

PLAY ENVIRONMENT
CONSULTING
PRUE WALSH

**Senate Education, Employment and Workplace Committee
SENATE INQUIRY INTO THE PROVISION OF CHILDCARE
Hearing 15th July 2009**

Appendices to Submission from Prue Walsh
Play Environment Consulting Pty Ltd©

Med(ECE); BEdSt; DipT(ECE), Prue Walsh Dept(ECE); Churchill Fellowship & Carmel Burns AO; PhD; MPhty.

- Submission re: Early Childhood Services for discussion with representatives of Queensland Government – 2 April 2008 & presented at the COAG Forum - 21 August 2008

5. A National Quality Framework for Early Childhood Education and Care

- Submission from Play Environment Consulting —Prue Walsh, 15 September 2008

6. Supplementary Material

- Childcare Staff Concerns
- Director of Childhood Centre concerns regarding the provision of childcare

CHILD CARE LEGISLATION - THE PHYSICAL ENVIRONMENT OF
CHILD CARE CENTRES

A SPEECH BY SANTO SANTORO MLA,
MEMBER FOR CLAYFIELD AND DEPUTY LIBERAL LEADER
SHADOW MINISTER FOR EMPLOYMENT, TRAINING & INDUSTRIAL RELATIONS
DELIVERED IN THE QUEENSLAND PARLIAMENT ON 18 OCTOBER, 1994
DURING THE
MATTERS OF PUBLIC IMPORTANCE DEBATE

Mr Speaker, I wish today to address an issue of growing importance and concern within our community - this being the quality of the physical environment of childcare centres and the impact of this environment on the welfare and development of young children.

Members on both sides would appreciate and agree that the major changes that have been occurring in Australian society have markedly changed the pattern of childhood and family life.

With the marked participation of women in the work force, there has been a dramatic increase in demand for places in childcare centres so that children under 6 years of age can be cared for while both parents are working.

As a result, young children within our community are now spending 12,000 hours in their most formative years of their life in childcare. Research has indicated that this is not detrimental to the child on one proviso, and that is the provision of quality childcare. Internationally, this is recognised in the United Nations Declaration of Children's Rights. One of the key points of this declaration is Article 31 which speak of children's right to play.

The physical environment which covers the location, neighbourhood, allocation of space, design of building and in particular provision of outdoor playground space obviously impacts on the child's right of quality play.

Mr Speaker, when it comes to the physical playground, environment experts across Australia and here in Queensland consider that the Childcare Act of 1991 is deficient.

The intent of the Goss Government when writing the Childcare Act was to -

"Enhance the number, range and quality of childcare services provided in Queensland and increase the capacity of childcare services to respond to a variety of needs, including those of Aboriginal and Torres Strait Islander families from diverse cultural backgrounds and children with disabilities".

What has been happening in practice has fallen far short of this lofty goal and is now an issue of national concern.

What appears to have been forgotten in this instance is that for legislation to be truly effective, it must be based on a concrete knowledge rather than ad hoc

**Material collated and prepared by Prue Walsh
Play Environment Consulting**

Of particular concern is that many of these centres are being built in newly developing urban spaces, condemning children to ghetto space well into the twenty-first century. In a society that is being increasingly urbanised, space is going to become harder to obtain. This is a lamentable practice which is failing to recognise children's needs.

One Council, Logan City Council, has taken the pro-active stance for amending its town planning ordinances to counter-balance these development trends which have lost sight of the major provision of childcare, that of quality care for young children in an attempt to curtail the proliferation of what could only be called kid ghettos and baby factories.

The failure of the Goss government to effectively research and deal with the issue needs to be challenged and the legislation immediately placed under review bringing in elements of accountability so that children's needs are effectively cared for within the community.

The Australian Early Childhood Teachers Association in Queensland recommends that expert opinion and input be sought for any future debate on regulations and appropriate design of centres (including playgrounds) from those with specialised knowledge in the design and quality of early childhood care and educational environments. Only then can the Goss Government's representatives adequately speak on behalf of the professional early childhood field and future national legislation.

The Office of Child Care has had a half-hearted attempt at rectifying this situation and produced in-house a document called Design Considerations for Childcare Centres, a document which in effect has failed to define critical issues needed to counter-balance the shortfalls in the legislation.

While the Goss Government has sought public consultation, it is notable that they have asked people who are broadly based within the field and then had the information assessed by people who are not fully trained to cover these areas, making a mockery of the consultation process.

It is time for the Goss Government's Department of childcare to realise that they do not have the expertise within their ranks to counter-balance the situation.

It is time that the parents of Queensland realise that whilst Federal government intents towards looking after their children have been well founded, the effective use of the money towards ensuring quality care for children has been restricted and misused due to the shortfalls in the Queensland legislation. It's time for a review of the legislation and the sooner this occurs the better it will be for the young people of the State.

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Santo Santoro MLA

B.A., B.Econ (Hons)

Member for Clayfield Deputy Liberal Leader
Shadow Minister for Employment, Training & Industrial Relations.

MEDIA RELEASE

CHILDREN IN MANY CHILDCARE CENTRES TREATED LIKE SARDINES

The lack of sufficient outdoor playground space within childcare centres is having a detrimental impact on the development of young children.

This claim has been made in State Parliament today by Deputy Liberal Leader and Member for Clayfield, Santo Santoro during the Matters of Public Importance Debate.

"Currently the childcare regulations require that an 7m² per child be provided for within childcare centres," Mr Santoro said.

"Yet here in Australia, the Australian Early Childhood Association (AECA) believes that at least 18.5m² per child should be the minimum requirement.

"Coming from the experts this assertion must ring alarm bells in the minds of childcare providers and, of course, the Government."

Mr Santoro told Parliament that research has repeatedly indicated that a lack of space is a major cause of stress in children and staff at childcare centres and leads to a breakdown in children's behaviour and antisocial behaviour.

"Children's needs to interact with the physical environment is considered an essential element of a child's balanced development," Mr Santoro said.

Mr Santoro also criticised the location of many childcare centres.

"We have now entered the era of poorly designed childcare centres and hard to supervise playgrounds on three sides of the building with inaccessible land cited on major urban thoroughfares," Mr Santoro said.

"So we now have children in tight spaces with noise and air pollution of stop and start traffic constantly in the background.

.../2



**Senate
Employment, Education and Training
References Committee**

childhood matters

**The report on the inquiry
into early childhood education**

July 1996

THE PHYSICAL ENVIRONMENT

A further factor determining the quality of early childhood services is the physical environment although its importance is often overlooked. Mrs Walsh, a play environment consultant and Chairperson for the Australian Early Childhood Task Force on Physical Environments in Early Childhood Settings, outlined for the Committee, in some detail, issues relating to the physical environment.

One of the main concerns relates to the amount and allocation of space. Mrs Walsh described a number of situations to convince the Committee that in many situations the prescribed amount of space and the manner of its allocation simply do not work. Poorly researched legislation and inadequacies in national standards combine to result in numbers of incorrectly sited, poorly designed buildings and playgrounds that 'are proving totally inadequate in most areas'.⁸⁷

The physical environment is mainly a matter of State and Territory and local government regulations. Requirements are currently based on an allocation of space per child. The amount allocated seems in some cases to be well below what it should be, although it should be noted, as with

⁸⁷ *Transcript of Evidence*, p. 353, Brisbane.

Childhood Matters: The Report of the Inquiry into Early Childhood Education

most aspects of early childhood education covered in this report so far, that there are wide discrepancies in regulations and monitoring of compliance with regulations. Particularly critical is the provision of outdoor space. For children over 2 years of age, space requirements vary per child from 6.96 square metres in New South Wales to 18 square metres in the Northern Territory.⁸⁸

These figures are not calculated in conjunction with a range of other factors, such as reference to group size, number of intended users, climactic considerations and other planning factors. The allocations, in sum, 'do not take into account the need for an overall base figure, plus so much for each child'.⁸⁹ Neither are there any specific requirements 'as to the quality of that play space, so it is possible to build on a site with one steeply-sloping corner and call that "outdoor play area" on the plan', or have centres where 'the playground space for the toddlers and babies is where all the car fumes are'.⁹⁰

The impact of poor space provision is felt by both the children in the centres and the adults working in them—increased stress for adults working in centres and consequent high levels of staff turnover, and 'delayed development, increased level of aggression, anti-social and aggressive behaviour amongst children'.⁹¹

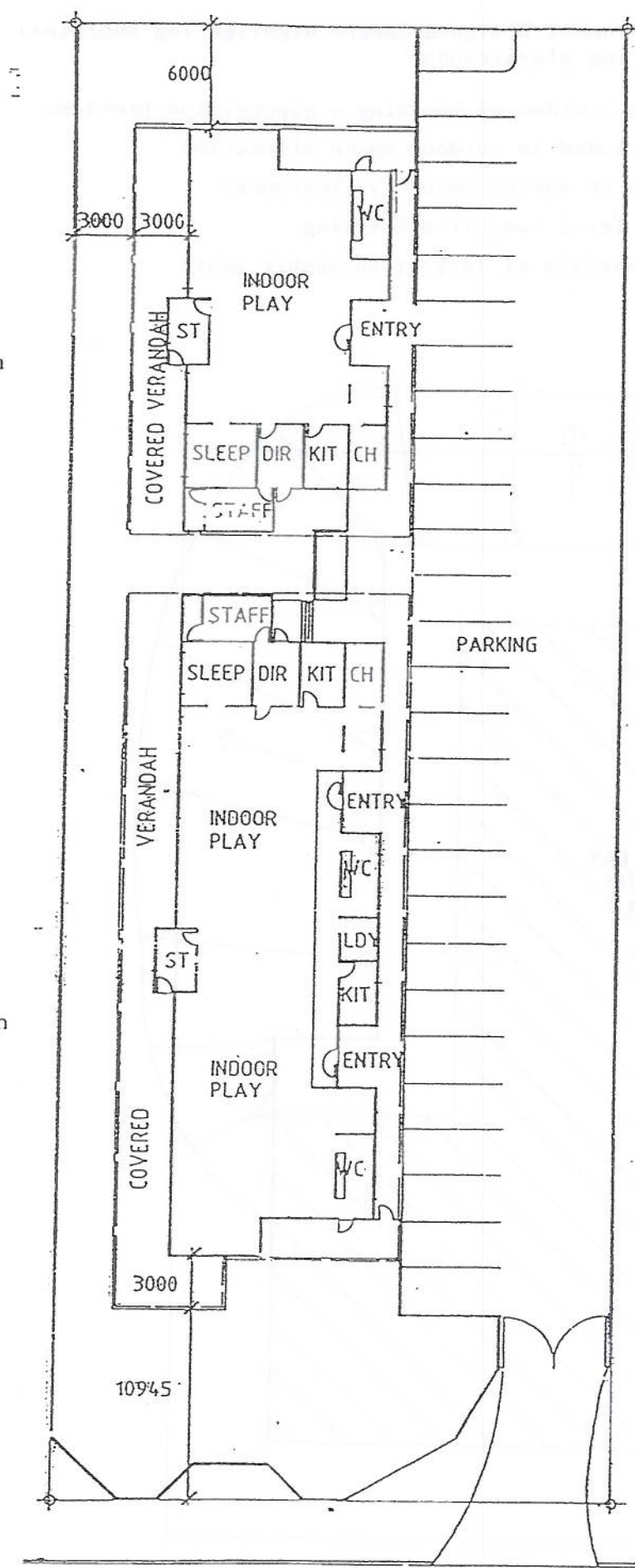
According to Ms Walsh, efforts by States and Territories to improve the quality of the physical environment through legislation and regulations has been 'largely ineffective'. Much of the problem stems from a situation where 'the information provided to governments was collated and interpreted by public servants with training in other disciplines. They lacked not only specific early childhood training but the specialised expertise to understand fully how particular physical setting[s] can support [an] effective early childhood teaching program, or militate against it'.⁹²

- 88 Submission no. 68, vol.4, p. 62 (Ms Walsh).
89 Submission no. 68, vol.4, p. 47.
90 Submission no. 68, vol.4, p. 49; *Transcript of Evidence*, p.355, Brisbane (Mrs Walsh).
91 Submission no. 68, vol.4, p. 40.
92 Submission no.68, vol. 4, p. 49.

Despite the number of guidelines from different levels of government covering childcare services, none of them 'provide definitive statements on the core issue of space'. The existence of varying guidelines and differences in State and Territory regulations may also impede progress towards a better physical environment. The Committee considers that in view of the numerous problems relating to the physical environment, the national standards for early childhood settings should be reviewed in order to take into account the optimum physical environment, both indoor and outdoor, for young children in care and education.

The Committee recommends that the Minister for Health and Family Services ensure that the National Standards for Centre Based Long Day Care include a specific requirement relating to the allocation of space, and other relevant aspects of the physical environment, both indoor and outdoor, in which early childhood programs are conducted. Specialist consultant expertise and the Australian Early Childhood Association should be involved in the development of these physical environment standards.

Recommendation 17



45 children

75 children

=

Total

120 children

6 weeks to
5+ years

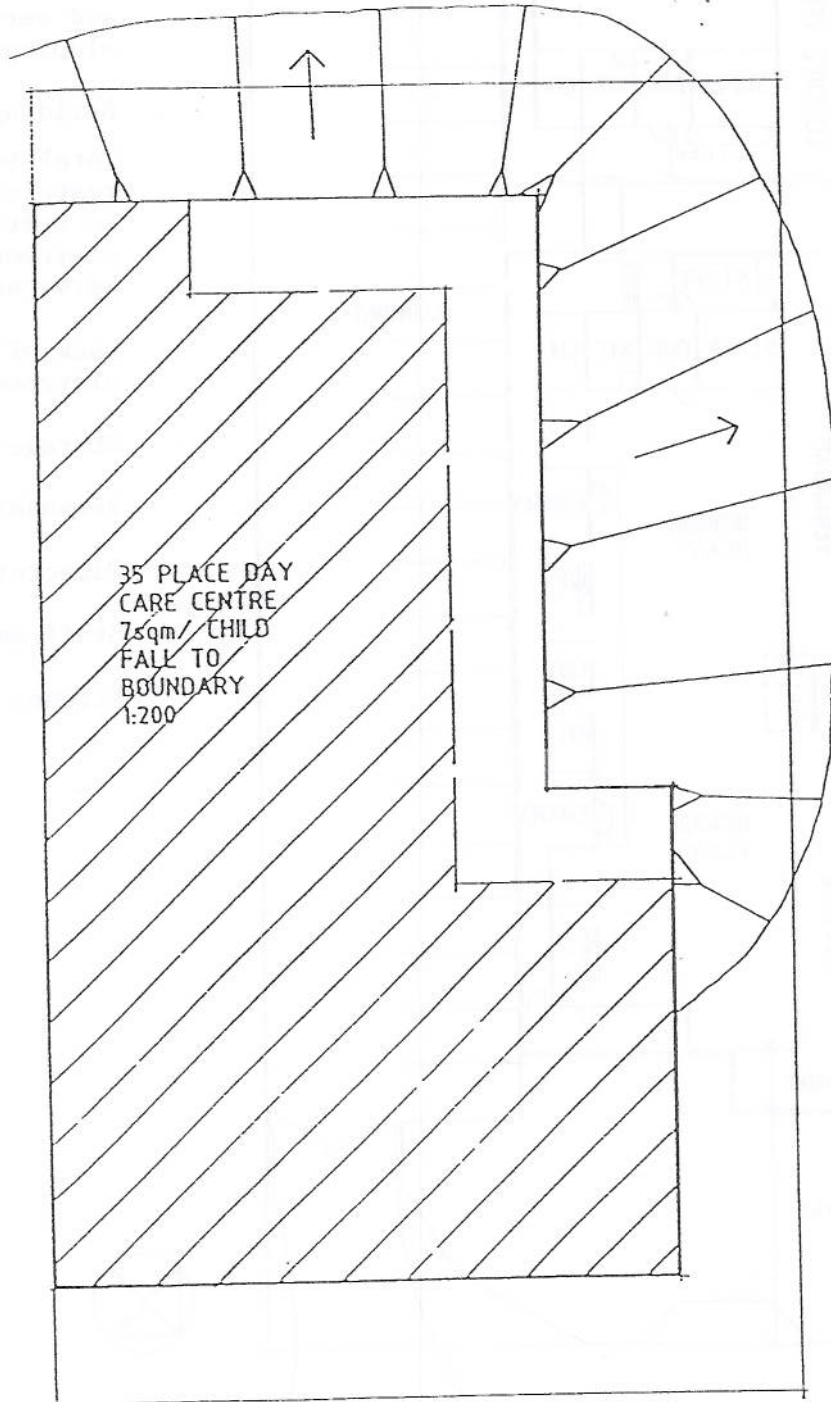
"KID GHETTO BABY FACTORY"

Private Day Care Centre
which complies with
current Queensland
legislation.

- . Tight site
- . Playground incorporating boundary clearances and verandahs on sloping site
- . Building
 - Total building size restricted resulting in restriction to playrooms and back up services
 - Lack of separate playrooms
 - Storage
 - Verandah space
 - Director's office
 - Staff amenities
 - Kitchen

Standard NSW Government Designed Centre highlighting shortfall in legislation covering playgrounds.

- . Playground on 3 sides of building = supervision problems
- . Verandahs included in outdoor space allocation
- . Incorporation of narrow boundary clearances
- . 1.5m drop in level away from building
- . Playground consists of largely unuseable space



NEGATIVE

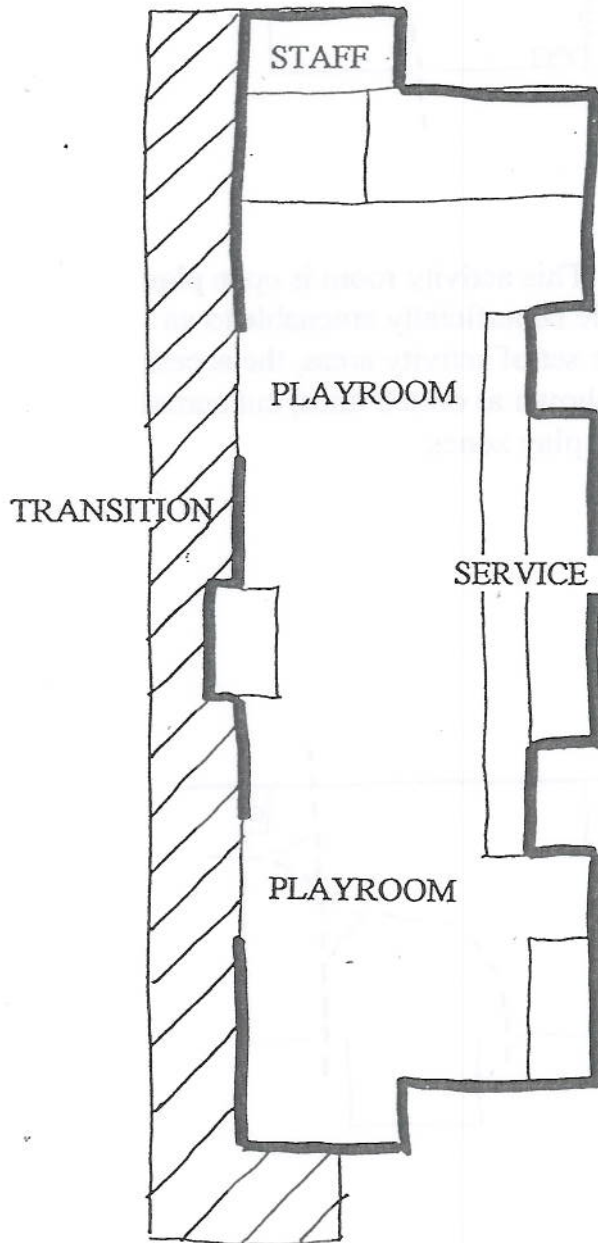
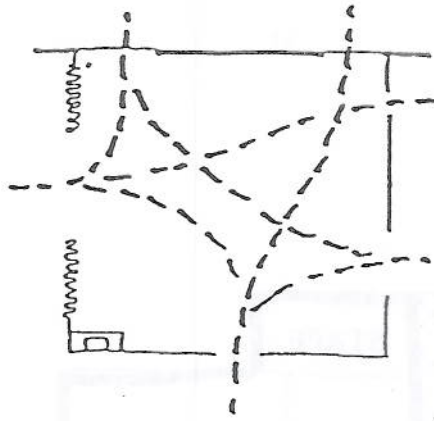


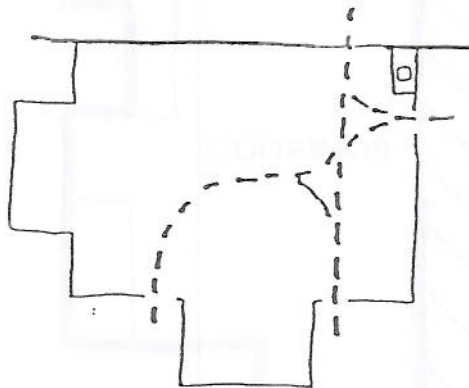
Figure 3.3 Ineffective building planning

Notes: This illustrates a number of design faults, in particular: lack of clearly defined playroom, insufficient storage space, access to services via playroom, narrow ineffective verandah and very restricted administration and staff areas. Supervision is easy, but creation of activity zones is very difficult.

Examples of internal access planning

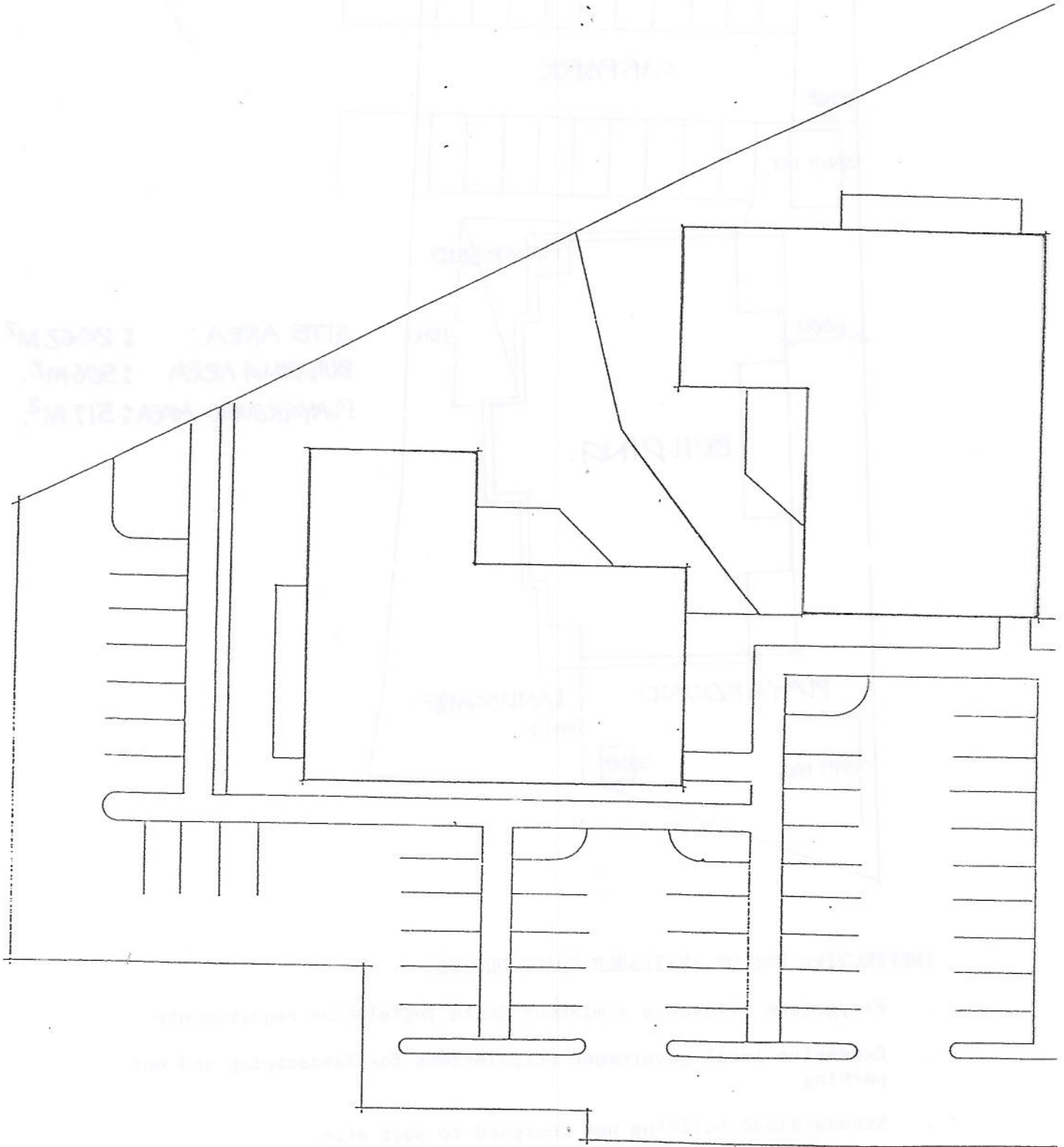


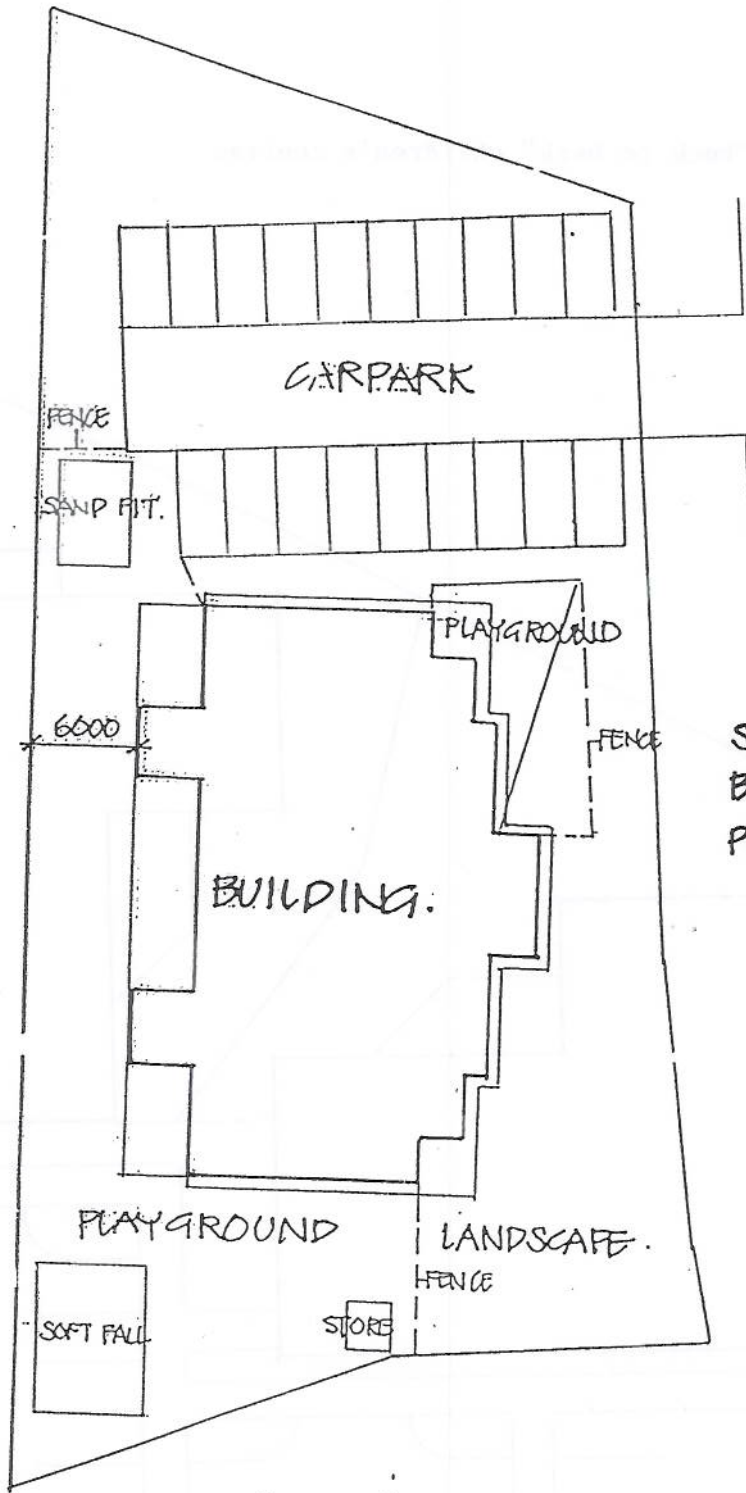
Wrong: This activity room is open plan and while superficially amenable to an adequate set of activity areas, the access routes (shown as dotted lines) cut across potential play zones.



Correct: This allows uninterrupted pockets of space in which to set up activities.

2 x 75 children "back to back" children's centres

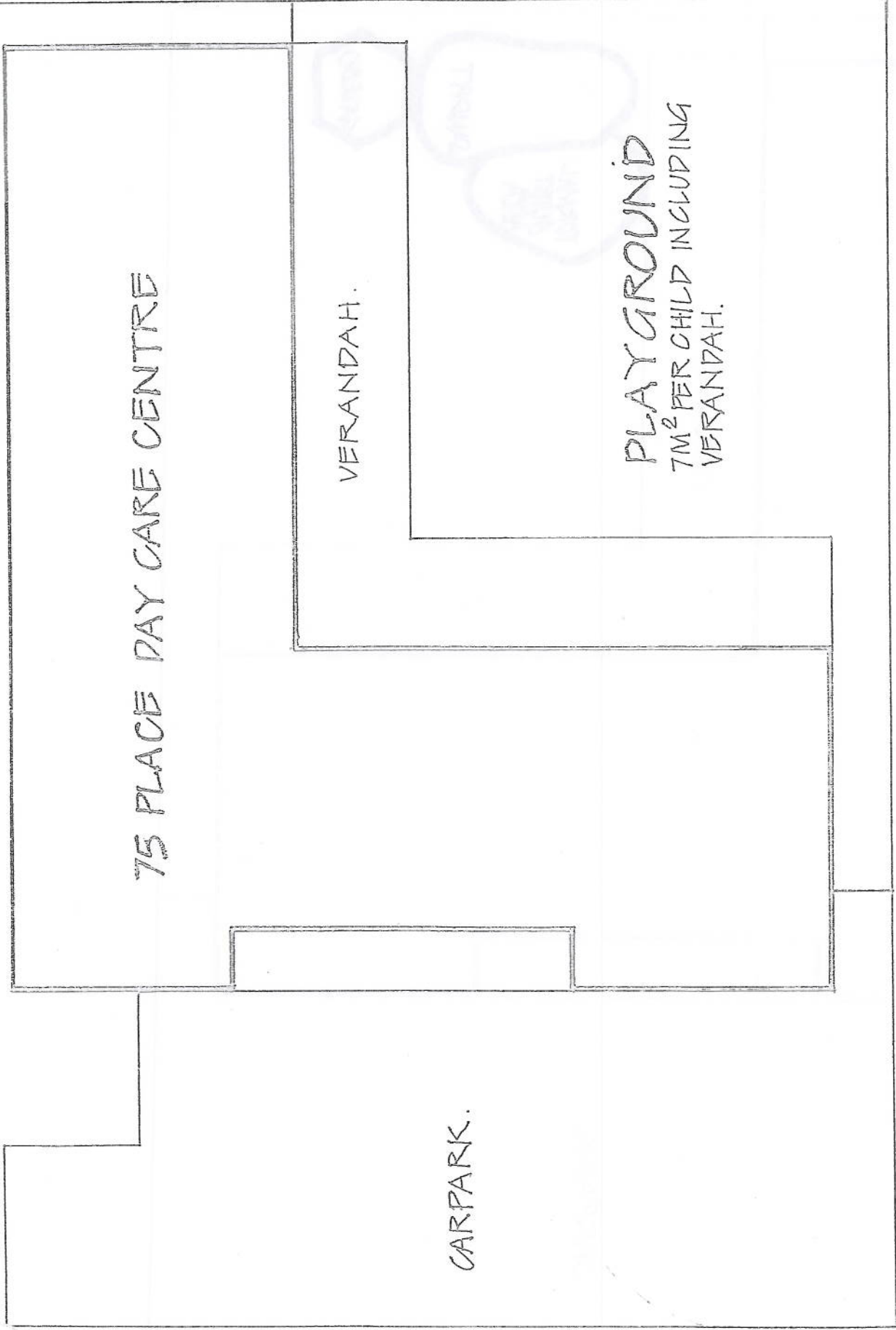




SITE AREA : : 2462M²
BUILDING AREA : : 506M²
PLAYGROUND AREA : : 517M²

INEFFECTIVE USE OF AVAILABLE SPACE DUE TO:

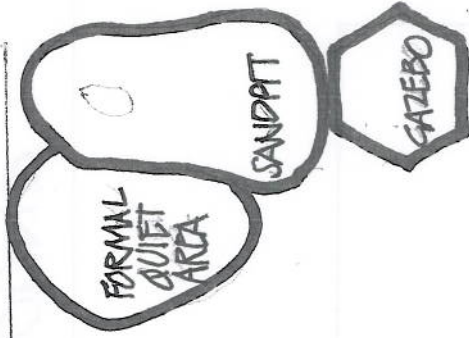
- Playground allowance = minimum State legislation requirements
- Excessive local government stipulations for landscaping and car parking
- Standardised building not designed to suit site



Playgrounds – Minimum licencing requirements for spatial provision is ineffective in practice and does not allow for basic play items to be included, as it does not take perceive the variety, diversity, number or safety dimensions required. The following sequence of drawings indicates the shortfall.

75 PLACE DAY CARE CENTRE

VERANDAH

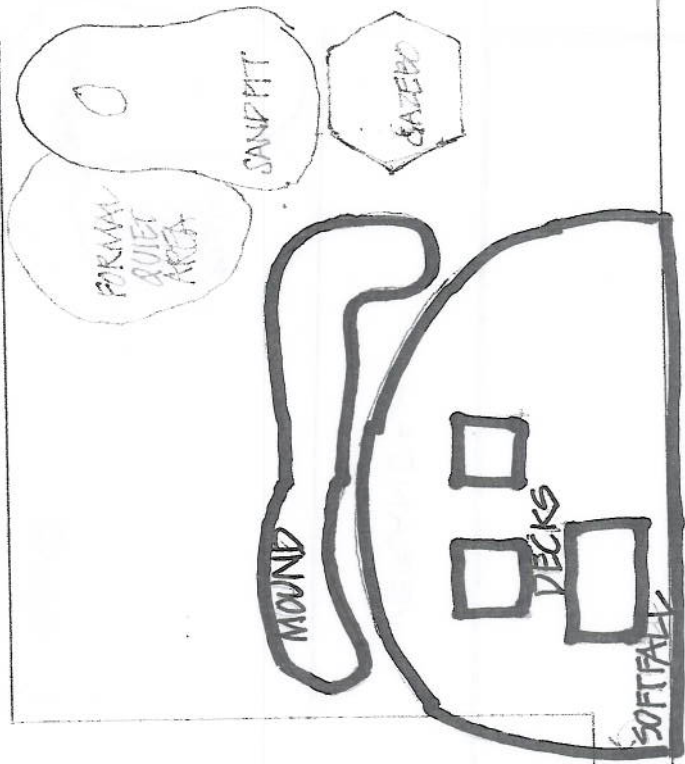


CARPARK.

75 PLACE DAY CARE CENTRE

VERANDAH

CARPARK

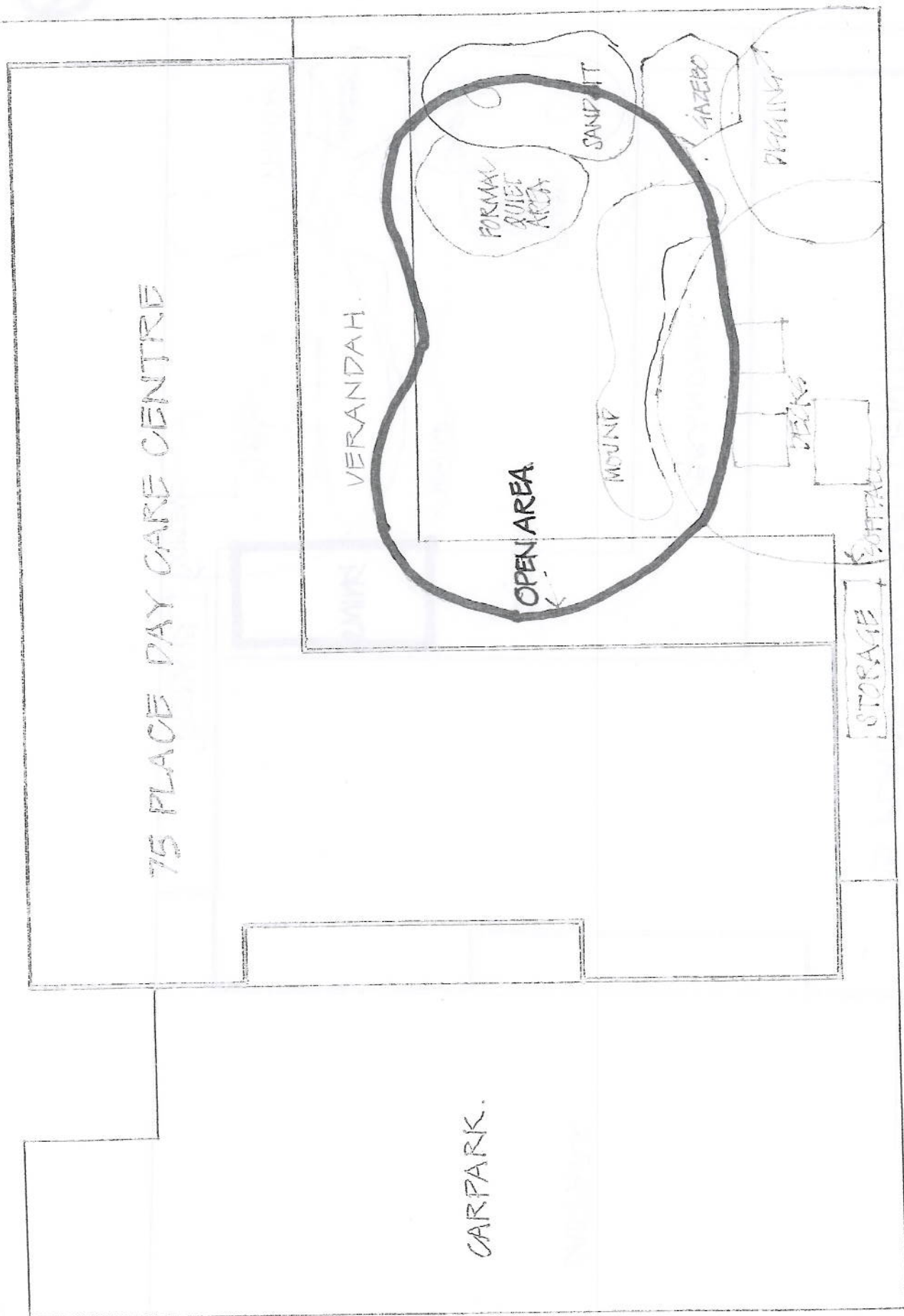


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4.

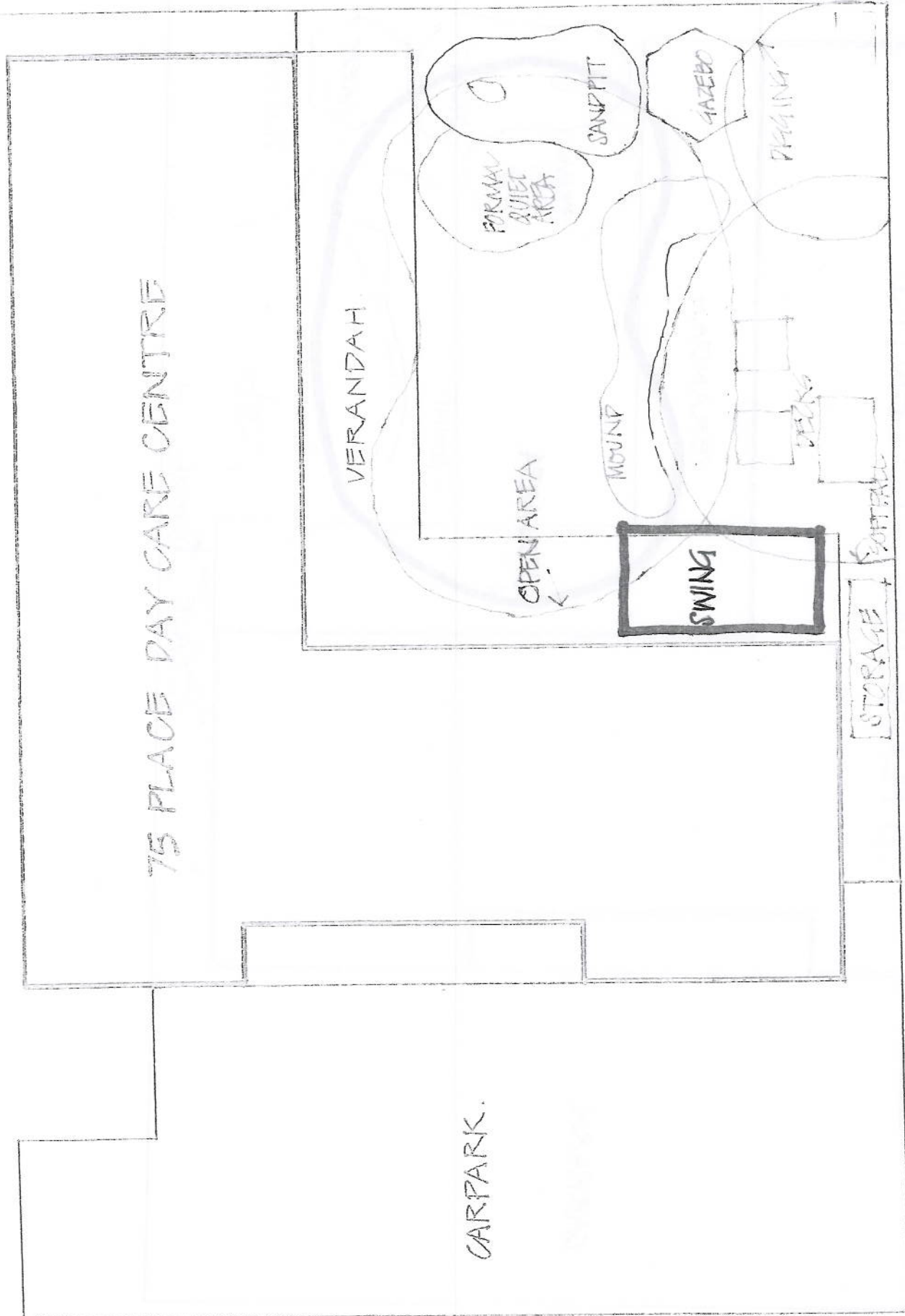
75 PLACE DAY CARE CENTRE



2

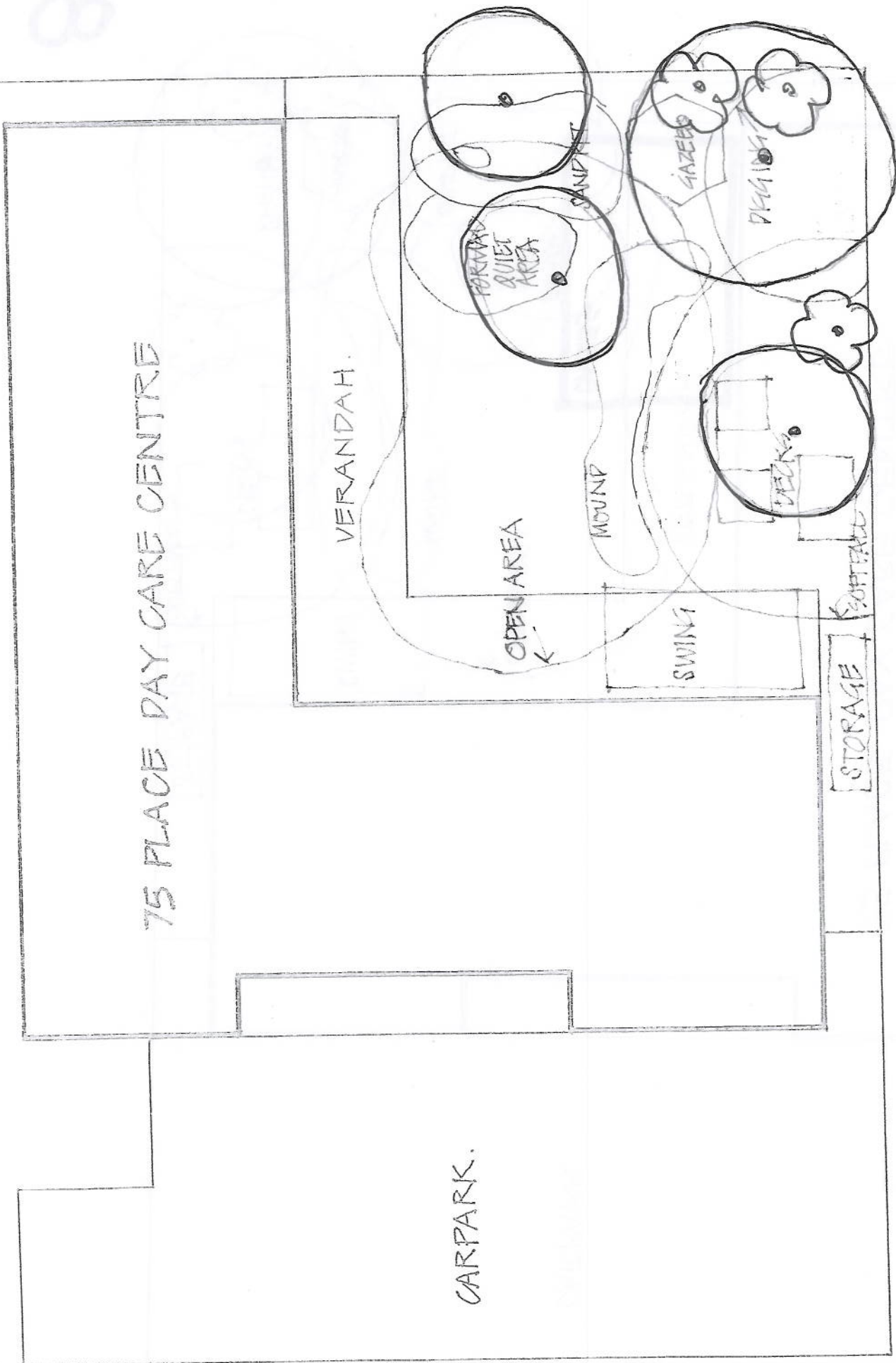
75 PLACE DAY CARE CENTRE

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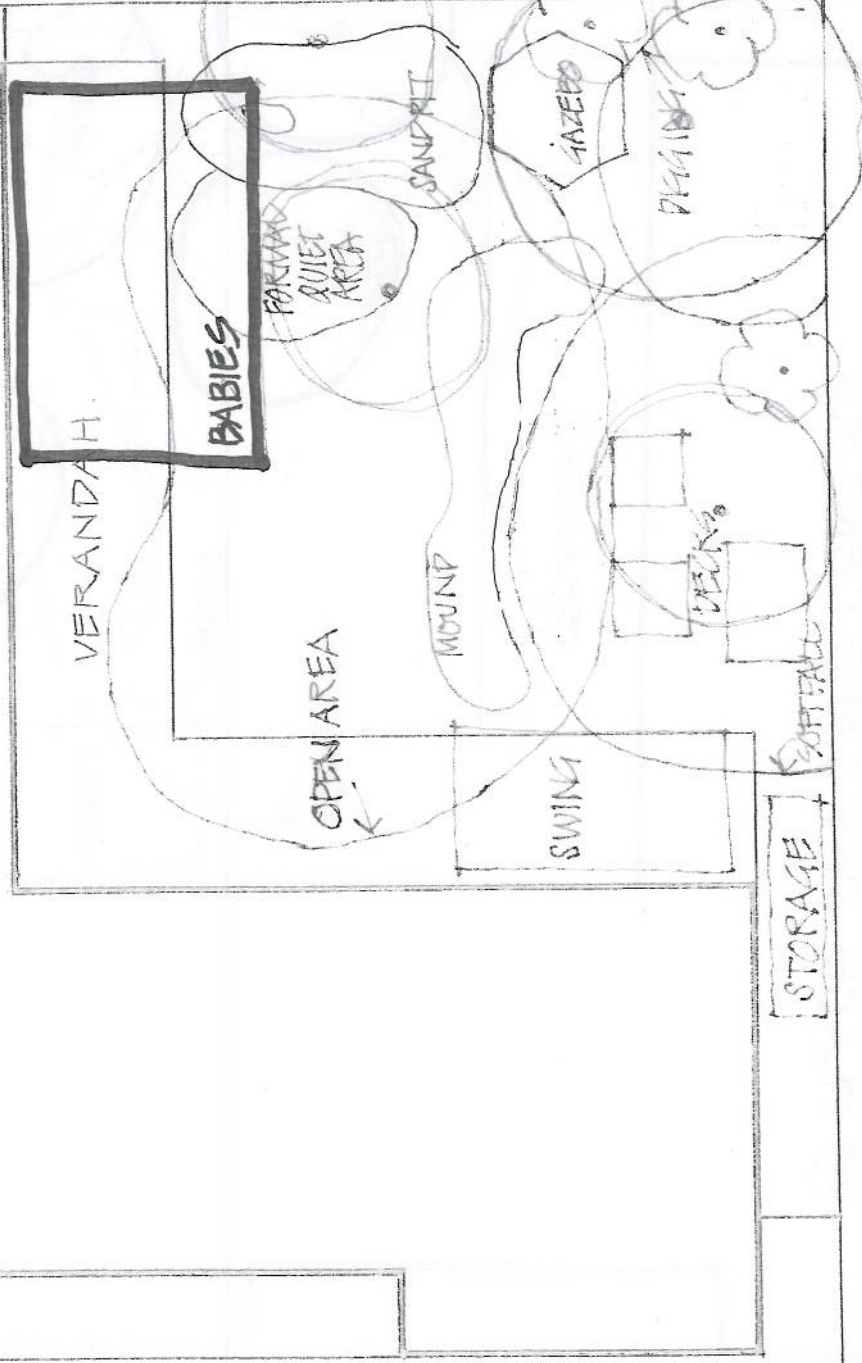
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75 PLACE DAY CARE CENTRE



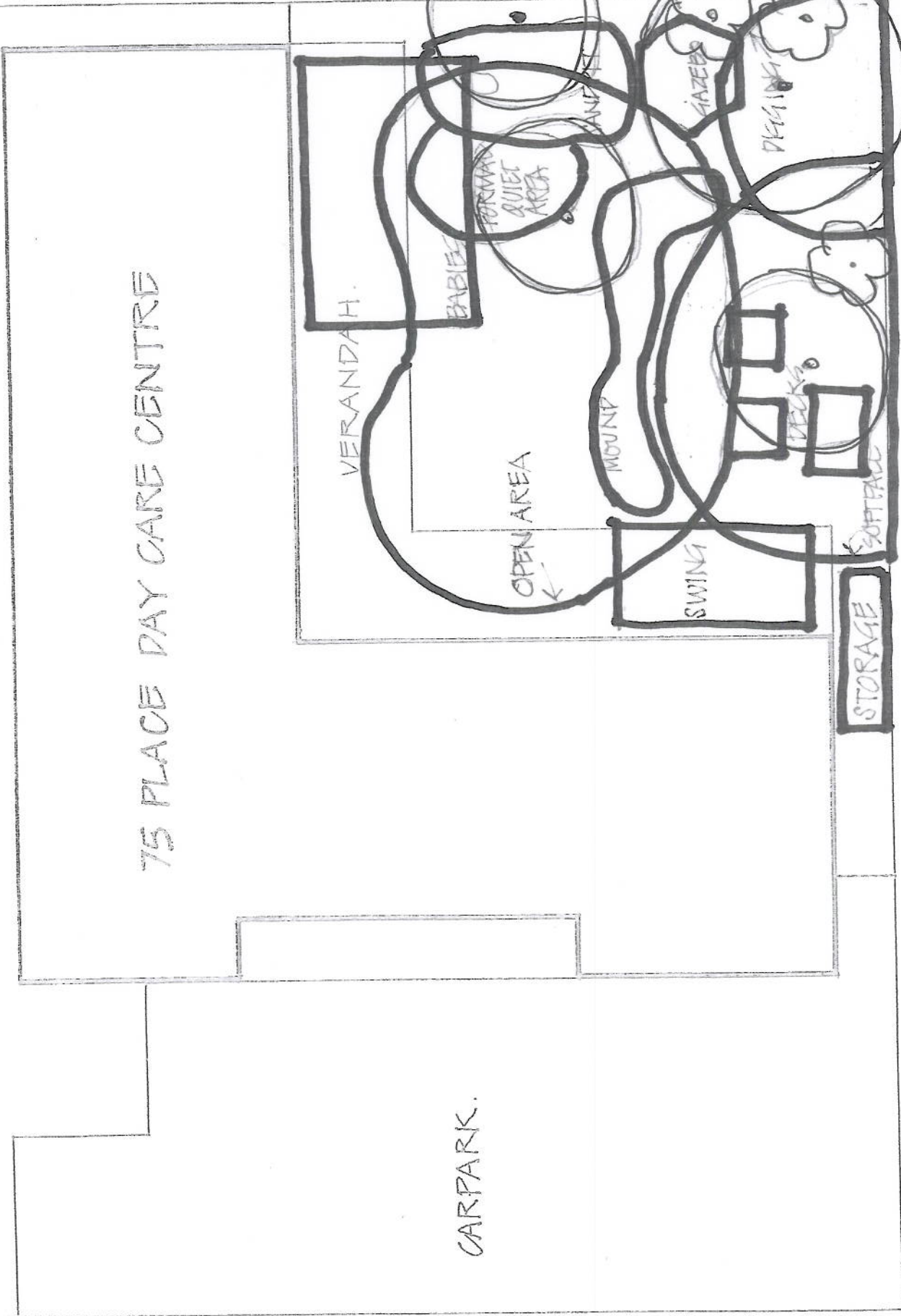
75 PLACE DAY CARE CENTRE

CARPARK.



75 PLACE DAY CARE CENTRE

CARPARK.



PARLIAMENT OF NEW SOUTH WALES



Committee on Children and Young People

Report No. 8/53 • October 2006

**INQUIRY INTO CHILDREN, YOUNG PEOPLE
AND THE BUILT ENVIRONMENT**



List of Recommendations

The seminars should aim to meet the needs of an inter-disciplinary audience, but also cater directly for the various disciplines within the built environment (for example, representatives from local government; planners; architects and the development industry).

The NSW Commission of Children and Young People promote the TAKING PARTicipation Seriously Kit to the built environment professions, including in preparation for the seminar series, and that the Young Visions Toolkit project by NAPCAN and Streetwise Communications also be considered as a potential resource for built environment professionals.

Recommendation 3

The NSW Commission for Children and Young People consider coordinating and promoting the following projects or initiatives identified by the Committee as a result of its inquiry, utilising the mechanism of the Steering Committee where consultation and negotiation is necessary in respect of each project or initiative:

Design, planning and consultation

- (a) involve the NSW Centre for Overweight and Obesity on relevant inter-agency forums, whereby the expertise gained by the Centre will inform developments associated with creating child- and youth-friendly environments. (p.34)
- (b) request the Minister for Planning consider a review by the Department of Planning of the effectiveness of the *Urban Design Guidelines with Young People in Mind* and, pending the outcome of a review, that the currency of the publication be enhanced and the publication be re-launched. (p.41)
- (c) consult with the Minister for Planning on the need for the Department of Planning to review and update the Department's *Child-friendly Environments* publication, which was re-issued in 1999 (although substantive elements of the document were first written for a 1981 publication). (p.61)
- (d) consult with the Growth Centres Commission about the possibilities for taking the needs of children and young people into account in the development of Sydney's new growth areas. (p.59)
- (e) explore opportunities to develop indicators of a 'child-friendly' community, which could be incorporated into the Department of Planning's tools for assessing land use plans. (p.51)
- (f) consult with the Royal Australian Institute of Architects and the Planning Institute of Australia on the production of a new publication to promote children and young people's participation in the development of their environments. (p.58)
- (g) consult with the Minister for Education about considering a review by the NSW Department of Education of policies associated with the utilisation of school sporting and recreational facilities after school hours and the impact of these policies on children and young people. (p.37)

Early childhood and physical environments

- (h) undertake research into the factors that determine or contribute to positive play and recreational spaces for children and young people, and the economic costs and benefits of providing such spaces. (p.35)
- (i) consult with the Minister for Community Services on the need for the Department of Community Services to review the adequacy of the *Children's*

- Services Regulation 2004* and current design guidelines issued by the Department of Community Services, including the 'Best Practice Guidelines for Early Childhood and Physical Environments'. (p.31)
- (j) Consult with Minister for Local Government about gathering together examples of good playground and recreational developments for dissemination to all councils. (p.19)

Housing

- (k) review the adequacy of current building standards in relation to noise insulation and assess the trend towards child-free housing developments. (p.24)
- (l) review the progress of the Department of Housing's Young People's Housing Access Strategy. (p.26)
- (m) monitor the consequences of recent housing policies on children and young people across New South Wales. (p.26)

Education

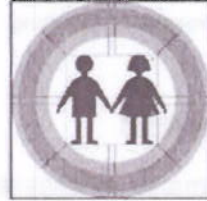
- (n) consult with the Royal Australian Institute of Architects, Planning Institute of Australia and the Property Council of Australia on the feasibility of establishing specific awards for developments reflecting the principles of child and youth-friendly environments. (p.63)
- (o) investigate with universities offering architecture and planning degrees the inclusion of a curriculum component or module on how to involve children and young people in planning. (p.63)
- (p) review documentation and multi-media kits produced by the Commission for Architecture and the Built Environment (CABE) (London, England) in relation to children, young people and the built environment and consider their relevance for curriculum development in New South Wales. (p.61)
- (q) Promote the outcomes of the project associated with security guard training, in consultation with the Commission for Community Relations. (p.41)

Monitoring

- (r) investigate the development of a set of indicators to be utilised by the Commissioner for Children and Young People to demonstrate the impact of the built environment on children and young people in NSW over time. (p.60)

Recommendation 4 (p.51)

The NSW Commission for Children and Young People explore the possibility of partnering with a local council to investigate how local government can harness its capacity to create more child-friendly environments. This partnership should include consideration of development of DCPs on children's services, availability of fast food outlets and provision of playgrounds, parks and other recreational facilities. Attention to the engagement of children and young people in master planning and reviewing relevant development applications should also be considered.



PLAY ENVIRONMENT
CONSULTING
PRUE WALSH

**SUBMISSION
BY
PLAY ENVIRONMENT CONSULTING
TO
PARLIAMENT OF NEW SOUTH WALES
INQUIRY INTO CHILDREN, YOUNG PEOPLE
AND THE BUILT ENVIRONMENT
October 2005**

1. Focus of submission

This submission primarily addresses two of the Inquiry's terms of reference:

- (i) *trends, changes and issues for children and young people in the development, implementation and co-ordination of policy, design and planning for the built environment;*
- (ii) *strategies to ensure that built environment issues affecting children and young people are readily identified and receive coordinated attention across portfolios and different levels of government;*

The factual basis of this submission relates to the built environment of younger children (0–8 years), and is based on detailed consideration to the implications to the development of overall competency skills in children, which will affect the rest of their lives. It is stressed that it is adults alone who make 95% of the decisions which impact upon young children; the level of expertise is, to say the least, uneven across the decision-maker spectrum.

2. Interaction of Government instruments and quality of built environments

While well intentioned, it is common for Government instruments to be well behind the changes in society. This is associated not only with the time lags in gaining broad acceptance across portfolios, but also with the departmental reliance on in-house expertise. If regulatory instruments are supported by more easily updated guidelines or publication of precedents/examples, then a more effective array of information will be available to the society. The table below sets out some of these.

Government instruments	Supplementary information
<p><u>Formal</u> Legislation, accreditation Development control plans</p>	<p>Best Practice guidelines, court precedents (eg Burwood DCP); research</p>
<p><u>Informal</u> Policies, coordination</p>	<p>Societal changes in demand (eg. childcare), changes in lifestyle (eg. obesity), and narrow interest groups (eg. Kidsafe)</p>

If the supplementary information is to be effective, it needs to be disseminated and supported (even funded) by Government. Without supplementary information the Government will never meet societal needs in a timely fashion.

Case study : Burwood DCP

In 1999, Burwood Council took legal action under its DCP to prevent a substandard childcare facility from going ahead. It complied with regulations. However, on evidence based on Best Practice¹, the QC for the developers withdrew the defence 24 hours before it came to court. When Local Councils know their rights, then quality results; but network dissemination is vital to this.

¹ Walsh PA (1996). Best Practice Guidelines in Early Childhood Physical Environments. NSW Department of Community Services. ISBN 0 7310 4243 3.

3. Impact of Physical settings on quality of play in built environments

While Governments are drawn to “one size fits all” instruments (as being “fair to all”), this tends to foster a checklist (or “black letter”) approach. While the black letter approach is common in the USA (reinforced by litigation), the Australian body of law rests on in principle or intent. Governments need to be wary of Prescriptive Regulation, as for example that of safety in playgrounds [AS4585:2004]:

Safety Standards consider	Standards do not consider
<ul style="list-style-type: none"> • materials • engineering strengths • design (like spaces, swing arc, fall height) 	<ul style="list-style-type: none"> • how children use a swing assembly on a platform • whether a piece of equipment has any play value or developmental value

Again, this comes back to the need for guidelines to supplement regulation. But these guidelines must be valid in practice, noting that as has been pointed out² adults tend to see physical settings as functional, whereas children see them as locations for play, learning, interaction and stimulation.

Too often well-intentioned regulation is compromised by narrow perspectives (ie. Not interdepartmental and excludes field expertise). Quality of play needs expert design.

Case study: Obesity

There is Government and community concern about growing levels of obesity in children, but this is seen in terms of diet and lack of exercise which are immediate factors. However, it can be asked whether professionals should also look at built environments to see whether an individual has access to an inviting and developmentally appropriate playspace. In designing playgrounds, I continually experience a real lack of understanding about invitational play—and how to build in invitation to participate. “One size fits all” cannot cover inner city, suburban and remote community needs.

² Parliament of NSW, Committee on Childcare and Young People, (2005). Inquiry into Children, Young People and the Build Environment Issue Paper 1 (page 6).

4. Improved approaches

In my 20 years of designing and assisting with the design of facilities for young children, I see field operatives struggling against the current suite of intergovernmental and intra-governmental regulations, policies and often misinformed officials (see Appendix 3³). It is to be hoped that this Inquiry can take on board some suggestions which are driven by the practical problems and unintended consequences of Government actions. Although interrelated, the Committee may wish to consider actions associated with three main fields.

4.1 External expertise

Whilst not questioning government officers as administrators, they are less effective in developing policies across portfolios or in accessing external (specialist) expertise. There is constructive benefit in using external specialists on a get-in get-out basis for:

- (a) policy development (broader base)
- (b) guidelines (Best Practice) for built environments or accreditation
- (c) advising individual facilities (evaluation or design).

A balance between research and practical knowledge will impact on timelines and delivery respectively. Regulation will be better complied with.

4.2 Information to supplement regulation

There is a need for more emphasis on performance based regulation⁴ to be recognised by government. This should be accessed within a multi-media approach.

The role of the internet as a disseminator (as per the British Columbia⁵) should be explored for issues about young children. Networking is a powerful ownership tool. It is also suggested that the Australian Land Care network (and its annual award system) could be considered as a role model for this community/professional interaction approach.

There is no intent to replace legislation although Best Practice can identify how or where updating is needed only to provide information to increase its effectiveness through channelling information.

4.3 Holistic funding for projects

There is a need for Government to recognise that funding of facilities and community centres will be more effective if the built environment is seen as a whole (as opposed to *ad hoc* alterations). An effective community asset is one which is integrated with complementary facilities. For example, a childcare centre as part of a multiservice hub, or public playspaces integrated with whole-of-shire (or town, or suburb, or remote community) planning. However, integrated planning tends to be initially more expensive and more time consuming. In practice I have found that additional support and guidance is needed to steer implementation of the plans and by doing so there is an assurance of better quality finished buildings and product which will be long term viable. Given that DCPs are the responsibility of Local Government, but funding of facilities can be a mix of government/non-government sources, a rethink of appropriate processes, could well deliver quality facilities otherwise unobtainable. It

³ Walsh PA (2004). When the quick fix won't do. *Rattler* 72, summer 2004, p17–20.

⁴ Graham I (2002). Standards referenced in legislation. *The Australian Standards*, March 2002, p4–5.

⁵ Parliament of NSW, Committee on Children and Young People (2005). Inquiry into Children, Young People and the Built Environment Issue Paper 2 (page 5).

5. Conclusion

In making this submission, I am drawing on an unusual breadth of practical experience in the field. The generalisations developed here, can be substantiated by reference to early childhood projects and case studies with which I have personally been involved. I believe that my statements have solid roots in research in the early childhood field and I believe that the children, the staff and the administrators will benefit by the new approaches advocated here.

Appendix.

Walsh (2004) Rattler article.

Submission re:
Early Childhood Services
prepared by

Janet Kan MEd(ECE); BEdSt; DipT(ECE)

Prue Walsh DipT(ECE); Churchill Fellowship

Y Burns AO; PhD; MPhty

for discussion with representatives of

Queensland Government – 2 April 2008

and presented at the

COAG Forum, Brisbane City Hall – 21 August 2008

EARLY CHILDHOOD SERVICES

Submission prepared by:

Janet Kan
Prue Walsh
Yvonne Burns AO

OVERVIEW

March 2008

Objectives:

A multidisciplinary approach to policy and provision of all childhood services to overcome limitations of a compartmental approach to meeting the needs of young children and their families.

1. Background

Compelling research evidence is emerging about the critical importance of the early childhood years in shaping the long term competency of individual children within families and the community.

Evidence abounds to support the importance of early experiences for optimising brain development. There is increasing research evidence to show that developmentally appropriate early childhood experiences facilitate brain development. Developmentally appropriate experiences include early attachment, quality sensory motor experiences and stimulating physical and social environment.

The economic benefits are clearly expressed in the work of Nobel Laureate, James Heckman:

The real question is how to use the available funds wisely. The best evidence supports the policy prescription: invest in the very young.

While this concept has clearly been integrated into Labor Party policy, the disparity between objectives and outcomes can be enormous—due not to lack of goodwill, but to delineation of responsibilities (and therefore perspectives) between Government agencies.

2. Perspective of the parties to this submission

All parties involved in this submission have a single objective: to address and prioritise children's needs within the community.

- Yvonne Burns AO (Developmental/Paediatric Physiotherapist specialising in early intervention)
- Janet Kan (Early Childhood Educator with experience in Indigenous and non-Indigenous communities and early intervention programmes)
- Prue Walsh (Early Childhood Educator specialist in physical environment provision in early childhood services).

The parties have extensive experience in research teaching and practice both nationally and internationally in their respective fields.

During this period we have all seen major changes in policies and practices relating to early childhood services (often in response to research findings) however, too often, in addressing one problem we have created another.

The intent of this submission is to offer our combined knowledge and experience to highlight areas of policy implementation where objectives and intended outcomes are optimised.

3. Breaking down the barriers

The effectiveness of policies and processes relating to early childhood too often suffer from the "Silo Effect" described by Fiona Stanley, whereby policy in one Department is formulated and implemented in isolation from those in other Departments or agencies.

3.1 Multidisciplinary approach

Because early childhood is affected by a multitude of administrative agencies, good intention is vulnerable to promotion of one aspect (eg. nutrition, literacy and numeracy, safety) at the expense of others (eg. physical, social or language skills). Yet their interconnectedness has not been addressed creating a policy-imbalance for children during the most rapid period of their development.

In order to more effectively address the diversity of needs of young children and their families a multi-disciplinary approach is required.

A multidisciplinary team will be able to develop a deeper understanding and perspective of individual issues and their interrelationships in order that the overall needs of young children will be met. "The whole is equal to more than the sum of the parts". In particular, there is a need to draw on the experience of appropriately qualified field experts who can more accurately assess how a prospective policy will work in practice (analogous to the "focus groups" which operate in some fields). It is strongly suggested that core expertise should include developmentally trained early childhood specialists. Such teams may include learning support, early intervention, or guidelines on developmentally-based environments.

3.2 Programs and approaches in early childhood facilities

Ideally, all children would have access to well resourced facilities and effective support programs.

- (i) Overarching principle—all work carried out with children acknowledges individual differences and interests in children and the provision of programmes that can accommodate and facilitate appropriate learning opportunities. “One size does not fit all”.
- (ii) Promotion of learning—the approach to child learning should be developmentally-based as distinct from chronologically aged-based. In this, the prime objectives should be the holistic (overall) development of the young child through the provision of developmentally-appropriate and play-based learning.

To be effective, there must be:

- acknowledgement of the roles of the physical as well as the social environment and the scaffolding which both physical and social environments provide
 - recognition of social skills in terms of family/child, parent/infant bonding and teachers/child support
 - acknowledgement of the role of the physical environment as the third teacher. In Reggio Emilio great emphasis is given to the provision of facilities which assist/support children and promote interaction.
 - access to programs in which all efforts should be made for a high level of early intervention for young children to help minimise the compounding of any developmental shortfalls that may already be apparent, and assist the child in developing skills that will allow them to move in the mainstream. Such programs should acknowledge children who have subtle or mild differences as early as possible, then support them through the provision of early intervention (in movement, communication and function), skilled teaching assessment and support within a physical environment that facilitates this process.
 - Provision of facilities and resources for children with advanced learning skills is also needed.
- (iii) Staffing—there is a critical need for appropriately qualified personnel to support children during the most formative years of their life through the provision of skilled, developmentally-based training. This is more effective when there is a low child/staff ratio; noting that this ratio needs to be very low when children with special needs are present (since only then can there be a high level of engagement with or support for the children).
 - (iv) Teaching practice should scaffold and support child initiated activity. This requires freedom, choice and time coupled with support, empathy, observation and understanding.

understanding the space needed or again, heavy reliance on commercial-sector equipment design, layout of a building etc. rarely focuses on the children's needs.

Information which does not involve public and other stakeholder consultation tends to be top-down. This carried with it a built-in barrier to user-acceptance/ownership. The product needs to meet the user's needs (not "general" concepts).

Key problem: Research projects are needed to provide the in-depth understanding of causes and effects. Guidelines based in early childhood specialist fields should not be simplified by in-house generalists. Consult widely.

6. Coherence and interdisciplinary inputs

Many projects have a tokenistic approach to multi-discipline input. A building designed by an architect will be structurally sound, but if they do not understand how it will foster or retard a child's independence, then is this a good outcome? The same applies to the outside learning environment: a landscape architect will create a pleasing area, but they are unlikely to know the factors which contribute to a child's developmentally-based flow of play options.

Key problem: Projects need to incorporate a multi-disciplinary input at the very earliest stage (site assessment).

Early Childhood Services - Children with mild deficits in Prep .

Following our recent discussion I have prepared this brief paper to highlight the points made in regard to early childhood services for children with mild problems in the prep year.

A conservative estimate of 10-15% of all children entering the prep year will have a mild or minor functional deficit of movement, co-ordination, communication or function. In addition there are a number of children whose development is immature in structure and function due to extreme prematurity, environmental constraints or family factors. This estimate does not include children who have a mild impairment due to a diagnosed condition and does not include children with a moderate or severe disability.

Research has shown a close link between motor co-ordination problems and learning as well as a link between mild movement problems, poor postural stability and attention, speech and language problems and social adjustment difficulties ⁽¹⁻⁸⁾.

A positive outcome of the introduction of the prep year programme is that children with mild or minor problems or immature development can be identified as their difficulties participating fully in the program becomes apparent

On the other hand the early formalisation of education can disadvantage these children who have a different or slower developmental pathway. Inappropriate management can generate an increase in adverse outcomes in learning, function, communication and social skills. Problems in these aspects are likely to limit the child's ability to participate optimally in age appropriate activities. This in turn can impact on their long term social, educational and physical development.

Some common examples of difficulties faced by such children include :-

In the classroom

- An inability to sit in one place or without support for a period of time due to postural instability. There is tendency therefore for them to move around the room more frequently or constantly wriggle or fidget thus disrupting the other children .
- Poor fine motor skills and co-ordination. Many children do not fully develop the muscle control to hold a pencil correctly or manipulate scissors and paper until at least 5 years of age. Children with minor problems as described above may take even longer to acquire such fine motor skills.
- Being disorganised or having difficulty sustaining or directing attention.
- Presenting with behaviours that may be challenging / immature as they may be less able to self regulate.
- Less ability to cope with multi sensory input such as – listening -looking and-comprehending , leading to difficulty following instructions and thus they miss out on important information.
- Early onset of fatigue. Children who have mild difficulties need to concentrate more and try harder than their peers and often get extremely tired especially as the day proceeds

In the playground

- Poor balance. This can adversely affect their ability to join peers using play equipment while in a busy crowded environment. Sometimes the child is inadvertently bumped and may put out their hands to seek balance, and this can be misconstrued as inappropriate touching or pushing.
- Poor gross motor skills can limit the child's ability to participate in play with peers (outdoor or indoor), and so reduce his opportunity to practice and develop skill.

In self care .

- In toileting there are several issues to consider which are difficult for such children to manage, including: time to get to the toilet in time, managing their clothing, the height of the toilet and the ability to turn the taps to wash hands.
- At lunch time difficulties include coping with opening their lunch box and eating food in the time allowed.
- An onset of fatigue during formal sessions may a problem due to a need for more frequent food intake (small food snacks). If a child has been to 'before school care' it can be a long gap until morning tea time

Social constraints

- An inability to understand nonverbal cues especially in a group situation.
- An inability to self regulate their responses, to wait their turn and not interrupt.

To address some of the difficulties experienced by these children there is a need for:-

- More flexibility in age for entry into prep followed by grade one.
- More than one adult in every class for the whole day
- More than one adult per group supervising play in the play ground.
- Access to appropriate therapy services (physiotherapy, occupational therapy and speech pathology) for advice, support and referral for more specific therapy intervention as required.
- Close communication with parents to learn from their knowledge and perception of their child's needs
- Teachers to have training to increase their ability to recognise those young children who are having developmental difficulties in movement, stability, attention, communication and behaviour and to have the opportunity to learn some basic management skills that they can use in the classroom .

This group of children usually continue to have problems as they enter the more formal years of schooling. Currently many do not receive any support or assistance in school as their specific problems are not recognised and there is no access to therapy advice in the education system. Therapy services in education are limited to facilitating learning and educational opportunities for children with moderately severe and severe disabilities, and do not address the needs of this younger group of children.

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SUBMISSION TO:

**PRODUCTIVITY AGENDA WORKING GROUP—EDUCATION, SKILLS, TRAINING
AND EARLY CHILDHOOD DEVELOPMENT**

in relation to

**A NATIONAL QUALITY FRAMEWORK FOR
EARLY CHILDHOOD EDUCATION AND CARE**

September 2008

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NATURE OF INTEREST

Prue Walsh is the principal of a company, Play Environment Consulting Pty Ltd, which specialises in designing play spaces for children. The company was established in 1988, and has been involved in planning and design of over 2,000 play-based facilities throughout Australia and overseas.

Drawing on a background as an early childhood educator, Prue Walsh's work focuses on the physical environment (the settings which will be developmentally appropriate and promote learning-through-play. In her work, she takes into account the cultural and geographic background of the users; for example, an Aboriginal child does not use the physical space in the same way as other cultures.

In essence, she strongly supports the concept (developed by Reggio Emilia) that:

The physical environment is the third teacher.

Accordingly, the objective of this submission is to highlight that children do not play in a vacuum but need to be developmentally supported by the physical environment in equal terms to social environments.

NQFI: STRONG QUALITY STANDARDS

I would agree with the key drivers of quality listed in section 5.2 of this paper.

While my interest is primarily on physical environment (the settings), I would strongly emphasise the inter-relatedness of the six drivers. A suboptimal quality in any one of these will adversely affect the other drivers. It is well established that poor settings cause stress on teachers (increasing staff turnover rates) and children (noise, aggressive behaviour, poor cognitive/emotional development).

Coverage

My work covers play environments throughout Australia so I am perhaps more aware of the variations [service, geographical location, climate and culture] which exist.

A core set of standards would be very very small; limited perhaps to total space, allocation of space to function (range of potential play facilities, access routes, relation to backup components) and reference to acknowledge the need to accommodate age/skill variations. This would need to be in terms of concepts rather than dimensions-driven standards—which would facilitate variations related to the site, service, age of users, staffing etc.

Impacts

There are real drawbacks to using a “standard” building or playground on a non-standard site. Currently few educators or local government approving officers have a background in physical environments which are developmentally appropriate. They need supportive training and guidelines. In the majority of cases, the playground is the first area to be compromised along with climatic and environmental factors. Hidden costs are also created through a lack of cohesive site planning. All too often the officers in charge of vetting these plans are producing the result which is counterproductive to the aim.

Transitions

Educators, regardless of experience, rarely understand the design process and the ways it can maximise the benefits of an individual site’s characteristics.

I would like to see funding of a professional support mechanism which would operate on a get-in get-out basis—as needed. Physical environments do not undergo change frequently, but the effects are long-lasting. Currently, most development/redevelopment projects do not encompass funding for outside expertise, especially early childhood expertise let alone parties with both early childhood and design expertise covering this area.

NQF2: A QUALITY RATING SYSTEM

Any rating system is fraught with problems. I would see the “continual improvement” as being the best objective. Noting that:

- there are gradations in service delivery

- there are always change over time in the expectation of the users (and other stakeholders)
- there tend to be changes in the services required by a community [especially in rural areas, areas of seasonal work, cases of migrant “first settlement”]
- best practice is always evolving, never static.

As any of the above change arise, the physical environment must be capable of being modified to meet the relevant need-driven standards. This affects the rating system developed—and how frequently (and by whom) the system is reviewed.

“Black print” ratings tend to become outmoded quickly, since they are not responsive to changes especially when left in the hands of parties without any real depth of knowledge in this area. It is essential that any system developed should act as a scaffold to quality leaving room for change within its framework so that changes needed to meet both child and community needs can be accommodated within its framework. The scaffold in short is the protection of children’s rights.

NQF3: STREAMLINED AND/OR INTEGRATED LICENSING AND ACCREDITATION ARRANGEMENTS

The current system is characterised by defining “minimum standards” in legislation/accreditation. In too many instances, this is used by developers to cut costs—even to the point of defining a playground as a high-rise balcony. This becomes a point of conflict with local government development control planning bodies.

There is also variation between states on physical environment standards: very few of which are based on research, because they tend to rely on blind acceptance of other states’ poorly researched parameters, reactive responses to splinter issues (eg. safety) or the Building Code of Australia—none of which have sufficiently taken into account research covering child development needs and the research of physical environments that support it. This is not geared to the needs of early childhood development. The ECA has developed more appropriate physical environment guidelines. Best Practice books are also available which have stood as benchmark references in a court of law. Current regulations are the lowest common denominator; they are not desirable and they fail to protect young children’s developmental needs during their most vulnerable years.

Transitions

Facilities currently accredited will find it difficult to change their physical environments. If, for example, the outdoor learning area was increased in size to accord with Scandinavian standards, it would mean purchasing additional land; this could be difficult in inner urban areas (yet these are the most space-disadvantaged children in Australia).

Clever design can improve the use of space and add value to the facility. In practice however it does incur hidden costs and requires exceptionally highly skilled, informed planning from both an early childhood and a design perspective—rarely if ever

available. Consideration could be given special one-off funding to meet improved standards.

NQF4: WORKFORCE

A small survey of early childhood professional in Queensland (2005/6) found that the working conditions were the greatest drivers of dissatisfaction. This included excessive administration, poor resourcing and substandard physical environments.

In relation to the Indigenous workforce, the approach taken by Kamilda College in Darwin [where they sought to establish a childcare facility on campus—and will use it to train College students in the practicalities of childcare] is commended; the college has a high Aboriginal population.

EYLF1: PURPOSE OF THE FRAMEWORK

In terms of philosophy, physical environments (if they are to support learning) must be driven by developmentally appropriate principals. Young children develop at different rates—no two children are the same. They develop individually and unevenly in comparison with one another; a child may be aged 0–3 years in physical development, but be age-5 years in cognitive development.

A framework should be capable of supporting activities which will motivate and inspire child's learning. To do this they need to be skill-appropriate as Vygotsky states: they need to be presented with a zone of proximal development where the teacher and the physical environment act as the scaffolding needed to reach the next level of development. This is particularly true of children with disabilities, and those in transition between being a toddler and being a 3-year old. It is not just a matter of dimensions of steps, grip surfaces etc. but of controlling access to activities with physical risks, or social groupings, or loose parts which they cannot yet handle.

Documentation

I would strongly advocate the development of Best Practice Physical Environment guidelines. The draft guidelines written for the Northern Territory certainly, had chapters on service and cultural variations; this could be updated within 9 months to provide a basis for the framework.

EYI-F2: RESEARCH FINDINGS

While there is extensive research on the social and economic factors, very little exists on physical environments.

Some of the behavioural research is excellent on the relative effects of poor or substandard settings—but basic research into what constitutes a basic amount of space and layout is lacking.

What is the impact on children's development of skills when playing facilities which are too small, too crowded, have too little ventilation, are unsafe?

These need to be researched—and then conveyed to the educators. A most recent example is that children who spend too long inside have a greater preponderance of short-sightedness—outdoor play changes this.

Greater assessment of the financial consequences of poor physical environment needs to be established:

- how often do staff attempt to get the buildings and playgrounds altered because they are basically failing to meet children's developmental needs
- what is the financial cost of what is nearly always an *ad hoc* development
- how are small capital grants from organisations (like the Gambling Commission or the Better Schools Program) spent? Are these actually benefiting the children or is the funding promoting: a pattern of *ad hoc* alterations, commercial expenditures without proper planning. In my experience, the latter is the reality.
- the bigger picture, taking into account Heckman's work emphasising the importance of the investment in the early childhood years.

More research is needed covering physical environments that: constrain effective outdoor practice, do not create the inviting and stimulating environment needed to extend children's learning, and result in spaces that are neither functional nor time effective for the staff to use (so that their time is spent first and foremost liaising with children and supporting their needs).

EYLF3: FOUNDATIONS

For us to move forward, it is essential that the vision is based on soundly based research being turned into effective practice. For example:

What are the basic parameters needed for an effective physical environment and what are the consequences of providing this provision?

Can the physical environments be manipulated to reflect different cultural norms or be adjusted to meet different developmental needs?

Is it reasonable to try and put long-day-care facilities for older children in facilities geared for younger children in long-day-care? Consistent feedback says it doesn't work—why?

What is the consequence of succumbing to political pressure to cut out outdoor play areas in inner city areas? Is it contributing to obesity, short-sightedness, poor coordination? My first-hand experiences means that I believe so.

EYLF 4: BUILDING A FRAMEWORK

INQUIRY INTO THE PROVISION OF CHILDCARE SUPPLEMENTARY MATERIAL

CHILDCARE STAFF CONCERNS

July 2009

Background to supplementary material

In June 2009, a Central Queensland Workshop was sponsored by the Professional Support Network for *Professional Development for the Child Care Sector in Queensland*. Comments provided by workshop participants relate to this inquiry's term of reference:

- ***The role of governments in licencing requirements to operate childcare centres.***

The comments are consistent with trends across the sector—their importance lies in that they are sourced from on-the-ground teachers working within the licencing requirements.

Comment #A: Teacher input to planning/design of centres

There is a significant difference between for-profit and community-run centres; this is expressed in two major areas.

- Planning/design decisions in for-profit centres tend to be taken by accountants, financial sources and (sometimes) administrators/educators with no qualifications in childcare. This leads to cut corners and acceptance of “minimum” licencing requirements as synonymous with “maximum”.
 - ⇒ leads to even new centre with unworkable spaces, especially for playground provision. For example, one that has been opened for 6 months has 2 playground areas of minimum licencing size. The only play provision is a sandpit in one playground and a climbing structure in the other.
- Decisions relating to the services offered [eg. age groups, periods of operation] are made without teacher-input to the needed supportive designs in the for-profit area.
 - ⇒ leads to inappropriate infrastructure with serious consequences for infrastructure with serious consequences for teaching programs in long daycare.

Comment #B: Working conditions for staff

The licencing requirements focus on staff: child ratios but tend to ignore other aspects (which often happen but tend to ignore other aspects (which often happen “below the radar”) this can lead to staff stress in the for-profit sector:

- Salaries tend to follow a Federal Award which is lower than the Queensland Award.

- The only time teachers had a break during the day was for 10 minutes when the children were having a sleep
- Community-based centres ensure staff have a break.
- Staff can be required to allow additional children into the centre for cash. This was the reason for 2 of the 10 Childcare staff involved in the discussion resigning from previous centres.

Comment #C: Advice from government officers

There was general agreement that advice on centre design was lacking, misplaced or (at best) suboptimal. Staff from both Community and Private centres felt that government officers were negative, critical and unsupportive. The situation was aggravated by lack of informative documentation or interpretation.

An area of special concern was the interrelationships between playground safety and play value (learning through play programs). For example:

- Safety requirements were considered laughable and creating further obstruction to the provision of play. Examples of ripping out roses because of the risk of prickles, an obsession with shade cover throughout the entire playground without any mention of increasing play provision was noted. Staff felt it was clear that government officers had insufficient training in playground safety, there was a critical lack of supportive documents to assist safety procedures and a number of officers did not have early childhood training to provide relevant, needed support.
- A private operator and husband who attended the workshop backed the above remarks. They expressed concern about the lack of accurate and relevant information provided to parties establishing services. They felt they had been badly advised commercially due to a lack of any early childhood expertise in the information provided. It was of deep concern to them that they had done a number of things in good faith and were appalled to find in practice that this material did not work and the financial figures provided were unrealistic and inappropriate. They said they would welcome assistance both in terms of consultation and documentation towards upgrading their playground. However, the budget set by the developers had not allowed for any leeway to upgrade facilities. They considered that accountability attached to upgrading and tax incentives for doing so could rectify the situation.

Comment #D: Funding

All staff felt that a greater degree of accountability needed to be attached to government funding, particularly in private centres so that children and staff are not disadvantaged. An overview of a centre's needs was more important than piecemeal funding.

IN SUMMARY

Overall, staff felt powerless to create needed change. The best they could do was to seek another job and resign from their existing job informing the owners why they were leaving. They expressed deep concerns about their choice of career and stated that they only stayed because "they really loved working with children". They unanimously agreed that "the current system doesn't work and it is not in the interest of children"

INQUIRY INTO THE PROVISION OF CHILDCARE SUPPLEMENTARY MATERIAL

DIRECTOR'S CONCERNS

July 2009

Background to supplementary material

In June 2009, an experienced (11 years, 4-year trained) early childhood centre Director offered comments about the provision of childcare.

Although this was an informal event, the comments reflect commonly-held on-the-ground opinions. I believe they have relevance to the Senate Standing Committee's inquiry in relation to

- ABC Learning's practices and culture
- Staffing qualifications and professionalism
- Government role in accreditation

Comment A: ABC Learning practices and culture

Unlike ABC Learning, most community-based centres could not make a profit of \$50,000 a year. Our centre is allowed 54 children/day at \$61 per day for 0-2's and \$59 per day for 2-5's—so that while we could expand (economies of scale) the profit is still nowhere near that.

ABC Learning's staff was (mainly) not TAFE trained; they had their own training courses. Their courses were very narrowly focussed; staff was not allowed to network with "outsiders" even in in-service seminars; staff had to follow set rules/programs in teaching. To take on ABC Learning staff would mean retraining them.

The whole childcare industry knew that ABC Learning failure was a question of "not if, but when".

Comment B: Staffing qualifications and professionalism

Community-based centres tend to focus on keeping quality staff (our largest expense); we feel this gives us continuity of contact with the users. We have 20 staff (some of whom are part-time) for the 54 children per day. We actively encourage staff to undertake TAFE studies, and direct them to TAFE centres with excellent records of teaching (both theory and practical aspects). We carefully assess staff qualifications before employing them.

Staffing professionalism is never taken for granted. But staff at other centres left because they felt professionally compromised.

Comment C: Government role in accreditation

Accreditation is good, but there are loop-holes. We understand that a new system is coming, but we don't know what it will be.

Sometimes the validators push their own opinions (even though they are trained the same way). This causes problems. It would be of benefit if more information on layout and planning and use of setting was given to help develop new centres, alter existing ones and utilise what we already have.