



Childcare and Early Childhood Learning  
Productivity Commission  
GP Box 1428  
CANBERRA CITY ACT 2601

To Who It May Concern

**Submission to the Productivity Commission public inquiry into future options for childcare and early childhood learning.**

Thank you for the opportunity to provide a submission to the Productivity Commissions public inquiry into future options for childcare and early childhood learning.

Queanbeyan Family Day Care is run by Queanbeyan City Council and has been providing childcare in the Queanbeyan and surrounding area for the last 34 years. The scheme currently has 43 self employed educators registered with the scheme providing childcare for more than 200 children. The scheme employs 2.46 FTE fully qualified staff members to oversee, monitor and resource educators and families; and to ensure compliance with legislative requirements, and 1.0 FTE casual administration staff to support the operation of the coordination unit.

Queanbeyan Family Day Care operates under the National Quality Framework for Early Childhood Education and Care (NQF); incorporating national regulations, quality and qualification standards, educational frameworks and an assessment and ratings process. The scheme provides eligible parents access to the Federal Government Child Care Benefit (CCB) and Child Care Rebate (CCR) subsidies.

The scheme provides flexible education and care to children in small group settings, and is regulated under the Education and Care Services National Law and Regulations, and therefore meets the requirements defined in the National Quality Standards.

Educators registered with Queanbeyan Family Day Care hold one of the following qualifications: Bachelor of Education (Early Childhood); Diploma in Children's Services (or equivalent); Certificate III in Children Services (or equivalent) or are undertaking studies in a Cert III in Children's Services.

Similarly, staff members employed with the service hold relevant qualifications as defined in the National Regulations and Law.

Queanbeyan Family Day Care is committed to ensuring a high quality of care is provided to all children in the scheme and provides the following information to the Productivity Commission (PC) with the hope that this information will be beneficial to the outcome of this review.

The scheme is disappointed by the failure of the Productivity Commission's draft report on child care to recognise the capacity of Family Day Care to be expanded to meet the need for alternative forms of home-based care. Family Day Care has a proven ability to provide flexible and affordable home based child care options for working Australian families.

Unfortunately, in recommending significant changes to home based care arrangements the report has overlooked existing structures within Family Day Care that are ideally placed to support and administer new models including nannies. In fact it would be a natural step to take in the progression of the childcare industry.

Such a model would propose that if nannies are to be included under a streamlined child care subsidy as recommended by the PC, that they be registered with an approved Family Day Care service that can monitor and provide support to ensure all regulatory requirements are met.

There is an increasing need from families for flexible, accessible and affordable child care options and it is important to investigate different options, with quality at the forefront of all Australian child care options.

Queanbeyan Family Day Care was visited by three staff members working with the Productivity Commission on 3 March 2014. The Nominated Supervisor of the scheme met these three people at an educator's home and she stated that it was apparent during this visit, that they had limited information about the operations of Family Day Care.

For ease of reference, the rest of this report has been broken down into five key areas which are areas of significant concern.

## **Funding**

Queanbeyan Family Day Care relies heavily on the Community Support Programme (CSP) to operate a quality childcare service to parents and families living in the Queanbeyan and surrounding area. The CSP assists the scheme to keep fees at an affordable and competitive rate enabling parents to access childcare.

The CSP funding is used to support FDC services with the ongoing, day to day costs of delivering quality, affordable child care. Queanbeyan FDC Coordination Unit then supports educators to provide high quality, flexible home-based education and care. This direct support of coordination units is imperative, as they recruit, train and support educators, monitor educators to ensure adherence to legislative requirements, provide professional development opportunities and implement continuous improvement strategies. In addition, coordination units provide advice

and information to families in both selecting an educator for their child/children, and in supporting educators to meet both the family and the child's ongoing needs.

Without CSP funding, services such as Queanbeyan Family Day Care will have no option but to pass on the additional costs directly in families and in some cases, there may be a reduction in service or the scheme may cease to operate. Funding should be directed towards approved services that are licensed and required to comply with quality guidelines, rather than parent subsidies.

Greater expenditure in early childhood education and care by the Australian Government must occur in order to provide the best possible learning and developmental outcomes for children. In addition, funding support for mandatory qualifications (Certificate III and Diploma in Children's Services) for registered carers would support the provision of in home care that is of suitable quality.

Child Care Benefit and Child Care Rebate systems should be amalgamated into a more accessible, equitable and transparent system. The current system is difficult and cumbersome for parents. It needs to be simplified, consolidated and hence rendered more transparent and effective.

Deemed cost of care should not discriminate against forms of childcare. Family Day Care meets the same requirements as other forms of childcare and should not be subjected to a lower deemed cost of care. Over the years Family Day Care has worked very hard to meet the same requirements as centre-based childcare and educators working in Family Day Care are highly qualified.

### **Access and Equity**

Family Day Care is well placed to cater for children with high additional needs, children from disadvantaged backgrounds, and children living in rural and remote areas. In many situations, the small group size, low child to educator ratios, home environment settings, and individualised programming, makes Family Day Care the ideal childcare option for a significant number of families.

Again, greater levels of support (including financial funding) are required to promote increased participation and to assist services to adequately cater for these needs, through the Inclusion and Professional Support Program and more specifically through the Inclusion Support Subsidy.

The proposal to limit access to child care fee assistance through a parental activity test may preclude some families from being able to access childcare and this may have a negative impact on children of parents who do not meet the activity test.

The system of approval for the ISS is cumbersome and many children are not meeting the guidelines, meaning that children are being disadvantaged. The eligibility criteria has become increasingly restrictive, which has rendered a significant number of children (who had previously had approval to access ISS) unable to continue accessing the subsidy. This can impact on the ability of educators to provide care to children with additional needs, as the subsidy is often crucial to

ongoing sustainability due to educators being unable to care for the full number of children allowed under state regulations.

There can be an excessive amount of 'red tape' for ISS applicants, which is a barrier to those initially applying and is particularly obstructive to reapplication for funding for those children with unchanging diagnosed additional needs.

Family Day Care services should be incorporated into the Universal Access program where approved services and educators can show they are delivering a pre-school program, or directly facilitating access to a pre-school program

For quality ECEC to be universally accessible, it must be affordable. CSP funding needs to be maintained, if not increased, to ensure that childcare remains affordable.

### **Alternate Models of Education and Care**

The provision of Australian Government funding for alternate forms of education and care which meet families' disparate and changing needs, must be subject to the regulatory structures and quality standards established under the National Quality Framework. The overriding aim of all service types should be the provision of high quality care and education to Australia's children to ensure excellent developmental outcomes.

To this end, flexibility in the Family Day Care model of service provision should be explored, and the implications and impacts of Family Day Care provision in locations outside of an educator's own home be further examined.

Family Day Care approved services are the most appropriate existing structure by which the provision of any home-based care model could be delivered, including nannies, au pairs.

### **Quality and the National Quality Framework**

Queanbeyan Family Day Care supports the retention of the fundamental elements of the National Quality Framework (NQF) for Early Childhood Education and Care, as they provide a sound platform for the integration of care and education with a defined focus on quality outcomes for children. However, the implementation of the NQF has had significant impact upon the sectors' administrative workload, with particular impact upon educators who find the increase in administrative activities burdensome, in that it takes up time which they feel could be better spent with the children in their care. Therefore, additional research should be undertaken to minimise the administrative impact of the NQF, on both approved services and educators.

There is a significant amount of duplication in the National Quality Standards and this needs to be addressed. There are also a number of other areas contained in the National Standards which do not directly relate to the quality of the care being provided.

## **Flexibility**

Currently, the provision of non-standard hours of care (early starts, late finishes, weekend and overnight care) is an option offered by Queanbeyan Family Day Care educators. This flexibility to offer care outside of normal working hours assists members of the community who would not normally be able to access such childcare.

Family Day Care also provides families flexibility in the choice of hours that they use. They are not required to contract for a full days care, but can agree to a smaller number of hours.

If you would like further clarification on any of the above information, please contact Ms Narelle Pumphrey, Supervisor, Queanbeyan Family Day Care

Yours sincerely

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