

## **Australian Community Children's Services**

### **Response to *Early Childhood Development Workforce Productivity Commission Draft Research Report*, June 2011**

#### **1. About Australian Community Children's Services**

Australian Community Children's Services (ACCS) is the peak body representing Australia's not-for-profit community owned children's services and those who support the right of children to access these services. ACCS has branches in each state and territory throughout Australia. ACCS is committed to:

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

#### **2. General comments about this review**

ACCS is excited about this timely review by the Productivity Commission. There are significant changes occurring in the early childhood sector through the Council of Australia Governments (COAG) process and the early childhood reforms it is implementing. These changes will impact on the quality assurance frameworks applied to children's services, the regulations that underpin this frameworks and the early childhood sector workforce that will be implementing these changes.

This response to the *Early Childhood Development Workforce Productivity Commission Draft Research Report* is from a national perspective. State and Territory branches have made individual responses providing commentary from the branch perspective. It is arranged under chapter headings. ACCS has not commented on some sections of the review as the recommendations are outside the scope of nationally agreed ACCS policies.

#### **3. Government involvement in the early childhood development sector**

ACCS agrees with:

- targeting of additional funds to deliver enhanced community outcomes. This is particularly critical to ensure that families and children are not disadvantaged in accessing high quality early childhood services. The Child Care Benefit (CCB) system is an existing and secure method of providing additional assistance to low-income families to assist them better afford child care. ACCS believes that by increasing the amount of CCB low-income families receive and slightly

increasing the upper income limit many families would find child care more affordable. This increase in CCB could be funded through removal of the Child Care Rebate, which advantages high income families significantly more than low-income families;

- the Commission’s finding that market forces alone are unlikely to lead to the provision of quality early childhood development services and that an appropriate regulatory system is required, properly resourced and aimed at quality improvement and assurance. The recent collapse of ABC Early Learning is an example of the failure of market pressure to sustain and deliver financially viable, good quality children’s services;
- the publication of all relevant information on service quality, including temporary and permanent waivers that have been granted with respect to compliance with the National Quality System; and
- the dissemination of best practice models, along with measure that ensure regulatory impacts are minimal.

ACCS strongly disagrees with the view of the Commission that voluntary committees are more vulnerable or at risk. All services providers have, at different times, challenges in managing the regulatory complexity of the early childhood sector. This includes for-profit and not-for-profit services of all sizes and governance structures.

Services that are well resourced, have access to on-going training and information about regulatory changes have been, in the past, able to successfully manage extensive changes processes. This has been evidenced when the first child care national quality framework was introduced more than 10 years ago. With appropriate support training and resources, long day care centres, Family Day Care schemes and outside school hours services were able to successfully implement the changes.

Cluster management is only one of many options that could assist children’s services navigate through the changes under the early childhood sector reforms.

## **5. The preschool and long day care workforce**

ACCS supports the need to have 4-year early childhood degree qualified teachers implementing the early learning frameworks. If a 3-year-qualified teacher is employed to do this, as proposed by the Commission they must upgrade their qualification to a 4-year degree.

## **7. The outside school hours care and occasional care workforces**

ACCS does not support the recommendation of the Commission in this chapter.

ACCS strongly advocates that the same mandatory qualification requirements should apply across all children’s services including outside school hours care. Outside school hours and occasional care settings are educational, requiring staff in these services to understand child development, reflecting on the needs of the child and family and provide pedagogical experiences that suit the child, family and setting. If the Commission determines that play is “constructive” then this implies that it must also engage children in a cognitive manner.

Nor is cognitive development time limited. Learning through play occurs throughout a child’s day, including the time spent in occasional child care. The same pedagogical principles apply in occasional care as they do in long day care.

ACCS believes that all out of scope children's services should be brought under the NQF so that Australian children and families have access to the same expectation of care and education regardless of the early or middle childhood service type they are using. We welcome the 2014 review on this matter.

## **8. The early childhood education and care workforce for children with additional needs**

ACCS supports the Commission's recommendations that children with additional needs fully benefit from the early childhood reforms. Funding to cover the full cost of inclusion support staff at market rates is imperative to achieving this important objective.

Application and funding processes should be streamlined and allow for multi-year funding that provides inclusion support for all the hours a child with additional need attends a service.

The early and middle childhood workforce needs to be appropriately qualified, trained and remunerated. ACCS supports the Commission's recommendation in this area.

## **9. The early childhood education and care workforce in rural and remote areas**

ACCS fully supports the Commission's recommendations in this area.

## **10. Training the early childhood education and care workforce**

One of the key success factors for the COAG early childhood reforms will be the qualifications and experience of early and middle childhood staff working with children. Ensuring all staff have the appropriate skills, qualifications and experience is a challenge ensuring an adequate pool of potential employees and the content and quality of the courses provided.

Over the past several years ACCS has regularly been receiving reports from its members who work in children's services about their dissatisfaction with the content and delivery of VET qualifications for early childhood education and care. Newly qualified staff are employed at early education and care centres and do not have the skills to work independently with children and families using some services. ACCS has received reports that VET graduates:

- are not up to date with the current early childhood reforms including the Early Years Learning Framework and the National Quality Standard;
- are not able to document child development and observations which are integral to any educational program planning;
- sometimes have not had any practicum experience in a children's service as part of their training;
- do not have a basic understanding of appropriately guiding children's behaviour; and
- do not understand pre-literacy and pre-numeracy skills and experiences for children.

ACCS agrees with the Commission's recommendations and believe these will strengthen the VET sector.

The following are additional important considerations for the Commission.

### **Ability for the sector to provide feedback to relevant authorities regarding inadequate course content**

It is critical that early education and care sector professionals are able to provide feedback to relevant state/territory (or Australian Government) authorities that approve VET courses.

ACCS has tried to provide specific feedback to state/territory vocational training approval authorities and despite presenting specific examples of training providers, course content and inadequate training schedules have not successfully been able to present this information for action. After our initial attempt to raise these specific concerns as a children's services peak, we were informed it must be a graduate who raises concerns about their course, when we used a graduate to present the training issues we were told that it must be the employer, similarly for an employer we were told it must be the new employee. To date we have not been able to present our specific examples of training deficits to a state VET approval authority.

### **Professionally supervised relevant practicum experience**

Diverse and professionally supervised practical experience in early or middle childhood education and care services are vital to the skills and experience required to qualify as an educator. All early and middle childhood VET courses must include professionally supervised practical experience.

Staff who currently work in children services and are upgrading their qualifications most often take paid or unpaid leave to fulfil practicum requirements. This can be a disincentive to existing staff continuing to study and upgrade qualifications.

The Commission needs to consider ways that current employees who are students can be supported to continue to study and fulfil practicum requirements without being penalised in this way. It maybe possible to consider ways that the Australian Government could support paid practicums through a subsidy or reimbursement scheme.

### **Course content**

All VET courses must have current content that reflects new and emerging early education and care practices, for example NQF and Early Years Learning Framework, and include a compulsory focus on children aged from birth to less than 2 years for any early or middle childhood course.

Perhaps the audit recommendation could be broadened to consider ways that currency of course content could be determined on a regular basis.

## **11. Planning the ECE workforce**

ACCS agrees with these recommendations.

## **14. Workforce for Indigenous ECE services**

ACCS supports the Commission's recommendation regarding bringing out of scope Aboriginal and Torres Strait Islander children's services under the NQF. This will require significant investment to do so.

As the Commission recommends Aboriginal and Torres Strait Islander children's services groups must be consulted to ensure the NQF instrument is culturally relevant, and its assessors are culturally competent to partner with Aboriginal and Torres Strait Islander children's services in this process.