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# *De Santis Management Agency*

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**To the Presiding Commissioner,  
Childcare and Early Childhood Learning,  
Productivity Commission.**

Email: [childcare@pc.gov.au](mailto:childcare@pc.gov.au)

Dear Commissioner,

I want to make a submission to the inquiry of issues which I consider will be of benefit in consideration in the public forum. My submission, which is attached, deals in two specific areas: Costs of running childcare centres and the training/ certification of childcare workers.

As a preface to my submission I will indicate that I am a former Senior Executive Manager in the NSW Public Sector having worked in DOCS and a number of government organisations along with central agencies and Minister's Offices. I worked primarily in the Human Resource Management area in most recent years but prior to that across the whole gambit of business/ administrative management in government.

I have also managed my own business, part time, over many years providing business management consultancy support to a number of organisations in the fields indicated above.

In addition I have provided training and development services for Universities, TAFE,. RTO's and government organisations over many years. I am degree and post graduate qualified in various business/ IR/ Law/ HR management areas.

I am also a parent and one who has grandchildren going through the childcare system. I hope you find my submission matters of definite interest for the issues raised.

Thank you for the opportunity to raise these issues.

(signed)

**David De Santis,  
Managing Director.**

*'Helping Industry Work Smarter'*

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## **Submission to the Productivity Commission relating to the Inquiry into Childcare and Early Childhood Learning.**

### **Item One:**

#### **Cost of childcare as regulated by Childcare Centres and condoned by government.**

##### **a. Children sick.**

My issue relates to a specific issue of the required payment for childcare by parents with children in daycare and childcare centres for the child's absence on sick days and for public holidays.

Sick days- All little children get sick. When parents have a child permanently booked into a child daycare or childcare centre when the child is sick they still have to pay for the day and the centre seeks a rebate from the government. No cost is absorbed by the business.

I can understand where a child is not permanently booked into a centre and is casual that the centre may want to charge for irregular attendances but when the child is permanently booked in I am of the view the centre should be required to absorb some cost and the government rebate should not be claimed. All businesses absorb irregular costs, most budget for them.

If given sufficient warning the centre can reduce the number of staff it has on for that day, thus reducing cost. If late notice is given the centre can reduce staff to a half day and they obviously do, at a reduced cost, but then charge the rebate. Casual staff can be ceased with less issues.

I believe the current system is a breach of the Trade Practises requirements in that they are charging for a service they are not providing, both to the parents and the government.

##### **b. Public Holidays.**

In NSW, daycare and childcare centres charge parents and the government for public holidays when they are not open. I have raised this at both the Federal and State level with the responsible Ministers. Their view is the centres have costs to cover.

I found their responses quite simplistic, the centres would obviously build into their salaries cost structure the wages for employees normally rostered on for public holidays, but they also have a large number of casual staff who don't get paid.

They allow for the cost in their centre charges by inflating them, knowing the parents and government will also pay these costs. Effectively they are profiteering on public holidays. They then charge the parents inflated charges all year round and the government for rebates based on the cost structure.

Once again I would strongly suggest this is a breach of the Trade Practises requirements in that they are not providing any service and are not entitled to charge for not providing a service.

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## **Item 2:- Training Issues- Levels of training required to be a Childcare Worker.**

My background-

As a Senior Manager in the Public Employment Office I looked after TAFE and School Education in my portfolio. I attended many schools and was a trainer at TAFE for 9 years. I also chaired many management/union dispute meetings

I also had experience in middle management in DOCS over a number of years gaining wide knowledge of childcare centre management, family group homes and hostels. As indicated in my covering letter I also have an extensive training background in all areas of industry/ government/ business/ people management at all levels including senior management levels and including training at Universities.

Watching Channel 2, Q&A a while back I saw an interesting interplay between the President of the P&C Association and the Vice Chancellor of Sydney University. It involved the firstmentioned saying new teachers had no classroom teaching skills- the latter responding with 'but they are very highly educated at degree level'- the firstmentioned saying but they can't/ haven't learnt to teach in the classroom.

The Qualifications Background-

Education and training has seen a constant review of practices over recent years so much so that it has lost its way. Recent evidence indicates that the very large amount of government funding thrown at it has achieved no improvement and allegedly made us go backwards.

My own experience is with the requirements to be a trainer- You must have the Workplace Trainer and Assessor, Cert. 1v course to be able to train.

This course many years ago was a 2 day course- statement of attainment. It is now the 3<sup>rd</sup> generation, soon to be 4<sup>th</sup> generation of a cert. 1v course. It has also been developed into a Diploma and Advance Diploma course and is soon to be a degree course as I understand it.

In addition trainers must undertake constant professional development much of which is of dubious standards. Eg. If I participate in a webinar irrespective of whether the webinar host/s are qualified I get a tick for professional development.

My view-

The current qualifications standards are being set by whom I call 'desk jockey' trainers. Those who didn't want to stay in the classroom/ childcare centre and who moved into administrative / policy roles in the Head Office of the government organisation.

Examples are plenty: 1- the current training framework requires relevant recent industry experience, which most RTO's take as 1 / 2 years. I have 2 people to choose from as a trainer- one who completed their training specialisation course 2 years ago and has only 1 years industry experience or someone who has 10 years' experience, but not in the last 12 months and has an equal qualification to the other trainer. Who would you select.

2- In nsw the attempts to reduce the current shortage of nurses is being hindered dramatically by the perceived 'desk jockey trainer' need for nurses returning to the workforce to gain an academic qualification at a cost of \$10,000 so they can be a nurse again.? Needless to say there is still a shortage. There is no doubt they will need professional development in returning to the workforce but is there a need for such a high level training response to achieve this.

The Daycare/ Childcare situation-

Go back to my view- 2 people- one a certificate 1v academically trained daycare/ childcare worker 12 months experience; two a woman in mid age returning to the workforce after having children, who has daycare / childcare experience over a number of years. Who would you select. The latter obviously needs professional development but the need to upgrade to a high level certificate course, which they may already hold, seems questionable.

What level of training should there be?-

I would suggest the level of training is appropriate at Cert. 1V. My extensive experience indicates to me the training and experience needed is through practical experience and life skills not solely academic skills delivered by persons who haven't been outside the training venue for a number of years. Eg University lecturers who haven't been outside the University for a no. of years training school teachers.

For example instead of being majority academic based eg. classroom based with field practical periods; the training should be majority workplace based/ field practical with a component of academic training.

I recently had experience of a Neuro Surgeon who didn't know what an epidural was.?

Similarly I had experience with my grandson where he is allergic to certain foods but despite signs in the daycare centre and staff being aware of this he was given one of the allergy foods, which was the centre group lunch meal, and ended up in hospital. Obviously he was withdrawn from the centre.

The nomination of a level of accredited training beyond the level needed is not desirable/ required. Consideration needs to be given in this discussion to the balance and comparativeness of the real skills and experience needed to do the job. Along with the awards/ salaries structures that workers are paid under eg. does a higher qualification automatically lift a salary level beyond what is reasonable/ required.

Often these determinations are made by people with professional ideologies and biases which are not linked with the majority of the workforce eg. 'desk jockeys'.

This automatically raises costs for centre management who in turn pass those costs on to parents and the government. I am not suggesting workers should be underpaid or under rewarded for their skill and input. But Centre management will not stop buying a Mercedes because costs have gone up.

Any increase in training levels needs to start at the top- eg Centre Management need to be not just trained as business people but they need to know how to manage the centre and need training in the skills and experience needed to perform the positions they administer in their workgroup. They need to do the Cert. 1V Workplace Trainer and Assessor course.

You would then develop a group of workplace based trainers instead of purely academic based trainers.

Clear and analytical assessment needs to be made of workroles and position descriptions should be formulated for all Centre positions to determine the genuine training and skills level needs. These need to be formulated by appropriately experienced persons in the workplace and not by those who do not have relevant recent workplace experience.

In all my very lengthy senior management/ management training activities and through evidence in my lengthy workplace experience I have always espoused there are not just 2 cultures in the workplace-1: The one management perceives the people have; and 2: The one that management strives to implement; but three cultures-3: The actual culture the people in the workplace have.

This has a vital bearing on understanding how they do their jobs, whether they adhere to pre-determined practises or have developed local practises. Obviously also the academically perceived practises could be quite distant from the actual practises.

I can example this with the education system. School Teachers teach modern methods and Higher School Certificate students learn current industry and other practises. The Higher School Certificate exams. are set by the Board of Studies, a group of ex teachers ('desk jockeys') who use resources to draw the questions from which aren't necessarily current industry practises. The result: there is very often significant difference between the students classroom outcome results and the Higher School Certificate exam. result.

I have personally experienced this also with the TAFE system where Category A subjects are subject to a centrally set exam, whereas other categories are locally set exams. Having marked those exams.- Category A- the constant comment from large numbers of students in response to many exam. questions was ' we didn't learn/ we weren't taught this issue/ area of study' .?

I will leave you with those thoughts. Given that DayCare and Childcare workers are responsible for one our most valuable commodities- our future generations it is vital we ensure they are appropriately trained and qualified to ensure their wellbeing during their formative years.

Thank you for your consideration of my issues.

David De Santis.