

Review of the National Quality Framework

Submission from Early Childhood Australia

June 2019

About us

Early Childhood Australia (ECA) is a not-for-profit organisation that has been a voice for children since 1938. We have a federated structure with branches in every state and territory in Australia and our membership includes individual professionals, early childhood services and schools, as well as public, private and not-for-profit organisations that share a commitment to young children.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school.

Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight. ECA specifically acknowledges the rights of Aboriginal and Torres Strait Islander children and their families, and the past and current injustices and realities for them around Australia.

Find our more at: www.earlychildhoodaustralia.org.au

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1. Executive Summary

Early Childhood Australia (ECA) welcomes the opportunity to contribute to the review of the National Quality Framework (NQF).

ECA notes that the current review is limited in scope and focuses on closely defined issues. Many of the issues selected for consultation are matters concerning the day-to-day business of operating an early childhood education and care (ECEC) service. For this reason, ECA has chosen to limit its responses to the 'higher level' public policy issues affecting the sustainability of the NQF. However, members of ECA – including individual educators and ECEC service operators – are also providing their own perspectives and suggestions to the review. The ECA National Office thanks these ECA members for contributing to the review process.

2. Consultation Questions

Question 1. Are there issues not covered in this paper that significantly impact on the National Quality Framework being able to meet its objectives? What are those issues, and why are they significant?

ECA response: Yes.

ECA supports the NQF, in both its intent and its current structure. Based on improvements in service ratings against the National Quality Standard (NQS), the NQF has demonstrably increased the quality of ECEC services in Australia since its introduction.¹ However, the NQF will continue to operate effectively only if it is fully supported by all governments. This is not currently the case, due to the Australian Government's withdrawal of funding from the National Quality Agenda.

The NQF was established under the National Quality Agenda for Early Childhood Education and Care (NQA). The four elements of the National Quality Agenda (NQA) comprise:

- The NQF
- The NQS
- A coordinated, harmonised national regulation system
- The Australian Children's Education and Care Quality Authority (ACECQA).

¹ ACECQA. (2019). *NQS snapshot Q1 2019*. Sydney: Australian Children's Education and Care Quality Authority.



The NQA was established in 2009 by a National Partnership Agreement between the Commonwealth, states and territories as ‘a jointly governed, uniform national system, with oversight by the Ministerial Council’, to be funded by all governments.² In 2016, the parties to the National Partnership Agreement agreed that the Commonwealth would cover around 40 per cent of the costs of the NPA, with the states and territories to cover the remaining 60 per cent.³

Regrettably, the Australian Government effectively withdrew from the National Partnership Agreement on the NQA in 2018, when it stopped funding the NQA. In the 2018-19 Federal Budget, the Australian Government ended funding of the NQA NPA and replaced it with two years of direct funding for ACECQA. This was a significant blow to the national governance framework of ECEC in Australia, putting the unified national approach to quality regulation at risk.

ECA considers that the Australian Government’s withdrawal from the National Partnership Agreement on the NQA endangers the effectiveness and integrity of all elements of the NQA, including the NQF. ECA urges the parties to the NQA – the Commonwealth, states and territories – to address this issue as part of the NQF Review.

Scope of services regulated under the NQF

Question 2. Should service types that are currently out of scope of the National Law but which provide a substantially similar education and care service to those that are in scope be brought under the NQF? What should be considered if any of these services was to be included in future?

ECA response: Yes.

ECA supports all early education and care services and programs being in scope of the NQF. ECA believes that all governments must ensure that the early education provided to Australian children is of a consistently high quality through regulation, monitoring and continuous improvement. The National Quality Standard (NQS) is the only framework able to provide this certainty and consistency.

² Council of Australian Governments. (2009). *National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care 2015-16 to 2017-18*.

³ Council of Australian Governments. (2016). *National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care*. pp. 13-14.



As the *National Quality Framework Review Issues Paper* notes, many former Budget Based Funded (BBF) services are now required to meet the NQS in de facto form, due to subordinate legislation, grant agreements or funding programs that incorporate the NQS. ECA proposes that all of these services, plus mobile, occasional and in-home ECEC services, be brought within the scope of the NQS. Based on their experience in managing the initial rollout of the NQS, the Commonwealth, state and territory governments are well-placed to provide the necessary support to bring all remaining services under the NQS umbrella.

Sustainability of the NQF

Question 14. What fee models are appropriate for ensuring the continued operation of the NQF and improving outcomes for children and families by encouraging improvement in service quality?

ECA response:

As the *Issues Paper* points out, the Australian Government stopped contributing to the funding of state and territory regulation of the NQF in 2018. This withdrawal of full support for the National Quality Agenda is highly regrettable (as outlined in our response to Question 1), and has led to the current discussion of fees, with the clear implication that fees under the NQF will need to rise to cover the shortfall in Commonwealth funding. This situation should be addressed frankly by all jurisdictions as part of the current Review.

ECA notes the suggestion in the *Issues Paper* that the fee schedule for the NQF be changed to a partial cost-recovery basis. ECA emphasises that such a change would require careful consideration of the needs and interests of all parties, notably those of ECEC services.

ECA understands, and fully supports, the need for Regulatory Authorities to be well resourced, in order to administer the NQF to a high standard. On the other side of the equation, many ECEC services are highly sensitive to changes in costs, and any increase in administrative fees is therefore a matter requiring careful examination.



Qualification requirements

Question 17. Does recognising educators who are ‘actively working towards’ a qualification continue to be a practical approach to balance workforce needs and the NQF goals of service quality and child outcomes?

ECA response: Yes.

However, this must be carefully managed to ensure that educators in this category make reasonable progress towards completing their qualification rather than an open-ended approach. ECA would support the adoption of time limits for completion, perhaps with extension options for groups facing education disadvantage due to cultural, linguistic or geographic challenges.

In addition, the ‘actively working towards’ designation is insufficient to address workforce shortages in ECEC.

Research demonstrates that the education, qualifications and training of the workforce have the greatest impact on the quality of early education received by young children.⁴ The Australian early childhood education workforce has been undergoing rapid professionalisation over the last decade, with the percentage of qualified staff in the sector increasing. This process must continue as the ECEC sector continues to expand.

The Early Years Workforce Strategy was developed by the Standing Council on School Education and Early Childhood in 2012, but was allowed to lapse in 2016. ECA recommends the development of a new workforce strategy by all governments in Australia as a matter of priority. Critical issues to be addressed by the new workforce strategy include:

- workforce shortages, which affect the supply of early education services
- building on quality improvements for ECEC services
- training and professional development
- higher remuneration for educators.

Education and Care in OSHC

Question 19. How can the requirements of the NQF better reflect the unique operating context of OSHC?

⁴ Pascoe, S. and Brennan, D. (2017). *Lifting our Game*. Report of the Review to Achieve Educational Excellence in Australian Schools through Early Childhood Interventions. Melbourne: Victorian Government.



ECA response: ECA strongly supports the full and effective inclusion of outside school hours care (OSHC) services in the NQF. However, the inclusion of OSHC must always reflect the unique purpose and operating environments of this sector.

ECA commends the efforts of some state and territory governments to provide additional assistance to OSHC services to meet the requirements of the NQF and the NQS. In 2018-19, ECA has worked closely with the NSW Department of Education to develop the NSW OSHC Development Program (QDP). The QDP is designed to support quality improvement in OSHC services, and is available free of charge to educators in NSW. This type of investment in the quality of OSHC services is required across Australia.

It may also be useful to review *My Time, Our Place: Framework for School Age Care*, to ensure it continues to provide the best guidance to OSHC on providing high-quality services.

Value of quality ratings for families

Question 24. How can public knowledge and understanding about quality ratings of education and care services be improved?

ECA response: ECA notes the concerns raised in the *Issues Paper* about the low level of community understanding of the NQF, including the quality rating system. ECA considers that, until families of young children understand and appreciate the intent and outcomes of the NQF, the system can only be considered partially effective.

The families of children attending ECEC services are very important contributors to their children's learning, and they benefit from participating in informed partnerships with their children's educators. An understanding of the main concepts in the NQS is very useful for families in this regard. Families are also consumers, and need to understand NQS ratings in order to make informed decisions about which ECEC services to use.

ECA supports the suggestion in the *Issues Paper* that the rating terminology be reconsidered, with the goal of using language that accurately presents the quality of services, while also being easily comprehended by families.