

To the Commissioner,

I am the Director of a 25 place non-profit community-managed Preschool near Lismore on the North Coast of NSW.

I reject a great number of the recommendations in the draft report as they are made on the basis of prioritising economic productivity over children's education, development and wellbeing. This is concerning, especially given the wealth of research about the long-term social and economic benefits of quality early childhood education and strong links between expenditure on ECE and outcomes in later life.

In terms of my current role at Clunes Community Preschool, I am particularly concerned about the following:

The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program (Draft recommendation 7.9)

I believe that the National Partnership Agreement to provide Universal Access should continue, not only in the short term, but as a more permanent arrangement between the Commonwealth and the States. I agree that this funding should provide preschool for children in the *two* years before school, with priority given to children who are in the year before school. National and international research supports this.

I believe that *a minimum of* 18 hours per week is the optimal hours of attendance at preschool to ensure children's learning and development. While there is little available research to determine optimal hours, my own observations over 25 years of working with young children supports this. **(Information request 5.1: What are the optimal hours of attendance at preschool to ensure children's development and what is the basis for this?)**

Re draft recommendation 7.9: Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation.

While preschools are generally achieving higher assessment ratings than their counterparts in other service types, preschools still require some mechanism for creating, assessing and maintaining quality learning environments. It is difficult to comment on the removal of preschools from the NQF without knowing what system will replace the current one and I believe more information is required regarding this recommendation.

Re: The introduction of the ECLS. While preschools have been required to comply with the National Law, the National Quality Standards and the implementation of the Early Years Learning Framework, our working families have only been able to access a minimal amount of CCR. I believe that all working families, regardless of which type of education and care service they choose, should be eligible for the new ECLS or any other rebate scheme designed to offset the cost of care for working parents. Exclusion of preschools from this subsidy means that parents do not have an equal choice about which type of education and care provider they use.

I am also concerned about:

- the reduction of standards around staff to child ratios and around the qualifications of teachers and other educators. As a director, I do not see good

ratios and highly qualified staff as 'regulatory burden' but rather, essential to the provision of high quality education and care for young children.

- the involvement of preschool-aged children in OOSH care. While this could be a positive, it is essential that standards and ratios required in other services for children under school age are maintained. Young children require higher ratios and greater support from adults than school-aged children do and I would be concerned for the wellbeing of a pre-schooler in OOSH under the current ratios.

Thank you for the opportunity to comment.

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