



Regulation Impact Statement for Early Childhood Education and Care Quality Reforms

Response from Early Childhood Australia

September 2009

ECA supports the vision that underpins the National Quality Standards and Rating Framework

ECA believes that this is a moment in time when it is possible for the nation to chart a course for real quality reform in the early childhood education and care sector. We believe this because the proposals in the Consultation Regulation Impact Statement for Early Childhood Education and Care Quality Reforms (RIS) are an attempt to come to terms with what the evidence says about the structural and process characteristics of high quality early childhood services. This is a first for Australia.

Acting on the evidence

However there is potential in the planning for the implementation of proposed quality reform agenda as set out in the RIS to fall into the trap of asserting the evidence but then proposing a way forward which does not take its implications fully into account. Doing this will short change children and the nation in the short and long term and miss a unique opportunity to refocus the system on quality.

Ending the 'quality pretence'

Previous reforms such as the Quality Improvement and Accreditation System (QIAS) have fallen into this trap. The current QIAS system has operated in a way which has suggested that, irrespective of whether programs reflect the evidence about the structural and process characteristics of a quality service, it is possible to deliver a high quality service without them. NCAC reports that at July 2009 93% of long day care centres that have completed the QIAS process are accredited. Of these 98% were judged to be of high quality. http://www.ncac.gov.au/report_documents/qias_qual_trends_june09.pdf

It is hard to see how this is possible when for many long day care centres:

- Staff: child ratios are worse than what the evidence says is necessary
- Programs are rarely led by four year degree qualified early childhood teachers
- Finding staff let alone qualified staff is difficult and
- Staff turnover is high. This necessarily undermines the quality of the relationships between adults and young children. It also undermines the development of staff experience which is essential to people taking leadership roles within the sector.

Notwithstanding the best efforts of providers and early childhood staff it is clearly not possible in this context for the majority of long day care services to be delivering high quality programs. The effect of a process which has allowed providers to believe that they are doing so has built a false notion of what the nature of quality is. It has certainly made it more difficult to build a better understanding of what quality looks like in practice. Similarly it has undermined the capacity to build a constituency for quality amongst parents - a constituency that will be essential to the funding of the system into the future.

What is clear is we cannot have it both ways. We either build quality services based on the evidence or we do not have a quality service.

ECA supports Option 4 with some qualifications

For this reason ECA supports Option 4 because it sets goals which most closely reflect the evidence. ECA understands that it will take time to achieve these goals. This is a trade-off that ECA is willing to accept provided that the plan and timeframe to achieve these goals are explicit and that there is an annual public report to the parliament on progress toward the achievement of the goals.

The qualification to this position is ECA's concern about the *additional university qualified professional* that is specified in the RIS. Notwithstanding that there are a range of university courses preparing graduates of employment in early childhood services, ECA is concerned about the potential this requirement has to dilute the commitment to four degree qualified early childhood teachers.

The professional leadership of staff and leadership of the service go hand in hand. Drawing on the evidence from schools it is possible to assert that the best services will be those led by experienced degree qualified early childhood teachers and where children's programs are also led by EC teachers. ECA's position therefore is that four year degree qualified early childhood teachers should provide the pedagogical leadership for the services as a whole and specific leadership in the education and care rooms. This applies equally to children under two year of age as to older children.

ECA is not blind to the challenges associated with the implementation of Option 4 or that building a constituency for quality amongst parents will be central to meeting these challenges.

The National Quality Standard

Fundamental to Early Childhood Australia's response to the RIS and its support for Option 4 is the assumption that the National Quality Standard (NQS) consists of two linked elements, both of which are integral to it. These elements are the National Quality Standard level in the National Quality Standard and Rating Framework and the National Quality Standard which relates to the structural elements including child-to-staff ratios and qualifications – Option 4 for ECA.

The current document does not make this link clear. Not to do this puts at risk the quest for improved quality which is the purpose of these proposed reforms.

The use of the term National Quality Standards for three different purposes in the document is confusing and will need to be resolved.

The current NQS in the rating framework is set too low

The current NQS in the rating framework is set too low. Much of what is now in the High Quality level should be in the NQS. As it stands if what is in there currently is all that is required, it cannot achieve the outcomes for children that are sought in RIS.

ECA also believes that the goal set by the National Quality Standard must reflect what the evidence demands is necessary for good outcomes for children and not be constrained by structural and funding hurdles that will need to be resolved to reach it. Children – and our Australian society - deserve no less.

Some examples of changes necessary to both the High Quality Standard and the National Quality Standard

What follows are some examples of the kinds of changes needed in the proposed NQS if it is to provide a strong base for quality ECEC services. ECA would be willing to do further work to ensure that the standard reflects the evidence and is an appropriate NQS.

The proposed quality areas are listed below along with **examples** of ECA's recommended changes:

Educational Program and Practice – amend the second standard at the National Quality Standard level to include the following:

... and that the program reflect the evidence about effective in ECEC programs such as:

- Encouraging episodes of sustained shared thinking in conversation with children
- Cognitive and social development are viewed as complementary (go hand in hand)

- Balance between practitioner and child initiated activities
- Behaviour management practices support children to work through problems in systematic ways
- Good curriculum knowledge is evident in curriculum differentiation, formative assessment and detail of the program
- Evidence of knowledge of how young children learn
- Differentiated learning opportunities that meet the needs particular children and groups
- Provide formative feedback to children and families.

Children's wellbeing and safety – move the following from the High Quality level to become a requirement at the National Quality Standard level:

The service assists families' access to additional support to meet the particular needs of each child.

Physical environment - delete the following from the High Quality level as it is out of the control of many services:

The service stands out in its effectiveness of design, arrangement of space and suitability of purpose.

At the National Quality Standard level delete the first standard and substitute the following:

- The service maximizes the potential of its design to deliver a quality program.
- The physical environment demonstrates that services understand how children learn, providing appropriately for challenge, risk and exploration and assumes that children are capable and competent.

Staffing arrangements – at the High Quality level, in Standard 2 substitute the word 'effective' for the word 'innovative'. Standard 3 at the High Quality level belongs in 'Relationships and interactions'.

At the National Quality Standard level include additional standards as follow:

- Staffing arrangements provide for release time for programming and professional conversation
- Less qualified and experienced staff are mentored and supported by the pedagogical leaders in the service.

Relationships – interactions within the service - move the following from the High Quality level and incorporate it into Standard 1 at the National Quality Standard level so that it becomes an essential requirement.

Strong and warm relationships between children and adults are recognized as exemplary.

It is inconceivable that given the evidence the requirement for strong and warm relationships would not be at the National Quality Standard level.

Collaborative partnerships with families and communities - This section needs significant further work but should include the requirement that

Services provide families with information about what is happening in the service and why and what this means for their child's learning and development.

The evidence supports this inclusion.

Leadership and service management – Include the following at the National Quality Standard level:

- Management and leadership actively promote, support and evidence based programs and ensure that families understand what this means.
- Management and leadership encourage and support staff to undertake ongoing and certified professional learning
- Management and leadership have a planned approach to increasing the qualification of staff
- Management and leadership require staff to be the best they can be and to continuously improve.

The commitment to continuous improvement is fundamental and will need to be described and presented so that the sector understands what it means. This is strongly related to the development of a quality culture in a service.

The implications of ECA's position are that:

- The achievement of the NQS will require achievement of the standard in both of its elements
- What is in the seven quality areas at this level must be tested against the extent to which it reflects the evidence – that is, what the evidence says is fundamental to the achievement of good outcomes for children. This includes things like responsive and warm relationships with children and the need for regular (daily) professional conversations with staff about the program
- The achievement of the NQS by the majority of services will necessarily take time
- Quality improvement has to be built into the Rating Scale so that progress can be seen from the beginning. The system then must require a planned and monitored focus on quality improvement by all services which will provide for observable and measureable gains on both elements of the NQS over time.

Fundamental concerns

Aboriginal children and families

Australia has now committed itself to a process of reconciliation and to bridging the gap in outcomes for Aboriginal and Torres Strait Islanders. This means that the NQS, particularly in the quality rating system, should require an explicit, conscious and systematic focus by all services on this issue.

This focus is not just about services designated as Multifunctional Aboriginal Children's Services or those that are part of the Aboriginal preschools program. Nor is it important for other services only because 85% of all Aboriginal and Torres Strait Islander children are in mainstream services. It is important because true reconciliation will require a cultural shift by the non-Aboriginal population which will see the term "us" redefined to become inclusive of these children and families.

Notwithstanding the commitments made in the Melbourne Declaration on Educational Goals for Young Australians by the Ministerial Council on Education, Training and Youth Affairs and by COAG, as noted in the introduction to the Early Years Learning Framework (EYLF), ECA believes it is unacceptable that the EYLF itself has not highlighted this issue. This failure in the EYLF must not be seen as a precedent to justify excluding specific reference to Aboriginal and Torres Strait Islander children and families in the National Quality Framework and Rating System. Indeed, given the Government's stance on reconciliation it has a moral obligation to exercise leadership on this issue, particularly in ECEC arena. It is not good enough to argue that programs which meet the National Quality Standard will necessarily have considered this issue. This has not been the case in the past and there is little reason to believe that it will be so now. More than pious hope is required if we are to make a difference in this area.

Children with additional needs

ECA is also concerned that no consideration is given in the document to meeting our obligations to children with additional needs. This work needs to be done as a matter of urgency.

Implementation

While understanding that many services have argued for an implementation process which is less intrusive and time consuming than the current Regulation and QIAS systems, ECA believes that given the magnitude of the changes that will be required it is inevitable that a robust system will involve significant effort and commitment by services. This is as it should be. A great deal of public money

underwrites the operation of these services. Given this, it is important to develop an approach to implementation which of itself makes a contribution to the quality of the service. Fundamental to this is a decision about whether the implementation process will be event or improvement focused.

“Accreditation” is a process

Accreditation (for want of a better word) is either an event which measures performance at a particular point in time or it is an ongoing process which includes an accreditation event and also drives continuing quality improvement in each service. That is, it is either an event with a start and finish date, or it is a process which includes assessment against the standards and of progress made towards them. The linking of accreditation and quality improvement will ensure that the pressure for quality improvement continues beyond the accreditation event. It will also mean that the focus of the process will be on the practice of these services.

The new system should support the development of a quality culture in services. Quality should be a conscious and everyday focus, not simply on the agenda at the time of accreditation. A required and systematic focus on quality improvement (if linked to the next accreditation event or spot check) will support the development of a culture of quality in services.

ECA support for rationalisation

ECA understands and supports the objective of rationalising the implementation system.

The assessors

However this is done it is critical to the integrity of the system that the people who are responsible for assessing services’ status in relation to the NQS must be experienced four year degree qualified early childhood teachers and specialist trained for this task. It is not possible for people without this qualification and preparation to make informed, professional judgments about a service’s progress toward the National Quality Standard particularly in the Quality Rating Framework.

One of the key challenges to be faced in building a defensible approach to the assessment of services against the NQS is that there are very few services demonstrating high quality practice. This, coupled with the fact (previously noted in this submission) that many services are currently rated as high quality services notwithstanding their failure to meet evidence based structural and process standards, will make the task of the assessors critical.

ECA supports the development of levels of achievement within NQS

Given the length of time it will take for all services to reach the National Quality Standard specified in Option 4 of the RIS it is crucial that progress toward the NQS in the Rating Framework can be measured through a quality improvement plan. This suggests the possibility of levels within the NQS in the Rating Framework. To do otherwise is to create the pressure suffered by the current QIAS which is to rate services as reaching the NQS when the structural components of quality do not exist. Doing so will also be important in maintaining motivation and commitment to the system within services .

National Quality Standard and Rating System
Excellent
High quality
National Quality Standard
Step 1
Step 2
Step 3
Operations requirements
Unsatisfactory

A conscious and systematic focus on Aboriginal Torres Strait Islander children and families

As already indicated ECA supports an explicit focus on Aboriginal and Torres Strait Islander children and families in the RIS and in the national quality framework and rating system.

Building a constituency for quality

Building a constituency for quality amongst parents is in itself a challenge. ECA has argued in the past and does so again now that it is not until parents are allies in the quest for quality that governments will make the investment necessary to fund a quality system.

The hard reality is that until parents understand that what is happening now in many ECEC services (including in all likelihood the one their child attends) is not quality practice, they will not accept the increased costs to government and to themselves that are required by provision of a quality service. This is not to discount the efforts made every day by staff in early childhood services or their professionalism but again we either accept the evidence about the fundamentals of quality programs or we do not. The comment on p9 of the RIS that “Parents may view the

benefits of child care in different terms to experts in the field, and as a result may be less willing to pay a premium for higher quality care as defined from a child development perspective” is instructive. What this comment does not address is what the response of parents would be if they were fully aware that the care their child was receiving was poor quality.

Faith in the market to drive up pressure for a quality service is misplaced, particularly when it is premised on the proposition that giving parents information about what a high quality service looks like will be the factor which drives the market force i.e. the parent decision. At present, the ECEC decision making of many parents is driven by quite basic considerations such as the cost of care, getting child care at all, getting child care near work/home or their other carers’ homes. In this context better quality elsewhere is not often likely to be a driver to change services and making demands for quality improvement could make the interactions in their existing service strained. And given the analysis in the RIS, better quality elsewhere might be hard to find. The market forces logic is challenged by these factors. Despite the faith in outcomes from correcting ‘information asymmetries’ indicated in the RIS, simply giving people choice does not magically increase the availability of quality services.

There is of course an alternative construction of the meaning of “information asymmetries” which is that the information parents are currently lacking is about the limitations of the current system in regard to child: staff ratios and staff qualifications and staff stability and what this means for the quality of the service their child attends. This would certainly result in pressure for change and is, as ECA has said, fundamental to the acceptance of increased costs over time.

ECA understands that telling parents the truth about childcare quality would be unpalatable. At the same time it defies logic to propose such major change and not openly acknowledge the faults in current system. Parents want what is best for their children and leveraging this energy in partnership with them and in the context of evidence based quality improvements has real potential to provide a way forward which properly informs parents at the same time as mitigating the potential negative fallout from this information.

The evidence and the RIS – What it will mean to take it seriously?

Defining staff: child ratios - ECA understands staff to child ratios to refer to actual adult: child contact time, a

point made by Munton et al in their research brief. The practice in Australia often is to divide the overall number of staff into the number of children and regard that as the ratio. This takes no account of the times that staff are away from the children for breaks, program preparation, discussions with one another or with parents etc.

The interaction of variables -The evidence given prominence in the Consultation RIS particularly relates to high staff: child ratios and qualified staff, including staff with four year early childhood teaching degrees. These two variables interact in complex ways to determine the quality of the relationships, programs and outcomes for children in ECEC services.

In fact the relationship between high staff: child ratios and qualified staff and the achievement of good outcomes for children from participation in ECEC services is not linear as is implied in the RIS. That is to say, high staff: child ratios and qualified staff lead by EC degree qualified teachers will not necessarily lead to good outcomes. Staff stability, strong EC leadership and professional conversations and the robustness of EC qualifications are also a fundamental part of the quality equation.

High staff: child ratios clearly matter. They provide the baseline potential for the development of the quality relationships between children and staff which underwrite good outcomes for children. However, this potential can only be realised in the context of staff continuity and stability. The warm, responsive, predictable relationships and interactive engagements so fundamental to children’s well being and learning require both high staff: child ratios and staff continuity and stability. Neither are enough on their own. Also in the equation is the presence of qualified staff including trained teachers in leadership positions and working alongside lesser qualified staff.

Similarly the presence of qualified staff (including staff with four year early childhood teaching degrees) does not of itself guarantee the delivery of high quality programs nor does it guarantee staff who understand and work intentionally toward the development of responsive and reciprocal relationships with young children. The quality and capability of the staff is, to a significant degree, dependent on the robustness of their qualifications.

Early childhood qualifications - The robustness and appropriateness of early childhood qualifications, including four year early childhood teaching degrees, is fundamental to the capacity of graduates to provide the programs that are required. Currently there is no mechanism for assuring the quality of the Certificate III and Diploma qualification. What this has meant is that it is possible to achieve these

qualifications with minimal course engagement. ECA is not necessarily making a challenge to competency based training, although its effectiveness in providing high quality staff for this sector has not been demonstrated. This is, however, a challenge to the calibre of course requirements and supervision provided by the Registered Training Organisations providing these courses. The proliferation of private RTOs and the contribution of these courses as an export industry to Australia's bottom line have exacerbated this situation.

At the same time it is also important to acknowledge that some of the structural elements of these courses pose fundamental constraints on their fitness for task. For example the Competency Standards Framework requires that the supervisor of a student holds only the qualification for which the student they are supervising is studying. This means that a Certificate III student can be and generally is supervised by a person with a Certificate III and so on. The potential for a vacuum in mentoring and professional leadership is clear.

It is equally important that the people with four year early childhood teaching degrees are equipped with the knowledge, understanding, skills and commitment to meet children's needs (including their physical care needs) and to reflective practice necessary to provide high quality ECEC programs. These people carry the weight of high expectation in the achievement of the vision that underwrites the RIS. Whether these courses focus on children aged from birth to eight or birth to five they must ensure their graduates are fully equipped to meet the contemporary demands of ECEC settings. This must include effective preparation for working with children under two years old. In this vein it should be noted that good ECEC practice is necessarily contextualized and that engagement with the community is a non-negotiable element of this. What this means is that EC teachers must know well the significance of integrating and contextualizing their practice and their service with the community they serve.

Issues around the robustness of qualifications will have to be addressed if the goals of the national quality agenda are to be realised.

Leadership, professional development and

professional conversation - The evidence is equally clear that early childhood leadership, professional development and onsite regular (daily) professional conversation are also essential to high quality programs. The requirement that services make provision for this should be included in the National Quality Standard in the quality rating framework.

The RIS rightly makes it clear the early childhood teachers are essential to the achievement of goals of the quality reform agenda. It also emphasises the role of these staff in the providing early childhood leadership in ECEC services. Here again it is important not to assume that just having more early childhood teachers in services will necessarily equate to improved program quality and stronger early childhood leadership. Teacher retention, continuity and experience are equally important.

The RIS recognises that achieving the required number of teachers in services will take time but there is no evidence in the document that the issues of staff turnover and retention have been taken into account in the projections about how long it will take to get sufficient teachers into ECEC services. It is not sufficient to project increases based on numbers of students exiting courses or indeed the numbers of teachers entering the sector.

Further, ECA understands that notwithstanding the churn of early childhood teachers into and out of ECEC services there has been an overall increase of teachers in these services in recent years. However an increase in the absolute numbers of teachers does not mean that there is lower turnover of staff or that the number of experienced teachers in the sector is growing. What these projections fail to connect with is the absolute importance of staff stability for the quality of the relationships between staff and children and the delivery of high quality programs and the relationship between time served and leadership capacity.

Staff stability and on-the-job experience is also important for the development of leadership skills. It is unlikely that a newly graduated early childhood teacher will have the experience necessary to provide pedagogical leadership to other staff within a service. In the school system it is standard practice to provide support and mentoring to new graduates as they hone their skills in the classroom. The RIS appears to assume that simply because an early childhood teacher is in a service that the required leadership will be apparent. This assumption is both unrealistic and incorrect.

The evidence also indicates that strong programs of professional development exist in services that deliver consistently high quality, yet these are recognized as one of the most vulnerable of expenditure line items when savings must be made in the operation of a child care centre's budget. Again, the NQS must explicitly require the inclusion and demonstration of performance in this area.

It would be easy to ignore the evidence that regular and ongoing professional conversation between staff supported by a qualified early childhood teacher is fundamental to

the delivery of a quality program. Focusing on professional discussions is something which cannot be done while staff have responsibility for children. Making this possible will incur an additional cost for services. However, in keeping with ECA's test of the efficacy of the national quality standard i.e. match with evidence based standards and practice, the NQS must be explicit in including a requirement for professional conversation.

Even this limited analysis makes the problems seem intractable. ECA does not believe this. What it does believe, however, is that unless the problems in all of their complexity are faced there is no prospect that they will be solved.

Improved wages, conditions and a career pathway are essential

Whilst ECA understands that the question of wages, conditions and career structures are outside the purview of the RIS it nonetheless believes that a key to resolving the basic question of the quality, qualifications and turnover of staff in ECEC services is in this area. While ever people are paid five dollars less an hour than call centre workers and without improvements including increased salaries across the sector, pay parity between teachers in ECEC services and those working in primary schools and a career structure which provides for career progress, it is unlikely that the staff issues currently facing the sector will be solved.

ECA is concerned that the current Award Modernisation process may result in lower salaries for teachers in some states and lower conditions such as reduced long service leave conditions. If this occurs the issues outlined in this submission will be exacerbated.

ECA believes that progress can be made on many of the issues it has raised in this submission.

One of the possible ways to tackle the issue of getting teachers with experience into child care is to encourage experienced Children's Services Diploma holders who have been in the sector for some time to upgrade their qualification to a teaching degree. The strength of this is that these people understand the nature of the sector, have experience to build on and therefore potentially provide a leadership pool for the sector. Incentives would need to be targeted to address the disincentives for people who are currently working fulltime to undertake further study and whose wages are low.

To be successful incentives must enable staff to take time off work without losing pay. It is extremely difficult to undertake tertiary study after working face-to-face with children all day. Child care is hard and demanding work.

There are existing examples of policy levers the Commonwealth has used to encourage people to study and to go to hard-to-staff areas etc. These incentives pay a living allowance via bonded scholarships which require graduates to work in a particular area or stay in a particular industry for a specified period of time.

Such allowances need not assume full-time study - indeed there may be benefits in being in the workplace concurrently with studying. Scholarships of this kind should require a commitment to remain in the sector for a period of time after graduation thereby building the experience pool. If linked to a fee waiver this approach would provide a real incentive for people to both upgrade qualifications and remain in the sector.

There is also scope for developing new approaches to the requirement for practicum. The issue of whether a defensible and robust approach to practicum can be constructed that allows students to undertake practicum in their own services is one that will need to be thought through. Effective supervision is just one of the issues that would need to be resolved in finding an answer to this question. However if the problems are faced without preconception and prejudice they should be able to be resolved. Doing this would overcome another major disincentive to further study by experienced Diploma qualified staff.

There are other examples of schemes which involve financial incentives for people who have left particular professions to come back to them which could be part of a suite of incentives to attract qualified teachers into the sector.

The Excellence Rating

ECA supports the concept of the tiered rating system and believes that both the High Quality and Excellence tiers will give services incentive and recognition for achievement beyond the requirements of the National Quality Standard.

ECA believes that only services which have already reached the High Quality standard in all seven areas should be able to apply or be nominated for the Excellence rating. In this context, ECA would prefer not to use the term 'innovative'. This term is problematic because in putting the focus on whether a service is innovative it may distract from the purpose which the innovation is meant to serve and become innovation for innovation's sake.

ECA believes that the excellence rating should be reserved for services which demonstrate outstanding practices in particular areas, for example:

Responsiveness to their community: this would recognise that all services are not the same and that each faces different demands in meeting the needs of its particular community. It also recognises a fundamental feature of effective programs which is that they are contextualised to their place and their community. This would also allow services to make a case for an excellent rating because of outstanding practice in working with particular groups of children and families, for example:

- Aboriginal and Torres Strait Islander families and children
- Children and families in rural and remote communities
- Children with additional needs and their families
- Children and families from culturally and linguistically diverse backgrounds

And/or

Focus on one or more of the Government's policy priorities such as

- Reconciliation with and closing the gap for Aboriginal and Torres Strait Islanders
- Promoting mental health and reducing mental health issues in early childhood
- Outstanding progress towards the implementation of the EYLF
- Building a more sustainable environment
- Social inclusion
- Preventing obesity

The strength of this proposed framework is that it challenges services to achieve excellence in both an essential characteristic of a quality program (responsiveness to the community being served) and/or to see themselves as implicated in finding solutions to the board issues facing the nation (the focus on one or more government priority area/s).

The same outcomes from all services?

Children, families and communities around the country need a range of services types and different service types need to be recognised as legitimate in their own right. What we expect of services should be determined by their purpose and what the evidence suggests about quality delivery and standards in each service type.

This implies a further recognition that so far as different service types have different purposes then aspects of quality will look different, as will anticipated outcomes.

In considering this question, ECA recognises that the evidence about the structural and process characteristics of centre based ECEC programs is strong as is acknowledged in the RIS. The significance of staff: child ratios and of early childhood qualified teachers is uncontested. Similarly the evidence about the importance of responsive, warm and predictable relationships to children's well being and learning is very robust.

ECA accepts that the conclusions from this evidence cannot all be directly transferred to all service types. However, we do believe that

- i. As far as possible the standards for Family Day Care (FDC), mobile services and other service types should be as rigorously and strongly based as those for centre based ECEC.
- ii. The standards should assume the same need for quality improvement in these services types as they do for centre based care. (We note that on the whole this is not the case in the options for FDC as presented in the RIS.)
- iii. The standards should be explicit in their requirements for the well being of children.

To achieve this will require that relevant learnings from the available evidence are applied in ways appropriate to the different settings and purposes of the different services types.

For example, while there has been little research into home based ECEC programs, there has been a great deal of research about the impact of rich home environments on children's early learning. This, coupled with the evidence about the significance of the development of trusting and reciprocal relationships with young children builds a picture of the characteristics of home environments where children do well. In the same way the broader literature about good parenting is potentially as rich for this purpose.

A similar point can be made about mobile services which are not delivering a consistent preschool program. These services are true family and children's services providing high quality activities for children, support for isolated parents and building connections with the community. They are often a referral and/or link into other needed services. Indeed in some ways these services are a different take on the idea of the integrated service.

The common thread in all of these services is significance of the quality of the relationships with the children and families. It is fundamental. With specific regard to the FDC

Options in the RIS, ECA believes that the staff: child ratios need to be much less ambiguous. The current staff: child ratio set out in Option 2 of one adult to four children under school age is unhelpful. As currently specified that ratio would allow a carer to care for four babies. This is clearly not what is intended and if it is it is unacceptable.

It is important that the National Quality Agenda advances the work of differentiating and articulating expected outcomes from different service types, again in line with their purpose. This will support necessary differentiation in the NQS framework.

For example - in FDC and Mobile services it is often not possible to have programs directly led by a qualified early childhood teacher, in which children participate in a number of sessions each week. We should however, make it possible and indeed require that services have proportionate access to a qualified early childhood teacher to provide support and mentoring to other staff in their work.

Again, because of the level of access to qualified early childhood teachers and different settings, priorities and service patterns, these different service types will engage differently with the Early Years Learning Framework and will not reflect the full requirements of the national quality standard set out in the quality rating framework. What these services can do however is support families, model high quality interactions with children (including sustained and shared conversations) and help families to create the rich environments which will ensure that their children are positioned well for the future.

It is important that the ECEC Quality Agenda acknowledges the uniqueness and value of the different service types and builds on their strengths rather than forcing them into a mould designed for centre based care.

In conclusion

ECA believes that the intention and potential of these proposed reforms is to transform children's services and the future of this country. This cannot be achieved in short term however. To attempt to do so will be to squander the unique opportunity that has been created by a willingness to confront the implications of the research.

ECA believes that it is possible to persuade the community to accept a planned long term approach which will require a significant increase in private and public investment. However ECA also believes that to do this it will be essential to be open about the limitations of the current system.

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