

Introduction

Bega Valley Shire Council is located on the far south coast of New South Wales. It has a population of 33,259 spread across 6,052 square kilometres. Our capital city, Sydney, is 420 kilometres from our regional centre Bega. The Bega Valley has a higher proportion of low income families than the average for regional areas of NSW.

Bega Valley Shire Council is committed to optimising social infrastructure that supports our population now and into the future. This is articulated in the Charter for Councils under the *NSW Local Government Act (1993)*. Bega Valley Shire Council balances this commitment with the challenges of maintaining essential services to ratepayers. As is the case with many other rural locations, there are few regionally based organisations that have the capacity to manage the regulatory and operational demands of providing quality early childhood Education and Care Services. For these reasons Bega Valley Shire Council believes that local government has a role to play in the provision of rural early childhood Education and Care Services.

Bega Valley Shire Council is the Approved Provider for 4 rural children's services. These are:

- 39 place long day care program located in Eden
- 39 place preschool located in Eden
- 59 place multipurpose children's services providing long day care, preschool, occasional care, after school care and vacation care located in Bega
- 18 place mobile preschool service to outlying villages in Candelo and Bemboka.

There are more than 350 families who use these services.

What Bega Valley families say about why they choose to use our Education and Care Services

There are several factors that families report influence their decision to use the Education and Care Services provided by Bega Valley Shire Council.

- **Accessibility:** the service is located within the community in which the family lives or works; it is affordably priced and offers quality education and care standards. The service offers a range of programs in one location so that children from one family can stay together. Educators are qualified, often long serving and well known to the family.
- **Community connections:** the service and programs are used by extended family, neighbours and friends; the services are networked with other aspects of community living including schools, voluntary groups, specialist health services, specialist family support services and early intervention programs.
- **Flexibility:** the service offers a range of programs including funded preschool, long day care, after school care, vacation care and occasional care. There is a central waiting list and administration process that means when a family's needs for Education and Care changes it is easier to move between services or programs.

The information from families confirms that the current mix of Education and Care Services provided by Bega Valley Shire Council reflect the *Early Childhood Education and Care Performance Indicator Framework* described by the Productivity Commission (Productivity Commission, Report on Government Services 2014, B48).

Snapshot of Bega Valley Shire Council Children's Services families (July – Sept 2013)

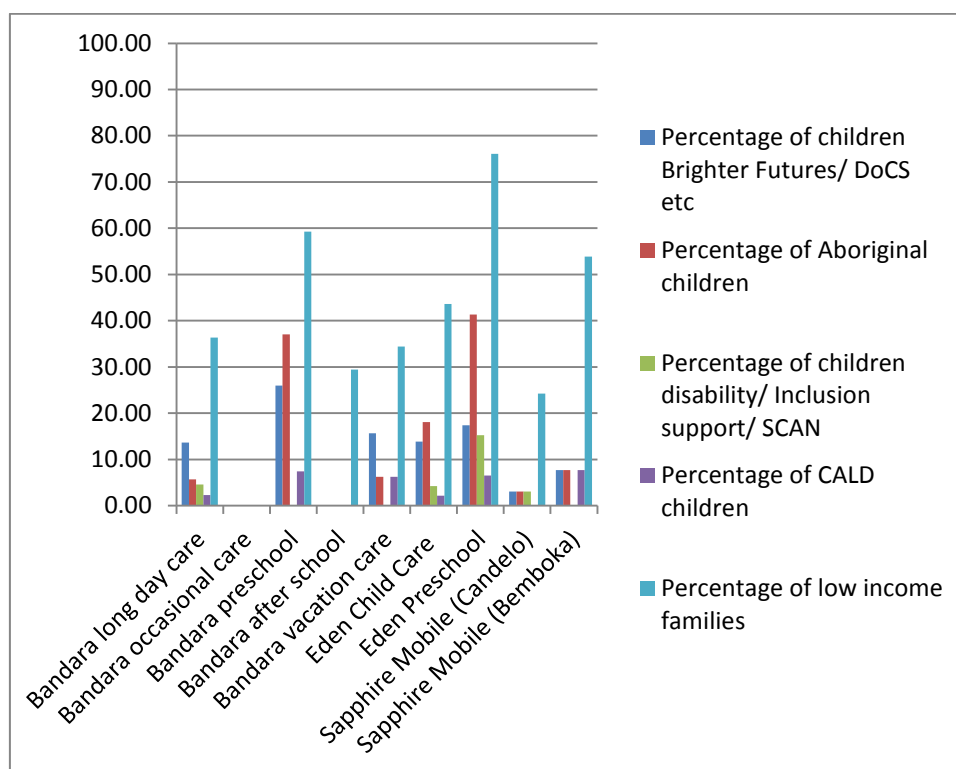


Diagram 1. (Source: Bega Valley Shire Council quarterly report, June – September 2013)

Productivity Commission Enquiry into Education and Care Services, 2014

We wish to comment on several areas of the Productivity Commission *Enquiry into Education and Care Services, 2014*.

Our comments are contextualised by the realities of living and working in a rural locality and draw from our experiences as an Authorised Provider of 4 education and care services that offer programs for children 0 – 12 years. We have included feedback and examples from educators who work in the services, and from families who use our services. Identifying information has been removed to protect privacy.

Summary of Recommendations:

1. Improve and simplify the model of funding for Education and Care Services
2. Provide all 3 year old children in rural locations with access to funded Preschool
3. Connect existing funded education transport services with centre-based rural education and care services
4. Improve access and streamline application process for targeted inclusion support funding for children with disabilities in rural NSW locations
5. Extend investment in targeted Indigenous Preschool funding in rural NSW Education and Care Services to include long day care programs providing Preschool.
6. Review the effectiveness of including Out of School Hours services in the National Quality Framework (NQF).
7. Remove barriers and legislative obstacles to providing multipurpose and co-located services
8. Increase government investment in improving and upgrading rural buildings and facilities
9. Modify teacher attendance in NSW education and care services with 25 or more children. Bring requirement for covering short term absences, including sick days, into line with the NQF.
10. Provide moderation of Education and Care pre-service student competencies and outcomes against the NQF standards.

Recommendation 1: Improve and simplify the model of funding for Education and Care Services

Background/ Issue

Families who use Bega Valley Shire Council Education and Care Services are complex and diverse. They include:

- people who work full-time, part-time, seasonally
- people who study in education institutions or by distance
- people who parent alone
- people who are separated from their partner by distance and work location
- people who are grandparents
- people who are foster carers
- people with limited literacies
- people who are Indigenous
- people who come from overseas as refugees
- people whose family language is not English
- people who have had difficult personal experiences with institutions
- people who need help to parent.

The first step in using a Service involves contact the Family Assistance Office (FAO) to register for Child Care Benefit (CCB). Each family's ongoing eligibility for CCB or for other subsidies like a funded Preschool place requires them to work with a Government Department, update personal information (eg Immunisation status for their child, Income levels, Health Care Card), work with their Education and Care Service and, if their child or family is receiving other forms of support funding, work with third party agencies. For many families this is overwhelming, cumbersome and at times too difficult to pursue. The system is equally complicated for the people in Government Agencies who are responsible for providing information, advice and support to families.

For example:

A working grandparent recently took responsibility for the care of their grandchild following the hospitalisation of the child's mother, and intervention by a government agency. The grandparent had no background in education and care services. She struggled to have the child's Customer Reference Number (CRN) transferred to her name, find and provide evidence of the immunisation status of the child, register with the Family Assistance Office, communicate and be involved in a case plan with the government agency, balance and negotiate her work commitments with the availability of child care and to set up her home in ways that met the needs of a young child. The Administrative Officer in one of our services recognised that the FAO had not provided her with the correct information about additional funding available to her as a grandparent in these circumstances. If the Administrative Officer had not been aware of her personal circumstances the grandparent may not have received some of the benefits that supported her in this emergency situation.

We believe the system of funding for Education and Care Services needs to be simplified and improvements made to information provided by Centrelink/ Family Assistance Office Customer Service staff particularly about different types of subsidy that are available to a family.

Our 4 Education and Care Services currently offer a range of programs that receive funding from different Government sources, as well as family fees. This increases the types of accountability and number of reporting processes required. Information is often duplicated for agencies.

For example:

In 2013 data was collected on Education and Care Service profiles, children, attendance, enrolments, educators, family profile and funding/ fees. This was separately collected by

Department of Education Employment and Workplace Relations (DEEWR), Early Childhood (Now Department of Education), DEEWR Indigenous Affairs (Now Department of Education and Department of Prime Minister and Cabinet, Indigenous Affairs Group), and NSW Department of Education and Communities Early Childhood Education and Care Directorate. These data collection processes sampled different time periods, but collected the same type of data and replicated information. Each required online data entry into different portals/sites.

A consistent National Quality Framework should make it possible to further streamline the funding, reporting and program accountability processes.

Strategy

There are five strategies that we believe would assist in enacting this recommendation:

- 1.1 Provide funding directly to Education and Care Services rather than individual families. This would reduce the technical and administrative complexity of the current system.
- 1.2 Provide additional support for working families, or families using informal care arrangements through tax incentives.
- 1.3 Provide regional and contextualised training for FAO/ Centrelink Customer Service Officers with examples provided by participants from the Education and Care Services in the region.
- 1.4 Ensure FAO/ Centrelink printed information is also aimed at non-literate members of the population.
- 1.5 Require each funded Education and Care Service to submit a single accountability document or online report that any State or Commonwealth Government Department could access to extract the information that they require.

Recommendation 2: Provide all 3 year old children in rural locations with access to funded Preschool

Background/ Issue

Preschool in rural areas is often the centre of a range of connections for families and children who may be socially, culturally or locationally isolated. Many aspects of family circumstances drive the use and benefits of Preschool. These include limited access to paid employment, itinerant employment, limited access to transport, environmental events like drought or flood, higher cost of living, family members with disabilities or high support needs, isolation, lack of accessible support services, limited alternative types of programs for children and so on.

In rural Preschools the birth-rate also dictates the number of enrolments that a Preschool may have in any year.

The changes to NSW Preschool funding have now excluded some rural 3 year old children from being able to access Preschool (NSW Department of Education and Communities, Early Childhood Education and Care Directorate, 2013). This is an access issue that impacts not only the educational outcomes for children and families who reside in rural locations and have limited or no alternative services, but also on the ongoing viability of existing rural preschool services. Flow on effects include increased difficulty in attracting and retaining qualified educators.

For example:

In 2014, a rural family residing on a farm wanted Preschool for their 3 year old child who has no siblings. The family felt this offered their child an opportunity to make connections and friendships, access a safe and challenging range of new experiences and to learn how to communicate with people who were not adults. They have one vehicle that is used by the father on most days, except for the day that mum goes into town to shop, visit the post office and catch up with her elderly mother. Under the 2013 NSW Preschool Funding terms and conditions the family would have paid \$15.00 for the day of Preschool. In 2014, because the

family does not hold a Health Care Card and is not Indigenous their child is not eligible for subsidy. The child's fee for 2014 is \$60.00 for the session. This child will not attend Preschool in 2014.

For example:

A small outlying Preschool in our Local Government Area is surrounded by farms. The only building in the locality is the Community Hall from which the Preschool operates on 2 days per week. The group of children is very small and the community has invested their energy and passion into creating a space for their children. There is evidence for this in the mosaic sign that greets families, the beautiful outdoor play space created with working bees and the families who chat on the steps at the entrance. The 2014 NSW funding terms and conditions reduce their entitlement by more than \$30,000, and threaten their ongoing viability. This is further impacted by reduced access to Preschool for 3 year old children. Not only have the children lost their connections with other children and early educational opportunities, but the community has lost a dynamic focus for community spirit.

Strategy

- 2.1 Priority and reinstate access to Preschool for all 3 year old rural children as essential to education and learning outcomes for children, and to sustaining families and communities.

Recommendation 3: Connect existing funded education transport services with centre-based Education and Care Services.

Background/ Issue

Transport is often a barrier to accessing Education and Care Services in rural localities where there are limited alternative public transport options. In many families there may no access or only shared access to a single vehicle. This acts as a barrier to accessing Education and Care Services, and threatens learning outcomes for young children, particularly for those from Indigenous families (Australian Institute of Health and Welfare, 2012)

For example:

In one outlying village there is no Preschool. Families with preschool age children have other children who travel to and from Primary School on a subsidised school bus. Limited access to private transport for these families means that some children do not attend Preschool at all. The Primary School Principal reports significantly lower rates of school readiness for these children.

For example:

In the central business town of our Local Government area, attendance rates at the Education and Care Service are reduced in winter for families with limited or no access to private vehicles. These families are often from low-income or Indigenous groups. Older children in the same families travel to and from Primary school on the school bus system. Children in these groups are shown to have improved learning outcomes and school readiness with regular attendance an Education and Care Service (Productivity Commission Report on Government Services 2014, B4).

Strategy

- 3.1 Access to a funded transport program would improve the education and learning outcomes for children from families in rural towns and outlying villages who have limited alternative transport options.

Recommendation 4: Improve access and streamline application process for targeted Inclusion Support funding for children with disabilities in rural locations

Background/ Issue

Children with disabilities are included in Education and Care Services with support from programs like Supporting Children with Additional Needs (SCAN) and Inclusion Support Services (ISS). These programs are important to early intervention with the child and family, targeted teaching strategies that improve learning outcomes and capacity building for the community. The application process can be complicated, particularly when using the ISS online portal. Many applications have to be repeated if there are small changes to circumstances during a year. The SCAN and ISS programs are strengthened by the support and expertise of Inclusion Support Facilitators (ISF).

However the burden of evidence of a child's disability often rests with families who have different levels of understanding of the effects of a learning delay for their child, and a range of capacity levels that enable them to pursue medical or specialist diagnosis. These difficulties are increased when specialist diagnostic or therapy services are limited, have long waiting lists and/ or are located in a capital city.

For example:

A child with a genetic disorder that affects her intellectual and physical abilities attended a long day care program. She progressed to the Preschool program with the group of children that she had built relationships with in her early years. There were many stages of consultation and discussion/ case planning involved in submitting an application to continue her care and education in the next room.

The ISS portal 'timed out' on several occasions because of the lengthy amount of information requested and the competing demands of program and service delivery for a Nominated Supervisor. This data was lost when the program timed out and had to be re-entered several times.

The educators and family established that a walker would be necessary for the child to be able to achieve a level of independent movement in the larger and more challenging outdoor Preschool environment. This added another requirement to the application process. A physiotherapist was required to authorise the walker and provide additional supporting documentation. The child's parent is comfortable with dealing with government and medical agencies but had to take time off work and wait for an appointment to get written confirmation of the need for a walker from the physiotherapist. Applications had to then be sent to a 3rd party organisation responsible for a pool of equipment. The child still does not have a walker.

In rural areas waiting lists for specialist services are lengthy and often centralised to a regional town or only available in a capital city.

Strategy

We believe there are three strategies that would support improvements to outcomes for children with disabilities:

- 4.1 Improved funding of visiting specialist diagnostic and therapy services to Education and Care programs in rural localities. This would increase the early detection of disabilities requiring early intervention or specialist health services and would enable families to access services in a less-clinical and institutional setting and increase the capacity of Education and Care Services to provide the evidence and documentation necessary for funding and supported inclusion of children
- 4.2 Simplify the current portal to improve the efficiency of the ISS application process.
- 4.3 Expand the role of the Inclusion Support Facilitator to include regular on-site early intervention and assessment services.

Recommendation 5: Extend investment in targeted Indigenous Preschool funding in rural NSW Education and Care Services to include long day care programs providing Preschool.

Background/ Issue

The Supplementary Recurrent Assistance (SRA) program for our Preschool cluster group has produced important improvements to enrolments, literacy and numeracy outcomes for Indigenous children who are attending Preschool. These outcomes have been documented in the Cluster Group's INDIGO report for 2013, and are evident in the number of Indigenous children enrolled in our Education and Care Services.

For example,

One of our Education and Care Services has used the SRA funding to grow the Indigenous enrolments to above 40% (Ref diagram 1). In 2013 the Education and Care Service the assessed literacy and numeracy levels for Indigenous children in the year prior to school and reported higher rates than that of Non-Indigenous children.

In NSW Preschool programs are provided by qualified teachers in both funded Preschools and long day care services (Productivity Commission Report on Government Services, 2014, NSW Government comments, p. 3.80). The success of the SRA program warrants extending access to the SRA funding cluster to long day care programs providing Preschool with a qualified teacher.

Strategy

5.1 Extend access to SRA funding to long day care programs providing Preschool delivered by an early childhood teacher with ACECQA approved qualifications.

Recommendation 6: Review the effectiveness of including Out of School Hours Services in the NQF

Background/ Issue

Prior to 2012 NSW Out of School Hours Services were registered but not regulated. Families using the programs were eligible for CCB funding. There are good reasons for ensuring that programs for school age children are accountable and meet minimum regulations, standards and safety requirements.

In 2012 Out of School Hours programs were included in the NQF. This move has changed the recreational focus of these programs, increased the cost of delivery to service users, increased the complexity of delivery for educators and Approved Providers and reduced the incentives to continue to offer services.

For example

In 2010/ 2011 the cost of vacation care to families was \$5.30 per hour per child (Exc. CCB entitlements). In 2013/14 the Approved Provider made a one off contribution of \$25,000 to meet the additional staffing, venue and compliance costs of operating Vacation Care within the NQF context. In 2013/14 the cost of vacation care to families is \$7.50 per hour per child (Exc. CCB entitlements). In 2014/15 without the financial contribution of the Approved Provider, changes will be needed to the length of program, the type of program and/ or the cost of the program to families. For instance fees would need to increase by \$3.28 per hour to \$10.80 per hour per child. This would reduce the number of families who could afford to access the program and increase the number of children aged 6 – 12 years in unsupervised care during non-school periods. This raises issues of safety for school age children with limited recreation options during non-school periods when families are working.

We ask whether the inclusion of Out of School Hours Services into the NQF is operating effectively. We believe new legislation that is focused on the specific provision of Out of School Hours Services may work more effectively to create good outcomes for children and families.

Strategy

6.1 Remove Out of School Hours Services from the National Quality Framework

6.2 Provide legislation, regulation and standards that recognise Out of School Hours Services as recreational programs for school age children.

Recommendation 7: Remove barriers and legislative obstacles to providing multipurpose and co-located services.

Background/ Issue

In rural locations the population size, distribution and diverse needs present challenges to providing sustainable and affordable services. Combining Education and Care Services in one locale can reduce the cost of duplicated building resources and administrative functions. It also can improve how families are able to access a range of different types of family support services and programs. We have seen this model work successfully in one site in our central business town. However we face barriers to duplicating the success of this model in other towns. These include:

- the cost of capital works to modify, relocate or rebuild existing services
- the contradictions in legislation that prevent families with children under school age and children of school age from receiving Child Care Benefit for two different programs under one Service Approval (eg After School Care and long day care).
- The duplicated costs of meeting the National Quality Framework requirements for staff, quality improvement processes and accountability in services that operate from one location under two Service Approvals

Capital works investment would create opportunities for a more effective service provision. Efficiencies could be made by streamlining reporting processes for different types of education and care programs and the removal of legislative obstacles.

Strategy

- 7.1 Invest capital in improving infrastructure for co-location or multipurpose Education and Care Services in rural localities
- 7.2 Review and remove legislative obstacles to more flexible service delivery.

Recommendation 8: Increase government investment in improving and upgrading rural buildings and facilities

Background/ Issue

Many of the Education and Care Services in our rural locality are in aging facilities. Over time, these facilities have been maintained but are in need of improvement or redesign to meet the changing requirements and challenges of provided education and care to rural communities.

For example:

Our approach to improving access for families to a range of support services has been to pursue partnerships and provide aligned services in one location. This has seen us provide a venue for important services like health checks, speech programs, early intervention parenting programs and an Indigenous Youth group. In one town when our Preschool and long day care services were built 26 years ago they were located in separate buildings that almost adjoin. Many costs are being duplicated and this impacts on the fees that families pay. The Education and Care Service maintain the buildings but do not have funds to create structural changes to improve how services are designed and delivered.

Additional investment in improving and upgrading our facilities would enable us to provide a multipurpose service in this location.

Strategy

- 8.1 Provide capital investment and funding incentives to agencies committed to co-location or multipurpose service delivery in rural localities

Recommendation 9: Modify teacher attendance in NSW education and care services with 25 or more children. Bring requirement for covering short term absences, including sick days, into line with the NQF.

Background/ Issue

There are many challenges for rural NSW education and care services in attracting and retaining teachers with an ACECQA recognised qualification. These include the costs of recruitment, the limited capacity of rural services to provide attractive and competitive salary and conditions under current funding arrangements, and the needs of a predominantly female workforce for family friendly employment. In addition, the continuation of NSW savings provisions mean that short term absences by qualified teachers must be filled by a person with ACECQA recognised qualifications.

For example:

In 2011, one of our Education and Care Services was unsuccessful in recruiting a suitably qualified teacher after a process that lasted for 18 months. Our Approved Provider introduced funded Cadetship opportunities as an incentive for existing employees to upgrade their qualifications. Similar scholarships are now being offered by NSW Department of Education and Communities, Early Childhood Education and Care Directorate (Productivity Commission Report on Government Services, 2014, NSW Government comments, p. 3.80). However, increasingly qualified staff are choosing to work part-time during the years when they have young children themselves. This increases the pressure on the Approved Provider to offer family friendly workplace and still comply with NQF.

Despite Cadetships continuing in our services, at the beginning of 2014 we have 3 vacant positions for qualified teachers to work in our Education and Care Services.

For example:

The current NSW Transitional and Savings provisions (Education and Care Services National Regulations, 2011, Reg 272) require a recognised teacher qualified educators to be in the service when there are 25 or more children. There are insufficient educators to meet this requirement and it has a detrimental impact on teaching and learning decisions. For instance if a qualified teacher is unwell they are under pressure to attend the service because of a lack of replacement staff. If there is a case meeting, program meeting or training session that would increase the effectiveness of service delivery or learning outcomes for children, the teacher may not be able to attend because there are no replacement educators to meet the requirement.

Recent changes to the National requirements have enabled Education and Care Services across other parts of Australia the flexibility to cover a short term absence of a qualified teacher with educators who hold alternative qualifications (Ref ACECQA Newsletter Number 16). This has not been implemented in NSW. The decision to continue the NSW Transitional and Savings Provisions in the National Education and Care Regulations, 2011 has increased the pressure on an already finite and overextended number of qualified teachers in rural services. Teachers feel compelled to attend when they or their dependent children are unwell and to structure their leave to be taken only when suitably qualified relief staff can be in attendance. There has been no indication of how NSW rural services are managing the constant threat of non-compliance with requirements to cover short term absences of educators with teacher qualifications.

Strategy

- 9.1 Apply the National requirements for early childhood teachers in attendance to NSW (Education and Care Services National Regulations, 2011. Reg: 132 – 135).

Recommendation 10: Provide moderation of Education and Care pre-service student competencies, learning outcomes and University subjects against the NQF.

Background/ Issue

Registered Training Organisations (RTO's) and Universities are responsible for preparing educators who are ready and qualified to work in the Education and Care industry. Rapid changes in the field under the NQF requires these organisations to undertake continued revision of competencies, learning outcomes and syllabus to ensure that new educators are well prepared to meet the demands of the industry. There have been a range of financial incentives for RTO's to provide Recognition of Prior Learning (RPL) to existing workers in response to educator shortages. As an employer of early childhood educators we have identified consistent knowledge gaps in recent graduates or in educators who have received RPL and who are applying for work in our services. These gaps suggest a lag between industry requirements and the training and education being provided by some RTO's and Universities.

For example:

In 2013, more than 30 applicants for a range of qualified and trained positions were asked at interview: *What is a Quality Improvement Plan. If you don't know how would you find out?* Three applicants were able to describe a Quality Improvement Plan (QIP). Another two to three applicants could identify the Australian Childrens Education and Care Quality Authority ACECQA website. The QIP is a central part of the NQF and an essential tool for all Education and Care Services.

The knowledge gaps we have seen in recent graduates suggests there is room for more rigorous moderation of courses and the learning outcomes of students, combined with a need for pre-service students to spend increased hours in professional practicum settings if they are to be industry ready.

Strategy

- 10.1 Continue moderation of pre-service training and qualifications against the NQF
- 10.2 Increase hours spent in supervised professional practicum settings for pre-service students.

Summary

In summary, we commend the scope of the *Enquiry into Education and Care Services*. The way forward for rural communities is to continue the Commonwealth and State Governments' investment in our future through early Education and Care services. We have identified a number of issues facing those involved in using, providing and working in Education and Care Services in rural communities. Our strategies are designed to begin a conversation about how to make our future a sustainable reality. We look forward to hearing further about the experiences and recommendations of others.

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