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Committee Secretary
Senate Education and Employment Committees
PO Box 6100
Parliament House
Canberra ACT 2600

By email: eec.sen@aph.gov.au

FAO: Senator Chris Back, Chair

Dear Senator Back,

Senate Education and Employment Reference Committee - The delivery of quality and affordable early childhood education and care services

The City of Sydney (The City) is pleased to have the opportunity to contribute to the Senate's inquiry into the delivery of quality and affordable early childhood education and care services.

Quality and affordable early childhood education and care is a critical issue for the City's communities. The below submission provides information on the following key issues in line with the Committee's terms of reference:

- The City's involvement in early childhood education and care;
- Why early education and care provision is important to The City;
- Outcomes for children in early childhood education and care services including:
 - workforce factors such as stability, qualifications and wage rates,
 - quality regulation (including staff-to-child ratios),
 - participation and access to services
- Impacts of the announced government amendments to the NQF(National Quality Framework), and the outcomes for children and early childhood education and care services.

Our contribution is made in a spirit of collaboration and in recognition of the need for all levels of government to commit to addressing current issues.

Should you wish to speak with a Council officer about this submission, please contact Irene Fakas, Manager Child and Family Services on

Yours sincerely,

Monica Barone

city of villages

Chief Executive Officer

Introduction

We are pleased that this inquiry will address the delivery of quality and affordable early childhood education and care services. Childcare (early education and care) has been identified by the City of Sydney ('the City') as a critical issue impacting the social and economic wellbeing and development of our residents and workforce alike.

We recently commissioned a comprehensive study on supply and demand for Early Childhood Education and Care (ECEC) care places across the City, both current and forecast to 2031, including the impacts of relevant policy, population and sectoral trends.

A copy of this study can be downloaded from

<http://www.cityofsydney.nsw.gov.au/community/community-services/children>

The study revealed that there is a current estimated shortfall of 3,104 ECEC places in the City of Sydney local government area (LGA). This shortfall is projected to rise to 5,976 places by 2031 if substantial additional supply does not come forward.

The study makes a series of recommendations on effective strategies to facilitate delivery of additional childcare places to meet demand. It highlights the need for education and awareness-raising in the wider community on the current gap in childcare places; the importance of adequate childcare supply to community, and the need for all levels of government to play their part in enabling increased supply.

This study, along with previous similar studies commissioned by the City, have helped build an extensive body of knowledge about childcare issues facing our communities, and opportunities for government to better respond to these issues.

This submission responds to some of the terms of reference of the Senate Inquiry, but not all. The City of Sydney has chosen to respond to those areas where we have direct experience and knowledge only. We do not know for example, what resident parents' experiences of the outcomes of the NQF are. Our submission focuses on:

- The City's involvement in early childhood education and care;
- Why early education and care provision is important to the City of Sydney;
- Outcomes for children in early childhood education and care services including:
 - workforce factors such as stability, qualifications and wage rates,
 - quality regulation (including staff-to-child ratios),
 - participation and access to services
- Impacts of the announced government amendments to the NQF, and the outcomes for children and early childhood education and care services.

The City welcomes the opportunity to contribute to the Senate's inquiry the delivery of quality and affordable early childhood education and care services.

Our contribution is made in a spirit of collaboration and in recognition of the need for all levels of government to commit to addressing current issues.

City of Sydney

The City of Sydney Council is the authority for the City of Sydney Local Government Area (LGA), NSW. The City comprises central Sydney (Sydney CBD), The Rocks, Millers Point, Ultimo, Pyrmont, Surry Hills, Woollahroomooloo, Kings Cross, Elizabeth Bay, Rushcutters Bay, Darlinghurst, Chippendale, Darlington, Camperdown, Forest Lodge, Glebe, Alexandria, Beaconsfield, Centennial Park, Erskineville, Newtown, Redfern, Rosebery, Waterloo, and Zetland.

More than 183,000 people live within the City of Sydney's boundaries, which cover 26.15sq.km, sharing the space with about 22,000 businesses. The median age of City

residents is 32. With an annual increase of about 1.5%, the City's population is forecast to reach approximately 269,000 by 2031 – more than double its 2001 population, with around 557,760 workers.

The City of Sydney is a global city and one of the most multicultural cities in the world: around 30% of residents speak a language other than English at home. The City is home to one of Sydney's largest Aboriginal and Torres Strait Islander communities. It is also economically diverse with higher than average numbers of both high income and low income households than Greater Sydney. Compared to more than 85% for the Sydney metropolitan area, only around 60% of City households own a car.

The City is central to the economic viability of NSW and Australia. In 2011-12, economic output in the City of Sydney was forecast to be \$100.8 billion. This represents 7% of the Australian economy and almost a quarter of the NSW economy.

Like all NSW councils, the City of Sydney has responsibilities and roles identified under the *Local Government Act of NSW 1993*. Amongst other roles, under this Act, local councils have the responsibility to plan for the needs of children. The City also has responsibilities under other NSW laws including the *Environmental Planning & Assessment Act 1979*, the *Public Health Act 2010* and the *Companion Animals Act 1998*. Council also has the authority to make its own regulations and by-laws.

The City of Sydney's functions include to:

- Provide for development in the local area;
- Provide for local services and facilities that benefit ratepayers, residents and visitors;
- Protect health and provide for the welfare, wellbeing and interests of the local community;
- Represent and promote the interests of ratepayers and residents;
- Establish and support organisations and programs targeting the local community;
- Protect the environment and improve local amenity;
- Attract and provide infrastructure for commerce, tourism and industry, and
- Manage, improve and develop resources available to Council.

The City's involvement in early childhood education and care

The City is making this submission in respect to our two major roles in ensuring our residents, those who work in our City, and above all our child residents have access to high quality education and care within our LGA.

These roles are that of:

- An active participant in moderating the demand/supply gap for early education and care in our City, and
- A direct provider of early education and care within our City.

For the City, ensuring that our community has access to high quality, affordable and accessible early education and care services is not just about maintaining a productive workforce or providing more child minding services. The City considers that quality and accessible early education and care has a fundamental educational role for children. It is a long term economically and socially sound investment in our community.

The City believes that participation in early education and care by local children and their families can make significant contributions to our LGA and broader society in a number of ways including:

- Closing the educational gap for children from disadvantaged backgrounds;
- Increasing academic outcomes for all children;
- Building stronger and safer and more connected neighbourhoods;
- Supporting workforce participation;
- Providing a current and future labour supply;
- Promoting the economic self-reliance of families, and
- Reducing poverty and addressing relative inequality.

Access to early education and care services is a target under the City's Community Strategic Plan – *Sustainable Sydney 2030*. This sets out a range of activities and targets, by which the City will support the ongoing development of vibrant and diverse local economies and communities.

Target 8 of this Plan specifically proposes:

“Every resident will be within reasonable walking distance to most local services including fresh food, childcare, health services and leisure, social, learning and cultural infrastructure.”

In addition, the City aspires to social sustainability goals of supporting increasing relative equality and the resilience and adaptive capacity of our communities. The supply of high quality early childhood education and care makes a critical contribution to achieving these objectives.

Historically, the City has been a strong advocate for quality early education and care and currently owns and/or leases premises from which 23 early education and care centres operate. These centres are either directly operated by the City, leased to not-for-profit providers under our Accommodation Grants Program (AGP) or leased commercially to for-profit providers. Specifically:

- The City owns and directly operates four early childhood education and care services: two preschools, one long day care centre and one occasional care centre. Council's occasional care services located in Redfern is the only occasional care service operating within the LGA. It has a strong focus on

access by local low- income and Aboriginal and Torres Strait Islander children and families.

- The City also provides five vacation care programs and six after school care programs.
- The City currently leases 16 centres under our Accommodation Grants Program (AGP) to a range of not-for-profit providers who deliver childcare services. The AGP supports community organisations by providing accommodation in Council-owned buildings within the community property portfolio at nil, or below market, rent. As part of the requirements of the AGP, these services must meet Key Performance Indicators detailed in their leases that support the City in meeting its objectives under *Sustainable Sydney 2030*. The AGP is a unique program and has benefits to both Council and the tenants due to maintaining formal leases which are reviewed every three years that are based on achieving identified community outcomes.
- The City leases two early education and care facilities under commercial leases to for-profit service operators.
- The City has contracted a community-based provider, Children's Services Community Management, to operate a long day care service for its employees in Chippendale. Employees of the City are able to access any one of the services the City directly operates, however only have first priority to childcare positions at the City's work-based education and care service. City employees have the opportunity to salary sacrifice their fees while using any of the council operated education and care services or the work based education and care centre.

The City also undertakes a number of planning and delivery roles that have contributed to an increase in the provision of early education and care places over the past ten years including:

- The City has completed three childcare needs analyses in 2005, 2008 and 2013 to identify provision priorities to enable effective planning for increased supply of quality and accessible early education and care for its residents and workers. These needs analyses included evidence based benchmarking based on the unique characteristics and needs of the local population.
- Based on the outcomes of the first analysis, the City introduced its first Childcare Centres Development Control Plan (DCP) in 2005.¹ Along with development quality guidelines for the provision of centres, the DCP set size thresholds for residential and commercial development at which the provision of childcare places is strongly encouraged. Since the introduction of the DCP, there have been an additional 1,310 childcare places provided across the City. Mostly these have been in high development areas such as the Sydney CBD and Green Square.
- The City has developed a comprehensive listing of all the education and care services operating within the LGA. This list is updated annually and is made available to families through the City of Sydney website. Families who contact

¹ The 2005 DCP is superseded by the integration of relevant guidelines into the City of Sydney DCP 2012.

the City's Child and Family services unit are given information about what parents should be looking for in an education and care centre to meet their specific needs.

- The City has committed to investing \$55 million to fast track the delivery of a number of new early education and care facilities across the City to respond to the identified growing gap in supply and working closely with the Education and Care Sector to increase supply of education and care services in areas of need.

Why early education and care provision is important to the City

In developing the National Quality Framework for Early Education and Care, the Council of Australian Governments (COAG) stated that:

“The Australian Government and state and territory governments recognise the importance of increasing their focus on the early years to ensure the wellbeing of children throughout their lives and to lift the productivity of our nation as a whole. The drive for change is based on clear evidence that the early years of a child’s life are very important for their present and future health, development and wellbeing.”

The City agrees with this sentiment. We have long recognised that participation in early education and care is important in our LGA to child residents, their families and to enable workforce participation by residents and others within the City. We consider the interests and rights of children, as residents of our city, to be central to the planning for, and in provision of, early education and care.

The City believes that access to quality education and care services is important for all children, given the evidence that exists of its importance to children both now, and in their future.

Outcomes for children in early childhood education and care services including workforce factors such as stability, qualifications and wage rates, quality regulation (including staff-to-child ratios), participation and access to services.

Support for the National Quality Framework

The City would like to place on record our support for the NQF. We believe that:

- the nationally consistent regulations;
- the rating system;
- the National Quality Standard; and particularly
- the improved educator child ratios; and
- improved qualification requirements for educators,

will lead to higher quality early education and care for children in our City.

The services we provide are already completely compliant with the NQF in terms of qualifications and ratios and will be able to be compliant with the 2016 ratio change.

These changes have been bought into place over a long period of time and we reject any suggestion of delaying the timeframes. Children deserve the best quality education and care available now.

As a provider, the City believes that the NQF and its associated regulatory environment has improved and will continue to improve the quality of education and care for children in our services.

We believe that the improved ratios and qualification requirements will have a beneficial impact on educators. Lower ratios benefit educators as well as children.

Although implementing some elements of the NQF has been at cost to the City as a service operator (provider), we believe the benefits will outweigh the costs in the long term.

The early education and care workforce

Recruitment

Quality of early education and care provision is dependent on the employment of a high quality and well qualified stable workforce. Workforce issues in the education and care sector hamper recruitment.

There is no doubt that the status, standing and wages of educators and early childhood teachers act as a deterrent to the recruitment and retention of educators in our services and in education and care services operated by other providers within the City.

Educators working in our services can rarely afford to live within the City where they work. High mortgages and rentals exclude educators from residence in the city because they cannot command the wages needed to pay for accommodation.

Sustainable wage increases in the early education and care sector can only come from either increased parent fees or through Commonwealth Government subsidy. Fees at early education and care services in the City LGA are amongst the highest in the country. Our families would be unable to face fee increases brought about by pay increases for educators and teachers. Needed increases must come via Commonwealth wage subsidies.

Quality and availability of suitable staff is currently a critical concern.

While there is an increase in education and care services provided across NSW it has been difficult to find high quality staff to work in services. Our recruitment experience indicates that the standard of applicants has reduced compared with a decade ago. Over the last few years, the City has at times needed to run three or four recruitment rounds – sometimes resulting in positions being vacant for up to a year – before finding suitable staff.

As the remuneration for early childhood teachers is lower than in the primary and secondary school systems and the working conditions are not as favourable as working in a primary school, attracting and retaining early childhood teachers is an ongoing issue.

Professional wages and better working conditions would assist in attracting a higher calibre of staff to the early childhood education and care sector. This is a critical issue for the Commonwealth Government to address at an award level, as well as through provision of funding to education and care service in paying professional wages to ensure that fees do not need to be increased considerably to cover the cost of increase in salaries.

The shortage of qualified teachers affects the capacity of existing teaching staff to leave their services for professional development, for personal leave, and to attend meetings. It is difficult to recruit casual teachers to enable permanent teachers release from their role. As the Regulation specifies the number of teachers who must be on site at any point in time (for the number of children on the premises) teachers are not able to leave the premises without breaching the Regulations. The lack of capacity to recruit casual teachers is generally thought to be because a casual teacher can command higher wages working in the Government or independent school sector in NSW than they can in an early education and care service.

Additionally, teachers who hold an international qualification and have migrated to Australia, with the intention of working in the Education sector, can wait up to 3 months for their qualifications to be assessed and recognised in Australia, which further exacerbates the situation.

Quality regulation

It has been repeatedly shown that regulation of early education and care services ensures improvement in service quality. Within the City's own services we are meeting existing ratios and are on track to meet changed ratios in 2016.

The City supports the improvements to ratios that were contained within the NQF as prerequisites to the provision of higher quality education and care.

Participation and access to services

Current early education and care provision in the City LGA

As at July 2013, there were 4,502 centre-based early education and care places available in 87 centres across the City and 195 Family Day Care places. Places for children aged under two years represented around 28% of all places (lower than the proportion of children aged under two years which is 44% of all children 0 to 5 years). There were approximately 7,113 children enrolled in these 4,502 centre-based places, indicating that a majority of children attend care part time – three days per week on average. This important finding has led the City to determine that when assessing demand, assessment should not be based on one place for one child.

Use of centres by residents and workers varies across the LGA. In CBD localities, around 90% of all places are utilised by the children of workers. In localities outside the CBD, around 40% of all places are accessed by children of workers.

For-profit and work-based corporate childcare represents 53% of all services operating in the City. This is an increase from 2005 when it was 36%.

Community-based not-for profit long day care services represent 30% of all early education and care centres (excluding preschools) down from 2005 when 38.5% of all early education and care centres in the local area were community based not for profit services.

Current supply/demand gap

The dynamics of childcare supply/demand in the City's LGA are different in comparison to many other LGAs. Early education and care centres are not only used by residents but also by workers in the City. Therefore, demand cannot be assessed only on the number of preschool aged children living here.

The *Childcare Needs Analysis Study 2013*² identified a current gap of 1,470 places for residents and a forecast gap to 2031 of 3,730 places.³ The Study also identified a current gap of 1,634 places for workers and a forecast gap to 2031 of 2,246 places. The total current combined gap for residents and workers is 3,104 and forecast gap to 2031 is 5,976 places.

The City used multiple indicators to develop a benchmark to determine demand for its residents and workers. Assessing early education and care demand is not as simple as looking at the number of, or growth in child populations. Every LGA is different and demand needs to be assessed based on its attributes including: whether children live in one parent, two parent or no parent working households; the size of the local workforce; income and educational levels of parents and their capacity to access care; cultural norms around use of formal care; affordability and income levels; and ability to access quality care in the local area.

The benchmark used by the City for assessing resident demand was one place for every two children aged 0 to 5 years. This benchmark is based on the following assumptions from the evidence collected:

- Approximately 80% of all of the City's children need access to centre based care (based on the survey of 150 residents and consistent with findings from 2005 and 2008 and outcomes of the Australian Early Development Index 2012).
- Families need on average three days a week formal education and care (based on interviews with all ECEC services and a resident survey).
- Therefore, 80% of all children need access to care for on average three days a week – or 0.6 places a day: this equates to 0.48 places for one child or (rounded up) one place for every two children.

² Cred Community Planning and Community Childcare Co-operative (NSW) for the City of Sydney, *City of Sydney Childcare Needs Analysis 2013*

³ It is noted that the forecast figure is premised on current supply, as it is not possible to forecast supply beyond known Development Applications.

Benchmarks for workers were based on current utilisation rates in different Village Groups⁴ and applying this to the proportion of places utilised by workers in each Village Group – eg., 90% in the CBD, 40% in Village Groups outside the CBD.

Demand is not only high in terms of places but also in terms of equity. What is clear from the study is that Council services and not-for-profit services are providing much greater access to low-income, Aboriginal and Torres Strait Islander children, children with additional needs, and for children aged under two years.

For example, the proportion of children who receive full CCB (that is those receiving the full Child Care Benefit and on very low-incomes) was significantly lower in private centres (6.0%) than not-for-profit centres (16.2%) and City operated centres (25.5%). The proportion of Aboriginal and/or Torres Strait Islander children accessing care was much higher overall in Council operated centres (10.8%) and not-for-profit (community-based) (5.8%) compared to private centres (0.4%). A dependence on the private market to supply all future early education and care places could continue to disadvantage these children and families.

The various types of education and care services offered in the City of Sydney LGA appear to meet the needs of residents and workers in terms of flexibility. There is however a need for occasional care in the CBD that can be used by interstate visitors who require short term care. Unfortunately, as it is difficult for occasional care to operate as a viable service the private sector is not interested in operating such services. The City operates one occasional care centre (in Redfern) and one not for profit operator (in Glebe) that hold a portion of their daily positions for occasional care placements. The location of these services is not easily accessible to the interstate worker who requires care in the CBD.

Why is there an undersupply of early education and care places in the City's LGA?

There are a number of reasons why undersupply of early education and care places has occurred in the City:

- Significant resident and worker population growth.
 - Over the past decade the resident population has increased by 53,500 (41.5%) and comparatively the City has been both the largest and fastest growing local government area in the state of NSW. The total population of children aged 0 to 5 years has increased by 1,308 between 2006 and 2011 from 6,040 to 7,348 and is projected to increase significantly to 12,946 by 2031.
 - During 2006 to 2011, the City's workforce increased by 49,839 from 384,981 to 434,820.
- An increasing number of families are choosing to live in the City because of its proximity to work and transport. The corresponding higher cost of living means that both parents have to work and many require early education and care for their children from an early age, increasing demand for places for children under two years which are as babies placing a reliance on childcare from a very early age, even though places for children aged under two years are limited.
- Lack of co-ordinated planning at a state or national level and limited support for local government. There has been a lack of strategic planning for the adequate supply of early childhood education and care places to support the growing population and workforce at the State and Commonwealth Government levels.

⁴ The City's LGA is divided into 10 Village Groups for strategic social planning purposes, to support localised planning for facilities and services.

This has resulted in undersupply in some areas and an oversupply in some growth areas (eg Blacktown).

There has also been an overreliance on the private sector to meet the demand gap, even though the profitability of services is less feasible in very high land value areas, such as the City's LGA. This has resulted in a situation whereby despite the attractiveness of service development in areas of obvious high demand for places, the initial cost of entry can be high and ongoing profitability of services can be relatively low.

- The high costs of land and development, along with the difficulty of finding suitable sites large enough to meet regulated space requirements, are key constraints on supply in the City's LGA. Not only is land relatively more expensive in this LGA, but redevelopment of existing sites is also frequently constrained by additional factors, including heritage restrictions; the size of the site making it difficult to build a centre large enough to be profitable, and neighbour impacts associated with high densities and proximity to residential development.

The majority of early education and care centres built since 2005 have been built as part of new developments and 100% have been developed by the private sector. Because of the difficulties in the City of finding sites appropriate to meet the design requirements of the NQF, the City allows flexibility in centre design including around car parking spaces and locating centres above ground floor level, subject to appropriate emergency egress measures being in place.

Access by all

The Commonwealth needs to strengthen programs to ensure that children who traditionally miss out on places in early education and care services (such as children from low-income families, children with additional needs, children at risk, Aboriginal and Torres Strait Islander children and babies) get access. Because of the additional cost to providers of attracting and or including children from these groups in early education and care services, they are underrepresented in most services. Providers such as the City who have a commitment to equitable access to our services, include these children at a cost to the City. Babies cost more to provide early education and care to because of higher staff child ratios. Consequently our supply studies have always shown that there is a larger demand gap for this age group than for any other. The Inclusion Support Subsidy does not cover the full cost of additional workers needed to include children with additional needs in long day care services. The City of Sydney believes that Aboriginal and Torres Strait Islander Children and children at risk of harm should be guaranteed early education and care positions at a nominal cost.

Children from low-income families, children with additional needs, children at risk and Aboriginal and Torres Strait Islander children are the children who would most benefit from access to high quality early education and care throughout their entire childhood. Unless the Commonwealth takes specific actions to address the inequity of access they face, they will continue to be excluded.

The City is committed to ensuring Aboriginal and Torres Strait Islander children and children at risk get access to early education, but complex and bureaucratic fee subsidy structures such as Child Care Benefit and Child Care Rebate lead to both of these groups missing out.

As a provider, we need more and better designed programs and subsidies to ensure that children who are likely to miss out can get access to services.

Environments for Learning:

The City operates four education and care services directly.

In the lead up to implementation of the NQF the City Child undertook an analysis of:

- How many new staff would be required and the cost involved in employing additional staff;
- What additional support/ resources would be required to implement the requirements of the educational program into each setting and the cost involved in resourcing through training and time; and
- What skills and qualifications current staff had; what training and assessment would be required in the future and how this would be procured

To implement the regulatory changes, the City:

- Organised for untrained educators to acquire needed qualifications through recognition of prior learning or coursework pathways;
- Identified that additional time off the floor for key staff would be required to document and plan the educational program in line with the Early Years Learning Framework. Each staff member who plans and documents the program is now given approximately three to four hours per week to develop the program; and
- Employed additional staff to meet ratios and to ensure coverage of staff in those rooms for breaks and staff programming.

The cost involved in the implementation of the changes listed was considerable. The cost was allocated across two financial years and was partly subsidised by the City and partially covered through an increase in fees. To date, the total cost of implementing the requirements under the National Quality Framework has amounted to \$247,440. Initially, \$86,940 was required to increase staffing to cover the new ratios. Since July 2011, 5 x Unqualified Child Care Worker positions (min Cert III in Children's Services) have been converted to Trained Child care Worker positions (Diploma in Children's Services) at a total cost of \$38,600 to meet the qualification requirements of the National Quality Framework. To ensure that educators have the time to develop and document an educational program that meets the requirements of the Early Years Learning Framework, \$60,950 per annum, is allocated to release educators from face to face teaching.

The employment of additional and more highly qualified staff and the additional resources given to staff in the way of time off the floor and training has had a positive impact on the education and care delivered at the services. This has been evident in the feedback that the City has received from families, the children themselves and the spot visits which the NSW Department of Education and Communities has undertaken.

No City operated centre has yet been through the assessment and ratings process of the NQF, however the City is confident that the centres will be able to achieve positive results.

Impacts of the announced government amendments to the NQF, and the outcomes for children and early childhood education and care services.

The City is aware of changes announced by the Government to the NQF in December last year including⁵:

- Streamlining of the assessment and ratings process to speed up processing times for states and territories including possible simplifying of the National Quality Standard;
- Possible removal of the requirement for service supervisors to have formal Supervisor Certificates;
- Flexibility on ratios during short term absences due to sickness; and
- improved recognition for staff studying a relevant early childhood degree.

The City supports the NQF, and in particular the changes to the ratios and qualification requirements which we believe will deliver better quality of education and care to children.

We are reluctant to see changes brought in to relax ratios during short term absences or change as to who is currently recognised as an early childhood teacher.

A recent study by the University of Melbourne⁶ has shown that participation in early education in the year prior to formal schooling shows that children who accessed a preschool education scored 15–20 points higher than those who didn't on Year 3 National Assessment Program – Literacy and Numeracy (NAPLAN) scores, but only when that early education was delivered by a qualified early childhood teacher.

We believe that weakening the requirement for the employment of early childhood teachers would thus impact negatively on the outcomes for children.

Likewise 'flexibility on ratios' is not something that the City would support. We believe that improved ratios are better for children and educators. A wide range of research backs up this view. Allowing flexibility makes it harder to regulate and to check for compliance.

The City believes however that there could be benefits in removal of the requirement for Supervisor Certification. This is a requirement that adds little in terms of real quality improvement to children, and thus should be assessed on a cost/benefits basis.

Finally, given that the National Quality Standard has only been in place for two years, the City recommends that there are benefits in not changing it at the moment. As a provider we have instituted policy and practice changes to meet the existing elements and standards of the NQS, as well as ensuring educators have been trained to understand the requirements of the NQS.

⁵ <http://ministers.education.gov.au/ley/child-care-gets-red-tape-relief>

⁶ <http://www.education.vic.gov.au/Documents/about/research/preschoolparticipationandqualisummarypaper2013.pdf>