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The National Voice of Policing

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Childcare and Early Childhood Learning  
Productivity Commission  
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### **CHILDCARE AND EARLY CHILDHOOD LEARNING DRAFT REPORT**

The Police Federation of Australia (PFA) welcomes the opportunity to make a further response by way of a submission to the *Productivity Commissions Childcare and Early Childhood Learning Draft Report* released on the 22<sup>nd</sup> of July 2014. The PFA also thanks the Productivity Commission for allowing us to present our case at the public hearing into *Childcare and Early Childhood Learning* on the 26<sup>th</sup> of August in Canberra.

The PFA is the national body representing the professional and industrial interests of Australia's 58,000 police officers, across all jurisdictions, with almost 99% membership density. The PFA is a federally registered organisation under the Fair Work (Registered Organisations) Act 2009.

In a previous submission to the *Productivity Commissions Childcare and Early Childhood Learning Inquiry* submitted on the 3<sup>rd</sup> of February 2014, the PFA outlined the necessity of a more; flexible, accessible and affordable model of childcare to allow policing families to better balance their unique working commitments with the demands of raising a family.

The PFA would like to use this second response to reiterate the unique nature of policing work. Policing requires complete commitment 24hrs a day, 7 days a week, for 365 days of every year. This is true of some other emergency services and shift work industries, but there is an unpredictability faced by police that is not faced by any other type of worker in Australia.

The unpredictable nature of police work, the irregular hours and risks involved in carrying out a valuable service to the community, places high demands on individuals and their families. The pressure police face, working frequent extra hours or overtime, is well documented in *The Police at Work Report*<sup>1</sup> (a survey conducted by the University of Sydney for the PFA). According to this study "almost one third (31%) of police officers feel burned out by their work". Policing work is challenging and this is especially the case when both parents are shift workers struggling to juggle day and night shifts with the care of their children.

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<sup>1</sup> Police at Work, Wave 5 Report p5

Police forces are losing valuable officers because in addition to the stresses and strains of the job, progressive solutions to flexibility within the workplace and childcare do not exist for many police families. With more than half of all police officers having dependent children, 32,828 recorded in the 2011 Census<sup>2</sup>, this is no small issue. Alongside this figure, it is the PFA's view that women officers are not returning to front line policing due to difficulties accessing appropriate forms of childcare and this remains a considerable barrier to workforce participation for women (Attachment A). In addition to the loss of skills, knowledge and experience women bring to frontline policing there is the considerable cost to both State and Federal Governments through recurring costs of training at approximately \$150,000 an officer.

In the context of the above the PFA is compelled to respond to the *Childcare and Early Childhood Learning Draft Report* and will discuss the following subjects:

- **Affordability** - 'Deemed cost' of Early Childhood Education Care (ECEC) Services
- **Flexibility** - Work force participation
- **Accessibility** - Universal access to preschool and early childhood learning programmes

The above 3 points will be followed by a series of recommendations to conclude this submission.

## **Affordability**

Police pay a premium for childcare services in order to guarantee the flexibility they need to balance their demanding non-standard work schedules with care for their children. To illustrate the situation for police, three police family scenarios are provided below.

### **Scenario 1:**

*Both parents are members of the NSW Police service. One parent is a 4<sup>th</sup> year Constable shift worker the other parent is a 4<sup>th</sup> year Senior Constable shift worker. They have a 4 year old and a 2 year old child and utilise an inner city Sydney long day care centre during the day at a cost of \$128 per day per child for 16 days per month. The couple also use in-home care (at a cost of \$25 per hour) during evening shifts when neither partner is available to provide care for their children. The weekly amount that they pay for centre based childcare is \$512 (after the 50% CCR). For in-home care the cost fluctuates depending on their requirements but on average they would utilise this form of care 6 evenings per month. The couple pay between \$300 (12hours) and \$600 (24hrs) a week for in-home care. This places the couple's childcare bill in the range of \$812-\$1112 a week.*

*Using a combination of long day care and in-home care provides the couple with the necessary flexibility they require, but it comes at an additional financial cost. The couple's shifts do not fit conventional day care hours, nor are they necessarily fixed via a recurring roster this means that they end up paying for days at the long day care centre which they do not use and require additional in-home care for nonstandard hours which is a very expensive option.*

*The couple also worry about their children's education and would like their eldest child to attend an independent preschool of their choice. The day care centre that their children attend was decided upon purely on availability. With demand for childcare in inner city Sydney being so great, they were left no option but to secure the first place they were offered.*

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<sup>2</sup> Australian Bureau of Statistics 2011 Census of Population and Housing

Under the new means tested model recommended in the *Productivity Commission Draft Report* the couple above would be financially worse off. Their combined family income which would include their base daily salary rates and additional income earned through working overtime and shift work would push their income into the higher income spectrum (Fig.9 p32 of the report), sharply reducing any Early Care and Learning (ECLS) subsidy.

#### **Scenario 2:**

*Both parents are members of the Queensland Police Service and are stationed in a rural town in Queensland, they have two children aged 4 and 8 months. One parent is a Senior Constable with operation shift allowance (OSA) (an allowance in lieu of shift penalties). The other parent is also a Senior Constable but has had to reduce her hours to part time .6 FTE as the family cannot access additional child care, she is required to work shift work including afternoons, nights and weekends. They have 2 days care a week for their children at the local LDC at a cost of \$95 a day for the 8 month old and \$86 a day for the four year old. Their current total out of pocket cost for care is \$9421pa (after CCB 50%).*

Under the new means tested model this family's total income would be assessed over \$160,000 p.a. This family would only receive a rebate of \$7517, resulting in them being approximately \$2000 worse off annually.

#### **Scenario 3:**

*One parent is a Detective Sergeant and the second parent is employed in construction. They live in Brisbane and have three children aged 18 months, 3 and 7. Due to the shift work and the long hours worked they use a combination of LDC, OSCH and a nanny. The two youngest attend a LDC facility 4 days per week costing \$724 per week. They reach the CCR cap after 40 weeks. Their eldest daughter attends OSCH 3 days per week at a cost of \$105. They also require the assistance of a nanny and average 10 hours per month at a total cost of \$200 a month, this places their total out of pocket cost for childcare each year at \$27,778 (after the CCR payment).*

With a total family income at \$265,000 pa, under the new proposal this family would receive \$14670 in ECEC. Their total out of pocket costs for childcare would rise to \$30,890. Despite being entitled to the additional subsidy for the nanny, they would be worse off paying an additional \$3112 in out of pocket expenses per annum for childcare.

#### **Flexibility**

Female participation in the police service is extremely low compared to national figures for most other occupations and there is evidence that women in particular are sacrificing their careers in policing in order to manage childcare responsibilities. The number of sworn female police officers nationally as at 30 June 2013 was just over 16,000 or 27%<sup>3</sup>.

For many occupations part time work is a viable solution to balance work life and family life. The reality of flexible working arrangements and policing is fraught with difficulty. The right to request flexible working arrangements under the Australian Government's Fair Work Act 2009 and National Employment Standards does not extend to the majority of police, due to states not referring industrial powers to the Commonwealth. The Commonwealth could have created federal law setting a higher standard than the State. For example, using the foreign affairs powers and elimination of discrimination to create a uniform 'right to request'.

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<sup>3</sup> 2012/13 Police Department/Service Annual Reports

However, an obligation on employers to provide flexible working arrangements in the context of policing will always be sub-servient to the requirement to deliver 24/7 service to the community.

Please refer to Confidential Attachment B for a personal account of the direct impact the lack of flexible child care, combined with the unique working patterns of front line policing has had on one police family.

Data drawn from *The Police Association of New South Wales Part Time Workers Survey* found that 90% of women who worked part time in the police service chose to do so to provide care for their children. Further to this, more than a third (37%) changed duty type to do this and three quarters (75%) thought working part time had reduced their access to training opportunities, relieving and promotional opportunities. A further 20% considered resigning as an option rather than part time work to meet their carer's responsibilities (Attachment A).

Policing is an essential service. The Australian Government should ensure that essential services are delivered across the country by an experienced and diverse workforce. Women are very much needed in a police service, particularly in the area of emergency response to vulnerable persons in the community. This is in line with the Federal Government's development of *The National Plan to Reduce Violence against Women and their Children 2010-2022*. The PFA advocates the introduction of a police specific childcare top-up subsidy to encourage women back into frontline policing after having children, increasing workforce participation of parents/carers and particularly women. Frontline policing cannot afford to lose women.

## **Accessibility**

Another unique aspect of policing is that its workforce is not concentrated around one site but dispersed across the state/country. For example, there are over 300 work locations in Victoria alone. This means policing is diffused which presents a unique challenge in linking the childcare services that may offer flexible access to child care on an ongoing basis and limits the ECEC services delivered to police families. In addition, this limits the capacity of employers to offer any meaningful employer provided child care.

The round-the-clock demands of policing mean that police require childcare outside the standard 9-5 hours. The PFA recognises that childcare centres need to accommodate different working patterns such as extended hours, occasional care and rotating shifts without compromising on the quality of care and education provided.

The PFA acknowledges that making the places of children who are on an extended absence available to other children on a short-term basis (Information Request 8.3 p48) and removing caps on the number of occasional care places (Draft Recommendation 8.4 p47), could potentially be helpful to police.

In order to encourage services to provide more flexible practices and patterns the PFA believes the Australian Government should ensure that childcare service providers have access to assistance to build capacity to provide ECEC for essential services like police. This will ensure that the children of police do not miss out on universal access to quality early childhood learning programmes essential to transitioning to school and later education.

## **Recommendations**

### **Recommendation 1.**

Those members of the Police with childcare responsibilities should not be unfairly financially penalised for carrying out the vital community service they do. Their need to access more flexible childcare arrangements than the average worker should not further disadvantage them. The PFA therefore recommends that the Productivity Commission consider a *special provision* for Police regarding childcare rebates, which ensures that means testing of household income is based on base salary rates only.

### **Recommendation 2.**

We welcome approved nannies becoming an eligible service for which families can receive ECEC assistance. However, due to the necessity of police to access more flexible childcare arrangements than the average worker (eg nannies) they should not be further disadvantaged due to the higher costs they will incur in accessing such flexible arrangements. We believe there is a case for a police specific “top up” subsidy.

### **Recommendation 3.**

The PFA recommends increasing the ‘deemed cost’ across all types of care due to concerns that the ‘deemed cost’ calculated using a median in the report is too low.

The PFA believes the arrived at figure does not take into consideration the lack of choice parents face in finding an affordable and flexible childcare provider. Many police face inflexible working schedules and are not covered by Fair Work National Standards of Employment. They have much less control over their working patterns compared to other occupations, leading many to pay an above average price for childcare.

### **Recommendation 4**

That the children of police receive the same access to a range of high quality ECEC services, including preschool, as any other child in the community might. Children of shift working parents should not be disadvantaged in any way by their parents need to work unsociable hours protecting the community we live in. Despite the COAG commitment to ‘universal access’ to pre-school, we are concerned that the children of police could be disadvantaged at a very early age due to their parent’s occupation.

### **Recommendation 5**

In order to encourage services to provide more flexible practices and patterns the Australian Government should ensure that childcare service providers have access to assistance to build capacity to provide ECEC for essential services like police.

### **Recommendation 6**

That the Australian Government engage with the police employers with a view to encourage greater female participation particularly encouraging women back into frontline policing after having children.

Policing requires a complete commitment 24 hours a day, 7 days a week, for 365 days a year, it does not take a break on weekends or public holidays, it is essential that police are able to access the flexible and affordable models of childcare they need to do their jobs. It is vital that women in particular are encouraged back into frontline policing after having children and are valued and supported to do so. Childcare should not be a barrier to female participation. Australian communities deserve and expect frontline policing services that reflect the communities in which they serve, especially as it applies to gender and parental responsibilities. Policing parents and their children should not be disadvantaged by the non-standard working patterns required by police.

The PFA would be happy to provide further information if that was required.

Sincerely yours

Mark Burgess  
Chief Executive Officer