

2014 NQF Review – Consultation Regulation Impact Statement

Submission by Chinese Australian Services Society Ltd (CASS)

Chinese Australian Services Society (CASS) is a not-for-profit community organisation. Together with its subsidiary company, CASS Care Ltd which is a public benevolent institution, the organisation has been providing childcare services in Metropolitan Sydney over the last thirty years through its three long day care centres, one out of school hours care service and one family day care service.

This submission mainly focuses on some of the proposed options for changes to the National Quality Framework as outlined in the Regulation Impact Statement (RIS).

1. Proposal 1.3 – Reduction in documentation of child assessments or evaluations in OSHC services.

We strongly support the proposal 1.3B to ‘Amend Regulation 74 so that services that educate and care for children over preschool age must keep documentation about development of the program, rather than about individual children’s development’. We believe this is more realistic as children only attends OSHC services for a few hours a day and many have irregular and varying attendance pattern. Furthermore, OSHC services are designed to complement the school day, and the primary focus is on providing children with play and leisure opportunities which are meaningful (My Time, Our Place, page 5). It is thus more important and meaningful for services to provide and document the development of programs rather than documenting individual children’s development.

2. Proposal 1.7 – Ensuring ratings accurately reflect service quality

We strongly support the proposal 1.7B to ‘Remove the overall rating and rely on the seven quality area ratings to indicate service quality’. We believe the removal of the overall quality rating will give better reflection of the service’s performance in different areas, and also give parents a better picture of the service provided. At the moment, if one quality area is rated ‘working towards’ (which may just be because of only one quality element rated as ‘working towards’), the overall rating will become ‘working towards’ even though the service may achieve ‘exceeding quality standards’ in a number of quality areas. This is not a true reflection of the overall service quality of the service. Moreover, some parents may find certain quality areas more important than others. For example, they may find ‘relationships with children’ and ‘children’s health and safety’ more important, and if the service is rated well in these 2 areas, they do not mind if the service is not rated as well in the area of ‘sustainability’. The current overall rating can be very misleading and gives parents a wrong impression of the service even if the service is doing exceedingly well in a number of quality areas but not so well in just one area.

3. Proposal 1.8 Length of time between assessments

We support proposal 1.8C to ‘Remove the three year cycle policy and commit to re-rate all services at least once every five years, with more frequent re-rating of lower quality rated service’. We believe this is a more efficient and cost-effective way of managing services in terms of assessments.

4. Proposal 6.1 – National educator to child ratio for OSHC services

We support proposal 6.1B to ‘Introduce a national educator to child ratio for OSHC services’. We believe setting a ratio will give national consistency. We would recommend the ratio of 1 educator to 15 children which is in line with the national guidelines currently, and also the ratio requirement of the majority of the states currently. The ratio of 1:11 currently adopted only in the ACT is a bit too low and if adopted nationally, would result in higher operational cost for services in all the other states and in turn push up fees for families.

5. Proposal 7.3 – Mandating a ratio of FDC co-ordinators to educators

We do not support any of the proposals of introducing a ratio of 1:10 or 1:15 or 1:20 of FDC co-ordinators to educators. If a ratio needs to be set, it should not be co-ordinators to educators as some educators only work part-time while some only care for 2 to 3 children and some care for 4 children or more. The ratio should be set as co-ordinator to EFT (Effective Full-Time care which currently is 35 hours per week). We would suggest a ratio of 1 co-ordinator to 120 EFT. (This equates to roughly 1 co-ordinator to 20 full-time educators caring for 4 children a day for 10 hours a day and 5 days a week.) We need to bear in mind that the vast majority of FDC schemes will lose their operational support funding starting from July 2015. This has a huge impact on the fees that families will pay for the service. If the co-ordinator to educator/EFT ratio is set too low, the operational cost of the service will increase and in turn impacts on the childcare fees.

6. Proposal 7.4 – Mandating a minimum Certificate III for FDC educators

We strongly object to the proposal 7.4B to ‘Require all FDC educators to have an approved Certificate III (or equivalent) before being permitted to educate and care for children, rather than working towards the qualification, which is currently the requirement’. We support the current arrangement where a FDC educator can start providing care while working towards the qualification. Our experience in the last two years in working with our new FDC educators has shown that the actual day to day experience of providing care can complement the educators’ studies. Educators also benefit a lot from the support of the FDC scheme during the studies, especially for those educators coming from culturally and linguistically diverse backgrounds. Without the support of the FDC schemes, many would have terminated their studies before gaining the qualification. This would not be a wise move as many would be deterred from joining the childcare sector when there is huge need to recruit educators.

Apart from the proposals outlined in the RIS, CASS wishes to point out that it is important for the government to recognise that there is a fee implication for any raise of quality standards. Even though it is not included in the RIS, we understand there are calls from some people in the sector to further lower the educator-to-children ratio, something that we strongly object. While families welcome the raising of standards through better educator-to-child ratio and higher staff qualifications, both the families and the government need to be realistic. More staff means higher labour costs. Higher staff qualifications also mean higher labour costs. With the increase of operating costs due to increase of labour costs, a lot of childcare operators are struggling. The only way to keep the childcare service going while meeting the quality standards is to increase the fees. For

community organisations like CASS, we always have the families in mind but we also need to ensure the viability of the childcare services. While we always strive to provide quality services, we believe the requirements in the NQF should not exceed consumers' ability to pay.