



23 September 2011

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Dear Mr Shine

Re: Inquiry into the Education and Care Services National Law (Queensland) Bill 2011

Thank you for the opportunity to make a submission.

As far as the Bill itself goes we do not have any issues with the intent of it.

- The single system of licensing makes sense. It is difficult, currently, working with State (OECEC) and Federal (NCAC) arenas as well as dealing with C&K and now ISQ as our CGB. Currently there are often requirements which are not very complementary between State and Federal requirements.

We are confident that ISQ will be very good at keeping schools updated on requirements relating to the new Framework. Having the same processes for Kindergarten and Outside School Hours Care will also be advantageous for schools who offer both.

- The new National Quality Assessment and Rating system to be administered by the states will be very good and with the work done by the new Australian Children's Education and Care Quality Authority this will ensure consistency of accreditation and assessment across the nation. We have had some interesting assessments in the past through NCAC with assessors looking at different "priority areas". The idea of "earned autonomy" based on ratings received is a good one. Fees paid for these assessments need to be reasonable and not cost prohibitive for centres- particularly the smaller community based ones. If a centre has been assessed as a high quality centre, these are the only centres that are able to be allowed to apply for the highest rating anyway, so by dropping the fees it will encourage centres to work towards and to apply for excellence.
- The issues relating to new standards of qualifications and child: adult ratios will be good for the industry overall. "Working towards" a qualification is not enough to warrant a person being able to work with children. Qualifications MUST be held in order to be allowed to be responsible for a group of children. A teacher is not allowed to teach in a school if he/she is only working towards a qualification. There should not be any difference when this concept is applied to a child care centre of Kindergarten.
- The idea of educational leader, certified and nominated Supervisor status positions which remain with the worker, not the centre, are attractive.
- The publication of non-compliance information on the My Child website was always going to occur and will keep everyone accountable as parents will access this to see the ratings given to centres as well as information on any infringements for non-compliance. We support the publication of such information as long as doing so is in the best interests of the children.

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- The idea in the National Framework of centres focusing on outcomes for children is positive and the idea of the Quality Improvement Plan a good one, allowing centres to strive for excellence.

Our concern focuses on the Framework itself and not the Bill to introduce the Framework.

- Timeframes. This new framework has not yet been finalised. It is due for release in mid-October to be implemented Jan 1 2012. This is very tight for centres and staff to get on top of the requirements in such a short time. There also needs to be money allocated with this introduction to ensure that the professional development needs of staff in centres is met.

Within the new National Quality Framework regulations, the proposed regulations are much clearer and less open to individual interpretation. This was a major issue with the previous Child Care Regulations.

In the draft proposed National Regulations, the following concerns were noted and it is hoped that these issues have been addressed. These were submitted to ECEC Quality at DEEWR in March 2011.

**Children leaving the service** - The regulation that states that children are able to leave the site on their own with parental permission or have older siblings pick younger siblings up with parental permission. It is understood that this can be at the discretion of the centre, but it is our belief that this sets a very dangerous precedent that should not be anywhere near a children's care facility.

**Reviews** - What constitutes a "regular review of policy"? It is not enough to be current and up-to-date. This clause needs to be clarified.

**Transitional arrangements** -The area of transition for existing centres is quite sketchy and needs more details as to how this will occur.

**Recognition of prior status** - Centres have put a huge amount of work into their previous NCAC and licensing applications and to remove this and award a "base" or "operating" level until they are able to be re-assessed is not satisfactory. If the plan is to list those centres as "operating", with "yet to be assessed" as an addendum on the "My child" website, why is it not possible to put their previous NCAC rating as the addendum? This would provide the centres with the recognition that they have earned, as well as providing parents with a more up-to-date and informed review of where the centre is at.

I trust that these comments have been helpful. I regret that I will be unavailable on the day of the hearing as I will be travelling to Rockhampton on school business.

Yours sincerely



(Mrs) Wendy Ashley-Cooper  
Head of School