

Submission to the Productivity Commission:

1. ACECQA and the Regulatory Authorities in each state and territories should be merged into a single body. I thought that was the original intention of the change to minimise duplication and red tape between the NCAC and DoCS. Unfortunately, each time I rang ACECQA, I would be asked to ring the Regulatory Authority. I have often enquired as to the purpose of its existence as it keeps on referring back to the Regulatory Authority. I thought the intention was to have consistency throughout Australia and not each state having different rules and regulations. This creates frustrations and time pressures.
2. The funding system is complex and many parents and educators have difficulties understanding the system. Since the commencement of the CCMS, we have had to employ an admin staff member 20 hours per week to manage the system. This has increased the cost to parents. As workforce participation relies on availability of care, a simplified funding arrangements may need to be considered, e.g. tax deduction for parents
3. Increasing burden in administration and complying with NQF. Our teaching Directors have now become non-teaching and are still requiring admin assistance especially around quality assessment and rating visits.

We were asked to have our evacuation plan certified by an agency by the assessment officer to be able to get 'Exceeding' rating. We enquired about it and it was going to cost \$1100 for our plan to be reviewed formally and so we did not pursue the 'Exceeding' rating.

Each year we have the fire brigade visit our centre as part of our program and we talked about our evacuation plan with the children and the firemen as well as practice evacuation drills during the year.

When our other centre was assessed, the assessment officer did not require us to have our evacuation plan formally certified. This is just an example. We have heard of many other inconsistencies between assessment officers and these make educators at the 'coal face' lose faith in the whole assessment system.

We need assessment officers who are early childhood qualified and in practice who can consistently and accurately rate and assess services and encourage continuous improvement rather than punitive. Unfortunately, the set up of the regulations is punitive.

Maybe we could look at peer assessment and mentoring rather than assessment by fulltime assessment officers who are removed from the everyday activities of services
4. The curriculum frameworks that educators are working with look at children holistically as competent and build on their strengths to encourage them to meet certain expectations and these expectations can be pretty high. However, the assessment and rating system looks at the worst possible quality area rating as the overall service rating. This demoralises and devalues the works of educators currently working with children at services. They feel that they have failed, where as the 'breach' may be that they have not formalised all their educators professional development goals and hence the service scored 'working towards' for that quality

area. (true story) Common sense needs to prevail otherwise we will lose a lot of good, dedicated, experienced and competent people from the early childhood profession.

5. Unfortunately, the introduction of the NQF has increased the administrative burden for educators working with children. At our services we have had to employ three extra educators to cover for educators while they document children's learning. This has resulted in increased fees to parents. Has this been translated to increased quality? Not at present as trying various ways of efficient documentation, identifying what is significant to document, purpose of documentation, etc.

In the long run, it may improve quality as educators are able to reflect more on what they are doing, to be more selective on their documentation, to question and challenge their beliefs, to be more inclusive of families, their values and beliefs, to understand how children learn and the individual child's strength, motivation etc.

It would be good if there is a mentoring system for documentation of children's learning like the 'Munch & Move' program. It is such a pity that such a great idea as the NQF was implemented so poorly that lots of people become cynical, demoralised, burnt out and exiting the early childhood profession.