



Submission

Productivity Commission – Response to the Draft Report into Child Care and Early Childhood Learning

Submitted on behalf of Explore and Develop

Written by Jenny Mays – CEO

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I would like to start our submission acknowledging and appreciating the consultative approach that the Productivity Commission has taken in this process. As a participant in the process, and taking part in the hearings, it has been encouraging to see a voice from many part of sector offer advice and views on the issues which are being considered for change in the Draft Report process.

In our submission I will comment on a number of areas, which I hope can give perspective from an Operator in a LDC Service. I am happy to expand on any points should the Commission require this in the future?

By way of introduction, Explore and Develop is a franchise model made up of 22 operating LDC Services in the greater Sydney area reaching from the Central Coast to the west with sites in Penrith and Glenmore Park, the inner west and the Northern Beaches.

Our locations can be found at <http://exploreanddevelop.com.au/regions/>

All services are owner operated and Approved Providers are required to be on site for more than 50-60% of the operating hours which allows us to relate to staff, parent and the child needs of our businesses.



My submission opens with comment on the consideration of separating "Pre-School" from the LDC under the NQF. Services that provide Education for 3-5 year olds have the guidance of the Early Years Learning Framework and all the components of the NQF. The application of the "curriculum document" and the "NQF guidelines" only differs as a result of the quality of the Service. On an operating basis LDC can and many do offer the same curriculum for preschool aged children just in an extended hours setting for working families. As such, I see no logic in treating these structures differently other than allowing Preschool to work outside of a compliant environmental and to confuse parents. There has been significant improvements in consistency of program delivery as a result of the changes for Preschool joining the NQF processes and it would be disappointing to see this be reverted so soon.

In relation to the points raised in the Report around the A&R process. Whilst I see some great steps forward and fully support the need for a framework of quality to run our Services by, we continue to see subjective interpretation of the data. DEC offices continue to say on site "in my opinion" you should do it this way or "this means x when it clearly states y"..... We are consistently changing "medication forms", "excursion documents" etc when A&R visits are completed at our Services as a result of the opinion of an A&R assessor. More training and cross training across Regions is required in this area.

Furthermore, the measures used where one strike and you're out is completely unfair. Being rated well in 57 elements and then receiving a "Working towards rating" overall seems ludicrous. I have heard this expressed at NQF review meetings and again at your Hearings. Some adjustment would most definitely change the enthusiasm of Services to participate.

The hottest point of discussion I note has been the reduction of the qualification requirements for Services with children in relation to the under 3's. At the hearings both Macquarie University and Charles Sturt all offered their opinions and had indicated that their research would be made available to the Commission.

The staff shortage in the sector means that this point might be supported by some but putting this aside I have to suggest that the knowledge base obtained



from completing a Bachelor of Education cannot be ignored against the content of a Certificate 111 qualification. Typically also a certificate 111 employee is more than often just entering the sector and would be of the age of 19. If we create a sector where caring for babies is predominately managed by humans under 21 years of age then I believe this will pose a significant risk to children and families in the future.

Furthermore, I support the point raised at the public hearings where it was voiced that by employing less skilled workers is a false economy. Children's development and the recognition of developmental delays has improved significantly over the last decade. Early Childhood settings offer an early alarm for children needing intervention support. Experienced and qualified Educators have the training to assist children develop their speech, their movement and their social interactions, removing these professionals from the sector would ultimately result in the calling on other resources such as ISP, Speech therapists, Occupational Therapist etc. and this would result in increased cost in the system rather than less. We felt this was a really valid point.

Experience is also not to be ignored and Educators can perform better in the workplace if they are committed to Professional Development.

I would like to suggest to the Commission that a requirement for Professional Development (PD) be part of this consideration. Many other sectors approach this by requiring a minimum number of hours per year of professional development be completed to remain current within their profession. I could see this as proactive way to keep Educators in the Sector current and informed.

The next point is considering funding for Nannies. Everything considered the incentive to work 1:1 with a child for a higher salary than a Service operator can afford will see qualified staff moving to these roles. If parents receive CCR then this is a likely outcome. Asking Nannies to comply with the NQF if funding is being taken is humanly impossible. The development of systems, delivery of documentation required would be very difficult and would take away from the time with the child so it all seems counter product.

One consideration could be that CCR could be made available to families who can prove they are working in a non traditional environment that requires care for their children outside of the operating hours of most Services such as shift



workers. This is an area where families need support and the traditional models of LDC's are costly with overtime rates for staff etc.

In relation to qualified Staff being averaged over the week. I believe some better clarity needs to be offered around this recommendation. There appears to be a number of interpretations of this point so perhaps it needs to be more prescriptive such as "an ECT be available daily for a minimum of 6 hours 3 times a week" or whatever the interpretation is would add some clarity?

Lastly the discussion around pay equity is an important one and one I appreciate is hard to resolve. The variation between Primary paid teachers and Early Childhood teachers is a key factor (as is longer holidays) in ECT's not being attracted to the Sector. Both complete the same degree. The message this sends is that teaching in Early Childhood is less valuable than in Infants and Primary? Research states otherwise.

Thank you very much for taking the time to read through our submission and as stated earlier I am available for any consultation regarding LDC settings post this process if you feel it appropriate?

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www.exploreanddevelop.com.au