

## Jolly Frog Private Kindergarten.

Service approval number...1-631-2905

Organisation no 1-5YS-36

Primary contact person at the service is Eileen Byrnes.

**Location...**

5 Howe St

Westmead

NSW 2145.

**Approved Provider** is Eileen Byrnes.

Contact details

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**Authorised Supervisor** Eileen Byrnes

**Nominated Supervisor** EC teacher Voula Filipou.

Operating hours are at present ...

8am to 4pm. Monday to Friday.

We are licensed to take 39 children per day.

25.01.2014

Please accept this as my submission to the Productivity commission.

Forgive me for not following a 'template or parameter' for this submission, I find them too constraining and cannot work to such a confined method, a method that can sometimes mean a person's true concerns are not properly conveyed.

Also my experience mainly consists of managing a private centre although I did originally work in another private service before buying my own, I am addressing the concerns I have as an owner provider, also the concerns that have been raised by my clients and staff over the past 40 years of service to this industry.

### **In respect to the Accreditation Ratings System and Procedures.**

#### **Regarding the overall service rating ....**

I suggest that the overall service rating lets centre staff, management and their clients down when they are judged as meeting or exceeding in most areas and yet marked as a fail because they weren't judged as achieving in one or two areas.

This is a ridiculous measure and does little to promote the services' confidence in the process.

I believe that relating the final ruling to the overall rating rather than recognising the individual quality areas is failing this industry.

### **In respect to the wording of the final rating assessment....**

Please dispense with the rating 'Working towards', **in all services, public or private, staff, parents and management regard this as a mark of failure.**

The wording of this rating is even more particularly so for non English speaking parents, as far as the general public is concerned 'Working towards' is a fail and the centre so rated should obviously be closed.

Staff (and management) are wondering why they bothered to gain qualifications if their expertise is to be so downgraded.

Why not grade centres as 'meeting the standard'?

The supposed 'new standards', although they are touted as having 'raised the bar' are actually not much different to the previous supposedly out of date standards when the majority of centres were

assessed as 'high quality'. Surely it is not suggested that the previous system 's validators were not aware of the importance of their work or that the previous system was dysfunctional?

#### **In respect to the overall accreditation system....**

Forgive me for referring to our own experience with the accreditation system, this is what I have to guide my response to your request for a submission, that and the anecdotal stories I have heard from colleagues.

In our own case we were downgraded in only two areas, one was regarding staff appraisals - in a small centre where all the staff were long term employees and had mostly at management's cost, gained all of the necessary qualifications, first aid certificates etc., worked well as a team.

The fact that we didn't conduct 'formal corporation style' appraisals however was considered as not meeting the standards required, even though all staff had worked in the centre for more than eight years and had completed appraisal check lists in the past!

All staff had a 'job description' read and signed by them incorporating a commitment to update their skills, the fact that we had done all of the above before we were required to by the accreditation body was not given any consideration.

The other area was in respect to our 'non current' Anaphylaxis and Asthma training which I will also address in this submission.

In normal assessments a result of two areas not met out of 65 areas would be regarded as an excellent pass.

#### **In respect to the appeals process....**

It is true that centres can appeal to have the decision reversed, however, the cost to do so is far too high and the departmental officers seem very reluctant to reverse a ruling, no matter how reasonable the appeal may be. The premise appears to be that they will support the assessors rather than the centres and this does little to promote a healthy and enthusiastic children's services workforce.

If centre staff and management are willing and determined to go to such lengths and expense to prove that the assessor has misjudged their practice only to be dismissed over and over should surely send signals to the accreditation committee that all is not well with the system.

This was the demoralising experience we had at our centre. We were left feeling humiliated and betrayed and are at present proceeding through our final appeal against a 'working towards' ruling. After many years of providing a quality service, this is very difficult for all concerned.

We believe that qualified long term and well trained staff and management's word should be taken into consideration when assessors are given assurances regarding future plans and commitments for the centre, especially when there is a paper trail of evidence to that commitment.

We believe that there should be some flexibility embedded in the system, this does not appear to be possible at present for some of the assessors because they have previously been employed in the compliance areas of managing regulated services.

We attended information sessions when the new standards were first being promoted and were led to believe that past performance would be considered when we were assessed, what happened to that commitment?

#### **In respect to assessors .....**

Please ensure that 'assessors' in an effort to put staff and management at ease do not lead service staff and management into believing they have achieved accreditation by being too effusively complimentary about the centre and their methods.

Perhaps 'assessors' could be specifically trained for the position -- using compliance officers from the state regulations bodies is causing some concern in the industry as they have been historically trained to look at centres in a specifically compliance mode.

EYLF constantly states that there is no one way to achieve an outcome but the assessors appear to believe that this is not the case and cannot accept even minor differences as being acceptable.

Ideally assessors should come from all walks of life and perhaps hold many different qualifications apart from specific training in assessment procedures so that they have a 'real world' perspective. Assessments by peers may be a way of introducing some common sense into the system.

#### **In respect to consistency of assessments....**

Services are complaining that there is no consistency from assessor to assessor and that assessments seem to be targeted at different areas in different communities.

Word goes out to centres that "they are looking at sustainability" or "they are concentrating on safety notices", or "they are checking observations", believe it or not we all support each other in this industry and believe that what hurts one, hurts us all. We check with colleagues to ensure that we are providing the 'correct' amounts of paper work etc.

We all aspire to be the best, ours is not the easiest job in the world, we are on our feet all day dealing with the public, coping with regulatory changes, as well as pursuing acceptable, regulated qualifications and managing families, it would be great if the departmental officers took time to realise that we wouldn't be working in this industry if we didn't love working with children and recognise that we are good at what we do..

It has been noted that centres are downgraded for spurious reasons, such as not having specific words in policy documents, for not quoting 'current' theorists, for not including dates of updates, or lists of absent children's names in fire drills, for not using sustainable practices because they had cardboard in the bin, for not 'updating' a policy that is actually working well for the centre and was devised to suit that centre's needs.

If policy documents are meant to be so specifically worded then perhaps ACECQA should provide each service with a national policy manual that meets ACECQA's needs instead of expecting us to compose our own with staff and parental input and then downgrade us for such silly reasons.

When we are expected to devise policies that work for us and actually put in the effort to do so we should be given credit for the work involved.

#### **In respect to regulatory changes introduced ....**

The many changes introduced over the recent years have increased the workloads of management and staff considerably and although many entrepreneurs have sprung up with courses designed to meet the new training needs they are not always supplied to centres in accessible areas at a reasonable cost, or in accessible hours, nor are they always deemed acceptable to the regulators, often they are fully booked before staff become aware of their availability, sometimes staff have had to wait months before being able to attend a course in their area, the costs of obtaining qualifications, or attaining higher or different qualifications has caused some long term fully experienced staff to leave, increasing management's costs and workloads to replace and train new staff.

None of the above appears to have been considered as being an impost on services or staff by departmental officials.

No consideration is given to the fact that until recently many staff had lots of experience and attendance at short courses but no 'acceptable' qualifications, some were educated overseas, all of these people are now expected to update almost at once, most course providers would affirm that their courses are booked out within days and impossible to access.

The fact that in our case we could prove that we had booked for Anaphylactic and Asthma training for all of our staff after endeavouring to achieve this for many months was either not believed or not considered as relevant by our assessor, who decided that although we had done relevant courses in the past they were not 'current', (considering that regulations only require one member of staff to acquire this certificate we could have been given credit for providing this opportunity for 8 staffers to take part).

Please ensure that the word 'current' is replaced by a specific time frame in the regulations! What is current? Is it five years or ten years? If nothing has changed since the last course completed why should busy and time poor staff need to renew?

### **In respect to the repetition of quality areas ....**

Some of the quality areas are overlapping and this should be condensed so that the assessor's ability to assess the centre is not confined to repetition, how can an officer be properly aware of the established relationships with children, staff and clients in a centre when she is frantically checking to see if the staff have used the correct wording in the policy documents, or some other silly nonsense that has absolutely no effect on the day to day management of the centre.

Our assessor was hardly able to observe what was actually happening, our routines and our relationships were all regarded as meeting or exceeding the expected standards, however we didn't feel that this area was given the attention it deserved because of the paper work she was involved with. Several of our children's parents offered to stay and chat with her about the care we offer however this didn't appear to be something that the assessor would approve of.

### **General concerns with the accreditation system as a whole....**

Concerns about regulations and accreditation are not new to me as I have more than 40 years experience in this industry, working with children and their families is a career that I have loved and have been successful in, however, I am sick of having our work in this industry downgraded, I have travelled in other countries and observed other services, the system of children's services offered in Australia is in my opinion one of the best and most comprehensive in the world, this is something we should as a community be proud of, let us please support centre staff and management public and private in the work they do so well.

At present most of us feel let down by this system.

### **Concerns regarding the provision of care and education and the management of subsidies.**

My other big concern is to do with the management of CCB and CCR, I have long lobbied for subsidies to be given directly to families in need, this would be easily managed by the governmental systems already in place such as Medibank or social security and would remove much extra work for centre management, work that is totally unrelated to the work we are employed by children's parents to do. As a teacher of small children I never wished to become a government bookkeeper and I am afraid that is exactly what has happened to many of us.

If families are in need of subsidies then they should be given that subsidy directly on production of a receipt from a registered service.

I fear that I am a lone voice regarding this aspect of children's service but I am raising it with you in the fond hope that someone else will agree with me and see the sense of removing this burden from children's services.

### **Equality of service management public and private.**

I also believe that community based services should be managed in the same way that private sector services are in that the fees paid pay wages and running costs, of course if no private sector business person would build a centre in a particular area the governments involved would still provide set up costs for building equipment and possibly the wages for the first three months after that the centre should be financially independent of government assistance.

Governments and councils could then apply the funds they spend now on supporting centres for children with special needs.

### **Centre opening and closing hours availability to public etc.**

I believe that council and government's enforced registration practice of licensing a centre for maximum or minimum hours means that children are being left in centres for longer hours than their parents actually need, many in our society work part time and only need a child in care for shorter days. The ruling that a service remains open for 48 weeks and 8 hours a day is inflexible many parents only wish to use a service for the same opening hours as primary schools.

The government at present is applying funds to families purely and simply because their service is open for ten hours a day and charges for the whole day when they should only be funding for hours actually used.

There must be some way of providing a flexible license to centre managements so that a service could supply the hours a family needs.

If a centre is to be open at night for shift workers then the requirement for Early Childhood qualified staff would need to be reassessed as the children attending would mostly be provided with an evening meal, some play time, maybe a bath or shower and a time to do homework or sleep.

The wages and insurance are the most significant costs in a centre, the introduction of highly qualified people to serve as carers in centres where the children are enrolled while their parents work has increased costs so as to make affordability a huge problem for working families, perhaps the government needs to take a close look at how those subsidies are delivered and to whom. Is there really a need for the separation of the rebate and CCB the subsidy should be a private concern between the parent and the subsidising body, this would also remove the extra burden on the governments of policing the centre management of parents fees subsidies.

Of course we must have regulations, however the constant changes and the somewhat unrealistic expectations of the inspectors makes it very difficult to stay abreast of the red tape. It would help if governments realised that our training and experience is comprehensive and that we do not need to be constantly attending more and more courses to prove we are good at our work, surely if we have completed the required level of education stipulated in the regulations and the parents are satisfied with the service offered then that should be enough.

### **Concerns re availability of services.**

In my more than 40 years of service I have noticed that local demographics directly affect the availability of care in an area, we go through cycles when a centre is full but over the past ten to fifteen years this is constantly changing almost week to week as familys situations change. When one contacts people on the waiting list they have usually found alternate care.

I strongly believe that the government should let market forces decide about regular care situations and concentrate on providing centres for special needs and perhaps baby care services.

In closing what I really wish is that some one in the government would say to all of those like me who run successful private services....

"Thank you for taking the financial risk and providing an excellent service to our community, thank you for providing positions for staff so that they pay taxes and contribute to their own welfare, for taking special needs children when no-one else would, thank you for providing access to courses for your staff and sponsoring them financially whilst they complete their certificates, thank you for paying commercial rates, for working to update your centres during holidays when every one else is goofing off, thank you for continuing to work and not expecting the government to support you, you are doing a great job'!!!

Wouldn't that be nice!

I would be happy to meet with any official to discuss my concerns either in my centre or at the official's convenience.

Thank you for this opportunity to voice my concerns.

Faithfully

Eileen Byrnes

Director of Jolly Frog Private Kindergarten.

CC to ministers. The Hon Sussan Ley and The Hon Christopher Pyne