



## **SUBMISSION TO THE PRODUCTIVITY COMMISSION INQUIRY INTO EARLY CHILDHOOD EDUCATION AND CARE**

1. This submission is made following a meeting with the Productivity Commission and is based upon discussions the Australian Primary Principals Association (APPA) has held with state, territory and national principals' professional associations. It brings together the experiences of primary school principals have had with providing early childhood education and care, including before and after school care, for both primary and pre-school aged students. APPA recognises that the circumstances of primary schools vary greatly across the nation and that early childhood education and care may not be core business for some Australian primary school principals.
2. However, APPA has a legitimate interest in this area of public policy for the following reasons:
  - i. There are significant numbers of primary schools that operate or host Outside School Hours Care centres.
  - ii. An increasing number of primary schools are offering or hosting pre-preparatory programs for younger siblings of students or other infants in the local community.
  - iii. The quality of early childhood education available to Australian communities has a proven impact on the learning outcomes of school students.
3. This submission addresses four key points:
  - i. the need for legislative reform;
  - ii. the need for regulatory alignment across all jurisdictions;
  - iii. the importance of early childhood education for all children; and,
  - iv. the need to minimise impediments and costs to quality early childhood education and care services.

### **THE NEED FOR LEGISLATIVE REFORM**

4. Early Childhood Education and Day Care is often provided in schools or in association with schools. APPA recommends that all education and outside school hours childcare services be governed by single legislative instruments at both state and territory, and commonwealth levels. This would be an entirely rational action as the daily transition from school to the outside school hours care facilities should be seamless for both students and staff.

Unification of the laws governing these vital service industries would also offer respect for the role of early childhood workers in building stronger Australians individually and as a society.

## **THE NEED FOR REGULATORY ALIGNMENT**

5. Presently, schools operate under regulations provided by state or territory education departments while outside school hours care centres operate under the National Quality Framework (NQF) implemented by state and territory regulatory authorities. Schools and outside school hours care centres generally share facilities on a daily basis. Both these reporting and compliance arrangements cover children up to the end of primary school.
6. The different regulations cause confusion and frustration for educators and service providers. For example, the refusal of the NQF regulatory authority in at least one jurisdiction to accept electronic copies of policy documents creates an unnecessary workload. The student to teacher ratios before, during and after school should be the same. A primary school leader reported her frustration with the fact one set of regulations allowed a specialist physical education teacher to supervise a class of twenty students in the school pool at five minutes to three in the afternoon while another set of regulations applying at five minutes past three the same afternoon allowed the same teacher with the same children in the same pool to supervise only five students. (see box)

In our schooling context a qualified part-time PDHPE teacher works with classes of primary children in a 16.5m pool that is of a consistent shallow depth during the school day. The onus is on us as a school to mitigate risk to a level that would be deemed 'reasonable' if having to legally defend the decision. The same pool, with the same staff (as our PDHPE teacher is also the registered supervisor of our After School Care Program) and with the same children (our centre has only enrolled children from the school) in our Out of School Hours Program restricts swimming activity by imposing a 1 to 5 ratio as determined by the ACECQA. This is irrespective of the nature of the pool, the age of the students or the qualifications of the staff.

It is impossible to write categorical mandates for all contexts. Thus the recommendation is that the same legal expectations that exist in schools be also applied to the Out of School Hours setting. In this way the onus is on the provider to risk assess each activity and to ensure suitable guidelines, ratios and practices are in place to ensure all children and staff are safe as happens in schools currently. It could well be argued that, even with a 1 to 5 ratio, it is inadequate if the staff members are non-swimmers, the pool is deep or the students are all in Kindergarten. Yet when the staff are well qualified, the pool is shallow and the students are older the circumstances warrant a very different ratio. Placing the responsibility with the provider to determine safe levels and then holding them accountable to the same legal standards as determined by the NSW Board of Studies would seem a much more reasonable pathway and enable Out of School Hours settings to offer the best of learning and health play opportunities for children in care.

7. The differences in regulations between the National Quality Framework that regulates Out of School Hours Care and the State or Territory Government documentation that regulates schooling contexts creates significant inconsistencies that substantially limit the quality of programs in the Out of School Hours setting.
8. APPA recommends an audit of all regulations and guidelines to increase alignment wherever possible and within the framework of not increasing compliance and documentation requirements.

### **THE IMPORTANCE OF EARLY CHILDHOOD LEARNING FOR ALL CHILDREN**

9. Not all children attend outside home early learning or care activities. Some children have very limited and constrained interactions with other children and adults outside their immediate family. These children rely upon input from parents and carers in the home for their early learning experiences. Some children do not benefit from quality early learning because parents are either not aware of the types of activities that should be offered or believe they do not have the necessary skills to provide them.
10. Evidence cited by APPA in the recently completed Principals As Literacy Leaders with Indigenous Communities project indicates there is much that can be done by parents and carers with very limited literacy skills in Standard Australian English to foster reading readiness in preschool aged children.
11. All Australian parents wanting to maximise educational opportunities for their children would be interested in increasing the repertoire of activities available to them to improve school readiness in their children.
12. APPA recommends resourcing be provided by the Commonwealth Government to develop and implement early childhood learning programs for parents caring for their children at home. With the dividend of lower levels of intervention in the later years of schooling this resourcing would be an investment in the nation's future.

### **THE NEED TO MINIMISE IMPEDIMENTS AND COSTS TO EFFECTIVE EARLY CHILDHOOD EDUCATION AND CARE OPERATIONS**

13. Where nationally consistent approaches to compliance and reporting arrangements make possible economies of scale, those savings could be passed on to services. For example, APPA members report a large variation in the cost of working with children checks. Currently, fees range from approximately \$40 in one jurisdiction to approximately \$100 in another. It appears that the Commonwealth undertakes these checks for under \$40 per

request. APPA recommends schools and services in all jurisdictions be allowed direct access the Commonwealth Agency responsible for these checks.

#### **OTHER ISSUES RAISED BY THE APPA NATIONAL EXECUTIVE COUNCIL**

14. Many primary school principals have an Early Learning Centre (ELC) attached to their schools and therefore 'wear the hats' of both principal and ELC director. This sees principals as the nominated supervisors for the centres and, as such, they must be very familiar with the Early Years Framework and attached regulations. This has considerable implications in terms of time away from school tasks and responsibilities; the knowledge base and administrative load required to provide quality service; and, the additional responsibilities for which the principal may not be, in a sense, qualified to meet.
15. In situations where the principal is responsible for the ELC it should also be said that principals are not always financially remunerated for this role and, as directors, are often not replaced when on leave or away from the school.

#### **CONCLUSION**

16. The role of early childhood education and care service providers is crucial for the health and wellbeing of our children. The benefits they provide should be available to every young Australian.