

**INQUIRY INTO EARLY CHILDHOOD EDUCATION AND
CARE SECTOR IN NEW SOUTH WALES**

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Date Received: 15 May 2025

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(a) the safety, health and wellbeing of children in ECEC services

Children's safety and wellbeing must be the single highest priority. I believe that the current Regulations are sufficient in setting out the requirements to meet this priority. This is also evidenced by the agility of the Regulations to be expanded, adapted as needed. E.g., safety of children being transported to and from the service in a bus operated by the service.

I also believe that preservice training for educators in the VET sector meets this need.

I am not able to comment on children's health and safety preservice training in higher ed –

I suspect it is inadequate (particularly in child protection)

Recommendation:

1. Bi-Annual refresher course in Child Protection (or similar to First Aid Certificate renewal)
2. A standardised Child Protection Policy for all ECEC services with the ability to customise procedures to reflect the needs of each service.
3. Customised procedures to be approved by the Regulatory Authority

(d) the effectiveness of the regulatory framework for the ECEC sector as applied in New South Wales

(e) the effectiveness of the NSW ECEC Regulatory Authority

I believe there is a need for reform, but not by strengthening the Regulations, which are already of an extremely high international standard, but by **enforcing the Regulations**.

There are not enough authorised officers currently employed to effectively monitor and support services via planned and spot visits.

Where services are known to have deliberately breached regulations penalties need to be enforced. This should include referral to police for investigation of possible criminal offence/s in cases of abuse/neglect individual children.

Recommendations:

1. Double the number of authorised officers and include greater cultural diversity
2. The government could be innovative and offer 3- 6 month authorised officer employment to existing educators. This would give them much needed respite from face-to-face service delivery and also allow them to experience the role of regulators. (I understand this may be a challenge given the educator shortage).
3. Refer cases of abuse/assault of children to police for investigation of possible criminal offence/prosecution.

Assessment and Ratings System

The NQS rating system requires an urgent review. These Standards were developed to provide a minimum benchmark for quality care in seven key areas. In this instance 'benchmarking' is a process of comparing the service standards (practices) against a set of quality standards (practices) developed by 'experts' and designated as 'the standards' to be met.

Services either 'meet' or 'do not meet' these minimum benchmark standards -the ratings '*working towards*' or '*Significant Improvement required*' are nonsensical. Particularly as there is no mandated timeframe to take action to rectify current practices.

Currently services who are rated as 'working towards' or 'Significant Improvement required' appear to be allowed to continue to operate without a time limit for improvement (in some cases more than 12 months).

Recommendations

1. Change rating system to: 'Meeting' or 'Not Meeting'
2. Where services are rated as 'not meeting' they should be provided with clearly documented evidence to support this rating and clear directions about what needs to be put in place to meet the standard/s and given a limited time to reach minimum standard. e.g., 28 days. Failure to meet the standard/s in this period should result in suspension of the approval to operate until the actions need to meet the standard/s are met.
3. New services should be assessed **within 12 weeks of commencement** (not 12 months as is the case for some new services).

NQS Rating

Services are rated using as a benchmark the seven quality standards. Services are also required to complete a Quality Improvement Plan. The rating system is described as a *continuous improvement system*.

A benchmarked rating system *is not* the same as a continuous improvement system and referring to it as such is confusing and misleading.

Continuous improvement is typically used by organisations to set their own internal benchmarks and work towards meeting these benchmarks in a manner and timeframe that best suits the organisation.

I have no issue with encouraging continuous improvement, but it should not be confused with the current rating system.

NQS Standards

There is a need to review and update the Standards to reflect current best practice research. Many of the descriptors used in the standards are subjective and not measurable, e.g., 'reasonable' precautions, 'deliberate, purposeful and thoughtful'.

The EYLF

The Early Years Learning Framework is an excellent document in terms of defining EC principles, philosophy and best practice in ECEC. However, it is written in highly academic language which is difficult for many vocational students to interpret. I believe it could be supported with additional resources to assist educators to translate EC principles into practice. There are many overseas examples this type of resource which provide practical pedagogical strategies targeted at various stages of development.

Recommendation

1. Use the term benchmarked rating system.
2. Review and update the NQS
3. Adapt/create pedagogical resources to support EC curriculum development. (See Appendices 1)

(b) the quality of ECEC services and the educational and developmental outcomes for children attending ECEC services

'Quality' is a difficult term to define in the context of ECEC services, particularly when considered in different contexts. For example, what might be considered 'quality' in a rural/remote ATSI Children's service may be very different to that of a western Sydney service where for most children English is a second language.

I also fear that services in low socio-economic areas are disadvantaged by concepts of quality. For example, I visited a service in Wagga Wagga that was in a very low socio-economic area – there was no opportunity for fund raising and fees were kept to a minimum. This service looked run down, the equipment was old and the outdoor area had turned to dust due to drought. I then visited a service in an affluent area of Wagga Wagga where the equipment was plentiful and new. The outdoor area, also suffering from the drought, was astro-turfed and look fresh and cool.

What I also noticed was that the staff in both centre had close relationships with the children and were kind and caring.

It made me wonder how the same assessor might rate the two services given the very visible differences.

Recommendation

1. Ensure the rating system that measure quality is fair and objective.

(c) the safety, pay and conditions of workers within the ECEC sector

Recommendation

1. The Productivity Commission Report recommendations in to wages and conditions need to be supported and implemented.
2. Provide financial support directly to educators for ongoing training and professional development

(f) the collection, evaluation and publication of reliable data in relation to ECEC services and the level of public knowledge and access to information made available about each ECEC service

Recommendation

1. Where it does not breach privacy issue, this information should be made publicly available.

(g) the availability and affordability of quality training institutions for early childhood education qualifications

I am CEO of International Child Care College (ICCC), recognised as a high performing RTO by the NSW government. ICCC only delivers training in ECEC and Leadership and Management (customised for ECEC).

I am the author of 5 award-winning textbooks and author of Certificate3 and Diploma assessment tasks and learning resources used by both public and private RTO's and by universities for ECEC training.

I don't believe there is an issue with the 'availability' of quality training institutions for early childhood education qualifications. I believe the issue centres around the content of the CHC30121 Certificate 3 and the CHC50121 Diploma competencies, which were reviewed a few years ago by the former Skills IQ. The outcome of this review was, in my opinion, extremely disappointing.

The Certificate 3 is a demanding course with many complex concepts which younger students find extremely challenging. (in writing my textbooks I have found my needing to significantly increase the glossary so that students gain a degree of understanding of words and concepts).

At Certificate 3 level my philosophy has always been to ensure that at a minimum our students go into the workplace with the knowledge to keep themselves and their colleagues safe and keep children safe. This, requires a wide range of skills and the application of complex knowledge. The Cert 3 course includes 17 units completed over an 18-month period.

Most students training with ICCC are either trainees (working full or part-time in a services) or SBATs (School-Based Apprentices/Trainees).

Our Trainees cope well with the demands of the course because they have the benefit of on-the-job training.

Our SBATs cope reasonably well given the huge volume of assessments that must be undertaken in the workplace. (SBATs typically attend a service one day per week for practical experience and to complete workplace tasks). SBATS are paid a minimum wage and are counted as primary contact staff while at the centre. I find this quite disturbing – they are untrained, typically under 18 years old, trying to learn on-the-job while also being responsible for groups of children. I believe they should not be regarded as primary contact staff – it is too much responsibility and could potentially place children in their care at risk simply because they are not yet qualified to care for the children. This is unfair to both the SBATs and the children.

I am also aware that attending a service **one day per week** creates many obstacles in relation to training. Consider, for example, trying to get to know 20 children, 3-4 staff, as well as understand and follow routines, policies and procedures to ensure that regulatory requirements are met! As well as this SBATs must undertake workplace assessment task.

Diploma course

It is my opinion that at Diploma level student should be consolidating their pedagogical skills, knowledge of child development and have beginning skills as pedagogical leaders.

Currently the course is extremely broad and includes knowledge that might be best gained with experience and further study.

Recommendations

1. Reduce the content of the Certificate 3 course to allow for consolidation of core knowledge and skills.
2. ECEC SBATs should not be included as primary contact staff for the purposes of educator-to-child ratios as per Regulations.
3. In addition to one day per week workplace ECEC SBATs in NSW should be given the opportunity to undertake blocks of work placement during school terms, reflecting best practice in vocational education and training.
4. Review the Diploma course with a view to focusing on pedagogical skills.

(h) the composition of the ECEC sector and the impact of government funding on the type and quality of services

During my 50 years in the EC profession, I have been fortunate to work with many community-based and private services whom I have rated highly. I am concerned that small private providers who are delivering quality care and education are being 'tarred with the same brush' as big corporate providers.

There is no doubt that the corporate sector has made a significant contribution to the expansion of ECEC centres around Australia. Many of the corporate providers are also providing quality education and care.

However, corporate sector providers who expand based on economies of scale and increased profit margins cannot have the wellbeing of children and families as their core goal when they must also provide a return to their investors.

Many of these corporate services are managed centrally. This may result in a lack of understanding of the local context and local needs. Applying standardised policies, procedures, employment practices etc., as a one-size-fits-all approach, in my opinion has led to poor educator performance, breaches in educator-to-child ratios, poor nutrition and a general lack of professionalism. When the person in charge of the day-to-day operation of a service is not on site it is very unlikely that key areas such as performance and meeting regulatory requirements will be effectively monitored.

I would like to see the NSW government limit the number of services that can be owned and operated by the corporate sector so that practices that lead to poor quality service delivery through economies of scale and profit margins are significantly reduced. I recently

read that a corporate group were planning to build sixty centres in Victoria! That is not about caring for children – that's entirely about profit.

Recommendations

1. Limit the number of services that can be owned and operated by large corporations (e.g., maximum of 10) to reduce the incentive of profit over best practice.
2. Require the person in charge of day-to-day operations to be physically on site during operating hours.

Yours sincerely

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