



20 September 2011

Ms Bernice Watson
Research Director
Industry, Education, Training and Industrial Relations Committee
Parliament House
George Street
BRISBANE QLD 4000

Dear Ms Watson

Thank you for seeking input from the early childhood sector regarding the Education and Care Services National Law Act that is currently before the Queensland parliament. C&K are pleased to provide you with the following submission.

At a meeting, earlier this year, of C&K's Board of Management, some specific concerns were raised by Board members in response to the exposure draft of the National Act and Regulations. The Board members accept that the National Regulations are crucial in helping states and territories move from the implementation of former education and care services laws to the new national law.

However, while C&K and its Board are very supportive of the current suite of national initiatives, concerns are held in relation to (1) certain nomenclature used in the national documents and (2) the role of volunteer parent management committees in the management of community kindergartens.

The key issues of concern to the Board and C&K management are:

1. There is no acknowledgement of Queensland's **community kindergartens** within the new National Quality Framework. This appears to undervalue the Queensland Government's Project 240 where the term 'Kindergarten' is focal. Queensland kindergartens are not categorised or defined within the document. Such an omission is misleading in relation to early childhood education and care provision for 3 to 4 year olds in Queensland.

It would seem that in a quest to standardize terms across all early childhood education and care centres the richness of differences in quality of qualified staff and educational programs that make up early childhood educational and care provision has been obscured. There is a responsibility to the children, parents and community that needs to be protected hence, we seek your assistance that this be rectified with particular reference to Queensland rather than the anomalous *kindergarten in some*

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jurisdictions within the new National Quality Framework (http://www.deewr.gov.au/Earlychildhood/Policy_Agenda/Pages/DraftNQFRegDocs.aspx).

We are also concerned about the use of the term *Supervisor* (see Section 4 Miscellaneous P.132) across all early childhood education and care settings, including by implication Queensland community kindergartens. The term supervisor denotes a person who manages and directs others and is a misnomer within educational contexts such as kindergartens or in settings that employ university qualified teachers.

While we would ideally like to see the term *supervisor* removed, if this proves impossible we would suggest that a supervisor within an educational environment without suitable educational qualifications is inappropriate. At minimum, any person deemed to be necessary to *supervise* or oversee should:

- hold the required qualification (not be enrolled and working towards)
- have a minimum 3 year tertiary early childhood qualification that includes an element of management and leadership. Australian Children's Education and Care Quality Authority (ACECQA) should take a leadership role in the accreditation of, research in early childhood education and care and scoping of early childhood courses
- have a qualification above those being supervised
- demonstrate supervisors skill set of leadership, management and early childhood knowledge
- be mandated to have annual professional development in the area of management, leadership and early childhood knowledge.

2. C&K believes that the volunteer parent management committee (VPMC) model, for management of community kindergartens, is not sustainable in the long term. The 2011 Productivity Commission's draft report, *Early Childhood Development Workforce*, outlines the difficulties that services managed by volunteer parent committees will face under the NQF and in providing support to their workforce. Some of the difficulties to be faced by VPMCs include:

- Increased legislative and regulatory requirements including
 - The introduction of the National Quality Framework
 - Financial compliance including ATO submissions, BAS, GST, payroll, superannuation and leave management
 - Workplace health and safety obligations
- Introduction of the Queensland Kindergarten Funding Scheme - with its significant increase in compliance and reporting obligations for services compared to the requirements of DECKAS
- Inherent business model defects – the current model requires the customers (volunteer parents) to also act as the business owners and operators. This is in contrast with the teacher, who is their employee, but in practice needs to act as the business operator who guides and manages the volunteer parent committee. The result is a model where the committee has a large degree of responsibility and accountability but little effective decision making power. This is due to volunteer parents having limited experience, and often no expertise, in the area of early childhood education or education management.

An important part of these national reforms, in our view, should be the reduction of the requirement and burden on volunteer parents for the management of community kindergartens. C&K believes that these critical management tasks should be relocated back to professional, not-for-profit organisations, who have the skills, knowledge, and expertise to provide consistent and responsible management for all kindergartens; that C&K believes is the best for children.

It's important to note that C&K continues to have a vision for parent involvement in early education and care services. The vision for this involvement includes parents taking an active interest and role in the education of their child as well as participating in parent advisory groups, friend and fundraising activities.

Recommendations

In response to the above issues it is recommended that:

- Specific reference be made to kindergartens in Queensland within the early childhood education settings within the new National Quality Framework (http://www.deewr.gov.au/Earlychildhood/Policy_Agenda/Pages/DraftNQFRegDocs.aspx)
- The term "*supervisor*", as a generic term across all Early Childhood Education and Care settings, be replaced by the use of terms that more accurately reflect the diversity of early childhood education and care settings. For example, the substitution of *teacher* for *supervisor* within Early Childhood Education and Care settings where University qualified specialist teachers are employed.
- Services that are operated by volunteer parent management committees should be strongly encouraged to join a professional, not-for-profit organisation, that has the skills, knowledge, and expertise to provide the calibre of consistent and responsible management required to operate a kindergarten.
- Where services choose not to join an organisation as described above, a cluster management model should be adopted whereby professional, not-for-profit organisations provide cluster managers who manage the operations of a group of geographically co-located services. Cluster managers would provide all administrative services, the management of all regulatory and quality matters, and the employment of staff.
- Where services remain managed by volunteer parent management committees, or become part of a cluster management program, all management committee members should be required to undertake an approved annual training program in the governance of not-for-profit associations. In terms of effective governance this should be considered equally as important as the need to hold a blue card.

Thank you for consideration of these important matters.

Yours sincerely



Barrie Elvish
chief executive officer