



Feedback for the Australian Government Productivity Commission Childcare and Early Childhood Learning Draft Report - September 2014.

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DRAFT RECOMMENDATION 7.6

Governments and ACECQA should:

- *urgently reconsider the design of the assessment and ratings system, giving particular consideration to finding ways to increase the pace of assessments*
- *explore ways to determine services' ratings so they are more reflective of overall quality*
- *abolish the 'Excellent' rating, so that 'Exceeding National Quality Standard' is the highest achievable rating.*

Yes, yes and yes

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.

All child care service that receives funding from the government either as part of a funding agreement of if families receive child care benefit then that service should be required to work under the National Quality Framework.

Parents should be confident that the quality of care between child care services are regulated and assesses.

DRAFT FINDING 8.1

Funding to providers has an important role to play in improving accessibility to ECEC for children with additional needs, or who live in locations without access to ECEC. There is scope to improve current programs which deliver assistance directly to providers:

- *the Community Support Program has not achieved one of its main objectives of improving access to ECEC services in rural and remote areas. Further, it is unclear whether it has been effective in bringing ECEC services to disadvantaged areas where they would otherwise not have been provided.*

I believe that Family Day Care Educators who are located in Inner/Outer Regional areas of Australia provide an important role in providing care for children with additional needs. Most Family day care services/educators have close working relations with services in their local area and are therefore well placed to have children referred to them (either with or without additional needs). Family Day Care is the logical choice of child care for regional/rural areas because of its flexibility as families can be transient due to employment opportunities and seasonal work.

To continue funding Family Day Care in these areas is vital to ensure that services are still available to offer care to children with additional needs.

I am unable to comment as to the effectiveness of services in Rural areas.

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.

Having an after school program attached to a school is a logical option for children and families – infrastructure such as playgroups, indoor space, child friendly facilities are already in place, children do not have to walk or travel to a different location after school. I believe that this could be a very positive option which would benefit families and children in most areas.

For outer regional and remote areas where the number of children requiring after school care may be limited, an afterschool program offered on the school site by a Family Day Care Educator has proven to be most effective in the service that I am involved with.

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.

Care provided by nannies should be paid CCB if they meet the criteria under the Education and Care National Regulations ie., safe home, qualifications, on-going professional development and support from a professional ‘service’.

If nannies are going to be eligible for CCB they would need to be registered and monitored to ensure that the children are receiving a quality service that meets the assessment and rating criteria under the NQF.

So who would do this? In reality registering nannies through a FDC services would be the most logical solution as FDC services already have a successful system in place for registering, monitoring, supporting and training educators in a home based situation. Attaching other home based forms of child care to Family Day Care would allow this system to be put into place more simply without having to implement an entirely new system into the childcare sector.

Family Day Care services have the expertise to visit educators in a home environment, they already have ‘expert’ knowledge in regards to National Law, Regulations and Standards. They already have systems in place for visiting educators for support and monitoring the quality of care (NQS), policies could easily be adapted to include nannies and services have an administration system which would cater for all financial requirements.

Nannies who do not wish to meet the criteria under the NQF should not be able to receive CCB.

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.

Currently In Home Care is highly difficult to access due to the strict criteria of eligibility.

If In Home Care as it currently stands is abolished and Nannies or In Home Educators become 'approved' (meet requirements under the Education and Care National Regulations), they would need to be supported and monitored as per Family Day Care Educators (by Family Day Care Services) to ensure that quality of care is not compromised.

The Government needs to recognise that if Nannies have access to Child Care Benefit then this would effectively increase the already massive budget, which the Government is trying to reduce. However, it does provide another child care option for families and could be an another option (along with FDC) for families in regional/rural areas.

Box 8.8 ANAO review of the Community Support Programme

The CSP was reviewed by the Australian National Audit Office in 2012. The purpose of the audit was to 'assess the effectiveness of DEEWRS administration of the Community Support Program funding' by looking at its planning, management and performance reporting. It found that the delivery arrangements of the CSP were 'generally sound' but questioned whether the policy settings of the program were realising desired outcomes. Key findings of the report included:

- *the Department has not evaluated the effectiveness of the CSP in improving access to childcare (p. 15)*
- *the majority (71 per cent) of CSP expenditure in 2011-12 was allocated to support FDC (which has about 10 per cent of children in formal care). Only 21 per cent of CSP funding was allocated to LDC and OHSC, despite these care types accounting for approximately 90 per cent of children in care (p. 16).*
- *the Department had not analysed the market to identify the areas where the market would not meet ECEC needs without CSP funding (p. 16).*

The ANAO recommended that the Department:

- *analyse the child care market, including the areas where the market would fail to meet child care needs without Community Support Program funding; and*
- *review the appropriateness of the current eligibility criteria and payment rates in light of this analysis.*

In response to this review, the Department of Education has tightened the requirements for FDC to be eligible for CSP funding to be more in line with other care types. For operational support, this includes a requirement that the service is the only FDC provider within a specified geographic locality and is able to demonstrate to the Department that there is unmet ECEC demand in the area where the service operates. Additionally, a cap has been introduced that limits operational support payments to \$250 000 per annum for a FDC service.

In 2012-13, about 80 per cent of CSP funding was in the form of operational assistance to FDC (chapter 4). This suggests that the CSP has become an alternative way of supporting FDC services (possibly with lower fees charged to families), which was not its original intent. Expenditure is overwhelmingly directed at major cities and inner regional areas.

*The Commission recognises that location can affect the costs of providing ECEC, particularly in the face of low and fluctuating demand. The Commission's proposed funding model, as described in chapter 12, recommends a new approach to account for different costs between locations and supporting ECEC services that may be subject to fluctuations in demand that make it hard to **remain** viable in every year.*

The Government has a responsibility to determine that any funding (outside of CCB) is allocated in the areas of most need. Family Day Care is a unique system of childcare and provides excellent outcomes for children. However the funding does need to be directed to the areas of greatest needs. Families in Major Cities have access to various forms of child care which gives families 'real options' in regards to their child care preference.

Families in inner/outer regional and rural areas do not, in most cases have the choice in regards to which child care service they will send their child too. Many inner/outer regional and remote areas do not have the population to support all the various forms of child care which are found in Major Cities. Family Day Care in many instances becomes the prime/only child care option available. It is vital that funding is provided to Family Day Care services who monitor and support educators in inner/outer regional and rural areas so that children can access quality child care programs.

Box 8.9 Innovative models of integrated service delivery

In my experience, Family Day Care services and educators are ideally placed to form strong relationships with other services. Educators in small communities become involved in local community events and form sound relationships with other professionals within the area when the locations of the educators allow that to occur. Often visits to schools, local libraries, playgroups etc., are part of 'everyday' programs which fosters strong relations between the educator and other service providers in the area.

Services liaise with other services within the community and set up networks which allow them to support each other, their families and children and provide an excellent referral system.

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.

Further consultation is required in regards to Family Day Care CSP Funding, the Governments proposed criteria for determining future eligibility that has been put forward is only one of many options and it does not adequately cater for children and families in inner/outer regional and rural areas where Family Day Care in many cases is the only child care option that is available and the need for childcare in these areas are vital for working families.

Whilst placing a cap (limit) on the amount of funding each service can access is equitable, the criteria that the Government has introduced for determining funding for Family Day Care, based on the SA2 location of the services office, is totally inequitable and merely an easy fix to assist with reducing the budget. The needs of children and families in regional and rural areas have not been considered, when the criteria for eligibility for funding was developed.

A far more simple, realistic and equitable form of CSP funding for areas of greatest needs could be determined very simply by the postcode of the educator. With the current DoE timesheet processing program which runs via CCMS it should be an easy upgrade for the program to be able to identify postcodes (and/or locations) of educators. Services eligible for CSP funding would be dependent on which postcode (remoteness category) individual educators provide care in. If the funding for Family Day Care was provide for inner/outer regional, remote/very remote areas at a 'sliding scale' as it currently is then the funding would be provided to the areas of greatest need where other forms of child care are either minimal/non flexible and/or non-existent.