

Productivity Commissions Inquiry into Child Care and Early Learning Issues Paper

Lady Gowrie Tasmania is a not for profit community owned organisation that provides a broad range of services to children, families and early and middle childhood professionals. It is governed by a voluntary Board of Directors who brings a wealth of experience, knowledge and skills in specific skill areas to ensure the organisation is sustainable into the future. In terms of education and care, LGT is the largest provider in Tasmania. Currently the organisation manages and operates services in both regional and rural and remote areas including:

- Thirteen (13) centre based long day care education and care services
- one (1) family day care service
- two (2) occasional care/preschool services
- twenty one outside school hours services

It is also contracted by the Federal Government as the Tasmanian provider of:

- Professional Support Coordinator
- Inclusion Support Agency (South East Region)
- Indigenous Professional Support Co-ordinator

The organisation also received funding from the State Government to provide a Family Support Service. As well Lady Gowrie Tasmania delivers early childhood qualifications within Tasmania through the Gowrie Training Centre.

Established in 1939 by the Federal Government as a best practice and demonstration model, the organisation is well recognised for quality of the services provided. The organisation supports the National Reform Agenda for Early Childhood Education and Care and has embraced the National Quality Framework and the elements therein. The organisation has been diligent in planning both in terms of workforce and facilities to ensure it is well placed to implement the Framework in a systematic and positive manner. Despite reports of the Framework increasing the cost of education and care for families, LGT has been able to absorb operational costs resulting in no fee increases for two years. This is despite the organisation providing above award wages and conditions to educators.

LGT supports a Productivity Commission Inquiry of Early Childhood Education and Care as there sound economic benefits from investment in this sector. The Productivity Commission Inquiry scope appears to focus on family affordability and accessibility. While important, the priority must be given to

improved education and well being outcomes for children and balanced with the benefits of increased workforce participation. It is imperative that children’s rights are central to any future decision making process and the needs of working families are not overshadowed by the needs of children.

Australian does not invest in the early years to the same level as other developed countries and not achieving the same level of quality in early childhood services compared to other nations. Given evidence based research indicates that the first three years of a child’s life has the most impact on the child’s brain development, social and emotional well being and later mental health, it is imperative that every child in Australia has the opportunity for optimal development. Quality education and care services in the preschool years are a significant contributor to such development. Therefore, early childhood education and care sector must have the necessary support to ensure preschool programs are provided by highly qualified, experienced and skilled educators who are remunerated in an equitable manner as their peers in a school environment. Pre-service training must be rigorous and robust with ongoing professional development and support beyond the initial training process to ensure emerging research and theory is translated into practice as part of the continuous improvement process. To achieve an improved standard of early education and care (childcare), workforce issues must also be addressed aligned to any determined strategies. Within this state (Tasmania), although there are some good examples of practice, the quality and capacity of the workforce has decreased alarmingly. The sector needs to be valued, but with this the sector indeed needs to commit to being a profession and professional in all areas and take some responsibility for their own ongoing professional development and lifelong learning.

Lady Gowrie Tasmania now responds to the Productivity Commission Inquiry consultation document (attached) and appreciates the opportunity to do so.

<u>Key Questions</u>	<u>Feedback</u>
Government Involvement in childcare and early learning	
What role, if any, should the different levels of government play in childcare and early childhood education?	<p>Children’s development does not begin when they enter the school environment. Evidence based research indicates the most crucial period of brain development is in the first 3 years. If governments are committed to improved outcomes for children and supporting learning and development then education and care must be part of the mainstream education system – birth to twelve years of age.</p> <p>Early childhood education and care is the shared responsibility of all levels of governments. Therefore, all levels of government should contribute to support quality education and care accessible to all children regardless of their socio and demographic environments, abilities and needs. It should not only for work related purposes but available to all children so as to support their educational outcomes. Naturally, work related care needs to be</p>

	<p>accommodated to support workforce participation and to support the economy, however care for respite and social interaction for children support their learning and development.</p> <p>Governments also have a role in increasing the workforce through incentives for training of educators and teachers. However there must be improved and stringent compliance and monitoring role to ensure quality training is provided for educators and teachers by RTO's and Universities so as children are beneficiaries of quality curriculum provision and incentives from government are not seen by RTO's as simple a commercial activity.</p> <p>There are critical workforce skill shortages in the sector; however, it is imperative that the sector is not seduced by the need to meet mandatory requirements by accepting inappropriate or poorly trained educators. The key is quality not quantity in order to ensure best outcomes for children.</p>
<p>What outcomes from ECEC are desirable and should be made achievable over the next decade?</p>	<p>Improved educational outcomes for young children – those than can be evaluated and measured to ensure the investment is achieving the desire outcomes.</p> <p>Increased skilled, experienced and qualified workforce - able to support the provision of an educational play based curriculum that meets the needs of all children.</p> <p>Improved support for children with high ongoing needs – training for educators and allied professionals so as true inclusion is achievable.</p> <p>Continuation of improvements of NQF – ratios for babies improved, continue to increase degree qualified educators beyond current requirements.</p> <p>Pay equity and conditions for educators that reflect that of their peers in a school environment.</p> <p>Appropriate adult to child ratios and qualification requirements for outside school hours care services.</p> <p>All early and middle childhood sectors to be included in the National Quality Framework.</p>
<p>International models of ECEC</p>	
<p>Information on International models of childcare that may be relevant to Australia.</p>	<p>It is imperative that international models are not just duplicated in Australia without taking into consideration the context.</p> <p>Nordic countries have in place affordable and accessible services for all children – funded through taxes so all the community supports education and care.</p>

	<p>Any model must ensure affordability and accessibility for families.</p> <p>It would be worth researching any <i>models</i> which are in line with beneficial, child focused ‘core principles’ and are producing better outcomes for children than what we are currently working towards (and the achievement of this system so far must be considered). A government system where all children have access to quality services (e.g. modelled on the Nordic countries) is definitely a model for consideration in the Australian context. There has been much research of the economic benefits of investing in the early years and this cannot be underestimated. Investment in the early education and care (childcare) must be prioritised as part of Australia’s education expenditure. There must be a national planning model to ensure there are services where they are needed. This needs to be streamlined to avoid red tape and delays in any approval system.</p>
<p>Demand for and expectations of childcare and early learning services</p>	
<p>Empirical evidence on demand for ECEC, in particular:</p> <ul style="list-style-type: none"> • 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? • Which types of families are likely to require significantly more or less use of ECEC in the future? 	<p>The economy in Australia has contributed to the need for both family members to be in the workforce. There has been an increase in demand for ECEC services to support increased workforce participation rates. The demand is across the board.</p> <p>The demand for care for children with high ongoing additional needs has increased dramatically due to a commitment to inclusion into mainstream services and the reduction of ‘special schools’.</p> <p>This demand increases and it is envisaged that this will continue into the future. There is also an increased demand from welfare and support agencies for ECEC services to provide ‘respite’ and ‘emergency care’. This is aligned to the pressures on families.</p> <p>Many families are unemployed, Tasmania, with an employment figure of 7% (National average 5.5%) and have returned to study. Again the hours or days available to them are not conducive with their needs.</p> <p>The government funded JET Child Care Fee Assistance is highly sought by eligible families. This assistance allows families to enter the workforce or to gain a qualification. Unfortunately the</p>

	<p>application process is not clear and often a long process for families when trying to access this assistance with the Family Assistance office. This often deters families as they need to pay childcare fees that they cannot afford while waiting for JET to be approved. Families working in the service industry i.e. fire/police/hospitality consideration needs to be given to affordability and accessibility and the current ECEC arrangements.</p> <p>Education and Care (childcare) should be more than who looks after the children while their parents/guardians work. Although education and care (childcare) increases women’s participation in the workforce, this should not be the only goal of an early education system. Children’s overall wellbeing should be that starting point for working out what is required to ensure a quality early childhood experience.</p>
<p>Children’s development needs</p>	
<p>Evidence on the effect of the different types of ECEC, including separate preschool programs, on children’s learning and development and preparedness for school.</p>	<p><u>Quality</u> preschool experiences supports children’s learning and development and readiness for school. So measurement of quality must go beyond the current Rating and Assessment requirements...more rigorous and focused on curriculum than compliance. ECEC integrated and co located on school sites can be beneficial to children as they become familiar with the school environment, affiliated with the culture and therefore makes the transition process more seamless.</p> <p>Early childhood teachers (in school settings 4-13 years) have recorded higher rates of development (focusing on general functionality and knowledge base) in children who have attended an education and care setting previous to the first year of school.</p>
<p>How does the amount of time spent in ECEC and the age at which a child first enters childcare impact on learning and development outcomes?</p>	<p>Regardless of time or age the key determinant is the <u>quality</u> of the program provided and the qualifications, experience and qualities of the educator and the ratio of adults to children. Children are born wired to learn.....they need an environment to support their learning and development. This means highly qualified and skilled educators are essential. Research validates this view – the better qualified the educator the better the program and outcome for children.</p>
<p>Would extending the length of the school day have a significant impact on children’s learning and</p>	<p>It is imperative that children are central to any decision making process in respect of extending the school day. Children must have a balance of structured and unstructured</p>

<p>development outcomes or parents' workforce participation decisions? What other impacts would such changes have?</p>	<p>experiences. While extending the school day may meet workforce trends...do we want young children in structured environment for longer periods. Will teachers be prepared/accept longer contact hours. Such a decision would impact on Outside School Hours Services – reduce demand and impact on sustainability.</p> <p>Universal Access (extending preschool/kindergarten from 10 to 15 hrs) - an initiative which was implemented without any evidence to indicate the additional hours impact positively on children's learning. Before any extension of the school day is considered an evaluation of the current initiative should be undertaken.</p> <p>Children's needs and rights must be paramount as opposed to families workforce participation needs.</p>
Impacts on workforce participation	
<p>What is the relative importance of accessibility, flexibility, affordability and quality of ECEC (relative to other key factors) in influencing decisions of parents as to whether they work or remain at home to care for children?</p>	<p>Affordability and accessibility are more important than the quality aspect in terms of decision making on work or not. Families realise they have a period (up to four years) of child care cost in order for them to remain in the workforce and retain their job.</p> <p>If the cost continues to rise many families particularly those working part time will make the hard decision of whether it is more economical to remain at home in the early years as opposed to working.</p> <p>Proximity of the service to work is preferred – families are reluctant (in Tasmania) to travel to services.</p>
<p>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?</p>	<p>Families ask about cost, availability and whether their child will be safe and secure. Quality and educational outcomes are not priorities – secondary to the cost and availability issues. In areas of high demand there is often little choice - they often take what care is available regardless of quality. Close to work is a priority to support journey to work issues and allow them to be more readily available if the child is unwell.</p>
Availability of childcare and early learning services	
<p>Evidence on the extent to which parents are</p>	<p>In Tasmania demand varies. Demand is higher in areas of positive employment levels, in</p>

<p>experiencing difficulties accessing ECEC that meets their needs/preferences and whether there are particular categories of care, times, locations or circumstances for which accessing ECEC is more difficult — for example, regional areas, certain days or part days each week, or for children with additional needs?</p>	<p>other areas vacancies exist. Difficulties exist in the toddler age cohort – paid parental leave has resulted in a ‘log jam’ around 1 year age. Child care becoming a service for younger children as many 3 and 4 year olds are being attracted to the private school early learning centres as they perceive these are ‘school’. It is widely researched and publicised that in having accessible <i>education and care services</i> available locally, increases the workforce participation rate for that local area. Families of children with additional needs have some difficulty in accessing ECEC services. The capacity and capability of the service to provide quality inclusive practices is a prohibitive factor. The cost to the ECEC service – ISS Funding does not cover the cost of the care – so the service contributes the gap fee. As the funding is increased not to the same level as wage increases and operational costs...the gap is getting larger and many services have internal policies regarding the number of children with additional needs they can accept. They are under pressure about discrimination from disability advocacy groups for such policies. Also the time taken to approve inclusion support application places undue pressure on the service.</p>
<p>Evidence on how parents identify vacancies or choose which ECEC service to use — for example, are parents aware that the My Child website (www.mychild.gov.au) and at least one privately operated website allows them to search for centres reporting vacancies and do they find this service accurate and/or useful?</p>	<p>Awareness limited of website. Some families report it is hard to navigate the site. Despite the investment by Government to the website, it is evident that the site does not hold accurate information. There is sometimes no choice...where a place available is the decision making process. Evident by families accessing services that have been unaccredited under the former QIAS system – only service with vacancies or only service in the area. Validates view that there is little understanding of ‘quality’. Word of mouth recommendations by others is the best tool for parents to identify services.</p>
<p>Information on how the sector has 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 the key barriers that are inhibiting an expansion in ECEC services where demand is highest, development of more flexible ECEC, or alternative models of care</p>	<p>Without capital investment to increase the number of services or expand current services – many community based operators do not have the finances to undertake development. The cost of the planning and application process is a further deterrent. LGT has developed a customised centralised waitlist database for all its services which has supported accurate waitlist data with the provision to glean specific information to support effective and effective placement of children.</p>

<p>approaches to managing childcare waiting lists that have been shown to be successful.</p>	<p>A waitlist newsletter is provided to all families seeking care – keeping them informed and maintaining accuracy of data plus general information about the organisation and parenting tips.</p>
<p>Information from employers that currently provide childcare services or assist employees to access childcare, on:</p> <ul style="list-style-type: none"> • the nature of the services or assistance provided • issues encountered in supporting employee use of childcare services. 	<p>LGT has a MoU with a couple of major employers. They secure a number of full time child care places for their employees by paying an annual reservation fee. This can be a full time place for one child or a couple of part time children fill the full time place. The parent pays the normal cost of care, but this guarantees key employees return to work which is a benefit to the employer.</p> <p>Arrangement with key employers to facilitate workplace information sessions on seeking ECEC places.</p> <p>Funding through a community grant to develop a “Choosing Child Care” brochure which is placed in Child Health Clinics, Maternity Hospitals.</p> <p>Internally employees children can attend the same ECEC service in which they work but not work in the same room as their child.</p> <p>Employees are entitled to a discount for child care fees for their child – part of the Enterprise Agreement.</p>
<p>Flexibility of childcare and early learning services</p>	
<p>The extent and nature of unmet demand for more flexible ECEC.</p>	<p>In Tasmania some service sectors (fire, police, and ambulance, hospital workers with rotating rosters and out of normal hours shifts) struggle to find ECEC to meet their specific needs. Family Day Care offers some flexibility but some families want choice including centre based care.</p> <p>In southern Tasmania there is unmet demand for ECEC generally –particularly in the city centre area. This is not about flexibility but just about obtaining a place. LGT accurate data indicates over 400 families currently need care in the Hobart area.</p> <p>Families don’t necessarily want 24 hour 7 days per week education and care. What they want is ‘tweaking’ of current operating hours to better meet the modern demands of work.</p>

<p>The reasons why current providers are not offering more flexible care options.</p>	<p>Flexibility costs! The industrial implications, operating costs increase, facilities need to accommodate extended hours care means investment. The workforce issues also prevent flexibility options – the ability to recruit and retain quality educator for ‘normal’ hours is problematic....so to attract them for extended hours or more flexibility was be more difficult.</p> <p>Trials implemented by our service some years ago not successful due to low utilisation. LGT is currently negotiating to establish a new centre in the Hobart area to meet some of the unmet demand. The Board Directors have agreed to allocate some of these places to accommodate flexibility and unmet demand for vulnerable children and families. The organisation is also negotiating with service industries to seek partnerships to establish a more flexible service model.....however the capital investment required establishing a centre is the key stumbling block.</p>
<p>The experiences of providers who offer flexible care options and their management strategies to maintain financial viability.</p>	<p>The cost of flexibility is a deterrent to providers. Family Day Care provides some flexible options but the viability is passed onto families by increased costs. Families then opt for ‘informal’ care with families and friends.</p>
<p>The outcomes of the Child Care Flexibility Trials and circumstances under which successful approaches can be replicated.</p>	
<p>Affordable approaches to improving flexibility, including innovative options that could involve new provider models.</p>	<p>The centre based requirements of 48 weeks per year, 8 hours per day stifles flexibility particularly in rural and remote areas. For example in our rural centre there is no demand on Friday...yet we have to remain open to comply with the requirements. The centre is in a tourist area so in summer it is utilised, but in winter months demand very low. The centre could consolidate bookings in these months and operate say 3 days per week to meet demand and thus remain more viable. Currently the centre is not viable and is cross subsidised by other programs.but if it closed the community would have no access to ECEC. This community need a flexible model but must have access to CCB/CCR to make affordable...flexibility needs to be two way (providers and government).</p>
<p>Services for additional needs and regional and remote areas.</p>	<p>Struggle to get qualified educators in these areas...so ability to include children with additional needs in the manner to which they deserve is problematic. Becomes respite</p>

	instead of true inclusive practice.
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.	<p>Cost is a significant prohibitive factor. Depending upon the service, families can feel intimidated. The documentation and declaration of information at times prevent this group seeking support.</p> <p>The sector is not generally qualified or skilled in the specialist areas to meet the demands of children with additional needs. Inclusion supported but must have the right people to provide the program for vulnerable and disadvantaged (indeed all children).</p> <p>All children have to right to be education and care for in an environment that supports best outcomes regardless of the situation.</p>
The extent to which additional needs are being met by mainstream ECEC services or specialised services.	<p>The sector is doing the best they can with what they have given the critical workforce issues – ability to recruit and retain suitably qualified and experienced educators, particularly in the area of inclusive practice.</p> <p>Some services struggle due to staffing, facilities, skills and knowledge of the term inclusion. They show empathy and support but that alone is insufficient.</p> <p>The expectation of external specialised allied health services is unrealistic and place further demand on the service and indeed educators.</p> <p>Services are fearful about discrimination and are often harassed and bullied into accepting children with additional needs when they do not have the staff or facilities to support true inclusion.</p>
Key factors that explain any failure to meet these needs what childcare operators and governments can do to improve the delivery of childcare services to children with additional needs?	<p>With a critical shortage of qualified, skilled and experienced educators, the ability to provide the most appropriate education and care for children with additional needs is problematic. Educators are not necessary experienced or trained in the specialist areas of inclusion and additional needs. The expectations of allied health support professionals are often unrealistic, the additional support is insufficient to ensure children are included and the program provided meets their identified needs. External allied health agencies have little understanding of the term inclusion and expect 1:1 support for children with additional needs. They need to have a better understanding of the ECEC sector and program guidelines.</p> <p>Educators training and support in specialist areas</p> <p>Shared understanding by all stakeholders of what can be achieved – realistically</p> <p>Provide inclusion support subsidies that cover the real and full cost of the additional worker support.</p>

The types of ECEC services which work particularly well and would be viable in regional and remote locations.	Flexible integrated models – based on the unique needs and context of that community e.g. seasonal workers
Cost of childcare and early learning services in Australia	
Information and quantitative evidence on financial difficulties arising from paying childcare fees, including the types or location of families experiencing the greatest difficulties in meeting childcare costs.	All families have some difficulty in meeting child care costs.
Changes in the use of ECEC, including the type of care used (formal and informal), in response to changes in the cost of care.	The ongoing increase in the cost has resulted in families having a 'patchwork' of care arrangements. Reduced their booked days at centre based care and use of grandparents or extended family to fill the gap. This is inconsistent for the child and places pressure on the grandparents who are tied to responsibility in their twilight years. There has been evidence of some extended families, rebooking the child back into care and paying the cost as they are unable to cope with the challenge of raising young children and prevents them from the planned retirement activities. Increase recently in families sharing a nanny – nanny at home caring for multiple children for a couple of families. Alternate house week by week and doing household chores such as cleaning, cooking etc. Where are the educational outcomes for children in this model?
The extent of price competition between providers and the effect this has had on fees and the quality of services provided.	In Tasmania prices are within market forces generally. Comparison made regularly to see where competitors are placed. Regardless of fees charges quality varies.
The flexibility providers have to price in response to demand and/or to meet the particular care and learning needs of children.	Some differential fee structures in place for young cohort – more expensive unit cost due to facilities and staffing ratios. Value added services such as music program etc incur additional cost to families.
Government regulation of childcare and early learning	
Up-to-date evidence, specific examples and case studies that will inform an assessment of both the benefits and costs of current regulations impacting on ECEC services.	Research is required to determine the unit cost of providing child care. We know profit is made...but the margins unknown. For any government supported program (CCB/CCR) there must be analysis about the cost of provision with benchmarking. Private for profit operators would not be in the market if there were not gains. Similarly not for profit operators would not continue without a profit margin.

	<p>Services have identified NQF as the rationale for increasing costs. There is no doubt this has increased some costs, but general operating costs (energy, insurance, superannuation increase water, WHS laws, food/drink etc) have contributed significantly to the increased costs.</p> <p>The NQF has not necessarily impacted on improvement to the ECEC sector. The workforce issues prevent progress. It is perplexing to analyse the NQS results, including the Excellence Rating, and question how these can be achieved when there is a critical workforce shortage including the quality of educators, a new system that will need time to understand and implement. It is not possible to achieve such high standards in the current environment. What price can one place on improving outcomes for children?</p>
National Quality Framework	
The effect of increased staff ratios and qualification requirements on outcomes for children.	<p>NQF welcomed and supported. The changes were required to ensure a raise in quality, but this has not been aligned with the workforce issues, therefore creating a wider gap regarding sustainability of quality.</p> <p>Ratios and improved qualifications are a step in the right direction in improving outcomes for children. However the critical workforce issues are preventing the outcomes. The quality of educators entering the sector is of concern – poorly trained and not work ready. Many RTO's are 'ticking and flicking' students – gain income without a great deal of effort or expenditure. The increase in distance and on line access for University degrees further exacerbates the issue. These students will be working with people face to face every day of their working life....if they are unable to communicate face to face, or do not have the interpersonal skills essential for the role then improved outcomes for children cannot be achieved.</p> <p>The NQF has so much promise and promises so much for children....but the promise and potential cannot be achieved unless the workforce issues are addressed.</p>
How ECEC providers are handling the pace of implementation of new staffing ratios under the NQF.	<p>Some are 'burying their heads in the sand'...doing what they have always done for decades!!! Many complaining but not actually doing anything about it.</p> <p>Others are proactive, committed and have embraced the NQF as they recognise the importance of the Framework.</p> <p>Leadership has been the key to positive implementation.....but this leadership is not always evident in the ECEC sector.</p>
The case for greater recognition and assessment of	Some aspects of training can be recognised and assessment through competency. However

<p>competencies as an alternative in some cases to additional formal training and qualifications.</p>	<p>key foundation k knowledge must be gained through formal training and not RPL or RCC. Training in groups with peer professionals allows discussion, debate and networking. It is imperative that educators have theoretical knowledge and understanding of how children development and learn.</p>
<p>The impact of changes to staff ratios and qualification requirements on the cost of employing ECEC workers.</p>	<p>It has increased the cost – but at what cost does one place on ensuring children have the best chance for optimal development. LGT has had in place a workforce development plan to support the increased requirements although the organisation has always committed to working above minimum standards. So the cost increase has been minimal. The greater increase cost factors have been operational costs – energy, insurance etc.</p>
<p>Whether any increased staffing costs have been, or will be, passed on in higher fees charged to families.</p>	<p>The increased staff requirement has increased the cost of service provision. Some services have been able to absorb the increases by budget analysis and workforce planning. Others have used it as the rationale for fee increases. But it is a combination of increased staff costs and general operational costs increasing. For example new WHS legislation has been costly, now have to pay for water, superannuation guarantee increase etc.</p>
<p>Initiatives of governments to address workforce shortages and qualifications, including the cost and effectiveness of these initiatives.</p>	<p>Sadly some of these great initiatives have been seen as a simply income revenue by many RTO's. Lack of integrity in delivering high quality accredited training with assessment not as rigorous as needed. The compliance of RTO's has been poor. For example: a number of service providers complained about the lack of ethics and integrity of an RTO and the response by the regulator was....yes we know about this RTO and have had several complaints. But no action!!!! Generous initiatives that have been abused and not supported the improved quality outcomes for children and aims of the Reforms. They may have addressed the quantitative issues but not the quality issue.</p>
<p>Initiatives of providers to address their workforce shortages and skill needs, including the cost and effectiveness of these initiatives.</p>	<p>Our service has had in place a workforce development plan to address workforce issues. Internal scholarship program, interest free loans for accredited training, strong commitment to paid professional development all been effective and resulted in the need for less expenditure on selection of new employees. Teacher recruitment has been more challenging – wage and condition parity with school environment an issue. Plus many teachers want to work in a school environment as opposed to child care setting – status! Teachers struggle with the ECEC environment – being a team member and expected to share all tasks/functions of the role, working in a birth to 5 cohorts -</p>

	<p>which has not been the case in the school environment.</p> <p>Despite a commitment to address workforce issues....if an educator is not performing to meet the expectations of the service...then they know they can get a position elsewhere due to the critical shortages. It becomes a revolving door!!!!</p>
Particular locations and areas of skill for which it is hard to find qualified workers.	<p>Qualified workers are hard to find in all areas. There is a transient process where educators move around seeking best deal (wages and conditions) and if they are pressured to perform they move to the next centre as they know there are a critical skills shortage and the sector desperate for qualified educators.</p> <p>A greater challenge in rural areas – try to find a motivated people who are settled in the area and prepared to undertake training. The lack of mentorship and on the ground support makes it hard to remain motivated and retain educators.</p>
The extent to which training/childcare courses enable workers to meet the requirements of the NQF and how training could be improved.	<p>PSC Tasmania has been diligent in supporting services with understanding of NQF. Some services adopted ‘head in the sand’ attitude, others want to be told how to do NQF. Lack of professionalism and commitment to personal learning of great concern.</p> <p>Some RTO’s have little understanding of the NQF, and many facilitators are not from the sector so little experience and knowledge of ECEC.</p> <p>There is evidence of some RTO’s still quoting the former QIAS system which was replaced by the NQF years ago!!!</p> <p>How can educators gain a strong understanding of the requirements when incorrect information is being shared and used as course content?</p> <p>More rigour and compliance of RTO’s essential.</p>
Other workforce and workplace issues, including any aspect of government regulation that affects the attractiveness of childcare or early learning as a vocation.	<p>It is a challenging (and rewarding) profession but educators do not receive the recognition in wages/conditions or status and standing when compared to colleagues in the school sector.</p> <p>Career planners often suggest E&C as career when no other options or can’t get into teaching degree. E&C used as a stepping stone to degree and then onto school environment.</p> <p>Inconsistent regulations between E&C and Schools. In Tasmania Kindergartens not part of the NQS.....divisive and places Kindergarten as exclusive.</p> <p>Wage parity and professional recognition are essential to attract entrants to this profession.</p>
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?	<p>Focus by assessors is compliance. The important and key aspects of NQS not as focused by regulators.</p>

Could the information provided 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?	
How particular regulations (including the NQF) impact on the structure, operations, cost and profitability of ECEC services — for example, are services consolidating or amalgamating their operations to reduce administration costs.	For years this organisation has implemented a central system for operational aspects which has reduced costs and made savings. This has resulted in no fee increase for 2 years - increased operational costs absorbed. Sadly operators are territorial when they could combine forces to make savings and streamline processes. Services with CBC and OSHC have one service approval – reduces documentation and administration.
The share of fees that can be attributed to compliance costs (quantified if possible).	
The extent to which regulatory requirements are causing services to change the number or mix of children they care for.	
The extent to which regulatory burdens arise from duplication of regulations and/or inconsistencies in regulations across jurisdictions.	Inconsistent not only across jurisdictions but also with a State. Too much repetitive paperwork. As a multi service provider the requirement to complete individual forms for some aspects of administrative is not an effective and efficient use of time and resources. .
Government support for childcare and early learning	
How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?	The current funding of CCB and CCR is disjointed a confusing to families. Combining the funding into one funding model and paid directly to service to deduct from the cost of care would be more efficient and provide Government with the kudos it is not getting as families do not equate CCR to reducing cost of care. It is often used for other purposes.
Is the level of overall government support for ECEC appropriate?	Services receive no direct funding to support service delivery other than Sustainability Funding which is provided under a strict criteria. Fully funding the cost of the additional worker for ISS is essential. The IPSP funding has not increased in line with the increased number of services or the

	increased number of children with additional needs being included into mainstream services. ACECQA role appears to be unclear and overlapping with other funding support
Is it difficult to apply for or receive financial assistance for childcare?	Complex for families – Centerlink system frustrating and confusing for families.
Is it straightforward to determine how much financial assistance a family will receive?	Complex as due to CCMS services can only estimate cost based on family information provided at that time.
What effect have government support for childcare and other family income support arrangements, such as paid parental leave and family tax benefits, had on demand for ECEC?	Paid parental leave is beginning to impact with the age demand now not as pressured for infants but more for toddler age cohort. Paid parental leave is allowing families to remain at home longer before accessing ECEC services.
Have increases in support reduced the out of pocket cost of childcare for parents, or have fees just risen in response?	Fees have risen beyond the increased support level. However, in Tasmania, for some families the cost of care can be as little as \$17 per day.
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?	Some cases of overlap with CCB/JET and duplication. There are reports from families about inconsistencies when dealing with the Family Assistance Office.
Do existing arrangements for delivering support present any difficulties for ECEC providers in assisting families with resolving eligibility or payment issues?	The current arrangements provide a challenge as services have no access to families CCB as this is generated through the CCMS system.
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?	CCMS has minimised paperwork – depersonalised the issues with manual submission of CCB data. JET Child Fee Assistance is highly sought by many families as it allows families to enter the workforce or study. The application process is not clear and often a long process for families. This deters families as they have to pay full fees whilst waiting for approval of JET.
Options for reform of childcare funding and support	
How could government support programs be reformed to better meet government objectives for ECEC?	
What financial contribution should parents is expected	All families should make a contribution to E&C as if no payment at all it is not valued. Low

to make to the care and education of their children?	income and vulnerable should pay less than higher income groups.
To what extent should governments subsidise use of childcare and early learning? Should families reasonably expect to receive childcare support in addition to paid parental leave and family tax benefits?	If no subsidy for ECEC then it would not be affordable for families and impact negatively on workforce participation and the economy would suffer. Support to services to support wage parity for diploma and degree qualifications - to pass this onto families would increase costs further. Families should receive support such as family tax benefits and paid parental leave. Families with young children need as much support as possible in the early years. Paid parental leave is a short term and not ongoing and support families spend more time with their infant in the early months after the birth.
Is there scope to simplify childcare support? What changes could be made to the way childcare support is administered to make the process easier for parents or providers?	Combine CCR and CCB to a single payment. Pay direct to the service to reduce the cost of care.
Is the distinction between approved care and registered care necessary?	
Should support be paid directly to parents, direct to ECEC services or some combination of these?	Directly to services to ensure the funds are used for the intended purpose – to reduce the cost of care and support viability of services by reducing bad debts.
Where funding is paid directly to operators of ECEC services, what conditions should apply?	Ensure the funding is used for the intended purpose. Compliance and monitoring for accountability.
What would be the advantages and disadvantages of different payment models?	One payment system incorporating both CCR/CCB would be simpler for families.
Should childcare assistance be subject to testing of family/parent income levels, or to other requirements such as a necessity to be participating in work, study or training? If so, what income thresholds or activity levels should determine eligibility? To what extent are such requirements currently abused? What are the advantages and disadvantages of such requirements?	To ensure a fair and transparent process income testing for all families. PAYG employees are often disadvantaged compared to those who are self-employed and can 'write off' items to reduce income for the purpose of tax and means testing. The funds must be distributed to those in greatest need.
Should childcare expenses be tax deductible for families?	Yes..if it is work related expense.
Is support appropriately targeted? If not how could it be better targeted (including less targeted)?	
Should a greater (or smaller) proportion of the	Fairness and equity for all.

<p>assistance be directed to: particular regions; particular types of ECEC; ECEC used for particular purposes — parents working, studying or undertaking other activities; or to support additional needs children or lower socioeconomic groups?</p>	
<p>Is there scope to streamline and simplify access of providers to support arrangements for children with additional needs?</p>	
<p>Should support be extended to cover certain types of childcare not currently funded or to increase funding for specific types of childcare — for example nannies providing in-home care? If so what kind of support should be offered? What conditions, for instance accreditation requirements, should apply to such funding or funding increases?</p>	<p>Nannies and in home care – like Family Day Care this care provided in homes must be regulated to ensure the health, safety, well being and educational outcomes for young children regardless of funding support or not. If CCB/CCR extended to these forms of care it means reduction in support for families using mainstream services as the government funding envelope is not the extended (quoted in the PC info). They must then comply with NQF requirements. This would increase the support required through current funding (IPSP, ACECQA) and also at State/Territory levels with regulatory authority taking on extra work.</p>
<p>What measures, if any, should governments consider to encourage employer provided childcare services?</p>	<p>Incentives to employers:</p> <ul style="list-style-type: none"> • Capital grant program • Tax deductions/incentives for employer provision
<p>Is there scope to rationalise and streamline the many types of funding provided by the Commonwealth or state/local governments?</p>	<p>In terms of efficiencies and effectiveness, streamlining types of funding provided by all levels government is encouraged. When different types there is always administrative costs. So streamlining would centralise administrative functions thus better use of the funding.</p> <p>In any streamlining process, it is imperative that the intended purpose is not lost and no reduction in funding to support services or indeed families.</p>
<p>Any other comments:</p>	

Submission developed in consultation with families, educators, and staff at Lady Gowrie Tasmania.

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