**RECOMMENDATION**

Remove the ‘working towards’ rating.

**BACKGROUND/ISSUE**

When the term ‘working towards’ is used it has a very negative connotation and our intelligent, caring and committed educators are made to feel inadequate despite their hard work.

**COMMENTS**

* Immediately remove the words 'Working Towards' from the document.
* The rating does not accurately describe the overall quality of the service. For example if a centre was marked ‘Working Towards’ in only 1 of the 58 NQS Elements, and the other 57 were ‘Meeting’ the NQS, their result should be `Meeting’ particularly if the working towards was not in a health and safety element.
* Families don’t understand the rating system. Families utilising the service do not understand that this is not a negative result, as they do not understand that the goal posts have changed suddenly and many services who achieved High Quality in their last accreditation process, have now been rated `working towards’. `Working Towards’ sounds like a fail.
* Educators have commented that the term working towards makes them feel inadequate.

**RECOMMENDATION**

Change how the overall service rating is decided.

**BACKGROUND/ISSUE**

The rating may not accurately reflect the quality of the service.

**COMMENTS**

* The rating does not accurately describe the overall quality of the service. For example if a centre was marked ‘Working Towards’ in only 1 of the 58 NQS Elements, and the other 57 were ‘Meeting’ the NQS, their result should be `Meeting’ particularly if the working towards was not in a health and safety element.
* The NCAC Accreditation presentation of the results was a better reflection of a service quality. For instance if one element wasn’t met in an area, the rest of the area might have been still high quality, but the graph would show the result as being in the high quality rating, but not the graphed to the top of the section. This shows that one or two things might need improving. Whereas the new Assessment and Rating process just gives the lowest mark that might have been only one element not met, for the whole area, even if the rest of the work the service is doing in that area is excellent.
* A service who is rated as Exceeding in all 7 areas of the NQS should automatically be rated as Excellent.
* If the Excellent rating is supposed to relate to being leaders in our sector, this should be reflected as families do not understand this working. Excellent should mean you are exceeding in all aspects of quality and curriculum, but the current Excellent could actually be re-titled something along the lines of `Leaders in the Sector’, to more accurately reflect the intended/actual meaning of the rating.
* We are aware of some centres achieved a result of Working Towards, due to not being as forward thinking on the topic of sustainability as they could have been. How is this one point fully reflective of the quality of their service? It is not a point that many families are concerned about so it is disappointing when a result of Working Towards is given for something that doesn’t affect outcomes for children, and when the issue is not health or safety related.

**RECOMMENDATION**

Remove the fee for application for Excellent rating.

**BACKGROUND/ISSUE**

This is profiteering and if a service has achieved a high enough rating to apply for Excellent it is wrong that they should have to pay to apply.

**COMMENTS**

* Having a fee associated with this process seems like it is to reduce the number of centres willing to apply for the rating, and therefore cut down the workload for Assessors and ACECQA
* Already services are struggling to manage increased staffing costs due to the NQF, so to add a fee to be acknowledged for the great work a service is doing is not right.

 **RECOMMENDATION**

Re-introduce assessment by peers or private assessment officers who are extensively trained, Early Childhood degree qualified and ISO 9001 audit qualified rather than former licensing officers.

**BACKGROUND/ISSUE**

Former licensing officers just can’t take their compliance hat off and become assessment officers.

**COMMENTS**

* There is no consistency from assessor to assessor.
* Many don’t have appropriate qualifications and/or are outdated in their experience working at a centre level.
* No amount of the latest training, research and thinking is the same as working experience in a service.
* Personal beliefs should not affect ratings. As an example - we are aware of services who did not achieve a result beyond Working Towards, because they didn’t do progressive morning & afternoon teas. To me this is a personal belief that one way is better for all children without considering whether it works for every centre or every age grouping. My personal belief is that for many children the meal time is a time to eat and talk together, not just to free range and eat when and where they like. For some families meal times at preschool are the only meals they sit down together with others around a table. I don’t understand how someone can dictate that a service `has to’ do it a certain way. It should be reflective of our own philosophy and beliefs, as we are discussing and sharing these with the families utilising our service, and those families have the right to put their children into the service that suits their needs and those of their family.

**RECOMMENDATION**

Reduce the administrative burden.

**BACKGROUND/ISSUE**

Already services are stressed by the high amount of paperwork to meet the regulations, but the NQF has seen an increase in the burden.

**COMMENTS**

* As a couple of examples our medication form has gone from one page to two pages, and our allergy forms have gone from 1 page to 5 pages, and need risk minimisation plan for each individual child with allergies or asthma. This is an enormous paperwork burden day to day for educators and families alike.
* New legislation about immunisation only increases administrative burden on centres, and does not do anything to encourage immunisation being up to date, or convert the objectors. The encouragement to keep immunisation up to date and on time, is the cutting of the CCB when it is behind schedule.
* We have two office staff full time in order to keep up to date with the administration of our service, and this is much higher administration hours than in previous years when it was one person full time and a second person 1.5 days.