



Dear Productivity Commission,

Thank you for this opportunity to make a submission to the Early Childhood Education and Care (ECEC) Inquiry. We commend the scope of the inquiry and look forward to policy outcomes that better recognise and enable the vital role of early childhood education and care for the economic and social prosperity of this nation.

We write this submission from the perspective of a parent committee of Sandgate Kids Early Education Incorporated (herein *Sandgate Kids*) in consultation with the service managers and business manager of Sandgate Kids. As a not-for-profit association registered with the Australian Charities and Not-for-Profits Commission (ACNC) Sandgate Kids consists of two long day care centres (both inclusive of kindergarten programs) and a standalone kindergarten and has held a central role in childcare and education in the local community since the 1970s. Our vision is to support families and the community. We empower children with a strong sense of self and community connectedness. We provide the foundations for lifelong learning.

In this submission, we focus on the principles of accessibility, inclusion, and participation and touch on the following aspects outlined in the inquiry's terms of reference:

- Affordability of, and access to, quality ECEC services that meet the needs of families and children,
- Efficiency and effectiveness of government investment in the sector,
- Impacts on demand, supply, and fee growth, and
- Enabling workforce participation.

## **Recommendations**

Based on the experiences and observations of Sandgate Kids in regards to ECEC, we make the following recommendations in this submission:

1. We encourage review of the clarity and access of the Additional Child Care Subsidies (ACCS) and suggest that providing service managers with authority to grant 13 weeks ACCS again would increase the accessibility of the ACCS.
2. In terms of the Inclusion Support Program (ISP), we make the following suggestions:
  - a. Simplify the current application process that we have observed being overly complex, and
  - b. Streamlining the calculation of the allocation of additional support and hours which we have observed is an inefficient use of resources due to being time consuming and must be regularly repeated. We have also found the current ISP guidelines limited in terms of the hours that we can reclaim.
3. Review the success of the new provisions in the *Secure Jobs, Better Pay Act 2022* in relation to ECEC in two years' time, to ensure ongoing commitment to equal remuneration and work value.
4. Explore modern approaches for ECT qualifications, especially in respect to completing practical hours.

## **Addressing terms of reference**

### **Accessibility**

We suggest that efficient and effective government investment in the sector focus on fairness, by ensuring affordable fees for all children. This could include consideration of increasing the kindergarten hours that are covered by funding.

**Brighton Road**

132 Brighton Road  
Sandgate QLD 4017  
07 3269 1937

**Nash Street**

106 Nash Street  
Sandgate QLD 4017  
07 3269 7895

**Kindergarten**

132 Brighton Road  
Sandgate QLD 4017  
07 3269 9537

Another efficiency measure could be evaluating regulations that currently present barriers to access. For example, restrictions to kindergarten access age as an option for all centres. We would like to see the access age lowered to include three-year-olds as we have experienced this as an existing barrier to accessing our services.

We would also like there to be clear steps on how families can access Additional Child Care Subsidies (ACCS), especially how this financially impacts families. In connection, a current barrier is that services managers are not able to grant 13-week ACCS to families, making the process unnecessarily cumbersome. We recommend that the government reviews the clarity and access of the ACCS, and provide service managers authority to grant 13 weeks ACCS again.

In terms of demand and supply we would also like to highlight the long waitlist that Sandgate Kids has as an indicator of high demand and low supply. Across both long daycares and our C&K kindy we have an average occupancy of between 96%-99%, typically with limited space only available in the kindergarten rooms. Wait time for many families is frequently one year or longer, especially for families hoping to access care for babies, toddlers and pre-kindergarten children. Overall we view this as an indicator of high demand in our local area and low supply.

## **Inclusion**

Sandgate Kids highly values the Inclusion Support Program (ISP)<sup>1</sup> and the additional funding provided by the Australian Government to assist education and care services to provide and embed quality inclusive practices into their delivery of early learning programs for all children, to address access and participation barriers and to support the inclusion of children with

---

<sup>1</sup> Australian Government Department of Education. 2023. Inclusion Support Program Guidelines.  
<https://www.education.gov.au/child-care-package/resources/inclusion-support-program-guidelines>



additional needs, with their typically developing peers. In connection, we would like to highlight the importance of revising inclusion measures to improve accessibility for all families and children. This includes:

- Simplifying the current application process that we have observed is overly complex because currently the application must be written to support all children who attend the service even though we are using one child's diagnosis for the application.
- We also suggest streamlining the calculation of the allocation of additional support and hours which we have observed is an inefficient use of resources due to being time consuming and must be regularly repeated. We have also found the current ISP guidelines limited in terms of the hours that we can reclaim. This is because the center can only reclaim for the hours the diagnosed child attends the service. Therefore, if the child is sick unexpectedly the service has to cover the cost of the support worker.

Not having any access to funding and/or inclusion support services for all children that need it applies extra pressure to services and staff who are delicately managing the situation and causes additional pressure for the child and families of children with additional needs who are often experiencing higher levels of stress and emotion.

## Participation

To emphasise the importance of workforce participation, and of the importance of a government framework that ensures more than adequate working conditions for early childhood staff we would like to share results from our 2022 parent satisfaction survey. We asked respondents to rate our strengths, the majority of responses (53%) indicated that the staff are our biggest strength.<sup>2</sup> The open-ended responses emphasised that our educators

---

<sup>2</sup> In total, 58 responses were received sharing thoughts about the strengths of Sandgate Kids. Many parents listed multiple strengths, with a total of 120 strengths discussed that relate to



are caring and supportive, and the strength of having a great management and administrative team. For example, one quote being:

*Caring and quality educators - they make the centre a happy, caring and safe environment for the kids to come to every day. Our family is so aware of this after attending a couple of other centres, and we are so grateful to all the educators. (Parent survey response, 2022).*

Given the incredible level of trust and responsibility that we place on early childcare staff, it is necessary to acknowledge the various observed challenges.

Currently, childcare educators earn substantially less than other types of educators which has flow-on effects such as difficulty in attracting and retaining quality staff. In several instances, Sandgate Kids have been unable to appoint appropriate qualified people to permanent positions, and they have been left vacant for a period due to staff shortages or have been backfilled by casual educators working towards a qualification.

Sandgate kids acknowledges the new provisions under the *Secure Jobs, Better Pay Act* 2022, and appreciates the opportunity to access equal remuneration and work value and supported bargaining reforms to assist ECEC workers to bargain for an improved enterprise agreement. However, negotiating enterprise bargaining agreements can be timely and this not only creates uncertainty for staff working in the sector but also fails to address the short-term staff shortages.

There is also the potential for unmet expectations, as the reforms were designed specifically for care-based sectors where wages have historically been lower and workforces have been

---

the following five areas (in order of most discussed): Staff (53%); Community (18%); Environment (13%); Pedagogy/ learning approach (12%); Resources (3%).



female dominated. It is hoped that the new reforms will lead to more equal pay and attract workers to the sector, addressing the sector-wide issue of ECEC staff shortages.

Additionally, we have observed that there are barriers for students undertaking early childhood training. For example, currently universities require that students complete unpaid practical hours of work experience. We would also like to comment that the option of a prac swap has not been suitable for Sandgate Kids due to being a small service. To increase ECEC workforce participation at the ECT level, we believe that a more modern approach be considered by regulators and universities to better support students gaining practical experience.

In regard to workforce requirements we hope that the Inquiry consider the following:

- Review the success of the new provisions in the *Secure Jobs, Better Pay Act 2022* in relation to ECEC in two years' time, to ensure ongoing commitment to equal remuneration and work value.
- Explore modern approaches for ECT qualifications, especially in respect to completing practical hours.

## Conclusion

Thank you again for this opportunity to contribute to the ECEC inquiry. Our submission has focused on the principles of accessibility, inclusion and participation and we have made four recommendations to consider.

**Brighton Road**  
132 Brighton Road  
Sandgate QLD 4017  
07 3269 1937

**Nash Street**  
106 Nash Street  
Sandgate QLD 4017  
07 3269 7895

**Kindergarten**  
132 Brighton Road  
Sandgate QLD 4017  
07 3269 9537

