**RESPONSE TO PRODUCTIVITY COMMISSION ON CHILDCARE AND EARLY CHILDHOOD LEARNING DRAFT REPORT**

As Queensland’s largest provider of early childhood education and care services vocational qualifications, TAFE Queensland, Brisbane welcomes the opportunity of submitting this paper to the Productivity Commission on Childcare and Early Childhood Learning in response to the draft report published on 22 July 2014.

We would like to particularly address the report recommendation 7.2 which states:

**“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.” (p. 59).**

TAFE Queensland, Brisbane’s position is that children aged 0 – 3 years old clearly deserve and benefit from educators who hold Diploma of Early Childhood Education and Care qualifications supported by educators holding Certificate III qualifications.

In this submission we would like to highlight the differences between Diploma and Certificate III level qualification and that highly trained professional educators should be responsible for the education and care of children birth to 3 years due to evidence-based neuroscience research.

The Australian Qualifications Framework (AQF) states that a Diploma qualification means educators will have specialised knowledge and skills for skilled/paraprofessional work and/or further learning as well in addition to skills of Certificate III educators who will have theoretical and practical knowledge and skills for work and/or further learning. Knowledge will differ in that Diploma qualified educators will have technical and theoretical knowledge in a specific area or a broad field of work whereas Certificate qualified educators will have factual, technical, procedural and some theoretical knowledge of a specific area of work and learning. In the area of skills, Diploma qualified educators will have a broad range of cognitive, technical and communication skills to select and apply methods and technologies to analyse information to complete a range of activities, provide and transmit solutions to sometimes complex problems and transmit information and skills to others whereas Certificate qualified educators will have a range of cognitive, technical and communication skills to select and apply a specialised range of methods, tools, materials and information to complete routine activities and provide and transmit solutions to predictable and sometimes unpredictable problems. In the area of application of knowledge and skills, Diploma qualified educators will apply knowledge and skills to demonstrate autonomy, judgement and defined responsibility in known or changing contexts and within broad but established parameters whereas Certificate qualified educators will apply knowledge and skills to demonstrate autonomy and judgement and to take limited responsibility in known and stable contexts within established parameters.

Diploma qualified educators have a sound knowledge of child development, legislative requirements, the curriculum framework and planning for the education and care of children at the critical stage of their most rapid and profound development – 0-3 years.

This summary of AQF qualification levels shows that Diploma qualified educators will be operating at a more complex and highly professional level in their work. The following paragraphs outline why this is so important in the lives of very young children.

There has been shown to be a strong link between the educators’ level of education and quality. In the Effective Provision of Pre-school Education study, a key finding was that “settings that have staff with higher qualifications have higher quality scores and their children make more progress” (p. 1) and that more highly trained educators “had the greatest impact on quality, and was linked specifically with better outcomes in pre-reading and social development at age 5”. (p. 4).

The birth to 3 year period is a critically important phase in the development of a child. This is the time of life when children’s brains are forming vital neural pathways which are strengthened with repeated experiences. Whilst a newborn has a brain 25% the size of the adult brain it grows rapidly to reach 90% at the age of three. The field of neuroscience has shown through repeated evidence-based research what early childhood education and care educators have known intrinsically- that birth to 3 years is when most brain growth occurs and what happens in these vital years therefore has a profound effect on children’s lives now and in the future.

This is supported in the Council of Australian Governments document “Policy Overview Regulation Impact Statement for Early Childhood Education and Care Quality Reforms” which informed the National Quality Framework for early childhood education and care services Australia-wide which states that “the early years of a child’s life have a profound impact on future health, development, learning and wellbeing. Positive experiences in early childhood lead to positive productive outcomes for the future. Many children now spend time in early childhood education and care services throughout Australia. The quality of these experiences and interactions is crucial in supporting their future wellbeing.” (p.1).

Money spent on more highly qualified educators in the birth to 3 years age group will save money in the future. In the Harvard University document, “Foundations of Lifelong Health are Built in Early Childhood” it is stated that high quality experiences in early childhood lay the foundation for later school and life success thus, “getting things right” and establishing strong biological systems in early childhood can help to avoid costly and less effective attempts to “fix” problems as they emerge later in life. A child’s environment of relationships can affect lifelong outcomes in emotional health, regulation of stress response systems, immune system competence, and the early establishment of health-related behaviours. Thus, supports for families and appropriate training for providers of early care and educa­tion across all types of care, including informal arrangements as well as established centres, can improve health outcomes throughout the life course as well as enhance the current quality of life for young children and the adults who care for them.”(p. 8).

It is therefore critical for a child’s social, emotional, mental, intellectual and physical development that highly qualified educators are responsible for their education and care which is vital for the present and the future at a time, between birth and three years of age, when brain growth is at the greatest rate in all human development.

Bibliography

1. AQF Levels found at <http://www.aqf.edu.au/aqf/in-detail/aqf-leels/>
2. Council of Australian Governments document “Policy Overview Regulation Impact Statement for Early Childhood Education and Care Quality Reforms” found at <https://www.coag.gov.au/sites/default/files/policy_overview_RIS_early_childhood_development.pdf>
3. Shonkoff, JP and Phillips, DA (eds). 2000. From Neurons to Neighbourhoods: The science of early child development, National Academy Press, Washington, DC
4. Sylva, K., Melhuish, E., Sammons, P., Siraj-Blatchford, I, and Taggart, B. (2004). The Effective Provision of Pre-School Education (EPPE) Project: Findings from Pre-school to end of Key Stage1. London: Institute of Education, University of London, University of Oxford, Birkbeck, University of London, University of Nottingham.
5. Center on the Developing Child at Harvard University (2010). *The Foundations of Lifelong Health Are Built in Early Childhood*. <http://www.developingchild.harvard.edu>

The following are responses to other draft recommendations in the report:

**DRAFT RECOMMENDATION 5.4**

Early intervention programs to address the development needs of children from disadvantaged backgrounds should be underpinned by research. Their impact on the development outcomes of the children attending should be subject to ongoing monitoring and evaluation, including through the use of longitudinal studies. **pg62**

Early childhood education and care includes the principles of equity, fairness, resilience, emotional intelligence and social competence. Therefore all educators have a duty of care to provide all children with a solid, positive, nurturing environment in order for them to fulfil their potential and this can only be done on an equitable basis.

Carefully researched and planned early intervention programs that are monitored and evaluated in a cycle of continuous improvement will benefit children in their early years and then beyond.

**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

Teachers with degrees in education have grounded knowledge in child development, observing children objectively and theoretical bases from which to understand the child and their development.

Neuroscience evidence has shown that in the first year of life there is a ‘window of opportunity’ in a baby’s brain to be wired for all languages and this ability declines over the years.

Research evidence also highlights the crucial importance of positive nurturing relationships in ‘wiring’ a child’s ‘emotional brain’ in the first 2 years of life and getting this wiring ‘wrong’ can/does affect a child’s capacity to learn at school and will have life-long implications.

• 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. **Pg59**

Staffing level needs to be clarified as it this recommendation can be interpreted in many ways. The word ‘temporarily’ is subjective and therefore open to abuse. Boundaries of numbers and length of time are not clear. Ratios when kept to industry- agreed levels lead to better health, safety, care and education outcomes for young children and educators. They should not be compromised for these reasons. The best interest of the child must be upheld at all times.

**DRAFT RECOMMENDATION 7.6**

Governments and ACECQA should:

• urgently reconsider the design of the assessment and ratings system, giving particular consideration to finding ways to increase the pace of assessments

• explore ways to determine services’ ratings so they are more reflective of overall quality

• abolish the ‘Excellent’ rating, so that ‘Exceeding National Quality Standard’ is the highest achievable rating. **Pg60**

The excellent rating is not awarded by ACECQA until an exacting application and verification process has occurred. Services who gain an excellent rating do so after much deliberation and the long term provision of excellent practices. In keeping with other professions, early childhood education and care services should have the right to strive for this rating.

**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. **Pg48**

Given that the statistics reflect that 40% of children in informal care are either cared for by grandparents and nannies in Australia, it follows that minimum qualification requirements for nannies are in the best interests of children; provide equity for children, nannies, educators and parents/guardians; and quality early childhood education and care for children.

**DRAFT 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 Early Childhood Education Care-related training. **Pg61**

All Registered Training Organisations (TAFE and private providers) must deliver good quality qualifications, more than ever now, given the neuroscience research evidence into children brain development. It is anticipated that current and future training packages will incorporate requirements for students to learn about advances in neuroscience.

The new CHC013 national training package has made changes to try to improve the quality of Early Childhood Education and Care qualifications in Vocational Education and Training (e.g. mandatory minimum number of practicum hours and including assessing underpinning/theoretical knowledge).

**DRAFT RECOMMENDATION 12.8**

The Australian Government should continue to provide support for children who have a diagnosed disability to access ECEC services, through:

• access to the mainstream ECEC funding on the same basis as children without a disability and up to a 100 per cent subsidy for the deemed cost of additional ECEC services, funded from the Special Early Care and Learning Subsidy

• block funded support to ECEC providers to build the capacity to cater for the needs of these children, funded through the Inclusion Support Program. **Pg50**

To foster more emotionally intelligent and empathic future global citizens, combining children from diverse abilities and backgrounds in an early childhood education centre will benefit the populous as a whole.

United Nations Convention on the Rights of the Child – Article 2, 23, 28, 29; National Quality Standard Quality Area 5: Early Years Learning Framework – Principles 1,3,4 and Outcomes 1,2,3.

# Thank you for the opportunity to express the position of TAFE Queensland, Brisbane to the Draft Recommendations of Childcare and Early Childhood Learning.