



**SUBMISSION – CHILD CARE**

**PRODUCTIVITY COMMISSION**

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Further to submission submitted 3<sup>rd</sup> February 2014 and release of the Draft Report 22<sup>nd</sup> July 2014 and attending the public hearing in Perth on 7<sup>th</sup> August 2014.

Areas of further concern in the draft proposal:

- Ratios of educator to children
- Minimum Qualifications
  - WWC card
- Combining existing subsidies of Child Care Benefit (CCB) and Child Care Rebate (CCR)
  - Priority of access
  - Disadvantaged children
- Extending government subsidies/benefits
  - Nannies
  - In home care by relatives
  - Kindergartens
- Costs of inclusion of children with additional needs
- Kindergarten programs extended to child care centres
- Assessment & Ratings of the NQS
  - Site time frames
  - Ratings

**Ratios of educator to children**

Ratios across Australia need to be in alignment and compliment the industry of educating and caring for children. This would allow for all children, in care outside the family home, to be entitled to the same ratios for the given age group and for implementation to be immediate. This should be supportive of the best existing ratios for each age group across Australia being adopted as best practises and all children in Australia to be entitled to the same ratio regardless of the venue being a family day care, child care centre, pre-primary or Kindergarten program where a child is cared and educated in the absence of their parent. Services in some states are able to achieve this is supportive of it being achieved financially across Australia.



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**Recommendation:** *Child/Educator ratios for services educating and caring for children outside the family home to have the best ratios currently across Australia to be adopted and implemented immediately.*

### **Minimum Qualifications**

Due to the brain development in children from birth to 36 months being the most substantial growth for a human being, it is essential that these children in group care situations have the best possible opportunities of nurturing and learning given they are not in a one on one situation. The skill and knowledge obtained whilst completing the Diploma in Children's Services not only allows for additional life experience's to occur but also the educator to have attained a suitable age. In the event the qualification is reduced to a Certificate III in Children's Services the age of this person should be looked to increase to 21 years to have allowed for life experiences to have occurred.

**Recommendation:** *The qualification requirements for children under the age of 36 months remain as is in the NQF.*

### **Working With Children card (WWC)**

Currently each Australian state and territory has a different monitoring system for ensuring the safety of vulnerable people through the requirement of a checking system. The end result is the same but each card provided in a state or territory is currently non-transferable.

**Recommendation:** *To have a national card that is transferable between Australian States and Territories.*

### **Combining existing subsidies of Child Care Benefit (CCB) and Child Care Rebate (CCR)**

I am essentially concerned at the prospect of this. Currently each of the two subsidies have a different criteria, thus meeting a wide range of family situations. Many families that currently access child care will be ineligible for the subsidies under the proposal in the draft report. How the Family Assistance Law assesses the family incomes, it does not take into account a family who has rented their home out to be able to afford to continue to pay the mortgage yet have rented elsewhere, the income of the rent they receive is added onto their income yet no consideration is taken into account for their expenses. This is the case for many families that move to country locations to try to improve their family situation and yet then find they are worse off with less government benefits.

Over the past 20 years we have had times of two separate payments, then joined by another government only to be separated again as they do not meet all families differing circumstances who require childcare.

**Recommendation:** *Continue to have two different subsidies that allow a range of families to access affordable child care.*



### **Priority of access**

The current priority of access has challenges. Being addressed at service level is challenging but it is hard for families with difficulties to be up front and candid in asking for help or acknowledging their child is 'at risk'. Currently we are required to obtain as much information as possible from the families on their application for care, to ensure we are addressing the priorities and this includes making decisions based on how the family currently presents to the service.

**Recommendation:** *There be a simpler way for government officials to be able to accept the decision from someone who is understanding and meeting the family's needs, that these decisions especially for Special Child Care Benefit (SCCB) be left at service level.*

### **Disadvantaged children**

These children are currently lost in the system and instead of having support directed at them, the opposite is often the case, the current requirements of immunisations status and family situation is not taken into consideration for disadvantaged children and CCB is ceased and the family leaves care. Less often is there referrals from Allied Health Services for these families to be provided with access and support in child care being affordable. Disadvantaged children are not just from low income families. These children are also the children with additional needs as it is unaffordable for services to continue to pay for additional staff to include children with additional needs as the government level of support is minimal.

**Recommendation:** *For additional funds be available for increased access for these children to be able to have positions in care that are affordable for all families.*

### **Extending government subsidies/benefits**

- Nannies – for anyone to be able to access public monies there is a requirement for accountability.

**Recommendation:** *Funding to assist in the out of pocket costs of child care be limited to those service types under the NQF that do not receive other public funds ie, Kindergartens, schools etc*

- In home care by relatives – this is very concerning morally for a relative to be paid to care for their own. Support is adequately provided for grandparents who care for their grandchildren in the absence of their parents and require child care due to them still being in the workforce themselves or that they need respite. To allow grandparents to be paid to babysit their own grandchildren will see a decline in family values and morals and is open to less than substantial care for children.

**Recommendation:** *Child care subsidies and benefits not be extended to relatives babysitting.*



- Kindergartens – Currently kindergartens are funded by the Federal and State governments that allow a reduction of the cost of providing care. Child care centres do not have any other form of income to reduce the cost of care and education to families.

**Recommendation:** *If funds are received from public monies in any other format, then the access to CCB or CCR should be restricted to services who receive no other income sources.*

#### **Inclusion of children with additional needs**

The current system has the inclusion of a child with additional needs being a cost to services in excess of \$20 per hour. This is currently requiring services to place restrictions on how many children can be enrolled that require additional staffing ratios. There needs to be changes in the provision of funds to ensure all families have the opportunity to choose the service that best suits them and their child's need and this not have a detrimental effect on the services finances.

**Recommendation:** *To review the current provision of funding for inclusion and increase the current subsidy in line with the costs of an additional educator.*

#### **Kindergarten programs extended to child care centres**

Under the NQF child care centres are required to have a higher staff ratio and higher qualification in a room of 27 children aged 3-5 years than what is required in a room in a kindergarten with the same number of children.

**Recommendation:** *All child care centres across Australia offering a kindergarten program that is based on and meeting the outcomes of the Early Years Learning Framework (EYLF) should be recognised as providing a kindergarten program for children. To promote and fund kindergarten programs in child care centres would save both State and Federal government's funds in other areas of providing the infrastructure to build or extend current schools to increase the places available for a kindergarten program.*