

Australian Children's Education and Care Quality Authority  
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### **Criteria for Excellent Rating ACCS response to the ACECQA Discussion Paper**

Australian Community Children's Services (ACCS), as the national peak body advocating for the right of Australia's children to access quality, not for profit community children's services, is pleased to provide comment on the draft criteria for the Excellent Rating by the Australian Children's Education and Care Quality Authority (ACECQA).

ACCS welcomes the aspirational nature of the draft criteria. We note the importance of having such schemes to unite the previously differing jurisdictions under one nationally agreed level of excellence for all services to aspire to. We strongly believe the Excellent Rating should be designed for services of unique high quality that demonstrate exceptional leadership within their community and sector. The purpose of the Excellent Rating would be seriously diminished if a large number of services were rated at this level. Furthermore we believe the Excellent Rating must be designed to do justice to the National Quality Standards (NQS) and hold high the level of expectations of continual development embedded within the national reforms.

We welcome the requirement for the three year forward plan as a mechanism for ensuring continual learning and improvement.

We note that page two clearly states a service must have already obtained an exceeding National Quality System (NQS) rating prior to applying for an Excellent Rating. While we acknowledge that some services, especially those in remote locations may have circumstances that will limit their current capacity to exceed the NQS and subsequently apply for the Excellent Rating, ACCS strongly believes the criteria should not be modified or the standard lowered as an approach to mitigate these inequity issues, especially across states and territories.

In line with the aspirational tone of the Excellent Rating we believe a service must be operating above the transitional requirements for ratios and qualifications, proving that they are leading the sector by operating with staff ratios and qualifications at the level that all services will have reached once the transition period to NQS is completed.

## Comments on Draft Criteria

ACCS believes ACECQA should ensure that the Excellent Rating process and all supporting documents are accessible and clear to all. Clear messaging must accompany this initiative and ACCS advocates for a strong ongoing communication strategy to commence in 2012.

A major focus of this should be on educating the general public of how the Excellent Rating fits in with the broader NQS, emphasising that this rating is not the only thing they need to know about a children's service. The communications strategy must promote an understanding that many quality services will already be exceeding the NQS ratings but may themselves decide not to apply or may not necessarily qualify for an Excellent Rating. This is aimed to reduce unfounded fears for families participating in high quality services that do not yet have an Excellent Rating.

We also acknowledge that within the context of previously differing regulations and standards across jurisdictions, there may be some states and territories with a high number of excellent services and others with none. Therefore the process of the excellent rating system must be promoted as something embracing continual improvements across early childhood education and care services and as one of a number of tools to bring about nationally consistent standards of quality.

The general public and the media also need to be aware of the real timelines for implementation of the Excellent Rating system. For example it may be many years before all services will be assessed under the NQS and therefore many years before all services will be able to begin to contemplate applying for the Excellent Rating; this delay must not be misunderstood as an indication of lower quality. In particular it must be emphasised while the first service to receive an Excellent Rating will be an exceptional service, it will not necessarily be the best service within the country, but rather the first of a number of services which will eventually be rewarded with the excellent rating.

ACCS recommends ACECQA review the language to be used in the application and all supporting documents to ensure it is clear and accessible to all. Currently there are jargonistic terms that could potentially confuse or alienate some services. Terms such as "lighthouse service" should be avoided. Furthermore accessible language is more inclusive to Aboriginal and Torres Strait Islander services and other culturally and linguistically diverse services that may operate with English as a second or third language.

Additionally ACCS recommends that the criteria clearly state that examples are not prescriptive. ACCS is aware of many services that have looked at the criteria in the current draft and interpreted the examples as a checklist. ACCS recommends that the application and supporting documents should avoid lists of dot points as they are easily misinterpreted.

Communications must be clearer in expressing the fact that the service drives the process and elects what areas they believe would demonstrate their excellence. We believe this places the onus of identifying and defining excellence where it should be - on the service applying. An excellent service could reasonably be expected to have this capacity.

ACCS is concerned at the breadth of criteria one and four in regard to parent and community engagement. The latter includes engaging parents and families in all elements of service provision. As the peak body for not for profit community owned services, we see parent involvement in management of the services as a clear contributor to a high quality, excellent service. We believe to achieve the Excellent Rating services should be required to engage parents in governance decision making. While we believe this is alluded to in the current wording 'all elements of service provision' (criteria four) it should be further explained.

In line with the Excellent Rating being beneficial to all within the sector we encourage services to be supported to establish processes to disseminate their good practice as an educative tool for the whole sector. We suggest ACECQA looks to New Zealand's previous Centres of Innovation (COI) Program. This program supported services identified as COI to conduct research to further develop and test their existing innovative practice, and secondly, to disseminate information about their innovation and the outcomes of their research. The research was further supported by research associates contracted by government to provide methodological and research support to their educator-researcher services.

We trust the development of a robust assessment process will follow the finalisation of the details of this rating to provide specific detail of evidence required to demonstrate and measure improved outcomes for children. ACCS looks forward to receiving this in the near future.

### **Process of assessment**

ACCS is very interested in ACECQA's intentions for qualifications for the assessors of the excellent rating. ACCS has had previous correspondence with ACECQA on the importance of appropriate qualifications and experience for assessors under the new National Regulations. Our policy position on general assessors is that all the assessors should have early or middle childhood degree qualifications or above. The content and philosophy of the degree should be appropriate to the range of service types they will be assessing. Further assessors should have experience working in the type of service they are assessing - long day care, outside school hours care, family day care etc. The system must contain the capacity for assessors to retain currency in their academic qualifications and in their direct experience working in the sector. We believe the nature of the Excellent Rating warrants an even higher standard for assessors in skill and expertise. A commitment to this will further support the integrity of the Excellent Rating.

In assessing a service for an excellent rating, ACCS recommends that a team of assessors are used, to assist in striking the appropriate balance of expertise. Furthermore we recommend the assessment involves assessors being on the site of the service for a minimum of three days for smaller services and five days for services larger than 100 places.

ACCS recommends robust mechanisms to verify the service's application. Potentially, the process could include third parties (i.e. community members, organisations and others) that are not nominated by the service to be part of a verification process to ensure the service stands up to the rigour of the community and media.

## Other Issues

As discussed previously, ACCS is acutely aware of the potential inequity within this initiative, between state and territories, regions and services. While we strongly support the rating as recognition for particular exceptional services and as an incentive for other services to aspire to, we know that larger, well resourced services operating in higher socio-economic areas of Australia will be more likely to be in a position to apply.

As the peak body for not-for-profit community owned children's services we are aware of many services of extremely high quality, potentially of excellent standard, that will be restricted as standalone services in applying due to the application costs and human resources required. It is imperative that promoting services to apply for the Excellent Rating does not unintentionally result in services redirecting resources away from outcomes for children. Likewise we do not wish the potential inequity to be addressed by modifying criteria or lowering the standard required by services, as this will legitimise substandard levels of quality for children and undermines the integrity of the Excellent Rating. This type of approach would also suggest that lower standards are alright for some children in some circumstances but not for others.

ACCS believes ACECQA and the Australian Government should address the issues of inequity by supporting smaller and less resourced services to ready themselves for applying for an Excellent Rating. This could include, but is not limited to:

- A mentoring program that pairs services who have already obtained an Excellent Rating to potential applicants to assist and guide the application process
- Scaling of the application fees to the size of a service and whether it is attached to a large organisation
- Operational subsidy for services operating in low socio-economic areas or with high volumes of children at risk to support their capacity to demonstrate excellence and apply for Excellent Rating
- Small grants to non-profit community children's services towards costs for the application and additional staffing hours