



7 October 2016

Commissioners Jonathan Coppel and Julie Abramson  
Productivity Commission  
National Education Evidence Base  
Locked Bag 2, Collins Street East PO  
Melbourne VIC 8003  
By email: [education.evidence@pc.gov.au](mailto:education.evidence@pc.gov.au)

Dear Commissioners

Thank you for the opportunity to comment on the Productivity Commission's Draft Report on the National Education Evidence Base, September 2016.

The Australian Children's Education and Care Quality Authority (ACECQA) is the independent national authority established under the Education and Care Services National Law to guide the implementation of the National Quality Framework (NQF) for the early childhood education and care (ECEC) sector. ACECQA welcomes the Draft Report, which outlines the case for a robust national evidence base to support decision makers at all levels of the education system to make informed choices about programs, policies and practices. ACECQA welcomes the report's draft recommendations and findings, in particular:

- Broadening the scope of the national education evidence base to include evidence for children aged birth to four. Early childhood education and care is an integral part of the Australian education system and lays the foundations for children's later learning and development. It is also an area of significant investment by government.
- Recommending new cohorts of children for longitudinal studies, to provide rich data on the experiences of Australian children since the introduction of the NQF in 2012.
- Highlighting widespread support from stakeholders for data linkage and the potential this offers for policy development and analysis, and program evaluation.

ACECQA has responded to a selection of the draft report's recommendations and information requests (**Attachment A**).

If you would like to discuss our responses, or would like further information, please contact Michael Petrie, General Manager, Strategy, Communications and Consistency, on 02 8240 4230.

Yours sincerely

Karen Curtis  
**Chief Executive Officer**

### Information Request 3.1

*The Commission seeks comment on whether the Australian Early Development Census could be used to monitor progress against Australia's early learning objectives.*

As noted in ACECQA's initial submission to the Inquiry, the AEDC provides important nationwide data on a broad set of outcomes at a child level, including children's physical health and wellbeing, social competence, emotional maturity, communication skills and general knowledge. These areas are closely linked to the predictors of adult health, education and social outcomes.

In 2015, the AEDC collected data on 302,003 children in Australia, representing 96.7 per cent of children in their first year of full-time school.<sup>1</sup> Teachers complete the instrument based on their knowledge and observations of the children in their class<sup>2</sup> and can record some information about whether the child attended preschool or kindergarten before commencing full-time school (if they are aware of this information).

As noted in the Draft Report, and by ACECQA and other stakeholders, there is scope to strengthen Australia's education evidence base in the area of early childhood education and care (ECEC) with respect to:

- the contributions of ECEC quality components to development outcomes of children (such as the physical environment, programs and practices, staff qualifications and staff to child ratios)
- how ECEC attendance affects the outcomes of children in their early years of schooling and longer term (for example, the number of hours attended, the age at which children commenced attendance)
- how ECEC programs benefit different groups of children and families, especially those experiencing vulnerability and disadvantage.

There is an opportunity to link results of the AEDC to ACECQA's National Quality Framework (NQF) data on ECEC service quality, noting the limitations of the AEDC data capture, to see whether children who attend higher quality education and care services have more seamless transitions to school than other children, and whether they have better educational and other development outcomes than children who attend lower quality ECEC services.

Linking these data sets could also help compare outcomes for children participating in varying levels of formal education and care services with those engaged in other forms of care, such as informal parental care, grandparent care, occasional care, playgroups and mobile services. These comparisons could inform policy and program development, and government funding decisions.

<sup>1</sup> <https://www.aedc.gov.au/early-childhood/findings-from-the-aedc>

<sup>2</sup> <https://www.aedc.gov.au/early-childhood/early-childhood-educator-faqs>

### Draft Recommendation 3.2

The Australian Government should request and sufficiently fund the agencies that conduct the *Longitudinal Study of Australian Children* and the *Longitudinal Study of Indigenous Children* to establish new cohorts of children at regular intervals.

ACECQA supports Recommendation 3.2. As noted in ACECQA's initial submission, data from new cohorts of children will provide valuable insights into the current early childhood education policy context and the NQF's contribution to positive outcomes for children and communities.

The current sample sizes of the existing studies do not enable robust analysis of sub-populations that are now relevant to policy, such as families who experience persistent disadvantage.

ACECQA supports larger sample size and oversampling sub-populations of interest in future cohorts to address this. As noted in our initial submission, birth cohort studies established since 2010 have also included a number of additional features including early-life measurement and have collected prenatal and postnatal information that has been shown to predict future life outcomes.<sup>3</sup> ACECQA supports the inclusion of these additional measures in future cohorts.

### Information Request 4.1

*The Commission seeks further information on:*

- *the costs and benefits of moving toward a national student identifier (compared to jurisdictional systems)*
- *the feasibility of using the unique student identifier system used in the vocational education and training sector to deliver more comprehensive student coverage*
- *the costs and benefits of children in the early childhood education and care sector being covered by the same identifier as school students.*

ACECQA supports the national expansion of the Unique Student Identifier to students in primary and secondary school, and in early childhood education and care to support increased data linkages in the education evidence base.

There would be several benefits of children in the early childhood education and care sector being covered by the same identifier as school students. As noted in ACECQA's initial submission, this would facilitate sharing of information across government agencies and would reduce the administrative burden on families and education and care services.

Subject to appropriate data protection assurances, linkage of ACECQA's NQF data on ECEC service quality with data held by other agencies about children and families would provide valuable information on the impact of quality on child outcomes, and facilitate evidence-driven policy.

<sup>3</sup> Western, M., Haynes, M., Baffour, B., Perales, P. (2014) The case for a new Australian birth cohort study, Report commissioned by the Australian Government Department of Social Services, Institute for Social Science Research, The University of Queensland, Brisbane. <https://www.isr.uq.edu.au/filething/get/36404/FINAL%20REPORT-Approved%20for%20publication-ISSR000894.pdf>

Having a single national student identifier that covered the early childhood education and care and school sectors would enable researchers to track a (de-identified) individual's trajectory through the education system and look at the impact of early childhood education and care and other factors on later outcomes. Having a single national student identifier need not also entail individual child assessment in the years prior to school, but it would create the opportunity to trace individual children from the point at which they enter the regulated and government subsidised education and care system, through their entire education journey.

ACECQA proposes that consideration of options to implement this proposal should include building on existing unique identifiers that already apply to most children and families. This option would have the benefit of leveraging off an experienced identifier issuing agency, and could streamline administrative overheads for both families, and service providers.

### Information Request 8.1

*The Commission seeks further information about the strengths and weaknesses of its proposed institutional and governance arrangements.*

The Draft Report suggests:

- a new national Education Agreement which defines the framework for evaluating the policies, programs and teaching practices that work best and
- assigning an institution to be responsible and accountable for implementing the framework.

In assessing the need for a new Education Agreement and its content, ACECQA encourages careful consideration of the functions and roles of existing national agreements and Education Council bodies to avoid duplication of effort and resources, and to ensure alignment and effective cooperation among stakeholders.

In principle, ACECQA supports the concept of a national institution to oversee the proposed framework, including funding and commissioning research, ensuring standards of evidence are maintained, and translating and disseminating findings. ACECQA suggests that in the interests of efficiency and minimising establishment costs, an existing institution be considered for this role, rather than creating a new stand-alone organisation.

ACECQA also supports careful consideration of governance and accountability relationships between any new function, and other Education Council structures and governance mechanisms. ACECQA's experience is that the right governance relationships will be those that strike an effective balance between securing the interests of all government partners, while not limiting adaptation and responsiveness.