

Early Childhood Development Workforce Study

Family Day Care Australia response to draft report



Foreword

Family Day Care Australia (FDCA) is a national peak body which supports, resources and advocates for family day care services. Our role is to resource and promote family day care services in Australia to ensure the strength and continued growth of the sector in Australia in the interest of high quality learning and developmental outcomes for children. Family Day Care Australia takes a rights based approach to all research, policy development and advocacy work it undertakes, underpinned by a strong commitment to the UN Convention on the Rights of the Child.

Family Day Care Australia welcomes the *National Early Childhood Development Strategy- Investing in the Early Years* and strongly supports the *National Quality Framework* as it provides a sound platform for the integration of care and education with a defined focus on quality outcomes for children.

However, as identified by the Productivity Commission's Early Childhood Development Workforce draft report, the introduction of the National Quality Standard (NQS), as well as other aspects of the broader National Quality Framework (NQF), will have a number of impacts on the family day care sector which will vary across jurisdictions.

Family Day Care Australia largely concurs with the findings relating to the family day care sector (Draft Finding 6.1 and 6.2), though would seek that the Productivity Commission provide a recommendation relating to both draft findings in the interest of providing the Australian Government sound advice to ameliorate potentially damaging impacts on the sector. FDCA also acknowledges that the Productivity Commission has outlined some significant points (relating to availability of flexible and affordable training options and the inclusion of teachers within FDC pedagogical leadership positions), though again, these need to be transposed into clear recommendations.

Family day care workforce priorities

Family Day Care Australia advocates that there are two central priorities in terms of the workforce needs of the family day care sector in order for it to not only meet the requirements of the National Quality Framework and its associated components, but for the sector to remain a viable, high quality and affordable early childhood education and care option for Australian families.

1. A coherent national support program is required for the FDC sector to be well resourced to attain the mandatory qualifications required under the National Quality Standard. This may include such measures as fee waivers for the Certificate III in Children's Services (already implemented for Diploma qualifications); tailored programs for CALD workers to successfully enter and remain in the FDC sector; and, flexible and affordable training options for those in rural and remote areas. The Productivity Commission has

acknowledged the need for flexible and affordable training options, though this should be converted into a clear recommendation that incorporates the aforementioned broader aspects of support required.

2. An ongoing, targeted support program is necessary to meet the requirements of the National Quality Framework as there is a significant gap between the minimum mandatory qualification levels of the NQS and the nature of the requirements of the NQF (key elements of which include the Early Years Learning Framework, a nationally consistent regulatory framework, and a new ratings and assessment system). This should be implemented through direct training and support. While the sector has some support through, for example, the various Professional Support Coordinators (PSCs), this is not coherently targeted and the capacity of the PSCs is variable.

The Federal Government has underestimated the levels of support that will be needed for the FDC sector to meet the requirements of the NQF. FDCA believes the Productivity Commission should acknowledge the need for a coherent support program for the FDC sector within the final report through a clear recommendation. The draft report makes indirect reference to this need a number of times (for example, through the reference to the 'desirability' for degree trained EC teachers to fulfil the role of the required position of a pedagogical leader within each scheme), though amalgamation of these points into a recommendation for a broad and coherent sector support program is necessary.

Ratios, cost increases and sector attrition

Draft finding 6.1 states:

To achieve the National Quality Standard, contact worker-to-child ratios for children under school age will increase in New South Wales, Western Australia, Tasmania and the Northern Territory. These changes are likely to lead to cost increases for family day care services in those jurisdictions, which may result in fewer children attending.

For the above jurisdictions, family day care educators (contact workers), in order to lessen the financial impact of the increased educator to child ratios, will need to raise fees for their services to remain financially viable. This may lead, in some cases, to prohibitive costs for some families. FDCA would recommend that the Productivity Commission provide a similar recommendation to that of *Draft Recommendation 3.2*¹ to be linked specifically to the recommendation associated with *Draft Finding 6.1*.

The Productivity Commission's assertion that the commencement of the new qualification and ratio requirements under the NQS will not significantly impact on the number of FDC educators may be somewhat inaccurate. Due to a range of issues such as the ageing workforce within the sector (see 2010 National ECEC Workforce Census), reluctance or inability to undertake formal qualifications due to high costs (noted on p.101 of the draft report) and impacts on income, there may

¹ **Draft Recommendation 3.2:** *To achieve the goals of the Council of Australian Governments' (COAG) ECEC reforms without disadvantaging low-income families through the anticipated increase in fees, governments will need to ensure that there is adequate financial support for such families.*

be a notable level of attrition within the FDC sector. FDCA believes this could be somewhat offset by a recruitment support program to assist persons from Culturally and Linguistically Diverse (CALD) and Aboriginal and Torres Strait Islander backgrounds to enter the FDC sector. If the Federal Government supported the implementation of a targeted recruitment strategy through more universal language, literacy and numeracy (LLN) programs (for example, through a broadening of scope of the Workplace English Language and Literacy [WELL] program) that lead into Children's Services qualifications, then not only could attrition levels be somewhat mitigated, a range of inclusion and workforce participation targets could be met. As noted within the draft report, about a quarter of FDC contact workers are from culturally and linguistically diverse (CALD) backgrounds (DECS 2010) and FDC "is a way for individuals (mainly women) to become economically independent and can be a valuable pathway for women from Culturally and Linguistically Diverse (CALD) backgrounds (sub. 66, p. 7)".

Scheme financial viability under the National Quality Standard

Draft finding 6.2 states:

The National Quality Standard may result in fewer children attending family day care, and hence lower revenue for family day care schemes. In the case of the most marginal family day care schemes, coordination unit revenue could potentially decline below the minimum threshold required for ongoing operation of the scheme.

For those jurisdictions where the ratio change may lead to a decline in the total number of children attending services, the draft report acknowledges that there will be three significant impacts for these services:

1. Reducing the number of children in FDC directly impacts coordination unit income.
2. Coordination unit revenue could potentially decline below the minimum threshold required for ongoing operation of the scheme.
3. The reduction in income may in turn reduce the capacity of the coordination unit to achieve quality improvements in the scheme.

The fundamental function of the National Quality Standard is to ensure that children within ECEC services receive the best possible quality learning and developmental outcomes. If a central impact of the implementation of the NQS leads to a decline in the capacity of coordination units to facilitate this desired outcome (or indeed, the demise of the scheme), then the NQS is drastically undermined.

The above impacts could be minimised simply through the Federal Government ensuring that funding levels for coordination units remains stable. FDCA advocates that the Productivity Commission make a recommendation that funding levels for schemes (particularly 'marginal' schemes) are closely monitored and that provision be made for increases in operational support funding levels (through the Community Support Program) if required.

FDC pedagogical leadership positions

The draft report notes that “pedagogical leadership by teachers employed in FDC coordination units is desirable for the delivery of the Early Years Learning Framework (EYLF).” FDCA concurs with this position and would advocate that a strategy to encourage FDC coordinators to undertake degree level qualifications (for example, through either fully or partially funded scholarship programs) form part of a broader recommendation for a sector-specific support program to meet the many challenges and requirements of the National Quality Framework. As mentioned in FDCA’s previous submission, the family day care sector has highlighted the inclusion of more four year trained teachers as part of the sector’s five year strategic plan. While there are many existing four year trained teachers working within family day care, it is anticipated workforce development requirements will demand a significant increase in this number.

Conclusion

FDCA believes that through Early Childhood Development Workforce study, the Productivity Commission is in a unique position, at a crucial time, to advise the Federal Government on the workforce development needs of the family day care sector. If the call for recognition of the need for the aforementioned coherent support structures is heeded, the family day care sector will be a more productive, effective and financially viable sector that will meet the challenges of the National Quality Framework and facilitate the best possible developmental outcomes for children.

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Correction required:

Page 95 states:

"The NQS requires that all FDC contact workers either have or be working towards a Certificate III in Children's Services by 1 January 2014, while coordinators will be required to either have or be working towards a Diploma of Children's Services."

The National Quality Standard requires FDC coordination unit staff have a Diploma level qualification in Children's Services by 1 January 2014, rather than "have or be working towards" such a qualification. FDCA requests this amendment prior to publication of the final report (see *National Quality Standard for Early Childhood Education and Care and School Age Care*, p.21).