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ACCS Submission to the Regulation Impact Statement for Early Childhood Education and Care Quality Reforms

Australian Community Children's Services welcomes the opportunity to comment on the Early Childhood Development Steering Committee Regulation Impact Statement for Early Childhood Education and Care Quality Reforms.

Who is making this submission?

Australian Community Children's Services (ACCS – *formerly NACBCS*) is the national peak body representing not-for-profit community-owned children's services and those who support the right of children to access these services. ACCS is an unincorporated, non-profit federation of branches in each State and Territory. Each branch brings together individuals and organisations in a State or Territory to appoint two delegates to the National Council, which in turn appoints Office Bearers of the National Secretariat.

What are community-owned children's services?

Community-owned children's services are operated as social enterprises, delivering high quality, financially viable services that are an important part of public infrastructure. They are operated by a range of not-for-profit providers including local government, churches, educational institutions, parent associations/co-operatives and other non-government organisations. Community-owned children's services have been supporting Australian children and their parents for many years.

Community-owned children's services include centre based early childhood services, occasional care, outside school hours care, and home based care such as family day care and in-home care. Community children's services include emerging models of integrated child and family centres, and flexible innovative models for rural communities and for children and families with additional needs.

These services foster children's development, support their families and build important community capacity and social capital.

National Quality Standard and Ratings Framework

1. Governments are proposing to implement consistent minimum standards of care across Australia. Do you agree with this approach? Why or why not?

ACCS has an agreed national position supporting this proposal. All formal children's services should be regulated through the Federal Government thus removing the duplication and crossover of the current state/territory licensing requirements and Federal Government quality assurance. We believe this could be achieved through two bodies.

- A national body that sets the national regulations (service input) and quality improvement standards (output).
- A separate independent government/statutory body that measures the continuous improvement program; that is that services are implementing, improving and complying with the program.

The national body would oversight a consistent regulatory framework for children's service throughout Australia, setting high standards and implementing them in a rigorous manner with clear sanctions for failing to perform at the required standard.

Any states/territories that currently have higher standards than the agreed national standards must be required under an inter-governmental agreement to retain these higher standards.

2. For each care type, which of the options set out in Chapter 5.3 do you believe would best achieve a good balance between meeting the government's objective of enhancing learning and development outcomes for children, and affordability for parents, and why?

Centre-based care

ACCS supports option 4 for centre-based care.

However we would require that any degree qualified teacher working in a long day care setting should be required to have an early childhood degree. It is not adequate that only one teacher should have industry specific qualifications. Does this mean that someone with an IT degree has adequate theoretical background to successfully implement a high quality early childhood education and care program as required by EYLF and ensure that 4 year olds are prepared for school.

Waiting until 2020 to introduce a ratio of 1:3 for babies is far too long - we believe that this ratio should be implemented sooner than this given that four of the eight state/territory jurisdictions will have a 1:4 ratio for babies from 2010.

Group sizes need to be considered as an important element of effectively implementing child:staff ratios. Group size considers what is an optimum number of children grouped together in a well defined space or room.

Ratios also need to consider whether these staff are located on the premises or physically located in the room and engaged in activities with the children.

Family Day Care

ACCS supports option 2 for Family Day Care.

3. Do the proposed standards address different cultural and diversity requirements and considerations adequately? If not, do you have any suggestions for how the standard could be further improved?

ACCS understands that the national Early Years Learning Framework (EYLF) is not under consideration in this consultation; however we wish to lodge our comments in regard to cultural diversity. The EYLF is almost completely silent on cultural diversity, most particularly acknowledging Aboriginal and Torres Strait Islander families. This is a very disappointing outcome and does not further the Federal Government's apology nor contribute to targets to reduce the gap.

It is not possible to provide specific comment on the standards as they are provided in general terms only. More detail is required prior to any useful comment being provided.

4. What would be the impacts of changes to FDC arrangements?

If the new standards result in some carers caring for less children, this will result in less income to a Family Day Care co-ordination units through decreased carer and family levies. The economic analysis provided by Access Economics does not include any calculation of the potential loss of income to Family Day Care co-ordination units.

5. What would be the impacts of the proposed changes to staff qualifications on services, particularly small, or rural and remote services?

Small children's services are currently required to have some trained/qualified staff as part of their existing child:staff ratios, and this requirement varies from state to state. The most significant change for small services will be the requirement to employ a degree qualified early childhood teacher. In practice in some states it is most likely that this will impact on only a small number of services. For example, in NSW a children's service licensed for 29 or less children is not required to employ a degree qualified early childhood teacher. It is this small number of services that will now be required to employ a full or part-time degree qualified early childhood teacher.

In the short to medium term it will be an industry wide challenge to find appropriately qualified staff, and this will be most marked in rural and remote children's services, and those located in Aboriginal and Torres Strait Islander communities.

6. Do you think the proposed quality rating system would be an effective indicator of service quality?

ACCS believes that the rating system will only be an effective indicator of service quality if it genuinely reflects high standards.

The quality rating system must not act as a disguise for poor quality in a service in order to give families peace of mind in using a children's service.

The bar to achieve a rating of high quality must be set very high. We propose the introduction of a system of application in order to be considered for the rating of excellent.

7. Would the quality rating system help to drive continuous improvement in the ECEC sector? If not, do you have any suggestions for how the quality rating system could be further improved?

The quality rating system should be based on evidence of what is good for children. For example the draft proposal designates providing a warm relationship for children as high quality provision. ACCS sees provision of warm relationships with children as an essential requirement for children to develop strong relationships into the future; therefore it should be considered basic practice, not high quality. The corollary of this standard being rated high is that it assumes it is OK to provide indifferent relationships with children as basic care.

8. What criteria do you think should be used to rate a service as Excellent? How should the rating be assessed and by whom?

ACCS believes a rating of Excellent should only be available to services who demonstrate quality provision well above and beyond minimum standards. The assessment must be made by highly skilled professionals with a deep understanding of early childhood development and of the role of quality children's services in enhancing this development.

Licensing and regulatory arrangements

9. Do you think integrating the existing regulatory arrangements will reduce costs for the industry and for governments? Do you think this approach will be sufficient to ensure ECEC provided is high-quality?

Integrating existing regulatory systems may cost less due to administrative efficiencies, counterbalance by increased travel and communication costs in a nationwide operation; however ACCS believes that cost saving is a less important focus than that of enhancing the quality of children's services. Proposed reforms must be tested against this criterion ahead of tests for cost savings.

Integrating the current systems may result in higher quality early childhood education and care services by shifting the focus away from compliance management onto building relationships with children, pedagogy planning and delivering a relevant and appropriate program for children.

Implementation

10. What do you consider to be the key advantages and disadvantages of the proposed reforms?

One of the key gains of this reform proposal is that all the States and Territories have demonstrated a united commitment to improving the quality of children's services for Australia's children.

Unfortunately, the proposals have not outlined changes that would bring Australia's early childhood education and care system into line with International best practice, and in places does not even meet the quality standards in some of the States and Territories.

ACCS seeks a commitment from all jurisdictions that this reform agenda will not permit any jurisdiction to lower the quality standards in the future where they may be exceeding them now and that all jurisdictions must continue to improve in line with International best practice.

The omission of Outside School Hours Care (OSHC) as an important children's service is a missed opportunity; relegating the needs of children in OSHC to the backburner fails children who attend this type of care.

11. What do you consider to be the key challenges associated with the implementation of the proposed reforms?

As above.

12. What factors may impact on the ability of ECEC services to implement the reforms?

Resourcing – ACCS seeks a commitment of certainty around funding sources and the level of funding services will receive and the accountability requirements of that funding.

13. What transition arrangements do you consider appropriate for implementing the proposed staff-to-child ratios and staff qualifications?

ACCS has no comment to make on transition arrangements at this time.

14. What is the overall impact of the proposed changes on you and what would be your response?

The process of improving quality in early childhood education and care services is welcome and timely; these changes will make a significant contribution to improving outcomes for Australia's children, reducing the gap for Aboriginal and Torres Strait Islander people and increasing social inclusion.

The community children's services sector welcomes the proposed changes and congratulates COAG on achieving this historic commitment to Australia's children.