

Response to the Productivity Commission Childcare and Early Childhood Learning Draft Report from the Queensland Children's Services Alliance

Introduction

The Queensland Children's Services Alliance (QCSA) is an independent and integrated alliance of peak organisations and large service providers that reflects the diversity of children's services in Queensland. Membership of the Alliance currently spans all types of education and care services (e.g. Centre-based Childcare, Preschool/Kindergarten, Family Day Care, Outside School Hours Care, Playgroup), private and community-based service providers, and a number of related professional organisations (e.g. inclusion support, education and training institutions). While acknowledging and respecting differences in missions and interests, we have established a set of shared aims to drive and inform the work of the Alliance. These are:

- To continue to promote the wellbeing of all children in children's services;
- To strengthen the status of the children's services sector and promote the identity and integrity of children's services professionals in Queensland;
- To facilitate collaboration between the various children's services stakeholders;
- To provide a forum for discussion and debate;
- To work toward a more informed and more cohesive voice around collective children's services issues.

QCSA views the provision of high quality education and care services as a shared responsibility, spanning government, business and industry, the children's services sector, families and communities. This is based on evidence that shows that supporting families to give children the best start in life, and investment in quality education and care services, provides multiple educational, social and economic benefits to our society.

We aspire to a comprehensive, integrated and sustainable system of education and care services that is responsive to diverse child and family needs, ensures that children benefit from inclusive quality services and programs, and recognises the professional nature of the work of educators in these services.

With this vision in mind, we commend the consultative and rigorous approach taken by the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning*, and share our response to the draft report. This submission is the product of a group meeting of QCSA members, participation in a range of related forums, and a broader email conversation. Once again, the Draft Report, and its insights and



recommendations, has provided the basis for considerable discussion and debate, and this submission draws together key points from this exercise.

Broad Agreement

Amongst QCSA members, there is broad agreement and support for some general themes and proposed policy directions noted within the Draft Report.

- **Continuing government leadership and investment.** We view access to high quality education and care services as a public good, and, as such, acknowledge the critical role that government plays in education and care in Australia. While viewing education and care as a shared responsibility, there is a need for strong and informed leadership and we see a continuing role for government in this area.
- While understanding the current fiscal environment, we recognise that the service system we aspire to requires an appropriate level of investment, if it is to provide the immediate and longer-term benefits and returns we are seeking for children, families and our nation. We advocate the need for additional investment in the short and longer-term, and commend the Productivity Commission's decision to argue for funding beyond the current funding envelope.
- **Balancing objectives for a quality education and care system.** We recognise the different objectives of government in funding and supporting the education and care system (e.g., promoting early learning and supporting parental workforce participation). We see these as linked, and both demanding investment in high quality services to ensure that children enjoy and benefit from their time in the service and parents are confident in their service and productive at work. Moreover, there is a need to maintain a balance between the immediate and longer-term. While it may be tempting to look at trade-offs in terms of flexibility, quality and affordability in the short-term, we believe this will cost the nation more in the longer term (e.g. in terms of our future workforce and economic productivity, civil society, missed opportunity to improve outcomes for some children and families).



- **Continuing implementation of the National Quality Framework.** We commend ongoing support for the National Quality Framework (NQF) and see this as a timely and important driver for an enhanced education and care service system. Collectively, we acknowledge the strengths of the NQF (e.g. the national approach; focus on key quality determinants; performance-based standards; integration of minimum quality (regulations) and aspirational quality standards and emphasis on continuous quality improvement). While implementation of any new policy initiative demands additional administrative time and effort in the short term, we see evidence (across our various service types) that the NQF is indeed increasing access to higher quality education and care services. However, this remains dependent on there being no change to fundamental quality determinants such as the qualifications of educators working with children birth to 3 years (See page 6 for QCSA response to this recommendation).
- **A simplified subsidy model.** In principle, we support moves toward a simplified funding model, based on reasonable cost, that provides increased financial support to families who need it most. It is our view, however, that further consideration needs to be given to what constitutes 'reasonable cost' and the impact of geographic location on the cost of quality service provision. We also believe that funding and subsidies must be underpinned by a government commitment to support universal access, recognising these services as a public good, in the same context as schools.
- **Recognising the importance of Outside School Hours Care.** QCSA also recognises the vital role that quality school age care services play in promoting positive child outcomes and supporting parental workforce participation. We support the focus on ensuring the availability of high quality Outside School Hours Care (OSHC) services on school sites, and the proposed introduction of national standards relating to qualifications and ratios for educators in OSHC.
- **Universal access to preschool.** We see universal access to preschool (kindergarten in Queensland) as an integral component of a comprehensive and integrated education and care service system, and commend the recommendation for continued government funding and support for this purpose.



It is our strong view however, that these services must remain within the ambit of the NQF. We also reject any resurrection of artificial and unhelpful distinctions between 'care and education' and advocate the need for qualified educators and quality educational programs for all children (birth to five years) in prior to school settings.

Workforce

As identified by the commission in the Draft Report, "a professional and skilled workforce is critical to achieving quality ECEC services and consequent learning and development outcomes (2014, 466). QCSA drawn the commission's attention to the Australian Governments Early Years Workforce Strategy and advocates that resources are allocated to the strategy in a coordinated approach. This strategy was developed in response to the workforce issues experienced by the sector and published by the The Standing Council on School Education and Early Childhood in September 2012.

The Strategy addresses five key areas relevant to early childhood education and care:

- Providing a professional early childhood education and care workforce through:
 - Supporting professional development and leadership opportunities
 - Promoting the professionalism of the ECEC workforce to the wider community
 - Recognising professional practice
- Ensuring a growing workforce to continue to meet community demand by:
 - Promoting early childhood careers
 - Promoting existing training programmes and pathways
 - Supporting Aboriginal and Torres Strait Islander people to build careers in ECEC
- Aiding early childhood educators to gain the qualifications and skills the workforce needs to continue to provide high quality care by:
 - Facilitating greater uptake of existing training initiatives
 - Supporting the higher education and training sector to continue to deliver high quality, relevant and flexible training to the ECEC sector
 - Reviewing training initiatives
- Fostering the creation of a responsive workforce, one which can address the needs of all children through:
 - Enhancing the capability of educators to meet the needs of children from diverse social and cultural backgrounds



- Developing the capability of ECEC educators to further develop skills in working with children with diverse needs and connecting them with appropriate support services
- Facilitate collaboration amongst members of the broader early childhood development workforce by:
 - Supporting qualifications that enhance the skills of ECEC educators to work effectively with other ECD professionals
 - Promoting evidence-based integrated service practice
 - Improve the Australian evidence base on ECD.

A skilled and capable workforce is vital to enabling services to meet the quality requirements highlighted by the commission and outlined in the National Quality Framework. Access to properly planned and effectively implemented professional development and support for all educators is essential to develop and maintain an appropriately equipped workforce across all levels and across all service types. With only 30% of services having currently been assessed under the National Quality Framework, the continued implementation of this framework requires that the ECEC workforce is provided with relevant and topical professional development and professional support opportunities. In addition, workforce continuity and retention of staff is essential to providing the high quality services highlighted by the commission. Investment in effective professional development and support has been used as an effective as a strategy to retain staff (Waniganayake et al 2008).

Research by Waniganayake, M, Harrison, L., Cheesemean, S., De Gioia, K., Burgess, C and Press, F, (2008, 119) highlighted that effective professional development has a number of key features including:

- The extension of the professional development program over a period of time
- The involvement of staff in assessing their own learning
- The creation of opportunities for staff to apply new knowledge and skills in their own work settings
- The creation of opportunities for staff to have a trusted 'other' to discuss developing practice



Currently professional development opportunities such as those outlined above are provided to the ECEC sector through a number of organisations and funding programs by all levels of government, and large and small organisations. These opportunities include:

- The Professional Support Coordinator Program – an initiative of the Australian Government under the Inclusion and Professional Support Program.
- The Long Day Care Professional Development Program
- Access to professional development and subsidised training and advice through paid membership to peak bodies
- Through training and professional development funded by State Governments, Local Councils and other large organisations and delivered by a variety of organisations including peak bodies.

QCSA advocates that investment in effective professional development and support should continue to be a shared responsibility between individuals working in the sector, organisations and governments. In addition, QCSA highlights that since 2006, when the Australian Government centralised delivery of professional development and support under the Inclusion and Professional Support Program, the available professional development has been easier to access and more visible than prior to this program.

The role of early childhood educator is complex and currently individuals in these roles with Australian Qualifications Framework level three qualifications are required to undertake much higher level and decision making skills than the level three training prepares them for. In this context QCSA recommends no changes are made to minimum qualification levels and that those which were agreed to in the National Quality Framework should remain as they are.

Qualifications

Response to Draft Recommendation 7.2

The early childhood period is considered the most important developmental phase throughout the lifespan. The human brain develops at an amazing rate during the first year of life and continues to develop rapidly in the subsequent two to three years. It is the daily experiences and relationships that babies and children have which literally shape their brains. Quality early environments are crucial to brain development and form the foundation for future health, wellbeing and learning. Sensitive, responsive caregiving, cognitive and language stimulation and a safe and

healthy environment are key ingredients of quality early childhood environments. These positive interactions, which directly affect the way a brain is wired, are integral to long term success and achievement in later life.

Conversely, poor quality environments deprived of adequate sensory, social or emotional stimulation can result in a weak foundation detrimental to future brain development. The influence of negative early experience on brain architecture can result in vulnerability and detrimental stress for brain development. An environment deprived of adequate sensory, social or emotional stimulation can result in faulty brain circuitry for infants and toddlers. For children to reach their full potential they need a variety of stimulating experiences in the earliest years when they can gain the most benefit.

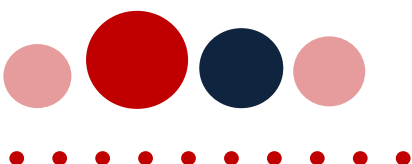
The quality of early childhood education and care rests on the ability of the educators to provide secure, consistent, sensitive and stimulating environments. The availability of well-trained early childhood professionals is an established predictor of the ability to provide quality care (Adamson, 2008). It is with this knowledge we strongly recommend that early childhood teachers have qualifications with theoretical and practical experience for children aged birth to twenty four months.

This component must be considered an investment, not a cost. Numerous studies indicate that for every dollar spent on early childhood development the returns (in terms of success at school and in the workplace) can be many times the amount invested (Rolnick & Grunewald, 2003). Ensuring the healthy cognitive, social and emotional development of young children needs to be the priority of governments, communities and families. Early childhood is indeed the determinant of future health, wellbeing and learning ability.

QCSEA is concerned about the proposal that those working with children under 36 months are required only to have the certificate III qualification for the reasons outlined above and recommends that the current minimum qualification levels outlined in the National Quality Standards are retained.

Inclusion

Children undergoing diagnosis - We are unable to find any mention of children undergoing diagnosis or children with mental health concerns in the draft report. The IPSP currently provides ongoing support to ECEC services with children who are undergoing diagnosis. Lack of diagnosis can be due to many varied barriers,



long waitlist in paediatric services through the public health system (in some instances up to two years), health professionals reluctant to diagnose, that is, to place a label on a young child and parents who are reluctant to accept that their child may require additional support. For example, the current average age for a diagnosis of a child with autism spectrum disorder is five or six years old, that is too late for early intervention but often educators can identify something is wrong before doctors are able to determine a diagnosis. In all of these cases the ECEC requires access to support and funding to successfully include the child in a quality care environment. We believe that a better way to assess children who have additional needs is required rather than through formal diagnosis and some additional thinking on what level of subsidy is appropriate.

Services access to one off funding to build capacity – Is this funding a one off for the child or the service who has a child with additional needs attending? This is not clear in the draft report. One off funding is not a worthwhile investment if it is not coordinated and targeted. Where there is a significant investment and very little measurement of the outcomes it is difficult to ascertain what value for money is occurring because of that investment. How is this funding going to be administered to ensure that it does build the capacity of the service and services are held accountable to this funding? This funding could be administered using a similar model to the current Inclusion Support Subsidy, an Inclusion Support Agency (ISA) receives a referral from the service, an Inclusion Support Facilitator (ISF) visits the service and develops an Inclusion Improvement Plan (IIP) with specific needs identified and a timeframe for action. The ISF would go back within the timeframes established in the IIP and report on the success (or barriers) on the services inclusion capacity.

Specialist /Suitable Services – There appears to be an implication that consideration is being given to a model of “specialist ECEC services”. It has not been clearly identified if this is referring to services that would be disability specific, such as the AEIOU model that is currently operating for children with autism spectrum disorder or if this is referring to services that would be preferential for children with additional needs.

It is stated that these services (not all) would then have increased staff capability and facilities – to “one or more children with similar additional needs” (PC 2014, 541). Also that for these services may have a “higher staff to child ratio” (PC 2014, 541) or “staff with specialist skills who require higher wages” (PC 2014, 546).

Further discussion— “it would not be cost effective for mainstream child care to deliver to only a few children with additional needs” and that there would be a “concentration of capabilities in ECEC providers should ensure that families can access a more suitable and affordable service” (PC 2014, 547).

As this is unclear, it is difficult to determine the philosophy that is being applied in this model. If it is that consideration is being given to children with additional needs not having access to mainstream ECEC services it would be a contradiction to the statement on page 16, where the Commission's Aim for ECEC “Additional needs children should have (at minimum) access to ECEC on same basis as other children”. This is further reinforced by the PC (2014, 29) “the Commission's approach should increase the number of services able to take these children (with additional needs) as well as the subsidised hours that these children are able to participate to bring their ECEC access more into line with other children”.

The setting up of “specialist” services does not align with Access and Equity principles, the National Quality Framework or Anti-Discrimination legislation. This model also runs the risk of further alienating children from their same age peers and setting up a model of exclusion, this model would also present issues when considering transition into formal schooling.

QCSA believe that this requires more consideration and clarity about what the model is that is being proposed. We do not believe the establishment of specific services for children with additional needs is an appropriate model of service delivery. We suggest that the current ISA service delivery model (with adjustments made to ISS funding amounts) is the most responsive, socially inclusive model.

Deemed Cost

QCSA supports a simplification of the child care subsidy system. However, we are concerned to ensure that the new subsidy proposed by Productivity Commission (PC) delivers affordable child care for the vast majority of families using child care, and that it maintains affordability over time. The ‘deemed cost’ model proposed by the PC, with a median fee used to establish a benchmark price would, by definition leave up to half of all families paying higher relative fees.

We support a deemed cost set at a higher rate so it acts as a daily cap for child care fees, for example a benchmark price set at 2.5 standard deviations above the mean at around \$108 would ensure affordability for most families while ensuring the Government is not subsidising luxury services. We are also concerned that the new activity test may make early learning and care unaffordable for many vulnerable and low income families.



Outside School Hours Care

Response to draft recommendation 7.1

QCSA do not support a 'separate' set of standards for OSHC, however, do support contextualising the NQS for OSHC. This contextualisation should not serve to water down the current standards but instead tailor the standards to the context of outside school hours care.

There is much opportunity to improve the assessment and rating process for OSHC while ensuring a more accurately informed context. This could be achieved through adding rigour to the self-assessment process, improving the quality of the QIP and acknowledging the service's practice wisdom in their own communities. QCSA believe that the assessment process should be undertaken by professionals with current knowledge and recent experience in regard to school age care pedagogy and practice as this heavily influences the outcome of the assessment process.

Draft Recommendation 7.4

In this, QCSA agrees with the Peak body for Outside School Hours Care (OSHC) in Queensland – the Queensland Children's Activity Network and the commission - nationally consistent ratios and qualifications for OSHC should be progressed. QCSA will support a ratio of 1:15- being the maximum number of children per educator as the minimum standard. Where single staff models exist this ratio must be less and consistent with standards set for school age children in other parts of the children's services sector such as Family Day Care.

A national standard for qualifications in OSHC is essential but should enable the sector to draw on the diversity and skills of the broader community which can enhance children's leisure time. Current standards for qualifications should be retained until such time as an research provides evidence which supports changing the qualification standard in this sector. QCSA would encourage the PC and governments to consider innovative approaches to the development of knowledge, skill and competence on the job such as the Core Knowledge and Competency (CKC) Framework for OSHC. This approach focuses on upskilling endorsed Workplace Mentors to facilitate learning and development on the job for educators who have no qualification or are working towards qualifications from another discipline.



Draft Recommendation 8.2

QCSA advocates that consideration is given to the infrastructure and planning of OSHC services so that suitable facilities are provided for this purpose and that the facilities provided do not compromise the quality of care for school age children attending OSHC. Schools benefit greatly by having access to a quality OSHC on their school site and monetary gain shouldn't be the main focus of these benefits. In addition to the recommendation that governments direct schools to take responsibility for facilitating the provision of OSHC, schools should also be directed to facilitate and support the provision of future facilities taking into account the growth in school communities and the rising demand for care.

Preschools

Draft recommendation 8.5

QCSA is concerned by a number of the Commission's recommendations that indicate the intention to move preschool into schools wherever possible. Formal school systems are structured around a set of frameworks, practices and performance requirements that are at odds with early education frameworks based on play. A strong evidence base exists for the use of play-based curriculums in early childhood education, which is why it has been incorporated into the Australian Early Years Framework[i]. Unfortunately the structure of formal school systems is not conducive to implementing play-based curriculums. This has been highlighted following Queensland's relatively recent integration of children aged five years into schools. A more formalised curriculum now exists for five year olds that is centred around activities and outcomes that leave little time for play-based learning. In light of this, delivering preschool services in schools and removing them from the scope of the NQF carries a significant risk that children will be subject to formal curriculums that are not tailored to their development.

Shifting more preschool services into schools combined with removing dedicated preschools from the scope of the NQF while keeping Long Day Care (LDC) services in scope also raises concern. This move will lead to inconsistent curriculums across preschools cohorts. This inconsistency could have the following impacts:

- Confusion among families as they make decisions about their child's education
- Perceptions over quality of education provided that can lead to inequity
- Recruitment issues, particularly in rural and remote areas, as early years educators move between services.



QCSA recommends that the Commission keeps all preschool services in scope of the NQF and that any schools delivering preschool services are monitored to ensure they are implementing play-based curriculums.

Nannies

Draft Recommendation 8.5

QCSA is concerned about the implementation of the suggested changes to 'Approved Nannies' mentioned in Draft Recommendation 8.5. We strongly support the minimum qualification requirements of ECEC related Certificate III, or equivalent, and similar staffing ratios as Family Day Care.

Our concern is the compliance component of the recommendation where the Commission suggests that both random and targeted inspections be undertaken by regulatory authorities. The link to Draft Recommendation 8.6 where the in home category is removed once nannies are brought into the approved care system fails to acknowledge the amount of in home care that is undertaken in Queensland where families are between 1000 and 2200kms from the Coordination Unit and or the relevant State Government offices.

QCSA recommends that appropriate consideration is given to the differences between Nannies in metropolitan areas versus the large areas of rural and remote Australia where the same rules will not be sustainable. The current support offered by government for families in challenging locations needs to continue as the need for suitable early childhood care and education is even more a priority when other support services are difficult to access.

References

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