

INDEPENDENT EDUCATION UNION (IEU) OF AUSTRALIA RESPONSE TO THE PRODUCTIVITY COMMISSION DRAFT REPORT ON CHILDCARE AND EARLY CHILDHOOD LEARNING

The Independent Education Union (IEU) represents the interests and professional rights of teachers and support staff in Catholic and Independent schools, early education and care services and other non-government educational institutions Australia wide. It currently has a membership of approximately 75,000 members. There are six IEU branches, generally reflecting the state and territory boundaries - these are QLD/NT, NSW/ACT, VIC/TAS, TAS (Independent), SA and WA. In particular, the IEU represents early childhood teachers working in preschools, kindergartens¹, long day care services and occasional care centres.

The Independent Education Union of Australia believes that early childhood education and care services play a crucial role in promoting children's social, cognitive and personal development while supplementing parental care.

The IEU has been active in the numerous inquiries relating to Early Childhood Education and Care and has referred to the matters contained within the Terms of Reference for the Productivity Commission and in particular to the following submissions:

- Productivity Commission 2011 Early Childhood Development Workforce Study
- 2014 Review of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care
- 2014 Senate Standing Committee on Education and Employment Inquiry into the Delivery of Quality and Affordable Early Childhood Education and Care

Introduction

The IEU commends the Productivity Commission for its extensive review of research and its acknowledgement that the quality of early childhood education and care (ECEC) environments has an impact upon children's development.

However, the IEU believes that the implementation of a number of the draft recommendations of the review will fail to support the development and maintenance of good quality programs for young children, and are likely to result in unintended adverse consequences.

This is because the Commission:

- Does not take into account the problems posed by the policy contexts that preceded the COAG reforms and the development of the National Quality Framework;
- Lacks clarity regarding the conceptualisation of quality and its utilisation; and
- Fails to recognise the distinct features of good quality ECEC. These features ensure that ECEC is developmentally responsive to the care and education of very young children through creating an environment that is necessarily different to that of school education.

¹ For reference purposes within this submission, the term preschool will be used to include kindergarten services in QLD.

Further, a number of sections of the report contain logical inconsistencies that need to be re-examined if robust, sustainable policy is to result from the Commission's efforts.

Unfortunately, the collective impact of the Productivity Commission draft recommendations undermines the progress made through recent reforms. Specifically, the draft recommendations:

- Re-create the care and education divide (Recommendations 7.9);
- Lower quality (Recommendations 7.2; 7.3; 7.5);
- Further fragment the system by tailoring financial support for ECEC to working parents (Recommendation 12.4)

Executive summary

The primary focus for ECEC policy on the needs, interests and rights of children forms the platform for the IEU response. This involves attention to the quality of ECEC delivered.

Importantly, quality is as relevant to the nature of children's daily developmental experiences as it is to their developmental outcomes over time.

Families using mainstream services – improving the accessibility, flexibility and affordability

1 The IEU supports Recommendation 12.2:

The Australian Government should combine the current Child Care Rebate, Child Care Benefit and the Jobs Education and Training Child Care Fee Assistance funding streams to support a single child-based subsidy, to be known as the Early Care and Learning Subsidy (ECLS). ECLS would be available for children attending all mainstream approved ECEC services, whether they are centre-based or home-based.

However, the IEU calls for additional Government funding for the sector to safeguard its viability and address the significant pay inequity within the sector.

The IEU rejects the extension of current funding for ECEC being made available to nanny services.

2 The IEU supports Recommendation 12.4:

The Australian Government should fund the Early Care and Learning Subsidy to assist families with the cost of approved centre-based care and home-based care.

However, the IEU calls for the calculation of “deemed cost” to be based on quality indicators of qualified staff and high adult to child ratios in order to ensure that all children have access to quality ECEC.

Additional needs children and services – improving the accessibility, flexibility and affordability

3 The IEU supports recommendation 12.6 which provides for three capped programs to support access of children with additional needs to ECEC services.

In addition, the IEU supports recommendations 12.7 and 12.8 which provide for support for children “at risk” and with a diagnosed disability.

4 The IEU supports Recommendation 5.2:

Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

Further, the IEU calls for an increase to the existing funding of the sector as it believes that the objectives of recommendations 12.6 and 5.2 cannot be achieved within the existing envelope of funding.

Workforce participation

5 The IEU supports Recommendation 6.1:

The Fair Work Ombudsman, and employer and employee association should trial innovative approaches to:

- *Increase awareness about the ‘right to request flexible work arrangements’ and individual flexibility arrangements under the Fair Work Act 2009 and National Employment Standards”*
- *Promote positive attitudes among employers, employees and the wider community towards employers, employees and the wider community toward parents, particularly fathers, taking up flexible work and other family friendly arrangements.*

Preschool – supporting universal access

6 The IEU supports Recommendation 12.9 in relation to Universal Access:

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.

Further, the IEU commends the Productivity Commission for this recommendation and would further advocate for:

- **the expansion of universal preschool access to cover two years before commencing primary school; and**
- **Recognition and maintenance of the community based preschool/kindergarten sector.**

7. The IEU rejects Recommendation 12.9 (second paragraph):

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 preschools.

8. The IEU rejects Recommendation 7.9:

Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under relevant education legislation.

9. The IEU rejects 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.*

The IEU supports the maintenance of the NQF in relation to the quality indicators of staffing qualifications and adult to child ratios.

10. The IEU rejects 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.

11. The IEU rejects 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.*

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.

12. The IEU rejects recommendation 7.6 in relation to the:

- *Abolish the “excellent Rating, so that ‘exceeding national quality standards” is the highest achievable rating.*

13. The IEU supports the concepts contained within Recommendation 7.10:

State and territory governments should, as a matter of priority, harmonise background checks for ECEC staff and volunteers by either:

- *Advancing a nationally consistent approach to jurisdiction based ‘working with children checks’ as preposed in the national framework for protecting Australia children including mutual recognition of these checks between jurisdiction; or*
- *Implementing a single nationally recognised working with children checks.*

In particular IEU supports the implementation of a single nationally recognised working with children checks as the more effective option.

14. The IEU supports Recommendation 11.1:

Governments should ensure, through regulatory oversight and regular audits by the Australian Skills Quality Authority, that Registered Training Organisations maintain consistently high quality standards in their delivery of ECEC- related training.

Foundational Areas Needing to Be Addressed by the Commission to ensure the delivery of Quality Early Childhood Education and Care

The following sections outlines issues foundational to the development of sound ECEC policy which IEU believes are not fully taken into account in the draft recommendations of the Commission.

1 Early Childhood Education and Care policy must centre on the needs, interests and rights of children

Australian ECEC has been the subject of considerable policy scrutiny internationally since the turn of the millennium (see for instance, the OECD's Thematic Review of Early Childhood and Care in 2001 and 2006). In 2000-01, Australia participated in the OECD Thematic Review of Early Childhood and Care, and met with criticism for the fragmented nature of its ECEC system (OECD, 2001). In its commentary on Australia, the review team commented that:

The ad hoc development of early childhood policy over the years in relation to the needs of parents, the workplace, and the economy, has tended to subsume the needs and interests of children as being synonymous. There are tensions in this, and it is opportune to reflect on current policy priorities from a perspective that places the interests and needs of children to the fore. (OECD, 2001, p.37)

As this quote highlights, ECEC sits at the junction of a number of policy objectives. These include, but are not limited to: parental labour force participation, welfare reform, early intervention and prevention for children considered 'at-risk', school readiness, business viability and children's rights (Press, 2006).

Thus ECEC policy must contend with multiple demands that are frequently in competition.

These tensions created by competing demands are evident in both the framing and the recommendations of the Productivity Commission Report.

The Terms of Reference provided to the Productivity Commission skews policy for young children's care and education in a way that places children's needs as secondary to that of adult workforce participation. The Report determines the efficiency and effectiveness of the ECEC system by the impacts upon women's workforce participation. This is a regressive step for the early childhood education sector.

Children's needs and interests must be placed first in the development of ECEC policy.

The primary focus for ECEC policy on the needs, interests and rights of children forms the platform for the IEU response. This involves attention to the quality of ECEC. Importantly, quality is as relevant to the nature of children's daily experiences as their developmental outcomes over time.

The IEU draws the Productivity Commission's attention to the recommendation of the OECD Country Note for Australia (OECD 2001, p.46) that:

Taking the issue of children's rights seriously would enable the development of a vision for ECEC which could give 'structures, policy and practice ... a reference point which begins with the child.

2 Early childhood education and care policy must recognise the interrelationship between education and care

According to the International Labor Organization (2012, p.36):

Integration between care and education is essential, irrespective of whether ECE organization is split between childcare from birth to 3 years and from 3 years to start of school, or is a unitary model covering the entire age range from birth to the start of compulsory schooling.

Over a decade ago, *Starting Strong 1* recommended that ECEC systems have a strong and **equal** partnership with education systems. It advocated a unified system that would more comprehensively address the needs of younger children, and ‘enable smoother transitions for children, **and the recognition of early childhood pedagogy as an important part of the education process**’ (OECD 2006, p.58, our emphasis).

John Bennett, previous head of the OECD Thematic Reviews of ECEC Policy, advocates for early childhood education to exert a positive influence on schools, arguing that the current split results in an overemphasis on cognitive development to the ‘detriment of care and social attachment’. He suggests that schools have much to learn from the approaches and impact of early childhood education in relation to the importance of teacher-child relationships and their caring function (Bennett, 2003).

These positions are supported by the longitudinal Effective Provision of Preschool Education (EPPE) study in the United Kingdom, which found that the early childhood education programmes with the biggest impact combined education and care (Sylva et al. 2003).

3 Early childhood education and care policy must support the complexity of early childhood education

The report of the Commonwealth Childcare Advisory Committee *Childcare Beyond 2001* highlighted the “*contrast between the high level of commitment many early childhood professionals bring to their complex role compared with the wide undervaluing and misunderstanding of their contribution*” (p.43).

A difficulty facing early childhood education is the popular perception that learning occurs within ‘school-like’ environments and involves didactic teaching methods. However, young children require distinct environments that are highly attuned to their developmental, individual and family characteristics.

The IEU rejects recommendations which encourage governments to incorporate funding for preschool into funding for schools, and extend school services to include preschools.

The learning environments of early childhood education are distinct to that of schools and this distinct nature must be protected through separate funding mechanisms.

The additional needs of early childhood learning environment would too easily be overlooked in a “one size fits all” approach to education funding. In such a model of funding, cut backs to quality early childhood learning environment would be made as funding is averaged out per child enrolment across the years of schooling.

The IEU believes that it is paramount for good early childhood education policy to preserve the distinct nature of early childhood learning environments from ‘schoolification’ if Australia is to deliver quality outcomes to children.

Additionally the Commission’s recommendations on the incorporation of preschools into schools ignores the reality of the existence of over 1000 not for profit community preschool and kindergartens across Australia who deliver higher quality education and care as evidenced by assessment and rating results.(ACEQUA)

This draft recommendation puts at threat the current delivery of quality early childhood education delivered by not for profit community preschool/kindergarten services. The raison d'être of early childhood education provided by a not for profit community preschool/kindergarten is the educational development and wellbeing of young children. If the not for profit community preschool and kindergartens services are hampered by funding restraints, then the quality and quantity of early childhood education will be reduced.

The IEU believes that good early childhood education policy would support the quality education that is delivered by not for profit community preschool/kindergartens.

In early childhood education settings, teachers:

- **Plan, implement and evaluate a play based curriculum** to reflect the individual interests, development, needs and experiences of all children enrolled at the centre;
- **Work in teams** with other educational professionals to create a curriculum appropriate to the children in their services. They require sound skills in teamwork and negotiation;
- **Have frequently changing cohorts of children.** Children frequently attend ECEC programmes on a part time basis, have differing daily starting and finishing times, and may commence and finish their time at the service at any time during the year. This means that teachers and educators can be working with varying groups of children from day to day as well as throughout the year, must become familiar with, and build meaningful relationships with a great many individual children and families, and have the skills to work well with changing groups of children.
- **Must communicate regularly with families and often negotiate sensitive matters,** especially when children are in need of additional support and assistance;
- **Must frequently liaise and share information with other professionals** to support the needs of children and families with additional needs.

The IEU believes it is important to emphasise that the knowledge base required to develop an appropriate curriculum for very young children can be masked by its play-based nature.

When children are seen to be happily playing in an ECEC environment, an observer may interpret this is a result of the natural propensity of children. However, such an observation fails to consider the high degree on informed decision-making that is required.

According to EPPE, high quality ECEC combines education and care and promotes children's intellectual and social development. It requires that educators:

- Have knowledge and understanding of the curriculum;
- Have knowledge of how young children learn;
- Engage in sustained shared thinking with children to work "together in an intellectual way to solve a problem, clarify a concept, evaluate an activity, extend a narrative etc " (Siraj-Blatchford et al. 2002, p.9);
- Are skilled in supporting children to resolve conflicts and support children in being assertive;
- Help parents to support children's learning in the home.

A UNESCO Policy Brief on Early Childhood states that:

The workforce in early childhood in all countries must respond to two related developments: the divide between care and education is breaking down; and the professional role is becoming more complex, with growing recognition of the importance of working with parents and other services and of the competence of young children as learners. (Moss, 2004)

The IEU believes that the recommendations of the Commission which seek to reduce the requirement for staff qualifications for children under three; ‘average out’ the number of qualified staff required throughout the week; and distribute funding in ways that split care from education; fail to recognise the skill based required to be an effective early childhood teacher.

4 Early Childhood Education and Care Policy must deliver quality to the children and to parents.

The IEU finds the Report’s lack of definitional clarity around ‘quality’ of ECEC extremely problematic.

The terminology of the report slips between the use of “quality”; “high quality”; “appropriate quality”; and “acceptable quality” as if these terms are interchangeable.

Further evidence of the muddled understanding of quality is the report’s claim that “*premium childcare services*” “*signal quality dimensions to parents*”.

Although it can be legitimately argued that access to allied health services provide a “quality dimension” by enabling appropriate early intervention to mitigate risks to children’s development, the aspects of service provision labelled “quality dimensions” by the Commission such as “*iPads, handcrafted cots, European bed linen*” cannot be considered contributors to quality for children in the same way that components such as staffing are, though they may be attractive to parents.

In this section of the report (p450), the Commission confounds additional services to parents, with quality for children and thus confuses *marketing* with the provision of good quality ECEC. Interestingly, these apparent “quality dimensions” that are used for marketing high cost services are not subject to the same scrutiny by the Productivity Commission that the considerable research linking staffing components to quality is.

Without a clear understanding of quality, it is difficult to see how the Productivity Commission can make claims such as the following:

While improving quality could involve some additional costs for both governments and parents, there are a number of regulatory areas in which burdens faced by ECEC providers (and consequently, prices charged) could be lowered, without compromising quality (2014 p.35).

In sections of the report, the Commission appears to use the NQS as a proxy for quality. However, its subsequent recommendations dilute NQS inputs for the provision of quality programs (e.g. in relation to staff qualifications) and remove a significant component of the ECEC sector, such as preschools from the remit of the NQS.

Thus, it cannot ‘measure’ the impact of its recommendations.

Although the Productivity Commission acknowledges the positive impact of high quality ECEC, particularly for children over three, it does not pay sufficient attention to the potential for adverse impacts from children’s participation in poorer quality programmes.

Poor quality is more likely to result in poor developmental outcomes (NICHD, 2000) including lower standardised academic assessment scores during middle childhood (Vandell and Corasanti, 1990 cited in Burchinal, Roberts, Riggins, Zeisel, Neebe & Bryant, 2000) and heightened behaviour problems (Vandell and Wolfe, 2000). Children considered ‘at risk’ are especially susceptible to potentially detrimental impacts of poor quality (Peisner-Feinberg et al., 1999). Harsh and/or unresponsive interactions threaten children’s development (Lerner,

Behrman, Young and Reich 1995) and stressors such as insufficient cognitive stimulation, poor nutrition, and maladaptive social interaction can impede development (Karoly, Greenwood, Everingham, Hoube, Kilburn, Rydell, Sanders and Chiesa 1998).

The IEU believes that the Productivity Commission's recommendations should more appropriately seek mechanisms to minimize risks to children's development and safe guard against poor quality early childhood education and care.

The IEU believes that quality ECEC matters for the children's present, as well as their future.

In its comment on ECEC in Australia, the OECD argued that Australia should give consideration to 'the balance between the benefits for the "child of today" in rationales for ECEC policy and the broader social, economic and political goals' (2001, p.48). Early childhood programs are spaces for childhood and, as such, must attend to children's present as well as their future. The nature of the early childhood program, including its curriculum, its staff and the general suitability of physical environment, can make children's days pleasant or stressful, enriching or deprived. This necessitates attention to how the experience of early childhood education might affect children, not only over the long term but also in the 'here and now'.

Research findings highlight the need to focus on the daily reality of children's experiences in early childhood programs, as well as anticipated outcomes. Children in good quality ECEC settings appear happier, display better attachment to caregivers, show greater interest and participation, and are more likely to be emotionally secure and self confident (Vandell and Wolfe, 2000; Howes and Hamilton cited in Helburn and Howes, 1996). In poor quality settings however, children may be stressed and disengaged.

It is for these reasons, that the IEU believes that it is important that the National Quality Framework be maintained.

5 Early Childhood Education and Care Policy must maintain the standards of the National Quality Framework

The National Quality Framework and associated COAG reforms have gone a long way toward addressing long-standing problems in Australian ECEC policy by working toward more policy cohesion and raising standards to be more reflective of the research. It has attracted widespread support, successfully engaging all levels of Australian government and the commitment of the early childhood field to improve standards.

The Early Years Learning Framework, for instance, is Australia's first national early childhood curriculum document and may be the first national curriculum to be introduced across a federated system of government (Sumsion et al., 2009). It is in the enviable position of having attracted widespread professional support, regardless of service type and level of qualification. Internationally, it is respected for the way it supports a high level of professional practice without usurping professional judgement.

The IEU is concerned that a number of the draft recommendations of the Commission use the lowest common denominator as the measure of quality.

The IEU opposes draft 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.*

The IEU opposes draft 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.

The IEU supports the maintenance of the NQF in relation to the quality indicators of staffing qualifications and adult to child ratios. There is sound evidence from research that the ratio of staff to children and employment of qualified staff makes a positive difference in early childhood education programs.

The IEU has maintained the position that, where regulations or practices exist that provide for better staff to child ratios, such arrangements should continue and opposes any attempt to reduce staff to child ratios.

Further, the IEU believes that national quality standards should reflect international best practice as outlined in the OECD research; namely staff/child ratios of at least 1 adult to 3 children for infants; at least 1 adult to 4 children for one to two year olds and at least 1 adult to 8 children for three to five year olds.²

The IEU rejects Recommendation 7.9:

Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments.

The National Quality Framework has been one of the most significant policy decisions for the delivery of quality education to children under school age. The inclusion of all funded service types in a single national framework is essential to ensuring universality, consistency and equity for all Australian families.

The majority of preschools in NSW and kindergartens in Queensland are not for profit community-based services; they are not part of the state education system.

The recent years has seen significant progress towards demonstrating and acknowledging the inter-relationship between care and education, services providing the best start for all children regardless of service type.

Removal of preschool/kindergarten from the NQF would result in families not being able to compare ECEC and make informed decisions about the best service for their child.

The IEU does not support any attempt to create a division between preschool/kindergarten and Long Day Care/Family Day Care. Such a diversion will only lead to a diminution of quality education delivery across the different services.

Similarly, *the IEU also opposes draft recommendation 7.6 which seeks to abolish the ‘Excellent’ rating, so that Exceeding National Quality Standard is the highest achievable rating.*

This recommendation 7.6 typifies the internal contradictions of the Productivity Commission report which elsewhere states:

² OECD (2012)

By making it easier for families to identify higher quality services, a regulatory system that includes information provision mechanisms can also provide an additional incentive for services to exceed minimum quality standards (p.266).

Excellent services can become sites for modelling high quality practice, as was the case with Centres of Excellence in New Zealand.

Many community based early childhood education centres have achieved the “Excellent rating”.

The IEU believes that the recommendation should seek to make the access to assessment of the Excellent rating more affordable to all services; rather than remove the rating entirely.

6 Early Childhood Education and Care Policy must recognise that staff qualifications are essential for all age groups

The IEU believes that quality early childhood education and care is provided only through tertiary qualified early childhood teachers, supported by qualified early childhood teacher assistants and child care educators.

The IEU supports the current National Quality Framework requirements for qualified staff, in particular the mandatory employment of early childhood teachers. We believe that the requirement for the engagement of qualified early childhood teachers is the necessary commitment to raise the overall quality of early childhood education and care provision in Australia.

Teachers with specialised early education qualifications possess significantly greater knowledge and skills in relation to early childhood development and children learning styles than employees with other qualifications.

Specialist early childhood teachers are knowledgeable in early childhood development and learning and skilled in the development of programs based on the evidence which support children’s learning in individualised way.

The current National Quality Framework recognises this in the mandatory employment of qualified teachers across the age groups.

It is wrong to consider this requirement to be non essential or overly ambitious.

“... The National Quality Framework quality standards are not ambitious, they fall short of the precedents set by ECEC systems overseas in terms of the qualifications required by early childhood staff and compare poorly with those quality standards that are taken for granted in the school education system” (Price Waterhouse Coopers 2011).

Research is unequivocal on the link between staff qualification and training and improved outcomes for children in early childhood education programs.

Specialist early childhood training contributes to better quality in centre based services (Whitebrook, Howes and Phillips, 1989; NICHD, 1999).

More formal education and more specialised training enable educators to offer care that is more stimulating, warm and supportive (NICHD 1996; Phillipsen et al., 1997; Howes, 1992). Highly qualified teachers with specialist training are also more likely to organise materials and activities into more age appropriate environments for children.

In turn, settings with such teachers are more likely to receive higher scores on scales that provide global scores of quality such as the ECERS, ITERS, ORCE, and CC-Home (Vandell & Wolfe, 2000).

Conversely, staff with low qualifications and limited training are at a higher risk of burning out, suffering from depression and poor emotional health that, in turn, risks adverse impacts upon children (Shonkoff, 2011).

In short, early childhood teachers make a difference.

A number of studies point to the positive impact that early childhood teachers qualifications make.

The EPPE findings show that having university qualified teachers working with preschool children has a positive impact on quality and is linked specifically with improved outcomes for children's literacy and social learning at age five.

In addition, less qualified staff were better pedagogues when supervised by qualified teachers (Siraj-Blatchford et al, 2002).

Qualified staff encouraged children to engage in activities with higher intellectual challenges. Bueono, Darling-Hammond & Gonzales (2010) found that a bachelor's degree and specialized training in early childhood education, enables teachers to better "support children's healthy development and school readiness" (p.1).

According to Howes, Smith & Galinsky (1995) "*a BA degree and advanced training encourages more fine-tuned teacher-child interaction – the type of interaction in which teacher responds to teachable moments*" (p.24).

As staff stability is also a contributing factor to the quality of ECEC, it is also important to note the 2011 Productivity Commission finding that lesser qualified staff are "*more likely to work in ECEC with the intention of staying for a short period of time, and teachers and directors likely to stay longer*" (p.74).

For these reasons, IEU believes that staff qualification levels for children under three must be maintained.

Information request 7.1

The Commission's recommendations to minimise qualification requirements for staff working with children under three are troubling and fail to recognise the complex nature of the care an education of a group of unrelated children. The first three years are a developmentally sensitive period and thus the available evidence should be used to develop policy that minimises risk of harm.

Mediocre ECEC is not good enough.

Sims, Guilfoyle and Parry (2005) measured the level of cortisol in children throughout the day at Australian ECEC centres. High levels of cortisol are linked with stress. Their research on cortisol responses in indicated cortisol levels decreased during the day only when centres had high quality ratings. The NICHD Study of Early Child Care revealed rates of insecurity were disproportionately elevated when infants were exposed to such multiple risks as poor-quality (insensitive) care both at home and in non-parental care settings, more extensive care, and less stable care (NICHD, 1996).

Entry level training, such as the certificate III, is important for all those working in ECEC. However, an entry level qualification is not in itself sufficient to ensure a good quality program. The Certificate III does not support the level of complex decision making required for working effectively with young children and their families. The Australian Qualifications Framework describes the Certificate III as enabling “limited responsibility in known and stable contexts within established parameters”. Early childhood education and care is a people intensive environment and, as such, is not predictable. Infants and toddlers are highly vulnerable to the actions of adults and more susceptible to issues concerning health and safety. In relation to educators’ duty of care, it is generally understood that the younger the child, the higher the adult’s duty of care.

Degotardi’s Australian research (2010) showed that more highly qualified early childhood staff are able to engage in better quality interactions with infants. Further, the EPPE study found that less qualified staff were better pedagogues when supervised by qualified teachers (Siraj-Blatchford et al., 2002).

The IEU believes that recommendations 7.2 & 7.5 fly in the face of our growing understanding of the complexity of infant development and the reality of infants’ experiences of formal ECEC, and trivialise the importance of infant development and the expertise required to create good quality infant environments.

In recent years, in line with the phenomena of growing numbers of very young children in formal ECEC environments, there has been a groundswell of research in this area. This research challenges many of the dominant views of and draws attention to dimensions of infant experiences that have previously been overlooked, for example, the importance of social experiences of very young children with one another (rather than focusing on the dyadic caregiver child relationship); and the need to address the ‘emotional labour’ of work with infants (see for instance, the collected research in the following volume -Harrison & Sumsion, 2014).

In short, we are at a period where much more is being discovered about infancy in ECEC. This necessitates greater attention to the skill base of staff, not less. We understand more and more that staff working with infants: require the capacity to be attuned to an age group that cannot articulate their needs in the same way as older children; need to know what they are looking for; have acute observational skills; and the knowledge background to interpret what they are seeing.

In many jurisdictions there is an oversupply of primary teachers, thus it is nonsensical to remove the practicum element of early childhood teacher training. Indeed it would be more beneficial to emphasis the theory and practical element of teacher training for under five services, rather than remove these as a strategy to address the shortage. Additionally, once qualified, an early childhood teacher may practice in any jurisdiction and be placed with any age group and thus must have the capacity to do so.

7 Early Childhood Education Policy must support the recruitment and retention of qualified early childhood teachers.

Achieving the goal of increasing the number of qualified early childhood education teachers and raising the level of qualifications for other qualified staff requires a commitment by governments to act against factors that deter qualified staff from working in the sector.

The low pay of qualified early childhood education teachers and other educational professionals is recognised by governments, service providers and staff themselves as the underlying cause behind the recruitment and retention issues within the ECEC sector.

In fact, the Productivity Commission has recognised this itself, in its 2011 study of the early childhood development workforce that the standing and wages of early childhood teachers were a determinant factor in achieving the National Quality Framework requirements.

*“In order to attract and retain a sufficient number of early childhood teachers to achieve the reforms set out in the National Quality Standard and the National Partnership Agreement on Early Childhood Education, salary and conditions offered by Early Childhood Education and Care services will need to be competitive with those offered to primary teachers in the school sector. Community – and privately managed preschools in NSW will also need to offer similarly competitive salaries and conditions for their teachers, which is already the case in other jurisdictions. Teachers qualified to work in ECEC typically have the option to work in LDC, preschool or primary school settings”.*³

Yet, the current Commission report fails to recognise this matter as significant and recommends that the burden be placed back upon the sector to rectify the issue by raising funds to address the disparity.

This is not possible without support from Government.

The IEU believes that State/Territory and Federal Governments have a shared responsibility to funding a quality early childhood education sector. Early childhood education is a public issue not just for an individual good.

8 Early Childhood Education and Care Policy must recognise that ‘market forces’ are not enough to create an equitable system.

Despite the 2011 Productivity Commission Report asserting that: *“market pressures alone are unlikely to lead to the provision of quality early childhood education and care – an appropriate regulatory system is required”*, the current Report adopts a market paradigm. Even though it recognises the existing tension between cost and quality the Commission fails to safeguard the quality of children’s experiences through:

- Recommending funding reforms that erode the viability of the non-profit sector; and
- Positioning the non-profit sector as ‘irrational’ in how it makes budget decisions because they decisions are focused on considerations of equity.

The quality of children’s care and education is central and needs to be benchmarked.

To date the practices and advocacy of the non-profit sector have played an important role in benchmarking quality outcome for children. Secondary analysis of the NICHD data by Sosinsky, Lord and Zigler (2007) revealed that, in general, non-profit centres provided higher quality care. In a comparative review of the funding of child care in the Netherlands and the UK Lloyd and Penn’s (2010) cite research by de Kruif et al. (2009), that indicates that the quality of child care in the Netherlands is deteriorating under its switch to demand side funding. Vincent, Braun and Ball (2010) noted that many of the working class families they investigated in relation to child care choices in the United Kingdom were unable to change child care provider, even though they were not satisfied.

According to the ILO: *The type of funding – direct to services versus subsidies to parents – may have an impact on overall quality. Evidence from OECD member countries suggests that direct public funding of services brings more effective governance of early childhood services, advantages of scale, better national quality, more effective training for educators and a higher degree of equity in access compared with parental subsidies (OECD, 2006: 14). (ILO 2012, p. 22-23).*

³ Productivity Commission (2011)

The IEU rejects the assumption of the Productivity Commission that the ECEC sector can regulate and fund teacher salaries with out additional government assistance.

It is an incorrect assumption that the not for profit community ECEC sector can raise funds unaided by Government. There are no true market forces for the early childhood education sector.

The sector must have the support of state and government funding.

The IEU calls upon the Productivity Commission to recast its focus on funding in order to ensure that services are able to pay professional wages which reflect the level of qualifications required. This will aid in the attraction and retention of qualified teachers.

Conclusion

The current draft recommendations in the Draft Report are short term, quick fix solutions that, if implemented, will significantly compromise the provision of quality early learning experiences for children in formal early childhood settings, and exacerbate entrenched workforce issues.

The IEU does not consider these recommendations to be in keeping with the Productivity Commission's role of enabling "governments (to) make better policies, in the long term interests of the Australian community" (Productivity Commission, 2014, p. ii).

The IEU calls upon the Productivity Commission in its final report to provide recommendations which builds upon, improves and safeguards the delivery of quality early childhood education and care sector; not minimize it.

We seek from the Commission recommendations which would deliver an early childhood education policy that has the capacity to provide high quality care and education to enhance the development of all children.

To do so, the Commission must recognise that children are learning from birth and in all contexts; and what children learn is profoundly influenced by the nature of their environments and the qualifications, skills and knowledge base of the adults who have responsibility for them.

Bibliography

- Bennett, J. (2003) Starting strong: the persistent division between care and education, *Journal of Early Childhood Research* 1, 21-48.
- Bueno, M., Darling-Hammond, L., & Gonzales, D. (2010). *A matter of degrees: Preparing teachers for the pre-K classroom*. Washington, DC: Pre-K Now.
- Burchinal, M., Roberts, J., Riggins, R., Zeisel, S., Neebe, E. and Bryant, D. (2000). Relating quality of center-based child care to early cognitive and language development longitudinally. *Child Development* 71(2), 339-357.
- Commonwealth Child Care Advisory Council (2001). *Child Care: Beyond 2001: A report to the Minister for Family and Community Services*. Canberra, Commonwealth of Australia.
- Degotardi, S. (2010). High quality interactions with infants: Relationships with early childhood practitioners' interpretations and qualification levels in play and routine contexts. *International Journal of Early Years Education*, 18 (1), 27-41.
- Halfon, N., Gonzalez, T. and Hochstein, M. (1999). *Building Bridges for California's Young Children: A 12 Point Agenda to Enhance Proposition 10*, California Policy Research Centre.
- Harrison, L. & Sumsion, J. (2014). *Lived Spaces of Infants in Childcare*. Springer
- Helburn, S. and Howes, C. (1996). Child Care cost and Quality, *The Future of Children* 6, 62-84.
- Howes, C. (1992). Child outcomes of child care programs, *Issues in child care*, In B. Spodek and N. Saracho (eds), New York, NY, Teachers College Press.
- Howes, C., Phillips, D. and Whitebrook, M. (1992). Threshold of quality: Implications for the social development of children in center-based care, *Child Development* 63, 449-460.
- International Labor Organization (2012). *Right beginnings: Early childhood education and educators*. http://www.ilo.org/wcmsp5/groups/public/@ed_dialogue/@sector/documents/meetingdocument/wcms_171717.pdf
- Karoly, L., Greenwood, P., Everingham, S., Hoube, J., Kilburn, C., Rydell, P., Sanders, M. and Chiesa, J. (1998). *Investing in Our Children: What we know and don't know about the costs and benefits of early childhood intervention*, Rand Corporation.
- Howes, C., Smith, E. & Galinsky, E. (1995). *The Florida Child Care Quality Improvement Study: Interim Report* New York: Families and Work Institute.
- Larner, M., Behrman, M., Young, M. and Reich, K. (2002) Caring for infants and toddlers: Analysis and recommendations. *The Future of Children* 11, 7-20.
- Lloyd, E., & Penn, H. (2010). Why do childcare markets fail?: Comparing England and the Netherlands. [Article]. *Public Policy Research*, 17(1), 42-48.
- OECD (2001). *Starting Strong 1: Early childhood education and care*. Paris: OECD.
- OECD (2001) *OECD Country Note: Early Childhood Education and Care Policy in Australia*, Paris: OECD.
- OECD (2006). *StarPress*, F. (2006). *What about the kids? Policy directions for improving the experiences of infants and young children in a changing world*. Commission for Children and

Young People, NSW; Commission for Children and Young People, Queensland, National Investment for the Early Year *Strong II: Early childhood education and care*. Paris: OECD.

Press, F. (2006). *What about the kids? Policy directions for improving the experiences of infants and young children in a changing world*. Commission for Children and Young People, NSW; Commission for Children and Young People, Queensland, National Investment for the Early Years

NICHD Early Child Care Research Network. (1999). Child outcomes when child care center classes meet recommended standards for quality, *American Journal of Public Health*, 89 (7), 1072-1077.

NICHD Early Child Care Research Network (2000). The relation of child care to cognitive and language development, *Applied Developmental Science*, 4 (3), 116–135

NICHD Early Child Care Research Network. (2001). Child Care and Children's Peer Interaction at 24 and 36 months. *Child Development*, 72 (5), 1478-1500.

NICHD Early Child Care Research Network. (2002). Early child care and children's

development prior to school entry: Results from the NICHD study of early child care. *American Educational Research Journal*, 39 (1), 133-164.

Peisner-Feinberg, E. and Burchinal, M. (1997). Relations between preschool children's child-care experiences and concurrent development: The cost, quality and outcomes study. *Merrill - Palmer Quarterly*, 43 (3), 451-477.

Peisner-Feinberg, E., Burchinal, M., Clifford, R., Culkin, M., Howes, C., Kagan, S., Yaelin, N., Byler, P., Rustici, J. and Zelazo, J. (1999). *The Children of the Cost, Quality and Outcomes Study Go to School: Technical Report*, Chapel Hill, Frank Porter Graham Development Centre.

Phillipsen, L., Burchinal, M., Howes, C. and Cryer, D. (1997). The prediction of quality from structural features of child care. *Early Childhood Research Quarterly*, 12(3). 281-303.

Price Waterhouse Coopers (2011). *A Practical Vision for Early Childhood Education and Care*. <http://www.pwc.com.au/industry/government/assets/ecec-Mar11.pdf>

Productivity Commission (2011). *Early Childhood Development Workforce*. http://www.pc.gov.au/__data/assets/pdf_file/0003/113907/early-childhood-report.pdf

Moss, P. (2004). *The Early Childhood Workforce in "Developed" Countries: Basic Structures and Education*, UNESCO Policy Brief on Early Childhood No. 27, UNESCO

Shonkoff, J. and Phillips, D. (Eds) (2000). *From Neurons to Neighbourhoods: the science of early child development*, Washington, DC, National Academy Press.

Shonkoff, J. (2011). Protecting Brains, Not Simply Stimulating Minds. *Science*: (333) 6045, 982-983.

Sims, M, Guilfoyle, A, and Parry, T., Children's well-being in child care (2005). Families Matter: *9th Australian Institute of Family Studies Conference*, Melbourne, 9 – 11 February 2005.

Siraj-Blatchford, I., Sylva, K., Muttock, S., Gilden, R. & Bell, D. (2002). *Researching Effective Pedagogy in the Early Years*. http://www.ioe.ac.uk/REPEY_research_report.pdf

Sosinsky, L. S., Lord, H., & Zigler, E. (2007). For-Profit/Nonprofit Differences in Center-Based Child Care Quality: Results from the National Institute of Child Health and Human Development Study of Early Child Care and Youth Development. *Journal of Applied Developmental Psychology, 28*(5-6), 390-410.

Sylva, K., Melhuish, E., Simmons, P., Siraj-Blatchford, I., Taggart, B. & Elliot, K. (2003). *The Effective Provision of Pre-School Education (EPPE) project: Findings from the pre-school period: Summary of findings.*

Sumsion, J., Harrison, L., Cheeseman, S., Kennedy, A. & Stonehouse, A. (2009) Insider Perspectives on Developing Belonging, Being & Becoming: The Early Years Learning Framework for Australia, *Australasian Journal of Early Childhood, 34* (4) 4-13.

Vandell, D. L., & Wolfe, B. (2000). *Child care quality: Does it matter and does it need to be improved?* University of Wisconsin-Madison: Institute for Research on Poverty.

Vincent, C., Braun, A., & Ball, S. (2010). Local Links, Local Knowledge: Choosing Care Settings and Schools. *British Educational Research Journal, 36*(2). 279-298.

Whitebrook, M., Howes, C. and Phillips, D. (1989). *Who cares? Child care teachers and the quality of care in America. Executive summary of the National Child Care Staffing Study,* Oakland, CA, Child Care Employee Project.