

Position Paper

Lowering of the school age to 3.5 years



Australian Childcare Alliance
Tasmania

August 2017

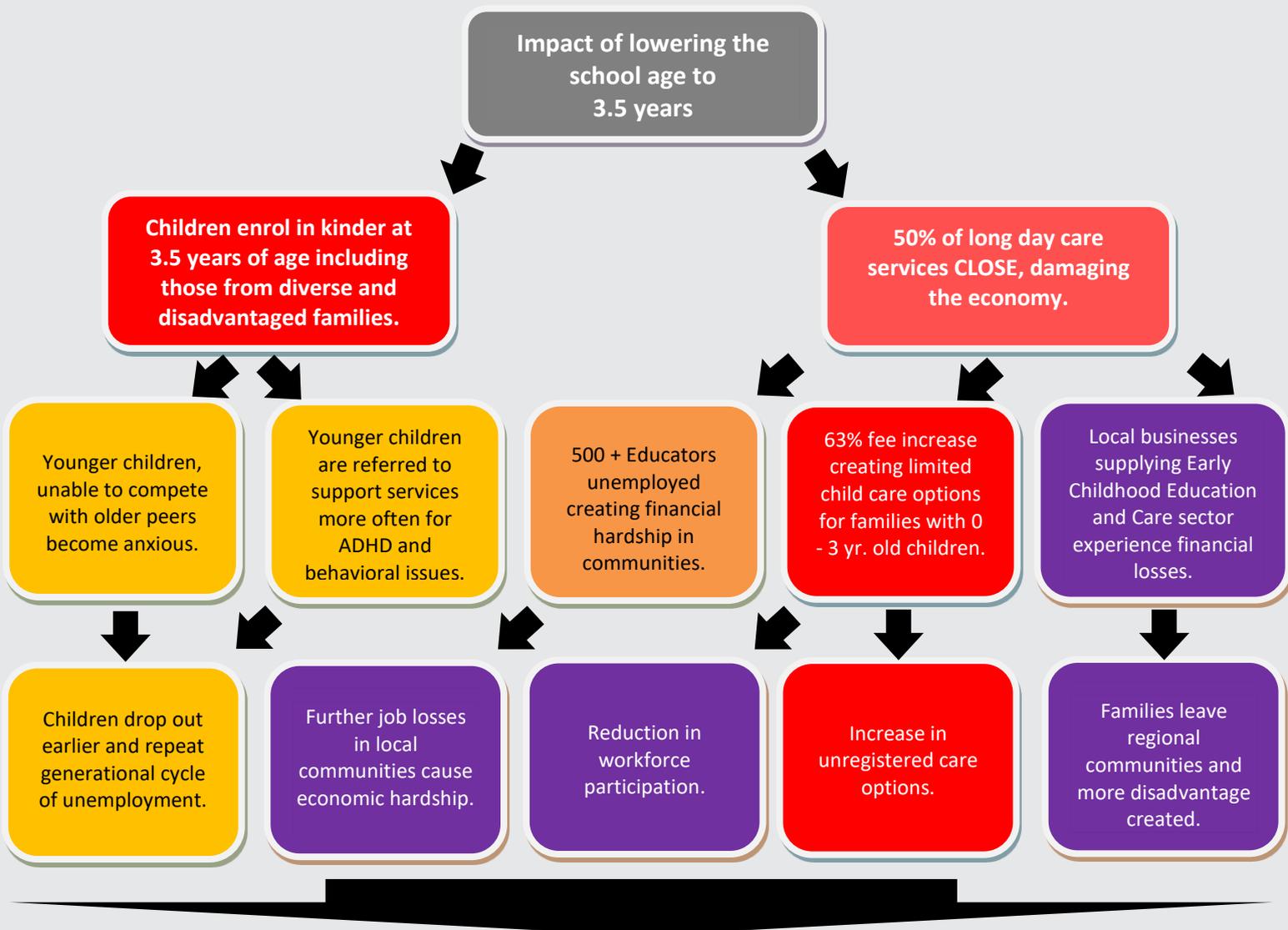


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ACA Tasmania Position Summary



Reject Sections 8 & 9 of the Education Act 2016

- ▶ It's not in the best interests of children from an education and care perspective ■
- ▶ It's not in the best interests of families, reducing accessibility and affordability ■
- ▶ It negatively impacts communities, workforce participation and the economy ■
- ▶ Tasmanian long day care (LDC) centres will close due to loss of children and services becoming unaffordable for families ■
- ▶ It will create major job losses for over 500 Early Childhood Education and Care (ECEC) educators ■

Introduction

As a national peak body in the Australian Early Childhood Education and Care (ECEC) sector, the Australian Childcare Alliance (ACA) represents more than 2,500 members (long day care service providers) and approximately 360,000 families throughout Australia.

Our mission

To lead policy and representation, by fostering collaboration, knowledge sharing and communication.

Our vision

To be the voice of and to support service providers in the provision of high quality, affordable, sustainable and accessible early childhood education and care.



ACA Tasmania was formed in March 2017, with approval from the ACA National Executive Committee (Board).

Our membership has grown quickly in a short time, with over 40 new members from across both the community and private sector.

This position paper has been developed in collaboration with Tasmanian Long Day Care (LDC) service providers in response to the Tasmanian Government's proposal to lower the age that children commence their education in a school environment to 3.5 years.

Our goal over time is to continue to embed ACA Tasmania as a key stakeholder in the Tasmanian ECEC sector.



Background

The Education Act 2016

In November 2016, the Education Act 2016 (the Act) was passed by the Tasmanian House of Assembly. The Act included reference to lowering the school age for children in Tasmania to 3.5 years of age. In accordance with the Act, the Minister for Education and Training is required to make orders by 1 September 2017 prior to clauses 8 and 9 being enacted.

ACA Tasmania has significant social and economic concerns regarding the proposed policy change to lower the school starting age, notably that:

1. It's not in the best interests of children developmentally, psychologically and educationally
2. It will threaten the viability of LDC service providers (businesses)
3. It will create affordability, access and engagement issues for parents using LDC, effecting employment
4. It will eliminate employment opportunities for many LDC sector staff
5. It will detrimentally impact local communities across Tasmania and the economy
6. The consultation process to date has been inadequate
7. There has been significant adverse community and ECEC sector feedback on the proposal.

The Education and Training Minister has several obligations under the Act centered around sector consultation. Prior to making any such order, the Minister must seek and consider a written implementation report, as well as recommendations from the Secretary of the Department of Education. These recommendations must consider the social and economic impact of sections 8 and 9 of the Act on the Tasmanian ECEC sector, Tasmanian children and their families. The order(s) and report must also be tabled in both Houses of Parliament, with Parliament having the power to disallow the order(s).

Member feedback from Tasmanian LDC service providers has revealed a high degree of concern regarding inadequate sector consultation. More recently, ACA Tasmania met with the Minister for Education and attempted to consult with the Secretary of the Department of Education regarding input to their reports.

The interactions with the Secretary have unfortunately reinforced the sector's experience of poor consultation. We have been particularly disappointed thus far, in the willingness to discuss and negotiate viable solutions, which remain in the best interests of Tasmanian families and children. Based on ACA Tasmania's engagement with the LDC sector and the overwhelming evidence against the proposed policy change, ACA Tasmania remains firm in our stance - **Sections 8 & 9 of the Education Act 2016 should not be allowed to progress through Parliament.**

The Act goes against the best practice academic research from Australia and around the world. This research demonstrates that younger is not better when it comes to starting school and does not give children any academic advantage - in fact it can do the opposite. Mr. David Whitebread (UK developmental cognitive psychologist and early years specialist) was quoted as follows: **"The empirical evidence is that children who have a longer period of play-based early childhood education that goes on to age six or seven, finish up with a whole range of clear advantages in the long term. Academically they do better and they experience more emotional wellbeing."** (1)

Moreover, the proposed policy will have a significant adverse impact on Tasmanian families, communities, and service providers, damaging an already fragile economy in Tasmania.

Background

National Context

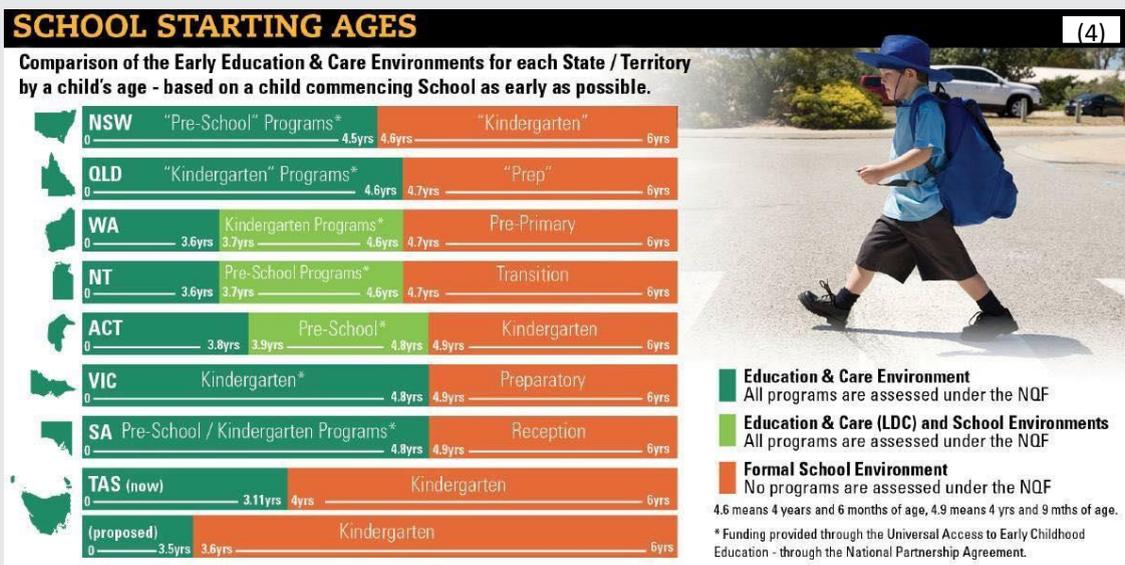
It is important to contextualise the proposed policy issue within the broader national perspective. Clouding any debate in this area is the fact that a nationally consistent school starting age has not yet been established.

In terms of Tasmania's current school system there are strong arguments to support that Tasmania is currently best positioned with a child's entry into formal schooling (Prep) after the age of 5. Whilst this is still young by comparison with many European and Scandinavian countries, many professionals and educators in the sector would argue that this age would be preferable around the country.

Variable terminology and settings across States in Australia causes confusion (see table below). The obvious difference being Tasmania's preschool programs are funded under the Universal Access Partnership Agreement. In Tasmania, this is exclusively provided in a formal school environment and is not assessed under the National Quality Standard (NQS). This confusion and lack of national consistency leads to a focus on compulsory starting ages.

According to the relevant State legislative requirements, Tasmania currently requires children to be enrolled in their first year of full time school either earlier, or in line with all other states and territories except Western Australia. If Tasmania's compulsory school age is reduced as proposed, Tasmania will be in line with only Western Australia and children will be required to be in full time school six months earlier than most of the country.

The established research in relation to pre-school refers to the need in Australia to add a second year of pre-school, broadly at around the age of 3 at a rate of 15 hours per week, to improve short and long term educational outcomes for children (2). The quality and type of the program is vitally important as well as the quality of the interactions (3).



2. Fox, S & Geddes, M - Mitchell Institute Report: "Two Years Are Better Than One" (2016)
3. Professor Taylor, C - University of Melbourne E4Kids longitudinal study (2016)
4. The Examiner – School starting age changes in Tasmania versus Australia (2016)

The proposed changes in Tasmania's new legislation do not appear to have considered the evidence in that they are not providing for a second year of pre-school for children, before their seven years of primary schooling.

In fact, should this change progress and the recommendation for two years of pre-school be considered into the future, adding a second year of pre-school would mean that children start their early learning in this system at 2.5 years of age. This outcome is of course unreasonable and exposes the flaw in this ill-considered policy proposal.

Whilst no state has committed funds to establishing a second year of funded pre-school, it is worth considering how pre-school/kindergarten is provided through various service delivery models across the country.

With the National Quality Framework's (NQF) implementation in 2012 we now have an ECEC sector that is assessed against quality standards that were implemented by the Federal Government in 2012.

In this context, many states now recognise the benefits of utilising a mixed market service delivery model in the years before school. A warning for Tasmania is evident in the experience of New South Wales (NSW). NSW had previously failed to increase pre-school participation in ECEC due to restricting their subsidies at first to state based 'preschools' (9am to 3pm formal style schooling).

NSW found that children did not significantly increase participation in ECEC, as it did not suit the needs of working families. Rather, after the completion of the Brennan Report (5), they expanded this funding to include LDC services, which have trained early childhood teachers and a comprehensive educational program, and subsidised the cost to families to attend these services. NSW has subsequently experienced an increase in participation in ECEC.

The most successful state at supporting participation in ECEC has been Victoria. The Kennett Government recognised in the late 1990's that LDC services were a wonderful opportunity to engage more children in pre-school. They subsequently established a state government funded integrated kindergarten program to complement the more traditional kindergarten system.

This funding was contingent on children having access to a program delivered by a tertiary trained early childhood teacher for a set number of hours a week. This allocation of hours now sits at 15 hours per week and the funding has been in place for almost 20 years. This funding remains available to all provider types.

There is no reason to suggest that Tasmania could not implement such a system for 3-year old's at significantly less cost to the tax payer and deliver on its aim of improving outcomes for children. This would allow Tasmania to promote its world class ECEC services, deliver a second year of pre-school, and result in improved short and long-term outcomes for children and therefore long term economic benefit to the state as the evidence suggests (6). This could all be done without the need for lowering the school age and without the need for investment in new facilities and significant capital expense to the State.

It should be noted that Tasmanian Kindergarten programs have not been required to be assessed under the NQF unlike the rest of the Country. There is also a high level of concern that Kindergarten programs do not and will not be able to meet the NQF requirements without significant alterations to both practice and facilities. There is also a high level of concern that Kindergarten programs do not and will not be able to meet the NQF requirements without significant alterations to both practice and facilities. On this basis alone the existing programs available through the current LDC Sector in Tasmania are clearly more appropriate and prepared to implement enhanced programs if Tasmanian tax payer funding is available to extend universal access to younger children.

It is also an option that the Tasmanian ECEC is left unchanged, again at no expense to the State.

5. [Brennan, D - Review of NSW Government Funding for Early Childhood Education \(2012\)](#)

6. [Professor Heckman, J – The Heckman Equation \(2012\)](#)

Impact Assessment

Lowering the school age will adversely impact children, families, the community and the economy

The current proposal to lower the age of starting school (Prep) for Tasmania's children appears, at face value, to have been conceived based on international studies that show engaging in high quality ECEC brings about benefits to children and communities. However, the Tasmanian Government's proposal directly conflicts with the volumes of best practice research in this area.

Research demonstrates the need to increase participation in high quality LDC programs, where the emphasis is on play based experiential learning in an age appropriate environment with no timetables or restrictions. Increasing participation in high quality ECEC is one of the most effective ways that government can address the inequities faced by children from vulnerable and disadvantaged families (7). A range of Australian and International studies have quantified that increased participation in ECEC has positive outcomes on the Gross Domestic Product in the short term and long term (8, 9, 10).

Impact on Children

Children at this age still need to sleep during the day, quite often still need nappies, and certainly require toileting and facilities (chairs, tables etc.) that are of a different height and more accessible than those of their school aged peers (11). Children require freedom of movement and the ability to learn at a pace that is suitable to their intellectual development, not stencils and formal learning curriculums.

Young children require flexible day time schedules which adapt to their changing needs – not bells telling them when to line up and when to come inside. This is even more important for children with additional and diverse needs, including those with unregulated behaviours. Children need an unstructured environment where trained educators can work to provide tailored support and engagement.

Mr. Steve Biddulph AM and Associate Professor Kay Margetts have produced relevant research that demonstrates the negative emotional impact on children of being placed in environments where they are expected to perform above their developmental capacity (12, 13). A more detailed explanation of the immense importance of play-based education is provided in Appendix 1.

For optimum emotional wellbeing, young children require continuity of care not being taken to one facility (Before school care) only to be transferred to another facility (School) before being delivered to a third environment (After school care) if their parents are working (13). In addition to these multiple transitions throughout the day, they will be placed in environments with limited adult supervision (often school halls etc.) with children as old as 12. This is unacceptable and conflicts with the core elements of the NQF.

The NQF was introduced in 2012 and is based on best practice evidence from Australia and Internationally. It outlines how to achieve high quality early childhood education and care programs (15). The NQF sets the standards for staff qualifications and ratios, it provides detailed descriptions of what an experiential play-based learning environment looks like, and outlines a comprehensive curriculum framework. Critically, it is an outcome-based framework that recognises the need for contextual education based on individual children's needs. Moreover, all ECEC services are independently assessed for quality across Australia.

7. [Professor Whitebread, D - Sydney Morning Herald \(26 January 2014\)](#)

8. [Professor Heckman, J – The Heckman Equation \(2012\)](#)

9. [PwC - Putting a value on early childhood education and care in Australia \(2014\)](#)

10. [Lynch, R & Vaghul, K – The Benefits and Costs of Investing in Early Childhood Education \(2015\)](#)

11. [The Advertiser – Four too young for some kids to start school \(2016\)](#)

12. [Biddulph, S – Raising Boys \(1997\)](#)

13. [Ass Professor Margetts, K – The Sydney Morning Herald \(2012\)](#)

14. [Bredenkamp, S & Coople, C - Developmentally Appropriate Practice in Early Childhood Education \(2009\)](#)

15. [National Quality Framework Overview \(2016\)](#)

To this point, the Minister for Education and Training has failed to confirm that the policy change will align with the NQF. During a Parliamentary session on this matter, the Minister has stated only that the policy will “mirror, as far as is practical, the standards.” It is concerning that the Minister plans to move away from care ratios specified in the NQF, moving from a 1:10 ratio to a 2:25 ratio for children aged over 36 months. A failure to commit to the NQF sets a dangerous ECEC precedent, particularly if ratios are diminished and children receive less personalised nurturing programs.

It is critical to note that while the school starting age is voluntary, most parents will read this opportunity as a guide to school readiness. This decision will be reached in the absence of appropriate feedback and assessment of their child’s developmental needs and actual readiness for school. The change in policy direction to make it non-compulsory presents significant risks. Not only will this confuse parents, but age gaps of up to 18 months could be evident in a child’s first year of schooling. The potential for composite classes in smaller schools could mean an age gap of up to three years. Not only is this detrimental for children, but the pressure on teachers unfamiliar and not trained with this age group is going to be compounded.

Impact on Vulnerable Children

The Tasmanian government has claimed that lowering the school age will somehow improve outcomes for children from disadvantaged backgrounds. This is simply not the case and in fact, research would suggest that the opposite is true. Being able to respond to children with special needs individually is achievable in LDC through building trusting and positive relationships with families and children.

The Mitchell Institute has prioritised attendance in ECEC to address inequity stating: “An overly structured, academic focus in preschool can prevent children from developing the social and emotional skills they need...lowering the school age would pull children out of this system and put them into schools - in essence, doing the opposite of what the research indicates is in their best interests.” (16)

Nobel Prize winning University of Chicago Economics Professor James Heckman has been studying the massive benefits of investment in high quality Early Childhood Education, particularly for children from vulnerable and disadvantaged background.

Heckman’s research and analysis shows that the “best way to reduce deficits is to invest in quality early childhood development for disadvantaged children. It creates better education, health, social and economic outcomes that increase revenue and reduce the need for costly social spending.” Heckman’s research shows that “high-quality birth-to-five programs for disadvantaged children can deliver a 13% per year return on investment”. (17)

With regards to affordability, the Federal Government’s Jobs for Families funding package, to be implemented in 2018, has to some measure addressed the needs of families from disadvantaged backgrounds attending high quality ECEC. This funding would not be extended to children attending school.

All modelling that has been undertaken to date in LDC points to:

- A significant increase in LDC fees for children in the younger age group
- Reduced participation for children from lower socio-economic groups.

These findings include the Tasmanian Government’s own report by Deloitte (18), as well as data produced by Early Childhood Australia (ECA) and ACA Tasmania.

Lowering the school age will further contribute to inequity, bringing about more disadvantage for children who are already vulnerable and face hardship throughout their education. The lack of Government assurance that the NQF will be applied for this younger cohort is concerning. Experience from Western Australia demonstrates that their school system has unsuccessfully implemented a similar policy with pseudo commitment to the NQF. As a result, children as young as 3.5 years of age are taught in a class-room based environment.

16. Mitchell, S – Two Years are Better than one (2016)

17. Professor Heckman, J – The Heckman Equation (2012)

18. Deloitte – Modelling Review: Impact of Lowering the School Age (2016)

Impact on LDC Services

There are 119 LDC services in Tasmania, comprising the dominant ECEC service type for children in the years before they attend primary school (19). Many services, losing their 3.5 years and older aged children, will face financial instability. They will be forced to raise their fees or to close. Critically, the majority of services also report that they are operating at below capacity already.

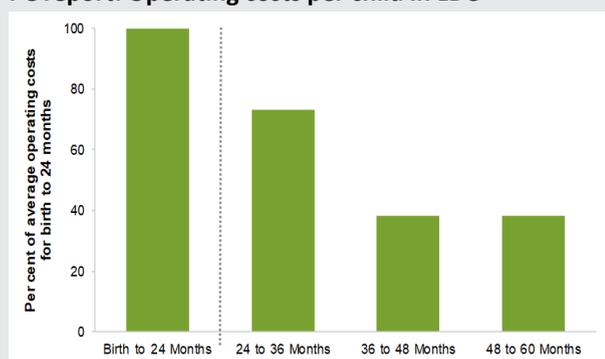
Why will fees increase?

The cost of ECEC service delivery for children under the age of 3 is necessarily higher than those older than 3, as a direct result of the NQS's educator qualifications and ratios. Services cross subsidise this by using economies of scale, which incorporate the older children. Taking away children aged 3.5 and over by moving them into the schooling system means that services will have to increase their fees for younger children to stay viable.

Productivity Commission Evidence

Expenses to deliver LDC to children less than two years of age are more than double that of a child aged three to five years (20). This is because of the higher staff to child ratios for the younger age group.

PC report: Operating costs per child in LDC

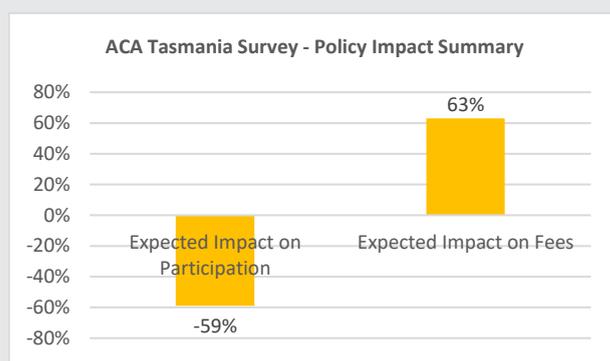


ACA Tasmania Survey Data

ACA Tasmania surveyed 37 different LDC services from both the private and community sector. 3,988 children were enrolled in LDC programs delivered by these 37 providers in the sample week. This represents a sample size of approximately 35% of total Tasmanian enrolments as sourced from the Report on Government Services. ACA Tasmania analysis demonstrates that there will be an immediate reduction of 27% of all attendances. This is detailed further in Appendix 2.

Due to the price elastic nature of LDC, particularly for families with lower incomes, it is inevitable that Tasmania will see a substantial reduction in demand if fees increase significantly. Although our members feel strongly that the impact would be greater, our analysis considers a conservative 25% reduction in participation based on the expected fee increase. Incorporating this further reduction into the analysis, it is estimated that attendances will reduce by an average total of 59%. Our survey data suggests an average fee increase of 63% if the policy is implemented (21).

A detailed extract of the ACA Tasmania survey results is provided in Appendix 2 to this report. A case study on the following page better explains how the proposed changes will affect a small Tasmanian community service.



19. [Report on Government Services Report \(2016\)](#)

20. [Productivity Commission Review \(2015\)](#)

21. [ACA Tasmania Operator Survey \(2017\)](#)

Case Study Example

This Tasmanian service has been operating in Tasmania since 2009. They currently have 32 approved places and their daily fee is \$71. Their current enrolment profile is as follows:

- 7 x 0 - 1 years
- 21 x 1 - 2 years
- 14 x 2 - 3 years
- 16 x 3 - 3.5 years
- 14 x 3.5 - 4 years
- 9 x 4 - 4.9 years
- 4 x 5+ years.

Scenario 1: Costs increase by \$67 to \$138 per day.

This will be the result if 3.5 years and older aged children are withdrawn from attending and the service is able to replace these children with other 0-3-year-old children.

Scenario 2: Costs increase by \$89 to \$160 per day.

This will be the most likely outcome as this service will be unable to fill these positions due to the small population of their local area.

This scale of fee increase means that many families in this area will simply be unable to afford care and will withdraw their children from high quality ECEC. Additionally many families will withdraw themselves from participating in the workforce making it more difficult to recruit and retain employees to essential positions within this community. Additionally, the local economy will be damaged.

Forecast outcome = Service closure and negative impacts on Tasmanian children, families, the community and the economy.



Too early for our children and too late for our Child Care Centres

The Liberal State Government plans to lower the school starting age to 3.5 years old

- ❌ Research proves this is TOO YOUNG and affects children's emotional development*
- ❌ This decision will close half of Tasmanian Child Care Centres, reducing access to child care & increasing fees significantly

VISIT [@ACA-Tasmania](#) or [#acatas](#) TO FIND OUT HOW YOU CAN HELP STOP THIS CHILD CARE CRISIS

Australian Childcare Alliance Tasmania

*Biddulph, S. (2016, September, 9). Too Much Too Young is Dangerous, *The Mercury*

Impact on Families

Significant fee increases are unacceptable for Tasmanian families, as this will compromise affordability and accessibility. Particularly regional Tasmania is significantly affected by low income levels (22). ACA Tasmania's service operator survey confirmed this fact, with 26% of families receiving the maximum child-care benefit currently (100%+) and a further 17% of families receiving 75% to 100%.

Moreover, 27% of services surveyed by ACA Tasmania received funding under the Community Support Program (CSP). The CSP is a program designed to support the unique requirements of disadvantaged, regional and remote communities. Making it cost prohibitive for these families to access LDC services is unacceptable.

It also poses a real risk, as a follow on, that parent engagement will be less in a school environment than in LDC. For example, there is daily interaction with parents and LDC service educators and providers. This promotes strong family and community ties and open discussions on the child's progression in early childhood education and readiness for school.

It will also leave working parents in a difficult position if services are rendered unviable and forced to close for the thirteen weeks a year during school holidays (with limited or no vacation care available).

Impact on Staff

The adverse impact on families and service providers will detrimentally impact the employment prospects for LDC educators. Data generated by Early Childhood Australia (ECA) highlights that around 500 early childhood educators will lose their jobs (23). Most of these Educators have directly benefited from \$300M recently invested by the Federal Government's LDC Professional Development Programme Fund. Aside from this waste of Federal funding, these Educator job losses will have a negative flow on effect on local communities. Future career choices for students wanting a career in ECEC will also be compromised.

Impact on the Community

The economic flow on to the community of these changes would be crippling. The Organisation for Economic Cooperation and Development (OECD) panel data studies by Jaumotte (24) and Thevenon (25) found that access to publicly funded childcare services for young children appeared to stimulate full-time workforce participation of women aged 25 to 54 years. The Productivity Commission found that large changes in prices will have a material impact on workforce participation (26).

Data sourced from ECA highlights that entire regions will be left without access to LDC services. For example, there will be no services between Brighton and Launceston (27). Moreover, local small businesses that work with these services (grocers, cleaners, suppliers) would have a downturn in business. It is concerning that the Secretary of the Department of Education was quoted at an ECA event in response to a question on this issue that "businesses close every day".

The lack of community support for the proposed changes was evident in a recent newspaper poll by the Advocate. As at 31 July, this survey highlighted that 94.9% of the 1,262 respondents were against the proposed policy change (28). Parents, unable to access affordable LDC, will withdraw from participation in employment and education opportunities.

The increase in fees necessary to accommodate this change will result in LDC services being accessible by only those that can afford it, creating an elitist outcome. The new Jobs for Families child-care subsidy system is designed to reduce out of pocket expenses for families. Unfortunately, the proposed changes in Tasmania will mean that Tasmanian families will have much higher out of pocket expenses than comparable families in other States.

22. [ABC Radio National - The Bush Telegraph \(2014\)](#)

23. [Early Childhood Australia – Fact Sheet \(2016\)](#)

24. [Jaumotte, F - Female Labour Force Participation \(2004\)](#)

25. [Thevenon, O - Drivers of Female Labour Force Participation \(2013\)](#)

26. [Productivity Commission Report into Childcare and Early Childhood Learning](#)

27. [Early Childhood Australia – Fact Sheet \(2016\)](#)

28. [Landsdown, S - The Advocate \(2017\)](#)

Impact Assessment

Inadequate Consultation

ACA Tasmania members are unanimous in their feedback that the consultation process to date with service providers has been poor. One such example is as follows:

*“I was not aware of any consultation prior to attending an ECA meeting in March 2016, where I was horrified to hear what was proposed and how this would affect our service. I responded to the Regulatory Impact Statement (RIS). I then made a submission and contacted my local MLC and organised a teleconference with the Minister for Education. The Minister continually stated throughout the meeting that “we’ll have to agree to disagree”. After this meeting, I didn’t have any contact from him, only two letters which were not personalised. Nor did the letters address my questions. At my request, I later met with the Secretary of the Department of Education for just over one hour and was told repeatedly that I would “just need to adjust my business model”. The Secretary declined an invitation to tour my service, saying “she was short on time”. I contacted KPMG and requested a site visit and attended an information forum in Burnie. From then the only consultation has been with KPMG at a data collection site visit, which did not consider qualitative information. **I have not been invited to give any feedback to the whole process, despite our community indicating likely closure of all services.**” (27)*

Adverse Community and ECEC Sector Feedback

ACA Tasmania has engaged extensively across the ECEC sector, with 100% of our members (both community and private providers) against the proposed policy change. A petition sent via our Facebook page has generated over 770 negative responses to the proposed change in a matter of weeks. Regular engagement with Early Childhood Australia and United Voice reveals both organisations do not support the proposed policy change.

A National Survey of primary school teachers highlighted overwhelming support for later school starting ages (28). Similarly, a survey of 1,600 teachers, principals and support staff carried out by the Australian Education Union Tasmania Branch showed that 77% were against the move (29).

At the 2016 AGM of the Tasmanian Association of State School Organisations a motion was endorsed to write to the Minister for Education and Training stating the ages for children attending Kindergarten and Prep in Tasmania remain as is. Their motion outlined that the proposed changes will:

- Have a significant negative impact on our schools, staff, children and families
- Put significant additional strain on both school infrastructure and staff; and
- In many cases radically reduce valuable parent-child time during a key developmental period.

Even the families’ voice has been ignored, with no consultation or clear communication strategies. Early childhood experts do not support the proposed change – in fact they are campaigning to raise the school age of children across Australia. Supporting our rejection of the proposed policy is a wide range of academic evidence, samples of which have been provided as Appendix 3 to this report.

Many ECEC stakeholders are incredibly unhappy with the consultation process. Despite the release of the RIS in May 2016, many service providers remained unaware. Furthermore, those few stakeholders selected to take part in this process felt that those initial rounds of consultation were highly managed and skewed toward the result the government was aiming to achieve.

Other services, especially those in regional areas who would be seriously impacted by this legislation, have only had individual interactions with the Department of Education at their request and then told by the Minister for Education and Secretary for Education that they would have to ‘agree to disagree’.

27. ACA Tasmania Operator Survey (2016)

28. Branley, A - ABC News (2016)

29. Australian Education Union - School starting age survey (2016)

The fact that the Tasmanian Government has changed the draft legislation from compulsory to voluntary participation speaks to the backlash over the lowering of the school age and lack of appropriate up-front policy consultation.

During briefings from the sector to the Members of the Legislative Council and in the media the government has repeatedly labelled service providers as 'self-interested'. That is, placing commercial interests above those of their families. This is demeaning and divisive, given entire communities will be affected by their closure.

Since the Education Act was tabled in Parliament in October 2016, KPMG were contracted to complete the report in relation to the social and economic impact of clauses 8 and 9 of the legislation. The feedback on KPMG's consultation has again been poor, with service providers expressing their concerns on regularly being advised to 'adjust their business models'. As all ECEC services have high fixed costs and generally purpose-built facilities this is not realistic or achievable. These sorts of suggestions demonstrated a clear lack of understanding of the LDC sector in terms of the high levels of regulation regarding building design.

Additionally, during the pre-selected sites visits, KPMG consultants collected quantitative data, but were unable to capture the qualitative information, which focused more upon the social implications relating to the implementation of this legislation.

Whilst some services were offered the opportunity to discuss concerns in relation to the implementation directly with the Secretary for Education and Mr. Michael White (consultant), most were excluded from these meetings.

Consultation is a process that should engage a sector proactively and holistically. This includes the wider community, relevant industry, sector specialists and individuals so that input can be offered in relation to developing a suitable solution to problems and contribute to the outcome. This type of proactive and holistic consultation has consistently not occurred.

However, teachers within the public-school system, who will be tasked with managing the complex needs of this younger age group, were obliged to remain silent through the process as part of their employment contracts.

Additionally, parents are largely uninformed of the consequences of this legislation. Disappointingly, pre-eminent authorities in the areas of children's emotional and mental wellbeing such as Mr. Steve Biddulph AM have been discouraged from speaking on this issue publicly, further validating the ECEC sector's concerns about the integrity of the 'consultation' process (30).



Recommendations

Reject Sections 8 & 9 of the Education Act 2016

Considering the overwhelming evidence and serious negative implications for Tasmanian families and children, the detrimental impact on local LDC service providers, communities and economies, plus poor stakeholder consultation, ACA Tasmania believes that: **Sections 8 and 9 of the Education Act 2016 should not be allowed to progress through Parliament.**

Instead, ACA Tasmania recommended that participation and funding for participation in appropriate ECEC settings be made a priority. This might extend to adopting the model on offer in Victoria, where 15 hours of funded kindergarten in LDC has been in place for almost 20 years.

Another option is to simply leave the ECEC sector in Tasmania as it is.

A supportive communication strategy should also be implemented confirming that the policy is abandoned targeted at Tasmanian:

- Families using Early Childhood Education & Care services
- Early Childhood Education and Care Service providers
- Early Childhood Education and Care Staff
- Early Childhood Education and Care stakeholders.
-

**Too much,
too young**

The Liberal State Government plans to lower the school starting age to 3.5 years old

- ❌ Research proves this is **TOO YOUNG** and affects children's emotional development
- ❌ It will **CLOSE** half of Tasmania's Long Day Care Centres, **REDUCING** access to childcare and **INCREASING** fees

LET KIDS BE KIDS. SAY NO TO LOWERING THE SCHOOL STARTING AGE & KEEP TASMANIA'S LONG DAY CARE CENTRES OPEN.

Australian Childcare Alliance
Tasmania

*Biddulph, S. (2016, September 9). Too Much Too Young is Dangerous, *The Mercury*

Appendix 1

High Importance of Play Based Education

ACA Tasmania is concerned that the proposed policy fails to recognise that schools are fundamentally different to LDC. Typical school settings are not play based, though play based learning is at the core of best practice ECEC theory and delivery worldwide. This is why play based principles are embedded in the NQF. As stated previously in the report, there is overwhelming academic research as to the many benefits play offers in relation to children's development (31, 32, 33).

It is the view of ACA Tasmania that the proposed policy change to lower the school starting age to 3.5 years will be significantly detrimental to children. ACA Tasmania recognises the Rights of Children to play as outlined in the United Nations Convention on the Rights of the Child (34). This includes the benefits this offers as a positive strategy to engage children's natural curiosity, spontaneity and develop their disposition for learning (35, 36).

Children's agency, participation and voice is imperative to the co-construction of a strengths-based curriculum which highlights the historical disconnect to a linear, thematic teacher-led curriculum which may be developed months in advance with little participation from children (37, 38, 39).

Predetermined curriculums and assessment processes have been demonstrated to have a detrimental impact on young children (40). Conversely, when play is emergent or is based on children's interests and children's own lines of inquiry it is highly motivating and creates a self-perpetuating enjoyment of learning (41).

As opposed to a school based environment, play based learning is a learner-centered ideology (42). It is not a performance-based model (43). This is a fundamental principle within the Reggio Emilia, Montessori and Froebel approaches commonly used in an ECEC setting. These ideological ECEC models also stand in direct contrast with school based pedagogical practice.

The act of playing or pretending to be someone or something else is manifested from a child's understandings of their relationships or interactions with older peers and adults and their experiences within their environment (44, 45). Play based learning allows children to develop their self-image, perspectives and to practice the skills necessary for the next stage of development (46).

Through play, children can develop their coordination, cognitive, social and communication and emotional regulation prior to entering a more formalised learning environment (47, 48, 49, 50).

Play encourages children to focus and concentrate for longer periods of time, develop organised thought processes, planning and impulse control. These are recognised as executive functions needed for higher education but require practice to develop (51).

By placing young children in a school setting, the play-based learning needs of children will be severely adversely compromised.

31. Biddulph, S – Too Much Too Young is Dangerous, *The Mercury* (2016);
 32. Stegeline, D - Importance of Play in Early Childhood (2005)
 33. Woodhead, M - Changing perspectives on early childhood (2006)
 34. United Nations Convention on the Rights of the Child (1989)
 35. Department of Education, Employment and Workplace Relations (2009)
 36. Sandberg, A & Åriemalm-Hauser, E - The Swedish National Curriculum (2011).
 37. Fleet, A & Patterson, C - Professional Learning in Early Childhood Settings (1998)
 38. Fraser, S - Authentic Childhood: Exploring Reggio Emilia in the classroom (2001)
 39. Bertram, T. and Pascal, C. Early Years Education: International Perspective (2002).
 40. Solar, J & Miller, L – The Struggle for Early Childhood Curricula (2003)

41. Department of Education, Employment and Workplace Relations (2009)
 42. McLachlan, C Fler, M and Edwards, S – Early Childhood Curriculum (2013)
 43. Sellers, K – The Role of Early Childhood Providers in Childhood Obesity (2005)
 44. Vygotsky, L - Play and its role in the Mental development of the Child (1933)
 45. Piaget, J - The Child's Conception of the World (1925)
 46. Bodrova, E & Leong, D - The importance of being playful (2006)
 47. Bodrova, E – Curriculum and play in early childhood (2008)
 48. Robson, S - Self-regulation and metacognition in young children's self-initiated play (2010)
 49. Stegeline, D - Making the Case for Play Policy (2005)
 50. Whitebread, D - Preschool children's social pretend play (2012).
 51. Berk, L & Meyers, I - The Role of Make-Believe Play in the Development of Executive Function (2013).

Appendix 2

ACA Tasmania Survey Analysis

Background

ACA Tasmania rolled out a survey to all Tasmanian LDC services on 29 May 2017, closing on 31 July 2017. The survey consisted of 12 questions focused on the current operating circumstances and attendance patterns for each service, as well as the potential impact of the proposed lowering of the school starting age. The survey data was collected in a de-identified format using SurveyMonkey technology.

Response Rate

Australian Children's Education & Care Quality Authority data suggests that there are 119 LDC services in Tasmania, with an average approved license capacity of 62 places per service. ACA Tasmania received responses from 37 LDC services, representing:

- Over 30% of all Tasmanian services
- 35% of children enrolled in Tasmanian LDC programs (3,988 of 11,312) (ROGS 2016 table 3A.20)

Macro Data Insights

Of the 37 LDC services surveyed:

- 10 services reported receiving the funding under the Community Support Program
- 17 services reported that they also deliver an Out of School Hours Care Program
- 22 services reported being either co-located with or are located very close to a primary school
- 42% of families receive Child Care Benefit at a rate of 75% or higher
- On average, to meet requirements, services spend 77% of their revenue directly on wages

Service Usage Demographics

Parents have choice on how many sessions of ECEC they utilise in a LDC setting. In Tasmania, it is also common for services to offer part day sessions which provides flexibility for families. ACA Tasmania survey data highlighted attendance patterns across all age groups for the 3,988 children within the survey sample. The survey data highlighted that 0-12-month-old children are attending LDC programs for an average of 1.6 full days each week and this attendance increases to 1.93 days each week for children between the ages of 3.5 and 4.5. This attendance then quickly reduces to 0.71 days a week for children who are over the age of 4.5 (children who are also attending Kindergarten).

Key Findings

Using these actual participation rates across all age groups, ACA Tasmania has forecasted that there will be an immediate average reduction of 27% of all attendances, with the number of full day sessions reducing from 6,892 per week to 5,049 full day sessions.

This analysis considers the reduced participation of children when they are also attending school kindergarten programs and the exclusion altogether of the children, which will be then at full time school under the proposal.

Due to the highly price elastic nature of ECEC, particularly for families with lower incomes, it is inevitable that Tasmania will see a significant reduction in participation when a large price rise eventuates.

Although ACA Tasmania members feel strongly that the impact would be greater, ***our analysis considers a conservative 25% reduction in participation when the fee level increases. Based on this price-based retraction in demand, this will equate to a 59% reduction in attendances on average.***

Services that have higher portions of families with lower incomes will see a higher reduction than services with higher portions of higher income families.

On average, survey respondents suggested that a 63% increase in fees would be required to stay viable.

Appendix 3

Supporting Evidence

Academic Research

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Appendix 3

Supporting Evidence (cont.)

Media Articles

[Sydney Morning Herald: Experts warn starting school too young harms learning wellbeing](#)

[Kidspot.com: No wonder some kids are mucking up in class](#)

[Mom.Me: Researchers say there is a right age to start kindergarten](#)

[Twitter: What does early childhood have to do with America's workforce problems](#)

[Huffington Post: Finland education system](#)

[ABC Morning Radio: Children under too much pressure](#)

[Adelaide Now: Four too young](#)

[Sydney Morning Herald: 'Preschool nerves put health at risk'](#)

[New Scientist: 'Too much, too young: Should schooling start at age 7?'](#)

[Sydney Morning Herald: 'What is the right age to start school?'](#)

[The Mercury: 'Talking Point: Too much too young is dangerous' by Steve Biddulph](#)

[New York Times: 'Let the kids learn through play'](#)

[University of Cambridge: Evidence on school starting age](#)

['Moving up the Grades: Relationship between Preschool Model and Later School Success', Rebecca A. Marcon, University of North Florida](#)

['Study finds improved self-regulation in kindergarteners who wait a year to enrol'. Stanford Graduate School of Education](#)



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