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Response to the Productivity Commission request for additional information

Productivity Commission Enquiry into Education and Care Services, 2014

We wish to respond to several areas of the Productivity Commission *Draft Report into Education and Care Services, 2014*.

Our comments are contextualised by the realities of living and working in a rural locality and draw from our experiences as an Authorised Provider of 4 education and care services that offer programs for children 0 – 12 years.

Summary of responses:

Response 1:

12.3.1 We support placing greater weight on the important role played by ECEC services for building lifelong learning. In rural areas ECEC services also are an important workforce strategy and a site of community connection. We strongly maintain that all families should have access to subsidised ECEC. (Ref: Productivity Commission Draft Report, p. 47)

Response 2:

12.4.1 We support deeming rates that acknowledge the additional costs associated with the provision of ECEC in rural areas (Ref: Productivity Commission Draft Report, p. 47)

Response 3:

12.5.1 We support continued free access to up to 50 hours in early childhood education and care services for eligible grandparents. (Ref: Productivity Commission Draft Report, p. 47)

Response 4:

8.3.1/12.9 We support alternative strategies that generate more flexible service provision, including multi-purpose ECEC services, for addressing short-term care in rural services. (Ref: Productivity Commission Draft Report, p. 48/ p 53)

Response 5:

12.8.1 We support a review of how current support programs operate and investment in more flexible integrated ECEC services that have the capacity to provide integrated early support for children and families. (Ref: Productivity Commission Draft Report, p. 51)

Response 6:

5.2.1 We support the concept of integrated services within rural areas. (Ref: Productivity Commission Draft Report, p. 52)

Response 7:

12.8.1/ 12.9 We support a review of how current support programs operate and investment in more flexible integrated ECEC services that have the capacity to provide integrated early support for children and families. (Ref: Productivity Commission Draft Report, p. 51/ p 53)

Response 8:

8.1.1/ 12.9 We support a review of current definitions of what constitutes 'additional needs' and investment in more flexible integrated ECEC services that have the capacity to provide integrated early support for children and families. (Ref: Productivity Commission Draft Report, p. 51/ p 53)

Response 9:

12.6.1 We support the provision of start-up capital funding and ongoing operational support for mainstream services in rural regional and remote communities. (Ref: Productivity Commission Draft Report, p. 53)

Response 10:

5.1.1 We support the provision of 2 funded days per week of ECEC for children from the age of 3 years. (Ref: Productivity Commission Draft Report, p. 54)

Response 11:

12.10.1 We support preschools remaining part of the National Quality Framework and strongly argue that they should not be transitioned to State and territory responsibility. (Ref: Productivity Commission Draft Report, p. 54)

Response 12:

6.1.1 In rural areas both large and small organisations face difficulties in providing flexible work arrangements for parents. (Ref: Productivity Commission Draft Report, p. 58)

Response 13:

7.1.1 We support increasing the number of qualified teachers in all ECEC services to ensure every ECEC service has qualified teachers who work with all ages. This includes children under the age of 36 months. (Ref: Productivity Commission Draft Report, p. 58)

1. Response to information request 12.3

12.3.1 We support placing greater weight on the important role played by ECEC services for building lifelong learning. In rural areas ECEC services also are an important workforce strategy and a site of community connection. All aspects of ECEC are integral to establishing

future benefits and productivity gains for our Nation. We strongly maintain ECEC should be subsidised for all families. We support:

- 12.3.1.1 Subsidised care remaining available for all families for a minimum of 2 days per week
- 12.3.1.2 Family access follow an established Priority Access guideline.
- 12.3.1.3 Families who are engaged in early intervention or family support programs becoming a Priority 2 Access category.
- 12.3.1.4 Families who do not meet 15 hour activity per week remaining a Priority 3 Access category.
- 12.3.1.5 All rural families having access to 2 days per week of subsidised early childhood education and care services for 3 year olds.

In rural areas, centre based and mobile early childhood education and care (ECEC) services play an important role in connecting families, who may be physically or socially isolated, with other support services. These ECEC services are of particular importance for children who are growing and establishing their approach to early learning and to relationships outside of the home context. The purpose of early education and care is more than a return to work strategy for parents. Research cited by the Productivity Commission's draft report into ECEC (eg: Apps, Mendolia, & Walker, 2012; Barnett & Frede, 2010; Elliot, 2006; Melhuish, 2004; Sylva, Melhuish, Sammons, Siraj-Blatchford, Taggart & Elliot, 2004) demonstrates the lifelong benefits to individuals, the community and the nation of establishing quality ECEC foundations in which children are constituted as strong and resilient learners.

ECEC services are also an essential early intervention strategy, particularly for vulnerable families and families at risk. In NSW 3 year old children are no longer eligible for funded preschool unless they are from low income, or Indigenous families. This has placed further restrictions on how families are able to connect with others, grow support networks and contribute to community life and ignores the complex factors that contribute to 'at risk' learning . Research is demonstrating benefits from access to ECEC for 2 years prior to school (eg Nutbrown, 2012). Similarly, research into brain development has consistently demonstrated the importance of early learning for children in their first 5 years of life (eg Shonkoff & Phillips, 2000). Investment in quality ECEC services in the early years of life is investment in our future community, and provides documented long term returns on government financial support.

2. Response to information request 12.4

- 12.4.1 We support deeming rates that acknowledge the additional costs associated with the provision of ECEC in rural areas

Cost premiums in rural areas arise from a range of factors associated with service provision. These include:

- Increased costs associated with regulation staffing. In particular the cost of recruiting and retaining suitably qualified and experienced staff to meet the National Quality Framework

legislation and standards. In rural areas, an aging workforce is placing increasing pressure on retaining levels of knowledge and expertise within staff teams. There are increased costs associated with strategies that aim to address these issues. For example travel costs to regional centres and cities to attend professional learning; investment in covering the cost of higher education for existing workers, transition to retirement flexible work conditions or amended duties that encourage older workers to remain in the workforce.

- Increased costs associated with the maintenance of facilities. This is particularly evident in the supply of some goods and services that are not available locally. These goods and services are brought in at premium costs.

For example: ASNZ standard approved softfall for play areas may need to be transported more than 300 kms from a supplier to a regional service with an additional vehicle return cost associated with the delivery.

- Increased costs of goods and services. Rural areas face higher costs for most goods and services including fuel, some consumables and a wide range of specialised equipment.

3. Response to information request 12.5

12.5.1 We support continued free access to up to 50 hours in early childhood education and care services for eligible grandparents.

In rural areas grandparents regularly are called on to care for young children when families are in crisis. With few support agencies to step in to manage short term and ongoing care for children from families in crisis, grandparents in rural areas are increasingly essential to sustaining families. These crises may involve hospitalisation, mental health treatment; drug or alcohol treatment, or incarceration of parents outside of the familial home and locality. Grandparents who step in to undertake unplanned and crisis parenting for their grandchildren are faced with difficult decisions about how to continue to work, volunteer and manage their own health challenges. They may be retired and not be financially able to support their grandchildren. Access to free early childhood education and care services is an essential strategy for supporting families in crisis and providing stability for children in the care of grandparents, particularly in rural areas.

4. Response to information request 8.3

8.3.1 We support alternative strategies that generate more flexible service provision, including multi-purpose ECEC, for addressing short-term care in rural services.

In rural areas with fluctuating demand and limited services, short term care may not be a realistic solution to extended absences. It may be more effective to invest in multi-purpose services that can offer a variety of types of programs, placements and have the flexibility to expand or reduce some programs based on changing demand and community needs.

It is important to clearly define what constitutes an 'extended absence' and 'short term care'.

While there is merit in maximising utilisation of a service and benefits to removing the limitations placed on families by approved absences, there are some issues to be resolved in how to make places available to other children on a short-term basis. The disincentives to short-term care include:

- 8.3.1.1 Continuity of care for a child using the service: The benefits of ECEC are well documented and highlighted in research cited by the *Productivity Commissions Draft Report, 2014*. These benefits are limited when a child is placed in an education and care service on a short term basis. A short term place means that the child may not continue in the service because ongoing care may not be available when the short-term place ends. This has a particularly significant impact on young children who are building important attachments outside of their home context. There are risks that the child's learning and relationships are disrupted adding stressors that limit the potential benefits of ECEC to their growth, learning and relationships.
- 8.3.1.2 Financial viability impact on rural services: Fluctuating demand for places in rural communities linked with birthrates, seasonal employment and transient populations means a short-term place may not be filled and therefore not produce income that the ECEC relies upon for ongoing viability.
- 8.3.1.3 Employment impact: families using short term care may not have alternative arrangements available at the end of the care period. This creates disincentives to employers who are not guaranteed that the employee will continue.

5. Response to information request 12.8

- 12.8.1 We support a review of how current support programs operate and investment in more flexible integrated ECEC services that have the capacity to provide integrated early support for children and families.

The types of services used by children attending ECEC include speech therapy, physical therapy, specialist trauma counselling, occupational therapy, dental therapy, nutrition support, vision and hearing screening and follow up services, maternal and child health services. These services respond to the complex range of needs that are part of children's lives, and come with them to ECEC services.

In rural services, an ECEC service is often the first consistent experience a child has outside of their home context. Many additional needs are undiagnosed when children commence at their ECEC service, and many additional needs unfold over the length of time that a child may be with an ECEC service. Within a multipurpose ECEC service, a child may spend up to 12 years in a range of ECEC programs. The current Inclusion support (ISS) programs have limited application to the many and varied children who are using ECEC services, and there are a significant number of children who fall outside of ISS guidelines.

For example, a child with severe dentition problems is affected across a range of learning domains including social and communication; health and well-being; cognition and so on. Early intervention to address dentition may decrease the need for more costly specialist services including speech therapy, and limit the impact that the associated health problems have on a child's early learning and literacy, and later transition to school. In circumstances like these, dental therapy is one important aspect of more complex support needs that exist for the child's family.

6. Response to information request 8.1

- 8.1.1 We support a review of current definitions of what constitutes 'additional needs' and investment in more flexible integrated ECEC services that have the capacity to provide integrated early support for children and families.

In our rural community, a recent review of current users of ECEC services provided by Bega Valley Shire Council shows that 25% of children have additional needs.

Additional needs cover a broad spectrum of issues that affect a child's learning and relationships. A child's growth, learning and relationships are impacted by the contextual aspects of their life like:

- Family context: Intergenerational approaches to parenting, availability of extended family support, experience in parenting, position in family
- Security: Stable housing, Regular income, Transport options
- Health: Pre and post natal care, Family diet, nutrition and dentition, Hearing and sight, access to specialist services

Barriers faced by families with children with additional needs in accessing appropriate ECEC services include how these 'additional needs' are defined, and additional needs are exacerbated by barriers that relate to the stigmatising effect of attempting to access some forms of specialised support. A child's additional needs are often defined within deficit discourses of 'disability' or 'family dysfunction'. In small communities this may be a stigmatising experience and reinforce barriers to creating change. Children with additional needs in rural areas need access to more than ECEC services. They require strong systems that seamlessly connect their families with transport, family support services, financial support services, health care and specialist services including speech pathology, audiology services, dental care, occupational therapy, maternal health care and so on. Barriers are reduced when these services are all available in an integrated mainstream ECEC service to any family.

There are additional costs to ECEC providers associated with including children with additional needs. These costs are linked to:

Human Resources: Investment in professional learning for educators, Contact time release to take part in family meetings and collaboration; Team meetings to develop and synchronise collaborative strategies, Co-ordination and contribution to specialist case planning and meetings, One-to-one behaviour support and inclusive teaching strategies

Equipment, materials and facilities: Investment in improved facilities, high levels of wear/tear on some materials and equipment

Family support services: costs of health care, nutrition, parenting support, extended family support.

7. Response to information request 12.9

Refer to comments in 8.3.1; 12.8.1; 8.1.1.

8. Response to information request 8.2

8.2.1 We support the concept of integrated services within rural areas. The benefits are long standing and include:

- Benefits to families: Access to a range of programs, early intervention and support services that build capacity and sustain well-being of families in non-stigmatising contexts. Siblings remain together, transport demands are reduced, costs of services are minimised.
- Benefits to ECEC Providers: reduced costs associated with operation and maintenance of separate buildings, workforce employment and sustainability, cross team development and flexibility; reduced duplication of infrastructure and processes; opportunities for improvements to service delivery and child protection, health and well-being across programs.
- Benefits to Indigenous and vulnerable community members: increased access to a range of programs and services; non-stigmatising setting for family support; continuation of relationships between family and extended family;

In rural locations the population size, distribution and diverse needs present challenges to providing sustainable and affordable Education and Care services. Combining Education and Care Services in one locale can reduce the cost of duplicated buildings, resources and administrative functions. It also can improve how families are able to access a range of different types of family support services and programs. With many rural families facing issues associated with limited transport, distance and social isolation, co-location increases their capacity to manage the demands of work/ family.

We have seen this model work successfully in one site located in our central business town. However the National Quality Framework (NQF) does not include flexibility for services that are different from the usual and this creates barriers to ongoing service provision and to duplicating the success of this model in other towns. These include:

- the contradictions in legislation that prevent families with children under school age and children of school age from receiving Child Care Benefit for two different programs under one Service Approval (eg After School Care and long day care).
- The duplicated costs of meeting the NQF requirements for staff, quality improvement processes and accountability in services that operate from one location under two Service Approvals
- the cost of capital works to modify, relocate or rebuild existing services

In the words of one Nominated Supervisor: *“Multi-purpose services are a viable solution in many lower socio-economic communities, but yet the Framework & Regulations haven’t provided a box for us to climb into ... it appears the NQF & Regulations expect various children’s services to just bend to the shape they have allowed, not to a shape that communities need.”* (Mandy Jackson, 2/4/2014)

9. Response to Information request 12.6

12.6.1 We support the provision of start-up capital funding and ongoing operational support for mainstream services in rural regional and remote communities.

The case for both capital and ongoing operational funding is complex, but can be summarised by the approach that early investment brings both immediate and long term advantages to communities and to the nation. It enables government nation building policies to be transformed into effective delivery strategies.

In rural areas, these policy investments are best focused on an integration of a range of education and support services within mainstream ECECs. An integrated ECEC rural service will not always align with a short-term financial profit. This reduces incentives for private providers to invest. However, as BVSC has demonstrated, once established and consolidated ECEC services have the potential to grow partnerships and invest in strategies which target the emerging needs of the local communities eg University of Wollongong Early Start Engagement Centres.

Investment advantages:

- services can be tailored and targeted to the specific emerging needs of the community
- services can be integrated and combined to maximise cross functional teams
- investment in the ECEC service will be an investment linked to longer term government nation building policy eg increasing workforce participation, school retention rates, reducing crime, improving health and mental well-being.

- ECEC services can continue to operate despite fluctuations in birth-rate, employment and economic circumstances with the capacity to change focus to support the emerging needs of the community. This means services can build community capital and strengthen vulnerable groups.

10. Response to information request 5.1

5.1.1 We support the provision of 2 funded days of ECEC per week for children from the age of 3 years. This is based on Australian and international research on the benefits of early childhood education for children (eg Heckman et al, 2013; Melhuish, 2004; Rosier, & McDonald, 2011; Nutbrown, 2012; Sylva et al., 2003).

11. Response to Information request 12.10

12.10.1 We support preschools remaining part of the National Quality Framework and strongly argue that they should not be transitioned to State and territory responsibility.

12. Response to information request 6.1

6.1.1 In rural areas both large and small organisations face difficulties in providing flexible work arrangements for parents. These impediments are linked with operational constraints and include:

1. Ensuring there is a supervisor and/ or other resources available to employees who are working outside normal core hours
2. Additional costs to the organisation to provide facilities, equipment and resources to enable an employee to work on days when the organisation would not usually operate
3. Inability to monitor that an employee is undertaking work-related activities during core hours when working from home
4. Some positions involve duties and responsibilities that need be performed during core business operational hours. For example, positions that primarily involve face-to-face contact with the public like Customer Service and Children's Services. These positions have limited application outside of core organisational business hours. Providing flexible working arrangements for these positions would incur additional costs to the organisation. Flexible working arrangements can therefore produce unintentional inequities in entitlement and experience for employees in these areas. In rural areas, the costs of attracting, training and retaining staff are already high and any additional costs become a burden that threaten ongoing viability of services/ organisations.

13. Response to information request 7.1

7.1.1 We support increasing the number of qualified teachers in all ECEC services to ensure every ECEC service has qualified teachers who work with all ages. This includes children under the age of 36 months.

The Productivity Commission *Childcare and Early Childhood Learning Draft Report*, 2014 has drawn on a range of research that evidences the importance of the early years of a child's life. During the first three years of life early brain development occurs at a rapid rate. The experiences that a very young child has will impact how their brain grows and their understanding of relationships with others

Early childhood teachers have the expertise and knowledge for providing programs that enhance a child's growth, learning and relationships. This is supported by reviews of Australian and international research:

Evidence on the impact and effectiveness of early childhood education and care shows there is a compelling knowledge base which demonstrates that enriched learning environments are fostered by better qualified practitioners, and that better quality environments and pedagogies facilitate better learning outcomes
(Elliot, 2006, p 31)

The National Quality Framework (NQF) has captured the essential components of quality programs, and is informed by Australian and International research. This research supports the connection between quality, qualifications and good outcomes for young children (Degotardi, 2010; Mathers et al, 2011; Munton et al, 2002; Siraj-Blachford et al, 2002) For example, Huntsman states:

The most significant factor affecting quality appears to be caregiver education, qualifications and training—aspects of structural quality; and caregiver non-authoritarian beliefs on childrearing. (Huntsman, 2008, p iii)

Educators with teaching qualifications are essential to the range of knowledges that inform programs for children under 3 years, and to the expertise that informs. Removing the expertise of degree qualified teachers creates another artificial divide between ‘care and education’. This approach devalues the importance of the very early years to a child’s lifelong approach to learning and relationships and fails to recognise the important messages emerging from:

- research on brain development in the early years of life
- research on the importance of language experiences in the early years of life to future learning
- research on the importance of high quality interactions and relationships for infants and toddlers
- research on the interconnectedness of the professional learning context(Dalli & Urban, 2010; Gallagher & Clifford, 2000).

Research emphasises that infants and toddlers from disadvantaged backgrounds are particularly in need of high quality environments, well-informed educators and qualified teachers. (Gialamas et al., 2013; Phillips & Adams, 2001). This has been well-summarised in the Nutbrown review, 2012:

This requires: ...An increase in the number of qualified teachers with specialist early years knowledge who lead practice in settings, working directly with babies, young children, and their parents, using their pedagogical expertise to support young children’s learning, play and development. (Nutbrown 2012, p.10)

The findings are further supported by the experiences of educators in the Australian context. As a cadet teacher working with children 0 – 3 years said:

A teacher working with infants and toddlers brings a deeper understanding of children and their learning and a whole range of different experiences to share with families and the team. It’s not just about dealing with parents, but we’re also learning from each other. I can’t imagine what it would be like to have only people with Certificate III training trying to deal with the complex learning issues that arise for some of the children, supporting families who are managing so many different personal issues and mentoring people new to the industry like trainees. Our children are worth so much more than that. (Lee Newlyn, 2014)

The New Zealand government has summarised the literature that identifies the important characteristics of quality ECEC with infants and toddlers. The 2011 overview lists 11 key features which require an advanced teacher level of knowledge, expertise and skills in early childhood education. These include:

1. *Teachers who act as intersubjective partners optimise opportunities for learning and development and foster infants' and toddlers' capacity to learn.*
2. *Teachers who employ distinctly specialised practices for infants (e.g., under-one-year) and toddlers*
3. *Teachers who are knowledgeable about contemporary theories of development and learning (including neuroscience) and provide curricula that are individually, socially and culturally relevant*
4. *Teachers who understand the role of play in learning for these specific age groups*
5. *Teachers who have the ability to interpret and respond to the subtle cues offered by infants and toddlers across diverse cultural contexts*
6. *Ongoing, consistent and stable relationships (attachments) between teachers and infants and toddlers, as well as with their families*
7. *Specialised teacher education or professional learning opportunities that emphasise intersubjectivity in infant and toddler pedagogy*
8. *Positive working environments for teachers which facilitate low turnover of staff, enhance the status of teachers and are conducive to attunement with infants and toddlers within ongoing relationships.*
9. *Small group sizes*
10. *High adult:child ratios*
11. *Professional teacher education programmes (Dalli et al, 2011)*

Conclusion

In conclusion, we urge the Productivity Commission to continue to prioritise making quality ECEC services accessible, affordable and available to all children and families, and to acknowledge the particular issues that face rural communities in providing ECEC services.

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