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Inquiry into Child Care and Early Childhood Learning

Samaritans administers the Supporting Children with Additional Needs (SCAN) Project on behalf of the Department of Education and Communities across the Central Coast, Lake Macquarie, and Newcastle, Lower Hunter, Upper Hunter and Mid-North Coast regions. Samaritans SCAN Project funds the inclusion of children with disabilities in community-based not-for-profit Preschool services across the fore mentioned region.

Samaritans Scan Project supports the Productivity Commission recommendation that the National Quality Framework for Early Childhood Education and Care services must be retained. The National Quality Standards within the National Quality Framework requires services to undertake reflective practises as part of implementing quality care and we recognise that the Productivity Commission has undertaken a reflective review of the National Quality Framework prior to making its recommendations.

The National Quality Framework

Samaritans Scan Project would like further clarification from the productivity Commission on **“what constitutes a dedicated Preschool?”**

Within the region covered by Samaritans SCAN Project there are differing models of Preschool services. Does the Productivity Commission mean Preschool services, operating between 9am and 3pm, when it refers to “dedicated Preschools?”

If dedicated Preschools are removed from the National Quality Framework, will the Productivity Commission be recommending state and territory Governments develop Quality Standards and implement these in “dedicated Preschools”? In New South Wales for example, the relevant state legislation has no mechanism for ensuring Quality Care and Education. Families who choose to utilise Preschool services will have no guarantee of quality Early Childhood Education and Care for their children.

The National Quality Framework in its current model unifies the goal for quality Early Childhood Education and Care services across the Early Childhood Education and Care sector. The current model of the National Quality Framework supports the goal for quality by providing a standard and ratings mechanism and already has the commitment of every Early Childhood Education and Care services, whether it is Preschool, Long Day Care or Family Day Care.

Remembering that the Framework was developed to include a:

- National Legislative Framework to create a uniform national approach to the regulation and quality assessment of Early Childhood Education and Care in Australia, and
- National Quality Standard that sets a national benchmark for the quality of Early Childhood Education and Care.

A move away from a National Commitment, where state and territory Governments are responsible for “dedicated Preschools” within their jurisdictions will create inconsistencies in the frameworks that services operate under and inconsistencies in the quality of services being provided. This will provide an inconsistency in service delivery and varying quality to Preschool education, also, where traditional Long Day Care services provide a Preschool program for children in their year before school, as is required under Universal Access. This move will further fragment the Early Years sector.

‘This would be a backward step in nationalising early childhood education and care. Preschools and Long Day Care are beginning to unite under the National Quality Framework with one standard for both. Both types of settings are capable of delivering quality early childhood education and care and families should be able to choose either setting knowing their child receives quality education and care. Moving preschools into the education system will jeopardise the play and interest based emergent curriculum currently implemented in most early childhood settings and push for a more school like curriculum for which younger children are developmentally not ready for’, Trish Thorncroft and Sabine Benz, Possums’ Den Preschool.

'Removing preschools from the framework is likely to intensify the divide between care and education and see one being advantaged at the expense of the other. Rather, we believe that children and families will gain greater benefit from quality environments that do not create a false divide between education and care. Education and care do not occur separately in quality education and care settings', Valla Preschool.

Samaritans SCAN Project does not agree with the Productivity Commission recommendations that requirements for Educators in centre-based services should be amended by governments such that:

- all Educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent
- The number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.

Samaritans recognises the professionalism, skills and experience of Educators holding certificate III qualifications and notes that Educators holding Diploma qualifications undertake additional training (compared to certificate III training) in program development and implementation. In the interests of providing Quality Care and Education, Samaritans would recommend that current National Quality Framework requirements for a Diploma trained Educator to lead educational programs provided for children aged 0 to 36 months.

'All children deserve qualified educators regardless of their age. This is especially important for children under 3 years of age as research indicates that brain development at this age affects outcomes for their future wellbeing. Although Certificate III in ECEC is a minimal qualification, it does not equip educators to deliver high quality care without the leadership and guidance of an experienced teacher working alongside them', Kylee Ball, Taree and District Preschool.

Similarly Samaritans supports the current National Quality Framework requirements for determining the need for an early childhood teacher in a service which is currently based upon the total number of children being provided care and education in a service daily. As opposed to the Productivity Commission recommendation for this to be reduced to only the number of 3-5 year old children in the service. Early Childhood trained Educators often undertake the role of Educational Leader, guiding the development, implementation and evaluation of educational programs across the service. If access to an early childhood teacher is based solely on the ages of the children small services offering care and education to children aged 0-3 only will have no access to an early

childhood teacher to further build the capacity of the Diploma and Certificate III trained Educators to provide quality programs.

Samaritans agrees with the Productivity Commission recommendation that current inconsistencies between states and territories in staff ratios and qualification requirements should be resolved, with all jurisdictions adopting the national requirements as minimum standards. We believe the current qualifications requirements outlined in the National Quality Framework should be maintained as the minimum standards.

Assistance for universal preschool access

Samaritans SCAN Project supports the productivity Commission recommendation that Governments should maintain Preschool program funding as a priority area. Government funding for Preschool (on a per child basis) should ensure universal access for children to 15 hours per week of a Preschool program for 40 weeks, in the year prior to starting school.

The response from services who are clients of the Samaritans Scan Project is that Preschools in New South Wales operate for 41 weeks per year and would like to see the funding reflect the operational hours of the services as a minimum (recognising that Preschool programs in Long Day Care service operate a minimum of 48 weeks per year).

Under the Commission's recommendations, the Australian Government would provide the same level of assistance for Preschool to every child, regardless of whether they participated in a dedicated Preschool or a Preschool program in a long day care centre. Samaritans Scan Project would encourage the Federal Government to consult with and recommend strongly to the NSW Government greater investment in Early Childhood Education and Care to ensure greater access for children in their year before school in New South Wales, to reflect models in place in other states such as Queensland.

Subsidies

Samaritans Scan Project supports one single means tested subsidy such as the proposed Early Care and Learning Subsidy, and is excited that this money will be paid directly to service providers to be passed on transparently as a discount in fees charged. We would further expand on the proposed Early Care and Learning Subsidy access requirement recommendations to be available for all centre-based Early Childhood Education and Care services adding Preschools to the list.

All families accessing Early Childhood Education and Care services satisfying the appropriate National Quality Standards should be able to access the Early Care and Learning Subsidy and should not be penalised because their decision to enrol their child in a Preschool program in a Preschool service rather than a Preschool program in a Long Day Care service.

At risk children

Samaritans Scan Project supports the Productivity Commission recommendation that children assessed as 'at risk' have access to an Early Childhood Education and Care services. Recognising the limited availability of Early Childhood Education and Care placements, it is feasible to assume that some of these children will be accessing a Preschool program in a dedicated Preschool. Therefore supports to services, such as

- 100 per cent subsidy for the deemed cost of Early Childhood Education and Care services, including an additional costs funded form the Special Early care and Learning Subsidy program, and
- Up to 100 hours a fortnight, and
- Support for initially 13 weeks, then after assessment, up to 26 weeks, should be available to dedicated Preschool services as well.

Samaritans Scan Project would like clarification form the Productivity Commission, on what is the Special early care and Learning Subsidy. Is this different to the Early Care and Learning subsidy and if so, in what ways is this subsidy different and who qualifies for this Special Early Care and Learning Subsidy.

Children with Additional needs

Samaritans Scan Project supports the Commission's recommendation to create two block funded programs replacing the many varied programs currently being funded.

The first block funded program- the Disadvantaged Communities Program- would block fund providers, in full or in part, to deliver services to concentrations of children in highly disadvantaged communities. The Productivity Commission needs to further clarify which providers would be able to access this funding. Samaritans Scan Project would point out that families in highly disadvantaged communities do not only access Long Day Care services, they also access dedicated Preschool services in their communities. Therefore this funding should be available to all Early Childhood Education and Care services.

The Productivity Commission recommendations further identify that children with additional needs would have access to a 'top-up' subsidy to meet additional reasonable costs to services. That this funding would allow services to access assistance to capacity build to facilitate full integration of Early Childhood Education and Care services with schools and other services. Again, Samaritans Scan Project would ask the Productivity Commission to clarify which service can access this funding pool, as a fully inclusive program should be available to all children, including children in "dedicated Preschool' programs as service Educators in "dedicated Preschools' also need capacity building support to ensure fully inclusive programs are provided to all children and their families.

Viability Assistance

Samaritans Scan Project supports the recommendation of the Productivity Commission to establish viability assistance programs to assist Early Childhood Education and Care service providers in rural regional and remote areas to continue to operate.

Other recommended Changes

Samaritans Scan Project would encourage the Productivity Commission review the recommendation to remove fringe benefits tax concessions to not-for-profit Early Childhood Education and Care services, as these services by their very nature operate without profit and therefore have no competitive advantage over commercial services.

Other feedback

Samaritans Scan Project would like to remind the Productivity commission and the Federal Government that:

- The Early Childhood Education and Care industry is renowned for its acceptance of change and that in recent years there have been many significant changes including new curriculum, new regulations, National Quality Standards and in New South Wales an new funding model and, soon a new funding model for children with disabilities.
- All change which involves compliance and funding, involves training of Educators in the service internally and externally. The fore mentioned changes come at a large financial cost to Early Childhood Education and Care services, which can be a burden to not-for-profit organisations.

- Early Childhood Education and Care remains a stressful profession, and Educators working in this sector already dedicate large amounts of time and energy to understand and implement all operational systems and funding models. Early Childhood Education and Care services will be required to add to these pressures with any new changes proposed by the Productivity Commission recommendations that the Government decides to implement.

'Changes involving new regulatory bodies / standards etc., involve training of all educators in a service, internally and externally. This comes at a large financial cost which is a burden to non-profit organisations', Singleton Heights Preschool.

Samaritans Scan Project would ask the Productivity Commission to clarify if any changes will be sustained or transitional? Will any future variations in Government result in further changes?

As a provider of services to children and families and promoters of inclusion for all in the community, Samaritans Scan Project supports a nationally consistent system for all children, families and Educators throughout Australia.