

Report on the Complaints on
ECEC provision (0 – 3 years)
for years 2017, 2018 and 2019
investigated by the
Directorate for Quality and
Standards in Education



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INTRODUCTION



Introduction

As from 1st July 2016, the Directorate for Quality and Standards in Education (DQSE) within the Ministry for Education and Employment (MEDE) became responsible for the external quality assurance of Child Day Care Centres (0-3yrs). To fulfil its role effectively, upon taking this responsibility, the DQSE introduced its complaints' procedure whereby anyone can lodge complaints in relation to ECEC service provision.





The role of the Directorate for Quality and Standards in Education in dealing with complaints

The DQSE is committed to ensure that childcare centres offer a high-quality service and conform to the *National Standards for Child Day Care Facilities*. The DQSE investigates complaints and considers points of contention to assure excellence in quality service, safeguard the best interests of children and promote understanding and collaboration between different stakeholders.

When a report is lodged, the DQSE takes an objective stance between the complainant and the other party involved. It points out any nonconformity with the *National Standards for Child Day Care Facilities* which may result in poor quality service, draws the attention of either part as necessary and provides guidance to assure that practices and/or policies adhere to the said standards. The DQSE presumes the collaboration of service providers and service users in following the guidelines and actions it requests. When this fails, further measures are taken, as deem fit in that circumstance, to ensure adherence to standards in the best interest of the children.

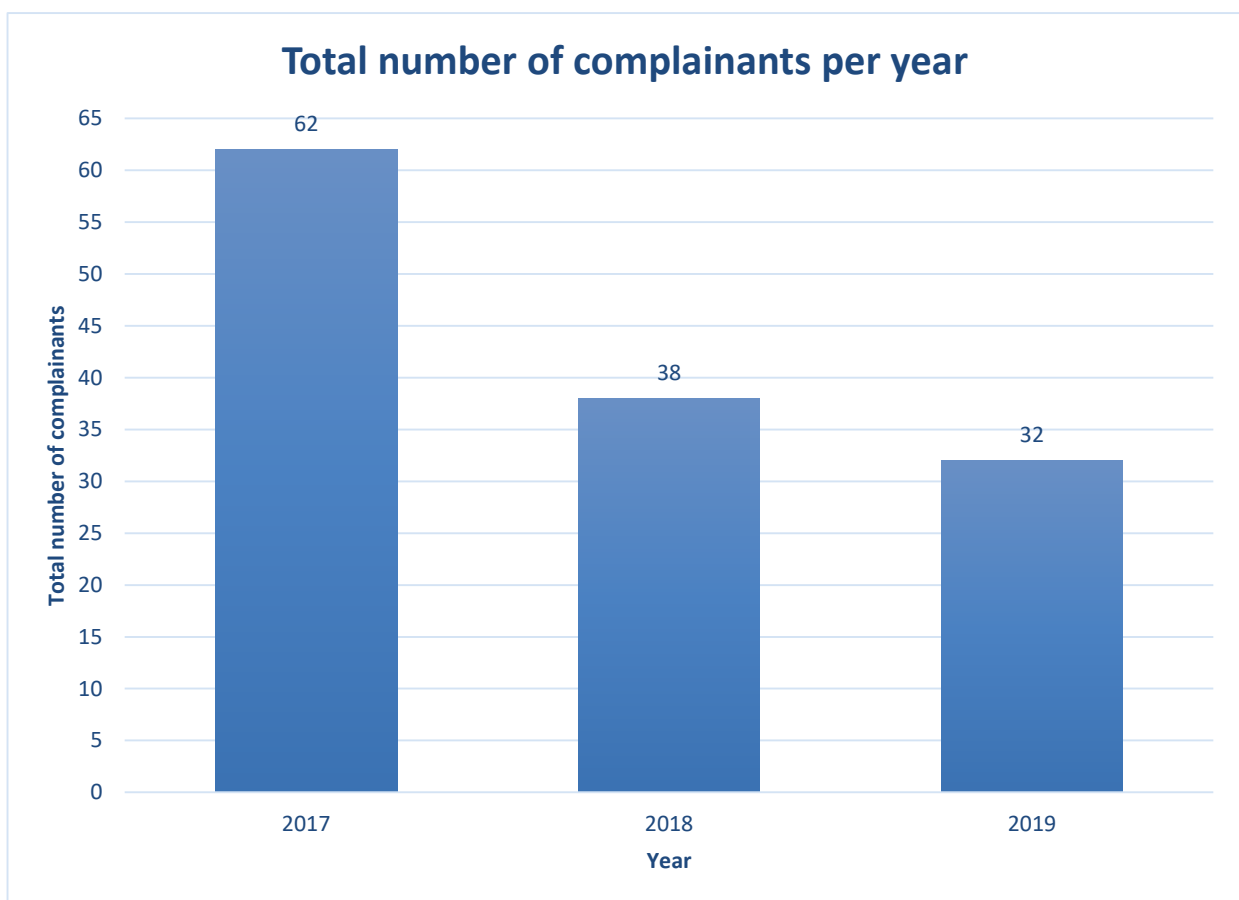
DQSE works in collaboration with the other entities (e.g. Health Department in case of spread of infections or disease) on matters that require focused expertise. The DQSE will only investigate complaints related to non-compliance with the *National Standards for Child Day Care Facilities*, issued in July 2006. When reports filed highlight grievances that fall completely outside its remit, the DQSE refers the complainant to other competent authorities.



Number of complainants filing a report with the DQSE

Over the three years 2017, 2018 and 2019, 132 complainants filed reports with the DQSE. From these 132 complainants, 126 reported objections to the service provided by 65 different childcare centres (from a total of 142 centres). A further six made enquiries on policies and procedures of a more generic nature which were not specific to one particular service provider.

Despite the increase in the demand for this type of service provision over the three-year period, as can be seen from Figure 1, there was a sharp decline in the number of complainants from 62 in 2017 to 38 in 2018. This number decreased further to 32 in 2019. The effort made by the DQSE to address all grievances or points of contention, act as mediator between the service provider and the service user, and require actions, if and when needed, may have been a determining factor in reducing the number of cases filed along the years.



The DQSE logs reports it receives through the [complaint form](#) mechanism that is available online, emails or phone calls made by the complainant. It takes

prompt action whenever a report is filed and follows these complaints on a case-by-case basis. One report filed may include more than one complaint. In fact, 29 out of 132 (22%) reports received during the three-year period (2017-2019) allege nonconformity with two or more standards. It must be stated that the statistics in this document include all cases referred to the DQSE, even those which were eventually found to be unjustified or where dropped at some stage of the investigation by the complainant.

For all cases, the official assigned by the DQSE to investigate the report contacts the complainant to ascertain the allegations and to request further information, as and if necessary. The official then consults with the complainant on issues related to data protection and anonymity. The DQSE adheres to the complainant's wish, however, it draws the attention of the complainant when the very nature of the report might compromise anonymity. Whenever it transpires that the centre management is as yet unaware of the issues and the DQSE perceives that an agreement can easily be reached between the two parties without its intervention, it encourages the complainant to consider addressing the issue at centre level first.

Any line of action by the DQSE is the result of an internal discussion involving the Director (or her delegate) and the Education Officer who had carried out external review visits at the respective centre. They refer to the external review report and any other evidence related to the case for insight. The DQSE decides on the way forward. It may seek cross-sectoral consultation with other entities and thereon proceed on an informed opinion. The complainant is further assured that the DQSE is looking into the matter as appropriate.

Courses of action are planned on a case-by-case basis. They may include unannounced visits, a meeting with the Legally Responsible Person (LRP), investigations to be carried out during an upcoming visit or any other required action. The DQSE provides the necessary guidance to the service providers. It also continues to follow the case to assure that the centre acts on its recommendations or required actions. The case is finally closed when the DQSE is satisfied that the standards are maintained at the centre and the safety and well-being of the children is ensured.



It is of particular interest to note that a small number of concerns were raised by the centres' management¹ following requests by service users to change practices or policies that, if applied would conflict with the *National Standards for Child Day Care Facilities*. For such cases the DQSE refers to the centre's Manual and Procedures² and provides guidance accordingly.



¹ 'Centre Management' refers to both the Legally Responsible Person and the centre manager.

² This document constitutes an agreed contract between the service provider and the service user. It includes the obligations of parents and the code of ethics to be followed. Review leaders evaluate the Manual of Policies and Procedures during their annual review visits and request changes when any of their content conflicts with the National Standards for Child Care Centres (2006).



Number of centres and number of reports lodged with DQSE

Following the launching of the national Free Childcare Scheme in April 2014, ECEC service provision for children under three years became more accessible. The number of registered centres in 2014 stood at 80 and rose to 115 (43.8% increase) by 2017. From 2017 to 2019 there was a further 23.5% increase in the number of registered childcare centres and by the end of 2019 there was a total of 142 registered childcare centres in operation. Table 1 below shows the number of children, aged 0 to 3 years, who benefitted from the scheme and indicates the increase in the number of service users.

Table 1: Number of children benefitting from Free Childcare Scheme from 1st April 2014 till 31st December 2019.

Year	Period	Number of children benefitting from scheme for first time	**Total number of children benefitting from the scheme.
2014	1 Apr - 31 Dec	3,856	3,856
2015	1 Jan - 31 Dec	2,843	5,852
2016	1 Jan - 31 Dec	2,767	5,335
2017	1 Jan – 31 Dec	3,025	5,939
2018	1 Jan – 31 Dec	3,343	6,737
2019	1 Jan – 31 Dec	3,579	7,341

***These figures are incremental. They include newly registered children as well as those that continue to attend from the previous year.*

Notwithstanding, the increase in both the number of registered centres and service users, a decline in the number of complainants who referred their cases to the DQSE was recorded. This reduction becomes more significant when one considers that, during external review visits in 2018, DQSE officials requested centre management to assure that the procedure to be followed, once a dispute is not settled at centre level, be well-known to all service users. Service providers were required to include in their Manual of Policies and Procedures the link to the DQSE's [complaint form](#) and to inform parents and members of staff that they can file a report with the DQSE when no solution to objections raised with the management could be reached.

Figure 2 shows that whilst in 2017 reports filed with the DQSE involved 37 different centres (32% of registered centres), the number dropped to 27 centres in 2018 (20% of registered centres) and decreased further to 23 centres by 2019 (16% of registered centres). Therefore, the percentage of

centres involved decreased by half over the three-year period from 32% to 16%.

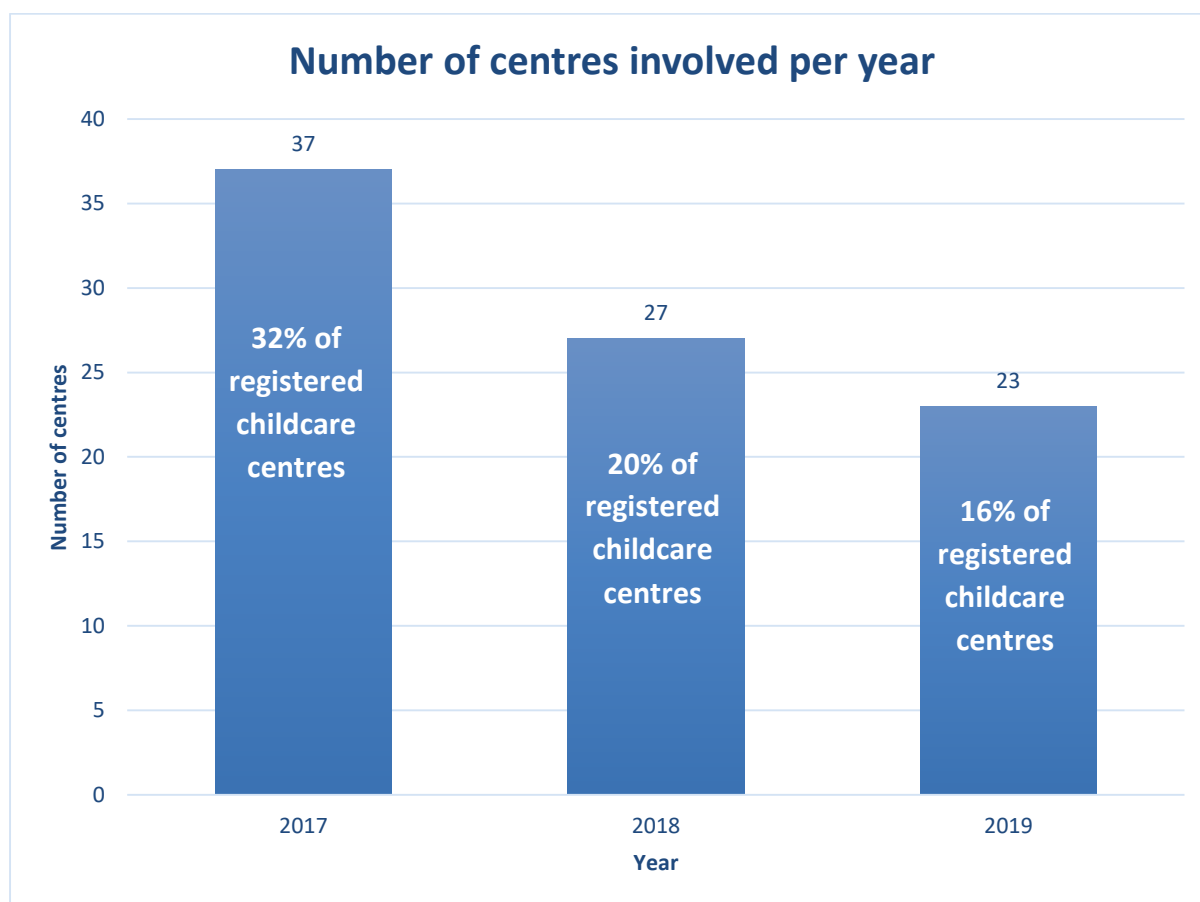


Figure 2: Bar chart showing total number of centres involved in cases referred to the DQSE for the years 2017, 2018, 2019.

Figure 3 provides information about the total number of centres over which complaints were raised in 2017, 2018 and 2019. It illustrates the number of centres with or without multiple reports referred to DQSE over the years. From a total of 65 different centres, there were 19 with registered reports in 2017 only, 15 in 2018 only and 13 in 2019 only. Complaints were lodged from users/providers of eight centres in both 2017 and 2018 and of another six centres in both 2017 and 2019. Complaints were registered in relation to four centres in all years 2017, 2018 and 2019.

Number of centres with complaints

Total 65

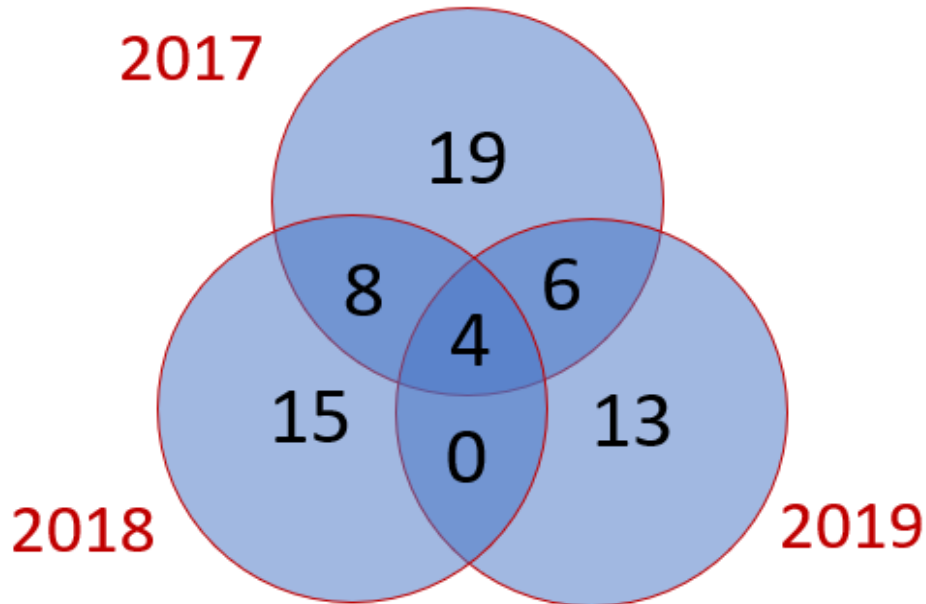


Figure 3: Venn Diagram showing the total number of centres over which complaints were raised in 2017, 2018 and 2019.

Figure 4 (overleaf) shows the number of reports filed per centre against the number of centres over the three-year period. There were 34 centres with one report each, 18 centres with two, four centres with three, six centres with four, two centres with six and one centre with eight reports.

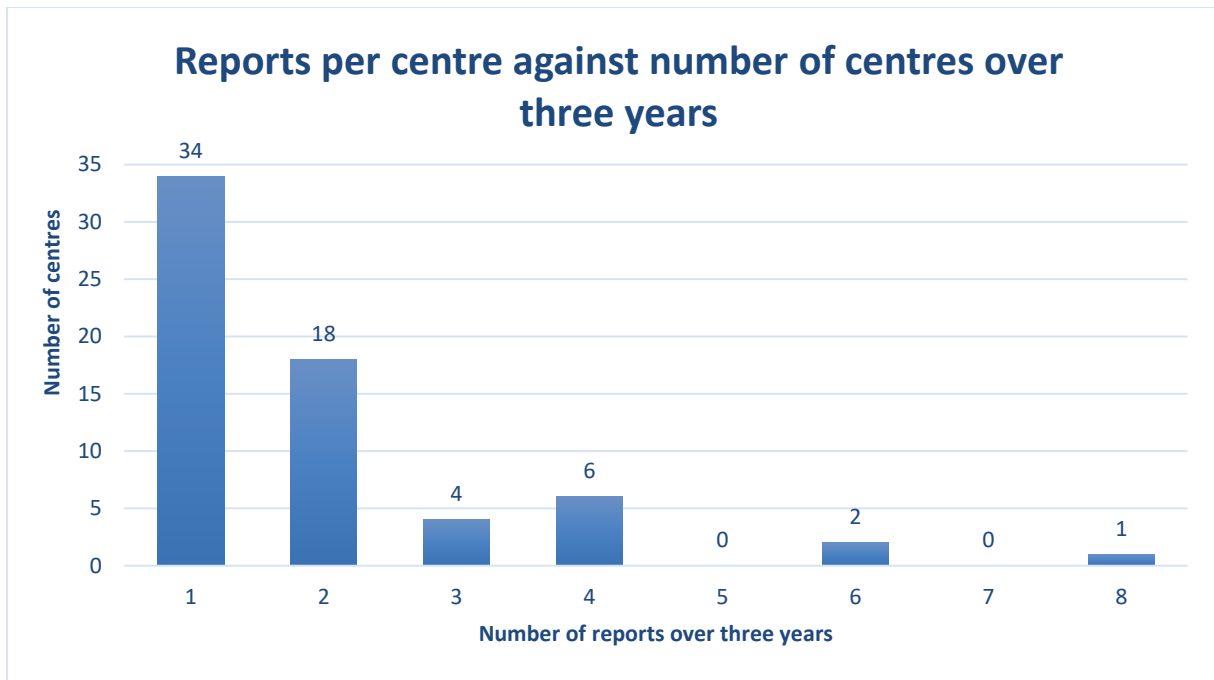


Figure 4: Bar chart showing the number of reports received per centre against the number of centres for the three-year period.

From Figure 5 (overleaf) it appears that improvement made in the service provision along the years was resulting in more satisfied service users. It details the sharp decline in the number of reports against centres and the drop in the corresponding number of reports filed for each of the three years. In 2017 there were 24 centres with one report filed, going down to 19 centres in 2018 and to 17 centres in 2019. Nine centres registered two reports in 2017, followed by seven and six centres in 2018 and 2019 respectively. Furthermore, there was a drastic reduction in the number of reports filed for the same centre. In 2017, there was one centre for which seven reports were registered with the DQSE and another two centres with four reports each. By 2019, the maximum number of reports filed for any one centre did not exceed two.

Number of reports filed per centre against number of centres

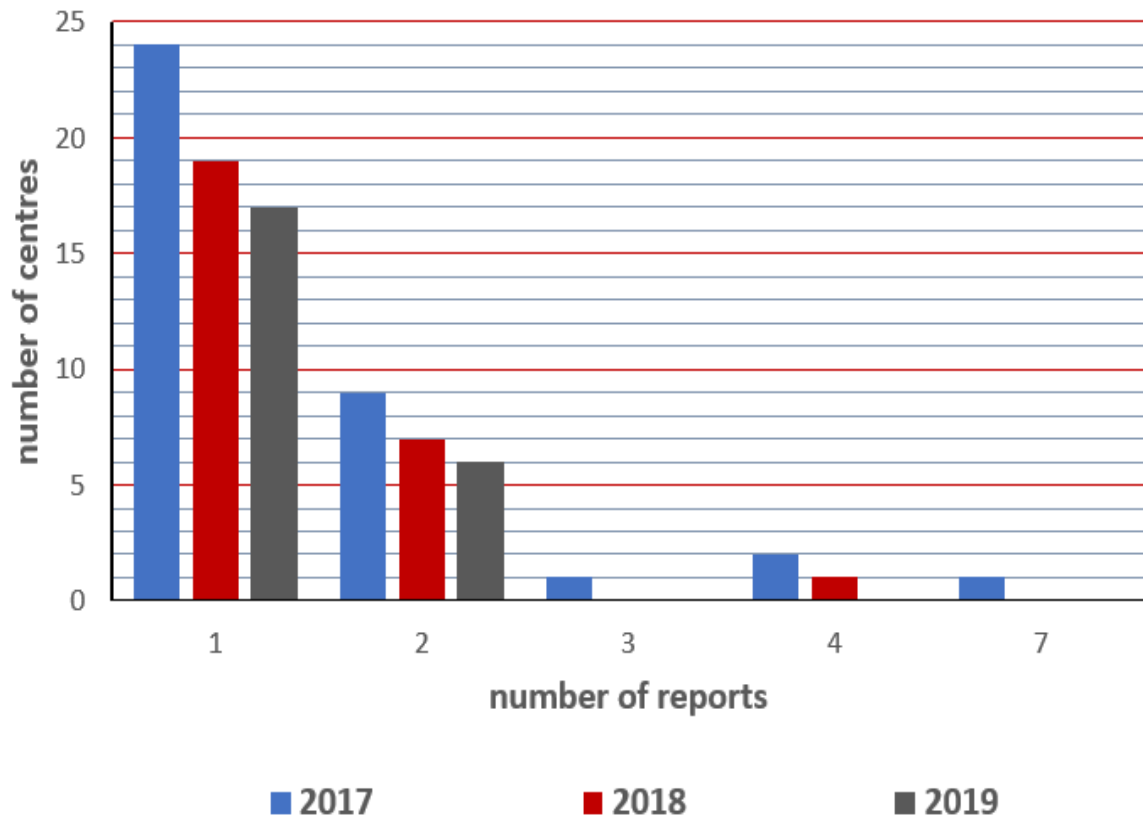


Figure 5: Bar chart showing the number of complaints received against the number of centres per year



Who were the complainants?

From the 132 reports referred to the DQSE, 92 (70%) were filed by parents and 11 (8%) by members of staff including the centre management. 24 (18%) of complainants did not divulge whether they were parents, members of staff or third parties. 5 (4%) complaints were lodged by parties that were neither service providers nor service users. This information is detailed by Figure 6.

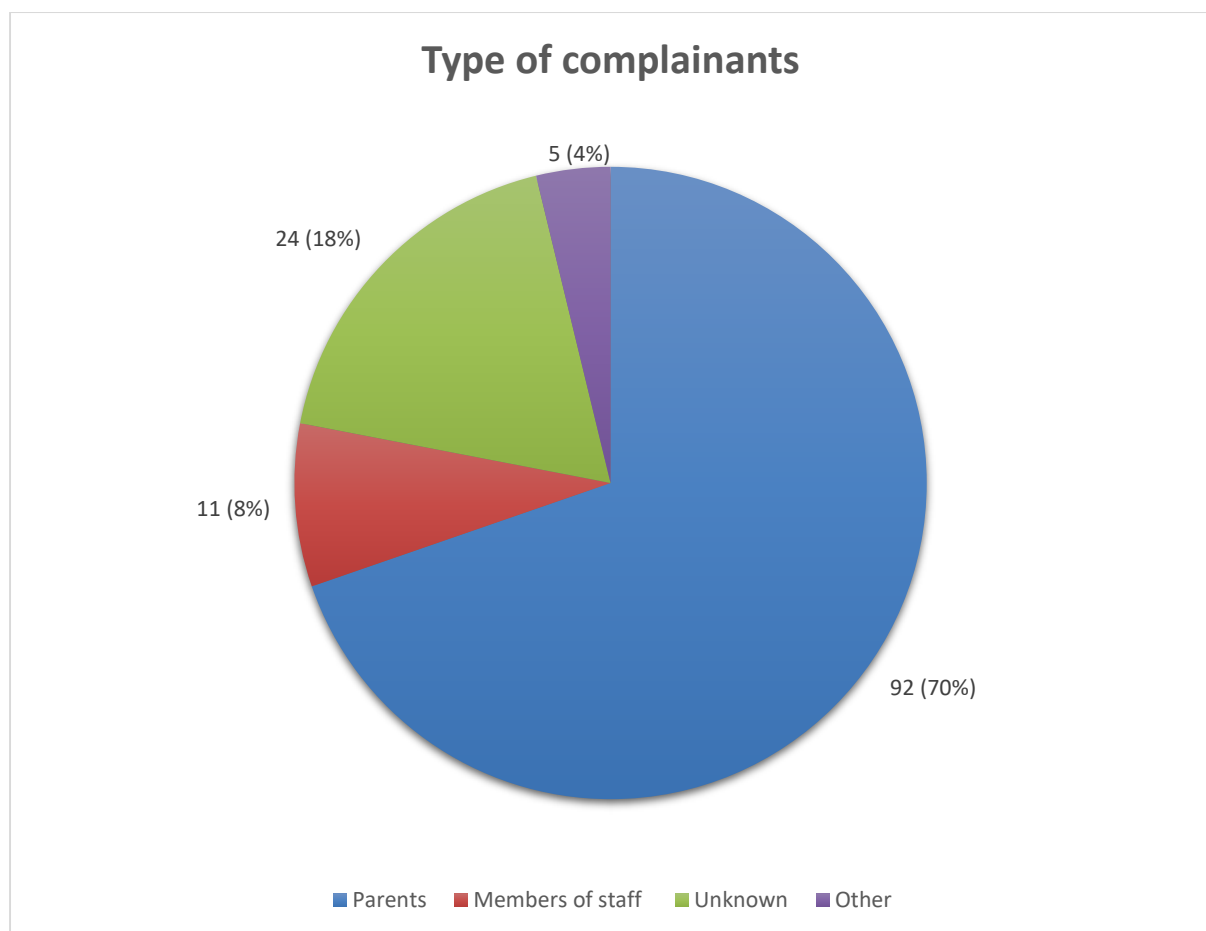


Figure 6: Type of complainants over the three-year period.

Figure 7 (overleaf) explains the distribution of complainants over the three years. An analysis of the information recorded by the DQSE reveals that the number of complainants decreased along the years from 43 in 2017 to 31 in 2018 to 18 in 2019. It is of interest to note that in 2017, 6.5% (four) reports were lodged by members of staff – three carers and one LRP. In 2018, 5.3% (two) of grievances were registered by carers and none by the centre management. However, in 2019, 15.6% (five) of all concerns were forwarded by the centre management. This may be an indication that the centre management, fully

aware of the obligations to adhere to the *National Standards for Child Day Care Facilities*, started to seek for themselves the guidance of the DQSE to solve or avoid future disputes with their service users or staff members.

Type of complainants against number of complaints

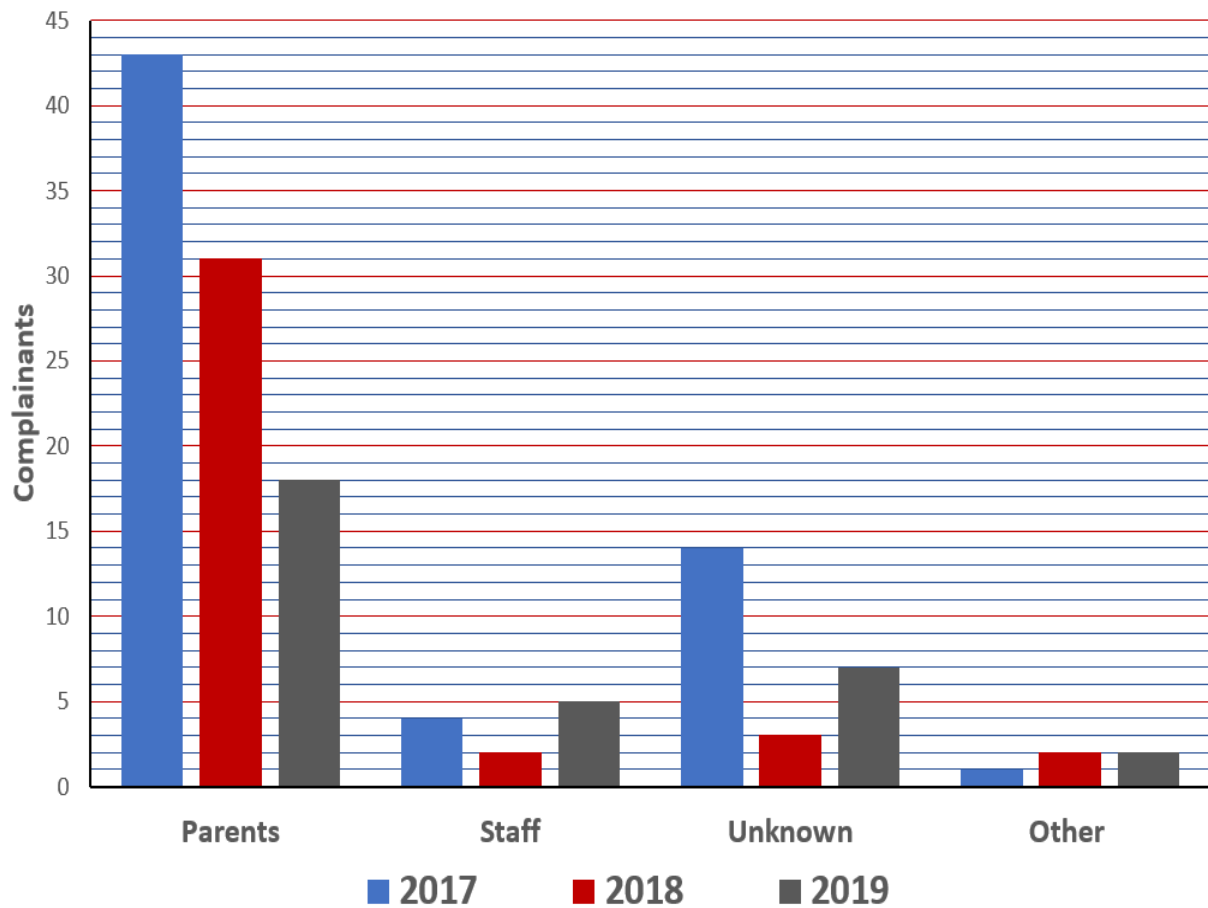


Figure 7: Bar chart showing the number of complaints raised by different types of complainants as distributed over the three-year period.



The National Standards for Child Day Care Facilities

As already mentioned, any report filed with the DQSE may highlight alleged nonconformity to more than one standard. Reports, that may include one or more issues, are lodged with the DQSE whenever a complainant, be it a member of staff, the centre management, service user or third party, feels that a practice or policy does not conform to any of the ten standards outlined in the *National Standards for Child Day Care Facilities (2006)*. The total number of complaints is therefore more than the total number of reports registered over this period.

Figure 8 (overleaf) shows a total of 165 complaints that relate to any of the ten standards. These complaints were extracted from the 132 reports filed with the DQSE over the three-year period under review. In 2017 there was a total of 77 complaints drawn out from 62 reports. The 38 reports logged in 2018 comprised 55 complaints. In 2019 the number of complaints extracted from the 32 reports filed was 33.

Number of complaints relating to each standard over three years

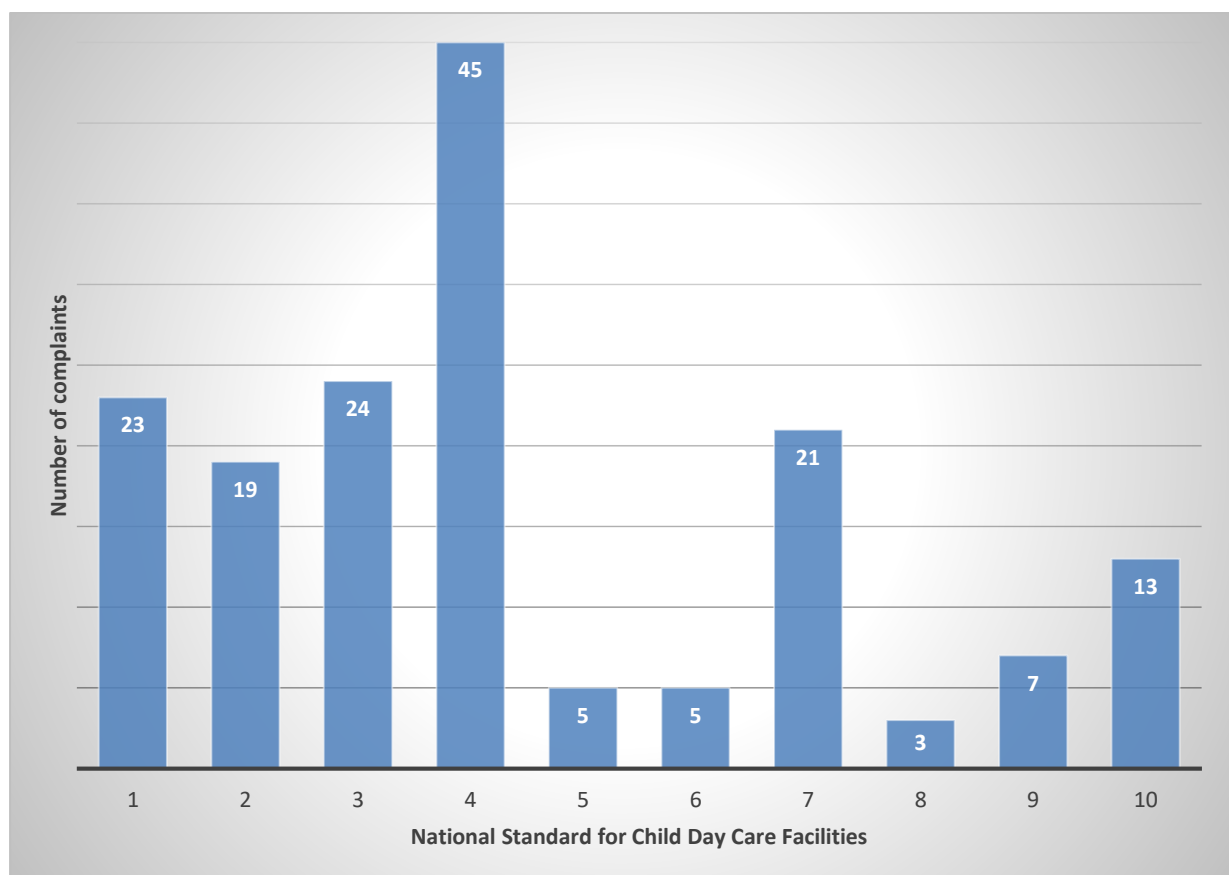


Figure 8: Bar chart showing the number of complaints highlighting nonconformities to each of the ten National Standards for Child Day Care Facilities during the three-year period 2017, 2018 and 2019.

Standard 4, which relates directly to the health and safety of children, is by far the one on which most complaints were lodged. More detailed information on the nature of complaints raised for each standard is listed in Table 2 (overleaf).

Table 2: Nature of complaints relating to each standard.

Standard	Nature of complaint	Number of complaints
1	➤ carer to child ratios not being adhered to	18
	➤ issues with staff accreditation / qualifications	4
	➤ issues with POMA clearance	1
2	➤ uncleanliness of indoor or outdoor areas	7
	➤ safety of premises	5
	➤ suitability of premises and equipment used	4
	➤ noise-level at centre	1
	➤ overcrowding	1
	➤ smoking by carers	1
3	➤ issues with children's registration and enrolment	5
	➤ disagreement with centre policies	10
	➤ issues between staff and management	3
	➤ communication with manager	1
	➤ other	5
4	➤ issues related to injuries at the centre	6
	➤ uncleanliness of parts of centre and equipment ³	11
	➤ personal hygiene	10
	➤ spread of disease	11
	➤ mosquito bites	2
	➤ misuse of highchairs and pushchairs	4
	➤ administration of medicine at the centre	1
5	➤ unresponsiveness to children's needs by carer	5
6	➤ limited communication management and parents	3
	➤ no formal reports on child's development given	1

³ The health and safety issues discussed in Standard 2 involve the overall structural environment of the centre: the building and its maintenance, the furniture, the toys and equipment being used. For Standard 4, the attention shifts to safety measures that have a direct impact on children's health: administration of medicine, safety of electrical appliances in use, injuries and injury reporting, comfort and safety of children during nap time, hygiene practices and prevention of spread of disease.

	➤ disagreement between management and parents on developmental issues	
7	➤ biting ➤ bad management of inappropriate behaviour	17 4
8	➤ alleged lack of proper treatment by carer	3
9	➤ food not being warmed properly ➤ child not being fed ➤ centre accepts or provides unhealthy food ➤ child's special dietary needs not considered	3 1 2 1
10	➤ centre not fully accessible ➤ discrimination due to impairments ➤ discrimination due to challenging behaviour ➤ discrimination following disagreement with parents	1 6 5 1

The number of complaints related to each standard decreased from 2017 to 2019 across all ten standards. This information can be found in Figure 9. In 2019, no complaints were lodged concerning nonconformity to standards 5, 8, 9 and 10. Moreover, a decrease in the number of grievances related to standards 3, 4, 6 and 7 was registered from 2018 to 2019. On the other hand, from 2018 to 2019, an increase in the number of complaints concerning non-adherence to standards 1 and 2 (suitability of persons; physical environment, premises and equipment) was recorded.



Number of complaints for each standard

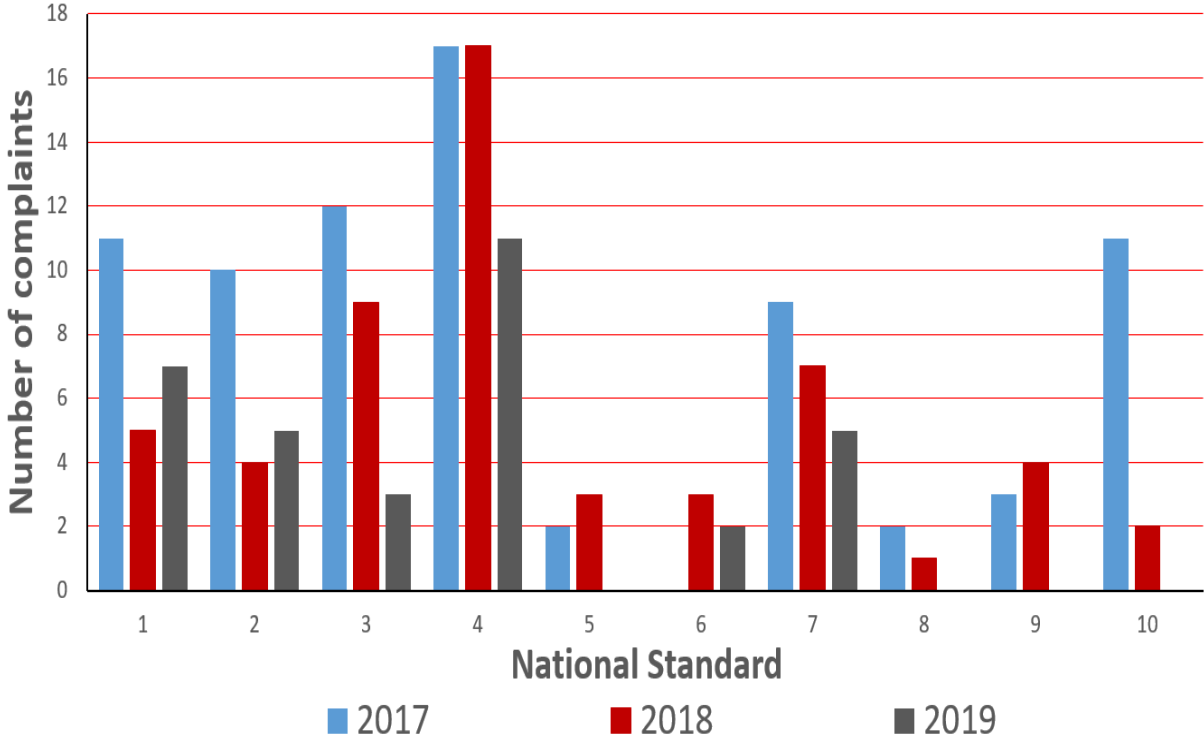


Figure 9: Bar chart showing the distribution of the number of complaints highlighting nonconformities to each of the ten national standards across the years 2017, 2018 and 2019.



CONCLUSION



Conclusion

For transparency and accountability purposes, the DQSE keeps a record of all reports and complaints it investigates.⁴ This report has been compiled following an analysis of reports filed and complaints lodged during the years 2017, 2018 and 2019. The main strengths and recommendations for a way forward are now summarized.

Strengths

- The DQSE has set up and developed an effective complaint handling system.
- The complaint system in place is an integral part of the DQSE's core mission, that is, to assure the quality and standards in education. It is fully aligned to the *National Standards for Child Day Care Facilities*.
- The DQSE promptly acknowledges and responds on complaints, following up as required.
- The DQSE values fairness. Once a complaint is lodged, the complainant is informed that the complaint is being followed and action will be taken. Also, unless the nature of the complaint requires an unannounced visit, the other party is immediately contacted, given the chance to make the necessary explanations, and, if need be, guided to take the necessary measures to resolve the issue.
- The DQSE has taken steps towards assuring that service users are aware of their right to lodge a complaint with the DQSE if they feel that any shortcoming by the centre has not been properly addressed. The link to the DQSE's [Complaint Form](#) which can be used by anyone to lodge complaints related ECEC provision is easily accessible online.
- The DQSE has started to develop a cross-sectoral approach with other local agencies, departments and institutions to guide stakeholders accordingly.

The Way Forward

- This is the first in-depth analysis of complaints since childcare centres fell under the responsibility of the DQSE in 2016. The DQSE can periodically

⁴ At all times the DQSE acts in line with the data protection requirements and with its retention policy.

carry out a similar process to identify and address any shortcomings emanating from its analysis.

- The DQSE can make use of the outcomes of this analysis since these may shed light on practices that are not easily observed during announced external reviews.
- In its internal review and prioritisation processes, the DQSE can include the outcomes of this and future analysis to address challenges in the quality assurance of the CCC service provision.
- The DQSE needs to consider providing training to officers in handling and investigating complaints lodged. Such training may include opportunities aimed at addressing conflict management, anger management, parental guidance related issues, and reconciliation techniques.
- This analysis indicates that the DQSE complaint handling system is effective. To confirm these indications the DQSE should seek feedback on its complaint handling system from all service providers and service users. Such feedback will also help identify areas that may need improvement in the complaint system so that the DQSE will continue to assure excellence in quality service, safeguard the interests of children and promote understanding and collaboration between the different stakeholders.

