's experiences, learning and development, and to ensure that this information is shared with the child's family as well as with colleagues and other professionals where relevant. In quality child care settings this information is also used by child care professionals to inform planning for children, to ensure that the experiences and environments provided for them are relevant, and build upon their current strengths and skills.

#### **5.14 How would you ensure the curriculum framework is appropriate for all educators, regardless of qualifications?**

Regardless of their qualifications, it would be beneficial for all stakeholders to have access to a document that is clearly set out, and that uses plain, non jargon language. This will also be advantageous in that it will make the information outlined in the document more accessible to individuals with particular language or literacy needs. It is also likely to make the document itself more easily adaptable into an accessible format, for example through translation or audio recording.

#### **5.15 What kind of professional development will need to be provided in order to support educators in using an Early Years Learning Framework?**

Web based resources, information and online training modules would be a particularly useful way to inform and train child care professionals in the implementation of the framework. This would be a relatively cost effective option, and will be widely accessible to services, as all services are now required to have access to the internet in order to administer the Child care Management System.

Other options include:

- Developing resources/support publications such as factsheets, newsletters, and information sheets.
- Developing self paced learning packages that services could purchase and use as part of their in-house training programs.
- Encouraging training/education institutions to incorporate training about the framework into their course structure.
- Providing opportunities/incentives for services to build support networks with other services through mentoring projects. In rural and remote services this could be achieved through internet support.
- Ensuring that the development and implementation of the framework is well publicised and actively communicated to the sector to promote and understanding of the rationale and context for the framework.

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