

Dear Productivity Commission,

After reviewing the draft recommendations of the Productivity Commission Inquiry into Childcare and Early Learning, I'd like to submit my support and concerns for some of the recommendations.

I support the following recommendations:

- Simplifying the current subsidy system
- Diverting funding from the proposed new Paid Parental Leave scheme to early childhood education and care. Access to quality, affordable care is the most significant obstacle my family faces to workforce participation by both parents.
- Improving access of children with additional needs, disabilities or "at risk" children to ECEC services. This should extend to families as well. Eg if the mother has cancer and is in hospital, there should be extra funding for the child to attend an ECEC service.
- Increased investment in subsidies for low income families.
- Ongoing funding by the Australian Government for universal access to 15 hours of preschool. This should include any service that provides care and education in the year prior to school
- Extending the scope of the National Quality Framework to include all centre and home based services that receive Australian Government assistance.
- Implementing a nationally recognised working with children check.
- Requirement for all schools to take responsibility for organising the provision of an outside school hours care service. This could be in conjunction with a service provider in the area.
- Changing the qualifications for children under three to be a certificate III. Provided that there is sufficient guidance from a Diploma or higher qualified staff member, a Certificate III should be able to care for this age group. Many parents are taking excellent care of infants without any qualifications whatsoever. Of course, the higher the qualifications of the staff, the more likely that service will get a higher rating upon assessment.
- Removing not-for-profit services from the FBT and payroll tax exemptions and rebates.
- Tailoring the NQF for OOSH services. There is no need for OOSH services to come under the NQF. As a parent, all I would want to know is that my child was in a safe place after school until I can pick them up after work. I don't need portfolios or a curriculum for them at OOSH.
- NSW adopting the three month probationary period for new staff. There is no point in starting all the paperwork and training for someone who realises after a month that this is not the job for her.
- Redesigning and simplifying the rating system and abolish the Excellent Rating.
- Abolish Certified supervisor certificates
- Reducing paperwork – stringent record keeping of "contact time", "break time" , "responsible person" etc does not encourage a smooth, stress-free day for staff or children.
- Local governments should adopt regulatory practices for ECEC services. In the same way that there is a requirement for a primary school to exist in each jurisdiction, there should be space allocated for ECEC services (including for-profit services)
- Ensure higher standards for Registered training organisations.

I do, however, disagree with the below recommendations. I would not regard their implementation as in the best interests of families and children, in particular children's rights to access quality education and care:

- A universal "deemed cost of care". The cost of providing care varies hugely depending on the location and type of care. A means-tested percentage is more equitable.
- Allowing services to temporarily operate with staffing levels below required ratios by averaging over a day or a week

- Allowing subsidies for nannies and au pairs. This is almost impossible to monitor. Any taxpayer would object to subsidising what could be “domestic help”. How can you monitor whether the “nanny” is doing housekeeping and errands?
- Any additional qualification or staff ratios for school age children. These children have spent around 6 hours in an education setting and only need a safe place to be until their parents can pick them up. A responsible person to supervise them is enough. In most instances the child may only be at the service for half an hour a couple of days a week.
- Simplifying the National Quality Standard and identifying standards or elements that can be removed or altered while maintaining quality outcomes for children.
- Removal of preschools from the scope of the NQF.

Further, until there is an adequate supply of University trained 0-5 year Early Childhood teachers (who cannot go on to work in a school setting), the requirement to have ECTs on site for 6 hours a day should be removed for smaller centres (under 40 children).

Universities should be given incentives to have more 0-5 years Early childhood degrees instead of the 0-8 or 0-12 year degrees.

Thank you for taking the time to read my submission.

Regards,
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