

The Community Services and Health Industry Skills Council Submission:

Productivity Commission Draft Report on Childcare and Early Childhood Learning

September 2014

The Community Services and Health Industry Skills Council (CS&HISC) is the peak agency responsible for developing Vocational Education and Training (VET) qualifications and setting national standards for a broad range of job roles in the Community Services and Health industry. Over 80,000 publically funded students are awarded a Health or Community Services qualification each year. In addition to qualifications, CS&HISC provides advice, services and products to support the development of the overall community services and health workforce.

CS&HISC has an interest in Childcare and Early Childhood Learning, particularly in relation to workforce development and training. The following comments concern the Productivity Commission's draft report on Childcare and Early Childhood Learning in relation to effective workforce planning and development.

We would welcome the opportunity to discuss the comments in this submission in person.

Importance of effective workforce planning and development

ECEC services depend on the availability of suitably qualified staff. The staff ratios and qualification requirements in the NQF broadly define the number workers, by level of qualifications required to deliver ECEC services based on level of demand. It should be recognised that the NQF is therefore a tool for workforce planning. It should also be acknowledged that the decision to introduce a minimum qualification requirement was based on the understanding that employing VET qualified ECEC staff improves outcomes for children and families.

While the draft report includes a chapter on the early childhood education and care (ECEC) workforce it lacks much in the way of definitive findings and recommendations on responding to workforce demand.

The final report should describe the potential impact of any proposed changes on workforce demand. For example, chapter 7 also discusses the possibility of changing the NQF staff ratio and qualification requirements and adjusting the ACECQA approval processes for qualifications. *Draft Recommendations 7.3¹ and 7.4²* recommend nationally consistent adoption

¹ DRAFT RECOMMENDATION 7.3

Differences in educator-to-child ratios and staff qualification requirements for children under school age across jurisdictions should be eliminated and all jurisdictions should adopt the national requirements.

² DRAFT RECOMMENDATION 7.4

Governments should develop and incorporate into the National Quality Framework a nationally consistent set of staff ratios and qualifications for those caring for school age children in outside school hours and vacation care services. These requirements should take into consideration ratios that are currently acceptable for children during school hours, the uncertainty surrounding the additional benefits of more

of the staff ratios and qualification requirements. Exactly how these changes will impact on how many workers and with what skills and qualifications needs to be defined in the final report.

According to the literature, a best practice approach to workforce planning and development is strategic and holistic. This means addressing workforce issues through a combination of different actions and measures, coordinated to achieve clear objectives. These measures might include:

- improved attraction, recruitment and retention
- more effective training pathways including recognition of prior learning
- appropriate skills development through quality training
- funding for training and incentives to train.

Attraction, recruitment and retention

Chapter 11 of the draft report includes a great deal of evidence on recruitment and retention difficulties experienced by ECEC employers as well as workforce shortages in the sector. This is supported by feedback CS&HISC has received from industry. Given the significance of the problems described, it would be helpful if the final report could make some recommendations in the area of attraction, recruitment and retention.

The report discusses the evidence regarding the link between low wages and high turn-over of staff. However, the report doesn't come to a clear conclusion about the relative impact of low wages on recruitment and retention, or any specific recommendations to address the impact low wages are having.

It is noted that the draft report recommends measures to encourage and enable increased participation for overseas workers in the ECEC workforce³. The draft report also mentions the potential to increase the supply of potential workers through incentives for retired teachers to re-enter the workforce, measures to encourage more young people to enter the sector and various incentives to train. However, without national coordination and strategic oversight these measures are likely to have less impact. To this end, the section on what governments can do to support recruitment and retention (p492-4) should include clearer recommendations, and emphasise the importance of national strategic coordination.

staff and higher qualifications, and the valuable contribution that can be made to outside school hours care services by less qualified older workers and university/TAFE students.

³ **DRAFT RECOMMENDATION 7.5**

To provide services with greater flexibility to meet staffing requirements, ACECQA should:

- *remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months*
- *explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.*

All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.

The New South Wales and South Australian Governments should allow a three month probationary hiring period in which unqualified staff may be included in staff ratios before beginning a qualification, as was recently adopted in all other jurisdictions.

Effective pathways to training and employment

A holistic and strategic approach to developing the ECEC workforce should consider potential improvements to existing pathways into training and employment in the sector. The draft report mentions recent changes to the NQF and the need to improve recognition of prior learning processes, both mechanisms for supporting effective pathways into training and employment. However, the final report would benefit from a broader consideration of potential improvements in relation to pathways to employment.

Trial or probationary period

It is noted that the NQF has been amended to allow employers to hire new educators without a qualification for a three month probationary period before they need to actively enrol in a qualification. It is acknowledged that this measure may help employers and employees to make informed decisions about an individual's suitability for the sector. In doing so this may improve retention rates during training and post qualification.

Recognition of Prior Learning (RPL)

The draft report notes a lack of a consistent approach to recognition of prior learning, while also recognising the importance of RPL as a tool for supporting the recruitment and retention of appropriately skilled workers. CS&HISC agrees that having a consistent approach to RPL is important. It would be helpful if the final report could make suggestions about how a consistent approach to RPL in ECEC might be achieved. We note that there is a useful toolkit available on the Department of Education website: <http://www.education.gov.au/recognition-prior-learning-toolkit>.

The draft report also refers to anecdotal evidence that workers are leaving the sector because they do not want to make the investment of time and money required to meet NQF qualification requirements. This highlights the need not just for effective RPL but also incentives to train that recognise the disincentive of having to cover the costs of training.

Other support for effective training pathways

There is a need to work with industry to explore ways of improving the training pathways from school into careers in childcare and other sectors. Currently, high school students can complete qualifications in Children's Services and Children's Services (Outside Hours Care) through VET in Schools. This provides students aged 16 and over with the qualification they need for a career in childcare, however:

- there are concerns about the quality of some of the courses being delivered by schools
- schools often lack the strong industry partnerships required to deliver work placements
- the sector is generally reluctant to employ 16 year olds.

CS&HISC believes that these issues need to be addressed as part of an industry wide approach to identifying those with the potential and aptitude for caring roles and improving the pathways into further and higher education and training.

Skills development through quality training

The draft report includes a section on training quality and recommends the Australian Skills Quality Authority continue in its role to oversee and audit the quality of training delivered by RTOs.⁴ However, the report fails to recognise the role of national standards, included in training packages, in supporting quality and consistency. Furthermore, there are certain aspects of delivering quality training and how this is regulated that could be better addressed in the final report.

The role of national standards in ensuring quality training

Training providers' courses are designed to meet the nationally recognised standards articulated by the early childhood education and care qualifications and competency standards. So while individual training providers and their partner employers are responsible for delivering quality training, national standards help ensure the training is fit for purpose. By defining the competencies graduates require for a job-role, the national qualifications set a national standard to support consistency and quality.

The draft report fails to mention the role of national training standards or the recent review of early childhood education and care qualifications to better align the national standards in this area to the requirements of roles on the ECEC sector.

As well as highlighting the role of national standards in ensuring training is fit for purpose the final report should also acknowledge the contribution recent changes to early childhood education and care qualifications have made to addressing some of the quality issues identified. For example consideration of diversity, including cultural competencies has been incorporated into all new qualifications, which responds to the need to support trainees from culturally and linguistically diverse backgrounds (see page 497 of the draft report).

Other changes incorporated into the new early childhood education and care qualifications that will support quality training include:

- an assessment guide has been included for the first time to support training providers in this area
- work placements are now mandatory, ensuring students are exposed to structured work place learning and assessment (see page 6 of this response for detail on the benefits of structured work place learning and assessment)
- a unit on implementation strategies for the inclusion of all children covers the competencies required for supporting children with disabilities and additional needs (responds to the need identified on p497 of the draft report).

Role of ASQA in ensuring quality training delivery

⁴ **DRAFT RECOMMENDATION 11.1**

Governments should ensure, through regulatory oversight and regular audits by the Australian Skills Quality Authority, that Registered Training Organisations maintain consistently high quality standards in their delivery of ECEC-related training.

Good regulation supports quality in a training as well as service context. CS&HISC believes that it is important to identify poor quality courses (e.g. very short courses with no practical experience) as part of effective quality management processes. CS&HISC is on the ASQA steering committee for the audit of early childhood training.

In understanding the implications of the as yet unpublished ASQA review of training for the Childcare and Early Childhood Learning sector more consideration should be given to the proportion of non-compliant providers that were able to quickly and easily resolve any non-compliance issues. Of the 37 providers initially found to be non-compliant 28 were able to rectify any issues, leaving on 9 non-compliant providers. Early indications are that poor practice in assessment was a theme for this review.

This is similar to the findings of last year's review of training in the Aged Care sector. The fact that so many were able to easily make amendments once advised may be an indication that some providers did not fully understand how certain standards should be applied. This would suggest the need for ASQA to provide more support RTOs in understanding what is required. The early evidence of poor practice in assessment reinforces the need for support and guidance on best practice assessment, like the assessment guide that now accompanies the new early childhood education and care qualifications.

Delivering quality workplace training

Workplace training is a defined period of structured and supervised on the job learning, practice and experience which is assessed against defined criteria. CS&HISC agrees that workplace training is an essential component to quality education and training. However, there is some ambiguity in the draft report around what constitutes workplace training that needs to be addressed.

At times the report uses terms like 'trial periods' or 'probation' as synonymous with workplace or on the job training. For example trial periods are equated to formal apprenticeships (p498) and a pre-training probationary period equated to on the job training without any indication of there being any training or structure to the probationary period involved.

The final report should define what is meant by workplace/ on the job training. Where it refers to probationary or trial periods that do not involve structured and supervised learning and assessment the distinction from workplace training should be made clearer. Furthermore, the final report would benefit from some discussion of how to better incentivise employers to provide work placements.

Funding for training and incentives to train

CS&HISC agrees that ongoing learning through professional development is important for ECEC workers in order to maintain and improve their skills and ensure they remain up-to-date with the latest information and research about children's learning and development. Ongoing professional development should be part of a wider skills development strategy that requires funding support mechanisms that provide appropriate levels of support to individuals and their employers.

Chapter 11 of the draft report discusses funding for training including incentives to train. This discussion mainly related to three areas.

1. Developing knowledge and skills required to support children with disabilities and additional needs. The third part of *Draft Recommendation 12.6* relates to funding that is specific to training to support children with additional needs.⁵
2. Funding to support participation in national training to facilitate compliance with the NQF staff ratios and qualification requirements. Under government support for training (p496-8) the draft report notes that the Australian Government has provided funding to the states and territories to support the levy free provision of childcare diplomas and advance diplomas. This funding is due to expire on 31 December 2014.
3. Redirection of funding to support the professional development of long day care educators. Box 11.3 on the *Early Years Quality Fund* (EYQF) notes the intention to re-direct 'available' funding from the EYQF to a new 'program to support the professional development of all educators in long day care services', the *Long Day Care Professional Development Program* (LDCPDP) is then described in Box 11.9.

Developing knowledge and skills required

The final report would also benefit from considering what skills and knowledge should be considered priorities for development as well as how many of which qualifications need to be awarded. This skills-based approach to planning and prioritising the allocation of funding for training will help improve the overall capability of the ECEC workforce. As discussed, a unit on implementation strategies for the inclusion of all children has been included in the new early childhood education and care qualifications. This covers the competencies required for supporting children with disabilities and additional needs.

In addition, other priority areas for skill development include:

- leadership and management skills, to support service providers to respond to changes in policy, regulatory requirements and increased service demand and expectations
- Language, Literacy and Numeracy (LLN), which is anecdotally a skills development priority for the childcare workforce, may become an even higher priority if mechanisms to recruit more overseas workers are introduced.

⁵ DRAFT RECOMMENDATION 12.6

The Australian Government should establish three capped programs to support access of children with additional needs to ECEC services.

- *The Special Early Care and Learning Subsidy*
- *The Disadvantaged Communities Program*
- *The Inclusion Support Program would provide once-off grants to ECEC providers to build the capacity to provide services to additional needs children. This can include modifications to facilities and equipment and training for staff to meet the needs of children with a disability, Indigenous children, and other children from culturally and linguistically diverse backgrounds.*

Funding to support participation in national training

The draft report identifies employers and employees as key beneficiaries of training (p496). While CS&HISC does not dispute this, when considering who should pay for training consideration also needs to be given to the broader societal benefits of an appropriately skilled childcare and early childhood workforce. Furthermore, the final report needs to link the arguments around who should pay for training to the evidence concerning:

- low pay and poor conditions of workers in the sector
- the reluctance of employers to increase the costs for parents
- parents' capacity to pay increased fees.

In addition, it should be recognised that currently ECEC employers do not have any financial incentive to deliver VET work placements. Given the time and resources required to plan and deliver quality work placements CS&HISC believes that this is an area that would benefit from consideration in the final report.

Concluding remarks

ECEC services depend on the availability of suitably qualified staff. The draft report lacks definitive findings and recommendations on responding to workforce demand. The final report should be able to be used by the Australian Government to inform a national strategy for the development of the ECEC workforce. To support this, the final report should make recommendations as to how any workforce issues arising should be addressed through:

- improved attraction, recruitment and retention
- more effective training pathways including recognition of prior learning
- appropriate skills development through quality training
- funding for training and incentives to train.

The suggested measures should be presented as potential features of a strategic and holistic approach to developing the ECEC workforce.