



## Centre Support

Dr Wendy Craik AM  
Commissioner  
Childcare and Early Childhood Learning  
Productivity Commission  
GPO Box 1428, CANBERRA ACT 2601

February 3, 2014

Dear Dr Craik,

Centre Support is pleased to lodge the enclosed submission to the Productivity Commission's 2014 inquiry into Childcare and Early Childhood Learning.

Our submission is comprised of two sections:

1. Issues and Recommendations
2. Appendix of Industry Feedback Received by Centre Support

The issues raised and recommendations made by Centre Support focus on the Productivity Commission's fifth term of reference for the inquiry into Childcare and Early Childhood Learning:

*"The benefits and other impacts of regulatory changes in child care over the past decade, including the implementation of the National Quality Framework (NQF) in States and Territories, with specific consideration given to compliance costs, taking into account the Government's planned work with States and Territories to streamline the NQF."*

The issues and recommendations we have raised focus on structural issues with the National Quality Framework and how these may be remedied, consistency issues stemming from the Australian Children's Education and Care Quality Authority's lack of leadership, interpretation issues when authorised officers conduct assessment and rating visits as though they are compliance visits, and lastly, the impact of poorly assessed and confusing rating levels on the ability of families to make an informed decision about quality early childhood education and care options.

Below is a summary of the issues and recommendations outlined in our submission.


1	The structure and components of the National Quality Framework make it difficult for educators to implement effectively.	Reduce the number of National Quality Standard Quality Areas.
2	ACECQA is not powerful, responsive or accountable enough to ensure the NQF is consistently implemented.	Increase the power, responsiveness and accountability of ACECQA.
3	Many authorised officers are conducting outcome-based	Return the role of state/territory-based regulatory authorities to one of



	assessment and rating processes from a compliance perspective leading to inconsistent ratings and increased compliance costs.	compliance and contract independent non-government organisations to conduct assessment and rating functions.
4	The current rating system and levels do not provide families with an accurate overview of quality.	Remove the overall service rating and rely on individual Quality Area ratings. Replace the 'Working Towards' rating level with a more positive term such as 'within range' or a code such as P1, P2 or P3.

We welcome the opportunity to add to the vigorous and lively debate on the effectiveness of the National Quality Framework. We have been encouraged by the response shown by our customer network of 3,500 early childhood services around Australia in response to our call for ideas and recommendations.

Kind regards,



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## About Centre Support

Centre Support has two key focuses to support a broad range of early childhood education and care services. Firstly, we provide the ongoing support platform, products and services that allow educators, parents and the community to establish a meaningful connection with the National Quality Framework and exchange information amongst each other efficiently to promote best practice. Secondly, we act as the catalyst that brings the early childhood community together to work collaboratively to shape best practice, define standards and consider solutions to issues of mutual interest.

We have more than 3,500 early childhood services as customers. Our customer network extends to every corner of Australia. We work with long day care services, preschools, kindergartens, outside school hours care services and family day care schemes and educators. More than 40,400 educators have completed training and professional development with Centre Support.



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# Key

<b>ACECQA</b>	Australian Children's Education and Care Quality Authority
<b>ACO</b>	Assessment and Compliance Officer (refer to Authorised Officer)
<b>AQTF</b>	Australian Quality Training Framework
<b>ASQA</b>	Australian Skills Quality Authority
<b>Authorised officer</b>	In some jurisdictions, authorised officers (the title used in the National Regulations) are known as 'assessment and compliance' officers. The responsibilities of authorised officers are uniform in each jurisdiction, despite differences in titles.
<b>EYLF</b>	Early Years Learning Framework
<b>ISO</b>	International Standards Organization
<b>MTOP</b>	My Time Our Place
<b>National Law</b>	Education and Care Services National Law
<b>National Regulations</b>	Education and Care Services National Regulations
<b>NCAC</b>	National Childcare Accreditation Council
<b>NQF</b>	National Quality Framework
<b>NQS</b>	National Quality Standard
<b>QA</b>	Quality Area of the NQS



# Section One

## ISSUES AND RECOMMENDATIONS

**Issue 1:** The structure and components of the National Quality Framework make it difficult for educators to implement effectively.

“Do services really need a 15,000 word report to tell them what they already know? There has to be a more efficient way to use taxpayers’ money.”  
Industry feedback (name withheld) – 31/10/2013

### Information overload

Services are having difficulty complying with a National Quality Framework (NQF) that comprises four different components:

1. The Education and Care Services National Law (the Law)
2. The Education and Care Services National Regulations (the Regulations)
3. The National Quality Standard (the NQS)
4. The Educational Framework which is usually the Early Years Learning Framework or the My Time Our Place Framework (The EYLF or MTOP)

In addition to the substantive documents there are several guidance publications which contain more information, often in simple language, and examples including:

5. The Guide to the National Law and Regulations (the Guide to the Regs)
6. The Guide to the National Quality Standard (the Guide to the NQS)

This multi-document approach has led to areas of difficulty for services.

Requirements for specific topics are often mentioned in the Law, the Regs, the NQS and the EYLF/MTOP. While they often have the same intent the requirements are expressed in different ways leading to confusion, frustration, increased and unnecessary time spent on paperwork and research.

The EYLF/MTOP is a beautiful document and has been described, in a positive way, as a ‘mongrel’ due to the various components it is comprised of including theoretical perspectives and approaches to early childhood education. The EYLF writing team fought hard to ensure the different perspectives (EYLF p 11) were retained in the final version of EYLF. This enables educators to draw on many learning perspectives.

In contrast to the freedom provided to educators by EYLF/MTOP, QA1 narrows the focus on a linear process of curriculum development and extension which is made worse by the limited knowledge and current experience of authorised officers in their role as assessment and rating officers.

“The need to have everything visible on the day is outrageous. In one of my centres it was raining hard and I was marked down as there was no outdoor play occurring despite photographic evidence from the day before.”  
Industry feedback (name withheld) – 16/11/2013

### Duplication

Detailing requirements across the Law, the Regulations, the NQS and the EYLF/MTOP causes unnecessary burdens on services to prove how they meet the standards and regulations.

We believe that the duplication occurred due to the lack of knowledge of underlying ISO 9001 principles and a lack of collaboration between the authors of the key NQF instruments (Regulations, Law, NQS, EYLF/MTOP).



If we look within the broader education industry for a successful model, the Australian Quality Training Framework (AQTF) once had 12 standards. Currently, the AQTF has 3 standards. Below is how the AQTF was simplified:

2001	2007
The first versions of the AQTF had set twelve standards. They formed the 'ground rules' and details of the quality systems that must be established before any organisation could operate as a registered training organisation.	On 1 July 2007 the AQTF 2007 changes came into effect to reduce the regulatory burdens and to streamline and standardise audit processes for national consistency. The original twelve standards have become three standards and nine conditions of registration. The focus of audits are shifting towards an outcomes based model, away from the traditional evidence and processes based model.

*Source: ASQA, 2014.*

A similar model could be applied to early childhood education in Australia to simplify the overcomplicated NQS, the core document for services implementing the NQF. There are three key areas where duplication occurs:

1. curriculum and programming,
2. health and safety, and
3. staffing arrangements.

As an example of the duplication we have detailed how some NQS elements replicate the extensive information and guidance contained in the EYLF/MTOP and regulations. This is not intended to be an exhaustive summary of the areas of duplication. We are happy to provide more information and assistance if required.

## Curriculum and programming

EYLF	NQS & GUIDE TO THE NQS
<p><b>Critical Reflection</b></p> <p><b>Learning Outcome 4.1</b> Children develop dispositions for learning such as curiosity, cooperation, confidence, creativity, commitment, enthusiasm, persistence, imagination and reflexivity</p> <p>Educators promote this when they reflect with children on what and how they have learned</p> <p><b>Learning Outcome 4.2</b> Children develop a range of skills and processes such as problem solving, inquiry, experimentation, hypothesising, researching and investigating</p> <p>Educators promote this when they join in children's play and model reasoning, predicting and reflecting processes and language</p> <p><b>Principle Ongoing learning and reflective practice</b> Overarching questions to guide reflection include:</p> <ul style="list-style-type: none"> <li>• What are my understandings of each child?</li> </ul>	<p><b>NQS</b> 1.2.3 Critical reflection on children's learning and development, both as individuals and in groups, is regularly used to implement the program.</p> <p><b>Guide to NQS</b> Assessors may observe educators:</p> <ul style="list-style-type: none"> <li>• working with children to document and reflect on their experiences and learning</li> <li>• using a variety of methods, such as diary jottings, children's comments and conversations, photographs and examples of children's work, to assist their reflection on children's experiences, thinking and learning.</li> </ul> <p>Assessors may sight documentation:</p> <ul style="list-style-type: none"> <li>• that shows evidence of critical reflection that clearly identifies:</li> <li>• children's learning and their developing ideas and skills</li> </ul>





- What theories, philosophies and understandings shape and assist my work?

- Who is advantaged when I work in this way? Who is disadvantaged?

- What questions do I have about my work? What am I challenged by? What am I curious about? What am I confronted by?

- What aspects of my work are not helped by the theories and guidance that I usually draw on to make sense of what I do?

- Are there other theories or knowledge that could help me to understand better what I have observed or experienced? What are they? How might those theories and that knowledge affect my practice? EYLF P13

When educators reflect on their role in children's learning and assessment they reflect on their own views and understandings of early childhood theory, research and practice to focus on:

- the experiences and environments they provide and how that links to the intended learning outcomes

- the extent to which they know and value the culturally specific knowledge about children and learning that is embedded within the community in which they are working

- each child's learning in the context of their families, drawing family perspectives, understandings, experiences and expectations

- the learning opportunities which build on what children already know and what they bring to the early childhood setting

- evidence that the learning experiences offered are inclusive of all children and culturally appropriate

- not making assumptions about children's learning or setting lower expectations for some children because of unacknowledged biases

- incorporating pedagogical practices that reflect knowledge of diverse perspectives and contribute to children's wellbeing and successful learning

- whether there are sufficiently challenging experiences for all children

- the evidence that demonstrates children are

- examples of children's spontaneous play

- the effectiveness of teaching strategies

- changes that may be needed in the environment

- such as photographs, samples of children's work and their words being used, to create records that are meaningful for children and can be shared with their families.



<p>learning</p> <ul style="list-style-type: none"> <li>• how they can expand the range of ways they assess to make assessment richer and more useful. EYLF P18</li> </ul> <p><b>Intentional Teaching</b></p> <p><b>Learning Outcome 3.1</b></p> <p>Children become strong in their social and emotional wellbeing</p> <p>Educators promote this when they build upon and extend children's ideas</p> <p><b>Learning Outcome 4.1</b></p> <p>Children develop dispositions for learning such as curiosity, cooperation, confidence, creativity, commitment, enthusiasm, persistence, imagination and reflexivity</p> <p>Educators promote this when they provide opportunities for children to revisit their ideas and extend their thinking</p> <p><b>Learning Outcome 4.2</b></p> <p>Children develop a range of skills and processes such as problem solving, inquiry, experimentation, hypothesising, researching and investigating</p> <p>Educators promote this when they intentionally scaffold children's understandings</p> <p><b>Learning Outcome 4.3</b></p> <p>Children transfer and adapt what they have learned from one context to another</p> <p>Educators promote this when they support children to construct multiple solutions to problems and use different ways of thinking</p> <p><b>Responsiveness to children</b></p> <p><b>Learning Outcome 1.3</b></p> <p>Children develop knowledgeable and confident self identities</p> <p>Educators promote this when they demonstrate deep understanding of each child, their family and community contexts in planning for children's learning</p> <p>Educators support this by actively supporting the maintenance of home language and culture</p>	<p><b>NQS</b></p> <p>1.2.2 Educators respond to children's ideas and play and use intentional teaching to scaffold and extend each child's learning.</p> <p><b>Guide to NQS</b></p> <p>Assessors may observe educators:</p> <ul style="list-style-type: none"> <li>• intentionally scaffolding children's understanding and learning</li> <li>• making use of spontaneous 'teachable moments' to extend children's learning</li> <li>• valuing signs of children applying their learning in new ways and talking about this with them in ways that build their understanding</li> <li>• modelling mathematical and scientific language and concepts</li> <li>• modelling language associated with the arts</li> <li>• joining in children's play and co-constructing materials, such as signs that extend the play and enhance literacy learning</li> </ul> <p><b>NQS</b></p> <p>1.1.2 Each child's current knowledge, ideas, culture, abilities and interests are the foundation of the program</p> <p><b>Guide to NQS</b></p> <p>Assessors may sight:</p> <ul style="list-style-type: none"> <li>• evidence that information about the children's family, culture and community is collected and used to inform the program</li> <li>• examples of how educators plan programs that</li> </ul>
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**Learning Outcome 2.1**

Children develop a sense of belonging to groups and communities and an understanding of the reciprocal rights and responsibilities necessary for active community participation

Educators support this when they provide opportunities for children to investigate ideas, complex concepts and ethical issues that are relevant to their lives and their local communities.

**Learning Outcome 2.2**

Children respond to diversity with respect

Educators support this when they engage in interactions with children that promote respect for diversity and value distinctiveness.

**Learning Outcome 4.1**

Children develop dispositions for learning such as curiosity, cooperation, confidence, creativity, commitment, enthusiasm, persistence, imagination and reflexivity

Educators promote this when they listen carefully to children's ideas and discuss with them how these ideas might be developed

**Learning Outcome 4.2**

Children develop a range of skills and processes such as problem solving, inquiry, experimentation, hypothesising, researching and investigating

Educators promote this when they recognise mathematical understandings that children bring to learning and build on these in ways that are relevant to each child

**Learning Outcome 5.1**

Children interact verbally and non-verbally with others for a range of purposes

Educators promote this when they are attuned and respond sensitively and appropriately to children's efforts to communicate

**Learning Outcome 5.2**

Children engage with a range of texts and gain meaning from these texts

Educators promote this when they engage in sustained communication with children about ideas and experiences, and extend their

are responsive to children's knowledge, ideas, culture, abilities and interests and how they promote children's wellbeing and learning outcomes.





vocabulary

### Learning Outcome 5.3

Children express ideas and make meaning using a range of media

Educators promote this when they join in children's play and co-construct materials such as signs that extend the play and enhance literacy learning

### EYLF Practice Responsiveness to children

Educators are responsive to all children's strengths, abilities and interests. They value and build on children's strengths, skills and knowledge to ensure their motivation and engagement in learning. They respond to children's expertise, cultural traditions and ways of knowing, the multiple languages spoken by some children.. p14

### Assessment

#### Learning Outcome 3.1

Children become strong in their social and emotional wellbeing

Educators promote this when they collaborate with children to document their achievements and share their successes with their families.

### EYLF Practice Assessment for learning

Assessment for children's learning refers to the process of gathering and analysing information as evidence about what children know, can do and understand. It is part of an ongoing cycle that includes planning, documenting and evaluating children's learning.

Educators use a variety of strategies to collect, document, organise, synthesise and interpret the information that they gather to assess children's learning. They search for appropriate ways to collect rich and meaningful information that depicts children's learning in context, describes their progress and identifies their strengths, skills and understandings. More recent approaches to assessment also examine the learning strategies that children use and reflect ways in which learning is co-constructed through interactions between the educator and each child. Used effectively, these approaches to assessment become powerful ways to make the process of learning visible to children and their families, educators and other professionals.

### NQS

- 1.1.1 Curriculum decision making contributes to each child's learning and development outcomes in relation to their identity, connection with community, wellbeing, confidence as learners and effectiveness as communicators.

### Guide to NQS

Assessors may observe:

- children expressing a wide range of emotions, thoughts and views constructively
- children exploring aspects of identity through role play
- children expressing opinions in matters that affect them
- children being empowered to make choices and solve problems to meet their needs
- children working collaboratively with others
- children moving around and through their environments confidently and safely
- children being curious and enthusiastic participants in their learning
- children using play to investigate, imagine and explore ideas
- educators providing experiences that actively promote or initiate the investigation of ideas, complex concepts and thinking, reasoning and hypothesising
- children conveying and constructing messages with purpose and confidence
- educators consolidating and extending children's communication



The five Learning Outcomes in this Framework... provide early childhood educators with key reference points against which children's progress can be identified, documented and communicated to families, other early childhood professionals and educators in schools. Over time educators can reflect on how children have developed how they have engaged with increasingly complex ideas and participated in increasingly sophisticated learning experiences.

Ongoing assessment processes that include a diverse array of methods capture and validate the different pathways that children take toward achieving these outcomes. Such processes do not focus exclusively on the endpoints of children's learning; they give equal consideration to the 'distance-travelled' by individual children and recognise and celebrate not only the giant leaps that children take in.

## Culture and Diversity

### Learning Outcome 1.2

Children develop their emerging autonomy, inter-dependence, resilience and sense of agency

Educators promote this when they build on the culturally valued learning of individual children's communities

### Learning Outcome 1.3

Children develop knowledgeable and confident self identities

Educators promote this when they show respect for diversity, acknowledging the varying approaches of children, families, communities and cultures

### Learning Outcome 4.1

Children develop dispositions for learning such

1.2.1 Each child's learning and development is assessed as part of an ongoing cycle of planning, documenting and evaluation

## Guide to NQS

Assessors may sight:

- evidence that information gathered in children's documentation demonstrates the children's learning and development in the service
- evidence of the cycle of planning, documenting and evaluating
- evidence that children's ideas, interests and points of view are heard and respected in planning for and assessing learning experiences
- examples of children's representation of their learning and work that is documented and displayed in sensitive and respectful ways
- information about planned experiences that is recorded in a way that children and families can appreciate and understand and that is displayed for them to view
- opportunities for families and children to comment on or provide feedback about the program
- evidence that written programming and evaluation is ongoing, appropriate and inclusive of each child.

## NQS

1.1.2 Each child's current knowledge, ideas, culture, abilities and interests are the foundation of the program.

## Guide to the NQS

Assessors may observe:

- educators demonstrating flexibility in program delivery to incorporate children's ideas, cultures and interests to ensure that experiences are relevant and engaging.

children developing strong foundations in the culture and language of their family and in that of the broader community.



as curiosity, cooperation, confidence, creativity, commitment, enthusiasm, persistence, imagination and reflexivity

Educators promote this when they explore the diversity of cultures and social identities

### EYLF Practice Cultural Competence

Educators who are culturally competent respect multiple cultural ways of knowing, seeing and living, celebrate the benefits of diversity and have an ability to understand and honour differences. This is evident in everyday practice when educators demonstrate an ongoing commitment to developing their own cultural competence in a two way process with families and communities.

Educators view culture and the context of family as central to children's sense of being and belonging, and to success in lifelong learning. Educators also seek to promote children's cultural competence. Cultural competence is much more than awareness of cultural differences. It is the ability to understand, communicate with, and effectively interact with people across cultures. Cultural competence encompasses:

- being aware of one's own world view
- developing positive attitudes towards cultural differences
- gaining knowledge of different cultural practices and world views
- developing skills for communication and interaction across cultures. P16

**Recommendation:** At the minimum, NQS QA1 must be removed and curriculum programming requirements brought under the EYLF/MTOP. The next step would be to also remove QA5 (Relationships with children) and QA6 (Partnerships with families) as these are also intrinsically included in the EYLF/MTOP.

[Australian] teachers get confused between the Regulations, Law, National Quality Framework, National Quality Standards, and the Early Years Learning Framework with it principles and all of its numbered elements and the list goes on... [In] New Zealand teachers incorporate this curriculum in to everything they do. There is the one resource that is the guide.  
Industry feedback (name withheld) – 5/12/2013



## Health and safety

The red text indicates specific sections of QA2 and QA3 that relate to the Regs.

NQS	REGS
QA2 (Children's health and safety)	PART 4.2—CHILDREN'S HEALTH AND SAFETY
2.1.1 Each <b>child's health needs</b> are supported.	77 Health, hygiene and safe food practices
2.1.2 Each child's comfort is provided for and there are appropriate opportunities to meet each child's need for <b>sleep, rest and relaxation</b> .	78 Food and beverages
2.1.3 Effective <b>hygiene practices</b> are promoted and implemented.	79 Service providing food and beverages
2.1.4 Steps are taken to control the spread of <b>infectious diseases</b> and to manage injuries and <b>illness</b> , in accordance with recognised guidelines.	80 Weekly menu
2.2.1 <b>Healthy eating</b> is promoted and food and drinks provided by the service are nutritious and appropriate for each child.	81 Sleep and rest
2.2.2 <b>Physical activity</b> is promoted through planned and spontaneous experiences and is appropriate for each child.	82 Tobacco, drug and alcohol-free environment
2.3.1 <b>Children are adequately supervised</b> at all times.	83 Staff members and family day care educators not to be affected by alcohol or drugs
2.3.2 Every reasonable precaution is taken to <b>protect children from harm and any hazard</b> likely to cause injury.	84 Awareness of child protection law
2.3.3 Plans to effectively <b>manage incidents and emergencies</b> are developed in consultation with relevant authorities, practised and implemented.	85 Incident, injury, trauma and illness policies and procedures
2.3.4 Educators, co-ordinators and staff members are aware of their roles and responsibilities to respond to every <b>child at risk of abuse or neglect</b> .	86 Notification to parents of incident, injury, trauma and illness
	87 Incident, injury, trauma and illness record
	88 Infectious diseases
	89 First aid kits
	90 Medical conditions policy
	91 Medical conditions policy to be provided to parents
	92 Medication record
	93 Administration of medication
	94 Exception to authorisation requirement— anaphylaxis or asthma emergency
	95 Procedure for administration of medication
	96 Self-administration of medication
	97 Emergency and evacuation procedures
	98 Telephone or other communication equipment
	99 Children leaving the education and care



<p><b>QA3 (Physical environment)</b></p> <p>3.1.1 Outdoor and indoor spaces, buildings, furniture, equipment, facilities and resources are suitable for their purpose.</p> <p>3.1.2 Premises, furniture and equipment are safe, clean and well maintained.</p> <p>3.1.3 Facilities are designed or adapted to ensure access and participation by every child in the service and to allow flexible use, and interaction between indoor and outdoor space.</p> <p>3.2.1 Outdoor and indoor spaces are designed and organised to engage every child in quality experiences in both built and natural environments.</p> <p>3.2.2 Resources, materials and equipment are sufficient in number, organised in ways that ensure appropriate and effective implementation of the program and allow for multiple uses.</p>	<p>service premises</p> <p>100 Risk assessment must be conducted before excursion</p> <p>101 Conduct of risk assessment for excursion</p> <p>102 Authorisation for excursions</p> <p><b>PART 4.3—PHYSICAL ENVIRONMENT</b></p> <p>103 Premises, furniture and equipment to be safe, clean and in good repair</p> <p>104 Fencing</p> <p>105 Furniture, materials and equipment</p> <p>106 Laundry and hygiene facilities</p> <p>107 Space requirements—indoor space</p> <p>108 Space requirements—outdoor space</p> <p>109 Toilet and hygiene facilities</p> <p>110 Ventilation and natural light</p> <p>112 Nappy change facilities</p> <p>113 Outdoor space—natural environment</p> <p>114 Outdoor space—shade</p> <p>115 Premises designed to facilitate supervision</p> <p>116 Assessments of family day care residences and approved family day care venues</p> <p>117 Glass</p>
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**Recommendation:** The regulations covering children’s health and safety and the physical environment are extensive and are sufficient to achieve the intent of NQS QA2 and NQS QA3 (3.1 and 3.2). We recommend removing QA2 and 3.1 and 3.2. Much of the NQS could be used in the Guide to the Regs as examples of how services may meet the National Regulations.

## Staffing arrangements

NQS	REGS
<p><b>QA4 (Staffing arrangements)</b></p> <p>4.1.1 Educator-to-child ratios and qualification requirements are maintained at all times.</p>	<p><b>PART 4.4—STAFFING ARRANGEMENTS</b></p> <p>118 Educational leader</p> <p>119 Family day care educator and family day</p>





<p>4.2 Educators, co-ordinators and staff members are <b>respectful and ethical</b>.</p> <p>4.2.1 <b>Professional standards</b> guide practice, interactions and relationships.</p> <p>4.2.2 <b>Educators</b>, co-ordinators and staff members <b>work collaboratively</b> and affirm, challenge, support and learn from each other to further develop their skills, to improve practice and relationships.</p> <p>4.2.3 <b>Interactions convey mutual respect</b>, equity and recognition of each other's strengths and skills.</p> <p>QA7 (Leadership and service management)</p> <p>7.1.1 Appropriate <b>governance arrangements</b> are in place to manage the service.</p> <p>7.1.2 The <b>induction of educators</b>, co-ordinators and staff members is comprehensive.</p> <p>7.1.3 Every effort is made to promote <b>continuity of educators</b> and co-ordinators at the service.</p> <p>7.1.4 Provision is made to ensure a suitably qualified and experienced <b>educator</b> or co-ordinator <b>leads the development of the curriculum</b> and ensures the establishment of clear goals and expectations for teaching and learning.</p> <p>7.1.5 <b>Adults</b> working with children and those engaged in management of the service or residing on the premises are <b>fit and proper</b>.</p> <p>7.2.1 A <b>statement of philosophy</b> is developed and guides all aspects of the service's operations.</p> <p>7.2.2 The <b>performance of educators</b>, co-ordinators and staff members is evaluated and individual development plans are in place to support performance improvement.</p> <p>7.2.3 An effective self-assessment and <b>quality improvement process</b> is in place.</p> <p>7.3.1 <b>Records and information are stored appropriately</b> to ensure confidentiality, are available from the service and are maintained in accordance with legislative requirements.</p> <p>7.3.2 <b>Administrative systems</b> are established and maintained to ensure the effective operation of the service.</p> <p>7.3.3 The <b>Regulatory Authority is notified</b> of any relevant changes to the operation of the service,</p>	<p>care educator assistant to be at least 18 years old</p> <p>120 Educators who are under 18 to be supervised</p> <p>121 Application of Division 3</p> <p>122 Educators must be working directly with children to be included in ratios</p> <p>123 Educator to child ratios—centre-based services</p> <p>124 Number of children who can be educated and cared for—family day care educator</p> <p>125 Application of Division 4</p> <p>126 Centre-based services—general educator qualifications</p> <p>127 Family day care educator qualifications</p> <p>128 Family day care co-ordinator qualifications</p> <p>129 Application of Division 5</p> <p>130 Requirement for early childhood teacher—centre-based services—fewer than 25 approved places</p> <p>131 Requirement for early childhood teacher—centre-based services—25 or more approved places but fewer than 25 children</p> <p>132 Requirement for early childhood teacher—centre-based services—25 to 59 children</p> <p>133 Requirement for early childhood teacher—centre-based services—60 to 80 children</p> <p>134 Requirement for early childhood teacher—centre-based services—more than 80 children</p> <p>135 Early childhood teacher illness or absence</p> <p>136 First aid qualifications</p> <p>137 Approval of qualifications</p> <p>138 Application for qualification to be assessed for inclusion on the list of approved qualifications</p> <p>139 Application for determination of equivalent qualification</p> <p>140 Application for determination of an equivalent qualification</p> <p>141 Additional information for application for</p>
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<p>of serious incidents and any complaints which allege a breach of legislation.</p> <p>7.3.4 Processes are in place to ensure that all grievances and complaints are addressed, investigated fairly and documented in a timely manner.</p> <p>7.3.5 Service practices are based on effectively documented policies and procedures that are available at the service and reviewed regularly</p>	<p>determination of equivalent qualification</p> <p>142 Translations of documents</p> <p>143 Certification of documents</p> <p>144 Family day care educator assistant</p> <p>145 Staff record</p> <p>146 Nominated supervisor</p> <p>147 Staff members</p> <p>148 Educational leader</p> <p>149 Volunteers and students</p> <p>150 Responsible person</p> <p>151 Record of educators working directly with children</p> <p>152 Record of access to early childhood teachers</p> <p>153 Register of family day care educators</p> <p>154 Record of staff, family day care co-ordinators and family day care educator assistants</p> <p>168 and 169 Service must have policies and procedures</p>
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**Recommendation 1:** Reduce the number of National Quality Standard Quality Areas.



## Issue 2: ACECQA is not powerful, responsive or accountable enough to ensure the NQF is consistently implemented.

ACECQA began formal operations on 1 January 2012, the same date as the implementation of the NQF. More than two years since this date, little has been done by ACECQA to improve consistency or accuracy of rating decisions of state/territory-based regulatory authorities. Under the National Law, ACECQA has the responsibility of the NQF to “establish consistent, effective and efficient procedures for the operation of the National Quality Framework” (Part 11, Division 1, 225 [1d]).

Centre Support works with 3,500 services in our customer network and we regularly hear about issues relating to consistency. Our customer network extends to each state and territory, so we are in a unique position to understand the nuances between jurisdictions.

We have raised a number of issues relating to consistency and accuracy of ratings with ACECQA and to date, little substantive action has been taken. These issues include the inability of the NSW DEC to meet the National Law or to administer the National Law and Regulations by sending reports back to services outside of the prescribed timeframe. ACECQA’s response, as the national regulatory authority charged the responsibility of ensuring consistency and monitoring issues across all jurisdictions, was that we raise the issue with the NSW DEC. They cited their inability to intervene as their role is to ‘guide’ implementation of, rather than ‘administer’ the NQF. The issues had already been raised with the NSW DEC a number of times to no end. Where is the leadership required of a national regulator?

ACECQA also outlined a number of steps they would take to address inconsistency. While we believe ACECQA has moved in the right direction by creating a plan of action, the issues continue to be faced by service providers across Australia:

ACECQA's Steps	Effectiveness
Operational Policy Manual for authorised officers	<ul style="list-style-type: none"> <li>The manual is not well publicised and should be promoted online to service providers and educators, not just authorised officers. The document can provide both all parties with further guidance and clarification relating to the structure and mechanics of the NQF.</li> </ul>
Nationally consistent training for authorised officers	<ul style="list-style-type: none"> <li>Our submission highlights continued issues with assessment and rating consistency and a lack of clear information that is provided to service providers (refer to Issue 3).</li> </ul>
Authorised officer qualifications research	<ul style="list-style-type: none"> <li>Qualification requirements are not substantial enough for authorised officer, some of whom have no or little formal training and/or current, relevant experience to be assessing and rating services who must employ (or have access to) degree qualified ECTs (refer to Issue 3).</li> </ul>
National auditing arrangements	<ul style="list-style-type: none"> <li>Little information is available about how audit data will be used by ACECQA to bring about improvements to consistency.</li> </ul>

Many services we work with have also received their assessment and rating report outside of the prescribed period outlined in the National Law. When services receive their report with gaps of up to half a year, not only is the National Law contravened by the regulatory authority, a substantial amount of pressure is placed on service providers to respond to their draft report.

How can service providers recall all conversations and evidence provided at the time of a site visit six months prior to receiving their report? How can the authorised officer rate a service based on out-dated information? A service can change drastically in a six-month period. As such, families are unable to make a decision about the most suitable care option for their child due to the out-dated, inaccurate rating levels determined by authorised officers. Below is a list of late reports provided to services by the NSW DEC. The list is not exhaustive and are only the examples of which we are aware. The dates contradict the National Law.

- Site Visit: 04/07/2012. Report Received: 05/11/2012.  
2 MONTHS LATE



- Site Visit: 11/07/2012. Report Received: 24/12/2012  
4 MONTHS LATE
- Site Visit: 03/08/2012. Report Received: 21/02/2013.  
5 MONTHS LATE
- Site Visit: 12/09/2012. Report Received: 04/02/2013.  
3 MONTHS LATE
- Site Visit: 10/10/2012. Report Received: 08/02/2013  
1 ½ MONTHS LATE
- Site Visit: 04/06/2013. Report Received: 18/09/2013.  
3 ½ MONTHS LATE

Additional pressure is then placed back on the relevant regulatory authority that has to provide time for the authorised to review evidence put forward by the service. This process is also repeated when services seek a first tier review with the relevant state/territory regulatory authority and/or a second tier review with ACECQA.

ACECQA oversees the assessment and rating process across Australia. According to ACECQA, their role is to guide the “implementation of the National Quality Framework for Early Childhood Education and Care nationally and ensures consistency in delivery”. One consistency measure put in place by ACECQA is the frequency of assessment and rating visits. For example, Working Towards is every year, Meeting is every two years, Exceeding is every years).

Some services have not had a compliance or assessment and rating visit for four years. How does this give families confidence that each service is operating as per the NQF (Regulations, Law NQS and EYLF/MTOP)? What role should the National Regulatory Authority play in ensuring the NQF is rolled out consistently in each jurisdiction? Is four years a reasonable amount of time to assume the service is compliant based on prior ratings?

“The NQF aimed to visit every service in 3 years and any that were Working Toward would be visited every year until they were Meeting. This is not happening and services who are operating at a very poor standard are left alone. What will the Departments response be when a child is seriously injured, or worse, in one of these centres? We need to make it clear that the Department was warned that staff cuts and a lack of regular monitoring and enforcement have a direct impact on children’s safety. Perhaps we need to talk about going to the media to discuss the lack of monitoring that is being done. The Directorate are just waiting for ACECQA to tell them what to do. ACECQA are not our employers. The ECECD is. ACECQA won’t be criticised when a child is injured in a centre because it’s not their role to monitor them.  
**Industry feedback (name withheld) – 31/10/2013**

These issues highlight the immediate need for stronger national leadership by ACECQA to ensure the NQF is consistently implemented in each jurisdiction.

**Recommendation 2:** Increase the power, responsiveness and accountability of ACECQA.





**Issue 3: Many authorised officers are conducting outcome-based assessment and rating processes from a compliance perspective leading to inconsistent ratings and increased compliance costs.**

#### **Compliance versus outcome-based assessment and rating**

The NQS and EYLF/MTOP underpin a major shift in the approach to education and care. The former National Childcare Accreditation Council (NCAC) administered a prescriptive Quality Improvement and Accreditation System (QIAS) indicator system; the indicator was either met or not met using specific evidence. State/territory-based licensing officers were responsible for compliance. The NQF has merged these compliance and assessment and rating functions under the banner of an authorised officer.

Some former NCAC officers are employed as current authorised officers under the NQF. Additionally, many former state/territory-based compliance officers are now authorised officers and perform assessment and rating functions on top of a continued compliance function.

Authorised officers play a crucial compliance role and we strongly believe that this function should be retained. Issues arise, however, when authorised officers approach assessment and rating processes from a compliance only perspective.

Under the current outcome-based system, however, there are multiple ways to achieve NQS Elements. This misguided approach leads to inconsistent ratings for services.

Service providers are empowered by the NQS to make important decisions regarding areas of service delivery such as delivering an educational program. The NQS provides a list of the Elements that must be met, and the Guide to the NQS is simply that – a guide to implementation. In some areas, such as as delivering an educational program, services are also empowered by the National Regulations to choose how to meet the NQS and EYLF/MTOP, despite authorised officers using a compliance perspective to assess and rate services.

As an example, National Regulation 74 (Documenting of child assessments or evaluations for delivery of educational program) requires educators to ensure their educational program functions with consideration of *(2)(a)(ii) how the documentation will be used by the educators at the service*; and *[to] (b) prepare the documentation in a way that is readily understandable by the educators at the service and the parents of the child*. Some authorised officers, however, are promoting prescriptive methods of programming as though they are ‘the law’.

In contrast, other areas of the National Regulations and National Law are prescriptive and there is no opportunity for services to use their own judgement.

It is clear that many authorised officers do not understand the difference, and are assessing services as if the NQS is prescriptive, as if all examples given in the Guide to the NQS must be complied with, and without considering the content or intention of the EYLF/MTOP.

The duplication also blurs the lines between the separate compliance function and assessment and rating function of the regulatory authorities in each jurisdiction. When services receive a visit from the Regulatory Authority and are handed a 15,000 word, 48 page report, rarely are they given any clear instruction on what it is that is expected of them, what it is they could do to improve the practice based on their circumstances, or why they received the particular rating they were assigned. Removing the duplication throughout the NQF and simplifying the NQS will help alleviate this issue and will streamline the process for regulators and service providers across Australia.

“It depends on who your compliance officer is. There is no set or fair process. It is all up to interpretation. We had 2 officers for 1 day and we are only a small 24 place centre open from 8-4 each day. We felt interrogated with the amount of questioning and going through things with a fine-tooth comb.”

**Industry feedback (name withheld) – 30/10/2013**





Some Authorised officers are using outcome-based standards as a search and destroy mission to find 'something wrong' within a service. They are not using outcome-based standards as they are intended – to empower services to make local decisions about how they will best meet particular standards in the best way for their children, families and service.

As an example, below is a list of items from QA1 and QA2 in the Guide to the NQS that authorised officers could use to find something wrong within a service when conducting an assessment and rating visit. The Guide offers suggestions about what authorised officers may 'observe', 'discuss' or 'sight'.

What NQS Guide says Authorised Officer (AOs) <i>may do</i>	What Authorised Officers may require - if this is not obtained a Service may receive an adverse rating
Observe children repeating, revisiting and adding to projects or experiences they have initiated (1.1.2)	Children doing this <i>when</i> AOs are rating the service
Observe educators using routines to undertake intentional teaching (1.1.3)	Children doing this in specific routine observed by AO
Sight relevant records about each child's participation in the program (1.1.4)	Specific number of learning stories per child.
Observe educators enabling peer scaffolding (1.1.6)	Example of intentional teaching
Observe spontaneous teachable moments(1.2.2)	Educators doing this <i>when</i> AOs are rating the service
Discuss how critical reflection, assessment and evaluation are ongoing (1.2.3)	Critical reflection in specific format and style
Observe sleep and rest practices that are consistent with contemporary views (2.1.2)	Cots specific distance apart, children resting/not resting, rooms painted certain colours, babies positioned in specific ways
Observe children being provided with food that is consistent with the Australian Guidelines Get Up and Grow or Australian Dietary Guidelines (2.2.1)	All food provided must be exactly as outlined in the Get Up and Grow or Australian Dietary Guidelines
Observe hot drinks being made and consumed away from areas that are accessible to children (2.3.2)	Bottle warmers must be used instead of microwaves even where this is dangerous for safety reasons.
Observe emergency procedures displayed prominently throughout the service (2.3.3)	Emergency plans and procedures must be certified by a relevant authority.

More examples are described by services themselves at the conclusion of this issue.

When Australia's corporate regulator ASIC (Australian Securities & Investments Commission) moved from a prescriptive model to an outcome-based regulation they had to remove previous compliance officers who were unable to adapt to the new system. Early childhood education and care regulatory authorities need to do the same.

"1) Sustainability has gone way out of control. Expecting every centre to have a compost bin is ridiculous there are other ways the children can learn about sustainability.  
2) The need for natural elements - stones, bark, hay, sand, fresh flowers etc to be in every room - yes, I was marked down on one centre because it was not in every room!"  
Industry feedback (name withheld) – 16/11/2013



Does the compliance only approach increase the quality of education and care provided by services, or create a productive working environment for educators? No.

Are these issues creating unnecessary burden for services that pass this is on with higher fees for families? Yes.

“Our assessor was very tough and over the top. She also ran out of time and hardly looked at our QA1. A centre in our region had an easier assessor and they will probably end up with exceeding based on the fact that the assessor has a different work background and is looking for different things.”

**Industry feedback (name withheld) – 30/10/2013**

Over the past two years we have learnt, through the experiences of our customers, that current authorised officers are struggling to administer the NQF because many of them:

- a. Do not have the appropriate or current training, experience and qualifications to be able to distinguish their compliance role from their assessment and rating role.
- b. Are prejudiced by their views, professional background and experiences (for example, a former community-based preschool director working as a current authorised officer may be more familiar with preschool practices and favour these services over corporately-owned group long day care services).
- c. Are not carrying out assessment and rating visits in a consistent manner.
- d. Live in their services' community and have built either positive or negative relationships with each service they are visit.

“Thank you for saying out loud what I have been saying, it has already been evident that assessment and ratings have been inconsistent, what is ok in one region of QLD is not in another area just a couple of hours down the road... the NQF was poorly rolled out, it has been extremely confusing and there is lots of unwritten ideals and expectations that have appeared as best practise and nowhere was there training...”

**Industry feedback (name withheld) – 29/10/2013**

According to ACECQA's Operational Policy Manual for Regulatory Authorities, “decision-makers must act impartially and not in their own interests. To maintain public confidence in the integrity of the system, the rule also requires that the decision-maker is not perceived as being biased”.

The impartiality of authorised officers has been questioned by our customers on countless occasions. One service on the NSW Central Coast, for example, told us about her authorised officer's environmental sustainability checklist that was created separate to that of NQS Quality Area 3 (Physical environment). In doing so, the authorised officer approached the assessment and rating visit from a compliance perspective and used the checklist like the former NCAC's indicator list.

This example, and many of the examples included in our submission, demonstrates that many of the current authorised officers do not understand this fundamental difference between compliance and assessment and rating. They highlight the need for a nationally consistent approach to the application of the NQF in the context of assessment and rating visits, more rigorous training and qualification requirements for authorised officers and a clearer understanding of the difference between key functions of the NQF – compliance and assessment and rating.

“Assessors should never be compliance officers. It is in direct contrast to their position and fails to allow unbiased assessment.”

**Industry feedback (name withheld) – 6/11/2013**



### Authorised officer training

Services are burdened by the inadequate knowledge of authorised officers. When authorised officers provide services with misleading, inaccurate or unsubstantiated requests based on personal opinions, such as their own 'environmental sustainability checklist', a substantial amount of time is spent by service providers researching their practices and trying to justify their practices with authorised officers who have approached the process from a distorted perspective.

We need to provide the sector with authorised officers who have the ability to consistently and accurately assess and rate services to support continuous improvement. According to the ACECQA Board Position on Authorised Officer Qualifications (December 2011), "from 1 January 2014, each jurisdiction will aim to have more than 50 per cent of its authorised officers holding early childhood education and care qualifications, whether at diploma, degree or higher degree level".

What are the current levels of authorised officer qualifications? Why aren't all authorised officers degree qualified? Addressing these issues will raise the level of knowledge, experience and qualifications to a standard expected by the NQF – the system they're charged with the responsibility of administering.

Authorised officers initially received four days training. In this time they needed to cover 819 pages worth of standards and legislation (including the NQS, EYLF/MTOP, National Law and National Regulations). These authorised officers are assessing services who employ educators who may have 20 or 30 years hands-on, current experience and 4 year university degrees completed recently. How can an untrained or diploma-trained assessment and rating officer have adequate qualifications, knowledge and experience to assess an early childhood teacher?

We recommend that each assessment and rating report should be prefaced with a statement outlining the assessor's experience, education level and institution from which qualifications were obtained, and background (for example; community-based director, preschool educator, for profit service owner).

How can somebody with less knowledge, less qualifications and less experience assess and rate services with highly trained and degree-qualified educators? It is professionally offensive. Most assessors do not understand current practice. Assessor qualifications are not up-to-date.  
**Industry feedback (name withheld) – 29/01/2014**

### Power relationship

The power relationship between the compliance officer/assessor and service is also out of balance. Many previous compliance officers acted like investigators and this approach has been brought forward to the current NQF.

This impacts on quality of education and care and drives experienced people away from the early childhood education and care profession. When assessment officers are loathed by the sector, they have created a situation where they can no longer do their job effectively. This is putting children's lives at risk.

### Increased compliance costs

The inability of assessors to conduct assessment and rating visits as per the NQF creates financial burdens for services and taxpayers. When services receive an inaccurate assessment and rating report, they spend up to two weeks of their time compiling evidence and comments in response to the regulatory authority. In most cases, Nominated Supervisors are pulled away from their usual responsibilities and workplace functions to provide a response to the relevant regulatory authority, and to initiate first and second tier ratings reviews.

We believe it is time to contract non-government organisations with properly trained, competent assessment officers who are early childhood degree qualified and ISO 9001 audit qualified to complete the assessments. The practice is common place for professional industries including doctors, lawyers and psychologists.

Educators in this sector are working their guts out. Those who are studying are working even harder and they are taken away from their annual leave to do prac.  
**Industry feedback (name withheld) – 22/01/2014**



**Recommendation 3:** Return the role of state/territory-based regulatory authorities to one of compliance and contract independent non-government organisations to conduct assessment and rating functions.

The following examples highlight how authorised officers are conducting outcome-based assessment and rating processes from a compliance perspective leading to inconsistent ratings and increased compliance costs.

### Example One: inappropriate and aggressive approach

- A service in Kiama NSW had to call the NSW Police Force due to the behaviour of the NSW Regulatory Authority's Assessment and Compliance Officer (ACO).
- The ACO was so aggressive, threatening, rude and unprofessional that the Nominated Supervisor called the Police. The Police contact the Regional Manager to discuss the behaviour of the ACO and advised that the Police informed the service to call 000 if the ACO arrived.
- As an employer, you are also bound by other legislation including the need to maintain a healthy and safe working environment free from discrimination or harassment.
- The service wrote a letter to the Regulatory Authority stating that if the ACO attends any of their services again, in any capacity, he will be refused entry.
- Educators are entitled to carry out their duties without the threat or intimidation of this officer.
- The service also asked that for future compliance checks, the Regulatory Authority assign an alternative officer. In the event that the ACO attends the service, they will initiate proceedings to have him restrained.
- Additionally, the service now implements a policy (checked by two legal experts) that requires the Nominated Supervisor to film the entire visit by any assessor at their service. In implementing this policy the officer must not be hindered in exercising their duty under the Education and Care Services National Law or Regulation.

### Example Two: inconsistent approach to bottle warming

- Centre Support provides policies and procedures to services on the use of microwaves and bottle warmers.
- Two of our clients were assessed with different results despite following the same processes and using microwaves to warm baby bottles – NQS Element 2.3.2.
- A centre on the NSW Central Coast marked as exceeding and a service on the NSW far-north coast was marked as not met.
- A service in the Sutherland Shire, NSW, reported to us that her Authorised Officer tried to force the service to remove their microwave entirely and take a photo of the space where the microwave once sat to satisfy the Authorised Officer that it was removed.
- One assessor makes the process too subjective which allows difference of standard and opinion of that assessor and their judgement to determine the rating. Their experience, thoroughness and understandings may vary from her peer assessor which may result in differing ratings for an equivalent standard service. They are not looking at the process of reflection, self assessment only the end result. They are not looking at the context of the situation. Rather, Authorised Officers are only looking at what they believe is 'correct'.
- An Authorised Officer from the DEC originally told the Nominated Supervisor the NSW Central Coast, that the DEC's regional operations manager said the use of microwaves to heat baby bottles "has to stop" and that the service will be marked as not met. The service conducted a detailed risk assessment and analysis of possible ways to heat bottles (in an area that was previously approved by the DEC for the purpose of an infant's area) to determine the best possible way we could protect children.
- The service considered that the bottle warmers were not an option in this environment due to the high possibility of scalding and electrocution. The service had adopted a detailed procedure which was embedded into our practice supervised by senior educators which was the safest option. It took the Nominated Supervisor of the NSW Central Coast five business days of her time to resolve the issue with the DEC to be told exactly what we already knew – the NQS is not a "one size fits all" system. It is outcome-based and the Regs/Law does not prevent services





from using a microwave. She spent these five days of her time consulting relevant professionals, writing response letters, researching and seeking clarity with the DEC.

- The issue was escalated to the DEC's State Operations Manager who conducted an investigation with her inter-jurisdictional counterparts.
- Taxpayer money was used to conduct this investigation across the jurisdictions to tell us what we already knew - the NQS is not a "one size fits all" system. It is outcome-based and the Regs/Law does not prevent services from using a microwave.

## \$2626.47 is directly passed onto parents

Cost to Service to respond to inaccurate assessment and rating report		Estimated Cost to Taxpayers to respond to inaccurate assessment and rating report
5 days of Nominated Supervisor time (writing letters, research, responding to DEC)	\$1242.22	We don't have the figures to make an accurate evaluation of the cost to tax payers. However the below points need to be considered: <ul style="list-style-type: none"> <li>▪ Original assessment and rating visit</li> <li>▪ Review of ratings (First Tier Review)</li> <li>▪ Senior staff investigated issue</li> <li>▪ Spot check</li> </ul>
Staff meeting/consultation * ** ***	\$984.18	
Committee meeting/consultation with director after hours	\$98.07	
Sub Total	\$2326.47	
plus on cost superannuation, insurance roughly 13.5% - 15%		
<b>Total (directly passed onto families)</b>	<b>\$2626.47</b>	

\* Staff meetings are to be paid for as per Modern Award at time and half.

\*\* 14 staff members

\*\*\* Staff meetings are 2 hours in duration

- 1 Director/Nominated Supervisor at a pay rate of \$32.69 per hour
- 2 Early Childhood Teachers at a pay rate of \$28.89 per hour
- 6 Diplomas at a pay rate of \$22.39 - \$25.32 per hour
- 5 Cert III at a pay rate of \$20.65 per hour

## Example Three: assessor's failure to gather evidence

- An Assessment and Compliance Officer, Early Childhood Education and Care Directorate within the NSW Department of Education and Communities conducted an assessment and rating visit in south-west Sydney on July 18 2013.
- The ACO chose not to gather evidence leading to an inaccurate assessment and rating. The service was rated 'Working Towards' for NQS Element 1.2.3.
- According to the report, "educators acknowledged critical reflection happens verbally but is not documented. Educators are using a curriculum reflection sheet with posed questions for educators to add comments and rate the day, although these questions are not linked to the program, routines or specific experiences".
- The assessor chose not to gather evidence leading to an inaccurate assessment and rating. The educators recall being told that 'I should be able to see everything' at first glance and that you did not investigate further by 'sighting, observing and discussing' evidence as per the Guide to the NQS, therefore the service's rating is not accurate.
- However, the service had over 300 reflections documented for their service over the past 12 months. The service implements a thorough and well-documented critical reflection process. Educators at the service feared retribution from you and the regulatory authority due to their complaints about the inaccuracy of their assessment and rating report.
- The service was burdened by the additional workload to respond to the inaccurate report. The Nominated Supervisor of the service spent 6 business days compiling evidence to respond to the report as you chose not to consider all of this evidence. Families are unable to make an informed decision on suitable care for their child based on inaccurate ratings. The NQS was introduced to implement a nationally consistent approach to assessment and rating to allow





families to make an informed decision about the most suitable service for their child. This is not possible when ratings are determined by inaccurate assessments.

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#### Example Four: assessor influenced by personal opinion

- One service was marked down to 'Working Towards' because they turned the lights off for one hour during Earth Hour. Their assessor told them the room was too dark. The NQS, however, has a strong focus on environmental awareness and sustainability. When assessors send mixed messages to service and inaccurately rate services, they waste taxpayer money by increasing the frequency of assessment and rating visits.
  - The service and the regulator are also burdened by the time and cost of having the decision reviewed and changed.
- 

#### Example Five: assessor did not understand meaning of agency

- One service was told by their assessor that children should not have access to a broom because it was determined to be unhygienic. This is in complete contradiction the sense of childrens agency promoted by NQS 1.1.6 - Each child's agency is promoted, enabling them to make choices and decisions and influence events and their world.
- 

#### Example Six: compliance approach to assessment and rating

- One Nominated Supervisor mentioned that her rating was pulled down because 'during school holidays, they have slightly fewer learning stories documented because they have fewer children attending'. The service was marked down based on an arbitrary number set by the assessor. The opinion of this assessor contradicts the professional judgment of the educators at the service who create their curriculum based on the EYLF and National Regulation 74 (Documenting of child assessments or evaluations for delivery of educational program). Regulation 74 requires educators to ensure their educational program functions with consideration of *(2)(a)(ii) how the documentation will be used by the educators at the service; and [to] (b) prepare the documentation in a way that is readily understandable by the educators at the service and the parents of the child.*
  - The poor training and experience of the assessor has led to a misinterpretation of the curriculum and again led to wasting taxpayer dollars by increasing the frequency of assessment and rating.
- 

#### Example Seven: misinterpretation of practices

- One service was marked down to 'Working Towards' because their educators attentively changed a child's soiled nappy during morning tea time. Strict hygiene procedures were adhered to. The assessor, however, suggested that the child should have been left to sit in her soiled nappy and continue her meal with disruption.
- 

#### Example Eight: assessor using inaccurate information to assess services

- One service was marked down to 'Working Towards' because the assessor incorrectly noted the times children were playing outside. The assessor alleged that the service had children outside without sun protection while the UV rating was 3 and above. The service, however, has a daily musical experience planned each day and were inside when the UV rating was 3 and above. The service used the Australian Radiation Protection and Nuclear Safety Agency website to confirm the UV rating for the alleged breach period.

#### Example Nine: assessor using personal opinion over NQS

- An Assessment and Compliance Officer, Early Childhood Education and Care Directorate within the NSW Department of Education and Communities conducted an assessment and rating visit on November 12, 2013 in Western Sydney, NSW.
  - Rebecca used personal opinion and personal preference instead of promoting the intent of the NQF. The service was advised that they should not fundraise for the Children's Hospital because it is too far away from the service, and that they should fundraise for the Campbelltown Hospital instead because it is closer to their local community.
-

#### Issue 4: The current rating system and levels do not provide families with an accurate overview of quality.

##### Overall ratings

The whole basis of the NQS was for families to be able to choose high quality based on accurate ratings. The current system contravenes this aim as it allows for 57 of 58 NQS Elements to be rated 'meeting the NQS' and one NQS Element to be rated 'not met' with an overall rating of 'Working Towards'. What can a parent gain from an overall rating using this model? Do they understand the NQF system enough to conduct a detailed analysis? Certain NQS QAs are also more important than other QAs. For example, QA2 relating to health and safety are more important for service providers to adhere to than QA3, 3.3 – environmental sustainability. An overall rating has no provision for these nuances to be recognised.

"Remove the overall rating immediately. Educators... are mostly intelligent, caring and committed individuals who are made to feel inadequate, insignificant in their role and completely inept by assessors... who clearly are out of touch".

Industry feedback (name withheld) – 6/11/2013

Some authorised officers have also indicated that they will not give out exceeding. Have the regulatory authorities set arbitrary quotas in an effort to minimise the amount of services obtaining the highest possible rating levels? Can service providers and families have confidence in the rating system?

'I don't give out Exceeding'.

NSW DEC Central Coast Assessment and Compliance Officer

##### Rating terminology

We believe that the words 'Working Towards' should be replaced with something more positive like 'within range' or perhaps a code such as P1, P2 or P3. 'Working Towards' is destroying the confidence of educators and the reputation of the service and Nominated Supervisor. Additionally, the words 'Working Towards' are misleading, cast doubt on quality and are picked up in a negative way by the media with no understanding of what is required from an ECEC service. 'Working Towards' sounds like a service should be shut. We don't need a word that sounds like a fail. ACECQA says this is not the intent of the 'Working Towards' rating, however the media and the general public have presumed otherwise. We need better words to replace 'Working Towards', such as 'within range'.

##### Impacts of inaccurate ratings have the ability to completely destroy the positive intent of NQF

Two main issues arise when services do not feel their rating is an accurate reflection of their service: services will spend months and months re-preparing for assessment and rating and work to improve their service if required, or they will disengage from the NQF.

"If I may provide a similar example in school education. Years of avoiding to tell children and their parents that their school results are inadequate (e.g. they failed a subject) has been proven to result in reduced effort from students and confusion for parents.

Industry feedback (name withheld) – 15/11/2013

Additionally, inaccurate and misleading ratings having negative impacts on the marketability and potentially the profitability of services. More frequent re-assessment also occurs when ratings are at the lower end of the spectrum, increasing the bill for taxpayer-funded assessment and rating visits.

"Our educators have worked like slaves to upgrade their qualifications and get their heads around the new expectations. To be rewarded with 'Working Towards' as an overall rating sends the message... that they have only just got out of bed to start the day".

Industry feedback (name withheld) – 7/11/2013

**Recommendation 4:** Remove the overall service rating and rely on individual Quality Area ratings. Replace the 'Working Towards' rating level with a more positive term such as 'within range' or a code such as P1, P2 or P3.



## Section Two

# APPENDIX OF INDUSTRY FEEDBACK RECEIVED BY CENTRE SUPPORT

In October 2013, Centre Support published an NQF Newsletter canvassing our original recommendations to be put forward as a part of the Productivity Commissions review. We have included directly quoted copies of the feedback we received. All personal details have been withheld to protect services from the fear of retribution from the Regulatory Authorities.

### 1. Received 29/10/2013

Thankyou for saying out loud what I have been saying, it has already been evident that assessment and ratings have been inconsistent, what is Ok in one region of QLD is not in another area just a couple of hours down the road. No the NQF was poorly rolled out, it has been extremely confusing and there is lots of unwritten ideals and expectations that have appeared as best practise and nowhere was there training in this area. Trying to keep up with all the changes has been a nightmare and the workload and mental capacity to keep up with all the different aspects of the industry has been horrendous, lots of directors are looking to change into other industries, as well as trying to attract staff and retain them with the poor remuneration is also a nightmare, I lost a staff member last week as she couldn't afford to work here has gone to a better paid job with less responsibility and no extra training requirements, I can't compete with that. The certified supervisor new forms are outrageous, no other government department has that much information on file of one person, don't need that much information to gain a passport, why do they want so much information, where are they storing it and for how long, it is a huge barrier for staff not to take on that role. Staff are choosing not to be a certified supervisors and this is creating huge rostering issues, if you have staff on holidays and staff away sick, do they expect staff to stay on for 10-12 hour shifts as an ongoing scenario, how long will staff last if that occurs regularly as it often does, I have experienced on some days 4-5 staff away with holidays and illness etc. I am sorry; I am not staying at work all day so I do not expect my staff to do so either. As well having our name on the ACECQA website for all to see is to me an invasion of our privacy, what other industry has that.... Sorry but really angry about this particular issue.

Yes I agree we need to have the old centrally based assessors as the issue was always how does everyone know how the rest of Australia is going with their services, if everyone is stuck assessing in one small area. I think a combination of paid and peer assessors are the way to go. The ratings are very ambiguous and I think the NQF snapshot highlights the issue of inconsistency as some states have lots of services Working Towards and others don't, to me that indicates that there is inconsistency between states, but I know personally that the closest region to us has different expectations to our assessors, I would like to see our regional officers as supportive and mentoring professionals with external assessors, but the reality is that anyone can look good for two days.... I feel that there has to be better systems to ensure that services provide high quality services. We are all here for the children and they seem to be forgotten in all of this.

I will be emailing Sussan Ley as there are many issues.

Thanks for that could really go on about it for ages. Again the children are the ones who are missing out.

Hi just to add to my previous email 60 days to allocate a certified supervisors certificate is not just good enough, it is way too long for services to manage rosters. Two weeks should be more than enough time.



## 2. Received 29/10/2013

I would like to comment on the need for an early childhood teacher (ECT). I think it is a great idea to raise the quality standard of services and I believe having an ECT is one way to help do this, however, I believe the way it has been introduced is ridiculous. The government needs to firstly increase the status of early childhood educators in child care centres and increase the money back to families so that we can raise the wages. This way we can hire a teacher that is of some quality. Otherwise, if we try to hire an ECT at only \$25/hr the only ones we get are those that can't get a job in a school(I know, I had one and they were no good at all). I mean who will work 7.5 to 8 hrs a day, 48 weeks of the year, for \$25 when they can work less hours, have more holidays and start on a minimum of \$35/hr. The other thing is Diploma staff will not be happy if they are doing the same work and only the teacher gets a decent wage, so all wages need to go up.

However, I can't imagine the current government putting money into child care when they are making cuts to education. Sad, isn't it.

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## 3. Received 30/10/2013

Hi there,

I highly support Centre Support's points:

1. Remove the overall rating immediately One minor issue shouldn't destroy the reputation and confidence of a hard working service and educators.
2. Remove the words 'Working Towards' from the document immediately We don't need words that sound like a fail.
3. Remove the assessment process from state and territory regulatory authorities The power relationship between the compliance officer/assessor and service is out of balance.
4. Ensure Assessors ARE NOT compliance officers. Former licensing officers just can't take their compliance hat off and become assessment officers.
5. Respect us as professionals. Provide us with assessment officers that are experts in assessment and have current knowledge that will recognise our quality and support continuous improvement.

My additives are;

1. When we receive our DRAFT report (A&R) they give you the opportunity to respond. When you respond they send your FINAL rating without a response/feedback to your response! It was a total waste of time. My response was 3 pages supplying evidence of how we met NQS in 2 elements. I did not have time to fight this or the \$400+ to take this further as I am currently relocating to a new premises. THAT was my priority at the time and my response was devalued so why bother?. THEY STILL SHOULD GIVE FEEDBACK TO YOUR RESPONSE IF IT DOES NOT ALTER YOUR RATING. What a waste of time and value for all my centre does. We broke our backs trying to do our BEST and 2 points were missed due to misperceptions that I pointed out in my response.

2. It depends on who your compliance officer is. There is no set or fair process. It is all up to interpretation. We had 2 officers for 1 day and we are only a small 24 place centre open from 8-4 each day. We felt interrogated with the amount of questioning and going through things with a fine-tooth comb. And yet, up the North Coast (where I have a close friend working) it was SO LAID BACK that the Diploma trained worker(for a small 20 place centre) was not asked ONE QUESTION! That centre received only 3 Working Towards they had to fix up but there were multiple things that needed fixing. I know because I have helped them in other areas. No wonder they are all receiving EXCEEDING up there.

3. There should also be an advisory service that CAN HELP YOU ACHIEVE A BETTER RATING. We got marked down on the fact that I did not have my own APPRAISAL PROCESS. That was what she asked for. And yes, I do not have my own STAFF APPRAISAL like the staff. I have my own annual INDIVIDUAL LEARNING PLAN with goals and objectives for the future. This is what the NQS states but was never taken into consideration. Her interpretation was different to what the NQS actually wants. And yes, my response was never even considered or even read as far as I'm concerned. ACECQA cannot give you ideas on how to rectify this point. I have enquired.





4. Also the 50% Diploma or ECT that is coming into effect in Jan 2014 is going to cause problems when there are absences of the specially trained staff. How can I replace an ECT when she is sick for a day? It should be stated in the regs that replacement is only necessary if the absence is a time period of more than 12 weeks or so. We are a small centre and already the costs are sky high for parents. I have had people leave the centre to opt to stay home as its all getting too expensive.

There is nothing in the regs to support Diploma Absences.

5. WE NEED HELP from the govt with funding For ALL CENTRES, not just preschools and community based. PRIVATE centres are providing a service the community needs as well. It is the families choice where their children attend so why do we always miss out? We still have to abide by the same laws.....They have created the new laws but WE are expected to manage the costs. It's all wrong!

6. Put surveys out there to the families....see how they feel about the new changes.I can guarantee you, there will be a lot of negative feedback from the ILLAWARRA. Isn't it all about Collaboration with FAMILIES? I have suggested some families contact the Reg Authority about it all as they were SO UPSET with our rating recently. I did this as I felt WE DIDN'T HAVE A VOICE, Maybe THEY will.....

I opened my own centre because of my love for young children.

Now I feel i have let them down as I continually make my centre "perfect" for the NQS (at the expense of time with the children) and then be devalued by Authorities and the system.

I wish we could all go back to how it used to be 20 years ago. A lot easier and more relaxing. HAPPY CENTRE, HAPPY STAFF, HAPPY CHILDREN & HAPPY FAMILIES.

Good luck in your fight and please make this entry anonymous to protect my identity.

I do believe they will target me and make it even worse.

How negative is that?

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#### 4. Received 30/10/2013

Hi

Thank you for your interesting newsletter.

I am a private service and have found there are major inconsistencies with assessors and this is not fair at all. There is inconsistencies between community based centres and private centres which is unfair. I would like to suggest the following:

- there should always be 2 assessors present to avoid subjectivity of one assessor and provide greater consistency as both assessors would have to agree on their findings.
- the same 2 assessors should assess the entire region to ensure they are benchmarking across the region and ensure consistency so that when parents look at the ratings they know the same assessor has rated all these centres so the findings are more comparable.
- Meeting the NQS should also be changed to sound more positive. It is so hard to get meeting and it does not sound that appealing nor do parents understand how hard it is to receive this rating. (A suggestion could be that Meeting the standard be renamed to high quality and exceeding be very high quality).
- our assessor was very tough and over the top. She also ran out of time and hardly looked at our QA1. A centre in our region had an easier assessor and they will probably end up with exceeding based on the fact that the assessor has a different work background and is looking for different things. I don't think this is fair at all given we are doing the same things. Our assessor has been known to look in bins and check recycling completed correctly. This is nuts.

I hope you can pass on my suggestions.  
Thank you





## 5. Received 31/10/2013

Thank you for your insightful article about the NQF. I am an Assessment and Compliance Officer and I am involved with union discussions with the ECECD about how our current role is affecting us. This is part of a recent correspondence I sent in relation to the NQF.

There are a few areas that I think need to be addressed as the wheels on the NSW NQF implementation seem to be getting wobbly.

Why aren't positions being filled when staff leave. Southern has lost their Admin and they won't be replaced. Western have had .6 of a position vacant for over 12 months due to maternity leave and the investigator position has been vacant for nearly 12 months. Why does the Directorate feel that it is OK to save money on wages and positions when we are all working madly to reach targets. Who is funding this scheme? Surely if it is a Commonwealth initiative it is being funded by the Commonwealth. Why is the NSW government trying to save money that is actually Commonwealth funding? Pru Goward was on the front page of the Herald yesterday because her regional managers were not replacing front line Case workers in an attempt to meet budget cuts that were imposed on them. Budgets are allocated for a reason.

The NQF aimed to visit every service in 3 years and any that were Working Toward would be visited every year until they were Meeting. This is not happening and services who are operating at a very poor standard are left alone. What will the Departments response be when a child is seriously injured, or worse, in one of these centres. We need to make it clear that the Department was warned that staff cuts and a lack of regular monitoring and enforcement have a direct impact on children's safety. Perhaps we need to talk about going to the media to discuss the lack of monitoring that is being done. The Directorate are just waiting for ACECQA to tell them what to do. ACECQA are not our employers. The ECECD is. ACECQA won't be criticised when a child is injured in a centre because it's not their role to monitor them.

Remote communities are very different to metropolitan communities. Services in towns and villages across NSW are desperate for some interaction with ACO's about the NQF but we are unable to provide them with the support we used to provide. Receiving document after document by mail or email does not work for these communities. Training opportunities are rare and often expensive to get to. It has taken years to develop a trust and rapport with these services and this is being lost under the weight of the NQF. Maintaining relationships is very important in the bush. Also, we are really only responding to the issues that the sector self reports. What about the dodgy centres who don't do this?

ACO's are very stressed and bored by the monotonous and time consuming report writing. It doesn't matter how fast we work there are still 6 more lined up after we have finished a report. There is no sense of completion or a feeling of a job well done. This has been consistently reported to managers but very little has been done to address it. We were given tablets a few weeks ago and a training session on how to turn them on. How about some training on how to use them quickly and efficiently. They will only help if they are faster than a paper and pen. They aren't at the moment.

Do services really need a 15,000 word report to tell them what they already know. There has to be a more efficient way to use tax payers money.

We have been very professional, patient and polite throughout this NQF implementation period. Some of our colleagues have resigned or been relocated and we have stood and watch it happen. This type of monotonous work is actually hurting people. Things like a work to rule initiative, or a directive to only perform certain duties may need to be adopted before we are taken seriously.

I am happy to expand on these thoughts. We need to do something to improve the system. Thank you again for your article. It is the first I have seen that looks at the problems the NQF is causing.

## 6. Received 6/11/2013

Hi There,

I had a not so pleasant experience during our Assessment Visit earlier this year. Whilst we were graded as "Meeting" which is ok I suppose – I think we should have been graded as exceeding.



Our Assessor was very pleasant, but made comments after the visit that really alarmed me. I will refer to a couple of them – they are not word for word.

The centres that were achieving “Exceeding” in the leadership area tended to be private school ELC’s with a Principal and HR department. Apparently my service achieved a very high “meeting”, but of course as a privately run centre there is no principal or HR department – so we can’t compete and achieve exceeding.

Kinders with only 3 and 4 year old children are tending to do better as the structure/routines/play etc in the rooms of children in the older age groups lend themselves more easily to the ideas etc in the NQF. The NQF is harder to implement in a the under 3 rooms of a service. Our Assessor suggested feeding the babies one at a time as an example. So impractical. (As soon as our little ones see the lunch trolley there is a stampede to the tables and high chairs!!!)

If this is the attitude of ACECQA they must compare apples with apples. Child Care centres catering for babies and toddlers – assess them separately to centres/kinders etc that cater only for 3 and 4 year olds. Also, assess ELC’s in private schools separately – there is much more money to pay for staffing and bells and whistles in these establishments.

We only achieved a “Meeting” for Relationships with Children. We are particularly careful to employ only caring and attentive staff. I was absolutely gobsmacked to find that was our awarded grade. Any time you walk through my service – staff are engaged with children – chatting with them, playing with them etc.

Whatever training the Assessors are given – should be available to centre owners/directors/managers etc. There is a shroud of mystery around “exceeding”. If the Assessors can’t give us detail about what Exceeding looks like – that is not fair.

I think the suggestion that the overall rating should go is an excellent one. At least then the focus would not be removed from any area/areas where exceeding is achieved.

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## 7. Received 6/11/2013

Wow what a great newsletter this month. I knew there were lots of inconsistency out there but this proves it. My Time Our Place is my framework and we are doing all we can to implement the requirements. Very, very worried and may I say on behalf of all OSHC services that... we need our own framework. This is what I think needs to be reviewed as far as the NQF goes. Please don’t forget us when fighting for more say as far as a review goes.

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## 8. Received 6/11/2013

Wow I completely agree with your information. The assessment process is considerably flawed, inconsistent and affronting. Remove the overall rating immediately.

Educators working within the industry are mostly intelligent, caring and committed individuals who are made to feel inadequate, insignificant in their role and completely inept by assessors and DECS workers who clearly are out of touch and have no idea of the daily work caring for and educating our young children.

I agree to immediately Remove the words 'Working Towards' from the document. Perhaps a rating of 1 for best, 2 for 2nd best and 3 for third best is more acceptable instead of words perhaps

I agree who need to Remove the assessment process from state and territory regulatory authorities as the power relationship between the compliance officer/assessor and service is out of balance. Many of these officers are simply bullies. They arrive with a ‘got you’ mentality, are rude, condescending, picky and to my knowledge have never offered assistance to any service. I have pages of evidence backing this and have written to both the Minister and Director General with complaints, none of which have ever bothered to respond.

Assessors should never be compliance officers. It is in direct contrast to their position and fails to allow unbiased assessment.



We all believe we are NOT Respected as professionals. We are professional educators who work daily in our field. We are ethical, hard working and responsible individuals who take our role and position seriously and care for the children we educate. We are instead treated like inept idiots who know nothing about what we do.

The NQF and EYLF is somewhat a joke. While I believe it was intended to improve quality it has failed due to its stupidity. Babies for example should be babies, to learn and experience a range of activities with their carer. Now educators must remove themselves from the interaction we use to have with our youngest children to document, plan and observe. Cruel actually for both the babies and the educators.

Same goes for our older children. Every educator will advise their time they use to spend sharing and teaching the children has been removed and cut back significantly. This is not satisfying the child's requirements. And allowing each child to dictate what they want to do, when they want to do it and how it will work is simply insane. They are children, with very limited knowledge who require guidance from those of us mature and trained to lead them. Many kindergarten teachers express considerable concern over how they will manage the children coming into school that are instructed to pack up, go to lunch or recess, come back into class, sit quietly during group work, etc, when the EYLF is pushed towards the children having free reign. This is considerably confusing for children and undermines the position of parents who require their child to sit, eat, pack up when they require, not when a child decided to do it or not.

It is unworkable and will fail to achieve a responsible guided child towards formal education. Infant teachers will spend a good part of their year unteaching all the bad habits children have learned using EYLF.

Consultation with educators is the first step before academics make these preposterous new regulations and rules. I am yet to meet any parent or educator who believe that half Diploma staff is needed, let alone wanted in services. This will simply escalate costs for little to no benefit of our children. We are not a University, we are caring and guiding our babies and toddlers. Think about this logically please.

Keep up the fight... well done. Full support is given to you. Now may be the best time to relook at this stupid system with the new Liberal Government.

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## 9. Received 6/11/2013

Hi there

In response to your email, please find my feedback as follows:

### 1. There should be four ratings:

- \* Unsatisfactory - this is for elements that are not met and show little or no evidence of Working Towards
- \* Documented or Understood - this is for elements that are not met but the QIP details how it is being worked towards and this explanation is satisfactory
- \* Meeting - as is
- \* Exceeding - as is

I don't care what they are called but I would like to see the bottom level split out and a distinction made between services that have identified problem areas and those that have no clue a problem area exists.

### 2. ECT requirements

Why does every other state allow for ECTs to be away for a period of up to two weeks without replacing them, and NSW not? How can we attract quality ECTs when we can't match the school system? At least in terms of holidays. It's impossible to get quality ECTs. IMPOSSIBLE. This law is impossible to comply with.

### 3. Assessment criteria



Forget the "every service is different and will be judged uniquely" approach. They may all be different but some assessors judge them in exactly the same way. It's ridiculous. Tell us clearly what you're looking for and judge us on it, rather than this "open" approach which isn't working.

#### 4. Be firmer on dodgy operators

The DEC knows who the dodgy operators are, and yet 20 years on the same people are still operating. Get a backbone and get rid of them from our industry.

#### 5. Introduce mandatory testing

The qualifications need to include mandatory first aid for ECTs just as it is for Cert Ills and Diplomas. Mandatory for everyone should be Anaphylaxis, Asthma, Food Handling updated every three years. In addition a mandatory Regulations test should be undertaken for all educators and assistants. People should know the law, it's ridiculous how many people come out of course (all courses!) and have no idea of even the name of the Regulations.

#### 6. Introduce accountability

Stop putting everything on the Approved Provider, we are one person. Make all staff accountable, including but not limited to the Nominated Supervisor.

#### 7. Recognition of services with a compliant Approved Provider

I feel I go above and beyond to make my service the very best. I self-report every incident/complaint (not that there are many), I function within the law at all times (except the ECT requirement but that is 100% out of my control), I pay my staff well, I treat my staff well, I support the DEC etc and I want some recognition for my hard work as it doesn't match our rating - yet. I won't stop until it does but I feel as management our commitment, professionalism and law-abiding behaviour should be acknowledged.

Finally, I'd like to share with you some feedback on our A&R. Overall I think the assessors were generous and trusted that I was honest and upfront when they were given negative comments to the contrary by a small group of staff and a small group of families. However, we did not get Exceeding for one element which I felt was ridiculous, given:

\* Our food menu is beyond Munch and Move recommendations, everything is home-made on site, from scratch using fresh, seasonal ingredients. We develop our own recipes to take advantage of brown products over white (brown rice, wholemeal flour etc) and to limit fats and sugars by using fruit juice and fruit to sweeten recipes. Our menus and Kitchen staff absolutely EXCEED the requirements.

\* We have implemented several unique programs, including indigenous culture

\* Our staff are over qualified. We require 3 ECTs, we had 3.5 ECTs. We required a further 2 Diplomas but we had 4. We only require 9 staff but overstaff with 14 staff. Of which, all Cert Ills were studying their Diplomas except one. How is this not EXCEEDING expectation?

I could go on, but I'm sure you get the point.

On top of this we were marked down for not using gloves at baby nappy changes. I refuse to approach a baby several times a day with plastic hands. My hygiene was not different as to whether I had gloves on or not - I washed my hands first and at the end, I never touched a child's nappy area and if I need to put cream or wipe them then I will use a glove. Of course, if their nappy is dirty I absolutely use gloves! It's not necessary for wet nappies and it was easily and clearly explained. However, nothing I said mattered as it all came down to Staying Healthy In Child Care.

So if this is the case why can't they just say we need to follow everything in SHICC or we'll be marked down?





## 10. Received 6/11/2013

Our service has been around for 21 years. We were the first in our state to go through the original Accreditation and have seen so many changes. I must say that our experience before the NQF was introduced was probably the most positive and this was mainly due to having clear and concise points within the accreditation to adhere to and to show evidence for. At that time we either did what was asked or we didn't. While there was still room for judgement based on the reviewers opinion and state of mind on the day of review, if we could have the evidence then more than often our accreditation would be successful.

We feel that NQF isn't as clear and that everybody seems to be doing what they think according to how they interpret something. I could walk in to a service where children are allowed to eat whenever they like which is ridiculous and I could also walk in to a service which has a period of time allocated within which to encourage children to have a snack and where handwashing and hygiene is monitored which makes far more sense and really from reading the information in the NQF, what really is the right way to go about it?

All we have ever wanted to know is what is actually expected of us so that we can all be doing the same thing regardless of where we are located and who runs the service. This has never been clear to me in reading the guidelines and the NQF has only made it worse.

To add to the boiling pot is the quantity of paperwork involved. We aren't day care centres anymore where children learn through play. We don't have time to truly sit with the children and play with them and watch them grow because we are all too busy taking photos and filling in silly Learning Stories. I understand the importance of having evidence for children's learning but really this is just ridiculous. What was wrong with doing a written observation once every 8 weeks and gathering of children's craft with a few photos and a developmental checklist? Now our time is spent trying to work out what outcomes we have met and what part of the NQF we have satisfied. We are driving child carers out of the industry because they can't cope anymore and the stress is intolerable.

And finally respect. Well that's a topic I could on about forever. When I read in the regulations that we would require a teacher within our service to monitor our programmes and curriculum I wanted to throw up. I felt like I was worthless and that the 21 years I had spent being the second parent to so many children and watching them develop from little newborns to being ready to go to school were a waste. I don't need some teacher to come in to my service and tell me whether or not my programmes are any good. I think I could teach a few teachers some valuable lessons about child care and how valuable and important our role in society is. My programmes are fantastic and until this NQF business came around we used to have some fantastic themes to work on and our being able to plan in advance and have set activities which varied everyday was an exciting part of the learning and education we provided to children. We evaluated what we did on a weekly basis and this meant we had time to be prepared with exciting resources and this meant we had more time to be involved in the child's day. Now I have to be spontaneous and allow the children to decide everything and then pull time out of my hat to expand on those ideas and then observe those ideas and show what outcomes I have met and hope to God that I have all the resources to meet these ideas ready to go. What a load of crap. This is why new carers coming in have no idea and we are having to teach them as well and to show them how to come up with craft activities, songs, games, spontaneous play and dressups. There is no structure within which they can work which allows them to go into resource books and work with the Qualified carers to come up with exciting ideas for the following week's theme. They don't sit and prepare craft anymore. They don't have to come up with suggestions which they then put in to practice for the children because they have to wait for the child to make the suggestion and unfortunately there isn't always time to just go and prepare a craft activity or game dependant on the child's suggestion. Yes we do have to be spontaneous but the world doesn't revolve around what children want all the time.

We are Child Carers. We are the second family in a child's life. We spend their days with them, watching them laugh and grow. We see many come in as new babies and then cry when they leave us as kindy kids and we even laugh when many years later we see them with families of their own and they still bring a tear to our eye. We are invaluable. We can't be replaced and what we do every day without complaint in sickness and in health can't be priced.





The NQF needs to wake up to itself and see all this. Only then can they make changes which make sense.

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### 11. Received 7/11/2013

We just want to share our recent experience with the above:

Recently, we have dismissed a staff who had so many incidents of "ill-treating" children. Even after a few warnings, this staff still did not improve. The last incident was that she locked a child behind the gate. After finding out the incident, we dismissed her straight away while at the same time, we reported the incident to the police, the Child Protection Unit and the regulatory body. As expected, the regulatory body came to discuss the incident with us. But the result is that they would not carry out any disciplinary action against this staff, instead they said that we, the service provider was the one that violated the legislation.

Fair enough that the regulatory body needs to hold the service provider responsible for things like practices, policies and procedures, but why should the service be responsible for the personality and the conduct of an individual if we have already warned this staff on a number of occasions about her inappropriate behaviour. We told the regulatory body that we have dismissed this staff, but to them, it seems that it is still not enough. They still sent us a letter saying that we did not comply with the legislation. We really don't know what they expect. . There were parents' and staff complaints to support what we said, but the regulatory body said the whole situation was still not confirmed.

Our understanding is that because the regulatory could not take legal action against the individual, so they changed their target to the service, disregard whether the service is doing or trying to do the right thing or not. It seems that it would help them to meet their KPI if more services can be classified as "non-complying".

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### 12. Received 7/11/2013

I have just read this article and couldn't agree more about points 1 and 2.

Individual area ratings could be beneficial and say more to prospective parents than one overall phrase. Our educators have worked like slaves to upgrade their qualifications and get their heads around the new expectations. To be rewarded with "Working Towards" as an overall rating sends the message to the uninitiated that they have "only just got out of bed to start the day" rather than burning the candle at both ends for the last two years. It does read like a downgrading.

As an alternative, "within normal range" or "above normal range" or "below normal range" continues the language of the Bell curve which is widely used in ranking educational achievements.

There is an air of salesmanship about "selling" our centres to the assessors. There is also an air of fear if we have to fight for our rating by being super-articulate communications whizz kids. We are not in advertising, but maybe with time, as we become more sure of what we are doing, we will become more confident communicators and so this is not a bad thing!

Underlying all of this perhaps is the need for all assessors to be chosen for their ability to enjoy people and relate positively to centre educators rather than walking in ready to find fault. They definitely need to be up to date in their knowledge.

I think assessment by peers could become a bit "cosy."

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### 13. Received 11/11/2013

Thank you for all the great information you continually provide!! I use your resources on a regular basis & appreciate the information.

We are a centre that hasn't had their assessment yet, but I have heard from a few centres here on the northern beaches that assessment has been hard, & where they felt they were doing a great job, they got marked as "Working Towards". I totally agree with your whole article, even some of the courses I



have attended through Networks, the facilitators have mentioned that some assessors don't have the qualifications or recent knowledge/experience. I think this makes it really tough on us! And I also identify with what happens if one thing "goes wrong" on the day of assessment, but the other 364 days you doing it well? It's harsh, & I reckon they should be spending more time within the service, getting to familiarise themselves with the centres continuous practises, rather than just judge them from a few minutes observation.

I know that our team has been working extremely hard towards a positive outcome & we will be devastated if we get "marked down" due to nervousness or something "silly" on the day. I think this is a great forum to give them some constructive feedback, so they can also improve **ALONGSIDE** the services!!

Thank you Centre Support! You guys are doing an **AWESOME** job!!

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#### 14. Received 15/11/2013

Dear Centre Support,

I would like to offer a different perspective from a 25 year career as a service provider, nominated supervisor and early childhood teacher.

Since the next rating up is 'meeting NQF', then perhaps 'Working Towards' should actually be 'not meeting', perhaps as you suggest in those areas which do not meet the NQS requirements.

Quality services that are meeting or exceeding NQF do not want their achievements undervalued by vague feel good statements that skirt around the real message.

The Regulations are minimum standards. All Providers have had two years to prepare for the NQF, which builds on the Accreditation Standards of the past 10+ years.

Failure to meet the standards is rightly a reflection on the resources the Provider has invested in meeting Regulations, rather than being the primary responsibility of Educators and Nominated Supervisors.

Working Towards is clearly NOT intended to sound like a service should be shut. 'Not Meeting' would sound like a service could be shut. If I may provide a similar example in school education. Years of avoiding to tell children and their parents that their school results are inadequate (e.g. they failed a subject) has been proven to result in reduced effort from students and confusion for parents. We do not need the same to happen in our sector.

Finally, I think it is more important to look at the poor results across the country rather than try to justify or excuse those results. Our sector has not done very well, lets face it. There are far too many services not meeting the standards. Parents looking at these results can not feel very confident in our professionalism as an industry. I agree that in some respects, the requirements of the NQF go well beyond what parents and children need and want. However, whilst we have this system in place, the obligation of Providers is to meet the standards as a condition of doing business. The 'Working Towards' rating gives services that are below par an opportunity to get it right without a 'fail' mark.

Thank you for the opportunity to offer these suggestions and observations. I hope they are communicated openly to stimulate diverse discussion.

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#### 15. Received 16/11/2013

Some thoughts:

1) Sustainability has gone way out of control. Expecting every centre to have a compost bin is ridiculous there are other ways the children can learn about sustainability.

2) The need for natural elements - stones, bark, hay, sand, fresh flowers etc to be in every room - yes, I was marked down on one centre because it was not in every room!



3) Washing hands before and after play dough , sand pit etc. Obviously we all wash children's hands when they are dirty which is often after play dough, but given we have to throw each child's play dough away after they have used it seems ridiculous in terms of washing their hands before.

4) The need to have ECT's in centres where there is no pre-school. I appreciate in the ideal world it would be to have ECT's everywhere but it is hard to employ an ECT to work with under 3's.

5) The change in the 2-3yr ratio's is a huge change and one which we are having trouble financially factoring in what with all of the other changes. Most centres will either have to drop child places and still charge extra to cope with the loss of revenue, or hire an additional staff member and charge extra for the additional salary. A 1 in 8 ratio works fine, but maybe a 1 in 7 or 1 in 6 is more achievable by 2016.

6) The need to have 50% diploma trained. This is hard as some staff are fantastic, and a bit like the ECT they may not be capable of completing the paperwork, not because of ability of knowledge but purely in terms of their written skills. Plus we are finding that the courses are having trouble keeping up with the changes and a few of our Diploma trainees are having to complete units twice as the course work is changing. The government need to allow the industry including the training companies more time to ensure the courses are ready.

7) Programming and evaluation/reflection. What are they requiring? On both occasions that I have had a visit the evaluators cannot get their heads around the Centre support sheets which are so extensive. We have had to draw charts to demonstrate the process and they are still overawed by it however this is not necessary a good thing as they stumble when trying to write about it in their reports. Maybe as an aside, Matthew should focus a bit on how we explain this to evaluators. In any case the problem lies within one centre they felt there was not enough reflection so I even added 2 more sheets for the staff to complete over and above your paperwork. A daily reflection and an individual experience critical evaluation. It's too much and ridiculous if they feel this is not sufficient.

8) I think the entire problem with all of this is the inconsistency across evaluators personal ways of perceiving what we are doing.

9) The need to have everything visible on the day is outrageous. In one of my centres it was raining hard and I was marked down as there was no outdoor play occurring despite photographic evidence from the day before. There needs to be a margin between the actual day and say 14 days of photographic evidence weather permitting.

10) Additional needs - in one of our centres we were marked as 'meeting the standards' and highly praised because our processes and procedures, community links, resources, knowledge etc was fantastic and broad, however yet because we didn't have an additional child currently enrolled we did not receive 'exceeding'. This is an utter nonsense.

I'll add to this as my staff suggest further issues.

*[continued...]*

1) I totally agree that the wording of 'Working Towards' is demoralising considering so many centres are getting them. Another coding system would be better takes the 'emotion' out of it.

2) One problem I may be facing is the entire process of how the centres are evaluated. One of my centres was 'Working Towards', marked by the regional manager during the first week of assessments occurring, several arguments with the other evaluator and the entire process was daft. Admittedly I was unprepared for the change in the process and this time round in my other centre I was all singing and dancing and in control of the assessor. Yet, the first thing they started to talk about was our mark in the other centre. On a few occasions the other centre was discussed and whilst the evaluator was quite frankly blown away by the centre currently being graded they kept making reference to the other - i.e. I feel without them saying it that they were hinting that as the other centre was Working Towards I wouldn't be given an 'excellent' rating because of this. I pointed out in writing my concerns and how this would be unethical, but I will see. I certainly will not be asking any further of my staff in terms of paperwork, care and attention regardless of their rating. But it is WRONG. The assessor said it was not



her final say and that her report would be passed over to 2 other people in a chain for the final mark - so someone who has not been to the centre will grade us - it's ridiculous! Their report is again down to interpretation. This current assessor is working closely with us and including verbiage we are writing to her in the report as she does not want to get it wrong and really feels we should get the excellent rating.

But now in this current system I won't be holding my breath, again it's just not right. So in short the assessor who comes to the centre should be the person providing the rating, and only if a centre wishes to question the rating should another person be involved - and they should have to visit the centre.

3) Why should we have to pay for Excellent. So wrong!

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### 16. Received 27/11/2013

I'd also like to add that Trainees make a very important contribution to Children's Services personnel. Under the current NQS, services who employ Trainees as primary contact staff will be rated as 'Working Towards' In Quality Area 4 which has led to many employers choosing not to recruit trainees.

I have many employees achieve their qualifications through work based traineeships and I often find these staff perform better and long term than staff who have had only face to face training. I believe that we need to remove the requirement that all primary contact staff have a minimum certificate 3 in Children's Services in order to be recognised as meeting National Quality Standard.

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### 17. Received 28/11/2013

I am the Director of [an] OSHC & Vacation Care... I am writing to express some concerns regarding the NQF. The service I am the Director is one of the larger ones in Adelaide and we have a maximum of 135 students per night in our After School Care timeslot and a maximum of 75 students for Before School Care. We average 120 children per night and 60 for the morning on site as we provide care [for two schools].

My concern is in regards with taking observations of children. Due to our size I believe that this does not work for our service as I require my staff to be focusing on providing high quality care in the area that they will be working in on each night. I can't have my staff writing down observations while they are required to be caring for children and engaging them in their interests and activities.

We are linking and programming in a way that works for a service our size and not creating a portfolio for each individual child. It does state in the Educators My Time, Our Place CD PDF #9 Developing Portfolios for Children, 'Portfolios are NOT a requirement for school age care services'. I have spoken with many services and they have all been panicked that this is a requirement to achieve a competency.

The second concern I have are the words "Working Towards". I believe this does say to parents and families in the community that a service may not be adequate in providing the highest quality care that they are capable of. A service may not receive Meeting or Exceeding National Quality Standard due to a paper trail. It may happen within the service but we can easily be time poor in having the opportunity to complete all the required paper work that is required to achieve these standards.

There also seems to be a lack of consideration with service size in the competencies to be achieved. I believe a service that may only cater for up to 30 children will have a better opportunity to achieve the objectives as they have less children and families to have to cater for.

I do hope that this information is taken into consideration with moving forward with the NQF and in the reviewing process. I do believe there needs to be a measure for services, however I believe people are forgetting that these children have been in a school structure environment for a period of 6 hours and don't have the opportunity to go home like other students due to parent working conditions. Therefore care that is provided in an out of school care timeslot should be geared more to being an extension of their home. They need to be able to have some down time and be in a safe social environment. Yes there needs to be regulations to ensure the highest quality care is provided for children utilising the service but there also needs to be a degree of free choice.





If it continues the way it is going, more along the lines of long day care, will families that don't require OSHC be missing out on their child receiving individual programmed activities to further an interest or skill?

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### 18. Received 28/11/2013

A suggestion I would like to make instead of the term "Working Towards" is to say "Actively achieving".

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### 19. Received 5/12/2013

New Zealand compared to Australia

#### Governing Body

In New Zealand it is kept very simple. The Ministry of Education governs the early childhood sector. It has a simple to use website which goes in to detail on every aspect on the early childhood education. From what is considered an early childhood education service, the legislation, regulations and criteria and how a service gets licensed.

In Australia it can be very confusing. It is hard to find who governs the early childhood sector for any particular area and when a teacher needs assistance which I often have they are passed to another governing body. DEC's tells them to contact DEEWR, who tells them to contact ACECQA, who tells them to contact ministry of education who tells them to contact DEC's. I women at DEC's told me she did not know who ACECQA was, I had to explain who they were and there role in early childhood.

#### Regulations

All staff in New Zealand are aware of the regulations and abide by them. They are clear cut and the same across the board. All centres have the same rules and regulations so one teacher can work in any centre in New Zealand and know the regulations.

In Australia few teachers know the regulations. They are constantly changing and teachers make up their own policies and rules. Regulations often come in that make no sense to a teacher and make her life difficult in the classroom. There is constant red tape that prevents teachers from teaching in a way they would enjoy. Once a teacher feels they know a regulation it is changed. Centres are assessed and told they need to change areas but these areas have nothing to do with regulations. They may be just be the assessors personal thoughts or beliefs. This causes burn out in teachers as they constantly feel in the wrong and that they can not keep up.

#### Curriculum

Teachers get confused between the Regulations, Law, National Quality Framework, National Quality Standards, the Early Years Learning Framework with it principles and all of its numbered elements and the list goes on.

The EYLF is a great step for Australia's early education system. But since most teachers are only studying cert III they know nothing about it or how to implement it. EYLF is a philosophy and should be incorporated in to everything a teacher does. Most teachers find it a hindrance and extra paper work. It can be confusing and most teachers find it hard to link the principles to practice. It is written in a confusing way and teachers find it hard to link the elements to actual experiences. It also does not cover all areas of learning. Teachers often do experiences and find they can not find an element that links to the particular learning outcome.

There are so many different EYLF resources to help you learn how to use the EYLF. To put it in to practice, to use it with families, to use it for reflection. If the EYLF it self was a simple to use document that covered all aspects of early childhood education we would not need all of these resources of how to use it and how to incorporate it in to other areas.

Te Whariki, New Zealand's early childhood curriculum is easy to understand and is the basis of how New Zealand teachers teach. It is a basic teaching philosophy that covers every aspect of quality early childhood education. It is where we get our guiding principles from.

It has four principles:

Empowerment.





Holistic development.  
Family and community.  
Relationships.

And five learning areas.

**Mana atua** wellbeing

**Mana tangata** contribution

**Mana whenua** belonging

**Mana reo** communication

**Mana aotūroa** exploration.

New Zealand teachers incorporate this curriculum in to everything they do. There is the one resource that is the guide.

### Qualifications

This is where Australia really falls short in early childhood education. Most advanced countries (and research) in the world consider early childhood to be the most important part of childhood development and expect a teacher in this field to hold at least a three year qualification. Yet Australia allows teachers to work with no qualification at all. Teachers now are expected to go in to training to gain a Cert III which takes around 6 months. Many teachers go in to the job because they have no other skills not because they love children or education. It is a low paying job with a high turn over rate. They are not even called teachers, they are called childcare workers. Teachers who do hold a degree are often the only teacher in the centre with a degree as that is the minimum requirement a centre needs to operate. They often work with unqualified staff who have no have no passion for teaching or love for children and are only there because it is the only job they could get. It is demoralising for qualified teachers and causes high burn out rates.

In New Zealand you need a minimum three year qualification to become an early childhood teacher. It is a well regarded job and teachers do it for the love of education and children, otherwise they would take on the commitment of obtaining the qualification. It is a reasonably well paying job and the Ministry of Education offers incentives and advice on how to start up your own preschool as opposed to the big business corporate owned centres that are popping up all over Australia.

### 20. Received 29/11/2013

- Did not fund the reforms adequately
- Training only certain RTOs and substandard qualified trainers ... Should be a min 4 year Ect plus cert 4 Ect postcodes discriminatory Training quals are now not the preferred 0-8 not the 0-5 trained for Coats time and stress for ungrading quals 11k borne by educator and award is lower once complete in comparison to diploma
- Psc are funded but there is not benefit to the services\_ thier resources are an additional cost as is their training and is ineffective If the cost was divided between each centre say in nsw what would be the cost versus benefit what \$1000 for what Eca implementation training was not sufficient and most were unable to attend as they were booked out
- Assessors are not trained or have the pedagogical current knowledge to acknowledge and assess area one Their compliance background is confusing the Nqs as they are looking for specific things which then become unspoken laws. Eg bottles and time to challenge T
- here is too much subjectivity and bias whether intentional or inintential depending. This may be due to past experiences with ec good and bad or their bias toward private or community based operations The assessors should not be assessing in the region they have previous worked and need to be replaced with competent assessors who are trained in auditing standards and at least hold a current 4 year qualification in ECEC for assessing area one.
- 4 year Ect are needed in centres to enact the complex framework to mentor and embed 21 at century care and education into ECEC . Their understandings are critical to ECEC relationships and the potable of attachment/ relationships in the early years for the social benefit in the future.
- ECEC need professional development by experts not pretend experts such as reputable RTOs, universities or lecturers from universities as a requirement to stop the historical culture of ec not grasping current theories teaching and learning otherwise we will continue to jot move forward and the social investment will be wasted.



- The overall rating should either be removed or be either accredited or not accredited .
  - The ratings for the specific area are something that we can work toward but need to be renamed as the media sees working toward as a fail..... Perhaps a graph ...
  - I don't believe that assessors understand the nqs or eylf and lack industry experience causing unrealistic expectations on services and educators in proving they meet or exceed the elements Ect versus diploma relief Same regs for all Parents don't look at R&A - laughed aby Additional needs - parents don't want to know and reject us as knowing ... Funding is difficult to obtain and resources and qualified educators are scare which puts huge stress on resources to intergrate these chn Costs Flexibility
- 



In June 2012, six months into the implementation of the NQF, Centre Support had received feedback from clients throughout Australia regarding experiences with their applicable regulatory authorities since the inception of the NQF. All personal details have been withheld to protect services from the fear of retribution from the Regulatory Authorities.

21.

I just received a resume from a girl who is studying a Bachelor of Early Childhood at the University of the Sunshine Coast. Her most recent results are her Year 12 results and it lists her as achieving an OP of 16! I share all of the concerns that fellow directors etc. have about forcing experienced staff members out in favour of Bachelor trained inexperienced teachers using childcare as a stepping stone to a comfortable job in schools. I cannot understand how we can afford to drop the bar so low as to be letting OP 16's into a Bachelor of teaching and expect that outcomes for children will be improved. This child has clearly just passed Yr 12 and if she can manage to scrape through passing at university we will unleash her into Childcare centres to be an authority in education over and above the women who have worked there for many many years with a lifetime of experience.

Either we need to say that we want intelligent and qualified people providing educational leadership in front of our young children – in which case we must place a higher value on a Bachelor Degree than an OP 16, and take steps to ensure that those people going into these courses aren't able to use Child care as a stepping stone to teaching in Primary schools.

OR

We recognise the value of experience over what seems to be a fairly meaningless piece of paper (it seems that almost anyone can study a Bachelor of Early Childhood).

22.

This is my 35th year in child care as an Early Childhood trained teacher. I have been an employee at a large centre a part owner of a large centre and now an owner of the most wonderful 29 place centre (Remember this is my story !). All the time I have considered myself , by reference, as a teacher, child care worker, a mentor, a friend, family support and more of late our new title , educator. The admin/management is in the background. The inroom and family connection is what I do best and get up everyday to go to and enjoy. I have four families at the centre who it only seems like yesterday, the parents were in my care and experiencing what I could teach and provide for them. A wonderful compliment when they send their children to the carer from their time! I have staffed the centre with two primary care Diplomas and one Primary teacher in training to support our transisiton to school program, as well as a diploma trained who is in the kitchen as our Food and Nutrition Manager, plus our untrained but many years experienced assistant, with myself as program consultant, gardener, purchaser of wonderful equipment and resources, piano player and general dogs body. This over abundance of staff numbers and qualifications is to provide excellence for the children, to ensure our motto "Pro Parvis Optima" for the littlest the best is fulfilled. It also allows me the luxury of winding down, allegedly, as my family needs grow the need to support them as a grandparent, BUT

.... unfortunatly for the first time in my career (which I thought would go on forever) I have had thoughts about the big "R " retirement.

The 2014 changes to the regs will require me to either:

- \* reduce the centres licenenced number to 24 chn and be here part of the time (whatever that is !)
- \* stay at 29 chn and work full days, full week.

The latter isnt an option as I engage in the mountain of administrative requirements of the centre which are getting more and more paperbased each day and to be òn the floor" seems an impossible task.

I have a much loved quote I use whenever I get dispondent about the direction of childcare, the NQF and "new ideas" from some advisor in an office in the concrete jungle of the public service.

"WE ARE SPENDING SO MUCH TIME WEIGHING THE PIG WE OFTEN FORGET TO FEED IT"

This applies to admin, education, staff training and more. I beileve this quote encapsulates the feelings of MOST face to face educators, the workers, the carers, the people who are "child care" The frustration of



having to record, document, store keep, reference, copy blah ! blah ! blah ! has to take away from the quality time spent engaging meaningfully not box ticking, with the children

To return to the options, ie reduce our numbers I would ask the regulatory body to come and tell me which of my long serving, hardworking, loyal and committed staff are going to get the flick OR are the fees going to skyrocket to allow me the luxury of the additional staff I have now ?...I think families will decide on the answer to that question..dont you ! Also which of the families that have the second, third or fourth child enrolled will not have a place as we will be only taking 24 chn with no two year olds ?

My untrained assistant, who like me comes to the centre everyday to provide quality care is very nervous about her future. She barely made it through her formal education not an academic, but her skills are based on hard work, committment to inhouse learning and the development of skills by being mentored by other educators and more importantly the love of the children and her role at the centre. She is our rock and a warm and wonderful part of our team. What will happen to her...no she will not do her Cert III, she will probably leave the industry and I will have replace her, sadly with an inexperienced worker who will have many years of work ahead of her to match the common sense, sensibility and knowledge we will miss from KG.

I would like to keep operating the centre for as long as my health will allow, to keep seeing children resurfacing as parents, being part of our community and the community seeing us as a part of its being. I dont want to have to be a bit player or a full time player becasue some system has dictated it. I had hoped it would be a gentle transition where the best for the centre would be developed gradually meeting all stakeholders needs. But it seems coming into Jan 2014 I will need to make the biggest decision of my professional life and I hope it doesnt include taking from our community a 23 year old institution,a much respected home of early childhood education.

With apologies for my emotional ramblings driven by the passion I have for this amazing profession and all it offers.

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### 23.

Basically our main complaint of which i'm sure you have heard many times is the overload of pointless paperwork.

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### 24.

I have a couple of points

1. Funding for children with additional needs should go with the child. It should be fund the child not the centre. We currently have 2 autistic children come to our centre that had funding from the other centre and now we have to reapply and KU are 2 months behind processing applications. We have been given flexible funding but this will run out before funding becomes available and the flexible is limited hours!

2. Like everyone else. Staff are extremely stressed!!!! We have not had enough time to get familiar with and work through the NQS. Time for QIP should be extended. Government should be there supporting centres and giving them more time!

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### 25.

My concerns are:

1. The difficulty in recruiting EC teachers. Most EC qualified teachers end up teaching in the school system. An Early Childhood Degree should be specific to teaching 0-5 years – I believe this would result in teachers who are much more qualified to teach in an early childhood setting. Many of the EC teachers coming out of University at the moment are not skilled or experienced enough as the degree is 'diluted' to encompass the primary school elements.

2. The different awards for EC teachers and Children's Services Employees – especially regarding paid/unpaid lunch break allowances. This causes disparity and discontent amongst employees.



3. The disparity in the number of EC teachers required in different States. Why is NSW disadvantaged over this? Why are the regulations called 'National Regulations' when this disparity is present?

5. The funding for support workers to help children with additional needs not being enough to cover the award wage.

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26.

Some of the concerns for our centre are:

\* Having to increase fees to cover costs.

This is not just to do with the change of ratios but also the increasing costs of food, nappies and general everyday supplies. We were going okay with that but now with superannuation and possibly wages also being increased, this is when it's going to get really tough. Parents don't always understand this and think the increase is just a money spinner for the owner.

\* Families entitled to CCB/CCR.

Most of our families are dual income families so do not get CCB or Tax Benefit with FAO. Thankfully they do get CCR, but wouldn't it make more sense to give the help to working parents so it is more worthwhile for them to work? Gee it may just improve the unemployment rate too.

\* Regs with grey areas.

Some of the regs are not really clear and leave us wondering if we are really doing the right thing or not. Some of the changes are confusing and/or do not seem to be best practice.

\* ECT's

It is very frustrating that services have so much trouble getting ECT's when there are diploma trained educators who are just as good if not better than any ECT's we have ever had. We need 2 ECT's but why would we put off perfectly good Diplomas (who are studying their ECT) to employ an ECT who may not be any good. With interim ECT's we will then be marked down when our centre is reviewed. If the children are still receiving high quality care and are being educated, isn't this what's important? Surely there are other services in the same position.

There is probably more but these are the main things I can think of off the top of my head.

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27.

Thanks so much for the update. It was nice to read from the point of view of not feeling alone. I feel overwhelmed and exhausted as I am trying to complete Uni, update policy, formulate QIP, run a business etc. etc. I agree there are some great quality outcomes to be seen out of all the changes however was there any positive feedback at all about relaxing the timeframe?

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28.

Further to your email of the NQF impact on child care.

I have a friend who runs a nanny service, 5 staff, no regulations. Tony Abbott is about to provide CCR which will, undoubtedly grow this fledgling industry (no regs).

The second area which is preventing the unsatisfied demand being met, is the local council regulations where a third of the area is carpark! This makes land use inefficient and prevents new centres being constructed.

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29.

My issue would have been the fact that families can accrue debt at the service but still get a 50% lump sum as there is no regulating body to report this non-payment debt to, therefore families are making a profit from the government and centres are running debts!

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30.

My biggest concern is the ongoing financial burden to parents with the increase in staff child ratios and the ongoing wage and super increases over the next few years. As a service provider we strive to provide a high quality of care to our children but financially it is a struggle.

We do not need more centres to open in our area we need financial support to better improve facilities and to assist with staff skill upgrades and in-services. If these areas were addressed you would find that (5 centres I have contacted) centres would not be running at 50% we would be full! Yes there is a need for childcare places in the inner suburbs but it is certainly not the case in the outer most suburbs of Melbourne's East and South East. ie Pakenham, Berwick, Narre Warren, Cockatoo, Emerald and Narre Warren East & North.

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31.

Our biggest concerns was the time constraint we are experiencing to prepare for the NQF Assessment.

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32.

How are Teachers, Nominated Supervisors and Educators supposed to actually do their daily work of programming, teaching, evaluating, preparing portfolios, organising Parent Teacher evenings, cleaning, serving meals, attending to supervision requirements, managing to squeeze in staff meetings and liaising with parents when all we have time to do this year is fill in countless unnecessary compliance forms for the governments' central mega department....ACECQA

In 15 years in this industry I have never experienced so much stress and anxiety as a kindergarten manager and Nominated Supervisor. I used to be Deputy Principal in both the public and private systems before entering Early Childhood in the 1990's in a schools of 400-1200 children. We have 36 children per day here on the leafy North Shore with 65 families per week and this is sooo much more difficult because our professionalism is disregarded and undermined by too much ridiculous red tape and we can't get on with our real jobs of mentoring and a managing staff, supervising and teaching children, answering the phone, dealing with enrolment enquiries let alone having the financials ready for the accountant!

Perhaps Kate Ellis and Peter Garret would like to come in and do the housekeeping jobs and the office work while we as a staff discuss our next area for improvement and discuss the pressing matters for children's health and wellbeing which are now having to be scribbled in a Communication Book because noone has time to TALK anymore!!!!

There are unrealistic time frames for the QIP, financially unviable imposts on extended hours preschools such as ours with 36 children per day that in NSW require an ECT at all times!!! For heavens sake where is the personnel and money coming from to pay an ECT for 50 hours a week??? Completely unnecessary to have ECT for more that 6-7 hours per day. In primary schools the children have only 4 hours 10 minutes direct access to their teacher! So with that wage bill alone centres will be unable to FIND the extra staff needed as university degrees are currently too broad with Early Childhood encompassing 0-12yrs and therefore teachers will not work in early childhood which often operates for 48-50 weeks per annum when they can work for shorter hours, longer holidays and take home more money.

That NSW has imposed additional regulations on us as far as staffing is also outrageously expensive and unnecessary.

The financial fines for non- compliance are making teachers and directors who have been in the industry for year resign en masse.

When the government insists that we become sustainable in our day to day practices yet requires 20 pages of information to "register" every worker in your centre @ \$30 per person ON PAPER, you do become cynical at their own commitment to the environment No electronic option, asking for personal data which would be held by the employer...overkill.



The amount of paperwork required to run your centre now has quadrupled between reflecting on every aspect of the day, your class, your conversations, your practice, your relationships with parents and other staff.... Don't know when you are supposed to sleep and eat let alone look after your own family!

This level of reporting and reflecting is completely unsustainable and staff will burn out and leave the sector exacerbating an already under resourced employment pool.

We are stressed, we are cranky and sick of not being treated as professionals who can manage to create wonderful learning environments and optimum outcomes for our children without the fear of Big Brother hovering over us.

### 33.

Our biggest concern is that families who have outstanding fees are still being paid their 50% rebate there should be a system in place where each quarter this is paid to families only if their fees are up to date and for those who Community Services pays they still receive theirs too this should be paid back to the government to help children not paid to foster carers or grandparents who haven't paid in the first place if they have paid then yes pay them if not the funds could be put to better use.

### 34.

Our concerns are

- Costs – staff/children/administration/resources
  - With the new ratios we struggle in the morning and in the afternoon. We are open from 6:30 to 6pm and therefore have difficulty with staff. We are finding that children are staying longer and that the age of children attending care is getting younger. We now find that we always have children under the age of 15 months and now the ratio is down from 1:7 to 1:4 which requires an additional staff member on duty early in the morning and late in the afternoon. Then to make things more difficult our additional educator now has to be a qualified educator where as it could have been an unqualified educator under the old regs.
  - We have been transitioning to this new format for a year and a half and yet our staff are still requesting more planning/noncontact time for the paperwork. We feel that this will improve however this is an additional cost in the mean time.
  - The cost of the Kindergarten teacher continues to be an issue. We have had to pay our teacher well above the award wage to secure her contract.
  - The superannuation contribution is set to go up – from 9% to 12% - just another expense that we as a small business is forced to pay.

We find it difficult to secure staff on a full time basis – very few staff are wanting to work full time – they want part time and flexible hours. They get paid good money to stay at home. Staff with children tell us over and over that it does not make financial sense to work full time as there is not much difference at the end of the week as they get more benefits from centrelink by just doing their 15 hours a week ie. Health care card ect. Then the younger staff tell us that they would happily to take the \$100 less that they would get from centrelink and not be working then at work.

Parents come in on a weekly basis and tell us that after childcare, travelling expenses etc. it is not worth them going back to work. If they went back to work then the CCB would drop also and therefore the increased income they would get from working would be taken away in the increased cost of childcare. It is my opinion that the government is helping to foster or 'non working' culture. They are trying to 'encourage' everyone especially mothers back into the workforce however we are punishing them and not making it financially viable to do so. The Kindergarten funding is one that astounds us the most. Non working families get the health care card and then they get the health care card rebate – making their 3 days in kindy free! So families where mum and dad do not work have their children in long day care from what could be 6:30 to 6pm (usually these children are coming from 8:30 – 5pm) for free and yet another family with both parents working are pay \$207.86 in out of pocket expenses for their sons Kindergarten program. When they are only on the min wage this is a large weekly expense. – Especially after taking into account that by going back to work they lost their health care card, they have travelling costs, uniform costs and they are away from their children. This does not make sense to us within the industry!



We agree that it is important for every child to have a strong quality early childhood education and it should be available and affordable for all children and families – All we are saying is that the government should not be penalising those that are going back to work.

(noting that we are offer the lowest fees in our region)

So it is my suggestion that any additional funding this year be paid to childcare businesses directly and not in increasing the centrelink/family payments. That way all families will benefit. I feel that a full review should be undertaken on the cost especially looking at the middle to low WORKING families. A non working family (one or both parents are not working) can have their children in our centre up to 3 days and pay virtually nothing (\$18 for the week). Then we have other families work are both working and are struggling to make ends meet.

We had a staff member who works 4 days per week who was wanting more hours and willing to work, we gave her more work and she then went an updated her estimate with centrelink and her out of pocket childcare expenses for 4 days went from \$75.66 per week to \$169.97. This outweighed the increase wages for doing the additional hours.

This also effects centre obtaining and securing quality educators. We aim to have stability within our centre and for the children – the best way to achieve this is to have full time staff. We need support in making this a viable option for Educators.

(noting that we are offer the lowest fees in our region and these are half that of fees within major cities) our daily rate is only \$53

I also feel that further work needs to be undertaking in changing the image of childcare. I am in favour of it moving from a tafe based training to university. There is much more to be done. This should have been started earlier. We seem to always be chasing our tails in the industry. The regulations change and then we chase our trail to try to make it work and make what we are doing fit. We found that the Tafe – who are training our educators had a very limited knowledge of the new regulations. At the start of this year our Tafe teachers where still unsure of how the studies were going to meet the regulations. So we are teaching the OLD way. The certificate III in early services was not changed prior to the new regs implementation.

Our local office of early childhood education and care – who implement and monitor the regulations did not know what was happening. We were talking to them daily at the start of the year and they were informing us of something new each day and telling us that they had been telling us the wrong information. It was a mess. Thankfully this has improved however I just want to stress that the implementation needs to be reviewed. We have to learn from this process to ensure it doesn't happen next time or in other industries transitioning through change.

### 35.

Our concerns are:

- Rising costs under new ratio and qualification requirements with CCB not keeping pace – I don't know where the government got their figures from but if you just look at the 3-5 years age group which was a ratio of 1:12 which will be 1:11. Based on 24 children per day at \$70 per day. Drop that to 22 children and your fees raise to \$76 per day without considering qualification increases. I do my figures by revenue so  $24 \times \$70 = \$1680$  for the room for the day. Spread across 22 children = \$76 for each child to pay per day.
- Wages increasing and fees cannot keep pace. Whilst I support a higher qualification base, we are not able to increase our fees to keep pace with increase in wages. I am one of the most expensive in town having increased my fees by \$5 per day each year for the past 3 years however I cannot keep hitting families with such rises as they simply cannot afford it.
- Shortage of early childhood teachers !! (enough said!)
- Shortage of qualified educators – I have 2 centres one in Rockhampton, Central Queensland and the other Gracemere (10 minutes outside of Rocky) and we have at least one permanent vacancy at all times which we cannot fill. No point in advertising as you get no response!



- NQF/NQS – concerns as to the change of mindset that needs to occur for Educators many of whom are new to the industry and have no idea. We have been working through the draft documents since last year however I believe the educators do not completely understand requirements. There is not enough time in the day to do all of this!

## 36.

! Over the last 6 months I can hear the stress from all of us. Trying to implement all the changes without any REAL help. Our staff all have different levels of qualifications, life experiences and work experiences. We have different management who also have differences and often this management changes from year to year. I know of 4 Directors on stress leave because of community management. Our 7 Newcastle centres have had to become politicians and battle the council. We sometimes get management support, but they are volunteers and have their life too. Whilst everyone understands the need to move and change- we are having too much in a small space of time. I am employing people to be with the children so that the regular staff can complete paperwork. Quality Care Ha! We all want to be High Quality with Accreditation but at what cost. I, on a personal note, have spent the last 4 weeks coping with being reported to DOCS because a child was bitten at my centre. I had 2 DOCS people out on Friday to investigate. In the internal investigation by committee we have had to meet, review policies and write reports. My president has had to become a lawyer and quote the constitution! (She was wonderful too!) My staff are running scared and look to me for strength and leadership but TLC. So in short since Jan 2012, I have started the QIP, introduced EYLF, made changes because of NSF, fought Newcastle Council and become the media legend of Newcastle, reviewed Philosophy and Policies and work with a disgruntled parent. Guess what – I'm leaving, yes really, I've had it.

## 37.

My concern for my centre is time to complete the QIP properly. At ground zero, there is a lot of work to be done in the time frame allocated and the cost of putting on extra staff.

## 38.

1. Just in the last month we lost 4 children that have been with us for the last 3 years to be looked after by relatives because of the high cost of care. The parents are employed and they said due to high cost of leaving they cannot afford the child care. They explained they now pay about \$75 to a relative or neighbour to look after the children. Therefore the children have been removed from regulated care to unregulated care. This is a new trend of working parent that is increasingly happening.
2. We have parents leaving a long day care to use family day care because at the family day care they are not paying any gap fees as they signed up for longer hours instead of paying gap fees.
3. Local councils offering free kindergarten for low income parents or minimum fees for others, parents are using council kindergarten for free instead the kindergarten in the centre. Therefore the need for kindergarten in the long day care is becoming useless in the low economic area like Hume.
4. Staff requesting more than 4 hours programming time due to the demand of so much documentation from the regulatory authority. This is creating extra pressure to the centre as the need for more relievers to cover program times. The Directors work pressure to meet the regulation requirement is forcing centres to employ a secretary to make time available to do the regulatory work. The requirement of the new regulatory body is becoming way beyond reach in day to day operations.
5. Staffs are spending too much time documenting while they are working with children in the room eg. excessive observation to satisfy the new NQS. This has resulted in staff spending less time interacting with children.





6. All the above are creating financial stress to the operation of the centre which might result in closing down operations, with will effect parents and staff employment.

### 39.

Concerns for our centre are:

We are unique - only 14 places, 2 carers (1 Educator, 1 Assistant Educator). We are even more unique in that I only took over the centre in December and I don't have any childcare experience or qualifications, I am currently studying my Cert III.

- Certified Supervisor requirements are causing us problems. For example we have an employee who has done 2 years of Bachelor Early Education who has had to go back and do Cert III. In order for her to be a Certified Supervisor she would now have to go and do the Diploma as well. She hasn't been in the industry for 3 years. It seems crazy that I can't promote loyal employees. They have higher qualifications but have to go backwards.....????

- Wages. There is a lot of talk at the moment about wages. Main concern is if the Award rate is increased, who will pay for it?

They are probably the main concerns we have at the moment. Otherwise we are really enjoying working through the Quality Areas, it is re-invigorating the staff and generating a sense of fun.

### 40.

- Low enrolments and significant cash flow problems
- Unknown with the new assessment procedure & NQS
- Concerns for future of the business with staff to child ratios for toddlers and requirement of qualified staff. Another family is leaving our service in 2 weeks for the pre-school as it is cheaper for them
- I have a full time staff member leaving to have a baby. I have one person who will job share, and am finding it difficult to find women who will work. All the applicants are mothers who have stipulations of what days they can work etc.
- The local community pre school received govt funding for over \$350,000 last year. As a private service we are entitled to nothing, which is unfair because like many services we run on the smell of an oily rag and are providing a service to the community.

### 41.

Some general points that I am sure you are already aware of for the entire child care industry: Pay rates especially to encourage more men to be part of child care sector. Also now with the new regs coming in that all staff have to be a minimum Cert III rates should be going up as more and more educators are gaining higher qualifications.

Less focus on paperwork, more focus on spending time with the children as educators (I know in theory the new EYLF should be encouraging this but educators are just finding they are always taking time to document things and feel as if their time with the children is not as much). These children are young and dependant on adults to be able to focus on them and constantly give them attention as if they were at home, as a new parent I see this is not what happens in the child care setting.

More funding or grants to allow for additional training and PD for educators throughout the year. Good quality training on specific areas such as child abuse, dealing with difficult behaviours, creating exciting play spaces etc. All things that will assist a Service in providing excellent care.

Less paperwork for management so they have more time to ensure services are running well and have time to spend with educators when they need assistance in areas of training etc. More opportunities for networking with other Centres in the area.



A benchmark for accreditation process that is followed by all assessors so there is no bias. E.g. our first accreditation experience was bad as the accreditors told us she did not like the look of the centre too new, when we were reassessed we got top marks in all areas and that person did not have a problem with the centre. How can this be a fair assessment??

More resources made available to childcare centres at low costs.

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42.

We do not have any specific points to make at this stage but do wish to advise that we are generally finding it quite stressful implementing and becoming familiar with all the new regulations, policies and procedures. The time needed is significant and the day-to-day responsibilities of caring for children and managing a LDC Service are already a major commitment for management and staff.

My main issue at the moment is with Certified Supervisors. I'm assuming it's not such an issue with the bigger centres, but because I only have one GL and Ass on between 7-8am and 5-6pm, they must have a Supervisor Certificate, and it's worse for Kylie at the other centre as she always only has the one of each on, so they must hold it to be able to work there. We only have a small pool of staff to be able to roster from, whereas big centres may have 20 or so, we only have 3. I am currently swapping shifts around to make it work, but have had to employ a new GL to start this week (due to one staff heading overseas and one soon to go on maternity leave) but can't put her on opens or closes due to this new Reg, and it's taking 60 days for certs to be approved, however after explaining numerous times to my ECO, she finally understands the situation and said I can ring ACECQA and try to have the process expedited, but my staff and I are put out in the meantime.

I'm also finding it frustrating, as you know we had Brianna RPL the certificate III to be able to step up as GL, but now due to these Regs, she's not able to work as GL anyway because she's not eligible for the Supervisor Certificate. I find it bizarre she can do one, and not the other when some of my other staff that automatically receive the certificate have the same quals and experience as her. They were just already in the role as of 31/12/2011.

There really should have been a transition period in place for the Supervisor Certificates for new staff, as no one knows about it if they've been out of the industry for the last few years, and sad as it is, my best option for employing a new staff member was a lady who's been a stay at home mum for the last few years, rather than staff applying from other centres that would have had the certificate.

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43.

One of our greatest concerns is the cost of implementing the position of an Early Childhood Teacher. Are the Federal government going to ensure a level playing field in funding of these positions? After all we already use the same framework as Kindergartens and on hearing feedback from families we provide much more information concerning children's wellbeing, experiences and development than State preschools.

Kindergartens receive state funding through the education department for their Early Childhood Teachers. Will we also receive the same level of health and wellbeing support from the state government? Currently we have to seek support from other agencies.

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44.

I know the government is looking at training and putting funding into staff training for our industry but this is not the answer. Training does not stop people treating the industry like a stepping stone to their next career, it does not stop them from being low achievers as the training is free and so not a lot of value is placed on it (this is categorizing), due to the low pay rate the industry attracts people of a lower ambition.

Now I am not being politically correct here at all so please don't quote me but I think you get the gist of what I am on about. I can't help but think that if I advertised \$30 per hr for a child care educator I would get the cream of the crop apply compared to if I advertised the same position at \$18 per hr, which is the approximate current rate.



I want the cream of the crop! I am sick and tired of wading through uneducated people who think that educating children is playing with them, stopping them crying and changing a nappy on occasion. Thank you for your efforts

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45.

Here are a few concerns we have;

- The cost of implementing the new systems to meet regulations
  - The extra time needed to fill out the endless paperwork
  - Smaller centres are at risk of going under due to affordability
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46.

Our concern is the 3 hours per day transition to school program, we are trying to write the policy so that school readiness/ transition school occurs everyday as part of the whole curriculum inclusive of all children not just the preschool aged children. Not sure how you can document 3 hours per day.

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47.

1. Government implemented NQF from 1st of Jan 2012 without any financial support to the centres as it is incurring lots of costs of preparation, training, resource provision and staffing.
  2. Due to low wage rate (as compare to other similar occupations) and NQF pressure good human resources are leaving the industry.
  3. CCR is poorly regulated as few parents on 100% or more CCB don't pay their fee to the child cares and get CCR from government as well. Unfortunately here is no way Child Care Centres can report for their non payments.
  4. There should be a regulation that child getting a place in a child care centre must bring a clearance of payments and child report from any previous centre.
  5. Finding an experienced staff is very difficult because of above mention reasons.
  6. The School Transition Report should have a space for child's behaviour as well. In this way any concerns, plans or strategies been used by the child care centre can be communicated to the schools.
  7. Providing Kinder program (Kinder Teachers) is mandatory for new licences whereas
    - stand alone kinder (4-5 years) are separately operated in the area at very low cost so parents and Kinder teacher prefer to go there.
    - No many experienced kinder teachers are available.
    - This result in low occupancy and high cost for the operators.
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48.

Short time frame to complete the QIP. We hear rumors that those who will be assessing our centres have not

Finding Diploma & Early childhood qualified workers. (impossible to get early childhood teacher). We need this requirement delayed until more training has become effective.

Having to have 2 Diploma qualified staff in under 3s once the number is over 12.

Hardline the DEECD officers are taking insisting we have all policies in place reflecting the standards, introduced in Jan 12, in which educators and families are meant to have input.

Coping with the increase in staffing costs for under 3s and not being able to put up fees sufficiently to cover this.

Lack of staff training, close enough for staff to willingly attend and except for CS seminars, training sessions are often booked out.

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49.

The problem I see will be to get certificate 111 people for short shifts or casual position short notice eg I have cook that works 3 hours per day and has been at the centre 5 years . When the 2 educators have their lunch break (1 hour total) I can't use her because she must have a certificate 111.  
How am I going to get anyone to replace her in 2014.

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50.

Our points would be the same as many others in a remote setting.

- We doubt we will ever be able to have a teacher and run a kindy program.
- We already find it difficult to attract let alone retain staff and we have no housing in town.
- The award not reflecting the new job titles, and assistants that are having the same duties as GL as they are all now educators receiving less money.
- The talk of funding for families for nannies and not child care.

51.

Concerns are:

- The cost of extra staff for the under 3's. Along with the cost for staff super going to 12%. How do we cover all this and not have it impact on fees?
  - The different opinions we are receiving on how to program and what is relevant and evaluations are kept up. Need more time for programming per week for staff (again, a cost factor).
  - CCB having to pay us in arrears. Why?
  - Not able to get answers from the department regarding the NQF. So far I have had 3 different answers to the same question. Not enough staff at the Southern region office to answer the phone.
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52.

Some concerns with our centre are:

1 - Funding for Services. Postcode 2763 missed out on funding. However I believe any form of funding and assistance would be beneficial for all centres. Schools etc receive funding from the government, child care centres should receive that as well.

2. - Provide the ECT funding yearly and not just one off to assist with on-going costs.

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53.

- Reward staff for their hard work and effort (through Government subsidised wage increases) they are required to do towards EYLF and providing high quality care for all children under the age of 5 years. The "So called" most important years of a child's life. According to the Government.
  - How do we find Quality staff when a check out operator earns more than child care workers???
  - The \$5000 grant being offered to centre's to assist with EYLF training and preparation be given to every centre not just centre's in a low socio-economic suburb. What does that have to do with a centre's financial status??? Every centre has to find the money for EYLF. This is discriminating against children in the end. Centre's in the same area all charge the same fee. Parents in every centre get the same CCB and CCR depending on their financial situation. We are in Woodville West and centre's in Kidman Park received the fund??? They are classed as a low socio-economic area?? Don't think so!!
  - Are Not for Profit and so called for Profit centre's and Kindergartens on a level playing field. Are not for profit centre's and Kindergartens still receiving government handouts??
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54.

As for the deadline of preparation by end of April, I just can't see that happening especially for us at the moment as we are recruiting a new co-ordinator. I am finding that a lot of job applicants are not as far advanced as we are. Rather than rush the plan and stress out the staff we are going to continue our weekly plan. That way I feel all staff have a much better understating of the changes.





My personal feeling is that the cart was put before the horse once again. Nevertheless we will get there but in our own time and without deadline stresses. We are here to educate children not to be tied up in masses and masses of paper work.

My great concern is taking valued trained staff away from the classroom to accommodate masses of documentation. That is when education for children is compromised.

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55.

My biggest concern is for the Childcare Industry as a whole and the perception within the community of what is considered "current practice" as follows:-

- \* The overwhelming increase in paperwork to record learning outcomes and daily interactions, which takes carers away from interacting with children in a loving, nurturing way for which they have been trained, instead, carers are stressed about completing paperwork.
  - \* As a teacher I can attest to the importance of establishing a strong sense of social and emotional development to develop a child's self esteem and confidence, with these acquired skills, children can easily learn ABC's and 1,2,3's later on and will have the confidence to take risks and ask questions to develop learning.
  - \* Carer's qualifications and accredited courses do not include the current content for which they need to record daily events in other words qualifications are not consistent with daily practice expectations.
  - \* Many parents refer to childcare (LDC) as "school" as opposed to early childhood education within the LDC setting.
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- END -

