

# Family Day Care Australia (FDCA) response to discussion paper: *A national quality framework for early childhood education and care*

COAG Productivity Agenda Working Group – Education, Skills, Training and  
Early Childhood Development

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## OUR INTEREST

Family Day Care Australia (FDCA) is the national peak body for family day care, an Australian Government approved home-based child care service operating in all states and territories. FDCA represents over 11,000 family day care carers and 320 coordination units and their staff, operators and families. It is the view of family day care stakeholders that family day care sits firmly within the Australian Government's reform agenda for early childhood education and care.

Appendix A sets out the names and origins of those involved in the development of this response to the COAG discussion paper.

## INTRODUCTION

Family day care is an early childhood education service that blends care, development and early learning within small group settings that facilitate social competence in children aged from birth to twelve years. Children are nurtured and cared for in the homes of approved family day care carers who are supported, monitored and trained by early childhood professionals from a central coordination unit. The network of carers, staff, operator and families is collectively referred to as a 'family day care scheme'. Most carers work within a self-employed model which enables them to set their own fees, hours and service inclusions to best meet the needs of local communities. A relatively small number of carers in the ACT and Victoria are employees of the scheme.

The flexible nature of family day care enables the establishment and maintenance of community linkages for families and children, such as pre-school, extra-curricular activities and health services, which might not otherwise be accessible. It is often the only formal child care service able to deliver high quality child care to families in rural and remote Australia.

Recent research has highlighted the importance of less structured aspects of early childhood learning on children's readiness for school. These aspects of early childhood learning include: social competence, physical health, emotional adjustment, language, cognitive skills and general knowledge. Some believe that the single best childhood predictor of adult adaptation is not being able to read or add up numbers, but the way the child gets along with other children. The smaller family day care environment provides an excellent opportunity for children to develop social competence, physical skills, emotional adjustment (being able to sit and listen, talk to adults, follow basic instructions), as well as the traditional school readiness requirements of cognition, language and general knowledge and self help skills. Larger group activities such as playgroups, library visits etc., may also be provided by family day care carers for the children in their service.

The family day care sector welcomes the Australian Government's reform agenda through COAG and endorses the aspiration that *'children are born healthy and have access, throughout early childhood, to the support, care and education that will equip them for life and learning, delivered in a way that actively engages parents and meets their workforce participation needs'*. FDCA members are keen to provide input into strategies which seek to further professionalise the early learning sector; remove duplication by bringing together regulatory and quality standards with early learning; and introduce universal access 15 hours of pre-school a week delivered by four year degree trained teachers to children in the year before formal schooling.

FDCA acknowledges the need for early childhood services to focus on learning and development to enhance outcomes for children now and in their later years. We absolutely support Australian and international research that clearly shows the links between high quality care and optimal health, education and developmental outcomes for children (Sims 2007; Sammons et al 2007) and will work with the government to ensure that family day care meets, and where possible exceeds, appropriate benchmarks for quality care and education within a nurturing home-based environment.

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## NATIONAL QUALITY FRAMEWORK

### ***NQF1 – STRONG QUALITY STANDARDS***

#### ***Content***

***What do you consider to be key drivers of quality that should be included in the standards? Do you agree with those listed in section 5.2 of this paper (ie Leadership and management, Relationships between staff and children, Family and community partnerships, Differentiated play-based curriculum, Physical environment, Staffing requirements and arrangements)? Can you suggest others?***

- There is general agreement with the standards listed in section 5.2 as key drivers of quality; however there is potential duplication with current regulations of staffing requirements and physical environments in a streamlined model.
- The areas identified as requiring additional attention included children and families with specific needs and linkages for all children to health services that would ensure children's wellbeing was receiving attention from a range of professional resources.
- At the recent Early Years Conference in Salisbury, August 2008, Professor Frank Oberklaid highlighted his research around brain development:
  - Nurturing and responsive relationships build healthy brain architecture that provides a strong foundation for learning, behaviour and health
  - The relationships a young child has with their care professional(s) literally sculpts the brain and determines the development of circuits
  - When protective relationships are not provided, levels of stress hormones increase – this impairs cell growth, interferes with formation of healthy neural circuits, and disrupts brain architecture
- This reflects a need for the key drivers to be weighted (higher) differently and should include influences such as:
  - Secure attachments including sibling attachments
  - The facilitation of secure transitions for children between home, care professionals and other services.

***How should the increased focus on early childhood education and care and outcomes for children be reflected in the new standards?***

- A key feature of the new standards would be the development of similar indicators with the addition of some specific indicators that ensure the integrity of service types, eg Physical space will be different in family day care, centre-based long day care and pre-school.
- Consistency across service types and locations could also be supported by a single reporting document measuring outcomes for the child; however this should be valid system supported by current early childhood principles and not be reduced to a tick a box system. This document could stay with the child, transferring across service types and ultimately contribute to the Australian Early Development Index which measures how well communities are contributing to the five areas of early childhood development (AEDI – Royal Children’s Hospital Melbourne 2008).
- In relation to measuring outcomes it is proposed that:
  - a consistent national date by which every Australian child is considered eligible to enter pre-school be introduced; and
  - consistent national language in relation to care and education environments be developed to assist parents transferring children between states and programs.

**Coverage**

***What are the considerations in applying an integrated set of standards across all service types, including family day care, outside school hours care, Indigenous services, etc? Possible considerations: health and safety, physical environment and staffing standards in different settings, integrating preschool and child care.***

- The standards must be flexible enough to meet the needs of all children and every circumstance including ensuring the maintenance of competence stemming from the child’s cultural background.
- A child’s social and emotional development benefits greatly from challenging or risky play that enables them to learn to manage their own risks. A culture that focuses on avoiding risk can inhibit overall resilience and leave children unprepared for life skills that are vital for adulthood (Gleave 2008). FDCA recommends a national approach enshrined in an integrated system that seeks to manage rather than eliminate risk.
- FDCA recommends an integrated model where the skills of coordination unit staff would include TAA, ECEC and Diploma qualified staff to ensure the successful implementation of the early learning framework across the family day care sector
- The standards need to support learning by minimising stressors for young children in transitions across learning contexts, home-childcare-preschool-extended family/ friends.

***Would a core set of standards supplemented by service-specific standards overcome these barriers? For example, a modular approach which sets out a common core set of principles, supplemented by specific modules for each service type.***

The example provided of a modular approach which sets out a common core set of core principles supplemented by service specific standards or modules for each service type is supported as there are clear differences between service types, eg physical environment (a family home compared with a purpose-built centre or school hall) that must be acknowledged.

***What other options are there for an integrated set of quality standards?***

- Two models were considered – one based on integration of quality assurance, the early years learning framework and regulations; and the other on streamlining the three areas. (Please refer to Appendix B and C).

- Both variations introduced a third layer to the model – that of a national professional [child care worker] registration board encompassing an ombudsman/commissioner role with which to deal with protection, breaches and appeals, as follows:

#### **A national child care workers registration board**

The status and standing of care professionals could be improved by establishing a national child care workers registration/licensing board to maintain a register of 'fit and proper' care professionals and issue cards to approved child care workers across all service types.

By moving such determinations to a statutory authority to whom child care workers respond, maintenance of all approval requirements including first aid, health checks and completion of training; if provisional approval is extended on that basis, such a process could ensure greater mobility for care professionals as well as safety for children.

- Included in approval processes should be free working with children checks police checks with national transportability.
- Notation of qualifications and years of experience/registration.
- Period – up to 3 years for validity of cards until next approval required.

#### **Complaints and appeals**

All carers/coordinators should have the opportunity to respond to any complaint, action or judgment made against them through:

- a national process that is transparent and follows natural justice principles
- an independent national body that hears appeals of carers who have been found to be non-compliant and ineligible to operate as an approved carer.

The process should differentiate between 'types' of breaches and the consequences.

If the current situation of 8 different regulatory regimes continues an appeals body in each state and territory is required.

#### ***How could the standards take account of the age of children?***

- Standards could support children of all ages by ensuring that cultural and social contexts of their learning is validated by care practices that connect the child's transitions between family, services and other learning contexts.

#### ***Impacts***

***What are the potential impacts of the introduction of a new set of quality standards on early childhood education and care services? Possible considerations: workforce, financial viability, implementation arrangements, service provision.***

- The introduction of new quality standards, and integration or streamlining of the early years learning framework and regulations, is seen as an opportunity to resolve issues with current standards and processes and remove duplication. However, there is also the potential for family day care to lose care professionals through an insufficiently resourced change process; this trend is supported by past experience where significant exits have occurred at eg major changes to the current quality assurance system. The viability of schemes and their capacity to continue to operate high quality services must be supported by appropriate resourcing.

Therefore it is considered that the success of the new framework would depend on resourcing all care professionals so that they could:

- access training funds with vocational outcomes

- access professional development through professional support coordinators linked to vocational outcomes
- access to WELL and other TAFE / RTO resources that ensure carers of CALD backgrounds and Indigenous carers are supported through the training process to achieve Certificate III and Diploma level.
- access free bi-lingual resources online with copyright permissions to enable services to modify the materials and create tools; the current system of disallowing such practice has restricted innovation
- effectively introduce and work within the new system
- The formalisation of the early years learning framework within children's services will require schemes employ ECEC, TAA and Diploma qualified staff. This would have an impact on the cost of service provision and would therefore require a greater level of government funding and a commitment to training funds.

***What are the particular issues with changes to the 'iron triangle' structural indicators of quality: staff qualifications, child-to-staff ratios, and group size? Possible considerations: workforce, training, relative costs and benefits of each indicator.***

- There was concern in relation to the apparent lack of research into the fit of the 'iron triangle' in the family day care context, as it is considered that linkages between smaller group size, mixed age group composition, ages and stages of children in care and the natural environment for care are significant variables. Social research has connected optimum size of small groups for children's interactions suggesting that five children provided more appropriate social and development opportunities and outcomes for children. In centres a common ratio is 1:5 or 1:8 but the centre may have 90 children separating siblings into same age groupings. Family day care ratios are generally 1:4 (in Qld, Vic, ACT and SA) or 1:5 (in NSW, WA, NT and Tas) in relation to pre-school aged children, with no more than seven at any one time including school-aged children.
- Research also highlights the importance of less structured aspects of early childhood learning on children's readiness for school. These aspects of early childhood learning include: social competence; physical health; emotional adjustment; language; cognitive skills; general knowledge. The research suggests that the single best childhood predictor of adult adaptation is not being able to read or add up numbers, but the way the child gets along with other children. The smaller family day care environment provides an excellent opportunity for children to develop social competence, physical skills, emotional adjustment (being able to sit and listen, talk to adults, follow basic instructions), as well as the traditional school readiness requirements of cognition, language and general knowledge and self help skills.
- Healthy brain development research indicates that the best interactions for babies are continuous, consistent, back and forth interactions (Catherwood, 1999; Shonkoff & Phillips, 2000). In the family day care model this occurs due to the low group size in a single setting with a single consistent carer and limits on numbers of babies in a group are generally much lower than in other service types (exceptions include multiple births/siblings).
- All structural changes to the iron triangle have cost and viability implications. Focusing on the qualifications indicator and workforce professionalisation can create the greatest positive outcome for children and the Australian workforce with the least upward pressure on costs to government and parents. Cost effective approaches that government could consider include:
  - ensuring all training in the sector is linked to vocational outcomes
  - ensuring that TAA training scheme staff support carers during visits to facilitate documentation of practice that can feed into the recognition of prior learning (RPL) process of any registered training organisation (RTO) and so facilitate workforce professionalisation

- Professionalisation of the workers within all child care sectors should be paramount in any discussion about outcomes for children.
- A recent survey by FDCA of family day care workers seeking access to free productivity training places engendered a response from 1,594 existing workers; slightly less than half were seeking a Certificate III in Children's Services with the balance seeking a qualification at Diploma or Advanced Diploma level.
- At present a Certificate III is a stand alone qualification and a prerequisite to the Diploma. It is proposed that the Certificate III in Children's Services be combined with the Diploma of Children's Services as follows:
  - The Certificate III has 11 compulsory units and 4 electives, and the Diploma has 20 units. By joining the two qualifications, the 4 electives can be done as part of both qualifications. In this way, the government could professionalise child care workers more quickly and cost effectively, as well as give existing workers greater confidence in their capacity as students.
- FDCA advocates that as a minimum, all child care workers who have regular interactions with children should work towards obtaining a Certificate III in Children's Services by 2011, preferably through the productivity training places initiative which must be extended to include self-employed child care workers such as family day care carers who are already in the workforce.
- Training funds targeting long term, existing and self-employed workers such as family day care carers would have positive outcomes for children, create better retention and transportability of competency across the industry and lower costs to government over the long term.

#### ***Transitions to a new system***

***What transition arrangements do you consider appropriate for implementing the proposed changes? What timeframe might be required to fully implement all changes? What supports for the early childhood education and care sector do you think would assist these transition arrangements? Possible consideration: professional support program.***

FDCA is concerned with the speed of the proposed changes, particularly the short timeline between the close of the EYLF tender and the delivery of the framework for COAG review in December 2008, for implementation in July 2009. Nevertheless, we applaud the commitment of the Government to early childhood education and care and to the resultant positive outcomes for children.

In our view the transition to a new framework would need to honour current practices through:

- the provision of change management training with a 'why change' rather than a 'what is it' focus to enable the child care sector to understand the need for change, the impact of the change and the ultimate outcomes of the change for children, their families and communities
- the provision of sufficient resources to assist all child care workers and families using children's services to work with the change in an achievable timeframe
- the linking of PSC training to vocational outcomes to support a qualified sector with the capacity to deliver high quality outcomes for children
- resourcing the sector so the transition to a qualified sector is achievable in an ongoing manner. For family day care it is important that carers are established within a short time frame, ie 3-6 months.
- Focus on existing workforce and include self-employed home-based carers.

## A QUALITY RATING SYSTEM

It is considered by FDCA members that probationary licensing has a place for start up services across all sectors, but even these should be expected to operate at a suitable quality care level from the outset.

In the integrated model regulating functions of state and territory governments and validation of services have been structured within a joined up team of regulatory and NCAC functions.

### *NQF2 – A QUALITY RATING SYSTEM*

#### *Objectives*

*What do you think should be the objectives for a rating system? Do you agree with the objectives listed in section 6.1.2 (Indicator of service quality, Continuous improvement in the early childhood education and care sector, Information for families and communities)?*

The objectives of a rating system are agreed and all services should be operated from good quality.

*Which objective is the most important? For example, is informing parental choice of service the primary objective?*

The primary objective should be to communicate the benefits of the new system to parents in user friendly language, particularly how *continuous improvement* was being measured through structural changes and new roles and responsibilities.

That all QA/EYLF/Regulatory standards and indicators are demonstrable, measurable and achievable by services being delivered in a range of contexts across Australia, particularly smaller services in remote regions.

Discussion, observation and documentation should all be treated as equal evidence in the future quality assurance system.

The group also recommended the development of a Child Profile in the form of a national template to be maintained and recognised across all service types and transportable nationally.

#### *Design issues*

*What principles do you think should underpin the design of the rating system?*

- Appropriate language that supports continuous improvement and a sense of achievement over the long term.
- A framework that is flexibly applied and relevant across service types.

*How should services be rated against standards? What should the rating system look like in order to achieve its objectives? Possible considerations: measurement, attainment or other approaches, how the rating system will link to the standards, accreditation and licensing.*

- There is a continuing need for national criteria benchmarks for individual carers and services to achieve.
- Family day care carers prefer a more consistent approach to selection frequency to ensure that in the new system the same carers are not repeatedly selected while others aspire to be selected and miss out.
- There was a preference for a system of either 'compliant' or 'non-compliant' for all services and to retain an accreditation rating where all services must be operating at 'good' quality while still acknowledging services/individuals for exceptional practices in some standards.
- There should also be recognition for maintenance of exceptional standards by individual carers, coordination unit staff and services.

- In an integrated system the rating system would link across all areas of professional practice, QA, EYLF, and Regulations.

***What kind of information should the rating system provide to parents and others in the sector?***

***Possible considerations: grades of quality at each level, eg A—E, incentives for continuous improvement.***

Gratings of A-E are not supported at all. Parents need to have information that confirms that services funded by the Government are operating at good quality at all times.

Furthermore, and in relation to the child, the rating system communicates little in relation to outcomes and progress for either the parent or other professionals including those in health services and pre-schools.

***What potential risks are there in introducing a rating system? How could potential negative implications be minimised?***

There were concerns:

- that parents might withdraw children or choose not to put children into care resulting in lower workforce participation by women; and
- that not all carers who want to be are validated due to limits on resources; some have suggested this results in an inaccurate view of the quality of the whole service.

***Who should carry out the rating process and why?***

The favoured integration of NCAC, regulators and PSCs into a single new entity was seen as an opportunity to have input into a rating process from all three perspectives.

***Coverage***

***Should the rating system include all services in the early childhood education and care sector, eg long day care, preschool, family day care, outside school hours care, Indigenous services, etc?***

***What are the implications of bringing all service types under one rating system?***

Despite a lack of agreement with a rating system as proposed, it was agreed that all services should be included in the process as:

- there are positive benefits for care professionals and consistency for parents whose children move across service types and interstate; and
- it would provide families a better understanding of the choices available and better inform their decisions in choosing quality care that best meet individual family needs.

***Impacts***

***What are the potential impacts on early childhood education and care services? Possible considerations: workforce, financial viability, implementation arrangements, service provision.***

The greatest impact is considered to be the cost of resourcing the new integrated model to ensure its success. Workforce professionalisation linked to vocational outcomes in particular needed to be accounted for.

***Transitions to a new system***

***What transition arrangements do you consider appropriate for implementing the proposed changes?***

***What supports for the early childhood education and care sector do you think would assist these transitions?***

The transition to a new framework would need to honour current practices by:

- Resourcing the sector so the transitions are achievable; in particular information resources in bilingual format and training packages for carers and recruitment
- Providing additional network funds to support increases in staffing hours required for additional face to face sessions with carers, night meetings and communication
- Linking training to vocational outcomes
- A strong marketing by the Government taking all stakeholders on board.

**What timeframes are required to allow services to make the transition to a new rating system?**

An achievable timeframe is needed with a change management plan for the sector made explicit so as to ensure everyone moves across from the current quality assurance system to the new system in a supported manner.

***NQF3 – STREAMLINED AND/OR INTEGRATED LICENSING AND ACCREDITATION ARRANGEMENTS***

***Streamlining and/or integration***

***What are the current issues or problems with the existing regulation, licensing and quality assurance system?***

The following have been identified as critical to creating an efficient and responsive regulatory system:

- Retention of flexibility in meeting standards to enable capacity to respond to a professionalising sector, carer support requirements and diversely structured services.
- Removal of duplication between regulations, the quality assurance standards and the early years learning framework.
- Introduction of a national regulatory system of standards to reduce inconsistencies between state and territory regulations.

***What changes to the structure of the quality assurance system would you suggest to increase consistency, effectiveness and efficiency across service types and/or jurisdictions? How might these changes affect you or your service? Possible considerations: administration, governance and delivery arrangements, reducing administrative duplication***

A national framework for state and territory regulation should be specific to sector type and different from, but underpin, what is included in quality assurance standards and an early years learning framework enabling a flow on effect reflective of the 'whole of scheme' profile.

- regulation should be enabling so services can respond to changing community needs and family employment patterns.
- service type, location and size should be taken into consideration within a core framework that is supplemented by service specific standards.

National regulatory standards/benchmarks should form a common baseline. It is considered that the following areas require attention:

- ***Ratios, qualifications, group size and ages of children***

FDCA supports the maintenance of national standards ratios of 1:4 moving to 1:5 when this ratio is linked to a Certificate III qualification and/or one of the five children attends an external preschool program. This will ensure that all children in the smaller group size within a family day care setting have the opportunity for social interaction with children of similar age or stages of development.

FDCA supports a ratio of 1:3 for children under the age of two years where there are no other children also in care, on the proviso that a loaded rate of CCB applies to support service viability and parental access to a place for their baby in a nurturing home-based environment with one primary carer. Where there are other children in care, a ratio of 1:2 for children under the age of 18 months is supported.

Across all jurisdictions a carer's own child is registered with the family day care scheme and therefore counted in the calculation of ratios; however this arrangement is not recognised for CCB purposes. Further, a carer's child with a disability is also counted in the calculation of ratios but is not eligible for ISS support. FDCA recommends that all parents and children using formal child care services such as family day care have equitable entitlements.

- ***Consistent language***

Consistent language across all service types ensures common understanding for both workers and families. For example, the term "relief carer" in family day care is represented by terms such as primary carer, support carer, shared care, co-carers, PAIPO (person to act in place of), depending on the state or territory.

Other terminology suggested to prevent confusion included:

- Approved carer rather than contractor
- Approved homes (not necessarily where carer lives 24 hours a day but one that a carer owns or rents) rather than primary residence
- The whole premises are registered and safety standards must be applied to the whole house.
- Approved in-venue care settings

- ***Relationships***

Regulations should clearly identify areas of specific and shared responsibility of either licensed scheme or carer or both parties

- ***Relief care***

There is an emphasis on the growing importance for regulations to support family day care services to use a range of different types of relief carers relevant to their locality and needs and situations of carers. Situations could include maternity leave, sick leave, long service leave and the like.

- ***Documentation and storage of records***

A review of all paperwork requirements and responsibilities including retention periods, transfer and sharing of information with other professionals and storage protocols including electronic is necessary.

### ***Specific problems with current quality assurance system***

#### ***Indicators***

- Some indicators are open to interpretation which causes anxiety, creates heavier administrative burdens and impacts on retention rates. This is exacerbated by differences in terminology and language used from state to state for parents, community members, early learning professionals and speakers for whom English is a second language or those with low literacy levels. It is proposed that indicators are streamlined to be more specific, and all indicators are to be achievable or not applicable (due to the service structure). Every standard/indicator needs to continue to have opportunity for carers to demonstrate them either through observation, discussion or documentation, and each must have clear information of where/how that indicator can be measured.

- Regulations and policies doubling up and at times setting different benchmarks due to the overlaps between the quality assurance and regulatory systems. An integrated system for all care types plus sector specific standards is proposed.
- Limit policies to universal childcare practice

### *Processes*

- There are reports of inconsistent measures between Validators and that there is occasional conflict between dual Validators. These issues could be alleviated through more consistent training on questioning techniques which take a strengths-based approach.
- While supposedly random, the process appears to select the same carers on more than one validation visit. A solution to this could be to grant immunity to carers, ie if they have been chosen in one visit they are withdrawn from the list for the next visit. The view is that the validation experience should be shared among carers, although this would depend on the size of the scheme, and that somehow all carers within the scheme should be recognised and the team effort/partnership between staff and carers promoted and acknowledged.
- Surveys are challenging – the fast turnaround is not reasonable and families don't see the value of their involvement or have no spare time. Furthermore surveys are difficult to interpret especially those relating to school age children. It is the general view that surveys do not add any value to the quality assurance process and should be abolished in the new system. Alternative modes of assessment included phoning ten families/ten carers, and highlighting comments from children and parents in field reports as evidence.
- The length of time to achieve an accreditation decision adds to stress; it is proposed that a decision should be made within six to 12 weeks, and that an online system for tracking the progress of the decision be implemented.
- Continuous improvement is a cornerstone of the current QA system and yet self study reports are never cross-referenced so the history of improvement for a service is not validated. It is proposed that the self studies are cross-referenced and considered by a Moderator prior to a decision.
- It is considered that a week is not long enough for written feedback after validation and it is proposed that the time for feedback should be based on the number of carers selected for validation. Further, a percentage (25%) of the number of carers within the scheme should be the basis for determining how many carers are selected (not number of places).
- The current system is a deficit based model with funds allocated from QA PSSP contractors to support 'not accredited' services rather than a strength-based approach of proactive support for all services at the time of accreditation.

### *Resources*

- The major issue with resources is the need to better support early learning professionals and speakers for whom English is a second language. Suggestions include bilingual formats for resources; translation and phone interpreting services to support discussions; recruiting Validators from multi-lingual backgrounds; downloadable resources in bilingual formats with no copyright restrictions; and the establishment of a national registration body able to assess and validate overseas qualifications.
- The lack of affordable training resources and tools for carers and the cost of quality assurance books is an issue, as is management of the stress arising from the validation process. All resources expected to be utilised by child care workers should be provided free of charge or adequate funding provided for their purchase.

### ***Models of integration and streamlining***

FDCA considered two models as follows – see Appendix B and Appendix C

1. In a **streamlined model** the current separation of roles where the state and territory governments oversee regulation and the Australian government oversees both EYLF and QA with the introduction of a child care workers registration body would continue to exist with greater clarity about the roles of each party (structure and process) sits.

The child care workers registration body would sit over both models and evolve with and underpin the workforce professionalisation strategy, contribute to recognition and retention as well as ensure the maintenance of appropriate registration status, eg police checks and first aid. It could also assess and register overseas qualifications and provide an ombudsman to deal with appeals.

- The Australian government would retain responsibility for operational/capital funding, including non-government service providers, CCB, CCTR, NCAC funding, state funding, funding for national body, and training funding.
  - The carers' registration body would be responsible for police checks, first aid qualifications, maintenance of appropriate insurance, registration status, service status, (providing information to parents about availability and services offered. This body would fit across all service types, not just family day care.
  - The state and territory body has responsibility for service delivery and planning to ensure an appropriate mix of services is available. They would also provide a dispute resolution and complaints management processes.
2. In an **integrated model** the quality standards would be redefined to integrate elements currently covered in the licensing and accreditation requirements as well as EYLF.

There would be a joined up approach to monitoring and validation with the state and territory and Australian governments.

The result for children, parents and care professionals would be a single system with departments/offices in states and regional hubs.

FDCA members support the integrated model as it is believed that this model would achieve greater efficiency and effectiveness of process, operations and clarity.

### ***Transitions to a new system***

***What would be issues for you in moving to a streamlined or integrated system? What supports for the early childhood education and care sector do you think would assist these transitions? How much time should be allowed for the sector to make the transition to the new system? Possible considerations: implementation arrangements, service provision***

- FDCA supports an integrated model but notes that in the short term streamlining was possibly more feasible. Whilst promoting and facilitating integrated service delivery, new legislation and related quality assurance standards must value and preserve the integrity of different service types.
- In either system it is proposed that there be no disadvantage with incoming changes unless the changes were supported by hard data and grandfathering transition was factored in.
- Services/operators/state and territory authorities should have the capacity to set higher standards according to local demands and culture.
- The whole industry has been managing significant and rapid change which does affect the implementation of new changes particularly if they are not seen as tangibly beneficial.

- With regard to timing, it is considered that the goal is worthy of ensuring every service had adequate time to move comfortably into the new framework perhaps by continuing current QA validation cycles and services being provided options to move to the new framework within a 2-3 year period after its introduction. The nature of family day care with its central coordination unit and dispersed child care workers contributes to a lengthier timeframe which must be recognised.
- Training for carers should be funded through the new process as this will be a critical factor in the successful implementation of the new system; the cost of implementing change in staff hours, overtime and out of hours training will be significant.
- There are concerns that discussion paper has not adequately included family day care and other types of children's services, potentially signaling an undervaluing of the discourses of care professionals outside of the centre-based long day care and pre-school sectors. This omission needs to be addressed to ensure everyone is included.

#### ***NQF4 – WORKFORCE***

Family day care carers are experienced, their competence needs to be respected, valued and recognised through equitable access to the productivity places program and other government supported training programs.

#### ***How could the status and recognition of the early childhood education and child care workforce be raised?***

It is proposed that:

- a national marketing campaign led by government would be the most effective way to raise the important profile of family day care along with other service types and the role they play in the ECEC environment.
- clearer career and training pathways should be established.

#### ***What could be done to address limited advancement options and career paths?***

It is proposed that:

- career and training paths could be advanced through a nationally recognised process that acknowledges the experience of family day care workers in the ECEC environment.
- a fact sheet be developed to empower carers to approach RTOs to determine their capability to deliver, support and recognise a family day care worker's experience and competence.
- implementing a professional development regime using PSCs to link all training to units of competency to facilitate and assist the Recognition of Prior Learning (RPL) process.
- coordination units' documentation be promoted and made available for carers to facilitate the Recognition (RPL) process (eg home visit documentation, third party verification etc)

#### ***What possible approaches could be used to improve retention strategies?***

- In relation to positive practices that valued family day care professionals, the most critical elements in retention are:
  - positive working partnerships/relationships via consistent and ongoing consultation and engagement; and
  - an inclusive approach to recruitment and supporting carers to access additional mentoring, resources and advice.

- Coordination units are considered critical to ensure retention and sharing of new thinking and new practice. They are also actively involved in supporting and encouraging carers to gain higher qualifications.
- Additional strategies suggested included:
  - Developing a national exit survey template based on recruitment and retention research (eg Tere Vaka and SA DECS)
  - Implementing a national research project into strategies that encourage movement of carers across the different early childhood sectors.

***What strategies could be adopted to increase the numbers of Indigenous child care workers and teachers?***

FDCA supports consultations with community leaders to achieve workable home-based care models that reflect the local Indigenous culture, behaviours and values and ensuring employment opportunities in peak bodies.

***What is the likely impact of any suggestions on the price of and demand for services?***

- If existing workers are not supported to access free training there will be an increase with associated costs of training which is likely to have upward pressure on costs of care. Where government subsidises training this upward pressure on prices would be minimal.
- The suggestions supporting the professionalisation, recruitment and retention of carers would contribute to positive outcomes for the whole industry, as carers would be empowered to move across sectors rather than leave the industry altogether.

***What possible approaches could be used to address shortages of early childhood professionals in regional and remote areas, long day care services and community preschools?***

- Incentive packages for rural and remote early childhood professionals would make the positions more attractive.
- Promoting the regions and investing in a diversity of integrated services could also provide more career options and pathways for care professionals, encouraging professional development and using the expertise across a range of service types.

## **EARLY YEARS FRAMEWORK**

### ***EYLF1 – PURPOSE OF THE FRAMEWORK***

***What philosophy would you want an Australian framework to use? (eg would it focus on ages and stages of development; a socio cultural approach; or domains of learning, eg physical, social, emotional and cognitive?)***

- There is merit in each approach; however it is considered that a framework should support play-based learning combining intended learning with the interests of children. Therefore the a socio-cultural approach was determined as more holistic and reinforced the importance of children's local community context, natural environment and importance of secure attachments and connections as underpinning any other domains of learning.

***What form or format should the Early Years Learning Framework take that would be most useful to you in guiding your programming for young children?***

- A format that combines both intended learning with child centred learning practice.

***How prescriptive do you think the Early Years Learning Framework needs to be? Do you have a preference for the actual length of the framework?***

- Size needs to be linked with purpose and audience; early learning professional, parent or community. In all cases shorter documents in plain English were favoured with sector specific information for each stakeholder.
- The document needs to be broad enough to inspire, short and succinct enough to encourage engagement and to become an everyday document.
- Where the documents are targeting early learning professionals and parents, bilingual formats are also recommended.

***What type of supporting documents/resources would be most valuable for parents and others working with young children (eg family day carers, playgroups)? Do you have any views on the format and size of such documents?***

- As noted earlier, bilingual formats that are electronically available with possibility of multi-language recordings, particularly for parents where it is common for first language speakers to have an oral tradition rather than be literate.
- Early learning professionals rely on a range of supporting materials to resource their learning environments. Accessibility to freely available and useful resources is important and electronic delivery can achieve this objective with greater efficiency.

Documents and resources should include:

- An outline/overview document – explaining the framework to community of stakeholders
- The EYLF itself
- A workbook that allows recording of self-reflection/ plans for improvement and evaluation – an ongoing tool.

***Do you see any issues with the implementation of the Early Years Learning Framework in all education and care settings from July 2009? What suggestions would you offer to overcome these issues?***

- The phasing in of a formal structure from mid 2009 was considered ambitious, with July 2010 proposed as more achievable.
- Implementing a sound change management process that supports schemes in ensuring a smooth transition for all care professionals and costs associated with the transition would need to be factored in.
- There is more concern that the process of communication and transition inspires the nation taking both parents and the sector towards a new vision for early learning in Australia and its formalisation within the quality assurance system. On this basis it is recommended that a strong advertising campaign support the strategy across all regions of Australia. The promotion also needs to take account of parents and whole communities and their important role in supporting the education of young Australians.

***EYLF2 - QUESTIONS RELATING TO RESEARCH FINDINGS***

***Is the analysis of the trends in the literature accurate and comprehensive? Are there any other issues in the research relevant to the development of the framework?***

- It is agreed that the document captures current trends in the literature. The issues identified as not included were secure attachments which underpin brain research/stress (eg the research of Dr Sharne Rolfe) and children's rights to retain first language/s and/or attain second languages.

***Do you support a focus on language and communication development, social development and play-based learning in the framework?***

- This approach is supported within four key principles or areas: a natural environment, holistic learning, meaningful partnerships and best/professional practice.

***How would you define the roles of the educator and the child in the learning process in the framework?***

- The role of the early learning professional is one of ensuring the active engagement with children in the learning process, that their interests are honoured and constantly feature within the context of intended learning.

### ***EYLF3 – FOUNDATIONS FOR THE FRAMEWORK***

***What would you want included in the framework's vision for early learning and children?***

Recognition of:

- childhood as an important time in its own right (not just preparation for the next stage, eg school)
- the child as a competent and self directed learner
- a child's right as an active learner from birth who determines the pace and focus of their learning (rights based rather than needs based)
- the need for all children to be inspired to reach their full potential

***Would you support the values and rights proposed to underpin the framework?***

- Yes, with the addition of the right to retain first language/s as integral to retaining their cultural identities and their right to play with siblings within care.

***What other values or rights would you want included and why?***

- A child's right to be cared for:
  - in a natural setting (real grass, real trees and plants)
  - in a small group
  - in a home environment
  - continuous engagement with one early learning professional throughout each day
  - care that supports the whole family and includes siblings, in similar and mixed ages in small groups where children interact and learn from each other
  - opportunities for the development of language, literacy and numeracy through real-life experiences in a relaxed unhurried manner.

These rights are important as many parents choose family day care because these features better support their children to reach their potential

### ***EYLF4 – BUILDING THE FRAMEWORK***

***How should the curriculum framework provide guidance and strategies to meet the various learning and development needs of children including those with special needs, English as a second language, and/or challenging behaviours?***

- By providing examples of current best practise in a range of care contexts and dynamics.

- Creating indicators/standards that are all inclusive from the beginning rather than add-ons for specific needs.

***Is it appropriate for a child's learning to be assessed? If yes, how should children's learning and development outcomes be assessed?***

- The term "assessed" is questioned, with a preference to documentation and communication around children's learning and development which would include parental comments and observations over periods when a child was in care. This could take a range of forms including children's work, photos, recordings etc in a relaxed approach that recognises a single carer's time and capacity to complete a lot of additional work.

***How would you ensure the curriculum framework is appropriate for all educators, regardless of qualifications?***

- Government funded training and a positive communication strategy that can be applied across all service types and regions, and enables all workers (self-employed and employees) opportunities to receive training on the new system before implementation and regularly during this three years.
- It is acknowledged that workforce professionalisation is expected to take several years before the government's aspirations for children to be cared for and educated by qualified professionals is likely to be achieved. In the interim the greatest assurance is accessible information in plain English that reaffirms the importance and capability of the current workforce to quickly gain shared understanding of the EYLF and confidence in meeting the requirements.
- In addition the framework should have extra/optional areas whereby a qualified and skilled carer could extend themselves.

***What kind of professional development will need to be provided in order to support educators in using an Early Years Learning Framework?***

- To facilitate the transition of early learning professionals across sector types, there would need to be support for them to understand not only the EYLF but also how to effectively implement it across a range of sector contexts.
- In family day care, the ECEC educators within each scheme would require mentoring and modelling competencies that connect with adult learners to ensure that carers are resourced effectively to deliver the EYLF outcomes.

## REFERENCES

- Catherwood, D. 1999. *New views on the young brain: offerings from development psychology to early childhood education*. *Contemporary Issues in Early Childhood*, 1(1), 23-35.
- Gleave, J. 2008. Literature review: *Risk and play* (summary). Play England at <http://www.playengland.org.uk>
- Sammons et al. 2007. *Influences on Children's Attainment and Progress in Key Stage 2: Cognitive and social/Behavioural Outcomes in Year 5*, at [www.ioe.ac.uk/projects/eppe](http://www.ioe.ac.uk/projects/eppe)
- Shonkoff, P. & Phillips, A. (Eds). (2000). *From neurons to neighborhoods: the science of early childhood development*. Washington, DC: National Academy of Sciences
- Sims, M. 2007. The determinants of quality care: Review and research report. IN E. Hill, B. Pocock & A. Elliott (Eds.), *Kids count: Better early childhood education and care in Australia*. (pp 220-241). Sydney University Press.

Family Day Care Australia, in collaboration with state family day care associations and representatives from the territories, established four working parties to consult on the COAG discussion paper: *A national quality framework for early childhood education and care*.

The process resulted in four discussion papers which were then considered at a 14 member State Associations National Meeting, followed by exposure to, and discussion with, delegates from all states and territories at the 2008 FDCA National Advisory Meeting held in Hobart, Tasmania over the weekend of 13-14 September 2008.

**We acknowledge the work of the working party participants in this process, and thank them for their valuable contribution.**

#### *Quality standards and rating system:*

State	Representative	State	Representative
South Australia	Michelle Bezzina	Tasmania	Vonda Donovan
New South Wales	Debbie Tuckey	Australian Capital Territory	Julie Berry
Victoria	Jennifer Broadbent	Northern Territory	Ellie Richards-Carpenter
Queensland	Sandy Bell	Western Australia	Coral Finlayson

#### *Regulatory approach*

State	Representative	State	Representative
South Australia	Janne Todd	Tasmania	Lyn Chapman
New South Wales	Cheryl Doyle	Australian Capital Territory	Julia Clayton
Victoria	Eileen Buckley	Northern Territory	Sarah Lloyd
Queensland	Elaine Hardwick	Western Australia	Sue Robertson

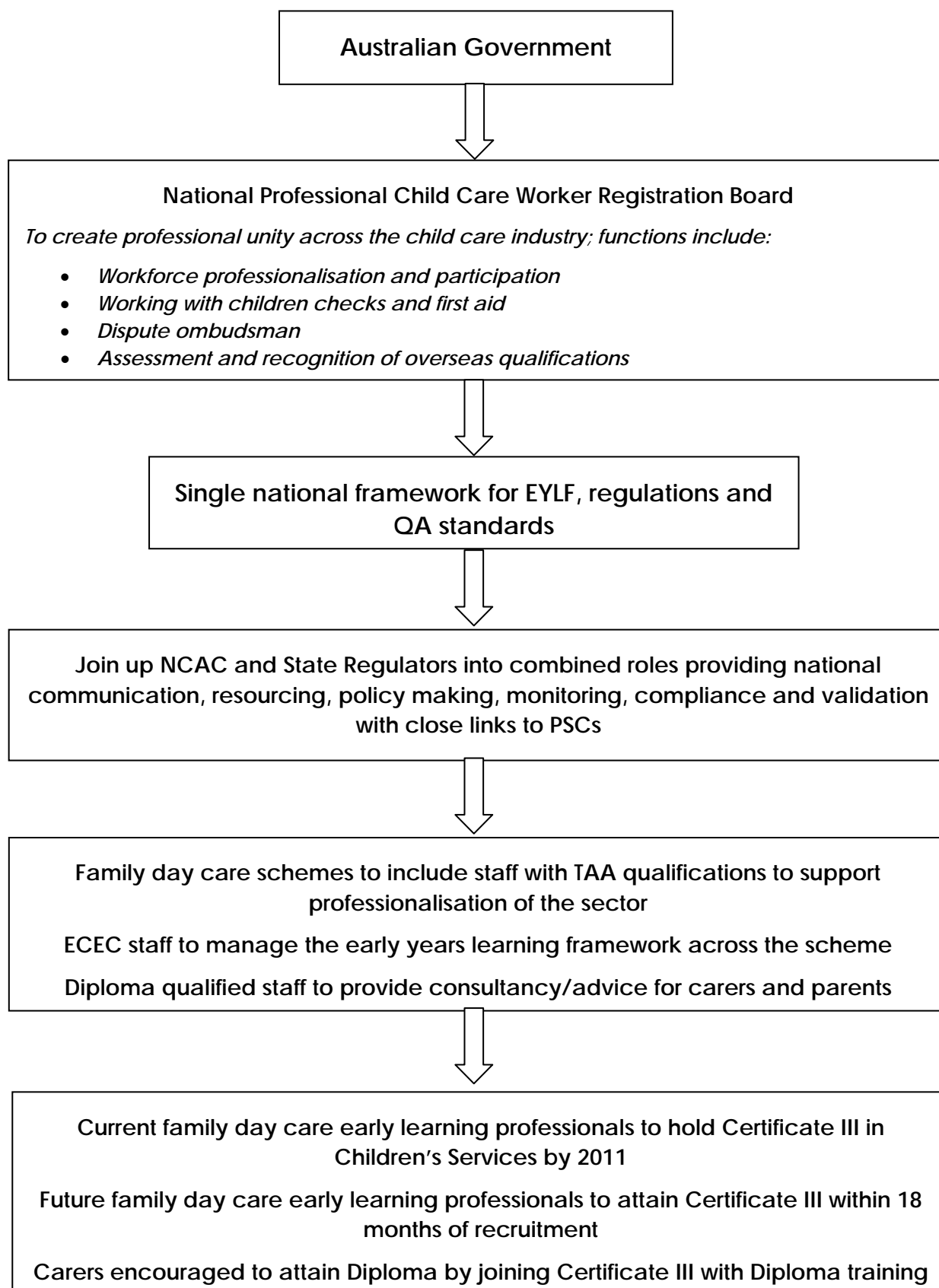
#### *Workforce participation and professionalisation*

State	Representative	State	Representative
South Australia	Gaill Layton	Tasmania	Steven Yates
New South Wales	Robert Barbara	Australian Capital Territory	-
Victoria	Louise Dorrat	Northern Territory	-
Queensland	Helen Moorhouse	Western Australia	Jo Cox

#### *Early Years Learning Framework*

State	Representative	State	Representative
South Australia	Sonia Menzell	Tasmania	Kim Abbott
New South Wales	Kellie McNamara	Australian Capital Territory	Kim Campbell
Victoria	Donna Evans	Northern Territory	-
Queensland	Lynne Kafoa	Western Australia	-

## Integrated Model



Streamlined Model

**STREAMLINED**

