



### The Institute of Early Childhood

The Institute of Early Childhood (IEC), Macquarie University, is a leading Australian research and teaching institution for early childhood education. As a multidisciplinary department, academic staff have expertise in early childhood education, leadership and management, difference and disability, psychology, linguistics, sociology and creative arts. For over 100 years the IEC has been a major provider of early childhood teacher education and currently offers undergraduate and postgraduate coursework programs, and higher degrees by research. The IEC is committed to maximising opportunities for young children, families and communities through research, teaching, learning and advocacy.

### This Submission

The IEC welcomes the opportunity to comment on the Productivity Commission's *Childcare and Early Childhood Learning Draft Report*.

On August 26, 2014 the IEC hosted '*Giving Children the Best Start in Life*', a sector wide forum held at Macquarie University to consider the Productivity Commission's Draft Report of Child Care and Early Childhood Learning. Forum participants included academics from six universities with undergraduate and postgraduate early childhood teaching courses, the providers delivering the majority of education and care to children in NSW, all NSW peak education and care organisations, and the unions with most of the coverage of the education and care workforce in NSW.

The IEC reiterates the view of Forum participants, that a number of the report's premises are problematic and require redressing:

- 1) *That recommendations have been made with due regard to available evidence.* We believe that a substantial body of research pertaining to contributors to quality early childhood education has been ignored and some research findings misappropriated.
- 2) *That the proposed recommendations will still provide minimum standards of quality care and education for young children.* It is our view that the proposed weakened standards will significantly compromise children's wellbeing, learning and development.
- 3) *That the sector generally considers meeting current ratio and staffing qualifications a burden.* This view contradicts a robust body of research that highlights ratios and qualifications as predictors of quality in early childhood education programs for children birth to school age. Forum participants welcome and strongly support such requirements.
- 4) *That significant changes should be made to the National Quality Framework before a full roll out.* A subsequent review would be more informative, particularly as much of the sector



would be operating beyond the initial NQF transition period and thus be in a position to reassess perceived red tape / regulatory burden. We also consider that greater transparency and mining of NQS and ECE census data is needed to inform more evidence-based policies pertaining to the NQF.

- 5) *That only children 3- 5 years benefit from formal early learning experiences, with children aged up to two years only needing to be cared for.* This view is indicative of an outdated and artificial separation of education and care for young children.
- 6) *That it is acceptable to destabilise and diminish the early childhood (predominantly female and low paid) workforce so as to support women's workforce participation more broadly.* The primary purpose of an early childhood education and care sector should be the support and development of children's wellbeing, learning and development, not workforce participation. Entrenched low pay and onerous working conditions for early childhood teachers and educators need to be addressed and not compromised by the Government's productivity agenda.
- 7) *That longstanding workforce issues can and should be resolved by watering down staffing requirements.* Quality early learning and care experiences depend on a stable, qualified workforce that is well remunerated and has access to ongoing professional development. Weak staffing regulations are not only detrimental to children's early learning experiences but also exacerbate job stress, dissatisfaction and turnover.
- 8) *That a child's access to a quality early learning program should depend on their family's meeting of a work/study activity test.* We support universal and equitable access to quality ECE programs, irrespective of the work or study status of a child's parents. Any activity test requirement that limits access to an early learning subsidy excludes and labels children whose parents do not work or study.
- 9) *That early childhood education and care policy should centre on workforce participation.* The recommendations disregard the critical role quality early childhood education services play in building community capacity and cohesion and facilitating social inclusion. The Draft Report's narrow focus on economic objectives largely ignore these important social goals. Such a focus appears contrary to what ought to drive the Productivity Commission's work, which as is stated on p. ii of the Report, is a "concern for the wellbeing of the community as a whole".

In our response that follows we focus on *quality early childhood education and the critical importance of early childhood teachers*. We believe that it is imperative that the Australian Government develop and implement a policy trajectory that will meet COAG's goal of giving all children the best possible start in life (Council of Australian Governments, 2009). With over one million children attending formal early childhood education (ECE) settings (Productivity



Commission, 2013) it is critical that these services be of high quality. As is well documented in the Productivity Commission's Issues Paper, a strong evidence base from neuroscience, social science and econometric research unequivocally demonstrates that when formal ECE is of *high* quality, developmental outcomes for children are enhanced and families' wellbeing is promoted. High quality ECE also ameliorates social disadvantage, facilitates women's workforce participation, and fosters social inclusion (Economist Intelligence Unit, 2012). Additionally, as a signatory to the United Nations Convention of the Rights of the Child it is incumbent on the Australian Government to develop ECE policy that is grounded in the rights and best interests of young children. In sum, the Australian Government's investing in ECE as a means to achieving economic, education and social policy goals, as well as meeting its international legal obligations, is contingent on a sector that is supported by government to deliver high quality early learning experiences for young children.

To this end we outline below the importance of ECE policy that acknowledges and supports qualified staff – particularly early childhood teachers – and robust ratios as critical contributors to quality ECE for young children, including children aged birth – three years. We also provide the Commission with recent data pertaining to demand for nannies.

### ***Part One Teacher requirements and ratios***

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The IEC rejects recommendations 7.2, 7.3, and 7.5 which, if implemented, will weaken staff:child ratios and reduce the number of employed early childhood teachers within individual centres and across the sector. Based on the research base presented below we believe that in turn, the quality of early childhood settings will diminish.

### ***Ratios***

According to the OECD (2012, p. 35) staff-child ratios "is generally the most consistent predictor of high-quality learning environments". An extensive and well established body of international research clearly shows that robust ratios enable safe environments for young children, support regular, warm and stimulating interactions between staff and children, enhance cognitive, language and socio-emotional outcomes, and mitigate workplace stress and staff turnover (e.g., Blau, 2000; Fenech, Harrison, Press, & Sumsion, 2010; Gerber, Whitebook, & Weinstein, 2007; Ghazvini & Mullis, 2002; Goelman et al., 2006; Munton et al., 2000; Phillips, Mekos, Scarr, McCartney, & Abbott-Shim, 2000). Robust ratios directly contribute to centre quality, but indirectly as well, through their impact on how children and staff experience the early childhood setting.

Prescribed NQF ratios fall short of international benchmarks (American Academy of Pediatrics, 2005) for most age groups (see Table 1). The ratios recommended by the American Academy of Pediatrics have been determined as what is required to support young children's brain development and wellbeing. Ratio standards in some states that exceed NQF requirements also



fall short of these recommended ratios. Proposed recommendations to determine ratios by average staffing levels and to achieve national consistency by removing grandfathered ratios will significantly compromise centre quality, children’s developmental outcomes, and parental confidence in formal child care options.

Age of Child	NQF Standards	American Academy of Pediatrics’ recommended ratios	Grandfathered Standards
Birth - 12 mths	1:4 Jan 1, 2012	1:3	N/A
13–24 mths	1:4 Jan 1, 2012	1:4	N/A
25 – 30 mths	1:5	1:4	VIC = 1:4
31 –35 mths	1:5 Jan 1, 2016	1:5	VIC = 1:4
3 years	1:11 Jan 1, 2016	1:7	NSW, SA, TAS, WA = 1:10
≥ 4 years	1:11 Jan 1, 2016	1:8	NSW, SA, TAS, WA = 1:10

Table 1: Comparison of NQF, American Academy of Pediatrics’ recommended, and current grandfathered staff:child ratios

### *Early childhood teacher requirements*

A strong evidence base attests to the critical contribution early childhood teachers make to the provision of quality early learning and care environments for young children. In her review of research on quality early childhood services for children aged 3 – 5 years and staffing qualifications, Whitebook (2003) concluded that early childhood teachers undertake practices that lesser and unqualified staff were less inclined to do, namely interact more with children; provide more warm, responsive, sensitive and stimulating interactions, and therefore less authoritarian, punitive, and detached interactions; and undertake more in-depth observation and monitoring of children’s development. Collectively, these practices were found to lead to higher levels of classroom quality, and better and more sustained socio-emotional, language, cognitive developmental outcomes for children. Children with access to an early childhood teacher demonstrated more persistence with tasks and more co-operative behaviours, engaged in high-level peer play, and were less likely to wander aimlessly.



The renowned Effective Provision of Pre-school Education (EPPE) study (Sylva, Melhuish, Sammons, Siraj-Blatchford, & Taggart, 2004) and subsequent investigation into effective leadership in early childhood settings (Siraj-Blatchford & Manni, 2007) found that teachers had the most impact on centre quality and children's pre-reading and social skills. Qualified teachers in these centres used more academic activities in their programming, engaged children in higher level thinking, and were more likely to encourage 'sustained shared thinking', a collaborative, intellectual approach used to develop knowledge and extend thinking. Moreover, prior-to-school centres that most effectively supported children's developmental outcomes had early childhood teachers in management positions. In this capacity, early childhood teachers exercised strong leadership, and had a key role in centres' curriculum development and planning.

Subsequent studies (e.g., Seung-Hee, Kyong-Ah, Hyun-Joo, & Soo-Young, 2013) and reviews (Kelley & Camilli, 2007) support the established correlation between early childhood teacher qualifications, classroom or centre quality, and child outcomes. Preliminary findings to emerge from the longitudinal Australian E4Kids study which is examining the influence of service quality on children's developmental, health & wellbeing, and social inclusion outcomes, are already showing a link between teaching qualifications and process quality, that is, the quality of a child's experience of the early childhood setting (please refer to submission from Professor Collette Tayler and colleagues).

Despite this extensive body of research the Commission's recommendations rest on only two studies, Early et al., (2007) and Warren and Haisken-DeNew (2013). We consider this to be particularly problematic given the disclaimers the authors of both studies make about their findings. In the latter study the highest Year 3 NAPLAN scores were achieved by children whose preschool educator had Diploma qualifications. In personal communication with the first author Warren acknowledged that it was not possible to distinguish between TAFE and University diploma qualifications, and she presumed that the "diploma qualification" category included higher level three-year diploma qualified teachers (personal communication, August 7). Early and colleagues' review of seven US studies that examined program quality and/or program effectiveness found limited direct correlation between staff qualifications and classroom quality or academic outcomes for children. To this finding, however, the authors cautioned, "although the quick and incorrect conclusion might be that anybody can effectively teach preschool, we believe that the results from this study *must be interpreted cautiously* (my emphasis) and that they raise more questions than answers" (p. 573).

The authors' discussion rightly notes that teacher effectiveness is dependent on factors that extend beyond the qualification attained, and include the level of support and mentoring provided once employed, as well as remuneration and working conditions. This view is supported by recent Australian research (Fenech et al., 2010) that investigated the sustained provision of high quality early education and care in six case study centres in NSW. Findings supported the employment of early childhood teachers as pivotal to pedagogical leadership and the support and mentoring of centre staff. Additionally, findings highlighted that multiple, interconnecting factors contribute to a quality early childhood setting, including low staff:child ratios that exceed regulatory requirements, ongoing opportunities for professional development (as opposed to technical



training), and wages and conditions that support staff satisfaction and retention. Rather than dismiss the value-added benefit of early childhood teachers, such findings highlight the need for policies that support ongoing teacher effectiveness once employed.

### *The need for more extensive data collection and mining of NQS and ECE Census data*

We believe that consideration of the two tables below further show the recommendations pertaining to teachers and ratios to be uncalled for. It is our view that further analysis and integration of NQS and Census data is needed to inform future policy directions.

<b>ACECQA ratings of NSW ECEC services as at 30/9/2013</b>	<b>Analysis of ACECQA ratings of NSW ECEC services by Community Child Care Co-operative (2014), as at 14/11/2013</b>	<b>Ratings of KU services as at March, 2014.</b>
14% of services rated as Exceeding the NQS	84% of services rated as Exceeding were not-for-profit community based services	63% of rated services - Exceeding
29% of services rated as Meeting the NQS		31% of rated services - Meeting the NQS
56% of services rated as Working Towards the NQS	80% of services rated as Working Towards the NQS were for-profit services	7% of rated services - Working Towards the NQS

TABLE 2. NQS ratings data analysis: ACECQA, Community Child Care Co-operative, and KU Children's Services

Table 2 shows that as at September 2013, just over half (56%) of NSW services that had been assessed were working to meet the NQS. Analysis by Community Child Co-operative (2014) of NSW assessed services, however, shows that an overwhelming majority (80%) of the services rated as Working Towards were for-profit services. In contrast, of centres under the auspice of KU Children's Services, a major not for profit preschool provider, only 7% rated as Working Towards while nearly two-thirds (63%) rated as Exceeding. Table 3 is an analysis of recently published NQS data from ACECQA's August Snapshot and KU's website.



	KU	NATIONAL	NSW	VIC
<b>Working towards</b>	7%	37%	47%	22%
<b>Meeting</b>	26%	36%	34%	48%
<b>Exceeding</b>	67%	26%	19%	30%
<b>Meeting + Exceeding</b>	93%	62%	53%	78%

TABLE 3: KU NQS ratings by national, NSW and Victoria ratings

Collectively, data from Tables 2 and 3 suggest that overall, not-for-profit services are operating at higher levels of quality than for-profit services. With regard to teacher qualifications and ratios, however, additional data is needed to tease out this possible reading. First:

- Do not-for-profit services employ more early childhood teachers than for-profit ones?
- Do not-for-profit services use lower staff:ratios than for-profit services?

Findings from a recent case study investigation of contributors to high quality education and care in long day care settings found that on average, the six participating centres allocated 84.4% of their budgets to staffing (as reported in Waniganayake, Cheeseman, Fenech, Hadley, & Shepherd, 2012). These centres met or exceeded teacher and ratio requirements as stipulated by current NSW grandfathered standards. The extent to which these findings can be generalised is unknown and warrants further investigation via a mining (and if necessary, collecting) of NQS and early childhood census data.

Second, KU's overrepresentation of centres meeting and exceeding the national quality standard extends the possible nexus between profit status and quality to governance. KU attributes their high ratings to multiple factors that stem from a governing body that is committed to high quality and reinvests surpluses accordingly (personal communication with KU's CEO). This reinvestment pertains not only to the employment of teachers but to significant professional development and support. Notably, KU has a lower than average staff turnover rate. A possible correlation between governance and NQS ratings, irrespective of profit status, also warrants further data collection and analysis.

Third, Snapshot data published by ACECQA represents data from *all* service types. This conflation of data means that it is not possible to determine how long day care centres or preschools are respectively rating, and potentially, the value added benefit of employing teachers is lost. NQS data at the service type level, and that is publically available, is urgently needed.



### *Conclusion and recommendations*

To make such significant staffing regulatory changes as recommended in the Commission's Draft Report would be premature and unwise. There is more than sufficient evidence to show that the employment of early childhood teachers do make a difference to service quality and outcomes for children. Early childhood teachers, however, need to be supported to make that difference. There is significant scope for extensive data collection and analysis to be undertaken in the current NQF context that could inform future policy directions.

We urge the Commission to retract recommendations 7.2, 7.3 and 7.5 that:

- Are contrary to research evidence;
- Are contrary to the views of major early childhood education and care providers who support robust standards and do not consider them to be a burden;
- Are premature given the limited roll out of the NQF and the lack of data that would inform analysis of the quality ratings and guide future policy directions;
- Will water down regulatory standards such that quality care and early learning will be detrimentally affected; and
- Will exacerbate existing workforce issues: the employment and retention of qualified staff, early childhood teachers in particular

We ask the Commission to recommend:

- A retaining of current NQF requirements
- An addressing of workforce issues, as per the Productivity Commission's workforce report (Productivity Commission, 2011)
- That analysis of NQS data be undertaken – both nationally and by each state/territory jurisdiction – according to service type, and that findings from this analysis be made publically available
- That NQS ratings be linked to EC Census data on qualifications, ratios, group size, staff turnover, professional development and support, profit status and governance

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### **Part Two: Teacher requirements for children aged 0 – 3 years**

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It is well established that the first three years of a child's life is pivotal to their future development and wellbeing. In the context of formal early childhood settings a strong and growing evidence base clearly highlights the need for qualified staff – early childhood teachers in particular – to support the learning and development of children at this critical age. A contributing factor of such qualifications is the inclusion of specialised early childhood content, in particular, knowledge content and practicum experience with children under three. Conversely low qualified staff are little equipped to provide such early learning experiences. The high turnover of this cohort of staff (Productivity Commission, 2011) compromises the stable relationships babies and infants require.

For an in-depth, evidence-based discussion of these issues please refer to Appendix 1 (pp. 18 – 32) for Dr Sheila Degotardi and Ms Sandra Cheeseman' submission. This submission is based on Dr Degotardi and Ms Cheeseman's presentation to the August 14 Productivity Commission hearing.

### **Part Three: Teacher requirements to support children's physical development**

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Draft Finding 5.1 begins with the assumption: *“Generally, Australian children are doing well developmentally and most are well prepared to begin formal schooling. Those who are less well prepared tend to be Indigenous children, children living in socio-economically disadvantaged communities, children living in very remote areas and children from non-English speaking backgrounds. There is likely to be overlap across these groups.”* (p.48). The assumption is embedded within a section relating to “Additional needs children and services” but clearly the assumption that, outside of exceptional populations that can receive specific services, there are no major concerns about Australian children's development.

Nationwide surveys of Australian children's development, which provide the most representative developmental data, show early developmental vulnerability to be far more pervasive than assumed by the Productivity Commission. 2012 data from the Australian Early Development Index (AEDI) indicates 22% of children to be developmentally vulnerable in at least one of the five developmental areas measured and 10.8% of children are vulnerable in two or more areas. The 2012 AEDI data are discussed in the Productivity Commission Draft Report, but the authors choose to focus on the majority of children who are doing well, not the large minority of children who are at-risk. While some developmental vulnerabilities are associated with particular community risk factors and the Productivity Commission is correct in noting



specialist interventions may be required, there are many children outside those communities who are also at-risk.

Two such areas are low levels of physical activity and anxiety, both of which are known to be significant health problems in Australia. The 2014 Report Card on Physical Activity for Children and Youth awarded Australia a D- rating (less than average), with daily physical activity requirements not being met by 28% of 2- to 4-year-olds and 80% of children over 5-years (Schranz, et al., 2014). A large survey on a geographically smaller scale (Melbourne metropolitan area) found of 6,307 3-6 year olds, 11% met the screening cutpoint for temperamental inhibition, a temperamental characteristic which is widely recognised as a precursor to anxiety and an indicator that early intervention is required (Beatson et al., 2014).

Before the preschool years, it is possible for centre staff to introduce play-based, non-clinical preventive programs given appropriate staff training and environment. By the preschool years, centre staff play an important role in early detection, referral and intervention. In order to have a significant role in detection, prevention and intervention, early childhood staff require a university early childhood teaching qualification that provides them with skills in: evaluating children's development, observation and reporting skills, planning and programming, working with families and communities, working with multidisciplinary teams, research literacy and an understanding of the need for ongoing professional development.

In the next decade, there is likely to be a difference in the way the international health community views centre based early childhood care and education. Until recently, the role of early childhood staff and early childhood contexts received low levels of recognition, but there is now greater recognition of contributions to national and world health by the non-health sector as evidenced by a recent workshop of the Board on Population Health and Public Health Practice (USA) (Wizeman, 2014). The Australian Government has committed \$20 billion to its Medical Research Future Fund (2014). Investing in medical research alone is not sufficient to change health outcomes, skilled practitioners within broader community contexts are required to translate research into practice. As the National Health and Medical Research Council (2014) notes, "The creation of knowledge does not, of itself, lead to widespread implementation and positive impacts on health. The knowledge must be translated into changes in practice and policy for the benefits to flow to Australians."

For physical activity, research reviews have noted staff training to be positively associated with physical activity (Trost, Ward & Senso, 2010; Wyver, Tranter, Sandseter, Naughton, Little, Bundy, Ragen, & Engelen, 2012). The most cited study examining a range of demographic, policy and quality factors in childcare included the following finding regarding moderate-vigorous physical activity (MVPA), "Children attending preschools in which the majority of teachers were college educated demonstrated a higher percentage of playground time in MVPA than those attending preschools with fewer college-educated teachers." (Dowda, Pate, Trost, Almeida, & Sirard, 2004, p. 189). One Australian study has found staff training to also be associated with physical activity, but the training was specific to physical activity. However, this study did not sample enough centres to examine training more broadly (Sugiyami, Okely, Masters & Moore, 2012).



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### **Part Four: Workforce issues (Professional development)**

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International benchmarking studies on early childhood policy have consistently shown that high performing countries such as Finland, Norway and Denmark have a well established “high bar” for those employed in ECEC settings, “with specific qualifications” and “commensurate wages, as well as low student-teacher ratios” (EIU, 2012, p.6). There is also increasing evidence to show that retention of well-qualified early childhood teachers is difficult without adequate remuneration, public recognition of professional status and the absence of pathways to career advancement within the sector (Waniganayake et al, 2012). In contrast, professional autonomy and teacher leadership as practiced in Finland for instance (Sahlberg, 2011), can not only foster engagement in quality improvement, it “can help address staff attrition and shortages” (EIU, 2012, p.27).

The Productivity Commission highlighted the importance of augmenting formal qualifications with participation in continuous professional learning and development of the early years workforce.



As outlined in the Productivity Commission's previous research report on the *Early childhood development workforce* (2011) we wish to reinforce the proposed the establishment of "a minimum standard of 5 days per year of planned PD&S for each children's services practitioner employed in a prior to school setting" (Waniganayake, Harrison, Cheeseman, De Gigoia, Burgess & Press, 2008, p. 2). This recommendation, if enacted, can contribute to achieving parity for ECTs with school teachers by legitimising access to funded professional learning, as both a right and a responsibility.

Likewise, we also believe that given the fast paced social and policy changes and increasingly complex family demands encountered by contemporary EC practitioners, access to appropriate professional development opportunities for senior staff holding management and leadership roles is essential. Research in early childhood contexts within Australia (Colmer, 2013; Waniganayake et al, 2012) and overseas (eg. Aubrey, 2011; Siraj-Blatchford & Manni, 2007) provide sound evidence on the connections between leadership and service quality. We note that Macquarie University offers a dedicated Master of Educational Leadership with a specialisation in early childhood, delivered flexibly by incorporating both on-campus and online teaching and learning strategies.

There is an urgent need to build leadership capacity within the early childhood sector, in particular to ensure that there are sufficiently well qualified educational leaders who can be appointed to support early childhood services operating within rural and remote communities. The IEC's masters degree in Educational Leadership is the only dedicated postgraduate degree available that offers specialist preparation for early childhood leaders. In countries such as Finland, who continue to achieve high outcomes for education, it is taken for granted that all teachers have a masters degree before being employed as a teacher. Government support for initial qualifications is beginning to make a difference in the increasing professionalization of the early childhood sector and this can be now advanced from a long-term strategic perspective.

The availability of scholarships for those with at least two years of early childhood work experience can go a long way towards building leadership capabilities within the sector in general, and in remote and rural communities in particular. Educational leaders responsible for advancing curriculum and pedagogical decision-making within prior to school settings must be recognised as master teachers and their positions identified as a senior appointment in career trajectories in the sector. Given the "absence of a linear predictable career pathway that can systematically foster early childhood leadership" (Waniganayake et al, 2012, p.232), this type of policy intervention can encourage the new generation of early childhood teachers to commit to staying employed in the sector by aspiring to positions of leadership. To be effective, however, it is essential that these educational leaders are well supported through public acknowledgement of their higher status and their employment being adequately remunerated by employers.

### Recommendation:

[That the government offers scholarships to those interested in pursuing postgraduate studies with the aim of becoming educational leaders in early childhood.](#)



### Recommendation:

That the government supports those identified as an 'Educational Leader' in an early childhood setting through opportunities for ongoing professional development and working conditions that reflect additional responsibilities in the sector.

It is also clear that the wealth of a nation or its global economic ranking is not a sufficient indicator of its investment in early childhood education nor commitment to the wellbeing of the youngest citizens, children birth to eight years. In the case of Australia, this is even more shameful because as yet, the right to early childhood education is not enshrined in national law as an entitlement for every child. Moreover, "despite having a lower per capita GDP, Greece outperforms both Australia and Singapore, thanks in part to significant efforts over the past decade to bolder educational requirements for preschool teachers" (EIU, 2012, p.12). This is not surprising given the failure of national policy reforms in this country to ensure early childhood teacher quality is explicitly defined against university based degree qualifications as well as stipulating mandated standards for continuing professional development for the early childhood workforce. Consider this against Finland, the top ranking country for early childhood education, where education is "a basic human right to all in the Constitution" and "teaching is a prestigious profession" (Sahlberg, 2011, pp.10-11).

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### **Part Five: Nannies**

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The Productivity Commission has recommended that families whose nannies comply with the NQS be eligible for fee relief. This recommendation is in part based on the view that nannies are the “preferred form of child care for many families” (p. 370). Contrary to this view, research currently being undertaken at Macquarie University suggests that demand for nannies is particularly low.

*What’s Best for My Child?* is a national study that aims to investigate how parents’ understanding of early child development and quality early childhood education and care influence their child care choices. In a national survey currently being administered respondents are asked about what they consider the best type of child care is for children aged birth – 2 years and 3 – 5 years. Respondents are either current or prospective users of formal child care. The same question was also asked to a nationally representative sample of over 700 Australians.

Findings below report the percentage of respondents who considered a nanny to be the best option.

	0 – 2 s	3 – 5s
General public (n = 755; 767)	2.8%	0.9%
Current users (n = 481)	4% (19)	0%
Prospective users (n = 185)	8% (15)	0%

Only 34/666 (5%) of survey respondents considered nannies to be the most preferable child care option for children aged birth - two years. No respondent (0%) stated that a nanny was their preferred child care option for children 3 - 5 years.

These preliminary findings suggest that families may not use a nanny not because they cannot afford one, but because they do not consider a nanny to be the best child care option. If families are to instead access formal child care then it is critical that they feel confident about the quality of care and early learning their child is receiving. To this end we reiterate our view that current regulatory standards be maintained.

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## **APPENDIX 1**

**The impact of reducing educator qualification requirements on the program quality and ultimate learning and development of children aged birth to 3. Evidence from International and Australian research.**

**Submission to the Productivity Commission in response to the Draft Report into Childcare and Early Childhood Learning, 2014**

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## Overview:

This paper addresses key Draft recommendations contained within the Productivity Commission Report into Childcare and Early Learning. The commission proposes that qualification requirements for those working with under 3 year old children could be lowered without compromising quality (p.35). On this basis, the Commission proposed **Draft recommendation 7.2:**

- All educators working with children aged birth to 36 months are only required to hold at least a certificate III or equivalent, and
- the number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.

Furthermore, **draft recommendation 7.5** proposes that ACECQA should:

- remove the requirements that persons with early childhood teacher qualification must have practical experience for children aged birth to 24 months.

The Productivity Commission argues that this move will reduce the cost of provisions for very young children, allowing the early childhood and care (ECEC) marketplace to determine whether parents are willing to pay the increased costs associated with higher qualified staff. The presence of qualified staff is regarded as a 'value-added extra', rather than as a significant contributor to the quality of the ECE program or the learning outcomes of under three-year-old children.

The Commission intends to investigate further the implications of the proposed changes, and is seeking advice on the expected impacts on the development of children under 36 months. This paper aims to contribute towards this investigation by drawing on recent empirical evidence about the impact of educator qualifications on infant-toddler program quality as well as infant-toddler workforce capacity and satisfaction. We feel that, by considering recent and robust evidence findings, the Productivity Commission will be better positioned to make recommendations which meet its aim, as stated in the draft report, to *"help governments make better policies, in the long term interest of the Australian community"* (p.ii). In this submission, our focal point is the **long term interest of our youngest citizens** - our infants and toddlers - and the evidence-based impact that the above-cited recommendations will have on their learning and development.

Our key concern is to advise in regards to point 1b of the Scope of Inquiry - that is to investigate the contribution of affordable, high quality child care to optimising children's learning and development. In the following pages, we make three key points:

### **Key point 1: High quality infant-toddler programs matter**

We draw on recent longitudinal investigations of the impact of high vs low quality infant-toddler early childhood education and care programs to demonstrate that the quality of the program is pivotal in ensuring the best learning and development outcomes for our children

### **Key point 2: Education qualifications *are* empirically related to important elements of program quality that predict child outcomes**



We present evidence to demonstrate the empirical links between educator qualifications and infant-toddler program quality, and to refute the misconception that care and education can be separated in infant-toddler early childhood programs

### **Key point 3: Educator qualifications also *indirectly* impact on quality**

We present emerging evidence from international and Australian studies which demonstrate that qualification levels are necessary for educator workplace satisfaction, retention and leadership

### **Key Point 4: Certificate III is insufficient as a qualification for working with infants and toddler**

We present information to demonstrate that entry level Certificate III vocational program does adequately prepare educators to work autonomously with infants and toddlers.

### **Key point 1: High quality infant-toddler programs matter for children's development and learning**

As acknowledged by the Productivity Commission report, there exists a body of evidence which demonstrates that the quality of early childhood experienced during the first years of life has significant ramifications for children subsequent developmental and learning outcomes. The first three years of life have been identified by psychological, medical and educational researchers as being foundational in terms of cognitive, social, emotional, language and physical development, with robust evidence demonstrating that early experiences matter. In particular, ***sensitive, responsive, emotionally available and cognitively stimulating interactions*** are identified as core contributors to the early learning of these foundational skills.

The Productivity Commission report cites Melhuish (2004) to suggest that research is inconsistent in their findings of the effects of infant-toddler ECEC on later development. What is missing from this citation is Melhuish's (2004) accompanying qualification that participation alone is insufficient to demonstrate effects, but that **effects of infant-toddler ECEC are attributed "at least partly to differences in the quality of the childcare received by children"** (p. 47). Similarly, the Commission's use of the Centre for Community Child Health (2014) report to highlight potential negative effects should be moderated with reference to the major recommendations of this report that i) the Government has a major obligation to determine and implement universal quality standards for ECEC (p.2) and ii) lower staff ratios and higher qualifications are integral to any approach towards improving quality (p.3).

While some studies published in the 1990s and early 2000s reported negative or relatively negligible (Lefebvre & Merrigan, 2002) effects of attendance in infant-toddler ECEC on children's later development, these studies are limited by the general omission of measure of quality. A later wave of research has which has included such measures have highlighted the significance high quality programs for under twos by detecting **significant associations between infant-toddler program quality and children's development**. The well-known NICHD Early Child Care Research Network study of the effects of early child care in the US have reported that positive caregiver infant interactions, as rated through observations of sensitive, intrusiveness, emotional warmth and stimulation in the first year of life, predict cognitive development and pre-academic



scores as well as language development (National Institute of Child Health and Human Development and Early Child Care Research Network, 2000). Follow-up studies reported similar findings for the accumulated quality across infancy and toddlerhood, leading the authors to state that high quality child care can have considerable benefits for children's cognitive and linguistic functioning. Implications have also been reported for very young children's social and emotional development (National Institute of Child Health and Human Development Early Child Care Research Network, 2002). Phillips et al., (2013), for example, reported that infants in high quality centres were more likely to have positive interactions with their peers than those who attended lower quality services. In Australia, The Longitudinal Study of Australian Children has reported significant positive effects of the quality of caregiver active engagement with infants and their subsequent social competence (Harrison, 2008). Research from the Israeli Haifa study of early care have reported that infants and toddlers attending low quality services are at risk of developing insecure attachment relationships with their mothers (Sagi, Koren-Karie, Gini, Ziv, & Joels, 2002).

The question of whether such developmental implications endure over time have been addressed by two recent studies, again drawing from the NICHD data. Vandell and colleagues (Vandell, Belsky, Burchinal, Steinberg, & Vandergrift, 2010) reported that children who experienced high quality early childhood education and care averaged over the first 5 years of life were reported by their teachers to have significantly higher cognitive achievements and significantly lower levels of externalising behaviours at age 15. Of most significance to this submission is a recent analysis of the timing of quality indices for subsequent development. Li, Farkas, Duncan, Burchinal and Vandell (2013) investigated children's outcomes as determined by their specific combination of high and low quality infant and preschool programs. While they found significant gains associated with the quality of preschool programs, they also found that high quality infant-toddler care was associated with developmental gains that endured **regardless** of the quality of the subsequent preschool program. Children's cognitive, language and pre-academic skills prior to school entry were the highest for those who had experienced high quality in both settings, but attendance in high quality infant-toddler programs was associated with significant gains over and above those explained by the quality of the pre-school program.

It is therefore clear that the key point, identified by the productivity Commission report, that ECEC services play a vital role in the development of Australian children and their preparation for school *does not only* apply to services for pre-school aged children. While research is inconsistent in relation to whether attendance in infant toddler programs is beneficial or detrimental, recent evidence strongly concludes that the **quality of infant-toddler classrooms has significant and far-reaching effects**. In particular, the quality of services for infants and toddlers has a significant impact on pre-academic and important social - emotional skills, demonstrating overwhelmingly that the contribution of ECEC on development and school readiness begins in infancy.

It is of concern, therefore, that some international and Australian studies have raised concern that the **quality of infant-toddler programs tends to be poorer than those of pre-school aged children** (Fenech, Sweller & Harrison, 2010; Goelman et al., 2006; Thomason & La Paro, 2009), and that low income families tend to access the lowest quality ECEC services (Melhuish, 2004). These concerns are supported in a recent study by La Paro, Williamson and Hatfield (2014) who



report that the quality of 93 toddler rooms were rated as low in terms of interactions which support learning and language development. The researchers note with concern the relatively low level of qualifications required in these US centres, as well as the lack of infant-toddler content in most early childhood qualification programs. They conclude that "it is becoming clear that intentional efforts need to be made in regard to policies that require educational levels and experiences for teachers of toddler age children and in preservice education" (p.889)

***In summary, these findings demonstrate that:***

- The quality of infant-toddler programs have short and long term effects across a range of cognitive, language and social-emotional areas.
- These effect appear to endure over time.
- Infant toddler programs vary considerably in quality from poor to high, but research suggests that quality may be poor, relative to programs for older children
- Raising educator qualifications requirements and addressing the shortage of infant-toddler content in qualifications is suggested as a way of addressing quality disparities.

**Key point 2: Education qualifications *are* empirically related to important elements of program quality**

The Productivity Commission Report concludes that there is little evidence to support the idea that qualified educators are needed in programs for children under 3. In drawing this conclusion, the Commission appears to have overlooked recent studies which have examined factors influencing the quality of early childhood education and which overwhelmingly cite educational qualification as a significant contributor to program quality. Higher levels of education are associated with increased knowledge in children's development and stronger understandings of how development and learning can be facilitated in age-appropriate ways (Berthelsen & Brownlee, 2005; Burchinal, Cryer, Clifford, & Howes, 2002; Phillips & Adams, 2001). This is not only the case with educators of pre-school aged children, but also, with those of under threes. Commissioned reports and theoretical discussions of the quality of education and care programs for infants and toddlers cite **teacher education as a significant contributor to quality** (Dalli, White, Rockel, & Duhn, 2011; Press & Mitchell, 2014), a conclusion supported by a growing body of evidence from large, comprehensive international studies into the effects of early experience in early childhood education and care programs. For example, a number of studies exist to demonstrate that reported that higher levels of educator qualifications were associated with higher global measures of quality, as assessed by the widely used quality measure - the Infant Toddler Environmental Rating Scale (Burchinal et al., 2002; Hestenes, Cassidy, Hegde, & Lower, 2007; Phillips, Mekos, Scarr, McCartney, & Abbott-Shim, 2001; Phillipsen, Burchinal, Howes, & Cryer, 1997). **Specialised early childhood training** has also been found to predict positive caregiving interactions (Manlove, Vazquez, & Vernon-Feagans, 2008; National Institute of Child Health and Human Development Early Child Care Research Network, 2002). Qualification levels also explain significant variations in important caregiver cognitions, such as adherence to non-authoritarian caregiving beliefs (National Institute of Child Health and Human Development Early Child Care Research Network, 1996) and the presence of complex levels of reasoning about infant development and behaviours (Degotardi, 2010; Manlove et al., 2008).



It is important to remember that measures of caregiver education and the nature of educator qualification requirements and programs vary considerably between and within countries. In some studies, the qualification measurement has captured a general level of post high-school education. This is the case with the Longitudinal Study of Australian Children longitudinal analysis cited in the draft report which concluded that there was no effect of educator qualification levels on subsequent child outcomes (Giarlamias, Mittinty, Sawyer, Zubrick and Lynch, 2014). In this instance, a lack of significant effects can be attributed to the generic nature of the education level, which may or may not have any early childhood content. Furthermore, some early childhood qualifications in the past and current-day practice focus very little on the learning and teaching of children under 3. The two other key longitudinal studies which reported no, or inconsistent relationships between teacher education and measures of quality both cite difficulties with the measurement of educator qualification levels as a reason for the lack of significant relationships in their study. For example, when noting inconsistent findings relating to educator qualifications across their 6, 15 and 25 month measures of caregiver interactions, the NICHD (2002) explain that this inconsistency would, in part, be due to the fact that the wide variation of qualification content and requirements reduces the reliability of their qualification measurement. Another large Dutch study which, again, failed to report the significance of qualification levels on overall infant-toddler room quality proposed that this finding was likely due to a lack of focus in many early childhood qualification programs on infant-toddler development (Vermeer et al., 2008). As explained by Huntsman (2008), it seems clear that the **level of specialisation in the qualification is the feature that contributes towards the quality of the program**

More conclusive findings about the contribution of qualifications to infant-toddler program quality therefore come from countries with similar qualifications structures as Australia. One such study was conducted in Canada by Goelman and colleagues (2006), who investigated contributors to quality in over 100 infant-toddler programs. The early childhood qualification level of educators was one of two most significant predictors of quality, as measured by the ITERS (the other significant predictor being that of educator-infant ratios). The researchers conclude that **pre-service early childhood education programs "provide these individuals with the knowledge and skills to deliver quality early childhood care and learning environments."** This is further supported by Mathers, Eisenstadt, Sylva, Soukakou, & Ereky-Stevens (2014) who found in a recent review of research that although the evidence-base is less rich than that for over threes, there was good evidence that qualifications matter for under threes. "In short, good quality staffing underpins good quality practice" (p. 140). They also found that it was difficult to make any determination about the impact of highly qualified educators working with young children because it was difficult to gather sufficient data given that there are currently insufficient highly qualified educators working with infants and toddlers to enable a robust and valid study.

Further to this, The Evaluation of the Graduate Leader Fund (Mathers, Ranns, Karemaker, Moody, Sylva, Graham and Siraj-Blatchford, 2011) also identified the dangers of drawing conclusions about the impact of highly qualified staff on learning and development outcomes for infants and toddlers based on an inconclusive evidence base:

***The authors of the Evaluation of the Graduate Leader Fund argued that, in fact, we do not know enough to draw firm conclusions either way ... .. This is a challenge for future***



***research, and there is a pressing need to understand more about the relationship between qualifications and quality for children under three, and how these different dimensions of professional preparation and support relate to each other.***

If it is not possible to make recommendations for highly qualified educators to work with infants and toddlers based on inconclusive evidence then **it is equally not possible to make recommendations for educators to have a low level of qualifications.**

While such large scale investigations are yet to be conducted in Australia, Degotardi (2010) found significant associations between 24 infant educators' qualifications levels and behaviours and cognitions that predict children's wellbeing and development. Using the NICHD's Observational Record of the Caregiving Environment, she found that educators with diploma or degree level qualification were rated as more sensitive and stimulating in play and routine caregiving contexts than those with Certificate level or no formal early childhood education qualifications. The level of complexity of these educators' reasoning and understanding of infant behaviour also increased significantly in accordance with their qualification level.

Finally in this section, the Productivity Commission argues that ECEC for under 3s should focus on care rather than education (p.277), and uses this argument to justify their conclusion that only minimally qualified educators are needed in this context. This conclusion is contrary to an increasing body of literature which find that care and education for our youngest children cannot be separated, and that one very much depends on the presence of the other (Brooker, 2010; Dahlberg, Moss, & Pence, 1999; Rockel, 2009; Taggart, 2011). Contemporary, evidence-based approaches to ECE therefore argue strongly that **caregiving is an integral aspect of an educational program** for young children, and the role of the educator is to identify and capitalise on the learning opportunities that are evident in caregiving practices (Degotardi & Davis, 2008; Degotardi & Pearson, 2014; Sims & Hutchins, 2011). The Centre for Community Child Health's (Centre for Community Child Health, 2014) report, cited by the Productivity report to raise concerns about the potential impact on children's development of infant-toddler ECEC programs comprehensively justifies the integration of care and education functions as a means of improving effectiveness and quality. They justify their position with reference to multiple studies, summing this up as follows:

***Elliott (2006) argues that it is 'conceptually and ethically inappropriate to separate the care and education functions'. The younger the child, the more important it is to recognise the inseparability of care and learning: 'Every moment in which an adult provides care to a young infant is a moment rich with learning' (Lally, 2007)" (p. 8)***

The responsive, sensitive, emotionally available and stimulating interactions that have been identified in this report as empirically related to both qualification levels and developmental outcomes are **integral aspects of caregiving and teaching**. The proposal to reduce qualification requirements for this children based on an ill-conceived, artificial division between care and education runs counter to this evidence and runs the risk of seriously impacting on the quality of these services.

***In summary, findings from recent research demonstrate that:***



- Educator qualification are positively associated with general measures of program quality as well as more specific qualities of caregiver interactions with children
- When the qualification is a specialised early childhood education program (such as those offered in Australia), findings are more consistent and conclusive.
- The presence or absence of infant-toddler knowledge content in early childhood qualification program is a significant factor in determining whether the qualification level itself has implications for infant-toddler program quality.
- Any division of 'care' and 'education' for very young children is artificial and misinformed, and does not justify the removal of qualified educators from a program.
- Counter to the Productivity Commission claims, there is a significant body of evidence to suggest that reducing the required level of qualification for infant-toddler programs will compromise the quality of those programs.

### **Key point 3: Educator qualifications also indirectly impact on quality**

The Productivity Commission report rightly recognises that the **Early Childhood workforce is negatively impacted by low workplace satisfaction**, in particular, satisfaction with salary and perceived professional status (pp.472-473). This impacts negatively on retention and professional enhancement within the sector. As increased international attention is being drawn to the quality of infant-toddler programs, emerging quantitative and qualitative evidence strongly suggests that adults' experiences within their work environment also influences young children's learning experiences in these settings. Infant-toddler educators' satisfaction in the workplace can be an important influence in determining their responsiveness to very young children and their ability to deal positively and constructively with the emotional demands of working with this young age group (Elfer, 2014). Manlove et al. (2008) argue that the extent to which an early childhood setting is supportive of its employees can determine their caregiving practices in the room. They found a significant effect of infant educator workplace satisfaction on the levels of observed educator sensitivity. In another large study, de Schipper and colleagues (2008) found educators who reported a more positive and optimistic career outlook were demonstrated more positive and developmentally supportive interactions across a range of observational measures than those with a negative, pessimistic attitude. Of concern were findings in a previous analysis of the data which demonstrated that the general positivity of educators working with under two year olds was lower than those working with older children (de Schipper, Riksen-Walraven, & Geurts, 2007).

So how are educator qualifications implicated in these findings? For a start, reducing the required qualification level is likely to affect workplace satisfaction and the retention of staff due to the **low salaries** of Certificate level workers. Professional status is also at risk. In the Dutch studies mentioned earlier, researchers caution that in their country, where early childhood programs for under twos are interpreted as 'care' rather than 'education', low required qualifications levels are a contributing factor to a **lack of professional recognition and workplace status** (de Schipper et al., 2007; Vermeer et al., 2008). Qualitative research emerging from the UK, where programs for under threes only require minimally qualified staff, also point towards **low levels of job satisfaction** as well as **poor opportunities for professional and career development**; all of which contribute towards high staff turnover and low levels of positivity



(Clark & Baylis, 2012; J. C. de Schipper, Van IJzendoorn, & Tavecchio, 2004; Goouch & Powell, 2013). Similar concerns have been raised in New Zealand, where the requirements for qualified staff have been reduced in recent years (Rockel, 2005). This work, as well as that emerging from Australia (Berthelsen & Brownlee, 2005; Degotardi, Semann, & Shepherd, 2012 ; Ireland, 2007; Nyland, 2004; Press, 2006) unanimously concludes that the development, delivery and sustainability of high quality infant-toddler programs can be enhanced by addressing the professional knowledge-base of the infant-toddler workforce. As Siraj-Blatchford, Sylva, Muttock, Gilden, and Bell (2002) found, the presence of more highly qualified staff has positive influence on the behaviour of other staff, and Fenech, Harrison, Press , and Sumsion (2010) found that a core group of teachers is more likely to create a learning community and facilitate higher quality pedagogic practices which in turn enhance curriculum and outcomes for children.

#### **Key Point 4: The Certificate III credential is inappropriate as a qualification requirement for educators working with infants and toddlers.**

Scrutiny of the Certificate III credential exposes this competency based, entry level program as inadequate to contribute meaningfully to best learning and development outcomes for infants and toddlers who may spend significant time in childcare settings.

The Certificate III is described as a qualification that

***... reflects the role of workers in a range of early childhood education settings who work within the requirements of the Education and Care Services National Regulations and the National Quality Standard. They support the implementation of an approved learning framework, and support children's wellbeing, learning and development. Depending on the setting, educators may work under direct supervision or autonomously (Commonwealth of Australia, 2014, p.12).***

Clearly designed as an entry level program for those with limited work experience and in many cases for those with relatively low levels of high school achievement, this program emphasises foundational skills for those taking on a supporting role to work with more highly qualified educators.

The units of study within the Certificate III program are heavily weighted to content covering physical health, development, welfare and care of children with limited inclusion of units to support children's learning. There is only a single unit designated to specifically address working with infants and toddlers is titled 'Provide care for infants and toddlers' (p.12). Any assumption that this qualification might contribute positively to learning and development outcomes for infants and toddlers must be viewed tentatively and is not substantiated by the existing evidence base from both Australia and other comparable countries.

Draft Recommendation 7.2 'that all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent' will result in a revolving door of young, inexperienced and minimally educated people working with infants and toddlers. Once working toward a higher level of qualification these people will no longer be eligible to work with infants and toddlers and consequently the stable and knowledgeable workforce recommended for very young children will be severely eroded.



The Certificate III must be viewed as it was intended as an entry level career pathway and not as an end point or relevant specialist qualification in its own right. The Standing Council on School Education and Early Childhood describes the Certificate III as...

***Building a career pathway is a key step in raising the professionalism of the ECEC workforce. Clearly articulating the opportunities available for educators through updating and increasing qualifications will offer clear goals and reward professionalism, ultimately improving the quality of education and care of children (Standing Council on School Education and Early Childhood (SCSEEC), 2012, p.8).***

The National Quality Framework specifies the intent of early childhood education and care programs to contribute to enhanced learning outcomes for children from birth. The Early Years Learning Framework describes the work of educators who work with young children from birth as complex and requiring significant knowledge, sensitivity to children and families and capable of contextualising pedagogic decisions. "In order to engage children actively in learning, educators identify children's strengths and interests, choose appropriate teaching strategies and design the learning environment" (Australian Government Department of Education Employment and Workplace Relations, 2009, p.9). Educators are also asked to draw on a range of perspectives and theories to challenge traditional ways of seeing children, teaching and learning, and encourage educators, as individuals and with colleagues, to:

- investigate why they act in the ways that they do
- discuss and debate theories to identify strengths and limitations
- recognise how the theories and beliefs that they use to make sense of their work enable but also limit their actions and thoughts
- consider the consequences of their actions for children's experiences
- find new ways of working fairly and justly.(Australian Government Department of Education Employment and Workplace Relations, 2009, p.11).

These expectations for educators require high-order thinking and theoretical knowledge. Programs that will contribute to enhanced learning and development outcomes for children of all ages must be led by highly qualified experts in child development, pedagogy and curriculum. It is essential that teams of educators working with infants and toddlers come from a range of qualifications backgrounds including degree qualified early childhood teachers who can establish learning environments based on up to date and robust education theory and research.

***In summary, emerging international and Australian research is demonstrating that:***

- General work satisfaction for those working with under 2s tends to be lower than that of those working with older children
- There are real concerns about the professional knowledge base and long-term sustainability of this workforce
- Empirical relationships exist that link educators' levels of positivity, optimism and work satisfaction and the quality of their programs and interactions with very young children.

### **Conclusions and recommendations**



In sum, in contrast to the draft conclusions of the Productivity Commission, there exists a strong body of research to demonstrate that the provision of high quality infant-toddler ECEC is a necessary feature of infant-toddler programs that benefit learning and developmental. Conversely, attendance in low quality services places children's learning, development and wellbeing at risk. Evidence strongly suggests that a requirement for minimum only level qualification levels will have a detrimental effect on our youngest children, both directly, through the quality of the program that is offered, and indirectly, through the negative impact that a poor professional knowledge base and workplace satisfaction has on educators capacity to deliver a high quality program. When paired with concerns raised by the Productivity Commission report itself about the variable quality of early childhood qualifications, in particular the poor quality training associated with Certificate level qualifications (pp.494-495), it is clear that **moves to reduce the requirement for specialised early childhood educators with our youngest children are poorly conceived and risks the long-term wellbeing of Australian children.**

We conclude that requirements for qualification levels need to be rigorous, consistent and take into account evidence that qualifications levels have ramifications for both the children in infant-toddler programs as well as the staff. Qualification requirements also need to include the regulated inclusion of infant-toddler specialised content, so that those with the highest levels of qualifications can i) draw upon this when working directly with the children and ii) use this knowledge to support and guide the lesser qualified educators in their programs. In this way, negative outcomes for children can be avoided and the workforce sustainability and productivity of infant-toddler educators can be enhanced.

On this basis, we make the following recommendations to the Productivity Commission:

- 1. That the draft recommendation that educators working with children under three only be required to have a Certificate III is rejected.**
- 2. That the report, and its recommendations, be amended to clearly acknowledge the international and emerging Australian body of evidence in support of high qualifications with specialised content and experience in infant-toddler programs.**
- 3. That the final report clearly acknowledges the contribution that high quality infant-toddler education care makes to children's learning and development and recommends that the Government takes evidence-based measures to improve the quality of Australian infant-toddler programs. These measures will, at a minimum include:**
  - a. The mandated provision of diploma and teacher-qualified educators in infant-toddler programs**
  - b. The mandated inclusion of infant - toddler professional knowledge content and practicum experience in all university teacher-education programs.**
  - c. That all infant-toddler programs exist under the leadership of an university-qualified early childhood teacher with appropriate birth - 2 knowledge and experience.**
  - d. The provision of increased professional learning and development opportunities for infant-toddler educators**



4. **That the final report includes the recommendation that the Australian Government fund a comprehensive longitudinal study of the contributors to, and the learning outcomes associated with, the quality levels in infant-toddler early childhood education and care programs.**

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