

20 February 2015

## Introduction

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ACCS as the national peak body for the not-for-profit children's services sector welcomes the opportunity to provide feedback to the *Review of Training Packages and Accredited Courses - Discussion Paper*. Our feedback is central to the first principle that this review is being undertaken from – *that the national system of qualifications must provide a reliable signal to employers about the skills an individual has and must be underpinned by industry-defined occupational standards that in particular, provide a basis for consistent assessment of competence in those skills across the training system.*

We note that in the discussion paper, the document uses the term 'industry'. However, in the early and middle childhood education and care sector, ACCS takes the position that we do not manufacture a product and hence we refer to the sector rather than an industry, consequently we will use this term in our feedback response.

ACCS would like to acknowledge the extensive work of the Community Services and Health Industry Skills Council (CS&HISC) in managing the review and update of qualifications for the Children's Services sector (which were endorsed by the National Skills Standards Council in July 2013). ACCS was a significant contributor to the industry consultations (including representation on the subject matter experts group) led by the CS&HISC that resulted in some significant improvements to the qualifications / training packages for children's services.

A vital aim for the reform of qualifications / training packages was to see more qualified staff in the education and care sector to support the provision of quality education and care that all children and families deserve. This cannot be achieved without authentic and ongoing sector engagement; led by a reputable and committed body. ACCS would like to request that considering any new approach or changes to the training system, including any additional updates to the current Children's Services qualifications, take into consideration the work of the CS&HISC.

## ACCS discussion responses

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ACCS responses address many of the questions posed in the discussion paper and are presented under the following three key headings, of which are the identified possible levers for change as outlined in the discussion paper;

- Looking at training packages to see if changes could make them more relevant to the modern economy;
- Looking at the one-size-fits-all approach to the regulation, development and maintenance of training packages and accredited courses to see if a more tailored approach would lead to improved training outcomes; and
- Looking at whether a stronger focus on the assessments of students would better ensure the training system meets the needs of employers and individuals.

ACCS also draws on the content of two previous submissions;

- Appendix 1: 2012 submission to the Qualifications review for the children's services sector
- Appendix2: 2014 submission to the Discussion Paper – Towards a Contestable Model

## **1. Looking at training packages to see if changes could make them more relevant to the modern economy**

ACCS believes that considering any changes to training packages based on the modern economy is a complex consideration for the early and middle childhood education and care sector. It is widely known that demand for educators in the sector is high; as is the demand for child care places. However, at no point should changes to training packages that reflect the modern economy come at the expense of quality.

ACCS recommends that any considerations to this possible lever for change be carefully addressed alongside the 'Early childhood education and care workforce strategy for Australia: 2012-2016'<sup>1</sup>. The workforce strategy seeks to increase the level of qualifications in the ECEC workforce. As discussed in the strategy, ACCS supports the belief that well-trained and qualified ECEC educators with current, relevant and appropriate skills and knowledge are essential for the provision of quality care and education and outcomes for all children. Furthermore, the importance of high quality, well-trained educators is a consistent thread throughout the National Quality Framework and all its components.

ACCS believes that improving the requirements for the design and delivery of training packages by registered training organisations and strengthening assessment requirements for learners is a critical first step. Poorly trained educators place a heavy burden on early and middle childhood services. Ensuring that graduates are 'work ready' reduces stress on the sector and supports the provision of quality outcomes for all children using early and middle childhood education and care services.

In a brief survey<sup>2</sup> conducted by Early Childhood Australia (ECA), it was evident that some graduates, because of inadequate or limited training, are unable to gain employment; while others have needed to be retrained to supplement the gap between their training and the actual job requirements of a quality and work ready educator. This is a significant burden for education and care services and one that is most critical to consider when addressing any proposed changes to reflect the modern economy.

ACCS believes that simplifying or watering down the content, design and delivery, and assessment requirements of training packages is not a consideration for aligning early and middle childhood education and care qualifications to Australia's modern economy. Instead, investment must be made in strengthening the quality of training packages and all its components to ensure a well-trained early and middle childhood education and care workforce made up of quality educators who are able to provide high quality care and education to all children.

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<sup>1</sup> See: <http://deewr.gov.au/early-years-workforce-strategy>

<sup>2</sup> See: <http://www.earlychildhoodaustralia.org.au/wp-content/uploads/2014/01/ECA-Submission-to-the-VET-Inquiry-CE1.pdf>

## **2. Looking at the one-size-fits-all approach to the regulation, development and maintenance of training packages and accredited courses to see if a more tailored approach would lead to improved training outcomes**

ACCS does not support a one-size-fits-all approach to the regulation, development and maintenance of training packages. There are currently 12 Industry Skills Councils that each cover a number of Industries / Sectors; this in itself is a large task to ensure a responsive approach to sector needs.

The early and middle childhood education and care sector is a complex and changing world. As stated in the preamble to the Early Childhood Australia Code of Ethics; *'The notion of lifelong learning, reflective practice, researching with children, new methods of documenting and assessing children's learning, and collaborating across traditional service and discipline boundaries are examples of contemporary requirements for early childhood professionals.'*<sup>3</sup>

ACCS believes that any regulatory body or organisation tasked with the responsibility of overseeing the regulation, development and management of training packages for the early and middle childhood education and care sector, must be able to do so in a timeline and manner that reflects the important growth of new knowledge, theories and practice as they present. Furthermore, they must have authentic and ongoing engagement with sector experts.

ACCS would also like to highlight the risk of a one-size-fits-all approach to regulation and management of training packages in relation to the definition and understanding of 'technical' skills and knowledge. In the early and middle childhood education and care sector, many of the required skills and especially the knowledge domains cannot be simply 'checked off' following completion of a specific task. Consideration must be given to the different types of skills and the range of knowledge required across a range of sectors or industries. This point links to ACCS' feedback in the next section on strengthening the focus on assessment of students.

## **3. Looking at whether a stronger focus on the assessments of students would better ensure the training system meets the needs of employers and individuals**

ACCS firmly believes that a stronger focus on the assessment of students is a critical aspect to ensuring the outcome of 'work ready' educators.

ACCS would like to draw attention to the attached appendixes; Appendix 1 – 2012 submission to the Qualifications review for the Children's Services Sector, and Appendix 2: 2014 submission to the Discussion Paper – Towards a Contestable model. Content provided in these two submissions present some core understandings that lead to the recognition of a need for strong assessment requirements for learners undertaking any early and middle childhood education and care qualification.

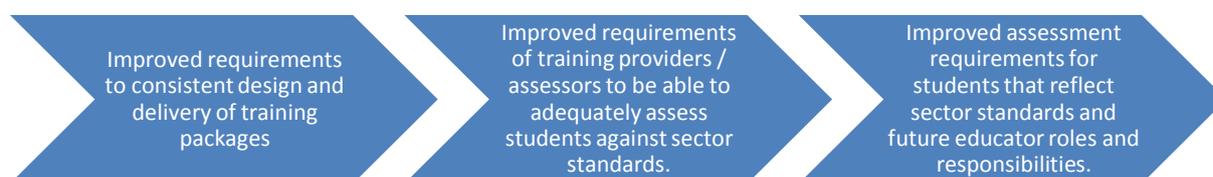
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<sup>3</sup> See <http://www.earlychildhoodaustralia.org.au/our-publications/eca-code-ethics/#preamble>

ACCS believes that alongside the consideration of an improved and stronger focus on assessment, the issue of design and delivery of training packages must also be addressed. As stated in the discussion paper, *training packages are not curriculum and do not prescribe the way training is delivered to an individual*. This means that while training providers are able to design and deliver the skills and knowledge identified in the training packages as they see fits with individual learner and /or employer needs, the gap in the number of employable sector ready educators grows.

In addition to the points above, ACCS recommends that the capabilities of assessors is also addressed in direct relation to any improvements made to the focus of assessment of students. In the recent ECA survey<sup>4</sup> a respondent states that *trainers do not understand and therefore do not engage with the complex underpinning knowledge that is inherent in the training package but focus on demonstration of skills. The underpinning knowledge and theoretical understanding of the trainers is insufficient in many aspects to adequately build this in the students they are working with.* (Member of teaching staff at a university, Vic)

ACCS believes that to enable a training system to adequately meet the needs of sector, employers and individual learners, assessment requirements must be firmed up with the following key aspects addressed.



ACCS acknowledges the development of the *Companion Volumes*<sup>5</sup>; however, we still have serious concerns around the non-compulsory status of these documents. ACCS would expect any registered training organisation that includes the education and care training packages into their scope of delivery, should be committed to the delivery of high quality training to support the provision of quality education and care for all children and families in Australia. Sadly, anecdotal evidence gathered at network meetings, in-services and through discussions with members proves this to not be the case.

ACCS believes that sector experts should be consulted extensively to discuss further the assessment requirements needed for a learner to be sector ready and moreover, the capability of those conducting the assessments.

For any further discussion regarding this submission, please contact:  
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<sup>4</sup> See: <http://www.earlychildhoodaustralia.org.au/wp-content/uploads/2014/01/ECA-Submission-to-the-VET-Inquiry-CE1.pdf>

<sup>5</sup> See: <http://www.cshisc.com.au/develop/industry-qualifications-training-packages/qualifications-under-review/childrens-youth-services/>

## Appendix 1: 2012 submission to the Qualifications review for the Children's Services Sector

### Introduction

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CCC welcomes the opportunity to provide feedback on the review of the children's services training packages draft one; and would like to highlight the critical place this review has alongside the first year of implementation of the national quality reform agenda for the education and care sector (including both early and middle childhood).

1 January 2012 saw the commencement of formal implementation of the National Quality Framework which is, 'a once-in-a-lifetime opportunity to begin the process of reform and improvement' (Early Childhood Australia [ECA] n.d., p. 1<sup>6</sup>) for all education and care services across Australia. A vital aim of the reform is to see more qualified staff in the education and care sector to support the provision of quality education and care that all children and families deserve.

### CS&HISC discussion questions

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In response to **discussion question one** 'Do you think children's services job roles changed over the past 2-3 years?' and in reflection of comments above; we believe it is evident that changes in job roles have occurred. Whilst the formal implementation of the National Quality Framework began at the commencement of 2012, introduction of national learning frameworks for both early childhood and school age care were introduced prior to this date.

Both the Early Years Learning Framework: Belonging, Being & Becoming (2009) and the Framework for School Age care: My Time, Our Place (2011) require educators to critically reflect on their pedagogy (professional practices) as the frameworks present the education and care sector with informed practice principles and learning outcomes that support both the education and care of all children. The frameworks promote the shift from check listing developmental milestones to understanding, supporting and implementing the well-researched benefits of play based learning that holistically supports individual children's wellbeing, learning and development.

Quality area one of the National Quality Standards<sup>7</sup> requires education and care services to utilise an approved learning framework to inform the development of a curriculum (program) that enhances each child's learning and development. As both the frameworks and the national quality standards were introduced in the past 1 – 3 years; current job roles require some fundamental changes in practice to that which were required of educators 3 years ago.

In response to **discussion question two**, 'Do the qualifications still reflect the job roles?', We acknowledge that draft one of the training packages currently under review is part of a process to ensuring closely aligned training packages with actual job role requirements. However, we believe it is important to reflect on evidence to drive home the importance of education and care training packages being explicitly aligned with actual job roles.

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<sup>6</sup> Early Childhood Australia n.d., 'Our future on the line: keeping the early childhood education and care reforms on track', retrieved 13 December 2012, [http://www.earlychildhoodaustralia.org.au/pdf/our\\_future\\_on\\_the\\_line.pdf](http://www.earlychildhoodaustralia.org.au/pdf/our_future_on_the_line.pdf)

<sup>7</sup> See <http://acecqa.gov.au/national-quality-framework/national-quality-standard/>

The Australian Community Children's Services [ACCS], the peak body representing Australia's not-for-profit community owned children's services, recently conducted the first wave of the 'Trends in Community Children's Services Survey'<sup>8</sup>. Results of particular importance in response to discussion question two are;

- Forty-one per cent of services that had recently recruited reported that the field of applicants were of a low or very low standard. Nearly half reported satisfactory fields but only six per cent reported the field being of a high or very high standard.
- The top three factors that make recruitment difficult were the low wages in the sector, applicants for positions not being suitably skilled or qualified and the undesirable working hours.
- Services raised issues with the quality of qualifications and issues with RTOs. One respondent said that "training organisations need to consider the well-being of the children first and foremost... incompetent staff means lack of quality".

The statistics above, combined with evident changes in what is required in the provision of quality education and care as discussed earlier, would suggest that current qualifications/training packages need substantial updating to ensure newly graduated educators are best equipped to know, understand and implement all that is required of their job role.

In response to **discussion question three**, 'What critical changes are needed to assist the industry in meeting its skills needs?' we provide the following general and more specific unit of competency feedback.

General

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### **1. Streamlining: The New Design Model**

CCC wishes to acknowledge the benefits of the new design model, in particular the structure to easily identify unit of competencies and their associated assessment requirements. Clear, direct and simple layout of content avoids the use of unnecessary jargon and makes for easy understanding helping to eliminate any possible confusion around unit of competency requirements and associated assessments.

Whilst CCC can look to the benefits of the yet to be developed Companion Volumes; we have serious concerns around the non-compulsory status of these documents. CCC would expect that any registered training organisation that includes the education and care training packages into their scope of delivery, should be committed to the delivery of high quality training to support the provision of quality education and care for all children and families in Australia. Sadly, anecdotal evidence gathered at network meetings, in-services and through discussions with members proves this

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<sup>8</sup> See <http://www.ausccs.org.au/index.htm>

to not be the case. Therefore, added to our concern is the time and resources that will go into companion documents that may not result in the adequate and valued use of them.

In reference to the above, again we wish to highlight the critical place the qualifications/training package review has during a time of such significant reform and change for the education and care sector. CCC appreciates the requirements for deadlines to each component of the review, however rushing it may affect the potential success such a significant review can and will have nationally.

## **2. Consistent language**

The use of consistent language ensures that all in the education and care sector have a common understanding of the required resources and documents (including regulations, law acts and the learning frameworks) to support and implement quality education and care. Furthermore, preparing students with common and consistent language during training supports the transition from being newly graduated to being a competent and valuable educator.

Draft one of the training packages refers to Belonging, Being and Becoming the Early Years Learning Framework for Australia as 'Early Years Learning Framework' however; the reference to the School Age Framework in Australia is referred to as 'My Time, Our Place'. Recommendation is that throughout all relevant units of competencies and associated documents, the frameworks are referred to as;

- The Early Years Learning Framework for Australia
- The Framework for School Age Care in Australia

When specifically referring to legislation, it is recommended that throughout all relevant units of competencies that the term 'relevant legislation' or more specifically naming the legislation where applicable is used;

- Education and Care Services National Regulations
- Education and Care Services National Law Act 2010

The term Educator is a valued and nationally consistent term to refer to practitioners who provide education and care to early childhood and school age care children in Australia; including the planning and implementing of programs that support children's wellbeing, learning and development. Recommendation is that terms such as staff, worker are used in a relevant manner and not to describe anyone who has a role of planning and implementing programs that support the wellbeing, development and learning of all children.

Similarly to the above, the term Education and Care Service is a nationally consistent and valued term used to validate and describe the education and care that services (and educators) provide to all children from birth to school age care across Australia. Recommendation is that the term children's services be replaced with the term education and care service.

The term 'activities' is outdated and when used often demeans the intentional teaching, learning and development that is carefully planned for when setting up learning environments and experiences. For

early childhood education and care recommended terminology is: learning experiences; and for school age care, recommended terminology is: play and leisure experiences.

Specific

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**CHC3XXXX Certificate III in Children's Services**

**CHC4XXXX Certificate IV in Children's Services (Outside School Hours Care)**

**CHC5XXXX Diploma of Children's Services (Outside School Hours Care)**

**CHC5XXXX Diploma of Children's Services (Early Childhood Education and Care)**

Recommendation (in the reflection of using consistent language) is that the qualification titles above be renamed as;

**CHC3XXXX Certificate III in Education and Care**

**CHC4XXXX Certificate IV in Education and Care (School Age Care)**

**CHC5XXXX Diploma of Education and Care (School Age Care)**

**CHC5XXXX Diploma of Early Childhood Education and Care**

**CHC3XXXX Certificate III in Children's Services:** Qualification description

This qualification description needs updating to ensure use of consistent language as previously discussed, to adequately describe the job role of an educator who has obtained the Certificate III. Furthermore, description should reflect the content of resources and documents (such as learning frameworks) that educators will be expected to use when implementing learning and development experiences. For example, in the draft it refers to facilitating experiences that enables children to 'achieve developmental outcomes'; this should also include consideration of enabling children to achieve learning (and developmental) outcomes.

**CHCCN301B Ensure the health and safety of children**

This unit of competency (U.O.C) reflects strongly the Education and Care Services National Regulations; in particular, Part 4.2 Children's health and safety, and Part 4.3 Physical environments. Reference to legislative requirements is made in multiple terms, such as; recognised state/territory regulations and requirements, legal requirements and regulations, legislative requirements and accordance with requirements. Recommendation is that one term is decided upon such as 'relevant legislative requirements' to ensure clarity for such an important U.O.C. Furthermore, it is recommended that all U.O.C's (in all children's services training packages under review) use the same chosen term where applicable.

Similar to the above, the terminology used to refer to services policies and procedures is inconsistent throughout. Terminology such as organisational policies, according to policies and procedures, organisation guidelines, organisation requirements are used. Recommendation is that one clear terminology, such as in accordance with 'service policies and procedures' are used to ensure consistency. Recommendation is also made that all U.O.C's in all training packages under review, use the same terminology where applicable.

### **CHCCN305B Provide care for babies**

CCC is very pleased that this U.O.C has been included in all early childhood education and care related training packages. Understanding the whole child is critical in being able to provide responsive and appropriate care and education, with a clear idea of what prior knowledge and experiences each child brings with them to the service.

### **CHCXX301A Support the implementation of an age appropriate learning framework**

CCC is also pleased to see the inclusion of this new U.O.C. However, a recommendation is that the unit be renamed 'support the implementation of an approved learning framework'. This is consistent with Education and Care Services National Regulations and Law Act, and also supports planning for children's transition to school.

We wish to highlight element 4.7 – *Reflect with children on what and how they have learned*: This a clear reference to the purpose of the national learning frameworks and is a theme we would like to see throughout all associated U.O.C's and assessment requirements.

### **CHCPR301C Provide experiences to support children's play and learning**

Whilst this U.O.C contains fundamentals such as creating stimulating and appropriate environments to foster development, play and learning; some further work could go into the rewriting of this unit to ensure true connections to the national learning frameworks that educators will be expected to use in the education and care setting.

As discussed previously, the national learning frameworks promote play based learning experiences that supports children's learning, wellbeing and development and extends beyond a checklist of developmental milestones. For educators to adequately fulfil job role requirements in the education and care setting, it is critical this U.O.C reflects the practices, principles and learning outcomes in the learning frameworks.

### **CHCPR303D Develop understanding of children's interests and developmental needs**

Recommendation is to consider renaming to 'Develop understanding of children's interests, wellbeing and developmental needs' to make stronger connection to the national learning frameworks.

Equally important to gathering information about children's needs and interests is how this is documented to inform program planning cycles and to share with children and their families. Further edits to this U.O.C should include reference to program planning cycles, and how documented information should be used to inform individual program plans and learning experiences for all children.

### **CHCCHILD401A 'Assessment Requirements' for CHCCHILD401A – Identify and respond to children and young people at risk**

In 120 hours of work placement it is highly unpredictable that three separate occasions of children and young people being at risk will occur. However, CCC believes that students need to

gain knowledge and understanding that will be translated into real workplace situations. It is important that workplace experience is carried out over substantial timeframes to ensure greater opportunity to practice identifying, recording and reporting children and young people at risk of harm.

Whilst CCC advocates for real workplace experiences, we understand that in some cases the CS&HISC may deem the use of case studies or scenario's as appropriate. CCC would strongly advise that the CS&HISC seek the advice of education and care services to gather the most accurate and likely event that students may face as newly graduated educators; only as a last resort if an appropriate amount of situations do not present themselves during work placements.

Regarding resources for use, students completing this unit would benefit from reading and understanding the Early Childhood Australia [ECA] Code of Ethics<sup>9</sup>, to gain foundation information on the ethical requirements of education and care professionals.

#### **CHCCN301B 'Assessment Requirements' for CHCCN301B – Ensure the health and safety of children**

Under resources it is highly recommended that assessment must include the use of the Education and Care National Regulations (and Law Act where applicable).

#### **CHCCN302A 'Assessment Requirements' for CHCCN302A – Provide care for children**

Under knowledge evident it discusses the use of 'relevant national quality framework areas' this should more explicitly state relevant national quality standards. The National Quality Standards should also be listed under resources.

#### **CHCCN303A 'Assessment Requirements' for CHCCN303A – Contribute to provision of nutritionally balanced food in a safe and hygienic manner**

Both the National Quality Standards and the Education and Care National Regulations and Law act have important information for students to know, understand and implement as a newly graduated educator. For this reason, these documents should also be listed under the resources that must be used for assessment.

#### **CHCCN305B 'Assessment Requirements' for CHCCN305B – Provide care for babies**

CCC would recommend that due to the complex and varied needs of babies that more than three situations to demonstrate provision of care be carried out.

Reports provided to CCC anecdotally, highlight the dangers babies and young children are placed in when newly graduated educators are not familiar with changing a real (not a doll) baby's nappy. It is critical that this is a task explicitly required and should be included in both the assessment requirements and the associated U.O.C. content information.

#### **CHCXX301A 'Assessment Requirements' for CHCXX301A – Support the implementation of an age appropriate learning framework**

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<sup>9</sup> See [http://www.earlychildhoodaustralia.org.au/code\\_of\\_ethics/early\\_childhood\\_australias\\_code\\_of\\_ethics.html](http://www.earlychildhoodaustralia.org.au/code_of_ethics/early_childhood_australias_code_of_ethics.html)

Quality Area One of the National Quality Standards; Educational program and practice is critical to supporting the implementation of an approved learning framework and therefore CCC recommend that the National Quality Standards be listed as a resource that must be used for assessment.

### **CHCIC301E 'Assessment Requirements' for CHCIC301E – Interact effectively with children**

Interacting and communicating effectively with children is paramount to working with and understanding children's individual and group needs, interests and wellbeing. CCC recommends that documented evidence of this occurs over more than three situations and involves both individual and groups of children.

### **CHCPR301C 'Assessment Requirements' for CHCPR301C - Provide experiences to support children's play and learning**

\*Please also see previous U.O.C content feedback

As previously discussed, assessing children's wellbeing, learning and development requires significantly more than check listing developmental milestones. Furthermore, it is critical that there are requirements for students to understand and make links between observing, documenting and assessing children's interests and needs, not just age/stage milestones.

As reflected in national learning frameworks, national quality standards and national regulations; ensuring children are supported to know, understand and learn about sustainable practices for a better future is vital. Therefore, it is critical that performance and knowledge evidence reflects this.

### **CHC4XXXX Certificate IV in Children's Services (Outside School Hours Care): Qualification description**

This qualification description needs updating to ensure use of consistent language as previously discussed, to adequately describe the job role of an educator who has trained and obtained knowledge to work with school age children. Furthermore, description should reflect the content of resources and documents (such as the framework for school age care) that educators will be expected to use when implementing play and leisure experiences. For example, in the draft it refers to facilitating experiences that enables children to 'achieve developmental outcomes'; this should also include consideration of enabling children to achieve learning (and developmental) outcomes and to support children's wellbeing.

### **CHCOSH401A Support children to participate in outside school hours care**

Recommendation is to rename to 'support children to participate in school age care'. As per comments regarding qualification description above, it is important that this U.O.C truly reflects the framework for school age care and relevant national quality standards.

### **CHCOSH402B Develop and implement activities in outside school hours care**

Recommendation is to rename to 'develop and implement play and leisure experiences in school age care'. This U.O.C needs significant edits to ensure consistent language is used to support clear understanding of care and education provision in the school age care setting. Reference to reflective practice and program planning cycles should be included in performance criteria's.

### **CHCOSH403B Work effectively with children in outside school hours care**

Educators working with school age care children are required to collaborate with and engage in respectful interactions with all children. It is recommended that this U.O.C be renamed to reflect this; such as 'Work collaboratively and respectfully with all children in school age care'.

Once again, language used throughout this U.O.C needs to be reviewed and updated in reflection of the framework for school age care, national quality standards and national regulations.

### **CHCOSH401A Assessment Requirements for CHCOSH401A - Support children to participate in outside school hours care**

\*Please also see previous U.O.C content feedback

Under performance evidence we are unsure as to why only language development environments have been suggested. CCC recommends that students plan, implement and assess at least two indoor and two outdoor learning spaces to support children to participate in school age care.

### **CHCOSH402B Assessment Requirements for CHCOSH402B – Develop and implement activities in outside school hours care**

\*Please also see previous U.O.C content feedback

CCC recommends that students plan, implement and assess at least two indoor and two outdoor play and leisure experiences to support groups and individual children to participate in school age care. In addition to 'using writing skills to prepare reports on activity or program outcomes', as discussed under performance evidence; requirements to use a range of documentation and assessment methods should also be listed.

### **CHCOSH403B Assessment Requirements for CHCOSH403B - Work effectively with children in outside school hours care**

\*Please also see previous U.O.C content feedback

Demonstrated evidence should also include individual interactions with children, not just groups. The ECA Code of Ethics is also a relevant resource that should be listed to support the assessment of this unit.

### **CHC5XXXX Diploma of Children's Services (Outside School Hours Care): Qualification description**

This qualification description needs updating to ensure use of consistent language as previously discussed, to adequately describe the job role of an educator who has trained and obtained knowledge to work with school age children. Furthermore, the reference to National Standards for Outside School Hours Care should be deleted (National Standards for OSHC have been superseded by Education and Care National Regulations and Law Act) and replaced with relevant legislative requirements.

**CHCFCXX5 Foster cognitive development in childhood**

**CHCFCXX2 Foster physical development in childhood**

**CHCFCXX3 Foster social development in childhood**

**CHCFCXX4 Support emotional and psychological development in childhood**

Whilst the above developmental areas of childhood are important to know, understand and plan for; it is critical that U.O.C content supports educators to identify ways to foster developmental needs in a play based learning environment. For newly graduated educators to competently fulfil job role requirements and address program planning cycles that support the holistic wellbeing, learning and development of all children, play based learning knowledge is important.

**CHCIC501A Manage children's services workplace practice to address regulations and quality assurance**

In the vein of consistent language, both the title and content of this U.O.C needs to be addressed, including the use of exact name of legislative documents and national quality standards that education and care services are required to comply with and implement.

**CHCPR501B Design, implement and evaluate programs and care routines for children**

As discussed throughout previous U.O.C feedback, it is important that designing, implementing and evaluating programs and routines is developed using a clear and appropriate program planning cycle that also supports the implementation of national learning frameworks. Furthermore, program plans and routines must also address children's needs and interests, not just development milestones and adults' assumptions of what children should be provided with. This U.O.C should be reviewed to ensure it meets the intent of program and routine planning and evaluating as discussed.

**CHCRF511A Work in partnership with families to provide appropriate care for children**

Job role requirements of educators are to ensure that they provide more than just 'appropriate' care. Educators will be required to collaborate with families and work in partnership with, to ensure care for children is responsive of both the child and family's needs and interests. Therefore, the title of this U.O.C should be reviewed and furthermore all content reflective of the needs to collaborate with families.

**CHC5XXXX Diploma of Children's Services (Early Childhood Education and Care):** Qualification description

This qualification description needs updating to ensure use of consistent language as previously discussed, to adequately describe the job role of an educator who has trained and obtained knowledge to work with children in the early years.

**CHCPR502E Organise experiences to facilitate and enhance children's development**

In the vein of consistent language and adequate reflection of the national learning framework and national quality standards the title of this U.O.C needs to be updated and as such content should be

reviewed. Suggested U.O.C title is 'Plan and implement learning experiences to support the learning, wellbeing and development of all children'.

### **CHCPR509A Gather, interpret and use information about children**

Whilst the content of this U.O.C contains important aspects of gathering documentation and working with others (such as families, colleagues) the title should be updated to reflect language consistent with national learning frameworks and national quality standards. Educators will be required to reflect upon such documents to support the documenting and assessing of children's learning and development.

Electives

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### **CHCPR302A Support sustainable practices**

Quality Area one and three of the National Quality Standards and Learning outcome two: Children are connected with and contribute to their world (in the National learning frameworks) refer to practices that educators and services should adopt to support children's understanding, growing respect and knowledge of sustainable practices for a better future. CCC recommends that this elective become a core unit of competency in each education and care qualification training package.

### **CHCPR515A Develop and implement a program plan to support sustainable practice**

CCC recommends that this U.O.C be combined with CHCPR302A

### **CHCIC511A Implement and promote inclusive policies and procedures in children's services**

CCC believes that building strong communities requires the development of and commitment to cultural competence and awareness, and that inclusive practice should always be at the forefront of providing quality education and care for all children and families. CCC recommends that this unit become a core unit in each education and care qualification training package.

### **CHCIC302A Support Aboriginal and/or Torres Strait Islander families to participate in children's services**

Quality area six of the national quality standards call on services and educators to raise awareness of Aboriginal and Torres Strait Islander communities, including the acknowledgment of traditional owners of the land and local elders. Furthermore, principle four of the national learning frameworks 'respect for diversity' expects educators to recognise that diversity contributes to the richness of society. In Australia, this includes promoting greater understanding of Aboriginal and Torres Strait Islander ways of knowing and being. CCC has a commitment to understanding and promoting diverse cultures and respected ways of knowing and being, and would strongly recommend that this U.O.C be a core unit in all education and care qualification training packages.

### **CHCNN520C Advocate for the rights and needs of children and young people**

The national learning frameworks, national quality standards, national regulations, the ECA Code of Ethics and the UN Convention on the Rights of the Child are all documents that require people to

understand, consider and advocate for the rights and needs of all children and young people. CCC strongly advocates for quality care and education for all children and families and supports educators to have a voice to ensure provision of quality care and education. CCC strongly recommends that this U.O.C be a core unit in all education and care qualification training packages.

## Conclusion

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CCC once again wishes to acknowledge how timely the qualifications training package review is and point out what a historical point in time this is alongside the vital education and care national reform agenda, including the recent implementation of the National Quality Framework.

Furthermore, we wish to highlight the significant place the review has alongside the 'Early childhood education and care workforce strategy for Australia: 2012-2016'<sup>10</sup>.

The workforce strategy seeks to increase the level of qualifications in the ECEC workforce. As discussed in the strategy, CCC supports the belief that well-trained and qualified ECEC educators with current, relevant and appropriate skills and knowledge are essential for the provision of quality care and education and outcomes for all children. Furthermore, the importance of high quality, well-trained educators is epitomised throughout the National Quality Framework and all its components.

CCC supports the CS&HISC during the review of the qualifications training packages but cannot stress enough that such a significant review cannot be rushed if it is to be successful, support the Nation's vital ECEC reforms and workforce strategy, and furthermore, support a future of quality educators, enabling them to deliver high quality care and education to all children and families.

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<sup>10</sup> See: <http://deewr.gov.au/early-years-workforce-strategy>

## Appendix 2: ACCS submission to the Discussion Paper – Towards a Contestable Model

22 December 2014

### Introduction

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ACCS as the national peak body for the not-for-profit children's services sector welcomes the opportunity to provide feedback to the Industry Engagement in Training Package Development - Discussion Paper: Towards a Contestable Model. ACCS would also like to highlight that any new approaches to the development and maintenance of training packages, particularly in relation to the children's services sector (early and middle childhood education and care) considers the recent work undertaken by the Community Services and Health Industry Skills Council (CS&HISC).

We note that in the discussion paper: towards a contestable model, the discourse is to use the term 'industry'. However, in the early and middle childhood education and care sector we do not manufacture a product and hence do not refer to an industry but rather a sector; the term sector is used from here on.

In July 2013, new and updated qualifications for the children's services sector were endorsed by the National Skills Standards Council (NSSC). ACCS was a significant contributor to the industry consultations (including representation on the subject matter experts group) led by the CS&HISC, which resulted in some significant improvements to the qualifications / training packages for children's services. A core aim of the reform of qualifications / training packages was to see more qualified staff in the early and middle (OSHC) childhood education and care sector to support the provision of quality education and care that all children and families deserve. This cannot be achieved without authentic and ongoing sector engagement; led by a reputable and committed body.

### Response to proposed options

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ACCS believes that two of the most critical aspects of all qualifications for the children's services sector are:

1. Current/responsive: Training Packages must be kept up to date to ensure that VET learners are trained and assessed as competent in skills that are aligned to current sector needs.
2. Contextualised: Training Packages across different occupations and industries will share some common skills, but these competencies must be flexible and have a sector-specific context so they are of value to our sector.

Furthermore, ACCS believes that any organisation / body responsible for the development and maintenance of the training packages must be:

1. Trustworthy/reputable: Training Packages provide an underpinning level of quality that students and employers can trust, and thereby allow the national training system to function effectively. In addition to this, the sector relies on the ongoing, transparent and authentic

engagement process undertaken by the relevant body to ensure that training packages accurately reflect sector needs rather than perceived needs.

2. Committed: to effective and considered consultation and sector engagement. It is critical that the organisation / relevant body are committed to working with recognised peak bodies within the early and middle childhood education and care sector. This is a must, to ensure that any streamlining of packages or development of new qualifications is in line with government reforms in the early and middle childhood and VET sectors and reflects the current role of the educators.

The early childhood education and care sector is underpinned by important theoretical perspectives that guide quality practices. It is for this reason that authentic and considered engagement and consultation with the tertiary sector must also occur.

3. Able to respond effectively and efficiently when sector changes determine the need for updates to training packages. The early and middle (OSHC) childhood education and care sector is undergoing a number of significant reviews that could result in a need for review of the current training packages. To ensure continuity of quality and sector ready educators, the relevant organisation / body responsible for the review and update of training packages must be able to undertake this process in an appropriately responsive manner.

ACCS has reviewed the three approaches for a new contestable model and supports Approach 3 with considerations to some further improvements. At this point, we would like to acknowledge the CS&HISC and their work that we believe aligns closely with Approach 3.

ACCS firmly believes that Approach 3 should be the preferred option and furthermore, that the current CS&HISC be the provider of this approach, for the following key reasons:

- We believe that the CS&HISC has the attributes required (as we highlight above) to ensure that training and qualifications for the children's services sector will ensure both a quality and efficient workforce and training system for educators, employers, children and families.
- We believe the CS&HISC has a solid foundation for the work required to ensure the outcomes outlined in Approach 3 are best achieved.
- The CS&HISC has demonstrated in a number of ways, their capability to engage with a range of sector peaks, stakeholders and service providers to ensure a well-informed approach to any updates to training packages that reflects current sector needs.
- We believe retaining the CS&HISC will be a more cost effective approach, enabling more funds/resources to be able to go into stream lining processes such as the endorsement of training packages. ACCS sees the benefit in the development of a committee to oversee the endorsement of training packages and believes that this avenue will streamline and strengthen the processes already undertaken by the CS&HISC.

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