



NSW Family Day Care Association Inc.

NSW FAMILY DAY CARE
ASSOCIATION INC.

ABN: 97 377 365 755

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National Quality Framework Inquiry

Please find attached a final submission from NSW Family Day Care Association to the National Quality Framework Inquiry.

Thank you for the opportunity to comment on the National Quality Framework.

Yours faithfully,

Anita Jovanovski
CEO

Kerrie Yates
Chair

About NSW Family Day Care Association

The NSW Family Day Care Association Inc. was established in 1976 to promote and support all aspects of Family Day Care in the community.

We do this by:

- Promoting the wellbeing of children and encouraging the discussion and exchange of ideas relating to children and their needs.
- Informing and supporting those involved in Family Day Care.
- Co-ordinating and acting on problems specific to Family Day Care in NSW.
- Preparing research, education, publicity and submissions relating to Family Day Care.
- Disseminating information relating to Family Day Care.
- Acting as an advisory body.
- Liaising with government and non-government organisations.

New South Wales Family Day Care Association provides professional support to members and the early childhood education and care sector in the provision of quality early childhood education and care through direct service provision, advocacy, recognised vocational and professional training, information dissemination, mentoring and collaborative networking opportunities.

NSW Family Day Care Association:

- Represents its members (70% of Family Day Care providers in NSW are members)
- Operates a Registered Training Organisation (PEAK Training) which provides the majority of nationally accredited training to NSW Family Day Care Educators.
- Operates an extensive professional support arm. As one of the consortium that operate the NSW Professional Support Co-ordinator (Children's Services Central) we are contracted to provide the majority of professional development to Family Day Care services in NSW.
- Sponsors NSW In-Home Childcare Services (NSWIHCS). This means we are both a peak organisation as well as a direct provider of In-Home Care.
- Advocates on behalf of Family Day Care and In-Home Care Services.

Executive Summary

1. NSW Family Day Care Association supports the National Quality Framework. We believe it delivers quality outcomes for children.

We especially support:

- The National Quality Standard;
- The Learning Frameworks (Early Years Learning Framework and Framework for School Aged Care);
- The increased qualifications requirements for home based educators

2. We believe there is one major element of the National Quality Framework that has not worked for NSW Family Day Care Services.

For NSW FDC services, the new Regulations brought in a reduction in the number of children below school age that a Family Day Care educator can care for from 2014. This has meant a loss of income for educators and has made it harder for services to recruit and retain educators. We believe that this was introduced without enough lead in time and without substantive evidence about the optimum number of children that can be cared for in a mixed age setting.

3. We believe that that there is a need to refine some elements of the assessment and ratings process to enable it to properly assess the quality of Family Day Care services.

NSW Family Day Care Services are doing well in the assessment and ratings process. With improvements to some elements of the system we believe that FDC services will do better and the process can be made more consistent and more workable for the unique situation of home based care.

4. We believe that the pursuit of quality education and care provision is a worthy aim. Supporting educators to deliver quality education and care costs money. That money must be available to enable the quality gains that the NQF has delivered to family day care to continue.

Any new system requires resourcing. Family Day Care providers have worked hard to assist educators to obtain the qualifications they need, implement the policies and procedures required to make them compliant with the new regulatory framework, implement the learning frameworks and work to meet the National Quality Standard. This is intensive work in the FDC setting where educators may be geographically disparate and may need one on one mentoring and support. This kind of resourcing is not cheap. NSW Family Day Care Association is concerned about the capacity for services to continue to support quality improvement to the same level after the changes to Community Support Payments in 2015. Quality costs.

1. NSWFDCA supports the National Quality Framework

NSW Family Day Care Association would like to place on the record our support for the National Quality Framework. We believe that the main aim of the NQF in increasing child care quality has been achieved. We believe the quality of Family Day Care Services has been improved since the start of the NQF and we believe this will continue to occur.

a. Our services are on track with qualification changes

NSW Family Day Care services are on track with qualification changes. By January 2014 our educators either have or are enrolled to obtain their Certificate III qualification. Family Day Care services and NSWFDCA have worked over the last few years to ensure that educators offering FDC in NSW had the appropriate qualifications. This has been achieved with many educators obtaining the qualification through RTOs like our own PEAK Training, which delivered the qualification specifically adapted to the Family Day Care setting. NSWFDCA also successfully sought funding through a variety of State and Federal Government programs to ensure we could subsidise the cost of the qualification as much as possible for educators as required. (For example funding was obtained through the Workplace English Language and Literacy (WELL) Program to ensure that educators with English as a Second language could receive specialist assistance to obtain the qualification.)

We support the requirement that FDC educators have an education and care qualification and we have witnessed the benefits that this has brought to FDC services.

b. Our services have addressed the main requirements of the NQF in the lead up to and since its implementation in 2012.

NSW Family Day Care services have addressed the policy and procedural changes necessary to meet the regulatory changes required as a consequence of the implementation of the new nationally consistent regulations from 2012. This has been done by concerted effort from Family Day Care providers and their educators, supported by consistent access to resources and professional development provided by the NSWFDCA and by the NSW Professional Support Co-ordinator, Children's Services Central. Meeting the new regulatory requirements was something that our services recognised would increase the quality of education and care provision we provided.

Our services have also ensured our educators are capable of delivering early education and care in accordance with the outcomes and principles of the appropriate learning framework (Early Years Learning Framework and My Time, Our Place). Although this involved an extensive professional development roll out, our services also embraced this in the understanding that it too would increase the quality of early education and care offered to children in our services.

Likewise our services have, for the most part, undertaken the changes to operation to enable them to meet the National Quality Standard. This has also involved a concerted and well planned roll out of resourcing and professional development both at educator and service level. NSW Family Day Care services' success at this has been recognised in the ratings our services have achieved against the National Quality Standard. 40.3% of all NSW FDC services that were rated as at November 2013 have been rated as meeting or Exceeding the National Quality Standard.

c. The streamlined regulatory/ assessment environment is working well for NSW FDC services

The streamlined regulatory /assessment environment has been working well for NSW FDC services, especially through the removal of the separation between regulation by the NSW State Government and Accreditation through the nationally administered quality improvement system. This streamlining has effectively reduced red tape for NSW FDC services.

d. There has been some implementation issues

NSW family day care services have faced a range of issues with the way the NQF changes have been implemented. These include:

- Lack of clarity as to whether advice should be sought from the state regulator or ACECQA
- Lack of time to adequately undergo professional development around new regulatory requirements
- Issues with applications for Certified Supervisors
- Lack of process clarity from our state regulator
- Lack of clear information from the state regulator to services and educators
- Lack of funding to support policy and procedural review processes
- Lack of consistency in assessment and rating processes
- Lack of understanding at some times by the state regulator of the Family Day Care context

e. We support the National Quality Standard

The National Quality Standard has worked well for family day care services. The existence of the standard has strengthened the road map for quality in Family Day Care. The Quality Areas, Standards and Elements work within the FDC context.

f. The learning frameworks have been embraced by educators

Family Day Care services have invested energy, time and professional development resources to implement the learning frameworks in our services. Our educators have embraced the frameworks and are using them to frame their implementation of programs for the children in their care.

Support for NQF

Despite the implementation issues, it is important to note that NSW Family Day Care Association supports the retention and continued roll out of the majority of the elements of the National Quality Framework for family day care services and supports the entire roll out for centre based early childhood services.

2. We believe there is one major element of the National Quality Framework that has not worked for NSW Family Day Care Services.

A considerable body of evidence is available about what constitutes quality for centre based care. This is particularly true in the areas of ratios and qualifications. This is the evidence that convinced COAG members to sign up to the changed ratios and qualification requirements of the National Quality Framework.

There is a dearth of evidence; however, about what constitutes quality education and care in Family Day Care settings – in the home-like settings with mixed aged groupings of Family Day Care. There is no research that states what the optimal ratios of children to educators are in our settings. In the absence of this research, the quality outcomes that are completely justifiable for centre based care in view of the research findings for these settings, have been extrapolated and imposed on Family Day Care services, without the evidence of whether these are required or are optimal.

NSW Family Day Care Association believes that it is essential that such research is funded and conducted. Public policy decisions should never be made on supposition and extrapolated findings. There are 120,000 children receiving care through Family Day Care in Australia¹. We owe it to these children to determine what drives quality care provision for these children rather than presuming we can apply quality determinants for centre based care, a form of care which is inherently different to family day care, to FDC settings.

Changes to numbers of children per educator make it harder to meet demand

Up until January 1 2014, a Family Day Care educator in NSW could care for up to 7 children under the age of 12, with a maximum of 5 children below school age. This changed as at January 1 to a maximum of 4 children not yet attending school.

This change, the only part of the National Quality Framework that the NSW Family Day Care Association does not agree with, has made it harder for NSW Family Day Care services to meet demand.

1. This change impacts on the number of children who can be cared for in Family Day Care in NSW.

When existing education and care services cannot meet existing demand, measures that reduce the number of children that can be cared for should not be proceeded with. Obviously reducing the percentage of children that can be cared for by each educator in NSW by 20% reduced the number of children that can be cared for by FDC overall in NSW by up to 20%. NSW Family Day Care Association estimates that this will mean a reduction of up to 5000 children receiving education and care in Family Day Care in NSW. Where will these children go?

2. This change impacts on educators' viability.

Educators have had to face one of two choices: Increase fees to make up the 20% loss in income or accept a reduction in income. Educators in Family Day Care have never been amongst Australia's high income earners. A 20% loss in income makes running a FDC business a much less attractive proposition and puts educators in high rent/mortgage regions into potentially unviable situations. We know from anecdotal evidence collected over years that when FDC fees rise, families reduce the number of days they use the service. This in turn reduces the income of the educator even further, unless they can find additional children to use those places.

¹ Child Care Early Learning in Summary March 2013, Department of Education
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3. This change will impact on the quality of early education and care provision.

Family Day Care in NSW has been remarkably successful at adapting to the other requirements of the National Quality Framework. NSW Family Day Care Association estimates that around 90% of Family Day Care educators have already obtained their Certificate III. Our services are consistently being rated well. As at November 2013 40.3% of NSW Family Day Care services were rated as meeting or exceeding the National Quality Standard. Most educators in NSW Family Day Care understand the NQF and its requirements including new policies and procedures and the skilful use of the new curriculum frameworks.

The reason this has been possible is primarily because of the professional development and support services have been able to roll out to their educators. This has meant that the quality of early education and care provision by FDC educators has risen over the period since the development of the NQF.

Obviously reducing the funding of FDC services in NSW by 20% at this crucial stage of the NQF rollout will make it impossible for this level of support and resourcing of educators to be maintained. Without this support, the quality of early education and provision in NSW FDC services will be impacted. This is obviously in strong contradiction to the major aim of the NQF to improve quality provision.

4. This change makes FDC less affordable.

Some FDC educators have needed to increase fees to remain viable in the face of the reduction of fee income from one child. Family Day Care has been an attractive form of care for many families because of its affordability. In 2013 the median weekly service cost of Family Day Care in NSW was \$327. This compared with the median cost of \$392 for long day care.² This can obviously not be maintained when educators are forced to increase their fees per hour per child to remain viable.

5. This change makes it harder for services to recruit educators

- a. Because it is a less attractive proposition because of the reduced potential income educators can make in Family Day Care.
- b. Because it reduces the capacity to recruit educators with children of their own.

6. This change seems hard to justify in the absence of research and when many FDC services are already exceeding the NQS with current child numbers.

NSW Family Day Care Association has consistently pointed out the inequity of making this change to the number of children a Family Day Care service can educate because it is not evidence based.

There has been no research completed about the optimal numbers of children a Family Day Care educator should care for in a mixed age home setting. We need to know whether there are educational and social advantages to children within FDC that justify the loss of places.

Changes to the ratios for centre based early education and care in the NQF is evidence based. There has been a plethora of evidence that proves unequivocally that better ratios in centre based education and care equates with higher quality care. There is no similar body of evidence,

² Table 3A.30 http://www.pc.gov.au/data/assets/pdf_file/0012/132303/rogs-2014-volumeb-chapter3.pdf
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or in fact any evidence, that this is also true in mixed age groupings within a family home setting. Research may prove that there is an optimal number of children to educator within Family Day Care, but until then why pre-emptively and arbitrarily set a number based on the much different education and care environment of a centre based setting?

3. We believe that that there is a need to refine some elements of the assessment and ratings process to enable it to properly assess the quality of Family Day Care services.

Family Day Care services in NSW that have been rated, have been well under the assessment and ratings process of the National Quality Framework. There are a number of elements of the assessment and ratings process that we believe when further refined will aid the capacity of FDC services to be rated consistently and in line with other service types.

Consistency between assessors

The newness of the NQF system and the assessment and ratings process has led to observable inconsistency in assessment visits and outcomes for services rated by different Assessment and Compliance Officers. This leads to both a weakening of faith in the assessment and ratings process and confusion as to what is best (and acceptable) practice against the NQF.

Assessment visits not tailored to the unique context of Family Day Care

Assessment visits conducted in NSW are often not undertaken with full appreciation of the Family Day Care context. When an assessor visits a centre based service observation of practice within that service is possible because a number of educators are at work in the one service. If an assessor wants to engage an educator to understand why they did something this is made possible by the existence of other educators who can provide back up within a room. Educators in Family Day Care work in isolation. When an assessor wants to discuss practices and policies with an FDC educator it is while they are actively supervising children and working unaided. It is unrealistic to expect educators with sole supervisory responsibility to be able to answer questions fully while actively caring for children.

Coupled with this concern are concerns about the length of time assessors are spending in individual educator's homes. A 4 hour visit in a home based environment is not on par with a day visit to a centre based service. The individual educator faces intense scrutiny over an extended period of time.

An inability to viably assess educators when a service has educators in more than one state or territory

At present an FDC service can have educators across more than one State or Territory. Regulators on the other hand operate in one. How can a service with educators in many states effectively be rated? NSW FDC has heard of some services telling educators they will not need to be part of an assessment and ratings visit because of their geographical location. This undermines the NQF.

A perceived focus on documentation

Family Day Care has always excelled at relationships with children. Relationships are nurtured in home based care. There is a perception amongst educators that have been through the assessment and ratings process that relationships are less important to assessors than documentation, especially documentation about children's learning. This perceived focus may exist because the majority of assessment and compliance officers have more experience with centre based care. An educator working with the same children on a daily basis is in a different situation in regards to documentation of children's learning than an educator programming for up to 50 children across a week.

The QIP template must be made more relevant for the FDC environment

Although use of the standard Quality Improvement Plan template is not a required part of the NQF, most Family Day Care services are using it. It is not well suited to the nature of Family Day Care with geographically dispersed educators. Educators are unable to be as involved in updating and assessing improvements as part of the QIP because the document is bulky and unable to be reproduced and updated easily and distributed to educators when milestones are reached.

Weighting of elements of the NQS

NSW Family Day Care Association believes that the NQS is an accurate roadmap to service quality. It is disheartening to services when an element that is perhaps not as vital as another can overturn a rating result without deeply affecting the health and well-being of children. Perhaps weighting some elements would mean that the elements most crucial to children's education and care would carry more weight in determining overall rating for each Quality Area.

4. We believe that the pursuit of quality education and care provision is a worthy aim. Supporting educators to deliver quality education and care costs money. That money must be available to enable the quality gains that the NQF has delivered to Family Day Care to continue.

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NSW services have only been able to achieve the ratings that they have because of the work that the providers have put into up-skilling and supporting educators to embed quality provision.

The loss and potential loss of:

- Community Support Funding
- Regional Travel Assistance Grants

will exacerbate the reduction of income services have already suffered through the reduction in the number of children that educators can care for.

It is this income that goes to Family Day Care services per se, as opposed to educators, that is used to mentor and support educators and provide for their professional development. In Family Day Care improvements to quality of service provision for children happens because of intensive one on one work with geographically dispersed educators. The provision of this resourcing and mentoring costs money.

NSW Family Day Care Association is concerned that the gains that the National Quality Framework has already delivered to children and families using Family Day Care services may be eroded by cuts to funding that may make the processes that enable ongoing quality improvement impossible to sustain.

The National Quality Framework delivers quality improvement to FDC services. Will this continue in the face of the removal of funds to services?