



Review of the Early Childhood Teachers Interim Policy: Final Report

Author/Contributor:

Purcal, Christiane; Fisher, Karen

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**REVIEW OF THE EARLY
CHILDHOOD TEACHERS
SHORTAGE INTERIM
POLICY**

FINAL REPORT

FOR THE NSW DEPARTMENT
OF COMMUNITY SERVICES,
OFFICE OF CHILDCARE

SPRC Report 5/04

Social Policy Research Centre
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For a full list of SPRC Publications see, www.sprc.unsw.edu.au or contact:
Publications, SPRC, University of New South Wales, Sydney, NSW, 2052, Australia.
Telephone: +61 (2) 9385 7800 Fax: +61 (2) 9385 7838 Email: sprc@unsw.edu.au

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Social Policy Research Centre

Karen Fisher, Christiane Purcal and Sonia Hoffmann

Authors

Christiane Purcal and Karen Fisher

Contact

Karen Fisher ph 02 9385 7813, fax 02 9385 7838, email karen.fisher@unsw.edu.au

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Abbreviations

CPO	Community Programs Officer
CSA	Children’s Services Adviser, employed by the Department
DoCS	NSW Department of Community Services (the Department)
DPP	Director of Partnerships and Planning
ECT	Early Childhood Teacher
SPRC	Social Policy Research Centre

Summary and Recommendations

In May 2002 the NSW Department of Community Services introduced an interim policy to deal with increasing reports from children's services about a shortage of qualified early childhood teachers (ECTs). This interim policy states conditions under which a service that has been unable to recruit an ECT can gain approval from the Department to appoint to this position for up to one year a less qualified person who is studying towards an ECT degree or is willing to enrol. So far 176 interim approvals have been granted, all of them to long day care centres.

The Department is currently reviewing this interim policy. It commissioned the Social Policy Research Centre (SPRC) to assess the impact and effectiveness of the interim policy and recommend future options. SPRC researchers analysed quantitative data on children's services and interim approvals provided by the Department, conducted 20 interviews with stakeholders and presented their findings to the Department's Reference Group for the Early Childhood Teachers Interim Policy Review.

This report describes the background, methodology and results of the research. It outlines two options for the future of the interim policy, and two contextual recommendations. The two options are:

1. Discontinue the interim policy. The interim policy undermines the intent of the regulation and reduces the quality of care provided to children. The research showed that the variation approval rates across the state is not explained by remoteness and some licensees use the interim policy as a way to recruit cheaper, less qualified staff than the regulation requires.
2. Amend the interim policy. Serious shortcomings in the implementation of the interim policy could be mitigated by substantial amendments. These include: no interim approvals for new or expanding services; no multiple approvals; no re-approvals after 12 months; no approvals for staff who are not yet studying; more evidence of recruitment efforts; requirements for pay; working conditions and study support for the approval teacher; and a structure for monitoring compliance with the interim policy.

The SPRC recommends the first option because even an amended interim policy would allow services to circumvent the purpose of the regulation, thus compromising the good quality standard aimed for in children's services in NSW. Genuine cases of ECT shortage seem to occur rarely and can be dealt with through Ministerial approval, as was the practice before the interim policy was introduced.

The SPRC also recommends that two contextual issues be addressed. First, the shortage of ECTs in long day care centres needs to be relieved. In an earlier report for the Department, the SPRC made detailed suggestions for recruiting more people into the profession and for retaining qualified ECTs. The suggestions include better professional support and working conditions in long day care centres.

Second, CSAs and other DoCS field staff need to be better resourced, trained and supported. This research showed that some DoCS staff did not understand the purpose and approval conditions of the interim policy. More generally, there was substantial evidence that their capacity to enforce ECT regulatory requirements is limited.

1 Introduction

The NSW Department of Community Services (the Department or DoCS) regulates children's services to ensure that they provide a safe and healthy environment and have in place developmentally appropriate programs for all age groups. According to the Department's regulations, services must employ a specified number of trained early childhood teachers (ECTs), depending on the number of children.¹ This requirement follows from decades of international research consistently showing the importance of qualified teachers in achieving positive learning and behaviour outcomes for children (Brennan, 1998).

In recent years, NSW has experienced an apparent shortage of early childhood trained staff in child care services. This has resulted in children's services requesting the Minister to approve non-compliance with the regulation to employ qualified teachers. The Minister granted a number of approvals, allowing a less qualified person to be temporarily employed in the position of teacher so that the service could meet its licensing requirements while it continued searching for appropriately qualified personnel.

In 2001, the Department noticed an increase in the number of service providers seeking approvals. Therefore in May 2002 the Department implemented an interim policy measure that allows child care providers to employ a person with a lesser qualification as the teaching staff member for up to twelve months, while the providers continued to search for a qualified staff member, if the person approved is enrolled in a course of study to qualify as an early childhood trained teacher or is willing to enrol.

By October 2003 a total of 176 such interim approvals had been granted. The Department decided to review the interim policy, and as part of this review it commissioned the Social Policy Research Centre (SPRC) to assess the policy's impact and evaluate future options.

The SPRC research focussed on:

- the effectiveness of the interim policy;
- any issues or barriers in its implementation;
- the relationship of the interim policy to industrial and vocational training matters;
- future options in regard to continuation, amendment or cessation of the policy including possible impacts from these courses of action; and
- other possible policy options, giving regard to the continuation of the regulatory requirement.

The Department appointed a stakeholder Reference Group to comment on the findings during the research process.

This report describes the research methodology (Section 2), gives recommendations for the future of the interim policy (Section 3) and for addressing contextual issues (Section 4).

¹ Centre Based and Mobile Child Care Services Regulations (No.2) 1996, cl. 35(1)

2 Methodology

The SPRC research on the interim policy included the analysis of quantitative data from the Department, interviews with Children's Services Advisers (CSAs), licensees, approval teachers and other stakeholders, the analysis of the interview findings, and the presentation of data and interview findings to the Department's Reference Group for the Early Childhood Teachers Interim Policy Review.

The Department provided the SPRC with administrative data relating to children's services in general and interim approvals in particular. This data included:

- lists of children's services requiring early childhood qualified teachers, the DoCS Area they were located in, the type of service (long day care, preschool etc) and the type of sponsor (privately operated or non-profit);
- interim approvals by Area as well as service and sponsor type; and
- complaints to DoCS against services, by Area and interim approval status.

The administrative data was aggregated, analysed and summarised in table format (Appendix A) in order to discern trends in the numbers of interim approvals regarding location, service type and other factors. In November 2003, the data analysis was presented to the Reference Group, which discussed possible interpretations.

The data analysis also informed the stakeholder interviews. In total 20 semi-structured interviews of up to 90 minutes each were conducted. Interviewees were selected in collaboration with the Department. They belonged to the following stakeholder groups:

- DoCS staff (seven individual and group interviews). These included interviews with CSAs and other staff involved in implementing the interim policy (mostly DPPs and CPOs) from six DoCS Areas or Regions, both in metropolitan Sydney and in regional or rural locations. Of these interviews, four were group interviews with between four and 13 participants. A total of 30 DoCS staff participated.
- Child care providers (eight interviews). The SPRC and DoCS selected four children's services in four DoCS Areas (two metro, two regional or rural). The DoCS staff interviews also covered the same Areas. In each of the four children's services, the licensee and an approval teacher were interviewed.
- Interest groups and large employers (five interviews). Among these were unions and representatives of private and non-profit operators.

All interviews covered the following issues: experiences of the effectiveness of the interim policy, issues or barriers in its implementation, industrial and vocational training matters and suggestions for future options. Since viewpoints and experiences vary greatly among different stakeholder groups and subgroups, different lists of interview questions were developed (Appendix B). An overview of the interview findings was presented to and discussed by the Reference Group in December 2003.

3 Future Options Regarding the Interim Policy

Quantitative data analysis, interviews and Reference Group discussions revealed that the interim policy is highly problematic. Leaving it in place unchanged is not a viable option. It needs to be either discontinued or amended substantially. Based on the results of this research, the SPRC recommends discontinuing the interim policy because it undermines the purpose of the regulation about employing specified numbers of qualified early childhood teachers.

This section explains the two options regarding the future of the interim policy: discontinuing or amending it. The discussion of each option includes the recommendation, the rationale and suggestions, and the practical implications.

3.1 Discontinue the Interim Policy

Recommendation

Based on the research findings of this review, the SPRC recommends that the interim policy be discontinued. No new interim approvals should be issued. Existing interim approvals should remain until their current expiry date so that services have time to either recruit qualified early childhood teachers or reduce child numbers to comply with the regulations.

Rationale

The interim policy was intended as a short-term measure, to extend to a maximum of 12 months the time for licensees to recruit a qualified early childhood teacher while a person who intends to qualify fills the position. However, the research found that some providers with approved positions regard the interim policy as a way to circumvent the regulation. Most licensees reportedly abandon their recruitment efforts once they have the interim approval. Some anticipate that the interim approval will be extended beyond 12 months, preferably until the approval teacher completes their studies. These licensees criticised the interim character of the policy. In their view it creates uncertainty for the service and the approval teacher as well as undue expense and effort when advertising has to recommence after nine months. This attitude reveals a lack of commitment to comply with the regulations.

In some cases interim approvals were granted to new services, or to enable existing services to increase child numbers. This is contrary to the intent of the interim measure. Instead, it sanctions the creation of new child care places without the accompanying quality of care provided by ECTs.

Stakeholders argued that the interim policy is needed in certain areas of NSW that have particular difficulties attracting ECTs, mainly rural and most regional areas, and also some metro regions. Analysis of interviews conducted for this review and of data on interim approvals did not support such assertions. There is no consistency in the city-country split in the rate of interim approvals (Appendix A, Table A.2). There are services operating in all areas of NSW – including areas with high interim approval rates – that employ more ECTs than the regulation requires.

Interviews showed that the different interim approval rates are largely due to the different approaches of DoCS staff towards children's services, compliance with the regulations and application of the interim policy. Variations range from DoCS Areas

with no approvals, where CSAs stand firm on requiring services to recruit ECTs; to DoCS Areas with high approval rates, where CSAs freely suggest licensees use of the interim policy.

Privately operated services are highly over-represented among services with interim approvals: private services are 52.3 per cent of all services in NSW that require ECTs, but 79.4 per cent of services with interim approvals, an over-representation of more than a quarter (27.1 per cent; Appendix A, Tables A.1 and A.2). Of the 176 interim approvals granted so far, 84.1 per cent are held by private licensees. One corporate service provider alone, ABC Learning Centres Pty Ltd, holds 31 interim approvals, or 17.6 per cent of all interim approvals, even though they have only 65 centres requiring ECTs (4 per cent of centres requiring ECTs).

From the data it appears that the interim policy has helped facilitate ABC's expansion in the last few years, mainly in the Riverina and Far North Coast Areas, despite a shortage of ECTs in these areas. Overall, it seems private services either have more difficulty attracting qualified staff than non-profit operators or they are more inclined to use the interim policy. Large non-profit providers interviewed for this review reported that they had not used the interim policy and that they were philosophically opposed to it because it undermined the quality standards in the regulations.

According to all interviewees except private service licensees, the main reason for the over-representation of private services among services with interim approvals is the intention to maximise profits. Private child care services are businesses that need to generate a surplus. Interviewees argue that, while some business owners invest readily to offer good quality care, others try to cut costs. Many interviewees reported that this makes the service a less attractive workplace for a qualified ECT. Faced with the difficulty of attracting qualified staff, a licensee can resort to the interim policy to avoid breaching their licence. From a business perspective, this also helps to reduce costs further because it allows the service to employ less qualified and therefore cheaper staff. This is contrary to the intent of the interim policy.

Financial considerations are also evident in the way approval teachers are rewarded and supported. Interviews with licensees and approval teachers conducted for this review found that approval teachers in private services were paid less and received less study support than approval teachers in non-profit services. This finding can be generalised, based on the interviews with CSAs and interest groups.

The regulation requires a minimum number of ECTs to be employed in order to guarantee quality child care. According to all interviewees, except private service providers, quality of service and teaching suffers in centres with interim approvals, especially if the approval teacher fills the only ECT position in the service or if a centre has multiple approvals.

DoCS data on complaints received since 1998 supports this finding (Appendix A, Table A.3). Of all the licensed early childhood services in NSW, 28.4 per cent have had complaints against them, compared to 45.2 per cent of services with interim approvals. In other words, services with interim approvals are more likely than other services to have received complaints against them. Moreover, most of the complaints relate to teaching or staffing issues.

In summary, the interim policy was not applied as it was intended. Consequently, the quality of teaching and care for the children has been compromised.

Implications

Discontinuing the interim policy could create difficulties for services with current approvals if they have an expectation of re-approval. It is the intention of the interim approval policy that licensees with approval teachers should be attempting to recruit qualified staff or reduce the number of children within the 12 month approval period. Some licensees and CSAs do not seem to understand this obligation.

The SPRC recommends that the Department allow services a transition period to the end of the current approval to recruit qualified staff or reduce child numbers to a level that complies with the regulation, rather than withdrawing any current approvals.

In the short term this might lead to a drop in available child care places. The overall impact would be small because the 126 services with interim approvals amount to only four per cent of all licensed early childhood services in NSW requiring an ECT. The places that will be lost are, in terms of the regulations, sub-standard places.

Without the interim policy, some services will have to increase their efforts to attract qualified staff. This could be achieved in most cases, as the people interviewed have pointed out, through improved advertising and more attractive pay, working conditions and professional support (Section 4.1).

Without question, there are some genuine cases where services cannot recruit ECTs despite their best efforts. Such cases occur in remote locations, and often the service in question is the only one available to the children of the area. In such extreme circumstances the Office of Childcare could grant Ministerial approvals, as was the practice before the introduction of the interim policy.

3.2 Amend the Interim Policy

Should the Department decide to keep the interim policy in place despite its implications for compromising quality of care in children's services, the second option is amending the interim policy to mitigate some of its detrimental effects.

Option

Given the concerns about the interim policy raised by the quantitative data analysis and interviews conducted for this review, the SPRC recommends that the interim policy be significantly amended if it were to be retained. A list of suggestions follows. The SPRC does not recommend this option because an amended interim policy would compromise the purpose of the regulation.

Suggested amendments

The following amendments were developed from the analysis of quantitative data, interview findings and discussions in Reference Group meetings.

1. The policy should remain an interim measure and be reviewed again in 12 months. It should not be made permanent, as this would contradict the intention of the regulation requiring qualified ECTs. Since the regulation states that a service requires a certain number of ECTs, there should not be a policy allowing services

- to operate without the required ECTs because of the impact on quality of care for children.
2. No interim approvals should be granted for new services or for services wishing to increase child numbers. While there is demand for additional child care places, any expansion should conform to the regulation.
 3. Multiple interim approvals should not be granted. Interviewees pointed out that quality problems are compounded when more than one ECT is missing in a service, and especially if all ECTs are replaced by approval teachers.
 4. The Department should not grant interim approvals to services where the approval teacher replaces the only ECT. If one person carries the triple load of working fulltime, studying and being the senior teaching staff member in a centre, especially without support from other qualified ECTs, it is likely that the quality of care for the children will be significantly reduced.
 5. Re-approvals should not be granted because they make the interim policy effectively permanent, thus compromising the regulation. The Department should explain clearly to the licensee the purpose of the interim policy, i.e. to give the service up to 12 months extra time to recruit appropriately qualified staff. If the service cannot recruit an ECT within that extra period, the number of licensed places should be reduced.
 6. Interim approvals should not be granted to staff intending to enrol in a course but only to students who have already commenced studying, and preferably only to students in their last year of study. Experience with the interim policy has shown that some staff declare their intent to study but do not start studying within the year. In other cases staff have been pressured to enrol in a course. This is contrary to the intent of the interim policy, which was to allow a person who intends to qualify to temporarily fill the position of a fully qualified ECT.
 7. Guidelines for the interim approval process should be made clearer to licensees and CSAs and stricter in their requirements. There should be a prescribed minimum format for advertising to avoid insufficient efforts; an interim approval application form to clarify the requirements, ease compliance and reduce delays in the application process; and a formal notification of the interim approval and its conditions to both the licensee and the approval teacher.
 8. More evidence of recruitment efforts should be required of licensees. Before granting an interim approval the Department needs to be satisfied that the licensee has done everything feasible to attract an ECT and that there have been no suitable applications. Currently CSAs are unable to ascertain the number and quality of applicants, and there are confirmed instances where licensees have not disclosed that they received applications from qualified teachers that they did not appoint. But it is unclear how more transparency can be achieved. Neither the interviewees nor the members of the Reference Group had any workable suggestions. This is a major flaw in the interim policy, opening the door to its abuse.
 9. As part of the interim approval the Department should set minimum requirements for pay, working conditions and study support for the approval teacher. This could

help to ease the approval teacher's difficulties of studying and working at the same time, and discourage licensees from using the interim approval as a cost-saving measure. These conditions could be arrived at through discussions with stakeholder groups including the unions, which suggested such a process during the review interviews.

10. The Department should set up a structure for monitoring compliance with the interim policy. This should include mandatory quarterly reports from the licensees outlining their efforts to recruit a qualified ECT, confirming that they meet all the interim approval requirements regarding pay, working conditions and study support, and showing the approval teacher's progress in their studies. Failure to lodge the quarterly report or non-compliance with the conditions should trigger an automatic withdrawal of the interim approval without the right to re-apply. If CSA resources were increased, regular visits to the service to ensure compliance would also be recommended.

Implications

If the suggested amendments were implemented, the use of the interim policy would be restricted considerably compared to the current state, and it would be more expensive and more difficult for licensees to meet all the requirements. This would alleviate some of the serious problems associated with the current abuse of the interim policy. It would not, however, curb abuse sufficiently to maintain the integrity of the regulation. In particular, there is no obvious mechanism to prevent licensees from failing to disclose suitable applications to the Department. It would also not fully address CSAs' capacity to monitor the policy (this point is taken up further in Section 4.2).

Amending the interim policy as suggested might leave only very few cases in which interim approvals would actually be granted. These could be dealt with through Ministerial approval administered by the Office of Childcare, while the interim policy could be discontinued.

4 Context of the Interim Policy

The interim policy operates within the larger context of the regulatory framework put in place to supply good quality child care services to the public. The research findings indicated that two important issues within this larger context need to be addressed, whether the Department discontinues or amends the interim policy. These issues are the shortage of qualified ECTs and the difficulties of CSAs and other DoCS staff to implement the regulations.

4.1 Follow up Earlier Recommendations

The interim policy arose out of an apparent shortage of qualified ECTs. The extent of the shortage is unclear, but there is no doubt that services compete for qualified ECTs, and that ECTs can choose where they work. The current supply of ECTs can hardly sustain the existing number of child care places, let alone support an expansion that would meet the demand for child care.

The shortage is confined to long day care. All 176 interim approvals were granted to long day care centres. During this review interviewees consistently pointed out that ECTs prefer to work in preschools or, if they have the qualification, in primary schools (see also Finger, 2002).

Working in long day care needs to be made more attractive to qualified ECTs. The Department has already recognised this issue. In 2001 it commissioned the UNSW Consortium, managed by the SPRC, to undertake research into the reasons for the ECT shortage. Along with its research findings, the Consortium presented a comprehensive list of suggestions for building and maintaining ECTs' connection to the profession (Warrilow et al, 2002). The suggestions relate to wages and conditions, qualifications and education, recruitment, and professional support and status.

The SPRC recommends that the Department act on these suggestions. All stakeholders including Governments, employers, unions, peak bodies and educational institutions need to contribute to improving workplace conditions, increasing recruitment into the profession and retaining qualified ECTs.

4.2 Support for Children's Services Advisers

While the licensees of children's services are responsible for meeting regulatory requirements, it is the role of CSAs (and other DoCS staff in the field, mainly their managers, the Directors of Partnerships and Planning (DPPs), and Community Programs Officers (CPOs), here simply referred to as CSAs) to assess and monitor compliance with the regulations. This research found that CSAs do not have the capacity to fulfil this role consistently and sufficiently. As a result the regulations are enforced differently across the State.

Regarding ECT requirements and the interim policy, CSAs operate between two extremes. At one end are those who do not apply the interim policy at all but instead make services comply with the regulation. At the other end are CSAs who encourage services to use interim approvals.

Most CSAs who were interviewed for this review felt compelled to apply the interim policy because they saw themselves as powerless to enforce ECT requirements. For

fear of public criticism, they do not dare to close services should the providers not comply with the regulations. Instead, they see themselves operating at the mercy of the providers, relying on their willingness to follow regulations and being reduced to hassling them to either recruit qualified ECTs or provide the documentation required for an interim approval.

The SPRC recommends that CSAs across the State be provided with appropriate support to ensure accurate understanding, consistent implementation and full enforcement of the regulations. This would require:

1. Personnel

During the interviews most CSAs asserted that they have too little time to monitor services' compliance with the regulations. Services do not usually report staff shortages to the Department. Instead CSAs stumble on breaches during licensing or complaint visits. This indicates that breaches in other centres remain undetected. The current rapid expansion in the child care sector exacerbates this problem further. More personnel are needed to monitor compliance and thus maintain quality standards.

2. Training

Research findings showed that many CSAs do not understand the intent of the interim policy. They apply it not as a restrictive interim measure to allow extra time to attract a qualified teacher, but as an authorisation for services to operate with less than the required number of ECTs. CSAs need more training, information and clear guidelines about how to apply policies or regulations. CSAs should be trained to assist services to comply with the regulation, for example, by providing advice on recruitment strategies. Regular training courses organised by the DoCS central office should be considered.

3. Empowerment

It was disturbing that CSAs reported a lack of capacity to enforce compliance with the regulations. Training and support mechanisms need to be put in place to enable CSAs to develop the capacity to exercise their responsibilities. Regular training and discussions with CSAs of other Areas and with central office staff could be useful.

Appendix A Tables

Table A.1: Early Childhood Services in NSW Requiring Early Childhood Teachers

Region	Area	All services	Private services		Non-profit services	
			no.	%	no.	%
Western	Orana Far West	23	9	39.1	14	60.9
	Riverina Murray	59	28	47.5	31	52.5
	Central West	39	16	41.0	23	59.0
Hunter		121	56	46.3	65	53.7
Southern	Illawarra	68	32	47.1	36	52.9
	Southern Highlands	46	25	54.3	21	45.7
Northern	New England	40	16	40.0	24	60.0
	Mid North Coast	59	33	55.9	26	44.1
	Far North Coast	59	38	64.4	21	35.6
Metro West	Blacktown	121	60	49.6	61	50.4
	Cumberland	68	40	58.8	28	41.2
	Nepean	93	41	44.1	52	55.9
Metro North	Northern Sydney	208	118	56.7	90	43.3
	Central Coast	86	54	62.8	32	37.2
Metro South West	South West Sydney	103	63	61.2	40	38.8
	Inner West	108	47	43.5	61	56.5
	Macarthur	83	55	66.3	28	33.7
Metro South East	South East Sydney	211	103	48.8	108	51.2
Total		1595	834	52.3	761	47.7

Source: NSW Department of Community Services

Notes: As of October 2003, there were 1595 licensed early childhood services in NSW that were required to employ early childhood qualified teachers. Of these services, 52.3% were privately operated and 47.7% were non-profit.

Table A.2: Interim Approvals

Region	Area	All services	Services with interim approvals			
			Total	%	Private	Non-profit
Western	Orana Far West	23	2	8.7	1	1
	Riverina Murray	59	14	23.7	12	2
	Central West	39	1	2.6	0	1
Hunter		121	0	0.0	0	0
Southern	Illawarra	68	0	0.0	0	0
	Southern Highlands	46	2	4.3	1	1
Northern	New England	40	2	5.0	2	0
	Mid North Coast	59	9	15.3	7	2
	Far North Coast	59	16	27.1	15	1
Metro West	Blacktown	121	8	6.6	3	5
	Cumberland	68	11	16.2	10	1
	Nepean	93	5	5.4	3	2
Metro North	Northern Sydney	208	11	5.3	9	2
	Central Coast	86	10	11.6	8	2
Metro South West	South West Sydney	103	17	16.5	16	1
	Inner West	108	1	0.9	1	0
	Macarthur	83	7	8.4	5	2
Metro South East	South East Sydney	211	10	4.7	7	3
Total		1595	126	7.9	100	26

Source: NSW Department of Community Services

Notes: Of the 126 services with interim approvals until October 2003, 100 (79.4%) are privately operated and 26 (20.6%) are non-profit. The total number of interim approvals so far is 176, of which 148 (84.1%) have been granted to private services and 28 (15.9%) to non-profit services. 39 services have multiple interim approvals (up to 4). Of these 39 services, 37 are private and 2 are non-profit.

Table A.3: Complaints to the Department of Community Services about Children's Services

Region	Area	All services	Services with interim approvals	Services with interim approvals and complaints		
				Total	Private	Non-profit
Western	Orana Far West	23	2	1	1	0
	Riverina Murray	59	14	3	3	0
	Central West	39	1	0	0	0
Hunter		121	0	0	0	0
Southern	Illawarra	68	0	0	0	0
	Southern Highlands	46	2	0	0	0
Northern	New England	40	2	0	0	0
	Mid North Coast	59	9	4	4	0
	Far North Coast	59	16	10	10	0
Metro West	Blacktown	121	8	3	1	2
	Cumberland	68	11	6	5	1
	Nepean	93	5	2	2	0
Metro North	Northern Sydney	208	11	7	6	1
	Central Coast	86	10	5	4	1
Metro South West	South West Sydney	103	17	6	6	0
	Inner West	108	1	0	0	0
	Macarthur	83	7	5	5	0
Metro South East	South East Sydney	211	10	5	5	0
Total		1595	126	57	52	5

Source: NSW Department of Community Services

Notes: DoCS has received complaints about 57 services with interim approvals, or 45.2% of the 126 services with interim approvals. For comparison, in NSW there are a total of 3037 licensed early childhood services. Of these, 786 (25.9%) have had complaints against them. Of the 57 services with complaints and approvals, 52 (91.2%) are private.

Appendix B Interview Questions

CSAs

Introduction

Name, position, area/region.

Implementation

- 1) Can you describe your role in the implementation of the interim policy?
- 2) How long does it take a service to get approval under the interim policy?
- 3) How do services fill the teaching positions in the meantime?
- 4) Have you found that services have difficulties with the approval process (e.g. do they find it difficult to comply with advertising requirements)?
- 5) How do you monitor compliance with the interim policy (advertising, applications for the position)?
- 6) How do you decide on applications for multiple approvals?
- 7) What are your main considerations in granting approvals (i.e. how do you use your discretionary powers)?
- 8) In your opinion, why are privately owned centres over-represented among services with approvals?

Impact

- 9) Have there been any complaints about the interim policy?
- 10) Why do you think centres use the policy? (Do you think some centres use it to bypass regulations?)
- 11) In your opinion, what effect has the interim policy had on:
 - a) the availability of qualified staff?
 - b) the availability of children's services?
 - c) the quality of children's services?
 - d) teaching quality?
 - e) continuity of care?
- 12) Are you satisfied with the effects the policy has had?

Future options

- 13) How do you think the shortage of early childhood teachers should be addressed in the future (e.g. make the interim policy permanent, modify it, other policy ideas)?
-

Licensees

Introduction

- 1) Why did you seek approval under the interim policy? (Why, in your opinion, could you not find a qualified teacher for the position?)

Implementation

- 2) How long did the approval process take?
- 3) Were there any difficulties in the approval process?
- 4) How did you fill the teaching position in the meantime?
- 5) How much did the approval cost the service (advertising, processing applications)?

- 6) Has it been difficult to comply with the interim policy (advertising and study requirements)?
- 7) What do think about the length of the approval (12 months)?
- 8) What will happen to the approval teacher and to the position when the approval expires?
- 9) What are the approval teacher's pay, working conditions and responsibilities compared to those of qualified teachers?
- 10) What are the costs to you of supporting the approval teacher's studies?

Impact

- 11) What are the implications for other staff of employing an approval teacher (e.g. do approval teachers fulfil a supervisory role)?
- 12) What are your experiences of having an approval teacher working in a qualified teacher's position (e.g. regarding training and experience)?
- 13) In your opinion, how has the interim policy affected your children's service? What effect has it had on:
 - a) the availability of qualified staff?
 - b) the availability of children's services?
 - c) the quality of children's services?
 - d) teaching quality?
 - e) continuity of care?
- 14) Overall, are you satisfied with the interim policy?

Future options

- 15) How do you think the shortage of early childhood teachers should be addressed in the future (e.g. make the interim policy permanent, modify it, other policy ideas)?
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Approval Teachers

Introduction

- 1) How long have you been at this Centre / working in a teaching position under the ECT interim policy?

Implementation issues

- 2) Why did you seek a position under the interim policy?
- 3) What are your pay, working conditions and responsibilities (compared to pre-approval and to those of qualified teachers)?
- 4) How have you experienced
 - a) working in a teaching position?
 - b) studying part-time?
- 5) What do think about the length of the approval (12 months)?
- 6) What are your plans for when the approval expires?

Impact

- 7) In your opinion, how has the interim policy affected your children's service? What effect has it had on:
 - a) the availability of qualified staff?
 - b) the availability of children's services?
 - c) the quality of children's services?

- d) teaching quality?
- e) continuity of care?

Future Options

- 8) How do you think the shortage of early childhood teachers should be addressed in the future (e.g. make the interim policy permanent, modify it, other policy ideas)?
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Unions

Introduction

- 1) How have you been involved with the Early Childhood Teachers interim policy?

Implementation

- 2) In your experience, what are approval teachers' pay and working conditions compared to those of qualified teachers? (This includes employer support for studying.)
- 3) Are pay and working conditions different in private and non-profit centres?
- 4) What is the approval teachers' experience of
 - a) working in a teaching position?
 - b) studying part-time?
- 5) What happens to approval teachers when the approval expires?
- 6) Why do you think centres use the interim policy? (Do you think some centres use it to bypass regulations?)
- 7) In your opinion, why are private services over-represented among services with approvals?

Impact

- 8) What are the implications for other staff of employing an approval teacher? (Do they fulfil a supervisory role or do they lack training?)
- 9) In your view, how has the interim policy affected children's services? What effect has it had on:
 - a) the availability of qualified staff?
 - b) the availability of children's services?
 - c) the quality of children's services?
 - d) teaching quality?
 - e) continuity of care?
- 10) Are you satisfied with the effects the policy has had?

Future options

- 11) How do you think the shortage of early childhood teachers should be addressed in the future (e.g. make the interim policy permanent, modify it, other policy ideas)?
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Large Employers and Interest Groups

Implementation issues

- 1) Why do services seek approval under the interim policy (why do they have problems finding qualified staff)?
- 2) How long does it take a service to get approval under the interim policy?
- 3) Have you found that services have difficulties with the approval process (e.g. do they find it difficult to comply with advertising requirements)?

- 4) What are approval teachers' pay and working conditions compared to those of qualified teachers? (This includes employer support for studying.)
- 5) Are pay and working conditions different in private and non-profit centres?
- 6) What are the implications for other staff of employing an approval teacher? (e.g. are approval teachers able to fulfil a supervisory role?)
- 7) What happens to approval teachers when the approval expires?
- 8) In your opinion, why are privately owned centres over-represented among services with approvals?

Impact

- 9) Have there been any complaints about the policy?
- 10) In your view, how has the interim policy affected children's services? What effect has it had on:
 - a) the availability of qualified staff?
 - b) the availability of children's services?
 - c) the quality of children's services?
 - d) teaching quality?
 - e) continuity of care?
- 11) Overall, are you satisfied with the interim policy?

Future Options

- 12) How do you think the shortage of early childhood teachers should be addressed in the future (e.g. make the interim policy permanent, modify it, other policy ideas)?

References

- Brennan, Deborah (1998), *The Politics of Australian Child Care: Philanthropy to Feminism and Beyond*, rev. ed., Cambridge University Press, Melbourne.
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