Brief Comments addressing elements of the Child Care and Early Learning Draft Report.

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INFORMATION REQUEST 12.5

*The Commission seeks information on the impact that removing the current free access of up to 50 hours a week to ECEC services for eligible grandparents will have on them and the children for whom they care.*

There is an increasing number of grandparents who are caring for grandchildren ([Centre for Community Child Health, 2010](#_ENREF_5)). Children needing grandparent care are often traumatised from family violence, addiction and other stresses, meaning that managing their behaviour can be particularly challenging. Without grandparent care many of these children would enter the foster care system at a time when this system is stretched beyond capacity. The research demonstrates clearly that the financial, physical, health, wellbeing and emotional costs faced by these grandparents are significant ([Bulanda & Bulanda, 2008](#_ENREF_4)). Grandparents caring for grandchildren are more likely to be unhealthy, have to postpone retirement plans and suffer financial hardship. They often loose friendships (because peers do not always welcome children at a time in their lives when they want to remain free from caring responsibilities) and find it difficult to build support networks. Their overall wellbeing is often poorer. Grandparents need the support made available to them through supported child care places. Should this support be removed there is greater likelihood that some grandparents will no longer be able to manage caring for their grandchildren, and these children will, of necessity, need to be placed in the foster care system at greater cost to the state and an increased risk of poorer outcomes for the children.

**DRAFT RECOMMENDATION 8.5**

***Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny.***

***National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services.***

***Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.***

If nannies are to be required to hold the same qualifications as Family Day Care workers then they should also be subject to the same conditions as Family Day Care workers. This includes being a member of an accredited scheme, and under the supervision of an appropriately trained supervisor.

**DRAFT RECOMMENDATION 13.1**

***The Australian Government should continue support for the current block funded ECEC services for Indigenous children to assist their transition to mainstream ECEC funding (where there is a viable labour market).***

***Regulatory authorities should work with providers to assist them in satisfying the National Quality Framework and managing the transition to child-based funding arrangements.***

This recommendation is based on the assumption that current block funded ECCE services should transfer to mainstream ECEC funding as soon as possible. However a recent review of funding models for Indigenous early childhood services found that: “Imposing the CCB/CCR model could jeopardise the integrated ECEC and family support model that characterises these services and could result in the exclusion of the most vulnerable children and families – the very children and families for whom these services were designed” ([Brennan, 2013, p. 18](#_ENREF_1)). If there is to be any commitment to supporting children and families who are the most vulnerable[[1]](#footnote-1) and to ensure that the necessary support services, such as health, family support and any additional early learning and development programs are available, then the alternative funding models for these services must be maintained long term, not just through a transition phase.

**DRAFT RECOMMENDATION 7.9**

***Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation. The quality standards in state and territory education legislation should broadly align with those in the National Quality Framework. Long day care services that deliver preschool programs should remain within the National Quality Framework.***

Combining all early childhood services under the one national umbrella aims to create a holistic approach to service delivery. A unified approach makes it easier:

* To reduce opportunities for children to fall through gaps in the system
* For authorities to monitor and assure quality
* For costs of monitoring and assuring quality to be centralised under one authority and not distributed across different departments within each jurisdiction
* For families and community to develop appropriate expectations of early childhood services, to recognise quality and to respond to poor quality appropriately
* For early childhood professionals to move between different service types as they build their careers

Removing preschools from the framework exacerbates the divide between care and education. Whilst such a divide is a consequence of the history of the evolution of services ([Sims, 1994](#_ENREF_22), [forthcoming](#_ENREF_25)), it is counter to the best interests of children, particularly to those who are assigned to the lower status services of ‘care’ where lower qualifications for staff and lower standards of quality are recommended by the report.

**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.***

*Information request 7.1*

*The Commission seeks participants’ views on the expected impacts on the development of children under 36 months of focusing required teachers in centre-based care on children over 36 months.*

The experiences children have in the first 3 years of life lay the foundation for life-long learning, development and wellbeing ([Sims, 2013](#_ENREF_24)). An early [UNICEF (2008, p. 7](#_ENREF_26)) report argues “… the mastery of skills that are essential for economic success and the development of their underlying neural pathways follow hierarchical rules. Later attainments build on foundations that are laid down earlier.” Without this foundation, children are placed on a pathway of disadvantage which is clearly evident by the time children are 3 years of age ([Hertzman, 2002](#_ENREF_11)), and over time this disadvantage accumulates unless intensive and appropriate intervention is offered. Many researchers have demonstrated the greater returns gained from preventing disadvantage accumulating compared to ameliorating it when it is present ([Heckman, 2008](#_ENREF_10); [Hertzman & Boyce, 2010](#_ENREF_12); [Institute for a Competitive Workforce, 2010](#_ENREF_14); [Mustard, 2008](#_ENREF_17); [United Nations Educational Scientific and Cultural Organisation, 2010](#_ENREF_27)).

It is necessary to examine Australian research in this area and in particular that arising from LSAC. For example [Coley, McPherson Lombardi, Sims, and Votruba-Drzal (2013](#_ENREF_6)) compared Australian LSAC data with American data and found that :

Specifically, children who attended centre-based care at age 2 had significantly higher teacher-rated maths skills and literature skills, higher matrix reasoning scores, and marginally higher vocabulary skills than their peers who were in parental care during their toddler wave (p43).

There are differences in the way American and Australian children use child care which [Coley et al. (2013](#_ENREF_6)) argue have a significant impact on children’s outcomes and make the use of American research to inform policy in Australia particularly problematic. Australian children are more likely to attend child care part-time before the age of 3 compared to American children, and are more likely to use formal, accredited forms of care whereas American children under age 3 are more likely to be in informal, unaccredited forms of care. The authors emphasise however, that use of child care before the age of 2 in both America and Australia was NOT associated with poorer outcomes in children’s cognitive skills.

Removing the requirement to have skilled teachers working with children under 3 years of age creates a context in which children are more likely to receive lower quality care which increases the risk that they will enter what the report identifies as ‘educational services’ at 3 already disadvantaged. This puts more pressure on these services to address disadvantage that could easily have been prevented. More highly qualified educators are able to provide a better learning environment for children and this improves children’s outcomes. A significant component of that learning environment for children under 3 is the interactions between adult and child which contribute to the development and maintenance of high quality relationships. The neurobiological research demonstrates the quality of relationships between adult and child is a key predictor of long term outcomes ([Feldman, Weller, Zagoory-Sharon, & Levine, 2007](#_ENREF_9); [Hofer, 2006](#_ENREF_13); [Mayes, Magidson, Lejeuz, & Nicholls, 2009](#_ENREF_15); [Meaney, 2010](#_ENREF_16); [Perry, 2006](#_ENREF_18)). Very young children need secure and nurturing relationships and staff in care/education programmes can offer such relationships ([Degotardi & Pearson, 2009](#_ENREF_8)). In Australian research [Yamauchi and Leigh (2011](#_ENREF_28)) demonstrate that toddlers have better outcomes when they have access to more staff in child care. Having better adult:child ratios makes it possible for staff to have time to develop secure relationships and this is facilitated when they have the appropriate training to not only understand that relationship building is a priority, but have learned the skills to be able to do so.

**DRAFT 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***

The experiences children have in the first 3 years of life lay the foundation for life-long learning, development and wellbeing ([Sims, 2013](#_ENREF_24)). Research clearly demonstrates that children under 3 need quality learning experiences in the context of secure, nurturing relationships. The neurobiological research confirms that the quality of relationships between adult and child is a key predictor of long term outcomes ([Feldman et al., 2007](#_ENREF_9); [Hofer, 2006](#_ENREF_13); [Mayes et al., 2009](#_ENREF_15); [Meaney, 2010](#_ENREF_16); [Perry, 2006](#_ENREF_18)). Staff need to be able to attain a balance between relationship building/maintenance and the provision of appropriate learning experiences, and research shows that more highly trained staff are more able to achieve this balance ([Bueno, Darling-Hammond, & Gonzales, 2010](#_ENREF_3); [Degotardi, 2010](#_ENREF_7); [Saracho & Spodek, 2007](#_ENREF_20)).

There are real concerns internationally that teachers not trained in early childhood do not offer the most appropriate learning experiences for young children, and many, in fact, offer learning experiences that are counter to children’s development and wellbeing ([Save Childhood Movement, 2014](#_ENREF_21)). Requiring early childhood educators to have experience with very young children in their pre-service training ensures that the wellbeing of young children remains the key focus. It is recognised that not all early childhood qualified staff choose to work with children under 3 (p282 of the report). However, given that practical experience with children under 3 is a crucial component of pre-service training to ensure quality service delivery, it is not an acceptable option to remove this requirement. Nor, in our opinion, is it acceptable to differentiate training into those who are qualified to work with children birth to 8 versus those who are qualified to work 3 – 8. We take issue with the claim that operating birth – 8 courses limits the pool of staff willing to work in the sector (p282). There are many factors that limit the availability of early childhood educators: poor pay, conditions and status are the most influential of these ([Bretherton, 2010](#_ENREF_2); [Productivity Commission, 2011](#_ENREF_19); [Sims, 2007](#_ENREF_23)) but the requirement to include experience with children under 3 in pre-service training is not one of these.

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1. DRAFT RECOMMENDATION 5.2 suggests that there is: “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” [↑](#footnote-ref-1)