Submission to the Taskforce on Reducing the Regulatory Burden on Business

Dear Ms Wales,

Thank you for the opportunity to contribute to your review of regulatory requirements and the burden these might place on business. We are pleased to take up this opportunity by drawing your attention to issues faced by early childhood teachers working in long day care centres across NSW.

Please find attached a conference paper which highlights the key findings and issues raised from an Australian Research Council funded study conducted by Macquarie University. This study is investigating how early childhood professionals perceive the regulatory environment to impact on their professional practice and provision of quality care.

Our study participants overwhelmingly support regulatory accountability. Nonetheless, as our findings show, participants identified the regulatory environment, most notably the NSW Children's Services Regulation and the Quality Improvement and Accreditation System to have an unnecessarily burdensome impact on their centres. In particular,

(i) Paperwork requirements were perceived to be excessive and repetitive, and also led to many feeling that fulfilling these requirements took them away from their core work, teaching and caring for children.

(ii) The contents of these requirements, and/or how they were interpreted by reviewers from regulatory bodies, was perceived to be overly prescriptive and undermined the professional autonomy of early childhood teachers. In turn, this was seen to stifle innovative, quality practice.

As our study also found, these 'burdens' have the potential to incur further costs on individual centres and the childcare sector as a whole. That the compliance burden is perceived to be so great, and not commensurate with employment conditions (most notable, salary), can contribute to the high rates of staff turnover and the recruitment and retention difficulties currently facing the sector.

We are currently in the interview phase of our study, teasing out possible ways forward whereby the intent of the regulatory environment could be more effectively achieved. Participants have consistently called for the need of more supportive, collaborative partnerships to be built between services and reviewers. The intensity, complexity and frequency of change embodied in the regulatory environment mean that early childhood teachers are looking for greater practical, professional support that also demonstrates a respect for and an understanding of early childhood education and care.

In particular, our interview data to date suggests that a revision of the QIAS system as per the following model would do much to address the issues identified in our study. Key features of this model would include:

- QIAS to operate at a regional level with an experienced, teacher trained, mentor type figure coordinating the region;
- Regular network/support meetings held with representatives from all services in that region;
- Trusting, collaborative relationships develop both across the region and with this NCAC co-ordinator;
- Centres of excellence are identified and recognised within each region;
- Co-ordinator and representatives from these centres of excellence provide additional, ongoing support to those centres requiring, or identified as needing, further input. These centres are also monitored more closely.

It is our view that such a model would reduce prescriptive interpretations of quality; tailor regulatory obligations to innovative, purposeful professional practice; allow for informed, professional judgements to be shared/made; and reduce the 'fear of failing accreditation' mentality that can develop in staff and which can lead to over-documentation.
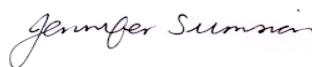
Finally, we commend the Federal Government's commitment to early childhood and the provision of quality, long day care services. We would like to make the point however, that participants in all phases of our study highlighted the need for additional government funding to make compliance less burdensome. For example, having the funds to employ additional staff would allow for a service to more effectively meet its compliance obligations whilst not compromising on its quality standards of care to do so.

Once again, we thank you for the opportunity to have input into this review process, and we look forward to hearing your findings and recommendations in due course.
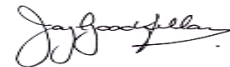
Regards,

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FEN05022

Working by the rules: Early childhood professionals' (dis)satisfaction with the regulatory environment

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Introduction

This paper draws on **findings from an ARC funded doctoral study aimed at investigating how early childhood professionals working in long day care (LDC) centres in New South Wales perceive the regulatory environment to impact on their professional practice and provision of quality care.**

In this paper, we will
- present survey findings and focus group data concerning early childhood professionals' perceptions of, and level of satisfaction with, the regulatory environment; and
- outline some theoretical ideas that are guiding our thinking on the implications these findings might have for policy and practice.

By 'regulatory environment' I mean "all legislation and regulation affecting children's services, whether or not it is specific to children's services" (Commonwealth Child Care Advisory Council, 2000, p. 2). As you would be aware, **two accountability frameworks are at the forefront of this regulatory environment:**
- **the NSW Children's Services Regulation** (NSW Department of Community Services, 2004), which aims to ensure that minimum structural standards are met across all services; and
- **the Quality Improvement and Accreditation System (QIAS)** which, in addressing process quality variables, is promoted as building on the base level quality set by state regulations (National Childcare Accreditation Council, 2005).

Collectively, **early childhood professionals working in LDC are currently required to comply with over 40 legal and other regulatory requirements**.

Significance of the issue

We believe that it is in the interests of children and their educators to consider how satisfied early childhood professionals are with this regulatory environment.

Census data (Commonwealth of Australia, 2005) shows that the number of children in LDC has increased from 301,540 in 1999, to 367,140 in 2002, and 383,020 in 2004. International research suggests these children are likely to receive quality care if their respective centres are those that, amongst other factors, adhere to regulatory and accreditation requirements (eg., Phillips, Mekos, Scarr, McCartney, & Abbott-Shim, 2000; Phillipsen, Burchinal, Howes, & Cryer, 1997; Whitebook, Howes, & Phillips, 1990; Whitebook, Sakai, & Howes, 1997).

However, very little Australian research, or even commentary, on the impact federal and state regulatory requirements have on professional practice and quality care, is available. Indeed, what has been written (eg., Grieshaber, 2000; Grieshaber, 2002; Hatch & Grieshaber, 2002; Shepherd, 2004) is largely embedded in critical theory and is at odds with what government discourses purport to be the benefits of regulatory accountability (Fenech, under review).

Whilst positive in intent, **the mounting anecdotal evidence that prompted this study suggested that the regulatory environment is detrimentally affecting early childhood professionals' professional practice and their capacity to provide quality care**. **We know that the sector is marked by high turnover rates and recruitment and retention difficulties** (Department of Employment and Workplace Relations, 2004; Lyons, 1997; Ryan, 1988; Warrilow, Fisher, Cummings, Sumsion, & a'Beckett, 2002; Whelan, 1993) – all of which threaten quality standards of care – **and we wonder about the place of the regulatory environment in this.**

Our study

This study investigated the perceptions of early childhood professionals working in NSW LDC centres. Giving voice to these practitioners underpinned our methodology. We deliberately sought to provide opportunities for early childhood professionals to make their perceptions of the regulatory environment known, and to position them as "activist professionals" (Groundwater-Smith & Sachs, 2002), acknowledging and respecting the agency they have to inform policy formation and review processes.

A three phase, mixed method research design was adopted:
- A **state-wide survey** (distributed to 1683, or 94%, of LDC centres across NSW)
- Seven **focus group discussions** (6 held in Sydney, 1 in a regional city)
- **Individual in-depth interviews** (16 participants)

Respondents were eligible to participate in the study if they had a university teaching qualification and were working in a position that involved both management and teaching responsibilities.

The data collection phase of the study took place prior to the introduction of the 2004 Regulation and the 2005 Accreditation system. Nonetheless, we believe that findings are still pertinent given that the issues raised have not been specifically addressed in these revised frameworks.

The Survey

A total of 212 completed surveys from eligible respondents were returned. It is difficult to estimate the exact return rate this represents. We know that only 12% and 15% of staff working in private and not-for-profit centres respectively are university teacher trained. However, we do not know the spread of these staff across centres. The number of staff with both teaching and management responsibilities is also unknown. Further, the database used to distribute the survey included centres licensed for less than 30 children, and which therefore are not required to employ a qualified teacher. Currently, 612, or 31% of LDC centres in NSW, meet this criterion.

Most respondents were female (96.2%), experienced early child professionals who had worked in the field for at least 6 years (73.3%; 40% had practiced as early childhood professionals for at least 10 years). Most were currently working in a not-for-profit centre (62.3%) in a primarily management position (75.0%).

Focus groups

Phase two of the study, designed to further explore issues raised by the survey, involved seven focus group discussions with a total of 54 participants.

Each group discussion addressed five topic areas:
1. What is professional decision making?
2. How does the regulatory environment affect your professional decision making?
3. How does the regulatory environment affect your capacity to provide quality care?
4. Other ways the regulatory environment affects you?
5. Towards an improved regulatory environment

Analysis of each group's data began by locating and transforming points into key themes, and identifying the frequency with which each theme had been raised over the seven groups. Using themes raised in at least a majority of discussion groups, the data was then analysed as a "collaborative construction of meaning" (Hollander, 2004, p. 632), whereby the seven data sets were merged to become a general collective story of how the regulatory environment is experienced by these early childhood professionals. The profile of focus group participants matched that of survey respondents.

It is important to note at this point that findings are largely based on responses from a small group of experienced, qualified practitioners working predominantly in the not-for-profit sector. Our findings, therefore, cannot be taken to be representative of the views of all early childhood professionals working in NSW LDC. Nonetheless, we believe they offer an important contribution to furthering our understanding of the impact the regulatory environment has on professional, quality practices in LDC settings.

Perceptions of the regulatory environment

A review of government and critical discourses (Fenech, under review) pertaining to the regulation of child care revealed four key areas of contestation:

1. The premises underlying the regulatory environment – whether it is a legitimate means of accountability; whether it can and should define quality in standardised ways; and whether it shifts quality of care beyond minimum standards;
2. Whether the regulatory environment supports teachers as autonomous professionals to deliver quality care;
3. Whether the regulatory environment supports the professional esteem of early childhood professionals; and
4. The extent to which the Regulation and QIAS support the daily practice of early childhood professionals.

Survey findings

Closed survey questions measured respondents' views on each of the above contested areas. Five point Likert scales of 'agreement' or 'support' were used. Responses ranged from 1 = strongly disagree / no support at all, to 3 = unsure / some support, through to 5 = strongly agree / great deal of support. **Findings showed that respondents held the following views**:

1. Underlying premises

- **Respondents strongly agreed that "being accountable is a legitimate requirement"** (M = 4.5, SD = 0.8), and that **"not having a regulatory environment is a risk to the standard of long day care"** (M = 4.5, SD = 0.8).
- **Respondents disagreed that "quality care can be measured/evaluated in a standardised way"** (M = 2.8, SD = 1.1) and that **"quality care should be measured/evaluated in a standardised way"** (M = 2.8, SD = 1.1).
- **Respondents agreed that "the regulatory environment has the potential to shift the focus of care at my centre away from innovative practice to achieving minimum standards"** (M = 3.8, SD = 1.0), but they disagreed with the premise that it has (M = 2.7, SD = 1.2).

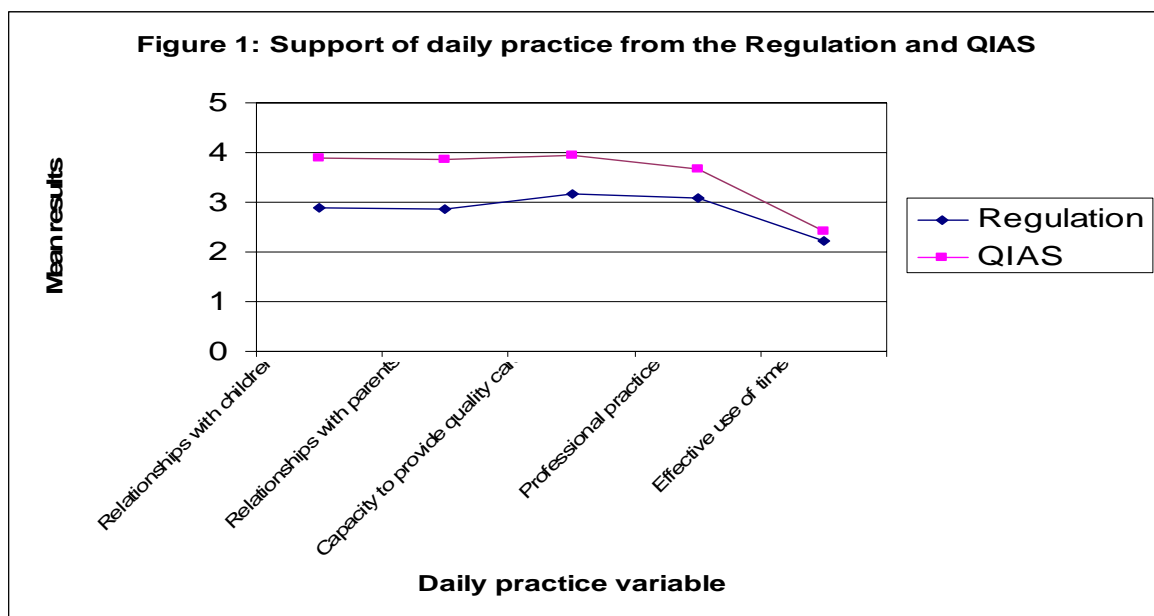2. *Support of teachers as professionals to deliver quality care*

   - **Respondents believe that the regulatory environment supports their professional practice (M = 3.6, SD = 1.0) and provides useful standards against which that practice can be evaluated (M = 3.6, SD = 1.1). However, they also believe that the regulatory environment is too prescriptive (M = 3.4, SD = 1.1) and would prefer a regulatory system that better facilitates their professional autonomy (M = 3.9, SD = 0.9).**

3. *Support of professional esteem*

   - Respondents perceived that the Regulation (M = 3.4, SD = 1.1) and QIAS (M = 3.5, SD = 1.1) supported their professional esteem to "some" extent.

4. *Regulation and QIAS' support of early childhood professionals' daily practice*

   - **Respondents believed that QIAS (M = 3.5, SD = 0.8) provides significantly more support for their daily practice than does the Regulation (M = 2.8, SD = 0.8).**

   - Support from QIAS is perceived to be greater than the Regulation on all daily practice variables (See Figure 1). With each of these mean scores, the corresponding SD figure ranged from 0.94 to 1.16 (most had a corresponding SD score of 1.0).

   - **An effective use of time is least supported by both the Regulation and QIAS**.

Figure 1: Support of daily practice from the Regulation and QIAS

Focus group findings

Focus group data suggests that the low support ratings for the Regulation were owing to factors other than its focus on base, structural quality. Some standards set in the Regulation, particularly the staff:child ratio for under two year olds, were perceived as being below what constitutes minimum standards and were not regarded as being in keeping with current research. Other key concerns raised were that the Regulation was viewed as overly risk oriented, to the detriment of children's wellbeing and development, whilst Children's Service Advisors, who were at times experienced as overly critical and unsupportive, could enforce a subjective and inflexible interpretation of requirements.

Interestingly, whilst focus group data confirmed respondents' perceptions about the benefits afforded by accreditation, the open discussion allowed for a broader set of concerns to be raised, including:
- **Fulfilling QIAS requirements can strain staff relationships with parents**
- **QIAS adopts a simplistic 'tick-the-box' approach to understanding and measuring quality**
- **QIAS validators can impose their subjective interpretation of requirements**

Time was an issue raised across all focus groups. Requirements for both QIAS and the Regulation were perceived to be excessive and repetitive, and fulfilling them involved regular unpaid overtime. For many, meeting these requirements took them away from their 'core work' and led to feelings of frustration and inadequacy when trying to fulfil both management and teaching responsibilities.

Satisfaction with the regulatory environment

Given **respondents**' perceptions of the regulatory environment, it was not surprising to find that they **were satisfied with these requirements only "to some extent"** (M=3.0, SD = 0.9).
Two demographic variables impacted on this level of satisfaction environment:
- respondents from not-for-profit centres were more satisfied with the regulatory environment than their for-profit counterparts
- as experience increases satisfaction with the regulatory environment decreases

When the importance of each of the four points of contestation was evaluated, only those associated with support of teachers as professionals to provide quality care and support of daily practice were significant.

Policy and practice implications: Some theoretical considerations

Based on these findings, the regulatory environment presents as, in the words of one focus group participant, "a double-edged sword". On the one hand, findings point to the contribution regulatory requirements can and do make to structural and process elements of quality, particularly by reducing the risk of substandard care (the Regulation) and facilitating daily professional practice (QIAS).

However, the assuring of these dimensions of quality by the regulatory environment is impeded firstly, by unfulfilled intentions. In particular, the Regulation is perceived to lead to excessive risk management and contains standards that fall below what international research conclusively shows to contribute to quality caregiving. Secondly, structural and process quality areas are also impeded by the regulatory environment's "spillover effects" (Queralt & Witte, 1999, p. 111). These include the regulatory environment's detrimental impact on early childhood professionals' time, their relationships with parents, and their capacity to autonomously engage in quality, professional practices.

Several theoretical constructs and ideas are guiding our thinking on the possible implications of these findings for policy and practice:

1. *Quality care is dependent on a multiplicity of intersecting variables* (Goelman, Doherty, Lero, LaGrange, & Tougas, 2000; Whitebook et al., 1997).

Our findings support the view prevalent in government discourses, that the regulatory environment contributes to quality standards in LDC. Our findings, however, do not support the notion, again contained in government discourses, that the regulatory environment *ensures* quality. Issues pertaining to time and workload, excessive risk management, and staff:child ratios for under 2s, provide just some examples which illustrate that a suggested linear and causal relationship between a regulatory environment and quality is problematic.

In this light, we propose that regulatory reform such as the current review of National Child Care Standards:
- **address the structural and process quality concerns raised by this research; and**
- **posit the regulatory environment as a key element of the contextual and adult work environment dimensions of quality. In other words, evaluating the contribution regulatory requirements make to quality care needs to encompass the impact of these systems and requirements on factors such as work conditions, centre policies, staff turnover, and job satisfaction. As we know, high levels of stress and staff turnover are not conducive to responsive, positive and consistent interactions with children (Boyd & Schneider, 1997; Goelman et al., 2000). This seems particularly pertinent to the NSW early childhood teacher labour market which, as previously mentioned, has and continues to be marked by, high staff turnover rates and recruitment and retention difficulties.**

2. *Legitimacy and risk*

Pursuing Weber's (1962) concept of legitimate authority seems worthwhile in light of our findings. Juxtaposing respondents' strong support for the intent of the regulatory environment is their perception that the *processes* and *outcomes* of this regulatory environment, intended or otherwise, are problematic. On what basis do early childhood professionals view the regulatory environment as legitimate? Do their concerns over the processes and outcomes of the regulatory environment detrimentally impact on their legitimate authority as professionals?

There seems scope to explore the notion of legitimate authority in light of risk theory. Lupton (1999) for example notes a shift from the historical modernist notion of risk as having both 'good' and 'bad' potential to being a predominantly negative construction, and posits risk discourse as being a product of sociocultural, political and economic factors. Questions in our minds that warrant further exploration then, include:

- Can the regulatory environment overseeing long day care be seen as an appropriate response to legitimate concerns and anxieties? Or do such auditing systems instil a sense of fear and thereby create their own legitimacy?
- What do early child professionals perceive to be the risks of an early childhood sector operating without regulatory requirements?
- What contextual factors lend to perceived 'bad' risks?
- In the context of a regulatory environment, is there scope for early childhood professionals to be risk takers?

3. *Trusting relationships and professional practice within the context of regulatory accountability*

Sachs (2003) argues that the erosion of trust and the brewing of risk anxiety compound a lack of public faith in the profession and in turn harness a perceived need for tighter accountability measures. Trust, autonomous decision making and professional judgements however, are all integral to professional practice (Fish & Coles, 1998; Frowe, 2005; Goodfellow, 2003). Therefore, accountability mechanisms such as the Regulation and QIAS threaten to simplify early childhood professionals' practice into a prescribed, mechanistic application of knowledge devoid of professional judgement. These perspectives not only raise important issues for what it means to practice as a professional within early childhood contexts, but highlight the intricate ways the themes we are exploring intersect.

Discussions of audit cultures by writers such as Power (1997) and Groundwater-Smith & Sachs (2002) raise the possibility of trusting relationships and autonomous decision-making playing a more prominent, and indeed necessary, role in regulatory environments. Given the expressed desire by participants for a regulatory environment that better facilitates their professional autonomy, what might this look like? Does this present as a feasible way forward in attempting to reach a better balance between professional accountability and autonomy in long day care?

4. Early childhood professionals as "docile bodies" or "activist professionals"?

Drawing on Foucault's (1977) notions of disciplinary power and resistance, we hope to examine early childhood professionals' working responses to the regulatory environment. Common to critiques of regulatory accountability in early childhood is the absence of an active, confident, and purposeful early childhood profession. Indeed, one is led to assume that individual early childhood professionals lack any power base from which to operate and have been passive receptors of overwhelmingly dominant accountability measures and state controlled quality care discourses. Greishaber (2002, p. 162), for example, purports that accountability systems such as QIAS create a "docile yet productive" workforce. We are interested in exploring the notion of individual agency, and whether, in the context of a regulatory environment, early childhood professionals in NSW LDC have scope to operate, and indeed do operate, as activist professionals (Groundwater-Smith & Sachs, 2002).

We wonder whether the correlation between experience and level of dissatisfaction with the regulatory environment might be significant here. Despite their dissatisfaction with the regulatory environment, are more experienced early child professionals able to make the regulatory environment 'work' for them? Do they use strategies of resistance (Foucault, 1977). If so, how and in what circumstances?

5. *An ecological approach to early childhood professionals' perceptions of the regulatory environment*

Whilst perceptions are individual, they are also contextually bound. The standard deviation survey results, together with our focus group data, highlighted a spectrum of perceptions early childhood professionals hold towards the regulatory environment. We are interested in exploring the mix of influences that shape and produce these varying perceptions. Bronfenbrenner's (1979) ecological theory, as adopted by Hayden (1996), provides a useful basis to explore these contextual variables. The following table outlines some examples of contextual variables worth consideration:

System layer	Application	Variable
Microsystem	The individual early childhood professional	Experience; education; philosophy; values; position
Mesosystem	The adult work environment	Trusting relationships; shared vision; employment conditions; management support/expertise; adoption of standards above regulation
Exosystem	Government legislation, policies, industrial context, current research	Regulatory requirements; frequency of regulatory changes; style/experience of validator/CSA; early childhood teacher shortages; low wages; growth of the

		private/corporate sector; demand for child care places
Macrosystem	Societal attitudes, beliefs, and values	Professional esteem; risk culture; fear of litigation; sector divisions; valuing of early childhood

6. Postmodern/poststructuralist approaches to early childhood

In thinking about these theoretical ideas, we will also take a step back and use postmodern and poststructuralist lenses (eg., Dalberg, Moss, & Pence, 1999; Mac Naughton, 2005) to explore the implications of our findings at a more fundamental level, asking questions such as:
- What dominant view of the child underlies the regulatory environment?
- How does the regulatory environment construct knowledge, in particular, knowledge about quality?
- Whose interests does the regulatory environment serve? Whose voices are marginalised?
- Does the regulatory environment favour a particular type of early childhood professional? For example, how does an early childhood professional as technician or as social activist fare in the existing regulatory climate?
- What meaning does the regulatory environment ascribe to autonomous, professional judgements?

These questions, coupled with our findings, have potential implications for early childhood education programs. For example, how is the regulatory environment posited to students? Are multiple positionings and working responses presented? Are early childhood students challenged to consider the dominant truths espoused by the regulatory environment?

Conclusion

Our findings to date appear to provide the foundation of a much more complex story waiting to be unfolded. We will continue to explore early childhood professionals' perceptions of the regulatory environment as we complete a series of in depth interviews with early childhood professionals. Whilst our findings are not representative of all early childhood professionals in LDC, we believe they nonetheless provide an important contribution to understanding how regulatory requirements can impact professional practice not only in early childhood settings, but in other educational contexts as well.

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