

## **Productivity Commission**

### **Statement position: Blandine Vallee & Rhys Hughes**

Overall, we believe that these recommendations to increase affordability will actually negatively affect the quality and safety of Australian childcare. Affordability attained by subsidies to facilitate the development of not-for-profit childcare services and not to support private childcare companies whose sole interest is profit and not the quality of the services.

We think Families need quality childcare to be able to leave their children whilst working.

We believe that reducing certification standard of carers will negatively impact the quality of childcare in Australia.

Means testing reduces the incentive for women to return to work, especially where the increased family salary with the second partner working may remove government funding, and therefore remove all financial benefit of the second partner returning to work.

Childcare in Australia should increase their quality and reduce the cost for families by increasing government funding. Families are paying twice for childcare, in their taxes and then from their salaries, when working families should be supported.

### Optimizing children's learning and development:

- **Qualifications for staff working with children aged birth – 3 years> requirements be lowered.** Removal of diploma staff and employment only of those with 6 month child care certificate.

Contrary to the claims of the draft report, we support KU who believes there is substantial evidence that support the need for higher qualifications amongst staff working with our most vulnerable children – those in the 0-3's group. KU will be providing the Commission with evidenced based research in relation to their position.

At KU Treehouse there are 4 diploma educators working in the nursery and toddler groups (birth – 3 years). We have our son Pablo staying in this group and we wouldn't let him to a group without those qualifications.

It is known, and demonstrated through research that:

- Children need responsive care from an adult they have a relationship with
- Educators holding higher qualifications enable higher quality care, education and relationships to happen in services
- Babies in lower quality education and care have higher cortisol rates brought on by stress.
- Whenever children are cared for they are learning from the adult providing the care.
- Across the childcare sector it is those educators with the highest qualifications that remain longest in their position, whilst those who are least qualified have the highest turnover rates.

It is likely that

- Reducing the qualifications of carers will encourage the provision of low quality services with large numbers of children.
- Babies, who require long term responsive relationships with their educators will be subject to high volume staff turnover.

**We believe that babies need very high care, quality and individual time with their carer, and not providing this level of care could lead to long term negative consequences for children.**

- **Number of University trained teachers in centres reduced.** (Current requirements are based on the total number of children within the service. The recommendation is to remove the nursery and toddler children from the count and include only preschool children.

Applied to Treehouse this would mean that we would only require one university trained teacher rather than the 2 we currently have employed.

In effect, with removal of requirements for Diploma trained educators and the reduced number of university trained educators Treehouse could potentially be staffed by one teacher and 11 Cert 3 trained educators.

We support KU position who strongly believes in the importance of high quality early childhood education, a major determinate of quality being the employment of qualified educators.

- **All governments should allow services to temporarily operate with staffing levels below the required ratios, such as by maintaining staffing levels on average (over a day or week) rather than at all times.**

We need required ratios AT ALL TIME. Increasing affordability by reducing the number of staff shouldn't be a solution explored.

- **NSW government should allow 3 month probation hiring period in which unqualified staff may be included in the staff ratios before beginning a qualification. (This has already been adopted in some jurisdictions).**

Only if there is enough trained and qualified staff (Diploma) at all time managing the team.

- **Exclusion of preschools from the National Quality Framework**

We support KU position: KU opposes the removal of dedicated preschools from the scope of the NAF. This encourages a division between "childcare" and "education". The inclusion of all funded service types in a single national framework is essential to ensure equality and consistency for all Australian children.

- **NSW services currently exempt from complying with standard 3.3.1 of the Australian Food Safety Standards. This exemption should be applied to all states and territories.**

We believe all childcare and schools in Australia should comply with Food and Safety Standards. It will also be consistent with policies preventing obesity.

## Accessibility

---

- **Approved Nannies to become an eligible service for which families could receive ECEC assistance. The Nanny must meet NQF standards.**

We support KU position: KU supports the recommendation believing that families, especially those who work outside the Monday – Friday nine to five working week require flexibility to access quality childcare.

- **The Commission recommends the inclusion of children with additional needs including vulnerable children in early childhood learning services. It notes there needs to be an increase in resources allocated to Inclusion and professional support programs. It notes the funding needs to meet the actual costs incurred by the ECEC service in including the children.**

We support KU position: KU is glad the Commission makes these recommendations. KU notes however that:

- inclusion is not just about being able to enroll your child in the service. The child must be enabled to participate in the educational programs. This requires professional support programs.
- there is concern in regard to the possibility of promotion of 'specialist disability ECEC services rather than the inclusion of children in mainstream services.

Additionally with respect to the provision of services to “vulnerable” children:

- provision of services to “vulnerable” children should not be at the added expense of all other children and families.

Whether there are other models of care, particularly international models, that should be considered for trial or implementation in Australia

---

Australia considers that early childhood services belong to the private responsibility of the parents when it should be considered as a public responsibility, like schools.

If Australia is sincerely looking at increasing women’s productivity in the workforce, we believe it should consider his role to provide quality subsidized childcare for all Australian families.

The sustainability and appropriateness of funding arrangements

---

- **Funding and the proposed Early Learning Subsidy**

KU position: KU supports the recommendation that funding and subsidies be:

- Streamlined into a single Early Care and Learning subsidy. This is much simpler for families and providers.
- Paid directly to providers, as it improves efficiencies, reduces bad debt and make actual cost more transparent to families.

- **Removal of tax exemptions for not for Profit providers.**

We support KU position: KU relies heavily on the tax exemptions available to the not for profit sector eg Payroll and Fringe benefit tax. This assists in remaining viable, reinvesting in our services, and in attracting and retaining quality educators.

Education shouldn’t belong to private groups and we support not for profit and public system. We strongly believe non for profit centres should be supported more not less with our taxes. Education doesn’t require to be competitive but safe and of quality.

Community Childcare Says:

- The Commission found that almost 50% of CCB approved services are operated by not-for profit providers.
- *The Commission found that not for profit providers delivered higher quality education and care (as evidenced by the assessment and ratings results)*
- Not for profit services provide more education and care for children with additional needs
- For profit services need to make a profit – this works against quality provision.
- Quality costs.