Castlemaine Childcare Cooperative is a parent owned not for profit organisation based in regional Victoria. The Coop runs 3 services under its umbrella – LDC for 60 children per day, FDC with educators situated within the town and in surrounding townships and an embedded funded kinder program, offering every child 15 contact hours with the degree qualified teacher plus a quality LDC program. We have been in operation for 30 years and have seen many changes to the practice and expectations of educators, parents and government in the field. Being not for profit has allowed us to offer high quality provision at an affordable price and we have a record of excellent staff retention, consistently high or exceeding rating under both QA rating systems. We support both in house training and student placements and have developed programs to improve outcomes for children with additional needs.

Up until this year, we have observed a steady process of increased recognition of the importance of early years educational programs in forming and resourcing a society where having a high percentage of well educated citizens involved in the workforce is essential to maintaining our standing in the world. There are a diminishing number of job opportunities for the uneducated and unskilled, who lead a second class existence, dependent on welfare and resented for being "leaners, not lifters" Studies here and overseas demonstrate that children from disadvantaged backgrounds may have already been irretrievably left behind in the education race by the time they start school (Sparling 2007) So it is of particular concern to us that the educational aspects of EC care and education are being sidelined, with the need to get women back to work being the only valued purpose of childcare. For many years our families have chosen our service because of good ratios and an excellent program. We get very positive feedback from local schools about our children as competent learners "You can always tell if a child has been at Castlemaine Childcare – they are so focussed and confident" was one comment from a prep teacher.

We submitted a long response to the initial request for submission, and would like to raise a few issues in response to the Draft Statement – it is a long document, and we hope we have given sufficient attention to the detail of what was obviously a complicated analysis and consideration of many competing points of view.

Overall we feel that there are some good (and in the case of subsidies, long overdue) recommendations. There are some suggestions that we are not sure of and lastly some that we would recommend be rejected entirely as we feel that any benefit they may offer to parents, providers and the future wellbeing of Australia is far far outweighed by the potentially detrimental effects that will ensue.

Overview:

Good points

- Streamlining CCB/CCR and JFA this is a very opaque system and most parents really don't know how much they get. Often parents think that childcare is costing more than it is because the CCR arrives unannounced into their account and doesn't occur at point of sale, so they don't factor it into their thinking. JFA has always been a problem and many parents don't even understand their eligibility.
- 2. Maintaining 15 hours of funded kindergarten there has been a long drawn out process to get all states and territories to implement the 15 hours program. The benefit is now acknowledged by nearly all recognised authorities and supported by international evidence based research. The tricky bit seems to be down to the squabble about whether any money can be expected from federal government. We would like the commission to clearly state where they see the responsibility for funding to sit.
- 3. The acknowledgement of the shared responsibility to support disadvantaged families both low income and the rural and remote.
- 4. Diverting some of the PPL funding into ECEC.
- 5. National WWCC
- 6. NQF to cover all government assisted services
- 7. Revamp the assessment rating system and getting rid of the Excellent rating process which is too time consuming and expensive for small services to contemplate.

Not sure

- 1. Nannies and grandparent in home care this could be good if really well monitored, with stringent guidelines such as Cert III qualification, safety monitoring and focus on child care and education and not housework. FDC services could be utilised to monitor
- 2. A degree of flexibility around staffing levels in an emergency or for rural and remote services. But needs to be monitored or private services may use it to increase profits at the cost of quality and staff and child wellbeing.

Bad

- 1. Abolition of exemption from payroll tax for NFP centres (FBT to a lesser extent as we can't really offer much in the salary sacrifice department, not being benevolent) This would cost us \$50 000 per year which would either result in a fee increase of \$3.00/day or we would have to reduce the quality of the staff only hiring the lowest qualified that we could legally get away with. Private providers feel entitled to increase fees more if NFPs have to put their fees up, so this action would put upward pressure on costs for parents. This change would result in no benefit to children, far less to parents, who would be the ultimate losers. The money collected would go into state coffers and would be unlikely to benefit ECEC in any way. This seems to be just a sop to disgruntled for profit providers who see it as a threat to their personal finances.
- 2. Removing the qualification requirement for under 3s this is an amazingly backward step. In our centre we have our most highly qualified and experienced staff in the baby room, as the undereducated and experienced are not able to give the high quality of care education and nurture our tiniest people need. Parents also seek the assurance that their preverbal and vulnerable children are being given high quality care, individual attention and a developmental program delivered by educators and not just being minded by babysitters (even if they are nice ladies). Comparisons to FDC are irrelevant their set up (small groups and limited numbers of families using the service) and responsibilities are different to this in charge of under 3 rooms in LDC. Diploma qualified staff in LDC are usually in charge of a team of educators with a range of skills and experience, and may have to deal with many families and children with complex needs.
- 3. Excluding Preschools from the NQF presumably to reassert the difference between care and education so that the requirements for simple childcare can be watered down and less money spent on wages. This would be another retrograde step and could reduce the quality of our early childhood provision to a level even lower than that found in the US.
- 4. Any suggestion that the NQF be "watered down" At this time, the first cycle of assessments for all services has not been completed; only when this is finished should there be reviews of the process and at that point, the objective of any review should be focused on ensuring a fair and transparent process that achieves quality assurance for all stakeholders.
- 5. A general observation about the tenor and underlying assumptions in the report the devaluing of the professionalism of early childhood educators is everywhere evident. Educators are referred to as carers as if this is all that is needed or expected and the current government's aim to not have to use taxpayer dollars for more or less anything means that "Reform" is equated with money saving. ECEC personnel are already poorly paid and a further diminution of the requirements and conditions will inevitably lead to an exodus from the industry of the most capable staff, leaving only the unmotivated and unskilled behind.

Overall, we appreciate the aim of the commission to examine the ECEC service provision with open eyes and a dispassionate approach. However we feel that it is important that the long term needs of and benefit to the country and individual families are the overriding consideration and not the short term demand for ways to save money now. Short term gain for long term pain has never been a sensible policy.