



PO Box 1730  
Preston South, 3072

Phone 03 9486 3455  
Fax 03 9486 3271  
[ausccs@cccinc.org.au](mailto:ausccs@cccinc.org.au)

Committee Secretary  
Senate Education and Employment Committees  
PO Box 6100  
Parliament House  
Canberra ACT 2600

14 March 2014

To whom it may concern

Thank you for the opportunity to provide information to the Senate Education and Employment References Committee Inquiries into the immediate future of the childcare sector in Australia and the delivery of quality and affordable early childhood education and care services.

Please find attached the ACCS submission to the Productivity Commission's Inquiry into Child Care and Early Childhood Learning which addresses the issues outlined in the terms of reference of this Inquiry.

ACCS is the peak body representing Australia's not for profit community managed education and care services and those who support the rights of children to access these services. ACCS has Branches in each State and contact representatives in each Territory. The membership base covers all education and care service types including long day care, family day care, in home care, outside school hours care, preschool, integrated child and family centres, and budget based funded services. ACCS membership includes metropolitan, regional and rural and remote services.

We would be happy to appear in person before the Committee to answer any questions you may have regarding our submission.

Yours sincerely

Prue Warrilow

ACCS National Convenor



PO Box 1730  
Preston South, 3072

Pone 03 9486 3455  
Fax 03 9486 3271

[ausccs@cccinc.org.au](mailto:ausccs@cccinc.org.au)

31 January 2014

Dr Wendy Craik AM  
Commissioner  
Childcare Inquiry  
Productivity Commission  
GPO Box 1428  
Canberra City, ACT 2600

## **Inquiry into Child Care and Early Childhood Learning**

Dear Dr Craik

Australian Community Children's Services (ACCS) welcomes the opportunity to make a submission to the Productivity Commission's Inquiry into Child Care and Early Childhood Learning. ACCS, as the national peak body for the not-for-profit children's services sector, makes this submission on behalf of its members and the families and children using not-for-profit children's services. Case examples are featured in our submission to highlight key points and to illustrate the complexity of the issues.

Our response covers eight areas and includes recommendations and appendices with case studies highlighting National Quality Framework success stories, issues, gaps and opportunities. The broad areas covered and supporting recommendations for each of these areas as listed below.

### **1. Any decisions regarding children's services should be made with children's best interest as the first principle - see page 5.**

#### *Recommendation*

- Use children's best interests as the first principle and underpinning rationale for all deliberations and recommendations to the Australian Government.

### **2. Continued implementation of the National Quality Framework – see page 8 onwards.**

#### *Recommendations*

- Continued implementation to 2020 and review of the NQF as planned.
- Change the assessment and ratings cycle so that a service with a rating of Working Towards the NQS has the option of being reassessed just in the standard/s that they did not receive

Meeting or Exceeding the NQS for, as soon as they have implemented changes and their self-assessment process indicates that they are now Meeting the NQS in that Standard.

- Put on hold the Excellent Rating at least until all services have been through the assessment and ratings process and direct resources saved by doing this to increasing the pace of assessment and ratings visits.
- Increase the number of unannounced visits to services by Regulatory Authorities to monitor continuity of practices.
- Bring all service types including in-home care, limited hours care, occasional care, mobile services and MACS into the scope of the NQF.
- Regulation and full participation in the NQF for any new delivery models that attract government subsidies.
- Further resource services to ensure that there is a one stop reference point (ACECQA or each Regulatory Authority) for information about the broad range of legislative requirements that services need to meet. This could include for example
  - Updating the National Framework Resource Kit to include
    - clear outlines of what each required policy needs to cover
    - listing all other federal and State based legislative requirements in each policy area
  - Regular update alerts and explanatory notes to all services when any federal or state legislative requirement changes across any of the required policy areas and the implications of this for services
- Collation and analysis of data by ACECQA about the assessment and ratings performance of community managed and not-for-profit services as compared to privately owned commercial services and that this information be used to inform the Productivity Commission's recommendations.
- Further improvements to the educator: child ratios for children under 12 months to 1:3.
- Bring forward the timeline for implementation of the 1:11 ratio for children over 3 years, from 2016 to 2015.

### 3. Affordability and funding models – see page 17 onwards.

#### *Recommendations*

- An increase to the current level of Australian Government funding with consideration being given to redirecting some funds from the proposed new Paid Parental Leave scheme.
- Establishing a nationally consistent system for state and federal investment in all early and middle childhood education and care services in scope of the NQF including long day care, outside school hours care, occasional care, limited hours care, family day care, in-home care, preschools and kindergartens to ensure affordability of children's services.
- The creation of one simple consolidated payment system which is paid directly to services which achieves the goal of rolling the investment of the CCR into the current CCB, as recommended by the Henry Tax Review.
- Developing the new combined payment to be delivered by one agency and to be accessible and transparent for families and services.
- Increasing the Australian Government subsidies to 90% of the **full** costs of child care for low income families.
- Increasing the Australian Government subsidies to 100% of the **full** costs of child care for children known to the child protection system, and other at risk or vulnerable children and development of mechanisms that do not depend on regular reapplication processes.
- The provision for additional inclusion support funding to be included in this single streamlined payment.
- Expansion of inclusion support funding to include meeting children's medical needs.
- Higher differential Australian Government subsidy rates for children's services located in areas of vulnerability as defined by SEIFA.
- Higher differential Australian Government subsidy rates for rural and remote communities.

#### 4. Availability – see page 19 onwards.

##### *Recommendations*

- Reintroduction of state/territory planning committees, supported by limiting access to CCB to stop unplanned and rampant growth in areas of oversupply.
- Further investment in early and middle years planning to support local governments and local communities undertake needs analysis and develop and implement models of service delivery that meets community needs. Local governments can provide a key role in the identification of potential sites.
- The Australian Government make available capital grants or no/low interest loans for not-for-profit services in targeted locations (including rural and remote areas and areas with high unmet demand), to build, extend or remodel children's services to meet local needs

#### 5. Flexibility – see page 22 onwards.

##### *Recommendations*

- Exploration of workplace flexibility strategies and promotion of these to employers, including re-establishment of the Australian Government's Work and Family Unit or similar to support this.
- Incentives to encourage large employers to provide or partner with existing early and middle childhood education and care service providers for work-based children's services.
- Eligibility to CCB and CCR (or any new government funding structure) not be extended to include informal care.
- Provision of **additional** government funding for the extensions to existing programmes or any new models introduced to ensure that there are no reductions in funding to existing programmes.

#### 6. Improved access to education and care for vulnerable families and children – see page 26 onwards.

##### *Recommendations*

In addition to the recommendations already outlined in the previous sections on **Full Implementation of the NQF** and **Affordability and Funding Models**, ACCS recommends

- Funding of innovative place based projects that
  - Take a holistic approach to improving access for vulnerable and at risk families and
  - Increase the capacity of early and middle childhood education and care services and local community and family support agencies to work collaboratively to improve outcomes for children and families.

#### 7. Greater investment in funding for Aboriginal and Torres Strait Islander children's services – see page 29 onwards.

##### *Recommendations*

- Implementation of a 10 year plan for integrated child and family services for Aboriginal and Torres Strait Islander families as outlined by SNAICC in their proposal *Early Years Pathways – positive outcomes for Aboriginal and Torres Strait Islander children* and in *Joining the Dots, Program and Funding Options for Integrated Aboriginal and Torres Strait Islander Children's services* (Brennan, 2013).
- Increase the capacity of early and middle childhood education and care services and local community and family support agencies to work collaboratively to improve outcomes for children and families.



## **8. Greater investment in the education and care workforce – see page 30 onwards.**

### *Recommendations*

- Funding of any pay increases that flow from the Application for an Equal Remuneration Order
- Ongoing direct investment in funding wages in early and middle childhood education and care services – investment that unlike the Early Years Quality Fund is universal and does not involve onerous and inequitable application processes and that is not limited to long day care only
- Increased delivery of workforce initiatives designed to attract and retain new educators and teachers to the sector and to support educators working in education and care services to upgrade their qualifications, including a HECS / HELP exemption for early childhood teachers

ACCS looks forward to the Productivity Commission's deliberations in this important review that will impact on the lives of current and future Australian children and asks that any recommendations made by the Commission to the Australian Government considers the best needs of children as its starting point.

Please contact ACCS if you would like any additional information or have any questions.

Yours sincerely

Prue Warrilow  
ACCS National Convenor



## About ACCS

Australian Community Children's Services (ACCS) is the peak body representing Australia's not-for-profit community children's services and those who support the right of children to access these services. ACCS has branches in each state and territory throughout Australia. ACCS is committed to:

- children, families and communities;
- children's entitlements for the best care, education and health services;
- community ownership;
- connected services for children, families and local communities;
- cost effective services - not for profit; and
- cultural diversity and respect for Aboriginal and Torres Strait Islander people as custodians of the land.

## 1. Children's best interest: First Principle

As a signatory to the United Nations *Convention on the Rights of the Child*, Australia has a responsibility to ensure that policies concerned with child care and early childhood learning must respect children's rights enshrined in the Convention.

### Recommendation

ACCS urges the Productivity Commission to use the question - **"Is this in children's best interest?"** - when making recommendations for the Australian Government.

When the best interests of the child principle is applied to decisions we make as a society about how to resource early and middle childhood education and care, we will in turn be making decisions that are best for families and that contribute to their well-being and increasing workforce participation .

*"The quality of childcare is of the utmost importance. I want my son to feel safe, secure and respected. I want to be able to trust that for a large part of his week (2 full days) during this time the values that we are attempting to instil at home occur in this environment. I believe children are constantly learning and require supportive environments to help foster their skills and to help them create a sense of identity. It would make me feel less confident about returning to work (despite the fact I have to) if these issues were being compromised as a cost saving measure."*

*Kate parent at Elwood Children's Centre*

The best interest of the child principle will not only support workforce participation but will provide short and long term economic benefits for Australia. Professor James Heckman, Nobel Laureate in Economics, provides a summary of research that shows investing in early childhood is a cost effective strategy for promoting economic growth, estimating returns on investment of \$7 for every \$1 invested (Heckman, 2012). For disadvantaged children the estimated returns go up to \$16 for every dollar invested in early learning (Committee for Economic Development, 2006).

### Why quality matters

*"The NQF is positive for children and families because it promotes family centred practices supporting and promoting open two way communication between parents and Educators and ensuring a sense of partnership in the care and education of each child. The NQS [National Quality Standard] sets a standard of best practice, rating and assessment across the country allowing parents to have the consistency of safety standards, staff ratios and expectations from state to state and service to service .... Learning is recognised as a life long journey that continues to develop and grow and can take many varied forms throughout our*



*life, from early forms of communicating needs as an infant, to making friendships, to academic achievements throughout school and beyond; and teaching is recognised as a collaborative partnership between parents, Educators and children, ensuring all stakeholders are equally involved. The frameworks embedded into the standard ensure all children are recognised and valued for who they are at any given time and their individual cultures and that they are nurtured and encouraged along whatever path they wish, to see their full potential.”*

*Kaleena Pont, School Holiday Program Coordinator City of Greater Geelong*

(City of Greater Geelong, Victoria offer 270 vacation care places across 5 sites, 10% of enrolments are Child First or child protection referrals, and they currently access inclusion support subsidy for 14 children.)

ACCS is cognisant of the overwhelming research evidence of the importance of high quality early and middle childhood education and care and of the support for this statement from many of the submissions to the Productivity Commission including those from the Business Council of Australia, Early Childhood Australia and many more.

Quality in early and middle childhood education and care services can be understood from a range of perspectives including:

- the child;
- the family;
- the broader community or society;
- the staff; and
- the regulatory or government perspectives (Huntsman, 2008).

The National Quality Framework (NQF) attempts to address most of these perspectives through its strategies and reforms. For example, improving the ratios of educators to children respects and responds to both children and staff rights and needs.

**Case example:** *educators at a Council operated Child and Family Centre in Frankston North (located in a highly disadvantaged community) have identified significant improvement in their capacity to engage children in conversations and learning experiences because of the improved ratio requirements in the NQF. Meeting the improved ratio requirements of the NQS means that the educators can spend meaningful time with individual and small groups of children. The educators have also identified that as a result of this change they feel less stressed themselves and are more aware of their role as educators and not just as carers.*

These educators' comments reflect the international research evidence related to the benefits of improved ratios for both children and educators (Howes, 1997; Munton et al; 2002; OECD, 2000; Vandell and Wolfe, 2000). The vocal opposition to the improved NQF staff : child ratios by some parts of the sector suggesting this is unnecessary reform and an



imposition that affects profit margins, ignore the fact that the ratio changes in the NQF are not that much different from some previous state/territory regulations as well as the actual practice of many not-for-profit services who have operated above minimum ratio requirements for some time (Rush, 2006; ECA Evidence Brief, 2013).

### **Qualifications and quality improvement**

In a 2004 UNESCO Policy Brief on early childhood workforce issues, Moss argues:

*“The workforce in early childhood services in all countries must respond to two related developments: the divide between care and education is breaking down; and the professional role is becoming more complex, with growing recognition of the importance of working with parents and other services and of the competence of young children as learners.”*

This statement remains relevant for the Australian early and middle childhood workforce and is recognised by the qualification reforms in the NQF. Early childhood educators in early and middle childhood education and care settings require specialised professional knowledge and skills in order to be able to meet the learning and development needs of all children including those with additional or complex needs (Forster, 2007). Educators also need knowledge and skills to work in partnership with an increasingly diverse range of families and with the other professionals who work with children and families. Experience in education and care settings, while helpful, is not enough for educators engaged in such important and complex work with children and families.

Research indicates that higher levels of qualifications support better outcomes for children, improved retention rates and job satisfaction for educators and the capacity of services to sustain program quality over time (Huntsman, 2008; Rush, 2006; Sylva et al; 2004).

## 2. Continued implementation of the National Quality Framework

**ACCS supports the ongoing implementation of the National Quality Framework as the regulatory and quality assessment framework for all Australian early and middle childhood education and care services.**

ACCS does not support any watering down of the NQF or the introduction of sector self-regulation or accreditation codes. In a sector with a high proportion of commercial providers self-regulatory codes can only lead to cost saving measures. Self-regulation has the potential to impact negatively on the health, well-being and development of children and place children at significantly increased risk of harm.

The experiences of countries such as the USA which lacks a cohesive regulatory framework shows the real risks to children's safety that comes with a lack of regulation of child care (Cohn New Republic 2013). In Missouri, unlicensed child care accounted for nearly 90% of the 35 sleep related deaths from 2007 through 2010. A disproportionate number of other preventable deaths occurred in this US state in unlicensed care during this time period; for example all seven deaths attributed to child abuse occurred in unregulated settings (Cambria, 2011)

ACCS believes that early childhood education and care needs to be regulated as:

*"Children are a vulnerable group who need protection from the risk of substandard care; a child's early years are critical to their long-term development; the numbers of children and the hours spent in child care are both increasing ; having accountability systems in place ensures the wellbeing of children and the provision of quality care."*

Fenech ( 2006)

The commencement of the NQF on 1 January 2012 was a transformative moment for early and middle childhood education and care in Australia. The Australian Children's Education & Care Quality Authority (ACECQA) NQF *Snapshots*<sup>1</sup> demonstrate that the sector is achieving better than predicted assessment and ratings results against the National Quality Standards (NQS).

Community managed services around the country report that the implementation of the approved learning frameworks including *Belonging, Being and Becoming - Early Years Learning Framework* (EYLF) and *My Time, Our Place: Framework for School Age Care in Australia* (FSAC), and the NQS, improved staff:child ratios for children and the introduction of mandatory minimum qualifications are already providing better quality outcomes for children, families and educators. Appendix 1 provides case studies of community based services that have successfully implemented the NQF.

The NQF is a new system with an inbuilt process of review and it is imperative that this full cycle of implementation to 2020 and review is carried out as planned.

<sup>1</sup> 1 May 2013 - <http://files.acecqa.gov.au/files/130501ACECQA%20Snapshot%20FINAL.pdf>, August 2013 - <http://files.acecqa.gov.au/files/Reports/130801-ACECQA-NQFSnapshot-FINAL.pdf>, November 2013 - <http://files.acecqa.gov.au/files/Reports/0910 ACECQA Snapshot Q3 final.pdf>, accessed 31 January 2014.

ACCS believes that the NQF should include in its scope all early and middle childhood education and care services including occasional care, mobiles, multi-functional Aboriginal services (MACS) and in-home care services. ACCS believes that outside school hours care (OSHC) should remain fully within the scope of the NQF.

## **2.1 Tracking the implementation of the NQF in the community managed not-for-profit sector**

Since the introduction of the NQF ACCS has conducted two waves of a national survey *Trends in Community Children's Services Survey* (TICCSS) designed to track how the community sector have engaged with and implemented the NQF. Over 600 services participated in the first survey conducted in May/June 2012 and over 500 services participated in the second survey conducted in November 2012. Services from all states and territories participated and included a broad range of service types - long day care, family day care, outside school hours care, preschool/kindergarten, in-home care and mobile services. The research was designed to be explorative and the findings presented in the two *National TICCSS Reports* produced using the survey results, are indicative and not representative.

### **2.1.1 Educator and child ratios**

One of the most discussed areas of the NQF has been the new national minimum standards for ratios of educators to children by age groups. These bring in line differing ratios from states/territories to one agreed base line to provide consist ratios across the country to ensure that adequate ratios are in place to meet the needs of infants and children.

Contrary to the reports that this area of the NQF is creating problems for services, *TICCSS* shows respondent services are meeting the new ratios and some services have chosen to operate well above the national standards, recognising the relationship between quality and better educator:child ratios.

For children aged from birth to less than 2 year, 100% of long day care respondents were at least meeting the new national minimum standard of one educator for four babies/toddlers and almost one quarter (22%) were operating their babies' room at educator:child ratios of 1:3 or better. Furthermore 10% of long day care respondents planned to increase their staffing levels in their babies' rooms in the first half of 2013.

A national minimum standard of one educator for every eleven children aged 3-5 yearss will apply from 2016. The first wave of *TICCSS* in May 2012 showed that the sector was already working hard to meet this ratio and had made significant progress to meet this requirement.

In November 2012, the majority of the sector (83%) was meeting the standard (three years ahead of time), and 72% were exceeding it. Furthermore, more than half (53%) were operating at better than 1:10. See Table 1 for further breakdown.

**Table 1: Ratios for LDC 3-5 age group<sup>2</sup>**

Ratios	2012 May/June	2012 Oct/Nov
Better than 1:10	47%	53%
1:10	20%	24%
1:11	5%	6%
1:12	12%	8%
1:13	1%	1%
1:14	0%	0.0%
1:15	14%	9%

Of the 17% of long day care services that were yet to transition to the new minimum, close to two thirds indicated they were going to make the move before 2015.

### *2.1.2 School aged children*

The NQF introduced a minimum of 1:15 educator child ratios for school age children, however many states had better ratios already in place. Forty-one per of respondents delivering OSHC services operate at the NQF 1:15, more than one third (38%) operating at 1:12 or better, including one quarter (26%) operating at 1:10 or better.

**ACCS believes it is imperative for the well-being and safety of children that the ratios in the NQF remain in place or are further improved.**

It is essential that these ratios which have been developed as the minimum standards are maintained across the whole day. The suggestion that the educator:child ratio could be averaged across a day to make it easier for providers to comply with this requirement at peak times of the day is alarming. Services need to be properly staffed so that children are adequately protected from hazard and harm at all times of the day.

## **2.2 Qualifications**

**TICCSS data also demonstrates that the introduction of the NQF has resulted in the sector taking significant action to improve the qualification profiles of educators across all children's services types.**

Both waves of *TICCSS* research provided a comprehensive profile of educators in the community managed and not-for-profit sector in Australia in relation to their current qualifications and any relevant study they were undertaking at the time of the survey. These surveys draw on the experience of more than 5,500 educators. The second wave of *TICCSS* demonstrated that in November 2012 only 11% of educators had no qualification and more than one quarter of the workforce was engaged in studying for a formal qualification (see Table 2 and 3). This demonstrates that the sector has been preparing for the improved qualification requirements included in the NQF over a number of years and are now in a strong position to meet them.

<sup>2</sup> Please note that due to rounding off, some percentages will not add to 100.

### 2.2.1 Certificate III and Diploma qualifications

Since January 2014, 50% of educators in every service are required to have or be working towards a Diploma. In November 2012, 35% of educators had a diploma while 12% were working towards this qualification. From 2014, the Certificate III qualification has become the minimum requirement for educators. *TICCSS* shows that in November 2012, 37% of the workforce already had a Certificate III while 7% were working towards one.

Provisions in the Regulations for those enrolled in study to be considered as meeting the minimum qualification requirements and the option to apply for a waiver if a service is unable to recruit qualified staff in the short term, has addressed any concerns that services would not be able to operate due to a shortage of qualified educators.

**Table 2 : Educators' Qualifications Oct/Nov 2012**

Have no qualifications	11%
Have completed a Cert III	37%
Have completed a Cert IV (OSHC)	2%
Have completed a Diploma (including advanced)	35%
Have completed a three year degree	6%
Have completed a four year degree	8%
Have a post graduate qualification	2%

**Table 3: Educators working towards qualifications Oct/Nov 2012**

Total % engaged in studying	26%
Working towards a Cert III	7%
Working towards a Cert IV (OSHC)	0.4%
Working towards a Diploma (including advanced)	12%
Working towards a three year degree	2%
Working towards a four year degree	4%
Working towards post graduate qualification	1%

### 2.2.2 Early Childhood Teachers

In November 2012, ahead of the 2014 requirement for all long day care and preschool services to employ a degree qualified Early Childhood Teacher, 69% of long day care services reported having either at least one educator with a four-year degree or at least one educator with a three-year degree in early childhood education. Furthermore 25% of services reported having at least one educator currently working towards a four-year degree. This is indicative of educators embracing the professionalisation of their sector and taking up opportunities for higher qualifications.

## 2.3 Impact of NQF ratio and qualification reforms on the cost of education and care services

Much has been made in the media and by the commercial sector of the cost of these reforms. ACCS agrees that delivering quality early and middle childhood education and care does cost more than delivering lesser quality education and care. Quality costs. ACCS believes however that the perception in the media and the community that the increases in

costs associated with the NQF have been extensive and have had a significant impact on families are exaggerated.

Government data released in 2013 shows that there has been an actual reduction of out-of-pocket costs associated with children's services fees for Australian families across all income levels. For families with a gross income of \$75,000 per annum and one child in full-time long day care, out-of-pocket costs dropped from 13% in 2004 to 8.4% in 2012. Similarly, for families with a gross income of \$115, 000 p.a., out-of-pocket costs dropped from 11.4% in 2004 to 8.6% in 2012.<sup>3</sup> The increase in government funding to families has compensated families for fee increases.

The second wave *TICCSS Report* shows that not-for-profit services are offering relatively accessible fees with limited increases from May to November 2012. The average long day care fee of respondent services, in Nov 2012 was \$77.59. Just under half of the services, participating in the survey, actually increased their fees in the six months preceding the survey. The average increase for daily fees for LDC was \$2.59, as tracked between the two waves of *TICCSS*. The main reason identified for fee increases was the normal rise in cost of living (CPI) with over three three-quarters of services (76%) listing this as the number one reason for fee increases.

The impact of changes to ratios, the introduction of mandatory minimum qualifications and the requirement to employ a degree qualified early childhood teacher has been different for each state and territory. For example in Queensland the requirements for Certificate 111 and Diploma level qualifications which became mandatory under the NQF on 1 January, 2014 have been a regulatory requirement since 2003. In Queensland, fee increases cannot be attributed to increased staffing costs linked to the NQF.

For states and territories that have not had mandatory minimum qualifications the costs of implementing this have varied, in the community sector this has sometimes had little or no impact as many services have been operating well above minimum standards for years – employing more staff and better qualified staff than required by law. Where a service has not already been meeting these requirements the real cost implications for families of services employing educators with a qualification or a higher qualification are much less significant than the media would have us believe. The following table shows the increased cost to parent employing qualified staff.

entry point	weekly	annual	difference in wage		DAILY increased cost to parent <sup>4</sup>
untrained	\$ 636.40	\$ 33,092.80			
Certificate III	\$ 725.50	\$ 37,726.00	\$ 4,633.20	\$	0.49
Diploma	\$ 853.40	\$ 44,376.80	\$ 6,650.80	\$	0.70

Children's Services Award 2010 MA000120, rates of pay as of 1 July 2013

<sup>3</sup> Child Care in Australia, DEEWR, 2013, pg 8, available at [http://www.mychild.gov.au/documents/docs/Child\\_Care\\_In\\_Australia.pdf](http://www.mychild.gov.au/documents/docs/Child_Care_In_Australia.pdf)

<sup>4</sup> Assumes a 40-place child care centre operating with an average of 38 children, 50 weeks of the year.

If no other savings could be made, the difference in employing someone qualified with a Certificate III rather than no formal qualifications is an additional \$0.49 per day, and employing a Diploma qualified staff member rather than a Certificate III is an additional \$0.70 per day; nowhere near the \$10 or \$15 often quoted in the media.

## **2.4 Assessment and ratings**

The introduction of this process on the whole has been a positive experience with many community managed services reporting that the process was simpler than the previous accreditation system and provides a more authentic and real picture of the quality of the service. (See Appendix 2 for Case Studies).

The previous National Childcare Accreditation Council system was based on 33 standards and involved a validator marking 701 indicators as occurring or not occurring. In contrast the new assessment and ratings system is more streamlined. It is based around 18 standards and requires services to be meeting only 58 elements. Quality assurance processes in other sectors also require assessment across a similar range of benchmarks for example the *Queensland Disability Service Standards* has 10 Standards and 49 indicators and the *National Standards for Mental Health Services* has 10 Standards and 69 criteria.

Another positive change which has streamlined the process for services has been the provision for services to make minor adjustments after the assessment and ratings visit to enable them to achieve a rating of Meeting NQS.

ACCS believes that it is imperative that for a service to be rated as Meeting the NQS it should meet each of the 58 elements. When the health, safety, wellbeing, learning and development of children are at stake it is essential that services are supported to meet every single minimum standard. In some situations 'a pass' means getting 50% or better on a test, applying the best interests of the child principle to assessment and ratings means nothing but 100% is acceptable for Australia's children.

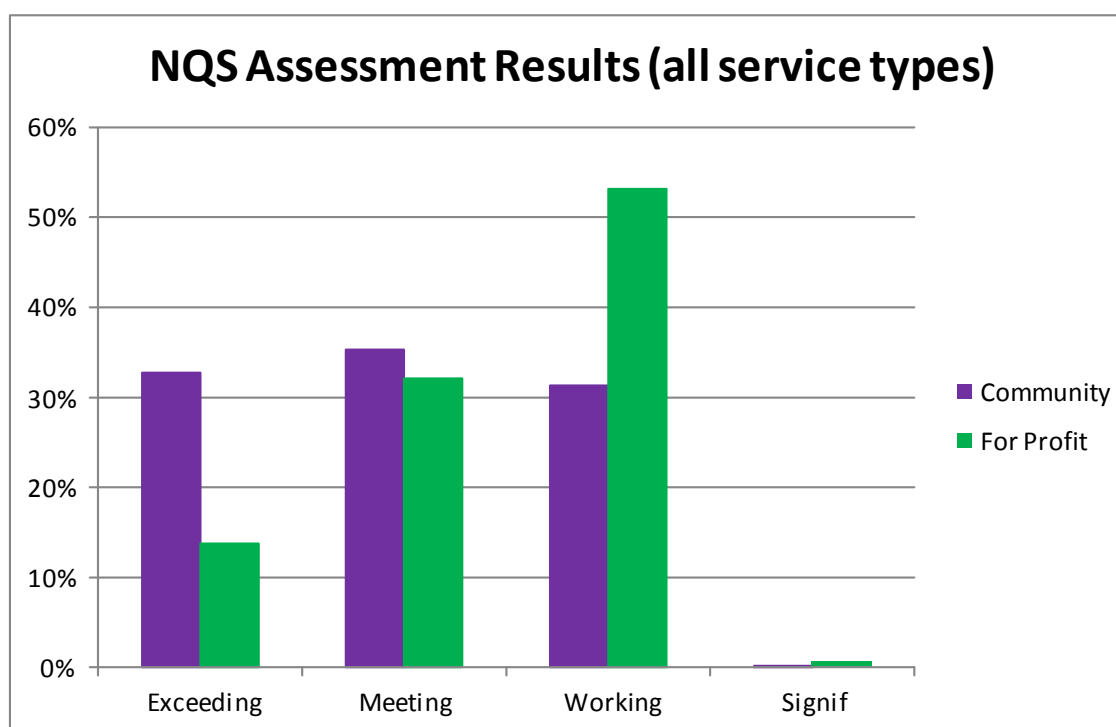
ACCS believes however that there could be some further streamlining of the assessment and ratings process to enable services to be reassessed just in the standard that they have received *Working Towards NQS* for. Services should have the option of being reassessed just in the standard/s that they received *Working Towards the NQS* for, as soon as they have implemented changes and their self-assessment process indicates that they are now Meeting the NQS in that Standard. It is disheartening for a service to have to wait for a whole new assessment and rating cycle in order to achieve a better rating and time consuming for a Regulatory Authority to reassess every standard (when a service may have received Exceeding the NQS in some areas).

ACCS believes there are problems with the Excellent rating and that it is inequitable that services can apply for this rating before all services have been through the assessment and ratings process.

Analysis of assessment and ratings result nationally indicate that overall the community sector is performing more strongly than the private sector.



The results of NQS Assessments show that nationally community based early and middle childhood education and care services are providing higher quality than for profit services. This national consistency across all children's services types clearly demonstrates the importance of the community based sector in leading quality and accountability in children's services provision. The following table shows NQS ratings by governance model<sup>5</sup> – that is not-for-profit and for-profit.



Although this data analysis may have a small margin of error, this pattern is sufficiently strong to demonstrate that community based services are performing better under the quality framework. This brings into question why government money should be used to support the for profit sector when that funding is going into private financial gain rather than building quality provision for the nation's young children and their families. Investment in the community based sector clearly pays greater dividends.

ACCS recommends that this Productivity Commission seek more rigorous data and analysis of this data from ACECQA, on the performance of the community and not-for-profit sector as compared to the private sector.

## 2.5 Administrative impact of NQF

The introduction of the NQF was celebrated as a long awaited administrative reform for service providers and those involved with the management of early and middle childhood

<sup>5</sup> This table was provided by ACCS member Brian Newman, Manager Children's Services, University of Melbourne, with data from the National Register published on the ACECQA website, and then broken down by ownership and service type.

education and care services. Many in the sector had lobbied for years for an end to the dual systems of state/territory based regulation and national quality assurance administered by different jurisdictions. In the past some services may have needed to submit paperwork to renew a state/territory license and have an inspection based on this application, and also submit paperwork and have an external validation visit against Australian Government accreditation standards within the same year. Service providers and staff in some early and middle childhood education and care services needed to be cognisant of different jurisdictional and different service type requirements and maintain systems to ensure compliance with both.

The introduction of a single uniform regulation and ratings and assessment system governed by the same legislation and administered by one Regulatory Authority in each state/territory has streamlined administrative processes and compliance requirements significantly for many services. The effect of this has not been immediate as services have needed to understand and comply with new requirements and processes and this initial investment in compliance has been time consuming.

ACECQA is tracking and addressing the administrative impact as part of the reform agenda. Their *Report on The National Quality Framework & Regulatory Burden (2013)* shows that services do on the whole not yet perceive a decrease in administrative burden. ACCS believes this is to be expected at this point in the reform process. Over the last couple of years services have needed to undertake a huge amount of work including:

- update policies to reflect changes to legislation;
- write and put into practice several new policies that were not required under previous legislation;
- undertake a self-assessment process against the new NQS and use this to write and update a Quality Improvement Plan;
- ensure that services comply with new Regulations across a range of areas including the introduction of Nominated Supervisors and Certified Supervisors;
- become familiar with and use new approved learning frameworks; and
- participate in or prepare for a new assessment and ratings process.

It is interesting to note that despite these significant demands on services, the research undertaken by ACECQA shows that 78% of providers were either very supportive or supportive of the NQS. ACCS believes that as more services complete their first cycle of assessment and ratings the perception of administrative burden will decrease.

ACCS believes that with many services having successfully moved through this transition period and implemented many new requirements it is imperative that this effort is built on and not wasted. The last thing services need is another round of significant changes to requirements.

An ongoing challenge for services is keeping up to date with and understanding their other legal obligations across all jurisdictions. Addressing this issue would significantly reduce the administrative and compliance complexity for services.

## 2.6 Recommendations

- Continued implementation to 2020 and review of the NQF as planned.
- Change the assessment and ratings cycle so that a service with a rating of Working Towards the NQS has the option of being reassessed just in the standard/s that they did not receive Meeting or Exceeding the NQS for, as soon as they have implemented changes and their self-assessment process indicates that they are now Meeting the NQS in that Standard.
- Put on hold the Excellent Rating at least until all services have been through the assessment and ratings process and direct resources saved by doing this to increasing the pace of assessment and ratings visits.
- Increase the number of unannounced visits to services by Regulatory Authorities to monitor continuity of practices
- Bring all service types including in-home care, occasional care, mobile services and MACS into the scope of the NQF.
- Regulation and full participation in the NQF for any new delivery models that attract government subsidies.
- Further resource services to ensure that there is a one stop reference point (ACECQA or each Regulatory Authority) for information about the broad range of legislative requirements that services need to meet. This could include for example
  - Updating the National Framework Resource Kit to include
    - clear outlines of what each required policy needs to cover
    - listing all other federal and State based legislative requirements in each policy area
  - Regular update alerts and explanatory notes to all services when any federal or state legislative requirement changes across any of the required policy areas and the implications of this for services
- Collation and analysis of data by ACECQA about the assessment and ratings performance of community managed and not-for-profit services as compared to privately owned commercial services and that this information be used to inform the Productivity Commission's recommendations.

- Further improvements to the educator: child ratios for children under 12 months to 1:3.
- Bring forward the timeline for implementation of the 1:11 ratio for children over 3 years, from 2016 to 2015.

### 3. Affordability and funding models

All families, regardless of circumstance, need to be able to afford the cost of attending quality early and middle childhood education and care services. The current system of Child Care Rebate (CCR), Child Care Benefit (CCB), Special CCB, Grandparent CCB, Inclusion Support Subsidy (ISS) and state/territory based funding for preschool/kindergarten is complex and burdensome for families and services. ACCS welcomes the opportunities presented by this Inquiry for a thorough review and overhaul of the funding system. New mechanisms are needed to deliver public funding in ways that make sense to families and service providers, and which give government direct control over the policy outcomes of this investment. It is essential that the goals of addressing affordability, accessibility and availability do not come at the expense of quality. The reality is that the existing funding envelope needs to be increased to achieve these goals.

Given the current context of early and middle childhood education and care in Australia, ACCS supports a cost sharing model with government, employers and families contributing to the cost of universally accessible high quality education and care. ACCS supports an equitable model with the lowest income families getting the most financial support. ACCS does not support any tax deductibility mechanisms as these will support high income over low income families.

The current processes in place to access Special CCB and ISS are onerous, piecemeal, and complex for families and services. The application and reapplication processes are time consuming and often a source of additional pressure for families already dealing with sensitive distressing issues. They create significant barriers to participation for many families. Appendix 3 provides a case study of the impact of this for one service located in an area of high need as an example.

Another significant source of pressure for services is the lack of support and additional funding for the inclusion of children with complex medical needs (see Appendix 3 Case Studies). In some situations in order to ensure the well-being of children, educators need to provide regular intensive monitoring of signs and symptoms, administer regular testing, carry out medical procedures and administer regular medication that may need to be delivered using a mechanism outside educators usual experience. The minimum staff:child ratios are not adequate in many of these situations and puts additional often extreme pressure on educators.

The COAG *National Partnership Agreement on Early Childhood Education* has provided funding designed to ensure universal access to quality early childhood education in the year before full-time schooling, delivered by degree qualified early childhood teachers. Each Australian state and territory has signed a bilateral agreement with the Australian Government with regard to universal access. Each of these agreements is different and

every state and territory has a different level of investment in early and middle childhood education and care. These differences have resulted in children having inequitable access to education and care services across the country. This Inquiry provides an opportunity to address this.

### 3.1 Recommendations

- An increase to the current level of Australian Government funding with consideration being given to redirecting some funds from the proposed new Paid Parental Leave scheme.
- Establishing a nationally consistent system for state and federal investment in all early and middle childhood education and care services in scope of the NQF including long day care, outside school hours care, occasional care, limited hours care, family day care, in-home care, preschools and kindergartens to ensure affordability of children's services.
- The creation of one simple consolidated payment system which is paid directly to services which achieves the goal of rolling the investment of the CCR into the current CCB, as recommended by the Henry Tax Review.
- Developing the new combined payment to be delivered by one agency and to be accessible and transparent for families and services.
- Increasing the Australian Government subsidies to 90% of the **full** costs of child care for low income families.
- Increasing the Australian Government subsidies to 100% of the **full** costs of child care for children known to the child protection system, and others at risk or vulnerable children and development of mechanisms that do not depend on regular reapplication processes.
- The provision for additional inclusion support funding to be included in this single streamlined payment.
- Expansion of inclusion support funding to include meeting children's medical needs.
- Higher differential Australian Government subsidy rates for children's services located in areas of vulnerability as defined by SEIFA.
- Higher differential Australian Government subsidy rates for rural and remote communities.

## 4. Availability

**Families, regardless of location, should have access to high quality not-for-profit children's services that meet the community's local needs. ACCS calls for government investment in establishing or extending not-for-profit early and middle childhood education and care services to ensure that families have access to viable not-for-profit community children's services.**

Current provision of children's services has been market-driven with dramatic growth over the past ten years in private early and middle childhood education and care services. For example, in NSW in 1991, 43% of early childhood education and care services were not-for-profit-community based services. In 2014 this percentage has shrunk to 28%.

The growth of the private sector has been exacerbated by the emergence of several corporate children's services providers, some of which are privately owned and others publicly listed. ACCS has grave concerns regarding quality outcomes for children attending publicly listed children's services. The first priority for any publicly listed company is to maximise returns for shareholders; ACCS does not dispute this important business principle. Maximising shareholder outcomes is in stark contrast to maximising continued investment in delivering quality education and care outcomes for children. The collapse of ABC Early Learning provides lessons for the Australian Government and the children's services sector regarding:

- how growth can be funded in a sustainable manner – clearly growth was not sustainable as the company collapsed due to poor debt to profit ratio, over inflated property values, intangible assets listed in the balance sheet (child care centre licenses) and over market price rents and similar; and
- impact of shareholder returns on quality service delivery with reportedly low food budgets; educational staff having to do daily cleaning (common current practice for G8 child care centres – another publicly listed company); inadequate time to develop and evaluate the children's educational programme, set up activities and attend staff meetings (Rush, Downie, 2006).

Market growth has been random resulting in areas of great over and under supply throughout Australia. This means that some Australian children and their families have limited or no choice about the type of children's service nor the type of operator they use, and in other areas families are overwhelmed by choice most often in markets dominated by the private sector.

Historically and currently not-for-profit early and middle childhood education and care services have set the benchmark for quality. This is reinforced and evidenced again in the current quality ratings where proportionally more not-for-profit education and care services are rated at Exceeding National Quality Standard than private services, and conversely proportionally more private ECEC services are rated as Working Towards National Quality Standard. ACCS analysis of AQECQA rating supports this.

- Exceeding National Quality Standard – not-for-profit – 33%, for-profit – 14%

- Working Towards National Quality standard – not-for-profit - 31%, for-profit – 53%.

Anecdotally, not-for-profit education and care services traditionally enrolled proportionally larger numbers of children from culturally and linguistically diverse backgrounds, Aboriginal and Torres Strait Islander backgrounds, with additional needs, or may be at risk or in vulnerable circumstances. This is reflected in past Australian Government Child Care Censuses up to 2006.

Current governance models make it exceedingly difficult or impossible for not-for-profit early and middle childhood education and care service providers to borrow money through existing financial institutions. These difficulties include:

- having management committees incorporated under relevant associations acts that specifically limit individual liability. This means that if a provider defaulted on a loan the financial institution is not able to sue any individual to recoup its loss. Collectively the management committee has limited liability, and this collective liability is most often limited to a very small amount; and
- not having a physical asset to offset any borrowings. Some not-for-profit early and middle childhood education and care services operate from buildings owned by local or state/territory governments with service providers paying nil or peppercorn rents.

Aside from setting quality benchmarks and actively supporting a diverse range of children and families, it is vital that families have a real choice of the type of education and care services they use. **It is critical that not-for-profit early and middle childhood education and care services continue to thrive, however they must also be enabled to grow.**

Previous Australian Governments have successfully implemented capital grants programs directly targeted to not-for-profit children's services providers for service delivery in areas experiencing undersupply. These capital grants programs were often tripartite arrangements between Australian, state/territory and local governments, with local governments supplying suitable land at little or no cost to facilitate service provision. Areas of undersupply were determined through state/territory planning committees comprising government representatives and expert industry stakeholders who analysed current and future population data and existing children's services supply and demand data to identify areas of undersupply. Whilst some states, for example Victoria, have successful capital grants programs to support the development of integrated services or to increase places needed to meet universal access to 15 hours of early childhood education there are significant gaps in funding available.

#### 4.1 Recommendations

- Reintroduction of state/territory planning committees, supported by limiting access to CCB to stop unplanned and rampant growth in areas of oversupply.
- Further investment in early and middle years planning to support local governments and local communities undertake needs analysis and develop and implement models





of service delivery that meets community needs. Local governments can provide a key role in the identification of potential sites.

- The Australian Government make available capital grants or no/low interest loans for not-for-profit services in targeted locations (including rural and remote areas and areas with high unmet demand), to build, extend or remodel children's services to meet local needs

## 5. Flexibility

ACCS recognises the changing experiences of Australian families. There has been a significant increase over recent decades in dual income families, in women's workforce participation and in non-standard hours of work. There have been changes in the level and type of support available to families including CCR and CCB, and family tax benefits A and B among others. More recently, we have seen the introduction of the Paid Parental Leave Scheme.

As well as supporting the availability of flexible models of education and care it is important that employers provide flexible working arrangements to support increased work force participation. Examples of this include flexibility in working hours and start and finish times, and opportunities to work remotely from the office.

ACCS believes the regulated education and care sector is adapting to the changing needs of families and continues to play a vital role for children, families and the communities in which they operate.

Current and most recent Australian Governments have focused on flexibility of early and middle childhood education and care service delivery. Both the current and most recent Australian Governments believe that families want access to greater service flexibility to support workforce participation outside traditional Monday to Friday business hours.

While there are significant numbers of employees who work outside traditional business hours many parents do not want their children to attend purpose-built centre-based services outside traditional business hours. Over the past 20 years there have been a number of extended hours and 24 hours child care centres built in major capital cities, located at or very close to workplaces accommodating large numbers of shift workers. None of these services were ever fully utilised outside traditional business days and hours, and most experienced minimal or zero utilisation in these non-traditional times. None of these services continue to offer 24-hour provision and less than a handful now offer extended hours, and those that do are all located on state hospital grounds.

Families At Work, a consulting firm with specialist experience in work/life well-being strategies, particularly including work-based child care, has been surveying Australian workplaces for more than 20 years asking employees about their children's services preferences including location and days and hours preferred. Families At Work aggregated survey data indicate that:

- 54% of survey respondents preferred a children's service located close to work, with more preference indicated for this option for children aged from birth to less than two years;
- 44% of survey respondents preferred a children's service located close to home, with more preference indicated for this option for children aged 3 to 5 years;
- survey respondents identified degrees of difficulty they had with their existing child care arrangements - 32% had difficulty finding care for a sick child, 27% had difficulty

finding emergency or temporary care, and only 18% had difficulty with the hours of their care arrangements;

- 70% of survey respondents wanted access to traditional days and hours of children's service delivery, with 12% wanting access before 8am and 14% wanting access after 6pm;
- only 7% of respondents indicated they might use a children's service on the weekend.

Families At Work's more than 20 years' experience translating stated survey demand to actual on the ground demand, is that only one third to one half of stated survey demand results in actual service use. This means that while 12% of survey respondents indicated they wanted access to a service before 8am, in practice this number could reduce to 4 to 6% on the ground.

Experience indicates that parents will put together a variety of formal and informal child care arrangements to do whatever they can to ensure that their children are not attending services for long days and, as much as possible, not outside traditional business days and hours. Families At Work aggregated survey data indicate that respondents would prefer access to workplace flexibility to help manage child care arrangements.

Parents with young children who work unusually long hours either by choice or need, and their employers may believe that child care should be available for the hours of work. However, very long working hours can be addressed by other strategies such as improving family friendly work practices and shared parenting support rather than by expecting children to cope with the stress of long hours away from their primary carers in out of home settings.

To provide flexible hours of early childhood education and care a centre-based service would need to have adequate and sustainable numbers of children attending to cover staffing and operational costs for this extended hours provision. Recent Government flexibility trials in centre-based services indicate that despite initial interest by families once extended hours care was offered there were not adequate numbers of children attending to make this a financially viable option.

Family day care and in-home care are two existing regulated models of care that already provide flexibility in hours for families who require evening or overnight care. These service types are well positioned to offer deliver flexible services as they operate with a lower expenditure base, with less staffing and less capital infrastructure. ACCS supports the continuation and expansion of these and other flexible service models such as mobile services and occasional care. ACCS supports the provision of further resourcing to service types not yet in scope, to enable their participation in the NQF.

Centre-based services also provide flexibility to support families in a range of ways for example:

- increasingly in some states/territories long day care services are offering an integrated preschool or kindergarten program that meets state/territory educational guidelines and supports children's transition to school;
- services take bookings for whole days or sessions (in the case of before and/or after school care) which provide significant flexibility for families allowing variation in pick up and drop off times to suit families different arrangements and to accommodate change at short notice;
- services often prioritise siblings, increasing the likelihood that families can have all children enrolled at the same service;
- services offer casual additional days to families when there are vacancies, including when other families are on holidays; and
- increasing co location of long day care services in integrated child and family hubs.

### **5.1 Funding to informal care**

This current Productivity Commission review is considering provision of CCB/CCR, or similar to informal care providers such as nannies. Existing Australian and state/territory Government children's services funding is provided to formal children's services only. This means that public monies are being directed to regulated, quality controlled, legally incorporated entities that must meet minimum governance requirements, providing governments with transparency and assurance that this public money is being spent appropriately and is highly accountable.

Informal care, such as nannies, currently does not have the same minimum requirements including qualifications, quality assurance, supervision and accountability.

The New Zealand Home Based Care model has been presented as a structure that could be adopted to facilitate direct government subsidies for informal care arrangements. Many aspects of this model are very similar to Family Day Care and In-home Care models that are already established and funded in Australia. In New Zealand carers in these schemes must comply with a comprehensive regulatory framework and must use the New Zealand approved learning framework. The key differences are that the carers are not required to have a qualification and the ratio is 1: 5 (as opposed to 1:4 under the NQF). As outlined earlier ACCS views qualifications and ratios are the two key elements of quality education and care.

ACCS believes that extending government subsidies to nannies is unacceptable for the following reasons.

- Public funding should only be made available to regulated early and middle childhood education and care services. The nanny model of service is not regulated to ensure quality early and middle childhood education and care; therefore in its current state, it does not and should not qualify for government subsidies. How could an individual nanny, in an individual's home be adequately supervised, regulated and quality assured by an appropriate external agency, such as a

government department, to a similar or same level as formal children's services to access publicly funded subsidies?

- Family day care and in-home care are already established as service delivery models that can meet the needs of families requiring out of hours care.
- The nanny model can include house duties such as cleaning, cooking and errands in addition to child care; it would be impossible to maintain a clear distinction between the responsibilities that attract subsidy and support (high quality education and care) and those that do not attract government subsidy.
- The nanny model promotes the further privatisation of children's services.
- Supporting the nanny model is unlikely to be a cost effective investment. It has been estimated that expanding subsidies to nannies will cost \$2 billion.
- There is no evidence that a nanny model style of care has the same early and middle childhood education and care benefits as other service types.
- The current proposal for subsidies for nannies is for this money to come from the same 'funding envelope' as existing CCB and CCR; it appears that this could only be achieved with a reduction in expenditure on existing subsidies which would create a crisis of affordability for families using services which are currently approved for subsidies

ACCS supports an investigation and exploration into how government can support flexible options of high quality and regulated early childhood education and care for Australian children. ACCS believes there is a real need for whole system funding review rather than a band aid approach of extending subsidies to informal care.

## 5.2 Recommendations

- Exploration of workplace flexibility strategies and promotion of these to employers, the re-establishment of the Australian Government's Work and Family Unit or similar is one way that this could be achieved
- Incentives to encourage large employers to provide or partner with existing early and middle childhood education and care service providers for work-based children's services.
- Eligibility to CCB and CCR (or any new government funding structure) is not extended to include informal care.
- Provision of **additional** government funding for extensions to existing programmes or any new models introduced, to ensure that there are no reductions in funding to existing programmes.

## 6. Improved access to education and care for vulnerable families and children

The Australian Government has existing agreed frameworks in place that actively work to support and enhance outcomes for at risk and vulnerable children and families. These existing frameworks include;

- National Framework for Protecting Australia's Children 2009-2020<sup>6</sup>; and
- National Plan to Reduce Violence against Women and their Children 2010-2022<sup>7</sup>.

To improve access to early and middle childhood education and care services for children and families who are at risk or in vulnerable circumstances it is vital that this Inquiry consider issues and proposals in the area of supporting vulnerable children in the context of these frameworks and that Australian Government policy and frameworks are linked together to actively support this process. National Children's Commissioner Megan Mitchell recently reported that

*"connections between the national initiatives are easy to see .... the outcomes of the National Framework for Protecting Australia's Children .... cannot be realised if the outcome of the National Plan to Reduce Violence against Women and their Children is not progressed."*

ACCS would add similarly that unless children are protected and safe, and are able to live free from violence and in safe communities then the objectives of the NQF will be challenging, if not impossible to meet.

ACCS recognises the key role that education and care services play in Australian children's safety, health and well-being and the support network services their families' need. Having strong connections and relationships with children and families often means that ECEC services are aware of challenges and vulnerabilities in their communities earlier than targeted child protection services.

The *TICCS Report* gathered data on the role that the community managed and not-for-profit sector plays in supporting vulnerable children and families. In the second wave of *TICCS* 85% of respondent services identify as having vulnerable children enrolled. Just under half of all services (47%) have only a few vulnerable children, nearly a third (30%) have some and six per cent reported that the vast majority of their children were vulnerable. Just over one quarter of services (26%) reported an increase in the number of vulnerable children in their communities over the last six months.

Early education and care services can often be the first entry point to a child and their family when they are experiencing vulnerability or be at risk. As the provider of a universal primary education and care for families these services are in a unique position to provide a place of

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<sup>6</sup> <http://www.dss.gov.au/our-responsibilities/families-and-children/publications-articles/protecting-children-is-everyones-business>, accessed 24 January 2014.

<sup>7</sup> <http://www.dss.gov.au/our-responsibilities/women/programs-services/reducing-violence/the-national-plan-to-reduce-violence-against-women-and-their-children/national-plan-to-reduce-violence-against-women-and-their-children?HTML>, accessed 24 January 2014.

engagement and link for families to community support that feels safe and is not threatening for families

The impact of the NQF reforms for vulnerable families cannot be overestimated. The EYLF, FSAC and the NQS with their emphasis on the importance strong links with communities and collaborative partnerships between educators and families provide an important framework for inclusive practice. The other NQF reforms in the areas of improved ratios and improved educator qualification requirements are essential for services to be able to do this effectively.

It is essential that barriers to participation for children with additional needs are addressed. Ensuring adequate inclusion support funding is one element of this. ACCS supports the following recommendation from the Early Childhood Development Workforce Productivity Commission Research Report (2011).

*“To ensure that children with additional needs benefit fully from the COAG ECEC reforms, governments should modify the structure and operation of inclusion programs and reassess funding levels so that such programs:*

- *provide sufficient funding and support to enable the inclusion of all children with additional needs*
- *cover the full cost of employing inclusion support workers at market wages*
- *provide funding for an inclusion support worker to enable children with high support needs to attend preschool for 15 hours per week in the year before school*
- *have simple and streamlined application processes, which do not place an undue burden on ECEC services*
- *make funding available to ECEC services in a regular and timely manner*
- *provide multiple-year funding, requiring re-application or adjustment only where there is a significant change in the level of need of a particular child or cohort of children.”*

*Recommendation 8.1*

The bicultural support programme currently funded through the Inclusion and Professional Support Program, is an essential service. It provides eligible early and middle childhood education and care services with access to an interpreter or other bilingual/bicultural person to support the service to enrol and settle a child/children from culturally and linguistically diverse, or refugee or humanitarian intervention backgrounds. ACCS supports the continuation of this programme.

Another barrier to inclusion for some families is the lack of inclusion support available for children with complex medical needs. Families are often unable to access care for children with medical needs because services are not confident of meeting the child's needs. Services get around this by applying for inclusion support assistance but cannot identify the medical issue as the reason for accessing this funding – they use other or linked developmental issues that allow access to funding. The application cannot include the medical needs as a reason for funding an additional worker. The hours funded do not





usually cover the whole time the child is at the service. Appendix 3 tells one family's story about this and the issues that this caused for them. As a nurse returning to work this mother was eventually able to find a place in a hospital child care centre – a context that enabled staff to feel they could manage an emergency.

## 6.1 Recommendations

In addition to the recommendations already outlined in the previous sections on **Full Implementation of the NQF** and **Affordability and Funding Models**, ACCS recommends

- Funding of innovative place based projects that
  - Take a holistic approach to improving access for vulnerable and at risk families and
  - Increase the capacity of early and middle childhood education and care services and local community and family support agencies to work collaboratively to improve outcomes for children and families.

## **7. Greater investment in funding for Aboriginal and Torres Strait Islander children's services**

It is essential that this Inquiry consider issues relating to access to early and middle childhood education and care for Aboriginal and Torres Strait Islander families in the context of the *National Indigenous Reform Agenda* (2008), its related *National Indigenous Reform Agreement (Closing the Gap)* and the National Indigenous Child Development Strategy.

The existing 38 Aboriginal and Torres Strait Islander Children and Family Centres and 270 Aboriginal and Torres Strait Islander Budget Based Funding services provide critical supports to empower and strengthen Aboriginal and Torres Strait Islander children, families and communities. Securing long term sustainable funding for these services and for the establishment of new similar services in Aboriginal and Torres Strait Islander communities is imperative for this nation to address the structural and current disadvantage experienced by Aboriginal and Torres Strait Islander families and communities. The funding model developed to support this needs to be integrated, holistic sustainable and long term. ACCS supports the Secretariat of National Aboriginal and Islander Child Care's (SNAICC) call for a culturally strong, sustainable and effective funding model.

### **7.1 Recommendations**

- Implementation of a 10 year plan for integrated child and family services for Aboriginal and Torres Strait Islander families as outlined by SNAICC in their proposal *Early Years Pathways – positive outcomes for Aboriginal and Torres Strait Islander children* and in *Joining the Dots, Program and Funding Options for Integrated Aboriginal and Torres Strait Islander Children's services* (Brennan, 2013).
- Increase the capacity of early and middle childhood education and care services and local community and family support agencies to work collaboratively to improve outcomes for children and families.

## 8. Further investment in the education and care workforce

The successful implementation of the NQF depends on having a skilled and qualified workforce. Urgent action needs to be taken to address the pay and conditions of staff in early and middle childhood education and care services – a sector that has been underpaid and undervalued for decades.

The 2nd Wave of *TICCSS* (ACCS 2013) shows that recruitment is a significant issue for services, with 60% of respondent services recruiting for an educator position in the six months prior to completing the survey at the end of 2012. Thirty-two per cent of these recruits were for Certificate III positions, 36% were for Diploma, 16% were for degree level and two per cent for directors/coordinators. Satisfaction with recent recruitment experiences was similar to the 1<sup>st</sup> Wave of *TICCSS* (ACCS 2012) with 49% of responses satisfied with the field of applicants who applied for the position, 87% for the successful educator's suitability for the role and 90% satisfied with the educators' qualifications. As indicated previously in this submission while 10% of the workforce had no qualification, at the end of 2012, 25% were engaged in studying for an early childhood qualification.

ACCS believes that issues with recruitment are a product of an under-valued and under-remunerated workforce with poor support pathways into education. Governments and families currently depend on a low paid workforce to deliver early and middle childhood education and care services. The entry wage for an educator, with a Certificate III level qualification is on average \$19.07/hour, which in no way reflects the complexity of their work or the high level of responsibility that they take.

*"Childcare workers subsidise childcare through their very low wages, relative to those paid to other workers with comparable levels of skill doing similar work"*

(Hill, Pocock, et al. 2007, p.31)

ACCS believes that the issues relating to remuneration are clearly linked to gender. The Council of Australian Government's Reform Council report, *Tracking equity: comparing outcomes for women and girls across Australia*, (November 2013) found that the gender pay gap is still 17.5%. It is no surprise that there are more men participating in the paid workforce than there are women. Women often take time away from the workforce to have children and care for them, decreasing promotion opportunity, prospects and pay. Women who don't have children earn more than women that do. The same cannot be said for men. It's time the government examined the inequality in Australia in relation to the gendered distribution of money, time and care (Meagher 2014). The undervaluing of the early childhood workforce and the gender issues underpinning this are gathering widespread attention. ACCS supports the Equal Pay Remuneration Order currently before FairWork Australia.

ACCS welcomed the *Early Years Workforce Strategy (2012)* from the Standing Council for School Education and Early Childhood which highlights the need for a workforce that is professional, growing, qualified, responsive and collaborative. ACCS believes however that this strategy will not provide a long term solution to the need for a professional workforce until equal pay remuneration issues are addressed.

## **8.1 Recommendations**

- Funding of any pay increases that flow from the Application for an Equal Remuneration Order
- Ongoing direct investment in funding wages in early and middle childhood education and care services – investment that unlike the Early Years Quality Fund is universal and does not involve onerous and inequitable application processes and that is not limited to long day care only
- Increased delivery of workforce initiatives designed to attract and retain new educators and teachers to the sector and to support educators working in education and care services to upgrade their qualifications, including a HECS /HELP exemption for early childhood teachers

## Appendix 1 Case Studies – Community Managed Services successfully implementing the NQF

### Flemington Child Care Co-operative, Victoria

**Flemington Child Care Co-operative**, is a 30-place parent managed service in Melbourne. The centre started preparing for these reforms in 2009. Staff at this centre believe that the quality of children's daily experiences at their centre has been going from strength to strength.

The biggest change for this centre was the need to go from five full-time educators to seven full-time educators. Staff and families have really appreciated the difference this has made. Educators have more time to interact with children and implementing the Early Years Learning Framework has influenced how educators work to deliver a meaningful play-based educational program on many levels.

Employing extra staff did result in fees increasing. Daniela Kavoukas, Director of the centre said that families were provided with plenty of information along the way about the changes to the centre and the need for some fee increases. These increases were implemented progressively from 2009 onwards so that the impact for families was spread over time.

*"Families have already experienced the benefits for their children and have been really supportive. The impact of fee increases has been offset to a degree by the increased Child Care Rebate that families are eligible for. Our centre has experienced no issues with viability and we have maintained utilisation rates. The government set out to improve things for children and it's working".*

Daniela Kavoukas, Director

Flemington Child Care Co-operative has recently completed the NQF assessment and ratings process and received a rating of *Exceeding the National Quality Framework*.

*"Meeting the National Quality Standards is not a red tape exercise and doesn't require excessive paperwork it is about ensuring that the centre works professionally in all areas and is a welcoming inclusive place for families"*

Daniela Kavoukas, Director

### Flagstaff Gully Child Care Centre, Tasmania

**Flagstaff Gully Child Care Centre** is one of two centres managed by Phoenix Children's Services, a community not-for-profit organisation in Hobart. Phoenix has always been committed to qualifications and ratios to improve the quality of education and care to young children.

Before the reforms we were already working above ratios 1:4 for child aged from 6 weeks to 18 months, 1:5 for children aged from 18 months to 3 years and 1:8 for children aged from 3 to 5 years. The only change we have had to make to meet the requirements is reducing the size of our 18 month – 3 year old room for 20 children to 18 children to meet the 1:4 ratio with children under 2. This has had a slight increase to parent's fees but when explained to parents we have had no complaints and parents believe they get good value for money.

We already employed more than required qualified educators and degree qualified teachers so we have not had to make any changes there.

Due to our consistent high quality rating under the old accreditation system we are yet to be assessed under the new rating and assessment system. We believe we are continually working towards improvement and look forward to our rating and assessment visit which we view as an external audit to let us know how we are going.

Zoe Manning, Manager

### **Goodstart Early Learning, ACT**

We have embraced the sector changes in the National Quality Framework, and have been working to ensure that all of our centres are meeting the new standards for early childhood education and care (ECEC). In the ACT, we maintain extremely positive and beneficial relationships with the ACT Government regulatory body the Children's Policy and Regulation Unit (CPRU).

These relationships have helped our centres to gain deeper understandings of the regulatory changes and ensure that they are effectively implemented. We have also worked constructively with the CPRU and the sector to offer our perspective on how these changes have been implemented within services.

Goodstart in the ACT has empowered Centre Directors as nominated supervisors to lead their teams in supporting the education and care of children at Goodstart services. We believe the implementation rollout of the NQF is in the best interests of children, families and ECEC services.

Liam McNicholas, ACT Manager, Goodstart Early Learning

### **Joondalup Early Learning Centre, Western Australia**

**Joondalup Early Learning Centre Inc** is a 55 place community service in the northern suburbs of Perth WA and has been operating for 22 years.

For over ten years the centre has employed more than the minimum of qualified educators, starting off with one more Diploma qualified educator to now having a staffing team that includes an additional educator in each of the three groups, totalling twelve equivalent full-time staff. All educators are mature and experienced. One educator holds a Certificate 111, two are completing the Diploma this year, two are early childhood teachers and the rest are Diploma qualified.

The higher staff to child ratio means we have four instead of three educators with each group, and also ensures that we do not transition children to an older age group the minute they turn 2 or 3 years of age. Developing sound relationships is at the core of our philosophy and children and families are consulted before moving children from one group to the next.

Our fees have remained very competitive and are at the lower end of the scale. Currently they are \$90 per day or \$425 per week.

Joondalup ELC began its journey embracing the NQF, in earnest, soon after its last NCAC Validation visit in 2010. We started with unpacking the EYLF which excitedly we found to complement the Centre's philosophy.

We acknowledged that changing practices required 'unlearning' what educators had been taught whilst completing their qualification. In saying that we were pleased to find the practices to be more

respectful of families and children, more personal, which made them more meaningful and more of what we had been aiming to achieve.

Focusing on the children's learning, looking for opportunities for learning and deepening, have led the staff to shift from being 'task oriented carers' to being 'educators', not simply in name but in practice.

Whilst at times, some educators have found the learning challenging, all have recognised the improved quality of their work and the children achieving better outcomes for children. The EYLF is considered to validate the importance of educators' work and worth.

By increasing the qualification profile of our service, educators 'walk taller', and see themselves and their work being more valued and feel that they are working to gaining more recognition as professionals. The professional learning has increased exponentially and this has resulted in everyone benefiting. Educators have been changing their practice by reflecting more, having more professional conversations, researching more and the excellent reputation that the service has enjoyed over the years has only been enhanced.

### **Nanbaree Child Care Centre NSW**

**Nanbaree Child Centre** is a 42 place work based centre managed by Gowrie NSW. Gowrie NSW Centres have continually been committed to better than regulation adult to child ratios and providing high number of qualified educators. Gowrie NSW centres values the importance of relationships between educator and children and by having lower ratios allows for these relationships to grow. Qualified educators also provide a wealth of knowledge and experience to the environment allowing deeper understanding of children and their needs.

With the introduction of the National Quality Framework, Nanbaree Child Centre was not required to make any changes to ratios or qualification of educators to be compliant. We meet all educator to child ratios including the 1 to 5 ratio for toddlers required for 2016. Instead of making changes, it validated our practices and commitment to providing high quality Education and Care for all children and families.

The National Quality Framework is valuable as there is a strong focus on continuous improvement which provides an opportunity to reflect on current practices and policies. A sustainability policy was required to be developed to ensure we met Quality Area 3: Physical Environment. We were required to reflect and develop sustainable practices that are embedded within the operations of the Centre and is consistent in the educational program. As a result of these changes, we received a rating of Exceeding for this standard.

Nanbaree Child Centre will continue to reflect on practices and policies to ensure high quality education and care is provided for all children and families.



## Appendix 2 Case studies – Experiences of NQF assessment and ratings

### Churches of Christ Care Family Day Care Chinchilla Queensland

**Churches of Christ Care Family Day Care Chinchilla** received a positive report card after stepping forward to be in the first round of assessments under the new National Quality Framework (NQF).

Three family day care educators of the five coordinated by Family Day Care Chinchilla, including two home-based educators at Jandowae, were visited as part of the assessment and ratings process. Service Manager Mellanie Budden said that the three educators were nervous but well prepared for their assessment visits. The educators found the assessors to be open and friendly. The assessment and ratings report commented favourably on each educator and

The assessment and ratings report was very detailed and noted that

- The educators at Family Day Care Chinchilla were knowledgeable about the Early Years Learning Framework and supported child-led and initiated activities.
- In all the homes, the environment reflected the lives of children, their local communities and families, with photos of family members and special family moments as well as paintings of recent events, displayed around the service.
- Embedding of sustainable practices, such as recycling, occurred at each of the homes, with children encouraged to bring recycled materials, such as paper and cardboard, to family day care for activities, including gardening and creative works.
- Reflective practice was also observed, for example, one educator, who, after noticing that a child often said “mine” about the toys she was playing with, began placing the child in pair activities requiring sharing, and initiated discussions about the words “my” and “mine”.
- Children have a lot of choice and input, such as input into the toys being purchased.

Ms Budden said that while the assessment and ratings report was positive, there was always room to improve.

*“One thing we learnt from the assessment report was about sustainability inside and outside the home. Learning experiences are not limited to indoors and since the assessment visit we have talked about having learning conversations outside the home.”*

Ms Budden commented that Churches of Christ Care and Family Day Care Chinchilla support the NQF “It is a really positive thing for family day care. It helps the educators to know they are working within the Early Years Learning Framework.”

Extract from ACCS in Action May 2013

### Indigo North Health Outside School Hours Care, Victoria

**Indigo North Health OSHC** is a 20 place rural OSHC service in Rutherglen Victorian. It runs before school care, after school care and vacation care.

This was our first Assessment and Ratings visit under the new system and we were curious to see what it would be like compared to accreditation.

When we wrote our original Quality Improvement Plan (QIP) each staff member had a different Quality Area to look over, we discussed all this as a group and everyone's suggestions were then used to write up the QIP. Once we got notice that our visit was happening we sat down again as a group and reviewed and updated it. We could see how much progress we had made and also identified some areas that we had not yet completed and some new areas we wanted to work on. This meant when the visit occurred staff were all comfortable talking about the work we are doing. We had these staff meetings out of the venue over lunch – it was good to get away as a group and be able to concentrate together!

Indigo North Health is predominately a Residential Aged Care and Primary Care Facility, and to make sure management were involved we specifically asked them to come over prior to the visit and have a look at all aspects of what we were doing. We also invited them to our lunch when we reviewed progress on our QIP – they gave us a lot of positive feedback and this was encouraging to staff.

What we do is all about the children and sometimes they are the last to know important things about their OSHC. We prepared the kids for the visit by explaining what was happening and why. It is important they get to have a say about how the service runs and in the course of her visit the Authorised Officer talked to some of the children.

On the day of the assessment and ratings visit the experience was easy and comfortable. The Authorised Officer spent a lot of time observing our program in action and talking with staff about what was happening on the day at the service.

This year we are including some kindergarten age children in the program. The Authorised Officer took notice of how the set-up of our environment was inclusive of all ages and talked with us about how we made sure we met the needs of the kindergarten children. The day of our visit was extremely hot and because of this the educators made a decision not to run any outside activities and to stay inside for the afternoon. This meant adjustments to the way the afternoon ran and the Authorised Officer discussed how we make decisions like this and adapt to circumstances that arise.

When we received the draft report we were amazed at how much she noticed and recorded as examples of good practice. She was spot on and we were pleased to read a summary of many of the comments that we had made during discussions with her.

We received a rating of Meeting National Quality Standard for all the Quality Areas except Quality Area 4 – Staffing Arrangements – for this we received Exceeding National Quality Standard. We were very happy with our ratings and found the process to be much less stressful than we anticipated. The final report gives an accurate picture of our service which is great to read!

Extract from Newsheet Community Child Care April 2013 page 11

### **NARA Community Early Learning Centre (Nara CELC), Victoria**

**Nara CELC** is a 46 place community managed long day care centre in Preston.

*How did you prepare for the assessment and ratings visit?*

By far the most useful thing we did as a team was to have lots of conversation about the purpose of our actions. I stopped telling the staff “Yes do it this way”. Instead if the purpose of educator's practices seemed unclear or if I thought something could be done differently to improve the outcome, I started asking them questions and encouraging discussion. The team started to ask each other why they do things a particular way and always went back to the Early Years Learning

Framework as a guide. The framework was particularly helpful in encouraging us to constantly think about things from a child's perspective.

*Can you tell us about your Assessment visit?*

Overall the experience was very positive. The two Authorised Officers who came spent a large part of their time in the rooms and looking around the centre, both indoors and outside. They made staff feel comfortable by advising our educators that they planned to write a significant quantity of notes but that this was not negative or positive, just what they needed to do to make sure they documented all that they would need to prepare their draft report. On the day of the visit, Nara CELC had a prearranged booking for a live reptile exhibit / demonstration at the centre. This activity went ahead as planned. We discussed the purpose of such an activity and how the day was different because of this. While they were in the rooms, the Authorised Officers spent time observing the children and what was happening as well as looking at all the programming documentation available in each room (this included children's individual portfolios, program plans which were displayed on the walls and our daily reflective journals).

The Authorised Officers talked to the educators in a respectful and supportive way about many different aspects of their practice. They also asked educators about whether they'd had an induction process and appraisals. After observing lunch time and the transition to rest time, the Authorised Officers discussed sleeping patterns with the relief staff who were covering staff lunchbreaks and asked them how individual children's needs were managed in this process.

Later in the afternoon, I spent time with the Authorised Officers and they reviewed some of the service documentation such as our enrolment forms, and risk minimisation plans. We discussed a wide range of topics such as child protection training, environmentally friendly practices, celebrations, induction, and complaints and grievances. On the day of our assessment and rating visit, the hot water system broke down (of course something had to go wrong that day!) and the authorised officers checked in with me about whether that had been attended to and how we managed that situation.

*How did you and the other staff feel before during and after the assessment and ratings visit?*

We were extremely nervous heading into the visit. Although we thought we were prepared, it is a new system and it never feels like everything is done. The DEECD process was much more relaxed and positive than we had expected. Of course we were all a bit nervous but as the day went on, staff stress levels decreased and we stopped noticing the Authorised Officers were there as we went about the day. When it was over, staff felt really happy that they had been treated professionally and that they had all done a good job on the day. The main thing is it has been a positive experience for staff that they feel proud about!

Extract from *Early Years Edition Community Child Care* (2013) 04/04 page 7

### **Noranda Child Care Centre, Western Australia**

Our Assessment and Rating visit was a very positive experience for myself, educators and the Manager for children services. We were put at ease by the assessors as some of the educators were a little nervous going through the new process, they respected the educators and moved around without interfering in their roles and respected children's space and only participated if they were invited by the children. We as a service and organisation were very excited and proud to be able to show the assessors what the framework looks like in our service. We had ample amount of opportunity to talk to the assessors and the educators were all able to show any evidence of the

Standards and elements that they felt they wanted the assessors to see so they could write this down. We believe that it was beneficial having two assessors on the day as being a busy service there is always many adventures happening throughout the day and the assessors would have more than a snap shot to see everything that happens in the centre. It was a fantastic experience and enjoyed every minute of the assessment.

As an organisation we have been working and tailoring our service to the Early Years National Learning Framework since it's draft form in 2010. This has been a learning journey for us as educators as well as the children. This was not an overnight change. It has taken many professionals development trainings, Staff meetings and many different types of consultation work to achieve this result. We have budgeted extra each year for training, extra studies for educators as now majority hold their diploma for Children services and budgeting for extra support educators to boost ratios in each room. This has been a success in having the extra support in each room and allows more time to have creative freedom in implementing experiences for the children every day. Passing the fee increase to parents has always been minimal as we have carefully budgeted for all these extra which is done by the Manager for Children Services and Secretary treasurer.

Our families of the service are always actively involved and contribute in many ways to support the service, whether this be new ideas for the rooms, equipment, experiments to conduct with the children, cooking with the children, bringing items from home that represent different cultures within the service and offering business services to help with maintenance of the building (i.e. plumbers, architects, gardeners, builders etc) that make the service have a home away from home environment.

We are very lucky to have a wonderful working relationship with the primary school next to us as we offer a school readiness programme to our Kindy age group, we also liaise ideas and have meeting with parents from the Ngala family Centre and are in the process of setting up a community garden venture, we have a great relationship with the shopping complex that invite us to participate in many different activities that extend on children's learning.

In our Education and Care service and in our Organisation quality is a very important factor as it sets the foundation of the children's learning journey from an early age.

Maria D'Onofrio  
Assistant Manager for Children Services  
City of Bayswater Child Care Association Inc.  
Noranda Child Care Centre

## **Appendix 3 Case Studies**

### **Issues with Special Child Care Benefit Frankston City Council**

There are a number of highly vulnerable families in Frankston that rely on the receipt of the Special Child Care Benefit (SCCB) for their children to attend long day care as they do not have the financial means to pay the gap between the CCB, CCR and the actual cost of long day care. It is imperative for these families to access the SCCB so their children can regularly attend long day care in order for their immediate risks to be removed and experience the benefits of ECEC on their learning and development outcomes. However, the complexity of the processes involved with the SCCB is proving to be a significant barrier for these families to access long day care on a regular and ongoing basis.

Under the family assistance law, approved long day care services can approve up to 13 weeks of SCCB in a financial year for a child using their care. However, the 13 week policy is not adequate to support highly vulnerable families whose needs are extremely complex with children who are at-risk of serious abuse or neglect. As a result of their environment, these children often have multiple risk factors that often remain through their entire childhood. In addition, for these vulnerable families financial hardship also remains as an ongoing barrier to accessing long day care, as the complexity of their needs often prevents them from consistent workforce participation. One of the major challenges in working with children at risk is the initial engagement to get them to access the service in the first place. The other major challenge is the actual regular attendance in the service.

The barrier created by the complexity of the SCCB procedures was felt acutely by a service in Frankston, in July 2013 when changes in assessment procedures resulted in 31 applications made by the Centre for at-risk children under Child Protection Orders being rejected. These children were from the most disadvantaged area within the municipality and were obviously entitled to the subsidy, which they had previously been receiving for the past 18 months. This disruption to the SCCB was potentially catastrophic. A considerable amount of work from the Centre staff, Child Protection and CHILD First case workers had been invested in securing these children in accessing our service on a regular basis. As such Frankston Council had to fund these children in the short term at a cost of approximately \$3,000 per week to ensure their attendance wasn't disrupted. This situation raised the stress levels of families who were already coping with family stresses.

To be specific, the key barriers created by the complex SCCB procedures are as follows.

- The time consuming nature of 13 week submissions of SCCB applications for child care centre staff, which also requires support from both Child Protection and Child FIRST Partnership staff.
- The rejection of the template format used by the abovementioned staff. The Australian Government Department of Human Services does not approve of the support letters being supplied by families case managers to accompany the SCCB documentation as they are deemed to be on a 'template format' or are deemed to not contain adequate information.
- Cases where children have been denied access to SCCB despite their obvious entitlement due to procedural changes.
- When a SCCB application is rejected, it is an onerous task with supporting letters being rewritten up to three times by the family's case manager along with discussion and negotiation between Council officers and senior staff at SCAT and DEEWR.

- There appears to be a misunderstanding of Australian Government staff assessing the SCCB applications about the status of the Child FIRST Partnership and its relationship to Child Protection across the State of Victoria. Under Victorian State Government Best Interest Practice Frameworks, children cannot access State funded family support or child protection services without being exposed to two or more risk factors. Therefore Frankston Council believes that a support letter written by senior case managers at Child FIRST Family Solutions who are trained specifically to access and manage risk stating that the child is at-risk should be acceptable. This misunderstanding results from all states of Australia having different structures for dealing with child welfare.

Frankston Council believes that for these most at-risk children who are under Child Protection orders and are experiencing significant long-term disadvantage, there should be a requirement to enable the annual application of SCCB, not quarterly.

Mandy Gatliff | Manager Family & Youth Services  
Frankston City Council — Family & Youth Services

### **Angus' story, Queensland**

At approximately one month of age, our son was diagnosed with bilateral subglottic haemangiomas. Following unsuccessful rounds of surgical intervention, it was decided that a Tracheostomy would be required to preserve his life due to excessive scar tissue formation just below his vocal cords. After three weeks of learning every aspect of his care needs (keeping the Trachy clean, ensuring nothing blocks it, ensuring it didn't get wet etc.), we took our three and a half month baby home and began the difficult journey of being his primary carers as well as juggling all the usual demands of working parents.

The single and most stressful part of our experience was the unavailability of appropriate respite for our child. As Angus was developmentally normal, he automatically became ineligible for more than three hours of respite per week. The respite offered, however, was only available alongside children with profound disabilities, which we thought was an unacceptable risk (with the specific Tracheostomy requirements) and not beneficial from a separation anxiety point of view. For over a period of two years, my husband and I juggled his full-time job with my part-time shift work, which almost cost us both our jobs as we struggled to make it to work on time.

Availability of early childhood education and care was of course the central issue. My husband and I also felt that Angus, being a very social child, should be amongst his peers and not shut out of society just because he had a piece of plastic in his neck! Out of approximately ten facilities ranging from family day care to long day care facilities, only two long day care centres agreed to offer my family early childhood education and care. Mater Child Care immediately accepted him as long as I gave the staff training in all aspects of his care. Despite initial concerns from both carers and my husband and I, the staff developed all the skills required to manage Angus' Tracheostomy and there was never an associated emergency with it.

I was, however aware of the extra responsibility Angus' Tracheostomy brought to the care environment and enquired about extra assistance in the form of Inclusion support through the Inclusion Support Subsidy, however, due to the Tracheostomy being a 'Medical



Appliance' under the definitions at the time, Mater Child Care were unable to be granted extra funding for the extra staff assistance.

Instead, the only other option was to place him in a facility with children who could NOT give him the intellectual and developmental stimulation that a child with his cognition required. I found this insulting to Angus, but also to other children who through no fault of their own were not able to be supported in a developmentally appropriate educational setting due to factors which are often beyond the control of the child themselves, but also their parents and even the medical/surgical teams supporting their health care. These children are often able to be integrated into mainstream educational facilities once reaching school age but are at a distinct disadvantage in their Early Years Education, which is now recognised as the most important phase of their development.

I was dumbfounded by the lack of funding available for an otherwise developmentally well child, as having Angus cared for amongst other children his age assisted his social skills but also his communication skills, which required extensive Speech Pathology. Due to Angus' Speech issues, he has had problems with reading ability, however, with continued interventions from the Learning Support teacher at his State School, has made great progress in the last year. I do wonder though, how much more disadvantaged his education would have been though, if my husband and I had NOT made the decision to push ahead with sending him to a regular Early Childhood Education and Care service..

The benefits of having access to Early Childhood Education and Care, however were not limited to Angus' development. My husband and I were able to more successfully juggle being working parents and the stress we had experienced was very much alleviated.



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