



4 September 2014

## SUBMISSION TO THE PRODUCTIVITY COMMISSION INQUIRY INTO FUTURE OPTIONS FOR EARLY CHILDHOOD EDUCATION AND CARE

UNSW Australia Early Years acknowledges the vitally important role that high quality early childhood education and care plays in helping to facilitate the best possible start in life for our nation's children. We urge the commissioners to make recommendations to the government that enable equitable and affordable access to high quality ECEC for all families and children and to reinforce the understanding that high quality ECEC is primary driver for sustained growth of our nation's productivity now, and into the future.

At Early Years we recognise that children are active and competent learners, constantly seeking new discoveries and are an inexhaustible source of inspiration, imagination and creativity from birth, and as such take great issue with the Productivity Commission's draft recommendations which seek to diminish the quality of educational opportunities available to our nation's youngest and most vulnerable.

In addition to the comments which follow in the section below Early Years (and a great many other voices in the ECEC profession) are deeply concerned about and vehemently disagree with a number of the commissioners' recommendations as outlined in the draft report released 22 July 2014.

Early Years is deeply concerned that the commissioners are recommending a reduction in the qualification requirements of educators working with children under the age of 36 months to a certificate three. Children of all ages are entitled to high quality learning opportunities and educators who are equipped to confidently and expertly manage the daily challenges and intricacies associated with ECEC. The certificate three qualification does not adequately train these educators to effectively conduct high quality programs for children birth to 36 months- approximately 40 hours of study time is allocated to "providing care to babies and toddlers". At a time when the rapidly growing brain is at its most elastic and primed for learning, these children require much more than basic "care". They deserve thoughtful, intuitive and individualised learning opportunities.

The draft recommendations to relax educator to children ratio requirements should be immediately reconsidered and we beseech the commissioners to categorically reject the recommendation to allow services to temporarily dip below regulated ratios.

It has been suggested that various other elements of the recently implemented National Quality Framework be scaled back just two years after it was first implemented. We strongly oppose any roll-back of the NQF which impinges on quality.

Likewise, we believe it to be unwise to open up ECLS funding to individual nannies who generally provide a very different educational experience and environment to that of formal ECEC services. The task of monitoring regulatory compliance and measuring the quality of educational programs offered by nannies would be an extremely difficult task. Does it not make better economic (and social) sense to fund services (who support communities) rather than funding individual nannies servicing individual families?

We encourage the commissioners to accept all children's' learning and development needs as the baseline consideration when examining and identifying future options for ECEC, including children under the age of 36 months. We hope that the commissioners will focus not only on the economics of ECEC, but the societal impacts any recommendations they make may have on our nation's youngest and most vulnerable.

We hope, through this inquiry that the commissioners will help to shift the economic debate away from one where ECEC is deemed a "cost" to the taxpayer, to one where ECEC is rightfully recognised as an "investment".

### **Responses and comments to specific draft recommendations and information requests**

#### **1. DRAFT RECOMMENDATION 12.2**

*The Australian Government should combine the current Child Care Rebate, Child Care Benefit and the Jobs Education and Training Child Care Fee Assistance funding streams to support a single child-based subsidy, to be known as the Early Care and Learning Subsidy (ECLS). ECLS would be available for children attending all mainstream approved ECEC services, whether they are centre-based or home-based.*

- Great idea to simplify the government fee assistance funding for parents. Apart from the obvious advantages to families, services will spend less time answering family enquiries about a currently complex and at times confusing system. Allowing the staff to focus on the needs of the children and families.
- Means tested – with the larger proportion of subsidy going to the families that need it the most.
- We are deeply concerned about the regulatory body's ability to ensure standards, regulation and laws, in addition to high quality educational practices are maintained in home-based services, in particular nannies.

#### **2. DRAFT RECOMMENDATION 12.4**

*The Australian Government should fund the Early Care and Learning Subsidy to*

*assist families with the cost of approved centre-based care and home-based care. The program should:*

*• support up to 100 hours of care per fortnight for children of families that meet an activity test of 24 hours of work, study or training per fortnight, or are explicitly exempt from the criteria.*

- Equity and social justice issues come into play- all children should be entitled to high quality ECEC regardless of their families work/ study status.
- Universal access to ECEC, not just pre-school

### 3. DRAFT RECOMMENDATION 8.5

*Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny.*

- The service provided by nannies is significantly different to the service provided by a high quality early education and care setting and is extremely difficult to monitor and regulate
- Would surely increase the burden on ACECQA in assessing and rating services under the NQF and be extremely difficult to implement
- Reduces the community spirit and forgets how critical ECEC services are as a central hub of support for many families simultaneously
- Poor use of funds to subsidise individuals – subsidising ECEC services would bring greater benefit to a greater number of families
- Protection of nannies and protection of children. Who is going to provide support to the nannies and facilitate professional development opportunities, ensure that they keep up with current trends and provide professional networking opportunities? Professional networking is often the most effective professional development.

*National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services.*

*Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.*

- Services in the 'formal' sector are yet to be comprehensively rated, assessed and supported in their mission for high quality ECEC
- Certificate three qualifications are intended for support workers and not for primary/sole educators as is often the case with nannies and FDCs.

#### 4. INFORMATION REQUEST 8.3

*The Commission seeks feedback on making the places of children who are on an extended absence available to other children on a short-term basis. In particular, the Commission is interested in disincentives or regulatory barriers that discourage or prevent services from implementing these arrangements.*

- High quality centres put a lot of thought, time and energy into the induction and orientation process which supports children having a smooth transition into care – its not as simple as ‘dropping your child off and leaving’. Not to mention the administration processes involved with new enrolments – immunisation register/ dietary requirements/ special needs/ interests etc. etc.
- Children’s needs and rights are paramount here. Children are entitled to be in environments where they feel safe and secure – short term placements are usually okay with children that are already enrolled i.e. picking up extra days
- High quality ECEC services are built on a foundation of strong, trusting and intuitive relationships – it is not babysitting.

#### 5. DRAFT FINDING 8.1

*Funding to providers has an important role to play in improving accessibility to ECEC for children with additional needs, or who live in locations without access to ECEC. There is scope to improve current programs which deliver assistance directly to providers:*

- The Community Support Program has not achieved one of its main objectives of improving access to ECEC services in rural and remote areas. Further, it is unclear whether it has been effective in bringing ECEC services to disadvantaged areas where they would otherwise not have been provided
- Services funded under the Budget Based Funded Program are not all ECEC focused and there is a lack of transition pathways for services to become viable and be brought within the mainstream ECEC funding arrangements
- The Inclusion and Professional Support Program requires additional resourcing in order to better meet its policy objectives.

#### 6. DRAFT RECOMMENDATION 5.2

*Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.*

- Certainly. Families use ECEC services not only to care for and educate their children, but to support them through an endless variety of situations and provide access to highly valued information, referrals, expertise and advice

- Services should be funded to employ a specialised additional needs worker

#### 7. DRAFT RECOMMENDATION 12.10

*The Australian Government should provide per child preschool payments direct to long day care services for 15 hours per week and 40 weeks per year, where long day care services do not receive such funding from the states and territories.*

- Extend 'universal access' to the younger ages.
- The 15 hours per week model came from UK where children do sessional care – a new model of universal access should be developed to better suit long day care services and the educational program that is provided – it should cover the entire day – rather than 15 hours it should be minimum 2 or 3 full days.

#### 8. Information request 5.1

*What are the optimal hours of attendance at preschool to ensure children's development and what is the basis for this?*

- Depends on the centre and each individual child, but the preschool program begins from the moment a child steps into the centre at high quality services and commences at whatever age the child starts attending.

#### 9. DRAFT RECOMMENDATION 10.1

*In line with the broad level recommendations of the Productivity Commission's 2010 study into the Contribution of the Not for Profit Sector, the Australian Government should remove eligibility of not-for-profit ECEC providers to Fringe Benefit Tax exemptions and rebates.*

*State and territory governments should remove eligibility of all not-for-profit childcare providers to payroll tax exemptions. If governments choose to retain some assistance, eligibility for a payroll tax exemption should be restricted to childcare activities where it can be clearly demonstrated that the activity would otherwise be unviable and the provider has no potential commercial competitors.*

- This doesn't seem fair – An alternative approach could be to stop subsidising services that make a profit margin greater than 3%. If services are making a profit higher than 2-3% it is clear they are cutting costs and compromising quality.

#### 10. DRAFT RECOMMENDATION 12.11

*The Australian Government should redirect any additional tax revenue gained, or administrative savings from, removing ECEC related tax exemptions and*

*concessions to expand the funding envelope for ECEC.*

*For not-for-profit providers of block funded ECEC services to children with additional needs, the tax savings should be included in their block funding arrangements while these programs continue under the current funding agreements.*

- The government should stop funding private services that are driven by profits, not quality
- ECEC should follow a similar funding model as schools – they should not be making a profit, they should be considered a community service

#### 11. Information request 6.1

*The Commission seeks participants' views on impediments to employers providing flexible work arrangements for parents.*

- Absolutely it should be the employer's obligation to shape their workplace for the benefit of parents with young children this shouldn't be the obligation of the ECEC sector, just like schools are not obliged or pressured to change their opening/ closing times
- Large organisations should have an obligation to 'purchase' sponsored places in surrounding ECEC centres or if building a new place of work have a requirement to build in-house ECEC provisions.

#### 12. DRAFT RECOMMENDATION 7.2

*Requirements for educators in centre-based services should be amended by governments such that:*

- *all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent*
- NO! Births to three year old children are entitled to access high quality educational opportunities. Mounting research points to the qualifications, experience and skills of educators as main determinant of better outcomes for children.
- Educators working with birth to three year old children require extra training not less – between these ages is where the fastest growth happens, it is where families are at their most anxious, it is where staff need to make complex decisions, quickly and constantly reevaluating, reassessing, reprioritising. They need to be trained to be able to discuss challenging topics with parents, follow through with individualised routines, meet basic needs as well as develop close attachments as well as design thoughtful play spaces, and keep the babies and toddlers safe and constantly engaged...
- Certificate III staff have an entry level qualification only – they work best when

working closely with higher trained staff. There is only one limited training module in a certificate III qualification that concentrates on educating infants and toddlers, totally approximately 40 hours of study time.

- Babies and toddlers require familiarity and continuity and stability in order for secure attachments to be formed. If the requirement is for certificate III trained educators to work with infants and toddlers it means that when they up skill (which most do when they are in a high quality centre because they feel inspired and supported) then the baby and toddler room will have a revolving door of certificate III's with them leaving that room when they get a diploma which is far from what is best for the children.

### 13. DRAFT RECOMMENDATION 7.3

*Differences in educator-to-child ratios and staff qualification requirements for children under school age across jurisdictions should be eliminated and all jurisdictions should adopt the national requirements.*

- Yes – but the best ratios should be adopted not the worse! Tasmania previously had a 1:3 ratio for babies and was brought to a 1:4, which, from a high quality ECEC perspective makes absolutely no sense.

### 14. DRAFT RECOMMENDATION 7.5

*To provide services with greater flexibility to meet staffing requirements, ACECQA should:*

- *remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months*
- No. ECTs should have experience with and an understanding of children of all ages. Learning, development, growth and education begin at birth.
- All current NSW ECT's have already completed the birth to three year old requirement – this should be maintained, not reversed.
- *explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.*
- Yes, so long as said qualifications just as good as or better than Australian standards.

*All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.*

- Ratios are a proven way to minimise risk and keep children and educators safe – they should be adhered to at all times. Otherwise, we are saying that

sometimes it is important and other times its not – it will open the door for shonky operators to employ less staff and improve the profit margin at the expense of the children.

#### 15. DRAFT RECOMMENDATION 7.6

*Governments and ACECQA should:*

- *Urgently reconsider the design of the assessment and ratings system, giving particular consideration to finding ways to increase the pace of assessments*
- Without degrading the assessment and ratings system. Quality is a difficult metric to measure hence why the assessment and ratings process is comprehensive and time consuming.
- It is a relatively new system which takes time to roll it out.
- The NQF rating system was established around the same time of the collapse of ABC learning which meant hundreds of centres required additional support.
  - *explore ways to determine services' ratings so they are more reflective of overall quality*
- Yes. Quality is broad measure and often covers many community-specific factors/provisions/expectations.
- The framework is already there – of course improvements can always be made – but let's not throw the baby out with the bath water!
  - *abolish the 'Excellent' rating, so that 'Exceeding National Quality Standard' is the highest achievable rating.*
- No. The additional rating process is an indicator of a centre's commitment to providing high quality.
- As a sector, and a nation we must aim for higher standards, not lower.

#### 16. DRAFT RECOMMENDATION 7.7

*Governments, ACECQA and regulatory authorities, as applicable, should:*

- *abolish the requirement for certified supervisor certificates*
- Why go backwards? This is already in place – there should be a determination between who is in charge at every minute of the day. This system offers families reassurance and ensures that at any given time there is one person who is accountable.
  - *provide more detailed and targeted guidance to providers on requirements associated with Quality Improvement Plans, educational programming, establishing compliant policies and procedures and applying for waivers*

- High quality centres already get their guidance; there are many peak bodies that do this already.
  - *explore potential overlaps between the National Quality Framework and state and local government requirements as part of the ongoing review of the Framework, and ensure any identified overlaps are eliminated*
- Yes as long as the children rights are at the centre of the decisions.

#### 17. DRAFT RECOMMENDATION 11.1

*Governments should ensure, through regulatory oversight and regular audits by the Australian Skills Quality Authority, that Registered Training Organisations maintain consistently high quality standards in their delivery of ECEC-related training.*

- Yes – big tick!

#### 18. DRAFT RECOMMENDATION 13.2

*The Australian Government should establish a program to link information for each child from the National ECEC Collection to information from the Child Care Management System, the Australian Early Development Index, and NAPLAN testing results to establish a longitudinal database.*

*Subject to appropriate data protection methods, this information should be made available for research, policy analysis and policy development purposes. The ability of researchers to access unit record information should be permitted subject to stringent privacy and data protection requirements.*

*The Australian Government agency, which is the custodian of the Child Care Management System, should provide a de-confidentialised extract from the database each year that interested parties can use for research and planning purposes.*

- Yes – so long as the information collected considers the whole child and relates to early learning through play NOT assessment.

Yours sincerely,

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