## NATIONAL EARLY CHILDHOOD DEVELOPMENT ALLIANCE COMMENTS ON CHILDREN'S ACT DRAFT REGULATIONS

The focus areas of the work of the National Early Childhood Development Alliance is covered in Chapters 5, 6 and 7 of the regulations.

Having studied these chapters, in our view, the regulations are very reasonable and facilitative rather than punitive. We have a few recommendations to make and these are listed below.

## Chapter 5 Partial Care

We propose the following changes:

23 (4) (a) (v) Our recommendation is that (v) be deleted. We cannot see why disciplinary policy is singled out as part of the business plan. There are many other more important policies that are not required to be part of the business plan.

25 (7) delete this clause. It is not practical to implement this especially where a partial care facility may have more than sixty (60) children.

25 (8) delete this clause. Monthly meetings are not necessary. A quarterly meeting is more reasonable.

## Chapter 6 Early Childhood Development

We propose the following changes:

32 (1) (a) Amend this qualification to include the words "or equivalent" This qualification is falling away with effect from 18 October 2008 when no more candidates may be enrolled. By 2011 this qualification will be no more. The replacement qualification is the FETC in Early Childhood Development.

## Chapter 7 Child Protection System

nil

Eric Atmore National Chairperson 21 August 2008