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Early Childhood Education and Care
Department of Education
Level 11 1 Oxford Street
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23 June 2016

By email: Tracy.Mackey@det.nsw.edu.au
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Dear Ms Mackey

Response to Department of Education – Early Childhood Education & Care Directorate Restructure Proposal

Thank you for the opportunity to provide a formal initial response to the organisational change proposed for the Department of Education – Early Childhood Education & Care Directorate.

The PSA has received feedback from members on the proposal. Specifically, at this stage we wish to address the following matters arising from the proposal, based on feedback received:

Expression of interest for voluntary redundancy

The PSA contends that a general voluntary redundancy program via an expression of interest should be implemented prior to the commencement of a pooled assessment process. The PSA's priority is to assist members in maintaining employment, however, if affected employees wish to leave the organisation they should be identified early to assist those who wish to remain are given the best possible chance of doing so. We understand that this may cause problems if too many staff volunteer to leave; nevertheless we feel that there is value in asking for expressions of interest for voluntary redundancies prior to beginning the pooled assessment process.

As a specified example, notwithstanding other areas, it is requested that the Department recognise the changes proposed in regions and offer an EOI process for voluntary redundancy to the five non metro ROM's. We contend that this would be fair and equitable.

We refer you to the Agency Change Management Guidelines, page 8, which states, 'Agencies may consider a general voluntary program.....before any employees are declared excess.' Given that this is a significant organisational change and will require approval from the Minister, the Minister can also approve the voluntary redundancy program. When approval is obtained the redundancy program can be implemented and reimbursement sought.

Direct Appointments

The PSA contends that there are newly created proposed positions that are substantially the same as the current positions. The PSA urges the Department to identify these positions prior to requesting staff to self-match to roles and then directly appoint employees as soon as possible to minimise personal distress and to ensure operational efficiency during this process.

Long Term Temporary Officers

The PSA maintains that Long Term Temporary (LTT) officers that are in a role that is substantially vacant be treated in the same manner as permanent officers where the number of permanent officers and LTT's do not exceed the amount of available roles.

It is reported that during the road show presentation it said that temporary regional staff who are successful in obtaining an regional ongoing role will have their role grandfathered for only a two year period before the position is moved to where the business needs are identified. If the officer is competent in their role, consideration needs to be given to allow the role to be grandfathered for the duration of the officer's employment within the directorate at the location they have selected which is what is being offered to current ongoing regional staff. A loss of skill is more expensive to the government than loss of staff. We find the Department's position in this to be unequitable.

Proposed title of the Directorate

The title of the directorate is proposed to be known as the Early Childhood Education Directorate.

- ***Issue***

The responsibilities of the directorate extend beyond early childhood to school age children. These service types such as vacation care services and out of school hour's care extend beyond education and encompass care of children.

- ***Recommendation***

The title of the Directorate should remain 'Early Childhood Education and Care.'

Proposed removal of qualifications

The removal of an Early Childhood qualification for the roles of field officers to undertake assessment and rating which has been removed since the recruitment process in 2012.

- ***Issue***

Lack of knowledge of child development and complexities around philosophy based approaches such as Montessori, Steiner, key educator approach, attachment theory etc.

- ***Risk***

Increased Tier one reviews. If a field officer with no industry experience or qualifications in the Early Childhood Sector makes a recommendation of 'working towards' for an approved provider in Quality Area One particularly around Standard 1.1 and their interpretation of the implementation of the Approved Learning Framework it may be challenged. Knowledge of curriculum and theory based approaches extends beyond memorising the Framework and requires industry experience and knowledge particularly around child development and best practise.

- ***Recommendation***

That the Occupation/profession specific capability sets are included as part of the role description for Senior Field officers, and Field Officers.

Proposed direct reports

Each proposed hub coordinator will have 16 direct reports (draft role description states 15).

Each proposed manager hub operations will have 21 and 22 direct reports respectively (draft role description states 20).

- ***Issue***

The current ROM roles manage up to nine reports per team on their current grade. One person will be responsible for reviewing and approving potentially between 28 and 40 A & R reports per month.

The capabilities of Adept for this role have increased and fall within the Capability Comparison Guide of a Grade 11/12.

- **Risk**

Bottle neck and inability to process reports within the legislative timeframe for one officer.

Limited capacity to support field officers and provide timely advice on regular basis.

- **Recommendation**

Delete two proposed Manager State-wide Network-Central.

Replace these roles with four Manager Hub Operations, 11/12 (currently 9/10) who will report directly to the Director, State-wide Operations Network.

Establish six roles, four centrally and two regionally as Hub Coordinators who can triage and interface between field officers and the Manager Hub operations, review reports, delegate functions and manage compliance activities and assessment and rating, allowing opportunities for the Manager Hub Operations to facilitate and oversee the implementation of the strategic plan.

It is unnecessary for field support officers to be in the structure for administration tasks. This function is currently done by ACO's or with support from Administration assistants 1/2 as needed.

The costing for these changes will be absorbed with the elimination of two roles of Manager State-wide Network Central and the six field support officers.

Proposed Role Descriptions no reference to reliability testing.

Role description of field officer and senior field officer makes no reference to reliability testing.

- **Issue**

No reference to reliability testing annually which is facilitated by ACECQA and is incorporated into the current role of an Assessment Compliance Officer.

- **Recommendation**

Advise and include within the role descriptions that reliability testing may be a facet of the job.

Top heavy management structure and promotional opportunities

The proposal structure appears that there may be too many managers, some with only one or three reports. The question arises are there enough staff to complete front line work, rather than managing others to do this work.

Staff have been told that the focus is on providing upward opportunities for staff, however, there are no Grade 7/8's in the second columns of the PSP and RSP branches, and the project officers are Grade 5/6's on par with the graduate. Shouldn't they not be Grade 7/8's so they can mentor the graduate? It is recommended that these should be like the second column in the PIE branch.

The proposed new structure does not promote new career paths for staff in non-metro areas it has indeed reduced these by reducing the regions. The only way country staff can gain promotion is by moving to Sydney as the new roles are located in Sydney. We contend that this is not fair, nor equitable.

Erosion of working conditions

At a roadshow staff challenged the new proposal that staff can elect to work from home and use their own car. Officers are concerned the Department is eroding their working conditions with this proposal and eventually there will be no fleet cars or office locations in non-metro areas.

Technology can connect people, however, in country regional positions technology is not always available or accessible, let alone efficient. Officers can feel professionally isolated. To have an office location would provide a sense of belonging to a team, contact with colleagues for professional discussions, collaboration, and connection. Not all homes have space for a home office.

Vehicles - It has also been indicated that officers may need to use their own car to conduct the Departments business. Currently there is access to a departmental vehicle to conduct business. Not all privately owned cars are suitable for this purpose. Utilising one's own vehicle also causes security concerns.

Travel - It is anticipated that officers will not travel more than two – three hours to a service and that officer's will 'Fly in, Fly out' to more isolated communities. This is a restrictive practice and not practical in the sense that many isolated communities do not have a regular flight, or it may include catching another government department flight (e.g. medical) to provide a service to these communities. A hire car would be necessary to drive to some of the services further afield. Many of the isolated communities do not have a hire car service. Accommodation may still be required depending on the flight schedule of another government department.

When officers in regions have gone to isolated communities, two officers drive and call into a number of services on the way, and on the way back, maximising the number of services supported. The services have become familiar with these officers and developed professional supportive relationships with them. Officers have also developed a sense of the community. It would be disappointing to see these relationships discontinued.

What will be the expectation such as insurances, etc if officers are to use their own vehicles?

Working from Home

There is a requirement for a WHS assessment and possible taxation implications, if for example a room is utilised as a home office type arrangement. Employees may claim tax deductions for a percentage of utility charges and office equipment purchased including a depreciation percentage of building depreciation for the room being used as a home office amongst other matters. There may also be a capital gains implication if the residence is sold as the room being used as a home office is deemed as being used for commercial purposes. Has this been considered by the Department as complications in this matter?

Will the process be the individual officer undertaking a self-assessment of their home environment?

Will the department provide wired broadband access if wireless internet is not supported or reliable in certain areas?

Can officers be provided with the options of using a hire car which could be booked through FCM if they are working from home?

Reduction of regional areas

There are also concerns that the number of non-metro regions have been reduced, thus removing roles for non-metro managers. There are five ongoing non-metro Regional Operations Managers (ROM) in the current structure and this has been reduced to two Regional Hubs in the new structure.

Location – the location on the draft Role Descriptions all say Sydney. This does not give regional officers who want to stay in the regions confidence in remaining in their current location. There appears to be a limited career path for regional officers, unless they want to move to the city.

Issues related to Role Descriptions

Officers were informed that they would not have access to the process for determining if the draft role description and the current role description are substantially the same. Transparency of this process would be beneficial to understanding why ongoing employees are not directly matched.

How is it that in the Senior field officer Role Description it can they have a focus capability relating to Deliver Results with a focus on budget and is graded at Adept, when the 'Budget/Expenditure' contents within the Role Description has no information about a budget rather it is 'TBA'? If it is 'TBA' then how is it determined that one must be Adept at it? This same focus capability is exactly the same as the Hub Coordinator and Manager Hub Operations Grade 9\10 who currently are a ROM and have the budgetary responsibilities.

The Field Officer Grade 5/6 has a primary purpose to 'assist' with the implementation of risk based regulatory and compliance functions. What is

'assist'? Is it to go out to services with the Senior Field Officer and assist them to perform 'risk based regulatory and compliance functions', or to assist with the general workload and go out to services to independently conduct 'risk based regulatory and compliance functions', which appears to be exactly the same as the Senior Field Officer. This appears to open to abuse. It is recommended that it be considered that there be a progressive grading from Grade 5/6 to Grade 7/8 for new starting Field Officers and workload given them is dependent on their experience and qualifications.

The Grade 9/10 role descriptions have had their capabilities changed and increased to 14 adept levels. Using the Capability Comparison Guide the expectation of a Grade 9/10 adept level sits between five and ten. The same comparison guide refers to expectations of 14 adept levels to be sitting at a Grade 11/12. Has the role description of the Hub Coordinator and Manager Hub operations been incorrectly graded? The current line management for these roles has been increased significantly.

Temporary or Permanent roles unknown

What are the temporary roles on the Organisational Chart/Staff Establishment? It is not possible to comment appropriately on whether it is fair that officers who are in ongoing positions and not matched to a position then have to apply for a new role when it may be in fact a temporary role.

Job Matching

The PSA believe that consideration should be given to those who have worked in a role for over 12 months for a possible job match to that role, rather than matching them to their substantive position. Consideration should also be given to those who have taken on much more than what is reflected in their job description document. This was done to provide business improvement and continuity. Perhaps further consideration can also be made to those that have a team reporting to them, yet this is not reflected on the job description document. This information is easily accessible in ESS and could be used as part of the job matching process.

Matching to a lower grade

If an officer is not matched to their current role grade but self matches to a lower grade how does that affect their entitlements such as recreation leave, long service and sick leave since they have been on a higher grade?


Compliance and Investigations Team

The PSA has been provided with copies of feedback that were sent to the Department in respect to the Compliance and Investigations Team. Most of these issues raised were specific to that area of the Directorate and the PSA will not repeat these matters in this response as we do not wish to be duplicitous, however, we request that the matters raised be considered by the Department in the restructure proposal.

Attached is an annexure that is titled, '*Feedback Proposed Non-Executive Structure for Early Childhood Education Directorate*', that provides further detailed prescriptions in respect to Roles that the PSA endorses and forms part of this response.

Please feel to contact me via email at ptownsend@psa.asn.au to provide any feedback related to this response.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Paul Townsend', written in a cursive style.

Paul Townsend
Industrial Advocate

Feedback Proposed Non-Executive Structure for Early Childhood Education Directorate.

1. Name of the directorate

Early Childhood Education and Care better reflects responsibilities of the directorate which include caring for primary school children.

2. Draft Organisational Charts

Across the directorate except for the Statewide Operations Branch roles are graded as follows:

- Manager 11/12
- Assistant Managers 9/10 (exclude the saved SE02 role)
- Senior (various) officers 9/10

The names and grades of roles in the Statewide Operations Branch should align with other branches.

3. Role descriptions

3.1 Manager Statewide Network 11/12 x (2)

Change role name and increase number to **Manager Hub Operations Central 11/12 x (4)**.

Rationale:

- Role Manager Statewide Network does not oversee statewide operations. Structure has 2 x Manager Hub Operations roles not under the Network Managers.
- Name comparable to other 11/12 roles in organisation structure.
- The capabilities level for Hub Coordinator role is at grade 11/12; review and amend both the Manager Statewide Network and Hub Coordinator roles to create new Manager Hub Operations Central 11/12 job description.
- Each Hub manager will direct report to Director Statewide Operations Network ensuring faster, clearer and unfiltered communication.

3.2 Hub Coordinator 9/10 x (4)

Change role name to **Assistant Manager Hub Operations Central 9/10 x (4)**.

Rationale:

- The capabilities level for Hub Coordinator is at grade 11/12; review and amend job description.
- Name is comparable to other 9/10 roles in the organisation structure.
- Maintain 9/10 grade noting reduction from current 6 x ROM 9/10 positions to proposed 4 comparative roles; offset by addition of 2 x Manager 11/12 roles.
- Targets for assessment and rating and compliance work in the Sydney Metro regions in current structure are not met with lack of resources sited as a major factor.
- Proposed direct reports to new role is 15/16 exceeding current ROM position of 9 and all other 9/10 roles in the organisation structure; it is expected the Manager Hub Operations would support role.

3.3 Manager Hub Operations 9/10 x (2)

Change name and grade to **Manager Hub Operations (location) 11/12 x 2** AND create **Assistant Manager Hub Operations (location) 9/10 x 2**

Rationale:

- The capabilities level for Manager Hub Operations is at grade 11/12; review and amend job description.
- Current organisation structure has five ROM positions 9/10 in regions outside Sydney.
- There is an increase in direct reports from 9 to 21/22 for the proposed Manager Hub Operations role; exceeding all other direct reports for manager 9/10 or 11/12 roles in directorate.
- Creation of Assistant Manager Hub Operations will allow for sharing of direct reports with Manager Hub Operations reducing to possible 10/11 direct reports.
- Provides employees outside Sydney upward career path; currently not available and consistently raised in lead up discussions to the issue of proposed organisation structure.

3.4 Senior Field Officer 7/8, Field Officer 5/6, Field Support Officer 3/4

My suggestion is to change names and roles to Assessment and Compliance Officer 7/8, Assessment and Compliance Officer 5/6 and Administration Officer 3/4.

Rationale:

- Senior officer roles in other branches of the directorate and generally are graded at 9/10.
- Officer roles in other branches of the directorate and generally are graded at 5/6.

- The job description for the Field Support Officer 3/4 is essentially administrative.

Roles with authorised officer responsibilities under the National Law and Regulations should include requirement for relevant qualification and experience. Also applicants for these roles should be made aware of reliability and drift testing by ACECQA.