



Early Childhood Australia
A voice for young children

**OUR
VISION:
EVERY
YOUNG
CHILD IS
THRIVING
AND
LEARNING**

Nanny Pilot Programme

Draft Guidelines

Early Childhood Australia

About us:

Early Childhood Australia (ECA) is the national peak early childhood advocacy organisation, acting in the interests of young children, their families and those in the early childhood sector. ECA advocates for quality in education and care as well as social justice and equity for children from birth to eight years. We have a federated structure with branches in each state and territory. In 2013, ECA celebrated 75 years of continuous service to the Australian community.



Nanny Pilot Programme- Draft Guidelines Consultation
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To whom it may concern

ECA welcomes the opportunity to provide input into the *Nanny Pilot Programme – Draft Guidelines*.

Early Childhood Australia (ECA) supports the Government's proposed Nanny Pilot in principle as an important opportunity to explore flexible response to family needs building on other trials of flexible practice undertaken with other service types.

However, ECA is concerned that Guidelines do not require nanny services to demonstrate, as far as possible, compliance with the National Quality Framework. While we understand that Education Council determines which services are in scope under the NQF, and this is not possible for within the pilot timelines, we believe that nanny services participating should be required to meet the same standards as other home based services under the Guidelines.

In particular, we recommend:

- Qualification standards applying to both educators and coordination unit staff
- The delivery of an educational program under the Early Years Learning Framework or School Age Learning Framework

Last year Early Childhood Australia published the Early Childhood Flexibility Practices and Patterns Report (ECA, 2014). The Report found that family day care and in-home care services are more likely to cater for shift workers and parents with changing work hours. The Report suggests that these care types might provide particular opportunities to improve early childhood flexibility in the future. The Report also found that children's interests are a paramount consideration when considering flexible practice. The stability, quality, and intensity of early childhood services are all relevant when considering children's interests.

Putting children's interests into practice may include considering children's rights and identifying and treating risks associated with flexible approaches. It is our view that the Guidelines do not currently reflect children's interests or associated risks because they do not ensure that nannies have the basic skills and qualifications to support children's development and wellbeing while in their care. Nannies working in home based services have less supervision than centre based services so it is critical that the Guidelines reflect these risks. Qualifications of staff are critical structural component underpinning high-quality early childhood programs with consequent improved learning, developmental and health outcomes for children (Kennedy, 2013). This is exactly why the National Quality Framework was introduced and why the Productivity Commission, in its Inquiry into Child Care and Early Childhood Learning, recommended that nannies hold a minimum Certificate III qualification.



Many of the organisations that are well placed to participate in the pilot will already meet quality standards and may prefer to employ people with qualifications for the role. It is not therefore an onerous requirement for DSS to ensure, as a risk treatment, that qualifications are required for all nannies employed or contracted by services applying under the Pilot Programme Guidelines.

Following the Royal Commission into Institutional Responses to Child Sexual Abuse: Report of Case Study No.2: YMCA NSW's response to the conduct of Jonathan Lord (Commonwealth of Australia, 2014) ECA remains concerned about the risks that this Government funded program presents to children and to Government in its current form. To improve the safety and wellbeing of children we recommend the following additional requirements in the Guidelines:

- Nanny services demonstrate that they are meeting the Education and Care Services National Law and Regulations as an approved Family Day Care provider operating in the parent's home
- Qualifications are considered as a threshold requirement before nannies can be considered competent and safe to work with children.
- Nannies have undertaken child protection training (before commencement)
- Recruitment procedures include the requirement of a police check in addition to working with children/vulnerable people checks (which do not provide any information on the nannies background to their employer)
- Recruitment procedures include checking two references from professional referees with direct knowledge of the applicant's suitability to work with children, with the following recorded; the referee's details, the date of the check, the name of the person conducting the check, the referee's professional or personal relationship with the applicant, the referee's comments on: the applicant's ability to work with children, the applicant's suitability to work with children, any disciplinary action taken in response to any misconduct by the applicant in relation to children or young people and a summary of other observations made by the referee.
- Nanny services have induction procedures including that the nanny and coordinators are provided with and are conversant policies of the organisation and the National Law
- Nanny services demonstrate under the selection criteria their commitment to child protection
- All policies safety and wellbeing of children are provided to the DSS as part of their risk assessment process including policies on recruitment, induction and reports and allegations of child abuse.
- Nanny services have insurance covering service providers, nannies and families, details of which is provided to DSS
- Documentation is provided by nannies as evidence of the delivery of an educational program under an approved learning framework consistent with the National Law
- Periodic external checks are undertaken during the Pilot Programme to ensure that services are meeting requirements



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Sincerely

Samantha Page
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References

Commonwealth of Australia (2014) Royal Commission into Institutional Responses to Child Sexual Abuse: Report of Case Study No.2: YMCA NSW's response to the conduct of Jonathan Lord. Sydney: Commonwealth of Australia.

Early Childhood Australia (ECA) (2014) *Early Childhood Flexibility Practices and Patterns Report 2014* Canberra: ECA.

Kennedy, A. (2013). Evidence brief on staff to child ratios and educator qualification requirements of the National Quality Framework. Canberra: Early Childhood Australia.