

Productivity Commission Submission ECEC Uniting Early Learning February 2024

- **ECEC Workforce** - The productivity commission paper acknowledges a need for attraction and retention strategies for the EC workforce, and attends of supply issues with recommendations of the adoption of accelerated programs. Aspects of the workforce challenges mentioned in the draft report are limited to wages, professional development and upskilling programs.
We support all recommendations DR 3.1-3.7, however note that no further attention is paid to understanding or redesigning the role of early years educators. There is no plan to assess or review the conditions under which early years educators work; the workload, grouping arrangements, documentation requirements, non-contact time provisions. The challenges of early childhood workforce retention cannot be addressed without this. This would require a national review and is beyond the scope of a single early learning provider.
- **Terminology** - We invite you to reconsider the language of 'Dedicated Preschool' as a description of kindergarten alongside CBDC. Concepts of kindergarten programs have developed much over the last five years, and the language used in the report displays a bias/preference towards preschool programs by virtue of the term 'dedicated'. It was noted in the report that CBDC increasingly offer kindergarten approved programs, these could be better signified than being pooled in the day care category. Legacy terminology is very persuasive in the ECEC community, and continuing to divide CBDC and Dedicated Preschool supports those older constructs of kindergarten, where stand alone is perceived as 'better' than accessing a long day of kindergarten. In the sector we have made careful steps to move on from these historical norms, and it would be supportive if high-quality kindergarten in Integrated, Long Day settings could be held in equal regard to stand alone kindergarten programs in this report.
- **Draft Recommendation 8.1, 8.2** - We support the recommendations to improve regulatory authorities' performance reporting (DR 8.1) and the recommendation to review how services are assessed against NQF (DR 8.2). As a provider of ECEC, we would like to see greater continuity in the application of the NQS scoring during A&R processes.
- **Draft Recommendation 7.6** - We openly support the report's support of expanding preschool hours to support families to both access ECEC and participate in the labour market.
- **Draft Recommendation 5.5** - As a provider of FDC, we support draft finding 5.5 and agree more could be done to enable FDC providers to service thin markets or places with variable demand. Lifting the profile of FDC educators as early learning professionals is also an important future step in diversifying ECEC care models across the country.
- **Draft Recommendation 3.1** - The likely wage increases for educators as part of the Fair Work Act review should be funded by governments, not families. This should be a priority use of public funds. The education of the nation's children depends on continuity of care from highly trained early learning professionals. Prioritising this as worthy of public funds would help to a) raise the importance of early years education for children, and b) offer an explicit profile lift for EC educators more akin to teachers within the primary sector. If wages were deferred to families via an increase to provider fees, this would create further disparity in teaching quality and thus, overall centre quality for children.
- **Draft Recommendation 3.2** - While we support the finding, the accelerated model continues to be imperfect and has short term and long term implications for early learning providers. One challenge for services is providing access for diploma candidates to engage in the program, especially in cases where more than one candidate within a centre is enrolled in the accelerated degree at the same time. Often, programs have strict timelines and locked dates for internal placements which can create centre-based challenges around the approved leave of mentor teachers and other staff, and the arrangement of staff across the service (this affects continuity of care for services, particularly a problem for teams

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that work under a key-educator model for children). The long term impact of accelerated degrees are bachelor holders acquiring roles with clear knowledge gaps that must be attended to through professional development. In this way, the capacity building of the ECT is still required but is deferred to their post-qualification period, leaving the employer to either offer the upskilling themselves through internal PD, or backfilling the time for the ECT to attend external training, affecting the continuity of care for children in the program. Limits on non-contact time within enterprise agreements also make it difficult to facilitate.

Learning on the job is an adequate solution for the sector, but means teachers often feel ill equipped and asked to work without the skills they need to be competent in their role, creating stress for individuals. When underprepared ECTs entering the employment pool – this creates a short term solution that improves service’s ability to staff according to regulations, but simply postpones the dilemma of upskilling, education and training, rolling these responsibilities onto employers.

- **Draft Recommendation 3.7** Strongly Agree
- **Draft Finding 2.7** Strongly Agree - Subsidy Rates are not valued at contemporary wage rates which creates a funding gap which must be pulled from elsewhere. It is a barrier to services accessing the Additional Educator for the purposes of inclusion.