



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

**SNAICC Submission to Australian Children's Education  
and Care Quality Authority**

**Draft Criteria for Excellent Rating**

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## **1) Introduction**

The Secretariat National Aboriginal and Islander Child Care (**'SNAICC'**) welcomes the opportunity to provide comments on the Australian Children's Education and Care Authority (**'ACECQA'**) Draft Criteria for Excellence Rating.

SNAICC was established as a non-governmental, not-for-profit organisation in 1981. It is the national peak body in Australia representing the interests of Aboriginal and Torres Strait Islander children and families. SNAICC has been a persistent voice and advocate in support of the protection, wellbeing and development of Aboriginal and Torres Strait Islander children and families, conducting research, providing policy advice and developing resources on issues around child protection and child development for three decades. Further information on SNAICC is available online at [www.snaicc.asn.au](http://www.snaicc.asn.au).

SNAICC welcomes the Draft Criteria and the possibilities it presents for services to demonstrate their ability to excel in providing improved outcomes for children. SNAICC also commends ACECQA for providing criteria that are comprehensive and yet also provide services with the flexibility to define what quality means within their unique context. In theory, SNAICC agrees with the approach of a mandatory Criterion 1, and a choice of then responding to three other Criteria out of a possible five. This will allow services to demonstrate the unique strengths, characteristics and values they possess that are enabling them to produce outcomes for children and to excel under the National Quality Standards.

SNAICC also supports the strong focus on relationships between services, families and communities that is emphasised through the six criteria. SNAICC experience confirms that this is key to achieving the best outcomes for children, in particular Aboriginal and Torres Strait Islander children.

## **2) Fee for application for 'Excellent' rating**

SNAICC is concerned that the application fee for an assessment for the 'excellent' rating of between \$200 - \$600 is prohibitive. Many services, particularly smaller services and/or those with limited resources, may be unable to apply for the rating because of the fee required. SNAICC recommends that services be able to apply for a fee waiver or subsidy based on their operational budget.

## **3) Cultural Competence under the NQS**

SNAICC's main concern is that cultural competence is not adequately defined in the National Quality Standards, and therefore it will be difficult to assess whether services meet the minimum requirements needed for cultural competence under the Draft Criteria for Excellence Rating (in particular under Criterion five).

SNAICC considers a comprehensive definition of cultural competence to be a prerequisite to the finalisation of these standards. This is consistent with the Early Childhood Development Workforce Productivity Report recommendations that:

- “ECEC services must meet cultural competence standards to receive National Quality Standard endorsement. The Australian Children’s Education and Care Quality Authority should:
  - consult with relevant stakeholders to develop clear and effective Indigenous cultural competence guidelines for ECEC services with Indigenous children
  - ensure National Quality Standard assessors are appropriately skilled to assess cultural competence.”<sup>1</sup>

The importance of cultural competence for early childhood services cannot be understated. The literature confirms that a wealth of anecdotal evidence demonstrates that a service that supports and nurtures cultural identity and language can potentially increase Aboriginal and Torres Strait Islander children and families’ access to and engagement with services, leading to improved education, health and wellbeing outcomes for Aboriginal and Torres Strait Islander children.<sup>2</sup> Strong cultural identity helps foster confidence, resilience and positive self-identity in children, which continue to contribute to improved wellbeing in later life.<sup>3</sup> For services to be able to achieve this, a clear and comprehensive definition of cultural competence for early childhood services needs to be articulated.

#### **4) Analysis of individual criterion**

##### **PART A**

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##### ***Draft Criterion 1***

##### ***Demonstrated excellent practice and sector leadership that leads to improved outcomes for children***

SNAICC’s first concern with the Draft Criterion 1 is that the language may limit the extent to which some services can engage with the criterion.

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<sup>1</sup> Productivity Commission. (2011). *Early Childhood Development Workforce Report*. Australian Government, 369

<sup>2</sup> Kitson, R. & Bowes, J. (2010). ‘Incorporating Indigenous ways of knowing in early education for Indigenous children’. *Australian Journal of Early Childhood*. Vol. 35 (4), 82; Sims. (2011). Early childhood and education services for Indigenous children prior to starting school’. Closing the Gap Clearinghouse, Australian Government. Resource sheet no. 7

<sup>3</sup> See Priest, K. (2005). *Preparing the Ground for Partnership - Exploring quality assurance for Aboriginal and Torres Strait Islander child care: a literature review and background paper*. Department of Family and Community services. Commonwealth of Australia, 9; Terrini, L. & McCallum, J. (2003). *Providing culturally competent care in early childhood services in New Zealand Part 1: Considering culture*. Ministry of Education. New Zealand Government; and Kitson, R. & Bowes, J. (2010). ‘Incorporating Indigenous ways of knowing in early education for Indigenous children’. *Australasian Journal of Early Childhood*. Vol. 35 (4), 84

Recommendation: that the language be made more accessible, and that alternatives or explanations be found for technical words such as 'scaffolding'.

A further concern is that services may be limited in the formats in which they are able to demonstrate their excellent practice and sector leadership. For many services, particularly those with lower numbers of experienced staff, formal reporting and documentation requirements are onerous responsibilities.<sup>4</sup> SNAICC believes that services need to be enabled and encouraged to demonstrate their work in a manner appropriate and relevant to their unique context, staff and capacities, for example, in multimedia, pictorial, oral or narrative forms.

Recommendation: that this criterion be amended to encompass different formats through which services can demonstrate their excellent practice and sector leadership, including multimedia, pictorial, oral and narrative forms.

Thirdly, SNAICC asserts that EYLF Outcome 1 needs to be better captured under this criterion. SNAICC recommends the inclusion of the following point:

- educators demonstrate deep understanding of each child, their family, and community contexts in planning for children's learning.

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### ***Draft Criterion 2***

#### ***Service is regarded as a lighthouse service through strong and effective relationships and engagement with their community and research participation***

SNAICC believes that the dual focus on engagement with community *and* research participation may limit some services in demonstrating excellence under this criteria – particularly those with limited resources and for whom linkages with research institutions are more challenging – for example remote services. SNAICC therefore recommends that the title of the criterion be amended to:

Service is regarded as a lighthouse service through strong and effective relationships and engagement with their community and with research participation

SNAICC is concerned that participation in research appears to be limited to academic research, and may therefore exclude some services, particular remote, under-resourced or smaller services, who do not have formal connections with research institutions. SNAICC recommends that the following point be amended to encompass:

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<sup>4</sup> See FaHCSIA. (2006). *Towards an Indigenous Child Care Services Plan*. Australian Government. Canberra, 13

- participates in research, including academic, experiential or participatory action research, conducted by universities or other research institutions, which have contributed to the broader knowledge base in the field.

Furthermore, as each child is different and contributes unique strengths to a service, and each community has a unique context, no one type of service fits all. For a service to be considered a 'lighthouse service' within the community, it must understand and reflect the community context in its service delivery, service development and environment.<sup>5</sup> This is in line with the EYLF Outcome 1: 'Children have a strong sense of identity' in that educators need to "demonstrate deep understanding of each child, their family, and community contexts in planning for children's learning."<sup>6</sup>

SNAICC therefore suggests that point 2 under Draft Criterion 2 be amended to include:

- based on a comprehensive understanding and appreciation of the local community context, implements innovative programs with children and families which enhance their community connections

For many Aboriginal and Torres Strait Islander children the transition to school presents unique challenges, requiring both children and parents to adapt to the demands and expectations of the mainstream school system and culture.<sup>7</sup> Given this, early childhood services need to incorporate programs to support Aboriginal and Torres Strait Islander children to smoothly transition to school, including catering for children's readiness for school, schools readiness to receive children, and family and community supports.<sup>8</sup> SNAICC therefore recommends that point 4 be amended to:

- develops relationships and strategies with local schools to support children and families smooth transition to school.

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### **Draft Criterion 3**

***Demonstrated commitment to the professional development of educators and other staff and to the development of the broader sector workforce.***

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<sup>5</sup> See Consideration 2, Kathryn Priest. (2005). *Preparing the Ground for Partnership - exploring quality assurance for Aboriginal and Torres Strait Islander child care: A literature review and background paper*. Department of Family and Community Services. Commonwealth of Australia, xx

<sup>6</sup> EYLF, p23

<sup>7</sup> Shepherd, C. & Walker, R. (2008). "Engaging Indigenous Families in Preparing Children for School", Australian Research Alliance for Children and Youth (ARACY), 20

<sup>8</sup> Dockett et al. (2010). *School readiness: what does it mean for Indigenous children, families, schools and communities?* Issues paper no. 2. Closing the Gap Clearinghouse. Australian Government, 3

Attracting, retaining and training staff – both Aboriginal and Torres Strait Islander and non-Aboriginal and Torres Strait Islander - is a significant challenge - particularly in remote communities.<sup>9</sup>

SNAICC therefore recommends that a further example be added as follows:

- demonstrates innovative solutions to attract, retain and train staff, for example through flexible work arrangements.

Evidence demonstrates that having Aboriginal and Torres Strait Islander staff is a key feature for services in engaging with and supporting Aboriginal and Torres Strait Islander families and children.<sup>10</sup> Aboriginal and Torres Strait Islander recruitment and retention for ECEC services is challenging,<sup>11</sup> particularly in rural and remote areas, and so strategies to increase this are essential. SNAICC recommends the following point be incorporated:

- actively encourages the recruitment and retention of staff from diverse and/or Aboriginal and Torres Strait Islander cultural backgrounds, as reflected in the community in which the service operates.

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#### **Draft Criterion 4**

#### **Demonstrated engagement of and strong partnerships with parents and families in all elements of service provision.**

Firstly, SNAICC believes that partnerships with parents and families in all elements of service provision is paramount to achieving good outcomes for children. SNAICC is concerned that this criterion is currently optional. It appears that services can also demonstrate this under Draft Criterion 2, and so SNAICC therefore recommends that Draft Criterion 4 be mandatory *if* services have not demonstrated partnerships with parents and families under Draft Criterion 2, points 2 and 3. SNAICC therefore suggests an amendment to the title of Draft Criterion 4 as follows:

Demonstrated engagement of and strong partnerships with parents and families in all elements of service provision (MANDATORY if services have not demonstrated partnership with families under Draft Criterion 2)

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<sup>9</sup> Productivity Commission. (2011). *Early Childhood Development Workforce Report*. Australian Government, 356-357

<sup>10</sup> Productivity Commission. (2011). *Early Childhood Development Workforce Research Report*. Commonwealth of Australia, 359; Rigney, L. I. (2010). 'Indigenous education: the challenge of change'. *Every Child*. 16(4). 10–11, cited by Sims. (2011). Early childhood and education services for Indigenous children prior to starting school'. Closing the Gap Clearinghouse, Australian Government. Resource sheet no. 7, 9; and Sue Lopez. (2008). Indigenous Self-Determination and Early Childhood Education and Care in Victoria. PhD Thesis. Melbourne Graduate School of Education. The University of Melbourne, 85

<sup>11</sup> See Productivity Commission. (2011). *Early Childhood Development Workforce Research Report*. Commonwealth of Australia, 359-360

Feedback from families is vital to ensure that programs are relevant, effective and responsive to child and family needs. SNAICC therefore recommends amending the first point to:

- engages parents and families in developing, implementing and reviewing programs

Whilst SNAICC is pleased to see several examples featured of how services can demonstrate that they encourage family participation once they are enrolled in a service, a key challenge is ensuring Aboriginal and Torres Strait Islander families are aware of and encouraged and enabled to access a service in the first place. SNAICC therefore recommends that a further example be added as follows:

- implements targeted programs to encourage participation and improve outcomes of children and families from diverse and/or Aboriginal and Torres Strait Islander cultural backgrounds, as reflected in the community in which the service operates.

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#### ***Draft Criterion 5***

#### ***Demonstrated cultural competence, and learning from Indigenous Australians***

Aboriginal and Torres Strait Islander cultures have unique and valuable child-rearing practices, which may differ from traditional European practices and values.<sup>12</sup> A key characteristic of a culturally competent early childhood service is recognising and embracing these within service values, practices, principles and programs.<sup>13</sup>

SNAICC also believes that the inclusion of the word 'values' in the point below will emphasise to services that cultural competence is not just about accepting and respecting cultural differences, but also about holding culture in high esteem.<sup>14</sup>

Given these two points, SNAICC recommends that the wording under the first example be amended to include the following:

- demonstrates strong cultural competence, respects and values multiple cultural ways of knowing, seeing, living and child-rearing, celebrates the

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<sup>12</sup> See Secretariat National Aboriginal and Islander Child Care (SNAICC). (2011). *Growing Up Our Way: Aboriginal and Torres Strait Islander child-rearing practices matrix*. Melbourne.

<sup>13</sup> Guilfoyle, A. et al. (2010). 'Culturally strong childcare programs for Indigenous children, families and communities'. *Australasian Journal of Early Childhood*. No. 35 (3), 68–76 cited by Sims. (2011). Early childhood and education services for Indigenous children prior to starting school'. Closing the Gap Clearinghouse, Australian Government. Resource sheet no. 7, 9

<sup>14</sup> SNAICC. (2010). *Working and Walking Together*. Melbourne, 86

benefits of cultural and linguistic diversity and has an ability to understand and honour difference.

With a strong emphasis on ongoing learning and reflective practice as a key principle, and on cultural competence as a key practice, the Early Years Learning Framework provides a solid basis to enable services to encourage cultural competence at the staff level, as well as the organisational. For a service to be culturally competent, it is vital that staff question their own cultural values, principles and assumptions and how these impact on the way they deliver services to families and children.<sup>15</sup> Part of this ongoing reflective process is a shift towards a more inclusive mindset.

In order to ensure that services receiving an 'Excellent' rating are encouraging ongoing learning and reflective practice in staff, SNAICC recommends that the following example be added:

- supports educators to become culturally competent through opportunities for ongoing professional development and guided self-reflection, ensures that these processes are embedded in service procedures, program development and practice.

We also recommend that ACECQA review this Criterion to ensure that it adequately reflects the National Quality Standard 1 Element 1.1.2 that each child's culture is the foundation of the education curriculum. Accordingly, SNAICC recommends that a further point be added:

- actively supports the development of each child's cultural identity by reflecting the values, traditions, history, and culture of the child's community in the service and educational program.

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### **Draft Criterion 6**

#### ***Demonstrated positive workplace culture and organisational values leading to continuous improvement***

It is now clear that Aboriginal and Torres Strait Islander early childhood staff increases Aboriginal and Torres Strait Islander families' participation in services.<sup>16</sup> However, evidence also demonstrates that Aboriginal and Torres Strait Islander workers can be reluctant to work at non-Aboriginal and Torres Strait Islander

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<sup>15</sup> See Grote, E. (2008). *Principles and Practices of Cultural Competency: A Review of the Literature*. Indigenous Higher Education Advisory Council (IHEAC)

<sup>16</sup> Biddle, N. (2007). 'Indigenous Australians and preschool education: Who is attending?'. *Australasian Journal of Early Childhood*, Vol. 32 (3), 9–16; and Hutchins et al. (2009). 'Improving the representation of Indigenous workers in the mainstream childcare workplace'. *Australasian Journal of Early Childhood*. Vol. 34 (1), 2–9 cited by Productivity Commission. (2011). *Early Childhood Development Workforce Report*. Australian Government, 359.



services for a variety of reasons, including a lack of cultural competence at the service, or a reluctance to work at services where there are few or no other Aboriginal and Torres Strait Islander workers.<sup>17</sup> To ensure that excellent services are addressing this issue, SNAICC recommends the following additional example be included:

- is seen as a 'preferred employer' for staff through its approach to supporting and valuing staff from different cultural backgrounds, particularly those that reflect the local community, and ensuring that the service is culturally safe<sup>18</sup> for all.

A service committed to continuous improvement also ensures that staff are encouraged to grow and take on leadership roles that build on their strengths. SNAICC therefore recommends that the following point be adopted:

- enables and encourages staff leadership through its policies, practices and management.

## **5) Summary of recommendations**

The following is a summary of SNAICC's recommendations.

### **Draft Criterion 1**

Recommendation: that the language be made more accessible, and that alternatives or explanations be found for technical words such as 'scaffolding'.

Recommendation: that this criterion be amended to encompass different formats through which services can demonstrate their excellent practice and sector leadership, including multimedia, pictorial, oral and narrative forms.

Insertion of the following point

- educators demonstrate deep understanding of each child, their family, and community contexts in planning for children's learning.

### **Draft Criterion 2**

Amendment of the Criterion title to:

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<sup>17</sup> Productivity Commission. (2011). *Early Childhood Development Workforce Report*. Australian Government, 360

<sup>18</sup> Culturally safe, as defined by the Victorian Aboriginal Child Care Agency (VACCA), means that an organisation enables individuals to feel safe "to be themselves", and to feel safe from covert or overt cultural abuse: VACCA. (2008). *Aboriginal Cultural Competence Framework*. Department of Human Services. Melbourne, 27. A service needs to be culturally safe at the individual (staff), service (values, organisational culture, policies, practices and programs) and systemic (management and policy) levels.

Service is regarded as a lighthouse service through strong and effective relationships and engagement with their community and with research participation

Amendment of the following points:

- participates in research, including academic, experiential or participatory action research, conducted by universities or other research institutions, which have contributed to the broader knowledge base in the field.
- based on a comprehensive understanding and appreciation of the local community context, implements innovative programs with children and families which enhance their community connections
- develops relationships and strategies with local schools to support children and families smooth transition to school.

### **Draft Criterion 3**

Amendment of the following points:

- demonstrates innovative solutions to attract, retain and train staff, for example through flexible work arrangements.
- actively encourages the recruitment and retention of staff from diverse and/or Aboriginal and Torres Strait Islander cultural backgrounds, as reflected in the community in which the service operates.

### **Draft Criterion 4**

Amendment of the Criterion title to:

Demonstrated engagement of and strong partnerships with parents and families in all elements of service provision (MANDATORY if services have not demonstrated partnership with families under Draft Criterion 2)

Amendment of the following points:

- engages parents and families in developing, implementing and reviewing programs
- implements targeted programs to encourage participation and improve outcomes of children and families from diverse and/or Aboriginal and Torres Strait Islander cultural backgrounds, as reflected in the community in which the service operates.

### **Draft Criterion 5**

Amendment of the following points:

- demonstrates strong cultural competence, respects and values multiple cultural ways of knowing, seeing, living and child-rearing, celebrates the benefits of cultural and linguistic diversity and has an ability to understand and honour difference.
- supports educators to become culturally competent through opportunities for ongoing professional development and guided self-reflection, ensures that these processes are embedded in service procedures, program development and practice.

### **Draft Criterion 6**

Amendment of the following points:

- is seen as a 'preferred employer' for staff through its approach to supporting and valuing staff from different cultural backgrounds, particularly those that reflect the local community, and ensuring that the service is culturally safe<sup>19</sup> for all.
- enables and encourages staff leadership through its policies, practices and management.

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<sup>19</sup> Culturally safe, as defined by the Victorian Aboriginal Child Care Agency (VACCA), means that an organisation enables individuals to feel safe "to be themselves", and to feel safe from covert or overt cultural abuse: VACCA. (2008). *Aboriginal Cultural Competence Framework*. Department of Human Services. Melbourne, 27. A service needs to be culturally safe at the individual (staff), service (values, organisational culture, policies, practices and programs) and systemic (management and policy) levels.