

Dear Productivity Commission,

After reviewing the draft recommendations of the Productivity Commission Inquiry into Childcare and Early Learning, I'd like to submit my support and concerns for some of the recommendations.

I support the below recommendations:

- Diverting funding from the proposed new Paid Parental Leave scheme to early childhood education and care. Access to quality, affordable care is the most significant obstacle my family faces to workforce participation by both parents.
- Encouragement and incentives for employers to trial innovative approaches to flexible work and other family friendly arrangements. The inability to juggle parenting and work commitments is another key obstacle to workforce participation for almost all parents we know, and there are limited work opportunities that provide the kind of flexibility that is required.
- Increased investment in subsidies for low income families.
- Ongoing funding by the Australian Government for universal access to 15 hours of preschool. There are widely documented benefits for older pre-school children to have the opportunity to learn social skills in group environments, and every child should have this opportunity.
- Extending the scope of the National Quality Framework to include all centre and home based services that receive Australian Government assistance.
- Implementing a nationally recognised working with children check
- Requirement for all schools to take responsibility for organising the provision of an outside school hours care service, where there is sufficient demand

I do, however, disagree with the below recommendations. I would not regard their implementation as in the best interests of families and children, in particular children's rights to access quality education and care:

- Allowing services to temporarily operate with staffing levels below required ratios by averaging over a day or a week
- Requiring educators working with children under 3 to only hold a certificate III level qualification (ie; no Diplomas required)
- Removal of eligibility of not for profit providers to payroll tax and Fringe Benefit Tax exemptions.
- Simplifying the National Quality Standard and identifying standards or elements that can be removed or altered while maintaining quality outcomes for children.
- Removal of preschools from the scope of the NQF.

Thank you for taking the time to read my submission.

Regards,  
Lars Jensen