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Submission- Childcare and Early Learning Productivity Commission Issues Paper:

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Years in the Industry - 23 years

## 1. Government involvement in childcare and early learning

*Role of Government in ECEC:*

Government should have a role in the Early Childhood Sector- this should be a high priority of the federal government, I have definite views about the assessment and rating process, (which will be discussed later) , the role of state governments should be I feel smaller, as one body with appropriately qualified staff who could oversee assessment and ratings etc., who are in contact with services on a regular basis would be advantageous for a consistent approach. Local governments can be involved again maybe to ensure there is town planning around ensuring that enough services are available and that towns and cities are not over supplied as well, which is an issue in Queensland.

*Outcomes from ECEC for the next decade:*

1. Increased re-numeration for childcare workers- this is a huge issue for services, the pay rates for childcare workers is appalling. I have had recent experience of these two scenarios
  - One childcare worker who has two children had to find other work at a higher rate of pay as she couldn't afford to pay for childcare for two children on the wages she received at the childcare service.
  - On contacting a former student she advised that she was working as a hospital cleaner on an extra \$8 per hour over what I could offer her.

There is very little in the way of a career path in this industry and the ability to attract and retain staff is a huge issue, that will only deteriorate over the next decade. To attract quality workers who are passionate about the industry and who provide a high quality of care, is becoming daily increasingly impossible. The expectations of a childcare worker and their pay rates are completely out of kilter. Early childhood teacher's award wage is around the \$23 per hour, we cannot attract quality teachers to the industry with these pay rates, above award wages have to be offered but of course this adds to the fees for parents. Pay rates will definitely need to be addressed or the industry will not be able to offer high quality care for children.

2. Assessment and Ratings systems- This needs to be changed one more time to be useful, to be able to provide quality care for children and provide children and staff with consistent information in regards to best practise and improve outcomes for children. The industry is struggling with change fatigue and the constant changing of ratings systems. This is the fifth ratings system since 1996 and each change has been significant and really at the end of the day children have been left out as being important in this process. Administrative burdens have kept staff away from children, directors and co-ordinators away from supporting staff, these burdens have meant that children have paid the price. This latest change has been quite

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challenging as a completely new system has been introduced and there is a lot of expectations from Early Childhood Officers which is unwritten and has been difficult to gather information about what is required. A system that has ongoing support and provides each service with information that is not general and open ended would aid all services to provide a clear goal of what is required. I do not believe that having a ratings and assessment visit every year or two or three is an appropriate way to aid children in accessing quality care, what needs to happen is that an ECO would have a number of services that they visit regularly, provide feedback on all facets of childcare and could find appropriate training where identified and appropriate information. This would ensure that services would have a consistent high quality approach to childcare not just prepare for the big visit every so often. The family day care model of co-ordinators proves that this a successful strategy for ensuring compliance, best practise, and identified training. This is what services have been asking for over many years, having this consistent approach ensures that services are confident in their practices and are not always worrying that when a visit does occur we are not second guessing what is required. It is so frustrating when asking an ECO office something specific and they relay that they cannot tell us how to do it. Well if they can't who can? So a better ongoing consistent approach to monitoring is what is required rather than a once in three years approach.

3. Better funding arrangements for families- There needs to be another look around the childcare benefit and childcare rebate. Our experience is that families that choose to have their rebate paid to themselves rather than the service are families who struggle to pay their bills, often leaving services with debt, this is infuriating as a taxpayer, as the family receives their Childcare Rebate but does not pay their bill, in my mind this is fraud but there is nothing we can do other than to send the bill to the debt collector. I remember many years ago, when we used to have two payments, the government of the day made those two payments one, which was a great idea, hence we then had childcare benefit, now we have the two payments again, which is so confusing is not efficient and provides families a revenue stream without paying their childcare fees. Please this needs to be made one payment again and paid to services.
4. Pro rata Absent Days- Over the years I have seen the increase in children attending full time care, these children and their families are severely disadvantaged with the 42 allowable absences, this means that after 6 weeks they have to pay full fees. I have seen families having to bring their children in for short periods of the day to ensure that do not go over there absences, as they cannot afford to pay full fees. This scenario occurs with families who have separated, or families who want to spend the school holidays with the children, I am watching our children getting burnt out not having breaks from childcare and really struggling, a few of our children are in care longer than the staff are. I have heard from primary schools that children in grade 3 and 4 are really breaking down and not coping. Could this be that they have been in some form of care for 8-9 years already? This needs to be looked at. Pro rata of absent days would mean that children in full time care could access decent breaks with their families , it could look something like this

Five days a week- 60 days  
Four days a week- 48 days  
Three days a week- 36 days  
Two days a week - 24 days  
One day a week - 12 days

This would be excluding public holidays, it shouldn't be the case that families are financially penalised for spending time with their children.

5. Qualifications: This needs to be addressed I have watched teachers really struggling with Long Day Care environments, they are trained so differently and it takes a good couple of

years (if you can retain them) for them to grasp the concepts of the NQF and early childhood. I think this has been a mistake and we need to revisit this area, if you require a kindergarten teacher I feel a person with a Diploma should be able to access some extra training for 6-12 months so they are confident in the Kindergarten guidelines, or the Early Years Learning Framework. The stories from our district have not been great, teachers start and only last a week or so, directors having to constantly have teachers on performance review, high levels of training for teachers in quality and acceptable practices. The government of the day was advised in the initial consultation period, that this was not a viable option as the industry would not attract quality teachers, and this has been the case experienced by many.

6. Administrative Burdens: This needs serious consideration, some of the requirements we have to undertake are so onerous. Again this takes staff away from children and directors away from staff who need support and inspiration.
7. Focus on Children: This needs to be a priority, it seems that this is the last consideration for government, implementing that services need to have strong sustainability practices and are deemed not performing if they are not embedded practice, is that really what we want for our children, don't we want happy contented children who are connected to their carers and are in a nurturing environment, I feel after so long in the industry this is so much more important than having to excel in areas that are not that relevant, they have plenty of time at school and in their life to learn about these important areas. Staff are becoming exhausted at having to have worm farms and animals and other items that yes are great but to say services aren't performing if these are not in place is ridiculous.
8. Better Support services- Services need access to support services that can aid in managing additional needs children or children who experience challenging behaviours, the current ISS system is absolutely the worst system I have ever experienced, we really need to look at overseas models and see how they undertake this. They have experts come into the centres and aid in helping children and staff, currently the system is so administrative and there is no focus on helping the child.
9. Privatisation - There should be a limit on how many services one company can own, we are seeing the proliferation of companies sprouting again, and the general consensus is "Oh no here comes another ABC debacle." We need to encourage more Not for Profits and community services to ensure that their focus is the children not profit. Our children should not be seen as commodities, we need to start humanising our country again and place the people over profit.

### **Demand for and expectations of childcare and early learning services:**

*Are there families from particular household structures, socioeconomic groups or geographic areas that are now using some forms of ECEC significantly more than in the past?*

I have not observed in our local area any significant increase in any particular groups, a rise in full time care has been observed but not significant enough to make further comment on. Recently we have seen an increase in our babies numbers, with record births in May 2013 of this year experienced in this region, whether this will be an ongoing or just a cycle remains to be seen. We have a lot of families who are on FIFO rosters. The majority of our children attend 2-3 days per week. We have a variety of families from a variety of socioeconomic backgrounds. In our region we have a high proportion of lower socioeconomic families, as well as additional needs children.

*Which types of families are likely to require significantly more or less use of ECEC in the future?*

I haven't noticed other than a slight increase in full time children and a baby boom any particular trends or able to predict future trends. We have a lower socioeconomic community, with a high number of additional needs children, FIFO families, and the community has been devastated by the last two floods.

### **Children's Development Needs:**

*Would extending the length of the school day have a significant impact on children's learning and development outcomes or parent's workforce participation decisions? What other impacts would such changes have?*

I would like to comment on this area as I feel that lengthening a child's school day so parents would participate longer in the workforce is a really dangerous idea. We are becoming such a family unfriendly society and in Australia we are losing fast the concepts of what is important, that is families our children, our elderly, profit has become the driver and this should not be the case, we have increasing depression and anxiety in our young children and I have observed over the last 20 years the mental health of our society declining exponentially. We need to balance work and play and rethink our priorities for the sake of everyone's ongoing health. I have observed this phenomena as I have lived in a remote community in PNG where women were not able to access work, the community was a strong and happy community, volunteer work was high, ongoing study was high, the communities sporting bodies and other associations were run to a high level, the opposite was observed whilst working in an Australian mining community where the all women worked either part time or mostly full time, the community suffered as there was no help with sporting associations, community events, volunteer organisations. We have to look at the whole picture and not just the dollar at the end of the day as there are significant social costs to the community for a country that is solely focused on workforce participation.

### **Impacts on Workforce participation:**

*What is the relative importance of accessibility, flexibility, affordability and quality of ECEC in influencing decisions of parents as to whether they work or remain at home to care for children?*

The importance of affordability for this area is our biggest issue. The cost of childcare reduces the participation of parents from both working, the more you earn the higher the childcare costs and being \$300 per week (which is a cheaper rate than most of Australia) less Childcare rebate works out at \$150

which is a large amount to be paying, if you have two children \$300 is more than half of a wage and by the time family payments are lost etc, the viability of both parents working is made invalid. I cannot see why governments cannot understand this, with city childcare rates at over a \$100 dollars a day, why would anyone go to work and run a household then pay most of their pay on childcare, again the social costs of undertaking this is huge. Tired children, tired parents, who are stressed and run ragged trying to juggle all the facets of daily life, when for a little less money you can have children who are connected to their family are able to have a lifestyle that is not rushed and parents who can cope with daily life, yes finances would be tight but so are finances tight when both parents work. We really punish people in Australia for trying to get ahead. The ideal balance for families is one parent to work part time and have a family member help with childcare, with the child/ren attending formal care on a 2-3 day basis. That is more balanced and families can then cope with daily life. I am finding it difficult to understand why government want families to work more and be less connected to their own family, as mentioned mental health for children and parents is increasing. We need to look at other countries for guidance or maybe we could develop a culture in Australia where families come first.

*What trade-offs do working parents make in relation to their demand for ECEC? For example, are they prepared to accept lower quality care if that care is close to where they live or work and/or enables them to work part time or on certain days.*

This depends on each family as each family has different values and parenting styles, I have heard some parents relay that a centre has poor quality of care but that is the only place I can get them in, have heard others who travel long distances to attend a service they feel provides high quality care. Trade-offs depends on the individual family, in an area where there is high demand for care parents may take what is available even if they feel the quality of care is not to their standard. Again this could be addressed by a system that focuses more on monitoring on a regular basis rather than the current systems that rate over a period of years. Please do not hesitate to contact me if you need further clarification around a better monitoring process.

*Has increasing workforce participation by mothers increased the demand for childcare, or has improved availability, affordability, and/or quality of childcare led to increased participation.*

The demand in our area remains similar we have a mixture of fulltime working mothers, part time working mothers and non- working parents. The availability in our area is oversupply, we have had too many services enter the industry, very few services in our town are full. Town planning and governments needs to address these issues to ensure that areas that are undersupplied can have access to childcare. Affordability has declined with fees for parents in the next few years increasing dramatically. Parents relay often that they are only concerned if their child is happy when they pick their child up, it is really difficult to engage parents in the daily running of a childcare service, if they are working parents they are really busy and do not have the time to have long and meaningful discussions with educators. There are a few who take an interest but this is usually the minority. I was a validator in the old NCAC system, this was a story at every service I validated, plus the services I have worked in.

*How have government ECEC support programs affected workforce participation.*

Not sure what is considered an ECEC support program, but if you are talking about JET funding that has helped a number of single parent families access services so they can train and return to the workforce, however the funding for this scheme has declined and not as effective as it was previously.

### **3. Availability and cost of Childcare and Early Learning Services:**

*How has the sector responded to growth in demand, including changes to types of care offered, cost and pricing structures used by different types of providers, and any viability pressures?*

*Alternative models of care*

The sector has grown rapidly in some areas and are over supplied whereas other areas are undersupplied. The costs of childcare depend on location and demand. City services are generally fewer and fees are significantly higher. Regional areas especially in Queensland are oversupplied with fees being cheaper. Extreme fees of over \$125 per day would be due to demand and wages pressures with some states having higher rates of pay. The costs of running a service are increasing at an unprecedented rate, with the National Quality Framework demanding teachers on site, changing environments to meet new natural outdoor and indoor experiences for the children, ongoing costs of electricity, compliance in all facets of fire regulations, work health and safety, human resources, etc. services are having to raise fees in line to ensure their viability.

The types of care offered cover most of the requirements of families, Long Day Care covers the majority of this care, with Family Day Care offering flexibility of over- night care, weekend care etc. In home care can also offer this flexibility, other services help to meet the needs of each community. The trial of Long Day Care Centres being open 24 hours per day is to say the least horrendous, we already have Family Day care that can meet this demand, government really needs at looking to support this service more to encourage more educators to offer flexibility of care. Do we really want children and staff sleeping over in LDC with all the issues of security and disconnectedness with home-life. This was trialled many years ago and failed, so not sure why we are trying this again. We really need to address what is best for the child and their overall wellbeing and sleeping over at a LDC is not conducive to their wellbeing. Family Day Care is the service that can easily meet this demand with incentives from the government to make it worthwhile to undertake this additional care. We do not need to make new services we already have in place what we need, we just need to utilise them more effectively.

*Services for Additional Needs and Regional and Remote Areas:*

*How well the needs of disadvantaged, vulnerable or other additional needs children are being met by the ECEC sector as a whole, by individual types of care and in particular regions.*

I have observed that most services struggle to meet the needs of children in this area, since the introduction of the ISS subsidy, services have lost specialist support visiting services and have gained frustration with the administration of the subsidy, this subsidy is all about paperwork and not supporting services and children, the focus of this subsidy needs to be addressed as a matter of priority. Previous systems met the needs of the child and services more effectively. Services have to sift through the various programs available in their area so we can try and make a connection to link and make connections to aid in training staff and including all children, this is at the cost of services, it costs services to have children with ISS and in Queensland our Kindergarten children cannot access this subsidy, services are struggling in this area as we feel we are not supported either financially or professionally in this area. Overseas models where specialists attend services to aid in the child's development would be better suited, also enough financial support to fully include children with additional needs is vital. In our area we have a high proportion of children with additional needs and this has a huge impact on the childcare environment. Services do not feel supported when taking on children with additional needs. The Inclusion Support Subsidy is not meeting services or the child's need in any shape or form. Inclusion Support has become a barrier to children accessing services, with so many in every environment the ability to effectively run a childcare room is extremely difficult, again

this is another barrier for staff to remain in the industry. In regional and remote areas it is a nightmare trying to access staff and affording the extra costs imposed on services when taking on children with challenging behaviours. Behaviours will increase with more workforce participation from both parents. Family Day care environments really meet a lot of these children's needs with smaller groups, however not every day care provider is able or capable of taking on these children.

Governments need to review the Inclusion Subsidy support, as a high priority, and make it more accessible without the mountains of paperwork trying to prove that a service needs these funds, once a child has been diagnosed the diagnosis is not going to go away and the child will need ongoing support. The funding needs to be directed at the child not as is currently undertaken as an extra person in the whole environment. These children need extra help and not being provided with this kind of help is hindering their development. If government is serious about mainstreaming additional needs children we need to have the support for the teachers and educators, as it stands I often have staff in tears as they are overwhelmed with challenging behaviours and the workload placed on them to perform at a high level when the program is so disrupted. The small hourly rate offered from ISS only covers a juniors wages and juniors are not equipped to be able to handle high needs children. The inclusion support subsidy is not a productive subsidy and really needs grass roots workers to liaise with government to relay what is needed, so called experts are not giving the industry what it needs to function successfully.

*Cost of Childcare and Early Learning Services in Australia:*

*Financial Difficulties arising from paying childcare fees, including the types or location of families experiencing the greatest difficulties in meeting childcare costs.*

Families do experience budget stresses when paying childcare fees, it is a significant cost and really limits families opportunities to buy housing, renovate or contribute to the economy in other areas, or save for their retirement. Government needs to be transparent in what they want from families, either be clear about whether you want, both parents to work, then provide the opportunity for this to happen, or if government wants a parent to remain home with the children be clear about this. Both governments have given mixed messages in this area such as we want parents to work but the cost of childcare is so prohibitive that it is not worthwhile for parents to do so. For the sake of our families we need a government that is strong, and able to articulate clearly their policies, saying one thing but putting barriers in place to prevent parents from returning to work is frustrating to say the least. We also need to consider the needs of the child, which everyone tends to forget.

The families that are hurting the most are single income families in lower socio economic areas, who dearly would love their children to access early learning services, but are unable to afford such care, also single parents are also experiencing the same difficulties. Families from the higher income bracket pay a good portion on one income to childcare, a lot of women are working to maintain careers. One of my family members had to give up work, as at the end of the week she was \$50 ahead if she worked, so for all the stress and trying to manage full time work, house etc, \$50 in the pocket was not worth putting children into care and working.

*The extent of price competition between providers and the effect this has had on fees and the quality of services provided.*

In Queensland the price of childcare is highly competitive due to the oversupply of services. For profit services are focussed on their profits and how to limit wages and resources, this has always been an issue but unfortunately governments will not or are not able to address this issue, if it was up to me all services would be not for profit to ensure that the best quality care is available to children. I have seen poor quality care across Australia whilst validating for the NCAC and it is pretty scary at times what is out there. Large corporations as per the ABC chain are now re-emerging and this again provides poorer

quality care for children as the focus is profit not children which is exactly what we don't want for our children.

*The flexibility providers have to price in response to demand and/or to meet the particular care and learning needs of children.*

Providers need to advise families well in advance when increasing fees, this usually occurs twice a year due to increases in electricity, compliance, wages, rates, training etc. If there is a large demand for childcare of course a business will have fees in line with that demand, if there is not the demand then fees will be lower. This is the natural course of business, unfortunately this comes at the cost of the well-being of our children and families. Families have to work more to pay childcare fees and living costs, children are more and more isolated from their home and parents and community.

#### **4. Government regulation of childcare and early learning:**

Benefits of new Regulations: There is limited benefit to the new regulations as services struggle to be compliant with the expectations around the new NQF. There is a lot of unwritten expectations that are difficult to comply with. I am pleased that we have a closer working relationship with our Early Childhood Officers in Queensland as this was absent previously, I have worked in the Northern Territory between 2005-2008 and found their licensing bodies extremely supportive and was hoping that one day Queensland would be similar and now we have a much better working relationship. The assessment process is still operated by states run so there seems to be an amount of inconsistency in the way services are assessed from region to region and across Australia.

Costs: Fees for families are and will be increasing dramatically over the next few years, trying to acquire a teacher everyday has meant that services have to offer above award wages to try and attract teachers to the industry, retaining them is another matter. We are able to hire students who are studying (this is interesting strategy, as students are not fully trained and still need to undertake practicums, so not sure how we are to retain them, not consistent for children, services or families). This is an ongoing burden for services as teachers are hard to retain so the impact of ongoing training and inductions adds to the cost for families. Fees will need to rise in our region at least \$10 per day over the next 12 months to make budgets and services viable. Our fees at present are \$76 per day, this will increase at least \$5 per day for the next financial year and maybe another increase at the end of the year on revision of performance of the service and to meet the increases in compliance and general costs. Governments really need to simplify regulations and to reject a lot of regulations that are totally unnecessary. I feel that having ACECQA as the main body but then states regulating for ACECQA at times still feels like we are dealing with two separate entities. The ACECQA website is not user friendly and trying to utilise their portals when you do not have a great internet connection is really frustrating. The NQF is a completely different focus to previous systems and of course to comply with this a whole new set of resources for services is required, this again adds to the fees for families, as well as training for staff. The roll out of this new system has been pretty horrendous for services trying to figure out what exactly is required of services now, staff on stress leave is also adding to the costs for services as well as the inability to retain staff due to workloads and poor remuneration.

*Work force issues and the effects of the National Quality Framework:*

The effect of increased staff ratios and qualification requirements on outcomes for children.

The issue of staffing qualifications has been a bit of a confusing issue as we have always had to have qualified staff who are studying or have completed a formal qualification. The main issue is teachers, this is a new requirement and to my experience and talking to others through network meetings, has not always been a rewarding experience, it has been extremely difficult to attract teachers then retain them, many stories of teachers only coming for a day or two or week then leaving. Directors need to re-train teachers in regards to the National Quality framework and EYLF, teachers are taught to teach where as that is not the focus for early childhood, our department will not see us as meeting national quality standard if we allow a teacher to teach as in a school environment. In early childhood it is about guiding and nurturing not teaching, if you understand the difference. Our Office for Early childhood education and care expect our teachers to be nurturers with education a part of the program where as teacher training is all about educational outcomes, there is a huge difference and my teacher has had a lot of professional development and guidance in this area, she is understanding the difference but it has taken a long time and she still sees herself as not where she would like to be, . I would ideally love to see as a viable workforce moving forward to have Diploma students who can elect to train with a 6-12 month extra training, we don't need university graduates for our roles, as per previously stated they have a different focus. At the initial consultation for reform, this was relayed over and over to the powers that be, but no one was listening. Then if you cannot find a teacher you have to pay to apply for a waiver then keep paying to advertise, which is extremely expensive and again adds to the cost for families. There are simple solutions to the issue but of course government does not seem to do simple.

The new staff ratios will make fees for families probably just about out of reach, here in Queensland we still have a couple of years up our sleeve, but the impact will be highly significant, to be honest I don't think we will be a viable industry as the fees will be too high for families to utilise services. I really am not understanding the issue, for babies yes 1-4 is appropriate, but when you are quibbling in older age groups whether they should be 1-4 or 1-5 is that what we really need to be arguing about as if you have great staff 1-5 is not going to be an issue, we are forcing higher fees and a less viable industry, less attractive to potential providers to provide services. Surely everyone can see this.

The pace of the implementation of ratios has been difficult as an industry we are still finding our feet in regards to the NQF, the unwritten expectations have been difficult and changing a whole system takes years not months. I have been very disheartened by the expectations and low remuneration for staff during this process.

The training packages that are available are failing our students, we have not seen high quality trained staff for a very long time, I had trained students for 6 months and was horrified at the training packages, they are not practical and do not address what happens in a service, the placement of students in services is not long enough and practical experiences are not enough. The training packages need overhauling by true representatives of the industry. The other issue around training is really about putting backsides on seats, students who have to study are completing qualifications without the passion or appropriate skills in place to be able to obtain work in a service, we need to look at how funding courses is appropriate not putting unrealistic expectations on RTO's to provide 80% pass rates as this means that RTO's have to aid these students through who would not normally pass if a training package was the standard it should be.

All the new requirements around staffing vastly increase family fees, that should not be a question that is asked as if you have more qualified staff of course the fees rise.

*Initiatives of governments to address workforce shortages and qualifications including the cost and effectiveness of these initiatives.*

I am in two minds in regards to this, I want staff that are committed to the industry and passionate about children, I have observed that providing fully subsidised courses and placing students in these courses as they have to study if not working, we haven't had many high quality students undertake placement for a very long time. I feel that students need to pay a fee but if that fee is too high, with the low remuneration for workers, this is a disincentive, so we need a balance some subsidy, better training packages, and students who want to be there not have to be there and to not place such unrealistic expectations on RTO's in regards to outcomes, when we undertook our courses in the early nineties, we were told that 50% would drop out, now the expectation is that most will pass the course, leading RTO's to pass students that may be struggling to undertake the work, which then presents as the issue of they have the qualification but may not be able to either obtain work in the field or be retained in the industry.

*Initiatives of providers to address their workforce shortages and skill needs, including the cost and effectiveness of these initiatives.*

We don't have any initiatives around this area, initiatives would be to offer above award wages, however in our area of lower socio economic demographic this means that this would place fees to high and again as stated previously our region is vastly oversupplied with services. We do try to provide our workers with a harmonious and supportive environment.

*Particular locations and areas of skill for which it is hard to find qualified workers.*

I have worked in a remote mining area, it was an ongoing battle to attract and retain qualified workers, we did offer above award wages, but could not compete with the mining jobs, the workload and responsibility was too high so staff would leave to take on other jobs for the same money or higher monies.

I have found in regional area such as ours it is finding high quality staff, as many have the qualifications but are not providing the type of care that is required in a service.

I have not worked in a city, but again I would imagine that finding high quality staff would be an issue as well as the variety of employment that would be available with higher income and less responsibility.

So in general the whole of Australia would be struggling to find high quality staff, the issues around remuneration is the biggest factor in relation to this.

*The extent to which training/childcare courses enable workers to meet the requirements of the NQF and how training could be improved.*

Training packages need to be more relevant to the industry.

More trainers need to be from the industry

The courses need to have participants who are passionate about childcare and want to be there.

When we were trained ( in the good old days) our course was run by trainers who were working in the industry, they had relevant information and up to date information, our course was very practical and gave us tools to enter the industry equipped and ready to enter the workforce. Now training is undertaken by trainers who may not have been working in a service for a very long time, the training packages are not as practical, tools and strategies are not given to students to enter the industry. This has been an issue for a very long period of time and the industry has voiced concern over this for again a long period of time. I feel that training has become a quick way of getting workforce supposedly

qualified, but this has been to the detriment of workplaces. Again the way that RTO's have to justify there funding needs to be changed.

We need to have TAFE colleges as the RTO, as smaller RTO's are causing poor outcomes and causing TAFE to compete in the quick qualification scenario. We need change, again to previous systems where students came out capable of undertaking the job they were trained to do so. Now qualification does not mean competency.

*Other workforce and workplace issues, including any aspect of government regulation, that affects the attractiveness of childcare or early learning as a vocation.*

The huge issue I have is around the Certified Supervisors, this has been the biggest hindrance to staffing and rostering, of the whole NQF, if I could see the reason behind this that maybe would help, but there is no rhyme or reason to this concept. I have had staff had to stay for 10-11 hour shifts to cover certified supervisor requirements, this cannot go on. Other services have staff not consenting to becoming a Certified supervisor and this means that rostering is near on impossible, it is not uncommon to have 4 staff away on one day, maybe one on holidays, two away sick and one has sick children, happens from time to time, who does these shifts, directors, other staff already on roster. This cannot go on long term, again we will lose staff to other industries. The new form that a new supervisor has to fill in is way beyond ridiculous, I cannot understand why one government department has to have that much information on that person, you do not need to provide that much information for a passport. I have asked where this information is stored and the time frames around storage, no answer has ever come forward. If I was asked to fill this form out now, I am sorry but would leave the industry, I will not give a government department my whole life. This needs to be addressed as a matter of urgency as it will be the straw that broke the camel's back for many directors and staff, I am are very frustrated in regards to this expectation and I feel that it is time that we need to stick up for ourselves and say enough is enough. The funny part about it is that you can have a Certificate III in charge over a Diploma or teacher, does not make a lot of sense. Again this needs addressing urgently. It is a huge barrier for staff and services to provide a staff environment that is friendly and meets staff needs. It needs to go this regulation and soon. The length of time to be processed as a Certified supervisors is 60 days, this is not manageable for services, again cannot have staff working long hours whilst waiting for a person to become certified, it would need to be at a maximum two weeks, two months is not workable. Each state already has blue cards or an equivalent, so why do we need another process on top again, adding to another system that needs to be managed. This is an item that needs to be seen as a failure and removed asap. The added bonus on top of all of this you have to pay to become certified, really by the time you pay for a blue card, first aid, asthma and anaphylaxis training as well as other training costs, most childcare workers undertake professional development in their own time at no cost to the service, the costs are out of kilter with staff remuneration.

The paperwork around children's assessment and development, there is no consistent approach so it is very confusing about the expectations or requirements. I know that staff are all different and have a different approach but it is difficult with no clear cut guidelines. The expectations of providing scrapbooks, plus observations plus daily updates is huge and time consuming, staff have two hours non-contact time per week, which is not enough to cover what is required. I have found over the last 13 years that children are not sleeping as they once did, (would love some research around this), so it is difficult at this quiet time to achieve what we once achieved during this time in previous years, don't forget all staff have a lot of cleaning to undertake, fill out the appropriate paperwork on top of all these other tasks, where do we have the time to fit this all in whilst being a high quality educator. Again poor remuneration and high expectations, and burdensome paperwork.

The other issue is the threat of being fined, I find this really off putting, I don't see teachers put under this duress, I find it quite insulting and heavy handed. This needs to be looked at also. If we had a different approach to assessment with an area co-ordinator visiting regularly and not just being assessed

every couple of years, I think you would find an industry better equipped, more confident about what they are doing, and being compliant on a more consistent basis. I can't recommend this approach more strongly.

I would be very reluctant to encourage young people into the industry as the expectations are so high and with all the challenges that we face everyday with challenging children, which are on the increase, administrative burdens, low pay, cleaning,,family separations, constant changes and training, it has become a very unattractive industry.

I think also change fatigue is huge in our field, we have had so many changes for really not much better outcomes, we have seen trends come and go and ratings systems changed significantly, if you keep changing systems for not better outcomes then your most experienced workers will and are leaving the industry in droves.

We expect our workers to comply with so much and still give the children all our time, not possible.

The cost of training for staff in comparison to their remuneration, as stated previously is out of kilter. A lot of staff attend training in their own time as to add this to budgets pushes again fees up for families.

*Are the requirements associated with more subjective aspects of the National Quality Standards, such as relationships with children, clear to service operators and regulatory staff? Is further guidance required ?*

This area is fraught with danger, if industry states it wants further clarification then we may be stuck with the likes of a system e.g. certified supervisors, which is a barrier and a hindrance to services. We need guidance by our Early childhood officers about expectations, this to some extent is being relayed but not enough to ensure that we as services feel confident about the criteria required. As stated previously a better system would be one based on ongoing visits from ECO's which are supportive and ensure that services are meeting expectations, it seems silly to have a system based on assessment every couple of years. We have a really great ECO, as is her manager they are doing their very best to aid services in this area, they cannot give specifics which at times is very frustrating , however this is not their doing. The inconsistencies around assessment is also providing services with difficulties, contradictory information is being relayed by training etc, as various regions, areas and states have different expectations, hence why I feel we see such differences in the NQF snapshot of ratings, as an ex-validator, the NQF snapshot report has lots of alarm bells ringing in regards to the inconsistency of the whole process.

*Could the information on the 'My Child' website be changed to make it more useful or accessible to families? Are there other approaches to providing information to parents about vacancies, fees and compliance that should be considered..*

On recently viewing this system I noticed that the fees for services were not up to date, this needs to be addressed, I think the best principle for websites for families is Keep it Simple, parents do not have the time to look through all the information, I think I would add photos with colour that attract clients to read articles, if it is all too wordy it gets passed by. I feel there is more than enough information about services, although at times it can look like not many available if you place the incorrect information in the search engine. I feel that services are expecting this to be automatically undertaken through the CCMS system.

*How particular regulations (including NQF) impact on the structure of operations, cost and profitability of ECEC services – for example, are services consolidating or amalgamating their operations to reduce administration costs.*

1. The cost of hiring teachers has impacted on services, one paying for advertising to try and attract teachers is a significant cost, then having to offer above award wages to try to attract and retain teachers is a huge burden on costs and fees for families.
2. Single services cannot amalgamate or consolidate, some directors do all the wages, superannuation's, tax etc, on top of all the admin burdens of the NQF.
3. Training for staff is another huge cost, most staff undertake training in their own time but the cost of the workshops is paid by the service, this has been a huge undertaking as the new system has presented many challenges. Also we have had staff visit other services to gain information on services that have already been assessed. This means that we need to replace them whilst on their visit, again more cost for families.
4. We have all the additional costs of fire compliance, WHS compliance, Fairwork Australia, etc.
5. We are a not for profit service and we aim to keep fees low, but with all the costs associated with running a service the fees are still around \$68 per day, we will introduce meals this year as the children's lunchboxes from home are not conducive to good nutrition. This will make our fees \$76 per day, we also had to review fees to accommodate increases in wages, resources and ongoing electricity costs.
6. Profitability should not be the main concern, again would like to see services all not for profit, as for profit services have different focus.
7. The NQF has added loads of burden in relation to costs, resources need to have a different focus, staff are finding they are having to spend their own time accessing natural materials to comply which again detracts from being a childcare worker. The cost of maintaining all the systems required is onerous such as blue card registers, HR systems, First Aid registers, Quality Improvement Plans, etc etc.

*The share of fees that can be attributed to compliance costs*

That would be difficult to quantify, however hiring staff who are qualified or studying is a significant cost, hiring quality staff is another issue as these employees are in demand and maybe offered higher salaries to attract and retain. Providing natural environments is also a huge cost, maintaining a natural environment into a built environment is very expensive and requires lots of ongoing maintenance.

All the rest of fees is basically compliance except for utilities and insurances. So a significant part of fees is in regards to compliance, so approximately 35 % is in regards to compliance.

*The extent to which regulatory requirements are causing services to change the number or mix of children they care for.*

The issue around child age groups is the inflexibility at times of managing a communities needs for childcare, if you have a high number of a particular age group it would be fantastic to change age groups to suit that community, without the drama of building requirements which have no value to the quality of childrens outcomes. The ratio of mixed age groups is really frustrating as we would love to have an open door day on some days so children can access all rooms and mix with siblings, but with the ratios required this is not possible, I am not sure why we corral children into rooms and not have them mixing with other age groups. I feel so sorry for our modern day children as they struggle through this system, I am watching children so tired and frustrated and showing mental health issues as some of the children are here five days a week with little or no break from the service. The smaller ratios for us is in 2016 will significantly affect our fees and ability to care for the younger age group, but again who will be able to afford the care and really why are we so intent on arguing about a 1-4 or 1-5 ratio .... Yes babies I get that, but over 15 months...why is this such an issue, the same with the older groups if a community is

desperate for care, either the government steps up and does something about it or we keep ratios the same....

*The extent to which regulatory burdens arise from duplication of regulations and/or inconsistencies in regulations across jurisdictions:*

The new system is meant to have stopped this and the industry thought we would have less paperwork and compliance checks, but this is not the case, we have so many documents now it is ridiculous, the guide to the NQF is so repetitive and non-specific, again another frustration as we feel that we have to met every criteria but ECO's relay they may not look at this and that but we might...please we need clear guidelines to be effective and feel confident in our approach. Again I come back to the same issue of scrap assessment and go to an ongoing monitoring approach so everyone can be on the same page. The certified supervisor again is another double up, we have checks on staff to ensure that all are capable of undertaking their job, again repeating this is a huge burden on services.

*How do you stop inconsistencies across the nation?*

Good luck with this one, ongoing training for ECO's, I can see is the only way and monitoring of their practices to ensure a consistent approach, we have fantastic ECO's, in our region, but I know the next region has real issues with their ECO's, inconsistency is visible through forums on the Professional Learning website, with different expectations from ECO's represented through the questions asked, check the forum on programming and this is very evident.

*How could the NQF and other regulations affecting ECEC be improved – both requirements and their implementation/enforcement – to be more effective and or to reduce the compliance burden on ECEC services or workers and or administrative costs for government.*

1. Forgo the certified supervisor's regulation altogether, this is such a barrier for services and is hindering the industry and adding to staff losses. This would also reduce costs to government as they would not need to process forms etc. Sixty days to process a certified supervisor's certificate is unmanageable for services, so a lot of services would have to break this regulation as they would not have enough supervisors to cover holidays, sick leave and emergency situations that staff experience. I still have not been advised why we need certified supervisors, what the actual idea is behind having this burdensome regulation, especially when you can have Certificate III supervisor over Diploma staff, as mentioned previously staff are refusing to become certified supervisors which is their right and adding to rostering issues. Services already have lots of checks and balances in place to ensure staff are competent and fit for employment, why the government would want to undertake this again and micro manage services is a mystery. I would challenge the minister to come and roster for services with this huge hurdle facing services everyday. Out of School Hours services especially are struggling with this as they have lower staff numbers and relying on relief staff may mean that they do not have enough certified supervisors and again it takes up to 60 days for one to be approved, not good enough, so they would be forced to breach regulations. Unless all your staff are certified supervisors rostering is near on impossible on some occasions, so if all the staff need to be supervisors what is the point of having another burdensome system on struggling services. If the regulation is being breached probably everyday all over Australia so what is the point, it obviously is not an effective strategy. The other issue is the access to the portal for certified supervisors on the ACECQA website, I see this as a huge privacy issue.
2. Simplifier the requirements, there are so many documents, and industry has not been exactly sure what is needed so, services implement all requirements whether they are necessary or not to cover themselves, and provide a lot of stress and extra workload (again taking care away

- from the children). I would really like to ask has anyone asked the children what they would like, it seems lots of research around children but has anyone actually asked a child face to face, whether they would like staff with heads down writing taking photos and being distracted by compliance or whether they would like staff to be interactive with them.
3. The costs of training staff to meet new requirements has been enormous, a lot of unpaid hours also has been necessary to try and figure out the requirements of the NQF. The information from training and ECO's has been at times been contradictory, this places further burdens on staff and services as they try to wade through information which is confusing and conflicting.
  4. The cost of attracting and retaining teachers has been an onerous burden on services, this upsets other staff, as their understanding of the industry is of a higher level, than that of teachers who have a different focus. The ongoing costs of advertising for teachers is expensive and adding to parent fees. Trying to attract and retain teachers at times is quite nightmarish, often teachers need ongoing support to be able to comply with the NQF which is different to the educational institutions that they have been trained in. With the allowance of student teachers this has resulted in frustration as they need to complete practicums, this means that staffing is inconsistent and places stress on other staff, children and families, I feel that this measure should be removed. An experienced diploma staff member is more than capable of fulfilling this role, if you really wanted to an advanced diploma would be more than enough to cover the requirements of a teachers role.
  5. Sustainability, this is a burden on services. I feel that children should have the basics of strong relationships with staff and then start to learn about their world, I think school would be more appropriate, services can do small things to help but further expectations should be left for later. In fact I would rather see a whole of community approach to this subject, I was recently in Singapore and was really impressed about their approach to this subject, it was a whole of community approach not just aimed at early childhood and schools. Yes it can be included but not assessed upon so rigorously, these are just children, let's get the basics right first. Staff and management have so much to do and comply with and try and give the children as much of their time as possible it is really a struggle to try and maintain worm farms, gardens, keep supplies of natural materials, keep pets, keep making recycled items, and be marked down if we do not undertake enough of these activities it is really disheartening when we need to be spending time with children. It is great that the children can have access to more natural environments but it is really expensive and time consuming to have natural environments in built environments. I just hope we are not swinging the pendulum too far one way, we need to balance our resources and activities for children to ensure they are able to cope in the modern world which is not particularly child friendly. Long Day Care centres are not natural environments for children, they are struggling as both parents now work more, I am not convinced I am seeing the right outcomes for children. Maggie Dent is the most informed on this subject, it is a shame that governments don't take on board what our professionals are saying about our children, we need to look at the holistic side of children not just the educational side. It is really difficult as staff need to spend their own time trying to source and find natural items, staff need a work life balance and spending weekends on work commitments is burning staff out and again they are leaving the industry. Services that are located to bushland etc, can access the natural environment easily and services that are fully booked and are very financially secure can afford to buy those resources, services that are not near natural environments and are not so well off financially are really at a disadvantage around this area.
  6. We seem in Australia to make so many systems so complicated, administratively burdensome and we have lost the ability to just do our job and be more practical. All the paper in the world will not make a child feel that they are important or feel they are cared for.
  7. The assessment system does not work, again assessment every two or three years, is not creating high quality care on an ongoing basis. An appointed area manager, who could work with services and aid them with advice, training etc. would be far more valuable for services, you could build great relationships and the industry would feel more valued, supported and have services consistently at the level that all stakeholders are able to feel comfortable with. As a director who has been in the industry for a long time and seen many systems come and go, the

value of having a high rating service has not been an advantage, parents are not particularly interested in ratings and at the end of the day, staff are undertaking stress and extra workloads to obtain high ratings, but not much benefit from that rating, only self- satisfaction. I feel it is more important to train high quality staff and have the resources available for them to undertake great programs, the resources should be aimed at the children not spent on administrative processes etc.

*How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?*

Childcare fees with the new requirements of the NQF will increase dramatically over the coming years, we will have to increase remuneration for workers to have an industry at all, which will impact hugely on fees. Governments will need to look at what their needs are. Does Government want more parents in the workforce and if so how will they fund the costs of childcare to allow families affordable childcare. If this is not addressed I feel that young families will be financially unable to make home purchases , renovations etc until after all the children are in school. This would have a huge impact on the overall economy. Families are already able to access a variety of services to meet their needs, Family Day Care meets shift workers needs , this is an area that government could fund better to ensure that more FDC educators take on more out of core hours care. Long Day Care should never be expected to operate 24 hours a day, it is not a viable option and would be a very unsafe practice as well as an unaffordable practice.

Families should be able to access childcare without financial burden, this is up to government and their policies which need to be clear and transparent about that policy.

We need to have a much simpler system of payment to the centre, currently we have a system where families can opt to have their CCR paid to themselves, this can then lead to families leaving services with debt, so effectively they are being paid for out of pocket expenses that they haven't actually paid. One payment should be the option, this would be simpler for all stakeholders. All subsidies should be paid to services first, this ensures that families are not abusing the system and that services are not chasing as much bad debt.

If the Childcare rebate was subject to family income levels you effectively will cut out families from accessing childcare altogether, as a politician if you have two children in care are you prepared to pay up to \$1000 plus per week for the privilege of going to work????

I do not agree with the new proposed maternity leave payments, that money would be better spent on ensuring that child had a job in the future, the current maternity leave payments are more than adequate and affordable for the country, taxing businesses is an insane solution.

*Is it confusing and/or costly to deal with the large number of programs and agencies administering ECEC support? Is there overlap, duplication, inconsistency or other inefficiencies created by the interaction of programs?*

There is a vast array of programs and agencies to deal with, it is really time consuming to wade through all the information and requirements of all the different programs and agencies, yes everything could be simplified. The ISS could be disbanded and reorganised to be a subsidy that is

worthwhile and practical, as was the previous system. Keeping all the documentation for compliance and audits is very overwhelming and creates administrative nightmares.

*Which government support schemes do you consider are warranted, well designed, and efficiently implemented and administered and which are not? Which schemes do you consider offer the most assistance to your operations?*

### **Well run programs**

Grandparent Child Care Benefit  
JET funding (although this is not as beneficial financially as previous assistance)  
Special Childcare Benefit

### **Programs that are inefficient:**

ISS  
Queensland Kindergarten Funding

*How could government support programs be reformed to better meet government objectives for ECEC?*

Inclusion Support subsidy needs to be aimed at aiding the additional needs child and the service to better met the needs of the child. At present the focus is on the environment, the environment does not have additional needs the child does and staff need training and ongoing support to aid that child to grow and develop. Changing the focus of the subsidy to the previous SNSS funding would go a long way to inhibit staff burnout, help the child with needs to grow and develop, provide services with information on strategies to aid the child, decrease frustration for the child and staff. It seems so obvious but here we are many years later the director sitting at the computer typing up onerous amounts of information to secure a small amount of money for an unqualified person to aid in the environment.

*Should support be paid directly to parents, direct to ECEC services or some combination of these?*

It makes sense that the ECEC should receive all the rebates and childcare benefit, what does happen at times is that a client will have the rebate paid to them and leave the service with the debt, to my mind this is fraud and a ridiculous scenario to place services in.

Payments should be kept as simple as possible, trying to keep all the documentation for all the payments is onerous, services are always chasing families for information or documentation, families are not particularly good at giving information across to services.

*Is there scope to streamline and simplify access of providers to support arrangements for children with additional needs?*

The industry has been calling for reform in this area since the introduction of the ISS scheme, to be totally frank it is horrendous, the current scheme is just an administrative nightmare of form after form, parents having to prove over and over again that their child has a disability , services have to spend an inordinate amount of time on plans and paperwork that is not aiding the child in any way shape or form. This needs urgent attention, what we need is specialists that visit to aid in including children with additional needs, currently we are paid a paltry sum

to employ an additional worker, so the cost to services is quite high to include children with additional needs, then we have to send staff off site to train, which is also costly. The amount of monies allocated to this area could be much better utilised to aid staff and families to include children in early learning programs.

The industry needs an extra worker plus specialist visitors to train on site, then staff would feel more confident in coping with the challenges of additional needs children. The money saved on the administrative burden would more than pay specialised trained personnel to aid services. Staff need practical help and expecting staff to train usually in their own time will again hinder high quality staff from leaving the industry. The ISS system is a horror story and I wish a member of parliament would come and try and fill out the paperwork over and over , we then may find that the system would change rapidly.

*Is there scope to rationalise and streamline the many types of funding provided by the Commonwealth or state/local governments.*

In Queensland we are struggling with the additional funding for implementing the Queensland Kindergarten funding, this is a huge system that adds to the administrative burdens for services. The other issue for whatever reason is that Kindergarten children cannot access ISS, which is ludicrous and discriminatory, the state is supposed to undertake this, again another system and this is done in two rounds so if you miss the second one in June there is no way of accessing funding for aide with children who start after June, again another frustration to add to the list and another system to manage, less incentive for teachers to remain in the childcare industry.

In conclusion:

We need urgent review of some of the issues around our industry, we are so heavily regulated which is leading to staff leaving the industry in droves, dissatisfaction and frustration with the administrative burdens, unrealistic expectations on staff in regards to paperwork, and meeting their job descriptions, again leading to staff leaving the industry.

The most urgent items for us at this services is:-

- The removal of the certified supervisor's regulation
- Condensing the compliance for services
- Review of the ISS program
- Childcare benefit and Childcare Rebate made one payment and paid directly to services
- Review of the requirement of teachers in services
- Review of new ratios and the impact on the community
- Review of assessment and ratings to a more ongoing monitoring and support system
- Remove the process of fining staff for breaches
- ACECQA website to be more user friendly
- Incident reports to go directly to Early Childhood Officer, as they currently are to be posted on a portal to ACECQA ( that is if you have a good internet connection, or an internet connection at all)
- Review of private childcare centres and corporation ownership, services should be limited to ensure that the ABC scenario does not happen again, focus for corporates is profit not children, again our children are not commodities.

Leonie Arnold  
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YMCA Childcare and Kindergarten