



Productivity Commission Inquiry into Childcare and Early Childhood Learning

Submission from the South Australian Government

October 2014

SUMMARY

The South Australian Government, through the Department for Education and Child Development (DECD) as the service provider of early childhood services and the state early childhood policy lead, is pleased to make this submission in response to the draft report of the Productivity Commission Inquiry into Child Care and Early Childhood Learning.

This submission focuses on issues relating to quality, accessibility, flexibility, meeting the ongoing needs of vulnerable and disadvantaged children and families, cost and workforce. In addition, this submission provides information about the key research evidence that has influenced South Australia's leadership of high quality public early childhood education and care.

The submission does not specifically comment on national policy matters to which the South Australian Government has already contributed through national governance structures, including matters that are being progressed through the 2014 Review of the National Partnership Agreement (NPA) on the National Quality Agenda (NQA), including an examination of:

- whether the NQF has improved the efficiency and cost effectiveness of regulation of services and reduced the regulatory burden for providers and regulatory authorities
- the effectiveness of the assessment and rating process
- governance arrangements for the NQF including the role of the Australian Children's Education and Care Quality Authority (ACECQA).

South Australia supports an approach whereby improvements can be made nationally to interagency responses to early childhood, particularly birth to three years, across health, education and community services.

South Australia strongly supports a coordinated and comprehensive approach to research and development for the early childhood sector, with current levels of investment low compared with other industry sectors. Higher quality Australian data on the precursors, correlates and trajectories of children's development would enable better evidence-based design of policy and program options.

The Productivity Commission recognises that governments in Australia provide considerable support to the operation of the early childhood education and care market as policy makers, funders and regulators of the sector but also as providers of services. The main rationale for government intervention is to enhance learning and development outcomes for children and to generate broader social and economic benefits.



The Organisation for Economic Cooperation and Development (OECD) in its report '*Starting Strong II*' states that early childhood education and care contributes to the public good, for example, to the health of children, to future educational achievement and to labour market volume and flexibility. Early childhood services are also subject to market failure and in market situations services may be subject to shortages and low quality – strengthening the case for government intervention and provision of services.

1. INTRODUCTION

South Australia has a proud history as a national leader in early childhood development recognising the value and potential of every child and young person, the primary role of parents and carers in the development of the children and young people in their care, the importance of the first five years of a child's development and the need for services and the broader community to work together to achieve the best outcomes for children, young people and their families.

The Department for Education and Child Development (DECD) leads the public education, care, child health and child protection system in South Australia and aims to support every family so all young South Australians from 0-18 years of age have the opportunity to become happy, healthy and safe members of our community. DECD works with all families early in their journey to support parents and ensure the individual needs of each child are met.

DECD provides the following services to children and families in South Australia:

- preschool education, family day care, children's centres, occasional care, rural care and out of school hours care
- health and wellbeing services for families
- South Australia's public education system.

Every week day, more than 180,000 children and young people across our State attend public schools or early childhood settings.

In relation to child care and early childhood learning, DECD has two distinct roles: one as the South Australian policy lead for children and young people and the other as the largest service provider of early childhood services in South Australia.

Attachment 1 provides information about DECD's role as an early childhood education and care service provider in South Australia.



2. THE GOVERNMENT OF SOUTH AUSTRALIA'S VISION – EVERY CHANCE FOR EVERY CHILD

Improving the lives of all children and ensuring Every Chance for Every Child is one of the South Australian Government's seven key priorities for South Australia's future. It focuses on supporting and strengthening South Australian families and children to achieve their best. Our vision is that:

- South Australia will be recognised nationally and internationally as a family and child-friendly state – a great place to live and raise healthy and creative children.
- Young South Australians will thrive in a world where they are safe to play, create, live and learn on their pathway to a strong future.
- All parents will receive a range of services and practical information starting from before a child is born, to ensure their baby is developing well and to help nurture healthy, capable and resilient children.
- All children will have access high quality, affordable child care and preschool offered by trained staff using a rigorous curriculum. Those who work with young children will be a recognised and valued group of early childhood development professionals.
- Community hubs at schools will offer services aimed at supporting families and children from the time they are born. All families will have access to a children's centre in their local area.
- Children and families will be supported through early intervention services as the need for assistance arises. When children are not able to live with their birth families, we will protect and nurture them to live productive and healthy lives.
- The State will have realised the benefits of investing early in children and families and will have saved from having a safer community with better health outcomes, less inequality, improved social cohesion and greater opportunities for the next generation.
- South Australia will be recognised as an international leader in child development research in the early years, and as a place that respects the role children play in society.

While all South Australian Government agencies are contributing to this priority area, DECD is the lead agency for this priority.

3. THE IMPORTANCE OF THE EARLY YEARS

The South Australian vision is underpinned by compelling evidence that investment in the early years before children start school has the greatest return for human development and that the advantages gained from effective early childhood development and wellbeing investments are much greater than later investments.



The South Australian Government Adelaide Thinker in Residence program has been influential in developing a systemic approach to improve outcomes for young children in South Australia. Through these residences both the late Dr Fraser Mustard and Professor Carla Rinaldi have shaped the South Australian early childhood approach to:

- encouraging the consideration of outcomes for children and young people in all relevant government policies, with a general duty for State authorities to cooperate in developing policies in areas that affect the development and wellbeing of children and young people
- establishing an integrated approach to the development and wellbeing of children and young people, with a particular focus on services and structures relating to the health, learning and participation of children and young people, and the social, economic and environmental factors which affect their development
- coordinating systems and structures that encourage an holistic view of the development and wellbeing of children and young people across professional disciplines, services and regions
- establishing agreed key principles that inform and support the work of government and non-government organisations to create a more effective and connected approach to the development and wellbeing of children and young people
- strengthening information sharing practices across government and non-government organisations to enhance the quality of care and service delivery to improve outcomes for children, young people and their families
- improving the capacity of the community to provide environments conducive to the development and wellbeing of children and young people.

In addition South Australia is aligning its efforts with the UNICEF Child Friendly Cities Framework, which underpins the government's commitment to a Child Friendly South Australia initiative. The Child Friendly SA initiative seeks to define, continuously monitor, measure and improve outcomes for children, young people and their families.

4. CHILDREN'S EARLY LEARNING AND DEVELOPMENT RESEARCH

The models for child care and preschool education provided by DECD in South Australia are informed by contemporary research about children's development and learning in their earliest years.

4.1 Attachment/Relationships

Children with positive attachment are well positioned for learning as they are open to new experiences and have high self-esteem, are resilient and empathic. Based on the work of Ainsworth and Winnicott in the 1950s, the Circle of Security Parenting program (Hoffman, Marvin, Cooper & Powell, 2006, 2013) has been implemented throughout health and education services across the state. This work emphasises the importance of attending to a child's need for connection and encouraging their exploratory drive.



4.2 Parental influence in early learning

There is a growing and persuasive body of research that demonstrates the critical importance of parental involvement in children's learning from birth (Desforges & Abouchar, 2003; Gutman & Feinstein, 2007). Children develop their dispositions to learning from birth in the family setting. Developing dispositions such as being curious, resourceful and purposeful and persistent sets children up as effective learners.

4.3 Home learning environment

The importance of the Home Learning Environment (HLE) has been well demonstrated particularly in the longitudinal EPPE and EPPSE studies in the United Kingdom (Sylva et al, 2004; Siraj-Blatchford et al, 2011). A positive HLE can override the traditional factors linked with poor outcomes for children such as poverty.

Supported playgroups, such as Learning Together and Playgroups in Schools (PinS), have been developed in South Australia to engage families early, and through play, with their children's learning. Given the critical role parents play in their children's early learning providing a range of supports to enable parents to fulfil this role is a central part of an effective early childhood and care system. Regardless of whether parents are working, studying, looking for work or on parenting leave, access to social supports and networks such as supported playgroups and new parent groups are an important part of growing parent confidence and supporting healthy child development.

4.4 Impact of qualifications on quality care and education

Research has demonstrated that qualifications are a driver of quality and correlate positively with better outcomes particularly in pre-reading and in social development at age 5 (EPPE). Qualifications are important both for educators working directly with children and for those leading or managing an early learning service. Effective qualified educators have knowledge of curriculum and development, engage children in shared sustained thinking, support conflict resolution, have educational goals for children and support parents to be engaged in their children's learning.

4.5 Attendance at Preschool

Preschool shows a significant positive effect on early cognitive outcomes for all levels of quality and duration (in years) compared with none. High quality, high duration of attendance is important especially for under-3 year olds. Aboriginal children who attend preschool for more than a year show a statistically significant performance advantage in later school achievement than those without preschool attendance (OECD 2004).



Research from the Effective Provision of Preschool Education (EPPE) longitudinal study in the United Kingdom indicates that preschool can play an important part in combating social exclusion and promoting inclusion by offering disadvantaged children in particular a better start. The findings indicate preschool has a positive impact on children's progress over and above important family influences. The quality of the preschool setting experience as well as the quantity are both influential factors.

4.6 Best practice approaches to teaching in the early years

Quality early childhood settings are characterised by clear and dynamic visions and leadership, high adult/child interactions that support children's thinking, offer child initiated and adult extended play, support relationships between children, understand that cognitive and social development is complementary, offer playful learning building on children's interests, have well trained and qualified staff and invest in staff development and culture (EPPE).

4.7 Transition to school

Transition to school is a significant time in the lives of all children. It is clear from research that a child's 'adjustment to the first year of school and the patterns of behaviour and achievement established during this period, have important implications for the trajectories of future academic and social success' (Dockett & Perry 2004b).

5. COMMENTS ON THE RECOMMENDATIONS IN THE DRAFT REPORT

5.1 Families using mainstream services – improving accessibility, flexibility and affordability

The Productivity Commission has made a number of recommendations which it states are designed to improve the accessibility, flexibility and affordability of child care and early childhood learning services for families. Recommendations include:

- one means-tested subsidy, based on a deemed cost of delivering a service, available for centre-based ECEC services and all home-based services which satisfy the appropriate NQS (recommendations 12.2, 12.4)
- support of up to 100 hours of care per fortnight for children of families that meet an activity test of 24 hours of work, study or training per fortnight (recommendation 12.4)
- exemptions from the activity test for non-parent primary carers and jobless families where the parents are receiving a Disability Support Pension or a Carer Payment (recommendation 12.3)
- abolishing minimum or maximum operating weeks or hours for services approved to receive child-based subsidies (recommendation 8.3)
- removing the cap on occasional care places (recommendation 8.4)
- approved nannies to become an eligible service for which families can receive ECEC assistance, with NQF requirements for nannies, including qualifications and staff ratios to be determined by ACECQA (recommendation 8.5).



DECD provides a range of models of education and care including school based preschools, stand-alone preschools, children's centres, Aboriginal children and family centres, rural/remote preschools, rural care, family day care, play centres, crèches, supported playgroups and Birth to Year 12 schools. This deliberate mix of a range of models enables availability and accessibility to children and families and system capacity to respond to a range of needs and allows flexibility for families while responding to the diverse nature of communities across South Australia.

The recommendation to abolish minimum or maximum operating requirements for a service to be entitled to the proposed Early Care and Learning Subsidy (ECLS) is supported. However further clarity is sought as to whether services such as care before and after preschool and on non-preschool operating days could become an eligible service for the purposes of the subsidy. The South Australian Government would be strongly in favour of this as it would provide further flexibility for families to access affordable care before and after preschool thereby improving accessibility to preschool.

The South Australian Government supports the recommendation to abolish minimum or maximum operating requirements for a service to be entitled to the proposed ECLS.

The South Australian Government supports access to the ECLS to encourage services to provide before and after preschool care thereby improving accessibility to preschool.

Family Day Care as a service type is well placed to deliver increased flexibility to parents and families where centre based hours of operation are not suitable. DECD Family Day Care already supports families with non-traditional work hours by providing non-standard hours of care including evening, overnight and weekend care.

The South Australian Government supports further system flexibility through the expansion of in-home care options where the care is undertaken in the child's own home. This may include nannies where they meet the National Quality Standards, have a minimum qualification and the same staff ratios as are currently present for FDC along with the need for assessment of regulatory compliance. This could be particularly beneficial to children with significant additional needs, for families with a number of siblings or multiple births, families with non-standard work hours or for families who prefer an in-home option for their child/ren.

The South Australian Government supports a more flexible home-based care service that incorporates FDC in the child's home as well as nannies.

The South Australian Government supports a requirement that nannies meet the National Quality Standards, have a minimum qualification and the same staff ratios as are currently present for FDC along with the need for assessments of regulatory compliance.

Regardless of whether care is provided in a home or centre based services, the elements of quality service provision must be present:

- qualified educators
- well trained staff engaging in current professional learning



- strong leadership for children's learning
- understanding by educator of how children learn
- high adult:child ratios.

The South Australian Government notes that a single means-tested subsidy will simplify the system and reduce current confusion for families and the administrative burden for both ECEC services and families.

The South Australian Government strongly supports continued access to the subsidy for all non-working families, not just those who meet the exemption criteria detailed in the draft Productivity Commission report.

It is noted that currently, non-working families can access 24 hours per week of subsidised child care. Research shows that disadvantaged and vulnerable children gain the greatest benefits from participation in high quality child care, with a minimum of two days access per week required for positive change to be experienced. The cost of child care however often means children who would benefit the most from accessing this service are the ones that miss out.

The Wyatt Benevolent Institution Inc has partnered with some of South Australia's Children's Centres for Early Childhood Development and Parenting to support eligible families with the cost of child care. Wyatt Benevolent Institution Inc provides financial assistance to children and families across South Australia. It recognises parents as the first educators of their children and offers families opportunities through financial support to enhance their children's early experiences. Children's Centres provide an environment that promotes a quality program for children and parenting programs. These two services have come together to support local families with their child care and parenting needs.

In 2013, the Wyatt Benevolent Institution Inc continued to provide Children's Centres Early Childhood Scholarships to 20 eligible families at Hackham West, Elizabeth Grove Community Campus and at Ocean View College.

The Children's Centres Early Childhood Scholarship provides financial assistance to eligible families to support the cost of child care for two days per week by paying the out-of-pocket expenses for families.

The scholarships are designed to encourage learning and build on the safety and well-being of young children and the strengths of their families who experience hardship by:

- promoting positive early development for children under school age through access to regular play activities
- improving parents' or caregivers' knowledge, skills and capacity for parenting and sustaining family wellbeing
- engaging families in activities that target the social, emotional, physical and sensory development of children.



The South Australian Government notes that initiatives in South Australia designed to support children and families by providing subsidised child care could be at risk if subsidised care is not available for all non-working parents.

5.2 Additional needs children and services – improving accessibility, flexibility and affordability

The Productivity Commission has made recommendations designed to support accessibility, flexibility and affordability for children ‘at risk’ or with additional needs including:

- a ‘top-up’ subsidy to meet the additional reasonable costs of services for children at risk or with a diagnosed disability, up to a 100% subsidy (recommendation 12.6)
- a Disadvantaged Communities Program to block-fund providers to deliver services to specific high disadvantaged communities and coordination in integrated services where ECEC is the major element (recommendation 12.6)
- an Inclusion Support Program to provide once-off payments to ECEC providers to build the capacity to provide services to children with additional needs including modifications to facilities and equipment (recommendation 12.6)
- a 100% subsidy for the deemed cost for children assessed as ‘at risk’ to access ECEC services, with no activity test and support for 13 weeks initially, up to 26 weeks (recommendation 12.7)
- continued support for block funded ECEC services for Aboriginal children to assist their transition to mainstream ECEC funding (recommendation 13.1)
- governments to plan for greater use of integrated ECEC and childhood services in disadvantaged communities (recommendation 5.2)
- capped ‘viability assistance’ to assist ECEC providers in rural, regional and remote areas to continue to operate under child-based funding arrangements should demand temporarily fall below that needed to be financially viable, accessed for a maximum of three out of seven years (recommendation 12.5).

DECD has successfully provided a number of programs and services within preschools and Children’s Centres to support meeting the needs of vulnerable and/or disadvantaged children. Strategies have included early entry for three year old Aboriginal and Torres Strait Islander children and children in the care of the Minister. These children are able to access 15 hours of preschool from the time they turn three until they commence school. Early entry provisions also apply for children with disabilities or learning difficulties and children from other cultures with English as second language.

Specific programs within preschools have been provided for priority populations such as the Aboriginal Family Literacy Strategy, Inclusive Preschool Programs, Occasional Care, Child and Youth Health services either through long standing co-location within preschools and also through visiting services in metropolitan, rural and remote locations.



The early childhood education and care system would benefit from an increased capacity to attend to the needs of disadvantaged and vulnerable children. This would include options for fully subsidised attendance at quality childcare and preschool programs so that cost or affordability is not a barrier to access and priority access to a child care or preschool place is required. This would also include access to preschool education in the two years before school.

Increased flexibility in the funding system would enable service providers to respond more effectively and in a timely manner to emerging needs.

Support for children with a disability or 'at risk'

Currently child care services, through Special Child Care Benefit, can support a family in crisis for up to 13 weeks before seeking further approval. This provides a fee free service to families who are at risk and do not have the capacity to pay for child care.

The proposed Special Early Care and Learning Subsidy (SELCS) would cover 100% of the 'deemed cost' of care amount. This would mean most families would continue to pay a reduced fee. For families in crisis the current fee free service makes the difference to the wellbeing of the whole family. The current 13-week subsidy has been able to support families to a point where children are accessing and attending preschool on a regular basis. If a fee remained payable, however small, it would likely make the difference between a family starting care or not.

Consideration also needs to be given to the ongoing needs of children and families with a disability or 'at risk' as in most instances the support needed by these families is long term and required well beyond the proposed 26 weeks as recommended by the Commission.

The South Australian Government recommends that consideration be given to availability of the 'at risk' Special Early Care and Learning Subsidy for families for a period greater than 26 weeks.

Integrated services

The Commission states that governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

Since 2005, the South Australian Government has been developing a network of Children's Centres for Early Childhood Development and Parenting for children from birth to age eight and their families. Services and programs at these child and family-friendly centres reflect community needs and bring together care, learning, family support, community development and links to health services.



Currently there are 41 Children's Centres operational, four of which are Children and Family Centres established under the National Partnership Agreement on Indigenous Early Childhood Development (NPA IECD). The Children's Centre network is being expanded to 47 together with an expansion of family support and allied health services in existing centres.

The NPA IECD concluded on 30 June 2014, with no further funding committed by the Australian Government for the continued operation of the Children and Family Centres. The centres were designed to address one of the major barriers to accessing early childhood services for Aboriginal families by providing culturally appropriate integrated service delivery that includes service co-location, referral pathways and outreach programs.

The South Australian Government strongly recommends the reinstatement of operational support funding for the Children and Family Centres to support the continued delivery of integrated services to Aboriginal children and families, particularly in our regional and remote areas.

Integrating services provides the potential to realise cost efficiencies through flexibility of staffing, shared administration costs and maximisation of facilities and resources. This will only be realised where there is one approved provider of the integrated service. Currently DECD is working to ensure that integrated services are regarded as one service and not two for the purposes of the National Quality Framework.

Capped viability assistance

The Federal Department of Education advises that there are currently up to 80 services operating in South Australia which are dependent on viability assistance funding. This includes 14 Rural Care Programs operated by DECD.

Currently DECD receives sustainability assistance funding from the Community Support Program that supports the provision of funded long day care places integrated into preschools in rural areas through the DECD rural care program. These long day care places are funded through DECD support (including staffing, facilities and central administration), parent fees and Australian Government funding via child care benefit, child care rebate and sustainability assistance. These long day care places would be significantly impacted if assistance was only provided for three in every seven years and could result in the closure of these services due to lack of viability without this support.

The services that receive viability assistance funding (that are known to DECD) are dependent on the funding on an ongoing basis because of low numbers in rural and remote communities, not because of temporary fluctuations in demand as suggested by the Productivity Commission but due to the size of the communities which is not projected to grow.

Families in rural, regional and remote areas may be disadvantaged due to the lack of access to child care given that private providers are unlikely to provide these services due to viability concerns.



The South Australian Government does not support capped ‘viability assistance’ for a maximum of three out of seven years to assist ECEC providers in rural, regional and remote areas to continue to operate under child-based funding arrangements should demand temporarily fall below that needed to be financially viable.

The South Australian Government supports ongoing viability assistance to support ECEC providers in rural, regional and remote areas to ensure availability and equity of access to child care for families.

5.3 Preschool – supporting universal access

The Productivity Commission recommends that 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 a year (recommendation 12.9).

This recommendation supports the position that has been put by South Australia and all other states and territories that the provision of universal access to 15 hours of preschool is dependent on ongoing funding by the Australian Government.

The principle that funding should be linked to the number of children enrolled and that funding should be inclusive of preschool provided in long day care centres is supported.

The South Australian Government has delivered Universal Access to Early Childhood Education using three key approaches:

- expanding service provision in over 400 existing preschools from 11 to 15 hours per week
- expanded service provision to provide new preschool places in child care centres and non-government schools enabling access to early childhood education for children currently not accessing, or unable to access, government funded preschools
- new service delivery options for vulnerable children, remote and isolated children, children with a disability, medical condition or complex needs, new arrival children and children from non-English speaking background.

The South Australian Government strongly supports the continuation of Australian Government funding to support the provision of universal access to 15 hours of preschool beyond 2015.

The Productivity Commission also recommends that 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 should however broadly align with those in the National Quality Framework.

The South Australian Government is contributing to discussion about this matter through the 2014 Review.



5.4 Outside school hours care – improving accessibility, flexibility and affordability

The Productivity Commission makes several recommendations relating to out of school hours care including:

- a nationally consistent set of staff ratios and qualifications for those caring for school age children in OSHC services (recommendation 7.4)
- removal of the requirement for most children attending an OSHC service to be of school age (recommendation 8.1)
- all schools should be directed to take responsibility for organising the provision of an OSHC service for their students (including preschool students) where demand is sufficiently large for a service to be viable (recommendation 8.2).

Ratios

There are no national educator to child ratios or educator qualification requirements for services that are educating and caring for children over preschool age in the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care (the National Partnership) agreed by COAG in December 2009, and in the Education and Care Services National Law and National Regulations.

Under the Law, each jurisdiction applies their own jurisdiction-specific ratio and qualification requirements for children over preschool age (as set out in the jurisdiction specific provisions in Part 7 of the National Regulations). South Australia's ratio and qualification requirements were based on those published in 'The South Australian Standards for OSHC', introduced in 1998, which were compulsory for services operating on department sites. These standards were readily adopted by providers of OSHC services on other sites, for example Catholic and Independent school sites, as a voluntary code of practice.

As such South Australian OSHC services have been working with a ratio of 1 educator to 15 children, of which the first of every two educators must hold a minimum Diploma level qualification as published under regulation 137(2) in the list of approved qualifications for educators working with children over preschool age for South Australia. There is no requirement for all educators to have a minimum qualification.

The South Australian Government supports maximum flexibility in the scope or type of qualifications approved for OSHC services so that staff are best able to provide a wide and diverse range of developmentally and recreationally appropriate programs for school age children reflective of the My Time, Our Place framework for school age care in Australia. The range of approved qualifications is varied enough to recognise the particular nature of the school age care environment being recreational as distinct from the early childhood education or formal schooling environments and recognises those educators who have completed two years of a four year teaching qualification.



The South Australian Government believes that any decision made on nationally consistent qualifications and ratios for OSHC must be based on sound evidence and recommends that research is undertaken to identify the most appropriate ratios and qualifications that contribute to improved outcomes for children in a recreation and leisure environment. In addition to this a cost impact study should be undertaken.

The South Australian Government recognises there is a link between ratios, qualifications and quality outcomes for children.

The South Australian Government recommends that any decision made on nationally consistent qualifications and ratios for OSHC must be based on sound evidence.

Remove school age

Careful consideration must be given to the identity and scope of OSHC which could effectively have children attending, aged between 3.8 years and 18 years of age. Removing the requirement for most children attending an OSHC service to be of school age in order to receive Child Care Benefit is in conflict with the Education and Early Childhood Services (Registration and Standards) Act 2011. For example, Regulation 104 Fencing, states that the regulation 'does not apply to a centre based service that primarily provides education and care to children over preschool age.' An OSHC service with more than 50 percent of children attending being non-school age would need to consider which parts of the National Law and associated regulations would apply to them.

Direct schools to take responsibility for organising the provision of OSHC

Primary school age children attending a government primary school should be able to access an OSHC service where it is established that such a service is viable, sustainable and can meet the requirements of the Education and Early Childhood Services National Law Act 2010 and the South Australian Education and Early Childhood Services (Registration and Standards) Act 2011 and their subordinate legislative instruments.

The policy for the provision of OSHC services on DECD sites already states that primary school age children attending a government primary school should be able to access an OSHC service where it is established that such a service is viable, sustainable and can meet the requirements of the National Law. This policy recognises the importance and intrinsic value of school age children's recreational and leisure time in the early and middle years and the significant role DECD and schools and governing councils play in meeting the community's need for school age care.

The South Australian Government has maximised access to OSHC services on government school sites by providing for commercial and not-for-profit providers to operate OSHC on DECD sites. School governing councils are supported to engage a third party OSHC provider from the DECD panel of approved providers.



The South Australian Government does not support the recommendation that all schools should be directed to take responsibility for organising the provision of an OSHC service for their students (including preschool students) where demand is sufficiently large for a service to be viable.

The South Australian Government suggests that this recommendation could be amended from ‘directed’ to ‘encouraged’.

5.5 Removal of ECEC assistance to some providers

The Productivity Commission recommends that 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 (recommendation 5.3).

Based on research relating to early intervention and the importance of the home learning environment in determining educational outcomes for children, many jurisdictions have invested in a range of approaches that lie outside of traditional ECEC services.

The South Australian Government through DECD funds Learning Together and Learning Together@Home programs to engage families of children aged birth to three in their child’s learning.

Loss of funding to early intervention programs in South Australia may mean that more families are struggling to engage with their children or to give their children a sound start in learning. This in turn may put pressure on state-funded programs that are able to continue this work and certainly on children as they enter school.

5.6 Quality assurance processes and regulation of ECEC

As detailed previously, the South Australian Government, along with the Australian Government and other states and territories, is participating in the 2014 Review on the NPA NQA. The Productivity Commission has made several recommendations relating to quality assurance and regulation of ECEC that are being progressed through the 2014 Review. South Australia will continue to provide advice on such matters through the review process.

Qualification requirements for educators in centre-based services

The South Australian Government is significantly concerned that the Productivity Commission is recommending that:

- all educators working with children aged birth to 36 months only be required to hold at least a Certificate III
- 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 (recommendation 7.2).



Section 3 of this submission details the importance of a child's early experiences on their brain development and future health, development and wellbeing. In addition, section 4 outlines the impact of qualifications on quality care and education.

Early environments and experiences have an exceptionally strong influence on brain architecture. Stimulating early experiences lay the foundation for later learning. Education reform efforts that invest significant resources in the training, recruitment, and retention of skilled teachers for K-12 will have greater impact if they also include higher standards and more rigorous professional credentials for preschool programs. Research shows that staff knowledge and skills are among the most important determinants of the impact of early childhood programs (<http://developingchild.harvard.edu>).

Educator qualifications and educator-to-child ratios are two prime structural indicators of quality contained in the NQS, underpinned by a large body of evidence that suggests smaller ratios and more qualified staff are key drivers of quality in early childhood education and care. Both qualification and ratio requirements have been phased in to support the sector to meet improved requirements over time.

Various national and state workforce initiatives have supported DECD as an approved provider to upskill its workforce to meet improved educator qualification requirements which are central to the NQF reforms. Additionally, DECD has supported the non-government sector to meet improved qualification requirements under the NQF, including scholarship grants to support teachers to upgrade their qualifications to the four year early childhood teaching degree.

The South Australian Government does not support the following recommendations:

- **that all educators working with children aged birth to 36 months only be required to hold at least a Certificate III**
- **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.**

Working with children checks

Page 310 of the draft report states that 'people working with children in South Australia are only required to undergo a police clearance'.

Children and young people have a right to be safe and protected at all times, including when accessing services in the community. Keeping children safe from harm, abuse and neglect is of paramount importance and a key priority for the government.

The South Australian *Children's Protection Act 1993* requires all organisations providing health, education, welfare, sporting or recreational, religious or spiritual, child care, or residential services wholly or partly for children to develop policies and procedures to create and maintain a safe environment for children and young people.



As part of its obligation to establish and maintain a child safe environment, an organisation must:

- have in place appropriate child safe policies and procedures
- conduct criminal history assessments for people working with children in prescribed positions
- lodge a statement about their child safe environment policies and procedures with the Department for Education and Child Development.

Criminal history assessments can be undertaken through South Australia's authorised screening unit, currently within the Department for Communities and Social Inclusion (DCSI). The DCSI screening unit is authorised to access child protection information and enhanced criminal history information when undertaking assessments.

From 1 January 2014, all new DECD staff and existing DECD staff (except teachers who continue to be screened by the Teachers Registration Board of South Australia) requiring renewed clearances must obtain screening checks through the DCSI screening unit. The screening unit is authorised to access child protection information and enhanced criminal history information when undertaking these assessments.

Pages 310 and 311 of the report also states that adult residents of family day care services (other than the primary carer) must undergo background checks in New South Wales and Queensland but not in any other jurisdiction.

Adult residents of family day care services (other than the educator) must undergo a criminal history clearance in accordance with National Regulation 163. For DECD FDC schemes this is a DCSI clearance that is repeated prior to expiry every three years.

5.7 Ongoing support for evaluation and program assessment

Improving the evidence base

Economic evaluation will become increasingly important to determine the allocation of limited resources to the early childhood sector and between programs within the sector. Economic modelling approaches are another key area of evidence which could be progressed in the future.

A paper prepared by South Australia in September 2013 for the national Early Childhood Development Data Sub-Group, 'Economic Modelling of Early Childhood Interventions: Making better decisions about investments and reforms in child development' found that there is limited evidence available about the Australian context which brings together data on the resource inputs for programs, the rates of uptake and completion of programs for different types of families or children and the causal impacts of the programs estimated from randomised or quasi-randomised trials. More comprehensive data on the attendance of families across the range of programs delivered by numerous government and non-government providers, linked at an individual level to later outcome measures collected by the health, education and community sectors, would enable the costs and benefits of ECEC program investments to be more effectively evaluated.



In South Australia, the Fraser Mustard Centre, an innovative collaboration between the Telethon Institute for Child Health Research and DECD, is driving high quality research to improve children's lives.

The Telethon Institute for Child Health Research has a proven track record of successfully translating research findings into actions that make a real difference to the lives of children everywhere. By working with DECD, key decision makers have first-hand access to the research that will provide valuable insight into the development, education, health and wellbeing of children and young people. This can then be translated into policy decisions based on the highest quality research and evidence.

The Fraser Mustard Centre collaboration aims to:

- improve and promote the health and wellbeing of all children and young people in South Australia through the unique application of multidisciplinary research
- help shift focus from the historical delineation between health and education services to an integrated approach with a focus on child development
- build capacity amongst public sector staff and academic researchers to design, undertake and use research to improve the environments in which children live and the service systems which support families
- attract funding for shared priorities for research that leads to improved developmental, education, health and wellbeing outcomes for children.

Overall level of investment in research

Analysis commissioned by DECD from the Australian Bureau of Statistics shows that there is a low level of investment in research and development for the early childhood and education sectors compared with other industry sectors. The school education sector is of interest for the purposes of this review as the outcomes and benefits of early childhood programs and services often will not be evident until children have started (or completed) schooling.

In the health and medical sector, research is funded annually through a competitive process. For example, the National Health and Medical Research Council's budget was \$689.3 million in 2012-13 and \$771.2 million in 2013-14. There is not a similar mechanism to fund basic and applied research and data analysis for early childhood and later schooling outcomes.

Defining and identifying 'disadvantage' and 'risk'

Whether the uptake of existing interventions by families and the current allocation of resources are proportionate to the prevalence of needs or 'risk' across the population of children is an important policy question. Ensuring that the uptake or 'reach' of services is consistent with known risk factors may be an appropriate policy objective. The design and evaluation of service delivery models is often based on our understanding of 'risk factors' and definitions of 'targeted or disadvantaged groups' chosen. New avenues of data analysis and research may be useful in this regard.



The results of the Australian Early Development Census (AEDC) illustrate that in terms of improving child development and school outcomes at a population level, targeting programs, services or financial assistance based on either relatively simple demographic categories or area-based measures of socioeconomic disadvantage is not an efficient means of directing support to all children with developmental vulnerabilities. This reflects more general limitations of using available 'categories' in administrative data as proxy indicators for developmental and learning needs.





ATTACHMENT 1

THE SOUTH AUSTRALIAN GOVERNMENT THROUGH THE DEPARTMENT FOR EDUCATION AND CHILD DEVELOPMENT AS A PROVIDER OF EARLY CHILDHOOD EDUCATION AND CARE SERVICES

The South Australian Government, through the Department for Education and Child Development (DECD), provides a range of integrated services for the benefit of families, children and young people. The Department aims to support every family so that – right from the start of a child’s life – all young South Australians have the opportunity to become happy, healthy and safe members of our community.

DECD’s core purpose is to provide early childhood development, health and child protection services, as well as public education and care, to South Australians. We have a special focus on ensuring our most vulnerable children and young people at risk of disadvantage are supported to stay engaged as learners. The department believes that it’s better to support families when problems first arise rather than try to intervene later when children start school.

By working together more closely with families, we know we can provide better support so that every child can grow, learn and develop and lead rich, fulfilling and productive lives.

DECD is the largest provider of early childhood education and care services in South Australia. Under the Education and Early Childhood Services National Law, the department is the approved provider of:

- approximately 400 preschool programs catering to approximately 18,700 children each week
- 12 Family Day Care (FDC) schemes with 750 educators providing long day care to approximately 9,000 children each week.

South Australia is the only state government that sponsors Family Day Care and until recently was the single provider of FDC in South Australia.

In addition:

- 2,500 children each week participate in DECD funded occasional care
- 28 preschools offer integrated preschool education and long day care to 2,800 rural and remote children
- 220 DECD schools provide 24,000 Out of School Hours Care places every week, increasing to 60,000 places during school holidays.

Preschool education

South Australia has over 100 years of history of preschool education, generated by community for community with a focus on quality outcomes for children, particularly vulnerable children. Our preschool services are community based and have interacted effectively with other community services and organisations along with children and families. DECD has a history of parent involvement in preschool governance and operations.



Twelve hours of preschool education has been a universal program funded by the South Australian Government which has increased to 15 hours per week in partnership with the Australian Government through the National Partnership on Universal Access to Early Childhood Education. Through our preschools, DECD has provided a range of programs and services for remote, disadvantaged, Aboriginal and Torres Strait Islander children, Culturally and Linguistically Diverse (CALD) children and children with a disability to ensure their access and participation in preschool education.

With our community based model, low cost to families (\$200-400 per year) and our focus on equitable access and participation, South Australia has one of the highest preschool attendance rates in Australia including for our Aboriginal and Torres Strait Islander children.

The South Australian Government recognises the importance of high quality educators in leading and delivering preschool programs and has a long standing history of requiring early childhood teachers to be registered with an approved early childhood qualification.

Since the mid-1980s, South Australia has had an early childhood specific curriculum framework which guided teaching and learning in early childhood settings including Family Day Care. DECD early childhood curriculum officers contributed significantly to the development of the Early Years Learning Framework (EYLF) and the EYLF Educator Guide which built upon our history of inquiry, action research and a focus on children's learning.

DECD led local research to the development of Reflect, Respect, Relate (RRR) as a nationally recommended and distributed resource to support quality improvement and assessment for learning. DECD data shows our educators are continuing to improve and engage with the intent of the resource which has improved outcomes for children.

Our curriculum frameworks and other resources support our focus on continuity of learning and transition to school for all children both prior to school and in the early years of school. DECD structures services and programs to support children and families in their transitions and has developed significant transition resources to support pedagogical connections between preschool and reception teachers.

Our combined focus on children, learning and improvement has led to significant achievements in the Assessment and Rating process within the National Quality Standard (NQS) with a higher proportion of sites achieving 'Exceeding' NQS than nationally and three of the first four services in Australia to be awarded the ACECQA 'Excellent' rating being DECD preschools.

Child Care

In South Australia long day child care services are market-driven and where there are gaps in the availability of child care the South Australian government may establish child care options for families. DECD administers, contributes funding or operates various services to meet community needs. These include Rural Care, Occasional Care, Children's Centres, Family Day Care, Out of School Hours Care and Vacation Care, with some of these approved for Child Care Rebate and Child Care Benefit subsidies from the Australian Government.



Of the 220 DECD schools that host an out of school hours or vacation care service, currently 192 of them are operated by the school governing body. These services are operated on a not for profit basis keeping care for school aged children as affordable as possible at these sites. In mid-2013, DECD introduced a new policy providing the option of school governing bodies to contract a for-profit provider for their OSHC service should the community wish to do so.

DECD's provision of child care services is critical to the needs of children and families, particularly in rural and remote areas where the numbers of children are small and where services may otherwise face sustainability issues. In many of South Australia's smallest communities, DECD is the only provider of child care services and without this provision, communities would have no access to child care.

In providing child care, DECD takes an integrated approach and provides child care from within its preschools in partnership with the community. This provides a range of benefits to children, families and to DECD including:

- a 'one stop shop' where parents can bring their children aged birth to five for child care and preschool education
- seamless transitions for children between child care and preschool
- one staff team of early childhood professionals from both child care and preschool work together to progress children's learning and development
- maximise the use of DECD facilities outside of school terms
- not-for-profit community managed model
- financial and management efficiencies.

South Australian families enjoy fees for services that are amongst the most affordable nationally. The Report on Government Services 2014 found that in 2013 South Australian fees for family day care were the cheapest in the nation and for centre-based long day care were the second lowest nationally after Queensland.