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Your submission for this review:

Blacktown City Council provides a submission in draft due to the timing of the release of the Terms of Reference (TOR). Council recognises the draft TOR as a catch-all approach to information gathering for the early childhood sector. However, there are a few areas of the TOR where Council believes it is prudent to provide its perspective and proposed additional scope requirements to the Draft TOR. These are outlined in the attached for your consideration.

File number: 87-108-1

10 January 2023

IPART Early Childhood Education and Care Review Team  
Independent Pricing and Regulatory Tribunal

By email: [ipart@ipart.nsw.gov.au](mailto:ipart@ipart.nsw.gov.au)

### **Submission - Draft Terms of Reference - Review of NSW early childhood education and care (ECEC)**

Blacktown City Council provides this submission as draft due to the timing of the release of the Terms of Reference (TOR).

We reserve the right to vary and or add to our submission based on Council's consideration of the matter.

Blacktown City Council is the largest owner and operator of childcare education and care services in the Blacktown local government area.

We operate 28 services including long day, preschool, before and after school, vacation and family day care.

Our childcare services employ in excess of 300 staff and care for over 1700 children per week.

Council notes the specificity of the review as a response to the NSW Government's Early Years Commitment. A \$15.9 billion investment over 10 years in the NSW early childhood education and care sector.

Importantly, the NSW Government investment in early childhood focuses heavily on the provision of 'Universal Pre-kindergarten' for all children the year before school.

From information released to date, the NSW Government direction is for this provision to be delivered through an increase of preschools within existing school sites.

Obviously, this presents additional supply to meet demand and NSW Government objectives. It also provides competition for existing community preschools including Council's own services.

Notwithstanding this issue, Council recognises the draft TOR is a catch-all approach to information gathering for the early childhood sector.

Council supports this approach as a good basis of market and customer insight to drive future strategy development.

However, there are a few areas of the TOR where Council believes it's prudent to provide its perspective and proposed additional scope requirements to the Draft TOR.

These areas are as follows:

Area	Perspective
Competitive neutrality principles	<p>We submit a view that existing and new NSW Government owned preschools have to operate on an equal footing with existing community preschools.</p> <p>To ensure an equal footing, the TOR needs to be very specific with the data and information that is gathered and that it can be segmented by service type, geographic area, children population and current ECEC supply.</p> <p>In addition, the TOR needs to account for the variable legislation and regulation that exists by service/provider type. This includes but is not limited to assessment and rating process, specific educator qualifications, child safety and the legal requirements of local government and not for profits.</p>
Compliance with NSW and Australian Government legislation	<p>We submit a view that the TOR needs to include a comprehensive review of the current administrative requirements for the operation of a childcare service.</p> <p>Over the past 10 years the administration requirements of ECEC providers has grown considerably. For many operators, staff are working above and beyond normal operating hours just to maintain administration requirements.</p> <p>This requirement is a significant un-costed workload of the ECEC sector. Information that identifies the extent of this workload will assist greatly in accurately calculating the real cost of operating a childcare service.</p> <p>And, in turn a nominal value of 'voluntary' hours supplied by the current workforce.</p>
Workforce supply	<p>We submit a view that workforce supply is the critical ingredient to growing the supply of early childhood services (e.g. Universal Pre-kindergarten).</p> <p>Specifically, that supply of additional services should correlate with workforce growth.</p> <p>Therefore, the TOR needs to look at the future sources ECEC worker supply. It needs to identify certificate, diploma and degree enrolment trends. A qualitative review of school leavers attitude and appetite for working in the ECEC sector would also be beneficial.</p>

In summary, Blacktown City Council welcomes the review of NSW early childhood education and care sector.

It's a timely initiative for a sector that's vitally important to a community's future well-being, but one that is currently under significant workforce supply pressure.

If there are any questions with regard to this submission, please direct them to [REDACTED] by email [REDACTED] or telephone [REDACTED].