



As an Indigenous Professional Support Unit who support Indigenous Budget Based funded services, this feedback will reflect and focus on the services we engage with.

Nationally the IPSU Alliance engages with BBF services in each State and Territory in urban, regional and remote areas. We support a variety of different types of services such as Mobile services, MACS, Out of School Hours Care, Family Day Care, crèches, flexible child care and playgroups.

- **DRAFT RECOMMENDATION 7.8**

Ultimately this recommendation should allow for equitable opportunities for all children across the nation allowing for flexibility of implementation dependent on type of service and the demographics of the surrounding communities. In the NT remote and isolated communities allowing for contextualization and flexibility in implementing the National Quality Framework is important to reflect the local culture and language and respond to the often vulnerable children and families. The transition towards the national Quality Framework has been progressive and this has enabled the implementation of the Quality Improvement Plan to be a positive and realistic step.

It is important to recognize the differences between the variety of services and communities, that flexibility is required to contextualize the National Quality framework to meet the child, family and community needs. Within the NT and the BBF services the children are vulnerable to many complex issues and the National Quality Framework can avail them of equitable opportunities for education, care and learning. It should also be acknowledged that comparison between services needs to take into account the variable of children and communities and the different contexts of the education, care and learning. In this regard the ability of the IPSU to provide ongoing and intensive professional development and support has enabled a smooth transition toward implementation of the National Quality framework using both-ways understanding a strong cultural approach.

- **DRAFT RECOMMENDATION 12.6**

In the NT there are many vulnerable and disadvantaged children. The majority of communities are disadvantaged in many ways and the recommended method of support for children with additional needs would not be advantageous. Most families cannot provide fees and BBF services are not supported by fee income, families are transient and the workforce is mobile, communities are isolated and support is erratic. Support needs to be stable and consistent. The term 'additional needs' has been defined as 4 key groups however in its use the focus is on the term 'disability'. Many children from low income families, at risk of abuse or neglect and who are developmentally disadvantaged (due to culture, location and family) access BBF services in the NT and require the stability of block funding to engage support and implement the National Quality Framework

- **DRAFT RECOMMENDATION 5.2**

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

The BBF care and education service usually has strong links with their community and is in an ideal position to support children and families.

- ***DRAFT RECOMMENDATION 7.3 A nationally consistent set of staff ratios and qualifications for those caring for school age children in out of school hours and vacation care services***

This is a logical progression from the requirements for the Early Childhood services

- ***DRAFT RECOMMENDATION 7.10 A nationally recognised working with children check***

This allows for nationally consistent checks and ease of movement between States and Territories

- ***DRAFT RECOMMENDATION 8.1 Removing the requirement for most children attending an outside school hours care service to be of school age***

The current requirement works in the best interests of children

- ***DRAFT RECOMMENDATION 7.4 Reducing OSHC ratios to ratios that are currently acceptable for children during school hours***

The experiences and range of venues provided for Out of School Hours Care children is such that in order to ensure the children's safety and the service ability to provide a recreational program the ratios need to be more supportive of a challenging and creative program

- ***DRAFT RECOMMENDATION 7.8 and 7.9***

All Early childhood service including preschools should be part of the National Quality Framework enabling equity of access, care and opportunities

- ***DRAFT RECOMMENDATION 12.6 and 13.1***

Transitioning Indigenous BBF services to child-base funding reduces the ability for those services to reflect the culture and community they reflect and could reduce the ability of some Aboriginal and Torres Strait Islander children to access quality education and care. Some of the difficulties in regard to this transition relate to: Priority of Access (many families are unemployed and could not access care), they would not qualify for the subsidy under the Activity test, Aboriginal and Torres Strait Islander families need greater flexibility in relation to Allowable Absences. BBF services need to be flexible to provide opportunities for quality education care and learning.

If BBF services and their families choose to transition to an alternative funding method then this should be made available to them.