

# SUBMISSION TO SENATE EDUCATION, EMPLOYMENT AND WORKPLACE RELATIONS COMMITTEE

## INQUIRY INTO THE PROVISION OF CHILDCARE

**Please complete and submit this form with your submission to:**

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**INDEPENDENT EDUCATION UNION OF AUSTRALIA**  
**SUBMISSION TO SENATE EDUCATION, EMPLOYMENT AND WORKPLACE  
RELATIONS COMMITTEE**

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January 2009

**Introduction**

The IEUA is the federally registered union representing over 65,000 education professionals (teachers and other education staff) in the non-government education sector.

Existing across the early childhood education and care sector are generally two types of governance structures – those early childhood education centres which are corporately owned and run for profit and those ‘not for profit’ preschool, long day care centres, community crèche and kindergarten centres.

Members of the Independent Education Union are employed in the following early childhood education and care settings:

(a) Long day care centres - These centres are open for eight or more hours per day and usually operate 48 to 51 weeks of the year. They cater for children from 0 to 5 years, although some centres do not take children under two years. The centres usually provide full-time and part-time care with a few of the licensed places reserved for emergencies. Centres may be either commercially operated, non-profit or not for profit community based.

In NSW, all services are required to provide an educational program for children. However, not all centres employ qualified early childhood teachers.

(b) Pre-school centres and community kindergartens - These centres cater for children 3 to 5 years (before they go to school) and usually operate on hours and terms similar to schools. In particular, Queensland’s community kindergarten centres cater for children from the ages of 3.5 years to 4.5 years, prior to entering Prep school at the age of 4.5 years. Though, where the need arises, Queensland community kindergartens may enrol children from the age of 3 years.

It is essential to note that the delivery of an educational programme is the *raison d’etre* of community kindergartens and pre schools.

The vast majority of these centres are community based and in receipt of subsidies from the State Government although there are a few private (profit-making) preschools.

(c) Prep Schools in Queensland are early childhood centres attached to schools and are universally available, while not mandatory, to children from the age of 4.5 to 5.5 years. Likewise, while it has not been mandatory for Prep Schools to employ early childhood education specialist trained teachers, the majority of Prep Schools have done so, thus acknowledging the importance of appropriately qualified staff in the delivery of quality early childhood education.

(d) Early learning centres in Victoria are centres attached to independent schools and operate usually within the resources of the primary school. These centres conduct kindergarten programmes and cater for 3 – 4 year olds. Programmes run from two to five days on similar hours to schools, depending on the age of the child. Fees are charged at equivalent rates to school fees.

(e) Other centres such as early intervention centres (providing care for special needs children at early childhood centres or in children's homes) and multipurpose services or “hubs” which provide a variety of services for families on the one premises.

The IEUA is responsible for negotiating many of the awards and collective agreements for members in these various early childhood education and care settings. The processes and outcomes of these negotiations as well as the experiences of our members have strongly formed the basis for our views regarding this sector.

In responding to the Senate inquiry, the IEUA has drawn upon the experiences of IEUA members in Queensland, New South Wales and Victoria as qualified practitioners in the delivery of early childhood education and care.

The IEUA has made submissions to the current Government’s Productivity Agenda Working Group regarding early childhood education. These include;

- Submission to Productivity Agenda Working Group, Education, Skills, Training and Early Childhood Development – A National Quality Framework For Early Childhood Education and Care. (September 2008);and
- Submission to Productivity Agenda Working Group, Education, Skills, Training and Early Childhood Development – Early Years Learning Framework. (December 2008).

**The IEUA notes the term “early childhood education and care” as the term adopted by the OECD to appropriately emphasise the inseparable nature of care and education of young children and thus we have deliberately utilised this reference throughout the submission.**

## Terms of reference

A. *The financial, social and industry impact of the ABC Learning collapse on the provision of child care in Australia.*

(i) **The dangers of monopoly of supply of child care to the community.**

**The IEUA considers the extent of coverage of child care services by ABC learning as one of the most significant issues when considering the collapse of the company.**

Since listing on the Australian Stock Exchange in 2001, ABC Learning undertook an aggressive growth strategy. From a small child care provider, albeit Australia's largest with 18 centres in 1997, the company was set on rapid growth in terms of number of child care centres, number of child care places, revenues, profit and market capitalisation.

At the end of the financial year 2002, ABC Learning offered almost 8 000 childcare places in approximately 43 centres<sup>1</sup>. By November 2005, child care places on offer had jumped to 47 500 places in 697 centres<sup>2</sup>.

The biggest acquisition had been that of rival Peppercorns in 2004, which provided to ABC Learning 450 centres.<sup>3</sup>

At the time of collapse, ABC Learning conducted business for approximately 1084 centres, catering for nearly 100 000 children.

Thus, ABC Learning represented the largest provider of long term day care for Australian preschoolers, operating nearly 25 percent of all places.<sup>4</sup>

**The monopolistic provision of childcare is highly problematic when considering the delivery of choice and quality of early childhood education and care.**

While internationally, other countries have a high proportion of commercial childcare services, Australia has been the only country where such a monopoly existed.

It is recognised that the Commonwealth Government's 1990 decision to offer operational childcare benefits to all parents including those using for profit services, under the guise of a free market system in which parents could choose where they wish to spend the subsidy, was intended to increase competition and lower prices. Attached to this decision was the requirement that all services become accredited. The accreditation system was sought to improve quality of the service.

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<sup>1</sup> (ABC Learning 2002).

<sup>2</sup> ABC Learning 2005a)

<sup>3</sup> ABC Learning 2004

<sup>4</sup> Rush E & Downie C, (2006) p vii

However, the reality of the current situation demonstrates that these decisions resulted in fewer choices for parents.

In recent years, more and more individually owned services had been bought by ABC Learning and the share of the market run by small owner operators declined.

The reality for many parents became that their options were reduced as many small owner operators sold out to ABC Learning. In many small communities the only option for parents was an ABC Learning centre.

For IEUA members, transition of business from small providers to corporate chain left some with less comparable working conditions, fewer resources for the education of children, and lower staff morale.

The objectives of the Board of ABC Learning in achieving the monopoly of market is clearly articulated within the Annual Report of 2003:

*“The board expects that the above developments will provide a wider market penetration and enable the group’s activity to be expanded by up to 50 percent. This will in term lead to substantially increased profitability.”<sup>5</sup>*

**The IEUA believes that the aggressive nature of corporate chains buying out private and non-profit operators, in addition to establishing new services (a significant number in proximity to one another) has led to unsatisfactory and limited levels of choice of service for parents.**

**(ii) Shareholder interests vs quality early childhood education and care**

The IEUA acknowledges the existence of the private sector in meeting demand for child care and as an employer of early childhood teachers.

**However, the IEUA also recognises serious problems caused by the competing interests of shareholders and children.**

Publically listed corporations carry a duty to shareholders to maximise profits and this inevitably implies cost savings to the quality of education and care provided to children.

In regards to ABC Learning, the objectives of the company support this. As stated in the ABC Learning annual reports, the board of directors “*must act in the best interests of the company as a whole*” with their main tasks being to “*drive the performance of the Company*”<sup>6</sup>.

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<sup>5</sup> ABC Learning Annual Report 2003

<sup>6</sup> *ibid*

The profitability of corporations is in conflict with those conditions that have been linked to positive outcomes for children, including high staff-child ratios, quality regulation and qualified staff<sup>7</sup>. The highest cost in children's service is the cost of labour.

The casualisation of staff, the reduction of staff hours and the reduction of the adult to child ratios which occurred in the lead up to the various closures and still remains in existence in some centres, is a prime example of how reduction of costs in the pursuit of profit viability can affect the quality of outcomes.

### **(iii) Domino effect of closure**

The closure of many ABC Learning and CFK Child Care Centres has put additional pressure on other existing services to meet demand.

IEUA members have reported on the difficulties in obtaining placement for their children within either not for profit centres or other ABC Learning centres.

In one particular instance, an IEUA member, parent of twins whose ABC Learning childcare centre was closed, has reported that she was unable to locate places for both twins in the same centre. She reported that she was only able to locate placement for the twins in different centres and on different days. She has informed the IEUA branch that she will not be returning to work in 2009.

The demand upon the not for profit providers to "fill the gap" has been overwhelming.

**The IEUA believes that support must be provided to the non-profit providers to meet this need. Interest-free loans and capital grants would assist non-profit organisations to increase places in their existing services and to take over failing ABC learning centres.**

Unless such support is provided to non-profit providers, families will continue to experience the lack of available quality early childhood education and care as a barrier to workforce participation. Families may need to reduce the number of hours spent in the paid workforce or may be forced to increasingly turn to informal types of care, which are less regulated and conducted primarily by unqualified staff.

### **(iv) Effect of closure on staff**

IEUA members have reported a high level of anxiety and confusion regarding the closures or anticipated closures of ABC Learning centres.

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<sup>7</sup> Wangmann, J (1995), pp. 75-78.

Communication to staff from ABC Learning head office has been confusing and in some cases misleading and has caused anxiety to staff who were considering their future options of employment.

In some instances in NSW, a number of members were not offered alternative employment and some were provided with unsatisfactorily short notice periods prior to closure.

Many staff were told after attending work that they could go home as there was insufficient work for them for the day. Such staff have suffered economic hardships as they did not have a regular weekly wage.

In addition to this, staff have been casualised and not provided with regular hours of work.

Others were denied access to annual and long service leave. Such cases were challenged and rectified by the Union.

According to our members, in addition to the loss of employment, many centres were forced to reduce staff to children ratios, cut back on resource and equipment purchase and reduce hours of a significant number of part time staff. Such decisions have serious consequences for the quality of education and care provided to children in the centre and to the well being of the remaining staff.

### ***Terms of Reference***

#### ***B. Alternative options and models for the provision of childcare***

Public investment in early childhood education and care is essential because of the positive impacts on the health and well-being of the children who access these services.

Good quality early childhood education and care is a powerful component of prevention and early intervention strategies as it operates to address the risks to a child's development on a number of levels.

Cognitive, linguistic, emotional and social development can be enhanced for children from Indigenous and culturally and linguistically diverse families. Quality child care can help with integration and language skills, and reduce disadvantage on entry into formal education system<sup>8</sup>.

As well, the early childhood education and care sector facilitates parental workforce participation. Early childhood education and care can erode one of the last great obstacles to equality of opportunity and help parents reconcile the competing demands of income earning and family.

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<sup>8</sup> UNICEF, Report card 8, 2008, p 17

Importantly, for national economies, the availability of child care that allows parents to return to work can increase GDP and public revenue.

In Australia, early childhood education and care has been divided into two largely separate systems. Child “care” delivered in child care centres and home based centres and early “education” delivered in preschools and kindergartens.

The different levels and types of staffing in childcare and preschools and kindergartens illustrate the division most widely. Most preschools and kindergartens have qualified early childhood teachers while only about 8% of staff in child care centres have an early childhood degree level qualification.<sup>9</sup>

There are also significant discrepancies between the wages and the conditions of qualified early childhood teachers working in childcare centres compared to kindergartens and preschools and schools.

Less favourable employment conditions work against attracting and retaining well trained, appropriately qualified and competent teachers and teacher assistants/childcare workers.

IEUA members are reporting that they are choosing to work in either school or pre-school, kindergarten settings due to the better salary and working conditions. In particular, university graduates are informing our Union that they intend to work in schools rather than childcare settings due to the better conditions.

The inequity which exists in salary and working conditions across the two sectors is disadvantaging staff and the children in their care.

A further example of the divide between early childhood education and care exists in Victoria where a growing trend in independent schools to establish “early learning centres” exists .

These centres are usually well resourced as they share the resources of the primary school and employ qualified early childhood education teachers on the same rates of pay and conditions as primary teachers through union certified agreements.

Private school fees are charged. The centres can cater for 3 year old children up to three days a week and 4 year old children up to 5 days a week and offer sophisticated and structured kindergarten and early learning programmes.

These centres are highly sought after by working parents who prefer the centres over formal/informal childcare which, it is perceived, lacks the structured early learning programme component and community run kindergartens, which offer limited sessional times and are inadequately funded by both state and federal governments.

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<sup>9</sup> Elliot, A, (2004) p9



This system is creating a divide between the “haves” and “have nots”, particularly in the Melbourne metropolitan region.

**The IEUA believes that it is the dual system of childcare and preschool/kindergarten education and the associated issues of differential working conditions, quality and outcomes for children that is the biggest challenge that must be overcome by the development of any future policies.**

**The IEUA believes that the terms and conditions of employment for teachers employed in early childhood education and care must be comparable to the terms and conditions in other educational settings in order to overcome staff shortages and education and care quality issues.**

To fail to do so, would entrench both the inequity for teachers and for the children in their care.

### **International approach**

The IEUA recognises that in countries such as Denmark, Finland, Norway and Sweden, the prevailing view of early childhood education is that the earliest years of life are critical opportunity not only for the development of cognitive and linguistic skills but also for the social skills and development of emotions, needs and rights of others.<sup>10</sup>

Thus the planning of early childhood education and care encompasses support for parents and children from birth, including paid parental leave, through to specialist training of early childhood education staff and the development of curricula.

In these societies, early childhood education and care is seen as an investment, not just for success at school, but in society and citizenship.

### **State Government Initiatives**

**The IEUA recognises the current work undertaken by the Queensland Department of Communities through the Queensland Early Years Strategy as a mechanism of an integrated education and care service for parents.**

This strategy focuses on children from the antenatal period to 8 years of age and aims to build upon existing child and family support services, promote greater service integration and increase the focus on prevention and early intervention.<sup>11</sup>

Childcare and family support hubs have been developed to bring together a range of support services for young children and their families, with early childhood education and care forming the core of each hub. As the mix of services and operational

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<sup>10</sup> UNICEF Report card 8, (2008), p 17

<sup>11</sup> Snapshot, (2008), p 82

mechanisms are determined by local community members, each hub is unique. Some are one-stop shops for service provision, while others link existing or planned services that operate from a variety of locations. Of the 24 Hubs existing in Queensland, 19 are in rural, remote or regional areas of the state.

The IEUA also recognises the ongoing work of the Victoria Government, through the childcare taskforce in the exploration of integration of early childhood education and care for parents.

**The IEUA recommends that, in developing an alternative model for the support of early childhood education and care, a more holistic approach is taken to integrate structures and policies which support parents from the birth of their child through:**

- **Legislated paid parental leave and family friendly work provisions;**
- **The recruitment and retention of early childhood education specialist trained teachers;**
- **Working conditions and teacher salaries which are comparable to other educational sectors;**
- **Early childhood education and care subsidies and income tax support; and**
- **Appropriate and adequate recurrent and capital funding to providers.**

A comprehensive system that gives parents a real choice about the education and care of their children is needed.

### **Terms of Reference**

#### ***C (i) The role of government at all levels in funding for community, not for profit and independent service providers***

Issues concerning the quality of education and care for young children are inseparable from the way in which services are funded.

Government funding for early childhood services can occur in several ways. Currently the federal government funding is only through direct subsidies to parents. State Government funding may be through operational recurrent or capital funding, the direct delivery of services, funding to parents or funding tied to specific purposes such for children with special needs.

Funding of early childhood education and care in Australia is at lower levels compared to other OECD nations<sup>12</sup>.

While the COAG reforms will increase the proportion of funding to the respective States and Territories, a significant commitment to increase funding toward early childhood education and care is still necessary from the Federal Government.

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<sup>12</sup> UNICEF Report Card 8, (2008) p 20

**IEUA believes that there is a strong case for increasing investment into the quality and availability of early childhood education and care programs, both as an effective approach to supporting children and families and as a way to equip children with the future life and learning skills.**

**(a) Funding for centres**

**Recurrent funding**

Currently in Queensland, both recurrent funding and capital assistance to community kindergartens is available through the Department of Education Community Kindergarten Assistance Scheme (DECKAS).

However, a new model of funding is being considered to fund access to kindergarten programs for all 3.5 and 4.5 year olds and a selection of child care centres that engage a qualified teacher to deliver an education program.

Following a review into DECKAS funding, a reference group comprising of the various early childhood education and care stakeholders, including the Queensland Independent Education Union, has been established to consider the aspects of the funding model and the delivery of education and care.

However, despite the development of a new funding model, both IEUA members and parents at the community kindergartens have been supportive of the general principle underpinning DECKAS funding and have sought for similar to continue.

Recurrent funding in Queensland provides approximately 80 percent of approved staff costs for a teacher/director and an assistant employed for each community kindergarten unit and is based on the following:

- The appropriate award/collective agreement salaries of the teacher /director of each kindergarten unit
- The appropriate award/collective agreement salaries for an assistant
- Other staff costs payable under the collective agreement including:
  - Compulsory occupational superannuation
  - District and locality allowance
  - Holiday leave loading of 17.5% on 4 weeks
  - Voluntary superannuation payment from 1 October 2006 as prescribed by the collective agreement

The maximum funded hours per week for which payment is made are 37.5 hours for teachers and 35 hours for assistants if the unit operates 22.5 to a maximum of 27.5 teacher/child contact hours per week. If the unit operates for less than 22.5 teacher/child contact hours, funding is provided on a pro-rata basis.

IEUA members in Queensland have reported that community kindergarten committees believe that as the funding formula secures funding for qualified early childhood education teachers, the committee is able to select a teacher on the basis on quality and experience, not cost.

Further, IEUA members have sought in the review into DECKAS that the funding model be increased to provide 100% of staff costs, particularly in regional areas.

While funding is available for salaries in Queensland, there is no adequate funding arrangement in place for preschools in NSW *and Victoria*.

In NSW, funding has not increased significantly for preschools for a number of years. Currently a new funding model is being implemented. However, this has been without significant increase. It will mean that a number of services will lose funding and this will effect particularly low socio-economic areas where there has not been full utilisation of the service because of the cost to parents. Preschool costs in NSW average about \$40 per day. Minimum assistance is available to parents.

The Preschool Investment & Reform Plan is inadequate in terms of financial investment, involves an extremely complicated and detailed application process and lacks transparency in terms of allocation of funding. The Federal Government should support services by way of subsidies for salaries .

### **Capital grants to centres**

In addition, capital assistance must be made available to assist not only in the maintenance of appropriate building and equipment standards but also the further development and improvement of equipment.

This form of assistance is currently extremely inadequate and is provided on a sporadic basis through DoCS in NSW. Many services have not been renovated since they were constructed in the early seventies. By contrast, DECKAS capital provides 50% of the costs of an approved project up to a maximum of \$50,000 for any one year to successful applicants in Queensland.

In Victoria, local government is a key player in the childcare sector. Local government may either be responsible as licensee or may own the property from which the service operates. In addition, it is also a key provider of kindergarten programs with 92% of councils owning infrastructure from which programs operate.

It is noted that the Victorian Government contributes funding for capital works for children services determined by the government and that new centres have been identified by the government to be built over the next few years. <sup>13</sup>

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<sup>13</sup> Childcare Taskforce, October 2006, Victorian Government

## **Funding support for families**

The bulk of Commonwealth funding for childcare has been through the payment of Childcare Benefit (CCB) and the Child Care Tax Rebate (CCTR).

However, it can be considered that this mechanism of funding allows for the corporatisation of the industry and limits the government responsibility to ensuring quality education and care.

Child Care Benefit (CCB) is a fee subsidy payable to families using registered care or approved services.

Almost all long day centres in Australia have been accredited. However concerns regarding the adequacy of accreditation and licensing processes have been identified and noted further into this report.

In addition, although the CCB is linked to CPI, fees for childcare have been rising higher than the CPI.

The corporate monopoly of childcare services has made it harder for governments to control levels of childcare fees.

An increase in the childcare tax rebate or to the CCB easily becomes a gift to the “for-profit” organisations, as they have been able to lift their prices knowing that the taxpayer will pay for the cost of any increase.

While an increase in the tax rebate may ease the costs faced by parents in the short term, inevitably the additional subsidies will be absorbed into higher prices and the spiral will continue.

### **The IEUA supports the exploration of alternative subsidy structures which would ensure more regulation on early childhood education and care fees.**

A further identified problem regarding the current mechanism of Commonwealth funding is that it denies parents choice when considering childcare or education services.

For example, in NSW, there is a significant discrepancy which financially disadvantages families who send their children to preschool (as opposed to childcare) and this has negatively impacted enrolments in NSW preschools. In NSW, preschool fees are on average around \$40 per day. This is unaffordable for many families.

The ineligibility for CCB and CCTR means that a significant number of families must consider the payment of preschool/kindergarten fees unsubsidised or choose childcare.

### **The IEUA recommends for the funding divisions between early childhood education and childcare to be lifted and parents be able to access CCB and CCTR or similar financial support for either service.**

### **(iii) Funding to ensure equity of access**

Corporations engage in “residualisation”, where they cater only to the most profitable parts of the industry, leaving non-profit organisations to care for those children who require services that decrease profitability<sup>14</sup>

Such “residualisation” has resulted in the over-supply of places for 3-5 years olds but a chronic shortage of places for 0-2years. Evidence demonstrates that as little as 8 percent of places for children of the ages 0-2 years are provided by ‘for profit’ childcare centres in NSW.<sup>15</sup>

Research has also shown that Indigenous communities and families from Non-English Speaking backgrounds experience disproportionate difficulties in accessing appropriate services.<sup>16</sup>

**The IEUA can report that currently some small preschools classes in the Northern Territory have been conducted by teacher assistants or by teachers without formal early childhood education qualifications due to supply and funding issues.**

Children need access to planned play based educational programs conducted by qualified early childhood teachers. One to one teaching is necessary for students to fully grasp and understand language, numeracy and literacy concepts and this can only be achieved through adequate provision of qualified early childhood teachers and assistants .

“Residualisation” has also led to a severe shortage of places for children with disabilities. Government funding provides only up to \$60 per day for preschools and up to \$84 per day for long day care centres to enrol children with high support needs. As this subsidy does not reflect the costs of providing education and care for children with disabilities, the “for profit” childcare sector has little motivation to offer them places.

IEUA members have reported that one corporate childcare chain refused to accept children with additional needs into their centre unless parents had already secured Federal funding. However, these children are only allowed to attend the centre for the five funded hours per day, irrespective of centre opening hours.

Consequently, community-based centres are called upon to enrol increasing numbers of children with additional needs. This places additional pressures on the centres, their staff and their children care and education.

**The IEUA strongly believes that, in order to address this problem, government must review its funding structures to cover the cost of employing additional staff, training and the purchasing of resources to care for and educate children with additional**

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<sup>14</sup> Press, F, (2005) p 278-291

<sup>15</sup> Purcal and Fisher (2004)

<sup>16</sup> Press & Hayes, (2000), p 35

**needs appropriately, thus ensuring equity of access to early childhood education and care.**

*Terms of Reference*

*C (ii) The role of government at all levels in the consistent regulatory frameworks for childcare across the country*

The IEUA recognises and supports the work of the Productivity Agenda Working Group in regard to the development of a National Quality Framework for early childhood education and care.

The IEUA has made submissions regarding the development of the National Quality Framework and the Early Years Learning Framework.

In summary, the IEUA has called for the following essential elements to be recognised by a National Regulatory Framework.

1. That play based curriculum and qualified early childhood teachers and teacher assistants/childcare workers are key drivers to quality early education;
2. That children benefit from long term, stable care relationships. The recruitment of qualified teachers and teacher assistants/childcare workers require secure jobs, attractive salary and conditions and recognition for higher education and professional development;
3. That high quality of early childhood education is a function of staffing ratio, teacher skills and group size. Any commitment to high quality early education and care must require implementation of international best practice of staff child ratios. (One adult to three children for infants, one adult to four children for one to two year olds; and at least one adult to eight children for three to five year olds).<sup>17</sup>
4. That quality education occurs when teachers are supported with appropriate time to undertake all that is required of them. Resources must be made available to allow staff adequate time to undertake program design, documentation, reporting and inservice training. Additional administrative duties arising from implementation of national standards should not deter from the preparation and provision of quality education.
5. That quality early childhood education services for rural and indigenous communities must involve community development activities. This will ensure that services meet the particular needs of communities and that they remain viable in the longer term.
6. That not all early childhood education and care environments, children and communities are the same. A rating system for early childhood education and care must

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<sup>17</sup> Ibid, p35

be mindful of the various needs of the sector in terms of remote and regional, low SES environments and providers.

The IEUA refers the Senate inquiry to these submissions for further details.

### *Terms of Reference*

#### *C (iv) The role of government at all levels in the licensing requirements to operate child care centres*

In research undertaken by the Australian Institute in 2005, community based long day care centres were identified as providing the highest quality of care. Independent private centres offer a quality of care that was usually similar to that of community based centres. The survey suggested that corporate chains offer the lowest quality of care on all aspects of quality surveyed.<sup>18</sup>

The current mechanism of licensing does not address nor ensure quality of education and care across the sector.

From information provided by IEUA members in New South Wales, concerns exist in some long day care centres regarding the process of Quality Improvement and Accreditation System (QIAS).

Validator visits to centres are either one or two days in length and in this brief time they must ask questions of the director and other staff, observe the staff interacting with children, families and other staff members, check QIAS documentation and make a judgment regarding their recommendation of how well the centre meets benchmarks of quality. One day is not an adequate amount of time to complete all of these tasks satisfactorily.

The limited time QIAS Validators are currently present within a centre does not allow time for thorough assessment of practices or any attempt to be made towards supporting or mentoring staff. Validators observe what occurs in centres but do not give advice regarding how staff can improve the quality of their service.

NSW Department of Community Services Advisors no longer provides professional advice to services, they ensure that the service is meeting licensing standards only. Many services do not have access to any professional support services.

**The IEUA supports the replacement of individual state-based standards and licensing regulations with a national quality standards if such a mechanism provides a more streamlined and consistent approach to the delivery of early childhood education and care and is of a higher quality than that already in existence in the various States and Territories.**

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<sup>18</sup> UNICEF, Report Card 8, (2008), p 30



**The IEUA considers the following as essential elements to ensuring quality education and care and thus underpinning a validation system of a provider:**

- **Child-staff ratios, staff qualifications, group sizes;**
- **Child-staff interactions;**
- **The educational content of the curriculum, program evaluation and assessment of children's learning/development;**
- **Health and safety;**
- **Relationships with families; and**
- **Policies and procedures.**

In particular reference to child-staff ratios, the IEUA strongly believes that national quality standards must reflect or better international best practice. Research supports staff-child ratios of at least one adult to three children for infants (1:3); at least one adult to four children for one to two year olds (1:4); and at least one adult to eight children for three to five year olds (1:8).<sup>19</sup>

**Further, the IEUA believes that ongoing personnel support, resources and professional development need to be provided for centres to continually improve their quality standards.**

### **Terms of Reference**

#### **C (v) Nationally consistent training and qualification requirements for childcare workers**

The requirements for early childhood educational providers to employ teachers with tertiary early childhood qualifications varies across the nation.

For instance, teachers within community kindergartens in Queensland must be specialised, tertiary early childhood education trained teachers who are registered under the Queensland College of Teachers. The majority of teachers possess a four year degree qualification in early childhood. The degree qualification focuses on the learning and needs of children in this particular stage of development.

Teachers with specialised early education qualifications possess significantly greater knowledge and skills in relation to early childhood learning theories and models than employees with other qualifications.

In addition, ongoing professional development requirements for teachers to undertake a minimum level of professional development each year exist in many collective agreements.

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<sup>19</sup> OECD Country Note

However, this is not the situation in all early childhood facilities, especially in childcare facilities.

In NSW, while Department of Education preschools employ tertiary qualified early childhood teachers, in other settings a qualified early childhood teacher does not have to be employed until there are 30 children enrolled in a unit. Even with this restriction, many services have an exemption to this requirement. The highest number of exemptions are granted to the “for-profit” services.

IEUA have been informed through the Department of Community Services of private providers who are building two separate buildings next door to one another with 29 places each in order to avoid the need to employ Early Childhood Teachers.

Equally problematic are the existence of “interim approvals” regarding staffing. Some private providers in NSW hold a disproportionate number of interim approvals, allowing them to employ a TAFE trained Child Care Worker instead of a qualified teacher for up to 12 months. These approvals are consistently renewed.

**The IEUA believes that quality early childhood education and care is provided only through tertiary qualified and registered (where applicable) early childhood teachers supported by qualified early childhood teacher assistants/childcare workers.**

**Further, the IEUA believes that teacher assistants/childcare workers working in early childhood education and care should have ready access to achieving a Certificate III or Diploma qualification in early childhood education/development.**

Such qualified early childhood teachers and assistants/childcare workers utilise their comprehensive knowledge of child development to observe and assess children’s abilities, strengths and needs and to plan appropriate activities and experiences in a play based learning setting in order to address each of these.

The IEUA acknowledges the Federal Government’s commitment to providing early childhood specialist teachers for 15 hours of preschool education for all three and four year olds as a positive step towards addressing the issue.

The IEUA also acknowledges other positive Federal Government initiatives such as the allocation of \$53.9 million to increase university places for Early Childhood Teachers and \$12.4 million to reduce HELP debts for teachers who work in regional and high-disadvantage areas are important measures to address the shortage of qualified staff.

However, more needs to be done Teachers and teacher assistants/childcare workers need to be supported through funding for accessible, affordable and relevant ongoing professional development and through equitable salary and working conditions.

***D. The feasibility for establishing a national authority to oversee the childcare industry in Australia.***

The States and Territories are responsible for two key aspects of early childhood services – curricula and regulations, while the Federal Government is responsible for accreditation.

This division of responsibility between State and Federal governments results in wide variations in the conditions under which childcare is delivered. With regard to curricula, the States vary in relation to specifying curricula use and form. The States also vary as to which early childhood services are subject to regulation, and what those regulations require.

Research has demonstrated that a stringent and enforced regulatory environment has a positive impact on quality<sup>20</sup>.

**The IEUA supports initiatives which ensures consistency to the delivery of quality early childhood education and care. However, the IEUA believes that it is essential than any mechanism must recognise and protect the individual community and child’s needs whilst ensuring quality.**

**Conclusion**

The collapse of the ABC childcare corporation has highlighted the need for more support for viable community based early childhood education and care that is not aimed at pure profit but at delivering quality service.

Creative solutions need to be developed to meet the early childhood education and care needs of parents in the future without compromising standards of education and care for our children or imbedding inequitable staffing conditions and arrangements.

There is a strong need for Government at all levels to take on more responsibility in guaranteeing high quality of early childhood education and care for all Australian children.

Unless such support is provided to non-profit providers, families will continue to experience the lack of quality childcare and lack of choice.

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<sup>20</sup> Rush, E & Downie, C, p3

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