

# **Submission to the Productivity Commission**

# Early Childhood Development Workforce Draft Research Report, August 2011

Child Australia appreciates the opportunity to comment on the Draft Research Report on the Early Childhood Development Workforce. We are a diverse organisation with a long history of supporting the Early Childhood Education and Care sector. Since 2005, we have delivered professional support to the sector through the DEEWR funded Inclusion and Professional Support Program. Within that program, Child Australia is the Professional Support Coordinator in Western Australia (PSCWA) and the Northern Territory (PSCNT) and operates 6 of the 8 Inclusion Support Agencies in Western Australia. The PSC and ISA programs are funded to support Australian Government Approved Child Care Services (AGACCS).

In addition to these large and wide reaching programs, we run a number of smaller programs in Western Australia aimed at supporting the sector, and operate Child Early Learning Centre Lockridge, Lockridge OSHC in Western Australia and Bagot OSHC in the Northern Territory.

Our sector knowledge has been gained through programs that increase access, equity and capacity as well as through direct service delivery. For many years we were the peak WA organisation representing the interests of children with disabilities in the sector.

In general, we are highly supportive of the Commission's Draft Finding and Recommendations and applaud the direction and intent of the Report. This submission will comment specifically on Draft Findings, Recommendations and Information Requests that we consider critical to developing a robust ECEC sector, with specific reference to our jurisdictions (WA and NT) and scope of operation.

# **Draft Recommendation 3.5**

We strongly support this recommendation and consider that long term support for volunteer committees is essential to sustain a viable not for profit community based ECEC sector. Volunteer committee composition is not static and services frequently experience high committee member turn-over. As a result, committee capacity may be initially developed but not necessarily retained or sustained over time. Typically, committee members do not have ECEC training, do not contribute to pedagogical leadership and have limited awareness of contemporary sector issues and imperatives that impact both governance and service delivery. Management committee support needs to be targeted, specific and timely to promote strong governance and ongoing financial viability of services.

#### **Draft Recommendation 5.1**

Whist we appreciate the time lag associated with transitioning to improved qualifications, and agree that currently employed three year qualified early childhood teachers should continue to deliver preschool programs, we consider that they should be required to upgrade to a four year degree within a specified time frame.

# **Draft Finding 5.1**

- We strongly agree that the ECEC wage structure must deliver parity across jurisdictions and work locations (pre-school, long day care, school, etc.). We had hoped that that the Commission might make recommendations as to how this might occur. Until wage parity exists, attraction and retention of suitably qualified early childhood workers, particularly early childhood teachers, will continue to be an issue in our jurisdictions.
- Although waivers may be required in rural and remote areas, we believe they should be minimal in number and time limited. We would like to see specific recommendations to fund training delivery in rural and remote areas for qualifications to at least Diploma level, and more innovative training delivery that does not dispense with "face to face" contact. The costs of regional and remote training delivery for RTOs exceeds metropolitan delivery with the result that remote delivery and on-line strategies are increasing. In environments with limited positive role models and pedagogical leaders, remote delivery strategies do not necessarily provide the best outcomes nor directly translate to "good quality" training. Funding recommendations to support mechanisms for developing mentors and supervisors are critical to support effective workplace learning.
- Research on early childhood highlights birth to six years as a crucial period in children's development. Given this, we question why early childhood programs in Australia are not resourced at an equivalent rate per child as school based programs. Public perception and recognition of early childhood care providers would be likely to experience a positive shift if the pay and conditions of ECEC staff and the funding level of programs increased. This would assist with staff recruitment and retention.

# **Draft Recommendation 7.1**

We strongly believe children attending OSHC services deserve educators with a developed knowledge and understanding of middle childhood. Although OSHC is not focused on cognitive development, it does focus on other domains including language, social, emotional, psychological and physical development. We believe that children attending OSHC deserve educators who understand and respond to their developmental needs and who can program effectively within the Framework for School Aged Care. We would like to see greater emphasis on OSCH staff holding as a minimum a Certificate IV.

# **Draft Recommendation 7.2**

Many children in regional areas attend occasional care on a "regular" basis. We would like to see recommendations regarding staff qualifications for occasional care providers.

### Information Request – Characteristics of Inclusion Support Workers

We are concerned that the Report does not differentiate between the different types of inclusion support provided across ECEC settings. This lack of differentiation confounds the term "inclusion support worker". For AGACCS, there is also potential to confuse the Inclusion Support Facilitator role (who were previously known as Inclusion Support Workers) with the role of the additional worker funded by ISS.

In child care settings, there is no longer an "inclusion support worker". A successful ISS application may result in an additional staff member being employed to make a positive change to the adult to child ratio for a time limited period. This additional employee is not an "inclusion support worker" nor are they employed to work with or provide specific inclusion support for an individual child. Inclusion of all children is the role and responsibility of all educators within the child care setting. The entire staff team require the skills and knowledge to include children with additional needs, and to work in collaboration with early intervention/allied health/bicultural support professionals who provide information about and support for individual children.

The Inclusion Support Facilitator, attached to a regional Inclusion Support Agency, assists the child care service to identify, develop and implement strategies to include all children with additional needs, including collaborating with early intervention/allied health/bicultural support professionals.

This is a qualitatively different to having an inclusion support worker to support an individual child's participation in a mainstream setting.

#### **Draft Recommendation 8.1**

Note above comments about nomenclature "inclusion support worker".

We strongly support recommendations surrounding the current ISS process and funding levels particularly payment at market rates for the cost of the additional worker. We would like to see this funding extend beyond AGACC settings (which in WA would include State funded pre-kindys and occasional care settings) and for a greater span of daily hours.

Educators employed using ISS funding should be trained, experienced educators who hold, as a minimum, a Certificate III in Children's Services. Current ISS funding is a contribution to the cost of an additional worker with extra costs met by the service. Realistically, the likelihood of supplementary payment by the Service varies directly with their financial viability, and with management policies and beliefs about the need to employ trained and experienced staff. This impacts on the type of employee engaged by the service.

Many children with high and ongoing support needs are being excluded or offered places for restricted hours as services are unable/unwilling to fund the gap between ISS funding and required wage payments. This is inequitable and reduces access to universal services for children with additional needs. As a direct result, current ISS operation and funding decreases the potential workforce participation of families with children who have high and ongoing support needs. This is

arguably systemic discrimination. Child Australia is committed to ensuring equitable access to ECEC services for all children and to non-discriminatory practices.

### **Draft Recommendation 8.2**

Child Australia is somewhat confused by the intent of this recommendation as the PSC provides training and professional development for ISAs, IPSUs and AGACCs. Whilst we applaud the drive for additional funding for inclusion related in-service, the PSC currently provides in-service training and professional development for Inclusion Support Facilitators and ECEC educators including the additional workers engaged with ISS funding.

Child Australia recommends that the Productivity Commission reviews the findings of the PSC Alliance action research project entitled *Roles and Professional Support Needs of Inclusion Support Facilitators* available at <a href="http://pscalliance.org.au/wp-content/uploads/2011/Action-Research-Report-ISFs.pdf">http://pscalliance.org.au/wp-content/uploads/2011/Action-Research-Report-ISFs.pdf</a>

We consider that ISS funding which largely governs the employment of additional educators is the major limiting factor for their in-service training and professional development. Services need extra financial support to release of staff (including the additional ISS funded educator) for training during business hours AND employment of relief staff to maintain the required adult to child ratios (whilst other staff engage in training).

It is essential that the ECD workforce understands how to include ALL children. There is a prevalent yet mistaken belief that the ECD workforce requires a range of particular, special and different skills to work with children with additional needs. We believe that the needed skills and competencies are the same as those required to work effectively with ANY child and family. Child Australia, since 1987, has helped to include children with disabilities and, since the mid 1990's, children with additional needs, into mainstream child care settings. We strongly believe that all educators should, as part of their base training, develop competence to support the learning and development of all children. When including a child with additional needs, educators may require information/ advice/ resources/ training to build their knowledge and confidence; they may need to learn a new technique, or use specialist communication tools, language or culturally specific tools/aids. This growth in skills, knowledge and confidence should build on the educator's base training/qualification hence all ECEC educators should have or be actively progressing towards Certificate III (inclusive of RPL) as a minimum.

### **Draft Recommendation 9.1**

We believe there is a need for greater understanding that resourcing is just one aspect that impacts on attraction and retention of workers in remote areas and that working in remote communities presents workers with complex challenges that require skill and ongoing professional development to manage. Many incentive approaches will attract workers to remote areas but will not sustain them long enough to improve and positively impact on the community. Lateral thinking and innovative approaches need to be developed with a focus on community development to build the capacity of communities and contextual approaches to meet specific community need.

#### **Draft Recommendation 9.2**

Child Australia strongly endorses the need for adequate additional housing in remote areas. Lack of available, adequate and/or affordable housing in regional, rural and remote WA and NT severely restricts ECEC service delivery and wider human service delivery. It limits sector capacity to develop and implement innovative rural career development and secondment opportunities, or attract potential long or short term candidates. In the north of WA in particular, the labour market is very tightly driven by the demands of the resource and mining industries. Attraction and retention of staff is very problematic in these circumstances and made significantly worse by housing shortage.

#### **Draft Finding 10.1**

Child Australia is not convinced by this finding. The content of VET courses significant lags contemporary practice e.g. the current training package does not incorporate EYLF, FSAC and NQS. Our consistent feedback from services and ISAs over many years has been that a reasonable proportion of qualified staff (Diploma) have limited depth of theory or practical understanding of child development. We remain unconvinced that sufficient industry feedback is obtained to inform training package development and review, and that the lead time to update the training package leaves large gaps between required industry performance standards and competencies of new graduates.

### **Draft Recommendation 10.1**

We strongly support the introduction of minimum training and practicum periods for ECEC VET qualifications and oppose "fast tracking".

### **Draft Recommendations 10.2 and 10.3**

Child Australia in principle supports these recommendations but is cognizant of the additional costs that RTOs would incur to enact the recommendations. We consider it important to engage with and train FDC providers and CALD potential educators and encourage the Commission to make further recommendations regarding funding innovative VET training programs for these and other potential ECEC workforce target groups.

### **Draft Finding 10.4**

We fully endorse the finding that there should be nationally consistent tool to assess RPL in Children's Services qualification. We recommend that this finding be made a recommendation that incorporates a robust national RPL tool with assessor training to ensure the validity and reliability of the assessment. RPL is an excellent process when applied with rigour, however any assessment must evaluate both the quality of the candidate's prior experience and the expertise of persons providing third party verification. Our feedback from industry has repeatedly suggested that it is possible to "RTO Shop" to find a provider that will "sign off" an RPL assessment with limited evidence.

### **Draft Recommendation 10.4**

Child Australia strongly supports the requirement for VET trainer/assessors to demonstrate knowledge of contemporary policy and practice. We have long history of our in-service training being "different" to the learning resources and teaching provided to/received by students in the VET

arena. Our in-service training is informed by research and contemporary practice, and consistent with COAG policy and ECEC reforms. This is confusing for learners, and highlights gaps between the VET sector learning and contemporary practice. Child Australia acknowledges and applauds the work of high quality RTOs however has had regular and consistent demonstration that some VET trainers/assessors do not engage in the necessary professional learning to keep their knowledge, teaching and assessment practices current. DEEWR currently fund PSCs to support the professional learning of the ECEC sector. PSCs could extend their brief and provide training and professional support to VET assessors as a way to bridge the gap between VET and in-service training.

#### Draft Recommendations 10.5 – 10.7

Child Australia strongly supports any and all registration and monitoring processes that "raise the bar" for VET providers. We would further suggest that RTOs with sub-standard performance be ineligible to apply for funded places (e.g. productivity places).

#### **Draft Recommendation 10.8**

We support this recommendation. Professional development and support for all staff is crucial regardless of their qualification or portion of the sector they work within. The Commonwealth provides support for professional learning for LDC, OSHC and FDC staff through the Professional Support Coordinators (PSC). We believe higher levels of support should be offered to the ECEC sector and there should be requirements in service budgets to enable staff to ongoing professional development. There is a need for negotiation between state/territory governments and the Commonwealth regarding access to PSC Professional development for school based pre-schools as this portion of the sector is currently not within the remit of PSC funding, nor are private pre-kindys (in Western Australia). In addition, the occasional care services are also currently excluded from accessing PSC supports and a widening of PSC support to meet these needs would be welcomed.

### **Draft Recommendation 13.2**

The funding cycle for many family support programs often impinges on the development of quality, sustainable and stable programs so we strongly support the recommendation of implementing extended funding cycles for this sector. This is required at both a Commonwealth and state/territory government level.

# **Draft Recommendation 14.1**

We strongly support the inclusion of Indigenous focused services in the scope of the NQF with a structured plan and resourcing to support these services reach the National Quality Standard. It is a flawed approach to introduce blanket waivers for BBFs (as has been suggested in some DEEWR consultations) as these services represent the most disadvantaged groups in our community and are often in the most need in terms of support and lifting of standards. Waivers effectively exclude this part of the community from accessing quality services for their children.

### **Draft Recommendation 14.2**

We strongly support the focus on cultural competence and the need to meet standards as outlined in the NQS. However, it is important to recognise that cultural competence is greater than cultural awareness and underpins practices of inclusion for all children. It is concerning that this

recommendation is focused on Indigenous Cultural Competency Guidelines to the apparent exclusion of other CaLD communities which are increasing represented in Australian society.

## **Draft Recommendation 14.3**

Child Australia supports the prioritization of access and provision of quality services for Indigenous children as per our comments on 14.1. We particularly agree that yearly funding cycles for BBF services do not support quality practice and certainty for organisations supplying these services. The caveat here is that service provision MUST be thoroughly monitored to ensure that service provision is within guidelines and functional.

#### **Recommendation 14.8**

These functions are part of the existing IPSP program and should be currently delivered by IPSUs.

# **Integrated Service Delivery (Chapter 15) Information Request**

We note the Commission's request for further information and data about integrated service provision. We note that the integrated services research conducted by Charles Sturt University (2010) on behalf of the national Professional Support Coordinators Alliance has not been referenced in the Commission's draft report. This national Australian research study provides detailed information about the complexity of integration and includes a number of recommendations about supporting current and future provision for integrated service staff, including comprehensive information about leadership requirements. This report can be accessed at <a href="http://pscalliance.org.au/wp-content/uploads/2011/FinalCSUreport.pdf">http://pscalliance.org.au/wp-content/uploads/2011/FinalCSUreport.pdf</a>

We strongly support integrated family and children's services and believe that early childhood centres are an underutilised community resource. More efficient and effective delivery of child health and family support services could be achieved through co-location, collaboration and/or integration. We would recommend that government initiatives and funding be applied to support this service delivery model.

# Recommendation 15.3 & 15.4

Child Australia in its capacity as the current provider of PSC in WA and the NT support these recommendations as an extension of the ECEC sector. This is a matter of commonwealth commitment to integrated service delivery and the obvious flow on of supporting the professional development needs of the wider sector. As mentioned in 10.8, a broadening of the scope of the PSC Program would better support the professional development needs across all aspects of the sector.