

Response to the National Quality Framework Draft Assessment and Ratings process and documents



National Quality Framework Submission

Early Childhood Quality Group
Department of Education, Employment
and Workplace Relations
Loc C17MR2
GPO Box 9879
CANBERRA ACT 2601

Prepared by:
**Early Childhood Management Services
(ECMS)**

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ECMS, as the largest provider of Kindergarten services in Victoria, welcomes the opportunity to provide a response to the draft documentation for the assessment and ratings process of the National Quality Framework for Early Childhood Education and Care.

We have 55 services, including Kindergarten, Family Day Care and Long Day Care, providing education and care to over 5,000 children and their families each week. We believe that our status as a large service provider and our understanding and expertise, particularly in Kindergarten services, provides an opportunity for a unique perspective that will be useful in the development and implementation of this important reform agenda.

ECMS is supportive of the National Reform Agenda and is excited by the extension of the Quality Rating system to the Kindergarten services. In particular, we are encouraging of the reflective nature of the system and we support the external evaluation of those reflections. As a strategic theme underpinning our work, we are particularly interested in supporting the development of inclusive, responsive and accessible services that enhance positive outcomes for children and families who are experiencing disadvantage and are particularly policy and program susceptible. The National Reform Agenda provides an opportunity to enhance the service system in a way that supports ECMS' Vision of a *"community where all children have the opportunity to be their best and all parents, families and communities are enriched by their child's learning"*.

We are concerned that the amalgamation of the Regulations and the Quality Standards does not result in a lowering of the minimum standards of education and care and the potential for negative outcomes for children. We therefore seek that the National Quality Framework, at the very least, maintains both the minimum standards of the Regulations and the quality requirements of the Accreditation system.

Issues/Comments

1. Draft Assessment and Rating instrument

We are encouraged by the introduction of an assessment and rating instrument that will provide different rating levels to encourage and guide service improvement and support the sector in striving for excellence.

While ECMS understands the desire and benefits of different rating levels we feel that some of the individual *Elements* may require a

clearer response.

The current State-based Regulatory requirements in regard to staffing levels, qualifications, supervision etc. articulate the requirement in regard to these areas, that is, they state the minimum requirement to ensure the service is not in breach. The current draft ratings appear to allow operators to negate these minimum standards, for example:

Quality Area 2, Standard 2.3: Each child is protected

Element 2.3.1 for Foundation: "Appropriate procedures for the supervision of children are in place."

Our concern is that if services are required to have procedures for supervision but not actual supervision in place, children's health and safety may be at risk.

ECMS would argue that there should be some aspects of education and care which are "not negotiable" and the practice of these should be deemed to be either satisfactory or unsatisfactory.

Therefore we question the need for the rating level of Foundation in these areas as it is confusing, potentially misleading and allows for a service to operate with a rating level that is simply inadequate.

Recommendation

1. That the Rating level of Foundation be removed from Elements relating to core Regulatory requirements such as staffing ratios, qualifications, health and safety.

2. Approvals

We understand that many of our questions regarding the Approvals process will be explained in the impending Draft Regulation document and consultation. In general, we look forward to simplified processes and ongoing approvals which should minimise the paperwork and processes for organisations such as ours.

We appreciate the need for the system to be part-funded by early childhood services and request consideration be given to increasing the minimum number of licensed places from 26 to 30, in the lowest category, so that the Kindergartens in Victoria are not disadvantaged in the next few years as we move towards a significant reduction in the ratios (from 1:15 to 1:11). The cost implication of this system for these services is already high given that it comes on top of the increase in sessional hours and the introduction of the Victorian Early Childhood Teacher and Assistants Award (VECTAA). Many of our families are cost-sensitive and increased fees will result in many, who have the potential

to benefit the most from our programs, leaving the services.

We note the inclusion in the Information Forum discussion about the suitability of the site and location for new services. We applaud the inclusion of this important issue and are pleased to see that planning of service provision will be considered.

ECMS understands the need for some services in regional and remote areas requiring temporary waivers in some circumstances, but we are concerned with the potential for exploitation of this system. The experience in NSW with granting of such waivers to 'not-yet-qualified' staff saw that a majority of the services that sought and received approvals were actually commercial operations. Research commissioned by the NSW Department of Community Services and conducted by the Social Policy Research Centre (SPRC) at the University of NSW indicated a subsequent increase in the breaches recorded for those services. Therefore we urge that waivers are considered only when appropriate measures can be taken for ongoing monitoring and support of those services.

ECMS is unclear how the State Regulatory staff and the new Australian Children's Education and Care Quality Authority staff will work together. We would like to acknowledge the complexity and tensions that exist in these two disparate functions of regulator and quality assessor and look forward to hearing more detail on the roles and responsibilities, the training and support being provided to the staff and the processes to ensure that minimum standards will be maintained.

Recommendations

- 2.1 Proposed Fees - we request consideration be given to increasing the minimum number of licensed places, in the first category, from 26 to 30.
- 2.2 We request that consideration be given to develop and implement a system of approvals for waivers that is rigorous and carefully monitored and evaluated.
- 2.3 We urge that waivers are considered only when appropriate measures can be taken for ongoing monitoring and support of those services.

3. Scope

ECMS supports spot checks and other measures to ensure the robustness of the system and would like to see the continuation of the

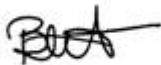
link to Child Care Benefit for long day care and family day care services.

In addition we support the State regulation of other service types that currently sit outside the proposed National Regulations. Given the vulnerability of children and the early childhood sector's experience of cost-cutting measures from some financially focused services, we believe it is important to maintain or establish some form of compliance regime to ensure children's safety.

Recommendations

- 3.1 We would encourage the continuation of the link to Child Care Benefit for long day care and family day care services.
- 3.2 We support the State regulation of other service types that currently sit outside the proposed National Regulations.

ECMS looks forward to continuing to work collaboratively with the government in support of the development and introduction of the National Quality Framework. Please contact me to discuss any of the issues or comments contained in this response.



Bernie Nott
CEO

bnott@ecms.org.au

Tel: (03) 8481 1104

Early Childhood Management Services (ECMS)
192 High St (PO Box 182)
Northcote VIC 3070
www.ecms.org.au