



Have your say in the NQF Review

If it seems to you that we just had a review of the National Quality Framework, you're right – the process takes about three years, and the 2014 NQF Review resulted in significant changes introduced in October 2017 that we have all had to get across.

SO, WHAT'S DIFFERENT ABOUT THE 2019 NQF REVIEW AND WHY SHOULD WE CARE ABOUT IT?

The last NQF Review was all about the National Quality Standard and resulted in a range of changes to the seven areas of quality assessment, to 'ensure quality education and care in Australia continues to improve in the most efficient and effective way'.

This time the NQF Review will not look at the National Quality Standard or the Approved Learning Frameworks. The Review covers these four areas:

- ▶ Approvals
- ▶ Operation
- ▶ Public Awareness of Service and Quality
- ▶ Compliance and Enforcement

WE HAVE A SHORT WINDOW OF OPPORTUNITY TO HAVE OUR SAY ON HOW THE NQF CAN BE IMPROVED IN THESE FOUR AREAS – BETWEEN NOW AND 30 JUNE.

Before you decide that you don't have time, because of all your other responsibilities, including reporting required under the NQF, here are some issues that may affect you:

- ▶ Should Budget Based Funded (BBF), mobile preschool, in Home Care or occasional care now come under the NQF?
- ▶ How can there be better efficiency and less red tape between Federal and State regulations – especially in approval and planning processes?
- ▶ Should educators who are 'actively working towards a qualification' still be recognised under the NQF as having attained it?

CELA's easy guide to the NQF Review

APPROVALS	
Scope of Services	Currently Budget Based Funded (BBF) services, mobile preschools, In Home Care (IHC) and occasional care are excluded from being regulated under the NQF. This is the chance to give feedback on whether they should now also be brought under NQF regulation. BBF services are already feeling the challenges of being switched from grant funding to administering child-based fee subsidies.
Expansion of Service Provision	If services expand their provision to include transport and overnight care: should there be supervision and ratio requirements for transporting children or overnight care?
Application Efficiency and Effectiveness	The review is looking for suggestions to reduce duplication in the application process between requirements of both State and Territory Regulatory Authorities and the Australian Government under the NQF and the Family Assistance Law (FAL) The Review is also keen for views on how the assessment of whether an individual is 'fit and proper' to run a service can be done more effectively, proportionately and efficiently.
Maintaining current information	Currently there is no requirement to notify the Regulatory Authority for updating the service type or nature of care under the NQF once a service is approved, for example expanding the age of children cared for by incorporating Out of School Hours Care within a Long Day Care service.
Physical Environment	There is concern that too many requests are being made for waivers from the physical space requirements in the NQF. These were only intended to be used in exceptional circumstances, like valuable services in older buildings. Planning approvals can also be difficult to navigate – with State/Territory based planning requirements not including specifications under the NQF, and services hitting snags late in the building process.

OPERATION	
Sustainability of the NQF	Governance arrangements for the administration of the NQF are under review, including fees for providers and their services in the context of the Australian Government Charging Framework. Revenue from fees accounts for less than 10% of the costs of Regulatory Authorities administering the NQF.
Regulatory Approach	There is room to explore whether flexible regulatory approaches , such as increased autonomy for consistently high performing services, could be used as a means of encouraging quality. There is also a question of how to assess providers of services , rather than just individual service quality against the ratings.
Qualification Requirements	Qualification requirements are critical to the quality of education and care provision. The NQF currently recognises educators that are 'actively working towards' a qualification of a certificate III level or above as having that qualification for the purposes of meeting staffing requirement. Should this continue as a practical approach to balance workforce needs and the NQF goals of service quality and child outcomes?
Protection in an emergency	There is concern in the sector about what the exact requirements for emergency and evacuation procedures are, especially in bushfire prone areas, multi-story buildings and in relation to Australian Standards. Are the current requirements for service emergency and evacuation procedures effective and proportionate to the risks?
Out of School Hours Care	Currently different requirements for OSHC services relating to the age of the children attending can cause some confusion for services in how to comply with the regulations. How can the requirements of the NQF better reflect the unique operating context of Out of School Hours Care (OSHC)?
Family Day Care	The National Regulations permit an FDC educator to care for a maximum of 7 children at any one time, of which no more than 4 can be preschool age and under. Are more specific requirements needed for Family Day Care providers in regard to extending the number of children in a service, or to undertake child protection training?

PUBLIC AWARENESS

Value of Quality Rating for families	Research by ACECQA in 2018, found that many parents still have a limited understanding of the quality rating system - How can public knowledge and understanding about quality ratings of education and care services be improved?
--------------------------------------	--

COMPLIANCE & ENFORCEMENT

Appropriateness of Sanctions	The 2014 Review did not specifically examine appropriateness of sanctions under the NQF. This review seeks to consider the effectiveness of current offences and associated penalties in ensuring compliance with the National Law and National Regulations.
Protected Disclosures	The National Law ensures protection from reprisal where a person has made a protected disclosure. There is concern that this protection only protects employees of services and not others such as contractors, parents or Family Day Care educators.
Prohibition Notices	The review is considering expanding prohibition notices to people involved in delivering early childhood services beyond the current categories of posing an 'unacceptable risk of harm to children', or not being a 'fit and proper person'.

HOW TO HAVE YOUR SAY IN THE NQF REVIEW

ATTEND A FACE-TO-FACE CONSULTATION

www.nqfreview.com.au/attend-a-consultation

Consultations are scheduled in specific locations in June in these states:

- ▶ [NSW](#) - Penrith, Parramatta, Lismore, Gosford, Port Macquarie
- ▶ [Queensland](#)
- ▶ [Victoria](#) - Dandenong, Geelong, Ringwood
- ▶ [Northern Territory](#)
- ▶ [South Australia](#) - Mt Gambier, Hallett Cove

These started in early May, and all the sessions have been held already in Tasmania and Western Australia, and some have already been held in NSW, Victoria and South Australia.

VISIT THE NQF REVIEW SITE

www.nqfreview.com.au

- ▶ Includes [Frequently Asked Questions and Timeline](#)
- ▶ Explore and download the [NQF Review Issues Paper](#)

TAKE THE NQF REVIEW SURVEY

- ▶ [Educators](#)
- ▶ [Service Providers & Peaks](#)
- ▶ [Families and Community](#)

WE HAVE UNTIL 30 JUNE TO HAVE OUR SAY

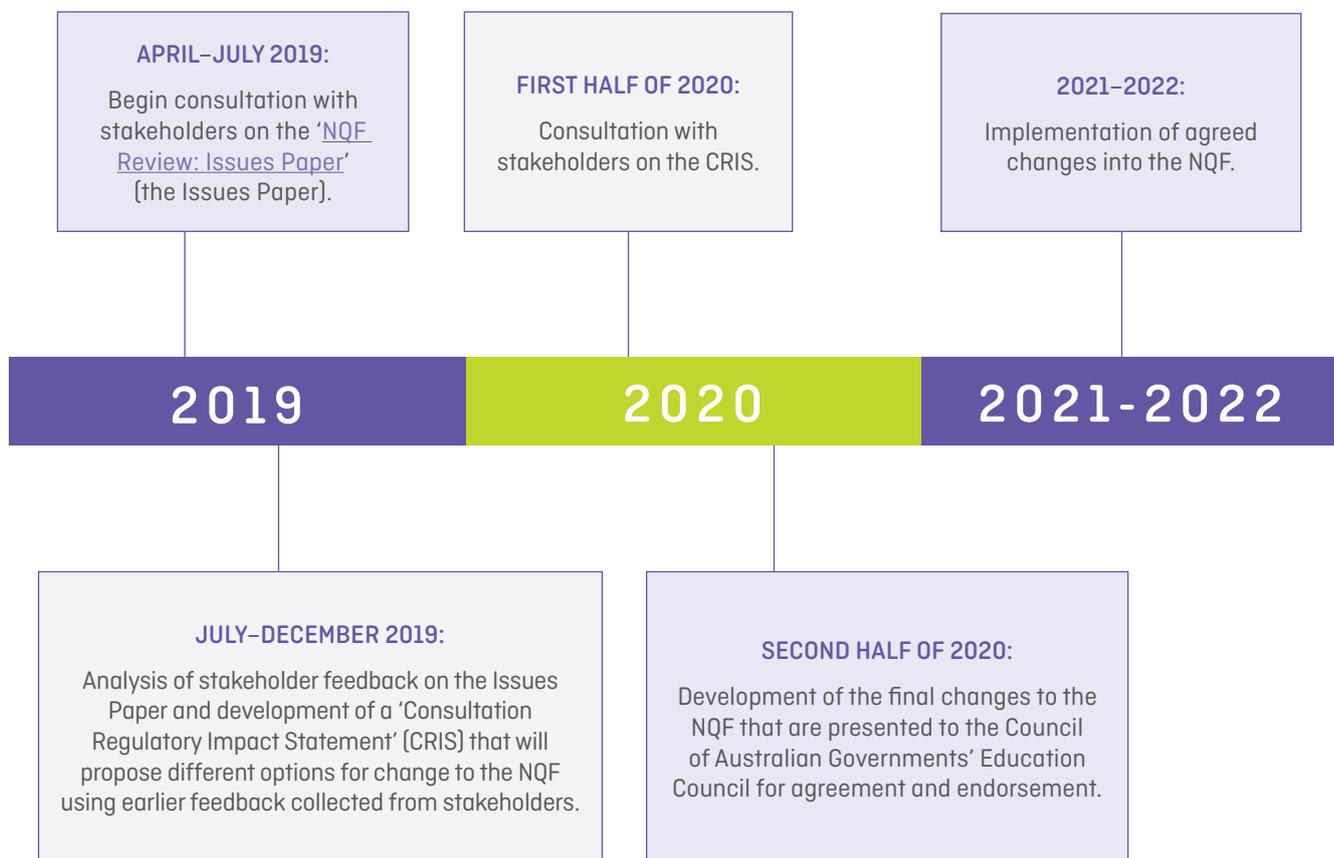
At CELA we would love to hear from you about your key concerns to help us with our response to the NQF Review.

Contact us by phone: 1800 157 818
or email: info@cela.org.au

WHAT HAPPENS NEXT?

Results of the consultation process will be analysed by ACECQA in the second half of this year and they will develop a Consultation Regulatory Impact Statement (CRIS). ACECQA will then consult with key stakeholders about this document in the first half of 2020. The COAG Education Council will be presented with the final changes to the NQF in the second half of 2020, and the agreed changes will be implemented between 2021 to 2022.

TIMELINE





Office and Postal Address

Addison Road Community Centre, Building 21,
142 Addison Road, Marrickville NSW 2204

Phone [02] 8922 6444

Fax [02] 8922 6445

Email info@cela.org.au

Web www.cela.org.au

Facebook www.facebook.com/communityearlylearningaustralia

Twitter @celaust

ABN 81 174 903 921