

Dear Commissioners,

Your task to investigate the options for creating simpler, more affordable, accessible, flexible and integrated services for families of young children is certainly an essential one and of significant import for our contemporary Australian society. However, the *Child Care and Early Learning, Draft Report (2014)* contains some concerning recommendations that appear to ignore research about young children's learning and development, especially in relation to under three's; and, that do not seem to better facilitate accessibility to early childhood education and care (ecec) services, particularly for vulnerable families.

The points that follow will outline my concerns with some of the recommendations contained in the *Child Care and Early Learning, Draft Report (2014)*. Co-incidentally these concerns have also been expressed by other individuals and groups representing children, families, educators, community members and providers of ecec services in the many submissions and comments provided to the Productivity Commission; as well as, verbally to you both at the recent hearings held around Australia. I attended one of these hearings as an observer on 18<sup>th</sup> August, 2014 in Melbourne.

#### ***Importance of putting children's rights and outcomes at the centre of any system reform***

- It seemed unusual that the *Child Care and Early Learning, Draft Report (2014)* examined ecec reforms predominately from the perspective of the adult – we need to also look at ecec from the child's perspective, not just the adult's. Taking into account the viewpoint of the child helps us consider whether their rights (as ratified in *The United Nations Convention on the Rights of the Child, 1990*) are respected and their learning, development and well being outcomes are optimised as ecec program participants.

#### ***Government investment in ecec to ensure ALL children are thriving and learning***

- We need to think about the long term gains to Australia's current and future productivity as a nation when we have well educated, well adjusted healthy children who then become our next generation of 'workers' and contributors to society. Creating the 'best' learning environment for children should therefore be paramount – ecec services that support quality outcomes for children and their families requires adequate and appropriate funding. In particular, equality of access to high quality ecec programs for **all** children and families needs to be better addressed. Recent evidence from the *E4Kids study* (pers. comm., C. Tayler, 2014) is finding that often children and families with the highest needs are often only able to access programs of lesser quality that further entrenches their disadvantages and challenges.

- Included within this consideration is the continuation of universal funding for 15 hours/week of ecec in the year before starting school; and, better funding, coordination and delivery of intervention support to children with additional needs. Examples of current challenges faced in the latter category include: having no support, such as, an additional educator to work with an 'at risk' child in a service whilst 'waiting' for a diagnosis, and/or relevant funding; different criteria and access to programs funded federally and/or, by state/territory governments. Further investment is therefore needed to ensure these programs reach and respond to the varied needs of children and their families as flexibly as possible and in a timely manner.

#### ***The importance of qualifications held by the educators working with children aged birth to three years as shown by research and practice evidence***

- Your recommendation that the qualification level of educators working with children aged birth to three years should only be certificate three is most concerning. A 'mix' of educators is needed when working with young children i.e. certificate three, diploma and degree level. Through working as a team and sharing insights and perspectives educators are then able to collaboratively support the learning, development and well being needs of the children they work with. Children need educators with an in-depth knowledge of child learning and development, educational theory and pedagogy so children's learning needs are recognised and appropriately catered for. Research on brain development and evidence from longitudinal studies such as *The Abecedarian*

*Project* (Sparling, 2011) consistently highlight that it is not enough to keep children safe and healthy - we also need 'quality' interactions between adults and children to build children's skills, understandings and competencies to enhance their learning, development and well being. Training to the diploma (two years) and degree (four years) level prepares educators to develop skills and understandings that will enable them to more successfully do this. Training in only a certificate three (varies highly from six weeks to three months duration) does not provide educators with this level of competency. Therefore the 'quality' of the education and care provided to under three's would be seriously compromised if all their educators are trained only to this minimum level. Many parents have shown strong objection to this particular recommendation as well – for example, *The Parenthood* organisation has gathered substantial evidence that shows parents would be willing to pay for highly qualified staff and higher educator to child ratios in their child's ecec service.

- Also, to further support the quality of education and care for all children participating in ecec programs the current reforms to educator to child ratios need to be maintained, especially as this continues to be transitioned across jurisdictions into 2015-16. Your recommendation to 'average out' educator to child ratios in a service over the week raises genuine concerns for the safety, well being and learning needs of children. Of particular concern is that this 'flexibility' may encourage some providers to exploit situations where, for whatever reason, they are not able to adequately staff their services. This recommendation would not only have negative impacts on children and families but would also inhibit any positive moves towards attracting and retaining staff in ecec. I do appreciate that the report did not seek to address this particular complex industrial issue but it is a consideration that is critical to lifting and maintaining the quality of ecec services for Australian children and their families.

#### ***Retain and keep on track with the National Quality Framework (NQF)***

-Building service 'quality' takes time! The national roll out of the curriculum frameworks, Law, Regulations and National Quality Standard (NQS), including the assessment and rating process, has needed much cooperation, time and patience for it to be put into place over the last few years. We are beginning to see the benefits of the reforms for children's learning outcomes. For example, almost 62 per cent of assessed children's education and care services are Meeting or Exceeding the NQS, according to the latest *National Quality Framework (NQF) Report* as released by ACECQA in August, 2014.

- The NQS in particular, is an excellent accountability tool that is helping lift the quality of programs offered to children leading to enhanced learning outcomes for children, with the side benefit of educators feeling more valued and motivated to do their work to the best of their capacity. Quality education and care programs for children are very complex and the NQS clearly articulates the essential components of this (as substantiated by a great deal of research and best practice evidence). Any 'watering down' of the NQS is to be avoided at all costs – the current set of quality areas, standards and elements cannot be further streamlined without serious negative consequences for children and families. The 'red tape burden' cited in the *Child Care and Early Learning, Draft Report (2014)* as a reason to recommend the NQS be made more concise has been overstated, especially now we are well accustomed to the processes and all transitional arrangements near completion in most jurisdictions. It was therefore very encouraging to hear Shane Lucas, CEO of the Early Learning Association Australia, which represents the majority of Victorian preschool program providers, also tell you both at the Melbourne hearings that this 'red tape burden' has been much overstated.

#### ***The proposal to remove preschool/kindergarten services from the NQF***

- It would be a most retrograde step if preschool programs were removed from the NQF, especially in light of steadily increasing improvements to program quality since the implementation of the NQF (ACECQA, 2014).

- Of particular concern with this recommendation is that it would lead to fragmentation between services educating and caring for children under and over three years of age as well as considerable variability in learning outcomes for children. Also, a lack of unity and clarity across communities and jurisdictions would make it confusing and frustrating for families as well as for educators and would eventually lead to negative impacts on children's learning, well being and development. Another concern is whether schools are equipped financially and with appropriate staffing and other resources to competently manage the quality and viability of an ecec service. With so many government/public schools 'stretched' to provide basic school programs how would their global budget allocation also adequately accommodate additional responsibility for an ecec program as well? There is a genuine fear that all Federal funding for preschool programs would be removed with only State/Territory funding remaining and at an inadequate level to support quality outcomes for

preschoolers. At the hearing in Melbourne Commissioner Craik mentioned this recommendation was made in response to the Tasmanian and West Australian governments citing that governance for their preschools is subject to both Federal and State legislation – I suggest these jurisdictions look to the examples of South Australia and ACT who have found ways to incorporate the NQF legislation within ecec services for preschool aged children and with no compromises to the quality of children’s learning outcomes.

- Another associated concern with this recommendation is the proposal for outside school hours care programs located on school premises who cater for school aged children, to also provide for preschool aged children requiring education and care in addition to their allocated 15 hours of an ecec program. I cannot see how high quality learning outcomes for children would be ensured in this context unless appropriate staffing qualifications and ratios, buildings, facilities and resources are first put in place in these settings. For example, some school communities, such as an independent school with an early learning centre on site, are able to operate both types of programs but in separate rooms/areas. The complicated nature and expense of modifying school infrastructure could make this cost prohibitive for many school communities. Many ecec services have already heavily invested in additional staffing, resources, buildings and facilities to be able to provide this type of ‘wrap around’ care and education program with success. This recommendation requires further work and thought.

***Removing charity tax concessions from not-for-profit providers to redress a perceived ‘competitive advantage’***

- Many not-for-profit providers of services operating in disadvantaged communities ‘targeting’ children and families with very high and complex needs already currently operate on very stretched budgets. These additional expenses would erode their ability to continue to provide vital programs costed on extremely tight budgets and families would certainly not be able to contribute further to make up for any ‘shortfalls’ in costings.

- Your proposal to tighten the work/study activity test for eligibility to early learning benefits needs to be reconsidered. The criteria needs to be broadened so that vulnerable Australian families as well as those with changing and complex needs continue to be able to access relevant ecec and associated support services. One suggestion to address this concern would be to include adding health care cards to the eligibility criteria.

We are at a crucial point in early childhood education and care in Australia – we have implemented many positive reforms but need to continue reflecting on the gains made and to carefully plan any improvements by dedicating further time and sufficient funding to guarantee ongoing and continued success for the best possible outcomes for our children. They are our nation’s future success and prosperity! Please join me in advocating for investment for a strong future for our children.

Yours sincerely,

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