Review of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care

QCEC Submission, 2014

Introduction
The Queensland Catholic Education Commission (QCEC) is an approved Central Governing Body (CGB) in Queensland with authority to distribute funding to its kindergarten member services. QCEC as a CGB is the signatory to a Contract Agreement with the Queensland Department of Education, Training and Employment (DETE) for the distribution of funding under the Queensland Kindergarten Funding Scheme (QKFS). In 2014, QCEC CGB has 23 standalone kindergartens located on Catholic school sites. The management of these kindergarten services is the responsibility of four Approved Providers operating in Catholic dioceses of Brisbane, Cairns, Rockhampton and Townsville.

In this written submission QCEC, as a relative newcomer to the provision of early childhood education and care services, has provided general comments as it is not in a position to provide detailed comment about ‘on the ground’ matters related to implementation of the National Quality Framework. Representatives from the four delegated Catholic agencies operating kindergartens have indicated they will attend face-to-face consultation forums and/or make a written submission to provide their feedback.

General comments
QCEC fully supports the introduction and implementation of the NP NQA initiatives and processes over recent years - national legislation (National Law and National Regulations), National Quality Standard, national ratings and assessment process and the establishment of the Australian Children’s Education and Care Quality Authority (ACECQA). The following comments and concerns are aligned with the terms of reference for the 2014 Review - questions for discussion and feedback.

1. **The degree to which the agreed objectives and outcomes and/or outputs of the NP NQA have been achieved:**
   a. **whether the National Quality Framework has improved the efficiency and cost effectiveness of the regulation of services and reduced the regulatory burden of service providers, including a review of costs of regulation through modelling and review of fee structures.**

QCEC is not able to provide a comment as it is not an Approved Provider and does not operate services.
b. whether the system provides an integrated and unified national system with consistency of approach and interpretation of the National Law.

There has been a strong commitment to a nationally consistent approach which has resulted in the provision of improved access to and quality of ECEC services across the nation. The objectives of the National Partnership for National Quality Agenda have been met to varying degrees and levels of consistency. In the implementation of a national approach in any policy area there is inevitably going to be some barriers to agreement across states and service providers.

QCEC has been a member of a Queensland state key stakeholder group called Legislative and National Implementation Reform Committee (LNIRIC) which represents all types of ECEC services providers and peak bodies. Through this group QCEC has contributed to state and national consultation processes, at times raising issues and voicing concerns; been provided with information about proposed changes; and provided feedback on communication strategies for changes affecting services. Through this group it has been evident that the National Quality Framework and national legislation affects different service types in different ways, particularly in relation to the legislative requirements for Outside School Hours Care.

Concerns:

- Changed qualification requirements for the employment of early childhood teachers is seen as a positive move in lifting the profile of early childhood education, however, it is a real challenge in many locations to fulfil this requirement. In rural and remote areas it can be particularly difficult to recruit and retain suitably qualified staff to teach. Finding a suitably qualified early childhood teacher to undertake emergency relief teaching can be almost impossible in some areas of Queensland.

- Better alignment between the National Law and Regulation and the requirements of the Queensland Kindergarten Funding Scheme would be welcome as there are a some areas where the difference has a real impact on the viability of kindergarten services (e.g. the length of time a person with a qualification in primary teaching can be employed as a relief teacher for short-term illness or leave – 12 weeks under National Regulations compared to 10 days under QKFS).

C. The extent to which the National Quality Standard and the assessment and ratings process has contributed to continuous improvement for services and, over time, positive outcomes for children.

The National Quality Standard addresses all the important areas of providing a quality early childhood education and care environment for young Australian children. Each of the Quality Areas covers the main aspects to be addressed through the sub-topics outlined in the standards and elements. It is important that there does not become one fixed picture of how the standards and elements are evident in services but rather each kindergarten, like each school, has its own context, community, philosophy, climate and ethos. While there will be many similarities between services there will also be unique differences which should be acknowledged and celebrated.

Concerns:

- The assessment and rating process aims to meet the objective of promoting continuous quality improvement of education and care services. Through the Quality Improvement Plan and the positive approach taken by Authorised Officers and services to the process it achieves this objective to some extent. However, in some cases currently the stress and anxiety experienced prior to the visit and waiting for the ‘rating result’ may outweigh the positive aspects of the assessment and rating process. It is hoped that high stress levels will decrease over time as relevant parties become more familiar with the process.
The level of consistency and comparability in the assessment and rating process across services is an ongoing concern. It would appear that some Authorised Officers in DETE Regional Offices are working out of a previous model of accreditation by seeing the visit as a time to complete a ‘checklist’ of measures rather than looking at the best ‘outcomes’ for children. This has resulted in some inconsistencies in the ratings provided to services, particularly with regard to Quality Area 1.

The Queensland Studies Authority (QSA) developed the Queensland Kindergarten Learning Guideline (QKLG) and Continua of learning and development to align with the Early Years Learning Framework (EYLF). The QKLG provides educators with advice and guidelines about program planning, teaching and learning, assessment and transition statements and resources for the kindergarten aged cohort. Some Authorised Officers have confused Approved Providers and kindergartens with their understanding of the alignment of these two documents. For QKFS funding purposes it is a requirement that kindergartens deliver their educational program based on the Queensland Kindergarten Learning Guideline on another QSA accredited program.

d. The effectiveness of the governance arrangements for the National Quality Framework, including the role and structure of the Australian Children’s Education and Care Quality Authority (CESCQA) and the effectiveness of this body in contributing to effective and efficient implementation at the National Quality Framework.

QCEC has found information provided by ACECQA to be clear and well-communicated. QCEC distributes communication from ACECQA to the four delegated Catholic agencies. Navigation of the ACECQA website is effective and their response to queries is professional, prompt and detailed. ACECQA staff presentations at various meetings and national conference are professional and show a willingness to work collaboratively with the ECEC sector.

2. The efficiency and effectiveness of regulatory models, including approaches adopted by regulatory agencies and an examination of cost and key cost drivers for services and regulators.

As QCEC is not an Approved Provider dealing with the Regulatory Authority (DETE) regarding service approvals, supervisor certificates, waivers, review of decisions, and compliance and enforcement actions, etc. it is therefore not in a position to provide feedback.

3. Whether the range of services covered by the National Quality Framework should be expanded to include services currently excluded by the regulations

Although it may seem ideal that all services providing education and/or care for young children come under the national law and regulations it must be acknowledged that it will more than likely be very difficult for some services, e.g. adjunct sports and leisure care to comply with all the regulations.

4. Whether legislative requirements can/should be tailored to particular service types/settings (Outside school Hours Care)

The national legislation requirements relates to all service types which should be viewed as an advantage in striving for national consistency in quality ECEC service provision. However, all service types have their own context in which they operate. As Catholic kindergartens operate on Catholic school sites, there are occasions where the disconnect between the National Education and Services Law and Regulations and relevant national and state Education Acts for the schooling sector is a matter of real concern. These differences become more evident when children are placed in a combined
kindergarten/Prep group within the school setting with regard to enrolment, policy development, provision of learning support and some physical environment factors.

QCEC supports stronger alignment or flexibility in national ECEC legislation where kindergartens are located on schools sites with the legislation relevant to the schooling sector. For example, current funding models do not support the provision of learning/disability support services for kindergarten children that are available in the co-located school.

5. **Potential connections across other initiatives e.g. Australian Early Development Index, National Information Agreement, the National Partnership on Universal Access to early Childhood Education and the national education reform agenda**

QCEC supports the integration of other initiatives, especially with AEDI data which provides useful data about the early development of children. The AEDI data provides early childhood education and care services with information relevant for the children within the local community by identifying the domains that are ‘on track’ and those that need further attention. ECEC services can give attention to the areas in which children within a local community are vulnerable.

6. **Future arrangements for funding the regulation of the National Quality Framework under the NP NQA**

Funding for kindergartens and all ECEC services must be continuous regardless of political changes. Funding uncertainty is not desirable for any business and particularly for ECEC service providers and families ongoing funding must be assured. The financial viability of QCEC kindergarten services is a concern for delegated Catholic agencies, as the margins are very narrow, so the need for the assurance of ongoing government funding is required.