

Network SA Resource Advisory & Management Services Inc.

Network SA Resource, Advisory and Management Services Inc. is a non-profit community organisation which supports South Australian children's services. We work in urban, rural and remote areas of the State.

Our services include:

- ARMSU (Aboriginal Resource and Management Support Unit) working with SA's Aboriginal children's services as a specialist support and resource service funded by the Australian Government under the Inclusion and Professional Support Program (IPSP) as an Indigenous Professional Support Unit (IPSU)
- ARMSU Resource Centre, lending Aboriginal resources to child care services, OSHC, family day care, playgroups, health services, preschools and schools.
- Network SA management support service which is sub-contracted by the SA Professional Support Coordinator (PSC) to provide generic management and governance information and advice to eligible children's services Inclusion and Professional Support Program (IPSP) funded by the Australian Government Department of Education.
- Network SA Extra providing professional management support services to members.

Our comments will focus mainly on the issues faced by BBF services, particularly Indigenous BBF services, as there are already many voices speaking for mainstream child care services.

- **DRAFT RECOMMENDATION 5.2**

Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

Chapters 3 and 5 of the draft report identify four groups of children with additional needs who potentially experience disadvantage in accessing ECEC services, yet are most likely to benefit from greater access to formal ECEC services before they start school. They are children:

- from low income families
- with a diagnosed disability
- at risk of abuse or neglect
- who are developmentally disadvantaged because of characteristics of the child's family, culture or location.

These disadvantages are compounded by issues commonly found in remote and rural communities such as hearing loss due to otitis media, poor nutrition, unsafe living arrangements, poor hygiene and crowded housing arrangements. Access to basic health services, let alone specialist support, may be limited. The BBF care and education service in such a community may be the only 'health' service readily available to families. Health services may be rostered to visit at intervals on a fly in fly out basis.

For some families the school may be a less trusted venue or contact point. We believe that the model for Multifunctional Aboriginal Children's Services (MACS, which was devised in the 1980's but never fully implemented, is the best option for families with young children. As we understand it, the original vision was for a fully integrated service based in the child care centre, offering health, family support, education and care services under one roof. Unfortunately the services were never funded sufficiently to fulfil this vision.

- **DRAFT RECOMMENDATION 7.8**

Governments should extend the scope of the National Quality Framework to include all centre and home based services that receive Australian Government assistance. National Quality Framework requirements should be tailored towards each care type, as far as is feasible, and minimise the burden imposed on services.

We support extending the scope of the National Quality Framework (NQF) to include all centre and home based services that receive Australian Government assistance. However, it is essential that the transition process is progressive, supporting previously out of scope services to undertake what may be significant change in terms of location, facilities, infrastructure, staffing numbers and qualifications, equipment and policies.

Currently, the Quality Improvement Strategy (QIS) for BBF services is being implemented progressively to enable services to satisfy the requirements. At the same time, in South Australia, the Regulatory Authority has been consulting with those child care services such as BBFs which are not currently in scope to explore the likely impact of current regulations and the appropriateness of the terminology used. We believe that this combined strategy will help to ensure a successful transition. We are concerned that in some States and Territories there appears to be little connection between the implementation of regulations and introduction of the NQF.

It is important that the NQF requirements are tailored to service types, while maintaining a focus on children's needs. In particular, very small and / or remote services should not risk penalties because it cannot meet the same expectations as a potentially well-resourced regional or metropolitan centre based care and education service.

- **DRAFT RECOMMENDATION 12.6**

The Australian Government should establish three capped programs to support access of children with additional needs to ECEC services.

We support the need for continuation of targeted block funding for rural, regional and remote services and believe that it should be extended to current metropolitan Indigenous BBF services which experience similar issues to those in other areas or locations. In order to

meet the needs of Aboriginal and Torres Strait Islander families and their children, all Indigenous BBF services must have the flexibility to be able to operate at a high standard regardless of fee income. The core groups using these services are vulnerable to the effects of poverty and social dislocation, and often have limited alternative resources to support them.

Children from disadvantaged backgrounds have the greatest need to access quality early learning and care. A transition to child-based funding would create obstacles to the provision of quality care in most existing BBF services including requirements such as allowable absences, priority of access, increased contact with Centrelink and bureaucratic processes and the activity test.

We have significant concerns about the structure and limitations of the proposed Viability Assistance Program. The proposed three in seven year funding model will put at risk the capacity of many BBF services to provide ongoing quality care and education. We are unsure how this 3 in 7 model was arrived at and what evidence there is that such a system would work in favour of children, families and communities. How will the needs of families, children and communities be met via an exit strategy? Does this mean that there will be no service because the community cannot support an unsubsidised service? We find this possibility deeply concerning. It suggests that if families cannot afford to support a service financially that services will be withdrawn from already vulnerable children.

Supporting children to access a solid foundation for formal and informal education for life begins in the early years, not when they start school. If we are to see improvements in school attendance rates, particularly in remote areas, we must continue to invest in the early childhood sector. We are concerned that proposals such as this will erode what has been gained so far, rather than benefit children.

The pressure to maintain financial viability in areas or amongst populations where job security is limited or almost unknown, where droughts and other natural disasters can have effects lasting years, where there is a high degree of social dislocation and social disadvantage and / or there are higher than average levels of substance abuse in the community can have a crippling effect on children's services.

If a service is subject to fluctuating utilisation and uncertain funding status it will quickly lose staff and find it hard to attract replacements. The pool of potential available staff can be extremely limited. Once staff members are employed it is critical that they are retained and given access to professional learning opportunities. Already services in disadvantaged and remote areas struggle to find relief staff so that current employees can take leave or travel for training. Finding the right staff can be more challenging than for other types of services when significant cultural competence is an essential requirement along with professional child care and education qualifications. Services in remote areas have the added disincentive of isolation.

Economic viability of a small community is subject to many factors outside the control of the child care service. However, the children in the community may be more disadvantaged as a community changes. Many Aboriginal families are transient, and pressure can be placed on a community when there is a sudden population increase or decrease. This creates increased economic pressures either way and can be compounded by the shortage of or loss

of support structures as agencies struggle to meet needs (or close their doors because client numbers have reduced).

Change brought about by the provision of quality care and education services is a gradual process, which requires all human services in a community to be working together. They cannot achieve meaningful change if they are working in isolation from each other or at risk of losing funding unless they are financially viable independent of government funding.

One of the strengths of the current BBF model is that services can plan with a reasonable amount of certainty for continuous improvement over years within a culturally competent framework. We believe that ongoing block funding is the most viable option for these services, together with funding of coordination activities to support integration of services to families.

Although the proposed Disadvantaged Communities Program may provide some certainty, it appears that the guidelines, focussing on 'concentrations of children in highly disadvantaged communities' may be too restrictive to include many of the children currently attending BBF services in metropolitan and country areas.

- **DRAFT RECOMMENDATION 12.7**

The Australian Government should continue to provide support for children who are assessed as 'at risk' to access ECEC services (for up to 26 weeks of education and care at 100% of the deemed cost, but only if they are part of the child protection system.)

Children at risk of harm benefit substantially from access to education and care and so can their families. The service provides them with a safe, supportive and nurturing environment in which to learn and 'be'. It is essential for the well-being of the child and the support needs of the family that care and education is not interrupted by changes in 'status' as determined by an overcrowded and impossibly stretched child protection system. Children in vulnerable families may remain at risk long after an initial crisis period. Our responsibility as a community is to continue to provide long term support to such families as they build and consolidate their strengths.

BRIEF COMMENTS RE OTHER RECOMMENDATIONS

WE SUPPORT:

- DRAFT RECOMMENDATION 7.3 A nationally consistent set of staff ratios and qualifications for those caring for school age children in out of school hours and vacation care services
- DRAFT RECOMMENDATION 7.10 A nationally recognised working with children check
- DRAFT RECOMMENDATION 8.2 A requirement that all schools to take responsibility for organising the provision of an outside school hours care service where demand is sufficiently large for a service to be viable.

- DRAFT FINDING 12.1 Diverting funds from the proposed new Paid Parental Leave scheme to early childhood education and care and Out of School Hours Care
- DRAFT RECOMMENDATION 12.2 Introduction of a single Early Care and Learning Subsidy (ECLS) to replace CCB, CCR and JET Child Care Fee Assistance
- DRAFT RECOMMENDATION 12.9 Ongoing funding by the Australian Government for universal access to 15 hours of preschool
- Encouragement for employers to trial innovative approaches to flexible work and other family friendly arrangements
- Regulatory oversight and regular audits by the Australian Skills Quality Authority to ensure that Registered Training Organisations maintain consistently high quality standards in their delivery of ECEC-related training – we have serious concerns about the quality of training provided in some RTOs; ‘qualified’ staff who are poorly trained cost employers when they cannot fulfil the requirements of the job and can have a seriously detrimental effect on children and on staff morale in a centre.

WE DO NOT SUPPORT:

- DRAFT RECOMMENDATION 7.2 Requiring educators working with children under 3 to only hold the minimum Certificate III level qualification
 - DRAFT RECOMMENDATION 7.4 Reducing OSHC ratios to ratios that are currently acceptable for children during school hours – children in before and after school and vacation care need access to choices not possible in a classroom situation; simultaneous offerings such as large group activities, quiet time with one or two special friends or withdrawal for some quiet reading; time for a one on one conversation with a trusted, unhurried adult; freedom to move indoors and outdoors, to run, to choose from a range of interests, to eat and drink, to rest; younger children will need the option of moving away from the older children and vice versa; introverts will need a break from the stimuli that keep their more extroverted friends energised and all children in the OSHC need access to competent adults to make each of these safe and realistic options.
 - DRAFT RECOMMENDATION 8.1 Removing the requirement for most children attending an outside school hours care service to be of school age – the current requirement works in the interests of children
 - DRAFT RECOMMENDATION 10.1 Removal of eligibility of not for profit providers to payroll tax and Fringe Benefit Tax (FBT) exemptions
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