



Queensland University of Technology

School of Early Childhood  
Faculty of Education  
Queensland University of Technology  
Victoria Park Road  
Kelvin Grove Q 4059 Australia

The Commissioner  
Productivity Commission  
Department of Education  
Australian Government

3 September 2014

Dear Commissioner

I write on behalf of the School of Early Childhood, Queensland University of Technology, to thank you for the opportunity to make a written submission in relation to the Draft Report of the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning*. Our submission includes early childhood academics from the School of Early Childhood and associated staff from the Faculty of Health / School of Psychology at QUT. Contributors include:

Professor Donna Berthelsen  
Professor Susan Danby  
Associate Professor Julie Davis  
Associate Professor Beryl Exley  
Professor Ann Farrell  
Professor Joanne Lunn  
Adjunct Associate Professor Anne Petriwskyj  
Professor Karen Thorpe  
Professor Sue Walker  
Associate Professor Kerryann Walsh

Adele Amorsen  
Mia Christensen  
Dr Julie Dillon-Wallace  
Dr Megan Gibson  
Dr Susan Irvine  
Dr Amanda McFadden  
Dr Melinda Miller  
Dr Lyndal O'Gorman  
Allison Ohlsen  
Suzy Tamone  
Dr Maryanne Theobald  
Dr Sonia White  
Dr Kate Williams  
Lyn Zollo

Best wishes in your deliberations.

Professor Ann Farrell  
Head, School of Early Childhood

**School of Early Childhood  
Faculty of Education  
Queensland University of Technology (QUT)**

**Response to Draft Report of the Productivity Commission's  
*Inquiry into Childcare and Early Childhood Learning***

The School of Early Childhood at Queensland University of Technology is pleased to submit a response to the Draft Report of the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning* (2014). Our written response follows our original submission to the Commission on 3 February 2014. It is based on professional conversations on the Draft Report conducted with staff at QUT and intensive discussions within our collegial networks in Early Childhood Education and Care (ECEC). It also follows our representation at the public hearing of the Productivity Commission on 26 August 2014 (attended by Professor Ann Farrell, Dr Sue Irvine, Dr Megan Gibson and Dr Amanda McFadden).

We strongly acknowledge the significant and lasting influence of the early years of life on children's health, development, learning and wellbeing. While we recognise that families have the greatest influence, we believe that supporting families to give children the best start in life is a shared responsibility, for government, business and industry, the education sector, and the broader community.

Our view is informed by the United Nations Convention on the Rights of the Child (1989), and by extensive research evidence, acknowledged within your report, that investments in early childhood education provide multiple educational, social and economic benefits to children, families and the broader community. Within this context, we view access to high quality education and care as the right of Australian children and their families, the cornerstone of an effective education system and a fundamental workforce strategy supporting the nation's overall prosperity, now and into the future.

Our response is presented here as commendations and recommendations, pertaining to the Draft Report. Commendations are those aspects of the Draft Report for which we applaud the Commission, while recommendations are those aspects that we put forward for the Commission's further consideration.

### **Commendations**

1. We view access to high quality early childhood education and care (ECEC) as a public good, and recognise the critical role that government plays in Australian ECEC. We commend Australian, State and Territory governments' continuing commitment to and leadership in strengthening access to inclusive, quality ECEC services, and welcome the opportunity to share views on a range of related issues. The focus of our response is on strengthening access to *formal* ECEC services prior to school entry (e.g., centre-based long day care, preschool/kindergarten, family day care and outside school hours care).
2. We commend the commitment to building a strong platform of universal ECEC services, with additional funding for services to provide enhanced programs and

support for children and families with additional needs. This approach must be non-stigmatising, support social inclusion, optimise children's learning and development and support parental workforce participation.

3. We commend the respect for the strong evidence that investment in quality ECEC yields significant and lasting educational, social and economic benefits for children, their families and the broader society. The evidence shows the significant and lasting impact of quality ECEC on children's health, wellbeing, life chances and lifelong learning, and the capacity for ECEC services to improve outcomes for children and families from low socio-economic communities and Indigenous communities (Bowes & Grace, 2014).
4. The realisation of individual and collective returns on investment in ECEC is dependent upon ensuring the quality of these services (Camilli et al., 2010; Cunha et al., 2006; Heckman, 2011; Mustard, 2008). We commend the Commission's support of the National Quality Framework (NQF). We recognise the development of the NQF as a significant historical milestone in Australian ECEC, and an effective and evidence-based approach to enhancing quality. The NQF has a number of strengths:
  - key quality determinants
  - performance-based standards that can be met in different ways
  - continuous quality improvement.

So too, the NQF reflects contemporary evidence regarding effective regulation and quality assurance in ECEC (Ishimine, Tayler & Bennett, 2010; OECD, 2006; Tayler et al., 2013).

Our collective engagement with a range of stakeholders continues to demonstrate the positive impact of the NQF on the quality of educational programs, partnerships with families and communities and educational leadership within services (key indicators of quality). In a recent project with Goodstart Early Learning, we found that the NQF provided a practical platform for this organisation to realise its mission to provide high-quality accessible and affordable services (Sumsion, Harrison & Irvine, 2013).

We see the key quality areas and related expectations, as appropriate and achievable within the current Australian ECEC context, and endorse the reasonable staging of increased quality expectations as currently set out. We strongly oppose any reduction in quality expectations, including suggested changes to qualification requirements for educators working with our youngest citizens (See Recommendation 3). We do not accept that any elements in the NQS add unnecessarily to a cumulative compliance burden on services.

5. We commend continued support for universal access to preschool (i.e., kindergarten in Queensland) and view this as an integral component of a comprehensive and integrated education and care service system.
6. We commend the Productivity Commission's decision to go beyond the current funding envelope and to recommend what we perceive to be a modest increase in government funding for the ECEC service system at this time. By international comparisons, our national investment in ECEC remains relatively low. There is a need for continued and appropriate public investment to build and sustain the service

system Australia needs to deliver the identified shared benefits for our society (Cloney et al., 2013; Irvine & Farrell, 2013; Tayler et al., 2013).

7. We commend efforts to address the complexity of current ECEC funding arrangements, and offer 'in principle' support for a simplified child-based subsidy that provides increased financial support to families who need it most. It is our view, however, that further consideration needs to be given to what constitutes 'reasonable cost'. Clearly, it is critical that the funding model is set at an appropriate level and is reviewed regularly. We note the recent work of colleagues Brennan and Adamson (2014) and their costing at \$10 per day; and we are not convinced that the proposed \$7 per hour will cover the cost of quality service provision. Further, we believe that any costing model needs to take into account the impact of geographic location on the cost of quality service provision and be subject to regular review.

While we support some means-testing for funding, we also believe that funding must be underpinned by a government commitment to universal access, recognising ECEC services as a public good in the same context as schools.

8. We recognise the vital role that quality school age care services play in promoting positive child outcomes and supporting parental workforce participation. We commend the focus on ensuring availability of high quality Outside School Hours Care (OSHC) services on school sites, and the proposed introduction of national standards relating to qualifications and ratios for educators in OSHC.

## **Recommendations**

1. As is a leader in early childhood teacher education in Australia, we strongly recommend that educator quality be recognised as critical to ensuring quality in early childhood education and care (ECEC) and positive outcomes for children, families and the community. To this end, we strive for excellence in the preparation of early childhood professionals. While it is difficult to draw a direct line between qualifications and child outcomes, there is an accumulating body of evidence that indicates that specialised early childhood qualifications support educators to do their job better. For example: to build positive relationships with children and families (Wong, Press, Sumsion & Hard, 2012); to design relevant and responsive educational programs; and to select and apply effective teaching strategies (e.g., instructional support) (Sabol et al., 2013; Sylva et al., 2004; Tayler et al., 2013).
2. We recommend there be no change to NQF quality requirements relating to the qualifications of educators. We believe the current NQF mix of qualification requirements is appropriate and achievable and provides the foundation upon which all other quality areas rest. We endorse the introduction of increased qualification requirements for all roles within ECEC, including a minimum qualification requirement (Certificate III) for all educators, together with enhanced numbers of Diploma-qualified educators and Early Childhood Teachers in ECEC based on the full complement of

children in the service. We oppose any move to reduce qualification requirements for educators working with children birth to three years. There is a significant body of research that recognises this as a critical period for learning and development (Lally, 2010; Mustard, 2002; Shonkoff & Phillips, 2000), and attests to the positive impact of quality services in enhancing parenting skills and engagement in early learning (McCain & Mustard, 1999, 2002; Rolfe & Armstrong, 2010).

3. We recommend a focus on and pursuit of a qualified, skilled and sustainable ECEC workforce. This begins with the provision of quality pre-service courses at all levels (i.e., Certificate III, Diploma and Degree) that link policy, theory and practice and promote effective teaching and learning in the early years.

We maintain the need for specialised early childhood courses, covering the age range birth to eight years and all formal ECEC settings (i.e., prior to school and the early years of school). Within this context, we strongly support the current requirement for pre-service teachers to work with children birth to two years and are proud to note that our new Bachelor of Education (Early Childhood) includes 15 days working with this age group (exceeding current course accreditation requirements).

We also maintain the need for enhanced qualification and career pathways, which value and build on prior accredited education and training. We believe that the Draft Report falls short with regard to practical strategies to address current workforce issues (e.g., education and training, attraction and retention of qualified educators, professional status and community recognition). Building on current national and state plans, there must be continued attention to the development of the ECEC workforce, including a commitment to ongoing investment in coordinated and quality assured professional development opportunities. We strongly recommend the promotion of ECEC as a profession, and that qualified and quality educators make a lasting contribution to children, families and the nation.

4. We recommend avoidance of a deficit view of the current ECEC service system, in particular, the perception that current service models are unable to meet diverse and changing family needs. In particular, we perceive a serious under-appreciation of the capacity of family day care to provide flexible education and care, including the support and monitoring of in home care.

While our focus remains on formal ECEC services, we are strongly of the view that any ECEC service that attracts public funding should be compelled to meet relevant quality standards, and support the recommendation for nannies to meet NQF requirements as determined by ACECQA. However, we remain concerned regarding the ongoing support and monitoring of individual nannies.

5. We recommend that all ECEC services remain within the scope of the NQF. In line with OECD recommendations, we support and see strength in a national approach to

ECEC in Australia. A particular strength of the NQF has been its coverage of all formal ECEC services, and rejection of historical and outdated divisions between 'child care' and 'early education'. We wish to see this national focus continue and see absolutely no benefit in removing preschools and kindergartens from oversight by the NQF. In fact, we identify a range of negative impacts stemming from this bifurcation, in terms of quality, equity and the cost of duplicative administrative arrangements. Such a move would also undermine the current focus on developing more flexible and integrated child and family services.

6. We are concerned about the unintended and potentially negative consequences of tight definition and application of some proposed funding measures, in particular, the activity test and what may be recognised (and not recognised) within the scope of disadvantage and additional needs. While understanding the need for guidance, we also perceive the need for some flexibility to respond to diverse and emerging child and family needs. In addition, we are troubled by what seems to be a deficit view of children and families who may have additional needs (i.e., the notion that families need to demonstrate a deficit to be eligible for additional funding support).
7. We are concerned about what seems to be a return to market ideology in ECEC. While recognising the Australian ECEC quasi-market and the contribution made by both community-based and private services within this context, we reject market theory as the sole underpinning of our work. While popular in the 1990s, there is a significant body of literature relating to education and ECEC that attests to the failed application of market theory within social services (Brennan, 2013; Cleveland & Krashinsky, 2003; Irvine & Farrell, 2013). We recommend, therefore, strong government leadership and further investments to address the inherent failures of this approach, and a commitment to ensuring a healthy balance between community-based and private ECEC services to ensure the sustainability of the sector, long term.
8. We conclude by noting the importance of language within our profession, and are concerned about the seemingly haphazard terminology used to represent our professional work (e.g., ECEC market/industry/sector; staff/worker/ educator; the idea of parents as consumers) and, most significantly, the potentially divisive terminology of 'child care' and 'early childhood learning', as if they are separate. We recommend continuation of terminology established in the NQF and EYLF, which is reflective of international concepts and terms within ECEC (i.e., early childhood education and care, educator, partnership with families). While we can argue the importance of discourse and how this shapes work and professional identity (Gibson, 2013; Moss, 2006; Osgood, 2006, 2010, 2012), we are looking at this issue from the perspective of educators working in ECEC and in recognition of the important contribution they make to early education and supporting families to give our nation's children the best start in life.

## References

- Bowes, J., & Grace, R. (2014). *Review of early childhood parenting, education and health intervention programs for Indigenous children and families in Australia*. Canberra, ACT: Australian Institute for Health and Wellbeing. Australian Institute of Family Studies.
- Brennan, D. (2013). For-profit child care: to market to market. In S. Maddison & R. Denniss (Eds.). *An introduction to Australian public policy: Theory and practice* (pp. 37–38). Cambridge, UK: Cambridge University Press.
- Brennan, D., & Adamson, E. (2014). *Financing the future: An equitable and sustainable approach to early childhood education and care*, SPRC Report 01/14, Social Policy Research Centre, University of New South Wales.
- Camilli, G., Vargas, S., Ryan, S., & Barnett, S. W. (2010). Meta-analysis of the effects of early education interventions on cognitive and social development. *Teachers College Record*, 112(3), 579–620.
- Cleveland, G., & Krashinsky, M. (2003). Financing ECEC services in OECD countries. Paris: OECD. Retrieved from [www.oecd.org/edu/school/28123665.pdf](http://www.oecd.org/edu/school/28123665.pdf).
- Cloney, D., Page, J., Tayler, C., & Church, A. (2013). Assessing the quality of Australian Early Childhood Education and Care. Policy Brief No. 25, Centre for Community Child Health. Retrieved from: [http://www.rch.org.au/uploadedFiles/Main/Content/ccch/Policy\\_Brief\\_25\\_Quality.pdf](http://www.rch.org.au/uploadedFiles/Main/Content/ccch/Policy_Brief_25_Quality.pdf)
- Cunha, F., Heckman, J. J., Lochner, L. J., & Masterov, D. V. (2006). Interpreting the evidence on life cycle skill formation. In E. Hanushek & F. Welch (Eds.), *Handbook of the economics of education* (pp. 697–812). Amsterdam: Elsevier.
- Gibson, M. (2013). *Producing and maintaining professional identities in early childhood*. Unpublished doctoral dissertation, Queensland University of Technology, Qld, Brisbane.
- Heckman, J. (2011). The economics of inequality. The value of early childhood education. *American Educator*, 35(Spring), 31–47.
- Irvine, S., & Farrell, A. (2013). The rise of government in early childhood education and care following the *Child Care Act 1972*: The lasting legacy of the 1990s in setting the reform agenda for ECEC in Australia. *Australasian Journal of Early Childhood*, 38(4), 99-106.
- Ishimine, K., Tayler, C., & Bennett, J. (2010). Quality and early childhood education and care: A policy initiative for the 21st century. *International Journal of Child Care and Education*, 4(2), 67-80. Retrieved from [http://acecqa.gov.au/storage/7.Ishimine\\_Australia\\_.pdf](http://acecqa.gov.au/storage/7.Ishimine_Australia_.pdf)
- Lally, J. R. (2010). School readiness begins in infancy: Social interactions during the first two years of life provide the foundation of learning. *Phi Delta Kappan*, 92(3), 17-21.
- McCain, M.N., & Mustard, J.F. (1999). *Early years study: Reversing the real brain drain*. Toronto, Ontario: Ministry of Children and Youth Services.
- McCain, M.N., & Mustard, J.F. (2002). *The early years study: Three years later. From early childhood development to human development: Enabling communities*. Toronto, Ontario: The Founders' Network of the Canadian Institute for Advanced Research.

- Moss, P. (2006). Structures, understandings and discourses: Possibilities for re-envisioning the early childhood worker. *Contemporary Issues in Early Childhood*, 7(1), 30-41.
- Moss, P. (2006). Structures, understandings and discourses: Possibilities for re-envisioning the early childhood worker. *Contemporary Issues in Early Childhood*, 7(1), 30-41.
- Mustard, J. F. (2002). Early childhood development and the brain: The base for health, learning and behaviour. In M.E. Young (Ed.), *From early childhood development to human development: Investing in our children's future* (pp. 23-62). Washington, DC: The World Bank.
- Osgood, J. (2006). Deconstructing professionalism in early childhood education: Resisting the regulatory gaze. *Contemporary Issues in Early Childhood*, 7(1), 5-14.
- Osgood, J. (2010). Narrative methods in the nursery: (re)- considering claims to give voice through processes of decision making. *Reconceptualizing Educational Research Methodology*, 1(1), 14-28.
- Osgood, J. (2012). *Narratives from the nursery: Negotiating professional identities in early childhood*. Oxon, UK: Routledge.
- Osgood, J. (2006). Deconstructing professionalism in early childhood education: Resisting the regulatory gaze. *Contemporary Issues in Early Childhood*, 7(1) 5-14.
- Mustard, F. (2008). *Investing in the early years: Closing the gap between what we know and what we do*. Paper prepared for the South Australian Government. Adelaide, SA: Department of the Premier and Cabinet.
- Organisation for Economic Cooperation and Development (OECD). (2006). *Starting Strong II*. Paris: OECD.
- Rolfe, S.A., & Armstrong, K.J. (2010). Early childhood professionals as a source of social support: The role of parent-professional communication. *Australasian Journal of Early Childhood*, 61(3), 60-68.
- Sabol, T. J., Soliday Hong, S.L., Piantra, R.C., & Burchinal, M.R. (2013). Can rating pre-K programs predict children's learning? *Science*, 341, 845-846.
- Shonkoff, J. P., & Phillips, D. A. (Eds.). (2000). *From neurons to neighbourhoods: The science of early childhood development*. Washington, DC: National Academy Press.
- Sumsion, J., Harrison, L., & Irvine, S. (2013). *An investigation of Goodstart Early Learning's centre-based processes in engaging with the National Quality Framework (quality assessment, rating and continuous improvement system) with a focus on building the capacity of Early Learning Consultants*. Unpublished Report. Bathurst: Charles Sturt University. Excellence in Research in Early Years Education Collaborative Research Network.
- Sylva, K., Melhuish, E. C., Sammons, P., Siraj-Blatchford, I., & Taggart, B. (2004). *The Effective Provision of Pre-School Education (EPPE) Project: Technical Paper 12— The Final Report: Effective Pre-School Education*. London: DfES/Institute of Education, University of London.
- Tayler, C., Ishimine, K., Cloney, D., Cleveland, G., & Thorpe, K. (2013). The quality of early childhood education and care services in Australia. *Australasian Journal of Early Childhood*, 38(2), 13-21.



Wong, S., Press, F., Sumsion, J., & Hard, L. (2012). *Collaborative practice in Victorian early years services*. Research Institute for Professional Practice, Learning and Education. Sydney: Charles Sturt University.