



SOCIAL JUSTICE IN EARLY CHILDHOOD
Proposed Model for Accreditation System for
Long Day Care Centres
Outline of Standard and Innovative Practice
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Social Justice In Early Childhood is a not for profit politically activist organisation for social justice issues pertaining to the lives of children. Its members consist of early childhood teachers and educators, consultants, academics, researchers, managers, community people and anyone interested in the rights of children. Although the group is Sydney based, there are both national and international members. SJIEC runs an annual conference, "Throwing the Baby out With the Bathwater", as well as affordable professional development, and political campaigns. SJIEC is an independent activist organisation and is not specifically aligned with any political party.

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1. INTRODUCTION

This document outlines our response to imminent changes to the Quality Assurance system applicable to Long Day Care. Whilst our response focuses on the issues faced by Long Day Care, SJIEC Members have agreed that an Integrated system would not be conducive to any or all of the provisions that it intends to measure. So, from the perspective of Long Day Care this submission addresses the Draft Framework and Standards.

We wish to express our concern over the short time frame with which the consultation process has occurred. Further, we believe the consultation process adopted by the Government has been largely inequitable to early childhood educators. It seems that the government was not inclined to fairly and rigorously seek the perspectives of early childhood educators until significant pressure from the sector was generated. We are quite concerned that although extended, only a minimal improvement was made with an extension to 12 weeks. We also argue that early childhood educators were not adequately represented on the National Advisory Group except the inclusion of Judy Radich, however we still see this as inadequate representation. Early childhood educators are a very marginalised and silenced group in decision making that concerns them. Continuing to ignore the voices of early childhood educators perpetuates the problems associated with recruitment and retention of staff in the field. Peak organisations should be encouraged to attend consultation sessions with a practitioner from their constituency.

Our response paper begins with our expressed opposition to the proposed Integrated Quality Assurance System. Next, we critique the proposed Draft Framework and Standards, from administrative and content perspectives. We then raise questions about the proposed Draft Standards, questions which we believe warrant consideration and clarification. Finally, we propose a series of recommendations for a new Quality Assurance System that we believe will have a greater capacity to support and promote quality in long day care. These recommendations include the development of an *Innovative Practice Strand*, which we outline following our recommendations.

2. OPPOSITION TO PROPOSED INTEGRATION OF QUALITY ASSURANCE SYSTEMS

We strongly oppose an Integrated Quality Assurance System for children's services. We are concerned that an Integrated System will compromise the quality of all children's services, and we urge FaCSIA to reassess the viability of integrating the three separate systems beyond the economic bottom line, and in the interest of early childhood education. We do not believe FaCSIA has provided any rationale as to how this integration will lead to improved quality standards and practices.

Recent research into state and territory child care regulations and the national childcare system of quality assurance (Fenech, Robertson, Sumsion, & Goodfellow, 2007; Tayler, Wills, Hayden, & Wilson, 2006) highlight a number of key concerns that collectively suggest that current regulatory accountabilities do not effectively promote or support high quality standards and practices in early childhood centres. Both studies pointed to the need for state regulations and the system of quality assurance to:

- Target **high** quality education and care, and not minimum standards or ‘lowest common denominator’ practices;
- Encompass structural standards – staff to child ratios, group sizes and teacher qualifications in particular – that current research identifies as being conducive to high quality education and care;
- Be streamlined, but not watered down, so as to minimize the current regulatory burden;
- Monitor the standards of all centres whilst acknowledging the excellence of high quality centres and giving greater professional autonomy to teachers in these centres; and
- Be embedded in a more integrated policy approach to quality early childhood education and care. Such an approach would, for example, actively address the shortage of early childhood teachers and high staff attrition rates which impede high quality.

The proposed Integrated system of Child Care Quality Assurance is not in keeping with any of these recommendations, nor does it address the concerns Press (2006) raises about the effectiveness of QIAS as an effective measurer and promoter of quality. More substantial reform to the current system of quality assurance than is proposed is required in order to instill greater confidence in the system and more effectively promote quality in early childhood centres. Currently, the minimum standard is not high enough to ensure that the lives of children are respected and they receive the education they deserve to participate in society, so, we await the details of satisfactory standards and sanctions.

In the proposed integrated system there is limited scope for teachers in Long Day Care to have their contribution to quality recognised. This is because the integrated system includes centres where qualified teachers are not required. We are concerned that as a consequence, standards may merely be geared to minimums that untrained staff can meet. That the proposed system no longer incorporates three tiers of quality – high, good and satisfactory – is indicative of what appears to be a shift to water down what is regarded as ‘quality’.

3. CRITIQUE OF THE ADMINISTRATION OF THE CURRENT DRAFT FRAMEWORK

There are a number of equity issues that need to be addressed in the administration processes of the proposed system. These include:

(a) During the implementation of the new system most centres are likely to request an *Evaluation Support Visit*. Findings from Fenech, Sumsion and Goodfellow (2006) showed that many teacher participants experienced accreditation as daunting and stressful. An Evaluation Support visit could serve to alleviate these anxieties. However, we consider that Evaluation Support visits should be available to all centres who would like additional support. This seems a worthwhile proposal given likely uncertainties about the new QA system. Moreover, early childhood centres experience high rates of staff turnover. Therefore, whilst a centre may be accredited, it may, since accreditation, have new, less experienced staff employed.

(b) We are **astonished** that there are no longer ‘levels’ of quality and that a blanket *Accredited* or *Not Accredited* status will be used in the new system. A Quality Improvement System should provide opportunities for centres to work towards standards of excellence. That children’s centres will no longer be able to strive for High Quality in the Accreditation process shows a reduction in the system’s capacity to support the early childhood field to continually improve quality. We **strongly recommend** that the Quality Assurance System continues to accredit centres on high, good and satisfactory levels of quality.

(c) Moderation is an important and critical aspect in the Accreditation process. This appears to have been removed from the new model. We recommend the government reconsiders the Moderation component as a vital aspect of the Accreditation system. Moderation ensures children’s centre data sets are used to establish an overall picture of quality that a centre provides. Moderation also involves an external expert with high early childhood qualifications to assess the data sets, determine an Accreditation status and advise the children’s centre about future improvement in quality. Without this aspect, data sets may be underutilized, centres will not have the benefit of an external audit process, and the integrity and accountability of the ‘*Assessment*’ process is seriously weakened.

3. CRITIQUE OF THE CONTENT OF THE CURRENT DRAFT STANDARDS

Philosophically, tertiary curricula in Universities are based on critical reflection and reflective practice. By integrating systems, it seems that the value of this learning, training and pedagogy in Long Day Care will be lost.

Four specific examples are:

- Minimal reference has been made about babies and toddlers which places our most vulnerable children at risk, as well as creating the potential for children to be further marginalized in education and curriculum opportunities, and for centres to be lax in providing quality for our youngest children;
- A lack of reference to inclusion and diversity which further perpetuates a white middle class underpinning of the Standards, which is a great risk to Aboriginal and Torres Strait Islander, CALD and Children with Special Rights and their families;
- Weak standards for the leadership and management of the day to day running of a children's centre and effectively includes, addresses and supports the rights and needs of children, families and educators; and
- An over domination of health principles compared to relationships and curriculum content and pedagogy. If the government wishes to 'improve' educational outcomes for children a critical decision must be made to balance the responsibilities of 'care' as well as 'education'.

Notwithstanding, the inclusion of open ended questions in the Draft Standards is a positive step, which contributes to improving early childhood practitioners' efforts in reflective practice. It is refreshing to see the Standards written in the form of questions rather than closed statements.

4. OUTSTANDING QUESTIONS REGARDING DRAFT FRAMEWORK AND STANDARDS

- When will the complete set of documentation be available for consultation?
- How do centres use the standards in the Service Report? (i.e. Does the *Service Report* resemble the Self Study? What does it contain? Will it have a framework?)
- In the event a licensee changes, how does this affect the Accredited status of the children's centre? (i.e. Will the children's centre go through Accreditation again?)
- Is the NCAC Assessor the equivalent of a Validator? If not, what is the difference?

- Is the *Assessment Report* the same or different to the Validation Report? It has been noted ‘discussion with staff’ will occur. How will this translate into practice? How will these discussions take place? Will there be a framework and what are the details?
- In the Quality Verification section, will Certification include qualifications such as an early childhood university education and early childhood TAFE training certificates?
- If a centre is not maintaining the standard on an Assessment Visit, will the Accreditation period be reduced? If so, by how much? How will this be administered?
- If Moderation no longer exists, how will the data sets be used? Who makes the final Accreditation Status decision?
- When will all this information be made public?

5. OUR RECOMMENDATIONS

- i. Each service type (LDC, FDC & OOSHC) should have unique Quality Assurance Systems that support quality practices;
- ii. Accredited status should include three levels of quality: satisfactory, good and high;
- iii. Moderation should continue to be part of the Accreditation process;
- iv. A new quality strand should be introduced to support centres that are innovative;
- v. The innovative strand is to be awarded only to centres that meet high quality in the Accreditation System and that show evidence of practice in the requirements for Innovative Practice (outlined below);
- vi. Initiatives for funding benefits should be made for Centres that participate in the Innovative Practice Strand

6. RATIONALE FOR INNOVATIVE PRACTICE STRAND

Findings from a recent doctoral study (Fenech, 2006) which, in part, investigated how early childhood teachers perceive QIAS to impact on quality in LDC in NSW, support the inclusion of an *Innovative Practice* strand. Participants in the study highlighted the potential detrimental impact on quality QIAS was perceived to have on centres where staff were committed to

providing high quality care. With its perceived technical, prescriptive, and ‘one-size-fits’ all’ approach to quality, these teachers did not consider that QIAS supported or recognised innovative quality practices. Moreover, QIAS was perceived to constrain teachers’ professional autonomy and decision-making. Interviews with experienced teachers regarded as leaders in the field by their peers, revealed a deep sense of grief, dissatisfaction, and frustration with the current system of accreditation. These teachers perceived that QIAS today targets the “lowest common denominator”. As such, their initial hopes that the system would facilitate and acknowledge centres demonstrating quality standards of excellence have been eroded.

The Innovative Strand provides incentives for Centres to be Centres of Excellence in the standards of care and education they provide rather than meeting the lowest common denominator. We concur with the authors of the Review of National Standards (Tayler et al., 2006) when they state "We argue for a consideration of a shift in thinking away from common minimum standards to aspirational standards in order to drive the field (in an on-going way) towards higher levels of quality" (p. 156). The Innovative Strand would therefore encompass the following initiatives:

- a) A Certificate that states whether a centre is accredited as either Standard or Innovative Practice;
- b) A funding incentive that encourages centres to strive for quality improvement (such as a % increase in CCB or an annual \$ lump sum); and
- c) A List of Centres of Excellence would be made publicly available, e.g., on NCAC's website.

7. OUTLINE OF ‘STANDARD PRACTICE’ REQUIRED FOR ACCREDITATION

In addition to participating in the Accreditation process, children’s centres should be required to keep a compulsory journal or e-journal. Children’s Centres with computer and internet access will be able to log-on to the NCAC website, enter a user-name and password, and submit quarterly reflections on their ongoing improvement and progress plan. Children’s Centres without internet access can type or write their quarterly reflections and post to NCAC. *NCAC Assessors* are provided with these reflections when undertaking a Spot-Visit or Re-Assessment. Children’s centres are encouraged to ensure their quarterly reflections are a result of input from all staff members. A minimum of four (4) journal entries per year is required, while additional entries are encouraged. These reflections then should form the basis of the service report, or what was previously known as the *Self Study*. This encourages centres to write as they go, rather than write their Service Report/Self Study just before they are due for Accreditation. It helps centres to pace their improvement, and makes reflective practice part of the everyday. We envisage it will help the centre to become more efficient at being continually critically reflective, and will

actually decrease the 'reporting' burden closer to Accreditation. This approach is far better suited to the concept of ongoing improvement rather than 'Accreditation and/or Assessment'.

As part of successful attainment of 'Standard Practice' in the Accreditation process in addition to journal entries, children's centres are also required to engage with contemporary professional literature to inform their planning, practice and evaluation. Evidence of the use of contemporary literature should be found in the children's centre's documentation. Children's centres should also show how contemporary literature has been used as basis for discussion and planning in staff meetings. Please refer to Appendix 1 for examples of references to contemporary professional literature.

8. OUTLINE OF 'INNOVATIVE PRACTICE' REQUIRED FOR ACCREDITATION

Although debated and discussed by many in the early childhood field, what constitutes high quality practice is difficult to define (Dahlberg, Moss, & Pence, 1999; Moss, 2001; Moss & Petrie, 2002). So, by deliberately creating opportunities for Centres who are operating in innovative ways to 'self nominate' practices for 'Assessment', this makes possible recognition of the work that many early childhood educators do that sits outside a 'one size fits all' Accreditation status. The *Innovative Practice* Strand involves children's centres meeting compulsory aspects in combination with at least three (3) optional aspects of innovation. These aspects are detailed below.

Compulsory Innovative Practice

Following the requirements of the *Standard Accreditation Strand*, children's centres participating in the *Innovative Practice Strand* are required to maintain a Journal or e-Journal, the frequency of entries required on a monthly basis. As previously explained, journal entries are sent to NCAC either by internet or post, and are compiled by NCAC and given to the *NCAC Assessor* for the next Spot Visit or Re-Assessment. In the *Innovative Practice* Strand, children's centres are able to nominate points of assessment in the journal or e-journal, which the *NCAC Assessor* is obliged to review on their next visitation to the children's centre.

The second compulsory aspect of the *Innovative Practice Strand* involves children's centres building relationships with *Critical Friends*. This requires the children's centre to establish links with universities, TAFE or professional people from peak organisations, to engage their expertise to evaluate, and/or give advice and support, and to listen and learn from the ideas and concerns of early childhood educators at the centre, on a regular basis. The notion of 'critical' friend is vital to this aspect, where the centre and critical friend engage in professional critical reflection around practice and work towards goals for improvement in an ongoing fashion. Centres should

be able to show evidence of communicating with their Critical Friend/s on a bi-monthly basis. Documentation of involvement with Critical Friend/s can be incorporated into the e-journal. Contemporary professional literature should be used to form the basis for discussions and communication. The last compulsory component of the Innovative Practice Strand requires all staff within the centre to participate in regular (3 times per year) professional development training or workshops, at least one of which is curriculum related.

Optional Aspects of Innovation

The following aspects are Optional Aspects of Innovation. The children's centre will be required to show evidence of at least three (3) of these aspects, in combination with the two Compulsory Aspects, in order to be considered for the *Innovative Practice Strand*. These are detailed below:

- Reconciliation with and learning from Indigenous Australians (mainstream/non indigenous centers): Centres show the methods by which learning between indigenous and non indigenous ideas about teaching and learning are being sought and implemented in the daily living in a children's centre
- Reconciliation with and learning from Indigenous Australians (Aboriginal Centres): Aboriginal and Torres Strait Islander Centres should have the scope to identify and practice teaching and learning that is culturally relevant and where possible be mentoring the non indigenous community.
- Research participation: Where possible, the centre is able to prove participation in research conducted by a recognised university, college or research institute that seeks to investigate curriculum; quality; cultural practices; teacher research; or educator research.
- Post Graduate Study/Research: At least one (1) staff member is involved in postgraduate study or postgraduate research, and uses this expertise to inform practice within the centre.
- Qualifications: 70% of staff have attained qualifications above and beyond regulatory requirements and/or are not otherwise recognised by Australian regulatory departments (e.g.: overseas qualifications in postgraduate certificate, Masters or PhD).
- Low turn over of staff: The centre is able to prove at least 20% of staff have worked at the children's centre for at least 5 years and 70% of staff have worked at the children's centre for at least 2 ½ yrs.
- Use of theories and theorists: The centre is able to show how staff use theories and theorists to rationalise and question educational thinking and contribute to early and

middle childhood education and care. Please refer to Appendix 2 for examples of theories and theorists.

- Innovative leadership and management techniques: the centre clearly demonstrates that innovation in leadership and management is reflected in a range of ways including, but not limited to, strength based practice, evidence based leadership, mentoring and coaching and democratic principles of leadership; and the centre utilizes professional literature and contemporary theory to extend and reflect approaches to leadership and management.

9. THE WAY FORWARD

Due to the lack of adequate representation by qualified practitioners working with children in the development and creating of a new set of Standards, FaCSIA could take the lead and initiate a group of early childhood teachers, researchers and other professionals, to improve, rewrite and reconstruct the Standards. We are interested and able to participate in such a group because we are committed to Quality Assurance as well as to our profession, children and families.

10. CONTACTING AUTHORS

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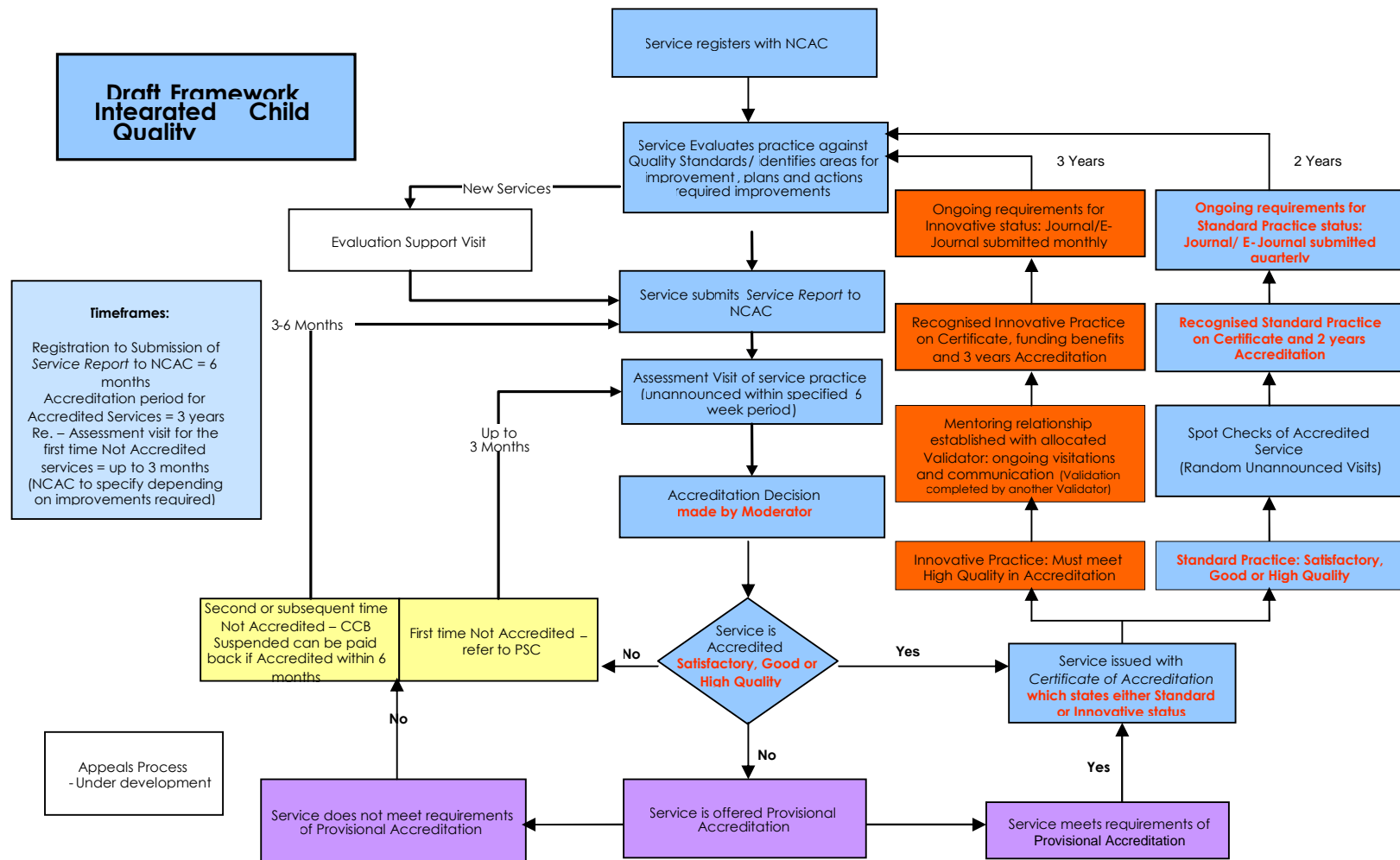
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APPENDIX 1: ADAPTED DRAFT CCQA FRAMEWORK

Draft CCQA Framework for Discussion – prepared by FaCSIA and NCAC 2007

Australian Government 2007, Adapted by Miriam Giugni, Kathryn Bown & Marianne Fenech 25th February 2007





APPENDIX 2: EXAMPLES OF CONTEMPORARY CRITICAL PROFESSIONAL LITERATURE

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APPENDIX 3: EXAMPLES OF THEORIES AND THEORISTS

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GLOSSARY

| Term | Instead of | Rationale |
|---|--|--|
| Early Childhood Education/ Early Childhood Centres | Childcare or Children's Services | Our work is not related to minding children. Feminist principles – women are not providing a service but are participating in a centre with families, children and the community. Consistent with language used in current research and contemporary literature, for example, the recent OECD (2006) Starting Strong II report |
| Early Childhood Profession | Childcare Sector | Early childhood teachers (having equal qualifications to those of primary school teachers) are constantly struggling to justify and promote their work with children as requiring a professional approach and capacity |
| Early Childhood Staff (Unqualified or Diploma) Early Childhood Teacher (University Qualified) Early Childhood Educators (encompassing all staff) | Childcare Workers <i>or</i> Childcarers | Using the term 'childcare' or 'childcarers' to describe the people who work in this field (i) does not appropriately or sufficiently describe the roles and responsibilities required for working with children (ii) perpetuates societal perceptions that early childhood staff are merely carers of children |
| Family day care provisions | Family day care businesses | The notion of 'business', for many in early childhood, is problematic because of its potential to lead to compromises in quality standards of education and care |
| Early Childhood Profession | Childcare Industry | As above |
| Interactions, Relationships, Experiences, Challenges | Child Development/ Age Appropriate Play | Further consultation about contemporary theories and approaches in early childhood education will clarify this request. |