



**ACT**  
Government

Chief Minister and Cabinet

Our ref: 2011/12098

Ms Angela MacRae  
Presiding Commissioner  
ECD Workforce  
Productivity Commission  
LB2 Collins Street East  
MELBOURNE VIC 8003

Dear Ms MacRae

### ***Draft Early Childhood Development Workforce Report***

Thank you for the opportunity to provide comment and feedback to the Draft *Early Childhood Development Workforce Report* released on 30 June 2011.

While the full impact of the draft recommendations cannot be assessed until the Australian Government presents its response, the ACT Government welcomes the comprehensive analysis of issues relating to early childhood development workforce issues – both nationally and for individual jurisdictions.

The ACT Government has welcomed the focus under the National Reform Agenda (Reform Agenda) to improve outcomes for all children, with a particular focus on vulnerable children. The ACT Government continues to play an active role in preparing for the ACT's implementation of the *National Quality Framework* (NQF).

To date, implementation planning has progressed smoothly and the ACT Government maintains a watching brief on all major developments given the extent and significance of the reforms under the National Quality Agenda. The ACT has a number of advantages in the implementation due in part, to the comparatively small size of the jurisdiction. In particular the scale enables a collaborative approach to implementing reform both internally and with the ACT early childhood development sector.

While the ACT Government welcomes the Report and supports its overall intent, there are areas where I make specific comments or recommend additional detail be provided in the final Report. The main concern is that the draft Report appears to inadequately reflect our progress in implementing the reforms. Further detail is set out at in Attachment 1.

Further comments are also set out at attachments 1 to 6, as follows:


- Principal issues (Attachment 1)
- Draft recommendations (Attachment 2)
- Clarification of ACT position (Attachment 3)
- Detailed comments (Attachment 4)
- ACT input to Commission's Information Requests (Attachment 5)
- Minor edits to Appendix E (Attachment 6)

The ACT Government has adopted a range of evidence based approaches both in terms of infrastructure and the delivery of services and programs to enhance outcomes for young children. The ACT Government provides a strong universal platform of delivery, complemented with a mix of both locational and targeted approaches for children and their families delivered through a mix of primary, tertiary and intensive programs. On the Commission's request I am pleased to provide case study information on a number of ACT initiatives that I hope will further enrich the Report (provided at Attachment 5).

The ACT Government looks forward to reviewing the Commission's final report into the early childhood development workforce. Should you have any queries or wish to discuss further any issues I have raised, please contact Ms Pam Davoren, Deputy Director-General, Policy and Cabinet on (02) 6207 6136.

Yours sincerely

Andrew Cappie-Wood  
Head of Service

 September 2011

### **Principal issues**

#### *ACT progress under the Reform Agenda*

The draft Report identifies that the ACT will need to make more substantial progress to meet staff to child ratios specified under the *National Quality Framework*. The ACT regards this statement as misleading and requests that it be revised to reflect actual progress (as indicated below).

Substantial progress has been achieved to date and confidence has been expressed throughout the early childhood development sector in meeting reform objectives. The ACT currently meets all but one of the staff to child ratios required- ratio requirements for the birth to 2 years category. Around 40 per cent of child care centres currently meet the new ratios for children less than two years of age and all are working to address the issue.

The ACT is well positioned to meet the requirements for older age groups. Requirements for children for age 36 months are currently in place in licensed children's services under the *Children and Young People Act 2008*. Publically funded preschools, currently operating at a ratio of 2: 25 are transitioning to the required ratio in-line with NQF timeframes.

#### *Diversity of early childhood development sector*

The Report needs to make clear the major challenge in implementing the Reform Agenda. This is the historic division between sectors, providers and levels of government that characterises the early childhood development sector. Variance across jurisdictions in the delivery, funding, subsidies, staffing and professional development requirements of early childhood development services further challenges implementation efforts. In the ACT preschool education is delivered as part of the school system. Approximately 83% of children access this service (2011 Report on Government Services). Early childhood services (child care) providers in the ACT are making individual service choices in response to requirements under the Reform Agenda.

#### *Diversity of early childhood development (ECD) workforce*

The Report groups different types of workers under the early childhood development workforce. These include those who work in early learning and care centres (child care), family support workers, teachers in government preschools and health professionals. The Report should acknowledge that the early childhood education and care (ECEC) workforce is the main focus of the report and recommendations. Workers in family support and health services and government funded preschool teachers generally have high qualifications and remuneration.

In strongly supporting integrated services delivery, the Report should make clear that the early childhood development workforce comprises a number of distinct workforce

groups. Rather than a generic workforce group, each sector operates under differing awards, funding bodies and management and has differing qualification and training requirements etc. This complexity means no single government controls the levers to address workforce issues in their jurisdiction.

#### *Integrated service delivery*

The ACT Government commitment to optimising children's early development, learning and well-being is strong. Investment in universal service platforms and integrated service delivery models is supported by integrated behaviours across agencies to best meet the diverse needs of young children and their families. As this is a relatively new area of development and a new way of working, qualifications in this area and supports for staff to undertake further study, would be supported.

The Report states as integrated services are further developed, it is anticipated that more children will access child health and family support services from the same service at which they attend ECEC (page XXII). This assumes that ECEC services are government run and provided which is not the case. Providing child health and family support services at child care centres would have significant cost implications for parents and government. It should be noted that comprehensive evidence supporting the establishment of further integrated models is required to build the evidence base.

The ACT Government contends integrated responses and behaviours to meet the needs of young children is a more appropriate reflection of the services delivery system rather than onsite integrated services delivery which is still in its infancy in a number of jurisdictions, including the ACT.

#### *Funding early childhood education and care services*

Given that the funding of early childhood services and programs differs across jurisdictions, the Report could clarify the difference between government funded and provided preschools that do not charge fees (as in the ACT) and early learning and care centres either provided through not-for-profit non-government organisations or the private sector. It should be noted that the latter two charge parents full fees for child care services.

Further to this, it would be helpful if the Report also clarified the funding and assistance provided by the Commonwealth and the States and Territories. The report should note that currently the Commonwealth has primary responsibility for providing fee relief for parents on low to medium incomes (*Child Care Benefit*) and tax benefits for all parents with out of pocket expenses for child care (*Child Care Rebate*).

The ACT Government requests that the Report clarify beyond regulatory requirements, that governments have limited control over early learning and care centres, in contrast to staffing in government funded and delivered preschools. This remains a key issue in

addressing the interrelated issues of improved wages and conditions, and professional standing of the workforce not under the employ of the government.

*Quality VET provision*

The most significant barrier to achieving NQA and NPA ECEC goals is the availability of appropriately qualified and experienced staff. The Report's focus on quality VET provision and suggested measures to ensure quality and consistency of provision across the training sector are supported. The development of ways to reward and remunerate early childhood professionals working in a market based system, that recognises the value and importance of their work, remains the overarching issue for governments to progress. Ensuring that families, especially the most disadvantaged are not excluded from services due to increases in costs associated with improved wages and conditions for early childhood professionals, is a central consideration in the development of workforce strategies.

### Draft Recommendations

#### *Recommendations particularly supported by the ACT*

- The ACT Government agrees with draft recommendation 10.7 regarding the auditing of high and low risk RTOs delivering ECEC qualifications.
- ACT Government agrees with draft recommendation 10.4 and welcomes the idea of DEEWR implementing professional development for VET assessors.
- ACT Government agrees in principle (subject to clarification) with draft recommendation 10.8. The Education and Training Directorate has made nationally recognised qualifications available for workers in ECEC services to access through a variety of funding programs.
- The ACT Government agrees jurisdictions not require child health nurse to have midwifery qualifications (draft recommendation 12.3). In the ACT Maternal Child Health Nurses (MACH Nurses) are required to hold a post graduate qualification in child and family health but are not required to hold a midwifery qualification. Those nurses without a background in midwifery require more guidance from their clinical supervisors. New staff undergo a comprehensive professional development pathway to prepare and support them to function competently and confidently across the full scope of the role.

#### *Recommendations - recommended detail and clarification*

- In regards to draft recommendation 3.1 the ACT Government understands the National Regulations will specify which service information that will be made publically available. Publishing a stand-alone rating does not provide appropriate contextual information for a consumer to make an informed choice regarding a service. Sound evidence must be used. This is a matter that will be dealt with in the National Law and Regulations. The potential overlap between information available on *myChild* and *mySchools* websites is an additional issue for clarification. There are still industrial issues to be resolved with the AEU nationally in regards to the publication of ratings and teacher performance.
- Draft recommendation 3.2 in regard to governments needing to ensure that there is adequate financial support for vulnerable and disadvantaged families. The Report should clarify which government needs to ensure adequate financial support for families. This responsibility currently rests primarily with the Commonwealth Government, with some limited assistance provided by some States. For example, in the ACT funding is provided for emergency, casual and permanent part time child care places for vulnerable and at risk children including children who are currently placed

with, or are known to the Care and Protection system. Emergency places are made available for families in immediate crisis including families experiencing domestic violence, substance abuse and/or are at risk of homelessness. Emergency places may also be provided to children with a disability and children from an Aboriginal or Torres Strait Islander background on a short term basis. States and Territories generally provide only limited assistance with child care fees. Preschool education is free in the ACT.

- Draft recommendation 5.1 regarding the employment of 3-year qualified early childhood teacher to deliver the preschool program. The ACT Government understands that the National Regulations provide for 3 year qualified teachers as a transition measure. In supporting the National Agenda's focus on quality, the ACT Government can support 3 year teacher qualifications as a transitional arrangement however, will continue to work towards four year qualified staff working across the ECEC sector. The Education and Training Directorate require 4 year qualified teachers in ACT Government preschool teaching positions.
- Draft recommendations 8.1 and 8.2 regarding government modifying the scope, operation and funding of inclusion programs including the cost of replacement staff. The Report should clarify Commonwealth, State and Territory responsibilities for inclusion programs in early learning and care centres. The majority of these centres are not funded or controlled by State and Territory governments and meeting the cost of replacement staff is a matter for centre management. The Report should indicate that there is a tension with governments providing significant higher levels of funding for private or not for profit early learning and care centres. These centres continue to charge parents commercial rates for child care.
- In regards to draft recommendation 10.8 the ACT Government would appreciate clarification as to what is specifically intended by 'Government's will ensure...access'.

*Recommendations not agreed/ request are modified*

- Draft recommendation 7.2 regarding occasional care services. The Report should clarify the users of occasional care. The ACT Government contend that a significant number of disadvantaged children are regularly placed in occasional care. While a session may represent limited time, if used regularly there is scope for occasional care workers to influence children's outcomes. This form of care may present the only opportunity to influence these children's learning and development. This is particularly the case for children experiencing disadvantage whose parents receive income support, are unemployed, or on a disability pension. Occasional care workers, on this basis, should not be excluded from mandatory qualification requirements and strategies to up-skill the workforce.

### Clarification of ACT position

- While implementation planning for the NQA is progressing smoothly, relevant agencies maintain a watching brief. The ACT Government contends that additional resources have been required to train regulatory staff under the new arrangements (refer page 25). It is anticipated that further staff will be required.
- The ACT Government asks that page 70 stating the ACT is not compliant with *National Quality Framework* (NQF) ratios for 2-3 year old is amended. The ACT's current requirements for 2-3 year olds already comply with the ratio required under the NQF.
- The ACT disagrees with the statement that there are no increases in cost to regulate under the Reform Agenda (refer page 44). Whilst significant planning is underway the system is yet untested. To date, all indications are that there will be an increased cost to the ACT with regards to regulatory staff. The ACT Government is absorbing implementation costs under the Reform Agenda, including the ongoing regulation of out of scope services.
- The ACT Government questions the statement '*inconclusive evidence on staff: child ratios*' (refer page 4). The ACT Government understands the National Quality Framework is premised on the evidence that higher staff to child ratios and staff qualifications influence quality outcomes for children. The ACT Government has committed to smaller class sizes in preschool and the early years of school. Anecdotal advice from the ACT early childhood sector suggests that services that have already moved to a 1:4 ratio are reporting improved outcomes for children. The ACT Government suggests this statement be re-considered.
- The ACT Government would like to provide comment on the statement on page 43, that new licensing processes will examine the educational program and quality of interactions between ECEC staff and children- *issues that are not currently covered by state/territory regulation*. To date, the licensing and regulation of children's services in the ACT has included specific requirements around programs for children and quality of staff: child interactions. Quality of interaction can be examined for ACT public school preschool units under the Student Engagement domain in the 2009 *School Improvement Framework* (available at: [http://www.det.act.gov.au/data/assets/pdf\\_file/0011/64298/SchoolImprovementFramework.pdf](http://www.det.act.gov.au/data/assets/pdf_file/0011/64298/SchoolImprovementFramework.pdf))

In addition, Children's Services Advisers under the *Children and Young People Act 2008* (and previous legislation) have traditionally held both an advisory and a regulatory role. As a result of this, the ACT is well placed to respond to the new



assessment and rating requirements. This is supported by the sector that generally has indicated ACT Advisers are in a better position to undertake the assessment and rating of services based on an established and trusted relationship.

- In regard to provisions for temporary and permanent services waivers (refer page 39), the ACT Government contends waivers are an important mechanism to maintain service delivery at all times for providers. Quality of service must be balanced with operational requirements. A nationally consistent approach to the granting of waivers has been explored and will be dealt with in the National Regulations. Any publically available information on service waivers needs to protect the personal details of staff working at the service.
- The ACT Government observes current services descriptors for school age care and occasional care services undervalue the important role of these services types for children and their families (refer pp. 105, 110 and 113). Both occasional care and school age care have been licensed and regulated in the ACT for over 20 years. Use of term 'non-cognitive' is not supported and the ACT Government asks the description of these service types be revised. Information on ACT school age care and occasional care services is provided under the *Information Requests* section (see Attachment 5).
- The ACT Government queries the Report's suggestion that an appropriate regulatory system be in place aimed that is aimed at quality improvement (see page 45). The ACT contends the Reform Agenda is premised on an appropriate regulatory system being in place to underpin the range of reforms under the National Quality Framework.
- The ACT Government asks the Report note that actual salary level for early childhood teachers employed in the state school system does not take into account other conditions such as higher levels of superannuation (refer page 73), as is the case in the ACT.

Detailed comments

The following comments address statements made in the draft Report:

- ***The wages of workers in most early childhood education and care employment categories will need to rise because of these factors, and the need to match wage relativities with the primary school sector for teachers (page XX).***

The majority of workers in the early childhood development workforce are not required to have four year university degrees, which are held by teachers. It is expected that teacher salaries would be higher. If primary school teacher wage levels were to be imposed on centre staff, it would have additional significant cost implications for parents and governments and impact on centre viability.

- ***As a result, without further assistance, these parents are more likely to reduce their children's participation in early childhood education and care services in response to any cost increases (page XX).***

Significant assistance is already provided by the Commonwealth Government for fee relief for disadvantaged families accessing childcare services. The Commonwealth also provides tax rebates for out of pocket expenses. A number of State and Territory governments also provide free preschool services and some supplementary assistance for particular groups of students through a range of programs such as those relating to early intervention. Parents base such decisions on what best suits family needs and cost considerations.

- ***Early childhood development services for children with additional needs, and for Indigenous children, are not meeting the standards commonly available to other children. It is essential that early childhood development workforce requirements for children with additional needs and Indigenous children are given priority, so that the gap between these and other children is minimised not exacerbated (page XX)***

Although the report indicates that there is limited data available on child care support workers for children with additional needs, it concludes that current services for these children are not meeting standards commonly available for other children. This conclusion is based on limited evidence.

ACT Government suggests that either further evidence be provided or the finding reflects the actual situation. In the ACT children with additional needs are able to access a comprehensive suite of ECD services and programs for children across the portfolio areas of health, education, therapy, family support. It should be noted that the ACT Government funds five Koori Preschools that provide free preschool education to Indigenous children in Indigenous only preschools.

- ***Table 2 – The role of governments in the ECD sector – indicates that the Commonwealth Government provides most funding for family support (refer page XXIV).***

The services included under the broad heading of family support should be clarified. The ACT Government understands that the bulk of family support programs are funded by State and Territory governments as part of a suite of programs supporting families and children, and care and protection services. The Report should clarify that while many family support programs are delivered by non-government organisations, they are mainly funded by State and Territory governments.

- ***Government funding formulas mean that many ECEC services do not have the ability to increase wages or to pay different rates to different staff without fee increase (some jurisdictions do not charge fees for preschool) (Page XXVIII).***

It should be clarified that funding of childcare centres and funding formulas are a matter for individual centres and are based on revenue received from fees. While governments provide some supplementary funding, this does not determine how an ECEC centre is managed or funded.

The ACT Government provides additional assistance to early learning and care centres managed by the non-government sector through charging peppercorn rent for government owned facilities. This significant subsidy means that around half of the early learning and care centres in the ACT have the capacity to allocate additional resources to workforce development.

- ***Current funding levels typically only allow for the payment of wages at around award levels, and are inadequate to attract workers from other, more highly paid sectors. As a result, funding for family support services needs to be increased (page XXX).***

The ACT provides significant funding for family support and a wide range of programs including Child and Family Centres and Early Childhood Schools. Any increased funding would need to be considered with other government priorities.

- ***The impact of this increase will not be felt evenly – disadvantaged children often come from disadvantaged backgrounds, and many forms of disadvantage place additional pressure on family budgets. In the absence of appropriately targeted additional funding the increase in ECEC costs will see some children have reduced access to, or be withdrawn from ECEC services...(page XXXIV)***

It is understood that disadvantaged families receive greater support through fee relief from Commonwealth tax assistance. State and Territory governments also

provide a range of further targeted assistance for children with special needs, including through early intervention programs.

In the ACT, funding for employees in the social and community sector (generally delivering family support services) are primarily driven by market forces. The majority of these workers are employed by community organisations of which most are funded through the ACT Government and provided with wage price indexation.



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## Attachment 5

### Information Requests:

- The ACT Early Childhood Schools Initiative
- ACT Government Child and Family Centres
- Koori Preschool program
- ACT children's services sector training
- ACT school care and occasional care services

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### The ACT Early Childhood Schools Initiative

The ACT early childhood schools (ECS) initiative is in the early stages of implementation. During 2009 four early childhood schools were created and serve as regional hubs in Belconnen, Woden/Western Creek, Tuggeranong and South Canberra. The early childhood schools have been situated in localities in the ACT that are characterised by greater levels of disadvantage. Integrated services will be delivered from school sites because schools are recognised as "near-universal" and non-stigmatising.

The ECS operate as "early learning and development centres" and provide access to a range of integrated services for children (pre-natally to 8 years) and their families.

As the ECS have developed, a unique menu of services such as child care, preschool to year 2 classes, health care, parent education and family support services, targeted support, and links to services such as housing and employment have been made available at each hub. Although there is flexibility for the ECS to be responsive to local and regional community needs, they continue to contribute to the ACT government's broad policy outcome areas of "providing excellent schooling, strengthening families and building communities". The specific objectives of this initiative are to:

- promote children's early learning and strengthen their progress
- improve transitions for children between home, early childhood settings and schooling
- support children's health and well-being
- meet the needs of their communities
- help build strong families and communities
- involve families and communities in genuine partnerships
- use interagency approaches to link services for children and families
- provide a valuable research base that will help improve early childhood education across the ACT public school system

The model of early childhood schools is built on three platforms: "high quality learning", "integrated service delivery" and "family support and participation" (ACT DET. (2008).

*Early Childhood Schools: A Framework for Their Development as Learning and Development Centres for Children (birth to eight) and Their Families.* Canberra: ACT Government.

## **ACT Government Child and Family Centres**

### **ACT CHILD AND FAMILY CENTRES**

Child and Family Centres were a flagship initiative of the 2004 *Canberra Social Plan*, providing the cornerstone of the ACT Government's early intervention platform. Two Child and Family Centres have been established, the first at Gungahlin (opened in May 2006), and the second at Tuggeranong (opened in June 2007). Based on the success of these Centres, a third Child and Family Centre opened in West Belconnen in May 2011.

The Centres, which are extremely popular with children and parents, are a publicly funded, 'one-stop-shop' with a wide range of universal through to more targeted services. Prevention and early intervention services include parent education sessions as well as programs specifically for more vulnerable families. Primary health care services such as Maternal and Child Health Clinics and midwifery clinics operate from the Centres. Most programs are offered in partnership and are based on or replicate evidence based programs, reflecting the priority on providing effective services.

The provision of early learning programs is a focus of the Centres. Paint and Play is a universal playgroup for children 0-5 and their families offered in suburban parks within the ACT. Targeted playgroups are also offered, including POPPY, for parents with a mental illness; Playing Together for children with special needs; and Learn, Giggle and Grow for parents who have been involved with the Care and Protection system.

The West Belconnen Child and Family Centre, established under the Indigenous Early Childhood Development National Partnership Agreement, provides brokerage funds for families to access approved child care. This strategy is specifically aimed at increasing the participation of Aboriginal and Torres Strait Islander children in child care.

*Parentlink* is the universal parenting education program of the ACT Government providing easily accessible and up-to-date parenting information. Topics include *Right from the Start*, *More than Reading and Writing*, and *Growing and Learning in the family*.

The *ACT Children's Plan 2010-2014* outlines the building blocks to make Canberra Australia's child friendly capital. Building Block four is the regular reporting of the state of children's health, wellbeing, learning and development. The first ever *Picture of ACT's Children and Young People* will be released in late 2011 which is the first step in an outcomes based data and monitoring system in the ACT.

## **Koori Preschool program**

The Koori Preschool Program provides an early childhood education program for Aboriginal and Torres Strait Islander children 3-5 years of age. Younger children are welcome to participate but must be accompanied by a parent or adult caregiver.

The program began in 1993 following consultation with community. The current program provides 9 hours of early childhood education per week across five sites:

1. Narrabundah
2. Richardson
3. Wanniasa
4. Holt and
5. Ngunnawal.

Each site is staffed by a qualified Early Childhood Teacher and for Aboriginal and Torres Strait Islander Home School Liaison Officer.

Aboriginal and Torres Strait Islander children aged 4 on or before 30 April can also attend their local preschool for 12 hours per week. Aboriginal and Torres Strait Islander children aged 3 on or before 30 April can also attend their local preschool for six hours per week in second semester through the Early Childhood Education Early Entry Program. Aboriginal and Torres Strait Islander children with additional needs can also attend an Early Childhood Education Early Intervention Program from 2 years of age.

Koori Preschool Program staff also support Aboriginal and Torres Strait Islander children, their families and teaching staff in local preschools.

## **ACT children's services sector training**

More information about demand for and supply of Children's Services training in nationally recognised VET qualifications under funding programs administered by the Education and Training Directorate (EDT) is available in the following document on the EDT website:

Section 2: Community Services and Health

[http://www.det.act.gov.au/vhe/industry\\_and\\_community\\_consultation/act\\_vocational\\_education\\_and\\_training\\_priorities](http://www.det.act.gov.au/vhe/industry_and_community_consultation/act_vocational_education_and_training_priorities)



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### **School age care and occasional care**

School age care services in the ACT provide quality care and recreational activities for children who are enrolled at and are attending primary school. School age care services are an important part of the ACT early childhood education and care sector and may offer before school care, after school care and vacation care. The Community Services Directorate has been licensing the School Age Care Sector for over two decades and recognises the important contribution that these services deliver to the children of the ACT. School Age Care services are able to provide programs that are focused more upon play, leisure and supporting well being which complements the existing suite of services available within the ACT.

Occasional Care services within the ACT allow for flexible booking arrangements for periods of hour to a full day, depending on individual circumstances and centre capacity. Services can offer a range of options, including casual and part-time bookings and most occasional care services can offer some assistance with fees.

As per previous comments, occasional care services provide an important service that includes care and education activities for young children, and provide respite and support for vulnerable families.



**Minor edits to Appendix E**

In the first paragraph of the appendix, sentence: *The Australian Government contributes most of the funding for early childhood education and care (ECEC) services, State and Territory Governments are responsible for licensing and enforcement, and Local Governments directly provide some services.*

In the case of the ACT, the ACT also provides services as it acts also as a local government in this instance.

**Bottom of Page 1 - Licensing**

The Australian Government does not regulate or licence ECEC services. To be eligible for funding from the Australian Government, however, services must be registered or approved by the Department of Education, Employment and Workplace Relations (DEEWR). This includes long day care (LDC) centres, preschools, family day care (FDC), outside school hours care (OSHC) and occasional care (OC).

Public school preschool units get funding from the Australian Government through Universal Access funding but are not registered or approved by DEEWR.

**Page E8 Box E.2 *Integrated services for children with additional needs***

Only talks about Commonwealth funds, not other integrated services funded by jurisdictions, for example, child and family centres.

**Page E53 is slightly revised inclusive of suggested minor edits**

**Funding and provision**

The ACT Government operates 74 preschool programs. Since 2008, all public preschools have been amalgamated into public schools. Most offer 12 hours of early childhood education to four-year-old children. The implementation of the NPA ECE has begun in 16 ACT public schools with the delivery of 15 hours of preschool education commencing, as required by the NPA ECE (DET ACT ndb).

Since 2009, the Department of Education and Training (DET) has been operating five early childhood schools, offering integrated education and care for children aged birth–8. The schools offer a variety of services, including child care (outsourced to an external provider), preschool, formal schooling through kindergarten and years 1 and 2, community programs for young children and their families, counselling and family support (DET ACT 2008).

Footnotes<sup>13</sup>: Playschools must have a minimum of one staff member for every 10 children attending, and a qualified team leader (holding a Diploma of Children's Services or a degree in early childhood education) for each group of up to 20 children.

Independent preschools need two staff members, one of whom must be qualified, if up to 25 children are attending. Where 26–33 children attend, there must be two qualified staff members — one with a degree and another with a Certificate III in Children’s Services — and an unqualified staff member. Groups in independent preschools may have up to 33 children (DHCS 2009a).

14: In March 2011, the ACT Government decided to restructure its Departments into a single ACT public service agency, comprising nine Directorates. As a result, the Department of Education and Training has changed into the Education and Training Directorate (ETD) (ACT Government 2011). The Department Disability, Housing and Community Services is now the Community Services Directorate (CSD).

The ETD also provides the Koori preschool program, an early childhood education program for Aboriginal and Torres Strait Islander children aged birth–5, through five public schools. Aboriginal and Torres Strait Islander children have access to an additional nine hours of preschool, and can start attending at 3 years of age (DET ACT 2010).

Children with additional needs can access services through the early intervention program managed by ETD ACT. Services range from supported playgroups for toddlers, dedicated preschool sessions, autism and language intervention units and support teachers for children in preschool and school (DET ACT nda).

Within the ECEC sector, the CSD spends around \$2.2 million to fund the provision of occasional care services and support the inclusion of children with additional needs. Services are provided by a number of community organisations (DHCS 2010a).

### **Workforce initiatives**

As part of its preparation for the NQS implementation, the ACT Government has implemented a range of initiatives for ECEC staff to gain or upgrade their qualifications (DHCS 2011). The Government is utilising a range of fully funded strategies to upgrade teacher and preschool assistant qualifications in ACT public schools.