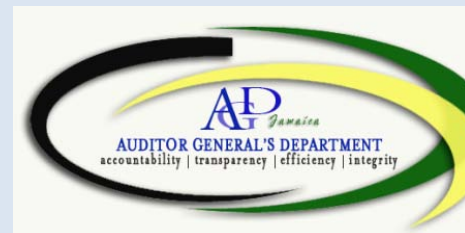


**AUDITOR GENERAL'S DEPARTMENT
ACTIVITY-BASED AUDIT REPORT
EARLY CHILDHOOD COMMISSION**

The Auditor General is appointed by the Governor General and is required by the Constitution, Financial Administration and Audit Act, other sundry acts and letters of engagement, to conduct audits at least once per year of the accounts, financial transactions, operations and financial statements of central government ministries and departments, local government agencies, statutory bodies and government companies.

The Department is headed by the Auditor General, Pamela Monroe Ellis, who submits her reports to the Speaker of the House of Representatives in accordance with Section 122 of the Constitution of Jamaica and Section 29 of the Financial and Administration and Audit Act.

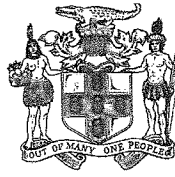
This report was prepared by the Auditor General's Department of Jamaica for presentation to the House of Representatives.



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Vision

Promoting a better country through effective audit scrutiny of Government operations.



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November 6, 2015

The Honourable Speaker
House of Representatives
Gordon House
81 Duke Street
Kingston
Jamaica

Dear Sir,

In accordance with the provision of Section 29 of the Financial Administration and Audit (FAA) Act, I have the honour to submit my report on the findings and recommendations of the Activity-based Audit on the early Childhood Commission for tabling in the House of Representatives.

Yours faithfully,



Pamela Monroe Ellis (Mrs.)
Auditor General

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Summary

The purpose of an activity-based audit is to identify opportunities to improve the activity reviewed, leading to enhanced organizational economy, efficiency and effectiveness. Therefore, the emphasis is on reporting issues affecting current performance of the activity and highlighting the benefits of implementing the recommendations put forward.

The Early Childhood Commission is an agency of the Ministry of Education and was established by the Early Childhood Commission Act of 2003. It has overall responsibility for early childhood development in all early childhood institutions, including day care centres, pre-schools, basic schools and infant schools, across the island. The Commission's mission is: *"An integrated and coordinated delivery of quality early childhood programmes and services, which provide equity and access for children zero to eight years within healthy, safe and nurturing environments"*¹.

The audit was designed to ascertain whether the Early Childhood Commission was effectively monitoring early childhood institutions to ensure satisfactory Early Childhood Development. To accomplish this objective, the audit focused on determining whether the Commission had:

- A system in place to ensure that all early childhood institutions are registered.
- Mechanisms in place to monitor effectively early childhood institutions, ensuring adherence to the terms of the Early Childhood Commission Act, Regulations and established Standards.
- A system in place to aid the transitioning of early childhood institutions with the goal of achieving the 12 legal standards as stated in the Early Childhood Commission Regulations 2005.

Paragraphs 1 to 7 outline the key findings.

Key Findings

1. **There has been no registration certificate issued to early childhood institutions in the 10 year existence of the Commission.** Consequently, there are early childhood institutions operating on perennial permits whilst others are operating on expired permits. The Early Childhood Commission requires that all early childhood institutions apply to the Commission for permission to operate. These institutions are required to be compliant with all 12 established standards in order to qualify for a registration certificate. The standards are categorised into legal and voluntary. However, ECC indicated that, after inspection, institutions that met the minimum legal standards are granted a permit to operate for one year. During this year, the early childhood institution should take steps to improve any weaknesses identified and be compliant with all the standards in order to be granted the registration certificate. The Commission's role in this process is to offer guidance and monitoring to the institutions through the Development Officers. The Commission has failed to offer adequate guidance and perform sufficient inspections to aid in the

¹ ECC Annual Report 2013-14 page 5

- transitioning of the institutions. To date, none of the early childhood institutions has been granted a registration certificate.
2. **Permits granted to early childhood institutions do not have the requisite supporting documents to validate the decision for the issuance.** The Commission provided a listing that indicated that 1,568 permits were issued during the period November 2009 to March 2015. Our analysis of the Commission's data revealed that, for the three-year period, April 2012 to March 2015, early childhood institutions were granted 467 permits. The audit found that four of our sample of 25 early childhood institutions received permits to operate without fulfilling all the legal requirements including current Medical, Fire and Public Health Reports.
 3. **The Commission has been accepting invalid police records from employees of early childhood institutions.** In February 2013, the Commission revised the internal validity period of police records for employees of early childhood institutions from one year to five years. The Commission applied this decision retroactively to police reports from 2007. Each employee of an early childhood institution is required to present a police record as proof that he/she is fit and proper, and therefore compliant with Section 3 Sub-section 3 (b) of the Early Childhood Act 2005. Our research revealed that police records issued by the Ministry of National Security are valid from the date of issue to a maximum of six months.
 4. **The Early Childhood Commission did not have established timelines for early childhood institutions to meet the established standards prior or subsequent to the granting of an operating permit.** We noted no formal communication to early childhood institutions indicating a timeline within which they should meet the required standards; however, the Commission did provide correspondences showing letters to institutions inviting them to apply for registration.
 5. **The Commission did not carry out the minimum biannual inspections as required by the Early Childhood Regulations 2005.** Section 3(a) of the Regulations requires the Commission to conduct inspections at least twice yearly for each early childhood institution. We reviewed 20 early childhood institution files and noted that only 29 of the minimum requirement of 120 Inspection Reports for the three-year period 2012/2013 to 2014/2015 were completed. In addition, the Commission did not carry out follow up procedures in a timely manner to ascertain whether the institutions met the timelines given to them to attain the legal standards. This may have contributed to instances where the conditions of early childhood institutions declined from one inspection period to the next. We noted that at March 31, 2015, there was a ratio of one Inspector to 107 institutions and one Development Officer to 64 institutions in the Commission's records.
 6. **Development Plans designed for use by the Early Childhood Commission's Development Officers in monitoring early childhood institutions were not effectively used for adequate monitoring of the institutions.** ECC has indicated that operators of early childhood institutions should prepare Development Plans with assistance and guidance from its Development Officers. However, the Commission's 2014/2015 Draft Annual Report revealed that, as at March 2015, only 875 or 32.6% of the required Development Plans were completed for the 2,678 early childhood institutions on record.

7. **There was no evidence to support the appointment of three members of staff, as the requisite qualifications were not seen on the personnel files.** Job descriptions detail the skills and educational background required for all positions within the Early Childhood Commission. However, the required qualifications were not presented for two Inspectors and a Development Officer.

Recommendations

The Early Childhood Commission and the Ministry of Education should consider adopting the following recommendations to improve the efficiency and effectiveness of the monitoring of early childhood institutions:

1. **The Early Childhood Commission should consider implementing a system or programme that commits early childhood institutions to achieving the 12 standards.** The Early Childhood Commission should require early childhood institution operators to commit to a programme aimed at achieving the Standards within a specified time, as a condition of issuing a permit to operate. It should consider or put forward a recommendation for this agreed timeline to be appended to the current standards. Additionally, the Commission should consider applying the current specified sanctions to institutions that are consistently breaching the standards. Effectively, this could lead to improvements in the operations of the institutions, full achievement of the 12 established standards and the granting of registration certificates. When issuing permits, the Commission should be mindful of expired documents and ensure it receives all updated documents.
2. **The Early Childhood Commission should immediately review the decision to extend the validity of police records from one to five years.** The five-year period is lengthy and the Commission has not introduced an alternative to validate the fit and proper status of employees of early childhood institutions. Consequently, the Commission should immediately review and discontinue the extended validity period of police records. The validity period should be in line with that of the Ministry of National Security. The Commission should enter into formal agreement with the Ministry of National Security concerning any changes to the official validity period of police records. Additionally, it should officially notify all early childhood institutions of any changes.
3. **ECC should review the current listing of registered early childhood institutions and adequately plan inspections to ensure all institutions are inspected at least twice annually.** With the current disparity in inspectors to registered institutions, the Commission will have to do critical reviews and make crucial decisions regarding inspections to be conducted. Additionally, adequate follow up should be done, and the institutions encouraged to prepare comprehensive Development Plans to guide the improvement of their operations with sufficient guidance from Development Officers.

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Part One

Introduction

1.1 This report presents the findings and conclusions of work conducted under section 25 (1f) of the Financial Administration and Audit Act.

Background

1.2 The Early Childhood Commission Act of 2003 established the Early Childhood Commission. The core focus of the Commission is the development of children from birth to age six who are enrolled in early childhood institutions, including day care centres, pre-schools, basic schools, infant schools and infant departments of primary and all age schools. The Registration Information System database of the Early Childhood Commission reflected that, as at March 31, 2015 2,678 early childhood institutions were located across the island. However, only 2,522 or 94.2 percent had applied for registration with the Commission (**Figure 1**). The Commission has indicated that there are early childhood institutions that have not submitted the necessary documentation for the registration application process to be completed.

Figure 1 Registration of early childhood institutions

Reduction in the number of registration applications from the Early Childhood Institutions in March 2015

Type of Early Childhood Institution (ECI)	Number of ECIs in Operation			Number of Registration Applications		
	March 2013	March 2014	March 2015	March 2013	March 2014	March 2015
Day Care/Nursery	89	90	84	85	82	75
GOJ Supported Day Care	12	12	12	12	12	12
Basic School	1,938	1,949	1,920	1,879	1,879	1,858
Infant Schools & Departments	130	130	136	122	124	125
Kindergarten & Preparatory School	184	187	194	157	160	165
Mixed Pre-School / Nursery School	207	228	233	191	204	206
Pre-school	91	94	90	71	72	73
Special Education School	10	10	9	8	9	8
TOTAL	2,661	2,700	2,678	2,525	2,542	2,522

Notes:

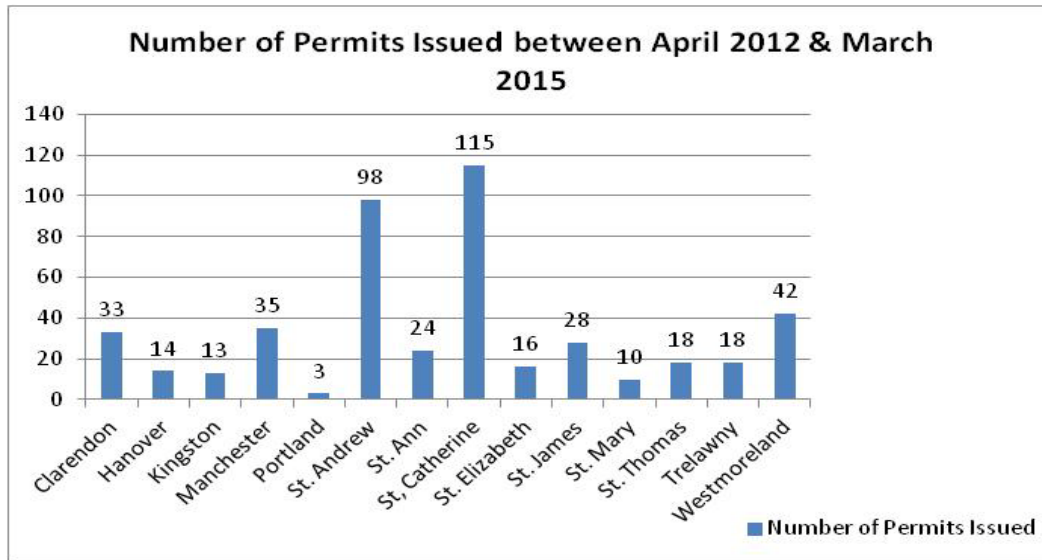
1. There were 20 less ECIs recorded by the Early Childhood Commission in March 2015 in comparison to March 2014.
2. The number of ECIs in operation and the number of applications for registration have been generally consistent over the three years.
3. Figures are cumulative at the end of each year.

Source: Early Childhood Commission

1.3 Early childhood institutions are granted a permit valid for one year after successful completion of the application process and the initial inspection of the property. For the three years ended March 31, 2015, the records of the Early Childhood Commission indicated that it issued 467 permits to early childhood institutions across Jamaica (Figure 2).

Figure 2 Number of permits issued for 2013 to 2015

The majority of permits were issued in the parishes of St. Catherine and St. Andrew



Source: AuGD’s Analysis of Early Childhood Commission data

1.4 The Early Childhood Commission has also developed a curriculum to guide early childhood practitioners and aid in standardisation of the how, why and what of care giving and education based on the philosophies of children’s development and learning. Additionally, the Commission has introduced programmes aimed at assisting parents and the wider community in the development and care of their children and encouraging them to get more involved.

Vision and Mission Statement

1.5 Vision Statement

“All children having access to high quality early childhood development services enabling the realization of their full potential”.

1.6 Mission

“An integrated and coordinated delivery of quality early childhood programmes and services, which provide equity and access for children zero to eight years within healthy, safe and nurturing environments”.²

Funding

1.7 The Government of Jamaica budgetary provision for the Early Childhood Commission over the financial years 2012/13 to 2014/15 totalled \$4.87 billion (**Figure 3**).

Figure 3 Estimates of expenditure for three financial years ended 2014/2015

Compensation of employees represents 14% of the total budget allocation.

Revised Budgeted Expenditure ³	2012/2013	2013/2014	2014/2015	TOTAL
	\$	\$	\$	\$
Grants for Community Schools	1,193,365	1,315,088	1,329,758	3,838,211
Compensation of Employees	228,208	218,074	217,936	664,218
Travel Expenses and Subsistence	57,725	47,141	47,141	152,007
Rental of Property and Machinery	7,252	7,252	7,252	21,756
Utilities and Communication Services	6,138	6,359	6,138	18,635
Use of Goods and Services	14,084	14,084	12,084	40,252
Retirement Benefits	17,701	17,701	17,701	53,103
TOTAL Recurrent	1,524,473	1,625,699	1,638,010	4,788,182
Capital B	35,000	32,000	15,000	82,000
GRAND TOTAL	1,559,473	1,657,699	1,653,010	4,870,182

Note:

1. The figures above are represented in thousands of dollars.

Source: Estimates of Expenditure

² ECC Business Plan with Procurement Plan 2013-16 page 3

³ ECC Estimates of Expenditure for 2012-13, 2013-14, 2014-15

Audit Objective

1.8 The focus of the audit was to conclude on whether the Early Childhood Commission is effectively monitoring early childhood institutions to enable satisfactory early childhood development.

Audit Scope and Methodology

1.9 We planned and conducted our audit in accordance with standards that are applicable to Performance Audits, issued by the International Organization of Supreme Audit Institutions (INTOSAI). The planning process involved gaining a thorough understanding of the operations of the Early Childhood Commission and developing an issue analysis. This analysis focused on determining whether the programmes and activities are coordinated to sufficiently monitor the early childhood institutions and thereby enable satisfactory early childhood development.

1.10 The audit was designed to determine whether the Early Childhood Commission has in place an adequate system:

- To ensure that all early childhood institutions are registered.
- To effectively monitor early childhood institutions in order to ensure adherence to the terms of their permits, Early Childhood Commission Act and Regulations and established standards.
- That provided for the transitioning of the early childhood institutions to achieve the 12 standards as stated in the Early Childhood Commission Regulations 2005.

1.11 We based our assessment on the review of internal and external documents, interviews with senior management and staff, site visits, and analysis of information provided by the Early Childhood Commission. Further details on our approach and methods can be found in **Appendix 1**.

Part Two

Weaknesses in Registering Early Childhood Institutions

2.1 In this Part, we report on our evaluation of the effectiveness of the procedures and activities that the Early Childhood Commission has in place to ensure that all early childhood institutions are registered. We considered whether:

- The Early Childhood Commission has a satisfactory system in place to identify all early childhood institutions
- All early childhood institutions are duly registered in accordance with the law; and
- There are routine monitoring activities geared towards the renewal of permits issued to early childhood institutions.

No registration certificates were issued to early childhood institutions in the 10 year existence of the Commission

2.2 The Early Childhood Commission has not issued a registration certificate to any early childhood institution on record in its over 10 years of existence. The Early Childhood Commission requires that all early childhood institutions apply to the Commission for permission to operate⁴. These institutions are then inspected and are required to be compliant with all 12 established standards⁵ in order to qualify for a registration certificate (**Appendix 2**). However, ECC indicated that institutions that met the minimum legal standards⁶ are granted a permit to operate for one year. During this time, the early childhood institution should take steps to improve any weaknesses identified and be compliant with all the standards in order to be granted a registration certificate. To date, none of the early childhood institutions has been granted a registration certificate. Consequently, there are early childhood institutions operating on perennial permits whilst others are operating on expired permits.

2.3 ECC has failed to effectively monitor and implement strategies to assist the early childhood institutions in achieving the required standards. The continued issuance of permits to institutions could result in these institutions becoming satisfied with their under-performance and position. They may therefore not take the required steps to address the weaknesses and shortfalls identified by inspectors or during self-review. Additionally, ECC has failed to sanction institutions that are in breach of the Early Childhood Commission Act and Regulations. This will compromise efforts undertaken to provide a safe and healthy environment for children, particularly in instances where institutions have been failing the standards consistently. Failure to apply relevant sanctions for identified breaches could lead to significant non-compliance with standards and no or slow growth in early childhood development.

⁴ Early Childhood Commission Act 2005, Section 3

⁵ Standards for the Operation, Management and Administration of Early Childhood Institutions, page 2 to 4

⁶ Management indicated Standard 6 – Health and Standard 8 – Safety are the minimum legal standards

Invalid police records accepted by the Early Childhood Commission

2.4 The Early Childhood Commission has been accepting invalid police records from employees of early childhood institutions. In February 2013, the Early Childhood Commission revised the internal validity period of police records for employees of early childhood institutions from one to five years. It applied this decision retroactively to police reports dated from 2007. Police records are required to be presented by each employee of an early childhood institution as proof that the employee is fit and proper and therefore compliant with Section 3 Sub-section 3 (b) of the Early Childhood Act 2005. ECC indicated that they obtained permission from the Commissioner of Police to extend the validity period of police records but no written correspondence was presented for audit scrutiny. Information received from research specified that police records issued by the Ministry of National Security are valid from the date of issue up to a maximum of six months.

2.5 Consequently, the Commission’s acceptance of the invalid document from employees of the early childhood institutions is not in line with the aim of ensuring all employees are fit and proper. This compromises the screening of employees to ensure the safe development and growth of children. Further, the absence of valid documents makes early childhood institutions ineligible for permits and makes their operations illegal.

Permits to early childhood institutions were not issued in accordance with the law

2.6 Permits granted to early childhood institutions did not have the requisite supporting documents. The Commission provided a listing that indicated that it issued 1,568 permits during the period November 2009 to March 2015. For the three-year period, April 2012 to March 2015, our analysis of the Early Childhood Commission’s data revealed that 467 permits were granted to early childhood institutions. The audit sampled 25 files and found that permits were granted to four early childhood institutions that have not fulfilled all the legal requirements (Figure 4).

Figure 4 Unsupported permits to early childhood institutions

Permits issued to four early childhood institutions with required documents outstanding

Institution Identifier	Parish	Permit Date	Expired or Unsatisfactory Documents
Institution A	Hanover	March 2013	No current Medical Report or Fire Report those seen were for the period 2008-09. Expired Food Handlers Permit
Institution B	Portland	April 2013	Unsatisfactory Fire report, Food Handlers Permit. Those stated on file were for the periods 2007-08 and 2008-09
Institution C	Westmoreland	November 2014	Unsatisfactory Public Health Report
Institution D	Kingston	April 2012	Unsatisfactory Fire Report

Source: AuGD’s analysis of Early Childhood Commission data

2.7 Permits should be issued to early childhood institutions that have met the legal requirements and have successfully completed the inspection process. The failure of the Commission to ensure that all early childhood institutions permitted to operate have submitted all required documents may prevent the management team from effectively monitoring these institutions and verifying the safe development of the island’s children. The Commission has indicated that currently, approximately 2,500 early childhood institutions are operating without a permit, including institutions that have not been issued a permit or are operating on expired permits (Figure 5).

Figure 5 Early childhood institutions operating without permit

2,494 early childhood institutions issued are operating illegally

Early Childhood Institution	Total
Institutions that have never received a permit	1,199
Institutions operating with expired permits	1,295
TOTAL	2,494

Source: AuGD’s analysis of Early Childhood Commission data

2.8 Additionally, we noted that two institutions were inspected and no permits have been issued. One institution was inspected from March 18 to 23, 2015 and the other was inspected on November 5, 2014. They received inspection reports but at the time of our site visits, no permits had been issued to them. Consequently, they have been operating on expired permits. The Commission’s management indicated that the absence of the Board of Directors has prevented the Commission from issuing permits, as the Board Chair must authorize all permits. The term of the Board ended April 2015.

No imposition of time limits for early childhood institutions to achieve established standards

2.9 The Early Childhood Commission did not have established timelines for the early childhood institutions to meet the standards prior or subsequent to the granting of an operating permit. We noted no formal communication to the Early Childhood Institutions indicating a timeline within which the institutions should meet the standards; however, the Commission did provide correspondences to institutions inviting them apply for registration.

2.10 We reviewed the established standards in other jurisdictions⁷ and found that they had imposed in the law and/or standards a period for the Early Childhood Care and Education centre operators to achieve the standards required after the grant of a temporary licence.

⁷ In New Jersey, U.S.A. a centre should not operate pursuant to temporary licenses for a period more than 18 months - New Jersey, U.S.A. Sub-Chapter 2 of Manual of Requirements for Child Care Centers page 8. Ontario, Canada gives a maximum provision of 1 year including the licensing application process that may take from six to 12 months. However, a provisional license may be issued during this time and is generally valid for up to three months whilst the regular license is valid for one year - Ontario Regulation #86 and page 11 of the Child Care Licensing in Ontario -Orientation Package. In Trinidad & Tobago, the licensing process should be completed within 5 years after completing the registration process.

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Part Three

Deficiencies in Monitoring Early Childhood Institutions

3.1 In this Part, we report on the monitoring of early childhood institutions to ensure adherence to the terms of their permits, Early Childhood Commission Act and Regulations as well as established standards. We considered whether the Early Childhood Commission:

- Has an established monitoring unit charged with conducting investigations to verify compliance;
- Effectively uses data gathered during inspections to monitor early childhood institutions;
- Follows up breaches of the Early Childhood Commission Act and Regulations and Standards to ensure they are promptly addressed.

Unsatisfactory number of inspections conducted by the Early Childhood Commission

3.2 One National Strategy of Vision 2030 Jamaica is to focus on adequate early childhood education and development as well as a satisfactory learning environment, to ensure a solid foundation is given to children that will allow for more successful transitioning into higher levels of learning⁸. Two key actions of Vision 2030 Jamaica for 2009 to 2012 were establishing health and safety standards as well as improving child health care practices and ensuring that institutions meet the health and safety standards⁹. Timely inspections should facilitate these key actions.

3.3 Section 3(a) of the Early Childhood Regulations 2005 requires inspections to be conducted at least twice yearly for each early childhood institution. However, the Commission did not carry out the minimum biannual inspections required by the Regulations. ECC indicated that the Commission does not have the number of Inspectors to conduct the required inspections. ECC also stated that there are parishes without a resident Inspector and a cap on the travelling budget has restricted travel. We noted that, at March 31, 2015, of 40 established posts there were only 25 Inspectors to cover the 2,678 early childhood institutions on record; a ratio of 1 Inspector to 107 Institutions. This negatively affected the number of inspections carried out.

3.4 We reviewed 20 early childhood institution files and noted that only 29 of the minimum requirement of 120 inspection reports for the three-year period 2012/2013 to 2014/2015 were completed (**Appendix 3**). Additionally, although the records of the Early Childhood Commission indicated that one institution applied for registration on February 10, 2014 for its new premises and we saw an inspection receipt at that institution, we saw no inspection report. ECC indicated that though some inspections are completed, inspection reports are not issued to institutions that have outstanding required documents.

⁸ Vision 2030 Jamaica – National Development Plan page 67

⁹ Vision 2030 Jamaica – National Development Plan page 265

3.5 In addition, the Commission did not perform timely and adequate follow up procedures to ensure timelines given to the Institutions to attain the required legal standards were met. The Institutions were given timelines ranging from one to 12 months to meet stipulated requirements based on inspections conducted. Review of subsequent inspections showed that the requirements were not met and remained outstanding for up to two years. We noted instances where the conditions of early childhood institutions declined from one inspection period to the next during this time lapse (**Figure 6**).

Figure 6 – Early childhood institutions showing declining statuses

Four institutions showed declining status over the audit period April 1, 2012 to March 31, 2015

Early Childhood Institution	Inspection Report date	Declined Status
Institution A	6-Jun-12	Standard 5 (Indoor and Outdoor Equipment, Furnishing and Supplies) was not an issue in 2012 but was in need of significant improvement in 2014. Standard 1 (Staffing) and 7 (Nutrition) have gotten worse their status have both declined from ‘significant’ to ‘critical’.
Institution B	11-Sep-12	Standard 6 (Health) declined from ‘improvement needed’ in 2013 to ‘significant’ in 2015.
Institution C	12-Sep-12	Standard 6 and 1 declined from ‘in need of improvement’ in 2012 to ‘significant’ in 2014.
Institution D	15-May-12	Standard 9 (Child Rights Child Protection and Equality) declined from ‘significant’ in 2012 to ‘critical’ in 2013.

Source: AuGD’s analysis of ECC’s ECIs Inspection Reports Data

3.6 Failure of ECC to monitor early childhood institutions for adoption and implementation of the established standards could result in these institutions operating with poor health, safety and other development standards. This may lead to weak early childhood development and poor transitioning into higher levels of learning. Consequently, the ECC would not effectively contribute the achievement of the National Outcomes of Vision 2030.

Development Plans are not effectively used by the early childhood institutions

3.7 ECC has indicated that operators of early childhood institutions should prepare Development Plans with assistance and guidance from Development Officers. The Plans should include information indicating the Standard(s) or priority area(s) requiring attention, the person responsible for ensuring the implementation, the expected results and the expected timeline in which the standard(s) should be achieved. However, the Commission’s 2014/2015 Draft Annual Report revealed that as at March 2015 only 875 or 32.6 percent of the required Development Plans were completed for the 2,678 early childhood institutions on record.

3.8 We examined 20 Development Plans to ascertain the follow up actions carried out by the early childhood institutions for Legal Standards noted as significant and critical in the respective inspection reports. In general, we noted that the Development Plans examined were not properly completed, they had no implementation date, no information was included for specific priority

areas and the status of work done was incomplete. Failure to include all critical information inhibits the development process, as ECC will be unable to monitor the achievement of targets against specified completion dates. ECC indicated that incomplete Development Plans should be returned to the institutions for further assessment and updates. However, a new timeframe for achieving the outstanding targets would have to be included in the Plan. ECC further stated that the inconsistencies in the Development Plans resulted from inadequate monitoring by the Development Officers that was due to insufficient staffing at the Commission. We noted that, at March 31, 2015, of 70 established posts there were only 42 Development Officers to cover the 2,678 early childhood institutions in the Commission’s records; a ratio of 1 Development Officer to 64 Institutions.

3.9 ECC’s failure to monitor adequately the early childhood institutions could contribute to further breakdown in their operations, leading to the mandate of early childhood development not being achieved. Our site visits conducted at four early childhood institutions indicated adverse conditions at two of them. One institution had significant health and safety issues as the premises and play area were in need of great improvement whilst the other showed signs of overcrowding as well as safety issues in the play area. These could be very detrimental to the safety and development of the children. In addition, the principal of one early childhood institution has been at the location for approximately one year and was not aware of the Early Childhood Commission’s requirements contained in the Standard Manual provided to all early childhood institutions.

Some field staff do not have the requisite qualifications for jobs assigned

3.10 There was no evidence to support the ECC’s appointment of three members of its field staff, as the requisite qualifications were not seen on the personnel files. Job descriptions detail the required skills and educational background for all positions within the Early Childhood Commission. However, of our sample of ten Inspectors and ten Development Officers, the required qualifications were not presented for two Inspectors and a Development Officer (**Figure 7**).

3.11 Failure to appoint employees with the requisite qualifications in accordance with the approved job descriptions may prevent the Commission from achieving its mandate. Additionally, the achievement of the Early Childhood Commission’s National Strategic Plan targets may be hindered if the Commission does not recruit and appoint qualified staff.

Figure 7 – Employees appointed without requisite qualifications

Three officers appointed without documentary evidence of the requisite qualification

Position	Minimum required education and experience	Requisite qualification not seen
Inspector	BSc. in Early Childhood Development, Education, Social Sciences or a related discipline	Bachelor of Science
Senior Inspector	MSc. in Early Childhood Development, Education, Social Sciences or a related discipline	Master of Science Degree
Development Officer	BSc. In Early Childhood Development, Education, Social Sciences or a related discipline	Bachelor of Arts

Source: AuGD’s compilation of the Commission’s job descriptions and personal file data

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Appendices

Appendix 1 - About the audit

Purpose and Authority of the Audit

We planned and conducted this performance audit in accordance with the Government Auditing Standards, which are applicable to Performance Audit and issued by the International Organization of Supreme Audit Institutions (INTOSAI). Performance audits provide objective analysis so management and those charged with governance and oversight can use the information to improve performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.

The purpose of this report is to provide our analysis, findings, and recommendations regarding our review of whether the Early Childhood Commission is effectively monitoring the Early Childhood Institutions in order to improve Early Childhood Development. The planning process involved gaining a thorough understanding of the various factors that influence the adequacy and effectiveness of the monitoring of the entity and using our issue analysis to determine the scope of the audit.

Audit Scope

We conducted this audit to answer the following questions:

- i. Is the Early Childhood Commission ensuring that all early childhood institutions are registered?
- ii. Is Early Childhood Commission effectively monitoring early childhood institutions to ensure adherence to the terms of their permits Early Childhood Commission Act, Regulations and established standards?
- iii. Did the Early Childhood Commission have a system in place to aid the early childhood institutions in the transitioning process to achieve the 12 standards as stated in the Early Childhood Commission Regulations 2005?

As a means of answering the above questions, we reviewed the Regulations and Monitoring and Support Services Units' Manuals and the Inspectors' Guide to Inspection, which details the monitoring process in place at the entity. We also reviewed a sample of the Inspection Reports produced by the Inspectors and Development Plans produced by the Development Officers and tested a sample of travel expenses for the period April 1, 2012 to March 31, 2015. Additionally, we visited four early childhood institutions and discussed the activities and operations. The audit period for which all information was collected and reviewed was April 2012 to March 2015. In certain instances, we reviewed additional information, in part to verify issues noted during the audit. We conducted the audit fieldwork in July 2015.

Audit approach

We acquired subject matter expertise by:

- Interviewing senior staff involved in the registration, inspection and monitoring of early childhood institutions.
- Interviewing an Inspection Officer.
- Visiting four early childhood institutions and interviewing the Operator/Administrators/Principal.
- Interviewing Customer Service Supervisor and Customer Service Representative.
- Reviewing, Early Childhood Commission Act and Regulations including the 12 standards, Annual Reports, Corporate Plans and Business Plans.
- Physical examination of Inspection Kit.
- Reviewing a sample of personnel records.
- Reviewing a sample of expense vouchers and supports.
- Analysing travel expense data.

We also researched the regulations of early childhood institutions in the jurisdictions listed below to identify best practice methodologies.

- New Jersey, United States of America;
- Trinidad & Tobago;
- Ontario, Canada.

We visited four early childhood institutions during the period July 21 to 22, 2015. We observed operations, examined documents and conducted interviews.

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Appendix 2 - Standards for Early Childhood Institutions

Standard 1: STAFF

The staff at early childhood institutions has the training, knowledge, skills, and attitude to help children achieve their full potential.

Standard 2: PROGRAMMES

Early childhood institutions have comprehensive programmes designed to meet the language, physical, cognitive, creative, socio-emotional and school readiness needs of children.

Standard 3: BEHAVIOUR MANAGEMENT

Early childhood staff has the training, knowledge, skills and attitude to promote positive behaviours in children.

Standard 4: PHYSICAL ENVIRONMENT

Early childhood institutions have physical environments that meet building, health and safety requirements and allow adequate space for children.

Standard 5: EQUIPMENT & FURNISHING

Early childhood institutions have indoor and outdoor equipment and furnishings that are safe, child-friendly and promote optimal development of children.

Standard 6: HEALTH

Early childhood institutions have physical facilities, policies, programmes and procedures that promote healthy lifestyles and protect children and staff from illness.

Standard 7: NUTRITION

Early childhood institutions provide children in their care with nutritious meals and model good nutritional practices for children and families.

Standard 8: SAFETY

Early childhood institutions provide safe indoor and outdoor environments for children, staff, stakeholders and visitors to the institution.

Standard 9: CHILD RIGHTS, CHILD PROTECTION AND EQUALITY

Early childhood institutions uphold the rights of children, protect them from harm and ensure that all children have equal access to services.

Standard 10: PARENT AND STAKEHOLDER PARTICIPATION

The Management and staff of early childhood institutions have good relationships with parents, caregivers, family members and the community.

Standard 11: Administration

Early childhood institutions have a management structure that ensures good administration. There are policies, procedures and programmes that ensure child, family and staff well-being.

Standard 12: FINANCE

Early childhood institutions have sound financial practices and adhere to standard accounting principles.

Appendix 3 - Inspections Conducted from 2012/2013 to 2014/2015 for 20 Early Childhood Institutions

The table shows that only 29 Inspections were done for 20 early childhood institutions for the period April 1, 2012 to March 31, 2015.

Name of Early Childhood Institution	Parish	Date of Inspection	Year of Inspection
Institution A	St. Catherine	22-Oct-12	2012-13
Institution B	St. Catherine	6-Jun-12	2012-13
		27-May-14	2014-15
Institution C	Kingston	12-Nov-12	2012-13
		15-Apr-14	2014-15
Institution D	St. Andrew	11-Sep-12	2012-13
		28-Nov-13	2013-14
		26-Jan-15	2014-15
Institution E	Clarendon	12-Sep-12	2012-13
			2014-15
Institution F	Manchester	17-Oct-12	2012-13
Institution G	St. Catherine	18-Apr-12	2012-13
		12-Nov-14	2014-15
Institution H	St. Elizabeth	13-Jun-12	2012-13
Institution I	Manchester	15-May-12	2012-13
		2-Dec-13	2013-14
Institution J	St. Thomas	1-May-12	2012-13
		3-Jun-14	2014-15
Institution K	St. Ann	21-Nov-12	2012-13
Institution L	St. Elizabeth	18-Jun-12	2012-13
Institution M	St. James	2-Nov-12	2012-13
		2-Apr-14	2014-15
		16-Mar-15	2014-15
Institution N	Westmoreland	22-Oct-12	2012-13
Institution O	St. Mary	17-Oct-13	2012-13
Institution P	St. Andrew	29-Apr-14	2014-15
Institution Q	St. Andrew	5-Nov-14	2014-15
Institution R	St. Andrew	22-Jan-14	2013-14
Institution S	St. Andrew	8-Jan-13	2012-13
Institution T	St. Andrew	N/A	None

Source: AuGD compilation of ECC's ECIs Inspection Reports Data