

PRODUCTIVITY COMMISSION EARLY CHILDHOOD EDUCATION AND CARE ENQUIRY 2024

WHO ARE WE?

Wonderschool Early Learning Centres is a for profit early childhood education and care provider. We have one centre located in Chifley, NSW and six centres in the ACT. We believe and value the rights of all children and work first and foremost from a place of respect. We prioritise staying connected to children, their families, to our communities, to nature and to learning about Aboriginal and Torres Strait Islander culture and ways of being.

The Wonderschool Approach focuses on building diverse, inclusive, and robust learning communities which are unique, and held together by common values and a sense of belonging and awe.

We draw on several influences, theories and practices that guide our approach to working with children at Wonderschool and our approach is ever-changing as we look to the latest research to be the best educators we can be.

We believe that there several fundamental issues with the education and care sector. Below we have outlined what we feel are the important issues:



1.	Remuneration and recognition
2.	Review of the education and care services national law and regulations
3.	Access to early childhood education and care
4.	Review of all Registered Training Organisations (RTO's)
5.	Change to the Child Care subsidy (CCS)
6.	Inclusion support funding

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| 7. | Review of the National Quality Standard assessment and rating process |
| 8. | Registration systems for educators mirroring teacher or nursing registration with requirements for ongoing professional development participation |

1. REMUNERATION AND RECOGNITION

In the realm of government decision-making, prioritising remuneration and recognition is crucial. To achieve this, we propose the following measures:

- **Annual Wage Increases:** Align salaries with teaching awards, ensuring fair compensation for educators and support staff working in the education and care sector.
- **Increased Leave Provisions:** Extend annual and personal leave entitlements in accordance with the teachers' award.
- **Invest in Professional Development:** Allocate additional time for programming and study leave to enhance educators' skills. Knowledge and practice.
- **Increase in superannuation:** Increase superannuation benefits for all education and care employees.

Despite our commitment, we observe a concerning trend: experienced and passionate professionals leaving our sector for better-paying opportunities in the public service and retail industries. Addressing this disparity is essential for retaining skilled educators and maintaining the quality of early childhood education.

2. REVIEW OF THE EDUCATION AND CARE SERVICES NATIONAL LAW AND REGULATIONS

Under the current National Law, offences are primarily directed towards Approved Providers and Nominated Supervisors in relation to centre-based care. For example, s165 and s167 which relate to offences around adequately supervising children and protecting children from harm do not apply to staff members at education and care services. This can impact the individual staff member's accountability for their own duty of care of the children. If a staff member were to inadequately supervise the children, for example they left the children unsupervised and a serious incident occurred as a result of this inadequate supervision, whilst the Approved Provider or Nominated Supervisor may be able to implement an employment action under Fair Work, the National Law does not cannot

hold the staff member accountable. This process can be further compounded when Approved Providers and Nominated Supervisors have reporting obligations, for which they can then face Administrative Decisions that can have fines attached under the National Law. In certain cases, when an individual provides information implicating the Approved Provider or Nominated Supervisor to the Regulatory Authority, whether allegations can be substantiated or not, the staff member can be protected from employment actions as a result of the information provided despite the fact that it is their actions that contributed to the incident.

In general, when incidents occur in early learning services, the response by regulators is increased compliance scrutiny. Whilst increased compliance systems can generate data for regulatory authorities that may indicate improved outcomes for children, it does not always consider the impact on educators' capacity to implement these systems.

The oversight for the education and care sector under the National Law and Regulations varies significantly from the oversight of school systems.

Regulatory bodies must actively engage with Development Approvals (DAs) to ensure effective oversight. Specifically, service developments should adhere to appropriate group sizes, with room capacities not exceeding 2 to 3 times the educator-to-child ratio. For instance:

- Preschool rooms: Capped at 22 children.
- Toddler rooms: Ideally limited to 10 or 15 children.
- Nursery rooms: Restricted to 8 or 12 children.

Additionally:

- Lease Agreements: Regulate commercial landlords' earnings per place, given the significant federal funding allocated through the Child Care Subsidy (CCS) program.
- Self-Reporting Changes: Address the increased administrative workload resulting from notification updates.
- Legal Accountability: Shift responsibility from individuals to entities (Nominated Supervisors and Approved Providers).

Other considerations include:

- Jurisdictional Consistency: Address inconsistencies across different regions.

- **Educator Ratios:** Mandate more Early Childhood Teachers (ECTs), ideally one per room, with dedicated funding to support this initiative.

By implementing these measures, we can enhance the quality and sustainability of early childhood education.

3. ACCESS TO EARLY CHILDHOOD EDUCATION AND CARE

Increased Child Care Subsidy: Augmenting subsidies for families can help prevent annual fee increases, allowing services to invest in their staff, resources, training, programming, and equipment.

- **Direct Government Preschool Funding:** Adopting a model like Victoria’s “Best Start, Best Life” would empower families to choose their child’s preschool provider and receive direct funding. This approach supports the presence of more Early Childhood Teachers (ECTs) in educational environments for all ages of children, not just preschool.
- **Relaxed Qualification Requirements for Inclusion Support:** Streamlining these requirements can facilitate smoother access to support services and staff to support teams.
- **Addressing Unaffordability:** Systemic challenges must be tackled. Recent fee increases, driven by inflation and operational costs, underscore the need for sustainable solutions. There are systemic issues which are not being addressed and it is becoming more and more unaffordable for families to access and afford care and education. We have recently increased our fees 7% due to inflation in rent, food, resources, and equipment. This also considers the voluntary increase in wages and conditions for our team of employees.

4. REVIEW OF ALL REGISTERED TRAINING ORGANISATIONS

We strongly advocate for a comprehensive overhaul of all RTOs operating in the field of early childhood education and care. Our concerns are grave, stemming from the apparent lack of robust regulatory oversight. Specifically, we have observed significant gaps in the qualifications delivered by these RTOs.

During our interviews with candidates, we encountered alarming instances where their knowledge of the National Quality Framework and the education and care sector was severely limited. These individuals allegedly achieving their qualification without meeting the requirements of the Australian Qualification Framework. This deficiency was evident both during interviews and in their initial days on the job. To ensure the highest standards in early childhood education, urgent action is required to address these shortcomings.

We also note that even qualifications that are delivered effectively result often times in educators falling short of meeting the obligations of the role. Educators will implement practices that were discouraged from the onset of

the introduction of the EYLF and NQF in 2010, yet they completed their qualifications only recently. Many educators entering the workforce are poorly equipped to meet the needs of the sector. This includes qualifications of all levels.

In summary, we urge swift action to enhance the quality of qualifications delivered by RTOs, ensuring that educators are well-prepared to meet the needs of young learners and uphold the highest standards in early childhood education and care.

5. CHANGE TO THE CCS

The CCS is a very complex and confusing funding model. We would like to see the following changes considered:

- Fund providers directly with child care subsidies rather than families. We believe this will help with making the cost of child care more affordable for families.
- We would also like to see the removal of the activity test for families. Removing this test could simplify access to early childhood and making it more accessible for all families regardless of their employment or study commitments.
- Streamline the process and make it very clear to all stakeholders who utilise CCS by
 - Providing families with information that is easy to understand and follow.
 - Simplify the administration process for all users.
 - Allow users to provide feedback and suggestions.

6. INCLUSION SUPPORT FUNDING

The current process for accessing inclusion support can indeed be cumbersome for families and centres. Simplifying this process is crucial.

The National Disability Insurance Scheme (NDIS) is a well-established framework in Australia that provides support to individuals with disabilities. Leveraging the NDIS for inclusion support could streamline the process. By allowing families to arrange their own support workers through the NDIS, families gain more control over the services their child receives. This personalised approach can enhance the quality of support. Children with diverse needs require educators who are well-trained in inclusive practices and behaviour management and knowledge around restrictive behaviour management.

Investing in professional development and specialised training for educators is crucial. This could include workshops, specialised training, and ongoing learning opportunities. Having educators with expertise in inclusive practices ensures that all children, regardless of their abilities, receive high-quality care and education.

Relaxing the 50/50 Requirement in support of inclusion:

The current requirement for a 50/50 ratio of children with and without additional needs can sometimes limit the flexibility of services to provide additional care for children.

- Relaxing this requirement could allow for more tailored support. For instance, if a service has a higher proportion of children with additional needs, it can allocate resources accordingly.
- Early Childhood Teachers (ECTs) play a pivotal role in inclusive practices. Having more ECTs available would enhance the quality of education and support provided.

Professional Development Funding:

- Allocating funds specifically for professional development is essential. This investment benefits both educators and children.

Areas of focus could include:

- Inclusion Training: Educators learn strategies to support diverse learners effectively.
- Behavioural Support: Techniques for managing challenging behaviours.
- Collaboration Skills: Building partnerships with families and external support agencies.
- Specialised Training: Targeted training for specific disabilities or developmental delays.

7. REVIEW OF THE NATIONAL QUALITY STANDARD ASSESSMENT AND RATING PROCESS

To streamline the Assessment and Rating (A&R) process, we recommend assessing each quality area individually. This approach allows assessors to build positive relationships with each center and focus on quality and authenticity. Including a quality area or two during compliance checks can reduce stress, promote authenticity, and maintain a quality focus.

However, it's important to note that the A&R process primarily generates data for government policy assessment. There is no proof that it directly improves outcomes for children or the sector. Currently, Education and Care remains separate from mainstream education under the National Quality Framework (NQF). Advocacy efforts could consider broader reforms to position education and care within the education system.

8. REGISTRATION SYSTEMS FOR EDUCATORS MIRRORING TEACHER OR NURSING REGISTRATION WITH REQUIREMENTS FOR ONGOING PROFESSIONAL DEVELOPMENT PARTICIPATION

A carefully planned registration system for early childhood educators could bring several benefits to the early childhood sector:

- **Professional Recognition:** Registration can help elevate the status of early childhood educators, aligning them with other professionals such as teachers and nurses¹. This could lead to greater recognition of the value and importance of their work.
- **Quality Assurance:** Registration systems often involve certain standards of education and ongoing professional development. This can help ensure that all registered educators are equipped with the necessary skills and knowledge to provide high-quality early childhood education.
- **Consistency:** A national registration system can provide a consistent approach across different states and territories¹. This can make it easier for educators to move between regions without having to meet different requirements.
- **Community Contribution:** Registered educators can contribute significantly to their communities by providing foundational learning and success for young children.
- **Job Satisfaction:** Being a registered educator can bring a sense of purpose and job satisfaction as they experience the joy of making a real difference in the lives of young children.

However, it's important to note that while registration can bring many benefits, there is limited and mixed empirical evidence nationally and internationally to support the claim that it drives teacher quality and improves student outcomes. Therefore, the impact of a registration system would likely depend on its specific design and implementation.