

# Evans Head Pre-School Association Inc.

1 Beech Street, Evans Head NSW 2473  
Email: evansheadpreschool@bigpond.com  
ABN 26 374 272 360

PO Box 162, Evans Head 2473  
Phone (02) 6682 5235  
Fax (02) 6682 4007



Dear Commissioner,

I am a Director of two NSW Community Pre Schools (one Centre based the other Mobile). I hold a Bachelor of ECE and a Dip.Teach (Primary & Special Schools). I have 23 years teaching experience across those education sectors, including Long Day Care in a For Profit Service. I wish draw upon that experience to comment upon a number of your recommendations.

## Productivity Commission Response to Recommendations

### 1. The removal of pre-schools from the NQF.

- The draft report does not offer enough detail to enable pre schools to access whether they would be better off financially under the State Education System or extending their hours to become part of the Federally funded NQF system. It also does not allude to what system of accountability should be implemented if we were to be part of the state education system.
- NSW pre school have historically been under funded and would be nervous about the possibility of losing Federal Universal Access Funding which the productivity commission draft alludes to continuing only in the short term. What mechanisms should be introduced to ensure that NSW passes on universal access money immediately and will we be funded in a similar way that schools are now funded?
- Pre School educators have put a lot of work into changing over to the NQF only to be told they will no longer be included before there has even been one complete ratings cycle so that the system can be evaluated effectively. We cannot work effectively with young children and their families when the goal posts keep moving with each federal and state election.
- Since we have been included in the NQF there has still not been a level playing field because Pre School families have been locked out of most rebate systems, despite all centers undergoing the same ratings system. So it has given us additional work without any additional benefits to families financially which we had hoped may come with the NQF.
- It is a philosophical debate over whether all early childhood services should be grouped together under the NQF or whether all Education facilities operating school hours and terms should be group together on the education continuum. From a philosophical perspective, in the past Pre Schools have aligned themselves with the education portfolio because we see our charter as being child and community focused rather than from a productivity perspective of freeing up woman to take up great workforce participation. The fact that we do provide high quality education and care means that many families choose us to care for their children while they work.

## 2. Combining the CCB & CCR into The ECLS

- Simplifying subsidies to families is a step in the right direction.
- Selecting the median as the measure of deemed cost of service delivery means that by nature only half of services are charging that amount or less. So 50% of all services are charging above that deemed rate. I am concerned that this may not be the most equitable way of achieving a deemed cost.
- Linking the payment to the activity test in which both parents must work or study a minimum of 24 hours per fortnight will discriminate against children. It will lock out the children who most need **quality** early education. Education is the key to improving outcomes for these children.

## 3. Economic Viability of Not For Profit Pre Schools

- The draft recognizes that community pre schools are offering quality Early Childhood Education and have performed highly in the ratings system compared to For Profit Long Day Care. This is the result of passionate Early Childhood teachers leading fellow Educators to provide quality Early Childhood Education. We spend our own time doing documentation, programming, attending meetings and advocating for children and colleagues despite a lack of pay equity with similarly qualified colleagues in Primary and Secondary Education. It appears we are shooting ourselves in the foot because now the commission believes there must be fat which can be trimmed away when in fact many teachers just go *above and beyond* to ensure children don't miss out. It is also the result of our management structure. A voluntary management committee made up of parents and interested community members is focused solely upon what is *best for children* rather than what will suffice for children whilst delivering profits to shareholders.
- When the NQF was introduced, in our experience, Community Pre Schools juggled budgets and worked hard to comply with the quality standards as soon as possible where as *some* For Profit Long Day Care Centers have held out on employing ECTs and have complained long and hard about the burden of employing qualified ECTs to their profitability and it seems to have worked for them. Despite their business being indirectly funded by tax payers through CCB and CCR reimbursements which allow them to charge higher fees.
- Removal of the Registered Care element of the CCB and the removal of Tax concessions for Not for Profit Community Pre Schools would have huge ramifications for our viability. Many smaller centers in Northern NSW are already struggling financially. With these new changes Families would not be entitled to any rebates. How is that fair to families? Community Pre schools in NSW should be free or low cost as it is in pre schools based on school grounds and in other states.
- I agree with the recommendation that 3 year olds should be funded where country services rely upon them to maintain viability. However, research reported by Deborah Brennan and longitudinal studies from The UK (such as EPPE) and The US (including Chicago Child-Parent Centers, Perry Pre School Project etc) underlines that all children benefit from 2 years of a quality pre school program delivered by qualified educators, particularly those from disadvantaged backgrounds.

- Fees in NSW community pre schools will go up because removing tax concessions etc will drive costs up. Our families will be less able to off-set these costs through fee relief.
- Research shows that the children from more disadvantaged backgrounds are those with the greatest need for **quality** care. If we leave market forces to drive service provision the reverse will occur.
- The commission says it is removing tax concessions in the interests of equity but this will benefit shareholders of companies not families, and certainly not children.
- Viability funding for maximum of 2 years out of 7, while a step in the right direction, it won't go far enough for centers servicing isolated farming communities which are rural but not necessarily considered remote anymore. Mental health is a real issue for adults in these areas, and often their community pre school is the only service they are linked into. We are the person who they have built relationships with and we are often the ones to notice declining mental health or other indicators of wellbeing issues and link that family into support services.

#### 4. Qualified Educators for Under 3's

- This was one of the most shocking recommendations as it contradicts all current research on brain development, attachment theory and longitudinal studies on the benefits of quality care and education by qualified Educators.
- One analogy which we heard recently says if you're under 3 and you get sick you can see a nurse only when you are 4 you can go to the doctor.
- Certificate 3 is a **minimum** qualification. It gives a rudimentary understanding of child development etc. Cert 3 graduates are expected to *apply knowledge and skills to demonstrate autonomy and judgment and take limited responsibility in known and stable contexts within established parameters* (Australian Qualifications Framework). Educating and caring for a group of toddlers and babies is rarely, if ever, a predictable or stable context. It is a complex and challenging role requiring a skilled practitioner with the confidence to guide and track development and build relationships. Babies in lower quality care have higher amounts of cortisol in their brains reducing their ability to learn and adapt. We suggest that not only will babies be at risk but inexperienced educators will be at risk without the guidance and mentoring of ECTs and diploma trained Educators (ECA North Coast).

#### 5. OOSHC for Pre Schoolers

- Regulations about ratios for young children are there for their safety as well as the quality of the learning environment.
- Allowing pre schoolers to attend OOSHC within a large group of older children and fewer adults to oversee the program is asking for trouble. Nothing in the school environment is constructed for 3 and 4 year olds. The toilets are often away from supervision, equipment is over sized for their needs etc.

- It also increases the responsibility and workload on supervisors if a pre-schooler needs extra assistance, with health and hygiene for example, they are unavailable to supervise other children properly. A lot can go wrong in a short time frame without appropriate supervision. Children's interests and abilities also vary widely over such a large age group.

## **6. Averaging out Ratios over Time: possibly even over a week:**

- "Under the roof" type scenarios place children at risk when qualified staff are not actually supervising children but can still be counted in the ratios.
- Businesses that are looking to save money will find ways to abuse this system and children will lose out.
- Averaging ratios over a day mean that centers can employ less staff at certain times of the day to save money to the detriment of stress levels amongst staff and the safety and wellbeing of children. If less staff are on the floor during the arrival and departure times messages do not get passed on for example and staff don't have time to spend talking to parents because they need to supervise children.

## **7. Removal of higher ratios in NSW**

- The commission has said that national standards are to be introduced in the name of harmony. Why is it necessary to lower the standards in NSW to the lowest common denominator? We suggest that the real reason is cost.
- The commission cannot claim to want increased harmony within the Early Childhood sector on this measure whilst removing pre schools from the NQF and reopening the divide between education and care.
- This would definitely be seen as a backward step and one away from quality.

### **Re: Information request 5.1: What are the optimal hours of attendance at pre school to ensure children's development and what is the basis for this.**

- As the commissioner acknowledged there is no firm evidence that 15 hours is the optimum level of attendance for pre schoolers in the year before formal schooling commences. This may fit into the session schedule of other states but not NSW.
- In my experience, and that of my colleagues, a minimum of 12 hours is necessary for children to settle and reap the desired benefits. 18 hours would be the optimum level in the year before school and, particularly for disadvantaged children and those with additional needs.
- In my experience children who attend pre school for two years with two days attendance in their initial year, building to three days in the year prior to school, get the most from preschool and make the transition smoothly to formal schooling ahead of children who only attend one day.

Thank you for this opportunity to make a comment on the draft. I hope that the final report will take on board the research on what is best for children rather than simply what is best for business and the economy.

Yours Sincerely

Allyson Cuskelly

Director  
Evans Head Pre School Association Inc.  
P O Box 162  
Evans Head  
NSW 2473