

COMMENTS FOR THE PRODUCTIVITY COMMISSION DRAFT REPORT:

CHILDCARE AND EARLY CHILDHOOD LEARNING

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Information Request 12.3

Subsidised care without an activity test is desirable for at least ten hours per week.

Families with one wage earner and a non-working parent should not be excluded from subsidised access to EEC for the following reasons:

- Many families are required to relocate away from their family/support network to follow employment. Child care has role to play in supporting these families by preventing the stay at home parent becoming isolated, or unable to gain respite from the long hours alone with young children. Parents isolated at home with small children may be at risk of becoming abusive towards the children.
- Some non-working parents may use the time away from children to perform volunteer work, look after relatives, and go to parent help at their older child's school. All worthwhile activities and valuable to the community.
- Families in low socio economic communities use child care to give their child educational and social opportunities. Children from higher socio-economic areas also benefit from attending child care in preparation for kindergarten and to socialise with other children.
- Ten hours per week would allow non-working parents to have two half day sessions, or one full day.
- Maintaining the current means test would allow non-working parents from lower paid single income families to have affordable access. Non-working parents from high earning single income families do not currently qualify for CCB or CCR, and should not in the future, unless they or their child is at risk.
- Subsidies should be paid directly to the service.
- Removing non-working parents from eligibility for CCB would significantly impact rural and regional enrolments.

Information Request 8.3

Making extended absence places available on a short-term basis for other children.

Our service is able to provide flexibility in bookings by doing the following:

- Families who are planning an extended absence suspend their booking with an end date. A new booking is made with the proposed recommencement date. Other children are able to use this place on the understanding it is for a limited time.
- A half rate charge can be applied to the absence if ten working days' notice are given, thus holding the place if the absence is only for a few weeks or days and families do not want to suspend the booking.
- Printing booking sheets two weeks in advance informs the roster, allowing for correct staffing ratios. This combined with the use of a diary helps us to allow for families who have rotating work rosters.
- The main barrier to providing this flexibility to families is staffing. Services generally employ staff on permanent full-time or permanent part-time contracts, according to

the enrolment demand. If a suspended booking is allowed and the place not taken up by another child the financial viability of a service may be jeopardised. Quality casual staff are not readily available in regional and rural areas.

Draft Recommendation 13.2

Linking information for each child from the National ECEC Collection to information from the Child Care Management System, the Australian Early Development Index and NAPLAN testing results to establish longitudinal database.

This is concerning for educators working in Children's Service. Care and education of very young children is a 'soft' science that uses the EYLF to guide children in developing social, emotional and life skills, including pre-concepts in maths, literacy and natural science, through play and unstructured experiences. Outcomes from this type of learning and personal development for children are difficult to measure and report. The danger in expecting educators to report results and outcomes from this type of learning is that children will be pushed into meeting a prescribed set of benchmarks, and that educators will be even more bogged down in paperwork than they already are. It would also be inappropriate and unfair to expect this level of analysis and assessment of children's achievements from a workforce that is largely TAFE trained, even at diploma level. It would create an expectation of an even higher level of performance than already exists, and without the proper remuneration, or incentive to increase qualifications and skill

Draft Recommendation 7.2

That all educators working with children aged birth to 36 months are only required to hold at least a cert III or equivalent

We recommend against the above for the following reasons:

- To comply the NQF educators are required to contextualise the Quality Area indicators. This requires skills and knowledge that is not consistent with a Cert III qualification. At least one educator in each 0-3 room should be at least Diploma qualified.

Specific research is underway to determine the value of highly qualified educators working with children birth to 3. Karen Kearns, in her book *Birth to Big School*, (2010, pp 8-10) says:

"The first three years of life are the most critical for the development of synapses....During the first three years of life, given the appropriate experiences and stimulation, a child's brain will make an estimated 1000 trillion synapses for connections."

Fraser Mustard (2007) cited in Kearns' book, has also researched and found that experiences in early childhood:

"Affect gene expression; shape emotion and regulate temperament and social development; shape language and literacy capability; shape perceptual and cognitive ability; shape how we cope with our daily experiences; shape physical and mental health in later life; and shape physical activity and performance."

- We feel this research supports the best practise of placing well-qualified, experienced educators, who have a thorough understanding of children's development in rooms with under threes. While some Cert III educators have an instinctive ability to care for these children they may lack the depth of knowledge of theory around child development needed to support positive outcomes for young children.
- Families with children under three years deserve to receive the best possible care rather than the minimum level of care.

Draft Recommendation 7.6

That Governments and ACECQA should:

- ***Urgently reconsider the design of the assessment and ratings system***
- ***Explore ways to determine services' rating so they are more reflective of overall quality***

Our service waited four and a half months to receive the draft Assessment and Rating report after our assessment visit, and then fourteen days to respond. It is very difficult to recall conversations and occurrences that happened so long ago.

It seems as though there is much double handling of the Assessment and Rating Report. Currently the assessors visit the service and then send on the information from the visit to another group of assessors. Perhaps it would be better if the people visiting the service for the assessment visit also had the power to complete the report and award the rating to the service. These officers may need some extra training to complete this. This would speed-up the process and also release more people to conduct and complete the assessments on the front line.

Draft Recommendation 7.11

Governments should remove those food safety requirements in the National Regs that overlap with existing state and territory requirements

Services should be able to work with their local government agency in relation to food safety and remove this requirement from the quality standard as long as services can demonstrate their compliance with those agencies.

Draft Recommendation 7.5

That services should be allowed to temporarily operate with staffing levels below required ratios....

Our service would support this concession to standards. This would be used only as a temporary measure in times of staff illness, or 'bulges' at beginning and end of days when staff are rostered to leave but children are late being picked-up, or vice versa in the mornings. Services would need to demonstrate through their rosters that they intended to maintain ratios but due to various circumstances there were temporary breaches in ratios.