

A critical analysis of the *National Quality Framework*: Mobilising for a vision for children beyond minimum standards

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THE NATIONAL QUALITY FRAMEWORK (NQF) has been heralded by the Australian Government as a significant reform that will raise the quality of early childhood education and care (ECEC) across the country. Drawing on Foucault's (1991) conceptualisation of governmentality this article critically analyses the NQF. From this analysis we conclude that while overall, children in ECEC settings across Australia will be somewhat better off, the NQF nonetheless falls well short of its intended outcomes. Sumsion's (2006) conceptual framework for political activism in the ECEC sector is used to propose one way forward for early childhood advocates and activists to work for policy reform that may more effectively meet the Government's goal of giving children the best possible start in life. Central to our proposal is what we believe is currently lacking in early childhood policy: a bold, innovative vision for children's right to a high-quality early education.

Introduction

The election of the Rudd Labor Government in November 2007 brought the promise of a new era for early childhood education and care (ECEC) in Australia. In its provisioning for young children in the previous decade, Australia had fared poorly in international reports (OECD, 2006, 2008; UNICEF, 2008) which highlighted to the Australian Government significant barriers to nationally consistent provision of rights-based high-quality ECEC, most notably, insufficient public investment, policy fragmentation, and inadequate training and working conditions for staff. Moreover, Australia's approach to the regulation of early childhood services—individual and disparate state/territory licensing supplemented by a national accreditation system—had also drawn widespread criticism for their limited capacity to support high-quality standards and practices (Fenech, Sumsion & Goodfellow, 2006, 2008; Press, 2006; Tayler, Wills, Hayden, & Wilson, 2006).

In response to these criticisms and OECD (2006) recommendations, the Australian Government introduced a suite of reforms intended to lift ECEC quality standards and practices, and thus improve Australia's international standing and outcomes for young children. Of note was the Council of Australian Governments' (2009b) National Partnership Agreement

on the Quality Agenda for Early Childhood Education and Care. Significantly, all state and territory governments agreed to develop and implement nationally consistent approaches to ECEC. These approaches included the development of a *National Quality Framework* (NQF), applicable to formal ECEC services across the country (Commonwealth of Australia, 2008). The NQF was to comprise a national *Early Years Learning Framework* (EYLF); a streamlining of existing disparate licensing and accreditation systems; and the establishing of new nationally consistent quality standards, and a Quality Rating System, all effective January 1, 2012. Implementation of the NQF is being overseen by a newly-established national body, the Australian Children's Education and Care Quality Authority (ACECQA).

After years of advocating for reforms that would bolster the provision of quality ECEC for all children in Australia, many in the sector were 'excited and reinvigorated by the potential (of these reforms) to transform the way we educate and nurture our youngest citizens in Australia' (Cheeseman & Torr, 2009, p. 72). We shared in this excitement. As members of the Social Justice In Early Childhood (SJIEC) group we have, since 2005, had many rigorous discussions and debates at our annual conferences about how the sector could be transformed to enable universal provision of quality

ECEC. We dared to hope that the promised Reform Agenda would bring significant changes that would benefit children, families, and teachers and educators in the sector, changes that we had long advocated for.

Following the announcement of the *National Partnership Agreement*, operationalisation of the NQF progressed at a rapid pace. The EYLF was finalised in 2009 (Commonwealth of Australia, 2009) and although not legally enforceable in all states and territories, is being used to guide educators' planning, implementation and evaluation of quality early childhood programs in many centres across the country. The close of 2010 saw the passing of *The Education and Care Services National Law Act 2010* (Commonwealth of Australia, 2010a), which gave legal status to the agreement and established legislative requirements. These requirements pertain to: provider and service approvals, certified supervisors, the assessment and rating system, policies and procedures, children's health and safety, a centre's physical environment, staffing, information and records, and the establishing and roles of ACECQA. The passing of this Act was quickly followed by the release of three draft documents in 2010: the *Draft Guide to the National Quality Standard* (NQS) (DEEWR, 2010b), the *Draft Assessment and Rating Instrument* (DEEWR, 2010a), and the *Draft Self Assessment and Quality Improvement Planning Process* (DEEWR, 2010c). At the time of writing, new Education and Care Services National Regulations (Commonwealth of Australia, 2011a) were released and the NQS (Australian Children's Education and Care Quality Authority, 2011) finalised.

At the time the Quality Agenda was announced Cheeseman and Torr (2009, p. 72) cautioned that 'the reforms initiated by the current Australian Government are ambitious and will require determination and courage to implement'. Some two years on, is the NQF marked by such determination and courage? Some in the sector would agree that it is—for example, two of the sector's national peak bodies hailed the NQF as 'a considerable overhaul of the sector' (Early Childhood Australia, 2011, p. 1) and a reform to be 'celebrated' (Australian Community Children's Services, 2011). While the private sector has raised some opposition to the NQF (Bridge, 2010), this has not been on the basis that the reforms will not drive quality practice. Rather, their concerns pertain to potential fee increases and subsequent affordability and accessibility issues for families.

To inform further thinking within the sector about the NQF, in this paper we utilise Foucault's (1991) theorisation of governmentality to analyse the NQF reforms. We consider this approach important, mindful of Dean's (1999) assertion that the study of governmentality 'regards the exercise of power and authority as anything but self-evident and in need of considerable

analytical resources' (p. 9). Focusing specifically on the NQS and Draft Assessment and Rating System we examine the Australian Government's 'truth claims' about these reforms, and consider whether they will indeed give 'all children the best possible start in life' (Council of Australian Governments, 2009a, p. 4). From our analysis, and in light of research on quality ECEC, we conclude that despite some improved standards, in its current form the NQF falls markedly short of the Australian Government's stated ambitions, and of those long advocated for by the sector. Rather than be immobilised by the limited reforms, however, in the final section of the article we draw on Sumsion's (2006) framework for political activism—in particular, her concepts of 'critical imagination', 'critical literacy', and 'critical action'—to present possible future directions for advocacy and activism in ECEC.

Considering the NQF as an 'art' of the Australian Government

French philosopher Michel Foucault conceptualised 'government' as 'the conduct of conduct' (Foucault, cited in Gordon, 1991, p. 5), that is, the guiding of a population's conduct to cultivate the state's power and interests. The 'art of government' (Foucault, 1991, p. 92) are the strategies and tactics governments utilise to structure the actions of a population, whilst exercising economy (Ibid), referred to as 'governmentality'. Applying these ideas in the context of Australia's relative poor performance in investment and provisioning of quality ECEC (OECD, 2006), the incumbent Australian Government has sought to lift the country's standing in these areas and improve outcomes for children through the NQF. Ensuing reforms—outlined earlier in this paper—have been accompanied by a 'manifestation of truth(s)' (Foucault, cited in Gordon, 1991, p. 8) from the Australian Government about the NQF and the positive difference it will make to young children. Truths such as these can operate as discourses of power (Foucault, 1984 [1980]), intended to permeate a population (in this case, educators, advocates and families) and shape its thinking in ways that will serve the agenda of government. What follows is our application of these governmentality theorisations to six 'truth claims' the Australian Government has manifested, explicitly and implicitly, about the NQF. These claims are: (i) The NQF will lead to improved quality standards and practices; (ii) The NQF will drive quality improvement; (iii) Under the NQF all children will have access to quality ECEC; (iv) Robust standards can be developed in the context of market provisioning; (v) Families will be able to use NQS ratings to make more informed decisions about the centre they enrol their child in; and, (vi) Regulation is the primary way to ensure quality ECEC. We will consider how governmentality theory might inform our thinking

about each NQF truth claim, and what the implications of examining the NQF through a governmentality lens might be for future advocacy and activism.

Truth claim 1: The NQF will lead to improved quality standards and practices.

In an NQF 'Fact Sheet' for families, DEEWR (2010e) purports that 'The *National Quality Framework* will put in place compulsory, *national standards to ensure high-quality* (our emphasis) and consistent early childhood education and care across Australia. This important reform will deliver a higher standard of care for children (our emphasis) in the critical areas of education, health, and safety' (p. 1). The claims here are that the standards of the NQS will be stronger than what states and territories currently have, so strong as to support high-quality ECEC across the country. These claims are made in a document purported to detail 'facts' about the NQF to families, distributed through a modern tool of contemporary government—the World Wide Web. Our analysis of the NQS and its supporting law (Commonwealth of Australia, 2010a) and regulation (Commonwealth of Australia, 2010b), however, suggest that contrary to these claims, the NQF will deliver a system where minimum regulatory

standards are deemed to be good enough for children. We focus on proposed staffing requirements and the rating system to illustrate this point.

The staffing requirements stipulated in the NQS only modestly reflect research that clearly demonstrates the value added benefit of teacher qualifications to the provision of quality early childhood education and optimal developmental outcomes for children (Fenech, 2010; Huntsman, 2008). A recent case study exploration of six centres in New South Wales externally rated as providing high-quality ECEC (Fenech, Harrison, Press & Sumsion, 2010), for example, found that the employment of a core of university quality teachers on staff was a significant contributor to their high quality ratings. For these centres, a core of teachers provided pedagogical leadership (Siraj-Blatchford & Manni, 2007) that facilitated theoretically and philosophically informed curriculum development and reflective practice, and a learning community where mentoring, support and collaboration were undertaken in individual classrooms and across the centre. The NQF, however, stipulates that by 2014, services licensed for 25 or more children are required to have only one early childhood teacher in attendance some but not all of the time the centre is in operation (Commonwealth of Australia, 2010b).

Table 1: *National Quality Standards* for Early Childhood Teachers

No. of children in attendance	No. ECTs required by the NSW Children's Services Regulation	No. ECTs required by the NQS
< 25	0	1 20% of the time, from 1 Jan 2014
25–29	0	1 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014
30–39	1 (100% of operating hrs)	1 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014
40–59	2 (100% of operating hrs)	1 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014
60–79	3 (100% of operating hrs)	1* 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014
80	4 (100% of operating hrs)	1* 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014
> 80	4 (100% of operating hrs)	1* 6hrs/day if ≥ 50 hrs/wk OR 60% of operating hrs if < 50hrs/wk from 1 Jan 2014

* The NQS stipulates that from 1 January 2020 a second educator be in attendance when 60 or more children are in attendance. This may but need not be, a teacher, as 'another suitably qualified leader' (p. 19) is deemed to be acceptable. Moreover, for centres licensed for 60 or more children this second educator is only required to be in attendance between 30-60%, depending on the centre's operating hours.

This requirement for one early childhood teacher to be employed in every service licensed for 25 or more children is an example of a standard that exceeds most existing state and territory staffing requirements in Long Day Care, and thus constitutes an improved standard in these settings. Notwithstanding this benefit, this truth claim can, however, be contested on two counts. First is the assumption that one teacher alone will make a difference to the provision of quality education for young children. While this may well be the case, such an assumption is contrary to research (Fenech et al, 2010; Siraj-Blatchford & Manni, 2007) that shows that a core group of teachers facilitates pedagogical practice, a learning community, and staff stability, all of which enhance curriculum and relationships in early childhood settings. Second is a comparison of this requirement for one early childhood teacher with current standards in NSW (Table 1). This table clearly highlights the gap both in numbers of teachers and required hours, and appears indicative of minimum regulatory standards, not quality ECEC:

In terms of staff:child ratios, Table 2 shows that there is still a considerable gap between proposed standards and sector recommendations based on international research (Press, 2006). This is the case for infants up to 12 months, and preschool-aged children from three years of age. Like staff qualifications, proposed ratio standards do not support high quality, nor do they constitute improved standards in all states.

While proposed ratio and teacher qualification standards represent an improvement in some states and territories, the above tables suggest that they will, firstly, not signify improved standards and higher quality for all children, and certainly not at the level that research suggests supports high quality. From a governmentality perspective the exercising of economy seems pertinent

here. The Australian Government may well have opted for 'reform' that sought to improve quality standards within the confines of existing constraints: the global financial crisis; pressure from the private sector to keep costs for service providers and families down (Karvelas, 2011); and a commitment to ECEC provisions within an economic rationalist policy frame (Sumsion, 2006). While these contextual factors remain, it is difficult to envision reforms that will drive the provision of high-quality ECEC for all children.

Truth claim 2: The NQF will drive quality improvement.

A stated aim of the tiered assessment and rating system is to 'promote continuous improvement' (DEEWR, 2010d, p. 31). When prompted to elaborate on how centres would be rated as 'excellent', however, DEEWR indicated that it is likely that only approximately 100 centres across Australia will be rated as Excellent, with most centres attaining the '*National Quality Standard*' rating (ten Brummelaar, 2011). The strategic use of 'quality' language to define what we believe to be a minimum standard, could be seen to reflect the government's 'shrewd fashioning' (Dean, 1999, p. 18) of the new system in order to be seen to be improving quality. Additionally, apart from a centre's quality rating being publicly displayed on the government website, the NQF provides very little incentive or fiscal support for centres to operate beyond the basic NQS rating. It is difficult to foresee that demand from families will provide such an impetus, given families' limited understandings of what comprises quality child care (Sumsion & Goodfellow, 2009), and the potential for fees at centres rated as High Quality or Excellent to be high enough to preclude real choice for families. A system that drove quality improvement would require centres to demonstrate, through their annual

Table 2: Comparison of NQS, grandfathered and Early Childhood Australia's recommended staff:child ratios

Age of child	Proposed standards	Grandfathered standards	Early Childhood Australia's evidence-based recommendations
Birth–12 mths	1:4 Jan 1, 2012	N/A	1:3
13–24 mths	1:4 Jan 1, 2012	N/A	1:4
25–35 mths	1:5 Jan 1, 2016	Vic. = 1:4	1:5
3 years	1:11 Jan 1, 2016	NSW, SA, Tas., WA = 1:10	1:8
≥ 4 years	1:11 Jan 1, 2016	NSW, SA, Tas., WA = 1:10	1:10

improvement plan, a cumulative increase in the number of standards that meet the high quality/excellent level. This requirement would mean that over time, an increasing proportion of centres would be operating at high or excellent quality. As it stands, however, the NQF is likely to endorse most centres operating at minimum regulatory standards which is not consistent with structural elements (teacher qualifications and ratios) that research has identified contribute to quality ECEC.

Truth claim 3: Under the NQF all children will have access to quality ECEC.

Consistent with its productivity and social inclusion agendas, COAG's (2009b) stated intention is that the NQF will 'ensure all Australian children (our emphasis) can have access to quality early childhood education and care services' (A–3). The proposed system, however, does not support the equitable provision of quality ECEC for all children in Australia. First, because few centres are likely to be rated as Excellent or High Quality, only a small number of children will have access to high-quality ECEC. Second, the Federal Government's universal access program (DEEWR, no date-b)—which aims to provide all children in their year before school access to 15 hours a week (40 weeks of the year) of quality early childhood education provided by a four-year university-qualified early childhood teacher—is likely to mean that the one teacher required by the NQS will be reserved for this program. In other words, children four years of age are more likely to access a teacher-led quality early childhood education program than infants, toddlers, and three-year-old children. Third, and as illustrated by Table 2, structural standards will vary across jurisdictions, as states and territories with above NQS requirements (for example, ratios and teacher qualifications) have these requirements grandfathered.

Fourth, and as noted in the previous section, staffing requirements will vary depending on the number of places a service is licensed for. Such requirements inevitably mean that some children will have limited or no access to an early childhood teacher. Children in centres with less than 25 children, for example, may only have access to an early childhood teacher 'by means of information communication technology' (Clause 145.2). Limited access is also the case given that centres are able to calculate access to an early childhood teacher in block periods e.g., two day blocks per fortnight (DEEWR, 2010d). This option is not conducive to quality relationships or quality education for children. Should these two days be consecutive, children not attending those days may not have any access to an early childhood teacher. Conversely, rotating these days will compromise stability of staff and the learning and care experiences that will be available for children. These scenarios are not child centred and starkly contrast with the pedagogical and curriculum

approaches outlined in the EYLF (Commonwealth of Australia, 2009); the *Educators' Guide—Educators' belonging being and becoming: Educators guide to the EYLF for Australia* (Commonwealth of Australia, 2010c) and the recent nationally distributed *Reflect Respect Relate* (Department of Education and Children's Services, 2011), all of which position relationships as central to quality early childhood education.

The scenarios also highlight that not all children will have access to an early childhood teacher at all times. For reasons outlined earlier in this paper we see this as problematic, for all children and particularly for Indigenous children. Martin (2008) argues that all Indigenous children have the right to a university-qualified teacher in their educational contexts and that 'mediocrity will only ever limit opportunities for Indigenous children'. There appears to be considerable slippage between a proposed NQS that does not require an early childhood teacher for all children and other policy initiatives of the Australian Government, such as Closing the Gap in Indigenous communities (Commonwealth of Australia, 2011b).

Truth claim 4: Robust standards can be developed in the context of market provisioning.

The proposed standards appear to reflect an inherent tension between quality, affordability, and for-profit provision of ECEC. The development of the NQF has taken place within a dominant neoliberal discursive frame. From a governmentality perspective, such a frame could be interpreted as an artful tactic by the government whose discourse implies that market provision of ECEC is both given and workable. Dean (1999) argues that 'liberal ways of governing ... often conceive the freedom of the governed as a technical means of securing the ends of government' (p. 15). In the ECEC sector, 'freedom of the governed' manifests as consumer choice in market provision. As noted earlier, however, the extent of this freedom of choice, given families' limited capacity to discern quality (Sumsion & Goodfellow, 2009) results in a narrow margin in the exercise of freedom (Dean, 1999).

Additionally, a market approach to ECEC has significant implications for a government's vision for children and quality ECEC, as it renders a strong for-profit advocacy force—driven at least in part by profitability imperatives—that influences public policy (Press & Woodrow, 2005). Lobbying by the for-profit sector in NSW, for example, sought to retain 1:5 ratios for children under two years of age because of perceived cost implications (with respect to affordability and staffing) of the proposed improved 1:4 ratios (Cross Sectoral Taskforce, 2006). More recently, and in response to the NQS, similar lobbying has been undertaken by for-profit groups in the Australian media (Karvelas,

2011). This point is not to suggest that all for-profit centres do not provide and do not want quality ECEC and all not-for-profit centres do. Rather, we maintain that there is an inherent contradiction between quality and profit, and that an over-reliance on for-profit provision is likely to work against the development of robust national regulations.

Truth claim 5: Families will be able to use NQS ratings to make more informed decisions about the centre they enrol their child in.

The Australian Government's child care information website (Commonwealth of Australia, 2011c) and the assessment and rating system draft (DEEWR, 2010a) both assert that the NQF will provide families with information about a centre's provision of quality that they can use to 'make informed choices about which service is best for their child' (Commonwealth of Australia, 2011b). This assertion appears to be based on a consumerist, market model of provision and is motivated, as noted in the previous section, by the government's agenda to appear to be providing 'freedom' of choice to its citizenry. The proposed rating system will essentially indicate to families which centres are operating to minimum standards and which are not. Notwithstanding availability and affordability constraints, such limited information restricts families' capacity to make informed decisions about ECEC options for their child. Based on minimum regulatory standards the system will not, as the above truth claim suggests, act as a tool that families can trust or rely on to inform them about centre quality.

In addition, this truth claim appears to homogenise families across Australia, assuming that what is valued as 'quality' in the NQF is shared by all families and communities. This assumption is problematic for firstly, Indigenous families and communities. Not all of these families will be able to assess quality in the centres available to them due to the potential mismatch in values about quality (Atkinson, 2011; Hutchins & Frances, 2009). Families with specific needs, such as those whose children have a disability, face similar difficulties, with recent research finding that for some families, mainstream ECEC services do not adequately cater for the needs of their children (Rajkovic, Thompson & Valentine, 2010). In light of what families such as these might value as a quality ECEC service, it is unlikely that the NQS ratings will provide the information they require to make an informed choice about the centre they decide to enrol their child in.

Truth claim 6: Regulation is the primary way to ensure quality ECEC.

Governments in Australia are promoting the NQF as the cornerstone to ensuring high quality ECEC in Australia (Council of Australian Governments,

2009b). Such an assertion is grounded in a belief in the utility of regulation to support high quality. We do not dispute such an assertion. Nonetheless, applying governmentality theory to the primacy of regulatory reform suggests that this truth can also strategically deflect attention away from other key barriers to high-quality ECEC that are yet to be adequately addressed in policy. First, and as previously discussed, is the Australian Government's market-based approach to ECEC provisioning. Second is the longstanding workforce dilemma, notably attracting and retaining qualified staff (Productivity Commission, 2011). Reforms to date have focused on the former but not the latter barrier (DEEWR, no date-a). Third is DEEWR's implementation of an initiative of the previous Howard Coalition Government: to include disparate service types in the one regulatory framework. The inclusion of services whose core business and expertise range from education and/or care (LDC, preschools, family day care), and care/leisure (after school care) could be regarded as a tactic to thwart the potential for a united advocacy front at sector consultation sessions, given that what constitutes quality varies from one service type to another.

Our analysis of these six truth claims leads us to conclude that the NQF in its proposed form, lacks the 'determination and courage' (Cheeseman & Torr, 2009, p. 72) needed for a visionary system of quality assurance. We have felt deflated by what seems a lost opportunity for transforming ECEC in Australia in ways that would enhance quality and outcomes for children. Our intention, however, is not for our critique to immobilise further advocacy and activist work (Press & Skattolvel, 2007) Rather, in the remainder of this paper we draw upon Sumsion's (2008) framework for political activism to consider potential ways forward for us and other advocates of high-quality ECEC.

Where to from here?

To work for transformative ECEC reform Sumsion (2006) asserts that 'powerful and strategic alternatives to our current advocacy efforts ... (and a) shifting (of) our priorities from advocacy to activism and from policy to politics' (p. 3) is needed. 'Activism' here refers to challenging and transforming established and taken-for-granted discourses within which an issue is positioned. 'Politics' is concerned with a focus on the distribution of power, particularly when conflicting values and agendas prohibit policy consensus. To this end Sumsion (2006) proposes that activists utilise 'critical imagination, critical literacy, and critical action' (p. 1). These terms respectively refer to: conceptualising existing problems and potential solutions in alternative frames of reference; identifying privileged values and agendas and intentionally probing for 'points of

vulnerability where pressure may be applied' (p. 5); and forming strategic alliances on common points of interest with stakeholders beyond those teaching and working in ECEC. In the following sections of this paper we consider how activists might take up these tools to work for regulatory reform that reflects a vision for children that goes beyond minimum regulatory standards.

Critical imagination

One's assessment of the NQF is in part reflective of the perspective from which that assessment is made. A retrospective perspective, for example, mindful of longstanding issues in the sector such as regulatory burden and minimum staff qualification standards (Fenech et al., 2006), would view the NQF as a reform that will move the sector forward through initiatives such as streamlining regulation and accreditation and increasing the number of qualified staff. While these initiatives are likely to benefit the sector, the initiatives and the NQF are, nonetheless, still reflective of a policy frame that situates high-quality ECEC as preparation for school that some children (mostly four-year-olds) might access.

A future visionary oriented perspective, on the other hand, imagines how ECEC could be in light of children's rights and interests. Our critical imagination has led us to envision a system where operating to standards of excellence is the norm, not the exception. To this end we have long argued for ECEC policy that firstly, structurally supports all services to operate at high quality (e.g., through pay parity for early childhood teachers and operational funding that enables centres to employ a teacher in every room while ensuring that fees are affordable for families), and secondly, adopts a regulatory system that, in the context of this structural support, requires services to demonstrate ongoing improvement. In this regulatory framework, standards indicative of high-quality would be rigorous, not minimums. We also imagine that standards would encompass areas of practice that are not addressed or adequately addressed in the draft Standards (Fenech, Giugni & Bown, 2011). These areas could include:

- demonstrated practices of learning from and with Indigenous Australians, including an explicit drawing from principles of Indigenous Worldviews (Atkinson, 2008) to shape everyday practice and political activism
- collaborative research with a recognised public university, college or research institute that seeks to investigate curriculum, quality, and/or cultural practices
- research-based post graduate study
- low turnover of staff
- authentic application of all theoretical perspectives outlined in the EYLF (Commonwealth of Australia, 2009)

- innovative, democratic and critical leadership and management practices (e.g., sustainable practices, visionary strategic planning that promotes social justice and children's rights)
- activism to improve the status and standing of ECEC
- contribution to knowledge generation of professional practice, where educators share their struggles and successes in engaging in aspirational and innovative practices with the wider early childhood community (e.g., through publications, conference presentations, workshop presentations)
- participation in sustained critical curriculum communities where practice and policy reforms are rigorously discussed and debated and inform and support practice, and
- demonstrated commitment and active inclusion and access for children from backgrounds with additional needs who experience discrimination and disadvantage because of the way society is structured.

Critical literacy

Applying Foucault's theorising of governmentality to an analysis of the NQF has highlighted possible underlying values and discourses, and agendas and spin that lie behind its promotion as the way forward to ensuring quality ECEC for all children. Rather than lead to immobilisation, this critique can be strategically utilised to identify 'point(s) of vulnerability' (Sumsion, 2006) that activists can take advantage of.

One point of vulnerability centres on the tension between the provision of high-quality ECEC on the one hand, and the limited public investment / high dependence on for-profit provision on the other. Of note is DEEWR's seeming disclaimer that the NQF gives 'due consideration ... to both improvements to quality and child care affordability for families' (DEEWR, 2010d, p. 2). The issue of accessibility for families is important and affordability for families is obviously critical to children's access to high-quality early childhood education, yet it appears that the development of the NQF within existing policy frames has meant that vision for genuine quality ECEC for all children has been sacrificed. We concur with Cox (2006) who has long argued that public investment will be more effective if deployed as operational funding to centres, rather than fee subsidies to families. The missed opportunity for the NQF to drive real quality improvements, coupled with shared sector concerns about affordability for families, may provide a timely window into which collective activism for transformed public investment can occur.

A second point of vulnerability, as noted earlier, is the dependence of the NQF reforms on a qualified, stable workforce. The absence of policy to address this structural barrier to quality ECEC has seemingly posed a further impediment to the development of a robust NQF. Notwithstanding the limited impact we believe the NQF will have on the availability of nationally consistent high-quality ECEC, the NQF nonetheless provides increased impetus for the sector to lobby for structural reforms that will not just attract but also retain qualified staff so that staffing requirements can be met. Two current campaigns addressing this issue are already in force (NSW / ACT Independent Education Union, 2011; United Voice, 2011).

Critical action

Following our critique of the NQF and the ideas and strategies outlined in the critical imagination and critical literacy sections, we believe there is scope for activists of high-quality ECEC to form new strategic collaborations with stakeholders within early childhood. Families, for example, present as one relatively untapped group with whom critical action could be forged. Unlike the public school sector in which families are strong activists for quality accessible public education (Australian Council of State School Organisations, 2011), families have had relatively limited involvement in efforts to improve quality ECEC, the recent campaign in NSW to reduce staff to child ratios from 1:5 to 1:4 being a notable exception (Community Child Care Co-operative NSW, no date). To date, families have been positioned in the literature as being largely uninformed about centre quality (Fenech, Harrison & Sumsion, 2011), yet case study data from a recent Australian study showed that when centre staff proactively informed families of the complex interplay of quality contributors, these families can identify and do support investment (private and public) into the provision of high quality, not minimum standards (Fenech, Under review). Increased familial awareness about the importance of quality early childhood education may feasibly lead to families working collaboratively with educators and early childhood activists to lobby for a realised vision of high-quality ECEC for all children in Australia.

Postscript

We are just private individuals here, with no other grounds for speaking, or for speaking together, than a certain shared difficulty in enduring what is taking place ... Who appointed us, then? No one. And that is precisely what constitutes our right. (Foucault, 1994, p. 474)

Writing this article posed a dilemma for us. We considered that we were exposing ourselves as naïve idealists, lacking the pragmatism to engage in politics

and policy making. We have been wary that we may be criticised for being too critical ourselves; that we should be thankful for the progress that has been made. In the end our vision for children and quality ECEC won out. When we consider how change has been created in the world, bold vision, critical imagination and speaking out are all elements of great change. While small steps achieve small changes, a governmentality analysis shows that they can also entice us to be grateful for mediocrity (in the guise of minimum standards) and they govern us to think small, be small and maintain an oppressed status in what we would like to call our profession. We would rather step out of the binds of mediocrity and open up possibilities for people to speak out in new ways that may just generate something yet to be imagined.

We recognise and respect the achievements of activists and advocates who have been fighting for decades for more robust ECEC policy. All too often, however, we see and hear about how children's rights and best interests are not upheld in ECEC settings. Students tell us anecdotally about how poorly children are treated, and why, though they would like to, they will not practise as teachers in a prior-to-school setting when they graduate. And this is in a state that already exceeds most of the proposed NQS. For children, the ECEC workforce, and families and communities, we need more.

Conclusion

While the early childhood sector is in a period of significant reform, our analysis of the NQF suggests that the reform is not significant. The NQF falls well short of ushering in transformative change that will ensure all children in Australia have access to quality ECEC. The continued reliance on regulatory reform in the absence of much needed structural policy can only lead to cosmetic change and improvements that will lead to, at best, the meeting of regulatory minimum standards. In this context, high-quality ECEC may be provided but it will be driven by individual teachers, educators, managers and governing bodies, and not by regulatory reform. In this context, and in the interests of children's rights and wellbeing, it remains incumbent on educators and children's activists to engage in innovative activist politics and campaigns so that the promises of the Government's Quality Reform Agenda can move from rhetoric to reality.

In this paper the broad term 'family' is used to denote any person or persons who have primary care responsibilities for a child enrolled in an ECEC setting, such as biological parents, relatives, or non-familial carers/guardians.

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