4 March 2014

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

Emailed to: [childcare@pc.gov.au](mailto:prebudgetsubs@treasury.gov.au)

CC: The Assistant Minister for Education, The Hon. Sussan Ley, MP

Dear Presiding Commissioner Craik and Commissioner Coppel,

**Inquiry into Childcare and Early Childhood Learning**

The Association of Heads of Independent Schools of Australia (AHISA) appreciates the Australian Government’s concern that provision of childcare and early learning services should:

* Support the developmental needs of children in safe, nurturing environments
* Be flexible, affordable and accessible to meet the needs of families
* Support workforce participation.

The membership of AHISA comprises principals of 421 independent schools with a collective enrolment of some 421,000 students, representing 11.8 per cent of total Australian school enrolments.

Over 80 per cent of AHISA’s members lead schools that offer pre-Kindergarten services, through Early Learning Centres catering for children aged three to five years and/or childcare services for children six weeks and up. The majority of these services are offered on-campus and serve to:

* Provide high quality early learning experiences for children at critical stages in their development1
* Support the transition of children from early learning to school
* Meet the needs of families where both parents are working and who find value in a ‘one stop drop’ for all their children
* Play a role in human resources management – onsite childcare helps attract and retain quality teaching and support staff.

Many AHISA members’ schools with primary school years also offer Out of Hours School Care. A significant number of members’ schools with boarding facilities also offer families ‘day’ boarding options for their secondary school aged children, where day students might remain at school for co-curriculum activities, study with tutors and peers and an evening meal before being collected by their parents.

AHISA is a professional association for principals. The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia’s young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

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At the same time, AHISA recognises that affordable childcare supports workforce participation and therefore national productivity.

Many AHISA members contribute to the wider independent schools sector through service to their state or territory’s association of independent schools and generally manage their school’s membership of these associations. In recognition of this interlinked contribution, AHISA is writing in support of submissions to the Commission’s Inquiry by associations of independent schools. In particular, AHISA advocates that:

* **Government funding, legislation and regulation of childcare and early childhood learning provision must recognise and support a diversity of provider models to ensure the diversity of family circumstances and needs are met**
* **The co-location of childcare and early learning facilities with schools should be acknowledged as beneficial in assisting school staff and other families balance work and family commitments as well as contributing to the smooth transition of young children to school**
* **Regulation must avoid unnecessary duplication across the three tiers of government in both establishing facilities on existing school sites and in provision of services, and seek to minimise the regulatory burden on schools and care and early learning providers**
* **The distinction between approved and registered care providers and its subsequent impact on families’ eligibility for government support must be revised to ensure diversity and choice in care and early learning options are supported**
* **AHISA supports the suggestion of Independent Schools Victoria that government childcare subsidies should be linked to the amount of time that a child spends in education and care, rather than to the hours of operation of the service being accessed.**

AHISA would welcome further inquiry on any of the above comments and recommendations.

Yours sincerely,

**Phillip Heath**

AHISA National Chair 2013-15

Head of Barker College, Hornsby, NSW

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**NOTE**

1 Independent schools in Australia are acknowledged leaders and innovators in the provision of early childhood learning. For examples of early learning programs in AHISA members’ schools, including the co-location of early learning within an aged care centre, see ‘A good start: A survey of early childhood education in seven independent schools’ in *Independence*, Vol 33 No 1 (2008), available at [http://independence.realviewdigital.com/?iid=62579#folio=10](http://independence.realviewdigital.com/?iid=62579%23folio=10)