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Submission in Response to Senate Inquiry into the Provision of Child Care

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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 16 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 February 2009 there are 9431 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 its decision making, actions, communications and customer service.

Terms of Reference

- a. the financial, social and industry impact of the ABC Learning collapse on the provision of child care in Australia;
- b. alternative options and models for the provision of child care;
- c. the role of governments at all levels in:
 - i. funding for community, not-for-profit and independent service providers,
 - ii. consistent regulatory frameworks for child care across the country,
 - iii. licensing requirements to operate child care centres,
 - iv. nationally-consistent training and qualification requirements for child care workers, and
 - v. the collection, evaluation and publishing of reliable, up-to-date data on casual and permanent child care vacancies;
- d. the feasibility for establishing a national authority to oversee the child care industry in Australia

A. The financial, social and industry impact of the ABC Learning collapse on the provision of child care in Australia

NCAC is not in a position to comment on the financial impact of the ABC Learning collapse.

The social impact of the ABC Learning collapse concerns those children and their families that have been displaced from child care. While a number of families affected by the collapse have been able to access other child care services, transitioning to alternative care arrangements disrupts the continuity of care and children's relationships with their carers, which are integral to their wellbeing and development.

The ABC Learning collapse has also undermined the job security of a significant number of child care professionals, causing additional stress in an already demanding profession. Exacerbated stress levels have the potential to compromise the quality of care provided for children.

The ABC Learning collapse has highlighted the adverse consequences of allowing any single provider to dominate the supply of child care. The Government is currently in a unique position to remedy this imbalance, and to ensure that such adverse market/sector dominance not recur in the future by promoting greater diversity in service delivery.

B. Alternative options and models for the provision of child care

NCAC believes that there is room for all types of providers in child care, including community-based, not for-profit, employer-sponsored and for-profit providers. However, the aggressive acquisition strategy pursued by ABC Learning has eroded the level of choice available to families by restricting the availability of good quality alternatives in many geographic locations.

NCAC believes that Expressions of Interest for purchasing ABC Learning child care centres should be considered on the basis of their ability to provide high quality child care in a safe environment that nurtures all aspects of children's development, over the long-term. Emphasis should also be given to fostering greater diversity in service delivery.

NCAC also believes that the Government should incorporate operational assistance within a national planning framework to guide the development of new services to ensure that services are established in areas where shortages are most pronounced, particularly in inner urban areas where land costs are highest, and for the 0-2 age group, which are more expensive to provide care for by virtue of higher staff to child ratios. Provision of operational assistance should be linked to a requirement to provide high quality child care. Introducing a paid maternity scheme could also significantly alleviate unmet demand in the 0-2 age group.

NCAC also believes that there is room for greater employer involvement in the provision of child care. This belief is supported by a recent study undertaken using data from the Australian Workplace Industrial Relations Survey, which 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).

C. The role of governments at all levels in:

i) funding for community, not-for-profit and independent service providers

The current Child Care Benefit framework requires some child care services to participate in Child Care Quality Assurance (CCQA) in order to be able to pass on fee relief to families.¹ While there are voluntary accreditation systems for children's services in other countries, the Australian systems are unique as they are the first CCQA systems in the world to be linked to child care funding through legislation and to be funded and supported by a Federal Government.

The link between funding and participation has made Australia's CCQA systems a world leader, however it has created difficulties when services are non-compliant (eg obstructionist or found to be of exceedingly poor quality on multiple consecutive occasions). In the past, the Government has been reluctant to withdraw Child Care Benefit funding, as this adversely affects families, 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. Tying additional funding to quality improvements would offer services an incentive to enhance the quality of care they provide, in contrast to the current system of merely applying ineffective sanctions for non-compliance.

All services that provide care and education for children under school age should be included in licensing and accreditation systems. This includes services such as preschools and kindergartens.

ii) consistent regulatory frameworks for child care across the country

AND

iii) licensing requirements to operate child care centres,

At present, 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 staffing ratios, group size and staff qualifications.

Furthermore, 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 sixteen years, however, these standards now need to be reviewed 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 a more streamlined approach developed. The

¹ Participants in Child Care Quality Assurance (CCQA) are long day care centres, outside school hours care services and family day care schemes.

standards need to be integrated and focused around outcomes for children, rather than service type.

Revised standards should focus on quality outcomes for children and should include:

- Staffing requirements and arrangements (staff to child 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

These 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.

iv) nationally-consistent training and qualification requirements for child care workers, and

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. Offering scholarships and university/TAFE fee assistance would also assist in attracting child care graduates.

The second relates to upskilling 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.

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. Immediate implementation of training and ratio requirements will be problematic due to the current 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 language, cost and time constraints. Recent government initiatives to remove TAFE fees related to child care courses and to increase University places is a good beginning.

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

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.

v) The collection, evaluation and publishing of reliable, up-to-date data on casual and permanent child care vacancies

NCAC would support any initiatives to collect, evaluate and publish up-to-date data on casual and permanent child care vacancies. Consideration needs to be given to ensure that data collection does not place increased administrative or cost burden onto services.

D. The feasibility for establishing a national authority to oversee the child care industry in Australia

A national authority to oversee licensing, accreditation and other additional indicators of quality child care (such as leadership, mentoring, innovation and parent engagement) could assist to drive a higher level of quality service provision. Having a national authority could also assist in terms of aligning components of the early care and education system for increased accountability in improving quality of care.

A 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 authority that would: manage the setting and publication of standards and rating system; assess 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 standards and protocols set by the National Children's Services Quality Standards Agency; and manage Child Care Benefit (or operational assistance) 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.

Over the past 16 years NCAC has successfully implemented changes to the Quality Assurance systems and is staffed by experts who can facilitate any transition.

One measure of industry satisfaction with NCAC's administration of the current Quality Assurance systems is the most recent *Validation Evaluation Form Analysis*. On average, over a range of measures of the Validator's performance, more than 90% of child care services that received a Validation Visit between October – November 2008 were satisfied with the completion of their Validation Visit.

References:

Brandon, P. and Temple, J. (2007), "Family Provisions at the Workplace and Their Relationship to Absenteeism, Retention and Productivity: Timely Evidence From Prior Data", *Australian Journal of Social Issues*. Volume 42, Number 4, pp 447-460

NCAC. (2009). *Validation Evaluation Form Analysis 2008*. Available from http://www.ncac.gov.au/reports_statistics/reports_stats_index.asp