**Productivity Commission into Childcare and Early Childhood Learning**

**Submission by Sarah O’Donnell- Springvale Service for Children**

Springvale Service for Children is a not for profit service located in the southern region of Melbourne.

The demographics of our service show an exceptionally vulnerable community, with 37% of children who attended prep in 2012 showing as developmentally vulnerable in at least one domain of the Australian Early Development Index (AEDI).

Springvale Service for Children (SSC) commenced operation in 2009. At this time we amalgamated four children’s services into one. Three of the childcare services were barely operational, operating at 50% capacity. The programs had been reviewed by DEECD and had come close to failing the accreditation process. Over the past five years our educators have worked hard to change our service from just a ‘care’ service to a service that provides quality educational programming, assessed by the Department of Education and Early Childhood Development as an exceeding service.

 As a service, we aim at all times to provide children with experiences of high quality and strive for continuous improvement. We acknowledge the importance of a review of the current system, however we have some key areas of concern and submit the following in response to the draft. Where possible I have used the real life stories of our families as examples.

**Qualification requirements for educators working with children under 3 years.**

Springvale Service for Children embraced the change to higher ratios for children under three, prior to the implementation of the National Quality Framework. Our experiences have shown that the educators in the under 3 rooms set patterns for children’s learning, they must be responsive to children’s physical, emotional and developmental needs. While providing a nurturing environment is important, as it ensures a secure base for learning, there is so much more required to support children’s development.

Unfortunately, the current training course for a Diploma of Children’s Services barely equips educators with the necessary skills to provide optimal learning for children under three, or indeed for any children. The recommendation that a Certificate 3 educator(in Children’s Services) is adequately trained to educate the most vulnerable age group, with a qualification that can be gained in 6 weeks, with no centre based placement, is not acceptable. With research telling us that brain development is key in the first 6 years of life, it is essential that all children who are in education and care are attending programs that allow optimal learning at all ages.

It is the first three years of life in which any delays in children’s learning and development should be recognised in order to begin any necessary early intervention. Research tells us that early intervention is the key to maximizing children’s potential. Educators who are able to recognise the developmental norms of children are essential, these are not skills learnt in a 6 week certificate course. We currently have several children who have been diagnosed with additional needs, who have attended our early learning program since they were babies. It has been essential to their development that their additional needs were recognised in the two year old room and that resources have been put in place such as speech pathologists and psychologists.

Educating children can be a complex role, however when you look at research on the development of the brain in the first three years it is vital that we provide children with quality education in the early years.

**The National Early Childhood Technical Assistance Center** state:

Decades of rigorous research show that children’s earliest experiences play a critical role in **brain development**. The Center on the Developing Child at Harvard University has summarized this research:

Neural circuits, which create the foundation for learning, behavior and health, are most flexible or “plastic” during the **first three years** of life. Over time, they become increasingly difficult to change.

Persistent **“toxic” stress**, such as extreme poverty, abuse and neglect, or severe maternal depression can damage the developing brain, leading to lifelong problems in learning, behavior, and physical and mental health.

The brain is strengthened by **positive early experiences**, especially **stable relationships** with caring and responsive adults, safe and supportive environments, and appropriate nutrition.

Early social/ emotional development and physical health provide the foundation upon which **cognitive and language skills** develop.

High quality early intervention services can **change a child’s developmental trajectory** and improve outcomes for children, families, and communities.

Intervention is likely to be **more effective** and **less costly** when it is provided earlier in life rather than later.

This research clearly demonstrates why the role of the early childhood educator for children under the age of three needs to be highly qualified, not the most basically trained educators.

Why would we move backwards when we have worked so hard to ensure high quality staffing for our children?

**Removal of Pay Roll Tax Exceptions and Fringe Benefits Tax Exceptions for Not for Profit Providers**

Springvale Service for Children is a not for profit service and for these reasons we are vehemently opposed to the removal of payroll tax exemptions and fringe benefit tax exemption for not for profit providers. We are an integrated service and as such do our best to deliver a holistic approach to service delivery. As a service our fees are kept as low as possible whilst still trying to provide a service of excellence and provide addition services to families such as a toy library and facilitator led playgroups. Each year salaries for Springvale Service for Children are above $1 200 000, should additional costs occur due to the exceptions being removed, we could be adding an additional $40,000 in operational costs and this would need to be compensated by higher parent fees, potentially putting the access for quality education and care out of reach for not only vulnerable families that need it the most but also those families who have a medium level income.

I understand that there may be some inequities in comparison to privately run centres compared to not for profit services, but I would argue that there is a reason for these differences. Springvale Service for Children holds a waiting list of over 120 children in an area where nearly all the privately run centres have vacancies. We frequently get applicants for educator positions in our service telling us they want to work in a not for profit service as they are tired of working in services where any excess funds are taken as wages for the owners and not on key equipment for the children. Is it any wonder that families choose our centre over the privately run ones? One educator was recently confused by the ratio regulations as at her last privately run centre it had been acceptable to run understaffed, even encouraged as this cut down on staffing costs and raised profits.

I believe all services should run at a level of high quality and feel that if this was occurring the pressure would be taken off our service and give us some relief from our waiting list. Quality is not negotiable, and I cannot see that the removal of the pay roll tax exemption will make any difference to the playing field of childcare it will be purely put pressure on the not for profit services who are providing a quality service that generates any profits directly back to the education and care of the children.

**Special Childcare and Learning Subsidy.**

The Special Childcare Benefit has been essential for many vulnerable families in our centre to be able to access education and care when they are in most need of it, however few families would be able to access funds under the proposed changes.

These are just a few of our success stories, possibly due to the Special Childcare Benefit.

* The mother who spoke no English, had no family locally, a husband who was dying, whom she was caring for and an eight month old baby. She was unable to access childcare as she had no income. Through the support of maternal child health, our service and Special Child Care Benefits, this child attended our service for 6 months until the husband died. The mother said “God had sent us” as she had been drowning in her duties until her child was able to come to us. The Special Childcare Benefit was enough to ensure this mother felt able to manage her husband’s dying and death and her child safe and well cared for.
* The mother who had fled from another state when her abusive husband had been placed in gaol, relied on Special Childcare Benefits over a number of years while she physically and mentally healed. Once the father had gone to gaol this family was no longer deemed a child protection case, and would not be entitled to service, yet for 4 years, it was this mother’s attendance at our service that kept this mother functioning (in her own words). Our centre was not only a safe place for her children, but also for her.
* The family who required just 3 months assistance when the father lost his job, would not be eligible under the new system. The three months of Special Child care benefit allowed this father to attend interviews and training in order to obtain a new position. By the end of the three months the family were grateful for the centre’s support as the father was now regularly employed.

These are just three examples of many that demonstrate why a change to Special Childcare Benefits being “child protection” referrals would simply not work. Currently only children immediately and significantly at risk will be accepted as Child Protection cases so this considerably reduces the number of children that will be supported when they are at risk. If there is also no flexibility with those families who are not working receiving a combined CCR/CCB payment, how can we support mothers with post natal depression or families where a parent is temporarily out of work. We often support families where there is a child with additional needs, it may not be the child with needs who attends the centre but the family may need respite or time to attend medical appointments. There are families where there is illness, or trauma, how will these families be supported if they are not entitled to any benefit because they are not working?

Surely it is cost effective to support families when the difficulties first begin, not when the situation escalates and a solution is longer term and the solution becomes more difficult and costly to rectify? These families are then more likely to become families at risk, and will require Special Childcare Benefits, but in the more tragic situation of requiring Child Protection or Child First.

**Allowing services to temporarily operate with staffing levels below required ratios**

The introduction of the National Quality Framework has made vast improvements to the quality of care and education programs, so the recommendation that services can temporarily operate below the minimum requirements seems not only to be a backwards step but also puts children at risk.

This year there have been three serious incidents in our centre. As an Exceeding Service we do all we can to minimise the risk to children which includes maintaining staff child ratios and where possible providing extra educators above the minimum level required. In all of these situations, our educators could have done nothing to change the outcome, however had there been less than 3 staff in the room, the responses could have been very different. We provide programs that meet individual children’s needs, however the added risks that would occur due to a reduction in staffing are significant. We would simply not allow our service to run below ratio but I would be very concerned that services who are trying to cut costs would do so as an economic necessity.

**Removal of Preschools from the National Quality Framework.**

As an integrated service we work hard to ensure that the divide between care and education is reduced. Children in families where both parents work should not be penalised for this fact. We have four year olds who attend preschool with a qualified teacher in the long day program and we have children who attend sessional traditional preschool. The removal of preschools from the National Quality Framework will mean one group of children is a “rated service” while others will not and are not all children entitled to the same high level of quality?

For many teachers the move to the National Quality Framework has been a big shift, teachers in our centre have been forced to review programs that have not changed for many years. They have been forced to become reflective and to look at latest research. At Springvale Service for Children we would see the removal of the preschool from the assessment process to be a divide, and would again propel the expectations of education and care backwards. We need children in high quality early learning programs for a minimum of 15 hours to give them the greatest opportunity to reach their potential.

This is a time to move forward. We have the evidence to show that high quality care and education is needed for all children, regardless of age, gender, cultural background and socio-economic status. We must not take a step back! To reduce the number of kindergarten hours to 10 hour, to water down the National Quality Framework, to reduce subsidies and supports for families would all be a giant step back. We need to ensure that all children are provided with experiences of high quality which promote their healthy development, learning and wellbeing. Regardless of the outcome of the productivity commission Springvale Service for Children will endeavour never to reduce quality of the service offered to children, families and the wider community or on the quality of educators. We feel it would be morally wrong to penalise vulnerable families by raising fees in order to provide quality because the Productivity Commission deems the youngest members of our community and their families unworthy of expecting quality. This would simply not be good enough.

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Ref: http://www.nectac.org/~pdfs/pubs/importanceofearlyintervention.pdf