

Background

The Catholic Diocese of Parramatta has 58 primary schools, 6 preschools and 49 children's services across Western Sydney and the Blue Mountains. We serve one of the fastest growing areas of NSW. This submission has been prepared by Catholic Diocese of Parramatta Services Limited, the Approved Childcare Provider for the Diocese. We provide Preschool and OSHC services under the 'Ambrose' brand - see <https://www.ambrose.org.au>

Additional Child Care Subsidy – Is it supporting our most vulnerable children?

We are grateful for the opportunity to provide a submission to the Public Enquiry and would like to be an advocate for the most vulnerable children and families in our community.

As a provider of preschools and OSHC services across Western Sydney we are challenged and concerned that the Child Care Subsidy System does not support many of the children who need it most. In our schools there are children faced with incredibly difficult home environments. Parents incarcerated, struggling with addictions, chronic unemployment, domestic violence, bullying, neglect and poverty. For these children our schools and early childhood services are not just a place of learning, but a safe haven and a place of respite. As the provider of OSHC services on school sites, we want to welcome vulnerable children into our services. Providing child-centric programs we can offer much needed support – nutritious food, friendships, well-being programs, sport, help with homework or a safe space to rest.

We know that children and families want such support. When schools have offered free after-school NRL programs, book clubs or basketball clinics the extracurricular activities have been welcomed and attendance has been high. However, the gap fees and onerous enrolment process for OSHC services have created an insurmountable barrier for families and therefore children to access the OSHC service.

Our most vulnerable families do not meet the activity test required to be eligible for CCS and, paradoxically, you must be eligible for CCS to be considered for ACCS. There are also vulnerable children from families that are eligible for CCS – but the families are unable or unwilling to pay gap fees and legislative restrictions around 3rd Party Payments prevent our organisation from waiving or contributing to gap fees.

Suggestions

1. We suggest the CCSS and ACCS system is altered to provide School Principals the ability to recommend a child for ACCS and free access to OSHC care. This decision should be based on the child's well-being and safety – not on the parent's activity or eligibility for CCS. We recognise parents are primary carers and would need to consent to care – but the onus should not be on the parents to have to engage with the service and explain what is, in many cases, very difficult circumstances which they may feel shame, humiliation or they may not have the emotional resilience to engage in the current ACCS process. Empowering the Principal would preserve the dignity of the family and allow vulnerable children access much needed care.
2. We recommend that legislation is changed to give Providers the ability to waive or contribute to gap fees for disadvantaged or vulnerable children. As a not-for-profit provider our focus is on mission, it is not sustainable for us to provide 'free' services – however if vulnerable

children are partially funded through CCS, it could be viable for providers to contribute to costs by waiving gap fees in full or in part. In this way, we partner with Government to support our most disadvantaged children.

Streamlined Approval Processes for Preschool's on School Sites

In June 2022 the NSW Government announced its Early Years Commitment, and the introduction of universal pre-Kindergarten (UPK) in the year before primary school for every child in NSW by the end of the decade. The recently elected Government has re-cast this as Universal Preschool (UPS) and reaffirmed its commitment to the overall aspiration.

The Diocese of Parramatta supports the government's vision of Universal Preschool. To realise the vision will require revolution in childcare and unprecedented growth in the number of preschool places. The Parramatta Diocese, with 58 Primary Schools and 6 Preschools is well positioned to significantly contribute to the growth of preschool places by locating preschools on existing school sites. This welcomes preschoolers into a school environment and provides rich opportunities for transition to school programs. It provides convenience, and one-drop off point for families with pre-schoolers and older siblings at school.

Barriers to growth in provisioning preschool places

- Under the State Environmental Planning Policy (Transport and Infrastructure) 2021 a preschool (even those located on school sites) is defined as 'centre based childcare centre' and there are no provisions that allow those works to occur via Exempt or Complying Development under this policy. This means each preschool needs to be approved via a DA submission with the local council – a process which is arbitrary, costly and often, unreasonably long.
- Local Councils Development Control Plans (DCPs) typically require centre based childcare centres to provide car parking at a ratio for 1:4. This will not be possible on many school sites or will it come at the cost of encroaching on the school's outdoor play spaces/ovals.
- Education and Care Services National Regulations 107 and 108 require preschools to have 3.25sqm of unencumbered indoor space and 7sqm of unencumbered outdoor space. At some schools with limited space these requirements may be challenging or will be achieved to the detriment of the primary school students at the site.

Suggestions

1. We suggest that the definition for 'school-based childcare' under the Environmental Planning Policy (Transport and Infrastructure) 2021 is altered to include preschools on school sites. This would allow preschools to be governed by more appropriate controls and provides the possibility of more streamlined complying and exempt approval pathways.
2. We suggest that Regulations 107 and 108 are reworded to allow preschools approved spaces to include the use of areas shared with schools. This will allow opportunities for a more efficient use of resources (and could support the transition to school program). For example, preschool and school students both have access to the school's sensory garden. A timetable and plan of management is in place to ensure the needs and safety of all children is met.