



# **2014 Review of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care**

**ACCS Submission – 4 July 2014**

**Australian Community Children's Services**

PO Box 1730, Preston South, Victoria, 3072

Phone +61 3 9486 3455 Fax +61 3 9486 3271 [www.ausccs@cccinc.org.au](http://www.ausccs@cccinc.org.au)

## About ACCS

Australian Community Children's Services (ACCS) is the peak body representing Australia's not-for-profit community education and care services and those who support the right of children to access these services. ACCS has branches in every state and contact people in each territory throughout Australia. Our membership includes community based long day care services, preschools/kindergartens, family day care and in-home care services, mobiles, and out of school hours services throughout Australia; from small stand-alone parent managed services located in rural and remote areas to those sponsored by very large not-for-profit organisations.

ACCS is committed to:

- children, families and communities
- children's rights for the best care, education and health services
- community ownership
- connected services for children, families and local communities
- not-for-profit cost effective services and
- cultural diversity and respect for Aboriginal and Torres Strait Islander people as custodians of the land.

## Introduction

ACCS believes that the objectives of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care have been largely met. The sector required major reform and the introduction of the National Quality Framework (NQF) has led to significant improvements in the quality of early and middle childhood education and care. Like any new system it takes time and resources for these changes to become embedded and it is a credit to all levels of government, service providers and educators across the country that so much has been achieved in a short time.

The NQF is a rigorous, evidence based quality framework that

*“promotes family centred practices supporting and promoting open two way communication between parents and educators and ensuring a sense of partnership in the education and care of each child”* (Kaleena Pont School Holiday Program Coordinator, City of Greater Geelong).

ACCS strongly supports the full implementation of the NQF to 2020. The NQF is a new system and it is imperative that this full cycle of implementation to 2020 is carried out as planned.

### **ACCS Trends in Community Children’s Services Surveys Waves 1 to 3**

Since the introduction of the NQF ACCS has conducted three waves of a national survey *Trends in Community Children’s Services Survey (TICCSS)* designed to track how the community sector have engaged with and implemented the NQF. Over 600 services participated in the first survey conducted in May/June 2012, over 500 services participated in the second survey conducted in November 2012 and over 800 services participated in the third survey recently conducted in June 2014. Services from all states and territories participated and respondents included a broad range of service types - long day care, family day care, outside school hours care, preschool/kindergarten, in-home care and mobile services. The research was designed to be explorative and the findings are indicative and not representative.

This submission will draw on findings from the first and second wave published in the two *ACCS National TICCSS Reports* and unpublished preliminary data drawn from the 3<sup>rd</sup> Wave of the survey which has only recently closed.

## What are the strengths of the National Quality Framework and what is working well?

### National consistency

The NQF provides a nationally consistent quality assurance framework for all approved education and care services throughout Australia. As a national agreement it supports equity of provision over time across the federation for all children and families

For families, this is critical. This means that regardless of which children's service a family may use in any geographic location throughout Australia they can expect and understand that there is a base line of quality early and middle childhood education and care service delivery.

For education and care services staff and educators there is a common, collective understanding of quality assurance underpinned by agreed approved curricula frameworks that are flexible and adaptable to meet the local needs and cultural contexts of children and families attending any approved education and care service throughout Australia.

For state and territory Regulatory Authorities the introduction of a single uniform law and associated regulation, along with the ratings and assessment system has streamlined administrative processes, quality control and compliance requirements for each of these Authorities.

### Minimum qualifications

The introduction of minimum prescribed qualifications is one of the successes of the NQF. One of the key structural components of quality for education and care services is that all children's services staff have relevant qualifications.

Australian and international research indicates that higher levels of relevant early and middle childhood qualifications support better outcomes for children, as well as improving retention rates and levels of job satisfaction for educators, and the capacity of education and care services to sustain quality program delivery over time (Huntsman, 2008; Rush, 2006; Sylva et al, 2004)<sup>1</sup>.

Minimum early childhood qualifications enable a base line entry point into education and care services that ensures educators can engage in a basic way with the quality framework and prescribed curricula. Higher qualifications such as a diploma or early childhood teaching degree facilitate a much more rigorous engagement driving even higher quality outcomes for children attending education and care services.

TICCSS data demonstrates that the introduction of the NQF has resulted in the sector taking

---

<sup>1</sup> Huntsman, L. (2008), *Determinants of quality in child care: A review of the research evidence*. [http://www.community.nsw.gov.au/DOCSWR/assets/main/documents/RESEARCHNOTES\\_WHAT\\_QUALITY.PDF](http://www.community.nsw.gov.au/DOCSWR/assets/main/documents/RESEARCHNOTES_WHAT_QUALITY.PDF) (accessed 30 June 2014). Rush, E. (2006), *Child Care Quality in Australia*, Discussion Paper No 84 The Australia Institute. Sylva, K., Melhuish, K., Sammons, P., Siraj-Blatchford, I. & Taggart, B. (2004), *The Effective Provision of Preschool Education (EPPE) Project, Final Report*. London: Institute of Education.

significant action to improve the qualification profiles of educators across all education and care services types. The results of all three waves of the TICCSS research demonstrates that the sector has been preparing for the improved qualification requirements included in the NQF over a number of years and are now in a strong position to meet them.

TICCSS 3<sup>rd</sup> Wave provides data on 10,995 educators. In June 2014 only 7% of educators did not have a relevant formal early or middle childhood qualification, compared with 12% in May 2012. Almost one quarter (23%) of the workforce is currently engaged in studying for a formal qualification.

TICCSS 2<sup>nd</sup> Wave in November 2012, showed that ahead of the 2014 requirement for all long day care and preschool services to employ a degree qualified early childhood teacher, just over two thirds (69%) of long day care services reported having at least one educator with either a four-year or three-year degree in early childhood education. One quarter (25%) of services reported having at least one educator currently working towards a four-year degree. This is indicative of educators embracing the professionalisation of their sector and taking up opportunities for higher qualifications.

Provisions in the *Regulations* for those enrolled in study to be considered as meeting the minimum qualification requirements and the option to apply for a waiver if a service is unable to recruit qualified staff in the short term, has addressed any concerns that services would not be able to operate due to a shortage of qualified educators.

## **Professional recognition**

Minimum qualifications, national consistency, agreed curricula and quality frameworks have enhanced the professional status and standing of those who work in early and middle childhood education and care services throughout Australia. The NQF has heightened internal and external public awareness and knowledge related to the importance of the early years in children's development.

## **Improvements to educator:child ratios**

Improvements to educator:child ratios are one of the significant successes of the NQF. These ratio changes bring in line differing ratios from states/territories to one agreed base line of national consistency. These improved ratio changes enhance outcomes for children as evidenced in a summary of Australian and international research on the positive impact of increased staff to child ratios on outcomes for children in the *Evidence brief on NQF ratios and qualifications* (ECA 2013)<sup>2</sup>.

Contrary to the reports that this area of the NQF is creating problems for services, TICCSS shows respondent services are meeting the new ratios and some services have chosen to operate well above the national standards, recognising the relationship between quality and better educator:child ratios.

In TICCSS 2<sup>nd</sup> Wave (November 2012) all long day care respondents were meeting the new

---

<sup>2</sup> <http://www.earlychildhoodaustralia.org.au/wp-content/uploads/Evidence-Brief-on-NQF-Ratios-and-Qualifications-February-2013.pdf>, accessed 4 July 2014

national minimum standard of a 1:4 ratio for children aged from birth to less than two years that commenced on 1 January 2012; and one quarter (25%) were operating their babies' rooms at a 1:3 ratio or better. Data from TICCSS 3<sup>rd</sup> Wave shows that 27% of respondent services are now operating their babies' room at 1:3 ratio or better.

A national minimum standard of one educator for every eleven children aged 3-5 years will apply from 2016. TICCSS 1<sup>st</sup> Wave (May 2012) showed that 72% of respondents already met this ratio and 67% exceeded the 1:11 requirement; well in advance of the legislative requirement. TICCSS 3<sup>rd</sup> Wave (June 2014) shows that 80% of respondents are meeting this standard, two years ahead of time; and three quarters (74%) are already exceeding it.

ACCS believes it is imperative for the well-being and safety of children that the ratios in the NQF remain in place or are improved and that future scheduled improvements to ratios are implemented.

It is essential that these ratios, which have been developed as the minimum standards, are maintained across the whole day. Any suggestion that the educator:child ratio could be averaged across a day to make it easier for providers to comply with this requirement at peak times of the day is alarming. Services need to be properly staffed so that children are adequately protected from hazard and harm at all times of the day.

### **Increased quality of education and care and improved positive outcomes for children**

The NQF is a quality reform agenda, developed from Australian and international evidence-based research on quality indicators. It has helped to raise the profile of the sector and of the importance of the early and middle years for children's current and long term wellbeing, learning and development.

ACCS members report that they have observed improved service provision and improved outcomes for children across Australia, not just in community managed and not for profit services but across all ownership types. ACCS believes that the National Quality Standard (NQS) lifts the bar on what is expected across all Quality Areas and this has resulted in important changes in practice and significantly improved outcomes for children.

This is supported by the results of TICCSS 3<sup>rd</sup> wave data that shows significant numbers of services implementing positive changes in the seven Quality Areas in the last twelve months.

| <b>Quality areas that services have implemented positive changes in</b>  |     |
|--|-----|
| Quality Area 1: Educational program and practice                         | 86% |
| Quality Area 2: Children's Health and Safety                             | 52% |
| Quality Area 3: Physical environment                                     | 62% |
| Quality Area 4: Staffing arrangements                                    | 51% |
| Quality Area 5: Relationships with children                              | 55% |
| Quality Area 6: Collaborative partnerships with families and communities | 62% |
| Quality Area 7: Leadership and service management                        | 56% |

The introduction of approved learning frameworks has been embraced by services. It is exciting to see that 86% of TICCSS respondents reported implementing positive changes in *Quality Area 1 Educational program and practice* in the last 12 months. Furthermore just over two thirds (68%) of respondents identified improved outcomes for children and/or services being more focused on meeting children's needs as one of the top three highlights their service has experienced in the last twelve months.

A strength of the NQF is the development of seven Quality Areas and accompanying standards and elements which work together to ensure quality service provision. All seven evidence-based quality areas are intrinsically linked and one area does not carry more weight than another. The seven quality areas have been developed to consider all aspects of education and care services delivery. Quality education and care services are predicated on structural and process dimensions. Structural dimensions relates to:

- educator to child ratios
- the qualifications of educators and
- group size; that is the number of children in a room or defined space.

Process dimensions relates to:

- the quality and nature of the adult child interactions and relationships within a service and
- the curricula; that is the activities and learning opportunities provided to children as a service.

These two dimensions are intrinsically linked. The quality of any children service is a product of the interplay between these structural and process dimensions; this interplay is made more effective when there is constructive and supportive leadership of the service, engagement with families and local community, underpinned by local cultural contexts<sup>3</sup>.

### **Introduction of improved quality assurance and continuous improvement process**

The assessment and ratings process as a driver for continuous improvement is also one of the successes of the NQF. The introduction of this process, on the whole, has been a positive experience with many community managed services reporting that the NQF process was simpler than the previous accreditation system and provides a more authentic and real picture of the quality of the service.

In TICCSS 3<sup>rd</sup> Wave, almost half (47%) of the respondents indicated that *developing and implementing the QIP has led to improvements at our service* as one of the top three highlights for their service in the last twelve months.

Half (49%, 426) of the service respondents to TICCSS 3<sup>rd</sup> Wave had been through the

---

<sup>3</sup> Cloney, D.; Page, J., Tayler, C., & Church, A. (2013), Assessing the quality of early childhood education and care, *Policy Brief*, No. 25 July 2013, Centre for Community Child Health, The Royal Children's Hospital Melbourne.

assessment and ratings process. Of those respondents that had been through the assessment and ratings process:

- 80% indicated that the process had a positive or extremely positive impact on quality improvement at their service
- 73% rated the clarity of the process as positive or extremely positive
- 67% rated the usefulness of the assessment and ratings report as positive or extremely positive and
- 86% of services rated the ease of the process and the impact on the running of the service as positive (41%) or extremely positive (23%).

## Administrative impact of the National Quality Framework

The introduction of the NQF was celebrated as a long awaited administrative reform for service providers and those involved with the management of early and middle childhood education and care services. Many in the sector had lobbied for years for an end to the dual systems of state/territory based regulation and national quality assurance administered by different jurisdictions. It put an end to a system where some services may have needed to submit paperwork to renew a state/territory license and have an inspection based on this application, and also submit paperwork and have an external validation visit against Australian Government accreditation standards within the same year. Service providers and staff in many early and middle childhood education and care services needed to be cognisant of different jurisdictional and different service type requirements and maintain systems to ensure compliance with both.

The introduction of a single uniform *Regulation*, and ratings and assessment system governed by the same legislation and administered by one Regulatory Authority in each state/territory has streamlined administrative processes and compliance requirements significantly for many services. The effect of this has not been immediate as services have needed to understand and comply with new requirements and processes, and this initial investment in compliance has been time consuming.

Any new national system will have an initial additional regulatory burden as those who are involved in the new system understand its requirements and adapt management and administrative requirements to fit with the new system. This has certainly been so with the NQF; and was absolutely the same experience in January 1994 when the National Childcare Accreditation commenced.

The perception of increased regulatory burden under the NQF was exacerbated by a number of issues.

- The implementation of the National IT system was significantly delayed well beyond the commencement date of the NQF. This resulted in services, Regulatory Authorities and ACECQA needing to overlay, unexpectedly, a manual system for much of 2010 and into 2011. This created much frustration from services with, for example, applications and approvals being dramatically slowed down, and lost applications due to an overwhelming paper volume.
- The implementation of other significant national reforms including workplace health and safety, and privacy legislation that coincided with significant changes in the NQF such as minimum qualification requirements and ratio improvements. While all of these changes are attributable to very different legislative requirements, many services perceive them to be all part of the same increased regulatory burden load.
- Some state and territory Regulatory Authorities changed some of their reporting requirements to comply with the national reporting system. For some services this did increase regulatory burden until these new requirements became bedded down.

The ACECQA *Report on The National Quality Framework & Regulatory Burden* (2013)<sup>4</sup> shows that services on the whole, do not yet perceive a decrease in administrative burden. ACCS believes this is to be expected at this point in the reform process. Over the last couple of years services have needed to undertake a significant amount of work including:

- updating policies to reflect changes to legislation
- writing and put into practice several new policies that were not required under previous legislation
- undertaking a self-assessment process against the new NQS and use this to write and update a Quality Improvement Plan
- ensuring that services comply with new *Regulations* across a range of areas including the introduction of Nominated Supervisors and Certified Supervisors
- becoming familiar with and use new approved learning frameworks and
- participating in or prepare for a new assessment and ratings process.

The perception of increased regulatory burden for some services reflects anxiety around a new system and lack of experience going through an assessment and rating process. The ACECQA research shows a critical point of different regarding perceived administrative burden. Once services have received their first assessment and rating visit and their rating;

- their perceptions of level of burden decreased (p. 51<sup>4</sup>) and
- agreed that the level of administrative burden had reduced since the introduction of the Law and Regulation (p. 77<sup>4</sup>).

It is interesting to note that despite these perceived significant demands on services, the research undertaken by ACECQA (2013) shows that 78% of providers were either very supportive or supportive of the NQS. ACCS believes that as more services complete their first cycle of assessment and ratings the perception of administrative burden will decrease.

TICCSS data also reflects a decrease in perception of increased paperwork with:

- 86% of respondents identifying this as a one of their top three issues in TICCSS 1<sup>st</sup> Wave (May 2012) and
- only 46% identifying this as one of their top three issues in TICCSS 3<sup>rd</sup> Wave (June 2014)

Furthermore 10% listed *Administration and paperwork is more streamlined* as one of the top three highlights of the past twelve months (TICCSS 3<sup>rd</sup> Wave).

ACCS believes that with many services having successfully moved through this transition

---

4

<http://www.scsec.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/Publications/ACECQA%20Research%20Report%20on%20the%20NQF%20and%20Regulatory%20Burden%20-%20Combined.pdf>, accessed 3 July 2014.

period and implemented many new requirements, it is imperative that this effort is built on and not wasted. The last thing services need is another round of significant changes to requirements.

An ongoing challenge for services is keeping up to date with and understanding their other legal obligations across all jurisdictions. Addressing this issue would significantly reduce the administrative and compliance complexity for services.

## **What further opportunities are there for streamlining/reducing regulatory burden and improving the National Quality Framework?**

1. Change the assessment and ratings cycle so that a service with a rating of Working Towards the NQS has the option of being reassessed just in the standard/s that they did not receive Meeting or Exceeding the NQS for, as soon as they have implemented changes and their self-assessment process indicates that they are now Meeting the NQS in that Standard.

It is disheartening for a service to have to wait for a whole new assessment and rating cycle in order to achieve a better rating, and time consuming for a Regulatory Authority to reassess every standard (when a service may have received Exceeding the NQS in some areas).

ACCS believes however that it is imperative that for a service to receive an overall Meeting the NQS rating it should meet each of the 58 elements in the NQS and that there should be no change to this requirement. When the health, safety, wellbeing, learning and development of children are at stake it is essential that services are supported to meet every single minimum standard. In some situations 'a pass' means getting 50% or better on a test; applying the best interests of the child principle to assessment and ratings means nothing but 100% is acceptable for Australia's children.

### **2. Review the Excellent Rating**

ACCS believes that the Excellent Rating should be reviewed with strong consideration given to removing the Excellent Rating, while increasing the level and requirements for a service to receive Exceeding the NQS.

As a minimum ACCS recommends that the Excellent Rating be put on hold at least until all services have been through the assessment and ratings process and direct resources saved by doing this to increasing the pace of assessment and ratings visits.

3. Increase the number of unannounced visits to services by Regulatory Authorities to monitor continuity of practices.
4. As a priority bring all service types including in-home care, occasional care, mobile services and MACS into the scope of the NQF.
5. Further resource services to ensure that there is a 'no wrong door' approach (ACECQA or each Regulatory Authority) for information about the broad range of legislative requirements that services need to meet.

This could include for example regular update alerts and explanatory notes to all services when any federal or state/territory legislative requirement changes across any of the required policy areas and the implications of this for services, and updating the National Framework Resource Kit to include:

- clear outlines of what each required policy needs to cover and

- listing all other federal and state/territory based legislative requirements in each policy area.
6. Improve the educator:child ratios for children less than 12 months to 1:3.
  7. Provide services with more clarity on what level of documentation is required for Quality Area 1: Educational program and practice.
  8. Further improve the assessment and ratings process

The introduction of this process has been largely successful. There is consistent feedback that this system is easier and simpler for services and gives a more accurate rating and more authentic picture of what is happening at the service. As with any new system however there is scope for further improvements including:

- ongoing training, support and moderation to ensure that Authorised Officers are consistent in their rating of services – there are some reports that in some states/territories and in some regions there is not always consistency in how each element is assessed
- employment of Authorised Officers with relevant contemporary early/middle qualifications and experience, including of different early and middle childhood education and care services and
- provision of more detailed continuous improvements strategies for services with ratings of Meeting or Exceeding the NQS.