



**Government
of South Australia**

**Submission on the Productivity
Commission Draft Research Report on
the Early Childhood Development
Workforce**

Table of Contents

Overview	3
Education and Care Services National Regulations Transition and Savings Strategies.....	4
Supply of Workers with Certificate III and Diploma qualifications	4
Outside School Hours Care	4
Occasional Care	5
Workforce Information.....	6
Funding.....	6
Quality of ECD skills development.....	6
Course content and delivery	7
ECD Workforce for Aboriginal Children.....	8
The Integrated ECD Services Workforce	8
Leadership in Integrated Services.....	8
Workforce for Children with Additional Needs.....	9
Child Health Workforce	9

Overview

The South Australian Government welcomes the opportunity to provide comment on the Productivity Commission Draft Report on the Early Childhood Development Workforce.

The South Australian Government has long recognised the critical role of the early childhood development (ECD) sector in contributing to the health and development of South Australian children. South Australia has led many reforms in this area, including national reforms such as the Engaging Parents in the Early Childhood Development Story project, and leading best practice in integrated services through Children's Centres for Early Childhood Development and Parenting.

The South Australian Government agrees with the general intent underlying many of the recommendations of the draft report. The report highlights many key opportunities and challenges arising from the National Quality Agenda implementation, as well as recognising the importance of ensuring that staff delivering these services receive adequate training and professional development to deal with the complex requirements of children in their care.

It is noted that there are a number of other workforce studies being conducted by the Productivity Commission that are pertinent to the findings and recommendations of this report – especially in light of the move to more integrated service provision for the clients of early childhood services.

Rather than deal with each recommendation individually, this submission has synthesised comments around a number of key headings and will refer to specific recommendations as needed. This submission also contains information in response to the Productivity Commission's requests for further information on the occasional care and outside school hours care workforce.

Education and Care Services National Regulations Transition and Savings Strategies

The draft research report does not comment on transitional and savings strategies that have been developed in response to the proposed Education and Care Services National Regulations which may mitigate costs to early childhood development service providers.

In South Australia, the Department of Education and Children's Services (DECS) is developing criteria for the classification of early childhood teachers based on qualifications, as well as current and previous experience, to implement the proposed national saving provision for teachers. This means that teachers employed in early childhood education and care services for the period 1 January 2010 to 1 January 2012, or who have jurisdictionally recognised early childhood teaching qualifications, will be taken to be early childhood teachers.

Supply of Workers with Certificate III and Diploma qualifications

In its initial submission to this inquiry, South Australia reported that the new national reforms will particularly impact on child care workers (Certificate III) and Early Childhood Workers and Schools Services Officers who work with children in preschool programs in this State.

Since the initial submission was made, the Department of Further Education, Employment, Science and Technology (DFEEST), which is responsible for the provision of vocational education and training in South Australia, has changed its User Choice policy to subsidise existing workers who undertake a Certificate III in Children's Services under a traineeship arrangement. This will assist in meeting the costs of up-skilling the ECD workforce.

Outside School Hours Care

Current Qualification Requirements

Under the proposed Education and Care Services National Regulations it has been agreed that, for Outside School Hours Care (OSHC) services, existing State and Territory minimum regulatory standards relating to staff qualifications will continue to apply after the commencement of the National Quality Framework. These regulatory standards will remain in force until such time as national agreement on qualification requirements and approved qualifications is reached.

Existing qualification requirements for South Australia are based on the National Standards for OSHC and have been in place since 1998. These remain appropriate, with one qualified staff member to every 30 children in care. The range of approved qualifications is varied enough to recognise the particular nature of the school age care environment as recreational, as distinct from the early childhood education or formal schooling environments. Compliance with the Standards has been compulsory for services operating on DECS sites. A

voluntary code of practice for compliance was recommended for all other OSHC services.

Minimum qualifications for OSHC services

The South Australian Government advocates for maximum flexibility in the scope or type of qualifications approved for OSHC services, so that staff are best able to provide a wide and diverse range of developmentally and recreationally appropriate programs for school age children, reflective of the *My Time, Our Place - Framework for School Age care in Australia*.

South Australia would not support the introduction of a minimum single qualification for educators in OSHC (e.g. Certificate III). This would reduce flexibility and increase costs to services, which would no longer be able to use specialised staff such as community artists or fitness instructors within their staff to child ratios. In this context, recommendation 7.1 is supported.

The South Australian Government recommends that a list of appropriate qualifications suitable for working with school age care in a recreation and leisure environment is identified nationally, as these qualifications currently vary greatly between each state and territory.

Occasional Care

Occasional Care Workforce

In South Australia, the major supplier of occasional care is DECS. The care program is provided in government funded preschools and Children's Centres for Early Childhood Development and Parenting as an integrated service. Staff are government employees and, as such, are employed as Early Childhood Workers Level 1 or 2. Staff are employed under the *Children's Services Act* or *Education Act* and are paid at salaries at rates above those of a childcare worker. The first worker in the program is required to have a Diploma in Children's Services, or be working toward one, however subsequent workers are not required to have a qualification although the first worker is required to be present at all times during the session.

Mandatory Qualifications in Occasional Care

Recommendation 7.2 states that governments should not impose additional mandatory qualification requirements on occasional care workers, given that children generally spend little time in occasional care. To accept the draft recommendation in South Australia would be lowering the existing standard (described above).

Legal advice has been received that the National Law will not distinguish programs that are operating at a site. If one program is in scope then all other programs operating at the site are also in scope, which means the DECS occasional care program will need to be assessed as part of the preschool service.

Workforce Information

It is difficult to determine the demand for ECD services as it is influenced by a wide range of factors including levels of workforce participation and national policy and funding arrangements. Therefore, the South Australian Government supports recommendations directed at gathering and publishing additional information and evidence (3.3, 11.2, 12.1, 13.3, 15) to inform the analysis of the likely demand for workers and training services.

At present, the SA Government, through the Department of Further Education, Employment, Science and Technology (DFEEST), uses publicly available data (available through the Australian Bureau of Statistics, the National Centre for Vocational Education Research, Productivity Commission, Department of Education, Employment and Workforce Relations, Department of Education and Children's Services) to assess workforce requirements into the future since they are the most comprehensive and consistent.

DECS has been working to improve the early childhood education and care workforce qualifications data maintained in its Human Resources and Workforce Development system. There are now processes in place to ensure that qualifications data is recorded when new early childhood teachers commence employment with DECS.

DECS has also undertaken some additional analysis in relation to the early childhood education and care workforce, including a *Career Intention Survey of the over 45 Permanent Teacher Workforce* and preparation by the Australian Bureau of Statistics of a *Labour Market, Demographic and Education Profile of the Early Childhood Labour Force and People with Early Childhood Qualifications in South Australia*. This additional information will enable more specific profiling of the workforce to be undertaken.

Funding

Under the Skills for All reforms being implemented in South Australia and led by the Department of Further Education, Employment, Science and Technology, there is the capacity for funding for training to be directed to areas where demand is greatest. Whilst there are some restrictions as to eligibility of the learners and to the courses that fall within the Skills for All policy framework, it is not envisaged that the funding available for the ECD workforce would be any less than is currently available.

The Skills for All policy also recognises and compensates providers delivering in the regions (9.1) and delivering to particular cohorts.

Quality of ECD skills development

A number of recommendations touch on the quality of the training delivered to existing and prospective ECD workers. By implication, this will be related to the quality of the training and assessment staff (10.4, 10.5, 10.6).

Additional professional development of Vocational Education and Training (VET) assessors (10.4) will have resource implications for the state and for the early childhood education and care (ECEC) providers and their workers.

Some of the issues raised in relation to the capacity of the system to deliver quality outcomes have relevance to the VET system in general and not just the education and training of the ECD workforce. More stringent monitoring and evaluation of services beyond what is currently being offered will have resource ramifications for the Australian Skills Quality Authority.

Course content and delivery

There are recommendations that touch on the content and delivery of education and training courses (9.1, 10.1, 10.2, 10.3, 13.1, 14.2 cultural competency).

Role of the Skills Council

Recommendation 10.1 calls for the Skills Council to specify the minimum periods of training and practicum. It has not been the role of the National Skills Councils to specify such matters, which are largely addressed in the funding, teaching and learning strategies developed in consultation with the training providers and industry representatives.

However, the National Skills Council may have a role in providing guidance around work experience and work placements by, for example, developing checklists for students and employers when working with the registered training organisation (RTO).

ECEC training for workers from culturally and linguistically diverse backgrounds

Recommendation 10.2 calls for the development of language training programs to be delivered for contact workers from cultural and linguistically diverse backgrounds in conjunction with ECEC training. It may be sufficient to develop and deliver skill sets to such workers in conjunction with the qualification.

TAFESA which is a public provider of vocational and higher education and training, offers a program where dual qualifications are achieved, English Proficiency and Children's Services.

Cultural Competency Standards

The concept of co-delivery could be extended to Recommendation 14.2 which refers specifically to the need for ECEC services to meet cultural competency standards. The proposed guidelines on Aboriginal cultural competency will have implications for the content of relevant training programs which could similarly be co-delivered by providers.

In the context of the two other education and training workforce references (VET and schools workforces) it would be appropriate to consider better coordination, alignment and development of national cultural competency frameworks and

professional development about Australia's Aboriginal and Torres Strait Islander people for all workers in the three sectors. Such a systemic approach may also have benefits in raising the awareness of workers in these sectors on how they interact with students and families from culturally and linguistically diverse families.

ECD Workforce for Aboriginal Children

Chapter 14 of the report notes that Aboriginal and Torres Strait Islander focused services often have poorer infrastructure and resources, and fewer qualified staff, yet many of those services will initially be excluded from the National Quality Standard (NQS). As a result, as the NQS is applied to mainstream services, the gap between the quality of mainstream services and those for Indigenous children is likely to be exacerbated.

The South Australian Government is aware of this risk and is taking steps to ensure all services are equitably covered when the new system commences. South Australia is proposing to develop a single regulatory agency responsible for the registration and regulation of all education and early childhood services birth to the end of schooling under a recast Education and Early Childhood Services Act. It is proposed that prescribed early childhood services in South Australia which are not within the scope of the national law initially, but which will move into the national system in the future, will come within the applied law in South Australia as modified. This means they will require an approved provider and a service approval, but will not be required to meet the National Regulations. They will instead have to meet State regulations which will be developed in consultation with the sector. It is envisioned that budget-based Aboriginal focussed services in South Australia will be within this group.

The Integrated ECD Services Workforce

South Australia has led the way in integrated approaches to service delivery through Children's Centres for Early Childhood Development and Parenting. These centres provide access to child care, education, health services and family support for children from birth to eight years and their families. They are staffed by multidisciplinary teams, including teachers, child care workers, community development coordinators, allied health workers and family services coordinators. Visiting services are also provided to support early childhood development outcomes, including health promotion, child and family health services, primary health care services and parenting programs.

South Australia recognises that the challenge of developing an ECD workforce requires the development of new qualifications and career paths, the further development of inter-disciplinary practice and cultural change to support this.

Leadership in Integrated Services

Integrated early childhood development settings pose new concepts, contexts and challenges for early childhood leadership. Leaders of integrated early childhood development settings have requirements for operational leadership and

management, and pedagogical leadership in a multidisciplinary context. Leaders require skills in leading and developing a strong and cohesive multi-disciplinary team, recognising and responding to the strengths and needs of children, families and the community, to enhance child and family learning, health, wellbeing and resilience and to operate financially viable businesses. Effective multi-level leadership is required to lead integrated services and to accommodate all aspects of the service planning, development and implementation. Within this context, draft recommendations 15.2, 15.3 and 15.4 are broadly supported.

Workforce for Children with Additional Needs

A focus on integrated services is also critical in supporting children with disabilities or additional needs when accessing early childhood development services. Chapter 8 makes reference to the various professional disciplines, including allied health professionals that provide early intervention support for children with disabilities or additional needs. Providing these services as part of a broader coordinated response that integrates both universal and targeted approaches ensures that the needs of this cohort group are meaningfully addressed. This involves coordinated case management, coherent service pathways and ongoing training, support and capacity building for mainstream staff to provide high quality services to these children.

Child Health Workforce

South Australia offers in principle support for the draft recommendations around the child health workforce.

Scholarships for postgraduate studies in child health

Recommendation 12.2 considers the roll out of scholarships for postgraduate study in child health nursing. South Australia would support this recommendation as there are difficulties in retaining staff in geographical areas both in the metropolitan and rural areas. Scholarships could be available in difficult to recruit areas as incentives.

Increasing the number of tertiary institutions that provide education in this area may attract more nurses. In addition, more than one University providing this course in South Australia would support a more even spread of educational choices.

Child health nurse qualifications

In recommendation 12.3, the Productivity Commission states that child health nurses should not also be required to have midwifery qualifications. In South Australia, current continuity of care midwifery models ensure that mothers and infants are supported up to six weeks postnatal. To support continuity of care, breastfeeding and complex clients, South Australia believes that midwifery qualifications are desirable but not essential for child and family health nurses, who otherwise may experience difficulty engaging families after six weeks.

Consideration could be given to developing additional modules in the child and family health nurse curriculum to address complex family issues such as drug and alcohol use, domestic violence and child protection.

Access to child health nurses

The SA Government agrees with recommendation 12.4, which states that where children are unlikely to have access to a child health nurse, other health professionals, such as remote area nurses and Aboriginal health workers should receive training in child health.