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NCAC Response to the Report of the Expert Advisory Panel on Quality Early Childhood Education and Care

For the past 16 years, 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 the following Child Care Quality Assurance (CCQA) systems:

- Quality Improvement and Accreditation System (QIAS) for long day care centres
- Family Day Care Quality Assurance (FDCQA) for family day care schemes
- Outside School Hours Care Quality Assurance (OSHCQA) for outside school hours care services

The following submission has been prepared in response to the Report of the Expert Advisory Panel on Quality Early Childhood Education and Care: 'Towards a national quality framework for early childhood education and care.'

NCAC extends its general support for the Panel's vision for quality early childhood education and care in Australia. However, we would also like to take this opportunity to address some aspects of the Report where NCAC's position diverges from the Panel's findings and recommendations.

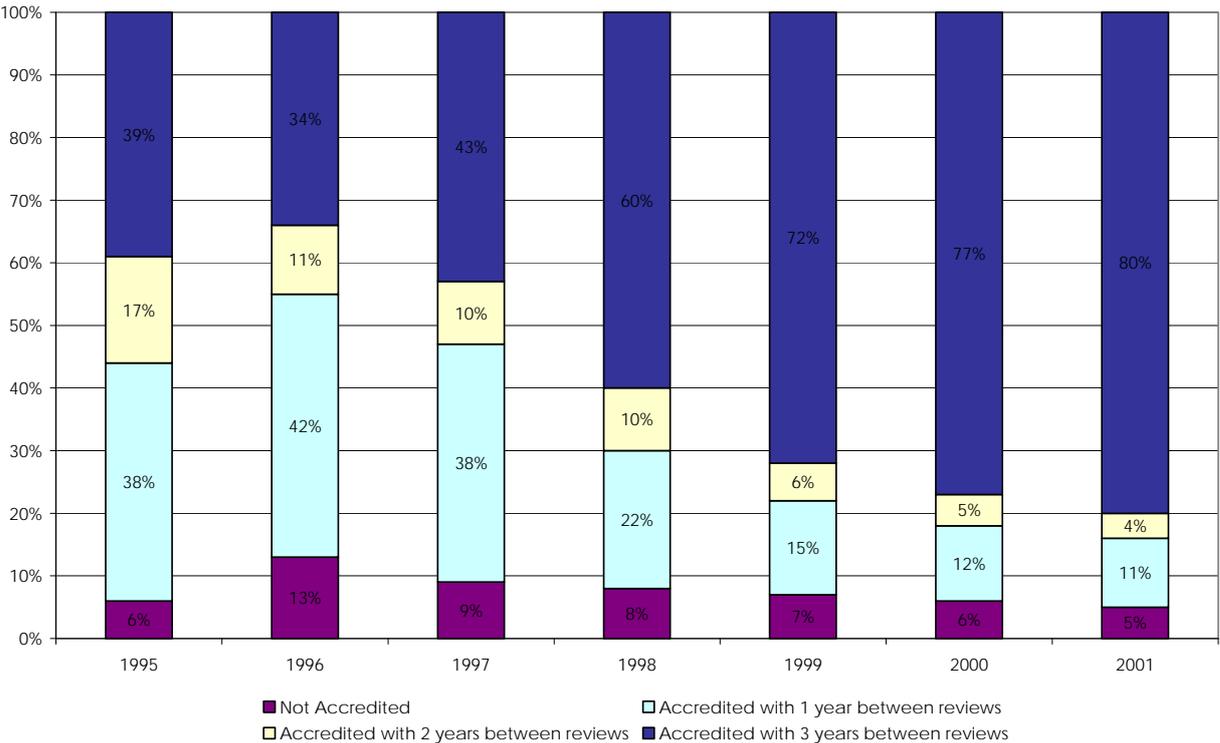
NCAC notes that the Panel's calls for a 'systemised approach' to 'support continuous improvement for all services, not just to achieve agreed standards, but to exceed them' (p28) is already embedded in the current CCQA processes.

At present, the CCQA systems require services to reflect on their current practices when submitting their *Self-study Report*, and to provide a *Continuing Improvement Plan*. Additionally, NCAC Moderators provide services with a *Continuing Improvement Guide* accompanying their Accreditation Decision, which outlines guidance points and recommended resources to assist services to build on their plans for continuing improvement. Validators also assess services' progress towards continuing improvement when undertaking periodic Spot Checks.

Whilst acknowledging that ongoing improvements to the quality of care provided for children should continue to be the foremost priority of any National Quality Framework, NCAC contends that 'continuous improvement at a service level' has already driven up 'the benchmark of the entire industry over time' (p28).

NCAC also notes that the 'recent trend data from the NCAC' which has been taken to indicate that 'the percentage of centres listed as accredited has dropped over the last three years' (p28) should be viewed in the context of the reclassification of QIAS standards, which came into effect in 2005. This reclassification raised the benchmark which services are required to meet in order to become Accredited, and while there was some initial decline in proportion of Accredited long day care centres, this trend was reversed following a period of renewed improvement, as indicated by the following data.

The graph below demonstrates the progress of long day care centres participating in the QIAS from 30 June 1995 – 30 June 2001:



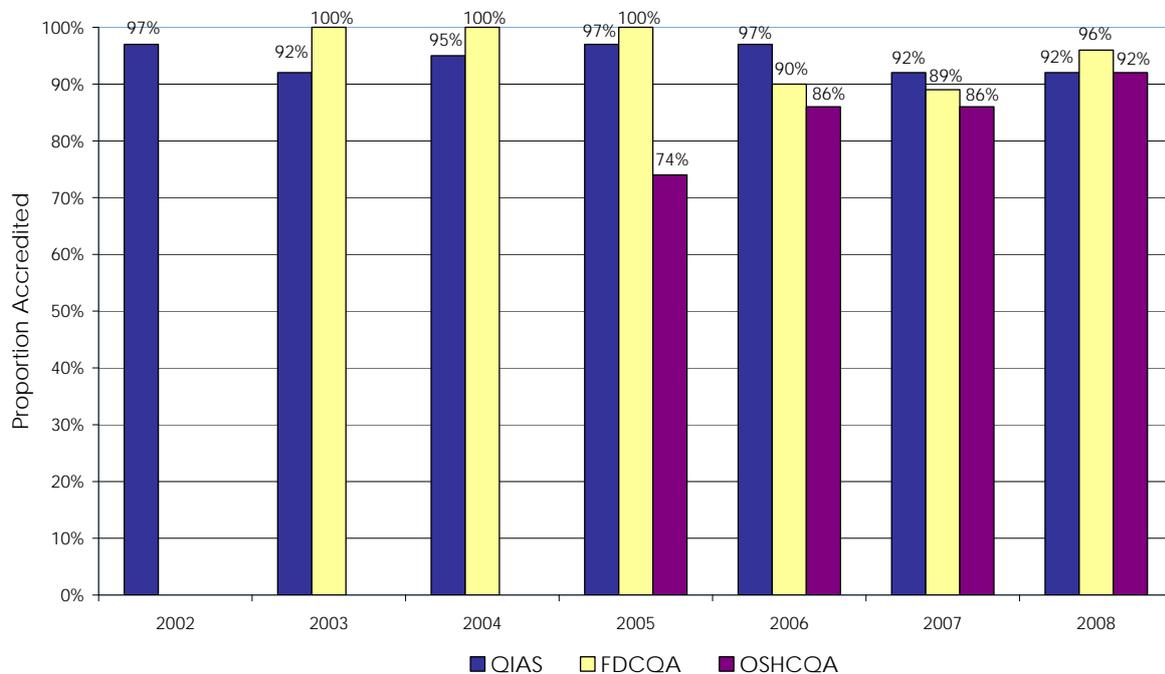
Of notable significance is the increase in the proportion of services Accredited with 3 years between reviews, and the decline in the proportion of Not Accredited services.

There have been a number of key developments in the administration of the CCQA systems since 2001:

- A standard period of Accreditation (two and a half years) was introduced for all Accredited services from 2002
- Family Day Care Quality Assurance (FDCQA) was launched in 2001, with the first Accreditation Decisions being made in 2003
- Outside School Hours Care Quality Assurance (OSHCQA) was launched in 2003, with the first Accreditation Decisions being made in 2005.

The graph below demonstrates the progress of long day care centres, family day care schemes and outside school hours services care participating in the CCQA systems from 30 June 2002 - 30 June 2008:

Progress statistics for long day care (QIAS), family day care (FDCQA) and outside school hours care (OSHCQA)



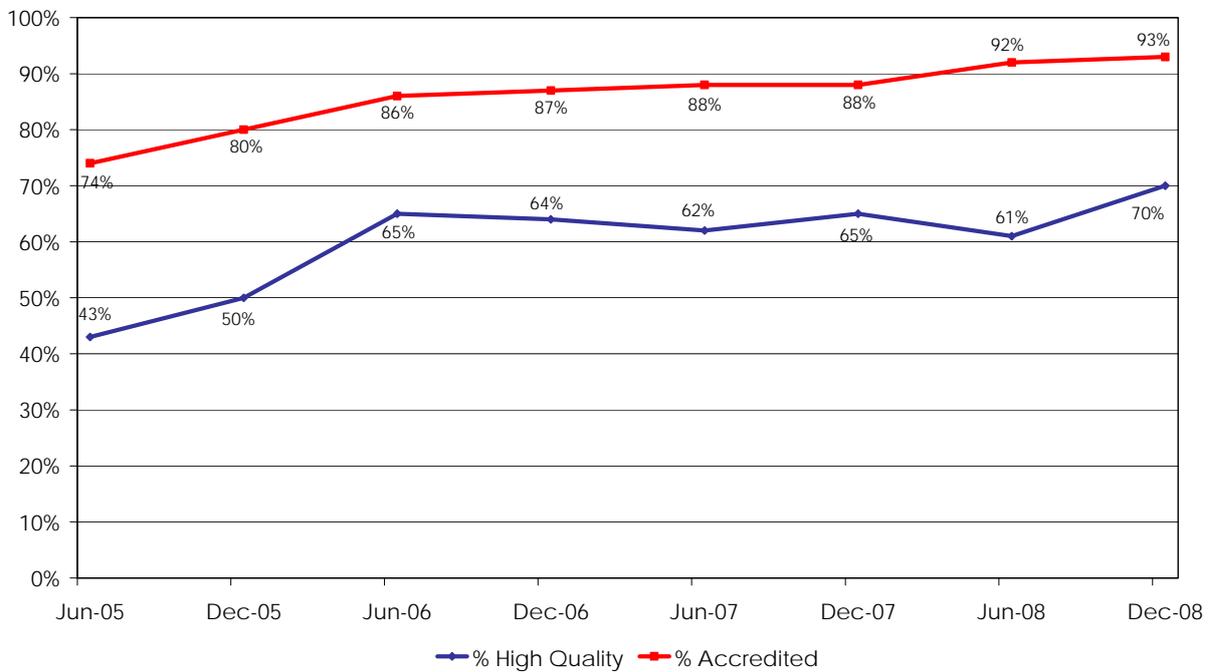
As was previously mentioned, variations in the proportion of Accredited services are largely attributable to the reclassification of standards, which raised the benchmark that services are required to meet in order to achieve Accreditation:

- The first FDCQA Accreditation Decisions made under reclassified standards (outlined in *FDCQA Quality Practices Guide*, 2nd edition 2004) were made in 2005
- The first QIAS Accreditation Decisions were made under the reclassified standards (outlined in *QIAS Quality Practices Guide*, 1st Edition 2001) were made in 2006.

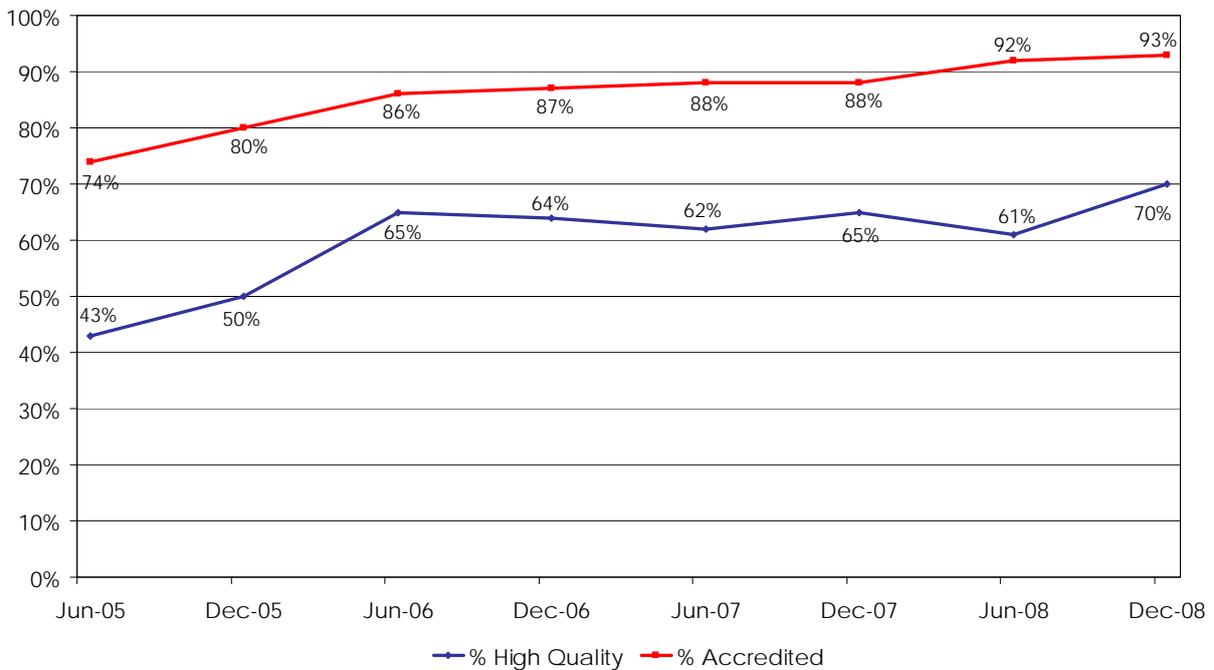
Variations may also be attributed to the introduction of Unannounced Validation Visits in 2006, and enhanced consistency amongst Validators following transition from Peer Validators to Staff Validators from 1 July 2006.

Evidence of continuous improvement is also illustrated by the following graphs, which demonstrate the proportion of services that achieved High Quality ratings across all Quality Areas for the period 30 June 2005 – 31 December 2008:

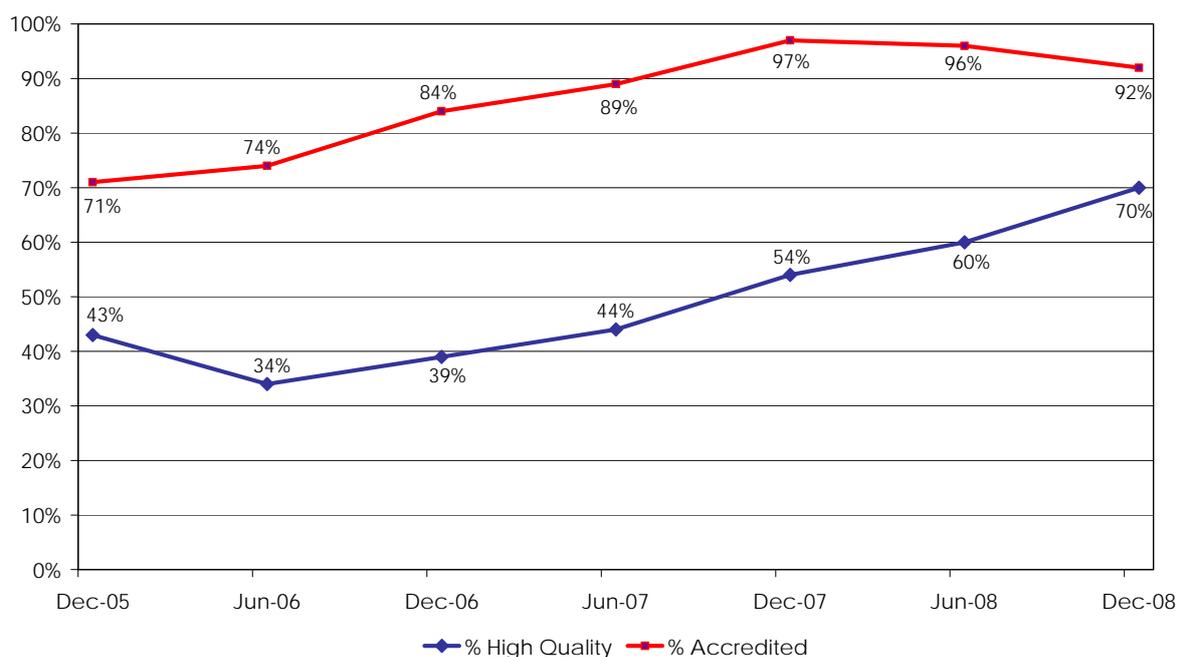
Progress statistics for long day care (QIAS)



Progress statistics for family day care (FDCQA)



Progress statistics for outside school hours care (OSCHQA)



Support for the Validation Process

Ongoing analysis of *Validation Evaluation Forms* submitted by services that have received a Validation Visit indicate their continued satisfaction with the Validation process. On average during 2003-2008, over a range of measures of the Validator's performance, more than 90% of child care services indicated that they were satisfied with the completion of their Validation Visit.¹

NCAC believes that the reforms proposed by Government to integrate and strengthen quality service provision for children's services across Australia represent an exciting opportunity to extend on the achievements of the CCQA systems by continuing to deliver improved outcomes for children, families and communities.

¹ *Validation Evaluation Form Analysis Reports* for the period 2003-2008 are available from the NCAC website: http://www.ncac.gov.au/reports_statistics/past_reports.asp#vef

Context for a Quality Framework

NCAC supports the Expert Advisory Panel's comments regarding the value of high quality early childhood education and care towards enhancing children's learning and development. NCAC joins the Expert Advisory Panel in calling for additional funding for early childhood education and care, in recognition that Australia's investment in this area is relatively low by international standards, and that any increases in funding are likely to yield strong dividends in the future that far outweigh immediate outlays.

NCAC's also supports the Panel's assertion that quality early childhood education and care is particularly vital for vulnerable and disadvantaged children, who stand to benefit most from this type of care. Quality child care has additional benefits in terms of identifying developmental delays and organising relevant interventions.

NCAC commends the Panel's comments regarding the ineffective and counterproductive approach of allowing the market to regulate supply, 'in a market place with limited choice, combined with the imperative for stability in a child's (early childhood education and care)' (p6).

In response to the Panel's claims that paying fee subsidies directly to parents has 'weakened the steering capacity of governments', NCAC recommends that the government should replace current fee-relief subsidies with greater operational and capital assistance to child care providers. This would 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.

While NCAC supports consultative policy making and management, NCAC believes that participatory and voluntary approaches to quality provision (p6) do not represent the best way forward. Australia has been a world leader in developing the first quality assurance systems for child care services to be linked to funding through legislative requirements. The impetus for this link has been to create quality outcomes for all children and equitable access to quality child care services for all families. NCAC is concerned that voluntary participation of child care services in quality assurance systems would undermine these aims.

A National Quality Framework for Early Childhood Education and Care

NCAC extends its broad support for the Panel's vision for the National Quality Framework for Early Childhood Education and Care, particularly the focus on children as being at the centre of policy development and service delivery (p11).

An integrated system of licensing, regulation and accreditation

As the Panel noted, the complexity of the current regulatory arrangements has resulted in overlaps, gaps and inconsistencies (p8). There is often confusion for both services and families about which matters are within the licensing province and which are NCAC responsibilities.

There is also an assumption in the wider community that all settings in which children are provided with care and education are regulated in some way, when this is not

the case. Currently a centre based service may offer long day care, a state funded preschool program and care for school age children. Families may assume that when the service is Accredited all of these components have met the quality assurance standards when in fact the Accreditation Decision relates only to the long day care places.

In some states and territories family day care schemes and outside school hours care services are not licensed and the quality assurance systems provide the only means of addressing basic health and safety aspects of service delivery in those jurisdictions. The *Quality Trends Reports* produced by NCAC indicate that there has been a significant increase in the quality of care provided by family day care schemes and outside school hours care services since the introduction of quality assurance in these sectors. However, health and safety issues continue to be the major reason for services receiving a Not Accredited Decision. An integrated system of licensing and accreditation arrangements that captures the full range of services and programs provided for young children (including those not currently covered by licensing/accreditation such as preschools, occasional care etc) will:

- provide a more consistent national approach to quality in children's services
- allow families and the wider community to have greater confidence in the quality of care and education being provided
- assist families to make an informed decision about using a particular service or program
- ensure greater compliance with health and safety standards.

Further more, State/Territory Licensing Departments and NCAC currently 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. This contributes to a perception that there is a great deal of duplication and overlap between regulations and the CCQA standards, when in reality it is minimal, as the following example illustrates:

Both regulations and the CCQA standards require a service operator to develop a suite of policies and procedures but the focus of this requirement is quite different. The regulations require the policies as a condition for a licence to be granted. In line with best practice, the CCQA standards require that policies are based on recommendations from recognised authorities and to take into account the needs of individual children and their families using the service. The CCQA standards also require services to regularly review and update their policies in consultation with families and staff. In this way the CCQA standards go beyond a single requirement to have policies in place, and contribute to them becoming living and meaningful documents which guide service practice and encourage continuous improvement.

Streamlining the administrative and compliance processes through an integrated approach to licensing and accreditation would, as the Panel suggests, reduce the workload for educators and operators while supporting the need for accountability. This approach may also result in significant cost savings over time.

Governance arrangements for an integrated system

NCAC supports the Expert Advisory Panel's recommendation that new governance arrangements should be established to support an integrated regulatory system (p15). A National Board comprising State and Commonwealth membership

supported by a Ministerially appointed advisory group, made up of sector experts and academics, is one such model.

The National Board would oversee the integration of the policy and administration systems for children's services via two levels of agencies with specific roles and communication responsibilities:

- A National Children's Services Quality Standards Agency that would manage the setting and publication of standards and the rating system, determine measurement processes, train assessors and manage data collection and reporting,
- State/Territory Children's Services Quality Systems Agencies that would administer the integrated quality system and manage compliance requirements as per the protocols established by the national agency.

NCAC has administered and successfully implemented changes to the current quality systems for the past 16 years. The organisation is staffed by a committed expert and professional team from a range of disciplines and is well placed to facilitate the transition to an integrated quality system for children's services.

National quality standards

In line with an integrated regulatory system, the proposed National Quality Standards must draw together the structural and process components of current children's services regulations and CCQA. The standards should both prescribe a minimum acceptable level of service and drive continuous improvement.

NCAC supports the Expert Advisory Panel's view that integrated standards must reflect the key aspects of quality identified by the Organisation for Economic Cooperation and Development (OECD) and complement the Early Years Learning Framework currently in development. The standards also need to be developed in a way that will allow them to be reviewed and adapted over time to reflect new research and changing practice.

The standards must apply to all children's services and programs and must adequately cover all age groups, including infants, toddlers, preschoolers and school age children. This approach will diffuse the boundaries between 'care' and 'education' by ensuring that the desired outcomes for children is the same regardless of their age, or setting they attend, while recognising that these outcomes can be achieved in a number of different ways in many different settings.

The standards need to be sufficiently broad that they:

- can be adapted to meet the specific needs of each service, the children and families who use it and the local community, and
- encourage professional autonomy and innovative practice

This is particularly relevant in supporting the Government's commitment to develop a greater number of child and family services which provide care, education, health and family support programs from a single location.

Integrated standards will assist in improving the professionalism of all child care professionals, provide them with increased recognition and create enhanced career pathways. This may, in turn improve the retention rate of experienced professionals and attract new graduates to the education and care field.

Rating System

The welfare of children needs to be the core, underpinning principle for the design of a rating system. Including all service types under one rating system recognises the fundamental right of every child to receive quality care and education, regardless of the setting(s) they use.

The rating system needs to be:

- flexible enough to recognise that quality outcomes may be achieved by different services in different ways
- transparent, simple and provide a clear 'snapshot' of a service's quality for families.

The rating system also needs to advocate the key elements of effective, ongoing improvement by acknowledging sustained quality outcomes and rewarding innovation and leadership.

While NCAC supports the Panel's objective of providing information for families and communities, NCAC emphasises the need to present this information in a meaningful and accessible way (p27). Any rating should include information to support families to understand how the rating decision is made, and encourage them 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.

Conclusion

The transition to an integrated regulatory system and new governance arrangements will require a well planned and supported approach over time to be successful. To ensure their acceptance 'on the ground', there must also be extensive, transparent consultation on the draft standards and they must be rigorously field tested prior to implementation.

NCAC suggests that a staged approach is taken to implementing any new system and that there is a long lead in time to allow services to adapt to such a major change and to meet new requirements. It is not fair to set services up to fail.

It is important to recognise that for the past three years, children's services have been on the brink of change over the course of successive Governments' reform agendas. The continued focus of child care professionals throughout this time has been to provide the best possible care for children.

The timing of, and any new requirements placed on children's services, should take this into consideration. Any changes to the current system must be communicated carefully, comprehensively and in a timely manner.