

Productivity Commission Response to Draft Report

This submission is submitted on behalf of the Albury and District Community Preschool Partnering group, representing twenty district preschools. They are: Albury Preschool, Burrumbuttock Preschool, Corowa Preschool, Culcairn Early Childhood Centre, Howlong Preschool Association, Henty Early Childhood Association, Jindera Preschool, Kapooka Early Childhood Centre, Lockhart Preschool, Moresby Park Preschool, Mulwala Preschool, Pleasant Hills Preschool, Ross Circuit Preschool, Scots Preschool, Springdale Heights Preschool, The Rock Preschool, Thurgoona Preschool, Tocumwal Preschool, Uranquinty Preschool Association and West Albury Preschool.

- We believe that any children that are listed under the priority of access guidelines, should also receive equity funding. This means children with additional needs.
- By introducing a Special Early Care and Learning Subsidy for children with additional needs we are concerned that lots of money may be used for one off grants to assist services to include children with additional needs. We need as much money as possible in the pool so additional staff can be employed.
- We support block funding for providers to deliver services in disadvantaged and Indigenous communities;
- Viability assistance to services to ensure they remain open when demand drops in rural and remote areas is essential. Many regional, rural and remote services rely heavily on 3 year old enrolments to survive. They are often the only early childhood centre in the area and many families choose to send their children to preschool for two years. We are concerned with the lack of funding for 3 year old children. Without the ability to offer mixed groupings we would not remain viable therefore impacting on the service provision for 4 year olds utilising our service.

- We support the continuation of Commonwealth funding for Universal Access to preschool for children in their year before school; The Australian Federal Government must make Early Education and care a Budget priority, in recognition of it being “an investment in our Human capital.”
- We agree with encouraging preschool attendance by linking family benefits to preschool attendance.
- Removing the registered CCB subsidy, the only subsidy that families using preschools can receive; effectively increases the cost of preschools another 66 cents an hour. We are already the most expensive state and it is unaffordable for many families now. We are concerned that we may not be able to implement the NQF to the best of our ability in the future due to the new NSW funding model and a shortage of funds. *“The deemed cost of care may not reflect quality provision. If not-for-profit services are hampered in their ability to operate the quality and quantity of care will be reduced. The recommendations regarding preschools are exceptionally difficult for NSW community based preschools—especially removal from the NQF and removal of the registered care element of CCB.”* Community Childcare Co-operative (NSW), Broadside Briefing Paper #8
- The Productivity Commission has recommended a divide be created between ‘childcare’ and preschool. This draws an unreasonable line between early education and childcare – pushing preschool education responsibility to the states and allowing lower quality childcare for younger children. We have worked to unite care and education for years. The NQF has helped do this. To divide us now would set us back many years.
- We support the continued implementation of the NQF, not removing preschools from the NQF and bringing more services in scope;

- We disagree “dedicated preschools” should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation. The suggestion that the Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool is extremely complex and requires serious consideration of implications. What happens to the asset base? The consideration by the Department to give Principals responsibility for several schools as well as Preschools in rural areas could further complicate governance and quality. If we maintained independence but a Principal was represented on a board of management with the Director and Parent reps, then perhaps it is possible... but wide consultation would need to occur.
- Streamlining of the assessment and ratings process with improved consistency of the process is required. Roles and responsibilities of ACECQA and state regulatory departments along with improved communication strategies need to be implemented. High quality does not always mean time, it means good systems and efficiencies. Once these are in place, and a service is able to meet all NQF requirements we are able to reflect on our service delivery and continue to improve and offer innovative service delivery. We are not opposed to a simpler rating system or exploring ways to determine services rating so they are more reflective of the overall quality, SO LONG AS IT DOESN'T WATER DOWN THE QUALITY by removing elements and standards from the National Quality Standard; The NQF has considered best outcomes for children! All Quality Areas are equally important and should not be eliminated from the National Quality Standard.
- We support introducing a national Working with Children Check.

- Whilst we agree that all states and territories should have the same ratios and qualification requirements they should be consistent with the higher NSW standards, not lowered. The NQF has meant that all services have to be aiming for higher qualified staff and better ratios which impact directly on quality for children. We therefore support implementation in full of all ratio and qualification requirements. Services should continue to maintain required staffing levels at all times rather than “maintaining staffing levels on average (over a day or week). *“Robust regulatory requirements do more than ensure that children are healthy and safe; they are fundamental to the provision of quality early learning experiences that promote children’s holistic development and support staff stability and job satisfaction. Current NSW ratio and teacher qualification standards are critical to achieving these outcomes for children and the ECEC workforce. Watering down ratios and qualifications to below nationally recommended standards will compromise quality education and care experiences for children and add to entrenched barriers to attracting and retaining committed, qualified staff. Children need and are entitled to regulatory standards that are consistent with a vision of giving them the best start in life.”* Dr Marianne Fenech, Senior Lecturer, Institute of Early Childhood, Macquarie University
- ACECQA and Governments should NOT provide “detailed and targeted guidance” to providers on educational programming; Degree qualified early childhood professionals are the experts to guide educational programming and practice.

In order for Australia to start to become recognised with the developed countries in the OECD figures for Early Childhood Education, we must have a system that has clear guidelines and regulatory systems ensuring high quality services. The NQS is a very high quality system that, if implemented as it was designed, gives Australian children the best opportunity for an early childhood education that is more on a par with the leading countries in the developed world.

Therefore continued focus on government investment to maintain our system that already exists is essential, not a watering down in order to increase the profit for owners. A watering down of the system will without doubt, see a drop in staff qualifications, adult to child ratios, pay rates for staff, higher staff job dissatisfaction & turnovers, which all impact on quality for our youngest citizens, who are our future workers and leaders.