

4 September 2014

Productivity Commission  
Childcare and Early Childhood Learning  
Productivity Commission  
GPO Box 1428  
Canberra ACT 2601

By Email: childcare@pc.gov.au

Dear Sir/Madam

**Submission: Draft Productivity Commission Inquiry into Childcare and Early Childhood Learning**

We are the Committee of Management of Elwood Children's Centre (CoM of ECC), a not-for-profit community based childcare centre in Elwood, Victoria. We have reviewed the relevant sections of the draft Productivity Commission Inquiry into Childcare and Early Learning and have a number of concerns with some of the recommendations.

While we support some of the initiatives, including the continuation of Commonwealth funding for Universal Access to preschool for children the year before school, there are a number of recommendations that we believe will undermine the quality of care and education being offered to our children.

The Elwood Children's Centre is a high quality childcare and kindergarten program that has highly qualified staff and a stimulating and rich program across all ages. The Centre attracts educators that are passionate about children and early childhood learning and as such, typically remain employed at the centre for long periods, providing a high continuity of care for children and ongoing relationships for families. It is a community facility that families form a special connection with; older children have fond memories of; and current families have confidence in the quality of care.

We are concerned that several proposals in the draft report will reduce the quality of education and care, with consequential impacts on our children during their early years which, overwhelming research has shown to be, one of the most critical development stages of life.

- Reducing the qualification requirements for educators for under 3 years to Certificate III. This proposal provides a disincentive for more highly qualified staff to work with the younger age group and would seem to devalue the role of an educator with this age group. This has serious implications for higher turnover of staff; less continuity of care; and less experienced educators caring for our youngest children, who often need it the most. Our current youngest room is run by an educator with a Diploma of Childrens Services qualification

and 15 years' experience. Her education, experience and skill with these under 3 year olds is evident in the happiness of the children, and is instrumental in parents feeling confident to return to work. The high standard of the program in this room was particularly noted in our recent NQS assessment where we received an overall rating of exceeding the National Quality Standards.

- Allowing services to operate with staffing levels below ratios, by maintaining staffing levels on average (over a day or week) rather than at all times. Staffing ratios are a key aspect of quality childcare, with obvious benefits for children and educators alike. Reducing them to 'averages' across a day or week is very concerning
- Removing the cap on numbers of children. Being a very small centre with limited internal and external space we would be concerned about being under pressure to increase the number of children in the centre on any given day.
- As a small not-for-profit community based childcare we are concerned about the removal of our current exemption on payroll tax. This would negatively impact us financially as and most definitely lead to a further fee increase for families.
- Inconsistencies between States and territories in staff ratios and qualification requirements to be resolved through adopting national standards. While we support this measure if it seeks to improve those States and territories with lower standards, however would strongly object to any lowering of the current Victorian standards.

Overall, parents of our community are very aware of which childcare centres and preschools offer high quality care and education, and those that don't. The quality provides a direct impact on the healthy growth of our children and also on the confidence of parents to return to work. Any new measures proposed should be to support our childcare educators, and to provide the highest quality care for our children.

Yours sincerely

Elwood Children's Centre  
Committee of Management