



## **Mobile Children's Services Association of NSW Inc.**

***Mobile Children's Services //  
access.everywhere***

### **Submission**

**Productivity Commission**

**Inquiry into Childcare and Early Childhood Learning**

**Author: Tim Keegan  
Executive Officer**

MCSA  
PO Box 39  
Boolaroo 2284

**February 2014**

## **Content**

<b>Recommendations</b>	<b>4</b>
<b>1. Introduction</b>	<b>8</b>
<b>2. About Mobile Children’s Services in NSW</b>	<b>11</b>
<b>3. The big picture</b>	<b>12</b>
[i] One Strategy to rule them all: A child focused, high quality, early childhood development service system	
[ii] Right of access	
[iii] Getting on with the job – The full National Early Childhood Development Strategy	
[iv] Rationalising the CCB/CCR system	
[v] A more effective <i>National Partnership Agreement on Early Care &amp; Education</i>	
<b>4. Intentionality: Better Funding Program Design</b>	<b>16</b>
[i] A funding program designed for flexibility & responsiveness	
[ii] The Budget Based Funding Program as it stands and what it could be	
[iii] Making ‘access’ real: A font of funds	
[iv] Making ‘access’ real: Expanding Mobile Child Care Services	
[v] Making ‘access’ real: Expanding Mobile Playsession Services	
<b>5. Intentionality: Better planning mechanisms</b>	<b>20</b>
[i] Getting a picture of the early education and care system in Australia	
[ii] Calling all stakeholders!	
[iii] Drilling down: Proactive planning: Mobile Child Care Services in remote, rural and regional communities	
[iv] Drilling down: Proactive planning: Mobile Playsession Services in remote, rural and regional communities.	
<b>6. Intentionality: Reform to funding administration</b>	<b>22</b>
[i] Recognising the real cost of service delivery	
[ii] Operational funding	
[iii] Keeping up with the real cost of service delivery	
[iv] Flexible funding and long term service planning	
[v] A principle for more effective service sponsorship	
[vi] Re-instating access to 2006/2007 levels of service delivery	
<b>7. Other educationally focused, early childhood development services</b>	<b>27</b>
<b>8. Supporting children with additional needs</b>	<b>27</b>
[i] Additional needs: Mapping the system and building on current infrastructure	
[ii] Additional needs: What real support for early intervention looks like	
[iii] Early Intervention: Reforming funding program guidelines	
<b>9. Supporting Indigenous children</b>	<b>29</b>

<b>10.</b>	<b>Service Quality and Regulation</b>	<b>30</b>
[i]	Transition to the National Quality Framework: Transition soonish!	
[ii]	Transition to the National Quality Framework: Accounting for the cost of quality	
[iii]	Quality standards for non-regulated BBFP funded Mobile Services	
[iv]	High quality practices: Networking and collaboration	
<b>11.</b>	<b>The early education and care workforce</b>	<b>32</b>
<b>12.</b>	<b>Supporting service development &amp; high quality in Mobile Services</b>	<b>33</b>
[i]	Supporting service development and high quality in Mobile Children's Services	
<b>13.</b>	<b>Conclusion</b>	<b>34</b>
	Attachment 1: <i>Mobile Children's Services – What's the big idea</i>	<b>35</b>
	Attachment 2: <i>MCSA's Statement on the National Quality Framework</i>	<b>42</b>
	Attachment 3: <i>An Introduction to Mobile Children's Services in NSW</i>	<b>47</b>

## Recommendations

### 3. The big picture

#### [i] One Strategy to rule them all: A child focused, high quality, early childhood development service system

**MCSA Recommendation 3.1:** That the Australian Government's educationally focused, early childhood development policy and practice be redeveloped to align with the vision and outcomes of *Investing in the Early Years: A National Early Childhood Development Strategy*.

#### [ii] Right of access

**MCSA Recommendation 3.2:** That a right to access educationally focused, early childhood development services be built into a redeveloped Australian Government childcare and early learning program.

#### [iii] Getting on with the job – The full National Early Childhood Development Strategy

**MCSA Recommendation 3.3:** That the Australian Government further engage with State Governments through the COAG process to implement the full vision of the National Early Childhood Development Strategy.

#### [iv] Rationalising the CCB/CCR system

#### [v] A more effective *National Partnership Agreement on Early Care & Education*

**MCSA Recommendation 3.4:** That the Australian and State Governments, through the COAG process, rationalise and make effective the provision of funds under the *National Partnership Agreement on Early Care and Education* to the effect that the States have a clear idea of the amount and timing of a guaranteed level of funds available to them, three years in advance.

### 4. Intentionality: Better Funding Program Design

#### [i] A funding program designed for flexibility & responsiveness

#### [ii] The Budget Based Funding Program as it stands and what it could be

**MCSA Recommendation 4.1:** That the Budget Based Funding Program be renamed and retooled to reflect a status and intent as the location of responsive, flexible and innovative educationally focused, early childhood development services [FLECS].

#### [iii] Making 'access' real: A font of funds

**MCSA Recommendation 4.2:** That the Australian Government change CCB/CCR arrangements to allow the release of funds for the expansion of Budget Based Funding Program services into underserved areas.

**[iv] Making ‘access’ real: Expanding Mobile Child Care Services**

**MCSA Recommendation 4.3:** That a redeveloped Budget Based Funding Program have a funding mechanism to allow for ‘growth’ of the LDC-like Mobile Child Care Services in non-metro communities.

**[v] Making ‘access’ real: Expanding Mobile Playsession Services**

**MCSA Recommendation 4.4:** That a redeveloped Budget Based Funding Program have a funding mechanism to allow for ‘growth’ of Mobile Playsession Services to enable coverage of all rural and remote areas as well as address unmet demand in current areas of coverage.

<b>5. Intentionality: Better planning mechanisms</b>
------------------------------------------------------

**[i] Getting a picture of the early education and care system in Australia**

**MCSA Recommendation 5.1:** That DE conduct an Australia-wide asset and gap analysis, at sub-regional level, for the purpose of describing the local early child development system.

**[ii] Calling all stakeholders!**

**MCSA Recommendation 5.2:** That statutory bodies and regional development organisations funded by the Australian Government be partners in ensuring that children, their families and communities have access to affordable, high quality, educationally focused Early Childhood Development services.

**[iii] Drilling down: Proactive planning: Mobile Child Care Services in remote, rural and regional communities**

**MCSA Recommendation 5.3:** That DE conduct a tri-annual asset and gap analysis to identify sub-regions, Australia-wide, where new Mobile Child Care Services are warranted or where existing Mobile Child Care Service can extend their offerings.

**[iv] Drilling down: Proactive planning: Mobile Playsession Services in remote, rural and regional communities.**

**MCSA Recommendation 5.4:** That DE implement a tri-annual asset and gap analysis to identify sub-regions, Australia-wide, where new Mobile Playsession Services or additional or extended Mobile Playsession Services sessions are warranted.

<b>6. Intentionality: Reform to funding administration</b>
------------------------------------------------------------

**[i] Recognising the real cost of service delivery**

**MCSA Recommendation 6.1:** That funding levels in the Budget Based Funding Program recognises the real cost of service delivery.

**[ii] Operational funding**

**MCSA Recommendation 6.2:** That funding under the BBFP continue as operational funding.

**[iii] Keeping up with the real cost of service delivery**

**MCSA Recommendation 6.3:** That the Budget Based Funding Program should absolutely ensure that annual grant indexation is at a level that enables funded services to maintain the level and quality of service delivery.

**[iv] Flexible funding and long term service planning**

**MCSA Recommendation 6.4:** That Mobile Children's Services in the Budget Based Funding Program be funded on a five year 'contract for service' basis which includes a capacity for a review of funding level to meet changes in demand.

**[v] A principle for more effective service sponsorship**

**MCSA Recommendation 6.5:** That Budget Based Funding Program administration principles favour and fund multi-aspice arrangements under the Budget Based Funding Program.

**[vi] Re-instating access to 2006/2007 levels of service delivery**

**MCSA Recommendation 6.6:** That the Australian Government ensure that the funding level of BBFP services throughout Australia is enough to reinstate or maintain the level of service delivery of 2006/2007, with up to date affordability, quality and safety standards.

<b>7. Other educationally focused, early childhood development services</b>
-----------------------------------------------------------------------------

**MCSA Recommendation 7.1:** That the Australian Government examine the utility of the *Remote and Isolated Children's Exercise* and *Remote Area Family Services* projects in addressing access in very remote communities and properties with the intention of extending the models to other jurisdictions.

<b>8. Supporting children with additional needs</b>
-----------------------------------------------------

**[i] Additional needs: Mapping the system and building on current infrastructure**

**MCSA Recommendation 8.1:** That the Australian Government builds on the current early care and education infrastructure in rural and remote communities to support all aspects of early intervention.

**[ii] Additional needs: What real support for early intervention looks like**

**MCSA Recommendation 8.2:** That funding programs supporting children with additional needs provide funding for dedicated staff hours to support children through all the different phases and aspects of their work with children and their families.

**[iii] Early Intervention: Reforming funding program guidelines**

**MCSA Recommendation 8.3:** That the guidelines for the Inclusion Support Program and other additional needs support programs be reviewed to account for the circumstances of children in isolated circumstances and the operational circumstances of ECE services that support them.

## 9. Supporting Indigenous children

**MCSA Recommendation 9.1:** That educationally focused, early childhood development services be substantially free for Indigenous children.

## 10. Service Quality and Regulation

### [i] Transition to the National Quality Framework: Transition soonish!

**MCSA Recommendation 10.1:** That regulated Mobile Children's Services become in-scope under the NQF.

**MCSA Recommendation 10.2:** That the 2014 review of the National Quality Framework provide the capacity for each jurisdiction to transition their non-NQF services into the NQF when deemed ready.

### [ii] Transition to the National Quality Framework: Accounting for the cost of quality

**MCSA Recommendation 10.3:** That extra renewable funds be provided to regulated Mobile Children's Services to cover any extra costs in service delivery, including capital costs, due to services transitioning to the NQF.

### [iii] Quality standards for non-regulated BBFP funded Mobile Services

**MCSA Recommendation 10.4:** That non-regulated, Budget Based Funding Program Mobile Services be subject to a *Code of Practice for Mobile Playsession Services* adapted from the *Early Years Learning Framework* and the *National Quality Standard*.

### [iv] High quality practices: Networking and collaboration

**MCSA Recommendation 10.5:** That the Budget Based Funding Program guidelines value and fund dedicated collaboration and networking in the Early Childhood Development service system and support this through a state-wide, sub-regionally focused asset and gap analysis.

## 11. The early education and care workforce

**MCSA Recommendation 11.1:** That Recommendations 9.1, 9.2 and 10.7 of the Productivity Commission's Research Report *Early Childhood Development Workforce* be implemented in support of the rural and remote ECEC workforce.

## 12. Supporting service development & high quality in Mobile Services

### [i] Supporting service development and high quality in Mobile Children's Services

**MCSA Recommendation 12.1:** That a dedicated, Australia-wide, Mobile Children's Service representation and resourcing project be funded to facilitate service development and the transition of Mobile Children's Services into the NQF as well as support non-regulated services to implement a Code of Practice for their service type.

-----

## 1. Introduction

### ***Mobile Children's Services // Access.Everywhere***

This is MCSA's submission to the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning*.

The Mobile Children's Services Association of NSW Inc. [MCSA] is the peak advocacy and resourcing agency for Mobile Children's Services in NSW.

MCSA views the Productivity Commission's inquiry as an opportunity to:

- Emphasise the important role of high quality early childhood development services in improving outcomes for children, particularly those in isolated circumstances
- Emphasise that childcare and early learning is an investment by the community and that the best interests of children are the paramount consideration
- Consolidate and improve the current funding and regulation systems for Mobile Children's Services
- Promote a service system and services that are shaped around the circumstances and needs of children and their parents and communities
- Develop a mechanism for Mobile Children's Services to 'grow' to address the lack of access to high quality, affordable, educationally focused, early childhood development services, particularly in regional, rural and remote communities.
- Promote early care and education services, outside the Long Day Care service system, that are flexible, responsive and particularly suited to supporting children with additional needs, Indigenous children and children in disadvantaged circumstances
- Promote ECEC Services that support parent/carers by providing respite and care whilst they address life concerns.

The first priority of the educationally focused, early childhood development [ECD] system in Australia must be that it strives to achieve the vision of *Investing in the Early Years – A National Early Childhood Development Strategy* [NECDS] where "all children have the best start in life to create a better future for themselves and for the nation"

In the long term, other community objectives of a competitive economy, productive workforce and decent communities flow from this vision and are subsidiary to this vision.

There are one hundred and ten Mobile Children's Service 'projects' operating in NSW supporting:

- Thousands of children and their families
- In hundreds of communities – Remote, rural, regional and metro
- In a range of ways - See [Attachment 2](#) for a description of the different service types

Mobile Children's Service's break down the barriers of isolation by providing services which are responsive to the particular circumstances and needs of young children and their families in both geographical and 'population group' communities: Isolation may be geographic, social, cultural or economic as well as a combination of these.



**There are still children throughout Australia without access to affordable, high quality, educationally focused, early childhood development services.**

Mobile Children's Services are a major service type/strategy that can provide access for many of these children, their families and communities in a manner that is flexible and responsive to local circumstances: These are the 'fit for purpose' services of the *National Early Childhood Development Strategy*.

In terms of the Productivity Commission inquiry's broad brief, Mobile Children's Services are part of a nation-wide 'collection' of 'mobile' services. The inquiry has the potential to make this nation-wide 'collection' into an 'intentional', 'purpose built', nation-wide 'service system' supporting 'access', particularly in regional, rural and remote communities.

Australians have a facility for taking an issue and putting in place practical and durable solutions.

A 'system' of Australia-wide, Mobile Children's Services addressing access is one such practical and durable solution.

MCSA believes that the regulation of those Mobile Children's Services [Providing licensable 'care' for young children as Approved Services], nation-wide, should be in-scope under the National Quality Framework [NQF].

This submission argues the case for inclusion and describes steps towards this result.

To achieve better 'access' outcomes, MCSA believes that a lot more work must be done to improve the funding mechanism for those Mobile Children's Services funded under the Australian Government's Budget Based Funding Program [BBFP].

To achieve better 'access outcomes', MCSA believes that a lot more work has to be done to improve the vision and funding mechanisms for NSW Government funded Mobile Children's Services.

This requires a national approach to childcare and early learning, best conceived under the COAG endorsed NECDS.

To achieve better 'access outcomes', the effectiveness of the funding mechanisms between the State and Australian Governments must be improved.

Most of the licensed Mobile Children's Services in NSW are Mobile Preschools, operating with significant funding under the *National Partnership Agreement on Early Childhood Education* [NPA-ECE], attempting to deliver 'universal access' to high quality early childhood education in the year before full time school.

The Australian/NSW Government funding arrangements in this NPA are a dog's breakfast. The arrangements absolutely threaten the objectives of the NPA and the ability of the NSW Government to actually provide 'universal access'.

To achieve better outcomes for children, the Australian polity needs to conceive of childcare and early learning, under the NECDS, as an investment.

The fetish with 'budget emergencies' is an ideological construction, based on failed market economy assumptions that, amongst other things, do not hold up to the fact that Australia does OK on 'government debt/expenditure to GDP' ratios compared to equivalent first world countries.

Invest!!

Whilst Australian Government expenditures do need to be scrutinised and programs provide good value for money, the PC inquiry's restrictive terms of reference regarding sticking to the current funding available is not useful in this situation.

The Productivity Commission should argue for changes to program parameters/reallocation of funds or extra funds, for specific purposes, where it is shown that the current level of funding is not up to the task of achieving the result of universal access to affordable and high quality childcare and early learning services.

Mobile Children's Services are a way of providing educationally focused, ECD activities to children, their parents and communities who would otherwise have no or limited access.

'Mobile' is a model of service delivery: A service system response to a lack of access.

'Mobility' is about fair and reasonable access.

As well, 'mobility' is often an alternative service system approach for engaging and supporting 'communities of interest' on important issues, such as supporting parents in their parenting role, as a child's first teacher, in transition to school and on early intervention.

Mobile Children's Services are an effective strategy where it is not possible or economic for services users to travel to a service 'centre', where centre-based services are not yet available or would never be available, where the market fails to provide a service or where there is a need for flexibility and responsiveness in community engagement and support.

The different Mobile Children's Services types, in their own way and with different emphasise, are about access, engagement and support.

Instead of the community going to a service 'centre', the service goes to the community, however defined, wherever located.

Any children's service can be put on wheels and travel to a community.

Service systems and attendant funding, regulation, safety and quality assurance systems should be designed to include a mechanism that provides for responsive and flexible early childhood services [FLECS].

This submission describes Mobile Children's Services, their place and potential in an integrated, educationally focused, ECD system, as well as canvasses issues related to access, quality standards, funding mechanisms, unmet demand and regulatory and quality assurance systems.

There are still children throughout Australia without access to affordable, high quality, educationally focused, early childhood development services.

Finally, MCSA does not speak for Mobile Children's Services Australia-wide.

MCSA has a strong relationship with the National Association of Mobile Services [NAMS] and our views on the following issues are similar.

NSW has the pre-eminent system of Mobile Children's Services in NSW – These would be helpful as models to be investigated for other jurisdictions.

As well, some of the Mobile Services in other jurisdictions offer services not available in NSW, particularly those that are provided in very remote areas and those offering on-property childcare and early learning. These should be investigated for their potential utility Australia-wide.

MCSA is keen to work with the Australian Government, as it does with the NSW Government, to improve access.

MCSA endorses the submission of the NSW Children's Services Forum.

## **2. About Mobile Children's Services in NSW**

There are one hundred and ten Mobile Children's Service projects throughout NSW.

Mobile Children's Services are 'fit for purpose', educationally focused, early childhood development services, working in isolated communities.

Children, their parents and communities have a range of needs when it comes to early childhood development.

Mobile Children's Services respond to these needs by delivering a range of activities to their communities. This is why they are 'fit for purpose': Responsive to the circumstances and needs of their stakeholders and flexible in their service delivery.

This responsiveness and flexibility has led to the development of several types of Mobile Children's Service, often mirroring centre-based, 'come to us' services: Mobile Preschool, Mobile Child Care [LDC-ish], Mobile Occasional Care, Mobile Playsession, Mobile Toy Library, Mobile Adjunct Care and, often, combinations of different service strategies in the one Mobile Service, particularly in the more geographically isolated areas.

The majority of Mobile Services in NSW are funded by the NSW Department of Education and Communities [DEC] under the Early Childhood Education and Care Grants Program.

Most DEC funded services provide formal 'care' and are regulated children's services.

There are fifty Mobile Preschools in NSW, each usually working in up to four communities.

As well, the NSW Government, through the Department of Education and Communities, funds thirty Mobile Playsession, Toy Library, Occasional Care and Adjunct Care Services.

These are all invaluable elements of local service systems and should be conceived of, again, as 'fit for purpose' childcare and early learning services addressing the outcomes of the NECDS.

The Federal Department of Education [DE] funds sixteen Mobile Children's Services through the Budget Based Funding Program [BBFP]. Six of these are Mobile Child Care Services – They provide 'care' similar to their centre-based, Long Day Care counterparts and are therefore regulated.

Even most of the ten, DE funded Mobile Playsession Services, where parents technically 'care' for children, are regulated on the basis that they occasionally provide formal care at community events: Flexibility for rural and remote communities!

All up, Sixty Mobile Children's Services are regulated as 'state regulated early education and care services' under the *Children's [Education and Care Services] Supplementary Provisions Regulation 2012*.

See Attachment 1 for a description of the service system characteristics and role of Mobile Children's Services in the early childhood development service system.

See Attachment 2 for a detailed description of types of Mobile Children's Services in NSW.

See Attachment 3 for a more detailed description of the regulation of Mobile Children's Services in NSW and an argument for inclusion in the National Quality Framework [NQF].

### **3. The big picture**

#### **[i] One Strategy to rule them all: A child focused, high quality, early childhood development service system**

The one hundred and ten Mobile Children's Service projects in NSW are an important component of NSW's educationally focused, early childhood development [ECD] service system.

However, there is no notion or practice at the State or Australian Government levels that forcefully implements the concept of an integrated, 'educationally focused, ECD service system'.

See Attachment 1 for a description of Mobile Children Services in NSW and their 'fit' within the wider educationally focused, ECD sector and the other systems of support which enables children to achieve their potential.

From a systems perspective, it is useful to conceive of the role of Mobile Children's Services and other educationally focused, ECD services by employing the *National Early Childhood Development Strategy: Investing in the Early Years* as a framework.

The *National Early Childhood Development Strategy: Investing in the Early Years* [NECDS] is a well thought out, 'big picture' strategy bringing together the diverse elements of the Australian way of doing things [Practical and durable solutions] to the effect that, with everyone working together, children "have the best start in life".

The NECDS also outlines both the economic and early intervention argument for early education and care.

Australian and State Governments have signed on to this strategy through the Council of Australian Governments [COAG] process and attendant National Partnership Agreements.

Many of the matters that the Productivity Commission inquiry is reviewing have been generated by the NECDS.

The NECDS outlines ways that the early childhood 'service system' can contribute to the 'best start in life' vision.

This includes ensuring the provision of good quality early childhood education and care services, supporting parents in the many aspects of their parenting role [Including as educators], articulating the different levels of service system intervention and valuing

inter/intra-sector collaboration: A structured and holistic approach to the many practices and issues that impact on the development of children in their very different circumstances.

The NECDS describes what we know about the best way to support children, their families and communities. It is evidenced based and is underlain by Urie Bronfenbrenner's ecological model: *The ecology of human development* [1979].

In order to achieve a child focused, high quality, educationally focused service system and for quality, access and affordability to be available for all in their particular circumstances, it is appropriate that the NECDS underpins all aspects of ECD in Australia, at all government levels, and that the *Strategy* frames both funding and regulation.

**MCSA Recommendation 3.1:** That the Australian Government's educationally focused, early childhood development policy and practice be redeveloped to align with the vision and outcomes of *Investing in the Early Years: A National Early Childhood Development Strategy*.

## **[ii] Right of access**

Children, their parents and communities should have a right to access high quality, affordable, educationally focused, ECD services in an integrated service system.

To a great extent, this right of access is built into the CCB/CCR system for access to Long Day Care [LDC].

Within the parameters set out by the legislation, an LDC provider can set up anywhere a provider thinks they can succeed and parents have automatic access to public funding.

Yet, there are many children who cannot access LDC because the CCB/CCR legislation limits both the circumstances in which LDC can operate and children and their parents can access CCB/CCR.

Poor financial viability in low utilisation services works against centre-based LDC location in isolated communities be they geographically, culturally or economically isolated or a combination of these.

LDC has many benefits for all stakeholders, in the short to long term, above and beyond a workforce rationale.

### **The current CCB/CCR/LDC system discriminates against children in isolated circumstances.**

There are many ways to address the limitations to access built into the current system.

For example, Mobile Child Care Services [LDC-ish], funded under the Budget Based Funding Program [BBFP], offer a solution to this discrimination. This has been a matter for discussion in the review of the BBFP: See later for discussion about unmet demand and the need for a service system 'growth' mechanism.

In NSW, the National Partnership Agreement on Early Childhood Education [NPA-ECE] has been deployed to fund access to community-based Preschools, including fifty Mobile Preschools.

A new funding mechanism is being developed for Mobile Preschools to consolidate the current services as well as lead to growth in service delivery to address unmet demand.

See later for discussion about inefficiencies in funding administration between State and Australian Governments under the NPA-ECE.

Any reforms to the current system should include a right to access and a mechanism designed to address lack of access.

Part and parcel of mechanisms designed to address a right of access is reform of the funding of services under the BBFP, including access to the level of financial support routinely available to most Australian children.

Part and parcel of reform should be a COAG led process to both implement the full NECDS vision and develop funding program design and program planning mechanisms that ensure the right to access is a reality for young citizens.

**MCSA Recommendation 3.2:** That a right to access educationally focused, early childhood development services be built into a redeveloped Australian Government childcare and early learning program.

### **[iii] Getting on with the job – The full National Early Childhood Development Strategy**

The collaboration between the Australian Governments and the States that led to the *National Partnership Agreement on Early Childhood Education* [NPAECE] and 'Universal Access to ECE', as well as the NQF, **should continue in order to achieve the full vision of the NECDS and continue with the unfinished business of the NPA ECE.**

Again, this would mean a COAG led process to put in place the vision, objectives and strategies in the NECDS and engage State Government's to rationally plan their own ECE systems, including those services that complement the mainstream regulated ECE services such as Occasional Care, Playsession Services, Toy Libraries, Adjunct Care Service and their Mobile equivalents.

See later for comments on the funding of ECE in Australia in general and the administration of NPA-ECE funds in particular.

**MCSA Recommendation 3.3:** That the Australian Government further engage with State Governments through the COAG process to implement the full vision of the National Early Childhood Development Strategy.

### **[iv] Rationalising the CCB/CCR system**

MCSA's main focus in this submission is on access for children and the role Mobile Children's Services can play in making 'real' access happen.

As such, MCSA's focus is on the effectiveness of the Australian Government's Budget Based Funding Program and the NSW Government's funding programs for children in isolated circumstances.

See next section for comment on the National Partnership Agreement on Early Care and Education where Australian Government funds are used to provide Preschool in NSW.

**MCSA notes the difficulties parents and services have in negotiating the CCB/CR funding system and supports the work of Early Childhood Australia, including all aspects of their submission to this review, in rationalising funding arrangements.**

**[v] A more effective *National Partnership Agreement on Early Care & Education***

The NSW Government has put in considerable effort since 2006 to improve the viability of its +800 community-based Preschools and improve many aspects of funding administration.

The NSW Government gradually invested an extra \$30m per annum into the system from 2006 under the *Preschool Investment and Reform Program* [PIRP].

Some PIRP funds were intended to boost the viability of current services and lower fees via a better level of funding.

Some PIRP funds were intended to boost the number of places available for Preschool and thus increase access.

Several new Mobile Preschools were developed under the *Preschool Growth Program* element of the PIRP. Other Mobile Preschools added extra days and venue.

Some BBFP funded Mobile Child Care Service received these funds to expand.

The extra \$30m was only ever enough to bring many of the services back up to being financially viable and lower some fees, the main barrier to access in NSW.

On paper, the *National Partnership Agreement on Early Care and Education* [NPA-ECE] could have 'rescued' the NSW Preschool 'service system' by injecting large amounts of funds under the 'universal access' initiative.

Whilst the original sums earmarked for NSW under the Bilateral Agreement for the NPA-ECE were considerable, these funds have not been made available to NSW at the level written into the agreements and certainly have not been delivered in a timely way.

The Australian and NSW Governments have their 'takes' on why this has been/is so.

For whatever reason, this has meant that the NSW Government has struggled to develop a cohesive, long term financial strategy to combine Australian and State Government funds for increasing access and making for real affordability.

The chopping and changing in the principles of funding and the series of one-off grants for specific purposes [A sure sign of instability in financial management] has been an administrative nightmare for funders and providers.

The *Review of NSW Government funding for Early Childhood* [April 2012] by Professor Deborah Brennan has provided a clear path for funder and providers to 'stabilise the patient' and work on viability, affordability and access issues.

Unfortunately, the NSW Government relies on significant funds from the Australian Government and is still in a poor position to plan more than 12 months ahead because these funds may or may not arrive at the level projected or arrive in a timely way.

MCSA believes the NSW Government should also inject a considerable amount of funds, as renewable funds, as recommended by the Brennan Review.

MCSA notes that a critical issue is the ability of some centre-based Preschools to afford renting their premises in metro and some regional areas.

**MCSA notes that the NSW Government is developing a new funding model for Mobile Preschools. This model should establish a functional relationship between the cost of delivering a high quality, affordable and**

**safe service and the level of funding available from Government: Mobiles are cost effective, they are not cheap.**

At the big picture level, there is instability in intergovernmental funding arrangements and, on the ground, this is not helping service viability, affordability and the work that needs to be done to meet the universal access guarantee.

Funds under the current NPA-ECE are now only available to the end of 2014.

It is critical that these funds continue to be provided to NSW at a significant level and in a timely way.

**MCSA Recommendation 3.4:** That the Australian and State Governments, through the COAG process, rationalise and make effective the provision of funds under the *National Partnership Agreement on Early Care and Education* to the effect that the States have a clear idea of the amount and timing of a guaranteed level of funds available to them, three years in advance.

#### **4. Intentionality: Better Funding Program Design**

##### **[i] A funding program designed for flexibility & responsiveness**

If **all** children, their parents and communities are to have access to high quality, affordable, educationally focused ECD services, both the funding and regulation of the service system needs to be as flexible and responsive as the services who now provide the access.

This section of the submission focuses on the need for effective funding program design.

The next section focuses on attendant service system planning, where ‘intentionality’ hits the ground running.

MCSA is mindful of the separate spheres of action between the Australian and State Governments as well as the interactions where the Australian Government funds the States for particular purposes and outcomes.

MCSA canvassed the issue of the design of funding programs in our submission to the review of the Budget Based Funding Program [BBFP].

It is useful to use the BBFP as the frame for discussing access issues as it is the Australian Government’s current mechanism for providing flexible and responsive ECD services, particularly to rural, regional, remote and Indigenous communities.

There is much that can be done to reform the BBFP to make the program an effective vehicle for addressing no or relatively low access to ECD services.

A good result from the PC inquiry would be a reformed early childhood education and care service system that is integrated and **intentionally devised**, where gaps are identified and action taken to meet demand.

That is, again, systems and services are shaped to the circumstances and needs of children and their families and communities.



### **[ii] The Budget Based Funding Program as it stands and what it could be**

As there is a rich tapestry of service types in the BBFP and these offer very different activities adapted to their local communities, it seems that, by hook or by crook, the program does create flexibility and allow innovation and responsiveness to changing need.

This is so even within the financial constraints of the BBFP funding arrangements. – See later.

Being flexible, responsive and innovative is certainly true of the Mobile Children's Services in the BBFP whose bread and butter is flexibility and responsiveness to changing need.

MCSA notes that 'on the ground services' often have to stretch BBFP guidelines to make their services relevant to local needs.

The service types in the BBFP are really a bundle of standard service practices adapted to local circumstances and need, with some core practices.

There are many outstanding examples of flexibility and innovation in the way the strategies/practices are delivered.

Whilst Mobile Services have got along very well with the funding department, now DE, and have been well supported in their endeavours, the incongruence between what they do and what some aspects of the guidelines require should be rectified.

The BBFP needs to catch up with what is now on the ground. This is best served by redeveloping the BBFP as the 'flexible, responsive, innovative, educationally focused, ECD services, rural, regional, remote and Indigenous sub-program of the Child Care Services Support Program [CCSSP].

Again, the sub-program's big ideas should be informed by the NECDS. This will capture all current BBFP service types, providing vision and outcomes, locating them as components of the ECD service system and guiding prioritisation of locations and demographic groups to be provided a service.

**MCSA Recommendation 4.1:** That the Budget Based Funding Program be renamed and retooled to reflect a status and intent as the location of responsive, flexible and innovative educationally focused, early childhood development services [FLECS].

### **[iii] Making 'access' real: A font of funds**

Whilst the BBFP guidelines can be rewritten to capture the work on the ground and this will legitimate and guide the work into the future, consideration needs to be given to breaking out of the constraints in the BBFP's funding allocation to allow for growth of this component of the ECD service system.

Funds need to be available to make 'access' a reality and more than just a policy objective or empty rhetoric.

In the first instance, this could mean the ability to use the 'uncapped' CCB/CCR allocated funds to expand current provision by BBFP as well as develop new provision.

See next section on how Mobile Children's Services can expand to address unmet demand in non-metro areas.

This would move the open slather, uncapped planning and funding allocation system in Long Day Care to an intentional and evidence based mode of service system planning for those children, parents and communities who do not have reasonable access to an ECD service.

**MCSA Recommendation 4.2:** That the Australian Government change CCB/CCR arrangements to allow the release of funds for the expansion of Budget Based Funding Program services into underserved areas.

#### **[iv] Making ‘access’ real: Expanding Mobile Child Care Services**

The six BBFP funded Mobile Children’s Services providing LDC-like regulated ‘care’ for children [Mobile Child Care Services] in NSW should be allowed to ‘grow’ by the provision of service to new communities and additional provision to current communities.

This model is tried and true in NSW, Victoria and South Australia.

Whilst MCSA does not speak for Mobile Children’s Services Australia-wide, we understand the same unmet demand/need for growth applies in other jurisdictions.

Not only can current services grow, there are many unserved communities that would benefit from this strategy.

There has been abundant anecdotal evidence that the parents in local communities want extra days, venues and longer hours: See later for a recommendation about an Australia-wide asset and gap analysis to establish an evidence base about the areas of potential coverage and unmet demand for this type of service.

The proven utility of these services in NSW, supported by a very effective approach to the regulation of ECE services working in non-purpose built facilities, makes them good prospects for piloting a better approach to system planning as well as growing that system in un/underserved communities.

The BBFP needs a mechanism to allow for growth to address lack of access to services offering regulated care.

**MCSA Recommendation 4.3:** That a redeveloped Budget Based Funding Program have a funding mechanism to allow for ‘growth’ of the LDC-like Mobile Child Care Services in non-metro communities.

#### **[v] Making ‘access’ real: Expanding Mobile Playsession Services**

The ten BBFP funded Mobile Children’s Services providing structured, early childhood playsessions throughout rural and remote NSW should be allowed to grow by the development of new services to areas where there is no coverage or by additional provision to current communities where there is unmet demand.

Whilst MCSA does not speak for Mobile Children’s Services Australia-wide, we understand the same situation applies to similar services in other jurisdictions.

The following discussion applies equally to BBFP service types other than Mobiles.

These services are strategically located in the nodal towns of rural and remote NSW, with some districts still lacking access. They cover vast distances. Often having up to ten venues, they deliver a service over fortnightly to two-monthly cycles.

Many sponsor other ECD services or are themselves embedded in larger ECD services making for local integration and collaboration.

Although these services do not generally provide 'regulated' care, and those that do only provide 'care' occasionally, these services are exemplars of educationally focused, ECD services addressing the broader outcomes of the National Early Childhood Development Strategy, working in different ways towards the same vision.

The context and focus of service provision is different to the 'care' providing sector: Other child development issues and support strategies are brought to bear.

Mobile Playsession Services support early childhood development through structured play sessions for children.

They support parents on the many aspects of their parenting, often being first port of call on an ECEC service in many localities, facilitating access to local ECEC services, supporting on additional needs, providing important parenting information and referral as well as facilitating transition to school.

Their bread and butter is connecting child to child and parent to parent to foster and facilitate 'community': Mobile Playsession Services are the modern day village pump and great generators of social capital.

These services generally have a 'toy library' component [EC equipment such as toys, books and other educational material]. The rationale: Supporting the development of children through the provision of quality early childhood equipment and resources as well as a very strong element of supporting parents in their role as educators.

The strong element of supporting parents in their various roles, through listening, information, discussion, advice and referral to other agencies must be highlighted. The parents are at the 'play sessions': This is ideal for informal conversations.

In the service system, they are the less formal, 'non-stigmatising entry points': Trusted and embedded in their communities.

They are services mostly providing 'Universal access' rather than 'targeted' or 'intensive support', although they respond to the different communities in their area of coverage and can be seen as an effective, alternative service system approach to engaging and supporting 'communities of interest' on important issues.

They also provide a different strategy to regulated ECEC services to achieve the same result, perhaps about immunisation, exercise, nutrition, child development knowledge, managing child behaviour, child protection or school readiness.

For example, the issue may be about the value of attending care providing EC services. The non-regulated services are important information disseminators, referral agents and stepping stones to the regulated EC services.

These services are often referred to as 'drought relief' for the support they give to families and communities during testing times.

These activities all accord with the vision, outcomes and strategies of the NECDS.

In NSW, these services mostly report increasing local population and demand.

**MCSA Recommendation 4.4:** That a redeveloped Budget Based Funding Program have a funding mechanism to allow for ‘growth’ of Mobile Playsession Services to enable coverage of all rural and remote areas as well as address unmet demand in current areas of coverage.

## **5. Intentionality: Better planning mechanisms**

### **[i] Getting a picture of the early education and care system in Australia**

The Australian Government’s main program for delivering early education and care services to Australian parents, Long Day Care, has floated on with the occasional spasms of intentionality to address the lack of access in less populated areas or where or with whom ‘the market’ couldn’t generally make a go of it.

MCSA views the Productivity Commission inquiry as an opportunity for the Australian Government to actively ensure access to affordable and high quality services for all children, through an intentional and pro-active approach to service system planning.

The current Australia-wide service system of the type of care provided by LDC is patchy in coverage of remote and some rural and regional areas.

Those services that provide LDC type care in more isolated communities have been developed during the occasional bouts of rational service system planning, combined with a robust contribution from the local communities that were in the right place, at the right time, to advocate for and receive funds to operate new services.

The six Mobile Child Care Services in NSW developed under these conditions.

The BBFP funding guidelines has a clear focus on the provision of various types of EC service where ‘the market fails’.

The Australian Government should build on this aspect of the BBFP by undertaking, in the various non-metro sub-regions throughout Australia, a standard service system planning task of mapping assets and gaps.

This asset and gap analysis should be seen in the broader context of early childhood development and also map the full service system that includes health and welfare services available to young children in non-metro areas.

To be clear, this analysis should include access to Australian Government, BBFP funded, Mobile Playsession Services.

Pilot this in NSW.

**MCSA Recommendation 5.1:** That DE conduct an Australia-wide asset and gap analysis, at sub-regional level, for the purpose of describing the local early child development system.

**[ii] Calling all stakeholders!**

An intentionally developed ECD service system needs input and championing by stakeholders in the many sectors of society and the economy.

These other stakeholders should be engaged and in some circumstances lead the processes that identify gaps in ECD services.

Chief amongst these are those Government departments, or organisations funded by Government, that have a brief to proactively engage regional communities on economic and social development.

Regional development agencies usually have a strong focus on economic development: Employment, training and access to child care are key issues.

Mobile Child Care Services have facilitated local economic development that would otherwise have been of a lesser magnitude, just by providing care: Build it and they will come.

Those agencies focused on natural disasters should consider the utility of Mobile Children's Services in supporting families through crises, both slow and rapid, as well as assisting community and business recovery.

These agencies should be partners in identifying and addressing assets and gaps in access.

**MCSA Recommendation 5.2:** That statutory bodies and regional development organisations funded by the Australian Government be partners in ensuring that children, their families and communities have access to affordable, high quality, educationally focused Early Childhood Development services.

**[iii] Drilling down: Proactive planning: Mobile Child Care Services in remote, rural and regional communities**

Mobile Child Care Services in NSW, as well as those in Victoria and South Australia, are a tried and true service delivery strategy, providing LDC-like services to rural and regional communities.

They are a service system strategy that the Australian Government should prioritise as it comes to terms with gaps in service delivery in rural and regional areas.

They are funded by operational subsidies that allow the true cost of service delivery to be taken into account.

Most of the Mobile Child Care Services in NSW have informed MCSA that parents want extra days at their current venues as well as extended hours and parents in unserved communities are desperate for access.

**Why should these children, their parents and communities not have access on an equal footing with their fellow metropolitan-living citizens?**

Building on the previous recommendations for an intentional approach to service system planning in regional, rural and remote communities, through a broad asset and gap analysis, as well as funding design and administration reform, MCSA recommends an asset and gap analysis focused on the potential expansion of Mobile Child Care Services, Australia-wide.

This analysis would address those only receiving a minimal service as well as expansion of service delivery to unserved communities.

It follows that funding be available to make access a reality and that DE then implement a 'growth' strategy.

Pilot in NSW.

**MCSA Recommendation 5.3:** That DE conduct a tri-annual asset and gap analysis to identify sub-regions, Australia-wide, where new Mobile Child Care Services are warranted or where existing Mobile Child Care Service can extend their offerings.

**[iv] Drilling down: Proactive planning: Mobile Playsession Services in remote, rural and regional communities.**

The above 'asset and gap analysis' should also be implemented, Australia-wide, to expand the delivery of Mobile Playsession Services as complementary strategies to the mainstream 'care providing' services.

MCSA notes that Mobile Child Care Services, as an LDC-like service delivery strategy, may not be as useful in very remote areas.

However, Mobile Playsession Services, especially those that are Approved Services under NSW's very useful *Children's (Education and Care) Services Supplementary Provisions Regulation 2012*, are the epitome of flexibility and responsiveness and can be turned to providing one-off formal 'care' as circumstances arise or consistently provide a formal 'care' service, perhaps one to two days per week, in a small, remote community.

It follows that funding be available to make access a reality and that DE then implement a 'growth' strategy for these services.

Pilot these in NSW.

**MCSA Recommendation 5.4:** That DE implement a tri-annual asset and gap analysis to identify sub-regions, Australia-wide, where new Mobile Playsession Services or additional or extended Mobile Playsession Services sessions are warranted.

## **6. Intentionality: Reform to funding administration**

Previous sections have addressed higher order issues in 'funding program design' and service system planning.

The following section addresses those day to day funding administration issues that are critical for the day to day operation of services and their viability into the long term.

All sixteen Australian Government funded Mobile Children's Services subject to the Productivity Commission inquiry are funded under the Budget Based Funding Program.

MCSA thoroughly discussed the administration of funding under the BBFP in our submission to the *Review of the Budget Based Funding Program*.

The following add to MCSA's views.

## **[i] Recognising the real cost of service delivery**

Mobile Children's Services provide access to educationally focused, ECD services where children and their parents and communities do not have 'reasonable access'.

Mobile Children's Services are an effective access strategy where it is not possible or economic for services users to travel to a service 'centre', where centre-based services are not yet available or would never be available, where the market fails to provide a service or where there is a need for flexibility, innovative strategies and timely responsiveness in engaging and supporting communities.

The different Mobile Children's Services types, in their own way and with different emphasise, are about access, engagement and support.

Instead of the community travelling to a service 'centre', the service travels to the community, however defined, wherever located.

Any children's service can be put on wheels and travel to a community.

### **Whilst Mobile Children's Services are cost effective, they are not cheap.**

One of the key resourcing tasks for MCSA, for over two decades, has been to ensure that the services operate within their means.

This involves working with the services to ensure that they deliver a high quality, safe and affordable service within their total revenue, including paying attention to a three to four year cycle of capital replacement.

In costing terms, the level of revenue determines the level of service delivery, keeping in mind that the service must meet sector standards, be affordable and be safe for all stakeholders.

Fees for Mobile Playsession Services in NSW are usually low, given that BBFP recognises that the level of funding should cover most costs.

Fees for Mobile Child Care Services in NSW are usually commensurate with fee levels in the closest LDC market.

As a matter of principle, 'care providing' Mobile Children's Services should not compete with centre-based services.

Simply put, the lower the revenue, from all sources, the lower the level of service delivery and therefore the level of access.

This equation makes it imperative that all stakeholders are clear on what a service does, how much service is to be delivered, at what sector standard and in what geographical area or to which population group.

MCSA has developed a standard chart of accounts for budgeting for Mobile Children's Services [As well as other resources useful for developing business cases], focussing on the imperative to ensure that quality, safety and affordability are in balance with revenues and a sustainable level of service delivery.

A key dynamic in all community services is the push by all stakeholders, funders, providers and service users, to deliver as much service delivery as possible.

As such, it is important that all these stakeholders are aware of the limits to service provision provided by the level of Australian Government funding and be aware that services must not compromise on the standards of service delivery and safety.

MCSA notes that a number of BBFP funded Mobile Children's Services have advised that they are having difficulty balancing the level and standard of service delivery.

This is manifested in a service design imperative which leads to some of the 'quality' and 'safety' standards being compromised to maintain the level of service delivery.

This is not sustainable, of course. Something has to give.

It is MCSA's experience that once the level of service delivery is reduced, staff hours are reduced, leading inexorably to dissatisfied stakeholders and difficulty in maintaining a qualified and experienced staff team.

As described in the Productivity Commission's Research Report *Early Childhood Development Workforce* [November 2011], recruiting and retaining qualified and experienced staff is a key barrier to service provision in rural and remote communities.

An assumption in this section's recommendations and those related to service growth, is that service contracts are set for a particular level of service delivery.

Any unmet demand should be met through either increased funding/growth in service provision or replacing one venue with another of equal cost to the service.

MCSA recommends that the funding level of services in the BBFP recognises the real cost of service delivery.

**MCSA Recommendation 6.1:** That funding levels in the Budget Based Funding Program recognises the real cost of service delivery.

#### **[ii] Operational funding**

The funding for Mobile Children's Services under the BBFP should continue to be provided as operational funding.

Turning the funding arrangements over to a 'per child' funding model, the basis of the CCB/CCR system and the centre-based Preschool funding system in NSW, would be ineffective in delivering improved access outcomes.

MCSA addressed this issue in detail in its submission to the review of the BBFP.

MCSA is working with the NSW Government to develop a contract based funding system for Mobile Preschools: The Brennan *Review of NSW Government Funding for Early Care and Education* [April 2012] found that both Mobile Preschools and some rural and remote Preschools should be funded on a contractual basis as the 'per child' funding system is ineffective in maintaining financially viable and sustainable services.

**MCSA Recommendation 6.2:** That funding under the BBFP continue as operational funding.



**[iii] Keeping up with the real cost of service delivery**

One of the key problems in maintaining the balance between the level of service delivery and attendant quality and safety standards is that the level of annual grant indexation for BBFP services has not kept up with cost increases: Staff wages, fuel, professional development, equipment replacement, base and venue rents, licensing costs etc.

The Remote and Isolated Children's Exercise in South Australia estimates only a total of 6.7% recurrent funding increase from the Department of Education [Ex. DEEWR] between 2007/2008 and 2013/2014 [Pers Comm].

Applied across the board to all BBFP services, this represents a recipe for disaster and a downward spiral in the capacity of services to do their job.

As the real value of the grants decrease, a decision has to be made about what to cut.

Make a choice: Level and/or standard/quality of service delivery.

**MCSA Recommendation 6.3:** That the Budget Based Funding Program should absolutely ensure that annual grant indexation is at a level that enables funded services to maintain the level and quality of service delivery.

**[iv] Flexible funding and long term service planning**

Whilst there are current problems with many BBFP funded Mobile Children's Services with respect to the inadequacy of the current level of funding and inadequacy of annual indexation, there is still the problem of unmet demand and lack of flexibility within funding administration mechanisms to plan for the future.

Other recommendations in this submission address the need for a 'growth' mechanism in funding to address unmet need.

Eventually, services should be able to accommodate year to year fluctuations in demand through a real 'budget based' contracting system that allows for annual increases and decreases in the level of service delivery as the circumstances of the communities change.

This would entail the ability, through the funding mechanism, to increase or decrease the level of service delivery and funding from year to year, keeping in mind that most costs in Mobile Children's Service act as 'fixed costs'.

To plan in this way, services need the stability of **longer term contracts** with **built-in flexibility**.

**MCSA Recommendation 6.4:** That Mobile Children's Services in the Budget Based Funding Program be funded on a five year 'contract for service' basis which includes a capacity for a review of funding level to meet changes in demand.

**[v] A principle for more effective service sponsorship**

MCSA's experience is that larger organisations, sponsoring several ECD projects, generally provide for better efficiency and long term effectiveness.

Most BBFP funded Mobile Children's Services in NSW are sponsored by either Councils [5] or larger sponsoring organisations [8].

Whilst the smaller organisations have been mostly successful over many decades, their stability has been underwritten by experienced and capable long term staff.

Being embedded in larger organisations delivers a range of economies of scale around staffing, administration, supervision, quality control, equipment sharing, PD sharing etc.

MCSA recommends that funding principles favour larger, educationally focused, ECD organisations as sponsors of BBFP services.

**MCSA Recommendation 6.5:** That Budget Based Funding Program administration principles favour and fund multi-aspice arrangements under the Budget Based Funding Program.

**[vi] Re-instating access to 2006/2007 levels of service delivery**

Annual grant indexation for BBFP services has not kept up with the real cost of service.

Many Mobile Children's Services, Australia-wide, funded under the BBFP have been treading water for a few years, trying desperately to maintain their level of service delivery as well as keep the quality high.

Other BBFP funded Mobile Services in NSW have been able to increase fee revenue in some way or decrease their outgoing or overheads to account for the loss in real value of their BBFP funding.

Some BBFP funded Mobile Services in NSW have received funding from other sources to increase their level of service delivery [Joint funded with the NSW Government] and contribute to overheads, as the real value of BBFP funding drops.

Fee revenue being static and DE funds falling dramatically in real terms, some BBFP Mobile Services are now in the situation where they will have to cut the level of service delivery to maintain quality and safety.

This occurs in an environment when demand for services is increasing.

Dropping the level of service delivery is nearly always a prelude to instability in staffing.

MCSA recommends that DE undertake an exercise to restore the level of funding of BBFP services to ensure that the quality and service delivery levels of 2006/2007 are reinstated or maintained.

**Why should children in rural and remote communities suffer a loss of access when their city cousins were able to access the ever increasing, uncapped number of metro-located services over the past seven years?**

See previous recommendation for cashing out CCB/CCR funds to accommodate growth to provide better access.

**MCSA Recommendation 6.6:** That the Australian Government ensure that the funding level of BBFP services throughout Australia is enough to reinstate or maintain the level of service delivery of 2006/2007, with up to date affordability, quality and safety standards.

## 7. Other educationally focused, early childhood development services

MCSA is aware that both South Australia and Queensland provide some very different types of services to very remote communities and individual properties.

MCSA commends the work of South Australia's *Remote and Isolated Children's Exercise* [RICE] and Queensland's Frontier Services' *Remote Area Family Service* [RAFS] on-property work.

MCSA endorses RICE's submission to this Productivity Commission inquiry.

MCSA considers these services as 'mobile'.

**MCSA Recommendation 7.1:** That the Australian Government examine the utility of the *Remote and Isolated Children's Exercise* and *Remote Area Family Services* projects in addressing access in very remote communities and properties with the intention of extending the models to other jurisdictions.

MCSA has not canvassed Mobile Services on other arrangements regarding on-property child care entered into privately, such as governess arrangements.

**MCSA notes that children and their families in rural and remote areas should benefit from the funds available for childcare equitably with children in metro areas.**

In the case where public funding is considered for privately arranged, on-property childcare, MCSA notes that any form of public funding, including the loss of tax revenue through tax deductibility, should be tied to standards being met and tied to a quality assurance system as per requirements on other forms of publicly funded childcare.

## 8. Supporting children with additional needs

### [i] Additional needs: Mapping the system and building on current infrastructure

Access to educationally focused, ECD services is a critical factor in early intervention for children with additional needs.

Mobile Children's Services of all types are often the only service that visits a community or supports a parent/carer on a property.

Some Mobile Children's Service work closely with health professionals, including joint visits to communities and properties.

In many communities, there is a small infants and primary school, but we know that the earlier the intervention, the better the outcome for young children with additional needs.

Access to qualified early childhood professionals in isolated settings works for the benefit of young children by identifying developmental issues early as well as by supporting health professionals to implement individual support programs.

Again, an intentional system that provides outreach to assist children and parents and supports early intervention professionals, consistent with the NECDS, is required.

See above for asset and gap mapping and service system planning exercises: These exercises include mapping the child-focused health system in rural and remote regions.

One initiative to investigate is rural and remote ECE services having the capacity to purchase health services for young children.

**MCSA Recommendation 8.1:** That the Australian Government builds on the current early care and education infrastructure in rural and remote communities to support all aspects of early intervention.

**[ii] Additional needs: What real support for early intervention looks like**

Mobile Children's Services are often the first port of call when families start using formal education and care services, be they Mobile Child Care, Mobile Preschool, Mobile Play Session or Mobile Occasional Care Services.

Often, it is at these entry points of the formal early education and care system that children and parent/carers first meet a practitioner who suspects that a child has additional needs or is asked by a parent/carer "what do you think?"

The full early childhood practitioner set of knowledge and skills can be brought to bear in the various phases of collecting evidence to supporting a child through testing, diagnosis and implementation of an individual early intervention program.

These services are also well situated to support children with additional needs **and their families**.

These services are well situated to support children with additional needs in their transition to formal schooling.

MCSA notes the relative lack of access to health professionals in non-Metro and Indigenous communities.

MCSA notes that some services are experiencing an increase in the number of children with additional needs attending their service.

Albeit a priority for services, supporting children with additional needs, through diagnosis to program implementation, is time and energy consuming as well as costly.

MCSA notes that the funding programs set up to facilitate the work of services with children with additional needs do not take into account this extra time, energy and cost through each phase of support.

In the case of Mobile Children's Services, these funding programs do not take into account their operational circumstances.

In particular, dedicated staff time needs to be made available for:

- One-on-one child support
- Networking and collaboration with funders, health and welfare professionals and
- Supporting parents through what can seem like the health system maze

**MCSA Recommendation 8.2:** That funding programs supporting children with additional needs provide funding for dedicated staff hours to support children through all the different phases and aspects of their work with children and their families.

**[iii] Early Intervention: Reforming funding program guidelines**

MCSA particularly notes that funding programs supporting children with additional needs, such as the Inclusion Support Program [ISP], need to have program guidelines adapted to the circumstances of children in isolated circumstances as well as adapted to the situation of services that support the children.

**MCSA Recommendation 8.3:** That the guidelines for the Inclusion Support Program and other additional needs support programs be reviewed to account for the circumstances of children in isolated circumstances and the operational circumstances of ECE services that support them.

## **9. Supporting Indigenous children**

MCSA supports the work of the Secretariat of National Aboriginal and Islander Child Care [SNAICC].

All Mobile Children's Services have a contracted funding priority to support Indigenous children and their families.

MCSA addressed aspects of the funding of Indigenous identified services in the BBFP in our submission to the Review of the BBFP, particularly arguing against the prospect of the funding mechanism changing to a mainstream CCB/CCR arrangement.

MCSA has a long standing view that ECD services for Indigenous children, their parents and communities, should be substantially free.

Whilst supporting the employment choices of parents is a key NECDS outcome, educationally focused, ECD services also meet many other NECDS outcomes through an ecological approach to child development [Bronfenbrenner].

Affordability is a critical access issue.

**MCSA Recommendation 9.1:** That educationally focused, early childhood development services be substantially free for Indigenous children.

## 10. Service Quality and Regulation

### [i] Transition to the National Quality Framework: Transition soonish!

Attachment 2, *MCSA Statement on the National Quality Framework*, fully describes MCSA's views on the National Quality Framework [NQF] including where Mobile Children's Services currently 'fit' and where MCSA would like the services to 'fit' as the NQF evolves.

MCSA supports the NQF as it articulates from the NECDS's vision and outcomes, focuses on high quality in the education and care of children and promotes a holistic approach to supporting the development of children in other domains such as health and welfare.

The NQF focus on the importance of nurturing relationships and the quality of development support is critical if we want the best chance of providing wonderful childhoods and creating decent communities.

The NQF, its standards, learning framework and external assessment, puts in place what we know about good quality services and systems.

Mobile Children's Services are currently out-of-scope under the NQF.

Noting that the NQF is to be reviewed in 2014, MCSA believes that regulated Mobile Children's Services should be included.

Attachment 2 provides a detailed argument for this case in NSW.

**MCSA Recommendation 10.1:** That regulated Mobile Children's Services become in-scope under the NQF.

Given that some jurisdictions are less advanced in their regulation of Mobile Children's Services as 'state regulated early childhood education and care services', MCSA recommends that each jurisdiction has the capacity to transition their non-NQF services into the NQF when deemed ready.

Pilot this in NSW.

**MCSA Recommendation 10.2:** That the 2014 review of the National Quality Framework provide the capacity for each jurisdiction to transition their non-NQF services into the NQF when deemed ready.

### [ii] Transition to the National Quality Framework: Accounting for the cost of quality

The NQF provides for steadily increasing standards.

Mobile Children's Services in NSW that provide 'care' [Including most BBFP funded Services] already have standards equal to or higher than the current and medium term NQF standards, being covered by NSW's *Children's (Education and Care Services) Supplementary Provisions Regulation 2012*.

The 'supplementary provisions' legislation in NSW is an update from the previous legislation that covered both Mobiles and centre-based ECE and generally had/has higher standards than those in the first phase of the National Regulation: Staff:child ratios; Staff Qualifications; Standards for Nominated Supervisors; Two staff on at all times etc.

The costs for these higher standards under the current NSW legislation are borne through current funding arrangements.

MCSA notes that many BBFP services are currently in financial difficulty – See Section 6 for recommendations on the realistic costing of the BBFP Mobiles.

MCSA notes that a new funding model is being developed for NSW DEC funded Mobile Preschools, where **MCSA is arguing for a functional relationship between costs and the level of NSW Government funding**: Accessible; High Quality; Affordable; Safe.

MCSA has developed business case resources matching costs to the level, quality, affordability and safety of service delivery, including costing standards.

MCSA understands that the review of the NQF and subsequent legislation will require a regulatory impact statement and cost/benefit analysis.

Any extra costs for the progressively higher standards need to be met.

Higher costs may require capital to improve venues, especially for hygiene related practices in non-purpose built facilities.

MCSA believes that any extra costs for those Mobile Children's Services transitioning to the NQF be borne by the Australian Government.

**MCSA Recommendation 10.3:** That extra renewable funds be provided to regulated Mobile Children's Services to cover any extra costs in service delivery, including capital costs, due to services transitioning to the NQF.

See later on the support required to assist services to transition to the NQF.

### **[iii] Quality standards for non-regulated BBFP funded Mobile Services**

A small number of BBFP funded Mobile Children's Services in NSW are not regulated as they don't provide licensable 'care'.

Two important elements of the NQF are the *Early Years Learning Framework* and the clearly articulated standards in the *National Quality Standard*.

As well, NQF services are required to undertake an external quality assurance process.

The non-regulated BBFP services should be subject to standards and some form of a quality assurance process.

A mandated 'Code of Practice', adapting the National Quality Standard and EYLF to circumstance, would fit the bill here.

This code of practice could also form the basis of a quality assurance process which should have some form of external assessment.

There are many NSW Government funded Mobile Playsession Services that would benefit from this 'code of practice'.

**MCSA Recommendation 10.4:** That non-regulated, Budget Based Funding Program Mobile Services be subject to a *Code of Practice for Mobile Playsession Services* adapted from the *Early Years Learning Framework* and the *National Quality Standard*.

Pilot this in NSW.

#### **[iv] High quality practices: Networking and collaboration**

Of huge importance to Mobile Children's Services, working with children in isolated circumstances, is bringing on board other professionals to support children and their parents, especially where additional needs are concerned.

Real networking and collaboration with health professionals and others requires dedicated time and resources, including staff replacement and the ability to purchase services.

Articulating from the vision and outcomes of the NECDS, the guidelines for BBFP services should value networking and collaboration and explicitly fund dedicated time.

As recommended previously, the Australian Government should support the ECD service system through an annual asset and gap analysis.

This analysis is a first step to ensuring that children and their families in isolated circumstances have reasonable access to health and welfare services.

**MCSA Recommendation 10.5:** That the Budget Based Funding Program guidelines value and fund dedicated collaboration and networking in the Early Childhood Development service system and support this through a state-wide, sub-regionally focused asset and gap analysis.

### **11. The early education and care workforce**

The quality and personal attributes of ECEC staff are the major determinants of the quality of an ECEC service. These determine the quality of interactions between educators and children.

The 'quality' of staff includes their qualifications and training.

MCSA supports the qualification requirements of the National Quality Framework.

The Productivity Commission's Research Report: *Early Childhood Development Workforce* [November 2011] provides a good description of issues facing the early childhood education and care [ECEC] workforce.

In particular, the Research Report provides a good description of issues facing the ECEC workforce in rural and remote areas.

Critical to recruiting and retaining a high quality ECEC workforce are:

- Access to professional development and mentoring
- Attractive career pathways
- Relatively attractive pay and conditions, including subsidised housing in rural and remote areas
- Increasing the status of ECEC 'work'

In particular, MCSA supports the Research Report's Recommendations 9.1 and 9.2 on rural and remote workforce issues and Recommendation 10.7 on professional development.



In practical terms, these recommendations mean that funding needs to be available to offer attractive pay and conditions in rural and remote areas as well as enable access to professional development tailored to rural and remote circumstances.

These funds can be built into service funding as well as the funding provided to professional development agencies.

See below for the type of resourcing that should be available to support professional development in Mobile Children's Services.

MCSA commends the Australian Government's *Early Years Workforce Strategy* and current initiatives that support professional development designed to smooth the transition to the NQF.

**MCSA Recommendation 11.1:** That Recommendations 9.1, 9.2 and 10.7 of the Productivity Commission's Research Report *Early Childhood Development Workforce* be implemented in support of the rural and remote ECEC workforce.

## **12. Supporting service development & high quality in Mobile Services**

### **[i] Supporting service development and high quality in Mobile Children's Services**

Mobile Children's Services play an important role in support of children and their parents and communities in isolated circumstances.

There are still children without access to early childhood services.

NAMS and MCSA look forward to working with the Australian Government to support current services to grow and to establish new Mobile Children's Services, Australia-wide.

In Attachment 2, MCSA has described a pathway for the regulated Mobile Children's Services in NSW to transition to the NQF.

MCSA has been resourcing services on parts of the NQF that can be implemented right now: *Early Years Learning Framework*, *National Quality Standard* and practice *Quality Improvement Plans* [QIP].

This does not include preparation for compliance with the National Law as there are some major differences between the laws and the National Law will probably be up for review after 2014.

**The idea is to get services up to speed on what they can do whilst outside the NQF, well ahead of any commencement date, and make the transition to NQF easier.**

Most Mobile Services in NSW have embraced this and are putting in a big effort to introduce the EYLF and the NQS into their policies and practices.

Recent initiatives by the Australian Government have supported the transition to the NQF: Professional Support Co-ordinators are assisting non-NQF services to become familiar with the QIP and staff are able to access some workforce initiatives such as subsidised RPL assessment.

MCSA has worked with the NSW Government on regulation matters and has supported the services in their early childhood practices related to ‘regulation’ and prospective ‘transition’.

As well as any costs for higher standards, the transition to the NQF or implementation of a *Code of Practice* will require significant professional development.

Transitioning the regulated Mobile Children’s Services into the NQF will require a lot of support on ‘mobile’ specific practices and require detailed public policy development that will start with the big idea of transition and lead to the on-the-ground implementation of a revised National Law and assessment and ratings system.

**Up to now**, the NSW Department of Education and Communities funds MCSA under the Mobiles Resourcing Project to comprehensively support the one hundred and ten Mobile Children’s Services in NSW.

This is set to change with new contract specifications from July 2014.

Nevertheless, the Mobiles Resourcing Project works well for NSW Mobiles and offers an example of the resourcing strategies that could be employed Australia-wide.

MCSA recommends that a dedicated, Australia-wide, representation and resourcing project be established.

**MCSA Recommendation 12.1:** That a dedicated, Australia-wide, Mobile Children’s Service representation and resourcing project be funded to facilitate service development and the transition of Mobile Children’s Services into the NQF as well as support non-regulated services to implement a *Code of Practice* for their service type.

### 13. Conclusion

There are children throughout Australia that still lack reasonable access to childcare and early learning.

This submission argues that reform of various aspects of program design, program administration and planning systems form the basis of a system that intentionally identifies gaps in service delivery and proceeds to address unmet demand.

Mobile Children’s Services are a good example of the ‘fit for purpose’ ECE services that are a service response well placed to address lack of access.

This submission also argues that licensed Mobile Children’s Services should be brought into the National Quality Framework

High quality early childhood development services play an important role in improving the outcomes for children, particularly those in isolated circumstances.

Tim Keegan  
Executive Officer

**February 2014**

Z:\MCSA Files\MCSA Resourcing\Practice issues for Mobiles & sub-types\Management Practices\Funding\Funding Issues - Mobiles\Productivity Commission C&ECL Inquiry 2014\MCSA - Submission PC C&ECL Inquiry 1 2014.doc

## Attachment 1 – The Big Ideas

### Mobile Children's Services – What's the Big Idea?

#### 1. Introduction

There are one hundred and ten Mobile Children's Service 'projects' in NSW supporting:

- Thousands of children and their families
- In hundreds of communities – Remote, rural, remote, urban fringe and inner metro
- In a range of ways - See later for a description of the different service types

Mobile Children's Service's break down the barriers of isolation by providing services which are responsive to the particular circumstances and needs of young children and their families in those communities: Isolation may be geographic, social, cultural or economic as well as a combination of these.

MCSA has long given up on developing a one-size-fits-all 'definition' of Mobile Children's Services. We have settled for describing them, by answering the following:

- What do the services do?
- Why do they do what they do?
- What are the big ideas underlying Mobile Children's Services?
- Where do they fit into the 'service system' that supports children and their families?

In general, Mobile Children's Services are a way of providing educationally focused, early childhood development activities to children, their parents and communities who would otherwise have no access or limited access.

'Mobile' is a model of service delivery: In the case of Mobile Children's Services in NSW, 'mobility' is mostly about a service system response to a lack of access: 'Mobility' is about fair and reasonable access.

A significant number of children in NSW would not have the opportunity to participate in educationally focused, early childhood development activities without the access provided by Mobile Children's Services.

As well, 'mobility' is often an alternative service system approach to engaging and supporting 'communities of interest' on important issues. This is generally referred to as 'outreach'.

Mobile Children's Services are an effective strategy where it is not possible or economic for services users to travel to a service 'centre', where centre based services are not yet available or would never be available or where there is a need for flexibility and responsiveness in community engagement and support.

The different Mobile Children's Services types, in their own way and with a different emphasise, are about access, engagement and support.

Instead of the community coming to a service 'centre', the service goes to the community, however defined, wherever they are.

Any children's service can be put on wheels and travel to a community.

As well as a brief description of what Mobile Children's Services do and a rationale, this document describes some 'big ideas' that underlie their work and describes their place in the service system that supports young children and their families and communities in NSW.

## **2. About Mobile Children's Services: Their rationale and what they do**

Mobile Children's Services are 'fit for purpose', educationally focused, early childhood development services, working in isolated communities, however isolation is defined.

Services aim to support the development of a child's full potential, giving them a good start.

Research on brain development in children and the deleterious effects of under-stimulation, neglect or abuse, underline the crucial role that structured early childhood activities provided by competent services and educators play in the development of children.

In an ecological sense, children live in families in a social and economic context. Ensuring a decent neighbourhood contributes to a good childhood.

Children, their parents and communities have a range of needs when it comes to early childhood development.

Mobile Children's Services respond to these needs by delivering a range of activities/strategies to their communities. This is why they are 'fit for purpose': Responsive to the circumstances and needs of their stakeholders and flexible in their service delivery.

This responsiveness and flexibility has lead to the development of several types of Mobile Children's Service, mostly mirroring their centre-based/come-to-us, counterparts:

- Mobile Preschool Services
- Mobile Child Care Services [LDC-ish]
- Mobile Occasional Care Services
- Mobile Playsession Services
- Mobile Toy Library Services
- Mobile Adjunct Care Services [Community Access Mobile Minder Services] and
- Often, combinations of different service strategies in the one Mobile Children's Service, particularly in more geographically isolated areas
- Often, one of the Mobile Service types, but focused on specific population groups such as children with additional needs or children and their families in difficult circumstances.

[See MCSA's publication *An Introduction to Mobile Children's Services* for further details].

Most Mobile Children's Services in NSW are involved in the direct education and care of children. They are regulated by the NSW Government.

The majority of Mobile Services in NSW are funded by the NSW Department of Education and Communities [DEC] under the Early Childhood Education and Care Grants Program.

Most DEC funded services provide formal 'care' and are regulated children's services.

For example, there are fifty Mobile Preschools in NSW, working in numerous communities.

The Commonwealth Department of Education, Employment and Workplace Relations [DEEWR] funds sixteen Mobile Services through the Budget Based Funding Program

[BBF]. There are six Mobile Child Care Services – These provide care and are all regulated.

As well, most of the DEEWR funded Mobile Playsession Services, where parents technically ‘care’ for children, are regulated on the basis that they occasionally provide formal care at community events.

Sixty Mobile Services are ‘state regulated early education and care services’ under the *Children’s [Education & Care Services] Supplementary Provisions Regulation 2012*.

### **3. Other big ideas about Mobile Children’s Services**

The introduction, rationale and description of Mobile Service types in the previous sections outlines key ‘big idea’: Mobiles are about fair and reasonable access to a good quality early development experience for children, their families and communities in isolated circumstances.

Following are some other principles and characteristics that underlie the work of the services.

These vary from service type to service type and community to community.

#### Advance and withdraw

Mobile Services are generally seen as ‘advance and withdraw’ community services where they provide activities at a time and place that no other educationally focused, early childhood development services are reasonably available to a child and their family through the standard centre-based/‘come-to-us’ service system.

As ‘advance and withdraw’ community services, Mobiles have to be flexible to meet local needs and be responsive to waxing and waning demand as well as emerging needs.

As communities develop, the service system also generally develops to provide reasonably accessible services and Mobile Services may no longer be needed.

In the main, because the market fails to deliver to some communities, the regulated Mobile Children’s Services are subsidised at relatively high rates by Governments.

As the factors that make ECEC services viable improve over time and as the centre-based service system expands, the principle arises that relatively highly subsidised services should not compete with good quality, equivalent types of ECEC services. They should move on.

However, some communities will never have a critical mass of children to justify a centre-based/come-to-us or market based solution to access. The venue of such Mobile Children’s Services, located to draw from a wide hinterland, becomes more or less permanent.

The advance and withdrawal principle is particularly apt for the regulated Mobile Children’s Services who provide an early childhood education and care service: Service systems develop and centre-based ECEC service types gradually fill the space so that Mobile Children’s Services are no longer needed. They should move on.

As well, it is often the case that Mobile Children’s Services work in locations where there is an accessible centre-based alternative but this alternative does not address the particular

needs of some population groups whether that be about the quality of care or cultural competence.

Other non-regulated Mobile Children's Service types are just a good way to get particular services to a community rather than have the community come to a centre.

It is about 'access', however, the non-competition principle doesn't apply as the activities provided are generally not commercially available, such as Mobile Toy Libraries.

#### Cost effectiveness and cost of service delivery

There will never be a centre-based ECEC service on every street corner.

Mobile Children's Services are provided where there is no reasonable access.

Mobile Children's Services are a very practical and cost effective means of providing access and an equitable amount of society's resources to those in isolated circumstances. Whilst being cost-effective, Mobile Children's Services are not cheap: Access, safety, quality and good management have a cost.

#### Ecological framework

Mobile Children's Services work within an ecological framework, supporting the development of children within the context of their family and community situations [See Bronfenbrenner, Uri [1979] *The Ecology of Human Development*]

#### Community engagement

The day to day operation of all services involves the participation of parents. This is particularly so in the Mobile Playsession Services where parents stay at the session and participate in the program. This is a welcome socialising opportunity for parents and also creates the opportunity to learn about and discuss community, child development and parenting issues. The services are important generators/facilitators of social capital in isolated communities. This is a 'village pump'.

#### Resilient communities and community based management

Most Mobile Children's Services in NSW are 'community managed' and were set up through a community development process. Again, community managed services are an important generator of social capital and provide a sound base for the development and maintenance of strong and resilient communities: Decent neighbourhoods for children to grow up in.

### **4. Mobile Children's Services & the early childhood service system**

This section places Mobile Children Services and the different service types more formally within the context of the wider Early Childhood Development [ECD] sector and the systems of support which enables children to achieve their potential.

#### The National Early Childhood Development Strategy and service systems

It is useful to describe the place of Mobile Services in the ECD sector by using the *National Early Childhood Development Strategy: Investing in the Early Years* as a framework.

The *National Early Childhood Development Strategy: Investing in the Early Years* [NECDS] is a well thought out, 'big picture' strategy bringing together the diverse elements

of the Australian way of doing things to the effect that, with everyone working together, children have the best start in life.

Commonwealth and State Governments have signed on to this strategy through the Council of Australian Governments [COAG] process and subsequent National Partnership Agreements.

The NECDS outlines ways that the early childhood 'service system' can contribute to the 'best start in life' vision.

This includes ensuring the provision of good quality early childhood education and care services, supporting parents in the many aspects of their parenting role [Including as educators, of course], articulating and supporting the different levels of service system intervention and valuing inter/intra-sector collaboration: A structured and holistic approach to many things that impact on the development of children in their very different circumstances.

#### The educationally focused early childhood development sector

Good quality educationally focused, early childhood development services are crucial to the achievement of the 'best start' vision.

The term 'educationally focused' is used here to distinguish these services from health and welfare services that are also child-focused.

These services mostly operate as 'universally' available services. Some services are 'targeted' for particular communities and a minority are provided as 'intensive' focus services.

All Mobile Children's Services are educationally focused, ECD services.

#### The regulated, educationally focused, early childhood development sector

For regulated services, the *National Quality Framework* [NQF] articulates from the *National Early Childhood Development Strategy*, focussing on quality in the education and care of children and includes a structured and holistic approach to supporting the development of children in other domains such as health and welfare.

These are generally called early education and care services [ECEC]

There are sixty regulated Mobile Children's Services providing access to a structured early development experience.

These are a sub-sector of the regulated, ECEC services sector and are made available in the circumstance where children and their families do not have reasonable access because of the various forms of isolation, particularly where the free market doesn't work now or never will.

From a service system funding perspective, these services should not compete with good quality and similar types of centre-based services.

Whilst the regulated Mobile Children's Services are currently out-of-scope under the NQF, there are elements of the NQF that are being implemented now in the services as frameworks and guides to good practice.

Mobile Preschools, Mobile Child Care Services and Mobile Occasional Care Services are regulated ECEC services. Some Mobile Playsession Services are regulated for the occasional times they do provide formal care.

#### The non-regulated, educationally focused early childhood development sector

Again, all Mobile Children's Services are educationally focused, ECD services.

However, many are not regulated early education and care services: The parents are present at sessions and have formal care of their children. They work in different ways towards the same vision.

The non-regulated Mobile Children's Services still generally provide a structured early childhood development activity, however, the context and focus of service provision is different and other child development issues and support strategies are brought to bear.

Some services support early childhood development through structured play sessions for children and supporting parents on the multiple aspects of their parenting as well as connecting child to child and parent to parent to foster and facilitate 'community': Mobile Playsession Services are the modern day village pump.

Mobile Toy Libraries may provide structured play sessions, however, their underlying foci is on the development of children through the provision of quality early childhood equipment and resources as well as supporting parents in their role as educators.

Community Access Mobile Minder Services provide structured play sessions to groups of children while their parents are in an adjacent room attending to other life matters in sessions run by various agencies such as Anglicare. In technical terms, as they are "in the Immediate vicinity", the parents still have care: CAMMS 'supervise' the children, bringing to bear all the practices involved in any 'care' type of session.

In all the non-regulated types, there is also a strong element of supporting parents in their various roles, through listening, information, discussion, advice and referral to other agencies. The parents are at the 'session' and it is an ideal opportunity to have informal conversations.

In the service system, they are the less formal, 'non-stigmatising entry points': Trusted and embedded in their communities.

They are services mostly targeted at 'Universal access' rather than 'targeted' or 'intensive support'. This, of course, usually varies with the funding source and the 'priority of access' in the various funding programs.

The many non-regulated services can also act as an alternative service system approach to engaging and supporting 'communities of interest' on important issues.

They provide a different strategy to regulated ECEC services to achieve the same result, perhaps about immunisation, exercise, nutrition, child development knowledge, managing child behaviour, child protection or school readiness.

For example, the issue may be about the value of regulated ECEC services and the non-regulated services are important information disseminators, referral agents and perhaps stepping stones to the regulated ECEC services.



## **5. Conclusion**

Mobile Children's Services address the educationally focused needs of young children, their families and communities in the rich tapestry of NSW society.

They provide flexible, responsive and innovative strategies where access by travelling to a centre-based service is not reasonable or where an outreach model is the best and/or a complementary strategy to meet a particular need.

This document describes what the services do, their rationale, underlying principles and where they fit in the big picture of 'service systems' seeking to provide children with the best start.

Tim Keegan  
Executive Officer

**June 2013**

## Attachment 2 – Mobiles and the National Quality Framework

### MCSA Statement on the *National Quality Framework*

#### 1. Introduction

The Mobile Children's Services Association of NSW Inc. [MCSA] is the peak advocacy and resourcing agency for Mobile Children's Services in NSW.

Mobile Children's Services provide an educationally focused, early childhood development experience for thousands of children in isolated circumstances in hundreds of communities throughout NSW: Urban, regional, rural and remote.

Isolation may be geographic, social, cultural or economic as well as a combination of these.

Mobile Children's Services work within an ecological framework, supporting the development of children within the context of their family and community situation.

Any children's service can be put on wheels and travel to a community.

This statement outlines MCSA's views on the *National Quality Framework* [NQF], including where Mobile Children's Services 'fit' now and where MCSA wants the services to fit as the NQF evolves.

MCSA supports the *National Early Childhood Development Strategy: Investing in the Early Years* [NECDS] as it is a well thought out, 'big picture' strategy bringing together the diverse elements of the Australian way of doing things to the effect that, with everyone working together, children have the best start in life.

Good quality early childhood education and care services are crucial to the achievement of this vision.

MCSA supports the *National Quality Framework*.

The *National Quality Framework* articulates from the *National Early Childhood Development Strategy*, focussing on quality in the education and care of children and includes a holistic approach to supporting the development of children in other domains such as health and welfare.

The National Quality Framework focus on the importance of nurturing relationships and the quality of development support is critical if we want the best chance of providing wonderful childhoods and creating decent communities.

The National Quality Framework, its standards, learning framework and external assessment, puts in place what we know about good quality services and systems.

Mobile Children's Services are currently out-of-scope under the NQF.

MCSA believes that the services should be included.

MCSA recognises that a transition process has to be implemented to account for the differences between jurisdictions and between the regulated children's service types.

Nevertheless, we would like to see NSW's Mobile Services transition to the NQF sooner rather than later.

There are aspects of the NQF that stand alone as quality practices, guides and standards. These can be and are being implemented right now in Mobile Children's Services, irrespective of them being out-of-scope: The *Early Years Learning Framework* [EYLF] and the *National Quality Standard* [NQS], the NQS's guide to good practice and the self-assessment process of the Quality Improvement Plan.

This statement argues the position for becoming in-scope and outlines the transition strategy MCSA is undertaking with the regulated Mobile Services.

A smooth transition to the NQF will benefit everyone.

## **2. About Mobile Children's Services in NSW**

There are one hundred and ten Mobile Children's Service projects working throughout NSW.

Mobile Children's Services are 'fit for purpose', educationally focused, early childhood development services, working in isolated communities.

Children, their parents and communities have a range of needs when it comes to early childhood development.

Mobile Children's Services respond to these needs by delivering a range of strategies to their communities. This is why they are 'fit for purpose': Responsive to the circumstances and needs of their stakeholders and flexible in their service delivery.

This responsiveness and flexibility has led to the development of several types of Mobile Children's Service, mirroring their centre-based, 'come to us', counterparts: Mobile Preschool, Mobile Child Care [LDC-ish], Mobile Occasional Care, Mobile Playsession, Mobile Toy Library, Mobile Adjunct Care and, often, combinations of different service strategies in the one Mobile Service, particularly in more geographically isolated areas.

The majority of Mobile Services in NSW are funded by the NSW Department of Education and Communities [DEC] under the Early Childhood Education and Care Grants Program.

Most DEC funded services provide formal 'care' and are regulated children's services.

There are fifty Mobile Preschools in NSW, usually working in three or four communities.

The Federal Department of Education, Employment and Workplace Relations [DEEWR] funds sixteen Mobile Services through the Budget Based Funding Program [BBF]. There are six Mobile Child Care Services – These provide care and are all regulated.

Even most of the DEEWR funded Mobile Playsession Services, where parents technically 'care' for children, are regulated on the basis that they occasionally provide formal care at community events.

Sixty Mobile Services are regulated as 'state regulated early education and care services' under the *Children's [Education and Care Services] Supplementary Provisions Regulation 2012*.

These sixty state regulated early education and care services should transition to being in-scope under the NQF, sooner than later.

### 3. Arguments for inclusion in the National Quality Framework

The circumstances of the sixty regulated Mobile Children's Services in NSW set the scene for an early inclusion in the National Quality Framework:

- There are sixty regulated Mobile Services in NSW with a long experience of being regulated
- There is a long history of a good partnership with the regulatory authorities in NSW that has enabled the delivery of safe services in non-purpose built facilities. All other regulatory standards have been the same as any centre-based service
- MCSA agrees with the industry 'harmonisation' process being undertaken by all Australian Governments through the COAG process and believes that early education and care should be included: The NECDS and NQF have put this in action
- MCSA believes that all regulated children's services should be subject to the same national system, legislation and quality assurance process
- Whilst some standards in the National legislation are currently less than those in the NSW legislation, over time, the National legislation will catch-up and is set to exceed the current requirements of NSW's non-NQF services on some matters
- There is a risk that non-NQF services will become or be perceived as lesser quality children's services if standards aren't gradually improved and services are not subject to the external quality assurance process of the assessment and ratings system.
- The NSW regulation for Mobile Services is the same as non-NQF centre-based services and allows a risk management approach to deal with the key issue for Mobile Services: Compliance with Facilities and equipment requirements. The state Regulation's *Venue Management Plans* deal with risks. This has been a crucial and well managed enabling factor for Mobile Services.
- Mobile Services have the support of MCSA which has a focus on ensuring regulation enables the operations of Mobile Services
- Mobile Services have the support of MCSA which supports individual services on regulation issues
- Major aspects of the state based legislation are already significantly aligned with the requirements of the National legislation: Provider and Service Approvals as well as most aspects of supervisor certificates.
- There are some differences in 'operational requirements' and 'policies required' between the state and National legislation but nothing that a well timed and resourced transition period can't deal with
- A significant number of regulated Mobile Services have already started the transition to being in-scope via a staged introduction into their practices of NQF elements and NQS standards: Services are implementing the *Early Years Learning Framework* and are set to ensure the quality indicators described in the NQS are in place in their service. In good time, services will be developing a *Quality Improvement Plan* as a trial. This will help them be 'assessment and ratings' ready.
- MCSA has been a long-term member of DEC's NQF Reference and Partnership Groups, overseeing the roll-out of the NQF and gaining good knowledge of what has worked for in-scope services during their implementation period.
- Mobile Services will do particularly well in some Quality Areas: The success of a Mobile Service depends on its getting out and about and into communities. Good quality Mobile Services can only operate if they have a good relationship with the wider community. They must engage outside their front gate to survive.
- The National legislation allows a risk management approach to 'physical environment' matters, through service and temporary waivers, a 'close enough' mechanism to mirror the NSW risk management approach.
- Similar to the wording of the NSW legislation, the 'physical environment' aspects of the National legislation are written in 'outcomes' language meaning that there is little prescription and Mobile Services can assess their practices as compliant and not

needing a 'waiver' if they are comfortable with the multiple risk control measures they usually have in place.

#### **4. Transition pathway to the National Quality Framework**

There will be a review of the National Quality Framework in 2014 with results being implemented from perhaps 2016 with a transition period on various matters.

MCSA will contribute to the review and argue for inclusion in the NQF for regulated Mobile Children's Services in NSW.

MCSA has long kept services informed about the NQF and encouraged preparation for a transition.

MCSA's transition and resourcing strategy has evolved as the elements of the NQF have been clarified, from the endorsement of the EYLF in mid-2009 to the completion of the *National Quality Standard*, implementation of the National legislation and roll-out of the assessment and ratings system.

MCSA has tracked but not resourced on the details of the National legislation or the administrative processes under the legislation. This would have been too confusing as NSW was undergoing several reviews of the legislation underpinning the non-NQF services.

As well, although the Mobiles Services' state based regulation has many areas of alignment with the National legislation, there are far too many differences on important operational matters to encourage services to do detailed analysis, change their operations and redraft their policies and procedures. There may also be changes to the National legislation as a result of the 2014 review of the NQF.

A transition to the NQF allows for a phased approach beginning with what the services are familiar with and could implement even when out-of-scope and then working towards implementing the more unfamiliar aspects such as the assessment and ratings system and, eventually, the administration and on-line systems.

In the meantime, MCSA will continue to encourage the regulated Mobile Services to make the transition to the NQF smoother by preparing, in a structured way, over the next few years.

MCSA promotes the following NQF transition strategy:

1. From 2009 and on-going: Regulated Mobile Services to implement the *Early Years Learning Framework* in their service: This should be done irrespective of being out-of-scope right now.
2. From 2012 and on-going: Regulated Mobile Services to implement the 'big ideas' in the *National Quality Standard – The Guide to the National Quality Standard*. It is an excellent resource with indicators about what is 'good quality' in each Quality Area. These should be adapted to how a Mobile Service operates, including re-developing policies and procedures around the indicators: This should be done irrespective of being out-of-scope right now.
3. From 2013 and on-going: Regulated Mobile Services to trial self-assessment through the *Quality Improvement Plan* process of the assessment and rating system. This should be done at least twice before becoming in-scope and irrespective of being out-of-scope right now. MCSA will be working with DEC and ACECQA to adapt the assessment and rating system to the circumstances of regulated Mobile Services.

4. From 2013 and on-going: It's never too late to start. The results of the NQF review in 2014 may be a long way off. As well, implementing the EYLF and NQS and trialling the QIP/Quality assurance process are good EC frameworks to apply anyway, irrespective of whether Mobile Services will become in-scope.
5. Before transition to NQF: Regulated Mobile Services should avoid/limit implementing the National legislation.
6. From the transition period before NQF applies to Mobile Services and on-going: When a date for being in-scope is known, regulated Mobile Services should focus on ensuring they comply with the National legislation and understand the administrative and on-line systems.

MCSA also encourages non-regulated Mobile Services, such as Mobile Playsession Services, to use the EYLF and NQS, adapting them to their service type.

As well as advocating for sound NQF policy settings that enable the work of regulated Mobile Services, including funding enhancements where required, MCSA will be resourcing the services through the transition.

## **5. Conclusion**

This document argues that regulated Mobile Children's Services become in-scope under the National Quality Framework, sooner than later.

The history and current circumstances of these services is such that the transition should be reasonably smooth.

MCSA has described a transition strategy for the services and will support the services through the transition.

Tim Keegan  
Executive Officer

**June 2013**

## **Attachment 3 – An Introduction to Mobile Children’s Services in NSW**

Mobile Children’s Services provide flexible, responsive and innovative services to children and families experiencing social, geographic, cultural or economic isolation or a combination of these. Focusing on the care and education of children, they aim to ensure that children and families in isolated and disadvantaged communities in rural, urban and remote areas have fair and reasonable access to good quality, safe children’s services.

Through their work with children, Mobile Children’s Services support families, the parenting role, local communities and the economy, consistent with an ecological model of child development.

Mobile Children’s Services operate from a base such as Bankstown, Bourke, Moree, Inverell, Hay, Broken Hill, Maitland, Marrickville and Penrith outreaching into the isolated communities.

There are currently 115 Mobile Children’s Service ‘projects’ in NSW sponsored by 73 organisations.

The Mobile Children’s Services Association of NSW Inc. [MCSA] is the peak advocacy and resourcing body for Mobile Children’s Services in NSW. The Association’s *Mobiles Resourcing Project* [MRP] resources services in NSW by providing information, advice, referral, mentoring, advocacy, networking and training. The Project is funded by the NSW Department of Education and Communities [DEC].

There are several types of Mobile Children’s Service. They work in hundreds of communities with thousands of families and children, in a range of ways, breaking down the barriers of isolation by being responsive to the particular circumstances and needs of the children and families in those communities.

Mobile Children’s Services are a very practical and cost effective means of providing access to services and an equitable amount of society’s resources to those in isolated circumstances.

**Whilst being cost-effective, Mobile Children’s Services are not cheap: Access, safety, quality and good management have a cost.**

Most Mobile Children’s Services in NSW are involved in the direct care and education of children. Services aim to support the achievement of a child’s full potential. Research on the development of children’s brains and the deleterious effects of under-stimulation, neglect or abuse, underline the crucial role that structured early childhood activities provided by competent services can play in the development of children as well as in supporting parents.

**A significant number of children in NSW would not have the opportunity to participate in early childhood development activities without the access provided by Mobile Children’s Services.**

Mobile Children’s Services also have a history in ‘intervention support’ of children with additional needs as well as ‘early intervention and time-out support’ for children in ‘at risk’ circumstances or where parents simply need respite.

The day to day operation of many of the services involves the participation of parents. This is particularly so in the Mobile Playsession Services where parents stay at the session and participate in the program. This is a welcome socialising opportunity for parents and also

creates the opportunity to learn about and discuss community, child development and parenting issues. The services are important generators/facilitators of social capital in isolated communities. They provide the ‘village pump’.

Most Mobile Children’s Services in NSW are ‘community managed’ and were set up through a community development process. Again, community managed services are an important generator of social capital and provide a sound base for the development and maintenance of strong and resilient communities.

The ‘mobility’ of these services is about ***fair and reasonable access***.

Mobile Children’s Services are an effective strategy where it is not possible or economic for services users to travel to a service, where centre based services are not yet available or would never be available or where there is a need for flexibility and responsiveness.

Within the ‘outreach/mobility’ model, the goals of flexibility and responsiveness produce innovative service types in the varied communities of NSW. From Community Access Mobile Minder Services [CAMMS] serving the needs of CALD parents and children throughout Sydney to ‘play session’ Mobiles serving the needs of families on properties west of Bourke, the themes are ‘children’, ‘families’, ‘child development’, ‘parenting’, ‘isolation’ and ‘access’.

There are several types of Mobile Children’s Services:

**Community Access Mobile Minder Services [CAMMS]** supervise groups of children while their parents are engaged in a range of activities put on by other community groups [Mostly] or organised by the parents themselves. These activities include training, self-development, education and recreation. Sessions are held at the premises of neighbourhood centres, Family Support Services, Young Parent Programs, TAFE’s and other community facilities, normally in an adjacent room to the parents. Parent activities generally involve a 10 week program of some sort, with the occasional shorter program or one-off session. These services are not regulated. The parents still technically have care of the children and must be in the “immediate vicinity”. This is a form of ‘adjunct care’. Attendances are usually under 10 children per session. There are 11 of these services in NSW, each service generally covering one LGA. All services are in Sydney and are funded by NSW Department of Education and Communities. For example, in one term, Community Access Care Pair [Penrith] provided a service to 264 children and 225 families over 82 sessions in 12 communities in the Penrith Council LGA. CAMMS contribute enormously to the capacity of the many agencies in local community service systems to work with parents on their life issues. They have become essential components of local community service systems. CAMMS have been particularly supportive of culturally isolated communities. ***Each LGA should have a CAMMS!***

**Mobile Preschools** operate in rural and urban fringe areas, often outreaching from a regional centre to venues such as community halls in very small towns or hamlets. Services can travel from 20 minutes to 1.5 hours to a venue and may offer sessions between 3 and 6 hours duration. Services provide their activities at up to four different locations per week. As parents are not present, the services have ‘care’ of the children and are regulated by NSW DEC. Attendances are usually 10 to 20 children per day, depending on the population density of the drawing area and the capacity of the venue. Services include a transition to school program in their activities. For example, in one term, Gwydir Mobile Children’s Service [Moree] provided a service to 86 children and 82 families over 45 sessions in 7 communities. They offer structured early childhood sessions for mainly 3 to 5 year old children. They provide a service where there is no reasonably accessible centre based service.



**Mobile Child Care Services** operate in smaller but relatively densely populated agricultural communities and offer care and education for 0 to 5 year old children over a longer day, similar to Long Day Care. Again, services may travel up to 1.5 hours from their base and may work in up to four communities per week. Attendances range up to 20 children per day but are usually limited to under 15 children per day because of the 'difficult' nature of the venues and the high care needs of under 3 year old children. For example, in one term, Cowra Early Childhood Mobile Service provided a service to 108 children and 81 families over 49 sessions to 7 communities. Children and families do not have reasonable access to another care and education service. These services are particularly appreciated by farm and small business families during BAS week. They are based at Tumbarumba, Cowra, Crookwell, Condobolin, Deniliquin and Albury-Wodonga. All these services are funded by DEEWR.

**On-farm Care Mobile Services** offer care for children on rural properties – This is currently of a short-term duration with no 'stay-over' for the carer. There is limited availability of this type of care.

**Remote Area Mobile Play Session Services** operate in the remote areas of NSW, mainly west of the Newell Highway. They offer structured early childhood sessions for 0 to school-aged children as well as recreational activities for children up to 13 years at community venues and on rural properties. They play a major part in the social and educational infrastructure in remote areas. Services may travel up to 2 hours to a venue and travel up to 40,000km per year. Some services travel to small towns and stay overnight, visiting properties on their way to and from these small towns, on a weekly circuit. Because the parents themselves often travel up to 1.5 hours to get to venues [Often local properties where they take turns to 'host' a session], they are usually present at the sessions and parents **generally** have care of the children. Attendances range from a few children on a property to up to 30 children at a play session in a small town, plus their parents. Most of these services provide activities for children during community days such as Agricultural Field Days or Gymkhanas. Many of these services are regulated on the basis that they occasionally do have care of children. They cover vast areas of the west of the state and are often the only local community service. For example, in one term, Paroo Contact Children's Mobile [Based at Wanaaring, a town of 60 people situated 200 km on the gravel road west of Bourke], provided a service to 119 children and 60 families over 31 sessions in 14 communities and properties in the north-western part of NSW and SW Queensland. Paroo Contact Mobile travels 40,000km per year and covers an area the size of Tasmania. As with the other remote area Mobiles, the toy library is an important strategy at Paroo. These services offer early childhood activities ranging from group work to one on one support as well as assisting parents on child rearing.

**Urban Area Mobile Play Session Services** operate in rural/urban fringe and inner city areas, offering structured early childhood sessions for 0 to school age children at community venues. They are not regulated. The parents have care of the children. Activities are focused on both children and parents. Attendances vary from 5 to 20 children at a suburban play session to 100 children at a community fun day. They are very important for generating social capital in urban development areas. The Magic Yellow Bus from Marrickville often has 100 children and 70 parents at its park sessions.

**Early Intervention Mobile Services - Disability** operate in different ways in the various communities. They usually travel to the smaller and isolated communities, offering play sessions and opportunities for parents to discuss the development of their children as well as offering intervention strategies for children with a disability. Some offer 'reverse integration' play sessions as well as toy library.

**Mobile Toy Libraries** provide parent support and play opportunities for children as well as the loan of toys and equipment. Most services have a regular route, either throughout one

or two urban council areas or through several communities in a sub-region. Many Mobile Services provide toy library as a complementary activity to preschool or play sessions.

**Occasional Care Mobile Services** provide regulated occasional care for 0 to school age children in community facilities.

**Early Intervention Mobile Services – Family Support** provide structured early childhood playsessions, advice, referral and support specifically to stressed families and communities, where isolation may be caused by geographic, economic, social status or cultural factors. They are generally called ‘supported playgroups’ and attempt to provide early childhood expertise combined with family support expertise. They require staff with a particular skill set and sponsorship by an organisation that has the capacity to support staff on difficult issues. MCSA believes that a combination of early childhood and welfare skills in these services is an important way to better support children & families.

These are the broad types of Mobile Children’s Services – Being responsive to the circumstances of their families, they all operate in different ways. It should be noted that some services offer a combination of the activities such as care, play session and toy library. Some work in the mainstream community, some with stressed communities and some across all types of communities: **Whatever the community needs.**

The majority of Mobile Children’s Services are funded by the NSW Government through the Department of Education and Communities’ *Early Childhood Education and Care Grants Program*. Families NSW and Brighter Futures also contribute funds to some of the CAMMS and play session services. The Federal Government funds 16 of the services, mainly through the Department of Education.

Mobile Children’s Services are an essential part of the social fabric and community service and educational infrastructure in many areas of NSW. The hands-on/can do nature of the services and the commitment of the staff and committees, make them a trusted and valuable part of their many communities.

This **embeddedness in their communities** makes them an ideal vehicle to provide a range of important services to children and families. They act as a non-stigmatised entry point to the community service system. Their flexibility allows them to respond to the changing needs of their communities as well as allows them to support the initiatives of other community, health or educational agencies.

NSW is the pre-eminent state in Australia for Mobile Children’s Services. They are particularly aided by a practical and flexible form of regulation in NSW: *Children (Education and Care) Supplementary Provisions Regulation 2012*.

There is no other ECEC service system in the world with the geographic coverage and range of service delivery strategies provided by NSW’s Mobile Children’s Services.

Nevertheless, there are still children and their families and communities who do not have reasonable access to an early childhood development experience. There is still work to do.

Website: [www.mcsa.org.au](http://www.mcsa.org.au)

Photosite: [www.flickr.com/photos/mcsanswinc/](http://www.flickr.com/photos/mcsanswinc/)

MCSA

**May 2013**