



# Feedback on the Royal Commission Interim Report on 3-year-old Preschool for South Australia

Submission to the Commission

May 30, 2023

## Introduction

The South Australian Committee of Early Childhood Australia (ECA SA) welcomes the opportunity to provide feedback on the Royal Commission's Interim Report on 3-year-old Preschool for South Australia. This feedback builds on our earlier submission to the commission, our participation in roundtable discussions and the research report on quality preschool programs across different settings recently submitted by ECA. We have organised feedback around key themes identified in the Interim Report and referenced specific recommendations or pages where appropriate.

## Fairness and Equity

ECA SA welcomes the proposed goal of 'fairness' where the system will support equity for children and families, providing additional hours and supports where appropriate. It is also important that preschools across the diversity of settings are funded equitably. Some settings may need more funding than others, particularly if the learning environments do not currently meet national quality standards and/or there are barriers to recruiting staff or engaging families. Some services may need to include transport to/from preschool; others may need the support of a family support workers to assist families to navigate service systems. Long Day Care settings will need more support to offer competitive wages for Early Childhood Teachers and will need funding support to offer fees in line with Department of Education Preschools. These are factors that warrant further consideration when developing funding models capable of delivering fairness.

The recommendations regarding universal 3-year-old preschool through a mix of delivery models appears to support the status quo (i.e. 70% of children in long day care, 24% in government preschool, 5% in integrated services). However, ECA SA believes that there needs to be a substantial increase in investment by the SA Government, with additional recurrent funding by the Federal Government, to increase access to universal and integrated programs - particularly for families in diverse locations.

## Quality and Learning Outcomes

ECA is strongly committed to quality in preschool programs, and we support the proposal that all programs be designed to reach or exceed current quality benchmarks and measurably improve learning outcomes. However, there is a need for further dialogue on how outcomes will be measured. The prospect of standardised testing for all children raises significant concern with a high proportion of our members expressing objections to whole of cohort norm-based testing.

The proposal that formative assessment tools will be provided to teachers and educators as part of the preschool outcomes measure, to enable them to support a child's progress and engage in a process of reflection and adjustment (Recommendation 3, p 93) gives rise to questions about respect for teacher competency and existing capability for assessing children's progress through pedagogical documentation and screeners where necessary. The use of assessment tools relies on the support of the profession and needs further consultation. The role and expertise of registered teachers and other educators as well as allied health professions needs to be considered. We suggest, the Royal Commission recommendations careful consideration regarding proposals for how teachers time should be funded and what purposes it should be utilised for.

There is a risk that normative based testing in preschool will impact on learning design and take away from individualised curriculum planning and implementation. However, appropriate CAFHS and other diagnostic testing with referral and access to appropriate services, as has been successfully implemented in other jurisdictions may provide a way forward. We have concerns about the cutbacks in CAFHS in SA and access to other forms of Early Intervention. In many situations, teachers are being asked to do more of the work that would have previously been done by allied health professionals. Greater access to support of services for screening and testing followed by access to services is strongly recommended.

There is also a concern that the report implies that teachers should make decisions about children based on data alone. While data is important, teaching is a profession based on relationships and the wellbeing of the individual, caution needs to be taken when viewing data in isolation. We are concerned by the heavy focus on 'developmental outcomes' throughout the paper (see for example p 56 which refers to 'measuring children' \_). While having some key milestones along a development trajectory may be helpful, it is also important to also recognize diversity and allow for a broad range of development. We do not want checklists for achievement leading to deficit conversations. This contradicts the constructivist philosophy and the Early Years Learning Framework (V2) belief statement that formative assessments capture 'moments in time' and children do not develop in a linear way.

There is a risk that we create an expectation amongst parents that preschool is a destination of outcomes and abilities rather than a journey in which the focus is on strength-based experiences and the development of the whole child. The implications for inclusivity, diversity of ability and cultural, linguistically responsive pedagogy need to be carefully considered. Differentiation and individualized planning provide the greatest benefits when registered teachers and educators understand children's holistic development. Norm based testing can easily lead to a deficit and fearful approach by teachers as many educators postulate has occurred with NAPLAN. Observation based pedagogical documentation with screeners and other developmental testing as required on an individual bases

offers greater alignment with EYLF v2 curriculum and pedagogy. It is particularly important to be careful about defining outcomes based on normative testing with 3-year-old children, it is too early to be 'preparing children for school' it is also unrealistic and developmentally inappropriate to expect significant self-regulation in children at this age.

To achieve positive outcomes for 3-year-old preschool, it is imperative to highlight the importance of working with children and families utilising a strength based holistic approach to understanding child development. Integrated approaches in South Australia such as Children's Centres for Early Childhood Development and Parenting, The Gowrie and various community development programs are examples to be considered. The Early Years Strategy identifies working with children and the community during the first 1000 days as an essential component, it continues to be equally important in the preschool age group.

### Professional Learning on Child Development

ECA recognises and welcomes the proposal that all educators and teachers be given access to professional learning on early child development with a focus on broadening their understanding of the range of capabilities and brain development of three-and-four-year-old children. We also support the proposal for funded professional learning and planning time (Recommendation 25). However, we caution against assuming that all teachers and educators need the same professional learning, or that early childhood development is the best use of professional learning resources. (Recommendation 8, p93). There is an 'opportunity cost' with professional development – individuals and services have limited time and funds available so if teachers do one form of professional development, they are giving up the opportunity to do another. It is essential that professionals have agency in the training they choose to do and a breadth/depth of training options available to them within paid work time. We also highlight the value of whole team learning to strengthen improvements in practice at the service and system level, beyond individual performance.

### Curriculum Materials

While we support giving teachers access to evidence-based tools to improve pedagogical approaches (Recommendation 6) we are concerned about the proposed 'specialised curriculum materials for three-and-four-year-old's' (Recommendation 7). This has raised questions regarding the risk of didactic approaches rather than play based and inquiry-based learning. It is fundamentally important that tools provided to early childhood teachers are based on developmentally appropriate pedagogy. The Early Years Learning Framework is based on clear data and research informed, it identifies the best pedagogical practices. Additional materials such as the SA Preschool Numeracy and Literacy Indicators (which supports the EYLF for 4-year-old preschool) are widely used and valued – resources that augment but do not override pedagogical approaches are needed. Any data collection (2e) should not take away from service provision, it needs to be fully funded.

More specifically, there is a concern that the statement that *"there is no clear evidence about the optimal amount of time, the best program configuration, or the most appropriate pedagogical approach, meaning the methods and practices used by the early childhood teacher, for different cohorts of children"* (p 14) represents a deficit view of the profession and ignores the rigor of the EYLF V2. It is suggested that this be rephrased to *'more support, professional education and*

*discussion needs to occur about pedagogical practises".* The EYLF states that the children are the curriculum – if we have age-based expectations this appears inconsistent with this philosophy.

## Choice & Inclusion

The interim report is unclear whether families are to be offered choices – for example, the choice to send children to a Government Funded Preschool. ECA SA strongly recommend that families do have choice.

The reference to developmental checks ensuring that children receive the right support at the right time of development (p 20) fails to acknowledge the current situation regarding long waiting lists for both assessment and support services such as allied health. It is not uncommon for children to wait 2 years for assessments for speech delay, developmental delay or neuro diversity. Acknowledging this is important. It is also important to understand that early childhood services are supporting a higher proportion of children with additional or divergent needs and have advocated strongly for more inclusion support.

In addition to Good-start and Better-start models (p39), the Department of Education Children's Centres for Early Childhood Development and Parenting (Children's Centres) were designed with purpose and space to provide community programs for parenting and playgroups as well as consultation rooms to provide space for other services such as CAFHS, speech pathology, psychology, social work on a part time basis to support families. Comparatively speaking the cost would be low, for the Department of Education to invest in fully funding these types of services to be present in all Children's Centres and similar sites with adequate space such as Lady Gowrie Child Centre.

It is good to see an acknowledgement of the importance of multi-disciplinary approaches and it is suggested that the report could be more explicit about the long-term benefits of addressing some developmental issues and concerns early, avoiding the need for more expensive interventions down the track and reducing the risk of children experiencing significant challenges in their education journey. We would also like to see greater emphasis on intensive service models such as the Briars and inclusive integrated programs provided in Inclusive Preschool Programs such as Tinyeri and 8 others across the state and Culturally Inclusive Children's Centres for Early Childhood Development and Parenting such as Taikurrendi. This requires specialist staff and higher staff: child ratios. Building a funding model that considers the additional effort required to connect children and families to broader community supports is a positive step towards recognising the value of ECEC setting in their community. *Please also refer to the comments previously mentioned in paragraph two.*

## System Thinking

ECA supports the adoption of a systems approach in which sharing child information, data and experiences across early childhood, home and community settings is prioritised. This has the potential to strengthen responses to the needs of children and families – however, it is important that there is a central focus on the child in this, the benefits must be accrued to children rather than services or agencies.

We are concerned that the interim report lacks an acknowledgement of the importance of the home learning environment and parent capability. There the potential to substantially influence this but it relies on getting the mix of services and supports right. A wider scope of programs such as

supported playgroups for example: South Australia's Learning Together Communities supported playgroups, parent support programs such as Circle of Security Parenting and Marte Meo techniques, community engagement could be included in the 'system'. Playgroup SA also has valuable resources to support families. Supported Playgroups are the preferred model of ECA SA committee members, to allow for cultural, linguistic, neurodiversity and developmental diversity. Many families in this category say they will not attend playgroups due to past experiences of rejection to neurodiverse children from other parents when there is no qualified and paid playgroup leader. In some ways SA is well placed to be a leader here through the Children's Centres for Early Childhood Development and Parenting and Lady Gowrie Child Centre models. We need to keep building the evidence base through holistic child and family focussed qualitative research and family engagement.

ECA SA also acknowledges the importance of taking the best of new knowledge from around the world and testing and trialling how it could be put into action - learning from others and from each other.

## Workforce Issues

We support the inclusion of teacher registration for a 3-year early childhood education degree (birth to five years) in the first instance as a provisional measure to address the immediate workforce issues. This would need an assurance that it is a provisional measure and recipients must upgrade to a 4-year degree within a set timeline. This is a contentious issue with strong views from members both in favour and against this suggestion. Regional areas on the boundary of states that accept a 3-year early childhood education (birth to 5 years) degree experience increasing challenges because teachers can work on the other side of the border as teachers but not in South Australia. Issues to be considered are the status of early childhood teachers, the pay and conditions of early childhood teachers remaining aligned to primary and secondary teachers, the quality for children and the views of the SA Teacher Registration Board. There has been some discussion that primary, secondary and early childhood degrees could all be 3-year degrees with a 4<sup>th</sup> year master's degree or indentured service arrangement (as occurs with health professionals).

## Leadership

Our members believe it is essential to consider both the employment and development of strong early childhood leaders. We recommend the employment of leaders who hold Early Childhood Teaching (and in the future leadership qualifications) with birth-to-5 experience to lead the curriculum and resource decision making for each 3- and 4-year-old preschool setting. We reiterate our support for this position articulated in the Educators SA submission:

*"Members of the early childhood education sector we spoke to say it is essential to retain early childhood autonomy, professionalism and leadership. This can only be achieved by having designated early years leaders responsible for sites, and a genuine sense of educator agency that have expertise in preschool settings. Furthermore, ensuring that senior policy staff in the Department for Education responsible for the early childhood portfolio responsibilities have early childhood qualifications and experience is essential. Fraser Mustard recommended that the SA Government "should take steps to close this gap in understanding in its public service" (2008, p. 24)."*

## Conclusion

ECA SA members thank the Commissioner, The Honourable Julia Gillard, for the opportunity to contribute to the Royal Commission. We look forward to further opportunities for involvement and contribution during the planning and implementation process.

## About Us

Early Childhood Australia (ECA) is a not-for-profit, membership-based organisation that was first incorporated in 1938. Our membership includes early childhood professionals, services, schools and organisations that share a commitment to the rights and wellbeing of young children.

ECA's vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school. Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight. ECA particularly acknowledges the rights of Aboriginal and Torres Strait Islander children and their families and the past and current injustices and realities for them around Australia.

Early Childhood Australia SA has 225 members across South Australia. The Executive Committee is organised by an active group of 12 Early Childhood professionals who volunteer their time to advocate for young children and families and provide leadership in the early childhood education and care profession. The committee includes members from the community and various organisations, including the education, care, TAFE, University, Government, private and community sectors.

As South Australian representatives of a peak early childhood organisation, government and non-government agencies seek advice from our committee to contribute to and comment on, early childhood issues and policies that affect young children and their families in South Australia. We are represented on 14 boards and committees. Our priorities are growing early childhood leadership and supporting early childhood education services to strengthen their quality and advocacy on key issues, including reconciliation and social equality for children and families at risk of disadvantage.

We are deeply committed to First Nations Children. The ECA SA Executive Committee members are actively involved in consultation and advocacy, independently and with our national organisation and other South Australian organisations.

Find out more at: [www.earlychildhoodaustralia.org.au](http://www.earlychildhoodaustralia.org.au)

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