



**Submission to Productivity Commission Draft Research Report – Early Childhood Development
Workforce, June 2011
The University of Newcastle Early Childhood Programs**

Please find following our responses to the draft report. We support and applaud many of the recommendations in the report. Please find our comments in relation to the points we do not support, or wish to see amended:

Chapter 3 Government involvement in the early childhood development sector

DRAFT RECOMMENDATION 3.1

To assist parents' decision making with respect to their choice of early childhood education and care (ECEC) services for their children, governments should require ECEC regulators to publish all relevant information on service quality. Published information should be comprehensive, comparable across services, clearly explained and easy to access.

DRAFT RECOMMENDATION 3.2

To achieve the goals of the Council of Australian Governments' (COAG) ECEC reforms without disadvantaging low-income families through the anticipated increase in fees, governments will need to ensure that there is adequate financial support for such families.

DRAFT RECOMMENDATION 3.3

ECEC regulators should publish the number of service waivers granted, to whom they have been granted, and whether they are permanent or temporary.

DRAFT RECOMMENDATION 3.4

ECEC regulators should provide for ongoing consultation with stakeholders and timely dissemination of best practice. Governments should ensure that all ECEC regulators initiate robust evaluative processes so that regulatory impacts are minimised.

DRAFT RECOMMENDATION 3.5

Where voluntary committees currently manage ECEC services, governments should ensure that professional management support (such as cluster management or other shared services) is readily available to assist with management and leadership.

DRAFT RECOMMENDATION 3.6

In implementing the National Quality Standard, governments should ensure adequate resourcing for regulators to enable appropriate training of their staff in the new regulatory arrangements and their effective implementation.

Yes it is appropriate to ensure accountability and have training and support available. We applaud the publication of information on waivers and strengthening of evaluation procedures. We caution against the concept of “best practice”. This can be seen as an implication or understanding that there is one correct way to do things. A more robust, professional and research-based approach is that of “wise practice” – based on professional knowledge, ethical practice, ongoing education and professional experience.

In creating available professional management support the government needs to be mindful that within voluntary committees there is often little expertise and knowledge regarding early childhood education and care. The qualified teachers/directors of services need to be involved in this training with the management committee to support effective communication and relevant roles and responsibilities of the committee and staff. Furthermore, in consideration of the workloads of Directors, provision should be made for appropriate compensation of time for engagement in such courses.

Chapter 5 The preschool and long day care workforce

DRAFT RECOMMENDATION 5.1

To assist in the transition to the National Partnership Agreement on Early Childhood Education, governments should permit:

- ***any currently employed 3-year-qualified early childhood teacher to deliver the preschool program***
- ***any 3-year-qualified teachers returning to or entering the workforce to deliver the preschool program, provided a plan is in place for them to upgrade their qualification to the equivalent of a 4-ye***

This is an unsatisfactory recommendation. While we recognise the financial and personal difficulties for the sector and individuals, we seek your attention to Draft finding 3.1 *Though the implementation of the universal aspects of the early childhood development (ECD) policy agenda will be costly overall, the targeting of relatively small additional funding to certain aspects of the ECD workforce may deliver substantial additional benefits to the community.* This recommendation is therefore inconsistent with This recommendation would continue to position early childhood educators as holding lower status and professionalism in comparison to primary and secondary teachers. International recognition of the importance of the early childhood years, and the important role of the early childhood educator, was identified within the COAG Report. With the growing professionalisation of early childhood education, to deliberately maintain the educational requirements to a level below that of other teachers would be detrimental to the goals of COAG and children and families. It is recommended that:

Three-year qualified early childhood professionals must show a plan to enrol in degrees to upgrade to 4 year qualifications by 2013, commence by 2014, and show reasonable progress within 4-5 years from commencement. This aligns the recommendation more closely to that for people re-entering the workforce. **Where government policy requires an educational upgrade funds should be made available to support enrolments into university programs as this is very costly for workers who are already poorly paid.** We furthermore recommend government development of a *Recognition of Prior Learning* process to support this process.

DRAFT RECOMMENDATION 9.1

To meet the workforce goals of the COAG ECEC reforms, rural and remote areas will need to attract and retain more workers. Governments should assess the cost effectiveness of existing incentives aimed at increasing recruitment and retention in rural and remote areas. These incentives should be compared against alternative strategies such as:

- ***targeted recruitment of workers from rural and remote backgrounds***
- ***the delivery of training in rural and remote locations***
- ***support for pre-service teachers to experience working life in rural and remote areas.***

DRAFT RECOMMENDATION 9.2

To attract and retain sufficient staff to achieve the goals of the COAG ECEC reforms for children in remote areas, governments should provide all ECEC workers in remote communities with timely access to appropriate housing at reasonable cost, including housing for students undertaking placement.

Government could work with universities, particularly the regional universities, to develop incentive and support programs for students from rural and remote regions. A scholarship scheme needs to be introduced to encourage EC educators to go to rural and remote areas for professional experience whilst at university. Additional scholarships for Indigenous early childhood educators could encourage students from remote areas to upskill and return to their communities.

DRAFT RECOMMENDATION 10.1

The Community Services and Health Industry Skills Council should consider specifying the minimum periods of training and practicum associated with children's services qualifications. These minimum periods should be decided in consultation with ECEC providers.

It is essential that this consultation also include the training and education providers. This would allow decision making to be "evidence-based" – calling on research, rather than pragmatic or idealistic only. All stakeholders in early childhood education must be included in consultations to alleviate the current fragmentation in the sector and build a strong professional sector.

DRAFT RECOMMENDATION 10.4

The requirement for VET assessors to demonstrate knowledge of current ECEC practices should be enforced by VET regulators. The Department of Employment, Education and Workplace Relations should design and implement a program of professional development for VET assessors working in ECEC to identify and address gaps in their knowledge of current practice.

It is recommended that this professional development should be planned and implemented in consultation with the university sector. Assessors could be upgrading educational qualifications while undertaking the professional development, for example, to Masters level and/or undertaking research on this work. This opportunity makes it more appealing to participants.

DRAFT RECOMMENDATION 10.5

Governments should provide the Australian Skills Quality Authority with sufficient resources to establish and maintain processes and staff to ensure ECEC training is of a consistently acceptable standard. The Australian Skills Quality Authority should:

- ***apply more robust conditions for the initial registration of ECEC training providers***
- ***establish a rigorous and targeted system of audits and penalties to ensure that any registered training organisation that does not consistently produce graduates of acceptable quality is no longer able to provide ECEC training***
- ***externally validate the competencies of a targeted sample of VET graduates to ensure graduate quality is maintained***
- ***consider relaxing its focus on ongoing registration in the future, as poor quality training providers are both denied entry and progressively removed in the short-to-medium term.***
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DRAFT RECOMMENDATION 10.6

The Australian Skills Quality Authority should be subject to a performance audit within its first two years of operation. This performance audit should:

- ***focus on the ability of the Australian Skills Quality Authority to ensure that ECEC workers receive quality vocational education and training***
- ***review the effectiveness of the Australian Skills Quality Authority in enforcing the minimum conditions and standards for initial and ongoing registration***
- ***consider the adequacy of the funding allocated to the Australian Skills Quality Authority.***

DRAFT RECOMMENDATION 10.7

ECEC qualifications should be regarded as ‘high risk’ by the Australian Skills Quality Authority and audited accordingly. Organisations found to consistently provide high-quality ECEC training should be subject to progressively less regulatory intervention over time.

We applaud any robust accountability requirements. This must be developed in consultation with universities and teacher registration bodies. If pathways for career development are to be simplified, and policies and processes developed for the training, the sector should take further study and career ladder needs into account. In NSW for example, the current involvement of the NSW Institute of Teachers in early childhood teacher education programs mandates particular requirements that must be considered for professionals considering career and qualification advancement.

DRAFT RECOMMENDATION 10.8

Governments should ensure that all workers in ECEC services have access to professional development and support programs. Priority should be given to enabling workers to participate in professional development that will assist them to:

- ***implement the National Quality Standard and the Early Years Learning Framework***

- *include children with disabilities and children from culturally and linguistically diverse backgrounds in ECEC services*
- *enhance the leadership and governance of ECEC services*
- *work effectively in integrated ECD services.*

We recommend that the points above be used to develop guidelines for the approval of degree programs that allow three year qualified teachers to upgrade to 4 year degree level (Bachelor or Master).

DRAFT RECOMMENDATION 10.9

While there is no case for excluding teachers working in ECEC settings from existing teacher registration requirements in all jurisdictions, governments should not endorse or contribute funding to a registration scheme for non-teacher ECEC workers.

We endorse this point and seek its strengthening. Early Childhood teachers are not always recognised in “teacher registration” schemes such as the NSW Institute of Teachers. **ALL** teachers should have the opportunity for accreditation and registration with an associated institute regardless of the sector in which they work.

Chapter 11 Planning the ECEC workforce

DRAFT RECOMMENDATION 11.1

The Early Childhood Development Working Group should ensure that the Early Years Development Workforce Strategy:

- *contains clearly identified objectives*
- *uses sound data on the current workforce and clear, robust assumptions about future policies to make projections of expected ECEC workforce demand and supply*
- *employs the most cost-effective policy instrument (that also takes into account non-financial factors) to address supply limitations*
- *takes into account both direct and community-wide effects in assessing cost effectiveness.*

We endorse this recommendation and further seek the inclusion of another dot point to ensure that the Workforce Strategy draws on current national and international **research** that studies the role and work of early childhood educators and the benefits that qualified teachers bring, as pedagogical leaders, to children’s learning and development.

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Chair – Early Childhood Programs**

Signed on behalf of Dr Zsuzsa Millei, Dr Jo Ailwood, Ms Vicki Parkes, Dr Scott Eacott, Dr Margot Ford, Ms Nicole Leggett, Ms Katrina Martucci 30/8/11