

## Submission:

### *Response to Minister Mal Brough's Announcement of QIAS Overhaul*

The Social Justice In Early Childhood (SJIEC) group is a non-profit community based organisation. It comprises early childhood practitioners, early childhood academics and specialists, and community members committed to supporting social justice in early childhood education, throughout Australia and internationally. In this submission, we outline our response to the recent announcement by Minister Mal Brough to overhaul the national Quality Improvement and Accreditation System (QIAS).

We support the notion that high quality education and care should be occurring not only on the day/s of Validation, but every day. However, we propose that the announced changes to Accreditation, as outlined by the Minister, do not sufficiently address the issues pertaining to quality in how it is described, practiced and measured in children's services.

We outline why we believe this to be the case through discussion on four aspects of the announced overhaul:

1. *"Consultation process before changes are implemented with child care staff, child care services, community organisations and families"* (Mal Brough media release 18/5/06).
2. *"Random Spot Visits"* (Mal Brough media release 18/5/06); *"Unannounced Validation Visits"* and *"Unannounced Spot Visits"* (National Childcare Accreditation Council information release 18/5/06).
3. *Non-peer Validators* (National Childcare Accreditation Council information release 18/5/06).
4. The folding-in of three quality assurance systems into one system (Quality Improvement and Accreditation System (QIAS) for long day care centres; Family Day Care Quality Assurance (FDCQA) for family day care schemes; and Outside School Hours Care Quality Assurance (OSHCQA) for outside school hours care services).

In discussing each of these four proposed changes, we outline recommendations that we believe will more effectively address our shared concerns of strengthening and improving quality assurance.

## 1. Consultation Process

Working in partnership with early childhood practitioners and key stakeholders is a core value that underpins National Childcare Accreditation Council's (NCAC) mission statement. We are therefore concerned that the changes announced by the Minister do not appear to have stemmed from widespread consultation with the early childhood field.

We are aware that a National Review of Child Care Standards was conducted in 2005, and that a series of options based on consultation and research have been proposed. We call upon the Minister to be accountable to his constituents and to disclose both the basis of his announcements and the findings and options outlined in the National Review's final report.

Moreover, the SJIEC group is concerned that the consultation process which was promised by the Minister "*before any changes were made*" has to date not been fulfilled. We urge the Minister to uphold his promise, and take into consideration the importance of a valid, rigorous and fair consultative process. We believe it is imperative that the consultation alluded to by the Minister include early childhood academics and specialists, peak early childhood groups, early childhood researchers and most importantly, early childhood practitioners who work directly with children.

We raise further concerns that the Accreditation system has not been externally validated to assess its worth and effectiveness. So, as part of the consultation process we recommend a meeting with peak bodies to discuss how and when an external evaluation of the system will take place, both in the process of 'overhaul' and implementation.

## 2. Random Spot Visits, Unannounced Validation Visits and Unannounced Spot Visits

The SJIEC group sees such a 'spot check' approach to quality assurance in early childhood as limited in its capacity to strengthen parents' confidence in the standards of care being provided. We understand the Minister's concerns about some centres manipulating current accreditation systems so as to be seen to be providing 'quality' on their assessment days. However, the proposed random visits will do little to make accreditation a more robust system. This is because we anticipate that the focus of these visits will be on tangible breaches (eg., inadequate signage, lack of thorough hygiene practices) which are already targeted in spot checks conducted by the NSW Department of Community Services. It is simply not feasible to assess quality interactions and experiences in an ad hoc, unannounced manner. Moreover, we are concerned about the stress unannounced visits may place on teachers and staff and the effect of the

professional mistrust these practices could have on teachers' commitment to the early childhood field. Maintaining a culture of mistrust can have detrimental effects on the quality of provision that teachers and staff are able to provide if they are seen by regulatory bodies as untrustworthy.

We call for the relationship between early childhood services and NCAC to shift from this positioning. Consistent with the mission of NCAC, there is potential for NCAC and Validators to build more collaborative and professional relationships with services, which will engender a collaborative culture committed to quality assurance and improvement, rather than a 'performance'. We discuss the specifics of this shift in the next section.

### 3. Non-Peer Validators

We believe that for non-peer validators to effectively support early childhood services to work towards high quality, they will need to:

- have an early childhood university qualification of a bachelors at minimum (B.Teaching or B.Education);
- have had recent experience working directly with children (i.e. have had at least ten years' full time (or equivalent) experience working with children. This experience is to be post graduation and is to include a minimum five years' experience as a director); and
- be employed by NCAC on a secondment basis of 3-4 years, then return to the field.

We suggest that the term *Validator* be changed to *Consultant*. In using different terminology, early childhood teachers interested in becoming professional mentors to others in the field may be more attracted to the role. In this way, the idea of ongoing improvement can be the language with which child care professionals talk about quality rather than passing a validation.

In addition, we believe that Unannounced Spot Visits need to be collegial, collaborative and supportive visits, where the *Consultant* assists centres to work towards improvement over time. *Spot Visits* could be termed *Consultative Visits*. This could be achieved if:

- *Consultants* were allocated a cluster of centres in a geographical area;
- The clusters worked with their *Consultant* as well as each other to improve and strengthen the quality of their service (eg. Centre Directors could arrange visits of each others' centres along with the *Consultant*);
- Quality improvement is seen for most centres to be an upward spiral of improvement, rather than an end product or result.

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- Centres of excellence, that is, centres demonstrating high quality standards, be promoted and publicly acknowledged through this process. This initiative would provide a more substantial incentive for services to provide high quality care on a consistent basis, and serve to dilute the potential of random visits being conducted and experienced as a policing exercise.

*Consultative Visits* can be designed to benefit children's services by first and foremost, considering four key points we already know constitute quality:

1. staff qualifications,
2. child/staff ratios,
3. group size, and
4. continuity of staff/child relationships.

If these fundamentals frame a measurement of quality then *Consultative Visits* can be about ongoing improvement rather than 'policing'. A service which ensures that the above four aspects are meeting at least, minimum standards, has cause to move to the next phase of the improvement process. However, if these four aspects are not being practiced, a centre should immediately be questioned in terms of how it is possible to achieve quality without these factors in place.

The initiatives we are advocating here have obvious implications for how Accreditation is currently administered. We are clearly envisaging a transformed system that we believe will more effectively address the Minister's, and our, shared concerns. Along with the Consultants' ongoing *Consultative Visits*, Accreditation could become an ongoing process (as was intended), where improvement is monitored and documented over time, rather than relying on a one or two-day assessment. We believe the Accreditation process can become more robust and reliable to enhance the validity of accreditation decisions, all of which are goals of the NCAC.

## 4. Folding in of three systems

The SJIEC group is concerned that the folding in of these three quality systems will not address quality assurance. In the first instance, each of these three quality systems offers distinct programs for children:

- Educational and Care Program: Quality Improvement and Accreditation System (QIAS) for long day care centres;
- Care Program: Family Day Care Quality Assurance (FDCQA) for family day care schemes; and
- Leisure Program: Outside School Hours Care Quality Assurance (OSHCQA) for outside school hours care services.

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It is not appropriate for one system of quality assurance to be applied to these three different service types. There needs to be a separate document for each of the three provisions to address quality assurance.

The requirements for each of these provisions are essentially and educationally different. For example, the number of trained staff in Long Day Care required by state regulations differs from the staff in Family Day Care and Out Of School Hours Care (as well as from state to state). In the same vein, the programmes required for each provision also differ significantly. Unless the system demonstrates how the uniqueness of each provision will be maintained, we urge you not to proceed with this change as part of the QIAS 'overhaul'.

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## CONCLUSION

In this submission, the SJIEC group has responded to the four key changes announced by the Minister. We urge the Minister to seriously consider this submission and we look forward to a response that addresses our concerns and recommendations. We also welcome any opportunity to further discuss these issues with representatives from FACSIA and NCAC.

The contactable SJIEC group representatives for this submission are:

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Yours Sincerely,

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*We would like to acknowledge the contribution of the following people in the production of this document:  
Marianne Fenech, Wendy Shepherd, Miriam Giugni, Sandra Cheeseman and Kathryn Bown.*