



21 December 2012

Senator Barnaby Joyce  
Senator for Queensland  
Leader of The Nationals in the Senate  
PO Box 628  
ST GEORGE QLD 4487

Dear Senator

### **National Quality Framework for Early Childhood Education and Care**

The National Quality Framework for Early Childhood Education and Care, implemented by the Australian Children's Education and Care Quality Authority in conjunction with the Regulatory Authorities in each State and Territory (the Office for Early Childhood Education and Care in Queensland), was introduced on 1 January 2012. It is a national approach to the regulation and quality assessment of early childhood education and care services, and applies to most long day care, family day care, preschool and kindergarten, and outside schools hours care services.

The Framework includes the following parts:

- A national legislative framework that creates a uniform national approach to the regulation and quality assessment of education and child care services in Australia;
- A National Quality Standard that sets a national benchmark for the quality of education and care services;
- A national quality rating and assessment process that rates services against the National Quality Standard and the national legislative framework.

The National Quality Standard has seven components:

- Educational program and practice;
- Children's health and safety;
- Physical environment;
- Staffing arrangements;
- Relationships with children;
- Collaborative partnerships with families and communities; and
- Leadership and service management.

The Local Government Association of Queensland (LGAQ) welcomes these reforms, which were designed to ensure a high national standardisation of quality care for young children. However, the LGAQ has some concerns regarding the application and inflexibility of new requirements that do not take into account individual circumstances.

Some rural Queensland councils have raised the problems associated with attraction and retention of suitably qualified childcare providers and directors with the LGAQ. This is a large problem shared by rural and remote councils through Australia, as these councils undertake a vital service for their communities – they are the primary organisations that sustain the social fabric of their rural communities, filling the gap in delivering human and other services that are normally provided by the private sector in larger and more urbanised areas.



There is a well-documented skill shortage in rural and remote communities, with councils often unable to offer suitable rates of pay in order to attract and retain qualified staff, as well as a lack of services and lifestyle issues in rural areas that can also impact.

This is currently the case in two particular councils – Etheridge Shire Council and Croydon Shire Council. The Etheridge Shire Council's childcare centre is located at Georgetown, which is approximately 1400kms from Brisbane, 400kms from Cairns and 300kms from Normanton. Georgetown has a population of approximately 260, and is the administrative headquarters of the Etheridge Shire Council. The Shire has a total population of approximately 930. The Croydon Shire Council's childcare centre is located at Croydon, which is 2200kms from Brisbane by road. The Shire has a population of approximately 270, two-thirds of which live in Croydon and the rest on large cattle stations. Approximately one-third of residents are of Aboriginal or Torres Strait Islander origin. Croydon Shire residents are also some of the most disadvantaged in Queensland, with 67% of residents being in the most disadvantaged quintile compared with a 20% average across Queensland (this measure is based on socio-economic criteria, including income, level of education achieved, employment, housing and access to vehicles).

The director of the council-run childcare centre in Etheridge Shire Council recently resigned. In that case, due to the difficulties described above in recruiting an appropriate replacement, the council was granted an extension by the Office for Early Childhood Education and Care. Etheridge Shire Council is currently 4 months into a 6 month extension but is struggling to recruit a suitably qualified director. If a director for a childcare centre is not found, then the childcare centre will be closed.

Croydon Shire Council operates two services, a 21 place child care centre and an outside school hours care program. Of the 6 staff employed between the two services, 3 are currently on maternity leave, including the nominated supervisor and the senior certified supervisor. Due to the qualification requirements under the NQF (Regulation 302), Council has had to close one of the services for the last term to ensure the remaining service could remain open. Even then, Council had to seek an exemption from the regulator for not meeting the educational ratio of at least 50% of the educators being at least diploma qualified or enrolled with no staff currently meeting this qualification. An initial 5 day exemption was given by the Department which, on request, was extended to 28 January 2013 when the senior certified supervisor is due to return from maternity leave. The service will still not satisfy the regulation which is about educational quality and will have to seek further exemptions until the director returns in October 2013. Council has been attempting to fill the position of acting director since early October without success.

From 2014 when the requirement for centres to employ a 4-year qualified early childhood teacher commences, there will be a further financial impact on Council even if an alternative educational delivery mode is found.

As with many rural council areas, the council-run childcare centre is the only childcare centre in the area, and any resulting closure will have a great impact on the community.

In the LGAQ's Capacity Building Needs for Non-Amalgamated Councils report that was published in October 2009, LGAQ called for "a greater recognition of the capacity constraints in smaller councils, and possibly some exemptions from particular requirements...if sustainable local governance was to be achieved for these remote locations". In addition, the Australian Centre for Local Government Excellence's paper called A Capacity Building Strategy for Rural-Remote and Indigenous Local Government, published in March 2011, highlighted that "rural-remote councils are commonly expected to provide a greater range of services than their regional and urban counterparts... [and] often assumed a 'provider of last resort' role in order to ensure the sustainability of small communities." The paper stated:

"In addition to the pressures of community expectations and withdrawal of services, the capacity of rural-remote and Indigenous councils is also challenged by unrealistic policies and demands of the





other levels of government. The scoping studies in WA and Queensland particularly noted concern about 'one-size-fits-all' approaches taken by government agencies, without due consideration of the appropriateness of the functions expected or the requests made of different rural-remote and Indigenous councils."

The LGAQ believes that due consideration of the impacts of the new National Quality Framework for Early Childhood Education on rural and remote councils and communities was not properly undertaken when the policy was being formulated.

The LGAQ advocates strongly for a more flexible approach to be taken by the Federal and State Governments, with the possibility of permanent exemptions in certain circumstances to be granted to council-run childcare centres in these locations.

Your assistance is requested in securing a more flexible approach to the operation of the National Quality Framework in rural and remote communities. It would be extremely unfortunate if an unintended consequence of implementation of the Framework is the closure of these childcare centres and others like them with the subsequent negative impacts on these rural and remote communities.

Yours sincerely

Cr Margaret de Wit  
PRESIDENT