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**Productivity Commission Inquiry –Childcare and Early Childhood Learning**

I write on behalf of KCL Family Day Care and In Home Care services. We are a privately owned and operated service based in regional northern NSW that started in 2007.

The last 2 years have been gruelling for small business and especially the family day care sector. The majority of our Educators are based in small rural community’s dependant on farming and some industry.

**FAMILY DAY CARE**

*Ratios of children in care:*

* The reduction of the ratios of children in care has decreased access to child care in our areas, increased the cost to parents and service providers and also impacted on jobs within our coordination unit. The same amount of support and monitoring has to be provided with less financial gain.

*NQF and Education and Care Service National Regulations:*

* Our experience with the NQF process was inconsistent and disappointing
* Whilst both assessors were polite, they seemed uninformed and both had different ideas and interpretations of the quality areas. Two Educators were visited by one assessor and three by another, we are unsure if this gives a very accurate average of a service, as different ideas, values and understandings play a huge role in what is recorded.
* Prior to our assessment we were visited by an Authorised Officer who gave information about the Assessment process. The information given was incorrect and misleading. It appeared that there wasn’t a strong knowledge or understanding of the NQF process by this Authorised Officer to which we rely upon for guidance.
* Educators come from many different socioeconomic backgrounds and their homes, spaces and educating styles are all individual. Those who are assessed become responsible for the rating of a whole scheme. Assessing 5 educators from a field of 60 is not a very large average. If just one of those 5 Educators don’t interview well or take the pressure of the visit they can bring down the entire scheme’s rating. Each individual educator should be given the opportunity to be assessed and have their own quality rating and then the scheme itself.
* As a scheme that was rated high quality under NCAC to then only achieve a working towards within the new NQF was a disappointing result and fails to give me confidence in the change to NQF?
* Whilst we understand the need for reform and a higher learning quality for all children in care this process is not going to help sustain Educators and coordination units in the future unless the accreditation process shows a true picture of a services intentions and strengths. It is very disappointing to meet all elements in a quality area only to be marked down because of one working towards. The entire average of a scheme shouldn’t be brought down simply because of one working towards, as this then gives the overall perception that your service is only rated as working towards.
* No consideration has been given to the family day care sector in regards to the amount of documentation they are required to produce. The expectations of Family day care educators are not achievable without high turn overs and burn out, considering they are just one person. Family Day Care should not be compared or expected to run like long day care. Yes Educators should be professionals and the quality of care should not be any different but the regulations and evidence of quality assurance shouldn’t be the same.

*Overall funding and financial issues:*

* There is very little financial incentive to join this workforce.
* CCR payments should be direct to educators, no other option
* Parents who leave schemes or long day care with outstanding bills shouldn’t be allowed to access further CCB or child care until outstanding amounts are paid.
* Our scheme is eligible for Regional Travel Assistance Grants (RTAG). The guidelines and what can be claimed for have changed constantly over the 6 years we have been in business and also changes dependent upon who processes the claim in any quarter. The documentation required within the log books to be submitted has become a dreaded task by staff and anywhere from 2-3 days preparation from management before being submitted. The funding that is received is a small contribution towards the outlaid cost for fuel where prices are always fluctuating and the per KM reimbursement rate paid to staff. Not to mention the threshold of KM’s needed to be travelled by a scheme before we are able to claim. As this funding is processed at the end of a quarter, we have been left waiting up to 3 months to have our claim paid, leaving us 6 months in arrears.
* No financial aid has been given to schemes to implement and monitor the NQF
* No financial assistance is provided to co-ordination units for their work towards Inclusion support applications, when they are required to do all the work.

**In Home Care**

Our In Home Care service is needed and valued by farming families who don’t have any other option of child care because there aren’t any other services. We have had a waiting list of 12 or more families who are eligible for the service for over 3 years. We were overlooked for places in the last two releases. Parents don’t understand the capped place system and can’t understand why they have been on a waiting list for so long.

It would be beneficial if services could apply for emergency places for short periods of time or at least have the opportunity to apply for further places more regularly. Since the take back of places was announced none have then filtered back through to those of us waiting on places. This service could help so many people and provide much needed employment in our regional areas.

The structure of the assessment of used EFT places is done on a weekly basis, to ensure a scheme has complied with their funding agreement. It is very difficult to achieve the correct capped EFT amount on a weekly basis, which only come in upon the commencement of the CCMS system. If schemes were once again to calculate their capped EFT on a quarterly basis this would be far easier to comply especially when school holiday periods cause high fluctuation of numbers.

Nannies are hired within the family home to provide more than just child care. In home care is strictly to educate children within the family home and provide care. Whilst I respect the Nanning industry, I don’t believe that child care benefit should be payable, simply because this funding will be paying for tasks other than child care. In Home care is an already well-established option for child care within the family home. It is regulated and carefully monitored by schemes such as ours. We strongly believe it will be an injustice to overlook the current IHC model to start funding Nannies.