

**Draft and Final Reports will be available from the Commission's website on release at:**

**<http://www.pc.gov.au/projects/inquiry/childcare>**

On August 26, 2014 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, the union with most coverage of the early childhood teacher workforce in NSW, and Australia's largest parent advocacy group, participated in 'Giving Children the Best Start in Life', a sector wide forum held at Macquarie University to consider a response to the Productivity Commission's Draft Report of Child Care and Early Childhood Learning.

**Participants unanimously rejected the following premises of the report:**

- 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learning experiences, with children aged up to two years only needing to be cared for.* This view is indicative of an outdated and artificial separation of education and care for young children.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".

### **Participants unanimously rejected the following recommendations:**

#### *General qualification and ratio requirements*

- Number of early childhood teachers to be determined by the number of children aged 4 – 5 years (7.2)
- All jurisdictions to adopt national qualification and ratio requirements (7.3)
- Meeting of ratios to be determined by average staffing levels, not at all times (7.5)
- Unqualified staff to be counted in ratios three months prior to commencing a qualification (7.5)

A significant body of research, including emerging findings from the Australian E4Kids study (See submission from Professor Collette Tayler and colleagues) testify to the value added benefit of robust ratios and staff qualifications, particularly the employment of early childhood teachers. These benefits extend to the process aspects of an early childhood setting (e.g. interactions and relationships with children; curriculum that supports and extends children's wholistic learning and development; communications with families and allied health professionals) as well as to the adult work aspects (staff turnover; job satisfaction; support and mentoring of less qualified staff). When these contributors are collectively in place, quality early learning and care experiences for children will follow.

Please refer to the submission from the Institute of Early Childhood for supporting evidence.

#### *Children aged birth – 3 years*

- All educators working with children aged birth to 36 months are only required to hold at least a certificate III or equivalent (7.2)
- ACECQA should remove the requirements that persons with early childhood teacher qualification must have practical experience for children aged birth to 24 months (7.5)

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.

Please refer to the submission from Dr Sheila Degotardi and Ms Sandra Cheeseman for supporting evidence.

#### *Preschool vs Long day care*

- The removal of dedicated preschools from the NQF (7.9)

It is well established that learning begins from birth. As such, an integration of education and care is regarded as fundamental to quality early learning experiences that support children's wellbeing, learning and development (OECD, 2001, 2006; Sylva, Melhuish, Sammons, Siraj-Blatchford, & Taggart, 2004). Removing preschools from the scope of the NQF sets up a false dichotomy and entrenches a longstanding bifurcation between preschool and long day care services (Cheeseman & Torr, 2009) that the NQF was helping to break down. A key strength of the NQF is that it provides a regulatory framework under which all early learning and care services are to operate. We believe that this strength should be maintained.

#### **Participants unanimously welcomed the following recommendations:**

12.2 The simplification of current subsidies and payments into the one Early Care and Learning Subsidy. We do however consider that the subsidy should be determined according to reasonable costs and not deemed costs (as per Brennan & Adamson submission 420; [file:///E:/2011/Service/Productivity%20CommissionReview/Forum%20presentations%20and%20notes/Brennan%20&%20Adamson\\_sub420\\_Feb2014.pdf](file:///E:/2011/Service/Productivity%20CommissionReview/Forum%20presentations%20and%20notes/Brennan%20&%20Adamson_sub420_Feb2014.pdf)).

#### 12.9 Continuation of the Universal Access program

##### **In sum:**

Key recommendations in the Draft Report are short term, quick fix solutions that if implemented, will significantly compromise the provision of quality early learning experiences for children in formal early childhood settings, and exacerbate entrenched workforce issues. We do not consider these recommendations to be in keeping with the Productivity Commission's role of enabling "governments (to) make better policies, in the long term interest of the Australian community" (Productivity Commission, 2014, p. ii).

We would like to draw the Commission's attention to the recent finding of Pricewaterhouse Coopers (2011), that "...The National Quality Framework quality standards are not ambitious, they fall short of the precedents set by ECEC systems overseas in terms of the qualifications required by early childhood staff and compare poorly with those quality standards that are taken for granted in the school education system". According to most recent OECD figures, as at 2009 Australia ranked 32<sup>nd</sup> from 34 partner countries on ECE expenditure as a percentage of GDP.

(<http://www.oecd.org/australia/EAG2012%20-%20Country%20note%20-%20Australia.pdf>). Policy initiatives to support children's equitable access to quality early learning and care experiences necessitate more substantive, long term investment, with due regard to children's rights, wellbeing and interests.

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**This submission has been endorsed by:**

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- Chris Legg, CEO / Board Member, KU Children's Services / Early Childhood Australia
- Deb Clarke, Children's Services Co-ordinator, UTS Child Care
- Denise Taylor, Board Member, The Infants' Home
- Eva Cox AO, Professorial Fellow, Jumbunna IHL, University of Technology
- Associate Professor Fran Press, Charles Sturt University
- Ginie Udy, CEO, SDN Children's Services
- Janelle Gallagher, Director, Kurri Kurri Community Preschool
- Jemma Carilse, CEO, University of NSW Child Care
- Jo Briskey, Principal Campaign Manager, The Parenthood
- Judith McKay-Tempest, Lecturer, Institute of Early Childhood, Macquarie University and Ministerial Advisory Council member
- Judy Kynaston, National Project Manager, Early Childhood Australia
- Leanne Gibbs, CEO, Community Child Care Co-operative
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- Dr Marianne Fenech, Senior Lecturer, Institute of Early Childhood, Macquarie University
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- Sylvia Turner, Director, Tigger's Honey Pot Early Years Centre, UNSW
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