

National Association of Mobile Services for Rural & Remote Families & Children Inc.

**Mobile Children's Services:
Promoting and fostering the well-being, welfare and care
of families with children
living in rural and remote regions of Australia**

**Response to the Productivity Commission's
Draft Report on *Childcare and Early Childhood
Learning***

**There are still many children and their families and
communities in rural, regional and remote Australia
who do not have reasonable access
to high quality early childhood education and care.**

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1. Executive Summary

Following is information on Mobile Children's Services affected by the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning* [The PC Draft Report] and a summary of the National Association of Mobile Services [NAMS] policy positions on the key Mobile Children's Services issues arising from the *PC Draft Report*.

Mobile Children's Services operate where the local educationally focused, early childhood development service system is unable to provide reasonable access for children in isolated circumstances.

There are still many children families and communities in rural and remote Australia who do not have reasonable access to a high quality early childhood care and learning experience.

Mobiles work in communities where the market has failed: A proactive effort is required to address unmet demand. This will require a campaign by, and extra funding from, the Australian Government.

The key issues arising from the Draft PC Report for NAMS are:

- The Productivity Commission Draft Report doesn't address in any detail the Terms of Reference element to consider the "current and future need for child care in Australia ...including ... the particular needs of rural, regional and remote parents".
- There is a need for a proactive approach to addressing unmet demand for childcare and early learning in rural, regional and remote areas.
- All regulated Mobile Children's Services should be in-scope under the National Quality Framework.
- Mobile Services funded under the Australian Government's Budget Based Funding Program [BBFP] and that do not provide 'non-parental care' should be subject to a *Code of Practice* adapted from the National Quality Standard and Early Years Learning Framework
- The level of funding of Mobile Services should allow for the delivery of a good quality, affordable, well managed and safe service
- A proactive approach to addressing unmet demand and changes in funding administration and regulation will have a profound effect on BBFP funded Mobile Services: A dedicated support program, similar to the Quality Measures program, and a representation and resourcing project must be in place to facilitate the expansion and transition efforts.

NAMS is keen to work with the Australian Government to support a proactive effort to ensure that children, their families and communities have reasonable access to a childcare and early learning experience.

Following are snapshots and tabulated descriptions of the type of Mobile Services, their areas of operation and states.

A profile of Mobile Services in general and BBFP funded Mobiles in particular is provided in Appendices 1 and 2 plus a listing of BBFP funded Mobile Services in Appendix 3.

A snap shot of Mobile Services affected by the Productivity Commission's Inquiry

The Australian Government funds forty six [46] under the Budget Based Funding Program and are therefore subject to the PC's efforts on the funding of EC services.

Of the forty six BBFP funded Mobile Services, **only twenty six [26] are regulated** as providing non-parental care, in a dedicated or irregular way, and are currently out-of-scope to the NQF being state regulated.

Non care providing Mobile Services funded by the BBFP provide a mix of educationally focused strategies primarily in support of early childhood development but necessarily including support on parenting and community development: **The best early childhood practitioners are also excellent family support and community development workers.**

Approximately seventy [70] Mobile Services in Australia are regulated by State Governments to provide non-parental care and are therefore subject to the question of whether they become in-scope under the National Quality Framework. These services mirror the standard, regulated, early childhood services types: LDC; Occasional Care; Preschool; In-home care.

Most Mobile Services in Australia, including most BBFP funded services, **operate on a 'universal access' basis** rather than specifically 'targeting' particular population groups. These services are the 'soft entry point' to access ECEC experiences and additional supports for children by all community members including Indigenous children, children with a disability, children from low income families and vulnerable or at risk children **and their parents.**

The NSW Government funds forty five [45] Mobile Preschools [Included in the seventy state regulated services] and are therefore subject to the PC's thoughts on the excision of Preschools from the NQF and the Australian Government's funding of State Governments for universal access to Preschool.

A snap shot of the types and regulation of BBFP Funded Mobile Services

Appendices 2 and 3 profile and list the BBFP funded Mobile Services. Of note for the funding of these services and the structure of the program are:

- Forty four of forty six [44/46] work in Outer Regional to Very Remote communities with twenty eight in Remote and Very Remote Communities [28/46].
- The major Mobile Service type is the multi-strategy Mobile Playsession Service [21/46] where twenty work in Outer Regional to Very Remote areas [20/21]
- Twenty six of forty six [26/46] are regulated by State Governments being services that provide non-parental care and are out of scope under the NQF
- The majority type of regulated BBFP service is the LDC-ish Mobile Child Care Service [16/46] which now incorporate some recently funded innovative/flexible services. There are two Mobile Occasional Care and four in-home/on-property services that have some form of state based regulation. Six of the ten BBFP funded Mobile Playsession Services in NSW are regulated for the irregular care they provide.

Table 1: BBFP Mobile Service by remoteness, State and Licence

Remoteness	No.	NSW	Vic	SA	Qld	NT	WA	Tas
Inner Regional	2	1	1	0	0	0	0	0
Outer Regional	16	8	3	2	1	0	1	1
Remote	12	3	2	1	2	1	3	0
Very Remote	16	4	0	2	4	2	4	0
Total	46	16	6	5	7	3	8	1
Licensed	26	12	5	3	3	0	2	1

Table 2: BBFP Mobile Service by remoteness and predominant Mobile Service type

Remoteness	No	PS	MCCS	MOCS	Mobile In-home	Adjunct	MF	Mobile Preschool	Lic.
Inner Regional	2	1	1	0	0	0	0	0	1
Outer Regional	16	5	9	1	1	0	0	0	13
Remote	12	5	5	1	0	0	0	1	9
Very Remote	16	10	1	0	3	1	1	0	3
Total	46	21	16	2	4	1	1	1	26

Key

PS = Mobile Playsession Service [Some licensed for formal Occasional Care]

MCCS – Mobile Child Care Service [LDC-ish][Licensed]

MOCS – Mobile Occasional Care [Licensed]

Mobile In-home = Care provided on provided on properties and in-homes

Adjunct Care: Supervision provided in immediate vicinity of parents

MF = Multi-function [RICE too hard to categorise]

Preschool – Mobile Preschool [Licensed with focus on 4 year old children]

Table 3: BBFP Mobile Service type by state

Mobile Service type	No.	NSW	Vic	SA	Qld	NT	WA	Tas
Mobile Playsession	21	10	1	1	1	3	5	0
Mobile Child Care	16	6	5	2	2	0	0	1
Mobile Occasional Care	2	0	0	0	0	0	2	0
Mobile In-home Care	4	0	0	1	3	0	0	0
Mobile Preschool	1	0	0	0	1	0	0	0
Multi-function	1	0	0	1	0	0	0	0
Mobile Adjunct Care	1	0	0	0	0	0	1	0
Total	46	16	6	5	7	3	8	1
Licensed	26	12	5	3	3	0	2	1

NAMS Policy Position 1:

That DE conduct an Australia-wide asset and gap analysis, at sub-regional level, for the purpose of describing the local, care and education focused, early childhood development service system to identify geographical areas where the market does or could fail to meet childcare and early learning needs.

NAMS Policy Position 2:

That a redeveloped Child Care Services Support Program [CCSSP] include a child care market analysis and funding mechanism to allow for growth of the LDC-like Mobile Child Care/Flexible Innovative Services [In areas where the market doesn't adequately support the viable operation of mainstream services] to address unmet demand.

NAMS Policy Position 3:

That a redeveloped Child Care Services Support Program include an early childhood learning gap analysis and a funding mechanism to allow for the growth of the multi-strategy BBFP funded Mobile Children's Services, such as Mobile Playsession Services, in communities where there is no reasonable access to a high quality, educationally focused, early childhood development experience.

NAMS Policy Position 4:

That the Australian Government examine the utility of the *Remote and Isolated Children's Exercise* and *Remote Area Family Services* projects in very remote communities with the intention of extending the models intra- and interstate.

NAMS Policy Position 5:

That the Productivity Commission Inquiry address the extent of current and unmet demand for childcare and early childhood learning in rural, regional and remote areas and recommend and cost a growth strategy that would see demand met where parents have no reasonable access to an ECEC service.

NAMS Policy Position 6

That MCSA supports the relaxation of operational requirements specifying minimum or maximum operating parameters in the child-based subsidy system for the purpose of extending access of LDC-ish services in rural, regional and remote communities.

NAMS Policy Position 7

That the Budget Based Funding Program be renamed and retooled to reflect a status and intent as the location of responsive, flexible and innovative, educationally focused, early childhood development services [FLECS]

NAMS Policy Position 8

That the Australian Government work with BBFP funded Mobile Services to ascertain the real costs of delivering the different types of Mobile Service in their various circumstances.

NAMS Policy Position 9

That Mobile Children's Services funded by the BBFP remain block funded

NAMS Policy Position 10

That funding levels in the Budget Based Funding Program recognise the real cost of service delivery.

NAMS Policy Position 11

That the Budget Based Funding Program ensure that annual grant indexation is at a level that enables services service to maintain the level and quality of service delivery

NAMS Policy Position 12

That funding for Budget Based Funding Program services be reinstated to the real value of funding in 2007

NAMS Policy Position 13

That the Australian Government, through the COAG process, continue, rationalise and make effective the provision of funds under the National Partnership Agreement on Universal Access to Early Childhood Education to the effect that the States have a clear idea of the amount and timing of a guaranteed level of funds available to them, at least three years in advance.

NAMS Policy Position 14

That funding programs supporting children with additional needs provide funding for dedicated staff hours to support children and their families through all the different phases and aspects of the work.

NAMS Policy Positon 15

That the guidelines for additional needs support programs be reviewed to account for the circumstances of children in isolated circumstances and the operational circumstances of ECEC services that support them

NAMS Policy Position 16

That all regulated, care-providing, Mobile Children Services become in-scope under the NQF and that each jurisdiction has the capacity to transition their non-NQF services when they deem them ready.

NAMS Policy Position 17

That non-regulated BBFP funded Mobile Services be subject to a *Code of Practice* adapted from the EYLF and National Quality Standard.

NAMS Policy Position 18

That a dedicated, Australia-wide, Mobile Children's Service representation and resourcing project be funded by the Australian Government to facilitate improved access to ECEC services and the transition of Mobile Children's Services into the NQF as well as support non-regulated services to develop and implement an Code of Practice.

NAMS Policy Position 19

That extra renewable funds be provided to BBFP funded Mobile Services to cover any extra costs in service delivery, including capital costs, due to services transitioning to the NQF or implementing a Code of Practice.

1. Introduction

This is the National Association of Mobile Services for Rural and Remote Families and Children Inc. [NAMS] response to the Productivity Commission Draft Report on *Childcare & Early Childhood Learning* [The PC Draft Report or the PC Inquiry]

There are still many children and their families and communities in rural, regional and remote Australia who do not have reasonable access to high quality early childhood education and care.

NAMS is the peak body for Mobile Children's Services Australia-wide and is particularly focused on those Mobile Services funded under the Australian Government's Budget Based Funding Program [BBFP].

Both the Australian Government and NAMS have a common interest in children, their families and communities accessing high quality early childhood services in rural, regional and remote areas.

In this submission, NAMS focuses on four critical areas:

1. Unmet demand for early education & care services in rural, regional & remote areas
2. The funding mechanism for flexible and innovative children's services working in rural, regional and remote areas, including appropriate levels of funding
3. Incorporation of regulated Mobile Children's Services into the National Quality Framework [NQF]
4. Resourcing and supporting Mobile Children's Services through change

Mobile Children's Services provide flexible, responsive, innovative, educationally focused services to children, their families and communities that are experiencing social, geographical, cultural and/or economic isolation.

Isolation often involves a combination of these circumstances.

Mobile Services travel to communities and provide childcare and early childhood learning experiences in local facilities, often non-purpose built for childcare, including community halls, school facilities, sports facilities and properties.

Mobiles work in hundreds of communities, supporting thousands of children who would otherwise have no reasonable access to an early learning experience.

NAMS has identified approximately one hundred and forty [140] Mobile Children's Services in Australia: Ninety four in NSW plus forty six BBFP's Australia-wide, including sixteen BBFP's in NSW.

All up, the PC Inquiry covers ninety [90] Mobile Children's Services: Regulated and BBFP funded Mobile Services

A snap shot of Mobile Services affected by the Productivity Commission's Inquiry

Approximately seventy [70] Mobile Services in Australia are regulated by State Governments to provide non-parental care and are therefore subject to the question of whether they become in-scope under the National Quality Framework. These services mirror the standard, regulated, early childhood services types: LDC; Occasional Care; Preschool; In-home care.

The Australian Government funds forty six [46] under the Budget Based Funding Program and are therefore subject to the PC's efforts on the funding of EC services.

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Non care providing Mobile Services funded by the BBFP provide a mix of educationally focused strategies primarily in support of early childhood development but necessarily including support on parenting and community development: **The best early childhood practitioners are also excellent family support and community development workers.**

Most Mobile Services in Australia, including most BBFP funded services, **operate on a 'universal access' basis** rather than specifically 'targeting' particular population groups. These services are the 'soft entry point' to access ECEC experiences and additional supports for children by all community members including Indigenous children, children with a disability, children from low income families and vulnerable or at risk children **and their parents.**

The NSW Government funds forty five [45] Mobile Preschools [Included in the seventy state regulated services] and are therefore subject to the PC's thoughts on the excision of Preschools from the NQF and the Australian Government's funding of State Governments for universal access to Preschool.

A profile of Mobile Services in general and BBFP funded Mobiles in particular is provided in Appendices 1 and 2 plus a listing of BBFP funded Mobile Services in Appendix 3.

Mobile Children's Services operate where the local educationally focused, early childhood development service system is unable to provide reasonable access for children in isolated circumstances.

In other words, Mobile Services operate where the market based system in Australia fails rural, regional and remote children and their families and communities.

Mobiles make real the Australian Government's focus on high quality, accessible, flexible and responsive child care and early childhood learning services which support the development of children, the employment needs of parents and the requirements of local employment markets.

They can provide a range of service strategies to rural, regional and remote communities, providing the possibility of choice for parents.

Mobile Services make real the aspirations of Government, communities and parents that children have the opportunity to realise their full potential.

The reality is that services are provided each day across vast geographical areas, including specific communities of need that make up the rich tapestry of Australian society,

Mobile Services are critical elements of sub-regional, educationally focused, early childhood development service systems. They are not afterthoughts or second tier services: They are the front-line in their communities.

Underlying the work of Mobile Children's Services is the irresistible knowledge that the early years are critical for the development of children, their future prospects, a decent society and a successful economy.

This submission addresses four critical issues and several key recommendations of the PC Draft Report, narrowed to focus on the operations of Mobile Children's Services and their ability to provide accessible, affordable, high quality and safe services to their communities.

NAMS supports the Secretariat of National Aboriginal and Islander Child Care [SNAICC] in their submission focusing on the Indigenous identified services in the BBFP.

This submission also provides a view on several broader matters and refers to the position and arguments provided by Early Childhood Australia [ECA].

2. NAMS' response to key Mobile Service specific issues

Following are comments on four critical issues arising from the PC Draft Report.

[I] Equity and equal access: Unmet demand for early education and care services in rural, regional and remote areas

[i] A proactive growth strategy to address unmet demand

This comment applies to both the 'non-parental care' [ie: Regulated care] and multi-strategy ECD Mobile Services [Parents are present at structured, educationally focused sessions]: See Appendix 1 and 2 for a description of the various Mobile Children's Service types.

In principle, Mobile Children's Services should not compete with good quality, centre-based children's services. They should provide a service where children have no reasonable access to an ECEC experience.

See Appendix 1 for a description of other principles and aspects of Mobile Service operations, including the 'advance and withdraw' principle.

NAMS was very pleased to see that the Terms of Reference of the PC Inquiry included consideration of the [current and future] "particular needs of rural, regional and remote parents"

This was particularly so because NAMS members have felt for nearly a decade that there hasn't been serious and systematic consideration of unmet demand in those rural, regional and remote communities where they operate, either for the LDC-ish Mobile Child Care Services [Now including some 'mobile' flexible/innovative services] or the non-care type of BBFP funded Mobiles providing a multi-strategy, early childhood development service.

The BBFP has remained a capped source of funding.

This is an inequitable situation compared to those parents able to access a CCB/CCR system without any cap.

Neither major political party at the last Federal election addressed the issue of access.

What NAMS would like to see is the Australian Government being proactive and vigorous in ensuring that children in isolated circumstances have access to an early learning experience.

Anecdotally, the majority of BBFP funded Mobile Services of all types report unmet demand:

- Unmet demand from communities who do not receive a service primarily because the Mobile cannot 'grow' to meet need.
- Unmet demand from communities who currently receive a service but would like more days and extended hours but, again, the Mobile cannot 'grow' to meet need

These expressions of unmet demand are credible and persistent and a cause of concern to many Mobiles as they have to constantly justify why they can't provide a service to a new community and why they can't provide an extra day[s] or extend hours at a current venue.

This was very problematic after the breaking of the drought, families returned and a baby boom boosted the number of families and children in many communities.

Following the principle of 'building on current infrastructure', most Mobile Services reporting unmet demand could increase in size, some to the effect that they could add a second Mobile 'unit'.

So far, this comment applies to Mobiles Services and the communities they currently work in.

In straight 'geographical isolation' terms, a mapped view of the areas covered by existing BBFP funded Mobile Services in each state also illustrates isolated areas where there are no Mobile Services and potentially no reasonable access to an educationally focused, early childhood development experience.

The PC Draft Report provides some data and characterisation of unmet demand across all Australia. Unfortunately it is at too large a scale to come to terms with the focused analysis we expected for rural, regional and remote children and parents.

Whilst NAMS expects there to be unmet demand that can be satisfied by the current types of early childhood services, Mobile Services offer a particular access model where they **travel to underserviced communities that would never justify a stand-alone ECEC service.**

South Australia and Queensland provide some very different types of early childhood services to very remote communities.

NAMS commends the on-property [A variation of in-home care] work of South Australia's Remote and Isolated Children's Exercise [RICE] and Queensland's Frontier Service's Remote Area Family Services [RAFS].

These have long been considered as variants of the 'mobile' model and are considered as such by the Department of Education.

NAMS notes the submissions to the PC Inquiry by the Isolated Children's Parents' Association of NSW [ICPA] and the Federal ICPA [Australia] with recommendations about improved access to Mobiles and In-home Care, mapping of supply and demand, rectification of market failure, use of school infrastructure and preschool age use of school buses.

NAMS notes the Australian National Audit Office's [ANAO] Report No 7 2012-13 *Improving Access to Child Care – The Community Support Program* recommended that the then

DEEWR “analyse the child care market, including the areas where the market would fail to meet care needs without Community Support Program funding” [p19].

Given the parallels between ‘market failure’ aspects of the Community Support Program [CSP] and the BBFP, NAMS believes that this ANAO recommendation has great value.

NAMS Policy Position 1:

That DE conduct an Australia-wide asset and gap analysis, at sub-regional level, for the purpose of describing the local, care and education focused, early childhood development service system to identify geographical areas where the market does or could fail to meet childcare and early learning needs.

NAMS Policy Position 2:

That a redeveloped Child Care Services Support Program [CCSSP] include a child care market analysis and funding mechanism to allow for growth of the LDC-like Mobile Child Care/Flexible Innovative Services [In areas where the market doesn’t adequately support the viable operation of mainstream services] to address unmet demand.

NAMS Policy Position 3:

That a redeveloped Child Care Services Support Program include an early childhood learning gap analysis and a funding mechanism to allow for the growth of the multi-strategy BBFP funded Mobile Children’s Services, such as Mobile Playsession Services, in communities where there is no reasonable access to a high quality, educationally focused, early childhood development experience.

NAMS Policy Position 4:

That the Australian Government examine the utility of the *Remote and Isolated Children’s Exercise* and *Remote Area Family Services* projects in very remote communities with the intention of extending the models intra- and interstate.

NAMS Policy Position 5:

That the Productivity Commission Inquiry address the extent of current and unmet demand for childcare and early childhood learning in rural, regional and remote areas and recommend and cost a growth strategy that would see demand met where parents have no reasonable access to an ECEC service.

NAMS acknowledges the difficulty the Productivity Commission will have in assessing unmet demand in these locations. In practice, for example the establishment of the Mobile Child Care Services in the late 1990’s, assessment requires a fine, grounded, more localised needs analysis in likely areas. This is where a systematic and regular sub-regional asset and gap analysis will provide a starting point.

In any event, to be true to the Government’s pledge of equity, extra funding has to be made available so that access is made real.

[iii] Relaxation of mainstream funding operational restrictions

NAMS has long thought that it is unfair that the majority of Australian parents are able to access an uncapped CCB/CCR system in viable child care markets and those parents located where the market fails are unable to gain access just because the BBFP is capped and bars the development of new services.

Mobile Child Care Services and innovative/flexibles are a ready-made service model to meet demand in areas of 'market failure' if the BBFP becomes uncapped or allows for new services or if the CCB/CCR system is somehow able to fund these types of service.

Draft Recommendation 8.3 of the PC Draft Report calls for the Government to abolish operational requirements that specify minimum or maximum operating weeks or hours for services approved to receive child-based subsidies.

Relaxation of the mainstream operational parameters has the potential to both provide better access in some rural, regional and remote communities per se and **extend the reach of the care-providing Mobiles.**

Whilst a straight 'growth' mechanism through the BBFP would be a more efficient and effective option for both the establishment and continuing operations of Mobile Child Care Services, the scenario arises that a 'mobile' type of care providing service could establish several venues in a district under a relaxed 'child-based subsidy' system.

It is in the provision of service to several venues under a 'mobile' model that economies of scale are gained and the venture would become cost-effective and financially viable.

The deemed cost would need to be at an appropriate level and the service should be able to access viability assistance if needed.

The 'mobile' model could undertake the hard slog of establishing extra venues and extend service delivery through a BBFP growth mechanism and then venues could be assessed for transition to this relaxed 'mainstream' model.

Care would need to be taken that such a transition would not compromise the financial viability of the entire service as Mobile Services operate on the principle of more successful venues cross subsidising less utilised venues, a principle that ensures communities with lower population densities are equitably dealt with.

NAMS Policy Position 6

That NAMS supports the relaxation of operational requirements specifying minimum or maximum operating parameters in the child-based subsidy system for the purpose of extending access of LDC-ish services in rural, regional and remote communities.

[II] Program structure and funding mechanism for flexible and innovative children's services working in rural, regional and remote areas, including levels of funding

The PC Draft Report addresses the current and possible future Australian Government funded ECEC funding system, through child based and program based payments, as well as the structure of the overall program.

Of critical concern to NAMS are:

- Generating an awareness of the types, funding and regulation of BBFP Mobiles so that public policy is sound
- The appropriateness of the funding methodologies and program structure for Mobile Services
- The level of funding for Mobile Services: A major and persistent concern
- Continuation of an effective NPA on Universal Access to Early Childhood Education

[i] Mobile Children's Services in Australia and the Budget Based Funding Program

As is to be expected, the majority of the PC Draft Report addresses the larger parts of the system: Child based subsidies and programs supporting access, affordability and professionalism across thousands of ECEC services.

BBFP funded Mobiles represent only a small number of services addressed by the PC Draft Report, forty six [46], and forty six of the three hundred and forty services [340] in the BBFP, however, they are a critical component of sub-regional, educationally focused, early child development service systems, covering a huge geographical area and supporting hundreds of communities and thousands of children.

How hard can it be to ensure that a redeveloped ECEC funding and regulation system enables this small number of critical services to do the best work they can?

A snap shot of the types and regulation of BBFP Funded Mobile Services

Appendices 2 and 3 profile and list the BBFP funded Mobile Services. Of note for the funding of these services and the structure of the program are:

- Forty four of forty six [44/46] work in Outer Regional to Very Remote communities with twenty eight in Remote and Very Remote Communities [28/46].
- The major Mobile Service type is the multi-strategy Mobile Playsession Service [21/46] where twenty work in Outer Regional to Very Remote areas [20/21]
- Twenty six of forty six [26/46] are regulated by State Governments being services that provide non-parental care and are out of scope under the NQF
- The majority type of regulated BBFP service is the LDC-ish Mobile Child Care Service [16/46] which now incorporate some recently funded innovative/flexible services. There are two Mobile Occasional Care and four in-home/on-property services that have some form of state based regulation. Six of the ten BBFP funded Mobile Playsession Services in NSW are regulated for the irregular care they provide.

Please note that the NSW Government funds and regulates forty five [45] Mobile Preschools, several are funded jointly under the BBFP and several auspiced by organisations also providing a BBFP funded Mobile Service out of what could be described as an integrated ECEC setting.

[ii] Being positive – Naming a sub-program about flexibility and responsiveness

NAMS notes that there are some communities where care-providing ECEC services would never be viable if judged only on financial criteria.

These are often small, 'isolated' communities where the work of an ECEC service is strategically placed as a 'soft entry point' in an integrated, early childhood development service system to provide benefits for young children and their parents and communities and long term benefits for all stakeholders including the wider society and economy.

There is a clear local and wider community benefit for continuing to fund these services that are financially unviable under the mainstream system [PC Draft Report p539].

NAMS notes that there cannot be an ECEC service on every street corner or in every community. However, at some scale, ECEC services do not have to provide non-parental care to achieve success. The multi-strategy Mobile Playsession Services deliver educationally focussed sessions to communities where LDC or Preschool is financially unviable or not in demand.

NAMS is pleased that children living with a disability, indigenous children and children at risk of abuse or neglect are identified in the PC Draft Report as requiring additional assistance 'per child' and overall in the proposed child-based stream and program assistance stream.

NAMS is pleased that the 'program assistance' stream highlights communities where there is a concentration of children who are highly disadvantaged and supports in principle the three sub-streams of program assistance illustrated in Figure 7 [p19] of the PC Draft Report.

However, NAMS does not agree with the use of the term "Disadvantaged" in the Disadvantaged Communities Program as it is stigmatising. The term could equally apply to those children eligible for the proposed Special ECLS.

The current Child Care Services Support Program manages to use language that is non-stigmatising.

Further, whilst BBFP funded Mobiles provide services in disadvantaged communities and to children from disadvantaged families, they are primarily 'universal' service providers.

Communities and their children are not disadvantaged just because they are rural, regional and remote. These are locations where Australian's get their beef, wheat, copper and gold from and Australians are happy to live there.

In accord with the recommendation in the BBFP Review Final Report, NAMS believes a renaming of the re-developed BBFP should have a positive connotation, highlighting flexibility and responsiveness to communities with unique needs who have a right to forms of ECEC services adapted to the population's circumstances.

NAMS Policy Position 7

That the Budget Based Funding Program be renamed and retooled to reflect a status and intent as the location of responsive, flexible and innovative, educationally focused, early childhood development services [FLECS]

[[iii]] Funding methodology and program structure

A significant amount of space is given in the PC Draft Report to an intention to drive BBFP services out of operational/block funding arrangements into the mainstream 'child based' funding system.

This is consistent with a similar drive in the recent Review of the BBFP and the BBFP Review Final Report, although the BBFP Final Report acknowledges that such a transition is unlikely for many services.

However, at most, driving BBFP funded Mobile Services into the 'child based' funding system can relate to only twenty [20] of the regulated BBFP funded Mobiles, those services dedicated to providing non-parental care [Discounting the six Mobile Playsession Services in NSW regulated for their irregular care provision].

Twenty six of the forty six [26/46] BBFP funded Mobile Services have a multi-strategy, educationally focused service delivery model that primarily doesn't involve non-parental care and, as such, **will never be candidates for a 'child based' subsidy system.**

NAMS view is that it is unlikely that a long term business case can be developed that would enable the twenty regulated, dedicated non-parental care, BBFP funded Mobiles to transition to a 'child based' funding arrangement.

This is consistent with the findings and recommendations of Professor Deborah Brennan's review of NSW state funded ECE services, where Mobile Preschools and other services with viability problems because of fluctuating and low utilisation and remoteness related higher cost structures will be subject to a contracting model of funding: Operational funding based on a functional relationship between the level of NSW Government funding and the actual cost of an agreed level and quality of service delivery.

As usual, a good idea needs an action plan and a budget to test just how 'good' it is.

NAMS welcomes analyses that describe the costing of the various types of BBFP funded Mobile Services. These would be grist to the mill of both the processes that will lead to the growth of the Mobile Service system to address unmet demand as well as realistically costing and funding the delivery of services.

NAMS Policy Position 8

That the Australian Government work with BBFP funded Mobile Services to ascertain the real costs of delivering the different types of Mobile Service **in their various circumstances**.

[iv] The long term benefits of an operational subsidy funding system

As stated above, NAMS believes that driving the forty six BBFP funded Mobile Services to a child-based subsidy is not applicable in most circumstances and has low utility in others.

It would only ever apply to a small number of the twenty [20] non-parental care type of Mobile Services in the BBFP, mainly the Mobile Child Care Services and Innovative/Flexibles.

As such, the following does not apply to the twenty six BBFP funded Mobiles that do not offer dedicated non-parental care.

Of those that could transition to a child based payment, NAMS suspects that these would be continuously applying for Viability Assistance. The proposed three years in seven would not work.

Stability of funding levels over the long term is a cornerstone of the successful operation of the care-providing Mobiles.

There are many reasons to retain operational funding for BBFP funded Mobiles:

- The care providing Mobiles operate where their centre-based LDC and occasional care equivalents are not viable. One Mobile Service covers several communities where others are not viable: Cost effective!
- A known level of Government revenue, over contracts of three years, allows for designing the service to cost and circumstance: Travel time from base; Type of roads travelled on; Staffing required at each venue for quality, safety and ratios; Storage and carry options at different venues; Different standards of safety at the venues; Safety in general requires time and effort and money; Avoiding the roller coaster of variable revenues allows stability of service provision over the long term. **Designing a Mobile Service is an artform.**
- Stability in the establishment phase of a service or new venue
- A known amount of funding, over several years, allows better planning for staff and capital items: Vehicle as well as EC, Office and Base equipment plus venue modifications

- A known amount of funding, over several years, provides the confidence to implement the advance and withdraw principle which leads to changes in venues in response to community changes or indeed adding additional venues and extending days and hours when additional funds are available
- Stability through short term or seasonal ups and downs in utilisation and fee revenue: Frost, hail, grasshoppers, mice, crickets and fluctuating commodity and minerals prices.
- Stability through longer term ups and downs in utilisation due to weather events affecting agricultural and mining revenues and density of population: Droughts and continuous floods affecting agricultural production over many years as well as downturns in mineral and commodity prices
- Highly utilised services cross-subsidise farther flung or less utilised venues where the latter is of great community benefit
- Stability in service quality where staff teams can be developed for the long term through a long term PD strategy
- Revenue at consistent levels to ensure continuing ability to pay incentives for recruitment, retention and other conditions such as on-going PD – See PC's *ECD Workforce Study*
- Ability to pay the extra costs of PD in rural and remote areas
- Allows implementation of long term projects to increase quality, such as gearing up for meeting the NQS or engaging new communities or establishing links and collaboration with the local ECD service system
- Less administration time and effort applied to administering the CCB/CCR system. Also makes it easier for parents living in more geographically isolated areas.
- Many care providing Mobiles are sponsored by and often co-located with a major ECEC provider in regional towns. Venues are located so that they don't compete with in-town services, are able to take advantage of economies of scale from larger providers and access the allied health resources associated with larger, more integrated, regional township service providers.

NAMS notes that, whilst they are cost effective, Mobile Children's Services are not cheap! Accessibility, flexibility, responsiveness, high quality and safety have a cost.

Operational subsidy/block funding is the goose that laid the golden egg for the dedicated LDC-ish Mobiles, both in establishing them and in their on-going operations.

NAMS is keen that services establish a schedule of fees commensurate with what parents would pay, out of pocket, if they were attending a mainstream care-providing ECEC service.

Given the extensive number of variables involved, designing a Mobile Service as 'fit for purpose' in a given area is an artform.

NAMS believes that this rich tapestry of service operations and costing will operate against attempts to derive a deemed cost for Mobiles, irrespective of transitioning to a child based subsidy.

NAMS notes that the BBFP Review Final Report is also keen on formulas. Time to move on from this notion!

Again, NAMS is happy to support crunching the numbers to see if there is a business case for a transition to the child-based subsidies or if there is a useful funding formula that doesn't require more than ten variables to consider: Staff qualifications, ratios, incentives and experience; Travel distance; Type of vehicle adapted to standard of road; Base and venue costs;

NAMS Policy Position 9

That Mobile Children's Services funded by the BBFP remain block funded

[v] Underfunding, pure and simple

The Australian Government must address the chronic underfunding of BBFP services.

Levels of funding have had, for a very long time, no functional relationship to the cost of delivering a service in the very exceptional circumstances of Mobiles.

The annual grant indexation is inadequate.

Speaking for BBFP funded Mobiles, most report that the level of funding continues to fall in real terms, the costs of delivering a service is rising inexorably and underfunding is creating the situation where current levels of service delivery are unsustainable and need to fall.

NAMS notes that the usual operational and financial imperative is that expenditures are cut to bone in order to maintain the level of service delivery as cut backs create extremely adverse outcomes, especially the eventual loss of staff: Retention and recruitment of qualified and experienced staff is the key to a successful service.

NAMS notes that cutting expenditures to the bone creates a downward spiral on service quality and safety.

Surely, as a matter of equity, and as many children and parents in more densely populated areas can access an ECEC service at reasonable costs through the CCB/CCR system, BBFP funded services can be properly funded to deliver affordable, high quality and safe services?

NAMS is not proposing service delivery by Rolls Royces. Just a good quality family six will do the job.

Again, Mobile Services are cost effective but they are not cheap: Access, quality and safety have a cost.

Again, NAMS welcomes efforts to properly cost the different types of Mobile Service **in their various circumstances.**

If the Australian Government is to act to address unmet demand in rural, regional and remote areas, the services need to be properly funded.

NAMS Policy Position 10

That funding levels in the Budget Based Funding Program recognise the real cost of service delivery.

NAMS Policy Position 11

That the Budget Based Funding Program ensure that annual grant indexation is at a level that enables services to maintain the level and quality of service delivery

NAMS Policy Position 12

That funding for Budget Based Funding Program services be reinstated to the real value of funding in 2007

[vi] The National Partnership Agreement on Universal Access to Early Childhood Education

NAMS is keen that the Australian Government continue to fund the *National Partnership Agreement on Universal Access to Early Childhood Education*.

This NPA provides a substantial proportion of funds to forty five [45] Mobile Preschools as well as joint funding to five [5] of the BBFP funded Mobile Child Care Services in NSW.

Loss of the NPA funds would be a critical blow to both Mobile Preschools and the joint funded BBFP services, most of which work in regional and rural areas.

NAMS notes that the NSW Government has clearly indicated that Mobile Preschools are a critical component of their mission to expand access to localities where children do not have reasonable access to 'Universal Access'.

NAMS notes the difficulties the NSW Government and the Australian Government have in administering these funds to the extent that there has been considerable uncertainty which interferes with fund administration and, in turn, the ability of Preschools to plan long term.

NAMS Policy Position 13

That the Australian Government, through the COAG process, continue, rationalise and make effective the provision of funds under the National Partnership Agreement on Universal Access to Early Childhood Education to the effect that the States have a clear idea of the amount and timing of a guaranteed level of funds available to them, at least three years in advance.

NAMS does not support the PC Draft Report's split of 'education' and 'care', differential staffing levels for the under threes, removal of Preschools from the NQF and other recommendations about the different responsibilities of State and Australian Governments.

[vii] Children with additional needs

NAMS notes the focus on children with additional needs in the PC Draft Report and welcomes the proposed increase in funds.

NAMS notes the critical work of Mobile Services in identifying and supporting the needs of children with disabilities living in isolated areas. This covers all ages and particularly requires the employment of well qualified and knowledgeable staff, especially for younger children.

Feedback from services indicate that the guidelines to funding programs could better recognise the needs of children with a disability living in isolated circumstances.

NAMS Policy Position 14

That funding programs supporting children with additional needs provide funding for dedicated staff hours to support children and their families through all the different phases and aspects of the work.

NAMS Policy Position 15

That the guidelines for additional needs support programs be reviewed to account for the circumstances of children in isolated circumstances and the operational circumstances of ECEC services that support them

[III] Incorporation of regulated Mobile Children's Services into the National Quality Framework [NQF]

NAMS is a strong supporter of the National Quality Framework [NQF] and believes in a national system where all regulated/non-parental care services, irrespective of funding source or type, should be in-scope under the NQF.

[i] The regulated Mobile Services

NAMS estimates that there are currently seventy [70] Mobile Services, Australia-wide, regulated by State Governments. These are out of scope under the NQF.

The majority of these are forty five [45] Mobile Preschool projects in NSW and sixteen [16] BBFP funded Mobile Child Care Services [Including Flexible/Innovatives] throughout Australia. There are also a small number of Mobile Occasional Care and regulated In-home care projects funded by the BBFP

By far the majority of regulated Mobile Services would like to be in-scope under the NQF: Regulated ECEC should be a national system.

Mobiles are a critical component of local, educationally focused, ECD service systems: Mobilers are keen that their services not be seen as second tier.

The NSW Government has been supporting Mobile Preschools to become in-scope under the NQF through a resourcing project auspiced by the Mobile Children's Services Association of NSW. A transition pathway has been set, beginning with the implementation of the EYLF and adaptation of the NQS to circumstance: Most Mobile Preschools are well along this path.

The Australian Government has set a policy direction to bring the BBFP funded Mobiles [As well as the other regulated services in the BBFP] into the NQF with the Quality Measures, the direction of the *BBFP Review Final Report*, some aspects of the administration of the BBFP, volunteer trialling of a Quality Improvement Plan [QIP] and elements of the National Early Years Workforce Strategy all being evidence of this intent.

The regulation of Mobile Services is well established in NSW and Victoria and has clear alignment in important respects with the National Law, making for easier transition and regulatory models for other jurisdictions.

NAMS believes that the current National Law and Regulations can be adapted to deal with the non-purpose built nature of venues and that Mobiles should be subject to all the other structural and process aspects of regulation, along with the other in-scope service types.

NAMS Policy Position 16

That all regulated, care-providing, Mobile Children Services become in-scope under the NQF and that each jurisdiction has the capacity to transition their non-NQF services when they deem them ready.

[ii] The non-regulated Mobile Services

The majority of Mobile Services funded by the BBFP are not regulated. These services do not provide non-parental care.

Being Australian Government funded they should be subject to a quality assurance process. Administrative aspects of the BBFP have already instituted a QA process in all BBFP services, mirroring aspects of the EYLF and NQS.

Whilst the non-regulated Mobile Services provide educationally focused services, they do not provide 'care' and will never be subject to most of the structural and process elements of regulation except as 'industry standards' to adapt to circumstance: A code of practice based on the EYLF and NQS would suffice.

NAMS Policy Position 17

That non-regulated BBFP funded Mobile Services be subject to a *Code of Practice* adapted from the EYLF and National Quality Standard.

[IV] Resourcing and supporting Mobile Children's Services

The next few years will see a lot of change for Mobile Services through the PC Inquiry, the *Review of the National Partnership Agreement on the National Quality Agenda for Early Childhood Education and Care* and *Review of the Budget Based Funding Program*.

If the PC Inquiry is to come to terms with the need to mount a supply side intervention to increase access in rural, regional and remote communities and if Mobiles are to become subject to the NQF or a *Code of Practice*, then services will require a great deal of support.

NAMS Policy Position 18

That a dedicated, Australia-wide, Mobile Children's Service representation and resourcing project be funded by the Australian Government to facilitate improved access to ECEC services and the transition of Mobile Children's Services into the NQF as well as support non-regulated services to develop and implement an Code of Practice.

NAMS has developed business case for a resourcing project.

On top of any extra funds required for growth to address unmet demand, the transitions will have a cost for services.

The BBFP's Quality Measure, not available to BBFP funded Mobiles, provides a model of the types of resourcing required.

NAMS Policy Position 19

That extra renewable funds be provided to BBFP funded Mobile Services to cover any extra costs in service delivery, including capital costs, due to services transitioning to the NQF or implementing a Code of Practice.

3. Comment on other aspects of the PC Draft Report

NAMS believes that all children, irrespective of family circumstance, should have a right to access Australian Government funded ECEC services.

The NQF is only in the initial stages of a 'harmonisation' process set to change the face of the regulation and funding of ECEC services in Australia over the long term.

Although the Australian Government's reform of the funding aspect of the PC Inquiry's Terms of Reference is critical now, the problems in the initial phases of the NQF should be dealt with by adjustments rather than wholesale changes to the quality-inducing structural and process elements of the NQF.

There are several elements of the PC Draft Report regarding mainstream, child-based payments and program supports that NAMS agrees with in principle:

- A single, child based subsidy payment with supplements for children in particular circumstances that will facilitate their participation and eliminate cost barriers to participation
- Extra funding for children with additional needs
- The means tested loading of child based funding to the lower to mid SES family circumstances
- The level of child based subsidy having a functional relationship to the cost of providing a service, especially across differential age costs and for service types with unique costing dynamics or are located in rural and remote areas
- Co-ordination funding for integrated services under the proposed Disadvantaged Communities Program
- Continuation of program based inclusion and professional support
- Viability funding where level and consistency of utilisation and various cost factors are problematic, although the three years in seven criteria is likely to be unworkable
- A nation-wide working with children check

NAMS does not agree with:

- Removal of State funded Preschools from the NQF: This should be a national system which includes all care providing ECEC services
- Splitting 'care' for the under three and 'education' for the plus threes
- Reducing the standard of staff who care and educate for the under threes. Certificate III is a minimum industry standard where these staff and the programs they provide must be closely supervised by better qualified staff who also directly support the development of children of all ages.
- NQS changes which lower the standards or reduce the focus on critical community wide issues such as environmental sustainability.

NAMS supports Early Childhood Australia's positions as described in their initial submission and presentation to the Commissioners on the Draft Report.

4. Conclusion

This response to the Productivity Commission's Draft Report on *Childcare and Early Childhood Learning* argues for a **deeper consideration of the unmet needs in rural and remote communities** for services providing educationally focused, early childhood development services, be they offering approved care and education or non-licensable activities.

The Australian Government has an ambitious reform agenda in place for the early childhood sector.

For BBFP funded services, these reforms, related to both regulation and funding, are already significantly under way with the reworking of the BBFP guidelines.

For all licensed Mobile Children's Services, a transition pathway for being in-scope under the NQF is already in place at Australian and State Government levels and many services are well along this path.

The current trajectory of the NQF should remain in place.

NAMS is keen that public policy is sound and that services are supported to both implement the reforms as well as supported on day to day service delivery issues, particularly on those areas of practice that are specific to the way Mobiles work.

There are still many children families and communities in rural and remote Australia who do not have reasonable access to a high quality early childhood care and learning experience.

Mobile Children's Services are the ideal vehicle for delivering these services to rural, regional and remote communities.

NAMS commends this submission.

Anne Bowler
President
NAMS

September 2014

Appendix 1: About Mobile Children's Services in general

Mobile Children's Services throughout Australia are 'fit for purpose', educationally focused, early childhood development services, working in isolated communities, however isolation is defined.

Isolation may be geographical, cultural, social and/or economic and often a combination of these.

As is the case with other early childhood services, Mobiles aim to support the development of a child's full potential, giving them a good start.

Research on brain development in children and the deleterious effects of under-stimulation, neglect or abuse, underline the crucial role that structured early childhood activities, provided by competent educators, play in the development of children.

In an ecological sense, children live in families in a social and economic context. Ensuring a decent neighbourhood contributes to a good childhood.

Following is an outline of the 'big ideas', the 'rhyme and reason' for Mobiles, addressing the work of all Mobiles, not only Budget Based Funding Program services [BBFP].

BBFP services are addressed in [Appendix 2](#).

NAMS would like to thank the NSW Mobiles peak, MCSA, for parts of this section.

[i] Where Mobile Children's Services 'fit' in the childcare & early childhood learning service system

The following places Mobile Children Services and the different service types more formally within the context of the wider Early Childhood Development [ECD] sector and the systems of support which enable children to achieve their potential.

It is useful to describe the place of Mobile Services in the ECD sector by using the *National Early Childhood Development Strategy: Investing in the Early Years* as a framework.

The *National Early Childhood Development Strategy: Investing in the Early Years* [NECDS] is a well thought out, 'big picture' strategy bringing together the diverse elements of the Australian way of doing things to the effect that, with everyone working together, children have the best start in life.

Commonwealth and State Governments have signed on to this strategy through the Council of Australian Governments [COAG] process and subsequent National Partnership Agreements.

The NECDS outlines ways that the early childhood 'service system' can contribute to the 'best start in life' vision.

This includes ensuring the provision of good quality early childhood education and care services, supporting parents in the many aspects of their parenting role [including as educators, of course], articulating and supporting the different levels of service system intervention and valuing inter/intra-sector collaboration: A structured and holistic approach to many matters that impact on the development of children in their very different circumstances.

[a] The regulated ECEC services

Good quality educationally focused, early childhood development services are crucial to the achievement of the 'best start' vision.

The term 'educationally focused' is used here to distinguish these services from health and welfare services that are also child-focused. Of course, good ECEC services are well-connected to local health and welfare service systems.

Mobile Services mostly operate as 'universally' accessible services. Some services are 'targeted' for particular communities and a minority are provided as 'intensive focus' services.

All Mobile Children's Services are educationally focused, ECD services.

For regulated services, the *National Quality Framework* [NQF] articulates from the *National Early Childhood Development Strategy*, focussing on quality in the education and care of children and includes a structured and holistic approach to supporting the development of children in other domains such as health and welfare.

These are generally called early education and care services [ECEC].

There are approximately seventy [70] regulated Mobile Children's Services in Australia, providing access to a structured early development experience.

Mobiles are a sub-sector of the regulated, ECEC services sector and are made available in circumstances where children and their families do not have reasonable access because of the various forms of isolation, particularly where the free market doesn't work or never will.

From a service system funding perspective, Mobile Services should not compete with good quality and similar types of centre-based services. This is now captured in the principles underlying the BBFP.

Whilst the regulated Mobile Children's Services are currently out-of-scope under the NQF, there are elements of the NQF that are being implemented now in the services as frameworks and guides to good practice.

Mobile Preschools, Mobile Child Care Services [LCD-ish] and Mobile Occasional Care Services are regulated ECEC services.

The regulation status of In-home/On-property services needs research.

Some Mobile Playsession Services in NSW are regulated for the occasional times they do provide formal care.

[b] The non-regulated, educationally focused early childhood development sector

Again, all Mobile Children's Services are educationally focused, ECD services.

However, many are not regulated early education and care services: The parents are present at sessions and have formal care of their children. They work in different ways towards the same vision.

The non-regulated Mobile Children's Services still generally provide a structured early childhood development activity [Education through play], however, the context and focus of service provision is different and other child development and parenting issues and support strategies are brought to bear.

Most services support early childhood development through structured play sessions for children and supporting parents on the multiple aspects of their parenting as well as connecting child to child and parent to parent to foster and facilitate 'community'

Mobile Playsession Services are the modern day village pump.

Mobile Toy Libraries may provide structured play sessions, however, their underlying foci is on the development of children through the provision of quality early childhood equipment and resources as well as supporting parents in their role as educators.

Community Access Mobile Minder Services or Adjunct Care Services, sometimes called creches, provide structured play sessions to groups of children while their parents are in an adjacent room attending to other life matters in sessions run by health professionals and various agencies such as Anglicare. In technical terms, as they are "in the Immediate vicinity", the parents still have care: Mobile Adjunct Care Services 'supervise' the children, bringing to bear all the practices involved in any 'care' type of session.

In all the non-regulated types, where the parent has to be present or in the 'immediate vicinity', there is also a strong element of supporting parents in their various roles, through listening, information, discussion, advice and referral to other agencies.

The parents are at the 'session' and it is an ideal opportunity to have informal conversations.

In the service system, they are the less formal, 'non-stigmatising entry points': Trusted and embedded in their communities.

In general, they are services mostly targeted at 'Universal access' rather than 'targeted' or 'intensive support'. This, of course, usually varies with the funding source and the 'priority of access' in the various funding programs.

The many non-regulated services can also act as an alternative service system approach to engaging and supporting 'communities of interest' on important issues.

They provide a different strategy to regulated, care providing, ECEC services to achieve the same result, perhaps about immunisation, exercise, nutrition, child development, managing child behaviour, child protection or school readiness.

For example, the issue may be about the value of regulated ECEC services. The non-regulated services are important information disseminators, referral agents and often stepping stones to the regulated ECEC services.

Mobile Playsession Services always include a range of child and parent support strategies. They are the backbone of EC services in remote and very remote communities. They are often the only local community service in a district, the only professional ear and advocate and drought relief to boot!

[ii] Some characteristics of Mobile Children's Services

Mobiles are about fair and **reasonable access** to a good quality early development experience for children, their families and communities in isolated circumstances.

Following are some other principles and characteristics that underlie the work of the services.

These vary from service type to service type and community to community.

[a] Advance and withdraw

Mobile Services are generally seen as ‘advance and withdraw’ community services where they provide activities at a time and place that no other educationally focused, early childhood development service is **reasonably available** to a child and their family through the standard centre-based/‘come-to-us’ service system.

As ‘advance and withdraw’ community services, Mobiles have to be flexible to meet local needs and be responsive to waxing and waning demand as well as emerging needs.

As communities develop, the EC service system generally develops to provide reasonably accessible services and Mobile Services may no longer be needed.

In the main, **because the market fails to deliver to some communities**, usually because of low density/utilisation or poor capacity to pay, the regulated Mobile Children’s Services are subsidised at relatively high rates by Governments.

As the factors that make ECEC services viable improve over time and as the centre-based service system expands, the principle arises that relatively highly subsidised services should not compete with good quality, equivalent types of ECEC services. They should move on.

This is particularly the case in urban development areas and major regional towns and local districts.

However, **some communities will never have a critical mass of children** to justify a centre-based/come-to-us or market based solution to access. The venue of such Mobile Children’s Services, located to draw from a wide hinterland becomes, more or less, permanent.

The advance and withdrawal principle is particularly apt for the regulated Mobile Children’s Services who provide an early childhood education and care service: Service systems develop and centre-based ECEC service types gradually fill the space so that Mobile Children’s Services are no longer needed. They should move on.

As well, it is often the case that Mobile Children’s Services work in locations where there is an accessible centre-based alternative but this alternative does not address the particular needs of some population groups whether that be about the quality of care or cultural competence. Access to culturally competent ECEC services is a key issue addressed by many Mobiles.

Other non-regulated Mobile Children’s Service types, such as the multi-strategy Mobile Playsession Services in outer regional to very remote areas, are just a good way to get particular services to a community rather than have the community come to a ‘centre’.

It is about ‘access’ in the non-regulated Mobiles, however, the non-competition principle doesn’t apply as the activities provided are generally not commercially available, such as Mobile Toy Libraries and playsessions.

[b] Cost effectiveness and cost of service delivery

There will never be a centre-based ECEC service on every street corner.

Mobile Children’s Services are provided where there is no reasonable access.

Mobile Children’s Services are a very practical and cost effective means of providing access and an equitable amount of society’s resources to those in isolated circumstances.

**Whilst being cost-effective, Mobile Children's Services are not cheap:
Access, safety, quality and good management have a cost.**

[c] Ecological framework

Mobile Children's Services work within an ecological framework, supporting the development of children within the context of their family and community situations [See Bronfenbrenner, Uri [1979] *The Ecology of Human Development*]

[d] Community engagement

The day to day operation of all services involves the participation of parents. This is particularly so in the Mobile Playsession Services where parents stay at the session and participate in the program. This is a welcome socialising opportunity for parents and also creates the opportunity to learn about and discuss community, child development and parenting issues. The services are important generators/facilitators of social capital in isolated communities. This is a 'village pump'.

[e] Resilient communities and community based management

Most Mobile Children's Services are 'community managed' and were set up through a community development process. Again, community managed services are an important generator of social capital and provide a sound base for the development and maintenance of strong and resilient communities: Decent neighbourhoods for children to grow up in.

[f] Culturally competent

An underlying principle of Mobile Services is that they deliver their service to children in isolated circumstances. This includes the type of isolation presented by cultural difference.

Planning a Mobile Service includes understanding the local communities, their characteristics and needs, whether inner urban refugee communities or Indigenous communities in various places.

Delivering a Mobile Service involves being culturally competent.

In many circumstances, usually determined by funding arrangements, Mobile Services are designated to support particular population groups, such as Indigenous communities.

[iii] Mobile Service strategies

Children, their parents and communities have a range of needs when it comes to early childhood development.

Mobile Children's Services respond to these needs by delivering a range of activities/strategies to their communities. This is why they are 'fit for purpose': Responsive to the circumstances and needs of their stakeholders and flexible in their service delivery.

This responsiveness and flexibility has led to the development of several types of Mobile Children's Service, mostly mirroring their centre-based/come-to-us, counterparts:

- Mobile Preschool/Kinder Services
- Mobile Child Care Services [LDC-ish]
- Mobile Occasional Care Services [Sometimes the term crèche is used for this strategy]
- Mobile in-home/On-farm Care
- Mobile Playsession Services
- Mobile Toy Library Services
- Mobile Out of School Hours Service, especially After School [Usually part of a MCCS]

- Mobile Adjunct Care Services [Community Access Mobile Minder Services][Sometimes the term crèche is used for this type of activity, as well] and
- Often, combinations of different service strategies in the one Mobile Children's Service, particularly in more geographically isolated areas
- Often, one of the above Mobile Service types, but focused on specific population groups such as Indigenous children and communities, children with additional needs or children and their families in difficult circumstances.

[iv] The numbers and coverage

There are about one hundred and forty [140] Mobile Children's Services in Australia identified by NAMS. One hundred and ten of these operate in NSW, as identified by MCSA.

These services work in **hundreds of communities, supporting thousands of children** who would otherwise have **no reasonable access** to an early learning experience or formal education and care.

There will may be scores more Mobile Services in non-NSW states that are funded by state governments, especially those 'playsession' type services that provide parenting support and welfare intervention through 'supported playgroups'. These do not often have a primary ethos underpinned by a focus on the education and care of young children.

[v] More on Regulation

Many Mobile Children's Services are regulated under a state-based system, Mobile Children's Services being out of scope under the NQF. These mirror the operations of their centre-based counterparts: Preschool; Long Day Care and Occasional Care.

There are at least seventy [70] services regulated by state governments, the majority operating in NSW under the *Children's [Education & Care Services] Supplementary Provisions Regulation 2012*. [Sixty].

[vi] More on Funding

Services are funded from a range of sources. As well as Australian and State Government levels, downstream, the funding is provided by different government departments depending on the nature of the 'mobile' strategy, historical accident and the focus population group.

The majority of Mobile Children's Services in Australia are funded by the NSW Department of Education and Communities [DEC] as Mobile Preschools [Fifty]

The Australian Government Department of Education funds approximately fifty [50] Mobiles throughout Australia under the Budget Based Funding Program [BBFP]. The majority of these operate in NSW [16].

Appendix 2: About Mobile Children's Services funded under the Budget Based Funding Program

NAMS counts forty six [46] services as Mobile Children's Services in the Budget Based Funding Program, operating in all states and the Northern Territory and providing a prodigious diversity in the type of activities.

The listing provided by the Department of Education doesn't account for those services that are very large or operate several vehicles in multiple venues. In real terms, this means that there are more than 46 Mobile Service 'projects'.

As expected, most services work in remote and very remote areas.

Still, a significant number work in outer regional areas, the predominant service type being the LDC-ish Mobile Child Care Services, usually supporting more densely populated agricultural areas.

The Mobile Child Care Services need a critical mass of enrolments to be financially viable and this is reflected in where they provide a service: At a nodal point that services a large hinterland.

The majority of services operate in NSW, probably an historical funding issue, with WA having the second highest number.

Many of the Mobile Services in Victoria were only set up in the last 15 years as Mobile Child Care Services/Flexible.

Whilst many BBFP Mobile Services are of one type, some offered several types of activities and were difficult to classify.

South Australia's Remote and Isolated Children's Exercise [RICE] exemplifies an organisation addressing a range of child and parent needs over vast areas, offering a broad range of activities from in-home care to Preschool of the Air to playsessions plus another program that is predominantly *Mobile In-home Care*.

The types of activities generally fall into two groups: Mobile Child Care Services [LDC-ish] of which there were sixteen [16] and twenty one playsession services [21].

As usual, the Mobile Playsession Services provided 'education through play' playgroup as well as a mix of toy library, parent support, early intervention, support of additional needs, adjunct care etc., emphasising the 'honeypot' and 'non-stigmatising access' nature of the playsession strategy as well as their flexibility and responsive to community need.

There are two [2] licensed occasional care services/crèches in Western Australia as well as adjunct care services/crèches [Parents in the 'immediate vicinity' and therefore not licensable]: Much of this unlicensed, creche type of activity is provided by Mobile Playsession Services diversifying their strategies.

There is one [1] dedicated adjunct care service in WA, offering non-licensable care to children whose parent attends a medical clinic or other parent-focused activity.

There are four [4] services offering In-home/On-farm/On-property care in Queensland [Three by RAFS] and South Australia [One by RICE].

Those services operating in the most remote communities provided the greatest diversity of activities under the Mobile Playsession banner.

BBFP Mobile Services are generally universal providers across all population groups and also provide services to Indigenous children and parents as well as to specific Indigenous communities in their area of geographic coverage.

NAMS was unable to discern if any funding was targeted to Indigenous communities as a priority rather than across the broader local community.

To better support these Mobile Children's Services, further research should be undertaken to ascertain the range of activities provided by each service, their geographic area of coverage and the populations groups they formally target or generally service.

There are twenty services [20] that are not licensed or assumed to be not licensed as they do not seem to offer 'care' where the parent is not present or not in the 'immediate vicinity'.

There are twenty six services [26] that are licensed or assumed to be licensed as they offer 'care' when parents are not present. Most of these are the LDC-ish Mobile Child Care Services, with two dedicated Mobile Occasional Care Services [WA] and one dedicated Mobile Preschool Service [Qld]. Several licensed services are Mobile Playsession Services in NSW which are licensed because they '**occasionally**' provide formal care.

Sponsorship varies between council based and community based, including some large state and Australia-wide organisations with affiliation to religious bodies as well as sponsorship by local Aboriginal Corporations, including a few Aboriginal Health Services.

The twenty six licensed Mobile Children's Services in six of the seven states will need extensive support as 'transition to the NQF' proceeds.

All forty six are subject to the reforms to BBFP funding and administration now in place, or to be put in place, over the next few years.

Whilst BBFP funded Mobile Children's Services provide a diversity of activities, there are horses for courses for the different geographic communities: Mobile Child Care Services operating mainly in 'outer regional' and some 'remote' communities where agriculture is more intensive: Play Session and In-home/on-farm in mostly very remote areas, signifying the sparseness of population.

Whilst the BBFP funding review stated that reform was to be within the bounds of current funding, it is clear that there are vast areas of Australia where children, their families and communities do not have reasonable access to an early learning and care experience.

Mobile Services are particularly well placed to increase access, including the extension of the multi-strategy playsession type of service to remoter areas and Mobile Child Care Services to those areas with more intensive agriculture and relatively denser populations.

It should also be noted that the NSW Government funds fifty [50] Mobile Preschools.

Table 1: BBFP Mobile Service by remoteness, State and Licence

Remoteness	No.	NSW	Vic	SA	Qld	NT	WA	Tas
Inner Regional	2	1	1	0	0	0	0	0
Outer Regional	16	8	3	2	1	0	1	1
Remote	12	3	2	1	2	1	3	0
Very Remote	16	<u>4</u>	<u>0</u>	<u>2</u>	<u>4</u>	<u>2</u>	<u>4</u>	<u>0</u>
Total	46	16	6	5	7	3	8	1
Licensed	26	12	5	3	3	0	2	1

Table 2: BBFP Mobile Service by remoteness and predominant Mobile Service type

Remoteness	No	PS	MCCS	MOCS	Mobile In-home	Adjunct	MF	Mobile Preschool	Lic.
Inner Regional	2	1	1	0	0	0	0	0	1
Outer Regional	16	5	9	1	1	0	0	0	13
Remote	12	5	5	1	0	0	0	1	9
Very Remote	16	10	1	0	3	1	1	0	3
Total	46	21	16	2	4	1	1	1	26

Key

PS = Mobile Playsession Service [Some licensed for formal Occasional Care]

MCCS – Mobile Child Care Service [LDC-ish][Licensed]

MOCS – Mobile Occasional Care [Licensed]

Mobile In-home = Care provided on provided on properties and in-homes

Adjunct Care: Supervision provided in immediate vicinity of parents

MF = Multi-function [RICE too hard to categorise]

Preschool – Mobile Preschool [Licensed with focus on 4 year old children]

Table 3: BBFP Mobile Service type by state

Mobile Service type	No.	NSW	Vic	SA	Qld	NT	WA	Tas
Mobile Playsession	21	10	1	1	1	3	5	0
Mobile Child Care	16	6	5	2	2	0	0	1
Mobile Occasional Care	2	0	0	0	0	0	2	0
Mobile In-home Care	4	0	0	1	3	0	0	0
Mobile Preschool	1	0	0	0	1	0	0	0
Multi-function	1	0	0	1	0	0	0	0
Mobile Adjunct Care	1	0	0	0	0	0	1	0
Total	46	16	6	5	7	3	8	1
Licensed	26	12	5	3	3	0	2	1

Appendix 3: Listing of Mobile Children's Services funded under the **Budget Based Funding Program**

Organisation Name	State	City	P'code	Remoteness	Type	Licence
Albury-Wodonga Mobile [CEYC]	VIC	Wodonga	3690	Inner Regional Australia	PS	N
Bega Child Care & Mobile Creche Services	WA	Kalgoorlie	6430	Very Remote Australia	Adjunct	N
Bland Shire Mobile Resource Unit	NSW	West Wyalong	2671	Outer Regional Australia	PS	Y
Bogan Bush Mobile Resource Unit	NSW	Nyngan	2825	Remote Australia	PS	Y
Bourke & District Children's Service	NSW	Bourke	2840	Very Remote Australia	PS	Y
Brewarrina Mobile Resource Van	NSW	Brewarrina	2839	Very Remote Australia	PS	N
Community Early-Years Childcare - Mobile - NSW	NSW	Wodonga	3689	Outer Regional Australia	MCCS	Y
Community Early-Years Childcare - Mobile - Vic	VIC	Wodonga	3689	Outer Regional Australia	MCCS	Y
Corangamite Shire Mobile Child Care	VIC	Camperdown	3260	Outer Regional Australia	MCCS	Y
Cowra Early Childhood Mobile Service	NSW	Cowra	2794	Outer Regional Australia	MCCS	Y
Crookwell Mobile Long Day Care	NSW	Crookwell	2583	Outer Regional Australia?	MCCS	Y
Deniliquin Mobile Children's Service	NSW	Deniliquin	2710	Inner Regional Australia	MCCS	Y
Derby Mobile Playgroup	WA	Derby	6728	Very Remote Australia	PS	N
Fitzroy Valley Mobile Playgroup	WA	Fitzroy Crossing	6765	Very Remote Australia	PS	N
Galloping Gumnut Mobile Playvan	NSW	Lithgow	2790	Outer Regional Australia	PS	N
Gawooleng Yawoodeng Mobile Playgroup	WA	Kunanurra	6743	Remote Australia	PS	N
Gippsland Flexible Child Care Service	VIC	Bairnsdale	3875	Outer Regional Australia	MCCS	Y
Glenmorgan Mobile Service	QLD	Glenmorgan	4422	Remote Australia	Mpres.	Y
Gnowangerup Occasional Care Service (Mobile)	WA	Gnowrangrup	6335	Remote Australia	MOCS	Y
Goondiwindi & District Mobile Children's Service	QLD	Goondiwindi	4390	Remote Australia	MCCS	Y
Goonimoo Mobile Resource Van	NSW	Walgett	2832	Very Remote Australia	PS	Y
Gubi Gabun Childrens Mobile Service	NSW	Armidale	2350	Outer Regional Australia	PS	N
Katherine Isolated Children's Service	NT	Katherine	850	Very Remote Australia	PS	N
Lachlan Mobile Child Care Service	NSW	Condoboin	2877	Remote Australia	MCCS	Y
Mallee Minors Child Care Centre	VIC	Ouyen	3490	Remote Australia	MCCS	Y
Mallee Mobile Childcare Service	SA	Lameroo	5302	Remote Australia	MCCS	Y

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Midlands Rural & Remote Child Care Service	TAS	Longford	7301	Outer Regional Australia	MCCS	Y
Mobile Families as First Teachers - Central Australia	NT	Alice Springs	870	Very Remote Australia	PS	N
Narrogin Multifunctional Child Care Centre Mobile	WA	Narrogin	6312	Outer Regional Australia	MOCS	Y
North Townsville Community Hub	QLD	Deeragun	4818	Outer Regional Australia	PS	N
Outback Childcare SA [RICE]	SA	Port Augusta	5700	Outer Regional Australia?	In-Home	Y
Outback Mobile Resource Unit Inc	NSW	Broken Hill	2880	Remote Australia	PS	Y
Paroo Contact Children's Mobile	NSW	Wanaaring	2840	Very Remote Australia	PS	N
Playgroup Services in APY Lands	SA	Northgate	5085	Very Remote Australia	PS	N
Puggles Mobile Resource Van	NSW	Tumbarumba	2653	Outer Regional Australia	MCCS	Y
R.A.F.S. Charleville	QLD	Charleville	4470	Very Remote Australia	In-Home	N
R.A.F.S. Longreach	QLD	Longreach	4730	Very Remote Australia	In-Home	N
R.A.F.S. Mt Isa-Barkley	QLD	Mount Isa	4825	Very Remote Australia	In-Home	N
Regional Children's Services Network - Jalygurr	WA	Broome	6725	Remote Australia	PS	N
Remote & Isolated Children's Exercise Inc	SA	Port Augusta	5700	Very Remote Australia	MFC	N
Robe Mobile Service - CCOWS	SA	Robe	5276	Outer Regional Australia	MCCS	Y
Smile-A-Mile Fun Bus & Toy Library	NT	Bees Creek	836	Remote Australia	PS	N
St George Mobile Children's Service	QLD	St George	4487	Very Remote Australia	MCCS	Y
Tharawonga Mobile Resource Unit	NSW	North Star	2408	Outer Regional Australia	PS	Y
West Pilbara Mobile Children's Service	WA	South Hedland	6722	Very Remote Australia	PS	N
Wimmera Rural Child Care Service (Innovative)	VIC	Horsham	3400	Remote Australia	MCCS	Y
Key: Predominant service type						
Adjunct = Creched/unlicensed occasional care						
In-home = On property/In-home						
MCCS = Mobile Child Care Services - Licensed						
MFC - Multi-function: RICE = Hard to classify						
MOCS = Mobile Occasional Care Service - Licensed						
PS = Mobile Playsession Service						