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Dear Sir/Madam

Context:

Merindah Children's Centre is a 39 place long day care service licensed for children aged 6 weeks to 5 years of age and is located in Wallsend, NSW, near Newcastle. The service has operated since 1991 and is a community based service managed by a volunteer committee. It employs 13 educators in fulltime and part time roles whose early childhood experience totals more than 130 years. Educators have attained various early childhood qualifications including Bachelor of Education, Bachelor of Teaching, Diploma of Children's Services, and Certificate 3 and seven educators are currently working towards higher qualifications in part time study. Merindah Children's Service was assessed in October 2012 and the initial draft assessment indicated the service as meeting in 57 elements and 1 element not met. Overall the service exceeded in all standards except for element Area 2, which resulted in a rating of "working toward". In January 2013 the service received their "overall exceeding" rating with 58 elements met and "exceeding" in all 7 quality standards.

1. Affordability

Merindah Children's centre is a not for profit organization and increases its fees in accordance with running costs and educators wages at their appropriate qualification levels in relation to the award. Although we are community based we currently pay rent to the council of approximately 10K per year since 2013, no longer receiving free rent. Our fee level decision is also based on ensuring that the level of qualification of the educators meets the regulations. We have found that the greater experience and qualification of educators is an important factor in providing a quality service and outcomes for children and families however this comes at an increased cost to the service which is passed onto families without a profit margin. We believe that our

presence in the ECEC market as a not for profit community based service has an impact on market price of childcare.

2. Accessibility

Currently the service is 100% full and have approximately more than 100 families waiting for a position, with some families placing their name on the waiting list as soon as they are expecting a baby. The wait time for positions varies, however the younger the child the longer wait time for a position which is currently around 12-18 months in many cases.

The cost of staffing with regard to the educator to child ratio in 0-2's is a factor in not increasing the positions in this age group, despite the obvious need for families and the community.

Families from various backgrounds use the service, including, but not limited to non English speaking, students, indigenous, single parent families, those with additional needs and those at risk.

3. Additional Needs Children

The service has a number of additional needs children with various diagnosis' including autism, global delay, behavioral, speech delays, and medical conditions which has a huge impact on our service. We are fortunate that our experienced early childhood teachers are skilled in being able to work with the children, families and professional agencies to care and educate these children.

However, if experienced educators were not accessible and/or not as specialized in this area it may result in children transitioning to school with needs, without diagnosis or support, which is not beneficial to the child, family or community. It is interesting to note that the inquiry has identified children transitioning to school with additional needs are not being picked up in early childhood. We believe this is a direct result of experienced early childhood educators not being available or having the skills to identify when children are not meeting outcomes. Furthermore there appears to be a lack of professional recognition for teachers working in Early Childhood and at times their feedback is dismissed. Furthermore, at times, families may refuse to act on the professional opinion of early childhood educators. Perhaps this is also due to denial. Therefore ECEC is left to struggle with additional needs that go undiagnosed. In addition, ECEC funding is difficult to obtain to support the inclusion of the child with limited cost reimbursement for support educators, limited hours of support to provide inclusion for these children. Thus resulting in stretched resources, out of pocket expenses to the service and educators sometimes without the knowledge and skills to meet that child's need or the group of children in which that child is included. Additional needs services are limited in our area for children in early childhood where educators are specialized in this field.

4. Professional Support /Training

Inadequate training and support has impacted on the introduction and continued implementation of the NQF reforms particularly in the training of existing educators in

line with the introduction of reforms. Once again a postcode system was used to determine needs based on certain areas which again did not allow our service to access funding to support the implementation and reforms of the EYLF& NQS. This is disappointing and impacted on the service having to fund the training needs of its educators and community themselves which has had a negative impact on running costs, which has resulted in the service being forced to pass this on to families in increased fees.

The support of government funded support/ peak bodies has also been almost non-existent with forums always booked out or inaccessible locations and the cost to the taxpayer in relation to support received for this service has not been cost effective. We have had to pay for private support and training which again has been passed on to families. We believe that the cost of implementation and support to services should have been more effective with say the training/support body for the state supporting services/educators divided evenly ie: If 4 million dollars of taxpayer funds are distributed amongst 4800 services in NSW all services should benefit to some degree yet this has not been our experience. ECEC need professional development by 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 stop the move forward and the social investment will be wasted.

If funding is to continue to these support services then there needs to be a more effective process to ensure funds to all services are evenly distributed to provide support to educators/service and should be accessed as financially effective to meet the outcomes of the program. Once again the ineffectiveness and lack of support funding in supporting the service has been passed onto families as this had to be sourced privately with a reputable private company that met the needs of the service to support the service to exceeding NQS.

Diploma and Certificate III

Educators at the service have been trained by various RTO's and Universities over many years. We also host many students from the same.

There appears to be an obvious lack of current EC content from some registered training organizations that is evident in their course work and their teachings. We believe that this is a result of historical knowledge that as a direct result of lack of current qualification levels of trainers and believe that the training of all educators should be delivered by a minimum 4 year university trained early childhood teacher who holds current qualification industry experience. This will stifle the full enactment of the reforms of the NQF not providing a current source of new pedagogical knowledge and understandings limiting the potential outcomes for children and goals of the reforms.

Early Childhood Teacher training, subsidies and impact.

With the new reforms many diploma qualified educators at the service choose to upgrade their qualifications to meet the impending requirements of the regulations at their service and in their roles. Without the upgrade the diploma qualified educators were unsure of the impact the requirements would have on their employment in the service. Furthermore these educators were aware of the legislation of Universal Access and strived to meet these initiatives.

The cost of upgrading has been enormous (approximately \$6000 for 3 year ECT and \$12000 for upgrade to 4 year gualified) with all teachers not meeting the Australian Taxation Office EC training initiatives which discriminated by postcode and the award renumeration rate being the same or less on completion. In addition to the cost all workers have undertaken approximately 1200- 2600 hours of study whilst working and having to use leave for the purpose of practicum therefore the impact of their professional dedication has had a huge social and economic impact on leisure and family time. The benefit to the service is the professional expertise that these teachers now have instrumental in enacting the new reforms, current pedagogical knowledge and theoretical perspective that impact on the teaching practices and learning outcomes for the children at the service. The additional benefit is that the service educators have effective and knowledgeable leaders who mentor the less experienced or qualified team member to understand and enact high quality early education and care outcomes. The further insult to these newly qualified teachers is that ACECQA has now noted that the preferred ECT qualification is for age group 0-8 whilst these educators have specifically fully trained for the 0-5 age group to which there role relates. 4 year trained 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.

5. Competency and in consistency of authorized compliance officer (assessors for the Rating and Assessment) effecting ratings and service reputation.

We believe that some assessment officers are not received adequate training and/or have a lack pedagogical current knowledge to acknowledge and assess area one. We believe should have at least 4 year university gualifications that are current with recent industry experience for the rating and assessment process to be fair and consistent. Furthermore, they should be competent in assessing standards and not be using their opinions and subjectivity to impact on the outcomes of the ratings for services. Their compliance background is confusing the NQS as they are looking for specific things which then become unspoken laws. Eg: heating baby bottles, assessing area one influenced by their understanding of the document and historical experience. There appears to be too much subjectivity and bias possibly due to lack of current knowledge, qualification or experience. This inconsistency is also evident between states and regions as educators share experiences in network groups. This may be due to past experiences with EC good and bad with services or grandfathered qualifications or dated experience. It is our opinion that authorised officers 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 perhaps even privately contracted auditors with the mentioned qualifications, knowledge and experience. The competency and accuracy of the officer is impacting on the service reputation and marketability which may have been the case in our circumstance where we had to strenuously challenge the opinion of the assessor that was nor the law or the regulation. We should have not had to put the hours of time, labour hours or stress into providing feedback for something that was only the opinion of one authorised officer. In our case the cost to the service was around 4 days of challenging the opinion of the authorised officer who had based the proposed rating for our centre on her opinion and misunderstanding.

To add further insult to our professional judgement three months later another ACO came to the service to do a compliance visit. She was happy with everything on the day however 2 working days later rang back to challenge the nominated supervisor about our bottle warming procedure which had been the issue that had to be disputed in our draft rating. We felt this was inappropriate as we had clearly demonstrated that we had been protecting children and had contacted managers in the DEC to confirm this however she continued to not respect our professional expertise. As a result I raised the issue with the regional manager of the DEC. The matter once again was directed back to the management committee and the policy and procedure reviewed and ratified, wasting more time and cost which again gets passed onto the families.

We believe that 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. The quality of a service should not be determined by one element not being met, in the opinion of one person, thus resulting as a FAIL. Is the difference between an exceeding service and a working toward service the fact that we used a microwave to heat baby bottles?

6. Inconsistency with regulations across states

The inconsistency of national regulations and the savings provisions is also a factor in inconsistency in ratings. For example our service would have to find a qualified ECT to replace a teacher on leave whereas the teacher under the national regulations could be replaced with a familiar diploma qualified educator who has familiar relationship with children at the centre which is a more positive option for the children, other team members and families. We strongly believe that ECT's with current knowledge are a huge benefit to the social outcomes for all children, families, communities and the future social and educational outcomes of the nation. We believe the enactment of the reforms is not possible without the input, dedication and knowledge of early childhood teachers who have been trained by universities and have understanding to enact to the curriculum framework.

Our thoughts

- The Early Years Learning Framework is a brilliant document which we would like to see fully enacted throughout ECEC.
- The National Quality Standards is also a good document but the assessment and rating process is failing it with inconsistencies and lack of current knowledge in ECEC which is impacting on the service's reputation and marketability.
- The overall rating needs to be removed or changed to accredited or not accredited, the term working toward has to be changed as it is considered a fail.
- The assessment needs to be undertaken by independent assessors who are competent at auditing standards and area one needs to assessed by an officer of at least a current 4 year early childhood qualification with recent EC experience.

- Early childhood teachers are an essential element of the ECEC to enact the EYLF and lead quality improvement.
- Funding for support agencies for ECEC for states and nationally need to be more effective and fairer as all services need support.
- Funding for additional needs children needs to be more easily accessible to support children, families and educators for better outcomes.
- Early childhood teachers are essential in services to support additional needs children and families for ongoing identification of needs and strategies for their care and learning.
- We believe the cost of the reforms has been borne by individual educators who have invested time and money into upgrading their qualifications with the benefit being improved outcomes for families and children.
- We believe that the reforms were rushed and underfunded which has caused much confusion in the sector further impacted by ineffective support and training funded by the government.
- In many instances, the early childhood educators, are spending far too much time ensuring that they remain compliant with legislative reforms, which takes away the time they should be spending caring and educating.
- We believe that the positive impact of the NQF are visible in our service and support the continuance of the initiatives with more consideration to support fairness and consistency, respect of professional judgment and reduction in the compliance approach of regulatory authorities in undertaking their public service roles.

We are passionate about high quality ECEC and strive to be seen as a leading example of an 'Exceeding" quality service. We hope that our submission draws attention to the challenges we face and the continued improvement across ECEC for future social and educational outcomes.

Kind regards

On behalf of Merindah Children's Centre Inc. Nominated Supervisor