



Australian Education Union

Submission to the

Early Childhood Quality Group on the National Quality Framework Regulations Exposure Draft Consultation

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The Australian Education Union represents more than 184,000 teachers and educators in the public primary, secondary, early childhood and TAFE sectors throughout Australia. We welcome the opportunity to table this submission to the national consultation on the proposed draft regulations for the National Early Childhood Education and Care Law.

Whilst the AEU supports the COAG agenda which acknowledges the critical importance of ECEC and the shared commitment to improvement in the quality of ECEC in Australia, we remain concerned to ensure that in achieving these desirable goals existing standards are not undermined, appropriate and consistent transition provisions are provided and that essential supports and resources are provided to ECEC staff to ensure this can occur. Introduction of increased expectations, no matter how desirable the outcome, without the necessary supports has the potential to work against the capacity of governments and stakeholders to deliver the ECEC reform agenda as the staff necessary to its delivery will leave the sector.

Our submission addresses these and other critical issues.

Initial exclusion of services

While the AEU recognises that there is a case for the exclusion of some services, the implications of the phrase “initially excluded” in the information paper (paragraph 42) are unclear. If some services are to be excluded as a temporary measure, then a timeline for the inclusion of each should be established. If there are cases for the permanent exclusion of some services then they should be clearly specified and the reasons for exclusion made explicit.

In that context the AEU would like to make the following comments regarding a number of services.

The AEU is concerned that school-based adjunct care models have not been mentioned in the discussion document and no provision has been made for them in the draft regulations. These services are programs in schools supporting young parents to complete their education, a successful example of which is the STEMM (Supporting Teenagers with Education, Mothering and Mentoring) program from Burnside High in Queensland which was recently featured on the television program 60 Minutes.¹

Our strong view is that it would be an unfortunate unintended consequence of the introduction of the National Quality Framework if schools supporting young parents to complete their education are adversely impacted by the introduction of the regulations. Indeed, it would be antithetical to the Australian Government’s Social Inclusion agenda and the stated support to such programs² if the highly successful adjunct care model was to be brought into the National Quality Framework. The model relies on building parenting skills into the school curriculum to ensure that these young students are supported not only to complete their education, but also to develop parenting skills, both of which impact positively on children’s development. The AEU strongly believes school-based adjunct care should be built into the regulations under the “services excluded” section.

¹ 60 Minutes, 1 April 2011. *Second Chance*. <http://sixtyminutes.ninemsn.com.au/article.aspx?id=8231538>

² See speeches and media release by Senator Jacinta Collins, Parliamentary Secretary for School Education and Workplace Relations, 25th and 26th October, 2010. <http://www.deewr.gov.au/Ministers/Collins/Media/Pages/default.aspx>

South Australia has funded occasional care with pre-school staff, and these should be included. Play centres in South Australia are staffed by an early childhood worker and funded by the Department of Education and Children's Services, and should also be included.

The situation is likely to vary concerning transition to school programs. Short term orientation programs of only a few days or less do not need to be covered. However where orientation programs progress to long-term transition programs which may, in some circumstances last up to two terms for regular timetabled attendance periods for children (as occurs in a limited number of circumstances in Victoria), such programs should be eventually included subject to the establishment of a realistic timeline.

The situation for disability services is also likely to vary. Where services contain a substantial number of children in the 0-8 age range they should be subject to a timeline for inclusion.

The AEU believes that to ensure every child has access to an early childhood education which best meets their needs and supports their participation in universal early childhood education and care programs, early intervention services must be brought under the provisions of the National Regulations. Application of the regulations to services for children with additional needs will ensure that like all other children engaged in early childhood education and care programs they will have the quality of their services specified. The AEU recognises that these services currently employ ECE teachers and other ECEC workers in addition to a variety of therapists and that this will require further work. However we are strongly of the view that such services should be included.

Mobile services in Victoria should be included as soon as possible. These services provide for children in isolated rural communities where fixed service facilities are not conducive to meeting the community need. However the legitimate incapacity of a service to meet the regulatory requirements for facilities has not to date prevented them from operating with compliance in relation to other quality factors (such as staffing and programs) and in the context of the service waivers provided for in the proposed regulations, it would appear there is no such impediment. The AEU believes that children attending these services should have the same protections and contributors to quality available to them as do other children across Australia.

Transfer of service approval

The AEU has some concern about the language used regarding intervention by the regulator during a transfer of approval, specifically that "a Regulator may intervene in a transfer of a Service Approval if it is concerned as to any of the following matters..." (paragraph 126). Due process and fairness must be central to the language used in the regulations and their supporting documentation. The work "concerned" in this context is unclear and subject to interpretation. The regulations and supporting documentation should state that a regulator should intervene if they "have evidence" regarding these matters.

Waivers, (temporary and service)

When waivers are granted, either temporary or service (ongoing), standards must be fully met in every other area. Waivers must be specifically targeted, and indicate what is and what is not being granted.

Paragraph 162 of the Information Paper provides the following example of a temporary waiver "...where a service was unable to meet the staffing requirements as prescribed but was actively recruiting, an application for a Temporary Waiver could be made to cover the period that the service may be without the required staff. This would mean that the service would not be required to comply with the relevant part of the National Quality Standard while the Temporary Waiver was in place. "

The AEU notes the inclusion of the important words "actively recruiting" We view this as critical to maintenance of the underpinning principles of the National Law and Regulations. We would be concerned if services were granted such waivers on the basis of their failure to recruit as a result of inadequate, unrealistic or disingenuous endeavours to do so. Unrealistic endeavours would, in our view, include endeavours to recruit qualified early childhood teachers for terms and conditions below the relevant State or Territory industrial benchmark terms and conditions. Simply put, temporary waivers should not be granted because an employer is not prepared to pay an appropriate wage nor provide appropriate conditions to support the teacher in their work. It must be clear that a waiver is granted for a good reason, not just cost cutting. A waiver should not allow providers to forgo their obligations. The process should be sufficiently rigorous to ensure the reasons for a waiver are genuine and the waiver is needed.

Given that temporary waivers are for a maximum of twelve months, but may be extended, a temporary waiver should include an action plan for full compliance by the conclusion of the initial waiver period. The process for management of applications for extensions of temporary waivers must be rigorous and any consideration of an extension of that waiver should be undertaken in light of the implementation or otherwise of that compliance plan.

Supervisor certificates and nominated supervisors

Given the requirement for every service to have certified and nominated supervisors, it is likely that possession of a supervisor certificate will effectively become a job requirement for ECE teachers and desirable for other staff. It is important that it be subject to due processes.

Whilst it is acknowledged that existing staff, such as the Primary Nominees and Nominees in the Victorian jurisdiction will be declared certified/nominated supervisors in the new system³ and be exempt from the payment of the \$30 fee associated with the attainment of the certificate, the AEU nevertheless has some concerns about the \$30 fee.

This will be on top of other registration requirements. The AEU believes that in the case of individuals, fees attached to the framework, such as supervisor certificates, should be paid by the employer (which in some instances will be the relevant department) and that the capacity to pay such fees should be vested in the employer. This matter is further discussed in the Fees section of this submission.

Whilst understanding the fee structure has been developed on a cost recovery basis, we are cognisant of the potential impact on attraction and retention of staff of the compounding costs of employment (registration, Working with Children Checks card or relevant check, police or criminal history checks, upgrades of qualifications etc).

³ Information supplied by Department of Education and Early Childhood Development (Victoria) officer at NQF briefing re National Laws and Regulations.

As indicated above, the AEU understands the imperative contained in the proposed regulations for a service to ensure that from the outset there is someone in day to day charge of a service and that when applying for Service Approval the National Law requires an approved provider to nominate a person with a Supervisor Certificate to be the nominated supervisor for the proposed service.

The question and answer at paragraph 211 of the Information Paper makes it absolutely clear that acceptance of the nomination as a nominated supervisor is in theory voluntary. It states that, “A person who holds a Supervisor Certificate is only in charge of a service if they have consented to act as the nominated supervisor.” Whilst the regulations introduce the notion of consent to holding the nominated supervisor role and its associated responsibilities and liabilities it would appear to the AEU that this could cause some difficulties.

In practice it is likely the principal will be the nominated supervisor in school-based ECEC centres and an ECE teacher in stand-alone kindergartens/preschools (such as those in Victoria, NSW and Queensland). However, there is a risk, perhaps more a likelihood, that in some jurisdictions and centres becoming a nominated supervisor may become a requirement for a position and people may be put under pressure to take such roles. The notion of genuine consent as proposed in the regulations raises the question of what happens if none of the eligible staff within a service consent to accepting the role? This is a potential response if the issues of workload and extent of authority are not adequately addressed by their employer.

If this were to be the case, an approved provider may seek to resolve their need to have a nominated supervisor by terminating employment of a staff member in order to appoint someone who is willing to consent. Given the varying employment structures within and across the States and Territories, this may be more a risk in some jurisdictions and services than others. Nevertheless it raises the question whether in these circumstances the consent given by an employee is genuine consent or consent given with the potential of termination of employment hanging over their head?

It is the view of the AEU that whilst staff are eager to facilitate improved quality, in the context of what is perceived as an increased role, responsibility and liability for the relevant staff member, it will be increasingly important that, beyond resolution of the workload and extent of authority issues, the notion of “consent” must be made clear, particularly as the role of nominated supervisor involves liability.

Whilst it may appear that the nature and scope of the responsibilities of educators and nominated supervisors under the Offences in the National Law (Attachment C of the information paper) are largely not additional to present responsibilities of teachers and supervisors, the weight of those responsibilities has been increased by the implementation of the various components of the ECEC reform agenda and the inter-connectedness of this with the Regulations. In particular this applies to the Early Years Learning Framework and the Assessment and Rating system.

Part 6, s168 of the National Law provides for offences relating to required programs. s168(2) lays the responsibility at the feet of the nominated supervisor to “ensure” that a program is delivered to all children being educated and cared for by the service is based on an approved learning framework; is delivered in a manner that accords with the approved learning framework; is based on the developmental needs, interests and experience of each child; and

is designed to take in to account the individual differences of each child. The penalty attached to this is \$4,000.

Division 3 of the proposed Regulations sits in the context of s168 of the National Law and deals with the Education program and practice. Regulation 82(b) specifies the responsibility of the nominated supervisor in relation to the provision of information to parents about their child; Regulations 86(b) specifies the responsibility of the nominated supervisor in relation to protection of children from inappropriate activities or treatment.

The capacity of the nominated supervisor to “ensure” these outcomes will be impacted by the time provided to them to interact with and observe the practice of other staff within the service and the authority and resources provided to them by the service provider to respond as appropriate.

The AEU believes the duty of care and liability of nominated supervisors should be explored more by the groups involved in drafting the regulations. The responsibilities of all parties (under the Offences in the National Law and otherwise) should be revisited and the liabilities of all parties made clear and appropriate.

The draft regulations allocate equivalent responsibility and liability to employers (approved providers) and their employees (nominated supervisor or a certified supervisor accepting day to day charge in the absence of the nominated supervisor) despite the fact that employees do not have the same authority as their employers to “ensure” those things which they are required to “ensure” under the National Law and Regulations.

This is a critical and significant difference. Regulations should ensure that liabilities should not be transferred to employees in situations when it should be the responsibility of the approved provider. The regulations need to ensure that processes of natural justice are paramount, and that people are not held responsible for matters beyond their control. An individual’s supervisory responsibility must be matched by real authority and authorities should not pursue an individual if they have acted in accordance with their responsibilities.

The role of a nominated supervisor must be to achieve and address real issues relating to safety and the welfare of children and staff, not merely the purchase of approval. Proper structures must be in place in regard to responsibilities and authority to ensure they are able to undertake this role.

There needs to be protection for employees who act in accordance with their responsibilities against the wishes or perceived wishes of the approved provider or employer, and may fear retribution for doing so.

Under the regulations relief teachers with supervising certificates may be hired for the day to take responsibility for that role in a centre. However, casual or relief teachers may not be in a position to influence some of the factors to which they would be held responsible for under the Offences in the National Law (Attachment C of the information paper). Their roles and responsibilities must by necessity be temporary in nature, and their duties and liabilities made explicitly clear.

Given that possession of a supervisor’s certificate is likely to become a requirement for a career in the sector, suspension of that supervisor’s certificate should be treated as a high

stakes process. The present proposal for what appears to be a written process only is in our view insufficient. Procedures relating to suspension or cancellation of a certificate must be accompanied by due processes with a proper hearing, advocacy and representation of parties, supported by an effective appeals process.

Supervisor certificates must be accompanied by provision of support structures for the ongoing conduct of the role and responsibilities, including professional development.

Requirement to facilitate children to attend a pre-school program – implications for fee structure

In addressing the Assessment and Ratings process the regulations provide that a High Quality/Advanced rating may only be given if the service provides a preschool program. This may either be directly or “by facilitating access to another preschool program at nearby premises by providing parents of those children with information about one or more preschool programs or supporting the child’s attendance at a preschool program.”

If a long day care centre does not directly provide a preschool program, yet facilitates provision through another program, this should have implications for fees paid by parents for their attendance in the balance of the services’ program and may also impact on funds received from the Commonwealth for that program. In these circumstances, this may have a financial impact for the service, as it may not be in a position to fill the place made available while the child is undertaking ECE.

The AEU recommends that this be investigated in more depth to determine what the appropriate fee arrangements and distribution of commonwealth funds should be in these circumstances.

The potential financial impacts for services of children leaving services for periods of time to attend a preschool program may impact upon the vigour with which a service “facilitates” access to a preschool program elsewhere. As access to the High Quality/Advanced rating is on the basis of facilitation rather than that parents choose to send their child to one of those programs (paragraph 235 of the Information Paper), the AEU believes it is critical that there is a requirement for “active” facilitation. In addition to avoidance of financial fee penalties (such as paying for the time the child is absent from the centre in order to hold the place on their return), active facilitation may include instigating mechanisms for the transport of children to and from the preschool program etc.

The Quality Ratings System, resources and workload

The Quality Rating System and the Quality Improvement Plan attached to it will entail considerable workload issues that have yet to be addressed. The reality is that the bulk of the workload will fall on staff and management. AEU members are already identifying workload issues related to it. The “excellent” rating in particular will have workloads attached to it. The Quality Ratings System will be counterproductive if the workload issue is not addressed, as requirements related to it will detract from the ability of teachers and centres to deliver quality education programs to children. There is also a danger that it will cause ECED workers to leave and make it more difficult to attract workers to the sector.

The full workload implications are not yet known, and the Early Childhood Development Working Group should make further investigations regarding these issues to provide a framework to address them. These should include recommendations regarding time allowances, face to face teaching workloads, rest and meal breaks and other factors. Specific arrangements should be a matter for states and territories to be determined through industrial agreements negotiated with unions. That said, regulatory authorities have a responsibility to ensure that conditions exist to facilitate the realistic implementation of the system, including to monitor the situation to ensure workload issues are addressed. They also have a role in ensuring that nominated supervisors are able to meet the responsibilities that fall to them as a consequence of their nomination.

The AEU has concerns as to how the rating may be perceived in the community, and whether perceptions will necessarily match the quality of education delivered by the centres and schools. There is potential for the rating system to create misunderstandings and damage relationships with parents. This includes perceptions concerning the “excellent” rating. Parents may expect an “excellent” rating, even though only a small percentage of centres and schools will achieve it.

It is vital that centres and staff be protected by information supplied to parents and the community by departments that explains the ratings system and counters misunderstanding and misuse of the ratings process. Such information must accompany any public display of ratings, whether online, on display at centres schools or elsewhere.

Applying for the “excellent” rating requires considerable resources, including the preparation of a submission and similar requirements. The AEU also has concerns about the fee attached to the “excellent” application process. Whilst it will be of little consequence to some centres, it could prove a considerable burden to others, as would the workload implications of producing the application. Centres serving disadvantaged cohorts or with fewer resources may have more difficulty in gaining higher ratings, despite providing comparable levels of service. For example Quality Area 4, Staffing arrangements, enhance children’s learning and development to ensure their safety and wellbeing. The draft assessment and rating instrument gives as the Excellent (Advanced) indicator the following statement:

Educator-to-child ratios (including qualified requirements) are maintained at all times and the use of additional educators and/or effective grouping of children and organisation of educators contributes to an advanced learning and care environment for children.⁴

Less affluent services may not have the same capacity as the more affluent ones to use “additional educators” and, should the proposed standards provide a waiver in respect of qualified staff requirements over the meal break (equal to the current exemption which operates in Victoria), services which are able to afford and access lunch time relief staff will be better able to meet this indicator.

This would have the effect of increasing the inequities between centres and producing an inequitable process. At present the implementation of the other aspects of the National Quality Framework is also making considerable demands on the time of ECE teachers, and this further highlights the importance of addressing the workload issues associated with the

⁴ DEEWR (2010) *Draft Assessment and Ratings Instrument. National Quality Standard for Early Childhood Education and School Age Care*. p. 19.

Quality Ratings System. It is the responsibility of governments to ensure there is capacity in funds they provide to meet the full requirements of the NQF.

The Quality Improvement Plan must be accompanied by professional development, meeting times and time allowances for its preparation.

The AEU also notes the discussion of the “excellent” rating in the discussion document uses the language of business rather than that of the sector (paragraph 271). Whilst largely symbolic, use of language appropriate to the sector would facilitate engagement with the sector and the ECE teaching profession and indicate that the rating is based on issues relevant to Early Childhood Education and Care.

Authorised officers

The draft regulations state that, “a site visit must be conducted by an authorised officer” (clause 61, p. 33). Such officers will have a range of powers, including to enter care service premises and to inspect and remove documentation (paragraph 502). It is unclear in the regulations as to who would constitute an authorised person. At least one of these authorised people should be a qualified ECE teacher, and this should be mandated in the regulations. Overall, qualifications of authorised officers need to be made clear.

The relationship between authorised officers and the assessors in relation to compliance issues also needs clarification.

Fee structures

As previously discussed, the AEU believes that in the case of individuals, fees attached to the framework, such as supervisor certificates, should be paid by the employer they are working for and that the capacity to pay such fees should be vested in the employer. That said, the situation may become more complicated for individuals qualified and looking for work for whom attainment of a supervisor certificate becomes an imperative. There should be provisions for compensatory arrangements once individuals have found employment and in the case of casuals.

Fees on approved providers are such that they could impose a considerable burden on some centres. As discussed, fees associated with the “excellent” rating in particular may make it harder for some centres to apply, leading to equity issues. The rating system can advantage centres with more resources and capabilities to produce an effective submission, disadvantaging centres that are equally excellent in the service they provide. It is the responsibility of governments to ensure there is capacity in funds they provide to meet these requirements.

Awareness of child protection laws

It is the duty of an approved provider under the regulations to ensure that the nominated supervisor, staff members and volunteers who work with children are advised of current child protection laws and their obligations under them (paragraph 339). The AEU supports this position. Government departments, approved providers and employers must provide resources, including time release, to allow employees to attend appropriate professional development regarding child protection laws and related matters.

Child to educator ratios

AEU policy supports staff student ratios of 2:20 for all preschool education programs for 4 year old children⁵, including at least one qualified early childhood teacher. The AEU believes this should form the basis of the ratio for this age group in the regulations, rather than the 1:11 ratio proposed at present. Furthermore, where the minimum staff student ratio comprises one qualified early childhood teacher and one assistant, group sizes for 4 year olds programs must be restricted to a maximum of 20.⁶

Group sizes and staff-children ratios must be adjusted in special settings and/or where children with special needs are included, to ensure that children's special educational needs are met. The Early Childhood Working Group should research this matter further with the view to producing a formula to include in the regulations regarding this matter.

Ratios will have implications for some providers. The ratios proposed in the discussion document will be an improvement in some jurisdictions, but not in others. In this regard the information paper states that, "Where there are jurisdiction-specific educator-to-child ratios, those must be maintained as a minimum" (paragraph 391). The AEU supports this position and believes provisions should be made in the final regulations to ensure this is the case.

Staff ratios during breaks

The discussion paper raises the issue of maintaining ratios during staff rest and meal breaks (paragraph 389).

The AEU believes that staff breaks are essential to the quality of the working life of ECED educators, and that provisions must be put in place to ensure that such breaks should be able to continue without producing a breach of the regulatory requirements. Groups involved in drafting the regulations should research this matter further with the view to producing requirements and processes in the regulations to enable this to take place.

Staffing requirements

The AEU is deeply concerned that the draft regulations contain no minimum staffing requirement. This could lead to safety implications in emergencies and may put teachers at risk in relation to their legal responsibilities as well as potentially leaving them vulnerable to allegations. In jurisdictions where services rely on parent fees and fundraising to supplement government funding for service provision, services with small enrolments or attendance numbers (such as isolated/rural services) or unfunded programs (such as three year old preschool programs in Victoria) may for financial reasons elect to run these programs with one staff member. In addition to the issues referred to above, single staffed programs would face OHS issues such as the safety of staff alone in often isolated facilities and lifting of often heavy equipment alone. Further, programs would be impacted by the reduction and alteration of staff; child interactions, capacity for diversity in program structure, range of activities, etc. Having no minimum staffing requirement runs contrary to the new national law which stipulates that a centre must ensure that all children are adequately supervised.

⁵ AEU (2007) Early Childhood Education Policy, clause 9.4.

⁶ Ibid, clause 9.6.

A number of jurisdictions presently have minimum staffing requirements, such as those in Victoria, Queensland and the Australian Capital Territory which stipulate that at least two staff must be on duty when children are present. The national regulations should include similar provisions.

Qualifications and training

The AEU is in broad agreement with the requirements regarding qualifications and training specified in the regulations and discussion document, including transitional arrangements made necessary by the rollout of universal provision and the National Quality Framework.

That said, the AEU believes that the requirement that services should be able to employ educators who are “working towards” a diploma level qualification (paragraph 413), rather than that they must possess a full qualification, should be regarded as a temporary measure during a transitional phase in the implementation of the regulations. The transitional period should be specified and a schedule for the requirement to be full possession of an appropriate qualification should be included in the regulations.

The AEU supports the approach taken to the introduction of the four year requirement for early childhood teachers with the provision of transition provisions for those holding three year teaching qualifications. Determining a set date after which a four year qualification is required, coupled with grand parenting provisions for three year qualified teachers as described at paragraph 589 of the information paper ensures that the many such qualified teachers are not lost to the sector. This is particularly important in states such as Victoria where between 50% and 60% of early childhood teachers are three year qualified. The AEU notes however that without a parallel approach being taken in relation to the implementation of universal access the impact of this sound transition provision within the regulations will be lost.

The requirement that an early childhood teacher be in attendance “some of the time” whenever the service is being provided to less than 25 preschool aged children is unclear, and the 20% of the time children are present specified in the discussion document is insufficient (paragraph 415). A more substantial time ratio should be determined and included in the regulations.

First aid requirements

The draft regulations provide a requirement that at least one or more staff member on duty at all times must hold a first aid certificate (paragraph 405 of the Information Paper). In some jurisdictions, for example Victoria, all staff are required to be trained in first aid. It is important that there be no retrograde steps. Where provisions are higher in jurisdictional requirements than the new regulations the former should be maintained.

Educational leader

The proposed regulations require the approved provider to designate a suitably qualified and experienced person to lead the implementation of the education program at the service. This is to ensure that educational programs are tailored to take into account the needs of each child and provide a stimulating and engaging program designed to enhance children’s learning and development (paragraph 448 information paper). Service delivery models vary across and

within states and territories. The staffing mix within services varies. The AEU understands that the regulations will not set out specific qualification requirements for the educational leader however the information paper suggests that it is likely to be the most highly qualified and/or experienced person in the service. In some services where staff often have the same or similar qualifications and there is a mix of full and part-time staff, selection may not be as clear.

As with the nominated supervisor, issues of extent of authority and the necessary supports (including time allocation) for the educational leader to undertake this valuable role will be critical to their capacity to undertake it and for the value of this initiative to be realised.

Mandatory reporting to the regulator when a staff member is charged with an “offence against the person”

The draft regulations provide that matters mandated to be reported to the Regulatory Authority include “if the approved provider becomes aware that a staff member at any service operated by the approved provider has been charged with an “offence against the person” (e.g. assault)” (paragraph 476).

The AEU believes that this does not constitute fair process, as it is based on reporting to the Regulatory Authority based on a charge rather than a conviction. Whilst the AEU recognises that the welfare of children does require action to be taken if there is evidence their welfare may be endangered, this would not be the case in all charges relating to offences of this kind. Only when the charge relates to an offence that would potentially impact upon the welfare of the children under the individual’s care should the reporting requirement be based on a charge rather than a conviction.

Space requirements

In specifying minimum space requirements (paragraph 365), it is important that there should be no retrograde steps. When ratios are higher in jurisdictional requirements than the new regulations the former should be maintained.

Professional Development and preparation for the NQF

The AEU is concerned about the fact that there has been little preparation provided by departments and employers to ECED educators about the NQF. Many ECEC educators are unaware of the full implications of the ECEC reform agenda and the impact it will have on their working lives. Considerably more attention must be put into communicating the changes and their implications to those working in the ECEC area. There is also a need for greater resourced professional development in this area.