

**The Australian College of Educators**

**Submission to:**

The Productivity Commission Draft Report on Childcare and Early Childhood Learning

**Introduction**

The Australian College of Educators welcomes the opportunity to follow up our initial submission to the inquiry by responding to the draft report. The Australian College of Educators represents educators from those involved in Early Childhood Education through to those in Universities and Vocational Education. College membership also goes across Government, Catholic and Independent sectors and it has over fifty years’ experience in supporting high quality and equitable education for all.

As a general comment on the report, while it is admirable that it covered such a wide range of aspects its length and complexity has made a considered response in the time frame presented difficult, and it the commission should provide opportunities for further input before a final report is prepare. Particular areas where this could be done, and where the College could make a contribution, are indicated below. The College sees particular sections, in particular Section 5 Childhood learning and development to be worth further exploration, and would be willing to contribute to this.

We see Early Childhood Education as developing into a particularly important area in the contemporary world where working parents are increasingly relying on outside organisations to provide education and care for their very young children, while at the same time there is a growing awareness of how crucial the early years of life have on the social, emotional and intellectual development.

 ***Care, education, social and emotional development cannot be separated. As educators who work at all levels we recognise the important role early education plays in success at later stages in a child’s education.***

***The College welcomes the fact that that in general the report recognises the value of the National Quality Framework. As time goes on initial concerns about the difficulties of implementation are receding as centres are becoming more accustomed to meeting its requirements.***

***However the College sees the present Quality Framework as a minimum, and maintains that there should be a long term strategy to further increase the qualifications of those in this area, as well as the salaries commensurate with these qualifications***.

**The College approach to this submission**

The focus will be on the educational issues covered in this report, but using ‘education’ in terms of holistic well-being, encompassing intellectual, emotional, social and physical development. Issues of funding, except where the College perceives there are equity or quality issues involved, will be left to those better qualified in these areas.

We will follow the headings as in the draft report.

**Families using mainstream services — improving the accessibility, flexibility and affordability**

The College feels that these are generally well thought out measures ensuring equitable access to childcare.

However we have concerns regarding Recommendations 8.5 and 8.7. There are many difficulties with a Government being involved in this area and these provisions would compete with Family Day Care (FDC) schemes. The FDC sector has increased significantly in capacity since the NQF was introduced and it would be unfortunate to undermine this in any way,

**Additional needs children and services — improving the accessibility, flexibility and affordability**

The College believes that the commission has done an excellent job in this area, both in its research and its recommendations.

In regard to Recommendation 5.2 the College would recommend research of integrated service models that currently exist within communities such as Early Childhood Hubs.

**Preschool — supporting universal access**

While there is value in forming links between Preschools and primary schools and co-locating the two, and while we support universal access there are dangers in removing Preschools from the Early Childhood Framework as their identity and role could be subsumed by the formal education sector.

**Outside school hours care — improving the accessibility, flexibility and affordability**

With regard to Recommendation 7.4 the College does not see any value in undoing the progress that has been made in this area as the NQF has been implemented. An implication of 7.4, which we reject, is that no particular qualifications are necessary for this role.

**Removal of ECEC assistance to some providers**

With regard to Recommendation 10.1, the Not for Profit Sector has played a vital role in providing ECEC and should continue to be supported by tax exemptions.

**Workforce participation**

The College strongly supports Recommendation 6.1

**Quality assurance processes and regulation of ECEC**

In general, while the College has no problems with introducing efficiencies this should not involve any weakening of the NQF.

The College is strongly opposed to Recommendation 7.2 reducing the necessary qualifications for educators working in the birth to 36 months area. Where children of this age are absent for periods from their parents, specialist training is even more important, as mental and emotional development in this period is a strong determinant of their future.

The College strongly supports Recommendation 11.1 regarding oversight of Registered Training organisations to ensure consistently high standards of delivery of ECEC-related training.

**Ongoing support for evaluation and program assessment**

The College believes that this is crucial to the success of ECEC and with its cross sectoral composition is in a position to offer support for this process.