

# The Commission for Children and Young People and Child Guardian

promoting and protecting the rights, interests and wellbeing of all Queenslanders under 18

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**Advice to:** Ms Joan ten Brummelaar, National Early Childhood Developmental Steering Committee Secretariat, Department of Education, Employment and Workplace Relations

**Topic:** Regulation Impact Statement for Early Childhood Education and Care Reforms, COAG Consultation RIS

**Date due:** 31 August 2009

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This document provides comment from the Commission for Children and Young People and Child Guardian (the Commission) on the Regulation Impact Statement for Early Childhood Education and Care Quality Reforms, COAG Consultation RIS, provided by the Early Childhood Development Steering Committee.

## Summary of the Commission's response:

1. the Commission agrees with the approach of implementing consistent minimum standards across Australia
2. the best outcomes for children must be at the forefront of reforms
3. reforms will need to be introduced through a staged and lengthy process, especially the upgrade to staff qualifications and ratios
4. the support of disadvantaged children should be embedded into these reforms, and
5. the Quality Rating system should be transparent with power to impose sanctions if services do not meet quality requirements.

## 1. Implementation of consistent minimum standards of care across Australia

The Commission agrees with the approach of implementing consistent minimum standards across Australia. As well as being an opportunity to review and upgrade the quality standards it:

- will prevent the duplication that exists in the current system that involves different regulatory systems administered by both the Australian and State governments. This in turn will be more cost effective as there should be only one set of administration
- should be more efficient for the child care staff and relieve some of the burden of preparation of evidence and time taken for assessment in the current dual system, and it
- should also be less confusing for parents if they move from one state to another

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## **2. The best outcomes for children should be at the forefront of reforms**

The fundamental consideration at the basis of these changes should always be the needs of children. It is well known that young children can benefit from the child care experience but it has also been shown that poor quality child care can be detrimental to children's early development.<sup>1</sup>

The COAG Consultation RIS acknowledges that these reforms will result in cost increases. However, the Commission believes that the quality of child care should not be negotiable and failure to ensure quality will cost the Australian economy more in the long term<sup>2</sup>. Australia's long term productivity relies on children being given every opportunity to be productive and contributing citizens in the future. This reinforces the importance of investment in supporting parents in their parenting role. It incorporates the provision of quality early childhood education and care as well as the option for paid parental leave so families have real workforce participation choices.

## **3. Reforms will need to be introduced through a staged and lengthy process, especially the upgrade to staff qualifications and ratios.**

Comments expressed at the public forum in Brisbane indicated that there are many concerns from the early childhood industry about the cost of the proposed reforms and what it might mean for individual child care services. The focus of the Australian government on quality, which has been demonstrated to depend, in part, on child-staff ratios and staff qualifications, must not be compromised. Ways must be found to improve quality as well as ensure the early childhood industry remains viable.

The introduction of these reforms will need to be a staged and lengthy process and it may well be that after some reforms, more information gathering is required in terms of consumers' perspectives and achievement of the required quality standards. There will be a need to review progress regularly to fine tune implementation. Issues such as strategies to retain, train and attract suitably qualified staff, and attract back those who may have left the industry, in order to meet the proposed new standards, will require time and increased funding. The system for formal recognition of the skills that current staff have acquired during their working life, outside formal education and training should be used to enhance pathways to attaining a university degree as well as in the vocational education system.

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<sup>1</sup> Sims M, Guilfoyle A and Parry T(2005). What cortisol levels tell us about quality in child care centres. *Australian Journal of Early Childhood*, 39(2):29:39

<sup>2</sup> Arthur J. Reynolds, Judy A. Temple, Dylan L. Robertson, and Emily A. Mann (2001) Age 21 Cost-Benefit Analysis of the Title I Chicago Child-Parent Center Program Executive Summary, June 2001. <http://www.waisman.wisc.edu/cls/cbaexecsum4.html> Accessed 24 August 2009.

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Staff should not be allowed an indefinite time period to attain the required qualifications as could be inferred by Section 5.3.1 in the COAG Consultation RIS. To ensure qualifications are achieved within a timeframe, staff should be allowed the prescribed finishing period of time to upgrade or achieve qualifications and then the provision for staff to be enrolled in appropriate courses needs to be removed as an option. Just as schools are not permitted to operate without a trained teacher, early childhood services should not be permitted to operate without suitably trained staff. That being said, it is acknowledged that in regional and remote centres, attraction and retention of qualified staff may be a particular concern. Strategies and further incentives, such as flexible training options to train and employ local people and mentoring and coaching programs, may need to be developed to address this issue.

#### **4. The support of disadvantaged children should be embedded into these reforms.**

The Commission is charged with protecting and promoting the rights and wellbeing of all children but particularly those who are most vulnerable. Although *Supporting disadvantaged children* is mentioned in the COAG Consultation RIS (Sections 2.3 and 6.4), in terms of the benefits that can result from quality early learning and care programs, there is little further discussion in the remainder of the document about how these children will be encouraged and supported to participate fully in the early childhood education and care.

There should be a focus on the integration of services and the development of referral pathways, involvement of parents and support for disadvantaged families and those with special needs. Links with other local programs such as Communities for Children are important for the integration of services. Such features should be built into the quality standards.

Some of the most successful early childhood programs for disadvantaged children in the US (Parents as Teachers<sup>3</sup>) and the UK (Sure Start) also include home visiting programs. Home visiting is another option for consideration to ensure disadvantaged children are provided with sound evidence based practice to ensure the best possible outcomes for all children. Articulation in the new quality standards of the need for strategic links with, for example, the Home Interaction Program for Parents and Youngsters (HIPPY) in the areas where HIPPY is being rolled out would be beneficial.

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<sup>3</sup> Zigler, E, Pfannenstiel, J and Seitz, V (2008) The Parents as Teachers program and School Success: A Replication and Extension, *J Primary Prevent* 29:103-120

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## **5. The Quality Rating system should be transparent with power to impose sanctions if services do not meet quality requirements.**

All parents want to enrol their child in the best quality services, but other issues such as location and cost are also important for parents.

The Commission agrees that there should be an 'Operating Requirements' rating which applies to new services or services working towards to meeting quality standards. However, there should be a strict time limit for these centres to reach a quality rating.

Established centres should be rated as operating at the National Quality Standard or not meeting this standard i.e. quality centres or not quality centres. To overcome the issues with lack of differentiation in quality that was apparent in the National Childcare Accreditation Council accreditation process, there should be a transparent rating process and the detailed results across the whole range of standards/principles be made available to parents. Parents would then be aware of the areas where a service is not meeting the expectations and could expect improvements with time.

Centres that do not achieve a quality rating should be assisted to meet this rating within a time frame. However if the service is unable or unwilling to make the necessary improvements, there needs to be some sanctions that can culminate in the cancellation of licence if necessary. The enforcement of threatened removal of license/accreditation for those centres that do not meet the quality standards is essential if the process is to have integrity. It is unacceptable to allow centres that do not meet requirements to continue to operate, despite local concerns about the removal of services, as has occurred with the current accreditation process<sup>4</sup>

The rating of a centre as 'Excellent' should be outside of the regulation/licensing process and not be a part of the rating system. It should be a separate process, through which services that excel in some way should be recognised by a nomination and award process. Again the process and content of this award should be transparent and be openly available to parents.

Please do not hesitate to contact Julie Appleton, Senior Research Officer, Strategic Policy and Research Unit (ph: 3211 6962 or e-mail Julie.Appleton @ccypcg.qld.gov.au) should any aspects of this advice require clarification.

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<sup>4</sup> National Childcare Accreditation Council,(2009) Submission in response to Senate Inquiry into the Provision of Child Care.  
<http://www.bing.com/search?srch=106&FORM=AS6&q=Submission+in+response+to+Senate+Inquiry+into+the+Provision+of+Child+Care>. Accessed 19 August 2009.