



Australian Council of TESOL Associations

RESPONSE TO THE PRODUCTIVITY COMMISSION'S INQUIRY INTO EARLY CHILDHOOD EDUCATION AND CARE

The Australian Council of TESOL Associations (ACTA) welcomes the Inquiry into the ECEC sector in Australia and commends the Commission's draft report for its comprehensive coverage of policy directed to furthering high quality ECEC that is universal, affordable, inclusive and flexible (p. 17). Our particular focus is inclusivity for speakers of languages other than English but we welcome the draft report's analysis that shows the interdependence of these principles in practice.

We warmly endorse the draft report's distinction between universality and uniformity of provision:

Universal, however, does not mean uniform. In a universal system, some form of ECEC would be available to all children regardless of where they live, but the mode of provision could differ depending on location and the needs of children." (p.4).

The following brief comments identify some areas where these principles could be more explicitly adopted in the final report.

Terminology and its implications

As the data in Figure 1 (p. 8) confirms, nearly one-fifth of children in ECEC are from multilingual backgrounds, including in newly arrived refugee families. It is crucially important to recognise both the particular *strengths* and the *needs* of these children and their families. To promote their well-being and achievement, ECEC policy and practices must *explicitly* and *implicitly* support maintaining, developing and building on children's home and community languages wherever possible. In *all* cases, their languages must be seen and used as a positive and necessary foundation in developing children's literacy, together with their oral and written English.¹

At very minimum, we urge the Commission to adopt terminology that consistently acknowledges children's and families' strengths, rather than identifying them with reference to something lacking as, for example, in the outdated "*non-English speaking background*" (p. 8).²

In what follows, we adopt the term "culturally and linguistically diverse" (CALD) children in line with some of the text in the draft report.

¹ It is essential to understand that literacy can be learned in any language. Hence learning *literacy* is not synonymous with learning *English*. Research has demonstrated conclusively that, except in rare cases (e.g. learning Latin), learning literacy is best done on the basis of a language which a child speaks, normally the mother tongue. Learning initial literacy in and through English requires at least some initial proficiency in spoken English.

² We note other terms used in the report, for example: "*culturally and linguistically diverse*" (p. 28), "*language background other than English*" (p. 130).

We commend the Commission for generally ensuring that the words "*language*" and "English" appropriately and when one or the other is intended. See, for example, where the reference is unclear:

One study compared the effects of CBDC on language development between two groups of children, one seeming as though they would have otherwise received FDC, with the other group having parental care as their apparent alternative. These results seemed to suggest that FDC was beneficial for language development, but that CBDC, on average, conferred larger benefits (Berger et al. 2021).

Given ACTA's focus on English, we also use the term learners of "*English as an additional language or dialect*" (EAL/D) when referring specifically to learning needs in relation to English.

Extending this point further, we suggest that a list of abbreviations and definitions would greatly assist the reader.

Further, although it is convenient to name CALD children as one cohort, in reality their experiences, including their linguistic skills and knowledge, vary considerably. We urge the Commission to acknowledge this variability more explicitly.³ Please see our initial submission pp. 6-7 for substantive actions that are required in acknowledging linguistic diversity in ECE settings.⁴

We particularly stress the importance of not assuming that reference to “culture” automatically prompts attention to *language(s)* issues. We commend the Commission for its general attention to this point, especially explicit references to Aboriginal and Torres Strait Islander languages other than English and their speakers. We respectfully suggest that a further edit along these lines be undertaken.⁵

We suggest that better recognition of the specific needs of CALD children be included in revising at least the following Draft Recommendations:

Existing Draft recommendation 2.4: Review and amend additional educator subsidies

The Australian Government should amend the Inclusion Development Fund Subsidy for an Additional Educator and Immediate/Time-Limited support, including ... allowing other human-services qualified staff and inclusion professionals, such as allied health or other relevant professionals to be employed as an additional educator, where the Inclusion Agency agrees this would be appropriate. (p.75).

ACTA Comment. An 'additional educator' for CALD students would most appropriately be a bilingual teacher or teaching assistant from relevant language groups who can communicate effectively with families and support children as they become familiar with English. We note in Figure 10 (p. 21) that 28% of the ECEC workforce are migrants, and therefore are likely to be multilingual. We urge the Commission to recommend explicitly that knowledge and skills in languages other than English are included as a criterion for subsidising “additional educators” – they will benefit both CALD and English-speaking children.

Draft recommendation 3.6: Contribute to professional development for the ECEC workforce.

The Australian and state and territory governments should provide support for the ECEC workforce to undertake professional development activities ... to... deliver more inclusive ECEC, including for children with disability, developmental delay or additional needs, children who have experienced trauma, and Aboriginal and Torres Strait Islander children, particularly those attending in mainstream settings (p.69).

ACTA Comment. In our submission to the Inquiry, we proposed professional development to support teachers to develop resources, tools and training for an Early Childhood EAL/D approach to (1) assessment that incorporates assessing children's home language abilities in relevant settings, and (2) curriculum and pedagogy materials that align with the EYLF 2.0 framework for EAL/D learners.⁶

Dot Point 3 in DR 3.6 (p.69) should explicitly reference learners of English as an additional language or dialect from both Indigenous and migrant/refugee backgrounds.

Draft finding 7.1: ECEC services cater to many children and families, but some families need additional support.

Integrated services can support children and families experiencing vulnerability or requiring services beyond ECEC (p.77).

³ Although designed for schools, the following might provide useful guidance: [Microsoft Word - EALD Overview and Advice revised February 2014 \(acara.edu.au\)](https://www.acara.edu.au), pp. 6-7.

⁴ [Submission 74 - Australian Council of TESOL Associations \(ACTA\) - Early Childhood Education and Care - Public inquiry \(pc.gov.au\)](https://www.pc.gov.au)

⁵ For example, in the heading on p. 148ff: “culturally safe services” should read “culturally *and linguistically* safe services”.

⁶ [Submission 74 - Australian Council of TESOL Associations \(ACTA\) - Early Childhood Education and Care - Public inquiry \(pc.gov.au\)](https://www.pc.gov.au), pp. 6-7.

ACTA Comment. We welcome the vision of integrated services and the specific comment that “*These can take many forms, ranging from partnerships between services to fully integrated hubs offering a range of services to children and families*” (p.47). We propose that descriptions of integrated services include explicit mention of refugee service providers and cultural resource centres that support multilingual families across Australia.

Regarding universality, flexibility and affordability

ACTA advocates for quality ECEC for adult English language learners as an essential support for access to the **Adult Migrant Program (AMEP)** and **Skills for Education and Employment (SEE) Program**.

- (1) **The SEE Program.** We understand that the SEE Program does not support ECEC provision for its students. This limitation is directly contrary to the Government’s drive to improve access to Foundation Skills. It may also be a contributing cause of under-subscription to the SEE Program and its underspent budget.⁷
- (2) **The AMEP.** The AMEP is funded through competitively awarded contracts by the Department of Home Affairs, for which not-for-profit and for-profit providers tender, the former being mostly TAFE Institutes (also Adult Migrant Education Services Australia).

The AMEP provides free ECEC for students. The Department of Home Affairs sets an hourly rate for ECEC based on the assumption that AMEP classes are delivered for 4-5 hours per day, allowing providers to book 4 or 5 hours of childcare with an ECEC provider.⁸ However, the reality is that ECEC providers require *full-day* bookings. In the few cases where half-day bookings are available, AMEP students often cannot collect their children before the session change over. In at least some states and territories, the AMEP provider therefore must pay for a full day’s childcare. They also pay holding fees during term breaks and over the December/January summer break period. Childcare for AMEP students is absolutely essential in allowing adult migrants and refugees to access English tuition and basic settlement knowledge but this lack of flexibility makes it very expensive.

We suspect that requirements to pay for full days when fewer hours are needed applies well beyond the AMEP.

Some AMEP providers have set up their own creches to avoid paying for unused childcare hours.

To promote flexible student access (a priority in all reviews of the AMEP), providers offer the option of 5-6 class hours per day for three days per week. This attracts those in part-time employment and others with needs relating to health, caring for family members and overcoming the debilitating effects of torture and trauma. However, a regulation in at least some settings prevents children being in a creche for more than 4 hours per day⁹ and therefore excludes those requiring more class hours in the day.

A further regulation is that parents must be on campus while their child/ren are in a creche. This excludes AMEP students from attending class excursions, which are invaluable in promoting English for settlement and learning about their community.¹⁰

⁷ Under-spending has occurred subsequent to extension of eligibility for the AMEP and therefore many adult migrants continuing in the AMEP. The focus of the SEE Program is now being redirected to meeting the needs of fluent English language speakers who face literacy and numeracy challenges.

⁸ Additional payments cover the time required to drop off and collect children (childcare travel).

⁹ We do not know if this regulation is particular to institutions, jurisdictions or is national.

¹⁰ For example, excursions to the supermarket to practise the English of shopping, to community facilities and resources (including local the local life-saving club).

In tendering for AMEP contracts, it is difficult for providers to estimate ECEC demand. When AMEP creches are full, which is frequently the case, providers must either exclude students or cover the cost of external childcare in addition to the amounts for which they originally tendered.

ACTA lacks the human resources to investigate these issues in sufficient depth to provide recommendations to the Commission. However, given that the AMEP provides for more than 60,000 students p.a.,¹¹ we believe that these intricate problems merit attention.

(3) Visa restrictions on access to ECEC. Similarly, ACTA does not have the capability to document the lack of ECEC access for different visa holders seeking permanent residency in Australia. We suspect there are substantial numbers of children of migrant, refugee and international student graduates from the AMEP, SEE Program, university and VET courses, including those with high levels of qualification and skills, who are or could be employed and contributing to Australia's productivity and tax revenues but who cannot afford private childcare.

We urge the Productivity Commission to seek data on these numbers, or recommend that it be gained, and to consider recommendations that would extend the principles of universal, affordable, inclusive and flexible ECEC to these excluded families.

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¹¹ This figure is based on data in the [Evaluation of the Adult Migrant English Program New Business Model \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/evaluation-of-the-adult-migrant-english-program-new-business-model). We suppose that numbers are much greater now subsequent to extended eligibility for this Program.