



15 March 2019

Professor Peter Noonan
AQF Review Panel
Australian Government Department of Education and Training

by email: AQFReview@education.gov.au

Re: Review of the Australian Qualifications Framework

Dear Professor Noonan

Thank you for the opportunity to provide a submission to inform the review of the Australian Qualifications Framework (AQF).

The Australian Children's Education and Care Quality Authority (ACECQA) is the independent national authority established under the *Education and Care Services National Law* to guide the implementation and administration of the National Quality Framework (NQF).

The NQF is the national system for regulating approved education and care services, setting levels of safety and quality for all children who attend long day care, preschool/kindergarten, outside school hours care and family day care. The NQF is jointly governed by the Australian Government and all state and territory governments.

The NQF sets staffing requirements for regulated services, including requirements for educators to hold approved qualifications. Since its introduction on 1 January 2012, the NQF has progressively introduced higher qualification requirements, most notably improved educator to child ratios, a requirement to employ an early childhood teacher in all relevant services, and a requirement for at least half of educators included in relevant ratios to hold, or be actively working towards, an approved diploma level (AQF 5) or higher qualification. All remaining educators must hold, or be actively working towards, an approved certificate III level (AQF 3) or higher qualification.

Use of the Australian Qualifications Framework

Under the National Law, ACECQA has the function to determine the qualifications to be held by educators, including the assessment of equivalent qualifications. The ACECQA Board has developed guidelines and requirements to administer this function.

ACECQA's published guidelines¹ directly reference the AQF qualification type descriptions. In brief:

- approved certificate III level educator qualifications must meet at least the AQF level 3 descriptors
- approved diploma educator qualifications must meet at least the AQF level 5 descriptors
- approved early childhood teaching qualifications must meet at least the AQF level 7 descriptors.

¹ 'Guidelines for the determination of equivalent early childhood qualifications':
www.acecqa.gov.au/qualifications/assessment/apply/early-childhood

Overseas qualifications are assessed for comparability and equivalence to the AQF qualification descriptors, typically using resources provided by the Australian Government, such as the Country Education Profiles.

Over the years, ACECQA has experienced some challenges comparing the AQF to frameworks such as the Qualifications and Credit Framework (QCF) for England, Wales and Northern Ireland. This has created some barriers for overseas qualified educators seeking employment, for example Level 3 QCF qualified educators from the UK seeking employment as diploma level educators in Australia, due to difficulties around mapping the respective frameworks stemming from a lack of clarity and specificity.

Following on from this review, opportunities may exist to undertake detailed analysis of high volume international frameworks and seek greater alignment and comparability between them and the AQF.

Volume of learning and course duration

Educators in early childhood education and care services are responsible for some of the most vulnerable members of our society, including babies and very young children. Training which fails to equip graduates to meet legislated obligations puts them and their employer at risk of investigation and enforcement action. It also puts children at risk, as the regulatory requirements are primarily in place to ensure their health, safety and wellbeing, and enhance their learning and development.

Course duration is one of the foremost training quality issues for the early childhood education and care sector.

Concerns about unduly short duration courses, particularly the prevalence of ‘fast-track’ qualifications at certificate III and diploma levels, have been raised repeatedly by employers and reinforced by reports from the Productivity Commission² and the Australian Skills Quality Authority (ASQA)³.

ACECQA notes that current AQF policy references a volume of learning range for both certificate III and diploma qualifications of 1-2 years (1200-2400 hours). ASQA’s 2015 review of early childhood education and care training provides evidence that these guidelines are not effective. The review found that over 70% of the delivery of the then Certificate III in Children’s Services was occurring in programs of less than one year’s duration (with 20% of it occurring in programs of six months or less).

These unduly short duration courses erode sector trust in the Australian vocational education and training system, particularly when comparing graduate outcomes to overseas qualified educators at comparable educational levels.

A major update of the national children’s education and care training package (which includes the Certificate III in Early Childhood Education and Care and the Diploma of Early Childhood Education and Care) is currently being undertaken and is due for completion this year⁴. However, given the current training package policy is silent on duration, the Skills Service Organisation responsible for the update, SkillsIQ, has not addressed course duration beyond reference to the current AQF policy.

² Productivity Commission ‘Childcare and Early Childhood Learning’ inquiry report, 2015

³ ASQA ‘Training for early childhood education and care in Australia’ strategic review report, 2015-2016

⁴ SkillsIQ ‘Children’s Education and Care Training Package Development’:

www.skillsiq.com.au/CurrentProjectsandCaseStudies/ChildrensEducationandCareTPD

ACECQA maintains that the best strategy to reduce the prevalence of unduly short courses is for there to be a mandatory minimum course duration for new learners.

ACECQA accepts there is an inherent tension between allowing flexibility and ensuring courses are of sufficient duration to guarantee competency is achieved. However, governments have agreed a national system of regulation which requires individuals working in early childhood education and care services to hold particular qualifications.

This is because governments and the community are concerned about the significant risks to children if the individuals who educate and care for them are not adequately trained. Therefore, ACECQA sees it as important to prioritise quality and set mandatory minimum durations, even if flexibility is somewhat impeded.

Articulation between vocational education and training, and higher education

From 1 January 2020, additional qualification requirements will come into effect under the NQF, requiring long day care services and preschools/kindergartens educating and caring for 60 or more children to employ an additional early childhood teacher or 'other suitably qualified person'.

It is estimated that the sector will require around 9000 additional degree qualified early childhood teachers by May 2023 to meet increasing regulatory requirements and forecast demand. This represents an almost 20% increase for the workforce over the next five years⁵. With this growth in mind, ensuring an ongoing, high quality 'pipeline' of teachers for the sector remains a key issue.

Articulation between vocational education and training, and higher education, specifically between the Diploma of Early Childhood Education and Care and degree level early childhood teaching courses, is critical to meet this future demand. However, individual institute credit / advanced standing arrangements can be unclear and/or inequitable, and are exacerbated by the persistent quality training issues in the vocational education and training sector.

Greater clarity and consistency in the requirements for up-skilling from a diploma to a bachelor degree would assist higher education institutes to provide meaningful and much needed pathways for diploma qualified educators. It would also assist governments to promote national pathways, rather than relying on institute specific programs.

I trust that this information is of assistance in informing this review. If you would like further information or to discuss, please contact Michael Petrie, General Manager Strategy, Communications and Consistency on 02 8240 4230.

Yours sincerely



Gabrielle Sinclair
Chief Executive Officer
Australian Children's Education and Care Quality Authority

⁵ Australian Government Department of Jobs and Small Businesses, 2018 Employment Projections - for the five years to May 2023, December 2018.