

3 September 2014

Childcare and Early Childhood Learning
Productivity Commission
Email: childcare@pc.gov.au

To whom it may concern,

Thank you for the opportunity to comment on the draft report into Childcare and Early Childhood Learning, in our comments we have limited our submission to issues pertaining to preschool education, as this is our area of expertise.

Draft Recommendation 7.1 – we agree with the comments made that NQS needs some adjustment and support the draft recommendations outlined in 7.1, making the NQS less cumbersome would improve administration of the agency.

Draft Recommendation 7.5 – we found this recommendation confusing and unclear; however taking it at face value, we do not support the recommendation allowing services to temporarily operate with staffing levels below required ratios. A large class size requires the attendance of two or more teachers, especially if an incident was to occur – it is too greater risk for any facility to operate with less staff. Maybe further clarification of ‘temporary’ is needed.

Draft Recommendation 7.6 – we agree with the comments made on the assessment process and support the draft recommendation to improve the assessment and rating system, we found the assessment and rating system confusing when our agency was assessed.

Draft Recommendation 7.7 – we agree with the proposal outlined in this recommendation, it appears a sensible approach to improving the NQF.

Draft Recommendation 7.9 – we are unsure whether removing stand-alone preschools, such as our agency, from the NQF is an appropriate recommendation, our agency has now fully implemented, and been assessed through the NQF, although the Commission feels that it would reduce burden, but it does not seem a sensible decision especially if changes are going to be made to NQF as recommended in 7.1 and 7.6. It would appear more of a burden changing to ‘another’ system! It is our belief that maintaining a national system appears the more sensible option in maintaining a consistent educational system.

Draft Recommendation 12.9 – we strongly support this recommendation to continue the financial support from Government to preschools to maintain the educational component of 15 hours per child per week. Without this support, our agency would have to make some severe choices on either reducing contact hours for the children, thus not reaching the required 15 hours requirement, or reduce staff numbers – either way it’s not a desired option for our agency, and in the long term would impact the viability of the service.

We hope you find these comments of value into your consideration of the final report to Government.

Kind regards,

Alison Gibson
President, Boroondara Preschool Committee of Management

Boroondara Preschool

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