



**Early Childhood  
Australia**  
A voice for young children

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# Children's Services Draft Two Consultation

## Feedback from Early Childhood Australia

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March 2013

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## About Early Childhood Australia

Early Childhood Australia (ECA) has been a voice for young children since 1938. We are the peak early childhood advocacy organisation, acting in the interests of young children, their families and those in the early childhood field.

ECA advocates to ensure quality, social justice and equity in all issues relating to the education and care of children from birth to eight years.

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## Introduction

The following submission outlines feedback on the Children's Services qualifications including Certificate III in Early Childhood Education and Care and Diploma of Early Childhood Education and Care on behalf of the members of Early Childhood Australia (ECA). The ECA membership is diverse encompassing providers of children's services across the spectrum of long day care, family day care, out-of-school hours care, rural/remote and mobile services and specialist service types; as well as Registered Training providers, Universities and individual professionals working across many of these settings. We appreciate the opportunity to provide feedback through the consultation process and recognise the importance of the training package in helping the service sector to deliver outcomes against the National Quality Framework through the provision of quality training and training for educators.

Our members particularly appreciated the opportunity to provide face-to-face feedback in the discussion workshops held nationally, but were disappointed that the Australian Capital Territory (ACT) was excluded from these consultations. It must also be noted that the consultation period has not been long enough for robust consultation and feedback to be collated effectively. The consultation period was held over the busiest time of year for children's services (December to February) and many have expressed frustration at not having the capacity to respond as effectively as they would have liked. Our own consultation has been limited to a small number of people rather than the full ECA membership due to the timeframes. In future we would like a minimum of six weeks to consult on an important project such as this.

Many of the changes included in the second draft are welcome, including the updating of language to better reflect terminology and the inclusion of cultural competency units. The delivery of programs can differ markedly between Registered Training Organisations (RTOs) hence it is particularly important to have a robust training package which provides directions and guidance to these organisations to ensure consistency for high quality training.

ECA recognises the importance of these qualifications, which will provide participants with the theories and skills to become suitably qualified individuals who will provide the future of Australia with the care and education they deserve.

## Current situation

There is now a breadth of evidence demonstrating that the care and education of young children (0–8 years) greatly impacts on their health, wellbeing and resilience throughout their lives. The early years are a time of rapid brain development and a secure, nurturing environment provides a solid base for learning. A child's learning and development is a critical foundation for success in schooling and later life<sup>1</sup>.

Attendance at early childhood education programs has been found to have beneficial effects on a child's readiness for future learning and their ability to make a successful transition to full-time schooling, particularly among disadvantaged children. Children who attend quality early childhood education programs show better performance and progress in their early school years in intellectual, cognitive and social domains<sup>2</sup>.

While a high-quality education program can provide an important head start for children as they make the transition to school, poor-quality education programs can provide no benefit or even cause children to perform less well<sup>3</sup>.

In Australia, the number of children participating in formal ECEC has been growing consistently over several years, demonstrated by a 20 per cent increase between June 2009 and June 2011<sup>4</sup>. The delivery of early childhood services now impacts over one million Australian children. It has never been more important to ensure that early childhood educators are appropriately skilled for their work.

The Council of Australian Governments (COAG) has responded to requirements from the early childhood sector to have improved standards through the introduction of the *National Quality Framework* (NQF). This framework sets a national benchmark for quality of education and care services across Australia. These Federal Government major reforms ushered in a new era of early childhood education and care that focuses on what is best for children, helping them to grow and learn.

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<sup>1</sup> Oberklaid, F, Director of the Centre for Community Child Health, Early childhood is everybody's business, *The Melbourne Review*, 2, November 2007.

<sup>2</sup> Barnett M, Clinical Child and Family Psychology Review, Economic disadvantage in complex family systems: expansion of family stress models, 2008, 11(3):145–61.

<sup>3</sup> Elliott, A, Australian Council for Educational Research Early childhood education: pathways to quality and equity for all children, Australian Education Review no. 50, Melbourne 2006.

<sup>4</sup> Standing Council on School Education and Early Childhood, Early Years Workforce Strategy 2012–2016, 2012, p 4.

The reforms have been a win-win. Families are much better informed about the quality of their child's early education and care, and children benefit in terms of social and intellectual growth, and learning from higher quality interactions with staff members. This is a long-term process that will benefit children, families and the Australian economy.

ECA strongly believes that the NQF will improve the standards of education and care, ensuring that all children receive the best start in life. ECA is working with the Department of Education, Employment, and Workplace Relations (DEEWR), Australian Children's Education and Care Quality Authority (ACECQA) and State/Territory Regulatory Authorities to achieve this. The primary challenges to the implementation of the *National Quality Framework* are in the domain of workforce issues. This includes having appropriately trained individuals in each workplace.

We are keen to see strong alignment between the National Quality Framework and the Children's Services training package in a way that is practical and effective.

## Entry requirements

The current model of entry requirements is widely accepted as an adequate conduit by both employers and educators. It is a clear outline which reflects the requirements of the new National Quality Framework and industrial awards, from Certificate III through to Diploma and on to University level qualifications.

It is particularly critical for employers that the Certificate III remains as an entry requirement to the Diploma for the following reasons:

- Having the Certificate III as an entry requirement ensures that employers can easily identify those employees entitled to be paid at a Certificate III level. If an employee is enrolled in the Diploma (without the Certificate III as a entry requirement), employers will not be able to ascertain at what point that individual is entitled to be paid at the Certificate III level under the present awards for the sector.
- If a current employee enrolls for the Diploma where the Certificate III is not an entry requirement, and chooses to not complete their studies, under the NQS it will be difficult for the employer to continue employing that individual if they are not meeting the requirements of the legislation. Employers are required to have employees who will assist them in meeting legislative requirements, and if the above circumstance occurred it could eventuate in unfair dismissal claims for employers who need to ensure they have appropriately qualified staff.

However, if the Certificate III is an entry requirement an employer will still have educators who meet minimum educator: child ratios while others are working towards the Diploma.

- In the interest of employees, it is important that the study they have completed is appropriately recognised and remunerated by their employer. If they have completed the equivalent units to a Certificate III level, but are not recognised for this during the Diploma, their pay may remain at the lower level. Industrially this could lead to some employees not being paid appropriately, but having the Certificate III would ensure that this does not take place.
- From January 2014, employers need to demonstrate to regulatory authorities that a minimum of 50 percent of educators in their service have obtained (or are actively working towards) at least an approved Diploma level education and care qualification. The remaining educators necessary to meet educator: child ratios are required to have obtained (or be actively working towards) at least an approved Certificate III level education and care qualification.

If the Certificate III is not clearly defined as a separate qualification, employers are concerned it will be complicated for them to demonstrate to the regulatory authority that they have the suitable number of staff who meet the requirements for holding the Certificate III and that they have the appropriate number of educators working towards the Diploma qualification.

- Having an exit point at Certificate III level is helpful, but if a participant withdraws from their studies prior to this they will only obtain Statements of Attainment which are not sufficient for employer's requirements. Not all employees are able to study at a Diploma level, but having the Certificate III as an entry requirement gives a foundation and work experience necessary for those who wish to continue studying for the Diploma. It also gives those with limited or no work experience the ability to gain knowledge and skills appropriate to work in the sector.
- In some communities, particularly rural and remote, the shortage of qualified educators can result in services not having any qualified educators on the premises. From 2014, having a Certificate III as an entry requirement will enable these services and their staff to outline that they can meet minimum educator: child ratios. If they have a staff member completing a Diploma, it could take a long time before they are fully qualified.

**Recommendation 1: Certificate III remains as an entry requirement for the Diploma.**

## GENERAL FEEDBACK:

### Core units

As the number of diploma units has been reduced from 33 to 27, ECA recommends that the following units are taken from the electives and added to the core units to meet job role responsibilities in relation to leading teams, which would also contribute to an appropriate leadership skills set:

- CHCORG428A – Reflect on and improve own professional practice
- CHCORG506E – Coordinate the work environment
- CHCORG627B – Provide mentoring support to colleagues

**Recommendation 2: Move three identified units from electives to core to meet job role responsibilities.**

### Foundation

Foundation skills need to be clarified for all units, as this is currently not clear.

**Recommendation 3: Clarify foundation skills for all units.**

### Elective units

ECA recommends that there be an additional elective unit at Diploma level relating to working with birth to three years, to build upon the knowledge gained at the Certificate III level, as educators at the Diploma level are the main providers of Early Childhood Education and Care for this age group.

**Recommendation 4: Additional elective unit specific to working with birth to three years be included in the Diploma.**

### Unit split

ECA recommends that at both the Certificate III and the Diploma level, the units which focus on fostering and enhancing the development and wellbeing of the child be split into two units: birth to six years and the other school age children, as the current birth to 12 age range is not appropriate for all workers. This would give a more tailored program to training package participants.

**Recommendation 5: Split the Foster and enhance units into birth to six years and six to 12 years.**

## Health and Safety

ECA suggests that asthma and anaphylaxis general information and skills for working with families affected should be included in the Ensure Health and Safety unit. However, we recommend that emergency response to asthma and anaphylaxis is included in the First Aid unit rather than in Ensure Health and Safety as this should be delivered by an appropriately qualified First Aid provider, and most Early Childhood Education and Care Registered Training Organisations (RTO's) do not have this qualification. It is recommended that you consult with Asthma Australia on this subject.

**Recommendation 6: Have general asthma and anaphylaxis information included in Ensure Health and Safety and emergency response included in the First Aid unit.**

## Theoretical

Theories about early childhood education, learning and development and contemporary ways of thinking need to be woven into all of the competencies within the Diploma. In particular, the units associated with play, planning, development and learning. This theoretical understanding is supported in the Early Years Learning Framework.

**Recommendation 7: Written philosophy is included in the planning competencies within the Diploma.**

## Practical work hours

ECA recommends that the practical hours required for each course are specified per core unit, adding up to the total of 120 hours which will give guidance to participants. ECA agrees with the practical hours being a minimum of 120 for the Certificate III and 240 for the Diploma.

**Recommendation 8: Practical hours are specified against core units.**

## Entry requirements

ECA suggests that if the Certificate III is not an entry level requirement for a Diploma that a higher literacy and numeracy level (such as Year 12 English and Mathematics, as oppose to the current Year 10 standard requirement) is compulsory for entry. Note that having the Certificate III as an entry requirement negates this issue, as raised above.

For students who English is a second language for, it is recommended that an average score of 6.5 on the International English Language Testing System (IELTS) or a Certificate IV in written and spoken English is attained as an entry requirement. This is to ensure that the individual has the skills and support to complete written assignments and clearly understand the material being delivered.



**Recommendation 9: Certificate III is an entry requirement for the Diploma.**

### **Exit options**

ECA has concerns around the exit options, as it is not clear to an employer when an individual has achieved a Certificate III when enrolled in the Diploma. This will impact on employers knowing when to pay someone appropriately, and also how the service will be assessed to ensure that they are meeting the new service qualification requirements. We have included this in more depth above under 'Entry Requirements'.

### **Recognised prior learning**

It is important that guidance information regarding Recognition of Prior Learning (RPL) is included in the companion volumes. The introduction of compulsory qualifications for all educators under the National Quality Framework is likely to result in a high volume of people seeking RPL. ECA is keen to ensure that RPL assessment is consistent and identifies and supports learning opportunities to foster improvements in practice and understanding. Additional guidance will help this to occur.

**Recommendation 10: Included RPL information in companion volumes.**

## Children's Services Qualification

### Course additions

The below table outlines ECA's recommendations and feedback on individual qualifications:

| Code and Title   | Comments/Actions  |
|--|---|
| CHC00001 Certificate III in Early Childhood Education and Care | In order to assess knowledge evidence, participants at this level need to be aware that there is a National Quality Framework, National Quality Standards, the Early Years Learning Framework and legislation. However, the inclusion of the full documents in each unit's requirements is burdensome, hard to assess and too broad. Participants need to know how to access these documents, and how to navigate through them to the appropriate parts for different areas of the unit. Our recommendation is that this could be taught in Legal and Ethical and the Learning Framework units rather than in every unit. |
| CHC00002 Certificate IV in School Age Education and Care       | As per above, in order to assess knowledge evidence, participants at these levels require a deeper knowledge of the National Quality Framework, National Quality Standards, the Early Years Learning Framework and legislation relevant to the age group they are working with. The inclusion of the full documents in each unit's requirements is burdensome, hard to assess and too broad. Participants need to know not only how to access these documents, but how to interpret and navigate through them to the appropriate parts for different areas.   |
| CHC00003 Diploma of Early Childhood Education and Care         |   |
| CHC00004 Diploma of School Age Education and Care              |   |

**Recommendation 11: Learners in each unit are aware of and able to interpret the National Quality Framework, National Quality Standards, Early Years Learning Framework and legislation.**

## Children's Services Specialisation Units feedback:

The below table outlines ECA's unit specific feedback which incorporates language changes as well as recommendations for additions to unit requirements:

| Code and Title   | Comments/Actions   |
|--|--|
| CHCECE001 Develop cultural competence and work with Australian Aboriginal and/or Torres Strait Islander cultures | ECA welcomes the addition of this unit. We suggest removing the first bullet, and moving sub-bullets to individual bullets. The first bullet should be reworded to read "Interacting in culturally appropriate ways with all families". Nowhere in the assessment conditions does it state that participants have to work with Aboriginal and Torres Strait Islander families to complete this unit.   |
| CHCECE002 Ensure the health and safety of children   | <p>ECA recommends the following changes to this unit:</p> <ul style="list-style-type: none"> <li>○ 2.2 Change 'with service guidelines' to 'consistent with current sector recommendations'</li> <li>○ 2.4 Remove 'within the scope of the service requirements for children's health and safety'</li> <li>○ 2.5 Change to 'share information about individual children with families'</li> <li>○ 4.3 Change to 'exchange information about supervision with colleagues to ensure adequate supervision at all times'</li> <li>○ 5.2 Remove 'and ensure that such items are clearly labelled at all times.'</li> <li>○ Remove 5.4 as this is covered earlier in 4.2 and 4.3</li> <li>○ 5.5 change 'talk with' to 'educate'</li> <li>○ 5.7 change to 'ensure toys and equipment are safe for children to use in the proposed area'</li> </ul> <p>Element 7 regarding asthma and anaphylaxis should be removed from this unit and covered in an appropriate First Aid unit.</p> |
| CHCECE003 Provide care for children  | <p>ECA recommends the following changes to this unit:</p> <ul style="list-style-type: none"> <li>○ 1.3 change to '...supervise and engage with children while eating and drinking'</li> <li>○ 2.6 change to 'encourage children's participation in planning and setting up experiences that reflect their interests' and then remove 3.6</li> <li>○ Remove 2.7 as it is not clear</li> <li>○ Remove 4.1</li> </ul>   |

| Code and Title   | Comments/Actions   |
|--|--|
|  | <ul style="list-style-type: none"> <li>○ 4.4 remove ‘...including those to minimise distress at separation of the family and child’</li> <li>○ 5.5 remove as covered in 4.4</li> </ul>   |
| CHCECE004 Promote and provide healthy food and drinks    | <ul style="list-style-type: none"> <li>○ Remove 1.3 as it is covered in 1.1, 1.2 and 1.6</li> <li>○ 3.2 change to ‘follow food safety procedures when handling food according to relevant health authorities’ guidelines’</li> <li>○ Performance evidence and knowledge evidence: change ‘food allergies’ to ‘food allergies and intolerances’</li> </ul>  |
| CHCECE005 Provide care for babies and toddlers           | <ul style="list-style-type: none"> <li>○ This unit is very health based/physical care. We recommend that it be changed to ‘Nurture and interact with babies and toddlers’</li> <li>○ This unit needs to be strengthened in relation to toddlers such as fostering independence and self help.</li> <li>○ Performance evidence and knowledge evidence needs strengthening for toddlers.</li> <li>○ The language needs to be consistent – it should be babies and toddlers, not infants.</li> <li>○ 1.6 change to ‘change nappies using appropriate hygiene practices consistent with relevant health authorities guidelines</li> <li>○ 2.1 change to ‘ensure babies are fed responsively, i.e. when they are hungry’</li> <li>○ 2.2 add ‘consistent with relevant health authorities guidelines’</li> <li>○ 2.6 change to ‘assist in the provision of supervision of babies and toddlers at all times’</li> <li>○ 3.4 change to ‘use a favourite toy of comfort item brought from home to provide familiarity and security’</li> <li>○ Assessment conditions – remove ‘adequate supplies of nappies and other’</li> </ul> |
| CHCECE006 Support behaviour of children and young people | <ul style="list-style-type: none"> <li>○ Remove ‘young people’ from the name of unit</li> <li>○ 1.2 change to ‘recognise any developmental challenges or mental health issues of a child that may have potential impact on their behaviour’</li> <li>○ 2.1 change to ‘within scope of own work role, establish expectations for behaviour in consultation with families, colleagues and external consultants’</li> <li>○ 3.1 change to ‘collect data and record observations to gain an understanding of the child’s behaviour’</li> <li>○ 3.2 change to ‘use data to demonstrate the frequency, intensity</li> </ul>  |

| Code and Title   | Comments/Actions  |
|--|---|
|  | <p>and duration of behaviours requiring support'</p> <ul style="list-style-type: none"> <li>○ 4.1 change to 'implement agreed strategies to support the child and their families'</li> <li>○ Remove 5.2 as covered in 4.1</li> <li>○ Remove 5.3 as it is unclear</li> <li>○ Throughout unit replace 'manage' with 'guide'; replace 'inappropriate behaviour' with 'behaviour requiring support'; replace 'additional needs' and 'disability' with 'developmental challenges'</li> </ul> |
| CHCECE007 Develop positive and respectful relationships with children        | ECA is supportive of this unit and believes that it does not require revision.  |
| CHCECE008 Work within a regulatory framework specific to children's services | ECA is supportive of this unit and believes that it does not require revision however we believe that it should be in the core units replacing the generic 'Work within a legal and ethical framework'.   |
| CHCECE009 Use an approved learning framework to guide practice               | ECA is supportive of this unit and believes that it does not require revision.  |
| CHCECE010 Support the holistic development of children                       | ECA recommends that this unit needs to be redesigned to better reflect holistic development. We agree with the changes made at the recent Sydney working party on 25 February 2013.   |
| CHCECE011 Provide experiences to support children's play and learning        | ECA is supportive of this unit and believes that it does not require revision.  |
| CHCECE012 Support children to connect with their world                       | <ul style="list-style-type: none"> <li>○ 2.2 change to 'recognise opportunities for changes to current practices and principles to ensure they are sustainable'</li> <li>○ ECA recommends that element 3 should be changed to 'Include others in implementing sustainable practices'</li> </ul>   |

| Code and Title   | Comments/Actions   |
|--|--|
|  | <ul style="list-style-type: none"> <li>○ Add 3.3 'Identify and encourage opportunities for community and families to be involved'</li> </ul>   |
| CHCECE013 Use information about children to inform practice                  | <ul style="list-style-type: none"> <li>○ 4.1 change to 'use information gathered about the child to inform the planning of programs that promote children's learning and development'</li> </ul>   |
| CHCECE014 Comply with family day care administration requirements            | We agree with the changes made at the recent Sydney working party on 25 February 2013.   |
| CHCECE015 Attend to daily functions in home based child care                 | We agree with the changes made at the recent Sydney working party on 25 February 2013.   |
| CHCECE016 Establish and maintain a safe and healthy environment for children | <ul style="list-style-type: none"> <li>○ Remove 'for children' from the name of unit</li> <li>○ 4.7 change to 'inform relevant public health authorities regarding infectious diseases as required'</li> <li>○ 6.4 change to 'ensure safe food practices are maintained'</li> <li>○ 6.5 change to 'ensure child safety for vehicles meet regulatory and legislative requirements'</li> <li>○ Remove 6.6</li> </ul> |
| CHCECE017 Foster the holistic development and wellbeing of the child         | This unit needs to be redesigned to better reflect holistic development. We agree with the changes made at the recent Sydney working party on 25 February 2013.  |
| CHCECE018 Nurture creativity in children                                     | We agree with the changes made at the recent Sydney working party on 25 February 2013.   |
| CHCECE019 Facilitate compliance in an education and care services            | <ul style="list-style-type: none"> <li>○ Remove 's' from 'services'</li> <li>○ Knowledge evidence should state 'an in depth knowledge of'</li> </ul>   |
| CHCECE020 Establish and implement plans                                      | <ul style="list-style-type: none"> <li>○ 2.3 remove '...according to their ability to do so'</li> </ul>  |

| Code and Title  | Comments/Actions   |
|---|--|
| for developing cooperative behaviour  |  |
| CHCECE021 Implement strategies for the inclusion of all children                            | ECA is supportive of this unit and believes that it does not require revision.   |
| CHCECE022 Promote children's agency   | We agree with the changes made at the recent Sydney working party on 25 February 2013.   |
| CHCECE023 Analyse information to inform learning  | We recommend that the name of the unit should be changed to 'Gather and use information to inform learning'  |
| CHCECE024 Design and implement the curriculum to foster children's learning and development | ECA is supportive of this unit and believes that it does not require revision.   |
| CHCECE025 Embed sustainable practices in service operations                                 | <ul style="list-style-type: none"> <li>○ 2.7 should change to 'Explore ethical dilemmas of waste disposal for sustainability with all stakeholders'</li> </ul> |
| CHCECE026 Work in partnership with families to provide appropriate care for children        | <ul style="list-style-type: none"> <li>○ Add 'education' to the title</li> <li>○ Refer to 'families' rather than parent/carer</li> </ul>                       |

#### Cross Sector Units

| Code and Title  | Comments/Actions   |
|---|--|
| CHCPRT001 Identify and respond to children and young people at risk | ECA is supportive of this unit and believes that it does not require revision. |

**Recommendation 12: The language and additions to individual units as outlined by ECA be considered for inclusion.**

## Conclusion

The ability of services to meet the needs of children and families through appropriately trained educators is of high importance to ECA and our members. We should never lose sight of the fact that the main aim of Early Childhood Education and Care is to prepare children to lead healthy, happy and productive lives—they are the future leaders of our society. This is achieved through ongoing improvements to training and qualifications, alongside quality standards. ECA can provide more detail on any of these recommendations and would welcome an opportunity to discuss this submission.

## Summary of recommendations

**Recommendation 1: Certificate III remains as an entry requirement for the Diploma.**

**Recommendation 2: Move three identified units from electives to core to meet job role responsibilities.**

**Recommendation 3: Clarify foundation skills for all units.**

**Recommendation 4: Additional elective unit specific to working with birth to three years be included in the Diploma.**

**Recommendation 5: Split the Foster and Enhance units into birth to six years, and six to 12 years.**

**Recommendation 6: Have general asthma and anaphylaxis information included in Ensure Health and Safety and emergency response included in the First Aid unit.**

**Recommendation 7: Written philosophy is included in the planning competencies within the Diploma.**

**Recommendation 8: Practical hours are specified against core units.**

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**Recommendation 10: Included RPL information in companion volumes.**

**Recommendation 11: Learners in each unit are aware of and able to interpret the National Quality Framework, National Quality Standards, Early Years Learning Framework and legislation.**

**Recommendation 12: The language and additions to individual units as outlined by ECA be considered for inclusion.**