

**IN THE FAIR WORK COMMISSION**

**Matter No.:** AM2018/18 and AM2018/20  
**Re Application by:** Australian Childcare Alliance Inc. & Ors  
4 Yearly Review of Modern Awards (commenced under s.156 - *Fair Work Act 2009* (Cth))

**AMENDED STATEMENT OF KARTHIGA VIKNARASAH**

I, Karthiga Viknarasah, of [REDACTED], affirm as follows:

**Background**

I am a Director of Choice Childcare Holdings Pty Ltd trading as Choice Preschool Kindergarten (**Choice Centre**).

1. I am also the Director of Lidcombe Preschool Kindergarten (**Lidcombe Centre**), which is a family business by way of a partnership between my mother and father.
2. Alongside this, I am also an executive Committee Member of the Australia Childcare Alliance NSW (**ACA NSW**).
3. Lidcombe Preschool and Choice Preschool (**the Centres**) are both long day care centres. The Choice Centre also offers kindergarten programs as well as out of school hours care programs.
4. My mother is the approved provider and has owned the Lidcombe Centre for 30 years and the Choice Centre for 25 years respectively.
5. I hold the following qualifications:
  - (a) Bachelor of Business (Accounting), Australian Catholic University;
  - (b) Certificate III in Children's Services, Community Childcare Cooperative;
  - (c) Graduate Diploma in Education, University of South Australia;

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- (d) Masters Degree in Educational Leadership, Macquarie University;
  - (e) Certificate IV in Training and Assessment, Inspire Education; and
  - (f) Certified Practising Accountant (**CPA**).
6. I have always had some involvement in the family business, but prior to my formal appointment as a Director to the Centres; I worked as an accountant for 10 years before first obtaining my Certificate III and then going back to university to retrain as a qualified teacher.
  7. For the last 10 years, I have been both the Director and Educational Leader at the Centres.
  8. Since 2017, I was a member of the Accreditation Supervisor Working Party. I am one of the first NSW Education Standards Authority (**NESA**) accreditation supervisors for early childhood teachers.
  9. I was a member of the Western Sydney University's early childhood roundtable group and I attend the NSW Department of Education reference group's meetings on behalf of ACA NSW.
  10. I am a member of the Editorial Committee for the Australian Educational Leader Journal. This Journal is released quarterly and is recognised nationally and internationally as a practical journal for the exchange of current research, trends and innovations in the education sector.
  11. I also write articles for the Australian Council of Educational Leaders' Resources in Action for Early Childhood. Resources in Action, is a fortnightly leadership and teaching companion providing succinct, contemporary and focused tips and strategies to support beginning teachers to established educational leaders.
  12. In 2018, I was the recipient of the "New Voice in Early Education and Care" Award and scholarship by the Australian Council of Educational Leaders and Australian Children's Education & Care Quality Authority (**ACECQA**). This award recognises excellence in an educational leader role as well as acknowledging that the winner is a forward-thinking, relevant and responsive educator.
  13. Since 2012, my family and I have been working with a non-government organisation in Sri Lanka and have supported a number of small centres in war affected areas. Last year we opened a centre in the capital city, Colombo with the NGO. My mother has spent most of last year there

(she lives in a small room at the centre in Colombo) and has been establishing the centre. I have travelled there a couple of times and trained staff at the centre there as well as conducted free workshops for educators and teachers in Sri Lanka.

14. Given my involvement in the above roles, I believe I have gained specialised knowledge of the Early Childhood Education and Care (**ECEC**) sector.

#### **Australian Childcare Alliance - NSW**

15. The Australian Childcare Alliance (**ACA**) is a not-for-profit, member-funded organisation with a national membership of approximately 2,500 members. Our members are predominately private long day care owners and operators.
16. The individual State associations support and assist the ACA in providing affordable and accessible quality services, with each State association reporting on their specific matters.
17. In my role as Executive Committee member of the NSW association, I assist in overseeing and managing the organisation's advocacy activities on behalf of members.
18. ACA NSW also provides employment and regulatory advice to its members to assist smaller providers with regulatory and employment issues.

#### **My role**

19. As Director, I am in charge of the day to day operations of the centres ensuring compliance with the various laws including the *Education and Care Services National Law Act 2010* (**National Law**) and the *National Education and Care Regulations 2011* (**National Regulations**). I am responsible for things such as payroll, rostering and other employee matters.
20. Additionally, as an educational leader I have an influential role in promoting positive outcomes for children, the staff and their families. It is my role to collaborate and support the Centre's educators and provide the curriculum, direction and guidance needed to support our children.

#### **The Centres**

21. The Centres engage employees under the:
- (a) Children's Services Award 2010 (**Children's Services Award**); and
  - (b) Educational Services (Teachers) Award 2010 (**Teachers Award**),
- (collectively, the **Awards**).
22. My centres are considered to be 'small' in New South Wales as they are licensed for 44 children each. The largest centres in New South Wales can accommodate approximately 300 children. In my experience, the smaller centres try to have fewer than 25 children to avoid having to incur the wages cost of the requirement of having an Early Childhood Teacher (**ECT**) which can be expensive.

#### Lidcombe Centre

23. Lidcombe Preschool is a long day care centre and operates 50 weeks of the year.
24. The hours of operation are from 7.00am to 6.00pm, Monday to Friday.
25. The Lidcombe Centre is licensed for 44 children. This means one ECT is required according to the National Regulations. I will explain this in greater detail below.
26. As mentioned above, I am also a qualified ECT which helps both my centres in meeting its ratio and staffing requirements as I will explain later.

#### Choice Centre

27. Choice Preschool is a long day care and OOSHC centre and it also operates 50 weeks of the year with the same hours of operation from 7.00am to 6.00pm, Monday to Friday.
28. The service is licensed for 44 children with a condition that a maximum of 24 can be preschool age or under.

29. The Centre has 8 staff in total. There are no ECTs at this centre given there is no legislative requirement to have any ECTs when a centre in New South Wales has fewer than 25 preschool children.
30. The National Regulations require a centre with fewer than 25 children to 'have access' to an ECT for at least 20% of the time. To cover for this, I generally visit this centre at least once a week. I speak with staff on the phone almost every day as well as communicate via email regarding issues that have arisen or to share information, guidance or other educational leader duties.

#### Types of employees

31. I employ 8 staff at each service as follows:

Centre	Full-time	Part-time	Casual
Lidcombe	2	4	2
Choice	2	3	2

32. My preference is to employ full-time staff for stability, but I am flexible. Most of my employees prefer part-time employment because they are working mothers with family commitments.
33. Over the years I have seen an increasing number of mothers who work full-time or part-time both at my centres and from the parents whose children attend my centres. I have also seen that more and more staff are demanding more flexible work patterns. In my experience, I have found that many of the parents I have dealt with do not want to work full-time anymore.

#### Wages

34. My wage costs as a percentage of my business revenue equate to about 70 - 75% which is our highest cost.
35. In addition to those costs, we obviously have public liability and workers compensation insurance costs and other normal running costs such as consumables like food, craft supplies and the like which represent approximately the remaining 25% of our costs.

36. I pay my employees initially at Awards rates. However, a number of employees have been with us for over 10 – 30 years, so they have been rewarded and are now above the Awards rates. If there are available funds, our employees also receive a Christmas bonus.

### **Ordinary Hours**

#### Modern Award Requirements

37. I employ my staff on either the Children's Services Award or the Teachers Award depending on the job they perform. These Awards impact:
- (a) the maximum number of hours that I can employ them per day (8 hours);
  - (b) the maximum number of hours that I can employ them per week (38 hours);
  - (c) the set days and hours that I can roster them on (depending on the contract of employment and award conditions that apply);
  - (d) the requirement to provide 7 days notice of a roster;
  - (e) the permanent employment conditions for full-time and part-time employees; and
  - (f) the requirement to only roster casuals for temporary or relief purposes.

#### Award complexities and contradictions

38. I often find that the Awards are not simple or easy to understand. I find it confusing and difficult to try to adhere with all the requirements placed on me by the Awards as well as keeping up with the legislation and regulations which I will mention below. I also find it inefficient that every centre has to read and understand two Awards, even though Teachers could easily be covered under the Children's Services Award.

#### Extending the Ordinary Hours

39. Both centres' operating hours are 7.00am to 6.00pm. Children start arriving at the centre right on 7.00am and then continue arriving until about 8:30am. I arrange the employees so that I have one employee to open at 7.00am and the next employee to start at 7.30am. Two employees stay until the centre closes at 6.00pm (or until the last child is collected). I have found in my

experience that there is a lot of demand for me to extend my ordinary hours for a few reasons for both the parents and the staff.

*Late pick-up*

40. In my experience, working parents need longer hours of childcare for two reasons. Firstly, because I have found in the last few years that parents are working longer or different hours to the generic 9.00am-5.00pm day and secondly, because parents use public transport to travel to and from work which is becoming increasingly unpredictable.
41. To try and cover the additional costs involved and encourage parents to pick their children up on time, I charge parents \$20 for the first 5 minutes they are late and \$1 per minute after that. Unfortunately, this is yet another cost that must be put back onto the parents.
42. The reality is I rarely enforce the late penalty, but knowing that it is there and that it can be enforced, seems to work as a deterrent. I am conscious that a lot of my families are struggling with affordability of care as it is and I do not want to contribute to that. However, if a parent was regularly late I would charge them. I note that I have never charged families when the train timetables changed and caused massive delays for families travelling to and from work.
43. I am always very well aware of the Lidcombe train timetables and when they change. If there is a problem with the trains (often on hot or wet days) all the parents that commute will be late. My staff and I are very understanding of this, as it is not the parents' fault but it is a difficult situation for everyone. A lot more people are using public transport to get to and from work and the impact of delays are significant to my centres.
44. My centre also supports a lot of new migrant and refugee families. Often the mothers in these families do not drive and rely solely on public transport. My centre is 20 minutes walk from the nearest train station in Lidcombe or Auburn.
45. For those parents that do drive, I have seen an increase in traffic jams and delays on the M4 which often cause parents to be late.

46. If there is a medical emergency, myself or another staff member will often go with the parent and the child to hospital, especially if there is a language barrier and we feel that we can more effectively communicate the health issue to the hospital. The Award suggests I would not have to pay overtime for this even if it went outside of 6.30pm. However, I would always pay overtime or give time off in lieu to an employee who helped in this circumstance.

#### *Employees Staying Back*

47. In my experience, my employees have told me that they would prefer consistency of shift times. They feel annoyed by not knowing whether parents will be late to pick up their children. It is usually only a maximum of 10 minutes until 6.10pm. If the staff know that a parent is going to come very late, they will let me know and I will go and stay with the child from 6.00pm so that the staff can go home on time.
48. In my experience, employees have told me that do not want to stay back (even for time in lieu or overtime) as it is not part of their rostered and organised hours and they have their own family commitments. If a child is still at the centre after 6.00pm then I will try to drive to that centre (or my mother will, who is the approved provider) and one of us will stay with the child until they are picked up.
49. If the Centres were able to be opened until 7.00pm or 7.30pm I would consider changing my rosters to utilize the later ordinary hours.

#### *Demand for later hours*

50. A few parents at each centre have expressed to me personally that they would benefit from the centre staying open later. They asked for a 7.00pm or 7.30pm closing time. I have listened to these parents concerns and considered whether it would be viable for me to change the centres hours. Given the size of my centre, and the additional cost that would be incurred (in ratios/closing with 2 staff and overtime), I have told them this is not possible. At least one family stopped coming to my centre and I helped them to come up with an alternative arrangement which was family day care (at someone's house) where they could pick the child up at 7.30pm.



51. Choice Centre that has an OOSHC, would also benefit from a late pick up. In my experience, there is a significant demand in outside of school hours care for parents who want to pick up their children later. Those services (unless they have a long day care attached to them) only operate from 3.00pm to 6.30pm each day before costs significantly increase but parent demand does not necessarily taper off as their children are older.
52. If the ordinary hours were increased to 7.00pm or 7.30pm, I would consider changing my closing hours based on this parent demand.

*The history of my centres hours*

53. Historically, I have changed my hours of operation at Choice centre due to parent demand in the past and if the Awards extended the ordinary hours, I would strongly consider whether to change it once again.
54. When we first opened Choice centre we were open from 7.30am - 5.30pm. Then in approximately 2016, the hours became longer to reflect the demand of working parents and we stretched to 7.00am - 6.00pm.
55. In this case, we got demand from parents, conducted a survey and then amended our hours if there was a need. As both of these extensions were within the Awards ordinary hours, it made those decisions viable.
56. There is a tipping point, where if we don't have enough demand or children compared to the financial impact it is just not worth it. We need to determine:
- (a) the cost of 2 staff members staying with the children;
  - (b) the wages of those staff members (plus on-costs) which are usually higher as we like more experienced staff to close the centre; and
  - (c) overtime rates.
57. The reasons I would change my hours would be to remain competitive with other centres (so I don't lose customers) and if there was enough demand to satisfy the viability of the change.

### *Staff Meetings*

58. Another reason that I would like ordinary hours to be extended is for staff meetings. Due to the requirement to have ratios, and our educators' attention on the children - it is difficult to have staff meetings during work hours.
59. Extending ordinary hours would mean centres could spend more time training and meeting with staff during rostered work hours. Currently we have meetings while the children sleep during the day. Sometimes this means only half the staff can come or that the staff that are there are not really focused on the meeting as the children are their priority. If there were any issues with the children, those employees simply cannot attend the meeting or the meeting gets cancelled. Otherwise we have two after hours meetings each year and the employees are paid overtime to attend these meetings as they are after 6.30pm and/or their rostered hours.
60. Staff meetings are always useful to make sure we follow the best quality practice, but we work in a childcare centre, not an office, where meetings can be scheduled in during the work day. The employees benefit from discussing issues and ideas and they really can't do this effectively during the day. Because of the significant cost of hosting these staff meetings (which I believe are beneficial to the employees learning) we only have them twice a year.

### **Subsidy Change**

#### Activity Test

61. A lot my families are really struggling as they have gone from receiving 24 hours of subsidised care to 12 hours of care a week. This is because the government subsidy changed in July 2018, and the government came up with a new methodology as to how parents would be entitled to it.
62. Under the new subsidy arrangement, families who earn above \$66,958 (collectively) but less than \$351,248, need to have both parents working in order to qualify for the subsidy. For example, if the mother doesn't work and the father earns \$70,000 per annum - this family would not be entitled to any subsidy from the government at all and would have to pay the full cost of childcare.

63. These families had to make a decision as to whether the mothers (generally) returned to the workforce, even in a small part-time capacity or whether they took their children out of childcare. In my experience, the mothers usually returned to the workforce unless they had other younger children at home.

### **National Law/Regulations**

64. The ECEC sector is regulated through the National Law and national Regulations which sets the National Quality Standards (**NQS**) and the Early Years Learning Framework. Not only do we have to contend with the Awards but also with the National Law and Regulations which is a large and complex administrative task.

### Quality Area 4 - Staffing Requirements

65. One of the 7 Quality Areas of the NQF is Quality Area 4 and it relates to staffing arrangements.
66. Quality Area 4 includes making sure *‘every effort is made for children to experience continuity of educators at the service’*. This is a separate requirement to compliance with ratios and in some ways can be incompatible with the regulatory requirements because if we even have one child extra, we need to employ a casual/labour hire employee who the children may not know. Rostering arrangements (including ratios and the Award requirements) must be adhered to having regard to Quality Area 4 which mandates providing consistency of care for children.

### **Ratios**

### Educator-child ratios

67. My Centres are otherwise governed by the National Regulations in terms of the Educator to child ratios and qualifications necessary to be an Educator. In NSW there is a specified number of Educators per child that varies according to the age of the children.

68. In NSW, the Educator to Child Ratio is as follows:

Age of children	Educator to child ratio (NSW)
Birth to 24 months (0-2yrs)	1:4
Over 24 months and less than 36 months (2yrs - 3yrs)	1:5
Over 36 months up to and including preschool_age (over 3yrs - 4yrs and up to 6 years*) <small>*If they turn 4 on or before 31 July of that year.</small>	1:10
Over preschool age (over 4 yrs)	1:15

69. The ratios apply to the Centre as a whole and not to individual rooms. Therefore we do not operate according to a maximum number of children in any room to ensure we comply. For example, on Monday we may have 17 children in the 2-3 year old room and 6 in the 4-5 year old room (therefore requiring 5 Educators). However, on Tuesday we may have 10 children in the 2-3 year room and 14 in the 4-5 year room (therefore requiring 4 Educators).

#### Qualification ratios

70. All centres must have least 50% of their Educators having obtained, or be working towards at least an approved diploma level education and care qualification. The rest of the Educators are required to be holding or working towards a certificate III in education and care.
71. All of the Educators who work in my service have at least a certificate III/diploma level qualification (or are working towards one).
72. I encourage all my staff to take the initiative to comply with these requirements as a lived culture of compliance is very important.

#### Early Childhood Teacher Ratio Requirements

73. As previously mentioned, I employ one teacher across the two centres although they undertake their duties primarily at the Lidcombe Centre.

74. As required by the NSW regulations, my centres comply with the below requirements for ECTs:

Licensed capacity (approved places)	NSW requirement
Fewer than 25 children	Access to an ECT for at least 20% of the time
25-29 children	ECT in attendance 6 hours /day (if operating for more than 50 hours/week) <b>or</b> 60% of operating hours (if operating less than 50 hours/week)
30-39 children	One ECT in attendance at all times
40-59 children	Two ECT in attendance at all times
60-79 children	Three ECT in attendance at all times
Over 80 children	Four ECTs in attendance at all times

Complying with the ratio requirements at the Lidcombe Centre

75. At my centres, we tend to have fewer than 39 children in attendance per day. If I were to have 40 children attend, I would be required to have two ECTs present at all times.
76. Having 39 children creates a bit of a buffer for us in case of emergencies in circumstances where additional children attend. It also offers some flexibility for families in times of need. It also makes staffing and complying with the requirements easier as I do not need another ECT.

Complying with the law at the Choice Centre

77. As mentioned above, the regulations require a centre with fewer than 25 children to “have access” to an ECT for at least 20% of the time. I usually visit this centre at least once a week. I

Speak with staff on the phone almost every day as well as communicate via email regarding issues that have come up or to share information, guidance or other educational leader duties.

### **ACECQA Ratings**

78. Inspections of individual centres are conducted by State regulators. In NSW, the NSW Department of Education is responsible for conducting the assessments.
79. The Australian Children's Education & Care Quality Authority (**ACECQA**) oversees this and publishes the ratings of all the centres nationally.
80. The NQF governs how our centres are rated across the industry. When independent assessors attend our centres, they broadly use the quality standards to assess how we are performing under each of the categories.
81. These ratings are published online which provides parents and interested parties with an indication of how the centres are placed. Quite frankly, sometimes what assessors look at in a centre as opposed to what a parent wants for their child can be very different.
82. I devote a lot of care, skill and attention to compliance with the NQF and ensure that we have an exceptional educational program to attract families to our centres. I constantly look at ways to innovate, and I place a strong emphasis on the continuous learning of my both myself and my staff. I am currently studying a Masters Degree at University of Sydney for this reason.
83. The ratings that we are assessed against by ACECQA include:
  - (i) Excellent;
  - (ii) Exceeding National Quality Standard;
  - (iii) Meeting National Quality Standard;
  - (iv) Working Towards National Quality Standard; and
  - (v) Significant Improvement Required.

I take full responsibility as the Director for all regulatory and compliance matters. If we fail to comply with any of the regulations, there are significant penalties and our centres could get shut down.

## **Rostering**

### Preparing and Planning a roster

84. I prepare the rosters across the Centres. The part-time and casual employees work according to their minimum contracted hours on various days depending on the operational requirements.
85. Full time Educators work a 7.6 hour day. The permanent ECT will work 4, 10 hour days per week (at her request). We try to maintain the same roster for all permanent staff as a way to ensure continuity for children, families and employees.
86. I try to be as accommodating as possible with requests in relation to the setting or changing of rosters, but we are limited in what we can do because of ratio requirements under the National Law. My mother or I will often work additional hours or on different days if I cannot find another person to cover the shift.
87. I generally prepare a roster on a Thursday for the following week. We try to keep the same roster and only make changes when someone says that they need some flexibility. All the staff know I update the roster on Thursday. When I prepare the roster I already know that some staff don't want to work on certain days, some only want to work a few hours a day, etc. When employing staff, I also consider their travel time, family situations and I factor this in to the roster (for example, those that live close are more likely to be asked to do the morning shift and those that live further away will start later). Employees also come to me on Thursday or Friday to let me know what they have coming up next week. For example, if someone has to leave early next Wednesday to take their child to soccer practice then we accommodate this.
88. We have a system where employees will write their requirements on the wall calendar or the communication book. I read these before updating the roster for the following week. Sometimes they will also write that "X" has said that they can swap shifts with them. If not, I will walk up to

individual staff members and ask if they are able to change their shift on a particular day next week because “Y” has to leave early.

#### Last minute changes to the roster

89. When an employee gives me no notice that they cannot perform their rostered shift it is very frustrating but incredibly common. This happens when an employee’s car breaks down or their roof is leaking or some other family commitment arises that they forgot about (eg; a concert or parent teaching meeting at their child’s school).
90. It is so common to receive a last minute request to change the roster that my centres now follow the following (informal) process:
- (a) If an employee cannot attend a particular shift, they call their colleagues and ask to ‘switch’ shifts with them. Generally employees help each other because they may need to do the same in the coming weeks and arrangements are made by consent;
  - (b) If they are unable to switch, they contact me and I make arrangements for a casual employee to fill in.
91. My centres have employees working the following staggered shifts (there are actually a lot more staggered start and finish times but I have just included a sample below):
- (a) 7.00am - 3.00pm
  - (b) 7.30am - 3.30pm
  - (c) 8.30am - 4.30pm
  - (d) 10.00am - 6.00pm
  - (e) 2.00pm - 6.00pm
92. I find rostering difficult. It takes me up to an hour each week to try and accommodate everyone’s needs. Sometimes my employees call in sick and I have to replace them to ensure I am compliant with my ratios. Employees generally try and sort it out amongst themselves and then let me know. If they can’t find anyone then I step in.



93. The current 7 day rostering requirement under the Awards is Inflexible and impossible to adhere to. As a small business the only way to retain good staff without increasing fees (and their wages) is to be very flexible and accommodating with their needs.
94. I often have to change the rosters without 7 days notice. For example, personal leave, annual leave, compassionate leave, family emergencies, when one staff member does not turn up, or to work to fill in to ensure ratio requirements.
95. To give you an example, when I am rostering I already consider the following things: one employee has a sick husband, one is pregnant, another one doesn't like working Mondays and Tuesdays, another doesn't like to work Fridays, another studies at university. I work the roster around all these requests on a weekly basis.
96. On Thursday, everyone knows I am busy doing the roster and they all come forward with changes (often before I have even started). Everyone comes forward with things they have to do. I write them down, accommodate them and then ask others to cover (always by consent).
97. In situations where another employee cannot accommodate, I will then ask the part-timers to consent to change and then I ask the casual employees.
98. If I cannot get anyone to fill in - then I will have to cover the shift for ratio and qualification reasons.
99. Last minute changes are even harder to accommodate. For example, if one of my employees is rostered on for the morning (with a 7.00am start), but falls ill - they will call me at approximately 6am/6:30am and I need to find a replacement. The reality is I cannot give 7 days' notice, or even 1 hours notice. In these cases I usually just drop everything and I attend the centre. Every day I get ready as if I am required at the centres at 7.00am just in case this happens. It causes the least disruption to the centres and my lifestyle to do this. This is another reason why I prefer to hire some employees that live locally and roster them on the mornings shifts as I could call them last minute to try and have them assist on an early morning as they can get there by 7.00am.
100. The Awards impact my ability to roster the employees and run a service. I am only a small service, but I am also fortunate that my mum or myself can step in when staff are unavailable.

For example, if there was a bout of gastro that made a large group the employees unwell we would find it difficult to find enough staff to meet ratios.

#### Factors to consider when rostering

101. When planning a roster I generally start by looking at attendance patterns on a quarterly basis. For example, we know that less children are enrolled during December and January. Determining what a family's routine is, will determine how I roster the employees as I need to know how many children to expect in the morning and the evening to roster the opening and closing shifts appropriately having regard to ratios and consistency of care.
102. Other factors that can impact attendance at my centres are:
  - (a) cultural/religious events like Ramadan as we have many Muslim families whose children attend the centre; and
  - (b) school holidays (where parents generally bring their children in much later in the morning).
103. My Centres always close with 2 employees for security reasons. My staff are all female and I would not want any of them to close by themselves for work, health and safety reasons.

#### Rostering & the "7 Day Notice Period"

104. The Awards are not simple and easy to understand. They are also not sustainable unless they keep up with industry practice. There are many terms in the Award that are not relevant to the way childcare centres operate today. As a member of a peak industry body, which provides phone advice to members, I can tell you that consistently the single biggest issue that centers call about is wages and understanding the award.
105. I would say that the Award has not kept up with how things have changed in our industry. For example, the language in the Award classifications is not reflective of the roles that are performed at a childcare centre.
106. We need to build flexibility into the Awards to keep up with the times and to ensure they are consistent with all other legislative and funding requirements in the industry.

107. These changes to the awards will allow us to be more flexible and accommodating with staff as well as potentially open for longer hours to accommodate the needs of working families.
108. If we don't make the changes ACA is seeking, childcare is going to become more expensive for families. Trying to comply with the 7 days notice requirements will mean that we need to hire more casuals which would increase wage costs by at least 25% and therefore increase fees as well. If we were to accommodate parent requests for longer opening hours then we would incur penalty rates which would make fees incredibly high for families.
109. As explained above, the cost of fees will increase dramatically for families who require flexibility. What is likely to happen is an extension of what is already happening now – the costs to businesses will be crippling but big businesses will move money around to sustain their centres until the small business cannot afford to remain open. As soon as the small business shuts down, big business will introduce sky high fees. Families will have no choice because there are no options for them anymore.

#### **Affordability of childcare**

110. In our area, particularly in Lidcombe we have seen a huge growth in house prices. Families are finding it increasingly difficult to afford mortgage or rental payments. This has seen a change in the mobility of the area. More and more families are transient and move to cheaper areas as soon as they can. We have many families who purchase property or move to a rented home further west where it is more affordable. There has been a huge growth in the number of granny flats constructed and more and more families are squeezing in to a smaller space. With new migrant and refugee families, it is not uncommon for more than one family to live in a house together – sometimes with extended family like grandparents, uncles, etc as well. We have lots of families with multiple adults who live at the same address who come to drop off or pick up their children from our centres.

## **The Unions' Claims**

111. I have been informed of the nature of the changes to the Awards proposed by the Arrabaldes (**Individuals**), United Voice (**UV**) and the Independent Education Union (**IEU**) (**Unions**).
112. I respond to each of those claims below. Where possible I have included my reply to specific witness statements provided by the Unions in support of their respective claims.

### UV Claim - Responsible Person Allowance

113. I have understood that UV is seeking to insert an hourly allowance into both the Awards which would apply to the person who is the designated "Responsible Person" under the NQF. UV has suggested that this allowance is to compensate for the additional responsibilities of the "Responsible Person" which is not reflected in the Awards as the NQF was only introduced in 2012. UV states that the "Responsible Person" has extra responsibilities (when the Director or Nominated Supervisor is off-site) and therefore should receive an extra allowance for hours acting in that position.
114. From my experience and knowledge of the ECEC sector, I do not believe that it is necessary to have an additional allowance for a "Responsible Person" because there are no additional obligations of the "Responsible Person" for a short amount of time beyond what is already in their job description and classification in the Awards.
115. In my Centres, the "Responsible Person" will only not be the Director or Assistant Director for a short amount of time that day. During that short amount of time there will be a "Responsible Person" who will just be a point of call for the Centres for a short amount of time. This person has no practical additional work such as creating rosters, buying equipment or furniture or programming and planning for the Centres as the UV suggests. The "Responsible Person" is not responsible legally at any point for the other educators or staff members as this is still the ultimate responsibility of the Nominated Supervisor.
116. Before the NQF, there was always somebody who did this job when the Director or Nominated Supervisor was not on-site and there should not be an allowance because there has been no change in the work performed because an extra title was created in the NQF in 2012.

#### UV Claim - Educational Leader Allowance

117. It is my understanding that UV also seeks to insert a weekly allowance into the Awards which would apply to the person who is the designated “Educational Leader.”
118. Similarly to the “Responsible Person,” there has always been a form of “Educational Leader” This person has no additional responsibility as UV suggests and in fact, they have less work under the NQF as was the intention of the regulation.

#### *Role existed before NQF*

119. The ECEC sector to my knowledge has always had an educational leader, even before the NQF as services still needed to be accredited and a person was still in charge of guiding that educational program. Annexed and marked ‘KV-1’ is an example of a 2005 NCAC Quality Practice Guide which shows that the role of educational leader needed to be performed under Quality Area 3 Programming and Evaluation and Quality Area 4 Children’s Experiences and Learning in order to meet the qualities required of a centre. This clearly shows that there was a person fulfilling the role of “Educational Leader” well before the NQF and therefore this role was contemplated and given consideration in the making of the Modern Award created in 2009 by the Australian Industrial Relations Commission.

#### *No additional responsibility*

120. To be an “Educational Leader”, an educator does not require additional training, has no additional responsibilities or penalties under the National Laws or Regulations so there is no need for an allowance. Legally the nominated supervisor is still responsible for the programming of services.
121. The Educational Leader generally has a diploma or degree and is therefore paid at a higher classification level (levels 4-6) under the Awards and is therefore already adequately compensated for delivering/implementing an educational program and mentoring other staff. The Awards also require those who are responsible for preparing the educational program to have allocated time off the floor (away from children) and this includes Educational Leaders. Therefore, for any extra time that the Educational Leader role takes on, the person is already

being compensated for by having time off the floor to prepare.

*Less Work for Educational Leaders under NQF*

122. From my experience and knowledge with the ECEC sector, since the creation of the NQF and new staff:child ratios, educators actually have less work to do now then they used to. In NSW where there used to be 1:8 ratios, there is now 1:5 ratios and the Educational Leader therefore has more educators to help share the load. Additionally, the introduction of the NQF was supposed to reduce the regulatory burden whilst also improving quality standards. Annexed and marked **KV-2** is a Media Release dated 24 June 2014 which supports this.

UV Claim - Training Clause

123. UV is seeking training costs (including CPR and First Aid training) to be reimbursed for all levels of employees as well as having this time spent doing training be paid as time worked.
124. The Awards currently state that for staff that are Level 1 or 2, I must pay a First Aid allowance if they are appointed to administer First Aid. This allowance does not apply to levels 4-6 in the award as it is included in the hourly rate.
125. At my Centres, I pay my Certificate III's in accordance with the Children's Services Award (which is a Level 3 or above) and therefore I am required to pay for first aid qualifications only if the employee:
- (a) is required by an employer to act as a first aid officer; and
  - (b) they do not have current qualifications.
126. Having a current First Aid Certificate is one of the modules for obtaining a Certificate III and therefore it is an expectation that my staff will have a current First Aid Certificate if they wish to be classified and remunerated as a Certificate III. Annexed and marked '**KV-3**' the syllabus for the Certificate III which includes "HLTAID004" which is a First Aid Certificate as part of their qualification.
127. Although the Regulations state that you only need to have one First Aid trained employee on-site

at all times, First Aid Training is part of employees Certificate III qualifications and they are being paid for having certain attributes and certain qualifications when they first arrive for employment. It has always been an employee's responsibility to have a current first aid certificate (if they want to upskill) and has never been the employer's responsibility.

128. Training qualifications remain with employee (wherever they work) so it is common that employee's would pay for their own training. It is up to the employee themselves to upskill and train.
129. Regarding other types of training, some centres offer training for free if they can afford it but this is essentially an additional benefit of working for a particular employer who may offer you access to increased in-service training or pay for First Aid or CPR courses but is not a minimum requirement.
130. At my Centres we encourage staff to engage in training and workshops and generally pay for this. This is a cost to the Centre because if the training is during the day, not only do we have to pay the training fee and the staff's ordinary wage, we also have to pay for a replacement staff in order to ensure that we meet ratio requirements.
131. We sometimes offer to pay for weekend training and workshops for staff who are interested in attending these as we know that it can be difficult for staff to afford these and we want to encourage staff to have current, up to date knowledge in order to provide the best care and education for children. We do not pay our staff for this training as it a service that we provide for our employees and is not compulsory.

#### UV Claim - Non-contact time

132. I have also understood that UV seeks to increase the amount of non-contact time for employees who are 'responsible for the preparation, implementation and/or evaluation of a developmental program' from 2 hours up to 4 hours per week. Additionally, UV also seeks for the educational leader to receive non-contact time from 2-4 hours depending on how many children a centre has.
133. From my experience in the ECEC sector, technology is actually making non-contact time less

important than it was before as programming can be done much more efficiently and this extra non-contact time is unnecessary for the operational requirements of the ECEC sector.

134. I currently provide 2 hours of non-contact time to all permanent and part time employees. However, generally my staff do not take this as they say that they prefer to do their programming collaboratively with children as this is considered best practice. Employees do not take work home or work outside their rostered hours to complete programming or other tasks related to implementing or delivering an educational program. In fact our policy states that employees are not to take work home. Mandating this additional time is unnecessary.

#### UV Claim - Annual Leave

135. The UV has amended their initial claim for annual leave which now seeks that if centres have a shut-down over the Christmas period and employees are directed to go on annual leave that they are to be paid at their ordinary rate even if they have insufficient leave accrued.
136. Currently, the Centre remains closed for 2 weeks over the Christmas period because of the demand that we face. However, if the demand was different, it is possible that a Centre might need to close down for a month. Essentially, UV is asking all services to remain open all year which would mean charging parents even if there is no demand.
137. I have never been in a situation where I have directed an employee to take more leave than 2 weeks due to our shut down only being 2 weeks long. If I had to pay an employee to take annual leave when they had not accrued it, I would probably find some work for them to do over the shut-down instead. It would not be possible to afford to pay staff wages for 4 weeks when we are shut down and not receiving any income. The only option I could see to include this payment (when employees have no leave accrued) in my Centre would be to increase fees during the year in order to save funds for this. This would significantly impact families in my area.

#### IEU Claim - Coverage of degree qualified Directors

138. The IEU is seeking for Directors with teaching qualifications to be paid under the Teachers Award whether or not that person directly *delivers the educational program*.



139. I am a Director with a teaching degree at my Centres. However, I do not believe that the degree is a pre-requisite for the job.

140. I have been informed of Julie Frend's statement where she states:

**13.7:** *"my qualifications allow me to be aware of the regulations, their operation and how to employ best practices in relation to them".*

**13.9:** *"The teaching degree, in contrast to the Diploma, gives me a more holistic appreciation of processes and a better understanding of child development and behaviour. This ensures that the service will develop in ways best to achieve the expectations of the NQF".*

*"I believe that being a Director with teaching qualifications and experience has enabled me to more effectively lead the team to this result through more effective mentoring and support to educators and other teachers".*

*"I am able to mentor and support educators by implementing practices that are harmonious with ACEQUA assessment practices. This is because my teaching qualifications and experience have equipped me with critical reflection capabilities".*

141. I disagree with these statements above as having read through the course units of Early Childhood Degrees at various universities, I note that there is usually only 1 out of 16 units that relates to leading an organisation. Even within that unit, the perspective is of theoretical leadership rather than actual laws and regulatory requirements. In fact, I know a number of ECTs who have opted to also gain Diploma qualifications in addition to their degree to have a clearer understanding of the regulatory requirements and they told me that they found that the regulations were not adequately covered in their degree.

142. Ms Frend in her statements above has failed to establish the link between a person having the ability to create programs and plan for children and a person who can manage a group of employees. These are two separate jobs and I do not believe that a Director with teaching qualifications is necessarily any better at being a Director of employees than a person with a

degree in management.

143. Ms Frend also makes the statement that:

**13.12:** *“Parents of children within the preschool are more confident in my ability to run an educational organisation knowing that I have a thorough understanding of early childhood education through my teaching degree”.*

144. The statement above is untrue in my opinion. There are many educational organisations that I have met the Directors of that are run successfully by people with no educational qualifications. There is a different set of skills required to effectively run an organisation.

145. I have been informed of the statement of Lindy Farrant where she states:

**8:** *“I consider based on my experience as a Director that my teaching qualification and experience is essential to being an effective Director, in that it focuses my decisions in the context of the best interests of the child, instead of the organisation. This means I have more welfare and child - centred approach to early childhood education. I approach my practice with a pedagogical lens rather than what it is going to cost the Centre”.*

146. I do not see how a Director who does not consider the costing of a centre to be an effective and successful Director in the ECEC sector realistically. Any organisation can thrive only if it has long-term viability and this is extremely important in the ECEC sector. One of the major concerns for myself and other Directors who I have spoken to who have been in the sector for a long time is the emergence of new centres that are not well managed and therefore make losses and are shut down or bought out by new management. This is detrimental to the children, families and communities that they are supposed to support.

147. Ms Farrant also states that:

**11:** *“In order to lead a group of teachers in early childhood education, it is essential to have at least the same qualifications. You have to be credible in their eyes. A Director of an early childhood education Centre without a teaching degree would be like a nurse leading a group of doctors in their work”.*

148. I believe that this analogy is completely false when looking at the ECEC sector and is in fact false potentially even in the medical field. There are a different set of skills that are required to effectively manage an organisation. It is concerning that teachers with degrees would be remunerated higher or more trusted with managerial, financial and administrative tasks more than somebody who has a degree in management or a person who has run a successful centre for years. Even in the medical profession, I would want the doctors performing their duties as doctors and not a doctor being an administrator.

149. Ms Farrant also states that:

*15: "My tertiary teaching qualification and experience allows me to approach early childhood pedagogy differently than a certificate or diploma level qualification would. A tertiary qualified teacher brings a depth of knowledge and understanding to a playroom that is much deeper and allows them to promote the children's development. A certificate or diploma in early childhood education does not do this to the same extent".*

150. I agree somewhat that a degree might give them more insight into the playroom. However, I still do not understand how this is related to the IEU's claim for Directors as this statement does not prove that Directors need more insight into the playroom. I would argue that potentially somebody who has years of experience in the ECEC sector but does not have a teaching degree might have a better understanding of the playroom than someone who has just finished university.

151. Ms Farrant also states that:

*19: "I have observed that a tertiary level qualification and teaching experience allows someone to provide real insight into the needs of children. I have not observed the same level of observations from certificate or diploma holding educators regarding a child's development".*

152. In my experience, teachers who come straight from university actually have very little practical knowledge of how to work with children and I have personally seen teachers be overwhelmed and unsure. However, in my experience over many years Diplomas and Certificate III's are equally if not better at providing insight into the needs of children.

153. Ms Farrant also states that:

**20:** *"My qualifications and expertise help me identify when a child may be in need of a specialist referral since I have a much greater knowledge of whether a child needs further support staff".*

154. In my experience the above statement is not true. Anyone who works with children for a sufficient amount of time, even without any qualification would be able to identify when one child is developing slower than their peers. There are many parents who can identify this without any training at all. Inclusion and addressing children with additional needs is part of every course at all levels and not something that only teachers possess.

155. Ms Farrant also states that:

**24:** *"Having a teaching qualification allows you to have a greater depth of understanding of all those factors may impact children and their lives and their families. It is much easier to articulate those issues in my advocacy with a teaching degree"*

156. I do not believe that having a teaching qualification allows a greater depth of understanding and the most significant factor I have found is world experience and general knowledge of the individual as well as if the individual has had children of their own and their experiences as a parent. I agree somewhat, that it is generally easier for someone with a degree to potentially articulate issues in writing however I do not believe that this has a significant impact on their role as a Director.

157. Ms Farrant also states that:

**30:** *"Teacher qualified directors perform the role in a way that has more expertise than a diploma or certificate educator would".*

158. As mentioned earlier, the role of the Director is a different skillset than that of a teacher. I do not believe that having a degree is a factor on how well a Director performs their role. In fact, I would argue that having a diploma is probably a more useful/tailored qualification for a Director as there are modules that specifically cover managing a childcare centre including budgeting and

financial accountability as part of the diploma course.

159. I have been informed of the statement of Ana Mravunac. She states as follows:

**8:** *"My tertiary teaching qualifications and experience allow me to fulfil the following duties to a higher degree of competency:*

**8.1:** *ensure the centre is appropriately staffed with qualified and passionate educators;*

**8.2:** *ensure the delivery and compliance of standards to the NQF;*

**8.3:** *ensure that the team provides effective programs that encompass all aspects of a child's development and learning.*

**8.4:** *ensure the centre is accountable for compliance to state, national regulations and law and internal G8 policies and procedures*

**8.5:** *effectively transition children from room to room and centre based care to school.*

**8.6:** *ensure that appropriate supervision of children is occurring un the centre at all times*

**8.7:** *managing a safe and healthy centre environment, demonstrating safety leadership and culture be reinforcing safety values and behaviours*

**8.8:** *be responsible for safety, compliance and food safety management, ensuring team members are up to date with required training while implementing risk management policies.*

**8.9:** *build strong, supportive relationships with all families throughout their time with the centre.*

**8.10:** *Encourage family input into the quality improvement plan and net promoter score.*

**8.11:** *Maintain centre facilities and resources to an appropriate quality standard, escalating issues as necessary.*

**8.12:** *Ensuring the most current centre policies and procedures are implemented and maintained*

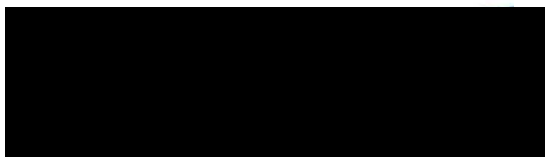
**8.13:** *be available to work contact time in the rooms as required."*

160. In my experience, the only part that could be performed arguably better by an ECT is 8.3. All other points are covered in Diploma or Certificate III qualifications. There are specific modules in these courses which deal with issues such as health and hygiene, safe food handling, etc and these are taught in the vocational sector with reference to WHS laws and Food Authority requirements and students are assessed on their ability to comply with these. In a degree, these are covered in a theoretical way and students are generally not assessed on their ability to

comply with specific laws.

IEU Claim - Casual minimum engagement

161. The IEU is seeking confirmation that casual teachers are paid for a minimum of a 'quarter day' when required to attend the workplace for a quarter day. I do not hire any casual teachers as I do not believe that they can look at the long term vision of the Centre if they are just filling in.
162. However, if I did hire a casual teacher, I would calculate a quarter day in accordance with the Teachers Award which is the weekly rate in accordance with clause 14.3 of the Award divided by 20 plus 25% taking into consideration that the weekly pay for an employee will be determined by dividing the annual rate by 52.18 and the fortnightly rate by 26.09. I believe I would need to add 4% on top of this as the additional allowance for ECTs who work in long day care settings.
163. I have not heard on any services that pay their casual employees only a quarter of a day when they work between a quarter and a half day and would pay as necessitated above by the Award.



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**11 April 2019**



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## **Quality Improvement and Accreditation System Quality Trends Report**

***QIAS Quality Practices Guide (1<sup>st</sup> edition, 2005)***

**For the period 1 July 2006 to 31 December 2006**

The purpose of this *Quality Trends Report* is to identify key areas within the Quality Improvement and Accreditation System (QIAS) that long day care centres are performing well in and those which contribute to centres receiving a Not Accredited status. The Quality Areas and Principles are detailed in the *QIAS Quality Practices Guide* (1<sup>st</sup> edition, 2005) available for purchase from the National Childcare Accreditation Council (NCAC). Where references are made to numbered indicators, these are listed in the *QIAS Validation Report* (3<sup>rd</sup> edition, 2005).

The *QIAS Quality Practices Guide* (1<sup>st</sup> edition, 2005) was implemented from January 2006. The first Accreditation Decisions under the reclassified standards were made in July 2006. This is the first *QIAS Quality Trends Report* against the reclassified standards.

The final Accreditation Decisions under the *QIAS Source Book* (2001) were made during July 2006. A final summary of the quality trends against the *QIAS Source Book* is now available in a separate report.

## QIAS Quality Trends Report

Long day care centres across Australia are generally performing well as measured by the QIAS. More than **95%** of centres that have completed the 5 steps of Child Care Quality Assurance to 31 December 2006 are Accredited. Of these services, **79%** have achieved High Quality in all Quality Areas. This is a significant achievement and indicates that long day care centres are performing at a high standard.

**845** long day care centres received Accreditation Decisions under the reclassified standards of the *QIAS Quality Practices Guide* (2005) between 1 July 2006 and 31 December 2006.

### The Principles for which centres most often achieve a High Quality standard are:

1.1	Staff interact with each child in a warm and friendly way	91%
1.3	Staff initiate and maintain respectful communication with each child	87%
1.4	Staff respect each child's background and abilities	88%
1.6	Staff communicate effectively to promote respect and professional teamwork	86%
2.3	The centre has orientation processes for children and families	88%
4.1	Staff encourage each child to make choices and participate in play	87%
4.2	Staff promote each child's ability to develop and maintain relationships	89%
7.3	Staff policies and practices facilitate continuity of care for each child	88%

### The Principles for which centres have most often not met the Satisfactory standards are:

1.5	Staff treat all children equitably	15%
5.3	Staff ensure that potentially dangerous products, plants and objects are inaccessible to children	24%
5.4	The centre ensures that buildings and equipment are safe	18%
6.2	Staff implement effective and current food safety and hygiene practices	17%
6.4	Staff ensure toileting and nappy changing procedures are positive experiences	16%
6.5	Staff support each child's needs for rest, sleep and comfort	25%
6.6	The centre acts to control the spread of infectious diseases and maintains records of immunisation	17%
7.1	Written information about the centre's management is readily available to families	15%



## Quality Area 1: Staff Relationships with Children and Peers

The development of the whole child is closely linked to the quality of the relationships experienced with others. Consistently respectful and sensitive communication and interactions between staff and children help to secure and promote children's social and emotional wellbeing, which in turn supports the development of other skills and abilities. (Extract from *QIAS Quality Practices Guide*, 2005, page 7).

### Quality Trends:

Most long day care centres achieved High Quality in this Quality Area. However, a significant proportion of centres did not meet the Accreditation standards of Principle 1.5.

### Quality Area 1 has six Principles:

#### Principle 1.1: Staff interact with each child in a warm and friendly way

Principle 1.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	91	5	0	4

In Principle 1.1 the indicator that most often resulted in Unsatisfactory ratings was:

**Indicator 1.1.15** *Staff sit and interact positively with children at mealtimes*

#### Principle 1.2: Staff guide each child's behaviour in a positive way

Principle 1.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	83	13	0	4

In Principle 1.2 the indicator that most often resulted in Unsatisfactory ratings was:

**Indicator 1.2.6** *Staff guidance for children is free from physical force, isolation, humiliation, anger, threats or shouting*

#### Principle 1.3: Staff initiate and maintain respectful communication with each child

Principle 1.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	87	10	0	3

Principle 1.3 was rarely rated Unsatisfactory.

**Principle 1.4: Staff respect each child's background and abilities**

Principle 1.4	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	88	9	0	3

Principle 1.4 was rarely rated Unsatisfactory.

**Principle 1.5: Staff treat all children equitably**

Principle 1.5	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	75	9	1	15

In Principle 1.5 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 1.5.1** *The centre has written policies and practices for inclusion and reducing bias in centre programs*

**Indicator 1.5.2** *These policies and procedures have been developed and discussed with families and the consultation dates are recorded*

**Principle 1.6: Staff communicate effectively to promote respect and professional teamwork**

Principle 1.6	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	86	11	1	2

Principle 1.6 was rarely rated Unsatisfactory.

## Quality Area 2: Partnerships with Families

Staff and families share the common goal of positive outcomes for children. Partnerships between staff and families are characterised by active communication and consultation that is fostered by staff and management. Each partnership is unique and will be dependent upon the specific needs, interests and communication styles of the participants.

The relationship between the child's family and staff is crucial to the child's wellbeing, development and progress. Children benefit most when this is a trusting and mutually supportive partnership. (Extract from QIAS Quality Practices Guide, 2005, page 21).

### Quality Trends:

Most long day care centres achieved High Quality in this Quality Area.

### Quality Area 2 has three Principles:

**Principle 2.1:** Staff and families communicate effectively to exchange information about each child and the centre

Principle 2.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	84	14	0	2

Principle 2.1 was rarely rated Unsatisfactory.

**Principle 2.2:** Staff encourage family participation and involvement in the centre

Principle 2.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	82	14	0	4

In Principle 2.2 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 2.2.1** *Staff gather information about skills, talents and interests that families would be happy to share within the program*

**Indicator 2.2.2** *The centre's family information package clearly indicates that family members are welcome to visit the centre at any time*

**Principle 2.3:** The centre has an orientation process for children and families

Principle 2.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	88	11	0	1

Principle 2.3 was rarely rated Unsatisfactory.

## Quality Area 3: Programming and Evaluation

The centre's philosophy provides an important framework within which programming decisions are made. Effective programming also takes into account feedback and observations from all the centre's stakeholders, most importantly, from the children themselves. The program comprises all aspects of children's experiences at the centre. It needs to be flexible and adaptable, at short notice, to meet individual and group interests, talents and abilities. The program should be stimulating and involving, with a variety of opportunities available for children to pursue their current interests and develop new ones. (Extract from QIAS *Quality Practices Guide*, 2005, page 29).

### Quality Trends:

Most long day care centres achieved High Quality in this Quality Area.

### Quality Area 3 has three Principles:

#### Principle 3.1: The program reflects a clear statement of centre philosophy

Principle 3.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	74	18	1	7

In Principle 3.1 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 3.1.2** *The centre's philosophy was developed or evaluated within the past year*

**Indicator 3.1.6** *The centre's philosophy values the role of families in the centre's program and policy decisions*

#### Principle 3.2: Each child's learning is documented and used in planning the program

Principle 3.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	77	14	1	8

In Principle 3.2 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 3.2.3** *Information from families and staff is recorded regularly in individual children's documentation*

**Indicator 3.2.4** *Individual children's documentation is analysed and used as a main source of information for planning and evaluating the program*

**Principle 3.3:** The program assists each child to be a successful learner

Principle 3.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	81	12	0	7

In Principle 3.3 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 3.3.1** *Written programming and evaluation is undertaken for all groups and each child*

**Indicator 3.3.8** *Written programming for all groups and for individuals is continuous, ongoing and influenced by program evaluation*

## Quality Area 4: Children's Experiences and Learning

Children are fascinated with the physical world and they want to explore it, make sense of it and have some control over it. Time to play, explore ideas, interact with others and make connections with the environment is an important element of early childhood programs. As children explore and experiment with language, relationships, ideas, equipment and materials they learn about themselves and the world. Such a program requires the active participation of staff and management in providing a rich environment whereby children have choices and a role in decision making (Extract from QIAS *Quality Practices Guide*, 2005, page 37).

### Quality Trends:

Most long day care centres achieved High Quality in this Quality Area.

### Quality Area 4 has six Principles:

#### Principle 4.1: Staff encourage each child to make choices and participate in play

Principle 4.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	87	9	0	4

In Principle 4.1 the indicator that most often resulted in Unsatisfactory ratings was:

**Indicator 4.1.9** *Staff observe and record children's interests and support them to further these interests*

#### Principle 4.2: Staff promote each child's ability to develop and maintain relationships

Principle 4.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	89	9	0	2

Principle 4.2 was rarely rated Unsatisfactory.

#### Principle 4.3: Staff promote each child's language and literacy abilities

Principle 4.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	84	14	0	2

Principle 4.3 was rarely rated Unsatisfactory.

**Principle 4.4:** Staff promote each child's problem solving and mathematical abilities

Principle 4.4	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	80	19	0	1

Principle 4.4 was rarely rated Unsatisfactory.

**Principle 4.5:** Staff promote each child's enjoyment of and participation in the expressive arts

Principle 4.5	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	83	12	1	4

In Principle 4.5 the indicator that most often resulted in Unsatisfactory ratings was:

**Indicator 4.5.6** *Staff minimise the use of stencils, colouring in and staff-directed experiences*

**Principle 4.6:** Staff promote each child's physical abilities

Principle 4.6	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	80	19	0	1

Principle 4.6 was rarely rated Unsatisfactory.

## Quality Area 5: Protective Care and Safety

Management and staff share a responsibility to keep up to date with the current research and practices recommended by recognised health and safety authorities. Also, centres are subject to workplace health and safety legislation that has implications for children, staff and anyone else who enters the premises. Clear policies and procedures relating to child protection and child safety are in the best interest of children, management, staff and families. Staff also require continuing professional development on child protection and child safety. It is important that staff know where to access current information from recognised authorities on child safety practices. (Extract from QIAS Quality Practices Guide, 2005, page 51).

### Quality Trends:

Most long day care centres achieved High Quality in this Quality Area. However, a significant proportion of centres did not meet the Accreditation standards of Principles 5.3, 5.4 and 5.5.

### Quality Area 5 has five Principles:

#### Principle 5.1: Staff act to protect each child

Principle 5.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	82	8	1	9

In Principle 5.1 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 5.1.1** *The centre has a written policy on child protection based on current legislation and advice from recognised authorities*
- Indicator 5.1.2** *Policies and procedures relating to child protection are dated and sourced*

#### Principle 5.2: Staff supervise children at all times

Principle 5.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	82	14	0	4

In Principle 5.2 the indicator that most often resulted in Unsatisfactory ratings was:

- Indicator 5.2.1** *Staff effectively supervise all areas accessible to children*



**Principle 5.3:** Staff ensure that potentially dangerous products, plants and objects are inaccessible to children

Principle 5.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	64	11	1	24

In Principle 5.3 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 5.3.1** *The centre has a written policy and procedures regarding the use and storage of dangerous products*
- Indicator 5.3.2** *The centre's policy and procedures regarding the use and storage of dangerous products are dated and sourced*
- Indicator 5.3.4** *Medications, detergents/cleaning products, garden chemicals and other dangerous products are clearly labelled with contents*
- Indicator 5.3.5** *Medications, detergents/cleaning products, garden chemicals and other dangerous products are inaccessible to children at all times*
- Indicator 5.3.6** *Containers for soiled nappies and other soiled items are securely covered and the contents are not accessible to children*
- Indicator 5.3.8** *The centre maintains current information from recognised health and safety authorities on dangerous products, plants and objects*
- Indicator 5.3.10** *Procedures for safe storage of potentially dangerous products are displayed for relief staff and visitors to the centre*
- Indicator 5.3.12** *The centre has a first aid/action plan on dangerous products*

**Principle 5.4:** The centre ensures that buildings and equipment are safe

Principle 5.4	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	71	10	1	18

In Principle 5.4 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 5.4.1** *The centre has written policies for safety checks and maintenance of buildings and equipment*
- Indicator 5.4.2** *The centre has systematic procedures for daily safety checks*
- Indicator 5.4.7** *All unused power points that are accessible to children have secure, protective caps*
- Indicator 5.4.8** *All electrical cords are out of reach of children or are secured*
- Indicator 5.4.12** *The centre regularly obtains updated information from recognised safety authorities about selecting, installing and maintaining equipment and furniture and maintaining buildings*

**Principle 5.5:** The centre promotes occupational health and safety

Principle 5.5	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	71	15	1	13

In Principle 5.5 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 5.5.1** *The centre has a written policy on occupational health and safety that is based on current legislation and advice from recognised authorities*

**Indicator 5.5.2** *Policies and procedures relating to occupational health and safety are dated and sourced*

**Indicator 5.5.6** *The centre has a procedure for regularly assessing occupational health and safety risks for staff, children and other visitors to the centre*

## Quality Area 6: Health, Nutrition and Wellbeing

Management and staff share a responsibility to keep up to date with current health research and with practices recommended by recognised health and nutrition authorities. Staff need to be sensitive and responsive to each child's daily nutritional needs and eating patterns, food preferences and cultural, religious or special dietary requirements. This should be complemented by a focus on the child's emotional wellbeing and on providing developmentally appropriate support for each child's growing confidence and independence.

Staff should engage in ongoing professional development and access current information from recognised authorities on children's daily nutritional requirements, on food handling and on hygiene practices. (Extract from *QIAS Practices Guide*, 2005, page 63).

### Quality Trends:

Most long day care centres achieved Good to High Quality in this Quality Area. However, a significant proportion of centres did not meet the Accreditation standards of each Principle.

### Quality Area 6 has six Principles:

#### Principle 6.1: Staff promote healthy eating habits

Principle 6.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	79	7	2	12

In Principle 6.1 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 6.1.2** *The centre's food and nutrition policy is dated and sourced*

**Indicator 6.1.9** *Children are encouraged to develop independence in accessing/pouring drinks*

**Principle 6.2:** Staff implement effective and current food safety and hygiene practices

Principle 6.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	66	16	1	17

In Principle 6.2 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 6.2.1** *The centre has written policies detailing food safety and hygiene practices based on recommendations by recognised health and safety authorities*
- Indicator 6.2.2** *The centre's policies on food safety and hygiene practices are dated and sourced*
- Indicator 6.2.4** *Food and drinks consumed by children are stored, handled, prepared and served in keeping with safety advice from recognised health and safety authorities*
- Indicator 6.2.12** *At least one staff member has completed a food safety training course recognised by a relevant health authority and advises other staff on appropriate food safety*

**Principle 6.3:** Staff encourage children to follow simple rules of hygiene

Principle 6.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	76	9	1	14

In Principle 6.3 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 6.3.1** *The centre has a policy on dental care based on current recommendations from recognised dental health authorities*
- Indicator 6.3.2** *The centre's dental care policy is dated and sourced*
- Indicator 6.3.3** *Staff implement the centre's dental care policy consistently*

**Principle 6.4:** Staff ensure toileting and nappy changing procedures are positive experiences

Principle 6.4	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	73	10	1	16

In Principle 6.4 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 6.4.4** *The centre has adopted practices for toileting and nappy changing that are consistent with current advice from recognised health authorities*
- Indicator 6.4.5** *Toileting and nappy changing procedures are displayed in toilet and nappy changing areas*
- Indicator 6.4.6** *The centre's procedures for toileting and nappy changing are implemented consistently*

**Principle 6.5:** Staff support each child's needs for rest, sleep and comfort

Principle 6.5	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	66	8	1	25

In Principle 6.5 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 6.5.1** *The centre has a written policy regarding safe, comfortable sleep/rest for children based on current advice from recognised authorities*
- Indicator 6.5.2** *The centre's policy regarding safe, comfortable sleep/rest for children is dated and sourced*
- Indicator 6.5.3** *Current information on sleep equipment and safe sleeping practices from recognised authorities is available to staff and families*
- Indicator 6.5.4** *Sleep procedures and sleep equipment take account of current safety advice from recognised authorities*
- Indicator 6.5.7** *The centre has a written clothing policy based on current advice from recognised health and safety authorities*
- Indicator 6.5.8** *The centre's clothing policy is dated and sourced*
- Indicator 6.5.11** *Within the scope of the centre's policy, staff respect each child's clothing preferences, including cultural differences*
- Indicator 6.5.18** *The centre's sun protection policy is dated and sourced*
- Indicator 6.5.19** *Staff are consistent in their efforts to protect children from exposure to the sun*
- Indicator 6.5.20** *Staff model the centre's sun protection policies*

**Principle 6.6:** The centre acts to control the spread of infectious diseases and maintains records of immunisations

Principle 6.6	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	69	14	0	17

In Principle 6.6 the indicators that most often resulted in Unsatisfactory ratings were:

- Indicator 6.6.1** *The centre has a written policy on child and staff immunisation and infectious diseases based on current recommendations from recognised health authorities*
- Indicator 6.6.2** *The centre's policy on immunisation and infectious diseases is dated and sourced*
- Indicator 6.6.3** *The centre's policy on child and staff immunisation is communicated to staff and families*
- Indicator 6.6.8** *The centre ensures that all families are advised of its exclusion policy relating to immunisation at the time of enrolment and are reminded of this policy at least twice per year*
- Indicator 6.6.10** *The centre follows a written procedure for advising the relevant authority of any occurrence of a notifiable disease at the centre*

## Quality Area 7: Managing to Support Quality

It is the role of centre management and staff to establish effective and ethical management policies and procedures. Centre policies and procedures must be informed by relevant legislative requirements, current 'best practice' in management and also reflect an awareness of community needs and issues. Comprehensive written policies and procedures provide clear guidance to staff and families in relation to management issues. Involvement of key stakeholders including families, staff, management and children, in policy review and development fosters an atmosphere of trust and teamwork.

An essential element of quality centre management is ensuring that clear and consistent procedures for the maintenance and confidential management of family, child and staff records are implemented. Decision making, grievance and complaints handling policies and procedures are transparent and clearly define accountability. (Extract from QIAS *Quality Practices Guide*, 2005, page 77).

### Quality Trends:

Most long day care centres achieved Good to High Quality in this Quality Area. However, a significant proportion of centres did not meet the Accreditation standards of Principle 7.1.

### Quality Area 7 has four Principles:

**Principle 7.1:** Written information about the centre's management is available to families

Principle 7.1	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	72	13	0	15

In Principle 7.1 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 7.1.5** *Information such as agendas for family meetings are distributed in advance*

**Indicator 7.1.7** *Where the centre has a current Quality Profile Certificate from the National Childcare Accreditation Council, it is clearly displayed for families, staff and visitors to see*

**Principle 7.2:** Written information about the centre's management is available to staff

Principle 7.2	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	79	13	1	7

In Principle 7.2 the indicator that most often resulted in Unsatisfactory ratings was:

**Indicator 7.2.2** *There is a brief induction process specifically for new relief staff*

**Principle 7.3:** Staffing policies and practices facilitate continuity of care for each child

Principle 7.3	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	88	12	0	<1

Principle 7.3 was rarely rated Unsatisfactory.

**Principle 7.4:** Management provides professional development opportunities for all staff

Principle 7.4	High Quality	Good Quality	Satisfactory	Unsatisfactory
%	77	16	1	6

In Principle 7.4 the indicators that most often resulted in Unsatisfactory ratings were:

**Indicator 7.4.2** *Staff meet regularly and the meeting agendas and outcomes are documented*

**Indicator 7.4.5** *Management works with staff to identify and plan professional development strategies that meet both centre and staff priorities*

## Comparative Quality Trends Analysis

This report is the first QIAS *Quality Trends Report* for long day care centres under the revised standards of the *QIAS Quality Practices Guide* (2005).

The standards in the *QIAS Source Book* (2001) were reclassified to develop the *QIAS Quality Practices Guide* (2005) with several amendments including: a reduction from 10 Quality Areas to 7 Quality Areas; the inclusion of standards of Good Quality care; and the removal of Unsatisfactory indicators from the document. Indicators of quality practise were reworded to improve clarity and the location of Principles in each Quality Area was also reviewed.

**845** services progressed through the 5 steps of Quality Assurance and received an Accreditation Decision under the reclassified standards to 31 December 2006.

Notable trends in the data include:

- Continuing high achievement by long day care centres across all Quality Areas, which is consistent with previous *Quality Trends Reports* conducted against the standards of the *QIAS Source Book* (2001).
- The lowest proportion of High Quality ratings for any Principle was 66%, which indicates the high level of achievement by the majority of long day care centres across Australia.
- Across several Quality Areas, a significant proportion of centres received Unsatisfactory ratings in relation to the development, implementation, dating and sourcing of written policies and procedures in the following areas:

Principle	Policy and Procedure
1.5	Inclusion and reducing bias
5.1	Child protection
5.3	Use and storage of dangerous products
5.4	Maintenance of safe buildings and equipment
5.5	Occupational health and safety
6.1	Food and nutrition
6.2	Food safety and hygiene practices
6.3	Dental care
6.4	Toileting and nappy changing
6.5	Rest and sleep, clothing and sun protection
6.6	Immunisation and infectious diseases

- Failure to date and source written policies and procedures contributed significantly to a relatively high proportion of centres receiving Unsatisfactory ratings across Quality Areas 5: Protective Care and Safety, and 6: Health, Nutrition and Wellbeing.



## NCAC Support for Services

The purpose of this *Quality Trends Report* is to identify key areas within the QIAS that long day care centres are performing well in and those which contribute to schemes receiving a Not Accredited status.

NCAC aims to work in partnership with long day care centres to facilitate and support continuous improvement to the quality of child care provided for children in Australia. The *Quality Trends Report* assists NCAC to provide targeted support to schemes as they progress through the QIAS.

NCAC has implemented several initiatives, addressing concerns raised in the *Quality Trends Reports* as follows:

- The *NCAC Policy Development Guide* was introduced in October 2006, to assist services to research, develop and review policies in collaboration with stakeholders. The *NCAC Policy Development Guide* is available on the NCAC website ([www.ncac.gov.au](http://www.ncac.gov.au)).
- NCAC's quarterly newsletter, *Putting Children First*, was distributed to all services participating in the Child Care Quality Assurance systems in June, September and December 2006. Articles supporting quality practices included:
  - *Meeting Quality Assurance Requirements with Minimal Resources*
  - *Planning Experiences for Children*
  - *Environmental Experiences in Child Care*
  - *Electrical Safety in Children's Services*
  - *Ask a Child Care Adviser – Dental Health*
- NCAC *Factsheets* are distributed to all long day care centres that register to participate in the QIAS, providing information for long day care staff on a variety of issues identified to be problematic in the *Quality Trends Reports*:

<b>Factsheets</b>	<b>Relevant Principles</b>
<i>Developing a Service Philosophy</i>	1.2, 1.5, 2.1, 2.3, 3.1, 3.2, 3.3, 4.1, 4.2, 4.4, 4.5, 4.6, 7.1, 7.2
<i>Safety in Children's Services</i>	5.2, 5.3, 5.4, 5.5
<i>Food Safety</i>	6.2
<i>Developing a Policy</i>	1.2, 1.5, 1.6, 2.1, 2.2, 3.1, 5.1, 5.3, 5.4, 5.5, 6.1, 6.2, 6.3, 6.5, 6.6, 7.1, 7.2
<i>Managing Complaints</i>	2.1, 2.2, 2.3, 7.1

NCAC will continue to use the information provided in the *Quality Trends Reports* to develop ways to effectively support long day care centres participating in the QIAS.

## Quality Improvement and Accreditation System

### Principle Ratings

For Accreditation Decisions received 1 July 2006 - 31 December 2006

Quality Area 1		High Quality (%)	Good Quality (%)	Satisfactory (%)	Unsatisfactory (%)
Principle 1.1	Dec-06	91	5	0	4
Principle 1.2	Dec-06	83	13	0	4
Principle 1.3	Dec-06	87	10	0	3
Principle 1.4	Dec-06	88	9	0	3
Principle 1.5	Dec-06	75	9	1	15
Principle 1.6	Dec-06	86	11	1	2
<b>Quality Area 2</b>					
Principle 2.1	Dec-06	84	14	0	2
Principle 2.2	Dec-06	82	14	0	4
Principle 2.3	Dec-06	88	11	0	1
<b>Quality Area 3</b>					
Principle 3.1	Dec-06	74	18	1	7
Principle 3.2	Dec-06	77	14	1	8
Principle 3.3	Dec-06	81	12	0	7
<b>Quality Area 4</b>					
Principle 4.1	Dec-06	87	9	0	4
Principle 4.2	Dec-06	89	9	0	2
Principle 4.3	Dec-06	84	14	0	2
Principle 4.4	Dec-06	80	19	0	1
Principle 4.5	Dec-06	83	12	1	4
Principle 4.6	Dec-06	80	19	0	1
<b>Quality Area 5</b>					
Principle 5.1	Dec-06	82	8	1	9
Principle 5.2	Dec-06	82	14	0	4
Principle 5.3	Dec-06	64	11	1	24
Principle 5.4	Dec-06	71	10	1	18
Principle 5.5	Dec-06	71	15	1	13

Quality Area 6		High Quality (%)	Good Quality (%)	Satisfactory (%)	Unsatisfactory (%)
Principle 6.1	Dec-06	79	7	2	12
Principle 6.2	Dec-06	66	16	1	17
Principle 6.3	Dec-06	76	9	1	14
Principle 6.4	Dec-06	73	10	1	16
Principle 6.5	Dec-06	66	8	1	25
Principle 6.6	Dec-06	69	14	0	17
<b>Quality Area 7</b>					
Principle 7.1	Dec-06	72	13	0	15
Principle 7.2	Dec-06	79	13	1	7
Principle 7.3	Dec-06	88	12	0	0
Principle 7.5	Dec-06	77	16	1	6
Reporting period of 6 months to end of month specified. Figures rounded to the nearest whole percentage.					
Number of long day care centres which received an Accreditation Decision in this 6 month period: 1 July 2006 – 31 December 2006: 845					

# "KV-2"



**Ministers for the**  
**Department of Education and**  
**Training**  
**Media Centre**

## **Review of child care National Quality Framework performance underway**

Tuesday 24 June 2014 Media Release

**The Hon Sussan Ley MP**

[[link:https://ministers.education.gov.au/archive-ley](https://ministers.education.gov.au/archive-ley)]

- Assistant Minister for Education

The first major review of the child care National Quality Framework (NQF) is underway to measure whether it is delivering on its objective to reduce regulatory burden whilst also improving quality standards.

Assistant Minister for Education Sussan Ley said the review could not have come at a better time, with the national regulator reporting the average ongoing cost of administering the NQF

was \$140,000 per year for a Long Day Care service with 75 places and 15 staff.

Ms Ley said this was the result of unnecessary red tape created by the previous Federal Labor Government's poor implementation of the NQF.

She said the review included extensive public consultation and encouraged services, educators and parents to have their say before online submissions closed July 4 (visit <http://www.woolcott.com.au/NQFReview/> [[link:http://www.woolcott.com.au/NQFReview/](http://www.woolcott.com.au/NQFReview/)]).

“The Abbott Government is committed to the National Quality Framework and its values, but we're also committed to dealing with the mountains of unnecessary red tape caused by Labor's botched implementation,” Ms Ley said.

“I hear from educators and services all the time who just want to get on with the important job of educating and caring for our children instead of being locked in an office filling out unnecessary paperwork

“The National Regulator also found 97 per cent of services consider the National Quality Framework to be a burden, with almost 80 per cent rating it significant.

“Labor promised the National Quality Framework would only increase fees by 57 cents per week, but the evidence suggests this is closer to \$5-\$20 per day.

“These additional costs from Labor’s red tape are ultimately passed on to parents in the form of higher fees. I have no doubt this is a major factor in child care fees skyrocketing an average of 53 per cent during Labor’s six years in government.

“However, it’s also important we hear about what is working to ensure we build on the good work undertaken by services and educators so far and reduce red tape without reducing the quality of child care and early learning.

“I therefore encourage everyone to get involved and share their ideas on how we can reduce red tape and improve quality further.”

Ms Ley said the review was a requirement of the National Partnership signed between the previous Federal Labor Government and the states and territories and was being undertaken in consultation with all parties.

She said the NQF review would examine whether the NQF had improved efficiency and cost of regulation of services and reduced regulatory burden.

It will also look at whether the new processes introduced via the NQF are delivering the quality objectives of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care, she said.

The NQF review will hand its final report to governments later this year and will be considered alongside the current Productivity Commission Inquiry into making child care more

affordable, flexible and accessible.

The Abbott Government has also already begun working with the states territories to implement a number of measures to cut unnecessary NQF red tape impacting assessment and ratings, supervisor certificates, ratios and regional and rural areas.

Visit [www.education.gov.au](http://www.education.gov.au) [[link:http://www.education.gov.au/](http://www.education.gov.au/)] or <http://www.woolcott.com.au/NQFReview/> [[link:http://www.woolcott.com.au/NQFReview/](http://www.woolcott.com.au/NQFReview/)] for the full terms of reference and how to participate in consultation.

### **OTHER KEY EXAMPLES OF NQF RED TAPE:**

- a 43 per cent increase in the number of services needing staff waivers because they could not meet NQF qualification requirements;
- one-in-five services risk not being able to hire an early childhood teacher to meet the NQF's mandatory requirement due to a major skills shortage;
- Only about a third of child care services have been assessed for a quality rating after two years, with just 12 months left to have all services rated at least once.

A report by national regulator the Australian Children's Early Childhood Quality Authority (ACECQA) also found services considered the following NQF activities as the most burdensome:

- Quality Improvement Plans (QIPs) (31 per cent)
- Documenting children's learning (34 per cent)
- Notifications (32 per cent)

- Maintaining policies and procedures (32 per cent)
- Keeping records (31 per cent)

The ACECQA report also found the ongoing cost of revising QIPs was \$4835 per year, while report cards to “document children’s learning” cost \$690 — and 22 hours of paperwork — for each child annually.

The ACECQA Report on the National Quality Framework and Regulatory Burden: [http://www.acecqa.gov.au/report-on-cutting-nqf-red-tape-published\\_1](http://www.acecqa.gov.au/report-on-cutting-nqf-red-tape-published_1) [[link:http://www.acecqa.gov.au/report-on-cutting-nqf-red-tape-published\\_1](http://www.acecqa.gov.au/report-on-cutting-nqf-red-tape-published_1)].

## For more information

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**Non-media queries:** [1300 566 046](tel:1300566046) [[link:tel:1300566046](tel:1300566046)]



# CERTIFICATE III IN EARLY CHILDHOOD EDUCATION AND CARE

National Course Code: CHC30113  
TAFE NSW code: CHC30113-01V02-19OTE-002

## Location – TAFE Digital

 [Save Course](#)

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Enrol Now (<https://enrolmentportal.ebs.tafensw.edu.au/Enrol/Process/GetStarted/127/984736>)

Enquire Now

**Study Type**

Online

**Course Start Date**




Anytime

**Hours Per Week**

Enquire

**Duration**

18 Months

-  Nationally Recognised Training
-  Traineeship Allowed
-  This training is subsidised by the NSW Government

## Course Details

Course Description



This qualification reflects the role of workers in a range of early childhood education settings who work within the requirements of the Education and Care Services National Regulations and the National Quality Standard. They support the implementation of an approved learning framework, and support children's wellbeing, learning and development. Depending on the setting, educators may work under direct supervision or autonomously.

Under the Education and Care Services National Law (2011) the Australian Children's Education and Care Quality Authority (ACECQA) publishes lists of approved early childhood education and care qualifications and information regarding regulatory requirements here: [www.acecqa.gov.au](http://www.acecqa.gov.au)

#### ENROLLING IN FIRST AID UNITS OF COMPETENCY

If you are seeking to enrol in a First Aid unit of competency you are advised that to complete the unit you must be able to perform basic life support skills, for example control bleeding and perform cardiopulmonary resuscitation (CPR). If you have a disability that would prevent you from performing required basic life support skills you are advised that you will not be able to achieve the unit of competency.

#### Fee Details



#### Units



Number	Title
CHCECE005	Provide care for babies and toddlers
CHCECE007	Develop positive and respectful relationships with children
CHCDIV002	Promote Aboriginal and/or Torres Strait Islander cultural safety
HLTAID004	Provide an emergency first aid response in an education and care setting
CHCECE009	Use an approved learning framework to guide practice
CHCLEG001	Work legally and ethically
CHCECE001	Develop cultural competence
CHCPRT001	Identify and respond to children and young people at risk
CHCECE011	Provide experiences to support children's play and learning
CHCECE026	Work in partnership with families to provide appropriate education and care for children
BSBWOR301	Organise personal work priorities and development
CHCECE003	Provide care for children

CHCECE012	Support children to connect with their world
HLTWHS001	Participate in workplace health and safety
CHCECE004	Promote and provide healthy food and drinks
CHCECE010	Support the holistic development of children in early childhood
CHCECE002	Ensure the health and safety of children
CHCECE013	Use information about children to inform practice
<b>Entry Requirements</b>	
<b>Other Requirements</b>	
<b>Information Sessions and more about the course</b>	
<b>Attendance</b>	
<b>How to Enrol</b>	
<b>Career Opportunities</b>	

## Fees

### Subsidised Prices

First Qualification	\$1,600.00
Second Qualification	\$1,930.00
Traineeship	\$1,000.00
Concession	\$240.00

### Non-subsidised Prices

Full Fee	\$7,260.00
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What do these price(s) mean?

Calculate Your Fee ([https://tea.tafensw.edu.au/calculator/CHC30113-01V02\\_19OTE-002/127/FEC](https://tea.tafensw.edu.au/calculator/CHC30113-01V02_19OTE-002/127/FEC))

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## Course Location

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## Course Information

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Last name\*

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