



**Submission to the Productivity Commission's study
on the
Early Childhood Development Workforce**

January 2011

CCSA

Community Connections Solutions Australia provides information, training and support for approximately 600 services across NSW and the ACT that work with children and families. Some members also operate into Victoria and Queensland. It is a not-for-profit, membership based organisation with members drawn from a range of regional, remote and metropolitan locations and includes a broad range of service types-

- Preschools
- Long Day Care
- Occasional Care
- Multi-purpose
- Mobiles
- Outside School Hours
- Early Intervention
- Multi-function Aboriginal Children's Services (MACS)
- Recruitment Agencies

For more than 40 years CCSA has been the principal organisation in the sector providing integrated and responsive governance and management support that includes industrial and employment relations information and guidance. It has been the principal sector organisation providing this support in NSW for the introduction of Modern Awards.

CCSA -

- supports all providers in the sector including boards and committees, individual owners, centre directors/coordinators/managers, administrators and educators.
- receives continuous feedback regarding service issues through its 1800 telephone support line and consultations, providing up to date information regarding service issues as well as being able to track change and its effect.
- has represented the sector industrially in both the state (NSW Industrial Relations Commission) and federal jurisdictions (Fair Work Australia) through submissions and providing evidence and information.
- contributes at a political level in the sector through state and federal reference groups regarding legislation & regulation, policy & funding.
- is a member of the NSW Health & Community Services Industry and Advisory Board advisory group (ITAB)
- is a member of the NSW state government's National Quality Framework Advisory Group
- is a member of DEEWR's NSW Early Childhood Education and Child Care Industry Liaison Forum

CCSA's contribution to the sector also includes-

- Membership of the NSW Professional Experience Council (Universities, Registered Training Organisation's and major employers),
- Membership of Early Childhood Australia NSW

CCSA is well placed to comment on the current and future needs of the sector as an organisation that supports both employers and educators in the children's services, through its continuous involvement in the training and professional development in the sector, and through continuous engagement with both sides of the employment relationship and service delivery issues, particularly with its broad base of service delivery types.

CCSA's staff and board have relevant qualifications and many years experience in professional, management, governance and policy positions within the ECEC sector in large, small and diverse organisations in regions across NSW. Some individual CCSA staff are also involved in teacher education at university level.

CCSA acknowledges the continued valuable contribution of its members to the information provided in this submission as well as partner organisations.

General

CCSA welcomes this study as, for many years, it has been an advocate for change to support organisations and educators to provide quality outcomes for children and families. The study is both necessary and timely in relation to the National Quality Agenda and COAG reforms. It is unfortunate that to this point the NQA has, for the most part, operated in isolation of other government portfolios and an integrated approach needs to be implemented if these important reforms are to succeed.

An example of the lack of integration is the effect the introduction of Modern Awards has had on the sector, and in particular NSW. It appears there was little recognition of the effects of significant industrial reform simultaneously with implementation of structural reforms in the Early Childhood Education and Care (ECEC) sector. We welcome the work of the commission and the opportunity to contribute to the identification of issues and strategies that can support the development of an integrated approach and the NQA objectives.

It is important the study acknowledge that the ECEC sector has diverse governance and management structures. Governance bodies, for example, include individual owners/businesses, corporations, community based organisations, local government, religious based organisations, large benevolent organisations, work-based organisations, universities and TAFEs. This creates very different roles for on-site managers (directors) who are rarely trained in management or have the experience to effectively manage a small business. If we are to deliver quality to children and families in the sector, we need to acknowledge the need for managers to know and understand the different governance structures and mechanisms and be able to manage EC services effectively within these structures. It is important this is recognised as a facilitator of quality in addition to the role of educators and allied professionals employed by these organisations.

It also needs to be recognised that the capacity to govern and manage from an organisational perspective varies widely. The community based and volunteer structures, while providing significant community and social benefits in excess of desired educational outcomes for children, regularly struggle to develop, and retain, the capacity to govern and manage effectively over sustained periods. The level of support currently provided by the NSW government in this area is

insufficient to support the objectives of the NQA effectively. The Productivity Commission itself has made recommendations regarding government investment in regard to “building sector capabilities to improve governance and enhance productivity” in its report on the contribution of the not-for-profit-sector.¹ CCSA agrees that this workforce study not being limited to practitioners and educators in the sector for this reason.

Community managed ECEC services make a significant contribution to their communities and have done so for many decades. They continuously develop and maintain social capital for both individuals and communities as a whole and are often the hub that supports parents and families sustain healthy outcomes. Indeed, this management model has been shown to assist children and families build connections, relationships and networks¹, the absence of which can harm child outcomes.ⁱⁱ The continuance of this model with appropriate recognition and support needs to be an important part of the NQA and considered as part of the overall workforce.

There are specific intermediary organisations² (for example peak support agencies) that work to improve and retain governance and management capacity in the sector in NSW. However, these are not funded to a level that meets the demand, particularly after many years of increasing government requirements for responsibility and accountability. There is also no systematic approach to assess or build this governance and management capacity as a foundation for the outcomes of the state government programs that respond to the National Quality Agenda, including the ECEC Workforce Development, Universal Access and the National Quality Standard. The lack of capacity at both governance and management levels (Director/Teachers) is not restricted to not-for-profit organisations. Small private operators, of which there are many, also commonly have less than adequate knowledge and capacity in this area.

Many of the professional learning opportunities currently provided through federal and state funding are aimed at employees, and in most cases, educators. Although in the not-for-profit sector, many individuals involved in governance and management are volunteers, their roles and responsibilities are equivalent to those in the private sector in regards to the stewardship and accountability of EC services. This directly affects workforce related practices and the success, or otherwise, of employment matters such as knowledge of industrial instruments (awards and agreements), recruitment, retention, correct pay and conditions and overall staff management. It is reasonable to consider these roles as part of the workforce and part of this study.

The support framework for the government’s NQA objectives also needs to respond to the almost unique structure of the ECEC sector where commonly the governance body has comparatively little specific knowledge regarding the operation of an EC service and education and care generally. This applies to both community management and private operator models. This makes the

¹ Hadley F. & Hayden J., “Social capital, participatory management and community development”, Children First Inc. UWS 2005, p5

² Summary Recommendations, Productivity Commission Research Report, “Contribution of the Not-For-Profit Sector, Australian Government, 2010 (p LVIII)

implementation of reforms more problematic, requiring an understanding of *collaborative management*ⁱⁱⁱ and the knowledge and skill that supports this approach. Reforms in other education sectors are often implemented through education departments where a government can drive and/or directly influence the program through all levels of these bureaucracies. In ECEC, reform often occurs via changes to regulation as generally government is not a direct (or major) service provider (other than local government in some cases) as would be the case in most schools. The national regulation under the National Quality Framework (NQF), where qualifications and ratios are now prescribed, recognises the need for this regulatory approach.

This unusual structure gives rise to the opportunity for conflict and tension to exist between those employed as educators and managers and the service provider, with each having potentially quite different knowledge, skill, experience and perspectives in relation to good practice and service provision. CCSA's support role in the sector provides the experience to know well this structure can lead to difficult or dysfunctional employment relationships between management and the director (on-site manager) which inhibits the effective operation of the service. Preventing or overcoming this situation requires a higher level of management skill than usually exists within a service. It requires the development of governance and operational systems that recognise the strengths and weaknesses of this structure and a collaborative management approach to respond to it.

It is pertinent to note that there has been acknowledgement by the Victorian government of the need to improve governance and management capacity in the sector. As part of its strategy it has introduced a cluster management model where several services have all, or part, of their management/administration and/or governance responsibilities handled by a single entity. A review conducted by KPMG commissioned by that government's Dept. of Education and Early Childhood Development revealed that though benefits regarding sustainability have been clearly identified, some significant challenges remain^{iv}. These include limited expertise and delivery in EC service delivery and relationships between staff, managers and parents, viability including workforce and infrastructure issues and generally the need for better resourcing.

It is significant that the report notes that ongoing commitment to the initiative was a significant sustainability issue³. This would naturally include realistic financial resourcing to support these structures either by direct funding or through support agencies. CCSA believes that with funded access to management support, services could benefit from a cluster or a multi-auspice structure, particularly smaller services and those in regional areas of NSW. There are already some successful community managed examples^v that can provide valuable information and the available research suggests an improved and sustained governance and management capacity supports good outcomes for children.^{vi}

A significant part of CCSA's support role continues to be assisting services deal with service challenges and, along with it, increase their capacity by providing accurate and timely information regarding effective staff management practices in relation to both staff and governance. The

³ Productivity Commission Research Report, "Contribution of the Not-For-Profit Sector, Australian Government, 2010 (p viii)

demand for this support continues to rise with CCSA's data showing the number of support calls received having risen by over 31% in 2009/10, with written requests for information and support⁴ increasing by 40%. The number of requests for assistance in relation to resolving workplace disputes, including mediation, has also noticeably risen in this period.

CCSA notes the comment in the issues paper in regard to regulatory burden and its connection to job satisfaction. CCSA can confirm this is also the case for the governance body and in its case, responding to regulatory requirements is only a small part of the responsibility placed on them as part of their governance and management role. CCSA notes that in many cases some of this responsibility is delegated to the on-site manager. CCSA attests that lack of knowledge and capacity at both these levels contributes to dissatisfaction and frustration for both parties.

CCSA maintains the workforce development strategy will benefit from recognising the specific knowledge and skills needed at all levels of service delivery in the ECEC sector, and furthermore respond to the need to improve the structural support provided by government to agencies with the specific knowledge and experience to assist building governance and management capacity, rather than focusing particularly on educators.

Supply of a Skilled Workforce

General

It is important that workforce development responds to contemporary knowledge and practice in ECEC. This knowledge recognises that children learn and develop continuously from the time they're born so that all care settings must provide skilled and knowledgeable staff to support this development. The differentiation between services types is valuable as a descriptor to identify the demographic of families the service is delivered to, and a descriptor for purposes of assisting parents make that choice. All care settings provide for children's education- it is the quality of these programs that is dependent on a skilled and capable staff and management. The National Quality Framework recognises all care settings as education environments.

In NSW the common title for the on-site manager is Director, though the position may also be called Co-ordinator and less frequently Manager. Under current legislation an approved 'Authorised Supervisor' is required which requires a minimum VET qualification at Diploma level (or equivalent). Additionally, services licensed for 30+ children are required to employ a university qualified teacher who may fulfil this role.

The ECEC workforce in NSW has been suffering shortages of qualified staff for some years. Parity with peers will facilitate a more responsive, focused and motivated workforce with increased quality and productivity.

⁴ CCSA is the only sector specific organisation providing this support across all types of providers in the sector in NSW.

Productivity measures in the sector also need to include the social and community benefits of service provision within communities.

Stability/Turnover

CCSA agrees that continuity of staff is a significant contributor to better outcomes for children. It also agrees that turnover is high in some situations. Stability in preschools (retention) is generally better than other services primarily as a result of more favourable conditions such as shorter working hours and little requirement to attend the preschool in children's holidays⁵, particularly compared to those in long day care with longer shifts and only 4 weeks annual leave.

A contributor to turnover is the number of certificate III trainees who complete their training on-site but are not retained by their employer. Retention would mean paying a full-time salary compared to the training wage. A further issue is that the trainee scheme encourages employers not to retain a trainee as they can then continue to access government employment incentives on a continual basis. The scheme can be used as a strategy for income generation rather than a commitment to training new staff who will become valuable full-time employees.

Job seekers without qualifications often see the ECEC sector as something that is not skilled work and they will 'feel good' about working with children. Experience in the sector demonstrates the knowledge, skill and commitment required along with its complexity. This contributes to turnover of non-qualified staff.

There is a shortage of Diploma qualified staff in the sector. This contributes to turnover as staff seek career opportunities with other employers as the sector has many small, single service employers.

Teacher Shortage (NSW)

Though NSW has had a regulatory requirement for university trained teachers in children's services for many years, there has been a shortage of appropriately qualified teachers over the last decade. This is particularly so in regional and remote locations where vacancies may be eventually filled with lesser qualified staff (with approval from the regulator). This shortage is likely to worsen even with a commitment to increasing the numbers of qualified staff through the quality agenda and framework and the National Partnership agreement with the NSW government. There are a number of contributing factors-

1. Pay Parity

Teaching is a profession in ECEC. There are comparable requirements upon undergraduate students at universities whether the qualification be for primary school education or EC. It can be argued that the requirements and responsibilities of the work subsequently performed once graduated and employed is probably greater for the teacher in an early childhood service than

⁵ These generally reflect those of schools.

their school-based peers. A further argument can be made that the teacher's role in ECEC is actually more demanding professionally with higher requirements regarding the development of curriculum and assessment on site, rather than being set out by a central education department. Though the level of complexity may not change with the introduction of the National Quality Standard (including the Early Years Learning Framework), in the short term there will be a number of years of significant reform. This, in an environment where university trained teachers are likely to be the identified 'pedagogical leader/s' in the service as required by the National Quality Standard^{vii}.

What is clear to practicing and prospective teachers is that the pay and conditions are not comparable between a teacher in a children's service to that of their peers in other parts of the education sector.

Some specific factors that contribute to this include -

a) Preschool Affordability/Funding (NSW)

Education for school aged children is supported by government funding at a much greater level than that in EC. In NSW in particular, the level of state funding support provided to community managed preschools has consistently been shown to be far below that of other jurisdictions⁶ whilst preschools provided by the Department of Education and Training are effectively supported at a much higher rate, resulting in significant differences in fees charged. Long Day Centres, whilst not directly funded, are assisted by the availability of the federal Child Care Benefit and Child Care Rebate to families. This is not available to state funded, community managed preschools.

Funding levels have meant providers (predominantly small, independent community run services) must either increase fees, or decrease costs, or both to remain viable, the latter being very common. This financial imperative has been a significant contributor in suppressing pay levels in what is effectively a 'user pays' system as compared to government funded schools and preschools.

The steady increase in preschool fees has meant fewer families have been able to afford to attend community managed preschools and have either accessed federally supported long day care (through CCB) where they can (for subsidised fees) or not sent their child/ren to any EC service^{viii}. This has contributed to lower enrolments at 'preschool' which has further negatively affected income leading again to increased fees. Capacity to pay has a greater impact on lower socio-economic and regional and remote areas. This effect is clear in NSW when comparing the number of children prior to school age accessing community based services, mostly 'preschools', to those accessing government funded 'preschool' provided via education departments in other jurisdictions.

⁶Council Of Social Service NSW, "Drowning Not Waving: NSW Preschool Fees on the Rise", Report, 2009, <http://www.ncoss.org.au/content/view/2022/98/>

The introduction of Universal Access (UA) funding to preschools in NSW⁷, while much needed and appreciated by preschools, has had more of a stabilising effect on fees rather than leading to any significant fee reduction and no effect on pay rates for teachers in preschools. It assisted arrest the income decline (in real terms) introduced in NSW when the government moved to the Resource Allocation Model of funding (RAM) which changed funding from licensed places to actual enrolments with its cap of a maximum of 2 days per week.⁸ The introduction of UA funds brought with it a change in the cap to 2.5 days (to reflect the 15 hour requirement) but this has significant practical difficulties for implementation whilst ever affordability remains a barrier.

A move to pay parity for teachers with that of their peers in other sectors of education, without a commensurate increase in government funding, would render many preschools unaffordable for the majority of families in their community with closures the likely result (as has already been the case), which would clearly undermine UA and the quality reform agenda.

Funding for regional and remote areas, though higher than for metropolitan areas, is not sufficient to facilitate services to provide the necessary incentives to attract and retain teachers.

b) Competition & Supply

Early childhood has been an open market for some time with no planning restrictions as to the number or location of centres. It has not been uncommon for there to be an oversupply of LDC places in some communities leading to lower occupancy levels which places cost pressures on a centre's operation. These pressures lead to a natural market tendency to keep costs low including limiting wage increases.

c) Teacher Status & 'Child Care'

The predominance of long day care centres in the sector has been a contributing factor in changing the public perception of ECEC. There has been a transition from the concept of 'education' when the sector was dominated by preschools to that of 'care', particularly with it continuously being tied to workforce participation, economic outcomes and assessment in relation to productivity. It is no surprise there is limited public knowledge of the importance of having highly trained professionals working with young children^{ix} in all settings. Though there is now strong research evidence supporting qualified professionals working with children birth to school age^{x,xi} this message still needs to grow outside the immediate sector.

⁷ It was the decision of the NSW government to apply the first round of Universal Access funding to preschools through its Resource Allocation Funding model

⁸ Children can attend for a greater number of days than the 'cap' but are funding for a maximum of 2.5 days (previously 2).

As part of the implementation of the NQA the government has set, as one of its objectives, to increase parent awareness^{xii} of the importance of quality ECEC and highly qualified educators to children's outcomes. It also recognises that parents may "view the benefits of child care in different terms to experts in the field".^{xiii} It acknowledges that the status of teachers in ECEC is not properly recognised outside the sector and needs to be addressed as part of these quality reforms.

d) Teacher Accreditation

School teachers in NSW are required to become accredited/registered with The NSW Institute of Teachers in order to teach in a school. The institute was formed as a result of the government's response to a review and taskforce report on teacher quality in NSW.^{xiv} Its purpose is described below-

"The institute was established to support quality teaching in all NSW schools. Its charter is to advance the status and standing of the teaching profession".

"The institute works to support the career long development of teachers and to assure both the profession and the community of the quality of teacher education programs".

The introduction of the accreditation system did not include ECEC teachers though their role and responsibilities are at least equivalent. ECEC teachers are still unable to be accredited by the Institute though there have been discussions on the inclusion of EC between the Institute and EC professionals including universities. There is little progress thus far.

The inability to become registered with the institute supports the perception that EC teachers are not of equal value to their peers teaching in schools.

These are structural deficiencies within the current system that need to be addressed to support parity, professionally as well as financially.

e) Conditions

Prospective teachers compare not only pay levels but working conditions across sectors. As most teaching positions that become available for new service teachers are in long day care, it is easy for them to make the clear distinction between the length of the work day (commonly 8 hours in LDC) and other conditions such as the availability of school holidays. This is a significant element in the predominant choice to take up primary teaching.

2) Career Choice

Teacher training courses in Universities commonly cover the ages of 0 – 12 offering students the opportunity to choose between employment in schools that commence at kindergarten or EC

services for 0 – school age. This provides choice for students and allows universities to combine students in core subjects and provide economies of scale for the training they provide, reducing the cost of provision. However, in the vast majority of cases in NSW this choice results in students choosing primary teaching once they compare pay and conditions between ECEC (particularly LDC) and schools. Subsequently, there is insufficient regular supply of ECEC teachers flowing into the sector.

3) Responsibilities

New service teachers and undergraduates in the ECEC sector, having once experienced or sampled the planning and administrative requirements teaching in ECEC, will commonly point to the responsibilities for curriculum planning and documentation as a further reason they choose primary teaching instead of EC, or later as a career change having previously entered EC. Directors regularly report their disquiet at the lack of reasonable time available for the management, administrative and relationship requirements of the role.

More Generally

1) University courses

- **Practicum**

- The limited amount of practical experience available in courses is not sufficient to assist students gain a sound understanding of the application of knowledge and skill required in practice. On the job experience with suitable mentors is an important part of professional development.
- Universities would report they have limited financial resources for course delivery that do not support additional or longer practicum placements.
- Universities can find it difficult to find the required number of services willing and able to take on the assessment and mentoring of students for practicum.

- **Governance/management**

CCSA notes that universities routinely cannot fit an appropriate amount of time into the course for subjects relating to management and leadership, thus exacerbating the difficulties for teachers in director roles in ECEC services

2) Teacher Costs Contribution Scheme (NSW) (Facilitated through UA funding)

CCSA supports the NSW government providing a contribution to services to assist the employment of teachers in ECEC. However, the proposed amounts of \$6,000 (3 year trained) or \$8,000 (4 year trained) are insufficient to close the gap that would provide parity with other teachers in schools. Employers are able to use these funds to assist recruit and retain teachers but this may not include increased pay rates. Further, the additional \$1,000 for remote services will also not be sufficient to provide incentives that overcome distance and location. The policy direction is correct, however, the level of support is inadequate to create real change.

3) Teacher Training

It is recognised that a 4 year course is important for a well-rounded teacher education program yet there are few incentives for current 3 year trained teachers to undertake additional study. In fact, the introduction of Modern Awards in NSW provides an increased barrier. There are no financial incentives available to address the course fees and associated costs of study⁹ and little financial benefit in regard to wages. The reward might be an initial increase in pay rate by a single step but both 3 and 4 year trained teachers will finish on the same pay rate. Those experienced 3 yr trained teachers who are already on the highest pay rate will receive no benefit at all. This is a shift from the previous award system that had a separate pay scale for 3 and 4 year trained teachers.

Federal cost offsets/incentives apply for employers in relation to Certificate III/IV and Diploma level training. Diploma students attending TAFE can complete their course for free through recent federal incentives. It is reasonable to think that, given that research has established a direct link between better outcomes for children and the higher levels of education of their teachers, realistic incentives for teachers should also be encouraged and supported financially.

CCSA has significant concerns regarding the change in direction regarding teacher training through the proposed availability of teacher training in the VET sector (TAFE). This completely contradicts the Universal Access objective of programs being provided by '4 year university trained teachers' which recognises the relationship between a higher level knowledge and skill and quality outcomes for children. Providing teacher training in the VET sector cannot be reconciled with the NQA policy outcomes and, in fact, clearly undermines them.

If the reason for this change was to provide increased access to teacher training, a better strategy would be to provide increased resources to universities for additional student numbers. Universities are the institutions that already have the necessary skills and knowledge to effectively provide appropriate degree-level teacher education programs.

If teacher education is to become available through TAFE it is reasonable to expect that it will be available to be provided by other RTO's. There is already significant concern in the sector about the academic rigour and quality of courses provided by some RTOs and about the lack of capacity of the system to effectively monitor the performance of RTOs.

Previously mentioned has been the issue of teacher status in the sector including the inability of NSW teachers to be 'accredited' as they are not teaching in schools. The NQA Regulatory Impact Statement acknowledges the objective of increasing the knowledge and understanding of the importance of quality ECEC and the role higher qualified staff play in its delivery. It follows that teachers need to be regarded as professionals in all settings. Teachers in schools are not able to train through VET institutions and neither should those in ECEC. A return to a non-university teacher

⁹ The 2008-09 budget committed \$12.4 million to reduce by about half the HELP debt of early childhood teachers who work in regional and remote areas, Indigenous communities and areas of high disadvantage based on postcode location

education system would be a retrograde step and cause Australian education systems to fall behind international standards and practice.

It is clear we need to ensure educators in the sector have clear career pathways. We need to provide for students who want to articulate in to a degree course. It also needs to be recognised that higher levels of study are not for all, and not everyone can reach the level of knowledge that is required. The challenge of providing quality ECEC for all children is not addressed by responding to issues of demand by designing strategies around increasing numbers alone. In fact, the quality of training courses needs to be improved and universities better resourced to provide it.

In NSW we have experienced the cyclical effect of status and standing of teaching in the ever decreasing entry requirements for students taking up undergraduate teacher courses. This correlates with relatively poor pay, conditions and status compared with other professions. High school graduates with higher scores gravitate towards higher paid careers. Teaching generally, and particularly ECEC, is often not perceived as an attractive career. The lower entry requirements that result articulates into students less able to meet the appropriate standards of competency and subsequently less capable teachers in the sector, an observation made more commonly in the sector in recent times. This will be exacerbated by offering teacher training by VET providers (see below).

Vocational Training

The requirement for all staff to have a minimum of Certificate III under the NQS provides an opportunity for expansion in the vocational training area due to the numbers that will be required. Vocational training is provided by both not-for-profit and commercial Registered Training Organisations (RTO). This issues paper correctly outlines that quality is variable. This is definitely CCSA's experience and the quality provided by some commercial RTO's is of particular concern, with fast-tracking and questionable levels of competency commonly reported. It also seems that the financial incentives built into the system encourage an approach that focuses on students merely being able to complete rather than acquiring the necessary level of skill and knowledge to be acquired. It is our view that this is a considerable risk without implementing a more rigorous quality assurance system to assess RTO's (including capacity to follow-up on complaints), implemented by professionals experienced in the sector.

It is relevant to note that Certificate III is entry level in the sector with component subject's part of the qualification pathway leading to the Diploma. It would make the pathway clearer, and improve the understanding of the sector from those not participating in it, to not generalise the language to the extent that certificates, diplomas and degrees are seen to be homogenous 'qualifications'.

The federal government recently introduced a policy to waive fees for students enrolling in the Diploma level course, seemingly to increase access to these courses and address an identified lack of supply. However, this was narrowly provided by limiting it to TAFE colleges only so did not respond to the broader supply needs in the sector. It is also evident through TAFE having a maximum number of places that can be offered through their system and is not accessible to all who would wish to take up the course in all locations. The availability of a range of RTOs providing on-site and distance

study does provide access to a larger number of participants. This benefit needs to be viewed through the lens of ensuring the training and assessment is sufficiently robust to ensure the required level of competence is achieved.

The shortage of Diploma qualified staff has contributed to concerns regarding the quality of some training. The ability of some students to complete a Diploma (and certificate) in a relatively short space of time, and with little practicum component, is of concern. It needs to be acknowledged that some current course providers are not requiring the study and practice components to be completed satisfactorily, particularly the Certificate III and Diploma. It is a common concern in the sector currently that there are too many individuals who have completed training and clearly do not have the knowledge and experience these courses are meant to provide. It is important that providers are assessed more rigorously than currently is required so that this situation is rectified and does not continue when we enter the period when the number of staff required to hold such training increases substantially. It is important that assessment of RTO's should occur by people with experience in the sector. It should be noted that there are quality RTOs that do expect the satisfactory completion of all components of these courses.

CCSA also notes the comment in the issues paper outlining concerns regarding the breadth of experience offered by certificate and diploma courses, particularly for students training at their place of employment, as part of a student's practical experience. CCSA agrees with this position and would include, as earlier outlined, the importance of gaining broad experience, across several settings, for all levels of training from certificate through to university qualifications.

CCSA acknowledges some staff who are currently untrained may not wish to gain the certificate qualification. It is important that quality learning occurs for all children in all settings and having all staff have at least the entry level certificate is an important component of this outcome. CCSA notes there will be staff with legitimate concerns in regard to completing training and there should be a system of significant professional support available to them, particularly for those from disadvantaged groups.

Modern Awards

The introduction of Modern Awards (MA) created great concern across the sector in NSW. The advertised rates across most levels and classifications of employees were lower than those in the previous NSW awards. Though pay rates were preserved for existing employees, associated changes to work conditions and complex transitional arrangements implemented over an extended period has added to the existing concerns regarding pay and status in the sector. The introduction simultaneously of MA's with the most significant and rapid reforms the ECEC sector has ever experienced has contributed significant concern in the sector and heightened issues regarding parity and value across the sector.

This has not been the outcome in all states due to the differences in each jurisdiction but needs to be considered in relation to future development of the ECD.

Services, and their staff, have also been impacted by imposed inflexibility in some areas of awards. An example is the application of entitlements such as the length of the working day and overtime.

The practical effect of this has been to increase costs to services and remove benefits to staff of flexible arrangements that impact on their families, though the intent was to improve this situation.

Government Policy

Generally government policy has not responded well to the value arguments regarding children's education in the early years, even after research has provided significant foundation for both the short and long term benefits to individuals and to society at large. The requirement of governments to view outcomes narrowly in economic and productivity terms and pay little attention to social benefit has contributed to successive governments considering ECEC in market terms and rely on the market to determine the type, placement and quality of services provided.

CCSA supports the National Quality Agenda and its recognition of both economic and social benefits of quality in the early years, albeit that the social benefit will also provide the foundation for longer term economic benefit^{xv}. The NQA recognises that the ECEC sector must be led, and driven by government, if these benefits are to be achieved and opportunities are to be provided for all children, rather restricted to only those children determined by market forces. Governments in all jurisdictions need to play an active part, individually and through COAG, to deliver a workforce that supports the NQA objectives.

History is littered with examples of how self-regulation and no regulation is ineffective. We have recent examples where treating EC as a commercial market fails both economically and educationally.

Career Progression

Trained staff, with either a teaching degree or diploma, typically move into management positions very early in their career in NSW. This occurs predominantly due to the shortage of trained staff in the sector but also because these positions attract higher pay in a sector characterised by comparatively low pay rates and where it has been possible to be employed with no qualification at all. This rapid progression provides very little opportunity to gain knowledge and experience regarding management from more experienced mentors.

Professional Learning

As many services within the sector are individual, independent services, professional isolation is a continuing challenge. Whereas teachers in schools are part of a cohort of teachers, EC staff may have little contact with others, particularly trained staff who need to continue to improve their knowledge and skills throughout their careers.

Opportunities to have regular access to other in the field or more experienced and knowledgeable professionals is often limited by the cost to the service to facilitate professional learning and mentoring across a broad range of areas. As outlined previously, this is often being limited to engaging with children and not cover the broader areas of service provision such as governance and management, engaging with communities, collaboration and partnerships.

It is important there be -

- opportunities to regularly connect with others in the sector,
- access to regular professional learning from skilled and knowledgeable professionals, both electronically and face-to-face,
- access to a broad range of training relevant to service delivery including governance and management.

Children with additional needs

New service teachers often do not feel capable of appropriately supporting the specific needs of children with additional needs and are frustrated by the insufficient funding available to provide on-site assistance for children with more substantial, sustained needs. It is not uncommon for these pressures to lead to less qualified and able staff being assigned to work with these children, leading to a situation of managing behaviour rather than the implementation of supportive programs by skilled staff.

ECEC staff also needs access to information and professional learning opportunities to improve their knowledge and skill in relation to quality inclusive practices and the broad scope of additional needs, including those emotionally and socially based. It is also necessary for there to be regular access to support agencies that support sensitive inclusion and family centred practice. This also needs to be supported by appropriate funding to facilitate staff developing and evaluating programs on a continuous basis and providing for more regular engagement with children with higher level needs.

For further information regarding quality inclusive practice CCSA makes reference to Early Childhood Intervention Australia.

Rural and Remote Services

Recruitment and retention of qualified staff continues to be a challenge for these services in NSW, particularly university trained teachers. Current funding arrangements do not always address the barriers to successful recruitment and retention where often incentives need to be provided to attract appropriate staff.

It would assist the provision and sustainability of regional communities to developing and/or extend models of provision such as mobile services and alternate governance structures that will provide sustainability for smaller communities such as clusters and multi-aspice. This will address, and likely significantly improve, the current workforce challenges.

It is important that children in these regions receive the same quality of service as their metropolitan counterparts if the NQA objectives are to be achieved.

It is not acceptable that children attending schools in regional remote have teachers but children in ECEC often do not.

Recognition by schools re EC teachers

Recent feedback in the sector indicates that schools which have employed early childhood educated teachers regard the contribution that these teachers make to the education offered by their school very highly. This supports the inclusion of specific content on child development and pedagogy for children birth-5 in teacher education programs.

Aboriginal and Torres Strait Islander and CALD teachers

It is essential to ensure that workforce development programs have the capacity to include specific education and support programs for these groups. It is not enough to simply say that they will be encouraged to participate in education programs. There is an apparently high level of incompleteness of teacher education programs in by Aboriginal students. Culturally appropriate teacher education programs need to include support for access to programs, flexibility in delivery and support following graduation.

Conclusion

CCSA supports the work of the productivity commission and welcomes the opportunity to contribute. Its position in the sector enables a significant understanding of the issues that will be addressed in the study. CCSA would welcome further opportunities to assist and support the work the commission is charged with regarding the Early Childhood Development Workforce.

Recommendations

Though the body of this submission gives rise to a number of improvements that can improve the development of the EC workforce a summary of some of the major recommendations follows-

1. Ensure professionals with university teacher training have pay parity with their peers and others have remuneration comparable to the value of the work performed.
2. Funding community-based preschools using a method that has, as its basis, having university trained teachers working in primary contact roles and provides affordable fees for families.(NSW)
3. Implement planning controls to ensure that the number and placement of centres meets community expectations, offers a level of choice for parents according to their needs and guarantees a quality experience for children. This system needs to recognise that educating children should not be subject to the same market forces as the setting up of a milk bar or butcher shop.
4. Ensure teaching training occurs only in universities and not by providers at a vocational level. This will likely mean facilitating an increase in the intake number of undergraduates.

5. Provide funding that supports an increase in the number of qualified staff required in the sector through providers that are regularly and rigorously assessed and accredited by skilled and experienced professional in the sector. This will likely include minimum times in which these qualifications can be completed and an increased amount of practicum experience.
6. Establish a system for the registration/accreditation of teachers employed in the ECEC sector.
7. Promote the value and ECEC and the components of quality ECEC through the media.
8. Increase capacity in governance and management through-
 - provide appropriate funding to support agencies with contemporary knowledge to provide specific training, information and on-going support to staff and management in organisations that includes governance structures and collaborative management.
 - Investigation/implementation and/or development of cluster/multi-aspice models with provision of appropriate levels of seed and recurrent funds.
9. Introduce funding levels for rural and remote communities that reflect the higher costs of service delivery to overcome the identified barriers to providing quality services including the provision of incentives.
10. Financial and professional support to increase the number of Aboriginal and Torres Strait Islander and Culturally and Linguistically Diverse students to access and complete university teaching training.
11. For government to acknowledge and support the contribution and extended social and community benefits of the not-for-profit sector, particularly community managed, and provide access to specific support regarding governance and management that will develop and maintain sustainability and therefore better workforce outcomes.^{xvi} This will include knowledge and information regarding 'Collaborative Management'.
12. The government establish a mechanism or body to ensure an integrated approach to the implementation of its reform agenda such as considering the NQA concurrently with its component parts such as Modern Awards.
13. Systematic professional support be made available for staff with legitimate concerns regarding completing certificate training.

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2011

End Notes

- ⁱ Productivity Commission Research Report, "Contribution of the Not-For-Profit Sector, Australian Government, 2010
- ⁱⁱ Heckman J., Ph.D. "The Case for Investing in Disadvantaged Young Children", First Focus, 2008
- ⁱⁱⁱ Matts, C. Paxton, P. & Nickolaion, N. "Collaborative Leadership and Collaborative Management" InfoQ online article, 2005.
- ^{iv} Dept.of Education and EC Development, "Review of Kindergarten Cluster Management", 2001 (pvii)
- ^v Examples- Illawarra Area Child Care, Children First Inc., Illawarra Children's Services (ICS), Galloping Gumnut Mobile Children's Services, Bourke Children's Services.
- ^{vi} Hayden, J. Hadley, F. & De Gioia (2005). "Social Capital, participatory management and community development: Sustaining a community in Blacktown", 2005
- ^{vii} COAG, "National Quality Standard for Early Childhood education and Care and School Age Care", Dec. 2009, Element 7.1.1 (p28)
- ^{viii} Comparisons can be made between census data re children in an LGA with NSW government data re attendance in ECEC services.
- ^{ix} Institute of Education, University of London, "The Effective Provision of Pre-School Education Project" (and the extension project), UK, 2004
- ^x Organisation for Economic Co-operation and Development, "Starting Strong II: Early Education and Care", Paris 2006
- ^{xi} Lally, R. "The Impact of Non-Parental Care on Infants & Toddlers", 2003
- ^{xii} COAG ECS Steering Committee, "Regulatory Impact Statement on ECEC Quality Reforms, 2009, (p9)
- ^{xiii} COAG ECS Steering Committee, "Regulatory Impact Statement on ECEC Quality Reforms, 2009, (p9)
- ^{xiv} "The NSW Government's Review of Teacher Education, Quality Matters" (Gregor Ramsey, 2000) and "The Report of the Taskforce on the Review of Teacher Education in NSW" (Jim McMorro, 2001)
- ^{xv} Heckman J., Ph.D. "The Case for Investing in Disadvantaged Young Children", First Focus, 2008
- ^{xv} Productivity Commission Research Report, "Contribution of the Not-For-Profit Sector, Australian Government, 2010, 'Key Points'.

Other References

1. OECD, "Starting Strong II: Early Childhood Education and Care", Paris, 2006
2. McCain M, Mustard JF and Shanker S (2007), *Early Years Study 2: Putting Science into Action*, York University, Toronto Canada. Council for Early Child Development,
3. Stuart Shanker PhD., "In Search of the Pathways that Lead to Mentally Healthy Children", *Journal of Developmental Process*, 3(1), 22-33. [pdf](#)