

Areas of concern in the Productivity Commission Report

Draft Recommendation 7.4

Governments should develop and incorporate into the National Quality Framework a nationally consistent set of staff ratios and qualifications for those caring for school age children in outside school hours and vacation care services. These requirements should take into consideration ratios that are currently acceptable for children during school hours, the uncertainty surrounding the additional benefits of more staff and higher qualifications, and the valuable contribution that can be made to outside school hours care services by less qualified older workers and university / TAFE students.

The same staff ratios and qualifications should be implemented in all service types including long day care facilities that provide before and after school care. There will be an increased likelihood of an accident occurring with less staff and unqualified staff.

Information request 12.1

Families must have multiple child % dependant on the number of children they have in care. This makes reduction in each child's fees more affordable so that families can return to work.

Draft Recommendation 12.2

The Australian Government should combine the current Child Care Rebate, Child Care Benefit and the Jobs Education and Training Child Care Fee Assistance funding streams to support a single child-based subsidy. To be known as the Early Care and Learning Subsidy (ECLS). ECLS would be available for children attending all mainstream approved ECEC services, whether they are centre-based or home-based.

If there is one ECLS as suggested then the current Child Care Rebate would be means tested which would deter families from seeking care and returning to work. Also some families may choose alternative backyard care where quality education does not play a part in the child's day.

Child care rebate should be paid to services and not the family so it is used for what it was originally intended.

Draft Recommendation 12.4

The Australian Government should fund the Early Care and Learning Subsidy to assist families with the cost of approved centre-based care and home-based care.

The program should:

****determine annually the hourly deemed cost of care (initially using a cost model, moving to a benchmark price within three years) that allows for differences in the cost of supply by age of child and type of care.***

**** support up to 100 hours of care per fortnight for children of families that meet an activity test of 24 hours of work, study or training per fortnight, or are explicitly exempt from the criteria.***

Every child should have access to quality long day care services. Those not meeting the work, study or training test should still be eligible for at least 24 hours or 2 days of care as is the current system. The current 24 hour limit provided to non-working families is just satisfactory in preparing children from birth to 3 ½ for the Kindergarten Program year in Queensland.

Draft Recommendation 12.3

The Australian Government should exempt non-parent primary carers of children, and jobless families where the parents are receiving a Disability Support Pension or a Carer Payment from the activity test. These families should still be subject to the means test applied to other families.

The Grandparenting allowance should still be maintained. These Grandparents have taken on a second family to raise in their elderly years. In many cases it would be very difficult to work fulltime and raise a second family. These grandparents are keeping the children from foster care which has to be beneficial to all involved.

Draft Recommendation 8.5

Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny.

National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services.

Nanny ratios will be similar to the 2016 ratios regulating the Long Day Care Sector for 0-3 years. The CCB/CCR therefore should be paid at the same rate for all service types so price is not the determining factor for care choice, but the focus is on flexibility.

Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.

If CCB was available for the employment of Nannies, they would be scouted from the long day care industry. Our staff are generally trusted and of a standard that families want (already tried and proved). The unemployable, unsuitable qualified workers (who we have encountered seeking work) are neither sort after by Approved Providers or by families wanting nannies.

If Nannies are approved for CCB then the National Quality Framework requirements and assessment processes must be applied to them also. This is not realistic though, as the nation cannot keep up with the current assessment process currently in place.

If Nannies are approved for Child Care Benefit they should receive the same wage per hour or day as Long Day care staff.

Draft Recommendation 12.6

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

The new proposal must have adequate funding to cover the financial burden attached to having an additional needs child integrated into the program so it is safe and equitable. Extra funding must be available to services to access staff and equipment that allow children with additional needs to be a part of the program for the same hours per day as any other child in the Early Childhood Setting. At present the current hourly rate must be increased to cover the wage of a casual adult certificate III level staff member. The current 5 hours a day limit for children in long day care through ISS is not adequate as these children can be left up to 12 hours a day, therefore the limit should be extended to cover the 12 hours. Services caring for additional needs children have to outlay extra wages per hour and sometimes for extended periods of time otherwise the other children in the environment are not receiving equitable care.

Draft Recommendation 12.8

The Australian Government should continue to provide support for children who have a diagnosed disability to access ECEC services, through:

****access to the mainstream ECEC funding on the same basis as children without a disability and up to a 100 percent subsidy for the deemed cost of additional ECEC services, funded from the Special Early Care and Learning Subsidy.***

These children should be charged just as other families are but the funding goes towards the service so these children are mainstreamed equitably within an ECEC environment.

Children with additional needs participating in the funded Kindergarten program in Queensland should be able to access inclusion support funding so the environment is equitable for all children involved and also access the state Kindergarten funding similar to crèche and kindergarten services who currently are able to access both types of funding at the same time.

Draft Recommendation 12.9

The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program of 15 hours per week for 40 weeks per year. This support should be based on the number of children enrolled in state and territory government funded preschool services, including where these are delivered in a long day care service.

The Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool.

Draft Recommendation 12.9 proposes that all the 3.5 age group and older in QLD are expected to attend a school based (Qld) Kindergarten.

Those affected by this move:

Long Day Care Sector with Approved Kindergarten Programs (QLD)

Preschool / Kindergarten in Qld should continue to receive funding in the form that already exists in 2014. If the funding is incorporated into the funding for schools as proposed and schools are encouraged to extend their services to include preschool / Kindergarten (Qld), long day care facilities will lose a large proportion of their older children and will not remain viable, especially when the new National Quality Standards Ratios are fully implemented in 2016. To remain viable, fees would become extremely high and families will question whether it is worth working. Long term this will have a drastic effect on the work force as families with children under 3 seeking care in long day care will have to pay excessive fees for care if the long day care industry manages to survive these changes.

Working Families

Working families who need our service to maintain their working hours past 9am-3pm will more than likely want to participate in the Kindergarten (QLD) program in the Long Day Care Sector and not in the school. Their expectation would be that the Long Day Care service is able to provide a qualified Early Childhood Teacher who would deliver the approved Kindergarten Program and receive before and after care all in the one setting. The suggestion of a 3 ½ year old attending before school care (from 6.30am) and after school care (until 6.30pm) in a school based OSC facility is not desirable. At present families work experiences are stress free because of the quality care given to their child in the Queensland Kindergarten Program within the long day care setting as their child does not need to cope with great change at this young age. Also because of the ratio restrictions and as a consequence extra staff combined with the loss of more than 1/3 of the licensed capacity if 3 ½ year olds go to school resulting in working families with children under 3 years of age paying increased child care fees.

State Government

The state government will spend more money placing the (QLD) approved Kindergarten Program into the school system than leaving it in the long day care sector because of the following:

-Early Childhood Teachers wages paid by Education Queensland are paid at a higher rate than those in the long day care sector under the Children's Services Teacher's Award. There can be up to a \$30 an hour difference in the wage.

-Within the long day care sector the Approved Provider is responsible for paying for the building, the teacher's wages, maintenance, running costs, insurances and resources associated with the program. In the current Qld Approved Kindergarten Program the government contributes a proportionate rate of money that subsidises almost all of the teacher's wage. All operators in the Long Day Care Sector who have been entrusted with the Queensland Government Approved Kindergarten Program are proud of their implementation and delivery of this program.

Information request 6.1

The commission seeks participants' views on impediments to employers providing flexible work arrangements for parents.

Modern Award would need to allow staff to work outside the 6.30-6.30 without accruing penalty rates. Shifts would need to be extended to 10 hours without agreements or repetitive requests for extended hours approval statements.

Draft Recommendation 7.1

****tailor the National Quality Standard to suit different service types – for example, by removing educational and child-based reporting requirements for outside school hours care services.***

This should also be removed for school aged children within the long day care environment who access before and after school care. These programs are for children to relax and have fun while socialising with peers. Having to document these practices takes staff from the children and families are not interested. The same program would be delivered with or without the documentation.

Draft Recommendation 7.2

Requirements for educators in centre-based services should be amended by governments such that:

****all educators working with children aged birth to 36 months are only required to hold at least a certificate III or equivalent***

The current level of qualification within the child care industry and the so called new nanny system should be maintained. By removing the Diploma Educators the child care industry will no longer be an educational service but a babysitting service.

7.2

****the number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.***

This proposal will change the whole role that the Long Day Care Sector plays in education. If as proposed in Draft Recommendation 12.9 the Preschool / Kindergarten children aged 3.5 years are at school services there would be little need for an early childhood teacher at a long day care service and children would ultimately suffer by not accessing sound educational input. This would definitely be the case if staff working with children under 3 only require their Certificate III as stated in this Recommendation. Certificate III staff do not know how to program for an educational program in the early years which is crucial for a developing child under 3 years.

It appears that the draft recommendations are changing Long Day Care Centres from Early Years **Educational** Centres to Nursery Schools for birth to 3 years. With the proposed maternity leave laws long day care will only be responsible for children aged 1-3years.

Draft Recommendation 7.3

Differences in educator-to-child ratios and staff qualification requirements for children under school age across jurisdictions should be eliminated and all jurisdictions should adopt the national requirements.

Agreeably all states and territories should operate with the same qualifications and ratios but the new national staff: child ratios are not practical or viable for affordable care. The ratio that will have the greatest impact is the 24-35mths 1:5 commencing in 2016 in QLD. This is a ridiculously low ratio for this age group and it will affect the

viability of a long day care centre. Queensland's current ratios of 1:6 for 2-3 and 1:8 for 2 ½ -3 yrs is safe and viable as we are implementing it right now without any issues.

The other ratio which is too low is the 36mths-school age being 1:11. This age group works equitably with 1:12. If these children aged 3 ½ years are taken off the long day care sector in Queensland and placed in schools as suggested in Draft Recommendation 12.9, one would expect the schools to implement the same 1:11 ratio as we would be made to implement in 2016. One rule should fit all.

The consequence of reducing this ratio would be higher fees because of extra staff costs. This would be a reason for families to seek alternative unregulated care where children are not safe or educated.

It is concerning that once these 3 ½ year olds move to the school "anything goes" ratio wise and the quality families have grown to expect in the LDC sector will disappear.

However, because of the minimal cost involved and some families have a mindset that school is a superior place, families may choose school over privately owned long day care providers. However, I genuinely do not feel that the schools can replace the caring, family like atmosphere provided in the Long Day Care Sector, where children's needs and education are catered for in a loving and concerned way by qualified early childhood teachers and educators. Also the trust and bond that has been built between families and carers has over the years lead to positive and beneficial outcomes for the children as well as their families. This involves advice on all levels – educational, special needs, referral to other health care professionals, financial, emotional support and friendship. There are many families who need this extra level of help and they are finding it with their trusted Long Day Care Centre Educators, Directors and Providers.

Draft Recommendation 7.12

Local governments should adopt leading regulatory practices in planning for ECEC services. In particular, local governments should:

****use planning and zoning policies to support the co-location of ECEC services with community facilities, especially schools.***

This should be based on a needs basis. In Queensland schools already have numerous long day care centres around them that are set up to provide a quality approved Kindergarten Program for the 3 ½ year old Kindergarten children with a registered Early Childhood Teacher. By taking these children away from the Long Day Care Sector the following outcomes will occur:

Schools

*The schools will have to purchase equipment and renovate buildings to suit this age group.

Early Childhood Teachers

*Unemployment of ECT's in the long day care setting will be on the rise as there would be no need to employ this staff member if this age group is attending school for free.

Long Day Care Providers

*Approved Providers will have to finance redundancy payouts as there would no longer be a need for a specific ECT to implement the Approved Kindergarten Program.

*Viability of services will be in question if this age group is removed from the long day care setting. Centres rely on the older children with staff:child ratios 1:12, to supplement the whole centre's income so fees can be reduced for the younger age groups attending care.

*Stake holders in Long Day Care would seriously consider if their business enterprise is worth the effort when the new National ratios come into force causing additional staff costs and the Kindergarten aged children are likely to be moved to the school system in Queensland. This proposal would inflict a double financial blow to the industry. The industry would have no choice but to increase fees and once again make the industry not viable.

Families

*Without the 3 ½ year old children attending long day care, fees for the younger children with heavily restricted staff:child ratios will be increased quite substantially, to the point where many families may question returning to work because of the long day care costs involved.

*If centres close families will find it more difficult to find quality educational care for their children.

Government

*The Government will need to finance education so the schools can provide this care.

* If LDC centres are no longer viable because of ratio restriction and loss of more than 1/3 of their licensed capacity (children over 3 ½) the consequences to the child care sector would be devastating.

Families now accessing care for children 0 – 4 go to work happily knowing their children are well cared for. Some would seriously consider not returning to work if these centres were not available and affordable. In our area the 2 working parent family is common place. Government needs to consider that the cost invested in the child care industry helps families to continue working and contributing towards the community both financially and socially.

At present the LDC business model in Queensland is a successful one serving the families of the community. Families rely on our professional and helpful approach in the rearing of their children. The Government School System is not equipped for this role.

****use outcomes based regulations to allow services flexibility in the way they comply with planning rules, such as in relation to parking.***

Flexibility is welcome with open arms as long it this rule applies to the private long day care sector and not just the community based centres and the schools.

****not impose regulations that interfere with the operation of the ECEC market, such as by restricting the maximum number of permitted childcare places in a service***

For viability of existing services and the industry, restrictions must still be enforced and assessed on the needs and supply basis in an area.