

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

## Submission form for *A national quality framework for early childhood education and care*

This document contains a standard written submission form, inviting you to provide information in response to the issues raised in the discussion paper *A national quality framework for early childhood education and care*.

You are welcome to use the standard form, or to provide a submission in your own words, addressing any or all of the issues raised in the discussion paper. Comment boxes have been sized to fit the pages of this document. Your comments should not be restricted by the space made available on this form. If you are providing a submission in an electronic format, please feel free to expand the space made available here. If you are providing a submission in non-electronic format, please feel free to attach additional pages, indicating which question(s) you are addressing.

Please send your completed submission to:

**Email:** [ECECQualityReformSubmissions@deewr.gov.au](mailto:ECECQualityReformSubmissions@deewr.gov.au)

**Fax:** 02 6212 9383

**Mail:** Productivity Agenda Working Group  
(National Quality Framework for Early Childhood Education and Care)  
c/- Early Childhood Quality and Care Group  
Department of Education, Employment and Workplace Relations  
Level 4, Juliana House  
10 Bowes St  
WODEN ACT 2606  
(Attn: Mr Philip Brown)

For more information on the national quality framework for early childhood education and care, please see the information on the internet site at [www.deewr.gov.au/COAGdiscussionpaper](http://www.deewr.gov.au/COAGdiscussionpaper), or telephone 1800 220 425.

Written submissions should be provided by Friday, 19 September 2008 so that they can be considered by the Working Group in developing an exposure draft of the National Quality Standards, which will be made available for public consultation later in 2008.

### **Public consultation forums**

If you would like more information on the public consultation forums, please see the information on the internet at [www.deewr.gov.au/COAGforums](http://www.deewr.gov.au/COAGforums), or telephone 1800 220 425.

*Please Note: Email attachments should be provided in Microsoft Word, Adobe PDF or a common PC-based image or text format. Internet and email are not secure mediums to transfer information. If you have concerns about using this form or if your submission is sensitive, please use the mail address provided, allowing sufficient time for the submission to be received, in Canberra, by Friday, 19 September 2008.*

*The information you provide to the Productivity Agenda Working Party will be used for the purposes of the national quality framework for early childhood education and care consultation process only. This includes all activities in relation to this process. Some or all of this information may be provided to the relevant Commonwealth, State and/or Territory agencies assisting with this process. Submissions will not be published or otherwise made public.*

---

---

## Form for written submissions (optional)

### Information about the submission

Please provide your details below. Consider providing your name, your organisation (if relevant) and your contact details. If you include your contact details you may receive correspondence in relation to outcomes of the consultation process, the development of the reforms or future consultation opportunities.

Name	Elizabeth McGarry
Organisation	Australian Association for Families of Children with a Disability
Address	Suite 2, 98 Morang Road, Hawthorn VIC 3122
Phone	03 9818 2000
Email	<a href="mailto:emcgarry@acd.org.au">emcgarry@acd.org.au</a>

You may remain anonymous if you choose, and your submission will still be considered.

### Your interest

Please outline the nature of your interest in the early childhood education and care sector. For example, you might be a child care provider, a member of a family using long day care or family day care, or an academic with an interest in early childhood education and care issues.

If you choose to remain anonymous you may still wish to provide some details around the nature of your interest in the early childhood education and care sector, as this may assist in understanding your comments.

The Association for Children with a Disability The Association for Children with a Disability is a non-profit organisation run by parents. We provide information, support and advocacy to Victorian families who have a child or young adult with any type of disability or developmental delay.

The Association has a strong interest in the provision of early childhood education and care, particularly as a large number of children with a disability access these services. The Association has a passionate commitment to advocate for the provision of high quality and inclusive early childhood education and care services.

## Consultation questions – National Quality Framework

### NQF1 - Strong quality standards

#### Content

- What do you consider to be key drivers of quality that should be included in the standards? Do you agree with those listed in section 5.2 of this paper? (Leadership and management, Relationships between staff and children, Family and community partnerships, Differentiated play-based curriculum, Physical environment, Staffing requirements and arrangements) Can you suggest others?
- How should the increased focus on early childhood education and care and outcomes for children be reflected in the new standards?
- Given that preschool can be delivered across a range of settings, what is the best way of monitoring and reporting on preschool delivery for four year olds (that is, in the year before formal school)?

The Association welcomes the emphasis on enhancing the learning and development outcomes of children within the framework. This emphasis needs to be for all children, including children with a disability.

The Association is concerned about the lack of emphasis on inclusion as a key driver of quality. Inclusion is a fundamental component of high quality service provision. Therefore, it is vital that inclusion be explicitly included as an indicator of quality.

#### **Coverage**

- What are the considerations in applying an integrated set of standards across all service types, including family day care, outside school hours care, Indigenous services, etc? Possible considerations: health and safety, physical environment and staffing standards in different settings, integrating preschool and child care.
- Would a core set of standards supplemented by service-specific standards overcome these barriers? For example, a modular approach which sets out a common core set of principles, supplemented by specific modules for each service type.
- What other options are there for an integrated set of quality standards?
- How could the standards take account of the age of children?

The Association believes that it is important that standards take into account both the age and developmental ability of children.

#### **Impacts**

- What are the potential impacts of the introduction of a new set of quality standards on early childhood education and care services? Possible considerations: workforce, financial viability, implementation arrangements, service provision.
- What are the particular issues with changes to the 'iron triangle' structural indicators of quality: staff qualifications, child-to-staff ratios, and group size? Possible considerations: workforce, training, relative costs and benefits of each indicator.

The Association anticipates that the introduction of a national quality framework for early childhood education and care will be relevant to children with a disability and will ensure higher quality services and improved outcomes for these children.

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

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

The Association believes that it is essential that the National Quality Framework and the Child Care Inclusion and Professional Support Program are linked. In particular, it is important that Inclusion Support Agencies and Inclusion Support Facilitators are adequately consulted not only in the development but also supported throughout the implementation to ensure that services are aware of the National Quality Framework and it's relevance for children with a disability.

It is also important that parents are provided with relevant and accessible information so that they are aware of the new system and what it means for their children's early childhood education and care.

### ***NQF2 - A quality rating system***

#### **Objectives**

- What do you think should be the objectives of a rating system? Do you agree with the objectives listed in section 6.1.2 (Indicator of service quality, Continuous improvement in the early childhood education and care sector, Information for families and communities)?
- Which objective is the most important? For example, is informing parental choice of service the primary objective ?

The Association believes that all of the objectives are important in the provision of a high quality early childhood service, however we are unsure as to how a quality rating system will improve outcomes for all children. Any strategies should be building up the capacity of all services to ensure that all children access the same levels of early childhood education and care.

#### **Design issues**

- What principles do you think should underpin the design of the rating system?
- How should services be rated against standards? What should the rating system look like in order to achieve its objectives? Possible considerations: measurement, attainment or other approaches, how the rating system will link to the standards, accreditation and licensing.
- What kind of information should the rating system provide to parents and others in the sector? Possible considerations: grades of quality at each level e.g. A-E, incentives for continuous improvement.
- What potential risks are there in introducing a rating system? How could potential negative implications be minimised?
- Who should carry out the rating process and why ?

The Association is concerned about the implications of the introduction of an A-E rating system and possible ramifications for children with a disability and their families.

Families of children with a disability would like to be able access information about potential child care services and in particular families would like to know about services' commitment to and experience in delivering an inclusive service to children with a disability.

#### **Coverage**

- Should the rating system include all services in the early childhood education and care sector e.g. long day care, preschool, family day care, outside school hours care, Indigenous services, etc? What are the implications of bringing all service types under one rating system?

If all child care service types are brought together under one rating system it is important to remember that these services provide care for children from birth until 18 years of age. Young people with a disability often access outside school hours care services, particularly after school and vacation care. It is important that any rating system take into consideration the distinct needs across age and developmental stages of all children and young people.

#### **Impacts**

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

N/A

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

- What transition arrangements do you consider appropriate to implement the proposed changes? What supports for the early childhood education and care sector do you think would assist these transitions?
- What timeframes are required to allow services to transition to a new rating system?

N/A

### ***NQF3 - Streamlined and/or integrated licensing and accreditation arrangements***

#### **Streamlining and/or integration**

- What are the current issues or problems with the existing regulation, licensing and quality assurance system?
- What changes to the structure of the quality assurance system would you suggest to increase consistency, effectiveness and efficiency across service types and/or jurisdictions? How might these changes affect you or your service? Possible considerations: administration, governance and delivery arrangements, reducing administrative duplication.

One of the central issues of the current regulatory and quality assurance system is that there is minimal emphasis on including children with a disability, whether this is in relation to, for example, accessibility or programming.

The National Childcare Accreditation Council's Quality Improvement & Accreditation System for long day care services recognises the different abilities of children through the Quality Areas of Staff Relationships with Children & Peers, Programming and Evaluation, and also Children's Experiencing & Learning. However, there are few explicit references to including children with a disability. State based regulations also do not address regulatory issues concerning children with a disability, such as change facilities for older children.

It is vital that the inclusion of children with additional needs is explicitly detailed in the National Quality Framework, otherwise, as families across Australia have experienced, child care services will continue to exclude or inadequately care for their child/ren with a disability.

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

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

One of the issues for the Association in relation to the transition to the new system will be that we are often the first contact point for parents of children with a disability when they have questions or issues about services. Therefore it is vital that adequate accurate and accessible information about the new system is available to share with families.

#### ***NQF4 - Workforce***

##### **Workforce**

- How could the status and recognition of the early childhood education and care workforce be raised?
- What could be done to address limited advancement options and career paths?
- What possible approaches could be used to improve retention strategies?
- What strategies could be adopted to increase the numbers of Indigenous child care workers and teachers?
- What is the likely impact of any suggestions on the price of and demand for services?
- What possible approaches could be used to address shortages of early childhood teachers in regional and remote areas, long day care services and community preschools?

N/A

#### **Consultation questions – National Early Years Learning Framework**

##### ***EYLF1 - Purpose of the framework***

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

- What form or format should the Early Years Learning Framework take that would be most useful to you in guiding your programming for young children?
- How prescriptive do you think the Early Years Learning Framework needs to be? Do you have a preference for the actual length of the Framework?
- What type of supporting documents/resources would be most valuable for parents and others working with young children (e.g. family day carers, playgroups)? Do you have any views on the format and size of such documents?
- Do you see any issues with the implementation of the Early Years Learning Framework in all education and care settings from July 2009? What suggestions would you offer to overcome these issues?

The Association believes that a philosophy of inclusion underpinning the development of the National Early Years Learning Framework is of paramount importance.

It is important that any information provided to parents is clear, concise and accessible, translated into community languages and in diverse formats. Information brochures, online information, booklets, telephone hotlines or newspaper advertisements may be appropriate. It is important that services, community organisations and peak bodies are provided with relevant and up-to-date information so that they can also talk to families about the National Early Years Learning Framework.

### ***EYLF2 - Questions relating to research findings***

- Is the analysis of the trends in the literature accurate and comprehensive? Are there any issues in the research relevant to the development of the framework?
- Do you support a focus on language and communication development, social development and play-based learning in the framework ?
- How would you define the roles of the educator and the child in the learning process in the framework?

The Association would like to see a greater emphasis on the research and literature relating to the importance of the inclusion of children with a disability in early childhood services. While there is little Australian based research, international research highlights that children with and without disability benefit from inclusive practices in mainstream child care settings. Children with additional needs reach the same cognitive achievements in inclusive settings as they would in segregated settings. Inclusion is fundamental to quality and it is vital that research highlighting these findings is reflected in the development of the framework.

The Association supports the focus on language and communication development, social development and play-based learning, however it is important that this includes the specific requirements of providing inclusive and appropriate services to children with a disability.

### ***EYLF3 - Foundations for the framework***

- What would you want included in the framework's vision for early learning and children?
- Would you support the values and rights proposed to underpin the framework?
- What other values and rights would you want included and why?

The Association would like to inclusion form part of the framework’s vision for early learning and children.

We certainly support the values and rights that are proposed to underpin the Framework, in particular the UN Convention of the Rights of the Child and the focus on the rights of children with a disability or an additional need as specified in Article 23. Below is an excerpt from the Convention.

*Article 23 – UN Convention on the Rights of the Child*

1. States Parties recognize that a mentally or physically disabled child should enjoy a **full and decent life**, in conditions which **ensure dignity, promote self-reliance and facilitate the child's active participation in the community**.

2. States Parties recognize **the right of the disabled child to special care and shall encourage and ensure the extension, subject to available resources, to the eligible child and those responsible for his or her care, of assistance for which application is made and which is appropriate to the child's condition and to the circumstances of the parents or others caring for the child.**

3. Recognizing the special needs of a disabled child, assistance extended in accordance with paragraph 2 of the present article shall be provided free of charge, whenever possible, taking into account the financial resources of the parents or others caring for the child, and shall be designed to ensure that the disabled child has effective access to and receives education, training, health care services, rehabilitation services, preparation for employment and **recreation opportunities in a manner conducive to the child's achieving the fullest possible social integration and individual development**, including his or her cultural and spiritual development

...

This excerpt highlights the critical nature of inclusion as a fundamental principle in designing the framework.

#### ***EYLF4 - Building the framework***

- How should the curriculum framework provide guidance and strategies to meet the various learning and development needs of the children including those with special needs, English as a second language and/or challenging behaviours?
- Is it appropriate for children’s learning to be assessed? If yes, how should children’s learning and development outcomes be assessed?
- How would you ensure the curriculum framework is appropriate for all educators, regardless of qualifications?
- What kind of professional development will need to be provided in order to support educators in using an Early Years Learning Framework?

As we have discussed in previous sections of our response, it is vital that both the quality framework and the Early Years Learning Framework explicitly provide guidance and strategies to meet the needs of children with a disability. It is important that there is considerable detail and supporting information provided so that practitioners are aware of ways to work alongside children with additional needs and their families. The Association would welcome the opportunity to participate in developing positive strategies in the Early Years Learning Framework.

It is important that when children’s learning and development are assessed, there are specific proposals, targets and measures for children with a disability so that their needs can be clearly identified and met. Children with a disability are often unable to reach the same targets and benchmarks as other students within their age cohort. Unless specific measures are put in place for children with a disability as a cohort, they will be not be represented and there will be no accountability or redress at the service and departmental level.

