



## **Family Day Care Educators Association NSW Inc.** **Productivity Commission submission**

### About the Association

Family Day Care Educators Association NSW Inc. was formed in 1987 by Educators (then Carers) to resource and support fellow Educators in NSW. The Association aims to develop and foster Educator perspectives within family day care at state and national levels and to support each other to ensure the best outcomes for the children in our care.

The Association's constitutional objectives are to:

- Promote Family Day Care as a quality childcare choice
- Inform and support Educators in their endeavour to provide quality childcare
- Develop a network of communication between Family Day Care Educators in NSW
- Promote cooperation and communication between Educators, staff of coordination units, operators and parents
- Liaise with government and non-government agencies
- Provide a forum for the views of Educators

### About Family Day Care – Nationally (FDCA Website)

- Family Day Care has operated for over 35 years.
- Over 80,000\* families use family day care.
- Over 125,000\* children are enrolled in family day care.
- There are over 18,000\*\* family day care educators.
- There are over 450\* family day care coordination units.
- Family day care is the major provider of regulated, flexible, non-standard hours child care.

\* DEEWR Sept 2012 Update

\*\* FDCA membership

### About Family Day Care Educators (FDCA Website)

Family day care educators are approved, early childhood education and care professionals who engage in the principles and practices of the Early Years Learning Framework (EYLF) and work within the requirements of the National Quality Framework.

Educators provide a safe educational environment for children by meeting the following requirements:

- Hold or be actively working towards a Certificate III level education and care qualification.
- Meet national standards which include maintaining quality learning programs, safe and hygienic learning environments, record keeping and qualifications.
- Maintain current first aid and CPR certificates and training in the emergency management of asthma and anaphylaxis.
- Maintain a clearance for working with children.
- Participate in regular support and monitoring visits conducted by their coordination unit.
- Attend training, meetings and workshops periodically to maintain currency of skills and knowledge.
- Maintain current public liability insurance coverage.

About In-Home Care (National In-Home Care Association website):

It was through the "greater flexibility and choice in childcare" element of the Australian governments Stronger Families and Community Strategy, announced by the Prime Minister in April 2000, which included making in-home childcare available to families in special circumstances.

Funded by the Australian government for almost 9 years In-Home Care is a flexible form of child care where the care is provided in the child's home by an approved carer (educator).

To ensure quality outcomes for children the care is monitored and supported by an approved agency (Service Provider).

In home care is not available to everyone, but limited to families who have no access to existing child care services, and/or their circumstances mean that an existing child care service cannot meet their needs, and where the family meets one or more of the following criteria:

- the child has, or lives with another child who has an illness or a disability;
- the child's guardian (or guardian's partner) has an illness or disability that affects their ability to care for the child;
- the child lives in a rural or remote area;
- the work hours of the child's guardian (or guardian's partner) are hours when no other approved child care service is available;
- the child's guardian (or guardian's partner) is caring for three or more children who have not yet started school.

There are 5,730 children attending In-Home Care across Australia (Department of Education 2013 National ECEC Workforce Census).

Submission Focus

This submission will focus, from a Family Day Care perspective, on the Australian Government's objectives as noted on Page 2 of the Terms of Reference of the Australian Government's Productivity Commission Childcare and Early Childhood Learning Public Inquiry:

*"The Australian Government's objectives in commissioning this Inquiry are to examine and identify future options for a child care and early childhood learning system that:*

- supports workforce participation, particularly for women*
- addresses children's learning and development needs, including the transition to schooling*
- is more flexible to suit the needs of families, including families with non-standard work hours, disadvantaged children, and regional families*
- is based on appropriate and fiscally sustainable funding arrangements that better support flexible, affordable and accessible quality child care and early childhood learning. "*

Objective 1 - *A child care and early childhood learning system that supports workforce participation, particularly for women:*

There over 18,000 Family Day Care Educators (FDCA) and 14,500 Co-ordination Unit Staff (Department of Education 2013 National ECEC Workforce Census) who are mostly women (97.2%, Department of Education 2013 National ECEC Workforce Census) actively participating in the Australian workforce by ensuring that 134,036 children (Department of Education 2013 National ECEC Workforce Census) from over 80,000 families (DEEWR Sept

2012 Update) are receiving quality education and care outcomes whilst enabling the parents of these children to also participate in the Australian workforce.

*Objective 2 - A child care and early childhood learning system that addresses children's learning and development needs, including the transition to schooling*

Family Day Care like other ECEC services falls under the jurisdiction of ACECQA and in NSW under the Department of Education and Communities and is already providing a high quality child care and early childhood learning system that addresses children's learning and development needs, including the transition to schooling. All Family Day Care Educators work under and are required to meet all requirements of the National Quality Framework (NQF) including adherence to the National Regulations, the Early Years Learning Framework and National Quality Assessment & Ratings System. Family Day Care Educators are required to have Certificate III and 32% (Department of Education 2013 National ECEC Workforce Census) have a Diploma or higher qualifications with another 21.8% (Department of Education 2013 National ECEC Workforce Census) studying for a qualification, the majority of whom are studying for a Diploma or higher qualification. Family Day Care Educators are also supported and supervised by highly qualified ECEC staff and children in Family Day Care services have access to transition to school programs provided by Educators and/or Co-ordination Unit Staff.

*Objective 3 - A child care and early childhood learning system that is more flexible to suit the needs of families, including families with non-standard work hours, disadvantaged children, and regional families:*

Family Day Care is a flexible child care and early childhood learning system that can and does provide children with education and care 24 hours a day, 7 days a week thereby meeting the needs of families who work non-standard hours – almost 50% of Family Day care Educators work 41+ hours per week. (Department of Education 2013 National ECEC Workforce Census)

*Objective 4 - A child care and early childhood learning system that is based on appropriate and fiscally sustainable funding arrangements that better support flexible, affordable and accessible quality child care and early childhood learning.*

Family Day Care Educators Assn NSW recognises that the current Community Support Program is no longer sustainable, however this is due to the number of Services that have been allowed to set up without any demonstration of understanding how the CSP funding is to be used, what the requirements of the NQF are, and whether or not there was an unmet demand for childcare and/or Educators in the area in which there were setting up. Many of these new Services have set up by attracting Educators and families from existing Services rather than meeting an unmet demand. It is noted that there have been some strategies implemented to address these issues, however it is too little too late and many long established Family Day Care Services with a long history of providing high quality ECEC are now faced with an uncertain future.

It is very difficult to understand why the Australian Government would not support, build and expand on these long established Services that are already meeting all four of the Australian Government's Objectives for a child care and early childhood learning system and that meets all requirements of the NQF including:

- Adherence to the National Regulations and National Quality A & R System:
- The provision of high quality ECEC provided by qualified educators who are supported by highly qualified staff
- The provision of 24 hour ECEC
- The provision of ECEC in rural and remote areas

- The provision of high quality ECEC that is flexible, affordable and accessible

Instead it seems that the Government plans to further dismantle Family Day Care - Family Day Care has already been greatly affected by the reduction in Educator to child ratios, with both Educators and Services losing 20% of their income, administration fees for educators and families having to increase, and now in addition to this, severely restricting CSP funding, completely abandoning In Home Care and establishing a new Childcare system that as stated above will provide the services that Family Day Care and In Home Care are already providing.

This proposal instead of enabling more women to join the workforce will result in an increased number of women forced out of the workforce because they have had to close their Family Day Care businesses or because of the closure of these businesses - in the case of Co-ordination Unit Staff they no longer have a job or in the case of families they no longer have access to childcare, childcare that is high quality, flexible, affordable, provides for children aged 0-12years, for children with additional needs, and for children from disadvantaged families and from low income families. Our most needy children (and their families) will become invisible until they are required to start school, will miss out on early intervention and support and will cost the Government more in the long term – “Research supports the economic argument that investing in the early years will benefit not only children but all of society in the long run. For every \$1 spent on early learning for disadvantaged children, \$17 was saved by the time they were 40.”

Additional comments re some of the Draft Report’s Recommendations:

- **Draft recommendation 12.2:**

*The Australian Government should combine the current Child Care Benefit, Child Care Rebate and the Jobs Education and Training Child Care Fee Assistance funding streams to support a single child-care 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.*

There is support for this recommendation providing there is an extra provision for "special circumstances" at a capped duration (similar to SCCB) and that ECLS is not restricted to working families and there is provision for children from vulnerable and disadvantaged families.

- **Draft recommendation 12.6:**

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

There is support for this recommendation with a proviso that a simpler application process than the current ISS/ISP is implemented and there are additional measures rather than just tier 1 and tier 2, including access to additional subsidies for therapies in the care environment as required by the child’s diagnosis.

- **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 towards 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 currently present for family day care services.***

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

This recommendation could only be supported if Nannies were required to be registered with an Approved Provider and meet all requirements including assessments as do Family Day Care and In-Home Care Educators

- **Draft recommendation 8.4:**

***The Government should remove caps on the number of occasional care places;***

Possibly, if there was a demonstrated unmet demand for childcare in a specific area

- **Draft recommendation 8.6:**

***The Australian Government should remove the In-home care category of approved care, once nannies have been brought into the approved care system.***

It is difficult to understand why an established child care system would be removed and replaced with another system that is essentially the same. Suggestion: Nannies be brought into the approved care system by registering with an established Approved In-Home Care or Family Day Care Provider thereby providing those Approved Services with another service that would assist families whose child care needs cannot be met by existing services.

- **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.....***

There is support for this recommendation with the proviso that universal access is extended to Family Day Care Services who have staff with the required qualification and who can demonstrate the ability to meet the criteria and to Educators who hold the required qualification and who choose to run a pre-school based program in an in-home environment (catering solely for the preschool age range)

- **Draft recommendation 7.8:**

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

There is support for this recommendation with an emphasis on the National Quality Framework requirements being tailored towards each care type – that is recognition that Family Day Care is very different to centre based care

- **Draft recommendation 7.1**

***To simplify the National Quality Standard, governments and ACECQA should:***

- ***identify elements and standards of the National Quality Standard that can be removed or altered while maintaining quality outcomes for children***
- ***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***

With maintaining quality outcomes for children at the forefront of any changes, there is support for this recommendation. An example is one provided by FDCAQ during their presentation at the Productivity Commission hearing in Sydney in relation to observations – in Family Day Care it is the one person with a small group of children all day, so the observations recorded by a Family Day Care Educator will be very different to a staff member in a room with 25 children who hands over/takes over from another staff member.

### Closing Comments

Family Day Care Educators Association NSW proposes that:

- Additional not less funding should be provided to the early childhood education and care sector, specifically to Family Day Care. Methods to assist with this include the proposed measure of diverting funds from the Government's Paid Parental Leave Scheme and closer scrutiny of the use of funding to ensure that it is used correctly for the intended purpose of operating a Service.
- The Family Assistance Law and the interpretation re managing fee setting be reviewed.
- A system be set up to alert Approved Providers about educators who have been de-registered/dismissed from a Service for a serious misdemeanour prior to being able to be registered/employed with another Service.
- The terminology "Working towards" be reviewed to better reflect the nature of that standard. Currently "Working towards" applies to a Service that has failed to meet only one element as well as a Service that has failed to meet a number of elements.