



## **Great South Coast Early Years Network:**

### **Response to the draft Productivity Commission Inquiry report into Childcare and Early Learning**

The Great South Coast Early Years Network is a group of agencies working across the Great South Coast with an interest in better outcomes for children and families.

The Network works across five local government areas: Corangamite, Glenelg, Moyne, Southern Grampians and Warrnambool and includes representatives from all levels of government as well as not for profit and private providers of early years services. It aims to improve outcomes for children and families.

The Great South Coast Early Years Network welcomes efforts to support a more flexible, affordable and accessible early childhood education and care sector that delivers high quality education and care for Australia's youngest children and has had an ongoing commitment to supporting the sector.

The Network acknowledges the valuable role of all services and providers for the critical role it plays in meeting and supporting the divergent needs and aspirations of families with young children living, working and studying in the Great South Coast. The first five years are the most significant in a child's life. It is during this time that they build the foundation for lifelong learning, health, wellbeing and success.

Further investment in the early years is needed to ensure that flexibility for some does not result in an increase in fees and out of pocket expenses for others. Any reform or reallocation of the existing funding and support arrangements should be approached with due care in consultation with families and the Early Childhood Education and Care sector to ensure that negative unintended consequences are minimised.

While Childcare has specific and undeniable links to productivity and workforce participation, this is by no means the sole purpose of the sector's existence and any attempt to balance support for workforce participation should not impact on the quality of the educational and or care experience for young learners into the future. Consideration for the quality of education and care on offer and the associated outcomes for children need to be at the forefront of any proposed changes. The cost of any changes should not adversely impact on service viability.

A significant focus of the draft report appears to be the flexibility of services to meet the needs of working families. While this is important, the determination that any change proposed by the productivity commission will be funded from within the existing funding envelope may mean that changes intended to increase flexibility for some families may in fact limit flexibility and affordability for those families already accessing Early Childhood Education and Care (ECEC). Workforce participation and the needs of parents always need to be balanced with the best interests of children. Short term productivity gains should not adversely affect social and educational outcomes for all children into the future.

There is a considerable and enduring body of evidence demonstrating the long term social, educational and economic dividends delivered by investment in early childhood education (Schonkoff and Phillips, 2000; Schonkoff 2009; Sylva et al, 2004; Yoshikawa et al, 2013).

The Productivity Commission Draft Report raises a significant number of questions regarding demand, availability, regulation, support, accessibility, affordability and flexibility in the ECEC sector. The Great South Coast Early Years Network essentially supports the aims for the new ECEC system



proposed in the draft report. However, given the significant research available on the importance of the early years and consequently there are a number of aspects to the draft report to which the Network responds..

The ability to deliver both high quality and affordable Early Childhood Education and Care early childhood is a balancing act which has flow on effects. It needs to be affordable, accessible and appropriate for all families on all income levels.

The early years are a crucial stage where children undergo substantial physical, cognitive, language and social and emotional development. A wide range of literature shows that developmentally appropriate learning opportunities and positive experiences in the early years foster children's holistic development and greatly contribute to successful outcomes later in life.

The Network raises concern over the recommendation of reduced qualification requirements for educators of children aged 0-3 years. Children in this age group need more than child minding; they need early learning opportunities. The Great South Coast Early Years Network believes that there is substantial evidence to support the need for at least a certificate III level amongst our most vulnerable age group – birth to 3 year olds. Increasing access to services without qualified staff present and attention to quality will not deliver good outcomes for children nor the long term productivity benefits for society. The qualifications of staff and staffing arrangements are the central features of a quality early childhood service and poor quality environments can lead to adverse outcomes or missed opportunities to foster resilience and a love of lifelong learning.

For children who spend time in the care of early child education centres it is important that they have access to a high quality standard of service. It is critical that the staff are knowledgeable, skilled and competent.

Quality Early Childhood Education and Care child enables parents to work or study, while also providing young children with the early childhood education experiences needed for healthy development. Child care assistance is a vital public investment that increases the sustainability of employment for parents and provides stability for parents struggling to gain economic security.

The Early Years Learning Frameworks and National Quality Standards outline achievable standards for children and children's services developed through extensive research and consultative engagement, by a team of experts in the field. These have been embraced by the sector to a varying degree however they do provide a comprehensive vision for those concerned with early childhood development and the quality of early years care and learning.

All children should have access to high quality early learning programs from infancy through to commencement of school education, regardless of location or economic means. School age children should also have access to high quality programs before and after school and during vacation periods.

Children's spaces and services provide rich environments for learning and play, healthy living and social and emotional wellbeing as well as being welcoming spaces for families and cross- disciplinary teams.



Families are able to participate in the workforce to the extent that they decide is best for them and their children, with support to balance their work commitments with their parenting responsibilities.

The Great South Coast Early Years Network recognises there is unmet demand in the community in the provision of childcare, particularly outside of standard hours (weekends, early mornings, evenings, overnight). However, the recommendations in the draft report in relation to increasing the availability of subsidies for more informal childcare arrangements raises concerns in relation to the challenges that this may create; such as the potential for exploiting the system (especially given the recent experience with the Family Day Care sector); and as the difficulties associated in appropriately monitoring the quality of informal services.

The Network is pleased that the Commission supports the rights of Vulnerable Children and Children with Additional Needs to access childcare and early childhood learning centres in the same way as other children. Inclusion is not just about being able to enrol your child at a service; it is enabling that child to actively participate in all the education programs offered by that service. However, more attention needs to be focussed on appropriately supporting and resourcing services to include these children.

Important areas of focus for many members of the Network is ensuring that there is continuation of support for disadvantaged groups. Continuing existing supports for children assessed as at risk of abuse or neglect and with a diagnosed disability is critical. Continuing existing supports for indigenous children support for regional and remote areas to maintain viability of early years services. It is critical to ensure that all children have equal opportunities during the early years regardless of where they live or their socio economic background.

Whilst the Network acknowledges the concerns held by the Commission in relation to the lack of monitoring of the Special childcare benefit and the ability for certain providers to exploit the rules and charge unreasonable fees, thorough consideration of each case is always applied when services amongst the Network have accessed this benefit on behalf of families.

What is suggested to overcome the Commissions' concerns is that of a more enhanced monitoring system and the introduction of stricter criteria for services to apply for this benefit. This will still ensure families in special need cases can still receive assistance in times of crises for the benefit of the children and the whole family. Recommendations to ensure the funding is used for its intended purposes specifically when services approve the first allocated thirteen weeks could involve; services providing certified documentation, clearer and stricter lists of authorised professionals who can provide supporting documentation that a family meets the criteria.

The Great South Coast Early Years Network expresses concerns in relation to the inadequate quality of **some** registered training organisations (RTOs). Members have found that early childhood Certificates that can be obtained in a matter of weeks, which do not allow for the appropriate level of learning and understanding to take place.

The Network supports the recommendation that funding and subsidies be streamlined into a single early care and learning subsidy, as this would be simpler for providers and families. The network also support payments being paid directly to providers.

A concern for the Network is in relation to the recommendation of Deemed Cost. The calculation and application of deemed cost needs to recognise a range of operational and contextual variables that contribute to the cost of service delivery. Areas that need to be taken into consideration are,



recruitment, retention and professional development of staff and ability to meet the existing requirements within the National Quality Framework (NQF).

Family Day Care provides an affordable care option in a home environment which suits some children better than a centre based environment. It has flexible hours of delivery to accommodate a variety of work hours.

The aims of increasing family's choice of care as outlined in the proposed ECEC are at odds with the current activity within the Family Day Care (FDC) sector. Due to a number of FDC providers taking advantage of loopholes within the system, the Commonwealth Government has indicated that all existing FDC licensees will need to reapply for funding if they are to continue to operate from 1 July 2015. Applications for the funding do not open until April 2015.

The government's approach to limiting support for FDC services from July 2015 appears to conflict with the recommendations in the draft report. Whilst generally the draft report appears to be attempting to find resolutions to unmet out of hours demand in a quality environment, the changes proposed for FDC will likely have a damaging effect within the sector.

The Great South Coast Early Years Network strongly supports the draft report recommendation to continue funding for 15 hours of kindergarten. The Network strongly contends it is essential that the government commits to this decision prior to the commencement of 2015 as any services offering 15 hours in 2015 will need to inform parents of the significant increase to fees to cover the federal government's shortfall before commencement of kindergarten. Such an increase in fees is likely to impact negatively on kindergarten participation; which also has negative flow on effects for school readiness and on lifelong learning outcomes for these children.

The Network does, however hold apprehensions about the recommendation that preschool funding be included within the schools funding arrangements. Without appropriate measures to tag this funding; the Network holds concerns regarding the transparency about its expenditure. For example, increasing pressures on school funding may jeopardise the full complement of preschool funding over time.

The Network believes that removing kindergartens from the NQS, as recommended, would be a backwards step. There was significant change and coordination working with kindergartens through the implementation of the NQS. To remove this only a few years after its implementation is questionable.

The Great South Coast Early Years Network holds the view that education doesn't just start in kindergarten and that it is a fundamental aspect of all early years services. Kindergarten does not have to be attached to schools to be linked to education.

Changes proposed in relation to the Outside School Hours Care (OSHC) area of reducing ratios and qualifications may reduce costs, but impact negatively on quality. Concerns highlighted by the Network include the potential of having 12 year old and 3 year old children in the same OSHC environment. Increasing ratios and expecting staff to manage with the range of ages, issues and abilities of children aged from 3 – 12 years old would bring with it a large amount of problems as well as make it an even less attractive proposition for services to attract future staff.

The Network thanks the Productivity Commission for the opportunity to respond to the draft report into Childcare and Early Learning.