

## **ABOUT US**

Sutherland Shire Council Children's Services (SSCCS) currently operates a range of services, which include

- 11 Early Education Centres
- 1 Before and After School Care Centre
- 4 Vacation Sites
- 25 Current Family Day Care Educators

SSCCS also operates as a Registered Training Organisation and delivers:

- Certificate III in Early Education and Care, Diploma in Early Education and Care, and Cert IV in School Age Care, Diploma in School Age Care, accredited courses.
- A non-accredited training program undertaking both scheduled courses related to Early and School aged Education and Care and also providing customised training to interested parties.
- Parent training including partnerships with local community health and project youth and other family services to assist with building the capacity of families within the Sutherland Shire and surrounds.

SSCCS is supported by a:

- Central administration team for management of waitlists, fees and enquiries.
- A multi-tiered management team located with the administration team at central office.

## **INTRODUCTION**

Sutherland Shire Council Children's Services has a mixed response to the Productivity Commission Draft Report on Childcare and Early Childhood learning. There are some areas of agreement and areas of concerns, which is further detailed below.

### **Areas of agreement**

Sutherland Shire Council would firstly like to draw your attention to a number of recognised positives contained within the Draft Productivity Commission report. Sutherland Shire Council Children's Services, welcome the following (not listed in any order of priority);

- 12.4 Combination of the CCR,CCR,JETS into the ECLS and being paid to the centre, the funding of which coming from the Aust Government
- 7.3 Continuation of the National Quality Framework, and the inclusion of out of scope services.
- 12.9 Universal Access continuing and being extended to LDC in jurisdictions where this funding is currently not being passed on.
- 5.2 The inclusion of an Integrated model.
- 12.6 The possibility of the three programs for inclusion and access of children with additional needs.
- 7.4 Inclusion of a ratio and qualification requirements for School Aged Education and Care Services.
- 7.1 The possibility of tailoring the NQS further to meet service types.

- 8.2 Recommendations that all schools take responsibility for organising the provision of an outside school hours care service for their students where demand is sufficiently large.

### Areas of concern/disagreement

Sutherland Shire Council would like to draw your attention to a number of concerning areas contained within the Draft Productivity Commission report. Sutherland Shire Council Children's Services, are concerned about the following in particular (again, not listed in any order of priority).

- 7.9 Preschools excluded from NQF, to be the responsibility of schools and receive school funding and use the school curriculum.
- 7.2 Reduced staff qualification requirements for children under 3 years, including the statement by the Commission that there is no research that shows children aged under 3 benefit by having educators with qualifications beyond a Certificate III
- 10.1 Removal of tax exemption for NFPs for payroll and fringe benefit tax.
- 12.4 Whilst the simplification of rolling CCB/CCR and JET funding into one and being paid directly to the service is positive concerns regarding the cost model to benchmark "deemed cost of care"
- 12.7 Vulnerable families unable meet the 'activity' test and children with additional needs
- 8.5 Concerns regarding nannies becoming eligible services for families to receive ECEC assistance. Burdening an already over stretched workforce to implement NQS for nannies and possible detrimental effect on utilisation of existing services, particularly FDC.
- 8.1 Removal of requirement that most children attending OOSH services to be of school age.
- 7.3 The adoption the national staff qualifications which will result in lowering the ECT requirement for NSW children.
- 7.5 Services being able to meet "average" staffing and qualification requirements rather than meeting this at all times.

Sutherland Shire Council Children's Services will further focus on areas that will directly impact their services and the parents and children enrolled within:

1. **Reduced staff qualification requirements for children under 3 years, including the statement by the Commission that there is no research that shows children aged under 3 benefit by having educators with qualifications beyond a Cert III**

Child development specialists have produced decades of research showing that the environment of a child's earliest years can have effects that last a lifetime. Thanks to recent advances in technology, we have a clearer understanding of how these effects are related to early brain development. Neuroscientists can now identify patterns in brain activity that appear to be associated with some types of negative early experiences<sup>1</sup>

<sup>1</sup> Urban Child Institute Baby's Brain Begins Now: Conception to Age 3

NSW has a history of requiring more than a minimum of Certificate III for our most vulnerable children. The 2004 Regulations stated that a Diploma trained educator must be available at all times when children aged under three years were in attendance at the centre, prior to this, there was a requirement that a mothercraft nurse be employed at centres that enrolled children under 3 years of age. The additional requirements were due to the brain research and long held knowledge surrounding the specific education and care requirements for this age.

Certificate III qualifications, whilst important, cover only basic information in regards to care for children and do not delve deeper into child development and brain research. Diploma qualifications are the first qualification level under Education and Care that have an in-depth look at development and how to identify, support and when to refer to specialist services. The concern only having certificate III educators with our babies, (a) they are ill equipped to deal with meeting all children's needs (b) children who require additional support and early intervention may go unnoticed which will affect their chances of future life success (c) the knowledge regarding brain research for this age group may result in improper and poor quality care.

Looking further at brain research and specifically the effect of cortisol on brain development, it provides more support for highly qualified educators with under three year olds. Cortisol is a chemical that is secreted in the brain in order to bring the brain back to a stable level after the body has experienced stressful situations. Stressful situations in an infant's world include lack of attachment and bonding with care-givers, lack of consistency in relationships and positive, unhurried interactions. Positive attachment roles through peaceful relationships and interactions with caregivers assist in the development of empathy, feelings of security, the building of resilience, ability to adapt to changing circumstance, developing a conscience, developing trusting relationships, developing self regulation (managing impulsive behaviour) and dealing with stress.

Repeatedly high levels of Cortisol present in an infant's brain due to stressful situations and the possible irreparable brain damage mean that an infant will not develop a functional reference framework that provides a myriad of emotional responses appropriate to various interactions. This includes (or rather does not include) a template for peaceful responses to situations involving conflict. As educators, we need to ensure that we are providing high quality, peaceful and positive relationships, experiences and interactions with children from the moment of birth. By providing these experiences, we are providing optimal circumstances to promote healthy brain growth and function so that our children can become well rounded people with a healthy emotional intelligence.

'Virtually every aspect of early human development, from the brain's evolving circuitry to the child's capacity for empathy, is effected by the environments and experiences beginning early in the prenatal period and extending throughout the early childhood years'<sup>2</sup>

There should be no separation of Education and Care with our under three year olds. The Early Years Learning Framework (EYLF), which is the mandatory learning framework for use in all Education and Care services regardless of type, ownership, quality or status, states the following;

"The Council of Australian Governments has developed this Framework to assist educators to provide young children with opportunities to maximise their potential and develop a foundation for future success in learning. In this way, the Early Years Learning Framework (the Framework) will contribute to realising the Council of Australian Governments' vision that:

*"All children have the best start in life to create a better future for themselves and for the nation."*

The Framework draws on conclusive international evidence that early childhood is a vital period in children's learning and development....The Framework forms the foundation for ensuring that children in all early childhood education and care settings experience quality teaching and learning. Early childhood educators guided by the Framework will reinforce in their daily practice the principles laid out in the United Nations Convention on the Rights of the Child (the Convention). The Convention states that all children have the right to an education that lays a foundation for the rest of their lives, maximises their ability, and respects their family, cultural and other identities and languages"<sup>3</sup>

There is no separation in the EYLF or the National Quality Standard (NQS) in regards to programming and educational requirements for our under and over three year olds.

## **2. Whilst the simplification of rolling CCB/CCR and JET funding into one and being paid directly to the service is positive concerns regarding the cost model to benchmark "deemed cost of care"**

For our services and presumably for NSW education and care services as a whole (where the qualification requirements are higher in regards to ECT's) the current model and calculation of deemed cost of care is highly concerning.

According to the draft productivity commission report, the deemed cost of care per hour is as follows (LDC-\$7.53p/hour FDC-\$6.84p/hour OSHC-\$6.37p/hour). Within NSW where the average cost of care is over \$90 per child per day, even parents receiving the maximum subsidy will be dramatically out of pocket due to the child care fees being significantly over your deemed cost.

If deemed cost of care is introduced we propose the following (a) that the deemed cost for Early Education Centres is per day rather than per hour, (FDC is often modelled on hourly rate so deemed cost per hour would be relevant for this) and (b) state and territory current average cost of care and additional qualification

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<sup>2</sup> Ritchie, J, Lockie, C & Rau C 2011, 'He Tatu Pounamu. Considerations for an early childhood peace curriculum focusing on criticality, indigeneity and an ethic of care, in Aotearoa New Zealand', *Journal of Peace Education*, vol.8, no.3, pp.333-352, DOI 10.1080/17400201.2011.621367.

<sup>3</sup> Department of Education, Employment and Workplace Relations and Council of Australian Governments. (2009). *Belonging, Being and Becoming: The Early Years Learning Framework for Australia*.

requirements be taken into account and there be flexibility or differing rates depending on this.

### **3. Vulnerable families unable to meet the 'activity' test.**

Research identifies the following as high risk of post natal depression and child maltreatment<sup>4</sup>: Social isolation, low socioeconomic factors, young families, history of violence. Parents who are unable to meet the activity test of 24 hours per fortnight are likely to fall into this category, the exiting of these high risk families from the eligibility of the ECLS and in turn their position in Early Education raises their isolation and the children's risk.

Without these children and families sourcing high quality Education and Care services with Early educators that are trained in development and identifying children at risk, how do we attempt to break the cycle of poverty and maltreatment. Research shows that early intervention and education is vital in breaking poverty, education and isolation cycles, particularly in children at risk of maltreatment<sup>5</sup>.

### **4. Nannies becoming eligible services for families to receive ECEC assistance. Burdening an already over stretched workforce to implement NQS in nannies and possible detrimental effect on utilising of existing services, particularly FDC.**

The current NQF system is overburdened with a large majority of services still not being assessed<sup>6</sup>. The possible influx of other services through nanny registration across Australia would result in a much higher rate of unassessed and possibly poor quality services operating to care for children.

There are further concerns regarding the complexities of assessing and rating nannies located within parents homes. Family Day Care have selected areas of their residence that are risk assessed prior to providing care, this ensures that all areas accessed by children are safe and meet regulatory requirements. When nannies are entering different parents homes to provide care for children there are the following complexities;

- (i) How will the nanny restrict access to children in their own home to areas that have been risk assessed and meet regulatory and safety guidelines?
- (ii) Who will undertake the risk assessments prior to nanny commencing in each home and how with this be undertaken?
- (iii) With the care being provided within the parents home, how will the nannies be able to have control over equipment, maintenance and other matters to provide a child safe environment and meet regulatory requirements?

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<sup>4</sup> Sources: Brown, Cohen, Johnson, & Salzinger (1998); Stith et al. (2009); US Department of Health and Human Services (2011).

<sup>5</sup> Campbell, F. & Ramey, C. (2008). *Effects of Early Intervention on Intellectual and Academic Achievement*.

<sup>6</sup> ACECQA 2014, *NQF Snapshot Q1 2014*

If the proposal of nannies becoming eligible services and thus parents receiving ECLS for the use of this service is implemented, Sutherland Shire Council Children's Services urge the productivity commission to also propose and support the following:

- (a) Requirement for nannies to register to a support unit to be monitored and supported - utilising the Family Day Care Coordination Unit model.
- (b) Increase in free training and support available for nannies to ensure their understanding of regulatory requirements.
- (c) Increase in workforce resources under the regulatory bodies across Australia to increase the ability to attend services for assessment and ratings.
- (d) Increase in training for Assessment and Compliance officers in all regions in regards to the education and care provided by nannies and how to assess these service types.
- (e) Rather than remove the in-home care model, consideration of extending this to include nannies.

**5. The removal of requirement that most children attending OOSH services to be of school age.**

Ratios for our under 5 year old children are based on the research and requirements for this age group. By removing the school age requirement for children being enrolled in and attending school aged education and care the following concerns are raised by Sutherland Shire Council Children's Services;

- (i) Children of young ages (under five) being in an unregulated space in relation to qualification and ratios. Services must be required to meet the qualification and ratio requirements for the youngest age as per centre based regulations.
- (ii) Educators working within School Aged Care not undertaking training based on development and social / emotional requirements for the under five year old ages.
- (iii) Young children (of 3-5 age group and possibly below) being placed in group care with children of up to 12 years of age accessing Before and After School and Vacation Care. The developmental gap and possible negative effects on children with this vulnerability is a high concern.

**6. Adoption of the national staff qualifications which will result in lowering the ECT requirement for our children.**

Research states that teachers with bachelor degrees, specifically in early education provide a higher quality of learning experiences for children <sup>7</sup> Due to this, NSW has historically have held a higher requirement in regards to Early Childhood Teacher's within our Early Education and Care services. NSW regulations have always

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<sup>7</sup> Pianta, R., Howes, C., Burchinal, M., Bryant, D., Clifford, R., Early, D., & Barbarin, O. (2005). Features of Pre-Kindergarten Programs, classrooms and teachers: Do they predict observed classroom quality and child-teacher interactions.

demanding one university qualified early childhood teacher for around every 30 children from birth, regardless if the service is a LDC or a preschool.

NSW requirements are currently grandfathered within the Education and Care National Regulations. Sutherland Shire Council operates 11 Early Education Settings ranging from 40-59 enrolled places. Under the current grandfathered regulations our children have access to the following:

>40-<59 Children: Two early childhood teachers must be in attendance at all times that a centre - based service is educating or caring for 40-59 children preschool age or under.

Under the proposed adoption of national qualifications, the following would take place in Sutherland Shire Council Early Education Centres:

>25 <60 Children: Access to ECT for 6 hours per day, however services are not liable to meet this regulation if they employ the equivalent to a full time early childhood teacher.

Effectively under the productivity commission draft recommendation 7.5 by employing an ECT as a director position full time, our services would meet this regulation effectively closing out face to face access to an ECT for all 11 of our Long Day Care Sites, which equates to 2,199 enrolled positions across every week.

Sutherland Shire Council Children's Services hold grave concerns in reducing the ECT requirements for our Education and Care services and feel strongly that:

- (a) Certificate III and Diploma trained staff would lose access to the mentoring and support in programming and pedagogy from an ECT working with them.
- (b) Children will lose research proven higher quality education and learning experiences that may be either delivered directly by and Early Childhood Teacher OR by a diploma or certificate III educator under advice and guidance of an ECT.

Sutherland Shire Council recognises the strain in employing quality early childhood teachers within Early Education and Care, rather than removing this requirement and disadvantaging children enrolled in the Education and Care sector we suggest the following:

- (a) Removing the requirement under the regulations of two ECT's being present "At all times" as this requirement sees services with children attending longer hours struggling to fulfil this requirement. Rather, the requirement that two full time ECT's be employed within the services on a daily basis should be sufficient.
- (b) Providing further funding to Early Education and Care services to (i) provide a comparable pay for teachers in the school system and (ii) provide further relief from face to face and programming time to ECT's within the system for comparable work conditions with teachers within the school system.

7. **Services being able to meet 'average' staffing and qualification requirements rather than meeting these at all times.**

Sutherland Shire Council Children's Services hold grave concerns for services being able to meet qualification and staffing requirements 'on average' rather than meeting these during operational hours. Social equity is called into question on this recommendation.

There is concern that services may utilise this 'average' to operate out of ratio, simply by stating that they meet this on average and taking advantage of the loop hole in quality that this recommendation brings.