

**Integrated Child Care Quality Assurance (CCQA):
Draft Standards for discussion**

**Early Childhood Australia Response
10 April 2007**



1.0 Introduction

This submission from Early Childhood Australia (ECA) does not address the detail of the draft standards circulated for discussion. ECA members are participating actively in the development of responses, either in their state or territory ECA Branch or in conjunction with other groups around Australia. These responses will focus on the detail of the draft standards.

The national Board of Early Childhood Australia shares the concern that will be raised in many of those submissions that the standards, as circulated, are too generic and so fail to reflect adequately:

- the differences between children of different ages; and
- the differences between the various service types.

As well as this, ECA supports the proposition that the standards as circulated situate the principle of inclusion as something separate from, rather than integral to, the everyday work of every service, as it should be.

ECA believes that the drivers for the integration of the current quality-assurance systems should be:

- streamlining the system to improve the quality and integrity of the system itself; and
- efficiencies which will deliver savings in the administration and operation of the current systems of quality assurance. ECA believes that savings should be redirected to the administration and operation of the quality improvement component of the new system.

These two drivers should also be equally weighted.

However, there is considerable concern in the sector, given the nature of the draft standards, that the key driver for this process is the generation of savings in the administration and operations of the three current systems. There is little evidence of a commitment to the building of a new system which will actually contribute to improving quality in services on the ground.

2.0 Qualified support for an Integrated Child Care Accreditation and Quality Improvement System

Early Childhood Australia has given *in principle* support to the proposal for an Integrated Child Care Accreditation and Quality Improvement System, on the basis that it makes good sense to bring together the common elements of the existing systems. However ECA's continued support for this model is dependent on evidence of the following in the new system:

- A set of core principles/standards which apply equally across all service types and which, while recognising the clear commonalities that exist in the delivery of all childcare services, do not trivialise the differences inherent in each service type.
- Principles of inclusion that are specifically captured in all principles/standards/indicators to support them appearing in all areas of practice.
- Specific principles/standards/indicators in relation to program and practice which recognise that the needs of children vary according to the age of the child, the setting and the number of hours each child spends in care.
- Specific indicators which ensure the integrity of specific service types by recognising the implications for practice of the different environments in which child care is provided. That is the new system must develop indicators which specifically and deliberately leverage those aspects of particular service types which differentiate them from others.

The goal is not the same accreditation indicators for all services, but rather a model which has a set of core principles/standards to which all services are required to respond, plus specific indicators against these standards for each service type.

3.0 Quality Improvement and the new system

From ECA's perspective, the primary purpose of any accreditation system is to advance the capacity of each childcare service to deliver on the Government's mission—to provide high-quality children's services for children and families.

In short, the new accreditation and quality improvement system should assess the degree to which current practice in each service complies with the accreditation standards, as well as to leverage quality improvement in all services into the future. The key word in the purpose statement is 'advancing', which implies progress towards the goal of high quality rather than the achievement of that goal.

What this means is that a childcare accreditation system must focus on:

- the here and now of child care service delivery—that is whether the service is meeting accreditation standards.
- the development, post-accreditation, of quality improvement plans that reflect the outcomes of the accreditation event in goals and strategies for improvements in the capacity of a service to deliver on the Government's children's services mission.
- the implementation and assessment of the effectiveness of these plans in the future, through a focus on them in future accreditation events.

Accreditation 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 quality improvement in each childcare service. That is it is either an event with a start and finish date, or it is a process which includes regular assessment against the accreditation standards and progress made towards quality improvement. The linking of accreditation and quality improvement ensures that the pressure for quality improvement continues beyond the accreditation event.

The system should support the development of a 'quality culture' in services. Quality should be an everyday focus and not simply be on the agenda at the time of accreditation. A required, systematic focus on quality improvement, the outcomes of which are in focus at the next accreditation event and in any 'spot check', will combine to support the development of a 'culture of quality' in services.

ECA believes that the requirement to develop a quality improvement plan, with goals and strategies, should be mandatory for all services. For high-performing services, this requirement supports a commitment to continuous improvement and reflective practice that underwrites an ongoing motivation to improve quality.

For services whose performance is poor or unacceptable, the linking of the accreditation event with a structured approach to quality improvement provides a strong base from which to leverage and measure improvement in those services.

ECA also believes that services whose performance is poor or unacceptable should continue to be referred to the appropriate PSC. They can then work with these services to develop and implement quality improvement plans which reflect the results of the accreditation event. The change to the current process would be that services are required to access this support and give evidence of having done this in the next stage.

A focus on ongoing quality improvement as part of the accreditation process:

- Demands from the childcare sector practice which emphasises critical reflection and ongoing self-evaluation, which are the key markers of a profession and acknowledged drivers toward improved practice.
- Gives impetus and support to high-performing services to maintain their commitment to excellence and challenges them to build on this through ongoing reflective practice and a culture of continuous self-evaluation. In short, a focus through accreditation on continuing improvement supports the aspirations of these services to improve their practice.

- Provides impetus and support for poor or unacceptable services to develop an approach to their work which emphasises self-reflection, evaluation and change.
- Would give parents a greater confidence in the commitment of government to quality improvement in all services.

4.0 Accreditation – for what purpose?

A key issue that has had little or no discussion, but which is central to any response to the new draft standards, is what is the purpose of the new system?

ECA believes accreditation should be the mechanism that:

- accredits the service as being of sufficient standard to allow families using the services to receive CCB, i.e. meets basic standards of fitness for purpose.
- requires a systematic and planned approach to quality improvement in service delivery and outcomes for children, i.e. supports the development of a quality culture.

ECA believes it is important to limit the purpose of accreditation in this way because the regulations in all states and territories do not mandate staff:child ratios, group sizes or staff qualifications that reflect the research evidence about the structural conditions that are necessary to deliver high-quality child care. Hence it is not possible to assure the quality of the service.

Although this is regrettable, ECA believes that it would be even more regrettable, and potentially expose the Australian Government to risk, if the new system were to assure (guarantee) parents that the services, for which they received a fee subsidy from the Australian Government, were of high quality in a context where the evidence suggests it is not possible to do this.

A clear focus in the new system on both 'accreditation' and 'quality improvement' offers the potential for a much more realistic approach to improving the quality of services overall. The current system, which effectively says that high quality can be achieved irrespective of staff:child ratios, group size and qualified staff, masks and indeed undermines the need for a clear and supported focus on quality improvement. Indeed it takes the pressure off services which are performing poorly to 'lift their game'.

A change in the language from 'quality assurance' back to 'accreditation and quality improvement' has much greater resonance with the purpose of accreditation as set out previously of 'advancing the capacity of each child care service to deliver on the government's mission to provide high quality children's services for children and families.' It also signals a much more proactive, purposeful and systemic approach to quality improvement than was apparent under the previous QIAS system.

5.0 Regulations and accreditation standards overlap

As already indicated, ECA believes that standards for the purposes of accreditation have two main purposes:

- To protect children from harm.
- To improve the quality of service provision.

Many of the standards in the draft standards document do not relate to the actual care provided but form part of the fabric of a safe environment. Some of these standards also exist in regulation (both child care and more broadly) but are nevertheless proposed to be assessed as part of the accreditation process. Not to do so would be to assume that the regulations in all states and territories are the same—that all regulations covering an area are consistent and to a suitable standard and that all services comply with them. This is not the case.

Clearly it would be unhelpful to fully duplicate regulations but some overlap is inevitable and indeed necessary. It is important that officials or validators for the new accreditation system are not absolved of the responsibility to ensure that children are protected from harm in services where the cost to parents is underwritten by Government.

6.0 Validators

The current round of consultations does not ask for any comment on the qualifications and experience of validators. However, given ECA's position that the robustness of the system will depend on all of its elements, it is important to note ECA's early position on this issue.

ECA is of the very firm view that validators should have degrees in early childhood education, preferably be early childhood teachers and have significant experience in work with young children. Experience alone, even significant experience, does not equip people to make judgements about specialist practice in any field. The same is true of early childhood services.

Knowledge of how children grow and learn and the strategies and processes for working with them is a codified area of specialist knowledge which should underwrite any judgements of how services are working with young children. A system which fails to integrate this will necessarily be second rate.

7.0 The quality of the system will depend on the robustness of each of its elements

The quality of the system will depend on its elements including:

- clarity of purpose
- efficacy and robustness of the standards and indicators
- the quality, qualifications and experience of the validators
- the strength of the system's commitment to quality improvement.

Responding to the standards and indicators outside of any clear understanding of the other elements of the process is difficult. For instance, ECA might respond to the structure of the system, including the standards and indicators, differently if:

- Validators have no or low qualifications and experience.
- The purpose of the system is simply an accreditation event or focus guaranteeing quality i.e. quality assurance.
- There are no sanctions for services who fail accreditation one, two or three times.
- If the penalty for sanctions is borne by parents (loss of CCB) or borne by the service in terms of a fine.
- If no support is provided to poor or unacceptable services to improve their practice.

8.0 Conclusion

There is an opportunity in the development of the new Integrated Quality Assurance System to refocus these resources on a process which accredits services as reaching the standards necessary to deliver a childcare service at the same time as it requires all services to engage in a process of continuing improvement.

Such an approach reflects the reality of the conditions in which services are operating, without conceding the commitment of many services to meeting the challenges imposed by a commitment to quality improvement; and the clear imperative that poor and inadequate services must be required and supported to 'lift their game'.