

30 January 2023

The Hon Dr Anne Aly MP  
Federal Minister for Early Childhood Education  
Parliament of the Commonwealth of Australia  
Parliament House  
Canberra ACT 2600

Dear Minister Aly,

**Re: 77.9% of NSW-based services  
do not support ACECQA's proposal to change the notification period  
for assessment & rating to 1-5 days**

The Australian Childcare Alliance (ACA) NSW is the largest peak body representing the privately-owned early childhood education and care sector serving over 1,600 services primarily across New South Wales. Our members collectively employ over 25,000 staff and support over 125,000 families.

As a member of the Education Council, you would be aware of ACECQA's [announcement](#) in November 2022 that all state/territory regulatory authorities will change their Assessment & Rating process in 2023, in particular:

- *“a shift to a shorter notice period of 1-5 days for most assessment and rating visits”;* and
- *“Approved providers should ensure an up-to-date QIP (or Self-Assessment Working Document in NSW) is uploaded to the National Quality Agenda IT System portal or via any other jurisdiction specific submission process.”*

In the context of severe and worsening labour shortages, ACA NSW's [survey results](#) of NSW-based early childhood education and care services in particular suggest that:

- 77.9% of respondents are against ACECQA's proposal to change the notification period for A&R to 1-5 days;
- 77.92% of respondents believe this change will put more pressure on existing early childhood educators/teachers;
- 75.93% of respondents believe this change will put excessive pressure on existing early childhood educators/teachers;
- 69.23% of respondents believe this change will mean some/many staff will never be able to schedule approved leave (eg annual leave, holiday, breaks) with confidence; and
- 66.50% of respondents believe this change will push more early childhood educators/teachers to leave the sector.

And while ACECQA's proposal did include references to partial assessment and ratings of services, it did not expressly limit the change of the notification period to exclusively partial assessments.

As such, ACA NSW is extremely concerned that this proposed change will have far more negative than positive consequences for NSW-based services, educators and teachers.

We are also concerned that this announcement was made when there is [between 33.2% and 64.1% of NSW-based services who, in our opinion, are overdue](#) for assessment and ratings. In fact, 1 NSW-based long daycare service (rated Excellent) and 2 NSW-based family daycare services (rated Working Towards the NQS) have not had their assessment and rating since 2016.

In December 2022, ACA NSW did discuss our concerns with ACECQA and the NSW Department of Education.

The NSW Regulatory Authority did publicly [broadcast](#) that "... *there are no imminent changes to assessment and rating*" and assured us that they will engage firstly with the (NSW) sector through various forums in February and March 2023 as well as prior their own engagements.

ACA NSW is not aware of any other regulatory authority communique or clarification since.

Hence, with [growing media coverage](#) of NSW-based services' concerns about having adequate numbers of educators and teachers to provide the necessary education and care of children, NSW-based services are therefore right to be extremely concerned about their services' viabilities should ACECQA's announcement be implemented verbatim.

Such concerns also coincided with the NSW Productivity Commissioner's third report in December 2022, "[Evaluation of NSW-specific early childcare regulations](#)", which declared that "... *the cost of NSW maintaining requirements above the national standards equates to around \$3,000 a year for each child attending ECEC.*"

I will contact your office to ensure your receipt of our concerns and to provide any further information/clarification you may require.

Thanking you in anticipation of your consideration of ACECQA's announced proposal to change the notification period for assessment and rating.

Yours sincerely,



Chiang Lim  
CEO

encl [Survey results](#) of NSW services' views on ACECQA's proposal to change the notification period for assessment and rating to 1-5 days

[Table of services overdue](#) for assessment and rating in NSW, VIC and QLD  
(Source: [Data based on ACECQA's national register as of 12 January 2023](#))

NSW Department of Education's [broadcast](#) following ACECQA's announcement

	QUALITY RATING/LAST RATED IN	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	Overdue	%age of segment
NSW LDCs	Excellent or 7xQAs Exceeding	16	39	42	43	23	60	1	0	0	0	1,448	44.6%
	Exceeding	46	73	103	108	93	106	0	0	0	0		
	Meeting	387	415	463	468	421	24	0	0	0	0		
	Working Towards	90	79	64	64	13	3	0	0	0	0		
	Significant Improvement Required	5	0	0	0	0	0	0	0	0	0		
			544	606	672	683	550	193	1	0	0		
NSW Community Preschools	Excellent or 7xQAs Exceeding	3	25	12	42	23	13	0	0	0	0	426	56.8%
	Exceeding	7	34	17	104	30	9	0	0	0	0		
	Meeting	37	83	53	132	93	0	0	0	0	0		
	Working Towards	7	4	7	14	1	0	0	0	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			54	146	89	292	147	22	0	0	0		
NSW FDCs	Excellent or 7xQAs Exceeding	0	0	0	0	0	1	0	0	0	0	84	64.1%
	Exceeding	1	1	0	0	5	4	0	0	0	0		
	Meeting	16	8	10	8	26	1	0	0	0	0		
	Working Towards	6	5	8	12	14	3	2	0	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			23	14	18	20	45	9	2	0	0		
NSW OSHCs	Excellent or 7xQAs Exceeding	3	6	8	4	1	19	0	0	0	0	546	33.2%
	Exceeding	20	15	38	24	7	58	0	0	0	0		
	Meeting	280	276	353	211	92	14	0	0	0	0		
	Working Towards	49	46	62	41	15	2	0	0	0	0		
	Significant Improvement Required	3	0	0	0	0	0	0	0	0	0		
			355	343	461	280	115	93	0	0	0		
VIC LDCs	Excellent or 7xQAs Exceeding	47	28	6	16	26	10	3	0	0	0	921	56.7%
	Exceeding	56	26	11	38	61	25	4	0	0	0		
	Meeting	254	148	72	247	239	122	11	0	0	0		
	Working Towards	28	10	28	48	57	0	1	1	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			385	212	117	349	383	157	19	1	0		
VIC Community Preschools	Excellent or 7xQAs Exceeding	74	68	5	15	37	23	0	0	0	0	578	53.3%
	Exceeding	76	52	7	71	95	43	6	0	0	0		
	Meeting	113	72	10	102	112	41	9	1	0	0		
	Working Towards	9	5	4	9	25	0	0	0	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			272	197	26	197	269	107	15	1	0		
VIC FDCs	Excellent or 7xQAs Exceeding	0	0	0	0	0	1	0	0	0	0	62	50.8%
	Exceeding	5	1	0	0	1	2	1	0	0	0		
	Meeting	19	15	3	8	11	3	4	0	0	0		
	Working Towards	13	3	0	6	18	7	0	0	0	0		
	Significant Improvement Required	1	0	0	0	0	0	0	0	0	0		
			38	19	3	14	30	13	5	0	0		
VIC OSHCs	Excellent or 7xQAs Exceeding	8	8	3	2	1	0	0	0	0	0	703	52.9%
	Exceeding	21	14	6	27	18	10	4	1	0	0		
	Meeting	324	131	67	309	151	66	12	0	0	0		
	Working Towards	31	10	12	39	51	0	1	1	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			384	163	88	377	221	76	17	2	0		
QLD LDCs	Excellent or 7xQAs Exceeding	11	19	13	16	13	12	17	19	4	1	957	57.5%
	Exceeding	10	22	18	56	30	45	40	41	1	0		
	Meeting	180	240	117	226	150	106	84	50	1	0		
	Working Towards	29	40	8	23	12	10	7	0	1	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			230	321	156	321	205	173	148	110	7		
QLD Community Preschools	Excellent or 7xQAs Exceeding	9	35	24	20	15	10	12	24	6	0	485	60.7%
	Exceeding	18	20	9	29	36	25	20	33	11	0		
	Meeting	69	82	30	67	55	43	39	33	4	0		
	Working Towards	6	13	2	7	8	2	1	3	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			102	150	65	123	114	80	72	93	21		
QLD FDCs	Excellent or 7xQAs Exceeding	0	1	0	0	0	0	0	0	0	0	60	67.4%
	Exceeding	0	0	4	2	3	2	2	1	0	0		
	Meeting	3	13	1	10	9	7	2	0	0	0		
	Working Towards	3	4	2	4	10	5	1	0	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			6	18	7	16	22	14	5	1	0		
QLD OSHCs	Excellent or 7xQAs Exceeding	2	5	2	4	2	4	1	0	0	0	567	59.1%
	Exceeding	7	5	6	14	4	24	17	19	1	0		
	Meeting	111	131	73	116	105	80	59	48	2	0		
	Working Towards	29	21	12	22	18	13	6	0	0	0		
	Significant Improvement Required	0	0	0	0	0	0	0	0	0	0		
			149	162	93	156	129	121	83	67	3		

From: NSW Department of Education <[ECEDupdate@mailout.det.nsw.edu.au](mailto:ECEDupdate@mailout.det.nsw.edu.au)>

Date: 6 Dec 2022 3:22 pm

Subject: Changes to quality assessment and rating



## Changes to quality assessment and rating

6 December 2022

Good afternoon

ACECQA recently published information about planned national changes to how regulatory authorities (including NSW) undertake assessment and rating under the National Quality Framework, set to occur in 2023.

The NSW Regulatory Authority wants to assure you that there are no imminent changes to assessment and rating in NSW. Partial assessment and rating will be implemented slowly with an incremental rollout planned to commence from mid-April 2023. The roll out approach will further inform the most effective way to implement the changes whilst enabling the best features of a partial assessment and rating to be realised.

We acknowledge that this initiative represents change for the sector and sits alongside a range of other changes the sector is working through. To support the change process and enable more dialogue about the new partial assessment and rating approach, we will be engaging with the Early Childhood and Advisory Group (ECAG), the Aboriginal Advisory Group (AAG) and peak bodies on the NSW approach so that we can understand how to best tailor this initiative to the NSW context.

Further to this, we intend to speak with you at various forums during February and March to provide information on the NSW approach and answer any questions you may have.

**How you will be supported**

- Roadshows will be conducted by the NSW Regulatory Authority to educate the sector on the upcoming changes and how services can prepare.
- The NSW Regulatory Authority will engage with the sector through established advisory groups and peak bodies on how this will look in NSW.
- The NSW Regulatory Authority is developing an online live self-assessment and quality improvement planning portal that will facilitate services to be “always ready” for assessment and rating and support services to engage in a continuous improvement journey.
- Transparent communication will occur from the NSW Regulatory Authority to the sector throughout the implementation of the new approach.

## For more information

More information about the planned national changes is available in ACECQA's [Information Sheet: Making quality assessment and rating more effective](#).

If you have any questions about your service operation you can contact the Information and Enquiries team on 1800 619 113 or by emailing [ececd@det.nsw.edu.au](mailto:ececd@det.nsw.edu.au).

For the latest COVID-19 advice please visit the [COVID-19 guidelines for ECEC services](#).



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Sent to all services and providers.

**Our mailing address is:**  
Early Childhood Education  
105 Phillip Street  
Parramatta, NSW 2150  
Australia

