

NSW Children's Services Forum

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Who we are

The NSW Children's Services Forum consists of NSW state-wide specialist organisations representing or supporting non-profit community based early education and services. These include peak organisations, resource agencies, co-ordinating bodies and large not-for-profit early education and care providers.

Members who support this submission are: Australian Community Children's Services (NSW Branch), CCSA, Community Child Care Co-operative (NSW), Contact Inc, Council of Social Service of NSW (NCOSS), ECA NSW, Ethnic Child Care Family & Community Services Co-operative Ltd, Goodstart Early Learning, Gowrie NSW, KU Children's Services, Mobile Children's Services Association Inc, Montessori Australia Foundation, Network of Community Activities, NSW Family Day Care Association, NSW Local Government Children's Services, Occasional Child Care Australia, SDN Children's Services, and UnitingCare Children's Services.

What is this response?

This response has been made directly to the Productivity Commission Inquiry, but in addition all signatory organisations are including it in their individual organisational responses to the inquiry. Combined, our organisations represent the majority of peak organisations and large providers in the education and care sector in NSW. We hope, in view of this that the Productivity Commission considers these statements within this context.

NSW education and care¹ In NSW around:

- 213,660 children attend long day care services
- 48,370 children use family day care or in-home care services
- 2,780 use occasional care
- 53,000 attend preschools
- 104,420 use outside school hour care services.

There are around:

- 2,600 long day care services
- 167 family day care services and in Home care services
- 2500 outside school hours care services
- 800 community based preschools and 100 NSW Department of Education preschools
- 60 mobile (out of scope of NQF) services (long day care, preschool, occasional care)
- 36 occasional care services

Excluding preschools, 256,000 families use these services.

¹ www.docs.education.gov.au/system/files/doc/other/child_care_early_learning_in_summary_sept_qtr_2013.pdf and www.det.nsw.edu.au/media/downloads/about-us/statistics-and-research/public-reviews-and-enquiries/review-of-nsw-government-funding-for-early-childhood-education/review_nsw_gov_funding_ece.pdf

Overarching Response

We believe that the recommendations in the draft Productivity Commission Inquiry Report will disadvantage NSW children and families.

In particular we are concerned about:

- The possible exclusion of some service types (such as preschools) from the National Quality Framework;
- The removal of tax benefits for not-for profit services who supply a large proportion of the education and care in our state;
- The nebulous streamlining of ratios and qualifications which would mean long standing NSW standards are diminished;
- The introduction of a divide between child 'care' for under 3 years olds and preschool 'education' for over three year olds which undercuts NSW's proud tradition of provision of education and care to all age groups;
- The potential impact of a deemed rate of care on families and services. This may disadvantage those in high cost provision in areas of NSW;
- The lack of provision of a clear planning system to ensure supply of education and care equals demand;
- The possible exclusion of children from vulnerable families to early education by the imposition of the proposed 24 hour work/activity test per fortnight.

To ensure that each child in Australia gets access to a cohesive high quality early and middle education and care system, we believe the Productivity Commission's draft recommendations in the following areas need to change.

1. Draft Recommendation 12.4

- Unless the deemed cost of care takes into account the higher costs of service provision in NSW, caused by higher land costs and long standing higher qualification and ratio requirements, NSW families will face a higher gap fee than families in other states and territories.
- The proposed activity test of 24 hours of work/study training per fortnight will exclude some children from access to early education and care. We believe access should be each child's right.

2. Draft Recommendation 8.5

- Nannies should be linked to an approved service, to ensure quality provision and to ensure they are supported to achieve quality outcomes for children.

3. Draft Recommendation 12.6 and 13.1 and 12.8

- Indigenous focused services currently funded under the Budget Based Funding Program have repeatedly said the child based funding arrangements will not work for their communities. The intention to transition Indigenous services out of the Disadvantaged Communities Program to child based funding arrangements will not work.
- The suggestion that provision of once-off grants to service providers under the Inclusion Support Program could substitute for the support and guidance provided by Inclusion Support Facilitators employed by Inclusion Support Agencies is concerning. Services need ongoing support and assistance to include children with additional needs namely children with disabilities, indigenous, CALD and remote and isolated into mainstream services.

4. Draft Recommendation 12.5

- All children, regardless of geographic location, should have the right to access education and care. By only allowing viability subsidies for 3 out of every 7 years, some children will miss out. A service that closes in a time of low demand will not be available to children that do access it and will not be able to re-establish when demand increases.

5. Draft Recommendation 12.9

- Don't incorporate funding for preschools in school funding. Preschool education should always be funded transparently so the money flows to preschool services.

6. Draft Recommendation 5.1

- This recommendation doesn't take into account parental choice and circumstances and is unfairly punitive in NSW where there is an undersupply of services providing preschool education.

7. Draft recommendation 7.9

- This recommendation creates a division in the system which the NQF was going to ameliorate – it provides two tiers of early education, that within the NQF and that outside.

8. Draft recommendation 8.1

- This recommendation would not guarantee the provision of quality of care to preschool children in the absences of ratios and qualification requirements specifically designed for preschool children in a mixed age setting. The capacity of out of school hours care services to deliver quality care to a majority of children of preschool age would need to be underwritten by regulatory requirements and would not longer constitute an Outside School Hours Care Service.

9. Draft Recommendation 8.2

- There needs to be a planning model for the provision of out of school hours care – directing schools to deliver education and care will not work without planning as to where those services are required.

10. Draft Recommendation 8.6

- The removal of a functioning model of early education and care provision –in home care – will not increase the supply of education and care. Families using in-home care should remain eligible for subsidies and in-home care services should be bought into the NQF.

11. Draft Recommendation 9.1

- Families using community based preschools in NSW need access to the Registered Care CCB because this is the only way they can reduce the cost of preschool in NSW. As preschool fees in NSW are exceptionally high the removal of this subsidy would disproportionately affect NSW families using education and care.

12. Draft Recommendations 10.1, 12.1 and 12.11

- Not for-profit providers of education and care in NSW make up a large proportion of providers, especially of preschool, family day care and out of school care services. 30% of long day care is also provided by this group. Removal of the limited tax concessions available would severely hamper the ability of some organisations to continue service provision.

13. Draft Recommendation 7.8

- The NQF should not be tailored towards each education and care type. The needs of different service types are currently recognised through the NQF. There are problems with interpretation of the Regulations and Standards by individual state and territory regulators in so far as how these should be interpreted within the context of different service types, but this is not a problem with the NQS or the Regulations per se.

14. Draft Recommendation 7.1

- Until all service types have been through the NQF there should not be any removal of standards or elements. Consistency and the amount of change fatigue in the sector demand this.

15. Draft Recommendation 7.2

- It is impossible to separate out education from care. Babies learn from every care interaction, Babies need as high, if not higher access to early education and to qualified early childhood teachers as preschool children. Early education and the benefits it provides to children accrue from the moment a child accesses it. We must ensure that the highest quality possible education and care is provided.

16. Draft Recommendation 7.3

- NSW has historically had better regulatory requirements for education and care than other states and territories. These should not be weakened in the name of national consistency.

17. Draft recommendation 7.5

- Likewise the requirements for employing staff with or working towards a qualification should not be removed in NSW. Services have never been able to operate in NSW without meeting required ratio and qualification requirements at all times. This should not be changed.

18. Draft Recommendation 7.6

- Existing ways of determining ratings should remain until all services have been rated and assessed.