

Early Learning and Care Council of Australia Inc.

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**EARLY LEARNING AND CARE
COUNCIL OF AUSTRALIA**

SUBMISSION IN RESPONSE TO THE
PRODUCTIVITY COMMISSION'S
DRAFT REPORT ON THE
CHILDCARE AND EARLY CHILDHOOD
LEARNING SECTOR.

About this submission

The Early Learning and Care Council of Australia Inc. (the Council) is a recently formed association of large providers of early learning and care service across Australia. Our member organisations own and/or operate over 1,200 early childhood centres nationally. The founding members of the council represent a cross-section of some of Australia's largest private and not-for-profit providers.

The Council's member organisations are committed to delivering quality in early learning and care in Australia and ensuring quality early learning and care is accessible and affordable for Australian families.

The Council welcomes the opportunity to respond to the Commission's Draft Report into Childcare and Early Childhood Learning.

The Council agrees with many aspects of the Draft Report, however there are a number of recommendations that we believe, if implemented, will undermine the stated objectives of the Inquiry. The Council's response will outline these in the following six key areas:

1. The proposed Early Care and Learning Subsidy
2. Qualification requirements for educators working with children under three years of age
3. Payroll Tax Exemptions
4. Extending subsidies to nannies
5. Support for children with additional needs and vulnerable children
6. Preschool funding and delivery arrangements.

1. The proposed new funding model

Position

The Council supports the Commission's proposal to simplify the childcare payments system by moving to a single payment.

The Council support the proposal for a maximum rate of assistance set at 90% at an income level of \$60,000 tapering down to a minimum rate of assistance set at 30% at an income level of \$300,000.

The Council supports the actual level of assistance as being assessed against fees up to a cap, and that this cap should be set by reference to a benchmark price.

The Council does not support using an 'efficient cost' or 'efficient price' as the basis for determining the deemed cost or cap. The Council members deliver 1200 services nationally. Given the broad reach of the Council member services and the significant variability in service design, structure and mode, the Council believes that using an efficient cost or efficient price as the basis for determining a deemed cost will be complex, problematic and costly to Government to maintain. Given this context there is a risk that the cost or price determined will not accurately reflect the cost of service delivery and in doing so impact affordability and/or viability of services.

The Council suggests that the benchmark price should vary dependent on a number of factors:

- age of the child, as the cost of providing care to a child aged 0-3 is much higher
- number of children, families with multiple children in care face higher out of pocket costs;
- location, as costs and fees tend to be higher in some locations (e.g. metropolitan, particularly inner metropolitan areas) than in others (e.g. rural/regional areas and across states).

The Council supports providing a minimum entitlement of 22 hours (i.e. two days) of care for all children, exempt from the activity test but still liable to the Early Care and Learning subsidy (ELCS) means test.

The Council recommends that the maximum hours of assistance per fortnight should be 110 hours, reflecting a reasonable industry standard of 11 hours of operation per day, and noting that less than 20% of children are in full time care.

The Council recommend continuing to allow services to charge a daily rate and not be limited to charging for hours used, noting this approach would have the effect of pushing up costs to parents and operators.

The Council supports the subsidy being paid direct to provider, with improved, simplified electronic connectivity to the Government to reduce compliance costs.

Rationale

Our recommendations in relation to the new funding model are designed to ensure childcare remains affordable for families and also ensure the model is efficient for providers and Government. Simplifying the childcare subsidy system has the potential to deliver benefits and efficiencies for families, governments and service providers by making the system easier

to understand, reducing red tape and addressing some of the workforce disincentives of the current system (for example when families hit the Child Care Rebate cap).

We agree with the Commission's assessment of the risks associated with trying to build up a cost based model. The lack of available cost data and variability across the sector in terms of service size, age mix, overheads and labour arrangements would make building up an accurate efficient price almost impossible.

We believe that a benchmark price model, linked to fees has the benefit of being simple to administer and in a competitive market fees are a reasonable estimate of operating costs.

Overall the new system must ensure childcare meets the national minimum standards used by the vast majority of families is affordable.

2. Qualification requirements for educators working with children under three years of age

Position

The Council strongly rejects the Commission's proposal to water down qualification requirements for educators working with children aged birth to three years.

The Council strongly supports maintaining the existing qualification requirements for Diploma qualified educators for children aged birth to three years.

The Council strongly supports maintaining the existing Early Childhood Teacher qualification requirements for centre-based services.

The Council urges the Commission to consider the evidence presented by providers, educators and by early childhood experts which demonstrates the necessity of having Diploma qualified educators working with children from birth to three years of age.

Rationale

This recommendation has been overwhelmingly rejected by providers, parents and academics because:

- it is not based on the best available evidence
- it does not recognise the skills required to deliver quality 'care' and is not workable in practice
- it does not recognise that learning occurs from the first year of life
- its implementation would put providers at risk breaching general standards and expectations related to child safety, supervision and duty of care
- parents need confidence in the quality of care and supportive learning environment if they are to return to work.

There is sufficient evidence that supports the existing requirements and critically, we note that there is no robust evidence that supports removing these requirements. In particular we draw the Commission's attention to evidence documenting the importance of the first three years in terms of brain development and further, that children's learning in the first three years sets the foundations for preschool, primary school and further life education. We also refer the Commission to the joint submission that has been lodged by Australia's professors of Early Childhood Education, and we commend their evidence to the Commission's attention.

In terms of the skills required to deliver quality care, the Council's strong advice is that the proposal is unworkable and unreasonable. It will take the sector back thirty years and will compromise the quality of early learning *and* the quality of safety and care for very young children. Prior to the National Quality Framework (NQF) all states (in some form) required that Group Leaders (i.e. those educators in charge of a room of children) had to hold a Diploma level qualification. This long standing requirement is based on the practical necessities to meet our statutory obligations to provide a safe environment for children. A Diploma level minimum qualification ensures that the educators in charge of rooms for very young children have the minimum skills required to keep children safe and support their learning. Drawing on our collective experience running more than 1,200 services, we absolutely reject the suggestion that a Certificate III is an appropriate minimum qualification to perform these functions.

Finally, parents must have confidence in the service, not just from a point of view of safety but also their child's development. We know from our own interactions with parents and our parent surveys that parents are deeply concerned around reducing staff qualification requirements and ratios that might impact in those under-three years. It would not be reasonable to ask parents to pay more in order to meet what we consider should be the minimum standard for qualified educators working with children under three years.

We have attached a description of the units of competency in a Certificate III and a Diploma course which clearly demonstrate that the Certificate III course is designed to provide the skills of an assistant supervised by a more qualified (i.e. Diploma qualified) educator. (Appendix A) We have also attached a list of references in support of the proposition that qualifications and quality support learning outcomes in children aged birth -three years (Appendix B).

3. Payroll Tax Exemptions

Position

The Council proposes that all providers of early childhood education should be exempt from payroll tax as the least disruptive means of leveling the playing field.

Rationale

The Commission's argument that removal of the payroll tax exemption for not-for-profit providers on the basis that it will create a level playing field simply does not hold up to scrutiny and is narrowly focused. The Commission's analysis shows that around half of all services are owned by organisations that own only one service. They would continue to be exempt from payroll tax. Further, services are owned by State and Local Governments, schools, churches and public benevolent institutions are captured under separate payroll tax exemptions which are likely to continue.

The removal of the payroll tax exemption will likely result in:

- a further distortion in the market as there will still be many providers exempt from payroll tax, both for profit and not for profit
- increased fees or reduced services as the large not-for-profit providers would need to meet an effective increase in labour costs of around 5 per cent. This would particularly impact on service provision in rural and regional areas where occupancy levels tend to be lower.

The Council hold the view that for the Commission to achieve its intended outcomes of a more level playing field and competitive neutrality in respect of payroll tax exemptions, the least disruptive approach would be to advocate that the exemption should be extended to cover all Early Childhood Education and Care (ECEC) service operators both for profit and not-for-profit sector.

Since the National Strategy for Early Childhood Education was signed by all governments in 2009, the ECEC sector has been recognized as providing a crucial foundation stage in learning and education in Australia. By contrast to the schools sector, most of the ECEC sector is privately owned, but still expected to help deliver national ECEC policy objectives.

Schools are exempt from payroll tax and increasingly providing ECEC services on school grounds. It would, therefore, be anomalous and administratively cumbersome for a school to be exempt from payroll tax but the kindergarten or early learning centres attached to it be subjected to payroll tax.

There are some parallels between our suggestion and the approach taken by all state and territory governments with respect to other payments towards "social goods". Prior to payroll tax harmonisation in 2008, payments made by all employers in respect of parental leave, volunteer leave and jury leave were treated as taxable in some jurisdictions and exempt in others. With the push towards harmonisation, the relevant state and territory governments opted to universally exempt these payments rather than subject them to tax. A similar argument can be made for the "social good" that is the provision of ECEC services, regardless of the status of the operator.

PC data shows that 60% of all centres (long daycare and preschool) are not for profit and, therefore, exempt from payroll tax. Of the remaining 40% of centres that are privately owned, PC data suggests up to half are likely to be standalone operations that would be likely to fall below the payroll tax thresholds in each jurisdiction. This leaves only around 20% of

the sector (privately owned centres where the operator owns two or more centres) liable for payroll tax. Removing payroll tax for this group would be the least disruptive means of meeting the PC's objective of leveling the playing field for all operators.

The removal of the NFP exemption could extend the current barrier to growth reflected by the payroll tax thresholds and create diseconomies of scale for larger operators/operators seeking to grow.

Finally, it should be noted that the Commission's modeling shows that a reduction in net childcare prices is likely to result in an increase in employment. This provides a further benefit for the states in terms of increased collections of payroll tax collections, and a strong case can be made that the states should contribute some of this windfall in tax collections back to easing cost pressures in the sector.

4. Extending Funding to Nannies

Position

The Council does not support the Commission's recommendation to extend childcare assistance to nannies.

Rationale

The Council is concerned that extending subsidies to nannies will have significant consequences for the remainder of the ECEC sector that have not been adequately considered by the Commission:

- it could increase challenges the ECEC sector already faces attracting and retaining quality educators who wish to forge a career and commit themselves to raising the quality of early years education in Australia;
- there would be an immediate drain of qualified educators from centres which is likely to be most marked in higher income suburbs where staffing shortages are already more noticeable
- increasing the number of children in the care of Certificate III qualified educators without the oversight and support of Diploma and Degree qualified educators will lead to an overall decline in the quality of care, safety and early learning in Australia. We believe the nanny environment is not one that will support or encourage the educator to further their education and pursue professional development as there will be no incentive to increase qualifications.
- a shift towards nannies would see more qualified staff caring for less children in aggregate. This would lead to an inefficient use of an already scarce human resource. More pressure on the staff pool could lead to a reduction in Long Day Care (LDC) places available.
- nannies and in-home care is also the least cost effective delivery model for childcare. A 1:1 or 1:2 ratio is affordable and feasible for high-income families but is an inefficient use of scarce tax-payer dollars. LDC's deliver a much more efficient service for Government.
- challenges replacing qualified staff, could have two possible consequences higher labour costs possibly passed on to families in the form of higher fees (due to a reliance on agency or casual staff or having to offer higher wages to retain educators) and/or reductions in places available if suitable replacement staff cannot be found.

It is difficult to envisage how nannies could be effectively and/or efficiently regulated, particularly if parents can engage a nanny directly as proposed by the Commission. The Council is of the view that the Commission's proposal of ensuring compliance to NQF requirements is impractical and costly as:

- the cost to government of regulating nannies would be significant. We also note that poorly regulated nanny services could potentially pose a risk to the quality of care and safety for children. Significant State Government funds would be required to support an appropriate compliance regime given the following factors:
 - a new area of regulation for the states (or the Commonwealth)

- a dispersed workforce with tens of thousands of individual nannies to monitor (currently around 45,000)
- nannies operating in individual homes, some directly engaged by families and
- massive and rapid expansion expected almost immediately upon expansion of subsidies.

Failure in this area could lead to significant abuse of the system, leading to misdirected Government funding, poor educational outcomes for children and potentially putting children at risk.

Providing subsidies for nannies should not be a first order priority for childcare investment as it will deliver limited additional workforce participation and learning and development outcomes for children relative to other priorities. Many parents are already working and paying for a nanny.

Instead of funding nannies, priority should be given to making the existing service system more efficient and reducing barriers to supply in areas of high demand such as addressing Local Government Planning regulations.

5. Special Needs and Vulnerable Children funding

Position

The Council supports the Commission's broad recognition of the need to provide support for children with additional needs or who are developmentally vulnerable as these children stand to gain the most from access to high quality early learning and care environments.

The Council supports demand driven subsidies for children with additional needs because we owe it to the most vulnerable and disadvantaged children to ensure they can access early learning and care.

The Council supports all children having access to a base entitlement to early learning and care, regardless of their parent's employment status noting that this is in the best interest of children.

The Council notes that the Special Education and Care Learning Subsidy (SECLS) must cover the full cost of delivering the additional needs support to children, specifically, the subsidy must fully fund the wage of the educator and must fully fund all hours the child is in attendance.

The Council recommends that the Commission examine opportunities to streamline and simply access to early learning and care for children at risk of abuse and neglect in a timely manner. The Council also urges the Commission to make recommendations that reduce the complexity and administrative hurdles that present as barriers to providers sustaining the participation of at risk children in ECEC, reducing the time between recognition of risk and provision of support.

The Council supports the intent behind the Disadvantaged Communities Program and recommendations for integrated services but notes that funding for these programs appears to be inadequate to provide services beyond remote Indigenous communities.

The Council recommends the Commission carefully consider which vulnerable families will miss out because of its proposed changes to eligibility for the new streamlined ECLS and the SECLs, noting that member submissions will provide more detail on these issues.

Rationale

We commend the Commission for acknowledging the benefits of access to early learning for these children. A system wide response is needed to ensure that the children that stand to benefit most from early learning and care are able to attend. We would argue that strengthening the universal platform is the best way to tackle disadvantage and also support children and families with additional needs. Building the capacity and capabilities of our universal service platform will have flow-on effects to tertiary and secondary service systems as well as general societal costs. There's an enormous opportunity to realise benefits for children but also productivity gains that are reaped in other service systems that are under pressure at the moment, like local community and health services.

The current proposal to remove access to subsidised care for nearly 100,000 children due to their parent's employment status must be rejected. We should be moving to expand access to quality early learning, not to limit it. Our international competitors are providing, or moving to provide universal access to quality early learning, especially for vulnerable and low income children. At the very least, current entitlements must be retained.

Further, it would not be equitable to provide ‘capped and rationed’ access for the most disadvantaged children while providing uncapped demand driven access for other children. On an individual child level, the funding delivered by SECLS must fully cover the cost of support children with additional needs to participate, and all eligible children should receive their entitlement.

Addressing these two structural issues would go a long way to removing the current disincentives for service providers to embrace and include children with additional needs and vulnerable at-risk children. At the moment providers bear additional costs for including children with disability and children at risk may fall in and out of being eligible for the Special Child Care Benefit.

If the Integrated Services Program proposed by the Commission was adequately funded, it would provide a new opportunity to ensure vulnerable and at risk children could genuinely receive the support they needed. Childcare services are in almost every community and could provide a base to deliver more comprehensive support to meet the complex needs of vulnerable children and their families. This could include counseling, access to domestic violence services, health services or cultural support.

6. Preschools

Position

The Council supports the Commission's recommendation for the Federal Government, in partnership with the States, to continue to fund a minimum of 15-hours of kindergarten education delivered for 40 weeks in the year prior to the commencement of school.

The Council support the Commission's recommendation that Federal funding should be provided to all providers of preschool programs, including those in long day care centres.

The Council believes that there is a good case for extending the subsidised Universal Access Program for preschool to include 3-year old children and increased access to a second year of four year pre-school, particularly children who are vulnerable.

The Council does not support the recommendation to remove "dedicated preschools" from NQF to be instead regulated under state-based education legislation.

Rationale

We commend the Commission for acknowledging the benefits of preschool.

As a result of the 2008 National Partnership Agreement on providing Universal Access to Preschool and the investment of \$970 million over five years¹, Australia's significantly improved its OECD ranking on early years education, but there is more to be done. Many children who would stand to benefit most from preschool still miss out and cost remains a barrier to access for many children.

To ensure all children can benefit from preschool, the Commission's final recommendations must ensure preschool is accessible, affordable and of appropriate quality.

Preschool delivered in LDC settings meets the needs of many working families. Providing LDCs with access to Commonwealth Universal Access funding will ensure working families have more choice and flexibility in how their children access a preschool program.

Preschool programs must meet the quality requirements outlined in the NQF to ensure the benefits of high quality preschool are realised. A split of preschool regulation as proposed would unwind moves over the last several decades to bring care and education together and would create a two tiered preschool system.

Access to preschool must be affordable. In order for preschool programs delivered in LDC settings to be affordable, families must be able to access childcare subsidies for all hours of the day. In states where Universal Access funding is provided, the quantum is not sufficient to fully cover the cost of delivering the preschool program. Removing access to childcare subsidies would dramatically increase the cost of preschool for working families.

The Council does not support the proposal to eventually shift preschool into the school system. This would be an inefficient use of existing infrastructure and underestimates the complexity of the current service system. Instead, funding arrangements should focus on promoting choice and flexibility for families while ensuring cost is not a barrier to access, particularly for low-income families and vulnerable children.

APPENDIX A - Differences between a Certificate III and Diploma qualifications

CERTIFICATE III UNITS	DIPLOMA UNITS	
18 units Part time—1 year Nominal hours: 810	28 units Part time—2 years Nominal hours: 1,670	Differentiation of correlating units within Certificate III
Work within a relevant legal and ethical framework	<i>Same</i>	These units sit within both Certificate III and Diploma programs
Develop cultural competence	<i>Same</i>	
Ensure the health and safety of children	<i>Same</i>	
Provide care for children	<i>Same</i>	
Promote and provide healthy food and drinks	<i>Same</i>	
Provide care for babies and toddlers	<i>Same</i>	
Develop positive and respectful relationships with children	<i>Same</i>	
Use an approved learning framework to guide practice	<i>Same</i>	
Identify and respond to children and young people at risk	<i>Same</i>	
Provide an emergency first aid response in an education and care setting	<i>Same</i>	
Work effectively with Aboriginal and/or Torres Strait Islander people	<i>Same</i>	
Participate in work health and safety	Maintain work health and safety	The Diploma-qualified educator has the skills and knowledge required to implement and monitor work health and safety (WHS) policies, procedures and work practices as part of a small work team. The Diploma unit applies to workers who have a key role in maintaining WHS in an organisation, including duty of care for other workers. At a Certificate III level, the educator is working under direct supervision or with some individual responsibility, following policies and procedures.
Support the holistic development of children in early childhood	Foster the holistic development and wellbeing of the child in early childhood	The Diploma-qualified educator has the knowledge and skills to foster and enhance the holistic development and wellbeing of children from birth to 6 years of age, whereas at the Certificate III level, the educator is able to recognise and support the interrelationship of areas of development, at a basic level.
Use information about children to inform practice	Analyse information to inform learning	The Diploma unit contains the skills and knowledge required to gather and analyse information about children’s learning in order to inform practice,

CERTIFICATE III UNITS	DIPLOMA UNITS	
		whereas Certificate III-qualified educators have the knowledge and skills to observe and understand children's learning and development at a basic level enabling them to ' contribute ' to program planning.
Provide experiences to support children's play and learning	Design and implement the curriculum to foster children's learning and development	Diploma-qualified educators would have the ability to gather rich information about each child and groupings of children. The Diploma-qualified educator would be able to analyse and understand children's learning, development and wellbeing. A Certificate III-qualified educator is able to assist in creating environments to support children's play and learning.
Support children to connect with their world	Embed sustainable practices in service operations	Certificate III-qualified educators would gain skills and knowledge required to support and encourage children's connection with their environment. In addition to these skills, Diploma-qualified educators gain the skills and knowledge required to educate children in contributing to their world, and embed sustainable practice into the service operations.
<i>Not included in Certificate III</i>	Nurture creativity in children	Promote creativity and to allow children to communicate their understanding of their world and construct knowledge through a range of mediums
<i>Not included in Certificate III</i>	Facilitate compliance in an education and care services	Analyse the service's compliance under the applicable legislative and regulatory requirements, including the National Quality Standards, develop strategies and facilitate improvement as outlined within the service's quality improvement plan.
<i>Not included in Certificate III</i>	Establish and implement plans for developing cooperative behaviour	Identify challenging behaviours to enable early intervention, and conduct thorough analyses of external factors contributing to these behaviours. Develop plans and strategies to support these children. Guide Certificate-qualified educators in their practices to support the child.
<i>Not included in Certificate III</i>	Implement strategies for the inclusion of all children	Support children with diverse needs including children with disabilities. Develop learning and care programs that support children to be successful learners and receive quality care meeting their additional rights.
<i>Not included in Certificate III</i>	Promote children's agency	Diploma-qualified educators would have the knowledge and skills required to promote and encourage children's agency.
<i>Not included in Certificate III</i>	Establish and maintain a safe and healthy environment for children	The Diploma-qualified educator requires the higher level knowledge and skills enabling coordination of processes, evaluation of situations, monitoring, and coordination of responses and processes.
<i>Not included in Certificate III</i>	Work in partnership with families to provide appropriate education and care for children	Develop positive and respectful collaborative relationships between the service and families, and ensure the service is working in partnership with the family to provide the best possible education and care for the child.

Appendix B - Impact of quality early learning on children aged birth to 3 years: some research references

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ⁱ Parliament of Australia (2014). Universal access to early childhood education: a quick guide