



**Secretariat of National Aboriginal and Islander Child Care Inc.**

## ***A National Quality Framework for Early childhood Education and Care***

**SNAICC submission**

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## Overview

The provision of quality early learning programs for Aboriginal and Torres Strait Islander children has been a major policy and advocacy priority for SNAICC for many years. Whilst SNAICC's objectives focus broadly on the interests of Aboriginal and Torres Strait Islander children and families we have a particular focus on child welfare and protection and early childhood development. Aboriginal and Torres Strait Islander children are significantly over represented in child protection and under represented in early years (preschool and childcare) programs.

SNAICC believes that increased investment and better use of resources in the early years can and will improve outcomes for children and families and subsequently reduce levels of child neglect and maltreatment. As such we welcome the opportunity to provide some advice and input into the development of a national quality framework for early childhood education and care.

The development of the framework provides an opportunity to pursue a number of related reforms including workforce development, supporting communities to establish new services and assisting existing service to adapt and expand their service models, reforming practice within non-Indigenous specific services (mainstream services), creating a regulatory environment that supports rather than stymies innovation, integrating segmented early childhood programs (child care and preschool) into more seamless programs and fully recognising that child care for Aboriginal and Torres Strait Islander families often means something quite different from the types of child care typically sought by other Australian families.

The success of the framework will depend as much on what happens with these other reform priorities as on getting the structure and content of the framework itself right. The framework has to be enabling and support other reform priorities rather than being constraining and regulating practice back to a fixed and centralised view of quality. Unless we make progress on issues such as workforce development, expanding the availability of services and reforming service models the framework will merely be a new set of words on paper.

## Developing the framework within a broader Indigenous early years policy context

The framework, and related reforms, should be pursued with a view to ensuring the federal government achieves the important and ambitious targets it has established in relation closing the gap in Indigenous disadvantage.

Specifically in this context SNAICC refers to the targets outlined in *New Directions An equal start in life for Indigenous children* that established two new national objectives:

1. halving the gap in mortality rates between Indigenous and non Indigenous children under the age of five within a decade, and
2. halving the gap in reading, writing and numeracy achievement within a decade by introducing a comprehensive package focusing on Indigenous children's early years.

As detailed in that policy commitment Labor's plan has three component parts focusing on the critical years from birth to eight,

- Child and Maternal Health services;
- Early Development and parenting support; and
- Literacy and numeracy in the early years.

The development of the framework should be occurring within the context of the development and implementation of '*a comprehensive package focusing on Indigenous children's early years*'.

Whilst SNAICC accepts that the development of the framework is an important policy priority for the broader childcare and early years sectors its development is occurring largely in a vacuum from the perspective of Aboriginal and Torres Strait Islander services.

Specifically we refer to the still unclear status of the *National Indigenous Child Care Services Plan*, released by the previous government in September 2007. SNAICC has written to the government about that policy recommending it be re-developed to take account of the new government's broader policy agenda whilst retaining its scope and key focus areas. As yet the government has made no comment at all on the extent to which it supports any elements of the policy.

This has created an environment of considerable uncertainty for existing Aboriginal and Torres Strait Islander child care services. From their perspective whilst quality assurance, common learning frameworks, regulatory environments and accreditation are all important issues they are perhaps of less urgency than other matters such as service coverage, sustainability, flexibility of service models, training and workforce development.

The development of the framework would be greatly enhanced by the government setting out, after due discussions with SNAICC and other stakeholders, its other reform priorities relating to the development of Aboriginal and Torres Strait Islander childcare and early learning services. We again call for the *National Indigenous Child Care Services Plan* to be reviewed, updated and re-released.

### **Developing a quality framework to promote child development work outside formal service settings**

The most important and fundamental difference in the orientation of Aboriginal and Torres Strait Islander childcare services compared to non-Indigenous services stems from differing approaches to child rearing.

Aboriginal and Torres Strait Islander child rearing approaches place children within a broad family and community kinship network that acts together to raise children and meet their needs. The particular roles, aspects and tasks of caring for children are managed through the relationships between different members of the extended family.

Aboriginal and Torres Strait Islander childcare services care for children within this dynamic context and see their role as being part of the constant care of children. Their caring responsibility does not begin and end when the child is dropped off and picked up each day. Services, such as the Multifunctional Aboriginal Children's Services, were developed to help care for children at a community level and to care for all the children in their particular community - not just those children that may attend the service.

This outward looking orientation was originally supported within the funding model for MACS services. Services were provided with family support and community liaison workers, support for community education and cultural activities, capital grants for buses to transport families and children and support for health and welfare interventions. Children spend most of

their time outside the service setting. Most of the gains that can be made in improving the developmental environment within which children grow can be made by influencing what happens for children outside the service - not inside the service.

If the framework is to be useful and culturally relevant, (in terms of supporting Aboriginal and Torres Strait Islander approaches to child rearing), then it will have to look further than how services look after children when they are attending the service. It will need to address how services work at a community level, including with families who never attend childcare, to support the development of their children.

### **Objectives and key elements of a National Quality Framework (NQF) - acknowledging the particular purpose of Aboriginal and Torres Strait Islander childcare programs**

SNAICC first proposed the development of a National Indigenous Child Care Strategy in 2002 through the child care reference group (CCRG), an advisory body to the then Commonwealth Minister for Family and Community Services. The CCRG endorsed SNAICC's proposal and recommended that the Minister develop such a strategy in partnership with SNAICC. The Minister accepted this advice with government support for the development of a plan announced in the 2003 Federal Budget.

In 2003 as part of its submission to the *Commonwealth Childcare Broadband Program Re-development* SNAICC advocated that the particular orientation and purpose of childcare for Aboriginal and Torres Islander families be supported as a matter of government policy.

Specifically SNAICC recommended that:

*The objective of Commonwealth funding of child care for Indigenous families is to support family functioning within Indigenous communities by assisting Indigenous families to meet the cultural and developmental needs of their children.*

Recognising that the purpose and orientation of child care for Aboriginal and Torres Strait Islander families is broader than the generally accepted approach with non-Indigenous services would have significant implications for the quality framework.

SNAICC believes that the framework needs, within its objectives, to formally and specifically include the objective of child care as outlined above and use that objective as one of the starting points for the development of the framework. Failing to fully appreciate the orientation of Indigenous approaches to child care will limit the framework's impact to a very small number of Indigenous families – those attending formal child care.

The discussion paper on pages 11 and 12 outlines what the framework is intended to deliver. The points listed focus on the child care sector (ie, certainty for businesses about national regulatory requirements) rather than expressing outcomes in terms of responding to the needs of families and children. The objectives and intended outcomes from the NQF should be expressed in terms of improved developmental outcomes for children rather than as system oriented outcomes.

The goals for early childhood education and care developed by the COAG Early Childhood Development sub-group seem broadly appropriate to SNAICC however we believe these goals would be enhanced by adding the following;

*To support family functioning within Indigenous communities by assisting Indigenous families to meet the cultural and developmental needs of their children.*

## **Development of quality standards for Aboriginal and Torres Strait Islander services**

Whilst MACS and some other Indigenous services have been left outside the current accreditation system this does not mean that these services do not provide quality services or that they don't wish to be have the quality of their service provision scrutinised. In deed they would have long sought the opportunity to have the quality of their work with families and children, including their role in children's education, formally acknowledged and recognised.

SNAICC's position in relation to accreditation and quality assurance has been, and remains, that MACS and other specialist service providers for Aboriginal and Torres Strait Islander families should:

- be assisted by the federal government to define the quality standards that relate to their specialist area of service provision (provision for Aboriginal and Torres Strait Islander families),
- be supported through enhanced funding, support for staff training and long term professional development to meet and exceed those measurable quality standards, and
- operate within a broad national quality framework alongside other child care services.

The significant challenge now is to define quality standards for these specialist service providers for Aboriginal and Torres Strait Islander families within a broader national quality framework and support existing (and future) services to operate effectively within that framework.

It is important to distinguish between the overall quality of a service and the quality of a particular program that a service is delivering. The preferred approach of Aboriginal and Torres Strait Islander organizations has been to develop and run integrated, holistic or multifunctional services within which formal childcare is but one element.

Quality within the Aboriginal and Torres Strait Islander services tends to be seen as having the flexibility to assist families meet the needs of their children in a diversity ways. Quality is driven by the capacity of services to respond in multiple ways. This may include formal child care, health and nutrition support, access to specialist health interventions, immunisation, periodic health and developmental assessments, parenting advice and assistance, opportunities to participate in cultural activities, transition support for children entering school, respite support for families in stress and using and learning local Indigenous language(s).

The NQF will need to accommodate this by seeing formal child care programs (what happens when children are 'in the room' as only one element of a quality service.

Broadly there are a number of factors that SNAICC would identify as important to the quality of child care for Aboriginal and Torres Strait Islander families.

These would include:

- services having a local community base in terms of service governance, management and the cultural content of the programs children experience
- cultural content being locally derived and specific
- resource materials and processes for engaging children being inclusive and reflective of local Aboriginal and/or Torres Strait Islander community history, cultures and approaches to child rearing
- services being holistic and able to respond to the diversity of a families needs in relation to supporting them to raise their children
- services having the time and preparedness to reflect on, evaluate and change how they work with families and children (this is closely linked to services being community based and managed)
- staffing within the services including Aboriginal and Torres Strait Islander people in a diversity of roles with formal qualifications in fields including, children's services, child care, community development, community welfare and teaching
- maintaining strong relationships with local families and family networks and being able to call upon these networks to support children
- good physical assets and resources, (including the capacity to assist families with transport), and provide children with high levels of safe and developmentally appropriate physical activity
- program curriculum built around Aboriginal and Torres Strait Islander values, stories and approaches to child rearing delivering high achievements for children in terms of literacy and numeracy in their own language and English
- program formats recognising the high levels of independence often afforded to young children within Aboriginal and Torres Strait Islander child rearing approaches with opportunities for self directed activities, guided activities and play based activities
- language, literacy and numeracy programs supporting children to develop these skills in their first language and in a meaningful cultural context
- health and nutrition programs to support families in practical ways with the task of caring for children and ensure children's primary needs are met so they can benefit from participating in early years programs

### **Coverage of the National Quality Framework (NQF)**

As stated earlier SNAICC supports Aboriginal and Torres Strait Islander services being formally supported to have their quality service provision recognised and where there are gaps in quality to have this addressed. We support Aboriginal and Torres Strait Islander services being included within the NQF but not in a coercive fashion or within a timeline that may destabilise existing services.

Specifically SNAICC does not support the NQF only covering services that are funded through child care benefit. Quality assurance and accreditation systems should operate independently of the funding model used for particular service types. Budget based funding of Aboriginal and Torres Strait Islander services should not exclude these services from operating within the new quality framework.

Primarily our objection to the historical linkage between accreditation and child care benefit is that this ties the quality assurance system to a particular funding model of child care based on a premise of child care places and utilisation. This is itself based on a premise that the core role of the child care service is to provide quality care for those children enrolled in a 'child care place'.

In our view this approach has the funding model, (child care benefit/approved places/utilisation), drive the service model and the quality framework. It presumes that the role of the child care service will be limited to working only with those families that happen to have children enrolled in a child care place. This service model is not the optimal model for Aboriginal and Torres Strait Islander communities - urban, rural or remote.

SNAICC is aware that many Aboriginal and Torres Strait Islander services have resisted accreditation in the past. This is not because they don't support or wish to operate within a quality framework. Rather they sense that becoming accredited will mean an irreversible shift from a budget based model of funding to a CCB model which would further narrow and restrict their service provision and damage their relationships with families. Hence services have opted to stay outside the accreditation system.

SNAICC can envisage an effective NQF that operates on a modular basis with the flexibility to recognise the specialist expertise of Aboriginal and Torres Strait Islander services.

This is what they should be accredited as – specialist Aboriginal and Torres Strait Islander services. Currently the accreditation system only offers these services the choice of having their long day care program accredited. In effect Aboriginal and Torres Strait Islander services have remained outside the accreditation system because that system does not accommodate their needs or service model.

The new quality assurance and accreditation system needs the flexibility to identify and support quality service provision for a diverse range of Aboriginal and Torres Strait Islander services including:

- Multifunctional community based services that provide community level child care and have a community development orientation towards supporting families to care well for their children. The proposed Indigenous child and family hubs would be examples of this type of service. Many, perhaps even all, of these services would have some long day care centre based child care provision but this would be only one element of the child care and support they provide to families.
- Specialist enrolment based Aboriginal and Torres Strait Islander services that focus predominantly on provision of care for children enrolled in formal childcare arrangements. These types of services would include Long Day Care, JET crèches, Outside School Hours Care Programs and Innovative Indigenous child care services.
- Family and a parent participation models focused on mobile service provision, playgroups, facilitated playgroups and intensive support playgroups.

Current quality assurance and accreditation models have largely been developed for enrolment based child care programs. Aboriginal and Torres Strait Islander services have faced the choice of remaining outside the accreditation system and being isolated or moving into the system and compromising their holistic community level approach to meeting the child care needs of their community. Most have opted to stay outside the system.

The NQF also needs to support services to move along a continuum from the informal parent participation models such as playgroups to the larger multifunctional community wide service models. At present different Aboriginal and Torres Strait Islander are stuck with the service model they have been able to secure when new funding initiatives have flowed through the federal budget. The most recent federal budget provided funding for the establishment of 10 additional JET Creches in the Northern Territory. Whilst this additional funding is welcomed there is no clear pathway for these services to expand over time and add to their service provision or develop into a multifunctional service within which the JET crèche is but one component. A common core set of principles that goes across different service models would support this type of service expansion and diversification.

### **Transitions to a new system and creating an improved regulatory environment**

As most Aboriginal and Torres Strait Islander services have hitherto operated outside the child care accreditation system with some also operating without having to be licensed at the state and territory level there will be significant transition issues for many existing services.

It will be imperative that services are not adversely impacted upon as a result of this historical 'dual' system whereby Aboriginal and Torres Strait Islander services were not well supported to participate in a culturally relevant quality assurance system.

SNAICC has advocated for some years that the interests of services and children would be better served by a nationally consistent licensing framework that applied across all states and territories.

Such a national system, and the transitional arrangements, need to balance the desire to ensure that basic standards relating to facilities and infrastructure and qualified staffing levels are in place against the risk of losing service provision when the number of Aboriginal and Torres Strait Islander families accessing child care is already disproportionately low.

Reaching equivalent levels of service standard and ratios of qualified staff will require

- additional government investment to lift standards and facilities within some services
- the flexibility to recognise and formally acknowledge the skills and experience of 'unqualified staff' already working within services
- funding to support training and staff development to assist existing staff to obtain formal qualifications from Certificate II level through to degree level
- very significantly increased professional development and mentoring to ensure new quality provisions are embedded within services and programs

The role of professional development training providers and in particular the Indigenous Professional Support Units will be critical to the success of any national quality framework.

SNAICC is highly supportive of the IPSU model but believes the level of funding provided to the IPSU's to support and assist an increasing number and diversity of services is at present extremely inadequate. Current IPSU's are funded at a level such that their capacity to engage closely with staff within services, provide professional development training and then provide ongoing mentoring to sustain learning outcomes is extremely limited.



The IPSU's are ideally placed to support services much more closely and assist them to transition to a new quality framework. In order to do this the funding model for IPSU's has to recognise that this would require them to work intensively and long term with services in order to make sustainable improvements in program quality and service stability. This would require a very major expansion in the funding of IPSU's and SNAICC believes this should be a high priority within the implementation arrangements.

It would also be advisable for the government to establish a high level advisory committee to oversee the implementation of the NQF with Aboriginal and Torres Strait Islander services. Such a committee should have representation from SNAICC, direct representation from services, linkages to any new national accreditation body and to the federal Minister and include in its focus implementation of workforce development initiatives (see below).

### **Establishing a National Aboriginal and Torres Strait Islander Children's Services Workforce Development Plan**

SNAICC and a number of other organizations with an interest in Aboriginal and Torres Strait Islander early childhood have been advocating for the development a national workforce development plan. Workforce challenges in the child care and preschool sectors are well documented. These challenges are common to but more acute within Aboriginal and Torres Strait Islander services particularly services in rural and remote locations.

The government's commitment to universal preschool access for all four year olds by 2013 is highly commendable. Implementing that commitment presents significant workforce challenges and SNAICC is concerned that the 2013 timeline may be pursued at the cost of the quality of programs children experience and in ways that fail to maximise the local employment and economic benefit that accrues to Aboriginal and Torres Strait Islander people.

It is imperative that implementation of the national quality framework, early years learning framework and universal preschool commitment be supported by a National Aboriginal and Torres Strait Islander Children's Services Workforce Development Plan.

Detailed workforce planning should be carried out to assess the increases in child care and preschool service delivery that will be required to meet the commitment to universal preschool access. This needs to take account of the Aboriginal and Torres Strait Islander population projections, high birth rates, population age structure, current (low) levels of access to preschool and the additional staffing that will be required to support implementation of the commitment to universal access.

SNAICC's view is that government should not take a simplistic view of what is meant by a 'proper pre-school program'. Defining this only as a program led by a person with teaching qualifications will lead to negative unintended outcomes. From SNAICC's perspective a proper preschool program is not a program that is delivered by a non-Indigenous person brought in from outside a community or service with no local knowledge, cultural understandings or relationships with local families.

There is a danger that seeking to meet the universal access to preschool commitment by 2013 will see the emphasis move away from training local people to be employed in local services to the provision of financial incentives for people who already have formal qualifications to relocate and deliver programs. This would constitute a major policy failure and lost opportunity to provide education and jobs for local Aboriginal and Torres Strait Islander people.

Workforce planning needs to drop down to the local community level with disaggregated data that can inform funding decisions on the investment in the establishment of additional services or expansion of existing services.

Under such a plan all existing Aboriginal and Torres Strait Islander children's services should be assisted by:

- Providing on-the-job training opportunities to the existing Indigenous staff to train from Certificate 11 level through to degree level teaching qualifications
- Assessing the skills and knowledge of existing staff that have been working for many years in the children's services and have significant unrecognised qualifications
- Training options should include training on the job within the local service with services funded to provide back fill staff when other staff are participating in training
- Learning resources for students should be developed that reflect the cultural frameworks and local contexts within which services operate

## Summary

SNAICC strongly supports the development of a national quality framework that can replace the existing commonwealth accreditation system and state and territory licensing systems.

The development of such a system should be occurring within the context of a clear long term plan from the federal government to sustain and grow Aboriginal and Torres Strait Islander child care services. Such a plan should have a similar scope and identified key action areas as the 2007 National Indigenous Child Care Services Plan.

The development of the new system should include the development of quality standards that relate to the specialist role of Aboriginal and Torres Strait Islander services and in particular their community development approach to pursuing the well being of children. Central to this specialist role is the broader approach of supporting families to meet the developmental and cultural needs of their children. This approach underpins the preferred service model of Aboriginal and Torres Strait Islander communities and this service model should be encouraged – not stymied - by funding models and quality assurance frameworks.

SNAICC supports a modular system that provides a clear accreditation pathways for all Aboriginal and Torres Strait Islander services that does not coerce services into switching to a CCB based funding model.

The system should have the flexibility to encourage services to grow, diversify and expand in response to community need and avoid placing such regulatory burden on services that services are stymied in their efforts to support additional families. It should also allow non-Indigenous services to have the quality of their service provision for It Aboriginal and Torres Strait Islander services assessed and recognised.

Implementation of any new system should be carefully managed and have as its centre piece a National Aboriginal and Torres Strait Islander Children's Services workforce development plan. Implementation support should include a commitment from the federal government to assess the resource and infrastructure needs of Aboriginal and Torres Strait Islander services and to meet short falls in their infrastructure when measured against new quality standards. Enhanced levels of professional development and service support should be provided to assist services operate consistent with new quality standards with IPSU's funded to carry out this function.

A high level advisory committee to oversee the implementation of the NQF with Aboriginal and Torres Strait Islander services should be established with representation from SNAICC and direct representation from services.

The next phase in the development of the national quality framework will need to engage closely with Aboriginal and Torres Strait Islander services to define culturally appropriate measures of quality, service standards and the implementation issues that have to be addressed. SNAICC looks forward to participating in and supporting that process of engagement.