

Childcare and Early Childhood Learning  
Productivity Commission  
GPO Box 1428  
CANBERRA CITY ACT 2601

Dear Commissioner

Communities@Work would like to thank the Productivity Commission for the opportunity to provide feedback on the draft report into Childcare and Early Childhood Learning.

Communities@Work provides a broad suite of quality community programs of social value and practical benefit. Established and developed in Canberra, we are a local organisation that understands local needs. Our innovative and progressive culture seeks to respond to changing community needs in a thoughtful and constructive manner.

We operate 40 Out Of School Hours Programs, 13 Early Education and Care Centres and currently oversee 150 Self – Employed Family Day Care Educators. Additionally we have a small number of In-Home Care Educators.

Firstly Communities@Work would like to acknowledge and welcome the following recommendations in the draft report:

- All states and territories should adopt the national requirements as a minimum for ratio's and qualification requirements.
- Communities@Work welcomes the idea of exploring alternative ways to determine a service's rating under the National Quality Framework to ensure each service is rated based on overall quality.

Communities@Work does however oppose the following recommendations and strongly supports a review of the following;

- All educators working with children aged birth-3 years are only required to hold a Certificate III or equivalent. "Early childhood education requires a depth and breadth of knowledge and skills to work with infants, toddlers, young children prior to school or with young children in their early years of school. It requires as much knowledge, skills and attitudes as it does to work with older children." (Analysis of Curriculum/Learning Frameworks for the Early Years (Birth to Age 8), April 2008)

Critical neurological and biological systems are at their most rapid growth during these critical years of development and are impacted upon by relationships, environments and support networks for children and families. "The most significant factor affecting quality appears to be caregiver education, qualifications and training." Huntsman, 2008p,iii)

As part of our feedback to this recommendation, Communities@Work strongly supports an allocation of funding for ongoing longitudinal studies into the impact of early education and care on outcomes for children, in order to fully understand the costs and benefits to our workforce and early intervention.

- Communities@Work feels strongly that all children should have the opportunity to attend a quality early education and care service. In some situations having the opportunity to attend a service may be the only intervention a family requires to support them during difficult times. We support the continuation of the availability of 24 hours care or more across a week for those who do not meet the current work/study priority areas.
- We believe that quality care and education occurs all hours a service is open for. Therefore, we do not support the notion of averaging child to staff ratios over the course of the week. We believe this will jeopardise the safety and quality of services.
- Communities@Work would welcome a review to the educational and child based reporting requirements for outside school hours care services. We do not believe it would be in the best interest of children or achieving quality programs to remove all requirements however, would welcome a more appropriate way of reporting considering the amount of hours a service is open for.
- As a non for profit organisation we do not support the removal of fringe benefit concessions. Having this advantage allows us to offer financial incentives. Commercial services tend to have the opportunity to provide staff bonuses and other financial incentives to their employees. Cash incentives are not viable in the non for profit area.
- To ensure consistency across age groups and care types we feel it is imperative that pre-school's remain under the National Quality Framework.

Once again thank you for the opportunity to provide feedback on the draft report.

Communities@Work would be more than happy to discuss our view points if the Commissioner is available.

Yours Sincerely

Lynne Harwood  
Chief Executive Officer  
Communities@Work

## References

Curriculum/Learning Frameworks for the Early Years (Birth to Age 8), April 2008

Huntsman, L. (2008). *Determinants of quality in child care: A review of the research evidence*. Available from: [www.community.nsw.gov.au/docswr/assets/main/documents/research\\_qualitychildcare.pdf](http://www.community.nsw.gov.au/docswr/assets/main/documents/research_qualitychildcare.pdf).