



nsw commission for
children & young people

Mr John Carter
Committee Secretary
Senate Education, Employment and Workplace Relations Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Mr Carter

I am writing regarding the *Inquiry into the provision of childcare*.

I consider that the development of the National Quality Framework for Early Childhood Education and Care offers an opportunity to adopt a coordinated approach to the provision of early childhood education and care across Australia.

I have attached a submission made by the Commission jointly with other Australian Commissioners for Children in response to the discussion paper on this Framework. The submission highlights the need for a public supply, rather than investment demand strategy, for early education and care. The collapse of ABC Learning is further evidence of the need for such a strategy.

The submission also provides recommendations in relation to the care and education of young children across Australia which are relevant to your current Inquiry.

Thank you for the opportunity to comment. If you require any further information, please contact the Commission's Manager, Policy, Ms Maj-Britt Engelhardt, on 9286 7205 or at maj-britt.engelhardt@kids.nsw.gov.au.

Yours sincerely

Gillian Calvert
Commissioner
19 December 2008

Encl. Submission to Discussion Paper on National Quality Framework for Early Education and Care

Submission to the *National Quality Framework for Early Education and Care: a discussion paper*

**ACT Children and Young People's Commissioner
NSW Commission for Children and Young People
Queensland Commission for Children and Young People and
Child Guardian
Commissioner for Children Tasmania
WA Commissioner for Children and Young People**

September 2008

1. Introduction

We welcome the review of early childhood education and care in Australia and are pleased to make a submission to the discussion paper on developing a National Quality Framework for Early Childhood Education and Care.

This historic opportunity to place children's well-being at the centre of the early childhood education and care system, as part of a comprehensive reform process, is an important and welcome development. We acknowledge the substantial policy and funding initiatives that accompany this opportunity to integrate the 'care' and 'education' sectors and end the historical divide. The lack of consistency in the provision and quality of early childhood services throughout the country can be partly attributed to the existence of this false division.

The Framework offers the opportunity to develop a coordinated approach to the wide range of functions undertaken by various sectors of government and other organisations. It may also help to build on the strengths of those existing services that are providing exemplary education and care for young children and to support all other services either to meet the challenge of the national quality standards or be phased out of the sector.

Public investment in high quality early childhood education and care is important because of the positive impacts on the health and well-being of the children who access these services, and will result in a better educated and skilled population over time. Such investment will enable working parents¹ to know that their children are well cared for and receiving quality education. Investing in the early childhood education and care sector directly supports COAG's education reforms aimed at lifting the ability of all young Australians to engage, learn and achieve at

¹ Throughout this submission the term 'parent' includes kinship and foster carers.

school and ensure they are well-prepared for life and further learning (COAG, 2008).

While our submission focuses on early education and care in the context of the National Quality Framework, we believe that to have the best outcomes for all children, the Framework should be developed within the context of broader early childhood policies. Clear links should be established between the Framework, national strategies for supporting family friendly work practices, national child and maternal health strategies and the proposed National Child Protection Framework.

Supporting quality early childhood education and care in formal early childhood settings is only one part of fostering children's well-being. In order to have the best possible outcomes for children's well-being and development we believe that parents need to be supported to spend time at home with their babies through a universal paid parental leave scheme of at least 12 months. As part of providing support for parents to raise their children well, we consider that flexible work practices are central.

The provision of care and support services for children whose parents who are not in the workforce should also be an important consideration, particularly where children and families are subject to disadvantage. High quality childcare and an evidenced based early learning framework can enable positive life outcomes for these children.

Key recommendations

We recommend that the National Quality Framework:

1. Is developed within the context of other strategies to support children's well-being in the early years, such as a universal paid parental leave scheme of at least 12 months and flexible working conditions for young families.
2. Identifies that government is responsible for providing a universal, accessible, quality early childhood education and care system, supported by public investment
3. Stipulates that early childhood education and care services come under the auspice of state and territory education portfolios
4. Is focused on social, emotional and developmental outcomes for children and places children's well-being at the core of early childhood education and care services.
5. Applies consistently to all early childhood education and care services across Australia and to children prior to school.

6. Promotes the need for early childhood education and care services to support parents in providing a positive home learning environment and caring for their children.
7. Enshrines play as an essential component of early childhood education and care services.
8. Reflects an approach that aims to prepare children for life and lifelong learning, rather than a narrow 'readiness for school' approach and encourages learning that takes account of the developmental needs of children with different learning capacities.
9. Includes strategies to support early childhood education and care services so they are safe places for children.
10. Prioritises addressing the early education and care needs of disadvantaged children.
11. Includes a strong and enforced regulatory framework that addresses key structural components of quality such as staff to child ratio, group size, responsive adult child relationships and caregiver qualifications.
12. Require all early childhood education and care services to be monitored and enforced with a hierarchy of sanctions in response to non compliance.
13. Include an accreditation system in which the quality of children's experiences are central and children are involved.
14. Require staff to child ratios for children under two years of age of ideally 1:2, but at least 1:3.
15. Require all staff working directly with children to have a minimum level of training related to early childhood education and care.
16. Includes strategies for maintaining consistency of staff.
17. Is accompanied by training and support for staff who will be teaching as part of the learning framework.
18. Be implemented in a stage by stage approach.
19. Be facilitated by a national support program funded at a local level to provide advice and support to services to implement the Framework and advance the quality of care for children.
20. A reassessment of the current system of subsidies for individual families.

21. Be accompanied by a national research program to assess whether the Framework is achieving its aims of improving quality.

2. Why good quality early childhood settings are important for children

A review of early childhood education and care in Australia is warranted in light of the strong body of research now established on the fundamental importance of the early years of life and the type of care that can most benefit children's well-being. The review is also timely given the increasing demand by families for formal child care and the complexity of the current system in Australia.

The quality of children's early experiences, including of early childhood education and care, has a significant impact on children's lives. As children's brains are developing at a fast rate in their first few years of life, it is critical that children receive the stimulation they need to promote positive learning and healthy brain development.

The quality of early childhood settings impacts on children's daily experiences, their healthy brain development, as well as their response to experiences at school and throughout their lives. High quality early childhood settings benefit children socially, behaviourally and intellectually well into their childhood and later life (Sammon et al., 2004). In comparison, low quality early childhood settings can lead to children being more aggressive, less able to regulate their behaviour and having language difficulties (Baker, Gruber and Milligan, 2005). These benefits and effects are amplified for vulnerable children from disadvantaged backgrounds (Melhuish, 2004).

3. Why governments should be responsible for the provision of high quality early childhood education and care

While the Australian Government's commitment to universal access to quality early learning programs for all children in the year before school is welcome, a similar commitment for all children, especially in the very early years, is just as important.

Current events in the child care sector provide an opportunity for the Australian and State/Territory Governments to take the lead in both the planning and provision of a comprehensive quality early childhood education and care system, regardless of setting, that responds effectively to the educational and care needs of all children in the early years.

This need is especially acute for the most disadvantaged children whose life circumstances mean that by the time they enter compulsory school settings they are already significantly disadvantaged and in need of extra support.

A visionary and innovative early childhood education and care service perspective, supported by public investment, should focus on and deliver multiple goals. In policy terms, the provision of child care has over recent years come to be viewed mainly as a workforce issue. While workforce participation (especially for women) is important for children's well-being, choices for parents should not compromise outcomes for children. Investment in early childhood education and care has short and long-term social, educational and economic benefits for both the individual child and the economy (Tayler, 2008).

Market forces and early childhood education and care

International evidence suggests that a demand side investment strategy, such as the current Australian Government model, is inferior to a public supply side investment model. A public supply model would not only lead to more uniform quality early childhood education and care services, but also allow for superior coverage of child populations over parent subsidy models (OECD, 2006).

Quality early childhood education and care services are expensive, both at the point of establishment and in terms of ongoing staffing costs, especially with appropriately qualified staff. Future government funding for the sector must link directly to the cost drivers of quality and positive outcomes for children, in particular, the employment and retention of appropriately qualified staff, smaller group sizes for children and appropriate child to adult ratios.

Providers of early childhood education and care with the best interests of children as their primary focus should be supported to operate and provide quality care, while those unable to meet the new National Quality Standards should be phased out of the system.

There are questions as to the effectiveness of the Australian Government's substantial spending to support the current child care system (OECD, 2006; Tayler, 2008). Market forces, private provision of services, an accreditation system and the Child Care Benefit rebate have all been described by the Government as mechanisms that would deliver affordable, quality childcare that would be good for children and give parents more choice (Elliot, 2006). There is no evidence that the desired outcomes have occurred in a consistent and universal way. Rather, in some places undesirable outcomes for children, families and Australia have occurred (Rush, 2006; Tayler, 2008).

The complexity and relationship-based nature of early childhood care and education services means these cannot be managed in the same market-based way as other commercial industries. Pressures to increase profits over children's needs can pose ethical dilemmas for staff (Elliot, 2006). For instance, a six-week old baby enrolled in such a service will never get back the two years it may take the service to 'get things right', or decide the business is not viable. Market time frames do not fit well with the developmental time frames of young children.

Choice for families

We believe that parents should feel empowered and welcome to be involved with their child's early childhood education and care service at all levels. This should start from the very early decision of choosing a service right for their family to parents becoming genuine partners in the education and care of their children within formal settings.

It is important that providing choice and affordable services for parents in the short-term does not compromise the education, care and long-term outcomes of the children. Working parents need to be confident and reassured about high quality if they are to be productive and effective at work.

It has been argued by governments that the current funding model allows parents to choose the service that meets their needs (Elliot, 2006), and can 'simply' withdraw their children and find another service if quality is lacking. It is never a 'simple' matter to remove a child from an unsatisfactory service. The child is likely to have already developed important attachment relationships with staff and other children. A vacancy may also not be readily available when an alternative service with high quality, affordable fees and in the right location is found.

While parent demand for not-for profit services remains high, real choices are limited with the number of not-for-profit long-day-care services declining over the last decade. Approximately 70% of services in Australia now privately delivered (Brennan, 2008). In some locations, a number of services are managed by the same provider, hence further restricting genuine choice.

Increasing costs is another issue with the demand side investment strategy. In some instances costs are a barrier to families accessing services for all their children. In particular, in many low income families there are no adults employed in the paid workforce, which means children from these families may not receive any early childhood education and care services before compulsory schooling (AIHW, 2006; Lloyd, R., Harding, A. and Payne, A. 2004). This is despite the evidence that these children get the most benefit from it.

State education portfolios to auspice early childhood education and care services

We agree with the statement in the Discussion Paper, "state and territory governments are best placed to provide integrated service delivery for children and their families locally." (p.4). We are also of the view that all early childhood education and care services should be administered by a specialist office within each respective state or territory education department.

Moving all early childhood education and care services under the jurisdiction of education departments would achieve a number of aims, including:

- assisting in overcoming the education and care divide;
- improving the status and standing of staff;
- building seamless links between the early years and compulsory schooling;

- facilitating national integration and consistency; and
- supporting the Outside-School-Hours-Care sector.

However, this will require a cultural shift and refocusing of education departments to a lifelong learning model that supports the best outcomes for young children. Integrated support and other services, parental involvement and a play-based approach to learning, which are essential to high quality early childhood education and care, will need to become part of the approach of state and territory education systems.

Further, the system must reduce the administrative burden on services. In particular, the workload around compliance should be reduced so early childhood staff can focus more on caring for children and supporting their learning.

4. Putting children's well-being at the core of the National Quality Framework

We recommend an approach to the Framework that is focused on holistic child development outcomes and places children's well-being and the quality of services to young children at the core of early childhood settings. This will require the Framework to go beyond the often used deficit indicators of well-being to identify measurable well-being outcomes and indicators that are directly informed by children.

Current policy on early childhood education and care does not go far enough to place children at the core of services. We are pleased to see the Australian Government expanding its focus from child care as a means of increasing productivity to recognising child care as an important way to assist families provide the best start for their children's well-being. Improving quality in early childhood settings is an essential part of providing services that promote children's well-being. A shift to placing children's well-being at the core of early childhood education and care services is needed particularly in the light of growing evidence on children's developmental needs.

Solid investment in the early years is likely to have the most beneficial impact on the well-being of Australia's population and productivity in the future. Supporting the early one to one interactions that promote development of children's capacities to regulate their behaviour, engage in back and forth communication and problem solve (Mustard, McCain & Shanker, 2007) is essential.

We strongly support an approach which does not separate care and learning. A move to a system which focuses on children's holistic well-being is consistent with our knowledge that from birth children have a desire for learning and that their development happens in the context of their relationships with caregivers and others. To this end, we also consider that the role of families needs to be strengthened within the Framework. We recommend that the Framework promotes the need for early childhood education and care services to support

parents care for and provide a positive home learning environment for their children.

The Framework should apply to all children before they attend school and in all early childhood education and care services across Australia.

We support a concise, rather than exhaustive, approach to the National Quality Framework that provides guidance for individual services to apply the quality standards as suits the needs of their community and children within their service (Moss, 2007). This may include the development of alternate or flexible models for rural and remote locations to increase capacity to provide high standard services.

We believe that understanding what makes a good childhood, and seeing children as competent, active learners in early childhood settings is fundamental to developing a National Quality Framework for Early Childhood Education and Care that supports children's well-being.

5. What children need from early childhood settings

Children's services need to be places for children to form friendships, play, learn and to be a part of the cultural life of the community. To this end, the early childhood service needs to be more broadly reconceptualised from being a place where children *can be left* while their parents are at work, to becoming a place *where children can go* for friendship, interaction, nurturing, learning and support. (Press, 2006)

Good relationships

As children often tell us, and much research with children confirms, their relationships with others are the most important factor in their lives. Children develop through their social interactions and relationships. There is compelling scientific evidence showing that the quality of interactions between children and their caregiver sets the foundation for healthy brain development and therefore long term mental and physical health (Mustard, McCain & Shanker, 2007).

Positive relationships with caregivers and other children are essential to children receiving high quality care in early childhood settings (Sammon et al., 2004). Children need loving, consistent and continuous interactions with caregivers (Mustard, McCain & Shanker, 2007). Staff-to-child ratios and group sizes are two of the most significant quality indicators that impact on the relationships children have with caregivers and other children in child care. Addressing high staff turnover is also a significant issue when considering the ability of children to develop positive relationships with their caregivers. In particular, these high quality interactions assist in making services more inclusive and appropriate for children with a disability (Buysse & Bailey, 1993). Children with disabilities who attend inclusive programs have more positive social interactions and behavioural

outcomes than those in segregated programs (Buysse & Bailey (1993). High staff turnover is associated with lower quality services and poorer outcomes for children (Love, Harrison & Sagi-Schwarz et al., 2003).

To foster positive relationships around children early childhood education and care services need to involve parents in the provision of their services. Involving parents can be an effective way of supporting children to learn at home. The UK Effective Provision of Pre-School Education Project (EPPE) shows that a positive home learning environment has a positive impact on children's developmental outcomes well into primary school (Sammon et al., 2004).

Opportunities for play

Play should be an essential component of any learning framework for early childhood education and care settings. Parents and the community require information and support about play based learning and its role as an effective way of supporting the learning and development of infants and toddlers.

Play engages children and promotes learning. The qualities developed through play are the same qualities children need to succeed in school (Mustard, McCain & Shanker, 2007). The role of caregivers in play is particularly important. Nurturing caregivers qualified in early childhood education question, challenge, offer choices and actively engage in play with children. In this way caregivers scaffold children's learning. A child's ability to build bridges between ideas, connecting feelings, facts, and new understandings about how the world works develops from first hand, concrete experiences which can be had during play.

Play should be reflective of the diversity of children's cultural backgrounds and ability. Special attention and recognition needs to be given to the learning style of Indigenous children. A play-based early learning framework should also encourage caregivers to help children understand and accept differences between them and other children.

To develop their sense of agency through learning

Respect for, and understanding of, children as active agents at an early age encourages children's sense of agency in their own worlds at home and in child care. It also encourages children to become more active citizens and be engaged in their broader communities.

Children need to be meaningfully engaged as partners by those who care for and work with them. An essential part of supporting children as active agents is respect for the child's natural learning strategies. For this reason early childhood teachers and caregivers need to have the skills and qualifications to adapt learning to children's individual needs and strengths, including different rates of learning capacity and cultural differences. Services also need to consider ways to involve children's interests in the day-to-day experiences and learning programs. An important part of developing children's sense of agency is giving them the opportunity to initiate and lead learning experiences in early childhood settings.

How services develop children's sense of community and responsibility for others is also an important measure of quality. As the EPPE study shows, the emphasis of learning in the early years need not only be on literacy or numeracy to achieve good performance in these areas in later years. Settings in the study that also emphasised children's learning about diversity promoted better academic outcomes for children in their future schooling (Sylva et al., 2004).

Safe environments

We recommend that the National Quality Framework includes strategies to support early childhood education and care services to address risks so that children's services are safe places for children. Providing safe early childhood settings is essential for children's well-being. We recognise that managed risks, such as climbing, balancing or playing in nature, are an essential part of children's learning. However, we are concerned about risks that can arise from the individuals employed to work with children, the way a role is managed and how a service is managed. Evidence shows that safe organisations are those in which risks to children are identified and steps taken to minimise those risks.

Promoting a sense of agency amongst children is a valuable strategy for making services safer for children. When children feel respected and listened to they are more likely to speak up about their concerns. Actively encouraging parents to participate in the care of their children and be kept informed of their child's progress can contribute significantly to creating safe environments for children.

A combination of strategies is needed. To be effective these must address organisational, personal and situational factors (Smallbone, Marshall and Wortley, 2008).

6. How the National Quality Framework can support children's well-being

Prioritise the learning and care needs of disadvantaged children

High quality early childhood education and care has the most significant benefits for children from disadvantaged families (Melhuish, 2004). Therefore, while the National Quality Framework should aim to provide universal education and care, the needs of disadvantaged children should be prioritised.

We support COAG's specific attention to supporting quality early education and care for Indigenous children and their families. In particular, we commend the Australian Government's initiative to provide 15 hours of preschool for Indigenous children aged four years old. We would encourage the Government to extend this to 15 hours of early childhood education and care for Indigenous children aged three or four years.

Priority should also be given to babies and young children identified as at risk of harm and neglect. Access to a minimum level of care each week would help counteract the effects of maltreatment by providing positive relationships, stimulation and activities that promote health and well-being in a safe

environment. It also helps to improve outcomes for children at risk by providing respite for parents and opportunities for informal parenting support.

However, the removal of barriers to early childhood education and care needs to happen concurrently with improvements to service quality to avoid negative outcomes for Indigenous, at risk and other vulnerable children as a result of poor quality programs.

A priority goal should be the establishment of the Australian Government's proposed 260 early learning and care centres in every state and/or territory in identified areas of need. A collaborative approach to early childhood education and care service provision should support the most vulnerable and disadvantaged children and their families.

These centres should be well-resourced and provide genuine centres of excellence. They should include wrap-around, integrated services such as family support, prenatal and antenatal support, playgroups, home parenting support programs and early childhood programs which link in with local primary schools. These integrated centres should include early childhood intervention services for children with disabilities such as diagnosis, assessment, screening and therapy services.

A strong and enforced regulatory framework that addresses the structural components of quality

A consistent, strong and enforced regulatory framework is essential to support and enhance high quality of early childhood education and care settings across Australia. It also provides reassurance for parents that early childhood services provide a safe and supportive environment for their children. Regulation is particularly critical in areas in which parents may have little or no choice as to which service their child uses. Research shows a strong link between weak regulation and poor quality early childhood settings (Friendly et al., 2006).

We recommend that any regulation framework be based on key structural components of quality. Research on quality early childhood settings identifies the key structural components as physical health and safety, physical space, group sizes, staff to child ratios and staff qualifications and training (Press, 2006). The measurable nature of structural components means they can be easily incorporated into regulation. Regulation of such aspects is important as they provide the foundation for quality and are a strong influence on the process components of quality such as caregiver and child relationships.

In order to benefit all young children, we recommend that regulation is nationally consistent and applies across all early childhood education and care services. The current inconsistencies between regulations in states and territories mean that children may receive a poorer quality of care depending on where they live.

To support quality early childhood education and care services for children, we recommend that settings are monitored and enforced with a hierarchy of

sanctions in response to non compliance. This monitoring power should include the ability for a regulator to conduct site visits without notice.

Consideration could also be given to providing incentives to services to reach and surpass standards, such as financial incentives for allowing existing staff to study and upgrade qualifications.

Staff to child ratios

The foundation for many aspects of quality in early childhood education and care settings is staff-to-child ratios and group size. Staff-to-child ratios and group size are important for health, reducing risks to children and enhancing a caregiver's capacity to develop positive relationships with children. Small ratios and group sizes are particularly beneficial for children under two years.

We recommend that the National Quality Framework require staff-to-child ratios for children under two years of age of ideally 1:2, but at least 1:3. Given the importance of consistent, positive and one to one interactions with caregivers for infants' healthy brain development, particularly in their first 18 months, efforts should be concentrated on improving staff to child ratios in the formative early years (Mustard, McCain & Shanker, 2007).

We recommend small group sizes to promote better quality interactions and relationships between caregivers and children. The US National Association for the Education of Young Children (NAEYC) recommends a maximum of six in a group for up to two year olds with group size increasing progressively as children get older, to a maximum of 16-20 for five year olds (Press, 2006)

An accreditation system that accurately assesses the quality of children's experiences

To complement the quantitative measures of quality featured in regulation and achieve quality improvement, we recommend that the National Quality Framework include an accreditation system in which the quality of children's experiences are central. Accreditation should focus on the process components of quality such as interactions between caregivers and children, staff continuity, the implementation of a learning framework and communications between staff and parents (Love, Schochet & Meckstroth, 2002).

Continuous quality improvement

The accreditation system should be holistic and developmental, praising aspects that are of high quality while also highlighting areas that are in need of improvement. A clear pathway for accreditation should be designed to inform services how to improve quality within such aspects. To this end, accreditation needs to encourage continuous quality improvement, rather than only requiring services to meet minimum standards.

All early childhood education and care services should be of the highest quality to benefit all children, not just those in high socio-economic or urban areas. Children, whose families are least able to afford early childhood education and

care, benefit the most from these services, hence all settings need to be of high quality.

Provision of support to meet standards needs to be flexible, accessible and affordable for early childhood education and care services, particularly for rural and remote services. Current fee for service arrangements for professional supports in some areas limit the ability of services to access support. Consideration needs to be given to the provision of resources to services in rural and remote areas to be able to access this support equitably.

We support an outcomes based approach to accreditation that encourages flexibility and innovation, as well as reducing the administrative burden on early childhood settings. Accreditation systems work best when they involve self evaluation and external validation. We encourage an approach to accreditation that includes opportunities for self evaluation by services to help them reflect on their practices and develop in response to the needs of children and families. We also propose external validation by professional peers based on an internationally recognised measurement of quality, such as the Early Childhood Environment Rating Scale (ECERS) and the Infant and Toddler Environment Rating Scale (ITERS), in order to enhance the legitimacy of accreditation findings.

We recommend the involvement of children in the accreditation processes of early childhood education and care services. When given the opportunity, children share their ideas on what makes a good early childhood education and care service, what is most important to them and give feedback on their general experience. As part of accreditation we need to further consider appropriate ways to assess the quality of the experiences that infants and babies have in early childhood settings. Opportunities should also be developed for parents to be involved in accreditation.

Attract and retain an appropriately qualified workforce

Given the importance of caregiver relationships to children, the creation of a stable and suitably qualified early childhood education and care workforce is fundamental to the provision of quality services.

Staff qualifications

We recommend that the National Quality Framework should require all staff working directly with children to have a minimum level of training related to early childhood education and care. The Framework should also require all early childhood education and care services to employ university qualified early childhood teachers to oversee children's programs. It is important that the Framework differentiates between qualified early childhood teachers and other qualified staff in this way so that children receive the benefits of a qualified early childhood teacher as well as other caregivers. To provide the most appropriate care for babies this may mean having a caregiver with child and maternal nursing qualifications.

The requirement to have qualified early childhood teachers should apply to long day care services as well as preschool. This approach provides better continuity of care and relationships and learning for children. Currently, some children are being transported between long day care and pre schools to participate in early childhood education programs. The number of transitions and relationships a child has to manage in a day is greatly magnified, which can cause stress and is not in a child's interest. The early learning programs should be provided in day care by a qualified early childhood teacher to minimise these transitions and subsequent stress on children and families. This would also provide the benefit of the child maintaining a key relationship with one caregiver or teacher.

Studies show that the strongest indicator of quality services is the level of staff qualifications (Sylva et al., 2004, NICHD 1999). This is just as relevant for home-based care. Higher level staff qualifications are linked to positive adult to child interactions and have the greatest impact on quality outcomes for children (Sylva et al., 2004). Staff training and qualifications count more than experience. Research has shown that qualified caregivers provide higher quality care and less detached care to children (Clarke-Stewart et al., 2002).

Continuity of carers

We recommend that the National Quality Framework focuses not only on staff knowledge and skills, but also on strategies for maintaining consistency of staff. Consistency of staff helps children and families to develop more positive relationships with staff. Staff and children get to know each other the more time they spend together. As scientific evidence tells us, continuity of caregivers and stability of environments is essential for healthy brain development, particularly in infants during their first 18 months of life (McCain, Mustard & Shanker, 2007). Less staff turnover helps the service be more responsive to the individual needs of children and families.

In order to attract and retain staff, wages and conditions in the early childhood sector must be improved. If staff feel valued and are adequately rewarded they are more likely to stay in the sector. We are pleased to see the commitment of the Australian Government to improving the early childhood education and care sector through the National Early Years Workforce. Significant challenges exist in this regard, particularly in rural and remote communities where the attraction and retention of qualified staff is impacted by a number of issues including lack of affordable housing. There is a need to develop the capacity of local people particularly Indigenous people to take up training options and participate in the childcare workforce.

We consider that strategies for attracting and retaining staff must also occur at a national level given the role of the Australian Government in funding universities and facilitating productivity. Further strategies that warrant consideration include increasing opportunities for professional development and the development of pathways for career progression within the sector. Improving staff to child ratios, award conditions and introducing a government funded national paid parental

leave scheme with a return to work guarantee may also assist in improving conditions within the sector and retaining staff.

Staff training

We recommend that the National Quality Framework is accompanied by training and support for staff who will be teaching as part of this learning framework. Children's relationships with early childhood teachers are key to their learning. Research shows that curriculum knowledge as well as an understanding of child development underpins good quality practice (Sylva et al., 2004). Quality early childhood environments are compromised when staff have inadequate curriculum knowledge. As the EPPE study shows, staff with inadequate knowledge miss opportunities to scaffold learning, extend children's thinking, as well as develop their social and problem solving skills (Siraj-Blatchford et al., 2003).

The National Quality Framework needs to support all caregivers to have good rapport with children and to engage them in different environments. To facilitate these skills, pre-service and ongoing training should include experiences for trainees and staff in establishing and developing relationships with children.

Greater initiatives are required to attract and train Indigenous staff. Training providers will need greater flexibility and creativity and the capacity to deliver training modules which suit the style of learning of Indigenous people. Given the difficulties of distance and accommodation in rural and remote areas creativity is needed in providing "on the floor" training at child care centres.

Funding a qualified workforce

Staffing comprise the bulk of costs involved in providing early childhood education and care services. Therefore, strategies to improve staff qualifications, increase child to staff ratios and reduce staff turnover will need a significant increase in funding. We recommend that in addition to increasing funding in these areas, a reassessment of the current system of subsidies for individual families needs to be made, such funds could be redirected into subsidising services. Providing subsidies directly to parents has not contributed to an increase in standards and has possibly caused a lack of balance between private and community providers, as discussed earlier. Direct grants to providers could link to staff ratios and qualification levels, giving providers a financial incentive to increase quality levels.

A learning framework based on children's wellbeing

We support the introduction of a National Early Years Learning Framework for children in the years before school that focuses on children's development and well-being. The National Early Years Learning Framework should be embedded within the broader National Quality Framework so that it is linked to accreditation and quality improvement.

As with the broader Framework, we support a concise, rather than exhaustive, approach to the National Early Years Learning Framework that provides

guidance rather than being prescriptive and provides opportunities for individual services to apply the Framework as suits the needs of their community and children within their service (Moss, 2007). Research shows that a learning framework that has broad developmental intentions and expectations, outlines program directions and shows how developmental outcomes can be monitored contributes to positive outcomes for children's learning (Elliott, 2006).

In order to provide the best start for children the content of the National Early Years Learning Framework must be research informed. It should apply to children from birth given that the most impact can be had in the first few years and the significant influence of parents as 'teachers' of young children.

We recommend that the Framework should not take a narrow 'readiness for school' approach, but rather prepare children for life and lifelong learning. Care needs to be taken that we are not creating additional years of school for our youngest children through a stringent academic-based way of teaching. Rather than having a strict academic approach to teaching, a Framework that develops children's numeracy, literacy, inquiry, social and emotional skills through a play-based approach will be of most benefit to children in their early years. As we know from the work of James Heckman, a focus on social and emotional skills in the early years is just as important as a cognitive focus given the significant influence of non-cognitive skills on long term academic and social success (Heckman et al., 2006).

As children develop and learn through their relationships with others, strategies to improve staff qualifications, staff to child ratios and group size are critical to the implementation of the National Early Years Learning Framework.

Continuity of learning between home, early childhood settings and school is important in facilitating children's cumulative learning (Bertram & Pascal, 2002). To facilitate this continuity we encourage strategies be developed to achieve greater alignment between early childhood settings and formal school, as well as education for parents and school educators on the National Early Years Learning Framework.

7. Implementation of the National Quality Framework

The timeframe for implementation

A clear plan and timetable is essential for the successful implementation of the National Quality Framework. We believe that the proposed timeframe does not provide sufficient time for a full consideration of the issues, for testing the new Framework, gathering feedback, informing the community of the changes and implementing the new Framework. While we commend the Australian Government's commitment to improving early childhood education and care services immediately, the quality of education and care children receive may be affected if sufficient time is not given to fully consider these aspects. For rural and remote services in particular the complexity of issues related to standards,

workforce and qualification will need flexibility and a more extensive process of implementation.

We recommend that the Australian Government approaches implementation of the Framework stage by stage. This will be necessary given that some aspects of quality, such as improving teacher qualifications, will be unattainable for a number of years by many services until more staff complete the recognised and required education programs and additional qualified staff are recruited to the early childhood sector.

Supporting services

Supports must be in place to develop and nurture quality, as it cannot be attained by imposition alone. We recommend that as part of the National Quality Framework a national support program is developed and funded that works at a local level to provide advice and support to service providers to implement the Framework and advance the quality of care for children. Such a program can provide services with any additional assistance they need to engage with vulnerable children and their families, as well as children with additional needs, such as children with disabilities or learning difficulties.

Supporting families

In addition to supporting, and as a complement to, quality early childhood education and care services, we consider that the Australian Government needs to develop strategies to support parents to care for their young children. We are pleased to see the Government's commitment to developing integrated services to complement the provision of child care. However, we consider that other supports are needed and should be linked to the National Quality Framework. These supports include universal paid parental leave, antenatal services and parenting support programs.

Research and data collection

For policy on early childhood education and care services to be properly informed and have the best outcomes for children's well-being, we consider that research, data collection and monitoring needs to be improved nationally. We recommend that a national research program be funded as part of the National Quality Framework to assess whether the Framework is achieving its aims of improving quality. The focus of such a program should be on how aspects of early childhood education and care services impacts on children's well-being which in turn will contribute to improving quality over time.

8. Conclusion

We now know more than ever that a child's early experiences shape healthy brain development and influence lifelong learning, behaviour and health. The early years are a period of heightened sensitivity to negative and positive experiences. Risk-taking in adolescence, mid-life health status and cognitive abilities in later life all have their roots in early childhood experiences.

To have the best outcomes for children's well-being and in the long-term, we believe that the National Quality Framework needs to be child-centred. The Framework should take a broad approach to the education and care of children, including strategies to support families who are at home with their children in addition to strategies to support early childhood and care services. In order to have the best outcomes for children, the Framework cannot be developed or implemented separately from the other policy levers needed to give children a good start in life.

We believe that the National Quality Framework should build and support early childhood education and care services that provide positive relationships between caregivers, children and parents, promote play and a sense of agency amongst children as well as providing safe environments for children.

To achieve these outcomes, the National Quality Framework must feature regulation of the key structural aspects of early childhood education and care services, accreditation that accurately assesses children's experiences and promote children's participation in accreditation. The Framework should include a learning framework that is play-based to enhance children's learning in a way that is an appropriate learning style for their age. There should also be strategies to build a qualified, consistent workforce allowing children to develop positive relationships with consistent caregivers that will assist with their learning.

Given the significance of the early years on children's well-being and long term outcomes it makes sense to develop an early childhood education and care system that is part of, as well as comprehensively funded and supported as, our schooling system. Good quality early childhood education and care represents one of the most effective investments we can make in terms of cost benefits, the well-being of our children and the future well-being and productivity of Australia.

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