

Ms Wendy Craik AM
Commissioner
Productivity Commission Childcare and Early Childhood Learning
Locked Bag 2, Collins St East
Melbourne VIC 8003

September 5th, 2014

Dear Ms Craik

Productivity Commission
Childcare and Early Childhood Learning Draft Report
SUBMISSION YMCA Brisbane Child Care Services

The YMCA of Brisbane is pleased to submit our response to the Productivity Commission Draft Report into Childcare and Early Childhood Learning that was released by the Productivity Commission (PC) on the 22 July 2014.

The YMCA of Brisbane acknowledges the size and scope of this enquiry is significant, and congratulate you the body of work done to date. We also acknowledge it has been a significant time since there has been a comprehensive audit that considers all elements of the child care sector e.g. cost, quality, care type.

We need to ensure child care policies go far enough to fully support the aspirations and fundamental need to return to work of working women. The most important assurance we need to give to mothers is the flexibility to return to work with the confidence of knowing their baby or child is being well cared for whether it be in the family home under Home Childcare, or in an Early Child Learning Centre.

The YMCA of Brisbane has in particular valued the acknowledgement that we need to give more support to families with special needs children, and protect the vulnerable and 'at risk' children through the repackaging of the Special Childcare Benefit (SCCB) into the Special Early Care and Learning subsidy (SELCS).

While we see many positive inclusions in the report, as you would expect with a review of this size, we do believe there are some areas of the report we do not support, or feel need to be considered further.

The YMCA of Brisbane currently manages the following suite of child care services:

- Outside School Hours Care
- Family Day Care
- Long Day Care
- In Home Care
- Vacation Care

Overview of concerns:

In reading the report, we have been left feeling less than confident the importance of the investment of these funds into child care. The broader positive impacts of this investment into child care subsidy is more than purely assisting families with the cost of child care. This investment goes further to support the state of our economy through stronger participation of, majorly women, in the workforce. It is an investment into the positive learning outcomes for children setting them up to achieve better lifelong outcomes. The National Quality Framework, and the Early Years Learning Framework have established a National Standard to ensure our children receive quality education programs delivered by qualified educators.

We are also concerned that the Productivity Commission's draft report on child care in the most part fails to recognise the value and capacity of Family Day Care and In Home Care in the current Child Care system. It makes limited reference or recognition to the fact that Family Day Care is the preferred care choice for families with children under 2 years of age. It is the only child care sector that legitimately provides care for evenings, overnight and weekend care.

Below please find our response to your recommendations found in the Productivity Commission Draft Report into Childcare and Early Childhood Learning.

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.

Response

We recommend In Home Care be the approved program to bring nannies into the sector. In Home Care has made a significant contribution to Home Based child care and has been efficiently providing this form of care for more than 10 years to more than 50,000 children.

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.

Response

The assumption is that a single child-based subsidy should make it easier for families to access their rebates, and ease administration burdens. It should also support equity and access by families to their benefits, with improved accountability and transparency.

This recommendation is supported as long as care is taken to not discard or lose any existing family benefits in the process causing undue hardship to families, in particular vulnerable families who already struggle to budget for the cost of child care.

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:

- **assist with the cost of ECEC services that satisfy requirements of the National Quality Framework**

Response

We support the above recommendation.

- **provide a means tested subsidy rate between 90 per cent and 30 per cent of the deemed cost of care for hours of care for which the provider charges**

Response

The maximum of 90% ECLS only being paid on deemed cost of care could place families in hardship dependent on the particular child care program they are accessing. For example, this will be a significant issue in Family Day Care, In Home Care, the proposed nanny program, or the grandparent/registered provider

- **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**

Response

The Family Day Care sector has been heavily impacted with the removal of the Community Support Program funding. The deemed cost of care calculation in the report for Family Day Care has either not taken into consideration this change in policy, or is grossly miscalculated.

In the report it has estimated the deemed care of cost 13/14 to be \$7.53 per hour in Long Day Care, and \$6.84 per hour in Family Day Care. A difference of .69 cents. This is the same level of funding paid through to the Community Support Program to support the Family Day Care Approved Services functions in ensuring the recruitment, assessment and training of appropriate qualified educators, who are self-employed and contracted to care for children in their home. The service is also responsible for the monitoring of quality child care, and educational leadership in the implementation of the National Quality Framework. We recommend the deemed cost of care needs to be at least the same as Long Day Care, and feel there is an argument it should be set slightly higher.

Family Day Care educators can only care for up to 4 children under 4 years of age, and a maximum of 7 children. Educators in Family Day Care need to gain Cert 111 qualifications, and accept all costs associated with ensuring their homes meet all legislative requirements to be approved to provide child care in their home. They also need to carry the cost of their own professional indemnity and income protection insurance, RWC for their vehicles, blue cards, and medical clearance and cover their own superannuation and holiday provisions. Educators need to supply their own toys, games, arts and craft resources. These are costs either not needed or are provided by the employer in a Long Day Care Centre.

Educators in the majority are just as qualified as educators in Long Day Care and Outside School Hours Care and deserve to be remunerated accordingly. If the deemed cost of care is not increased, this cost will need to be passed onto families, creating a larger gap fee impacting on affordability to many families.

Approximately 90% of the care provided to families in Family Day Care is for babies to 3 year olds. Families with very young children have a preference to place their children in a home environment, rather than centre based care. We believe the Long Day Care sector would struggle to meet the demand for care if Family Day Care were to become unaffordable to families. We also believe this is a contradiction to the goals of the Productivity Commission in seeking more flexible care choices for families.

We cannot recommend enough the Productivity Commission supporting the recommendation to increase the deemed cost of care in Family Day Care as a critical response to support the viability of the sector.

- **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**

Response

The Activity Test seems to assume anyone not looking for work can afford to pay full fees. However there are many middle/low income earners who for various reasons may not return to the workforce, and need financial support to afford child care. Dependent on their income, there may be no financial benefit in returning to the workforce, or they have made a choice in the best interest for their family to stay at home with their children. We should be supporting this decision, this choice. However, it will still be important that children have access to early education programs and develop social skills. Parents are the first and best educators of their children. If they wish to place their children in care there should be some flexibility and assistance with fees. The removal of the 50% out of pocket rebate, and no subsidy will make accessing childcare and Kindergarten programs financially inaccessible. The 24 hours a fortnight should also be increased to 30 hours consistent with the Kindergarten Program.

- **pay the assessed subsidy directly to the service provider of the parents' choice on receipt of the record of care provided.**

Response

Agree, this will be of benefit for LDC and OSHC providers. However not in the case of Family Day Care. Payment is usually made directly between the educator and the parent. We are also finding families are choosing to have the CCR rebate paid directly to them. With the loss of the Community Support Program operational funding, Family Day Care will be more vulnerable. The Productivity Commission report has failed to comment or realise the impact on the sector. We recommend the Productivity Commission does further work to understand and support to develop recommendations to government on how to ensure the sustainability of this sector. We also recommended the extension of the Community Support Program funding for a further 12 months to allow the sector to undertake this work of identifying a new business model.

DRAFT FINDING 12.1

It is unclear that the proposed changes to the Paid Parent Leave scheme would bring significant additional benefits to the broader community beyond those occurring under the existing scheme. There may be merit, therefore, in diverting some funding from the proposed new scheme to ECEC to ensure that the Government's workforce participation objectives are met and ECEC services to additional needs children are adequately funded.

Response

The scheme is very generous, we would support some of the monetary amount being scaled back and directed to child care. We believe the priority is to support choice for parents, so they can care for their children in the way that suits them best.

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.

Response

In theory we support the above recommendation. The main concern is to ensure there are no gaps between the different levels of Government in regard to children at risk. We agree to an extent that families should still be means tested, however considerations should be made in regard to affordability for people on any form of permanent pension.

INFORMATION REQUEST 13.1

The Commission seeks information and advice on the costs and risks involved in the transition to the proposed new funding arrangements for mainstream services (including home-based care providers paying for the services of coordinators) and advice on how these costs can be minimised and risks managed

Response

*For child care other than home based care the main issue will be ensuring families stay abreast of the changes. Once there is clarity on the changes, the Government will need to allow legitimate timeframes so **their** offices have the appropriate time to get their systems in place, and to communicate with families about the new entitlements. There have been historical problems with the CCMS system and their staffs lack knowledge when you contact them with a question. Often software providers know more than CCMS staff.*

For home based care, as long as CCMS is still paid to the approved service this will respond to the majority of the issue. Services will then need to ensure fees paid by families to educators are somehow processed through the service.

INFORMATION REQUEST 12.3

The Commission seeks information on who is using ECEC services on a regular basis but working below the current activity test of 15 hours per week, or not actively looking for work or undertaking work, study or training. Views are sought on the activity test that should be applied, how it could be implemented simply, and whether some means tested access to subsidised care that is not subject to an activity test should be retained. If some subsidised care without an activity test is desirable, for how many hours a week should it be available, what should the eligibility criteria be, and what are the benefits to the community?

Response

In our Family Day Care and OSHC Services there is very minimal use by families for non-working related care. However, this is different in our Long Day Care Services. For example one of our Long Day Care Services has 20% of their families as non-work related. This is usually 15 hours per week for children mainly attending the Kindergarten Program. The centre is in a low socio economic community. The area rates as a high needs community in relation to the Australian Early Development Census. Community agencies including our child care centre have worked hard to connect with vulnerable families. These communities include refugees, ATSI and long term welfare dependent families, often with parents with very low or no literacy skills. It is critical in breaking the cycle of poverty and lifelong learning barriers, that the eligibility criteria remain broad enough to ensure children have access to early education programs.

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Response

As discussed above, we would support up to 30 hours per fortnight without the activity test being applied. It would be a shame to lose this early intervention opportunity with these families. We often observe positive through puts with parents enrolling in language classes, engaging in volunteering or programs or if possible return to work programs.

We also believe that when vulnerable children have access to ECEC services there should always be back up/collaboration from Child Safety officers as staff in ECEC services usually do not have social work degrees etc. Children from a vulnerable family usually have many problems and a holistic approach is required. Child care cares and educates the child – more involvement from other sources is needed for families who are at risk and who do not meet the activity test.

INFORMATION REQUEST 12.5

The Commission seeks information on the impact that removing the current free access of up to 50 hours a week to ECEC services for eligible grandparents will have on them and the children for whom they care.

Response

If they are in the kinship program they will be receiving some financial support for caring for their grandchildren. It is reasonable for there to be the same means testing in place as not all grandparents are retired and on the pension. Those that are on the aged pension, it should be free. If a grandparent is the full time provider of child care, and receive the child care rebate they do need to have the appropriate qualifications.

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.

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

Response

Our recommendation is for any potential nanny to be approved and assessed as part of the In Home Care Program. Any person providing care in the home needs to go through the appropriate assessment process to ensure they are fit and proper people to be caring for children.

We do not believe the expectation that the responsibility of monitoring care falls with the regulatory authorities. These departments are already struggling to meet the demands of their workload. The importance on consistent monitoring, support and training has not been considered. We recommended this is done by a certified supervisor being a part of an approved In Home Care Service.

In Home Care, which is currently a capped service is well positioned to be able to expand its services to deliver child care in the family home. It is the most obvious program to extend child care choices for families for the following reasons;

- ✓ In Home Care Services are already attached to an Approved Provider.
- ✓ The sector is in readiness to be a part of the NQF.
- ✓ Most In Home Care services work alongside FDC and have already adopted the policies, practices and qualifications.
- ✓ It is of paramount importance that the monitoring of care, assessment of the family home as a place of work, training and support is provided to the In Home Care Educator.
- ✓ Matching of qualifications to meet the individual needs of children is in place. For example, In Home Care provides care to children with a disability, educators may have other qualifications such as nursing or disability. This is an important consideration for this area of child care, and a matrix already in place in In Home Care.

What this means in terms of funding and resources for training and professional development?

- ✓ Retain current operational funding for In Home Care through the Community Support Program in relation to families with high care needs and cannot access mainstream services.
- ✓ Often families accessing In Home Care will have children with additional needs, or 3 or more children under 4. Deemed cost of care may need to have a matrix developed to allow for variations re 1 child very high needs, opposed to a family with 4 children and more practical to have care provided in the home.
- ✓ Currently ISA's determine the level of extra funding both in FDC and IHC
- ✓ Dependent of the needs of the child, appropriate access to training and resources will need to be provided to the educator to meet the needs of the child/ren in care.

Additional concerns and issues that need consideration?

- ✓ We need to make sure we are very clear that placing an educator in the family home is for the purpose of providing early education programs to their children, not to clean their house or prepare their meals.
- ✓ It's to ensure these children are provided opportunities to attend playgroups, and social inclusion activities so they are not disadvantaged with starting school
- ✓ The service needs to be attached to an Approved Service so that the educators have the educational leaders supporting them in the development of their programs, reflection and learning milestones for children. Especially if they only have a Cert 111 in Child Care, or Cert in Disability Services.
- ✓ Recognition of the skills of some educators caring for a child with high support needs. We have some educators who have nursing backgrounds due to the high needs of the child in care.

DRAFT RECOMMENDATION 12.6

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

- The Special Early Care and Learning Subsidy would fund the deemed cost of meeting additional needs for those children who are assessed as eligible for the subsidy. This includes funding a means tested proportion of the deemed cost of mainstream services and the 'top-up' deemed cost of delivering services to specific groups of children based on their needs, notably children assessed as at risk, and children with a diagnosed disability.
- The Disadvantaged Communities Program would block fund providers, in full or in part, to deliver services to specific highly disadvantaged community groups, most notably Indigenous children. This program is to be designed to transition recipients to child-based funding arrangements wherever possible. This program would also fund coordination activities in integrated services where ECEC is the major element.

Response

We agree with the intention of the above recommendation, however it is not clear what funding arrangements are in place to provide a qualified response. We do know that if this were to align to the Community Support Funding guidelines, the capacity of services to attract any of this funding if they support disadvantaged communities in metropolitan areas is negligible, as it requires the service to have this as the majority of its business area. Virtually no metropolitan services can access the Community Support Program Funding.

- The Inclusion Support Program would provide once-off grants to ECEC providers to build the capacity to provide services to additional needs children. This can include modifications to facilities and equipment and training for staff to meet the needs of children with a disability, Indigenous children, and other children from culturally and linguistically diverse backgrounds

Response

The provision of the once-off funding for as described above does not work for the following reasons;

- *Training and development of staff. Staff leave.*
- *The needs of children attending a service can change and are broad.*

Once off funding will only support the children in care now, not those that will come into care in the future. Funding needs to be provided in a continuum for training and development for staff with access to resources, equipment and support. The Inclusion Support Agencies need to be properly funded so services can access quality support when needed for children with additional needs, CALD and ATSI. The ISA's funding has been grossly eroded, and the support they can provide is too limited.

Case in point, in our OSHC program we have opted to employ an Inclusion Support Co-ordinator to support our services with assessing the resource and training needs of services when including a child/ren with additional needs. Assisting with the onerous application process for funding for additional support workers. This was done because ISA's do not have adequate staffing to meet services demand.

Consideration needs to be made to increase the maximum ratios when OSHC services are including children with additional needs. Currently we can only place one additional Inclusion support worker per 15 children in care.

However, the additional support needs of children vary. This coupled with the gap between the subsidy paid and actual cost of wages at times make services unviable. If we did not have a number of surplus to profit services, and our commitment to inclusion we would possibly find ways to not accept these children into care.

Theoretically speaking most services should be wheel chair and disability compliant. However, if there are centres / facilities in community based (not for profit) organisations that need building modification, we support this recommendation on a case by case basis as to who should be responsible to the modifications.

In relation to our In Home Care and Family Day Care programs, funding is currently given directly to the Educator in recognition of the additional work, training and resources that the Educator requires. The FDC/IHC services do not receive any payment for the additional administration work required to meet the conditions of this funding. Given the proposed withdrawal of the Community Support Program funding to our FDC service , it is concerning that services need to expend this time without additional payment and may opt not to take children with additional needs, CALD and ATSI due to the high admin time around the portal work and support to Educators required around this.

INFORMATION REQUEST 12.7

The Commission seeks views on the best way to allocate a fixed funding pool to support the ECEC access of children with additional needs and deliver the greatest community benefit. This includes views on the best option for allocating the Special Early Care and Learning Subsidy payments for children with disabilities to ensure that the program enables as many children with disabilities as possible to access mainstream ECEC services.

Response

The Commission needs to consider that mainstream inclusion (while perfect in theory) has been ineffective for many families. The YMCA of Brisbane runs a Specialist Outside School Hours Care service at Aspley Special School. This program has been open only 12 months and has 80 families enrolled with the program who can highlight to the commission the difficulties they have faced accessing mainstream ECEC services. This includes families who are caring for teenagers and families who are caring for primary-aged children.

YMCA Aspley Specialist OSHC cannot access the Inclusion and Professional Support Program (IPSP) because the service is included 'exclusive', despite the fact that the majority of our young people have been excluded from numerous other OSHC settings and have found the only place they can be included is within our setting. The productivity commission needs to reevaluate the definition of 'inclusion' and reflect on whether or not the Special Early Care and Learning Subsidy payments will maintain the same definition as the IPSP program. The YMCA of Brisbane recommends that the definition of Inclusion is extended to include Specialist OSHC settings.

For more information on Specialist OSHC please access the following reports:

- *The YMCA of Brisbane OSHC are producing an Action Research Project through the National Out of School Hours Association (NOSHSA). This will be published publically later in the year.*
- *Courage Partners (2011). Scoping study for Specialist afterschool and vacation care support. Accessed from: http://www.dhcs.act.gov.au/data/assets/pdf_file/0019/240517/Scoping_Study_Afterschool_and_Vacation_Care.pdf*
- *Courage Partners (2011). Final Report: Evaluation of Outside School Hours Care for Teenagers with Disability Project. Accessed from: www.dss.gov.au/sites/default/files/.../outside_sch_hours_finaleval.doc*

The government should determine how an ECEC service can become a provider for respite under the National Disability Insurance Scheme.

The program should create a national scheme for caring for children with medical difficulties. At the moment if a child has a physical medical disability it is not covered by the IPSP guidelines and it is up to the State Governments to invest. It is unfair that a family would receive a different amount of support for care of their children on a daily basis if they were born in a different State.

To support services to more actively include children with disabilities and/or additional support needs we recommend the following:

- ✓ *The subsidy rate needs to be in line with the actual wages paid to employ the additional worker in the child care setting (not applicable to FDC & IHC)*
- ✓ *Remove the maximum number of additional staff to child ratio in services, it acts as a barriers to include children with additional needs into care.*
- ✓ *The employment of additional staff needs to be based against the individual needs of the child needing care, and what is needed to ensure their positive inclusion into the program, the safety and well-being of all children into care, and any resources needed to support this.*
- ✓ *Reduce the barriers to gain approval with easier approval guidelines, in particular if a child has a severe lifelong disability, the parent should not have to get medical evidence to repeatedly demonstrate this.*
- ✓ *The paperwork for staff is onerous as many LDC services will not take on a child because of the paperwork involved. There are many cases where a child with a disability will always have the disability and often as the child grows that disability becomes more difficult to manage.*
- ✓ *Seek to fund programs for children with high needs, where it is not in the best interest of the child to attend a main stream care setting, to support these families to participate in work and community life strengthening their ability to support their child in a more loving and supportive way. Quality of life – everyone deserve the same right to this.*

DRAFT RECOMMENDATION 12.7

The Australian Government should continue to provide support for children who are assessed as ‘at risk’ to access ECEC services, providing:

- **a 100 per cent subsidy for the deemed cost of ECEC services, which includes any additional ‘special’ services at their deemed cost, funded from the Special Early Care and Learning Subsidy program**
- **up to 100 hours a fortnight, regardless of whether the families meet an activity test**
- **support for initially 13 weeks then, after assessment by the relevant state or territory department and approval by the Department of Human Services, for up to 26 weeks.**

ECEC providers must contact the state or territory department with responsibility for child protection within one week of providing a service to any child on whose behalf they apply for the ‘at risk’ Special Early Care and Learning Subsidy. Continuation of access to the subsidy is to be based on assessment by this department, assignment of a case worker, and approval by the Department of Human Services. The Australian Government should review the adequacy of the program budget to meet reasonable need annually

Response

*We agree with the above recommendation, overall it is consistent with current practice. The only difference that we can see is the up to 26 weeks, is this final? In some ways this would be fine as this will **not allow** families to use this funding longer than the 26 weeks, giving better guidelines for child care services to manage,*

DRAFT RECOMMENDATION 5.2

Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged

Response

We fully support this recommendation. The government should use information currently available to them on funding models and structures. For example the Strengthening Families Communities for Children Program.

We recommend;

- *undertake an audit of what already exists in regard to family support programs, e.g. Early Years Centres, Communities for Children to ensure no duplication of existing services.*
- *That the placement of services in based on the needs of a community, if the needs have changed, reassess where these resources should be located*

We also recommend government consider the placement of integrated services in new and emerging communities that have a high proportion of families with young children. Taking a proactive and holistic approach to support better outcomes in the future for these communities. For example Springfield Lakes in the South West Corridor between Brisbane and Ipswich is a relatively new Delfin community with over 20,000 residence, a very high proportion of families with young children with limited local services and support to these families.

Recommend using existing long term established reputable services for the expansion and for the implementation of new services. These services have developed strong community networks and should be the first choice and be a better financial option as they already have many resources in place.

communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

INFORMATION REQUEST 8.2

The Commission is seeking feedback on the role that integrated services can play in making ECEC more accessible for families. In particular, the Commission is interested in:

- **the extent to which integrating ECEC services with other family services and schools will deliver benefits to families and/or ECEC providers, and in particular, Indigenous and potentially other disadvantaged communities**
- **views on the best way to fund integrated services that provide ECEC, including whether child-based funding would be an appropriate funding model**
- **how funding could be apportioned across activities operating within an integrated service, including for the coordination of services, the management of administrative data and an evaluation of outcomes.**

Response

We agree traditionally child care services have worked in isolation, focussing on the delivery of child care. The National Quality Framework has been good in including this as an element of the Standard to validate the importance of Child Care working with other key agencies in their local community to support families.

There has been some excellent work done in this area of work the Government could draw upon to inform any further guidelines to fund an integrated service system. For example, Communities for Children initiative base in the South West Corridor of Brisbane. The Communities for Children (CfC) is an early intervention and prevention program that aims to improve the development, health and wellbeing of children aged 12 and under by addressing local needs and encouraging community participation. The approach to supporting children and families is collaborative and targeted. Several organisations work together to start local children on a positive path and build a stronger, safer community through services.

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.

Response

Yes and NO. Support National consistency and that the 1:15 ratio is adequate. However recommend taking care when reducing qualifications and for further work be done to develop a qualification matrix that can be used nationally to set a consistent set of standards. Seek input from Peak bodies on this, again using this as a platform on discussions already held.

It is acknowledged that at times it can be difficult to recruit workers with the appropriate qualifications, however we also do not want to see the sector water down qualification expectations. Further work on identification of related qualifications / experience could be developed. We recommend educators should be required to be working towards a Certificate qualification directly relating to OSHC. Services should be expected to demonstrate that on their OSHC team they have a good mix of direct and related qualifications/experience to care for School Aged children.

A reduction in ratios, irrespective of qualifications will always push up cost of care.

Caring for school aged children comes with complexity, and is not always an easy age group when providing care. The service is also impacted by the value the school places on the OSHC service, and the capacity of the program to support good outcomes for children. Children in care have to manage multiple care environments, valuing the importance of sharing this care of the child and working together is pivotal in identifying when a child is slipping thru the cracks and needs support. This requires a high level of knowledge and expertise of our educators to pick up on these indicators, and how to work with the family and school to support the child. Educators need to have a broad range of skills to support children in regard to social skills, self-esteem, self-awareness, sport and recreational activities. There is also the skills and expertise in regard to the inclusion of children with behavioural and special needs, and cultural sensitivity.

DRAFT RECOMMENDATION 8.1

The Australian Government should ensure that the requirement (currently contained within the Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Determination 2000) for most children attending an outside school hours care service to be of school age, is removed and not carried over into any new legislation.

Response

We believe there is merit in this recommendation. It would be good if teenagers who graduate to be able to access OSHC over the holidays until their post-school programs start in February of the following

DRAFT RECOMMENDATION 8.2

State and territory governments should direct all schools to take responsibility for organising the provision of an outside school hours care service for their students (including students in attached preschools), where demand is sufficiently large for a service to be viable.

Response

Absolutely. As long as there is enough demand for a service. Also, the school understands the importance of providing access to appropriate spaces to deliver the program. There should be an application/tendering process on the selection of a service. We would also suggest a review of the P&C not needing to demonstrate they have the appropriate skills to manage an OSHC in the same way as OSHC Providers.

The benefits include better outcomes for children of working families. Utilisation of the school facilities often dormant after hours. Positive returns and partnerships that benefit the school. The capacity for parents to be able to fully engage in workforce opportunities.

DRAFT RECOMMENDATION 10.1

In line with the broad level recommendations of the Productivity Commission's 2010 study into the Contribution of the Not for Profit Sector, the Australian Government should remove eligibility of not-for-profit ECEC providers to Fringe Benefit Tax exemptions and rebates.

State and territory governments should remove eligibility of all not-for-profit childcare providers to payroll tax exemptions. If governments choose to retain some assistance, eligibility for a payroll tax exemption should be restricted to childcare activities where it can be clearly demonstrated that the activity would otherwise be unviable and the provider has no potential commercial competitors

Response

As indicated in the report, not for profit organisations tend to compete in the market through the provision of higher quality services, which comes at a dollar cost. I suggest they leave any benefits to the NFP alone, as they all go back into the community, whether it is directly into the child care business, or back to an identified need in the community.

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.

Response

We support this recommendation as long as it is done to ensure no loss in the integrity of the assessment and rating process. For example the capacity of a service to demonstrate learning outcomes in a Long Day Care Centre opposed to a Vacation Care Program running 2 weeks is vastly different. The Assessment and Rating process should have the capacity to report and rate in context with impacting the overall rating of the service.

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 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.**

Response

We do not support the recommendation that having a higher qualification than the Cert 111 is only applied for the care of children over 36 months.

Care providers and early childhood educators are able to be more positive and responsive to children when they are directly responsible for fewer children. The educational qualifications held by early childhood workers also contribute to the quality of care. Those with higher qualification levels and standards of training are better equipped to provide improved learning environments. In particular, high quality early childhood education and care can significantly improve outcomes for disadvantaged children. The attendance of disadvantaged children at high quality services is associated with increased participation and retention in education, positive social behaviours in school and in later life and higher educational achievement'. Early Childhood Development Steering Committee (2009) Policy Overview: Regulation Impact Statement for Early Childhood Education and Care Quality Reforms, July. Viewed at:

http://www.coag.gov.au/sites/default/files/policy_overview_RIS_early_childhood_development.pdf

The first 3 years of a child life are the most important for brain development. Cert 111 is an entry point qualification. We need to ensure the Group Leader in a Long Day Care setting holds or is working towards Diploma qualifications. This should only be acceptable if other Group Leaders / Director in the centre hold Diploma qualification. This higher level of skill and expertise is essential in supporting families to identify any developmental issues very early in a child's life to develop an appropriate responsive. This ability to do this is tied to expertise and experience.

Educators need access within their team of this additional expertise. This is an important consideration when looking at the Family Day Care, In Home Care, or proposed Nannie Program –which we hope will be included into In Home Care.

Home Based educators work in isolation, and currently only need the Cert 111, even though many educators in FDC & IHC services hold Diploma qualifications. It is vital they can access the support and expertise of more qualified staff regarding the provision of quality early education programs tailored to the needs of the children in their care. Without the support of the Co-ordination Unit staff, often with extensive experience in child care, they are left working in isolation.

We again draw to the attention of the Productivity Commission the vital role the Coordination Service has in the delivery of quality home based child care and the current risk this sector is experiencing due to the removal of the Community Support Program Funding.

DRAFT RECOMMENDATION 7.5

To provide services with greater flexibility to meet staffing requirements, ACECQA should:

- remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months
- Explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.

All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.

The New South Wales and South Australian Governments should allow a three month probationary hiring period in which unqualified staff may be included in staff ratios before beginning a qualification, as was recently adopted in all other jurisdictions.

Response

We do not support the recommendation of lessening of current qualification requirement for children under 3 years of age, and argue that the Group Leaders must hold or be working toward a Diploma level qualification in Child Care

We also believe the employer has the capacity to put in place the correct interview/induction processes, supervision and monitoring of care. This is part of the Standard 4, and forms part of the Assessment and Rating Process.

We are supportive of reducing barriers to the recognition of overseas qualifications. Again, the employer should be expected to demonstrate this through their recruitment processes. We do not support services being able to operate under ratio. This move will open up the opportunity for abuse. Unless there is a critical incident placing priority of the safety and wellbeing of a child.

We support the recommendation of being able to engage unqualified staff and count them in ratio for three months until they begin their qualification. However, we recommend they are not left alone in the supervision of children.

Conclusion

We agree with the decision made to undertake this enquiry by The Productivity Commission, and agree when you say we need a new Early Childhood environment for Australian families who are trying to cope with a system that was designed for another age. YMCA of Brisbane believes we need to work collectively to create a child care sector that offers families flexible care options they can afford, and recognises the strides made in developing a highly professionalised sector to ensure quality educational and care outcomes for children.

We look forward to seeing the final report from the Productivity Commission, which will be presented to the Government in October 2014.