



## **Australian Education Union**

### **Submission to the**

# **Productivity Commission's Draft Inquiry Report into Child Care and Early Childhood Learning**

**September 2014**

**Angelo Gavrielatos**  
Federal President

**Susan Hopgood**  
Federal Secretary

**Australian Education Union**  
PO Box 1158  
South Melbourne Vic 3205

Telephone: +61 (0)3 9693 1800  
Facsimile: +61 (0)3 9693 1805  
Web: [www.aeufederal.org.au](http://www.aeufederal.org.au)  
E-mail: [aeu@aeufederal.org.au](mailto:aeu@aeufederal.org.au)

The Australian Education Union (AEU) represents more than 190,000 educator members employed in the public primary, secondary, early childhood and TAFE sectors throughout Australia.

We welcome the opportunity to provide this response to the Productivity Commission's draft report into child care and early childhood learning.

As stated in our initial submission to the Productivity Commission Inquiry into Child Care and Early Childhood Learning, our primary focus is early childhood education and its critical role as the foundation stone of a holistic public education system on which children's developmental and learning needs are set.

### ***Pre-school – supporting universal access***

The AEU welcomes draft finding 5.2 which confirms the evidence base on the benefits of early childhood education:

*Participation in a preschool program in the year before starting formal schooling provides benefits in terms of child development and a successful transition to school.<sup>1</sup>*

In addition to draft finding 5.2 the first section of draft recommendation 12.9, which supports the continuation of universal access to a preschool program of 15 hours per week for 40 weeks in the year before schooling, is overwhelmingly supported by the AEU.

*The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program of 15 hours per week for 40 weeks per year. This support should be based on the number of children enrolled in state and territory government funded preschool services, including where these are delivered in a long day care service.<sup>2</sup>*

We do however have concerns with the second section of recommendation 12.9 which refers to the incorporation of preschool funding into funding for schools.

*The Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool.<sup>3</sup>*

We have learned from experience that unless funding is specifically tied to and reportable against set programs or outcomes, it is very easy for state and territory governments to divert funding to other areas of need. This is clearly shown by the way in which the governments of Queensland, Western Australia and the Northern Territory have used funding allocated to them by the Federal Government after the failure of negotiations to reach Gonski funding agreements prior to the election of the Abbott Government in September 2013. Because the funding was granted without any of the conditions tied to Gonski funding, these three jurisdictions have been able to use the funding in any way they choose, which is totally at

---

<sup>1</sup> Childcare and early Childhood Learning, Productivity Commission Draft Report July 2014; p190

<sup>2</sup> Ibid; p553

<sup>3</sup> Ibid; p 553

odds with the Gonski objectives of improving learning outcomes through increased funding targeted to addressing disadvantage.

It is essential that Federal Government funding for the continuation of universal access to preschool is quarantined to guarantee that state and territory governments use the funding for its intended purposes, in a similar fashion to a National Partnership Agreement.

### ***Quality assurance processes and regulation of ECEC***

The AEU has serious concerns about draft recommendations 7.2, 7.3, and 7.5. We unequivocally oppose any recommendations which advocate the lowering of the qualification requirements for workers in the ECEC industry or the lowering of staff to child ratios. It is seriously concerning and exceptionally short-sighted that the primary justification for the lowering of qualifications and staff to child ratios in these three recommendations is the lowering of costs to for-profit services providers.

The OECD report *Starting Strong III; A Quality Toolbox for Early Childhood Education and Care 2012*, which was referenced in our submission to the Inquiry, was explicit in identifying the risks associated with the conflict between the mounting body of evidence in support of more public spending on ECEC to improve outcomes for children and the political agendas driving ‘market’ based approaches to the provision of high quality ECEC.

*Children do not have votes or lobbying groups to voice their interest. Certainly, research has played a key role in making a case for them; but, oftentimes it is not enough. Other factors are also at play.*

*First, political considerations get factored in. Although a growing body of research consolidates the knowledge base on the economic and social returns on investment in ECEC, such research is not often rigorously exploited by politicians in their agenda setting. ... policy making is a highly complex process and a policy decision is often made not so much on the evidence base but influenced by election cycles, which appeal to voters, i.e. highlighting short-term visible gains. It takes decades to get gains from ECEC, and the short-term pay-offs are often to be smaller.*

*Second, budgetary aspects play in. All ECEC costs are incurred up front, and providing high-quality ECEC can be expensive. Research has shown that structural indicators, such as staff-child ratios, qualified workforce and duration of the programme, are likely to influence child outcomes. Ensuring such quality indicators is not cheap. But school failure and its social costs later in life are far more expensive.<sup>4</sup>*

We urge the Commission to give further consideration to the evidence against the lowering of qualifications and/or staff to child ratios.

---

<sup>4</sup> OECD report *Starting Strong III; A Quality Toolbox for Early Childhood Education and Care 2012* p 18

## Qualifications

### *Recommendation 7.2*

*Requirements for educators in centre-based services should be amended by governments such that:*

- *all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent.*
- *the number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.*

### *Recommendation 7.5*

*To provide services with greater flexibility to meet staffing requirements, ACECQA should:*

- *remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months.*
- *explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.*

The AEU strongly opposes any lowering of qualification or experience requirements for ECEC educators. As stated in our original submission to the Productivity Commission Inquiry, there is significant national and international evidence for high quality ECEC. It is extensively documented in our submission<sup>5</sup>, and we would urge that the Commission gives further attention to the strong body of evidence in research-based publications such as the OECD's *Starting Strong III: A Toolbox for ECEC*<sup>6</sup>; and the Centre for Research in Early Childhood (CREC) *A Comparison of International Childcare Systems*<sup>7</sup>.

There is clear evidence from the OECD report which supports our position that high standards of qualification must be maintained for high quality ECEC to be achieved. It shows that having educators who are well-educated and well-trained is a key element in providing high quality ECEC and achieving positive social and cognitive outcomes for the children in their care.

The OECD also found the inverse to be true; that there is direct link between educators with low-level qualifications and poorer outcomes for children:

*A clear indication of the impact of practitioner quality comes from EPPE (Effective Provision of Pre School Education) research in England (United Kingdom). This study found that higher proportions of staff with low-level qualifications were associated with poorer child outcomes on social relationships with peers and*

---

<sup>5</sup> AEU Submission to the Productivity Commission Inquiry into Child Care and Early Childhood Learning February 2014

<sup>6</sup> OECD Starting Strong III: A Toolbox for ECEC, 2012

<sup>7</sup> Centre for Research in Early Childhood (CREC) *A Comparison of International Childcare Systems*, July 2013

*children's co-operation and were associated with higher levels of anti-social behaviour. (Elliott, 2006; Shonkoff and Philips, 2000).<sup>8</sup>*

We acknowledge that the OECD findings show that it is not necessary for all staff to have high initial levels of qualification, but stress that the findings show clear benefits from higher levels of qualification and their contribution to significantly improving the overall quality of ECEC delivery. There is unambiguous evidence that having well-educated and highly qualified staff creates a more effective work environment as well as having a positive impact on less qualified workers.

*Well-educated/trained staff is better able to create more effective work environments and increase the efficiency of other ECEC staff members.<sup>9</sup>*

*Highly qualified staff can have a positive influence on those who work with them and who do not have the same qualifications.<sup>10</sup>*

The AEU strongly supports the maintenance of the current qualification and experience requirements under the NQF for all educators. Any attempt to water-down the qualifications and experience of ECEC educators would be a significant backward step on the journey to achieving high quality ECEC as well as jeopardising the developmental and learning outcomes for our children.

## **Ratios**

### *Recommendation 7.3*

*Differences in educator-to-child ratios and staff qualification requirements for children under school age across jurisdictions should be eliminated and all jurisdictions should adopt the national requirements.*

### *Recommendation 7.5*

*All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.*

*The New South Wales and South Australian Governments should allow a three month probationary hiring period in which unqualified staff may be included in staff ratios before beginning a qualification, as was recently adopted in all other jurisdictions.*

The AEU supports the setting of a minimum national standard for educator-to-child ratios in the ECEC industry. That minimum standard should not, however, exempt jurisdictions from setting higher standards than those of the NQF. We strongly believe that the ratios of qualified staff to children must be strictly maintained at all times and not averaged over a day

---

<sup>8</sup> OECD (2012) Starting Strong III: A Quality Toolbox for ECEC – Action area 1; Using research to inform policy and the public; Research Brief: Minimum Standards Matter p4.

<http://www.oecd.org/edu/school/48483409.pdf>

<sup>9</sup> OECD (2012) Starting Strong III: A Toolbox for ECEC- Action area 1; Using research to inform policy and the public; Highlights from Research Brief: Qualifications, Education and Professional Development Matter p.1

<sup>10</sup> Ibid; p2

or week. Altering the current NQF requirements in order to reduce costs incurred by for-profit service providers is an unacceptable rationale for jeopardising the learning and developmental needs of young children and their future educational outcomes.

The OECD evidence is unequivocal that minimum standards matter greatly. Educator-child ratios are a key factor in a child's development and are the most consistent indicator of a high quality learning environment.

*Staff-child ratios play a key role in ensuring quality for better child development. Of various research findings, it is the most consistent predictor of high-quality learning environments; it increases the potential for frequent and meaningful interactions between staff and children<sup>11</sup>.*

Maintaining the minimum educator-child ratios at all times is important to ensure the health and safety of the children as well as the educators within the ECEC service.

*Higher staff-child ratios (i.e., fewer children per member of staff) are found to be associated with better developmental outcomes of children, allowing staff to give sufficient attention to important developmental domains and create more caring and meaningful interactions with children, which results in less stress for practitioners. When staff-child ratios are high, children become more co-operative in activities and interactions, and they tend to perform better in cognitive and linguistic assessments. Younger children (infants and toddlers) especially benefit from high staff-child ratios.*

*Higher staff-child ratios are also found to encourage quality in ECEC services, creating less stressful work environments for staff.*

*The quality of the provision is found to improve with the number of adults in the room. Where multiple practitioners work together in a room, there is greater opportunity for supervision, consultation and discussion of work challenges, leading to greater job satisfaction.<sup>12</sup>*

The AEU unequivocally opposes any attempt to trade-off quality ECEC, our children's developmental and learning outcomes and the long term benefits to Australian society, for the short-term financial gains of for-profit providers and the budget-neutral goals of governments. The breadth and depth of national and international research evidence shows that while high quality ECEC costs are up-front and likely to be expensive, the long-term impacts of high quality ECEC will be borne out in the long-term educational outcomes for our children and their contribution to the broader society and the prosperity of this country.

We urge the Commission to give more weight to the significant body of evidence in support of our position in its ongoing consideration of the future of early childhood education and care in Australia.

---

<sup>11</sup> OECD (2012) Starting Strong III: A Quality Toolbox for ECEC – Action area 1; Using research to inform policy and the public; Highlights from “Research Brief: Minimum Standards Matter p2. <http://www.oecd.org/edu/school/49360354.pdf>

<sup>12</sup> OECD (2012) Starting Strong III: A Quality Toolbox for ECEC – Action area 1; Using research to inform policy and the public; Highlights from “Research Brief: Working Conditions Matter p2.