

Report for the Productivity Commission
Monash University

Dinah Humphries (Coordinator, Children's Services, Family and Child Care)

Further to our conversation on Monday 2nd March, 2009. Please find following some additional comments and reiteration of our discussion.

(Please excuse the brief nature of this report as it is already post closing date for submissions)

- Blurred boundaries between various jurisdictions ie State Regulations and National quality assurance processes (National Childcare Accreditation Council – NCAC). Eg food safety requirements of local government, state regulations, quality assurance and other programs such as Start Right, Eat Right, which are voluntary programs but value add to services.
- Cultural perspectives regarding what is appropriate for particular children, staff, families within a specific community. The requirement to meet the individual needs of children (NCAC) and the requirement to meet regulations (DEECD) can be different. Eg appropriate sleeping facilities for children; cots / beds vrs slings / hammocks for recently arrived / refugee children.
- Individual interpretation of regulations can be an issue when it comes to implementing appropriate practice. Eg supervision in sleep rooms is an ongoing battle between DEECD representatives and children's services. Regulations require adequate supervision of children sleeping. Some DEECD representatives interpret this as requiring a staff member to sit with sleeping children at all times. This is not necessarily how children are supervised in the home environment and creates impractical ratios for centres to maintain, as that staff member is effectively "off the floor".
- Meeting reporting requirements for CCB can be difficult, as information is required to be stored for various amounts of time, which can again be different from the state based regulations. This provides storage issues for centres.
- There is little impetus for services to meet above basic satisfactory standards of regulation and/or quality. Services that strive for high quality accreditation with NCAC spend their own time and money achieving these ratings that are generally not actively used in promotion of the centre. This may include; maintaining staffing levels over required ratio, paying staff bonuses, supporting additional staff professional development, maintaining excellent standard of equipment and programming (additional excursion and incursions), maintaining excellent standard of food provided, allowing more than required time for staff programming etc. These efforts to reach higher than required standards are generally based on a philosophical commitment of the service to children and children's early learning and development. This philosophy is generally led by the Director or Coordinator of the service, and depends on their level of education and experience, and the pedagogical leadership skills. Obviously, the commitment to a higher than required standard of care, education, programming and staffing in a centre costs money, and is therefore difficult for centres to provide if they are a for-profit service. In summary, there are no Commonwealth or State incentives to provide higher than approved standard quality of care and education in centres, therefore this becomes a philosophical and budget driven decision, not necessarily considering the current research regarding what is best practice for children in their early years.
- Where profit is not the driving factor, say for example in some community based services, one of the factors influencing the standard of care and education provided in a service is the level of education and training of staff and the pedagogical leadership skills of the director / coordinator. Childcare is one of the most poorly paid professions and the conditions can be quite abysmal for staff. Attracting and retaining an appropriately trained workforce remains one of the most difficult issues the sector faces. Where there is distinct lack of pedagogical leadership and an inability of behalf of the director of a service to influence staff and parent management committees, this can

impact the service in terms of quality. This may be the case particularly in some limited hours / short-term care licensed services, where the commitment to and awareness of the research implications for practice regarding the learning and development of young children in care may not be present.

- A large part of the regulatory and quality assurance burden comes in from time management for services. Where the budget does not support time off the floor for staff to complete the required documentation, not to mention the additional documentation that may be required to achieve a higher than satisfactory result, the bare minimum is maintained.

In summary, in the children's services sector, there is a regulatory burden placed on services where state and federal requirements overlap; where specific regulations are open for individual interpretation and misinterpretation; where there is no incentive for services to meet above standard requirements in the quality of care and education they provide for children and families, where there is a lack of training, education and pedagogical leadership, and where budget not quality is the over-riding influence on operational decisions made at the service.