

Samaritans Early Learning Centre  
41 Darby Street  
NEWCASTLE NSW 2300

Wendy Craik and Mr Jonathon Coppel  
Childcare and Early Childhood Learning  
Productivity Commission  
GPO Box 1428  
CANBERRA ACT 2601

26<sup>th</sup> August 2014

Dear Ms Craik and Mr Coppel

Please find attached our submission in response to the Productivity Draft Report, addressing the following recommendations:

1. **Affordability**
2. **Reducing the level of training required for the zero – 36mths age group.**
3. **Removing Preschools from the National Quality Framework.**
4. **Non for Profit Sector. Extending the Scope of the National Quality Framework.**

In addition to providing information on each of the points above from the perspective of a not for profit ECEC, our submission outlines our ideas to improve on the current system.

As an organisation that works closely with families we can provide a valuable insight into, not only the needs of children but also the needs of parents and families.

**Introduction:**

Samaritans Foundation is a non-government organisation that supports some of the most vulnerable within our community. Our core values are compassion, integrity and justice. Our principle belief is that those who are disadvantaged have the right, equally with others, to be included and valued within the community. As well as Children's Services Samaritans provides disability, youth and community services including early intervention and out of home care.

Samaritans covers an area that extends from the Central Coast, to the mid north coast and west as far as Coonabaraban. We provide 100 services and employ approximately 650 employees.

Our Agency Ethos is to:

- develop workable pathways to achieve the agency vision

- promote and demonstrate human rights, inclusive practices, social justice and equal opportunity
- respond to contemporary social issues in innovative and creative ways, engaging with the wider community to reflect local priorities and aspirations
- are open to all people regardless of age, race, religion, culture, disability, sexual preference or political allegiance
- are encouraged to develop in co-operation with the local Anglican parish and other community groups
- are supported in working in existing partnerships with Aboriginal agencies, where appropriate
- support people to achieve their potential, to take control of their lives and to live with dignity and integrity
- ensure that service users have the opportunity to participate in decision affecting them and their families

Our Children’s Services portfolio includes the following programmes; Brighter futures Program; Family Day Care; Early Learning Centres; In Home Child Care; Out of Home Care; Samaritans Early Intervention Co-ordination Team; Supporting Children with Additional Needs; Kinship Care; Intensive Family Support

As an Organisation that supports the community we would like make the following comments in regards to the key recommendations from the recent Draft Productivity Report.

**Affordability:**

The Draft Report has recommended that there be a single child-based government funded subsidy – The Early Care and Learning Subsidy. This would replace the current family payment of Child Care Benefit and Child Care Rebate and the JETCCFA.

Our organisation would welcome changes to the current funding model but only if those changes did not impact negatively on the most vulnerable families.

All children deserve a right to an early childhood education. This is fundamental right of children. Under the UNICEF Bill of Rights Article 26 it states that “Every child has the right to an education that respects and develops their personality and abilities”. - <http://www.unicef.org.au/Discover/What-we-do/Convention-on-the-Rights-of-the-Child/Child-Rights.aspx#sthash.xOmSYniR.dpuf>

A good beginning to life bears dividends for development, health and wellbeing, both throughout childhood and across life (Keating & Hertzman, 1999),

The Early Childhood sector recognises the benefit of play based learning. Under the National Quality Framework all Early Childhood Education and Care (ECEC) services use the recommended Early Years Learning Framework as their curriculum, a play based framework which focuses on the strengths and interests of children. This holistic curriculum discusses the importance of play as “providing opportunity for children to learn as they discover, create, improvise and imagine. Children are

connected to social groups; they can test out ideas, challenge each other's thinking and build new understandings". (EYLF)

Streamlining the current funding model would benefit families but would need to be adjusted to assist the more vulnerable families within our community. At present the CCR is payable only to those families who meet the current work, study test. This is disadvantageous to the most vulnerable families i.e those who for whatever reason do not work or cannot work, women who are fleeing domestic violence, refugee families, CALD families and indigenous families.

If the recommendation is implemented these families may not be able to attend early childhood education and care facilities. In the event payment was means tested and activity tested, it is highly likely many families could not afford ECEC.

One may ask: Why do families need ECEC if they are not working?

This question can be answered not through the eyes of the parent but through the eyes of a child - should a child miss out on important learning because his/her parent does not work?

It would appear the focus is on the productivity to the current Australian economy and not looking at the long term benefits (productivity, learning, social) of the developing child. As a society the focus should be "what is best for the child".

It is well documented that the human brain develops most rapidly in the first 3 years of life. "The first three years of life are a period of incredible growth in all areas of a baby's development. A newborn's brain is about 25 percent of its approximate adult weight. But by age 3, it has grown dramatically by producing billions of cells and hundreds of trillions of connections, or synapses, between these cells." <http://www.zerotothree.org/child-development/brain-development/>

The importance of providing high quality programmes for children cannot be understated with this knowledge.

If the Australian Government is committed to establishing a sustainable future for all our children then all children have a right to quality ECEC.

Our organisation would support "free" ECEC for vulnerable families defined in the report as:

- low income families
- children with a disability
- children at risk of abuse or neglect
- children who are developmentally vulnerable.

For these families an Early Childhood Education and Care facility not only has improved outcomes for the child but is also able to support the family with parenting etc. and referral i.e. wrap around services.

As outlined in the Draft Report there are many variables in working out the 'benefit' each family receive (p. 736- 738). It is evident a more simplified approach is required

– perhaps by adjusting the payments to reflect the “real” fee structure within the ECEC.

Perhaps, by combining how the CCB and CCR payments are administered and formulated, and by adjusting the maximum hourly rate to reflect the actual hourly costs of running an ECEC, a more realistic cost would be reached.

We would advocate strongly that all ECEC increase their capacity to include children from vulnerable backgrounds to at least 5% of their daily capacity.

In so doing we would see a positive influence not only for the child but for their families who will be able to then access the services they require.

### **Reducing the Level of Training Required for the Zero to Three Age Group**

Prior to the introduction of the National Quality Framework in 2012 the child/staff ratios for under 2's was 1:5. After much deliberation and inquiry it was lowered to 1:4 as this provides for optimal learning, quality and care.

This led the sector to believe the Government recognised the importance of these early years so why would we go back to ratios shown to be to the detriment of young lives?

More importantly why would we want to lower the level of training required from a qualified Diploma or above to that of a certificate level 3?

Certificate level 3 is now set as a minimum entry point for the industry and one that our organisation agrees with. It demonstrates a commitment to quality care and a commitment by the employee to the provision of providing quality care.

As an organisation that supports and accommodates student placements it must be noted that there is a significant difference between Certificate 3 and that of a Diploma. The level of study that one undertakes to achieve a Diploma is certainly different to that of a Certificate 3. There is a marked difference in the literacy levels of the two. The educational aspect and the knowledge this brings is also different. Certificate Level 3 is considered to be at a very basic entry level, it was never intended for these people to be “in-charge” of a room or group of children with the ability to support high quality programming.

The commission states in the report (p.472) that the ECEC workforce is underpaid and undervalued. This being the case, why would the Government put more pressure on the Certificate 3 employees – the least qualified?

What would be in the best interest to the child not providers?

What would this tell the community/ society about how we value our youngest and most impressionable children?

It is a well-known fact that our brain develops very quickly in the first 3 years of life. “The first three years of life are a period of incredible growth in all areas of a baby's development. A newborn's brain is about 25 percent of its approximate adult weight. But by age 3, it has grown dramatically by producing billions of cells and hundreds of trillions of connections, or synapses, between these

cells.” <http://www.zerotothree.org/child-development/brain-development/> Armed with this information the importance of providing high quality programmes for children cannot be understated.

We would not support any changes made to this requirement.

### **Removing Preschools from the NQF**

As with the above, removing preschools from the National Quality Framework would in fact be a backwards step. It is a result of having to adhere to the NQF that preschools have had to build capacity to show how they provide quality care and education. In only having to abide by state regulations the national agreement for all EC services to meet National Quality Standards and Regulations is broken.

In addition, removing preschools would be to the detriment of the sector which already struggles with community misconception that only preschools provide education. A common platform is required.

### **Benefits for the Non for Profit Sector:**

The removal of pay roll tax exemption would have severe negative financial impacts on services, which in turn would equate to increased costs to families. It would be our recommendation that the Government increases its support for the Non for Profit Sector to provide and promote quality education and care for all children.

### **Extending the Scope of the NQF:**

Our organisation would support the extension of the National Quality Framework to include Occasional Care. It is worth noting here that the Commission report has recommended that “nannies” and “au pairs” be considered in the National Quality Framework. Whilst this would reduce the burden of finding suitable child care for families, it would become an administration nightmare. The report does not state how this would be administered and who would regulate these services. As an organisation that complies with relevant regulatory bodies we would advocate for a more stringent approach to ECEC.

### **Conclusion:**

The value of Early Childhood Education and Care needs to be at the forefront of any decision that is made by the Government.

Through the eyes of a child when asked what they like best about kindy.....

“I like the teachers” said Liam aged 3

“I like playing with my friends” said Alice aged 3

“I like playing with the dolls in home corner” said Myer aged 5

“I like playing with my friends and help pack away” said Zach aged 5.

Surely this is evidence that ECEC is simply the best for children.