



Secretariat of National Aboriginal and Islander Child Care

SNAICC Submission

**2014 Review of the National Partnership Agreement on
the National Quality Agenda for Early Childhood
Education and Care**

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The Secretariat of National Aboriginal and Islander Child Care (SNAICC) is the national non government peak body in Australia representing the interests of Aboriginal and Torres Strait Islander children and families. SNAICC welcomes the opportunity to participate in the 2014 Review of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care.

The review provides an opportune moment to examine the applicability of the National Quality Framework (NQF) to early years services currently out of scope. It provides an opportunity to redress gaps in the current system, as well as an important opportunity to realise early childhood outcomes for particularly disadvantaged children.

SNAICC's submission will consider the following question.

Question 3. Whether the range of services covered by the National Quality Framework should be expanded to include services excluded by the regulations (eg Budget Based Funded services).

SNAICC's submission will focus on the approximately 270 Aboriginal and Torres Strait Islander Budget Based Funded (BBF) services that currently sit outside of the National Quality Framework (NQF).

SNAICC would firstly like to note that the current exclusion of Aboriginal and Torres Strait Islander BBF services risks widening the existing developmental gap between Aboriginal and Torres Strait Islander children and non-Indigenous children by excluding Aboriginal and Torres Strait Islander services from the national drive towards a standardised quality system (Productivity Commission 2011, p364). Various challenges do exist in bringing BBF services within the NQF (discussed below) – and these require serious consideration – however their existence should not result in the exclusion of BBF services from the national drive towards quality. Aboriginal and Torres Strait Islander BBF services can and do implement high-quality programs for their communities, and wish to be recognised and assessed – in a culturally competent and appropriate way - for this.

A. Cultural competence of the NQF

SNAICC believes that consideration of the inclusion of BBF services must begin with the question: Is the National Quality Framework (NQF) culturally competent and how could it be applied to services in a culturally appropriate manner? SNAICC asserts that for the NQF to drive quality in Aboriginal and Torres Strait Islander services, it must be adequately attuned to the needs of Aboriginal and Torres Strait Islander children.

The National Quality Framework provides the impetus for a culturally competent approach to early childhood education and care through its guiding principle that “Australia’s Aboriginal and Torres Strait Islander cultures are valued.” Similarly, the Early Years Learning Framework (EYLF), a key element of the National Quality Standards (NQS), provides an excellent framework for “supporting the kinds of holistic, community-controlled service model represented by the BBFs...” (Brennan 2013, 7). Recent SNAICC research indicates that a number of Aboriginal and Torres Strait Islander BBF services are already implementing the EYLF to a high standard (SNAICC 2012).

Brennan (Brennan 2013, 7) indicates some of the key ways that the EYLF and the national Early Childhood Development Strategy support the philosophies of Aboriginal and Torres Strait Islander early years services:

- The emphasis on service infrastructure being fit for purpose, supporting interdisciplinary and integrated approaches, and “being located to enable ease of access within the community for children and their families” (COAG 2009, 21);
- The recognition that “innovative approaches are required in providing infrastructure for Indigenous families, such as design that takes into account extended family relationships and that is culturally welcoming.” (COAG 2009, 21);
- The endorsement of ‘whole-of-government and cross-sectoral governance arrangements, effective consultation with children and families, and more flexible funding and administrative arrangements ... to better engage with children and families and respond holistically to their diverse issues’ (COAG 2009, 21);
- The clear emphasis on the importance of relationships, collaboration, partnerships and continuity in children’s learning and development. It urges educators to develop ‘learning communities’, to become ‘co-learners with children, families and community’ and to ‘value the continuity and richness of local knowledge shared by community members, including Aboriginal and Torres Strait Islander elders’ (DEEWR 2009, 13).

Brennan states that together, these elements read as a manifesto for the BBF and ACFC [Aboriginal Child and Family Centre] models.” (Brennan 2013, 7).

However, the EYLF is only one element of the National Quality Standard and broader National Quality Framework. SNAICC is concerned that there is currently no provision in the NQF or the NQS for how the principle that “Australia’s Aboriginal and Torres Strait Islander cultures are valued” could be achieved or assessed.

Neither the Framework nor the Standards contains anything specific to cultural competence with respect to Aboriginal and Torres Strait Islander people or services. Recent SNAICC research found that,

There is also no reference to the national agenda to redress Indigenous disadvantage. Aboriginal and Torres Strait Islander culture is rarely mentioned in the NQF or NQS and then only in the context of mainstream services and the inclusion of Aboriginal and Torres Strait Islander culture in their service provision.” (SNAICC 2013, 13)

Recommendation One: *That any considerations of the inclusion of out-of-scope services include review and development of the cultural appropriateness of the NQS for Aboriginal and Torres Strait Islander services and children.*

Recommendation Two: *That the government process of considering the inclusion of Aboriginal and Torres Strait Islander BBF services in the NQS include an explicit process for:*

- (a) input from the Aboriginal and Torres Strait Islander early childhood education and care sector on the cultural appropriateness of all aspects of the NQS, including the assessment and ratings process;*
- (b) intentional learning from Aboriginal and Torres Strait Islander services that are strongly implementing EYLF to inform a more culturally competent NQS that matches the needs of Aboriginal and Torres Strait Islander communities;*
- (c) consideration of above input and learnings; and*
- (d) Government provision of response to input prior to reaching a determination.*

Recommendation Three: *That the government adapts the NQS based on the outcomes of the review process described in Recommendation Two above to ensure it is culturally competent.*

B. Suitability of the NQF for the contexts in which Aboriginal and Torres Strait Islander BBF services operate

Aboriginal and Torres Strait Islander BBF services differ from most mainstream services in that they generally operate in community contexts of high disadvantage and unemployment, and inter-generational poverty and trauma. Consideration needs to be given to whether all NQS elements are appropriate for such contexts.

Secondly, BBF services span a range of service types including long day care, Multifunctional Aboriginal Children's Services (MACS), mobile services, out of school hours care, playgroups, crèches and family day care. Significant diversity exists both between and within service models, including in service opening hours/days, capacity, staffing levels/ratios, family/parental engagement levels, infrastructure, programs provided and fee structures. All service types and contexts must be considered within any discussion of the inclusion of BBF services within the NQF.

One example of the potential challenges BBF services may experience in implementing all Quality Areas lies within Quality Area 4; Staffing Arrangements. Strong anecdotal evidence from BBF services themselves suggests that many services would struggle to meet the higher staff-child ratios and increased staff qualification requirements demanded by the NQS. Most BBF services operate within communities where rural/remote geographical locations and/or disadvantaged socioeconomic conditions result in limited availability of qualified and experienced staff. Sourcing and retaining suitably qualified staff can therefore be a significant challenge. The higher cost of additional, and more highly qualified staff, is also likely to result in higher service fees, which will inevitably limit the access of disadvantaged families.

Further investigation is needed to ascertain which NQS elements may present compliance challenges for BBF services, and how this plays out for each service model. Such investigation should be informed by a strengths based approach that does not assume that the absence of compliance with these Quality Areas indicates lower service quality, but rather explores challenges within external contexts.

Aboriginal and Torres Strait Islander BBF services may require a staged implementation process of the full requirements of the NQF, with appropriate supports and resources, particularly within workforce development, to work towards full implementation of all Quality Areas. Some NQF requirements may require permanent waiver, but this should not preclude services from implementing and being assessed on the NQF requirements they can implement.

Recommendation Four: *Comprehensive consultation with Aboriginal and Torres Strait Islander BBF services and other relevant stakeholders on potential challenges with particular regulatory requirements of NQS Quality Areas, with a particular focus on the diversity of service types.*

Recommendation Five: Consideration of a staged implementation of the NQF for Aboriginal and Torres Strait Islander BBF services, according to the following process:

- a) Consideration of consultation findings;
- b) Framework for staged implementation of NQF within BBF services with appropriate support and resources, linked to a broader community-development agenda.

Recommendation Six: Consideration of permanent waiver, or adaptation of particular standards where they do not support strong practice when taking account of BBF community contexts and the needs of particularly vulnerable children and families.

References

Brennan, Deborah (2013). *Joining the Dots: Program and Funding Options for Integrated Aboriginal and Torres Strait Islander Children's Services*. Options paper prepared for SNAICC. Melbourne.

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