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Response to the Productivity Commission's *Draft Report on Childcare and Early Childhood Learning*

05 September 2014

To be submitted by email to: childcare@pc.gov.au

To the Productivity Commission,

Mobile Children's Services Association (MCSA) response is to be read as an addition to the NSW Children's Services Forum response (attached) and in particular focuses on items relevant to mobile children's services.

Mobile children's services are a variety of service types such as preschools, long day care and occasional care, which are delivered from temporary and varied locations across NSW – particularly in rural and remote settings. The aim is that children and their families and communities in isolated circumstances have access to affordable, high quality education and care.

In particular, MCSA would like to highlight the following -

- MCSA found that there was little reference to the mobile services throughout the submission, and even less reference to those services outside preschools such as mobile toy libraries; mobile playgroups and community access mobile minders (CAMMS) services. These services provide a valuable welfare and community connections for families living in rural and remote settings and it is useful for The Commission to keep them in mind. They provide a valuable and flexible service to these remote communities – providing their early childhood education and care experiences that would otherwise be lost. As well, they are used as a stepping stone to pre-school and other EC services and are often the first port of call for early intervention.
- MCSA believes that some clarification of “disadvantage” is important – does it encompass just geographical isolation or is it meant in its broadest terms such as including social, cultural, financial, religious and so on.
- While attracting, training and retaining quality early childhood staff in rural and remote settings is difficult, MCSA rejects The Commission's recommendation that the maximum qualification for educators of children under three years be the Certificate III. This would greatly diminish the expectation of quality education and care to these children. MCSA does not support the separation of “care” and “education” in the report.



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- Services are seeing au pairs to look after children in very remote settings without proper checks and processes and MCSA supports that au pairs need to have at least a Certificate III (or overseas equivalent) to work in these settings to protect them as much as the family.
- MCSA supports that there should be some flexibility and inclusion in the “deemed cost” rural that takes into account the additional costs of delivering a service in rural and remote settings, as well as the viability issues. The limited time limits proposed in the report are of some concern and further clarification from The Commission is sought.
- The Commission has not looked at supply side measures such as funding the establishment of new not-for-profit services, in particular mobile services and particularly in rural and remote settings – this would benefit more children from disadvantaged and lower socio-economic backgrounds entering care.
- MCSA is concerned about having a two-tiered system of early education if some services are inside the NQF and others are outside it.
- Changes in access to CCB would disproportionately affect families in rural and remote settings in NSW as fees would increase substantially. As well, removal of the limited tax concessions would lead to some mobiles being unviable to operate. Stamp duty alone on vehicles and insurance alone would lead to the closure of many remote services.

MCSA agrees that we should be upholding the standards in the NQF and continue to ensure there is universal access to quality education and care to all Australian children.

Regards,

Rebecca O’Sullivan

On behalf of the Mobile Children’s Services Association Inc

Please also see attached: NSW Children’s Services Forum response