

Productivity Commission Response – Sunshine Coast Children’s Professional Conversation Network

Who we are:

The Queensland Sunshine Coast Children’s Professional Conversation (CPC) network is a cross sectoral advocacy group. The membership comprises managerial level educators from Family Day Care, Long Day Care, School Age Care, and Inclusion Support as well as VET providers, Higher Education academics and early childhood consultants.

Introductory statement:

Whilst the CPC acknowledge that policy decisions are the key to good government practice, we believe the current review of the early childhood education and care profession, and the range of policy directives that underpin practices within the professional, will not serve in the best interest of children, families and educators. Of particular concern are the competing policy agendas within the government review of legislation and community benefit. The Productivity Commission Draft Report of *Childcare and Early Childhood Learning* is predominately focused on a human capital agenda that aims to increase Gross Domestic Product (as the Productivity Commission is charged with the responsibility to do). The agenda to **improve outcomes for children** as endorsed by the Council of Australian Governments in December 2009 and implemented under the National *Quality Framework* is sadly of lesser importance and focus in the review of early childhood education and care.

Our primary concern is that the raft of reforms introduced to provide children and families with the best start to life are at risk or appear to be highly compromised. If Australia is to continue to meet its obligations under the UN Convention of the Rights of the Child (UN, 1989) and improve its standing on the OECD measures then the Australian government must **put children first** in any agenda that impacts the lives of children and their families. It is our view that every child deserves access to quality education and care regardless of age, ability, location, cultural background, family demographic or socio-economic status. The recommendations in the Draft Report **do not consider the rights of children** – their health, well-being, development or learning. In fact, it appears that the funding for promoting healthy childhoods has been cut or reduced. This is contradictory to international research and evidence for best practice which outlines how *front-ending* funding and supports to children and families delivers long term benefits. A healthy society needs a range of family, education and care supports and policies that enable a work and family life balance – **valuing children and their parents**.

Also of concern is the division of care and education that is a continuing theme in the recommendations. All children receive care and education simultaneously from birth onwards. The suggestion that children under 36 months receive **care** by a lesser qualified adult and that children over 36 months are educated is offensive to children, families and educators. It is a retrograde step in early childhood education and care reforms and refutes international research, evidence and education best practice guidelines. For years our sector has struggled to be recognised for the valuable work we do with children and families. Since the introduction of the term educators a higher professionalism has been observed with in overall increase in a commitment to better outcomes for children. The introduction of the NQF has seen dramatic improvement in education and care resulting from that increase in professionalism and a commitment to professional and personal improvement leading to better outcomes for children. It can also be argued that education

and care cannot be separated as one cannot exist without the other. In caring for children they are being educated.

NQF -

Targeted response to Recommendations:

DRAFT RECOMMENDATION 5.2

Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

CPC response:

Integrated service delivery should be supported and funded in *all* communities. International and national research and evaluations of integrated support and service delivery demonstrate that taking a holistic approach to children's health, well-being, development and learning produces long term benefits – to the child, family community and economy. In contemporary Australian communities many parents are unable access the full range of child and family support services due to juggling multiple work-family priorities within business ours timeframes (Policy Brief No.3 2006). Integrated service delivery with extended/flexible hours of business is best suited to meet the needs of 21st century children and families. Integrated service delivery is a goal in the *Investing in the Early Years - National Early Childhood Development Strategy 2010-2020* (COAG, 2009). We suggest greater funding should be allocated to all communities and services to facilitate integrated family friendly service delivery.

DRAFT RECOMMENDATION 5.3

Australian Government ECEC funding should be limited to funding approved ECEC services and those closely integrated with approved ECEC services, and not be allocated to fund social services that largely support parents, families and communities. Any further Australian Government support for the HIPPY program should be outside of the ECEC budget allocation.

CPC response:

This recommendation appears contradictory to Recommendation 5.3. Integrated service delivery has a high impact on prevention and early intervention as well as holistic health, well-being, development and learning outcomes for *children* and families. International research highlights that funding early childhood initiatives and parenting programs has a cost benefit for communities and governments in the long term. We support the funding of parenting programs such as HIPPY.

DRAFT RECOMMENDATION 5.4

Early intervention programs to address the development needs of children from disadvantaged backgrounds should be underpinned by research. Their impact on the development outcomes of the children attending should be subject to ongoing monitoring and evaluation, including through the use of longitudinal studies.

CPC response:

There are a number of international and national longitudinal studies (AEDI, *Growing up in Australia: The Longitudinal Study of Australian Children*, *Australia's Children* and *Picture of Australia's Children*) that could be more widely used to inform policy and practice impacting all Australian Children. You support ongoing research, monitoring and evaluation in every Australian community.

DRAFT RECOMMENDATION 7.1

To simplify the National Quality Standard, governments and ACECQA should:

- *identify elements and standards of the National Quality Standard that can be removed or altered while maintaining quality outcomes for children*
- *tailor the National Quality Standard to suit different service types — for example, by removing educational and child-based reporting requirements for outside school hours care services.*

CPC response:

There is a lack of transparency in the Draft Report as to which parts of the NQS would be altered. Whilst a review of the NQF is welcomed it can be seen as discriminatory for services that have already been through the system if the system was to be changed prior to all services experiencing the process in its current state.

It is well known the regulatory authorities are currently overburdened under the existing system, however, it is only fair that all services have the opportunity to be assessed and rated under the same system. More resources are required to enable the regulatory authorities to meet the COAG targets that all services are assessed by June 2015. Altering the NQS for differing service types only serves to fragment the system and risks valuing some service types over other.

In regard to the concern on additional documentation required since the introduction of the NQF we note that only two elements of the NQS refer to documentation specifically. The increased documentation appears to be educators and nominated supervisors misconceptions about the quantity rather than the quality of the documentation required to meet the legislation and the elements. Whilst the quality of the documentation is to be applauded in some cases it is the educator's choice and a sign of the increased professionalism within the sector that has led to the increase in time spent on documentation.

Altering the NQS would devalue the research and body of literature that supports the design of the elements and the improved professionalism within the sector. We stand by the view that all children deserve quality education and care – regardless of age, location, service type, cultural background, family structure of socio-economic status

DRAFT RECOMMENDATION 7.2

Requirements for educators in centre-based services should be amended by governments such that:

- *all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent*

- ***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.***

CPC response: This diminishes the body of research that suggests the first years of life are critical for brain development, holistic development and quality of the environment relationship building. Neuroscience has proven that 85% of brain development occurs in the first three years of life. What happens in these early years determines outcomes for children's and the country's future. The COAG National Partnership Agreement was based on outcomes for children and the future productivity of the nation as a whole. By exposing children to the possibility of under skilled educators in the early years we are risking their future potential and that of the nation.

It has been said that every dollar spent in the early years is equivalent to seven dollars needed later in life. By holding the view that families can pay more for services offering higher qualifications of educators endangers our most vulnerable children who would not be able to afford the extra expense. There are children in education and care services from disadvantaged families, either through background, location and/or exposure to trauma; these children need more intensive support to assist them to overcome life's challenges so they would be distinctly further disadvantaged if they do not have access to high quality education and care.

This recommendation only serves to further divide the profession by delineating what is care and what is education and who are the recipients of care and education. Every child deserves to be supported by an early childhood teacher. Some Registered Training Organisations issue a Certificate III in three weeks with 120 hours practicum. Australia should be striving to achieve the qualification level for educators currently held by the OECD countries fairsing the best in all child focused and education outcomes i.e. a Bachelor or Masters level degree.

We ask the policy makers to further address these questions: Why are our youngest citizens afforded less consideration for their health, well-being, development and learning? Are children under 36 months less deserving of being supported, nurtured and educated by an educator with a qualification over AQF 6 level?

DRAFT RECOMMENDATION 7.5

To provide services with greater flexibility to meet staffing requirements, ACECQA should:

- ***remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months***
- ***explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.***

All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.

CPC response:

Every person holding a qualification for early childhood education needs to have rigor, depth and breadth across all age ranges. If educators are to professionally talk with parents about their children's holistic health, well-being, development and learning then they need to have a first-hand understanding and knowledge of development from birth to eight + years. The removal of the practical experience requirement is not supported by this group.

Staffing levels should never be compromised. Our youngest citizens deserve high quality safe, responsive education and care at all times. However, we do understand that in rural and remote communities and at some periods during the week the staffing ratios should be flexibly be considered. This would require place-based systems being negotiated with regulatory authorities.

RECOMMENDATION 7.6

Governments and ACECQA should:

- ***urgently reconsider the design of the assessment and ratings system, giving particular consideration to finding ways to increase the pace of assessments***
- ***explore ways to determine services' ratings so they are more reflective of overall quality***
- ***abolish the 'Excellent' rating, so that 'Exceeding National Quality Standard' is the highest achievable rating.***

CPC response:

Changing the NQF system, including the Assessment and Ratings system, before it has been fully implemented and evaluated is short sighted. Change takes time – this system has not had enough time to fully understand, analyse and/or critique the outcomes for children, families, communities or educators. We recommend that the full cycle of the NQF initiatives be fully implemented before radical changes are undertaken. Only researched and evidence based changes should be enacted. The *excellent* rating provides an aspirational level of achievement. If the *excellent* rating is removed it will reduce the likelihood of ongoing improvement and aspirational growth in the quality of services for **children**, families and educators.

DRAFT RECOMMENDATION 7.9

Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation. The quality standards in state and territory education legislation should broadly align with those in the National Quality Framework. Long day care services that deliver preschool programs should remain within the National Quality Framework.

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DRAFT RECOMMENDATION 12.9

The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program of 15 hours per week for 40 weeks per year. This support should be based on the number of children enrolled in state and territory government funded preschool services, including where these are delivered in a long day care service.

The Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool.

CPC response:

Not all jurisdictions would be advantaged by this recommendation. Currently, Queensland early childhood education and care services – in prior to school settings – are delivered by organisations other than the education department. The education department oversees the regulatory arrangements but is not a direct/front line provider of early childhood education and care. Removing ‘dedicated preschools’ (kindergartens in Queensland) from the NQF could cause disruption to the quality of children programs and outcomes. It would further divide the system of service delivery and funding arrangement in this state. Splitting programs offered in Long Day Care and ‘dedicated preschools’ under the NQF would only be divisive for the profession. Already there exist inequalities and perceived status differences within the early childhood education and care sector. Many of the Draft Report recommendations will only serve to further the perceived and actual inequities in employment status and conditions. Whilst a funding arrangement exist within Queensland government, we see the transferring the delivery of kindergarten programs to the education department could be a lengthy process that will not best meet the needs of children and families in the short term – or period of change. Ideally it would be desirable to have **all early childhood services** under the regulatory umbrella of the education department in all jurisdictions.

DRAFT RECOMMENDATION 8.4

The Australian Government should remove caps on the number of occasional care places.

CPC response:

We support this recommendation. In a community with many part time and shift workers and fly-in/fly out family employment arrangements occasional care is a much needed option. Sadly, it is rarely available and difficult to access. The Commission should examine measures to strengthen this service type.

DRAFT RECOMMENDATION 8.5

Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny.

National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services. Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.

CPC response:

Nannies offer flexibility in the service system. However, we suggest that there needs to be much more rigor and scoping in how this recommendation will be implemented. Nannies need to be supported

through professional development and engagement with other educators in order to enable ongoing quality improvement and learning.

DRAFT RECOMMENDATION 12.8

The Australian Government should continue to provide support for children who have a diagnosed disability to access ECEC services, through:

- ***access to the mainstream ECEC funding on the same basis as children without a disability and up to a 100 per cent subsidy for the deemed cost of additional ECEC services, funded from the Special Early Care and Learning Subsidy***
- ***block funded support to ECEC providers to build the capacity to cater for the needs of these children, funded through the Inclusion Support Program***

CPC response:

We question whether block funding would be best placed to support children with a disability. It would be at the discretion of the service to determine how the funding was distributed. This could lead to inequities in service delivery – or reducing the likelihood of some children having access to funded services and supports. We suggest the funding should be allocated on an individual needs based assessment of the best interest of the **child**.

DRAFT RECOMMENDATION 13.1

The Australian Government should continue support for the current block funded ECEC services for Indigenous children to assist their transition to mainstream ECEC funding (where there is a viable labour market).

Regulatory authorities should work with providers to assist them in satisfying the National Quality Framework and managing the transition to child-based funding arrangements.

CPC response:

Greater financial supports are needed to *close the gap* between outcomes for Aboriginal and Torres Strait Islander children, families and educators. The system needs to inject more funding into this area to meet our obligations under the UN Convention on the Rights of the Child and the UN Declaration on the Rights of Indigenous Peoples. We suggest that initiatives to offer professional development to all educators – particularly those in Aboriginal and Torres Strait Islander communities - be developed as a measure to meet a range of considerations and obligations to our First Nation peoples.

DRAFT RECOMMENDATION 13.2

The Australian Government should establish a program to link information for each child from the National ECEC Collection to information from the Child Care Management System, the Australian Early Development Index, and NAPLAN testing results to establish a longitudinal database.

Subject to appropriate data protection methods, this information should be made available for research, policy analysis and policy development purposes. The ability of researchers to access unit record information should be permitted subject to stringent privacy and data protection requirements.

CPC response:

We are comfortable that this type of research is already occurring. The Murdoch Children's Research Institute in collaboration with the Melbourne Royal Children Hospital & Centre for Community Health and the University of Melbourne are producing highly effective research outcomes. Other universities, academics and organisations (e.g. ARACY, AIHW, Benevolent Society) are ethically collecting data. There needs to be greater collaboration between researchers, policy makers and practitioners. Collaborative *research to practice initiatives* would greatly enhance the early childhood education and care service system resulting in better outcomes for **children** – and less taxpayer funding spent on three year cyclical policy reviews.