

Submission

Productivity Commission – Response to the Draft Report into Child Care and Early Childhood Learning

Submitted on behalf of Explore and Develop Wamberal

Written by Cheryl Bruce – Owner Operator – Approved Provider

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We appreciate the opportunity to be a participant in the process of the hearings and the opportunity to voice our views on the issues which have been raised by the Productivity Commissions Draft Report.

As an Owner Operator of a long day care service I am actively involved in my business and all aspects of ensuring quality of care for the children and families who use our service, and also a safe and equitable working environment for our educators and employees. There are several points of concern raised by the draft report.

With relation to points raised in the report around Assessment and Rating process, as part of a franchise of 22 services across the greater Sydney region and Central Coast we see a great variety of interpretation of the National Quality Framework. While this process is conducted by individuals who naturally have their own opinion, values and belief systems, I understand this is difficult to streamline. Many times since the implementation of the NQF we have adjusted our notification forms such as medication, accident & injury and excursion documents to meet the opinion of an assessor visiting another Explore & Develop site. What would assist this process and reduce administrative burden would be for DEC or ACECQA to publish a version of these forms for services to utilize without any doubt that documentation requirements are being met.

Personal beliefs of assessors seem to be affecting many services ratings, as you hear judgments made about things like progressive lunches, routines, portfolios, and sustainability – all of which vary greatly in practice from service to service to meet the needs of their community. We often hear of situations where an assessor may give a service the opportunity to ‘run out and buy’ something, or quickly change a policy or put a certain sign up in order to achieve a better rating, and other services who have no opportunity to make changes and are marked on the practices seen on the day and the centre environment as it is.

The system of one element out of 58 not being met, and a service gets a rating of 'working towards' is totally unfair. No other system in my 42 years life experience is a failure for one wrong answer. And the result of 'working towards' or even 'meeting' certainly feels like a failure to services and educators who are passionate about what they do.

I have heard suggestion of a scale/chart similar to the QIAS system with the results for each standard, but not an overall rating. This gives families a much more accurate overview of areas a centre needs to work on, without the judgement that comes from seeing an overall rating that might have been brought down by only one or two elements, some of which are not important at all to parents in the decision of which service to send their child to.

I am greatly concerned about the effect of staff shortages in our sector already experienced to meet the higher NSW regulation relating to Bachelor qualified Early Childhood Teachers. I would welcome this saving provision for NSW to be removed from the regulations and matched to other states. I don't see this as a reduction in quality as many services are unable to meet this regulation at present.

One way to encourage Early Childhood Teachers to study and remain in our sector would be to offer a funded degree to Diploma qualified educators already working in the sector. If this degree was just the early childhood component rather than Birth to 8yrs, our passionate educators would not be leaving the sector so quickly for primary school positions. Pay parity would also assist educators remain in our sector, but is obviously a difficult one to resolve without govt funding to ensure childcare fees don't become out of reach for families.

Experience is also not to be ignored and educators can perform better in the workplace if they are committed to professional development. We would like to suggest to the Commission that a requirement for professional development (PD) be part of this consideration. Many other sectors approach this by requiring a minimum number of hours per year of professional development be completed to remain current within their profession. I could see this as proactive way to keep Educators in the Sector current and informed.

Another factor that will add to the shortage of educators in our sector is the consideration of funding for nannies and grandparents. Everything considered, the incentive to work 1:1 with a child for a higher salary than a service operator can afford will see qualified staff moving to these

roles. If parents receive CCR then this is a likely outcome. Asking nannies to comply with the NQF if funding is being paid is humanly impossible. The development of systems, delivery of documentation required would be very difficult and would take away from the time with the child so it all seems counter-productive. If this was to be approved, I would like to suggest a similar format to Family Day Care where educators need to be registered with overseeing organisations to ensure quality is regulated and observed.

I am also concerned about how DEC would cope with the added burden of A&R and compliance visits with an already stressed system.

Another consideration could be that CCR could be made available to families who can prove they are working in a non-traditional environment that requires care for their children outside of the operating hours of most services such as shift workers. This is an area where families need support and the traditional models of LDC's are costly with overtime rates for staff etc

In relation to qualified staff being averaged over the week, I believe some better clarity needs to be offered around this recommendation. There appears to be a number of interpretations of this point so perhaps it needs to be more prescriptive such as "an ECT be available daily for a minimum of 6 hours 3 times a week" or whatever the interpretation is would add some clarity. I do believe some flexibility in understanding the difficulties of rostering staff at beginning and end of day would be positive, as parents have the ability to arrive and leave the centre at any time during open to close hours this would ease the stress on services. Whilst we work on our experience of families normal routines, it is sometimes unpredictable.

Via my local member Lucy Wicks I was advised about a foreign language program trial for 2015 – (ELLA). This trial talks about \$9.8million being spent on a trial in only 40 services across Australia for preschool aged children. Even if learning languages improves outcomes for children later in life, at a time where the Government is talking about winding back quality reforms to make childcare more affordable for families, I can't see the value in this expenditure across such a small number of children. How much will the program cost to be implemented across all preschools in Australia?

It would be disappointing to see 'preschools' be removed from the NQF as suggested in the Draft Report. On an operating basis LDC can and

many do offer the same curriculum for preschool aged children just in an extended hours setting for working families. As such, we see no logic in treating these structures differently other than allowing preschools to work outside of a compliant environment and to confuse parents. There have been significant improvements in consistency of program delivery as a result of the changes for preschool joining the NQF processes and it would be disappointing to see this be reverted so soon.

Thank you for the opportunity to give feedback on the Commissions Draft Report

Yours faithfully

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