

Phoenix Children's Services appreciates the opportunity to comment on the Productivity Commission's draft report.

#### Concerns

#### Qualifications

- We strongly support the retention of the current requirement for 50% of our contact educators to hold or be actively working towards a diploma qualification or higher.
- We do not agree that the maximum qualification for educators working with under 3's should be a Certificate 3.

Our organisation made a significant commitment to assist our educators to meet the qualification requirement of the National Quality Framework. Initially there was some resistance from mature experienced unqualified educators with years of experience working in long day care. However, every single one of those educators has expressed the opinion that they are glad that they now hold a Certificate 3. They talk about the knowledge they now have and how it makes a positive difference in their work with children. Because they worked within programs coordinated by diploma and degree qualified educators they knew what to do, but that they now have a better understanding of why. Many of these educators are continuing to study and have now enrolled in Diploma courses. Of the 62 educators who work in our long day care centres only seven now hold a Certificate 3,(this includes some casual on-call educators) the rest either have or are actively working towards a Diploma, Advanced Diploma, Degree or Masters Qualification.

All of our room teams are led by Diploma or Degree qualified educators, this includes our under 3 rooms. The Certificate 3 qualified educators working in these programs are fantastic educators, however, they acknowledge and value the additional level of understanding and capacity that their degree and diploma qualified colleagues bring to the team.

In reply to an email to our the parents of children using our services asking for comment in regards to the reduction of qualification requirements a mother replied

“This is appalling on so many levels....not only would services struggle to provide quality care but I would think it would also make child care an extremely unattractive career and push down wages”

#### Averaging out ratios over the day or a week

Our organisation does not agree with this proposal and asks that this suggestion is not proceeded with. The staff child ratios in the current system are minimum requirements. Underpinning our organisations commitment to providing quality services we strive to work at better than required ratios in order to meet the individual need of the children in our care.

## Simplifying the National Standards

Our organisation believes that much of the initial outcry regarding the move to the new system was a reaction to the sector not having time to adjust to a system that was quite upfront about 'raising the bar' in relation to quality. As we have had time to work through the process we believe that it is a strong system that encourages reflection, questioning, and stretches us to improve. We welcome review of the system but cannot support any watering down of the expectations. This is written at a time when only one of our services has had a validation visit and the outcome of that visit is not yet known. Regardless of the outcome of the assessment we believe that the service we provide has been enhanced by the process, and we feel empowered to continue with the cycle of self-reflection and quality improvement.

Working through the process, supporting our people to gain higher qualifications, accepting the challenge of questioning our practice, actively seeking opportunities to improve the physical environments of our services has led to an increased sense of pride in our organisation and the care we provide. We feel supported by 'the system', yes it is challenging, under resourced and we are 'time poor', but we believe that it is possible, given time, for the sector to rise to the challenge so long as the system is kept intact.

## Removal of Pay Roll Tax Exemption

The proposal to remove exemption from pay roll tax, if implemented, will have a devastating effect on our organisation. As a not for profit organisation we do not have the capacity to borrow. Payroll tax exemption has allowed us save over a number of years to maintain and improve our physical environments without having to pass the cost of this on to parents.

## Positives

We welcome the proposal to replace CCR and CCB with a single, streamlined and means-tested payment to be paid directly to services. We applaud the Commission's recommendation that an additional \$1billion be allocated to the sector. The recommendation that all subsidies be linked to the NQF is supported by us as it acknowledges the importance of ensuring that the best interests of children are championed by the system.