



Ms Maxine McKew
Parliamentary Secretary to the Prime Minister,
Early Childhood Education and Childcare
PO Box 600
Eastwood NSW 2122

Tuesday 27 May 2008

**Re. Social Justice In Early Childhood response to Labor's Early Childhood
Education and Child Care Policies**

Dear Ms McKew,

In lieu of our forthcoming meeting with you on 3 June, the Social Justice In Early Childhood (SJIEC) group wish to take this opportunity to respond to Labor's announced policies and to raise some points we wish to discuss at our meeting.

The SJIEC group is a not-for-profit, politically active organisation committed to working for equity and social justice for all children. This commitment has been sustained for 11 years through active participation in the early childhood community and engagement with state and federal governments. SJIEC members comprise early childhood teachers and educators, consultants, academics, researchers, managers, representatives of community organisations and anyone interested in the rights of children.

A hallmark of the SJIEC group, since its inception, is to provide a critical perspective on policies that impact on social justice for children. The SJIEC group is recognised by many peak ECE organisations as consistently taking this critically active role in working with, and advising, State and Federal Governments about early childhood education and care (ECEC) issues. We wish to continue in this role with you and your government.

Ms McKew, the SJIEC group congratulates you on your appointment as Parliamentary Secretary to the Prime Minister, Early Childhood Education and Childcare. As a national activist group for children and early childhood teachers and professionals, we are keen to be involved in discussions pertaining to Labor's Plan for High Quality Child Care. The SJIEC group is pleased to be working with a government that is committed to children and high quality education and care.

This document comprises two main parts. In the first part we iterate the importance of equity and social inclusion principles as key drivers of Labor's early childhood policies. We then draw your attention to three policy areas we believe could be strengthened in current Federal policy, and highlight the equity implications this has on early childhood policy and practice. We also briefly discuss how the use of brain research and school readiness discourses can impede equity for children. In the second part of this document we respond to and raise questions and considerations about the key policy areas outlined on the Office of Early Childhood Education website and that were addressed in the 2008/09 Federal Budget.



Please note that throughout this document we use the term ‘*Early Childhood Education (ECE) Centre.*’ This term refers collectively to preschool and long day care centres and reflects the teaching and learning (i.e. education) that occurs in these settings when they are led by a university trained teacher. We deliberately use the term ‘education’ rather than ‘education and care’ because to us, a high standard of ethical care is implicit in quality education. ‘Centre’ rather than ‘service’ is used to reflect the dynamic learning-teaching process that takes place between teachers, children and families. Early childhood education is not something teachers or staff simply deliver to children in a service oriented sector. Rather, ECE Centres are literally centres of communities, and places where teachers, children and families work together in a teaching and learning environment. In order for education in the early years to be recognised and valued in the same way that primary school education is, language needs to be used that will promote a professional identity, and communicate to the Australian (and international) community that formal learning begins in early childhood, not simply at school.

We look forward to meeting with you to discuss the matters raised in this document.

Kind regards,

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On behalf of Social Justice In Early Childhood



PART 1

Social Justice, Education and Social Inclusion: ALP policy achievements and future challenges

In this section, we respond to ALP policies that we believe raise equity considerations for children, families and early childhood teachers and assistants in ECE centres.

We are pleased that early childhood education sits within the Government's Education portfolio. Additionally, we were pleased to learn that Julia Gillard is not only the Minister for Work Place Relations and Education, but also Social Inclusion. Ms Gillard stated on the 4th April, 2008: *'It's no coincidence that, in addition to being Minister for Education, and Minister for Employment and Workplace Relations, I am also Minister for Social Inclusion. It's because each of these areas is linked to the question of how we become a more prosperous nation without jettisoning the values of fairness and equal opportunity that made us what we are.'* The Rudd Government's commitment to social inclusion is highly commendable. The Government appears to recognise that all kinds of discrimination (denial and breach of rights) can have effects across a number of different parts of the lives of Australian people. We are inspired by the constant use of the term 'closing the gap' for cultural groups that experience discrimination based on the way society is structured.

Nonetheless, we call on Labor to develop a stronger vision for children, one that has the courage and leadership to strive for social inclusion for all children. In particular, we see that there is room for Labor to 'close the gap' on inequity in three areas: Indigenous policy, Refugee policy and GLBTIQ (gay, lesbian, bisexual, transgender, inter-sex and queer) policy. Additionally, we call on Labor to review its use of brain development and school readiness discourses. From a critical early childhood education perspective, we respond to each of these policy areas and discourses below:

Inequity in three key policy areas

(i) Indigenous Policy

We highly commend the Government for undertaking a most historical apology. Furthermore, we recognise the methods by which the government has set out to 'close the gap' between Indigenous and non indigenous Australians, an aim SJIEC shares. We concur, however, with the widespread call for an Indigenous Treaty to legally convert the symbolic intentions of reconciliation and national apology into practice, a call that has been ignored by previous governments. In fact, the Hawke Labor Government acknowledged the need for an Indigenous Treaty in 1988 but it never came to fruition, a shameful outcome compared to New Zealand's Treaty of Waitangi in 1840 (Moreton-Robinson, 2007). Dr Jackie Huggins, from the University of Queensland, has long argued for an Australian Indigenous Treaty, and emphasises it must be developed with Indigenous leaders across the country in her long term efforts as the head of the National Reconciliation Council. It is the Rudd Labor Government's imperative to follow on from the Hawke Labor Government's affirmations, by enacting an Indigenous Treaty.



Following the development of this Treaty, Indigenous perspectives need to be strongly represented throughout *all* policy, philosophy, consultation, development of quality frameworks and regulatory standards, management structures, content and pedagogical approaches, and not just in policy specifically for Indigenous people. For too long, Indigenous issues have been invisible, sidelined, or a tokenistic ‘add on’. Proper representation of Indigenous perspectives can only be achieved if the government works in collaboration with Indigenous peoples, such as Professor Judy Atkinson at Southern Cross University, to reinvent how Australia identifies itself as a nation with the most ancient history in the world. Moreover, a more explicit focus on Indigeneity throughout guiding documents and regulatory stipulations will help ‘close the gap’ in terms of knowledge and practice. It is important to note here that we are not Indigenous, and so cannot speak on behalf of the community, however, we can suggest numerous community people who are part of SJIEC who would be willing to support your efforts.

(ii) Refugees and Asylum Seekers Policy

The Rudd Labor Government has already taken admirable steps to improve policy for refugees and asylum seekers. The abolition of Temporary Protection Visas and the ending of the Pacific Solution are two such steps that SJIEC applauds. We also support the Government’s conviction on keeping children out of detention centres.

We want to stress however, that *all* children, whether born in Australia, migrated to Australia, or seeking asylum and refuge in Australia, should have access to the same rights and services. For example, children have the right to be reunited and connected with all their family members. Currently, although children and women who come to Australia as refugees or asylum seekers are transferred to community housing, often their fathers/husbands are transferred to detention centres. SJIEC believes this family separation is unjust and we urge the Government to change this policy.

In addition, family reunions are made even more difficult if family members are separated internationally (i.e. some family members remain in the country of origin). Currently, government policy requires people, who have had refugee status and are now Australian residents/citizens, to pay thousands of dollars to the government in the form of a ‘detention centre bill’, before they are able to bring their family to Australia. This is disgraceful and we implore the Government to immediately abandon such inhumane policies.

Another children’s right is that of access to universal early childhood education. People who have or have had refugee/asylum seeker status are severely disadvantaged in Australian society. SJIEC believes that child care should be heavily subsidised for refugee/asylum seeker families, whether single parent families or two parent families, to enable both parents to access services simultaneously (such as English language courses).

Our position is to end offshore processing and to abolish the use of detention centres as a means of processing refugees and asylum seekers. Detention centres are inhumane and unjust, and they clearly breach the government’s goals of social inclusion in Australian society. There are numerous

alternatives to detention centres, for example, community billeting has been one approach used by the Australian government in the past.

iv. GLBTIQ Policy

Currently The Greens are the only political party to have a policy pertaining to GLBTIQ people and issues. The Rudd government is well positioned to develop an ALP policy on GLBTIQ people and issues, which would signify an important progressive step in politics today. We applaud the recent steps to enable rights for same sex relationships in terms of superannuation etc, but are troubled that people in same sex relationships continue to be denied the right to marry. While the Government's policies are trying to work towards social justice and inclusion, as early childhood teachers and assistants, we are in a difficult position to heed some principles in the Quality Improvement and Accreditation System. For example, how are early childhood staff to "respect each child's background and abilities" and "treat all children equitably" (Principles 1.4 and 1.5, National Childcare Accreditation Council, 2005) when a child has a GLBTIQ background and when the Government does not treat GLBTIQ families equitably in the eyes of the law? Government policy on GLBTIQ people and issues directly impacts on the work of early childhood teachers and assistants. Early childhood education cannot escape from the discriminatory implications of unjust policy. We therefore challenge the Government to take the big step for equity and social inclusion by legalising gay marriage.

We are aware of the argument that suggests children are not able to understand the significance of laws, family diversity and policy, and are oblivious to the impact on their daily lives. Such arguments, however, are not substantiated with evidence, whereas international research that explores racism, sexism and homophobia with children indicates children are acutely aware of the impact and relevance to their lives (Mac Naughton, 2003, 2005; Robinson & Jones Diaz, 2006).

Over-reliance on two discourses in ALP policy

(i) Brain research

Brain research has been influential in education policy since the 1980s (Bruer, 1999) and continues to have a high impact on politicians today (Gillard, 2008). While brain research has led to some positive developments in education policy and practice, there are also potentially dangerous implications for education if brain research is relied on too heavily to inform early childhood policy.

Several critiques of brain research have identified the potential dangers of an over-reliance on the brain theories. Professor Glenda MacNaughton (Mac Naughton, 2003, 2004) is one such scholar, who raises the following concerns:



- Brain research has relied heavily on experiments with cats, rats and chickens, and many of the conclusions drawn from these experiments have been consumed by a host of policy stakeholders as gospel for human brain functioning.
- Brain research cannot account for the abundance of examples that contradict the findings. There are many people who have not had the ‘ideal’ early childhood experiences advocated by brain researchers, and have not had life-long, disastrous repercussions. In fact, MacNaughton cites examples of people who have experienced difficult early childhoods and have gone on to lead significant and dynamic lives.
- While brain researchers advocate for the utmost importance of the early years, a dangerous reliance on the ‘windows of opportunity’ is perpetuated unnecessarily. This implies that children who have ‘missed the boat’ have no hope. Surely this conflicts with ALP vision for equity in education. Whilst early childhood education is important, it seems unproductive to suggest one educational period is more important than another. It is better to differentiate the educational experiences based on the contextual specificity.

(ii) School readiness

In a similar manner to the way brain research has been positioned politically, school readiness, transition to school and other connected issues pertaining to the relationships between early childhood education and primary school education provide only one perspective on how children progress from one kind of learning environment to another. Indeed, if school education paid more attention to early childhood educational philosophies and connected practices, achievements in school would be significantly greater. In early childhood education the child is perceived to be competent and capable as a learner and treated accordingly. This means that children under five years of age make decisions about learning which enable a meta-cognitive or critical understanding of the learning process.

Trond Waage (2008) argues that children as individuals are not the failures of literacy and numeracy. Instead he demonstrates that children’s success is based on how the system includes them. He argues that we currently live in a system that he calls “the testing regime” which has little reflection on the skills and capacities of children. This advice must be heeded if we are to increase literacy and numeracy outcomes for children. Too often, programmes that focus on school readiness are based on narrow concepts of numeracy (eg: recognising numbers and counting) and literacy (eg: recognising letters and naming them). Moreover, these skills, which children have much earlier than the year prior to school, do not address issues of racism, sexism, homophobia, classism and other forms of discrimination which affect children’s access to learning and subsequent development.

Indeed, overemphasis on narrow notions of numeracy and literacy can be at the expense of learning about equity and social inclusion. MacNaughton (2003) cites numerous examples that illustrate how opportunities for learning in these important areas are not actively pursued in ECE settings. We consider the moral and ethical learning of children to be as important as cognitive learning and thus should comprise a fundamental component of Labor’s education revolution.



‘School readiness’ discourses can also be counter to social inclusion directions because they imply that a child’s value lies in their cognitive ability and future productivity. We would like to see Labor more explicitly demonstrate a valuing and inclusion of all children, for who they are now, irrespective of how ready they will be for school.

If school readiness and transition to school policies embraced these points of social inclusion, then opportunities for children’s learning would be greatly enhanced. The internationally renowned Professor of Early Childhood Education, Dr Iram Siraj-Blatchford from the University of London, has, with colleagues, conducted a large-scale study on effective pedagogy in the early years in the United Kingdom (I. Siraj-Blatchford, Sylva, Muttock, Gilden, & Bell, 2002). Siraj-Blatchford et al’s (2002) research found that early childhood education programs that worked towards equity issues, including gender and race equality, improved “children’s progress in pre-reading, early number concepts...” (p.61). This research makes a strong case for greater investment in diversity and social justice to become core tenets of early education policy and curriculum. In Australia, Miller (2006) examined the QIAS Quality Practices Guide 2005, and found that the guide “delimits the discourses of culture and diversity in the early childhood field”. Miller’s research found that the QIAS Guide had possible implications for teaching, which included:

- tokenistic approaches to multicultural education and care;
- failure to recognise subtle forms of mainstream dominance in key resources;
- the denial of alternative approaches to routines and transitions;
- the application of Western developmental theories to analyse the behaviours of *all* children; and
- the denial of material spaces for diversity (Miller, 2006, p.ii).

Clearly, the Quality Practices Guide does not obligate early childhood teachers and assistants to ensure diversity and social justice are the core principles of teaching practice. A major review of the QIAS Quality Practices Guide, as part of the development of a five tiered system of accreditation, is timely.

ALP is well positioned to make a shift in these policies nationally as well as fund new research based around the effects of discrimination on learning. This may help policy makers and developers of subsequent implementations re-conceive the child as a learner and curriculum approaches.

MacNaughton (2003) offers a comprehensive discussion about models of curriculum and models of the learner. This detailed review of research, with a specific focus on Australia, might prove to be helpful in development of ALP policy and subsequent implementations.

Without a conceptual shift in thinking about how children learn and in what kind of curriculum, the same issues around disadvantage in education will be produced. The current policy directions are at risk of doing so. A critical perspective is not a luxury for those who have time to consider it, rather it should be central all education early childhood through to University teacher training. By this act, literacy and numeracy levels will rise, because children will be better equipped to learn.



PART 2

Key ALP policy areas for early childhood and the 2008/2009 federal budget

Budget Spending

The Budget reflects an inadequate allocation of funds to plan and implement the promises made by the ALP prior to the 2007 Federal Election or the policies following that for early childhood education. We were disappointed to note that in comparison to the \$1.6 billion allocated to the Child Care Rebate, only \$871.6 million has been designated for all other proposed measures (Bryant, 2008). We are concerned, for example, that only just over \$1 million per year, over the next five years, has been allocated to the provision of 15 hours preschool, and that no funds have been allocated to strategies aimed at retaining qualified early childhood teachers. Reflecting on the UK experience, Professor Iram Siraj-Blatchford, in a keynote address to conference delegates in Brisbane (May 2008) warned that given the Federal Government's current budgetary allocation, early childhood education in Australia will not see the rolling out of policy proposals put forward by the ALP (Siraj-Blatchford, 2008). This is clearly of great concern to SJIEC. **What assurance can you give us that Labor will match its rhetoric about the importance of quality early childhood education with more substantial investment?**

Early childhood education and child care

The SJIEC group welcomes Labor's stated commitment to *high* quality ECEC services as Australian and international research consistently shows that it is high quality care that brings optimal education, health and developmental outcomes for children (Sims, 2007).

Can you clarify which early childhood services comprise "early childhood education" and which "child care"? We suggest that this distinction be based on the staffing in each service type i.e. given the employment of university qualified teachers in long day care (LDC) and preschools, these settings constitute ECE centres. Given the untrained staff and care/leisure focus of other service types (family day care, out of school hours care), we suggest that these constitute child care services. In support of this clarification of terms we recommend that all state regulatory standards require at least one university qualified teacher on staff in every early childhood education centre.

ALP Policy Statement

The Australian Government's agenda for early childhood education and child care focuses on providing Australian families with high-quality, accessible and affordable integrated early childhood education and child care. The agenda has a strong emphasis on connecting with schools to ensure all Australian children are fully prepared for learning and life. Investing in the health, education, development and care of our children benefits children and their families, our communities and the economy, and is critical to lifting workforce participation and delivering the Government's productivity agenda.

The Government will work closely with state and territory governments, key child care and early learning stakeholders and families to implement its election commitments in this area.



Universal access to early childhood education

We are pleased that this policy has shifted since it was first announced in Labor's Plan for High Quality. In particular, that "universal preschool provision" has been replaced by "universal access to early childhood education" and that this access is now for a "minimum" 40 weeks per year.

Ensuring that children have access to high quality ECEC services is critical, for reasons outlined in the OECEC website's preamble. However, education should be considered a continuum from birth, and therefore, children need access to a university trained early childhood teacher from birth. We hope to see a graduated extension of this policy to all children in ECEC settings.

We look forward to discussing your views as to how this policy might be implemented in practice.

Will these 15 hours be available for parents using LDC for 48 weeks of the year? How will these 15 hours be allocated, e.g., funding to services or payments to parents? This seems problematic given that 15 hours of preschool is more expensive for parents than 15 hours of long day care. If funding is to be paid to parents will they be able to access CCB for this 15 hours, irrespective of the service type used? We recommend that this funding be given to ECEC services to administer.

Early Years Learning Framework

We draw your attention to concerns we raised about the development of this Framework in a letter to your Office, dated April 16:

"We were ... taken aback to learn of Labor's plan to develop the Framework in what we consider to be a very limited timeframe." Specifically, our concerns pertain to:

- (i) the development of the Framework;
- (ii) the content of the Framework; and
- (iii) how the Framework will be used.

These concerns are in light of the significance and implications the Framework will have for children, families and practitioners once it is endorsed.

ALP Policy Statement

By 2013, all children in the year before formal schooling will have access to 15 hours of Government-funded, play-based early childhood education, for a minimum of 40 weeks per year, delivered by degree-qualified early childhood teachers in public, private and community-based preschools and child care.

This initiative will be underpinned by the development of the Early Years Learning Framework and supported by national quality standards for child care and preschool, in order to raise the quality of early childhood education, regardless of setting, and improve access for disadvantaged children to early learning opportunities. Universal access is to be achieved within five years, working together with state and territory governments.

ALP Policy Statement

The development of a national Early Years Learning Framework which will have a specific emphasis on play-based learning, early literacy and numeracy skills and social development.

The Framework will underpin universal access to early childhood education and be linked to National Quality Standards for Child Care and Preschool to ensure delivery of nationally-consistent and quality early childhood education. The Framework will be developed in consultation with state and territory governments and early childhood experts and educators.

(i) Process concerns:

- That the tender process was by invitation only. We are aware of at least one group of highly respected academics with expertise in early years learning and curriculum development who would have made a submission had they been invited. This is not to criticise the choice of academics to whom the tender was sent. Rather, it is to say that the process lacked transparency.
- That given the magnitude of the Framework, there was only a two week timeframe between the release and deadline of the tender.
- That given the implications the Framework will have for children, families and early childhood services, an April 11 – July 30 timeframe seems insufficient to carry out the enormity of such a project. Academics at our Annual Conference noted that a feature of the policy process in countries that have well developed, comprehensive and effective early childhood policies, such as Sweden and New Zealand, was that the process was considered and over a substantial period of time.
- That the tender process and proposed timeframe for the development of the Framework was not and still is not publicly available on the website of the Office of Early Childhood Education and Child Care. There is much scope for greater transparency and accountability.
- How will participants for the proposed symposiums be elected? Will there be an expression of interest for participation in this? What is the scope (eg. one in each state? A one off meeting? Practitioners/academics?) and brief of these symposiums?
- How will participants for the proposed Expert Panel be elected? Will there be an expression of interest for participation in this?
- What will be the scope of the consultation process?
- Will the literature review that preceded the tender process be made publicly available? Such a review would be an invaluable resource to practitioners and a resource that could inform participants' contributions in the consultation phase

(ii) Content questions:

- What is the rationale for the Framework being a 'learning' and not 'curriculum' Framework? Is there room for discussion on this point?
- The brief for the development of the Framework is rich with developmental references. Whilst children do obviously develop, it is well established in the international literature that a developmental approach to teaching and learning is limited. Will there be scope for the Framework to incorporate other approaches (references can be provided) that are more in keeping with current understandings of the image of children, with rights and capabilities?

(iii) Application questions

- Will the Framework be a mandatory framework? If so, to which early childhood services will the Framework apply?
- Will the Framework be tied to quality assurance?
- Will the Framework be tied to National Standards?
- Will the Framework be tied to funding?"

We look forward to your response to these issues.



National Early Years Workforce Strategy

The SJIEC group commends Labor's proposed initiatives to improve the qualifications of staff in children's services. To take a leadership role in education on a local and international scale, the ECEC workforce in Australia requires considerable improvement and change. New Zealand is one country currently leading the way in ensuring an increase in workforce qualifications.

The Ministry of Education in New Zealand has set targets of full employment of early childhood teachers for every position in every early childhood centre by 2012 (New Zealand Ministry of Education, 2002). It is important to note that there is a high percentage of privately owned childcare centres in New Zealand which has not impeded their commitment to quality.

ALP Policy Statement

Improving the availability of quality early childhood education and child care by investing in the training and education of the early childhood workforce.

The National Early Years Workforce Strategy will include creating additional early childhood education university places each year from 2009, increasing to 1500 commencing students each year by 2011; 50% HECS-HELP remission for early childhood education teachers to work in rural and regional areas, Indigenous communities and areas of socio-economic disadvantage for up to five years; and remove TAFE fees for Diplomas and Advanced Diplomas of Children's Services students over the next four years from 2009.

Following New Zealand's benchmark, we argue that university trained early childhood teachers should be permanent fixtures in schools *and* ECE centres and that this standard be non-negotiable. We propose that all staff working with children in long day care centres have a university qualified Bachelor of Education (Early Childhood); or a TAFE Diploma in Community Services (Children's Services) with a view to up-skill to a university teacher qualification. Funding services to pay for relief staff to enable TAFE trained staff to take up to 15 hours per week paid study leave would be another strategy that would facilitate a highly skilled workforce.

In addition, we consider that Labor's plan for a highly skilled ECEC workforce needs to be supplemented by policies aimed at improving the pay, working conditions and status of staff in children's services. Research is clear that job dissatisfaction and high staff turnover preclude high quality education and care (Fenech, 2006; Fenech, Robertson, Sumsion, & Goodfellow, 2007, 2008). Teachers need to be enticed not just to work in early childhood but to continue to do so. Labor states that the Rudd Government "will invest \$126.6 million over four years to train and retain a high quality early childhood education workforce", yet the package announced in the Budget is geared to training, not retaining, issues (Sylva, Melhuish, Sammons, Siraj-Blatchford, & Taggart, 2004).

There is little point enticing staff to become qualified teachers if, after a limited period, they become dissatisfied and leave not just their position but the sector. Often Early Childhood Teachers leave the early childhood field for primary school education due to poor working conditions and remuneration. The table below, provided by Professor Jennifer Sumsion from Charles Sturt University, starkly illustrates the pay disparity early childhood teachers face. It is therefore imperative that early childhood teachers receive pay parity to that of primary and high school

teachers taking into account teachers in Long Day Care working longer hours for 48 or 50 weeks per year. This would need to include release from face to face (programme and curriculum development time) as part of the working conditions.

Comparison of NSW Teacher Awards (March 2007) (4yr degree)	Preschool (constitutional corporation)	Long day Care (constitutional corporation)	DET
Step 1	40,934	44,061	49,050
With directors' allowance (1 unit)	45,304	48,328	-
Highest increment (after 8 years) with directors' allowance	59,184	60,580	72,454
1 unit	63,632	65,030	-
4 unit	67,365	68,703	-

Table 1: Comparison of NSW Teacher Awards (Sumsion, 2008).

Strong quality standards in child care and preschool

We congratulate Labor for its intention to “lift quality standards” (Labor’s High Quality Child Care Plan, p.9). Given concerns raised in recent research (Fenech, 2007; Sims, Guilfoyle, & Parry, 2005; Tayler, Wills, Hayden, & Wilson, 2006) and policy documents (Organisation for Economic Cooperation and Development, 2006; Press, 2006; Press & Hayes, 2000) such a lift is long overdue. We have comments and questions around:

ALP Policy Statement

Introducing national strong quality standards for child care and preschool and a new quality A-E rating system to drive continuous improvement and provide information to parents.

Consultations with the sector are expected to commence shortly.

1. The development of strong national standards

A national approach to quality assurance and regulation of early childhood services by 2008

Whilst it is unlikely that the COAG agreement to develop a national approach to quality assurance and the regulation of early childhood services by 2008 (referred to on p. 4 of the ALP Plan) will be implemented by December this year, we consider a national approach to quality assurance and regulation to be essential to high quality ECEC services. We would like to see Labor review the 1993 National Child Care Standards, which Tayler et al (2006) note, are not enforced consistently across the country and also do not reflect contemporary research about regulatory standards conducive to high quality ECEC. That Labor is in power both nationally and across the states provides a unique opportunity to establish consistent and robust National Standards that can serve as a more effective platform for the national system of quality assurance discussed earlier, to operate. Without robust National Childcare Standards, an improved system of quality assurance will be hampered in its capacity to effect high quality ECEC.



- **Can Labor commit to developing National Standards with the States and Territories that are consistent with contemporary research about standards conducive to high quality?**
- **What part will the “strong national standards” you refer to play in the development of the new quality assurance system?**

2. The development of an improved system of quality assurance

We applaud Labor’s move to establish five tiers of quality in its proposed revised system of quality assurance. This tiered approach is in keeping with proposed changes made by the SJIEC group (Giugni, Bown, & Fenech, 2007). **We would like the opportunity to discuss our proposed model with you as we believe there is scope for our framework to inform your proposed system.**

It is unclear whether Labor will proceed with Mal Brough’s proposed integration of quality assurance systems. We strongly oppose this proposed integration (as previously outlined in Giugni et al., 2007) and would like assurance from you that Labor will not be implementing this policy.

We also seek confirmation that the new system of quality assurance will apply to long day care centres and preschools, as stated by the Hon Julia Gillard in her Budget Media Release.

Changes to the Child Care Tax Rebate

While we support quarterly payments for families, we are opposed to Labor’s increasing of the Child Care Tax rebate from 30% to 50%. The rebate is regressive and will most advantage higher income families. Over the long term, any financial gains made by families eligible for this rebate may well be offset by fee increases. How does Labor propose to ensure that any potential benefits this policy presents for working families are not offset by fee increases?

High quality child care costs. We believe that Labor will more effectively address affordability issues by financially supporting service providers. We support the reintroduction of operational costs for the not for profit sector.

ALP Policy Statement

Increasing the level of assistance to families with child care costs by increasing the Child Care Tax Rebate from 30% to 50%, up to \$7,500 per child; and paying the rebate quarterly, rather than annually.

Quarterly payments provide more timely assistance to families with their child care costs, with the first payments due from October 2008.

More child care centres

- How will the location of these proposed centres be determined?
- Will these centres be established in targeted areas of need/demand?
- Does the proposal to establish these centres “on school sites and community land” preclude private operation?
- Will these centres cater for children under two years of age?

ALP Policy Statement

Establishing up to 260 additional child care centres across Australia. The Government will look to locate the centres on school grounds or other community land, to avoid the 'double drop off'.

The Australian Government is working collaboratively with state and territory governments to deliver on this measure. Further information about the implementation of this policy will be available in the 2008-09 Budget in May.

One Stop Shops / Integrated Child Care Centres

We look forward to Labor making available a discussion paper on Prime Minister Rudd’s proposed parent and child-care centres. While we recognise the potential benefits of a ‘one-stop shop’, we would like to explore the quality assurance mechanisms that would underpin such service provision. Employing at least one early childhood teacher in each centre would be a minimum requirement. Studies that show integrated centres as providing higher quality than other service types attribute this to their substantial employment of highly qualified (and therefore highest paid) staff, these being university qualified teachers, some of whom had postgraduate education qualifications (Sylva et al., 2004).

Other questions we have regarding the operations of these ‘one stop shops’ include:

1. What will the underlying philosophy be?

- a. We suggest an educational philosophy because as we illustrated earlier, early childhood educational centres currently operate under legislation pertaining to education, health and welfare.
- b. We suggest that the Rudd government recognise the pedagogical leadership required for this kind of centre (Cheeseman, 2007). Without a central educational underpinning the value of an integrated service may focus merely on a ‘fix it’ model, rather than one that draws from a strengths-based approach.

2. What will the management structures look like? What models will the government deploy?

- a. We suggest education is integral to the structure and operation of the centres.
- b. We suggest that a University trained early childhood teacher is employed in the role of overall manager with the same status and pay parity as a school principle (such as Directors in early childhood education in South Australia). In addition to education, university qualified early childhood teachers have broad knowledge of health and well being issues for children and families

3. What level of qualifications of staff will be required?

- a. We suggest that in the early childhood centres all staff are qualified and that teaching positions are occupied by 4 year university trained teachers

ALP use of language: The education and care divide

We are concerned that Labor may be misunderstanding the role of curriculum and early learning in early childhood educational centres and only associating early learning with preschools and children four and five years of age. For example, Labor’s Plan for High Quality Child Care states “it is critical that governments show leadership to ensure that high quality child care and early learning environments are in place for our children” (p.1). There seems to be an assumption here that education and early learning do not take place in child care centres. We maintain that long day care, especially in New South Wales, ought to be recognised as sites of education (and care implicitly) for children birth to five years. We suggest, therefore, that Labor consistently use the term “early childhood education” in its policy statement, and “early childhood education centre” as sites of early education.

ALP use of language: ‘Teachers’, ‘educators’, ‘child care professionals’ and ‘child care workers’

Greater consistency in language is needed here. For example, on p.8, it is unclear who is meant by “early childhood educators”. Moreover, this page refers to “child care workers”, “early childhood educators”, and “child care professionals”. We are unclear why “early childhood teachers” is not used.

Research consistently shows that early childhood teachers significantly increase the quality of educational experience. Therefore, the focus of the terminology should be on the teacher, while all other terminology should indicate the centrality of the early childhood teacher in the ECE Centre. In the primary school system, teachers and teacher’s aides are terms used to describe the positions in the classroom to indicate the pedagogical expertise of the teacher. Therefore, we suggest consistent usage of three terms: ‘early childhood teacher’ for staff with a university teaching qualification degree; ‘early childhood diploma assistant’ for staff with a TAFE qualification; and ‘early childhood assistant’ for staff with no formal early childhood qualifications.

Proposed Consultation

Labor asserts that development of its Plan for ECEC will involve consultation with the sector. **Are you able to elaborate on the consultation planned for the development of the Early Years Learning Framework and national quality standards?** We look forward to ongoing consultation processes that demonstrate transparency and accountability with all early childhood stakeholders.



2006 Census data

A key underpinning of quality research is usage of up to date data. **Can you advise when the 2006 Australian Government Census of Child Care Services will be released?**

The future of early childhood education in Australia

New Zealand's *Pathways to the Future* document sets out a ten year plan for early childhood education. A similar plan would be a step forward for the early childhood field in Australia to improve collaboration and cohesion in the sector and raise quality standards. Such a way forward provides Labor with an opportunity to take more of the leadership role the Plan for High Quality makes clear Labor is keen to take. The *Pathways to the Future* document can be downloaded from: http://www.minedu.govt.nz/web/downloadable/dl7648_v1/english.plan.art.pdf

We look forward to meeting with you on June 2nd to discuss our feedback, to hear more about Labor's plans to implement policies geared towards high quality education and care for children, and to establish a working relationship where we can collaboratively work towards achieving higher quality standards of care and education for our children.

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Useful Journal Websites

The following journals are three of the leading Australian and International early childhood Journals that give excellent examples of the most current, innovative and inclusive approaches to education. We would encourage your office to subscribe to these journals as a way to connect the innovation of ALP policy to early childhood research.

International Journal of Equity and Innovation in Early Childhood (IJEIEC)

Edited by Professor Glenda MacNaughton, University of Melbourne (Vic)

<http://www.edfac.unimelb.edu.au/ceiec/members/IJEIEC/index.html>

Contemporary Issues in Early Childhood (CIEC)

Edited by Professor Sue Grieshaber, Queensland University of Technology (Qld) and Professor Nicola Yelland, Victoria University (Vic)

<http://www.words.co.uk/ceic/>

Australian Journal of Early Childhood (AJEC)

Edited by Professor Marilyn Flear Professor, Monash University (Vic) and Co-Edited by Associate Professor Margaret Sims Edith Cowan University (WA)

http://www.earlychildhoodaustralia.org.au/australian_journal_of_early_childhood/about_aje.html