



# Submission

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

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Submitted on behalf of Explore and Develop Lilyfield

Written by Susan Franco - Approved Provider

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I would like to start our submission acknowledging and appreciating the consultative approach that the Productivity Commission has taken in this process. It is encouraging to see so many voices from the sector offer advice and views on the issues which are being considered for change in the Draft Report process.

In our submission I will comment on a number of areas, which I hope can give perspective from an Operator in a LDC Service. I am happy to expand on any points should the Commission require this in the future?

By way of introduction, Explore and Develop Lilyfield is an independently owned and operated as a long hours Early Childhood education and care centre, whom operates within a franchise model made up of 22 operating centres. Our locations can be found at <http://exploreanddevelop.com.au/regions/>

We pride ourselves on high quality, education and care and whilst privately owned focus on ensuring affordability for our families. We are passionate Educators with a commitment to ongoing education for our staff and to ensure that we create relaxing and engaging play spaces for children aged 0-6 years of age.



My submission opens with a comment in regards to that all childcare reforms need to be focused on the best interests of children and viewing the productivity commission as an opportunity for social reform that can benefit many generations.

I am a working parent and like most families within my community I juggle a full-time job, parenting and schooling of young children. With over 85 families within my service I only have 3 families of preschool age children who do not work, the rest either work full time or part time. What is clearly obvious is the long hours of care the children are in (when their parents are at work) and what is noted more and more is the work demands of families are increasing due to the inflexibility of employers and the real financial pressures of modern living. I have seen more and more of the same families now working longer and harder and this is often at the expense of spending quality time with their children. For many of our families the only quality - relaxed time is spent on weekends.

Culturally the rights of children need to be the most important consideration in this childcare reform and this should then enable the rights of parents to be able balance work and home life so that children can have quality time with parents at reasonable hours to accommodate morning and evening mealtimes.

My second point is to discuss funding for Nannies. My centre has achieved an Exceeding Rating under the ACECQA Assessment and Rating process. We pride ourselves on creating a culture that supports our staff and families, with the ultimate goal that everyone is entitled to flourish within our community. This is children, families and staff. Our families send their child to long day as we provide education and care and they are seeking the opportunity for their children to be part of a community and to interact with peers. We are rigorous with our pedagogical planning and documentation to support all childrens' learning and to continue to stimulate and challenge children at all times. Our early childhood education and care centre is for many of our children their "home-away-from home" and we feel very blessed to be able to enhance and add to these children's lives.



To successfully achieve this day in day out we have worked tirelessly to have highly qualified staff with a preference for Early Childhood Trained or Diploma Qualified staff for more than half of our staffing requirements. I believe there is no way possible that Nannies will follow the National Quality Framework and that a Certificate 3 Qualification is not an adequate minimum level qualification. A certificate 3 is an entry level qualification and many working parents expect a much more rigorous qualification to care for their child/ren. With the shortage of ECT and Diploma trained already in the industry allowing Nannies to be funded under CCR will exacerbate this severe skill shortage. We already pay above award wages for our staff. We continue to be mindful of these costs within our business, to minimize our daily rate we charge to our families and feel that if Nannies are included our wage costs will be increased dramatically.

My third point is in regards to CCR payments to families. This has been capped at \$7500 per child per financial year. For this not to have increased with CPI is hurting many of our families. There is no doubt that Inner city living is more expensive than families living in outer metropolitan or regional areas. I believe Inner city families are disadvantaged with the Child Care Rebate and that consideration to what families are entitled too should be based on their childcare fees. Inner City families pay higher rents and have higher day care fees, yet get the same rebate entitlement. This is disadvantaging our families. Our day care fees are determined by our operational costs and rent is a significant portion of this. Within the Explore & Develop group I know my rent is equal to that of other outer metropolitan centres yet my centre is half the size. I see many of my families have their rebate exhausted by February, March or April each financial year and then need to struggle to pay the 100% gap of their childcare fees for the remainder of that financial year.



It is also important to note that in the time of opening Explore & Develop Lilyfield we have watched commercial property developers becoming increasingly more interested in Long Day Care opportunities (with the Leichhardt area). Whilst there is a clear shortage of quality childcare for Under 2 families it has also driven up market rents in a significant way. This is a real and problematic situation within the industry and this impacts the long term affordability of childcare for working families.

I am concerned by the consideration of separating "Pre-School" from the LDC under the NQF. Services that provide Education for 3-5 year olds have the guidance of the Early Years Learning Framework and all the components of the NQF. The application of the "curriculum document" and the "NQF guidelines" only differs as a result of the quality of the Service. 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, I see no logic in treating these structures differently other than allowing Preschool to work outside of a compliant environmental and to confuse parents. There has 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. It should also be noted that in other states Long Day Care Centres have access to Universal Funding for Preschool Children. Unfortunately NSW and the ACT do not and this does not make any sense and continues to impact families whom are seeking an extended hours preschool program. These families are consequently paying more out of pocket expenses for childcare when other states are being subsidized by the government.



I know many of my families will support me in advocating that highly qualified staff is a key determinant for them in placing their children in childcare and that it would not be acceptable in an Under 3 environment to have a Certificate 3 qualification as the maximum qualification. Typically a Certificate 3 employee is an entry level role and these children often need more nurturing, a more mature and supportive understanding, someone to role model and support their development which is often missing at an entry level role. If we create a sector where caring for babies is predominately managed by humans under 21 years of age then I believe this will pose a significant risk to children and families in the future.

Furthermore, children's development and the recognition of developmental delays has improved significantly over the last decade. Early Childhood settings offer an early alarm for children needing intervention support. Experienced and qualified Educators have the training to assist children develop their speech, their movement and their social interactions, removing these professionals from the sector would ultimately result in the calling on other resources such as ISP, Speech therapists, Occupational Therapist etc. and this would result in increased cost in the system rather than less.

Lastly the discussion around pay equity is an important one and one I appreciate is hard to resolve. The variation between Primary paid teachers and Early Childhood teachers is a key factor (as is longer holidays) in ECT's not being attracted to the Sector. Both complete the same degree. The message this sends is that teaching in Early Childhood is less valuable than in Infants and Primary? Research states otherwise.

Thank you very much for taking the time to read through our submission and as stated earlier I am available for any consultation regarding LDC settings post this process if you feel it appropriate?

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