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**Report to**

**Australian Government  
Productivity Commission**

## **Inquiry into Child Care and Early Childhood Learning**

## 1.0 Executive Summary

The Association of Independent Schools of SA (AISSA) welcomes the opportunity to provide comment to the Inquiry into Child Care and Early Childhood Learning. Approximately one third of South Australian Independent schools offer centre based early learning to children and demand for these services is growing.

The AISSA supports the continuation of national directions that focus on both **children's growth and development as well as parental choice to access affordable and quality care.**

The role of the National Quality Framework as a key structure to inform quality is recognised. However, AISSA strongly opposes any attempt by the Australian Government to introduce additional compliance for schools in this area. The existing national legislation is comprehensive and already places a significant administrative burden on schools.

The outcomes of this inquiry must also be cognisant of analogous national reviews of this field, such as *The Report on the National Quality Framework and Regulatory Burden*<sup>1</sup>, as well as the proposed Australian Skills Quality Authority (ASQA) review of the quality of training for the early childhood sector and the review of the National Quality Framework proposed for July 2014.

In summary the AISSA recommends that the outcomes of this inquiry support and sustain Child Care and Early Childhood learning which

- is affordable and accessible to parents wanting to align the early learning development of children with a smooth transition into a school that matches their ethos and values
- does not place an unnecessary burden on schools or duplicate existing processes and does not extend compliance beyond the current legislative framework
- maintains the 7 national quality areas but revises and streamlines associated operational procedures and processes
- provides dedicated funding directly to services or parents, as well as access to nationally funded Child Care and Early Childhood trials
- situates the outcomes of this inquiry within the wider national context of review of this field.

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<sup>1</sup> <http://www.scseec.edu.au/Publications.aspx>

## **2.0 Sector Context**

### **2.1. Early Childhood Services**

Thirty two SA Independent schools (approximately one third of the sector), underpinned by a range of religious affiliations and educational philosophies, currently deliver centre based early learning services to children. These services serve communities across a wide range of socio economic areas.

The provision of early childhood services has been a significant area of growth in the Independent school sector. This growth has been largely driven by parent demand because they increasingly recognise the benefits of transition from early learning to school in the same setting.

The majority of SA Independent school services provide 15 hours of care per week or 600 hours of care per year in programs such as preschools for four year old children, and part-time provision for three year old children.

Fifteen services cater for long day care provision. While the ages of children start from 6 months, the majority of services cater for children aged between 2-4 years. Numbers of children enrolled at long day care services range from 22 at some part-time preschool services to 200 children at the largest long day care service.

### **2.2. Out of School Hours Care (OSHC) Services**

A significant number of SA Independent schools with a primary program also provide an Outside School Hours Care service. The numbers of children supported range from around 15 in the smallest services to 120 in the largest.

### **2.3. Scope of AISSA Response**

The AISSA responds to the Issues Paper as it applies to the SA Independent sector.

Specific comment is therefore made below in response to the following focus areas outlined in the Productivity Commission Issues paper:

- Demand for and expectations of childcare and early learning services
- Government regulation of childcare and early learning
- Government support for childcare and early learning.

### 3.0 Demand for and expectations of childcare and early learning services

#### 3.1. AISSA Response

**Child Care and Early Childhood Learning must be affordable and accessible to parents wanting to align the early learning development of children with a smooth transition into a school that matches their ethos and values.**

The Independent schooling sector strives for quality educational and care outcomes. Schools have demonstrated a strong commitment to excellence in their early childhood practice and have affirmed the importance of the National Quality Standards as the benchmark for practice.

Demand for early childhood services in SA Independent schools is strong and growing. Parents have a demonstrated commitment to enrolling their young children, with almost all services at capacity and several with plans to increase in size. In particular there is a growing demand for long day care provision that is **situated within the family's school of choice, in order to support the needs of parents and children. The strong sense of belonging to an educational community, particularly one which aligns with a family's ethos and values, is a highly motivating factor in parent choice.**

Research demonstrates that accessibility and affordability of child care needs to be aligned with quality in order to promote child development, and in particular to improve the starting point of children from disadvantaged backgrounds (Gambaro, Stewart, & Waldfogel, 2013). These researchers further indicate that in the UK the highest quality care and education *is consistently provided through the schooling sector.*

The significance of children making effective transitions from the early childhood service to the school has been highlighted by Dockett & Perry, (2001). They describe the fundamental importance of effective relationships between the family, community and the school as the basis for children making successful transitions and continuing to flourish both socially and emotionally. When early childhood services are located within the school, these strong relationships are an underpinning feature of a successful transition process.

Increasing the accessibility of high quality early childhood education and care in schools is an important contributor to improving outcomes for young children. Equity of choice and access to quality, affordable education and care in their school of choice should support community expectations, irrespective of the geo-location of schools.

## 4.0 Government regulation of childcare and early learning

### 4.1. AISSA Response

**Whilst recognising the importance of the 7 nationally legislated quality areas of Early Childhood and Care, operational procedures and processes require revision and streamlining. It is critical that the compliance role beyond the current legislative framework is not extended.**

The 7 quality areas of the national framework have been developed based on extensive research (Organisation for Economic Co-operation and Development, 2006) with the quality areas identified mirrored in contemporary UK research, such as Sound Foundations (Mathers, Eisenstadt, Sylva, Soukakou, & Ereky-Stevens, 2013).

Independent schools in SA have demonstrated commitment to the implementation of the National Quality Areas and the quality area of *Leadership and Service Management* is seen as a crucial contributor to high quality educational outcomes.

However, it is timely to revise and streamline national operational processes and procedures, to reduce the burden of bureaucracy for schools and their services. The nature and extent of the regulations that underpin the national quality areas are extensive and burdensome. The rigidity for all service types to satisfy these requirements needs immediate revision so that the National Quality Agenda can be achieved without excessive and prescriptive regulation.

For example, the necessity to implement the My Time Our Place (MTOPI) curriculum framework and the National Quality Standard (NQS) in OSHC services following the same operational parameters as required for Early Childhood provides an unhelpful layer of inflexibility for OSHC educational programs. OSHC programs cater for children with significantly variable attendance rates, and thus a flexible operational approach within the quality area of *Educational Program and Practice* is needed.

The AISSA reiterates its opposition to unnecessary administration for schools or duplication of existing processes and recommends that an audit be undertaken of the current duplication of processes and procedures with a focus placed on whether these processes provide benefit to the key clients of the services – parents and children.

## **5.0 Government support for childcare and early learning**

### **5.1. AISSA Response**

**It is essential that dedicated funding continues to be provided directly to schools or parents, and that all service providers have access to participation in nationally funded trials.**

It is of paramount importance that quality Child Care and Early Childhood learning remains child focused with a continued funding commitment by the Australian Government that directly supports services to staff and delivers high quality outcomes for young children.

The AISSA advocates a model of direct funding to services that is similar to the schooling sector's **model of direct funding**. This model should comprise per capita funding, needs-based funding and capital grants. This will enable all services to better meet community expectation and meet the requirements of national legislation. In addition, it would assist further new services to be established and viable outside of the public sector, and thus provide greater choice of care provision to parents.

Evidence from the National Centre for Social and Economic Modelling, (2012) indicates that with increased maternal labour force participation, the use of child care has increased substantially in recent decades. It also draws attention to the **potential for OSHC services to positively influence children's and families' wellbeing**. OSHC participation has increased by 25 per cent between 2004 and 2009 and more significantly, the number of children attending OSHC is predicted to rise by 40 per cent over the next 20 years (Productivity Commission, 2011).

The AISSA strongly advocates for a direct funding model for services located in school settings. Research from the United Kingdom (Gambaro, Stewart, & Waldfogel) confirms that the highest quality care and education are consistently provided through the schooling sector. The AISSA further recommends that nationally funded systems such as Child Care Benefit and Child Care Rebate, directly support all parents accessing high quality child care and early learning opportunities.

## **REFERENCES**

Dockett, S., & Perry, B. (2001). Starting School: Effective Transitions. *Early Childhood Research and Practice*, Vol 3 No 2.

Gambaro, L., Stewart, K., & Waldfogel, J. (2013). *A question of quality: Do children from disadvantaged backgrounds receive lower quality early years education and care in England?* London: Centre for Analysis of Social Exclusion.

Mathers, S., Eisenstadt, N., Sylva, K., Soukakou, E., & Ereky-Stevens, K. (2013). *Sound Foundations A Review of the Research Evidence on Quality of Early Childhood Education and Care for Children Under Three. Implications for Policy and Practice.* University of Oxford.

National Centre for Social and Economic Modelling. (2012). *Outside School Hours Care: Social gradients and patterns of use.* Canberra: Uniting Care.

Organisation for Economic Co-operation and Development. (2006). *Starting Strong II Early Childhood Education and Care.*

Productivity Commission. (2011). *Early Childhood Development Workforce.* Melbourne: Australian Government.