



INDEPENDENT EDUCATION UNION OF AUSTRALIA

SUBMISSION TO EARLY CHILDHOOD DEVELOPMENT STEERING COMMITTEE ON REGULATION IMPACT STATEMENT FOR EARLY CHILDHOOD EDUCATION AND CARE QUALITY REFORMS

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Introduction

The IEUA is the federally registered union representing over 65,000 education professionals (teachers and other education staff) in the non-government education sector, many of whom work in community kindergartens, early child care centres and community preschools which may be either not for profit or profit corporations.

Existing across the early childhood sector are generally two types of governance structures – those early childhood education centres which are corporately owned and run for profit and those ‘not for profit’ preschool, long day care centres, community crèche and kindergarten centres.

Members of the Independent Education Union are employed in the following early childhood education and care settings:

- (a) Long day care centres - These centres are open for eight or more hours per day and usually operate 48 to 51 weeks of the year. They cater for children from 0 to 5 years, although some centres do not take children under two years. The centres usually provide full-time and part-time care with a few of the licensed places reserved

for emergencies. Centres may be either commercially operated, non-profit or not for profit community based.

In NSW, all services are required to provide an educational program for children. However, not all centres employ qualified early childhood teachers.

(b) Pre-school centres and community kindergartens - These centres usually cater for children 3 to 5 years (before they go to school) and usually operate on hours and terms similar to schools. In Queensland's community kindergarten centres cater for children from the ages of 3.5 years to 4.5 years, prior to entering prep school at the age of 4.5 years. Though, where the need arises, Queensland community kindergartens may enrol children from the age of 3 years. In NSW, some preschool enrol children from 2 years.

It is essential to note that the delivery of an educational program is the *raison d'être* of community kindergartens and pre schools.

The vast majority of these centres are community based and in receipt of subsidies from the State Government. In some situations in NSW and Victoria, preschools are attached to schools.

(c) Prep schools in Queensland are early childhood centres attached to schools and are universally available, while not mandatory, to children from the age of 4.5 to 5.5 years. Likewise, while it has not been mandatory for prep schools to employ early childhood education specialist trained teachers, the majority of prep schools have done so, thus acknowledging the importance of appropriately qualified staff in the delivery of quality early childhood education. (It is mandatory that teachers in Prep be registered with the Queensland College of Teachers.)

(d) Early learning centres in Victoria are centres attached to independent schools and operate usually within the resources of the primary school. These centres conduct kindergarten programs and cater for 3 – 4 year olds. Programs run from two to five days on similar hours to schools, depending on the age of the child. Fees are charged at equivalent rates to school fees.

(e) Other centres such as early intervention centres (providing care for special needs children at early childhood centres or in children's homes) and multipurpose services or "hubs" which provide a variety of services for families on the one premises.

The IEUA is responsible for negotiating the awards and collective agreements for members in these various early childhood education and care settings. The processes and outcomes of these negotiations as well as the experiences of our members have strongly formed the basis for our views regarding this sector.

CONSULTATION QUESTIONS

National Quality Standard and Ratings Framework

1. Governments are proposing to implement consistent minimum standards of care across Australia. Do you agree with this approach? Why or why not?

The IEUA recognises the current national issues associated with inconsistent quality standards, duplication of regulatory effort and insufficient information to parents and supports in general, the development of a consistent level of quality standards which would ensure the consistent access to quality early childhood education and care.

However, it is important to ensure that an integrated set of quality standards does not minimise the existing state/territory standards in order for them to be applicable nationally and to a variety of services.

The IEUA has a concern that the standards of an integrated system might lower what is currently required in some states. The IEUA believes that the standards must be improved rather than reduced if quality outcomes for children are to be guaranteed.

Further, as part of the system of minimum standards, there should be a systematic way of the improving these standards over time to ensure the maximum quality learning environments for children.

The IEUA notes reference contained on page 27 of the Regulation Impact Statement which states: “Where a jurisdiction is above the agreed National Quality Standard, that jurisdiction will not be required to change”.

The IEUA strongly supports, where States have currently higher standards, that these should be maintained until such time as the National Standards have been improved to meet that particular State standard.

2. For each care type, which of the options set out in Chapter 5.3 do you believe would best achieve a good balance between meeting the government’s objective of enhancing learning and development outcomes for children, and affordability for parents, and why?

2.1 Recommendations on proposed Staff :Child Ratio

| | <i>Option one</i> | <i>Option two</i> | <i>Option 3</i> | <i>Option 4</i> |
|------------------------------|-------------------|---------------------|---------------------|------------------------------------|
| <i>Birth to 24 months</i> | <i>No change</i> | <i>1:4 by 2015</i> | <i>1:4 by 2011</i> | <i>1:4 by 2010 and 1:3 by 2020</i> |
| <i>25 – 35 mths</i> | | <i>1:5 by 2015</i> | <i>1:5 by 2014</i> | <i>1:5 by 2015</i> |
| <i>36 mths to school age</i> | | <i>1:11 by 2016</i> | <i>1:11 by 2015</i> | <i>1:10 by 2013</i> |

The IEUA recognises international research which demonstrates the achievement of positive outcomes for children is directly related to staffing ratio, staff qualification and the size of the group.

Improvement to staff:child ratio will provide greater opportunities for staff to build relationships with the child, improve the learning environment and essentially reduce staff turn over due to work intensification and low job satisfaction.

In the previous submission on the National Quality Framework, the IEUA called for the recognition of the OECD research which identifies that quality early childhood education and care is supported by staff/child ratios of at least 1 adult to 3 children for infants(1:3) at least one adult to four children for one –two year olds (1:4) and at least one adult to eight children for three-five year olds (1:8).

The IEUA supports Option 4 as providing suitable adult:child ratios which are closest and most acceptable to the OECD recommendations.

2.2 Proposals relating to Qualifications

2.2.1 Staff other than Teachers

*All staff working with children would be required to have a minimum Certificate III level qualification (or be enrolled in study) no later than end of 2013.
Fifty percent of all staff working with children are to have a qualification (or be enrolled in study) of Diploma or above by no later than the end of 2013.*

The IEUA believes that quality early childhood education is provided only through tertiary qualified and registered teachers supported by qualified early childhood teacher assistants and childcare workers.

The IEUA supports the above recommendation in relation to requirements for Certificate III and Diploma qualifications for staff as one part of the mechanism to delivering quality early childhood education.

Further we recognise the existing strategies provided by the Federal Government to assist staff in improving the level of qualification such as:

- the removal of TAFE fees for eligible child care diplomas from 2009-2012;
- the creation of additional university places in early childhood degrees from 2009, rising to 1500 to 2011; and
- the reduction of HECS-HELP debts for those early childhood educators who work in defined rural and regional areas, indigenous communities and areas of social-economic disadvantage.

The IEUA recognises the value of access to Recognition of Prior Learning pathways for existing untrained staff to obtain Certificate III qualifications. However it is recommended that consistent criteria, evidence collection and support documentation are maintained through the process to ensure quality of the qualification.

A review of the accreditation processes of existing training providers course structures and requirements would ensure the consistency of quality of Certificate III qualification was achieved.

The IEUA further recommends the continuation of further assistance to those in rural/remote and indigenous areas such as fee subsidies including travel and accommodation expenses, greater access to online professional development, and course fee scholarships/subsidies for targeted remote and indigenous communities where access to qualified and trained early childhood staff has been identified as an issue.

2.2.2 Qualified Teacher

Services that have 25- 59 children on any day, are required to employ 1 full-time university qualified early childhood teacher by 2013.

Services that have 60- 80 children on any one day, are required to employ 0.5 of an additional university qualified early childhood teacher by 2015 and a full additional university qualified professional for service with over 80 children on any day(with exact requirements for additional professionals to be determined).

Services with less than 25 children would be expected to have access to a proportion of an early childhood qualified teacher for educational leadership by 2013.

Where the service provision only includes children birth to 3 years or where there is already a qualified teacher on site an appropriate alternative qualification may fulfil this requirement (with the need for and exact requirements for additional professionals to be determined).

IEUA believes that quality early childhood education is provided only through tertiary qualified and registered early childhood teachers supported by early childhood teacher assistants/child care workers.

Researchers have defined the characteristics of the most effective early childhood settings as containing detailed and focused planning, strong leadership and management skills, adult-child interactions that supported children's thinking and at least one university-trained early childhood teacher supporting and working with less qualified staff (Sylva, Melhuish, Sammons, Siraj-Blatchford, Taggart & Elliot, 2003).

Teachers with specialised early education qualifications possess significantly greater knowledge and skills in relation to early childhood learning theories and models than employees with other qualifications.

The IEUA recognises the existence of some 3 year university qualified early childhood teachers currently employed within some centres. The IEUA recommends support such as the removal of HECS so that these teachers may upgrade their qualifications as required by the standards.

a) Proposed Ratios

The IEUA welcomes the introduction of a quality standard which seeks to standardise the requirement to employ qualified early childhood education teachers. However, we do not accept the proposed ratios of qualified teacher to children enrolled as appropriate for the delivery of quality education.

We do not accept the proposal of only one teacher for 25 to 59 children. One teacher cannot be expected to develop and implement a high quality educational program for up to 59 children.

Teachers need to be present and be involved directly in the implementation of the program. Early Childhood programs must be continually evaluated and adapted to ensure that they continue to meet the needs, abilities and learning styles of all children. Teachers need not only to develop the appropriate program for the child, but also need to implement the program.

Workload issues are already an existing contributor to the low morale of the sector and responsible for the high turnover of staff. Brennan (2006) reports that staff turnover in the child care industry is very high: “*Approximately 70 per cent have been working in the area for four years or less*” (p. 224). Noble & Macfarlane (2005) state “*...at the beginning of their second year of service early childhood teachers reported significant increases in burnout, in comparison to primary and secondary school teachers*” (p. 53, cited Noble, Goddard & O’Brien 2003).

b) Inconsistency with some existing state requirements

The IEUA expresses grave concerns with that proposed ratios are significantly higher than those required by current standards in some situations and therefore will work against the attainment of quality early childhood education.

In particular, it is a current requirement of the DECKAS funding for Community Kindergartens in Queensland to employ specialised, tertiary early childhood education trained teachers who are registered under the Queensland College of Teachers. It is also a requirement that a second adult be employed to be present at all times to assist the qualified teacher.

This significant decision was made to ensure the delivery of quality of education in community preschools and kindergartens. A determination was made that in both half day programs and full day programs, 1 qualified teacher and 1 qualified assistant to 22 children of an age group 3.5 – 4.5 years would be required.

This ratio remains applicable in Queensland community preschool and kindergartens.

It must also be noted that the teacher:child ratio is based on the number of children enrolled per session and not on the average attendance per session. This requirement is inconsistent with the proposal “*(number of)..... children on any one day*”.

The IEUA does not accept linking the qualified teacher to child ratio to the number of children “on any one day” as this will greatly effect the regular

engagement hours for a teacher, thus entrenching the casualisation of the teaching workforce.

It also leads to an underestimate of the total number of children requiring educational developmental programs undertaken by a teacher when taking into account consideration of part time attendance patterns. A centre licensed for 59 places can mean in actual terms three times that many children in contact with a teacher.

The IEUA strongly calls for all teacher to child ratios to be linked to the total number of children enrolled and expected group sizes.

c) Safeguarding against manipulation of group sizes

The IEUA remains wary of situations where centres may attempt to manipulate the licenced sizes to under minimum number of children to prevent the employment of a full time qualified teacher.

As outline in our previous submission on National Quality reforms, IEU members had provided information on private providers which attempt to occupy two separate buildings next door to one another with limited number of licenced places each in order to avoid meeting the regulations in regard to the employment of qualified teachers.

d) The interaction between Universal Access and National Quality Standard, resulting in work overload

The IEUA notes that the proposed National Quality Standard requirements are separate from, but complementary to, the Universal Access commitment. Further it is noted that the document states “ *that the same staff member could be used to deliver both Universal Access preschool and provide educational leadership across a service as required by the proposed standard.*”

The IEUA acknowledges the Government’s commitment for universal access to early childhood education as a positive step forward.

However, the IEUA believes that interaction of the two standards needs to be closely examined. In particular, in terms of the qualified teacher to child ratios and the implications of work load issues.

The role and duties of a teacher in developing, implementing and monitoring early childhood education programs is complex.

Teachers write very detailed developmental summaries, which include definite long-term goals for each child. These are then broken down into short-term goals and form the basis of the play base curriculum.

Teachers record and analyse detailed observations of all children in order to assist them to determine how each child is developing and learning. The tasks each child performs are broken down into their component skills in order to assist the child to progress to the next logical step in their development.

A variety of activities and resources, appropriate to the child's current understanding and interests, are selected in order to challenge children's thinking and skill level.

Children progress through these skills in differing periods of time depending upon development and past experience. In addition, young children arrive at preschool with differing abilities.

Early childhood teachers evaluate the effectiveness of their program according to how effective and motivating experiences were in assisting the child to acquire new skills.

Thus, the duties undertaken by an early childhood teacher are wide ranging; yet, little or no programming or administration time is provided.

Many teachers working in Long Day Care Centres estimate that they work between 4 and 20 unpaid hours per week at home and at the centre.

Warrilow et al. (2004) found reasons for the shortage of staff include "*a lack of ongoing education opportunities, poor working conditions, a lack of professional support, limited opportunity for career progression and the low status of the profession in society. The situation is exacerbated by the fragmentation of the sector, funding restrictions and a mismatch between pre-service training and job expectations, the level of administrative work required and workplace stress and burnout*" (cited in Fisher & Patulny, 2004, p. 7).

It is not logical to assume that a teacher can be expected to perform the "educational leadership" function during the time (15 hours minimum) that teacher is delivering the educational program.

There will also be restrictions on the amount of time available to one teacher to implement a educational program and provide leadership, particularly as the number of children in a program increases.

In the Queensland context, the maximum number of hours for a teacher delivering an educational program is 27.5 hours per week. Where there are (for example) 55 children, this would be two groups for the purpose of delivering an educational program. Therefore in Queensland, one teacher could not deliver two educational programs(55 children) in one week.

Nor is it feasible to suggest that the one teacher could provide both two programs and "the educational leadership" when dealing with a centre of 55 children. The teacher simply would not have enough time.

More detailed consideration must be given to the remaining time available and the impact of expectation on an early childhood teacher to provide "*educational leadership*" in addition to developing, implementing and monitoring the outcomes of the education program for a large group.

Specific consideration needs to be given to the particulars of current industrial awards/agreements which determine the number of contact hours for an early

childhood teacher. Consideration should also be given to comparable industry standards for teachers in schools.

Where a centre has enough children that two groups would be required for delivery of the educational program, then more than one full time teacher would be required when both the National Quality Standard and the Universal Access commitments are taken into account.

e) Employment of qualified staff other than teachers

The IEUA does not accept the proposals for the employment of additional university qualified “professionals” which may hold qualifications other than teaching, in particular in settings with a high number of children under the age of three enrolled.

Degrees in other disciplines other than teaching cannot ensure that the holder is aware of early childhood development and be able to develop and implement appropriate educational programs.

To ensure quality education, early childhood education and care programs must be continually evaluated and adapted to ensure that they continue to meet the needs, abilities and learning styles of all children.

Such qualified early childhood teachers utilise their comprehensive knowledge of child development to observe and assess children’s abilities, strengths and needs and to plan appropriate activities and experiences in a play based learning setting in order to address each of these.

Only qualified early childhood teachers have the specialised skills required not only for the development of an appropriate program for the child, but also to implement and monitor the program.

Further, research has also shown that management of centres by university-qualified teachers to be directly related to higher ECERS scores on literacy, language reasoning, mathematics, science, diversity, activities provided, interactions, program structure and relationships with families. *“The total ECERS score of the setting was positively correlated with the percentage of qualified teaching staff. In addition, less well-qualified staff demonstrated significantly better practices when they were led by qualified teachers”* (Sylva et al., 2003, p. 6).

The IEUA asserts that to ensure quality early childhood education and care, all early childhood programs should have access to a qualified early childhood education teacher.

f) Recommendations

(i) The IEUA recommends the full time engagement of a qualified early childhood education teacher in centres where there are 20 children and for this qualified teacher to be assisted by a qualified early childhood teacher assistant(s) or childcare worker(s), depending upon the appropriate child to staff ratio.

(ii) We further recommend the full time employment of an additional qualified early childhood teacher for each additional 20 children enrolled in the service.

(iii) The IEUA supports the proposal that services with a determined minimum number of children would have access to a proportion of an early childhood qualified teacher and would support the minimum number to be less than 20 children. This proposal would ensure that a qualified teacher albeit on a part time basis, would remain responsible for developing the program and overseeing the delivery.

(iv) The IEUA strongly recommends that the qualified teacher:child ratio be re-examined in terms of the interaction between the Universal Access and National Quality Standards giving close consideration to hours of engagement and work load issues.

2.2.3 Affordability for Centres

All indicators of quality, such as low child-staff ratios, staff qualifications and quality regulation will incur a cost to the delivery of the service.

Funding of early childhood education and care in Australia is at lower levels compared to other OECD nations¹.

While the COAG reforms will increase the proportion of funding to the respective States and Territories, a significant commitment to increase funding toward early childhood education and care is still necessary from the Federal Government.

Government funding for early childhood services can occur in several ways. Currently the federal government funding is only through direct subsidies to parents. State Government funding may be through operational recurrent or capital funding, the direct delivery of services, funding to parents or funding tied to specific purposes such for children with special needs.

IEUA believes that there is a strong case for increasing investment into the quality early childhood education and care programs.

The IEUA strongly believes that, in order to address this problem, government must review its funding structures to cover the cost of employing qualified staff at comparable salaries, access to ongoing professional development and the purchasing of resources to care for and educate children thus ensuring equity of access to early childhood education and care.

The IEUA draws the committee's attention to the current funding arrangements for community kindergartens in Queensland. While it is noted that the funding arrangements are under review, the existing recurrent funding arrangements provides for approximately 80 percent of approved staff costs for a teacher/director and an assistant employed for each community kindergarten unit and is based on the following:

¹ UNICEF Report Card 8, (2008) p 20

- the appropriate award/collective agreement salaries of the teacher /director of each kindergarten unit;
- the appropriate award/collective agreement salaries for an assistant;
- other staff costs payable under the collective agreement including:
 - compulsory occupational superannuation;
 - district and locality allowance;
 - holiday leave loading of 17.5% on 4 weeks; and
 - voluntary superannuation payment from 1 October 2006 as prescribed by the collective agreement.

IEUA members in Queensland have reported that community kindergarten committees believe that as the funding formula secures funding for qualified early childhood education teachers, the committee is able to select a teacher on the basis of quality and experience, not cost.

Despite the development of a new funding model for all 3.5 and 4.5 year olds and a selection of child care centres that engage a qualified teacher to deliver an education program, both IEUA members and parents at the community kindergartens have been supportive of the general principle underpinning DECKAS funding (i.e. the direct linkage to staffing costs) and have sought for similar to continue.

The Victorian government has also committed funds to ensure that preschool teachers receive comparable pay rates to teachers in schools.

2.2.4 Funding Support for Families

The bulk of Commonwealth funding for childcare has been through the payment of the Childcare Benefit (CCB) and the Child Care Tax Rebate (CCTR).

However, it can be considered that this mechanism of funding allows for the corporatisation of the industry and limits the government responsibility to ensuring quality education and care.

The corporate monopoly of childcare services has made it harder for governments to control levels of childcare fees.

An increase in the CCTR or to the CCB easily becomes a gift to the “for-profit” organisations, as they have been able to lift their prices knowing that the taxpayer will pay for the cost of any increase.

The IEUA supports the exploration of alternative subsidy structures which would ensure more regulation on early childhood education and care fees, with proven quality outcomes for children.

A further identified problem regarding the current mechanism of Commonwealth funding is that it denies parents choice when considering long day care or preschool.

For example, in NSW, there is a significant discrepancy which financially disadvantages families who send their children to preschool (as opposed to childcare)

and this has negatively impacted enrolments in NSW preschools. In NSW, preschool fees are on average around \$40 per day. This is unaffordable for many families.

The ineligibility for CCB and CCTR means that a significant number of families must consider the payment of preschool/kindergarten fees unsubsidised or choose long day care settings.

The IEUA recommends for the funding divisions between preschool and long day care to be lifted, parents be able to access CCB and CCTR or similar financial support for either service.

3. Do the proposed standards address different cultural and diversity requirements and considerations adequately? If not, do you have any suggestions for how the standards could be further improved?

The divide between remote, rural and indigenous Australia provides considerable challenges when considering equity of quality early childhood education. There are higher than average levels of unemployment, poverty and disadvantage in these areas. This places additional pressures on the provisions of educational and social services in a context where distance and delivery already make access and participation difficult.

The IEUA supports the seven quality areas are appropriate for all services and believes that they are broad enough to reflect diversity. However, it must be recognised that the implementation of standards must take into consideration issues of access, staff qualifications and retention are most acute in remote settings and supportive mechanisms be developed to assist centres.

4. What would be the impacts of changes to FDC arrangements?

No comment.

5. What would be the impacts of the proposed changes to staff qualifications on services, particularly small, or rural or remote services?

a) Small, rural or remote service

Small, rural and remote services will need time and support to adjust to the changes.

The IEUA believes that it is important to recognise that services in remote, rural and indigenous communities will require additional support in meeting the standards. Equally, it is essential not to reduce the standards for such services.

All early childhood education and care services must strive to provide quality early childhood education and care regardless of location.

Staff living in indigenous communities and in regional and remote areas experience disadvantage due to the high costs associated with travel and accommodation required in order to attend formal training institutions.

Teachers, like all other professionals, need incentives to work away from culturally safe or familiar contexts.

Early childhood education teachers and teacher assistants/childcare workers and other childcare staff living in regional and remote areas experience disadvantage due to the high costs associated with living in the area. For example early childhood teachers in Wadeye, Northern Territory, are required to pay excessive air freight costs to access fresh fruit and vegetables.

However the government can consider a number of incentives to ensure that appropriately trained staff are prepared to work in these areas. Such things as payment of full HECS fees for teachers willing to work for a period, industrial incentives such as more recognition of service, relocation allowances and ensure that appropriate accommodation is provided.

The following are recommended as mechanisms to support early childhood education and care service and early childhood staff in regional and remote areas:

- Remote area allowances and subsidised accommodation.
- Assistance with travel and accommodation required in order to attend formal training institutions and professional development.
- Scholarships covering tuition fees, travel and accommodation expenses.
- Strong local support networks need to be established to address isolation and the need for ongoing professional support.
- Offer higher wages, bonuses, relocation allowances and subsidised accommodation to early childhood teachers who are willing to relocate to regional and remote areas.
- Scholarships for indigenous, remote and rural communities covering tuition fees, travel and accommodation expenses.
- Strong support networks established in order to encourage indigenous child care workers to enter the field and to upgrade their qualifications.
- Ongoing, culturally inclusive professional development.
- The development of pre service courses and ongoing professional development courses with culturally inclusive curricula.
- Alternative pathways for entry, such as the Bachelor in Teaching (Early Childhood Services) program for Indigenous Child Care Workers at Macquarie University.
- Courses and mentoring support systems designed to assist Indigenous students to develop literacy skills that enable them to cope with study at TAFE and university.

IEUA believes that to ensure quality of early childhood education services in remote, rural and indigenous areas must involve community development activities. This will ensure that services meet the particular needs of communities and that they are viable in the longer term.

The IEUA recognises the Batchelor Institute of Indigenous Tertiary Education which offers distance education in childcare education in a number of remote communities.

It also provides community support to remote centres. The increasing demand for both training and support reflects the growth of, and interests in early childhood education in both indigenous and remote communities.

Close community liaison and the tailoring of programs for adults and children to meet community needs is the key to success (Wiltshire 2000).

The cost of this in terms of time, people and resources must be factored into early childhood education funding.

b) Temporary exemptions

It is noted that the RIS proposes “Temporary exemptions may be considered where appropriate. For example, in areas classified as remote or very remote by the ABS remoteness indicator where they can demonstrate they have been unable to source appropriately qualified staff, they may be granted an exemption to use less or differently qualified staff.”

Currently some small preschools and kindergarten classes in the Northern Territory are conducted by teacher assistants/childcare workers or by teachers without formal early childhood education qualifications.

All children need access to planned play based educational programs conducted by qualified early childhood teachers and it is not appropriate to accept lower standards for one part of the community.

While it is recognised that some remote regions will experience difficulty in staffing their centres with qualified teachers, strong limiting conditions around exemptions must be applied.

The IEUA does not support the use of temporary exemptions without strong regulatory conditions.

Exemptions must be only for those centres in remote or very remote regions and for a limited period of no more than 12 months. Documented evidence must be provided to demonstrate reasonable efforts to engage a qualified teacher, including provision of salary incentives. The quality rating system “operating requirements” must be applied in such situations and strict review processes on the centre implemented.

Where no such evidence is provided, the “Unsatisfactory” quality rating system must be applied and steps are taken to remedy the situation or close the service.

6. Do you think the proposed quality rating system would be an effective indicator of service quality?

The IEUA believes overall, that the proposed quality rating system could be utilised as an effective indicator of service quality and supports the seven (7) indicators.

We believe the simplicity of the indicators will be easier for parents to remain informed about their choice of provider.

Further, the IEUA believes it is essential for the Quality Standard and Rating Framework indicators to have supporting template documentation which demonstrates how each area will be assessed for quality, outlining examples of practices that would meet each quality standard.

Importantly, outcomes will need to be different for each age group and service type e.g. children's wellbeing, health and safety is very different for infants compared to children of primary school age attending OOSH services.

As well, outcomes are required for children from diverse backgrounds and special needs.

Centres will require assistance and professional training to implement and monitor the quality standards. Qualified representatives from the sector should be engaged to support the centres as they achieve National Standards and develop mechanisms to improve above the National Quality Rating.

7. Would the quality rating system help to drive continuous improvement in the ECEC sector? If not, do you have any suggestions for how the quality rating system could be further improved?

The IEUA believes that the potential to drive continuous improvement exists within the quality rating system. In order to achieve this potential, staff and providers must be given clear and specific feedback regarding how they can improve the quality of their service regarding each of the quality standards and be provided with subsequent professional development and professional support in order to achieve these standards.

Centres and their staff need to be supported through accessible, affordable and relevant professional development on the new standards and their implementation.

Further, quality standards will require ongoing documentation. It is strongly recommended that staff/directors of centres are provided with programming time (away from the children) to complete documentation.

The IEUA recommends that specific timelines be determined for those structural quality indicators which have been rated “operational” or “unsatisfactory”. Centres need clear directions as to the steps required to reach the National Quality Standard Rating and the timeline expected of them to achieve that rating.

Further, it would be conducive to service transparency if under the new National Quality Standards and Rating Framework, centres are required to inform parents of the centre if their service is not meeting the national standards, particularly in relation to staff qualifications and child-staff ratios.

Detailed information provided at the centre outlining the rating against each Quality indicator would provide appropriate information to parents about the centre.

8. (a) **What criteria do you think should be used to rate a service as Excellent?**
- (b) **How should the rating be assessed and by whom?**

The IEUA believes that dialogue with stakeholders should continue in order to develop appropriate and meaningful criteria within the rating framework. The criteria must take into consideration the service type and age of children and location.

Further, the IEUA believes that where a jurisdiction has a higher standard than that of the National Quality Standard and is therefore required to maintain that higher standard, then the rating of High Quality or Excellent should be applied to that quality indicator.

For example, where a service in a state has a higher teacher:child ratio and that is maintained, the a high quality rating should be applied to the quality indicator “staffing arrangements”.

The IEUA believes that qualified and very experienced early childhood professionals who can provide advice to staff regarding quality improvement and who are well-trained in determining how adequately the quality indicators are being met, are the most appropriate personnel to carry out the rating processes.

Such qualified professionals would be able to explain the importance of each of the quality indicators and assist services in the development of improvement plans.

Further such professionals should have recent experience in relevant settings (preschool, long day care, out of school hours care, family day care and/or indigenous services) and thus ensure that the advice given is applicable to various service types and is practical and realistic in nature.

LICENSING AND REGULATORY ARRANGEMENTS

9. **Do you think integrating the existing regulatory arrangements will reduce costs for the industry and for governments? Do you think this approach will be sufficient to ensure ECEC provided is high-quality?**

The proposed arrangements have the potential to reduce some costs due to the reduction of overlay and repetition.

However, the sector as a whole needs to ensure that there is a continuing improvement in quality. It is not appropriate to set quality and regulatory standards without a systematic review process and methods to improve standards.

It must be considered as a reality that such a review may incur costs.

Further, as stated previously, there must be an acceptance that indicators of quality, such as low child-staff ratios, staff qualifications and quality regulation will incur a cost to the delivery of the service but are essential to the quality of the education provided.

Significant commitment to increase funding toward early childhood education and care is still necessary from the Federal Government if we are to guarantee high quality education and care for Australian children.

IMPLEMENTATION

10. What do you consider to be the key advantages and disadvantages of the proposed reforms?

The major advantage in the implementation of the proposed reforms is that all Australian children will have access to quality early childhood education and care.

Further, the consistent application of quality standards throughout Australia will ensure that all services are assessed against equal benchmarks and a reduction of red tape and duplication of documentation.

11. What do you consider to be the key challenges associated with the implementation of the proposed reforms?

The attraction and retention of qualified early childhood education teachers will be the main challenge to the implementation of the proposed reforms.

While efforts are being made to encourage uptake of early childhood education university and TAFE studies, the significant discrepancy between the wages and conditions of early childhood teachers working in community kindergartens, long day care centres, preschools and primary schools remain the major problem for the sector.

Teacher's salaries and conditions are considerably lower than those of their peers in schools.

It is essential that Governments take steps to ensure that there is wage parity between teachers working in schools and early childhood teachers.

Secure employment, comparative salary and conditions and access to professional development must be provided if the staff recruitment and retention issue is to be overcome.

12. What factors may impact on the ability of ECEC services to implement the reforms?

Currently the majority of childcare services are for-profit.

The IEUA has some concern that the 'profit' model will continue to reduce costs at the expense of quality to ensure profit.

In the past, IEUA members have had experiences including reduced hours of work, lack of paid lunch breaks (in contravention of the relevant award), attempts to coerce members to circumvent the regulations such as telling them to perform administration and cleaning tasks whilst supervising children and employers who have reduced the number of children in attendance to avoid employing a university-qualified teacher.

The IEUA believes that it is essential to ensure an appropriate mix of “for profit” and ‘not for profit” services exists within the community and this can only be achieved by efficient Government planning.

13. What transition arrangements do you consider appropriate for implementing the proposed staff-to-child ratios and staff qualifications?

There is a need to ensure staff are given opportunities to improve their qualifications.

The IEUA believes that, along with support for upgrading of qualifications, the regulatory standards must allow for the continued employment of experienced three year trained early childhood teachers for a transitional period.