

Submission prepared for: Early childhood education and care . A path to universal early childhood education and care. Draft report (November 2023) Productivity Commission

Prepared by

Karen Kearns (M.Ed (EC) B.Ed.(EC) Grad. Dip. Ed. (Spec. Ed.)
CEO, International Child Care College
RTO Provider No: 90081
146 Lambton Rd
Broadmeadow
NSW 2292



HIGH PERFORMING RTO
The NSW Department of Education has recognised
our organisation as a High Performing Provider

This submission addresses:

Information request 3.1

ECEC-related vocational education and training

The Commission is seeking information on the quality of ECEC-related vocational education and training (VET). In particular, the Commission would welcome views on:

- the impact of recent and ongoing reform both to VET ECEC qualifications and the VET sector more broadly on the quality of qualifications and the job readiness of ECEC graduates
- whether there are widespread problems with the quality of VET ECEC courses, and if so, what these problems are, why they exist and what should be done to address them

Information request 3.2

Effectiveness of traineeship arrangements

The Commission is seeking information on the effectiveness of traineeships as a career pathway in ECEC, or trainees as well as ECEC providers.

Information request 3.3

The Commission would also welcome views on opportunities to improve traineeship arrangements.

Brief Contextual Background

International Child Care College is a high performing RTO specialising in the delivery of early childhood education and care vocational qualifications in NSW.

Qualifications Delivered

- CHCECE30121 Certificate III in Early Childhood Education and Care
- CHCECE50113 Diploma of Early Childhood Education and Care
- BSB50420 Diploma of Leadership and Management (customised for children's education and care)

Student Cohorts

- Traineeship (CHCECE30121 Certificate III in Early Childhood Education and Care)
- School Based Apprenticeships and Traineeships (SBATS)
- NSW State Training Services funded students

Delivery Area

- Newcastle-Hunter/Upper Hunter
- New England
- Western NSW
- Riverina
- Greater Sydney
- Illawarra

Delivery Mode

- Distance education- combining online learning and supported workplace practice

Average Completion Rate

- Traineeships:
- SBATS:
- Funded students:

Trainer and Assessor Expertise

- ICCC Trainers and Assessor are employed on a permanent basis and must hold ECE qualifications

Karen Kearns (CEO)

Karen Kearns is author of award winning textbooks adopted by a majority of both public and private RTO's as required course textbooks across Australia. These textbooks (a series of four) , published by Cengage Australia, are currently in production for a 6th edition:

- The Big Picture - CHCECE30121 Certificate III in Early Childhood Education and Care
- Birth to Big School- CHCECE30121 Certificate III in Early Childhood Education and Care

- Frameworks for Learning - CHCECE50113 Diploma of Early Childhood Education and Care
- The Business of Child Care - CHCECE50113 Diploma of Early Childhood Education and Care and BSB50420 Diploma of Leadership and Management

Karen has also written a fourth edition of Supporting Education for students undertaking CHC30213 Certificate III in Education Support and CHC51308 Diploma of Education Support. Karen textbook is currently the only Australian-based text for these qualifications.

Assessment Materials

Karen and her project team have also written learning and assessment tools for both CHCECE30121 Certificate III in Early Childhood Education and Care and CHCECE50113 Diploma of Early Childhood Education and Care.

These assessments tools have been adopted by both public and private RTO's across Australia in the delivery of the Certificate III and Diploma qualifications.

Karen and her project team have also written learning and assessment tools for BSB50420 Diploma of Leadership and Management (customised to children's services) and delivered by ICCC.

Information request 3.1

ECEC-related vocational education and training

The Commission is seeking information on the quality of ECEC-related vocational education and training (VET). In particular, the Commission would welcome views on:

- the impact of recent and ongoing reform both to VET ECEC qualifications and the VET sector more broadly on the quality of qualifications and the job readiness of ECEC graduates
- whether there are widespread problems with the quality of VET ECEC courses, and if so, what these problems are, why they exist and what should be done to address them

CHCECE30121 Certificate III in Early Childhood Education and Care

I wish to specifically address the recent review of CHCECE30121 Certificate III in Early Childhood Education and Care. I believe this review did little to address ongoing problems of repetition, unnecessarily complex knowledge (for AQF level 3) and excessive performance criteria. I wish to make clear that as an early childhood professional of 40 years I am not advocating a 'watering down' of the qualification. Rather I am advocating a qualification that addresses core knowledge and skills that explicitly reflects the role of a Certificate III educator.

Qualification Description: CHCECE30121 Certificate III in Early Childhood Education and Care

This qualification reflects the role of educators in early childhood education and care who work in regulated children's education and care services in Australia. They support children's wellbeing, and development in the context of an approved learning framework. Educators use a range of well-developed skills and knowledge using discretion and judgment when carrying out their work in the context of established policies and procedures. They may work independently or under the guidance of others, though in some contexts that guidance may not be on-site.

CHCECE30121 Certificate III in Early Childhood Education and Care. Commonwealth of Australia (2021) Skills IQ.(p. 2)

Qualification Description: CHC50113 Diploma of Early Childhood Education and Care

This qualification reflects the role of early childhood educators who are responsible for designing and implementing curriculum in early childhood education and care services. In doing so they work to implement an approved learning framework within the requirements of the Education and Care Services National Regulations and the National Quality Standard. They may have responsibility for supervision of volunteers or other staff.

CHC50113 Diploma of Early Childhood Education and Care (December 2022) Commonwealth of Australia, Skills IQ.(p. 2)

How the role of a Certificate III educator is currently defined is problematic. Traditionally this role/qualification was designed to provide *support* to the lead educator (Diploma level). It traditionally included supporting children play and learning through daily interactions, setting up and packing away learning materials and activities and supporting routine tasks such as meals, toileting, nappy change and settling children for rest. It also typically included housekeeping tasks such as tidying, wiping tables, sweeping floors, keeping children's bathroom clean etc. The ongoing and chronic shortage of Diploma educators has led to Certificate III educators taking on the traditional role of a Diploma educator. This includes taking the lead in planning children's programs and supervising other team members – skills which are not included in a Certificate qualification and were never intended as part of a Certificate III educator role. I believe this shift in the Certificate III educator role is unsustainable and places an unreasonable burden on these educators. It should also be noted that taking on a Diploma role at a Certificate III pay grade is extremely unethical. Certificate III educators do not have the breadth and depth of knowledge needed to plan quality early childhood programs to support children's learning. While the position does allow educators to work independently that does not negate the fact that they lack the training necessary to plan educational programs, particularly for individual children with additional needs. It has been argued that Certificate II educators in these situations have the support of an Educational Leader. This role is typically filled by an EC teacher who make up around 12% of the workforce. (Early Childhood Workforce, Dept. Education, Australian Government (2021).

Knowledge and Skills Requirements

The Certificate III (AQF) includes 17 units (15 core and 2 electives) and includes 160 hours of workplace training. The Diploma (AQF 5) includes 28 units (23 core and 5 electives) and includes 280 hours of workplace training.

The Australian Qualifications Framework Council (2013:11) states:

The AQF levels define the relative complexity and depth of achievement and the autonomy required of graduates to demonstrate that achievement. In the AQF there are 10 levels with level 1 having the lowest complexity and AQF level 10 the highest complexity. The levels are defined by criteria expressed as learning outcomes.

AQF level 3 criteria	
Summary	Graduates at this level will have theoretical and practical knowledge and skills for work and/or further learning
Knowledge	Graduates at this level will have factual, technical, procedural and some theoretical knowledge of a specific area of work and learning
Skills	Graduates at this level will have a range of cognitive, technical and communication skills to select and apply a specialised range of methods, tools, materials and information to: <ul style="list-style-type: none"> ▪ complete routine activities ▪ provide and transmit solutions to predictable and sometimes unpredictable problems
Application of knowledge and skills	Graduates at this level will apply knowledge and skills to demonstrate autonomy and judgement and to take limited responsibility in known and stable contexts within established parameters

Source: Australian Qualifications Framework. Second Edition January 2013. Australian Qualifications Framework Council. (p. 11, 33)

I have worked with the Children’s Services Training Package for many years while writing my textbooks and learning and assessment tools. This experience has provided me with a deep and comprehensive knowledge of each unit of competency as well as a holistic understanding of the Children’s Services Training Package.

It is my professional opinion that CHCECE30121 does not reflect AQF 3 and is unnecessarily demanding in both knowledge and skills assessment requirements. For example, CHCECE035 Support the holistic learning and development of children, has 6 elements, 37 performance criteria, 18 bulleted knowledge requirements and some 34 sub-knowledge bullets. CHCECE031 Support children’s health, safety and wellbeing has 9 elements , 42 performance criteria, 22 bulleted knowledge requirements and 61 sub-knowledge bullets. All elements, performance criteria and knowledge requirements must be assessed.

The sheer volume of assessments is, in my professional opinion, excessive and does not reflect the AQF learning criteria.

I believe that CHCECE30121 Certificate III in Early Childhood Education and Care should be designed to focus on essential knowledge and skills, i.e., ‘must haves’ rather than ‘nice to have’. This would also allow learners more time in the workplace to develop a deeper understanding of core knowledge. It also important to be aware that children’s education and care is a highly regulated workplace which must meet the requirements of the Australian Quality Framework (AQF). Much of the core knowledge for this qualification must be understood in the context of the AQF.

Currently workplace tasks based on required performance criteria for this qualification require approximately 120 hours of workplace time (including preparation and consultation with workplace supervisor). This leaves the learner with only 40 hours in the workplace in which to

work alongside, observe and be mentored by experienced educators. As you will be aware workplace mentoring by qualified and experienced practitioners is a key contributor to quality training outcomes.

The volume of workplace assessments also leaves little time for learners and their workplace supervisors to support the development of critical foundation skills.

I am not advocating a watered down qualification. Instead I am suggesting that the knowledge and skills requirements be revisited to more realistically reflect the job requirements of a Certificate 3 educator.

I would also like to address the concept of 'job ready' and what it means in relation to children's education and care services in the current climate. At ICCC we typically refer to Certificate 3 students as 'beginning educators'. We constantly remind our students that the volume of knowledge and skills required for the provision of quality programs for young children is a life-long learning journey. Once graduated our students have a beginning knowledge of many things. Their skills and expertise will continue to grow and develop as they gain valuable experience working alongside experienced educators and guided by senior staff.

Unfortunately the critical and ongoing shortage of educators often place graduates in positions for which they are not yet ready. I am specifically referring to services who employ Certificate 3 graduates as room leaders, responsible for supervising others, planning and implementing programs for children, liaising with families and ensuring regulatory requirements are met. This situation, I believe, is contributing to educator stress and burnout.

Competency-based training relies on a partnership arrangement with government, RTO's and employers. The role of the employer is to provide on-the-job training, mentoring and support. It is the experience of ICCC that services struggle to meet this requirement because of ongoing chronic staffing shortages and as a result:

- workplace supervisors have little or no time to mentor and support students
- existing educators are experiencing high levels of stress
- workplace supervisors (who may themselves hold a Certificate qualification) have little or no training in a mentoring role
- expectations of what students should know and be able to do are often unrealistic

Recommendations

- a. Reducing the volume of workplace tasks while maintaining the required workplace hours may help to reduce stress levels. Students would have more time to simply work alongside

educators and assisting with daily task. In turn students would have the opportunity to engage in hands-on learning.

b. Traineeship funding to include funding for services to build their skills in mentoring and supporting on-the-job learning.

C. Consider the introduction of a Certificate II in Children's Education and Care as a pathway option- this would allow for progression to Certificate III and Diploma.

Upgrade to CHC50113 Diploma of Early Childhood Education and Care

The recent review of the Children's Services Training Package by the now defunct Skill IQ resulted in the entry requirements for CHC50121 Diploma of Early Childhood Education and Care Qualification being restricted to individuals who hold:

- CHC30121 Certificate III in Early Childhood Education and Care

or

- CHC30113 Certificate III in Early Childhood Education and Care (2015).

This restrictive entry requirements means that existing Certificate III educators who hold an older qualification such as CHC30712 - Certificate III in Children's Services (2013) are required to do their Certificate III before moving on to Diploma units. The rationale for this decision is stated as : ' The entry requirement has been introduced to address significant issues of concern in the sector with unduly short courses and a lack of quality and consistency in qualification outcomes'. (Children's Education and Care (CEC) Companion Volume Implementation Guide

CHC Community Services Training Package Release 5.0 July 2021 9. (p.13)

It is argued that existing Certificate III workers with an older qualification may apply Recognition of Prior Learning (RPL). RPL is a lengthy and burdensome process that is not fee-free. Given the chronic shortage of Diploma educators and given that all educators must undertake professional development on an annual basis I believe this entry requirement to be restrictive and unnecessary.

The Australian Skills Quality Authority (ASQA) Regulatory Strategy 2019-2021 identified CHC50113 Diploma of Early Childhood Education and Care as a qualification of concern: 'concerns about early childhood care and education qualifications, including training and assessment practices, poor work placement management and a lack of confidence in the job readiness of graduates.' (Regulatory Strategy 2019-2021. Australian Skills Quality Authority p.15 To the best of my knowledge ASQA has not recommended excluding older qualifications such as CHC30712 as an entry pathway to the Diploma. I am aware that both public and private providers did in fact offer very short timeframes for the completion of a Certificate. However applying a blanket exclusion of all pre-CHC30113 qualifications to the entry requirement is, in

my opinion, unequitable, and a significant unfair and unreasonable barrier to career pathways for educators.

This decision has further exacerbated the already burdensome lack of Diploma educators.

Recommendation

- a. Remove the entry current level requirement for existing Certificate III educators to enable all qualified Certificate III educators to access to this course.
- b. Provide much needed funding across all jurisdictions to support existing Certificate III workers to upgrade to a Diploma qualification.

Information request 3.2

Effectiveness of traineeship arrangements

The Commission is seeking information on the effectiveness of traineeships as a career pathway in ECEC, or trainees as well as ECEC providers.

ICCC is a leader in the effective delivery of quality traineeships. Of all the training models' traineeships offer the best option for students in terms of learning on-the-job. Traineeships also allow students more opportunity to complete workplace tasks in a timely and unhurried manner.

However, the student experience as a trainee varies significantly and is dependent upon the employer regarding the trainee as an *educator-in-training* who requires regular on-the-job ongoing training and mentoring. The chronic shortage of educators has, in some instances, resulted in traineeship being treated as qualified educators, expected to take on with little or on-the-job ongoing training and mentoring. Where this occurs RTO's have little, if any, recourse other than to report concerns to NSW State Training Services. The outcome for trainees in this situation are usually very poor. They can resign from the service and seek employment as a trainee elsewhere, but in rural and remote locations the options for trainees is limited.

ICCC has been very fortunate to have had limited experiences with poor employers. However, I believe that trainees, particularly those who are more vulnerable should be protected by government from exploitation. It should also be remembered that trainees are the most poorly paid of a poorly paid workforce. Vulnerable trainees may include those who have insecure accommodation, lack of family support, English as a second language, Aboriginal and those living in rural/remote communities where access to support services are limited/non-existent.

Recommendation

Strengthen existing protections for trainees and exclude employers who are chronic offenders from accessing traineeship programs.

School Based Apprenticeships and Traineeships (SBATS)

In NSW SBATS must undertake a minimum of 100 hours of paid employment. The Children's Services Education and Care Regulations (2011) allow SBATS to be included in educator to child ratios and are paid a minimum wage – they are deemed to be educators 'working towards' a qualification (Regulation 126 and Regulation 10).

The current NSW Department of Education SBAT model means that students attend the workplace one day per week. This makes it challenging for the students to build rapport with children and the educator team. It also takes them significantly longer to become familiar with the service policies, procedures and routine.

Before these trainees commence workplace tasks it important for them to be familiar with the service and to have established a working relationship with their workplace supervisor. Many of the workplace task require learners to access service documents (e.g., policies and procedures) and to seek approval of their supervisor prior to implementing workplace tasks. In turn this requires students to plan and organise ahead, something which teenagers are not particularly good at! Students must also ensure their schoolwork is up to date. Many SBATS have part-time jobs, sporting and social commitments. Juggling all of these completing demands can be challenging for many students.

The structure of the course requires students to work at a steady pace and complete both knowledge and workplace tasks in a timely manner. While ICCC takes a flexible approach we are constrained by funding arrangements which require completions of a set numbers of units for payment to be triggered. This tends to leave the RTO taking a financial risk and carrying initial the cost of training.

It is my understanding that other states are more flexible in the roll out of SBAT programs. For example Queensland allocate blocks of time (weeks) in the workplace. The NSW one day per week model does not, in my professional opinion, doesn't allow for a quality workplace experience, nor does it provide the best possible opportunity for success.

Recommendation

NSW Department of Education adopt a more flexible (and realistic) approach to SBAT work placement.

Information request 3.3

The Commission would also welcome views on opportunities to improve traineeship arrangements.

Traineeships can be a very effective pathway to gain an initial qualification. However with the current educator shortage trainees may not be receiving the on-the-job professional supervision and support required to perform at their optimum level.

Workplace 'supervisors', in my experience have limited knowledge and skills as mentors and coaches in the workplace. They also lack the necessary time away from their daily duties as primary contact staff to spend meaningful time with the trainee to their professional development.

Again this is a direct result of the educator shortage but also the reality that workplace supervisors are typically primary contact staff and as such have a legal obligation not to undertake any other duties while working directly with children. This creates a Catch 22 situation as service budgets are often hard pressed to employ additional educators to allow workplace supervisors dedicated time for professional supervision and mentoring of trainees.

Recommendation

Provision of funded training in mentoring, coaching and professional supervision for workplace supervisors.

Incentives for services to provide dedicated time for workplace supervision of trainees