



## **Submission to the Productivity Commission Childcare and Early Childhood Learning February 2014**

### **Background**

The Montessori sector is unique, diverse and significant in Australian education, particularly in early childhood. There are currently over 500 Montessori schools and ECEC centres throughout Australia with diverse cultures and communities.

Montessori educational programmes in Australia are offered for children from birth to three, three to six, six to twelve and twelve to eighteen years of age. Montessori professionals also work to support the needs of children outside the classroom setting, with a particular emphasis on parent education and community outreach programmes. The Montessori approach to early childhood education and care facilitates holistic child development while providing excellent preparation for transition to primary schooling. Its approach is consistent with what is frequently identified in the literature as being critical to best practice:

- The importance of well-trained practitioners who have the knowledge and ability to develop, implement and evaluate appropriate curricula.
- The key role of pedagogies that facilitate appropriate targeted and personalised learning and development experiences for each child.
- The need for consistency, continuity and stability of environments, particularly for very young children.
- The importance of strong relationships with families, including the vital importance of building capacity to support vulnerable families (Eliot, 2006, p.21)

Montessori education is growing steadily in Australia. Community-based, non-profit associations run the majority of schools with Montessori programmes also streamed into some public schools. In the early childhood sector the majority of centres are privately owned or otherwise integrated into a larger school setting.

Montessori Indigenous learning programmes are also emerging. A recent joint initiative called "Strait Start" has been established between the Torres Strait Islander Regional Education Council, Tagai State College and the Montessori Children's Foundation.

### **The Montessori Australia Foundation (MAF)**

This is the peak national body for Montessori in Australia. It is a non-profit organisation providing support services to Montessori schools and ECEC centres, teachers and parents. MAF maintains communication with all Montessori programmes across Australia and acts as a clearinghouse for Montessori information and communication. MAF also participates on an

international level, particularly with initiatives in Asia (China, India, Thailand), and through the Association Montessori Internationale (recognised by UNESCO and the United Nations).

[www.montessori.org.au](http://www.montessori.org.au)

## **Response to the Inquiry**

MAF welcomes the opportunity to provide a submission to the Productivity Commission.

Our submission covers the following points:

- ✓ Support for implementation of National Quality Framework
- ✓ Affordability of childcare
- ✓ Qualifications
- ✓ Government support by State, Territory and Local Governments
- ✓ Key support measures for childcare services
- ✓ Options for regulatory reform
- ✓ Initiatives of government to address workforce changes

### **Support for development and implementation of the National Quality Framework (NQF)**

MAF has consistently supported the development and implementation of the NQF. Montessori practice is based on the understanding that the early childhood years are the most critical for establishing the foundations of lifelong social, emotional and physical health, confidence and self esteem, love of learning and capacity to learn. The Montessori sector supports the need to “optimise early childhood environments, at home and elsewhere, to maximise the potential for learning and development” (COAG p.15).

Within this context we offer the following comments.

#### **Affordability of childcare**

The introduction of the NQF has resulted in inherent compromises, which have affected childcare operators and families. Measures to improve the quality of childcare have increased the cost of service provision ultimately impacting on the affordability of childcare. It is apparent that a number of children, especially those from lower income families, are being withdrawn from services, thus defeating one of the key objectives of the proposed changes. In addition, where parents are not able to meet rising costs, the withdrawal of children has impacted on the viability and sustainability of services.

MAF supports the view that CCB should be available for all children irrespective of family income levels.

Australian children should be funded equally to receive an entitlement to high quality education and care during their early years. With a focus on the child’s rights, eligibility for funding should not be dependent on the current work, study or training criteria for parents.

MAF also recommends that CCR should be paid directly to centres to ensure that the centre does not have to chase outstanding fees in cases where parents have received the benefit but withdrawn from the service without full payment for fees owed.

An issue of major concern to the Montessori sector is the current exclusion of families choosing Montessori early childhood education and care for their children in services that operate for less than 48 weeks per year from accessing financial support through either CCB or CCR. This issue also impacts on a number of independent schools with early learning centres providing early childhood education and care.

Many families make considerable sacrifices in relation to, for example, their work commitments, to ensure that their children are not in long day care 48 weeks of the year, but rather are able to spend significantly more time with their families. This often involves negotiating flexible working arrangements, some of which are achieved as a consequence of sacrificing income. In many cases, this involves parents taking recreation leave at different times, or ensuring other family members are available to take care of children while centres are closed. As a result of the current CCB regulations, these families receive no financial assistance, and services that are ineligible for CCB require families to pay full fees for service. This precludes many families from having a choice of service due to financial circumstances.

‘Registered services’ are also unable to access the Inclusion Support Subsidy for children with additional needs as this is only linked to ‘Approved Care’ services. This discriminates against families accessing the environment of their choice to best cater to the needs of their child. Given the increasing demand for childcare, and the government’s commitment to quality provision for all Australian children, there is an urgent need to redress this situation if the supply of early childhood education and care places, the right of parents to exercise choice, and provision and standards of service are to be supported.

Similarly, the distinction currently made between ‘registered care’ and ‘approved care’ in relation to eligibility for CCB and CCR should be reviewed. In some areas, being unable to claim Commonwealth benefits for which they would be eligible if their child was instead attending a childcare facility significantly financially disadvantages families whose children attend pre-school. This appears anomalous in the extreme given the strong support of the NQF to the principle that learning in the early childhood years is the foundation of lifelong learning. Moreover, since the Montessori sector is currently developing partnerships to provide quality early childhood education and care services to some of the most disadvantaged communities in the country, for example remote Indigenous communities, the current preclusion of many Montessori services from accessing CCB/CCR constitutes a significant obstacle to providing services to communities which would otherwise have little (and in some cases no) access to quality provision.

MAF proposes that consideration be given for the Universal Access funding allocation (which is currently distributed in an inconsistent manner by individual jurisdictions) to be distributed in a more equitable and consistent way to support all children, by distributing the funding to ECEC centres to assist in the cost of employing suitably qualified staff to meet the NQF requirements.

## Qualifications

The Montessori Sector supports the view that all children are entitled to have access to qualified teachers, regardless of their age or the size of the service. However, we also are cognisant of the demands this will make on services in relation to the upgrading of qualifications and also in terms of higher costs in staff wages. In the context of a Montessori setting, the requirement for a University qualified ECEC teacher adds little value to the Montessori programme unless that person also has additional training in the Montessori pedagogy. This requirement appears to our Sector to add no value to our services other than achieving regulatory compliance.

It is also untenable for Montessori services with less than 25 children to access “a proportion of an ECEC teacher for educational leadership”. In a Montessori service, this is an unworkable situation, defeating the purpose of the approach, and the choice parents have made for their children. Montessori programs are dependent on the creation of learning environments specific to the developmental needs of different age groupings, and on the unique relationship between teachers and children. The educational approach cannot be extracted in part to be suitably “led” by an ECEC teacher with little or no knowledge of the Montessori pedagogy.

Given the specialist training required to work in Montessori services, we propose that the regulations are amended to allow Montessori staff with an appropriate university degree, or a two year Diploma in Children’s Services plus a one year Diploma in Montessori, to be considered appropriately qualified to deliver early childhood education and care programmes in a Montessori setting thus exempting the service from the requirement for a further University trained ECEC teacher.

## Government support by State, Territory and local governments

It is the experience of some Montessori childcare operators who have considered further expansion of services that there are several obstacles which inhibit this process. Local government planning regulations often require significant off road parking and zoning rules often prohibit the building of childcare centres in residential areas therefore forcing them to be located in commercial zones and often along busy roads.

Currently there also appears to be inconsistency in whether local councils charge land tax and council rates dependent on the status of ownership of the childcare centre. Privately operated childcare centres must pay the rates whereas community centres are not required to comply. Similarly this is the case with payroll tax which adds significantly to the cost of service provision of childcare employers. Not-for-profit centres are exempt from payroll tax whereas privately operated centres are not.

Consideration of the waiving of additional taxes for privately operated childcare centres would impact on the overall cost of service and affordability for families.

## Key support measures for childcare services

The Montessori sector strongly supports inclusivity particularly for children with additional needs. However we believe that the support services offered to centres to improve their capacity to include children with a disability or high needs support is totally inadequate. Currently only a small amount of funding is available from the Inclusive Support Subsidy (ISS). This amount falls short of at least a third of the cost per hour to employ an additional person in the classroom leaving the centre to subsidise the remaining amount. The ISS support is also limited to five hours per day leaving the child either without longer hours of care, the centre without additional support for the child or the centre subsidizing the full cost of a carer for any additional time the child is at the centre.

Centres that are “registered” and not “approved” for CCB cannot access ISS services at all which greatly restricts the ability for those services to include children with additional needs.

MAF supports a review of the support services offered to childcare services. Accessibility of childcare services and respite for families of children with additional needs is currently limited through inadequate funding.

## Options for regulatory reform

MAF has consistently supported the NQF and the intent to raise the quality of service provision for young children. However there are some apparent complexities that have become evident since the introduction of the NQF that could be streamlined to make it easier for centres to comply and to reduce government cost of administration.

MAF supports a review of the following:

### Supervisor certificate

This appears to have little to do with improving the outcomes for children and the process of seeking approval adds an administrative burden and an unnecessary cost for services

### Educator breaks

The NQF requires that if a qualified educator has non-contact time, for example for programme planning, then that person must be replaced with a similarly qualified person. This is often difficult to achieve, especially in small services with limited staff. MAF supports the replacement of a qualified person with a Certificate 111 educator for short periods of non-contact time to make it easier for centre operators to be compliant.

### Programme planning for every child

There is an expectation in the National Quality Standards (NQS) to undertake individual planning for every child in the service. Montessori supports the careful observation and individual progression of every child through the Montessori curriculum however the NQS requirement is placing undue stress on educators to record the planning, outcomes and reflections for every child. This is particularly so in services where children may attend part time

and the overall number of children attending throughout the week is high. Educators are becoming stressed and finding it difficult to comply with the requirement for this level of record keeping. Extensive programme planning and record keeping often detracts from quality time spent with the children. It also detracts from careful observation and spontaneity of learning opportunities.

### Subjective aspects of the NQS

Two areas that seem to have greatly impacted centres and possibly required the most change to previous practice are the requirement for “Community Involvement” and “Embedding Sustainable Practice”. ACECQA reports that many centres fail to meet the NQS in these areas. Whilst Montessori practice supports the intent of these requirements many centre operators report their concern at the ambiguity of words such as “embedded”. It appears that the level to which a centre is required to involve the children in the community or sustainable practice is subjective and not consistently viewed by assessors across Australia.

The size, location, and circumstances of a service may determine the ability of the centre to actively incorporate the high level of expectation to comply in these areas.

### Waivers

The current application process, the cost and the processing time involved make it extremely challenging for centres that require exemption for unusual or immediate circumstances.

### Application for ‘Excellence’

The cost burden on centres to apply for excellence may be prohibitive for some centres. The process requires an ability to submit an extensive application and relies on the ability of the centre to write a convincing argument for excellence. The ability to submit such a level of detail may be problematic for some centres. The current timeframe of waiting up to 60 days for the result of an application for excellence to be considered by ACECQA is also discouraging.

### Initiatives of Government to address workforce shortages

Many Montessori teachers have both four-year university qualifications and Montessori training for one or both of the early childhood developmental phases (birth to three, three to six). However, a percentage of educators hold only Montessori diplomas, in addition to differing lengths of experience. With the current shortage of workforce and the requirement that Montessori educators have specific knowledge and training in Montessori pedagogy, we suggest that:

- RPL arrangements be developed which will allow experienced and highly competent staff members, to gain some credit at least towards degree qualifications.
- RPL arrangements be developed which will allow for recognition of teachers with both Montessori early childhood qualifications and education degrees in areas other than early childhood to be considered appropriately qualified to work as teachers in the early childhood field.

- ✓ Montessori qualifications be recognised as at least constituting partial fulfilment of a degree course in early childhood education or TAFE diploma or certificate courses as appropriate.
- ✓ Montessori training courses be given recognition in the ACECQA listing of approved qualifications
- ✓ Overseas Montessori trained educators be provided with easier pathways for recognition of qualifications through RPL and work experience.

## Conclusion

In summary, MAF makes the following recommendations to the Productivity Commission.

- ✓ Review the current CCR and CCB policies to ensure income equity for all families, irrespective of family income levels.
- ✓ Review the Universal Access funding distribution arrangements to ensure equity.
- ✓ Amend the Regulations to exempt Montessori services from the requirement to employ or access an ECEC teacher and allow a suitably qualified Montessori teacher to fulfil this role.
- ✓ Consistently apply land tax, council rates and payroll tax to both community and privately owned child care services to reduce overall costs to service provision.
- ✓ Review support services offered to childcare services to ensure equity and adequate funding across the sector.
- ✓ Review the NQF with particular regard to the supervisor certificate, educator breaks; programme planning for every child, subjective aspects, waivers and application for excellence.
- ✓ Put in place RPL arrangements for suitably qualified Montessori educators to address the current workforce shortages.

MAF has consistently recommended quality provision of early childhood education and care in Australia. We support any initiatives and changes to current legislation and practice that will provide support consistency and equity across the diverse range of providers, give support to all families who are in need of high quality early childhood education and care, ensure affordability and lessen the regulatory burden on ECEC services.

Montessori Australia Foundation  
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