

20<sup>th</sup> December 2017

Mr Tim Bullard  
Acting Secretary – Tasmanian Department of Education  
Level 2, 73 Murray Street  
GPO Box 169  
Hobart TAS 7001

**RE: Draft Policy to guide co-location of Early Childhood Education and Care and Department of Education Services**

Dear Mr Bullard,

I write today on behalf of our Australian Childcare Alliance Tasmania (ACA Tas) members in relation to the recently circulated Draft Policy to guide co-location of Early Childhood Education and Care and Department of Education Services. ACA Tas has a number of concerns regarding the draft policy. It is our view that inadequate sector consultation in the initial development of the policy has created a poorly conceptualised policy with significantly confused strategic intent.

From a policy intent perspective, several members have raised concerns as to the true purpose of this policy. Is the policy prescribing a future where all Tasmanian Early Childhood Education and Care services are co-located with schools? If so, ACA Tas and its members are adamantly opposed to this approach. The negative impact on accessibility for Tasmanian families would be significant, as would the economic cost to the Tasmanian community and Government.

Alternatively, even if the policy is more positively aimed at improved management of lease arrangements for ECEC services co-located with schools, it is our view that the policy content is flawed and confusing. We highlight the following issues with the draft policy for your consideration and feedback:

- The strategic intent of the policy requires further clarification.
- If the intent is purely to improve outcomes on lease arrangements for ECEC services on school properties, much of the policy content could be streamlined and simplified.
- A major flaw with the proposed policy is that it does not address the significant issues that our members report regarding less than desirable relationships with schools and school principals. This policy does not appear to address those concerns or even set positive guidance on how these relationships should be managed. Formulating an agreed framework (updating the Making Connections publication) should be the priority at this point in time.
- It is questionable that the procurement and tendering process proposed within the draft policy is appropriate or the best approach.
- A one size fits all approach to selecting and managing a service provider is not appropriate.
- It appears that aspects of this draft policy would be better managed as part of a lease agreement. This could be extended to include performance, quality and relationship requirements for both the School and the ECEC service.

We feel that the above policy issues could have been identified and resolved prior to circulation through greater consultation with the sector during policy development. We are given to understand that a sub-committee of the Tasmanian Early Years Reference Group was formed to develop the draft policy. How this group was selected, their terms of reference and their mandate for engaging the sector remains unclear. We request more adequate consultation with the sector on future policy development. Specifically, we respectfully ask that a representative of ACA Tas is included in all such future policy development groups.

We also note that ACA Tas was not included in the request for feedback distribution list on launch of the draft policy and neither were the majority of our members. So that we can appropriately engage our members to provide evidence based and timely responses, we politely request that all future Tasmanian policy briefs be sent direct to the ACA Tas office by either of the following means:

- Email – [tas@childcarealliance.org.au](mailto:tas@childcarealliance.org.au)
- Post – 6/539 Highett Road, Highett, VIC, 3190.

Given the range of issues identified, we are requesting that the policy is immediately withdrawn and re-worked by the Department of Education with direct sector input. We advise that ACA Tas members are interested and available to participate in this process, prior to the policy being re-circulated to the sector for final feedback. I look forward to a positive response to this request and advise that I can be contacted by phone on 03 9532 2017 should you have any further questions.

Sincerely,



Paul Mondo  
ACA National President

CC:

The Hon. Jeremy Rockliff  
Deputy Premier, Minister for Education and Training

The Hon. Michelle O'Byrne  
Deputy Leader of the Opposition, Shadow Minister for Education