



Community  
Child Care

## Community Child Care Association Submission 4 November 2016

### Improving Quality in Early Childhood Education and Care Training

*Community Child Care Association (CCC) is the peak body for community owned and not for profit early and middle childhood education and care services in Victoria. CCC is the Victorian peak body for Outside School Hours Care Services and the Victorian branch of National Out of School Hours Services Association (NOSHSA). CCC is also the Victorian Branch of the national peak body for community managed and not for profit children's services, Australian Community Children's Services (ACCS).*

CCC welcomes the opportunity to provide a submission to the SkillsIQ industry consultation on the ten ASQA recommendations for action following the August 2015 Australian Skills Quality Authority (ASQA) strategic review *Training for early childhood education and care in Australia*. CCC commends both ASQA and the SkillsIQ for the continued work and commitment to improving quality and consistency in the provision of Early Childhood Education and Care Training in Australia.

#### Key factors influencing quality

1. In your view, what are the overarching factors (both within and outside of the training package), that have the biggest impact on the quality of training outcomes? How would you rate the relative importance of those factors?

CCC believes the following three factors that intersect each other to support a robust quality training system for the education and care sector in Australia must be noted as high priorities on the agenda for improving quality in early childhood education and care training.

#### 1. Quality of Registered Training Organisations (RTO's)

The quality of RTOs, including delivery methods, should be consistent with an established national quality standard to ensure that all students, regardless of their RTO, are being provided with the same quality (sector relevant) course delivery; drawing on current sector frameworks, national quality standards, laws and regulations. In the third wave of the Australian Community Children's Services (ACCS) *Trends in Community Children's Services Survey (TICCS)*<sup>1</sup>, it was found that 'the main cause of difficulties with recruitment continues to be the poor quality of qualifications and skills of applicants' (ACCS 2015, pg27).

For an RTO to deliver an education and care training package, there must be a focus on the quality and standards of the trainer/assessor knowledge and the course materials provided to students so they are able to achieve high level outcomes of practice and knowledge.

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<sup>1</sup> <http://ausccs.org.au/wp-content/uploads/2016/03/2014xxxx-TICCSSReport.pdf>

## 2. Determined and nationally consistent course duration

There must be a standard national consistency for all RTO's that deliver education and care courses that support student's workforce readiness. In a sector that is committed to a cycle of continuous improvement, course duration must adequately reflect the requirement to gain and explore new knowledge/information, practice and implement new skills and knowledge through work placement, time for reflection and assessment, and consolidation of new skills and knowledge for suitable entry into the education and care workforce.

Pre education and care students should not have to guess, shop around or hope for the best RTO that will enable them to be workforce ready. Unless a person has someone to assist them in understanding the adequate training needs to be workforce ready, they are at the mercy of any RTO that they might approach. While some RTOs may be committed to the provision of high quality training delivery and assessment, there should be a national minimum standard that students can expect from all RTOs.

## 3. Adequate assessment practices of students competency and workplace readiness

There must be a more consistent approach between RTOs in relation to the types of assessment that students are given in order to demonstrate their skills and achieve course/unit outcomes.

The consistent assessment processes must also consider not only the outcomes to be achieved, but the reasonable and appropriate time frames in which these can be successfully completed, promoting sustained learning for entry and engagement into the workforce.

Some of CCC's member services have indicated that they will not deal with RTOs that do not have a robust support system for workplace students – this includes attending services for observation visits and assessment visits and support via phone calls.

## Recommendations that directly impact the CHC Training Package

### ASQA Recommendation 1

It is recommended that—as a matter of urgency—the new training package arrangements which are currently being developed include minimum benchmarks around the amount of training required for each unit of competency and each VET qualification across the whole VET system.

2. Do you agree with the ASQA recommendation? Yes
3. What are your views on the value of including an advisory statement about volume of learning in the description of early childhood education and care qualifications?

While CCC agrees with Recommendation 1, we place little value on the inclusion of an advisory statement; advisory statements are often overlooked and do not really impact on the adequate provision of teaching and learning. CCC would value highly, the development of teaching and learning documents for each unit of competency that must guide the delivery of the unit.

4. Do you believe that the development of additional guidance materials for RTOs delivering early childhood education and care qualifications would assist in supporting training of an adequate duration? Yes

What sort of materials would achieve the most impact? What other initiatives could be considered?

CCC believes the development of robust and sector relevant compulsory teaching and learning documents (as suggested above), that reflects the current context and requirements of quality education and care provision in Australia would have a significant impact on the adequate delivery of units.

Other initiatives that could support the adequate delivery of units include the development of,

- 'Practice in action' type video series, or articles
- Professional development opportunities/packages, specifically designed for RTO supervisors/assessors

#### **ASQA Recommendation 5**

It is recommended that any revisions of the Community Services Training Package include reviewing the clarity of wording and expectations of assessment evidence in the units of competency, in order to ensure that advice is unambiguous, clear and aligned with the definition of competency and the rules of evidence.

#### **ASQA Recommendation 7**

It is recommended that any revisions to training packages clearly identify any requirements in each unit of competency for:

- workplace delivery and assessment
- delivery and assessment to be undertaken in a simulated workplace context (including what constitutes an appropriate workplace assessment in each case), and
- repeated demonstration of competencies in the workplace (including what that means for each unit of competency).

5. Do you agree with the ASQA recommendation? Yes. CCC understands that there has been and continues to be work done on reviewing errors and addressing issues of clarity as they are presented. Ongoing review and response to errors or issues of clarity should occur as part of a commitment to the provision of quality training in early and middle childhood education and care in Australia.
6. If you believe change is needed to clarify wording in the assessment requirements of early childhood education and care units of competency, what are the most important changes to be made and why? No response

7. If you have experience in implementing the early childhood education and care qualifications (as an employer or RTO), what are your broader observations about how candidates are being, or should be, assessed?

The literacy skill levels of recent graduates who have obtained an education and care qualification (both Certificate III and Diploma level) is often raised by CCC member services and employers. Concerns about literacy levels are seen when recent graduates are required to provide written information for application of funding, or when documenting and assessing children's learning and development. This raises the question of how written work is assessed. Furthermore, this supports CCC's view that there must be a more consistent and clear approach between RTOs in relation to the types of assessments that students are given in order to demonstrate their skills and achieve outcomes. The consistent and clear approach to types of assessment must also be linked to the reasonable and appropriate time frame in which these can be successfully completed, not just on achieving the outcome.

8. Would you support the development of national assessment materials for early childhood education and care qualifications?

Yes. On 1 January 2012, The National Quality Framework for the Education and Care Sector in Australia was introduced. CCC believes a national standard for the delivery and assessment of early (and middle) childhood education and care qualifications would further support the national quality and consistency of education and care provision. Furthermore, a national standard for education and care qualifications that contain clear assessment requirements that reflect current sector/workforce requirements would help bridge the gap between inadequately trained new graduate students and that of actual on the job requirements for provision of quality education and care of children.

CCC strongly believes the development of national assessment materials is a significant strategy to address the current level of inconsistency of the quality of materials presented to students by various RTOs. While CCC understands that auditing processes in the past have focused on reviewing administrative requirements of RTOs, there needs to be a greater focus on the reviewing and auditing of the quality and standards of assessment materials developed and used by RTOs, to support students to achieve high level outcomes of practice and knowledge.

9. What are your broader views about the need for review of the early childhood education and care qualifications and units of competency? For example:

- Do the qualifications still accurately reflect the skills and knowledge required for current job roles? If not, why not?

CCC acknowledges the significant work that was done in the last training package review for early (and middle) childhood education and care qualifications; resulting in qualifications and units of competency to be much better aligned with the National Quality Framework for

Education and Care in Australia. However, CCC would like to see a commitment to addressing the concerns of inconsistent assessment of students competency (including insufficient work placement timeframes) and the various levels of quality amongst RTOs delivering early (and middle) childhood education and care qualifications in Australia. Our concerns with these issues have been addressed throughout this submission.

- Does the breadth and depth of content accurately reflect workplace needs? Is it too much or too little? What, if anything, needs to be changed?

CCC would suggest an increase to the amount of hours required for work placement. Please see our response to question one in this submission for our additional thoughts and views on this issue.

- How well does the language in units of competency reflect the actual requirements of task? Could some of the language be improved to better reflect real work requirements? Please provide examples. No response

### Discussion of other ASQA recommendations

#### ASQA Recommendation 2

It is recommended that ASQA, Australian Children's Education and Care Quality Authority, and other relevant stakeholders work with the peak bodies that represent the providers of early childhood education and care to improve the process for, and coverage of, early childhood education and care providers informing ASQA of concerns they may have about the quality of training and assessment provided by registered training organisations.

#### 10. What are your views on how ASQA may better collect and use information about training and assessment quality concerns in early childhood education and care?

CCC suggests the following ways as opportunities to gather information about training and assessment quality concerns;

- Randomly scheduled student and staff surveys (currently in the RTO setting)
- Randomly scheduled service surveys (educators/services who have hosted workplace students)
- Surveys or short interviews of students post-graduation, currently working in an education and care service
- ASQA evaluators to observe and assess;
  - teaching and learning practices of students while in an education and care service
  - assessing practices of RTO supervisors in the students' work placement service
- ASQA to review randomly selected pieces of assessment work of current students

The data gained from the above suggested information collecting strategies could be used to inform the development of a national set of standards of assessment practices that support students to be better workplace/sector ready for the role of education and care provision.

If a national standard of assessment practices for education and care qualifications was introduced, the above suggestions would help monitor and ensure assessment and learning practices meet the standards and support national quality and consistency.

CCC acknowledges the recent formation of a range of advisory and industry reference groups and would strongly encourage that these are adequately maintained as a key strategy for consultation.

### ASQA Recommendation 3

It is recommended that ASQA—working with the relevant training package developer—develop and implement a systematic communications strategy to engage with registered training organisations delivering early childhood education and care, in order to explain and reinforce the key findings of this review.

#### 11. What are your views on **how** ASQA should engage with RTOs delivering early childhood education and care qualifications?

- What is the preferred method and regularity of communication?

CCC supports the suggestion of the following methods

- information bulletins/fact sheets
- webinars
- face-to-face sessions
- moderated online forums
- best practice modelling

- Which agency or organisation is best place to communicate on the nominated issues?

While CCC acknowledges ASQA's point that any of the initiatives, as suggested above, would require the application of significant resources. It is critical that a clear communication and education strategy for RTOs is in place. There are a significant number of RTOs delivering the education and care training packages. While CCC strongly encourages all RTOs to engage with key stakeholders and industry representatives to support the delivery of quality teaching and learning, there is a danger that any one organisation will be contacted by a number of RTOs to provide advice and support; which would have significant impact on the individual organisations time and resources. CCC would recommend that funding is sought to facilitate this work.

#### 12. What do you consider to be the most important issues to be addressed in any education or communication strategy with RTOs delivering early childhood education and care qualifications? Do you agree with those suggested above?

Yes, CCC agrees with the suggested issues to be addressed, as noted on page 18 of the discussion paper. In addition, below are two additional key issues CCC believes should be addressed;

- A focus on the assessment and competency of students entering the workforce, to support children with additional needs. Classroom knowledge and understanding is

put to the test in actual service settings, therefore RTOs must ensure that they are providing the best possible training and assessment to support competency in this area.

- Support and education for RTOs to identify high quality services suitable for student work placements. In addition to this, clear advice and expectations of RTO facilitators/assessors to maintain regular monitoring and adequate assessment processes should be provided. This is critical if an RTO is to truly support meaningful teaching and learning practices of students where they are able to reflect on and consolidate their practical skills and knowledge over a period of time that supports their competency and workplace readiness.

#### ASQA Recommendation 4

It is recommended that, towards the end of 2015, ASQA undertakes:

- a targeted strategic audit on the implementation of *CHC30113 Certificate III in Early Childhood Education and Care* and *CHC50113 Diploma of Early Childhood Education and Care*, and
- a targeted strategic audit of distance learning, including online delivery, of early childhood education and care training.

CCC strongly supports Recommendation 4. However, in addition to the targeted strategic audit on the implementation of qualifications, and the audit of various modes of training delivery, CCC would also like to see a targeted strategic audit of how courses are assessed. This highlights again, our view of the importance of the introduction of national assessment criteria.

#### ASQA Recommendation 6

Given that most RTOs reviewed did not effectively embed structured work placement into the learning and assessment strategies—and given the high level of non-compliance against the assessment standard (Standard 15.5 [Standard 1.8 of the 2015 Standards])—it is recommended that RTOs strengthen their engagement with industry employers to ensure that structured workplace learning and assessment is embedded in course delivery.

#### 13. How would you describe the key skills and knowledge required by an RTO delivering early childhood education and care qualifications to effectively embed structured learning and assessment? What do you consider to be the key skills gaps to be filled?

While adequate skill level in broader teaching, learning and assessment practices is a must for all RTOs delivering early (and middle) childhood education and care qualifications, it is critical that any assessment methods used are tested to ensure they reflect actual ability to achieve competency prior to students entry to the workforce. For example, a solid understanding of the Early (and middle) Years Planning Cycle is a must to really understand the time and skill required to achieve competence in this area of practice; which then can support the development of adequate assessment practices and expected timeframes for achieving competency.

CCC would expect that all lecturers/supervisors/assessors hold a minimum amount of (e.g. 5years) experience at a level such as, Diploma room leader or above. It should also be expected

that RTOs have extensive links to the early (and middle) childhood education and care sector, in order to facilitate placements in quality workplaces. In addition to the expectation that all staff hold current qualifications and knowledge, there should be a requirement for all involved (RTO staff) to undertake professional development in their field each year – not just in how to deliver the package, but to update their knowledge of ECEC to ensure they are across contemporary theory and exemplar practice.

**14. What types of support materials and other initiatives would be most useful to RTOs delivering early childhood education and care qualifications?**

CCC recommends the following:

- Specific modules to support lecturers/supervisors/assessors in the teaching of education and care students
- Provision of regular updates and professional development opportunities for lecturers/supervisors/assessors
- Provision for lecturers/supervisors/assessors to spend time in a range of education and care settings (outside of assessing workplace students)

CCC believes the above activities should be mandated for anyone delivering or assessing qualifications.

**ASQA Recommendation 8**

It is recommended that at the next review of the Certificate IV in Training and Assessment:

- the assessment-related units of competency emphasise the analysis and interpretation of competencies, and
- consideration is given to the development of qualifications in VET assessment that could be introduced to supplement the current assessment capabilities of many assessors who currently hold the *TAE40110 Certificate IV in Training and Assessment* (or other qualifications that are considered to be equivalent).

It is recommended that when RTOs develop training materials for a revised Certificate IV in Training and Assessment, that they strengthen the learning and formative assessment activities related to the analysis and interpretation of competencies, in order to enhance the skills and knowledge of assessors in this area.

**15. What specific strategies could be employed to encourage RTOs delivering the TAE40116 Certificate IV in Training and Assessment to ensure an adequate focus on the analysis and interpretation of competencies?**

CCC would recommend a thorough review of the RTOs (including all facilitators) delivering the Certificate IV Training and Assessment, to ensure course quality and duration is adequate. CCC has heard from many member services of various RTOs delivering ‘very quick’ TAE courses; begging CCC to question the ability for any student (of a TAE course) to fully understand and achieve competence in the area of adult teaching, learning and in particular, assessment of competency activities.

**16. How might RTOs delivering early childhood education and care qualifications in particular be better supported to enhance assessment practice?**

In addition to suggestions and recommendations throughout this submission, CCC would also recommend that,

- RTOs are supported to consider assessments and tasks that align with the holistic nature of the [National Quality Framework](#) as a guide, and that
- RTOs are encouraged to liaise with educators and leaders from high quality education and care services.

**ASQA Recommendation 9**

Given the issues with assessment that have been identified in this and the 2013 strategic reviews (ASQA 2013a and 2013b), it is recommended that ASQA:

- continue to focus on assessment and the implementation of validation strategies in its regulatory work, and
- continue to monitor the effectiveness of the strengthened validation requirements in the *Standards for RTOs 2015*.

**17. What are your views about how ASQA might enhance its work in the areas of assessment and validation? No response**

**ASQA Recommendation 10**

It is recommended that RTOs develop or enhance their ongoing professional development processes by:

- providing advice on relevant professional development for trainers and assessors, and
- investigating more systematic models that will assist trainers and assessors to demonstrate compliance with the Standard.

**18. What are the challenges facing RTOs delivering the early childhood education and care qualifications in the professional development of trainers and assessors, and what are your ideas to address those challenges? No response**

**19. Are there best practice examples of systemic professional development models that could be considered?**

Face to face professional development sessions offer a better opportunity for sharing, exploring and collaborating on new and existing quality practices that can inform and influence better training outcomes for students. This should be delivered through multiple sessions over a period of time in order to consolidate learning and to reflect on and evaluate changes in practice. Such training would be best delivered by academics or other highly knowledgeable experts from the field.

Other comments:

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