

MADCAPS Management Committee PO Box 255 Merredin WA 6415

27/03/2014

Dear Minister.

MADCAPS (Merredin and Districts Childcare and Play School) is a not-for-profit, committee run, long-daycare centre located in the WA Wheatbelt approximately 260km from Perth. Since opening in 1988 MADCAPS has operated as the regions only childcare service and it presently services Merredin and many surrounding shires. In 2013 our centre provided care for 54 families with only 7 of these being non-working families. Our service supports many people in our community to attend employment while their children receive high levels of care. Our parents are workers in healthcare and education, local business owners and operators, retail workers and agricultural employers and workers. This essential and highly valued community childcare service is under threat of closure due to the unrealistic and unreasonable regulation changes that have been enacted in our industry during 2013 and 2014.

As a not-for-profit centre, our service relies on volunteers to manage the overall running of MADCAPS. We have an outstanding staff including a proactive Coordinator who is doing well to stay at the forefront of the regulation changes and trying to ensure we are meeting them. We have 9 staff members including 3 qualified full time educators, 2 part time educators and 4 casual educators. We do not have a 'pool' of staff to draw from and find staffing a significant issue in our region.

We are facing several challenges in 2014 as a result of the regulation changes. These include staffing, managerial and financial issues. In addition to these challenges we strongly feel that the regulatory changes are in fact having unintended and negative consequences on the quality of care being provided due to the ineffective 'one-size-fits-all' approach being employed.

## Staffing challenges

Although we encourage and support staff endeavoring to earn their qualification, unfortunately there are few in our region. When positions for qualified staff are advertised we have limited success in securing applicants who are prepared to travel and live outside the metropolitan area. We were lucky to employ a staff member via sponsorship on a 187 Visa in 2013. However, this demonstrates that we cannot fulfill staffing requirements locally or even nationally and need to seek international employees to meet regulatory requirements.

New regulations require a larger percentage of staff to be qualified and more qualified staff must be on site during lunch breaks. This increases the cost of wages and makes staffing difficult as we do not have a large pool of qualified staff within the local community. It is nearly impossible to meet the requirements when qualified educators are away due to illness, annual leave or unexpected leave. Without waivers our centre would face closure. Furthermore, staff feel obligated to come to work unwell to ensure the centre stays open and even forgo lunch and tea break to meet staffing requirements and ensure a high quality of care to our children and families. This is unfair, illegal,

unsustainable and not best practice as this doesn't help with controlling spread of infection within the centre.

We are required to employ an Early Childhood Teacher to meet new regulations. The centre has advertised this vacancy since October 2013 and received no suitable applicants. As a result we must continually advertise at great expense and apply for waivers (at a cost of \$102 per application, plus extensive time to complete the application paperwork) because we are unable to meet this regulation. These waivers only last 6-12 months and are a continuing cost to the centre. More worrying still is the fact that we will not be able to continually receive waivers, eventually being denied. In addition we are incurring costs to continually advertise the position in order to meet waiver requirements.

## **Financial Challenges**

As is the case in many industries, MADCAPS has experienced a loss of financial support due to budgetary changes at federal, state and local government levels. Our local shire, who have provided financial support to our service since its opening, is reviewing and possibly withdrawing its contributions due to budgetary constraints. In the past MADCAPS has been fortunate in securing many grants from state and federal government. However, during 2013 and the start of 2014, grant applications that have historically been successful, have been both denied and reduced. There also appears to be a trend to the diminishing availability of state government 'Royalties for Regions' funds. Although as a result of good financial management MADCAPS does have some contingency funds, the reality is that at present our annual income does not cover our annual expenses. This is an unsustainable situation when considered in addition to the previously stated increased costs of staffing and decreased financial support available. In response to these financial strains, MADCAPS only option is to increase fees for our families or close its doors if it becomes financially unviable. This would have a significant impact on the community and local businesses of Merredin.

## **Managerial Challenges**

At MADCAPS our centre philosophy recognises the importance of abiding by the relevant laws and policies that related to the provision of quality children's services. Although we agree wholeheartedly with the reason behind the regulatory changes (to improve practices and the quality of care in childcare services) it is putting undue stress and taking up considerable time for our centre Coordinator to attempt to keep up with the changes and meet them on a daily basis. Our very passionate and dedicated Coordinator is having to continually research and seek information on the changes and is often stressed. Instead of spending time in the rooms with the children as a qualified educator, she is having to spend more and more time in the office. Completing the paperwork required for one waiver took our Coordinator one office day. In addition she is trying to ensure that appropriate staffing is maintained throughout the week and this is a continual and daily challenge with last minute changes in numbers of children in the rooms, staff taking leave for illness or other reasons and needing to ensure all staff have appropriate breaks while maintaining the correct number of educators. These regulations are at risk of causing some of the best and more passionate people in daycare to burn out, leave managerial positions and potentially the childcare industry.

## Concerns about unintended consequences

Finally, we believe that these regulatory changes are having unintended negative consequences on the quality of care being received by children at our service. For example, the quality of care is reduced when staff feeling obligated to come to work sick / over worked / not having required breaks in order to meet the regulatory constraints. This is also causing good staff to leave the industry due to stress. Staff, in particular our Coordinator, are spending unprecedented hours understanding and meeting the regulatory changes. This is removing them from care giving as well as decreasing their ability to complete programming, planning and reflecting tasks directly related to quality childcare and education. Yet another unintended negative consequence of the staffing requirement is inconsistent educators being used in our rooms during break times. This is due to qualified staff having to move between rooms to cover other qualified staff members who are on lunch breaks. This means that children are cared for by someone who is potentially less familiar with them and the program occurring in the room, and this can be quite distressing to the young children in our care. If we were able to cover lunch breaks with our Certificate III staff, the staff member already working in

the room would be able to stay and maintain consistency for the children when the qualified staff member is out of the room for lunch. We understand that it is essential to have qualified staff on premises and a certified supervisor at all times, however do not see the benefit of moving an unfamiliar staff member into the 0-2 room just to meet a staffing regulation for a one hour period of the day.

We at MADCAPS sincerely hope that these pressing issues are raised at all relevant government levels and that the regulations and legislation related to childcare are removed or at least reviewed to consider the reality of smaller regional centers like ours. It is our common mission to provide high quality care to children. In order for MADCAPS to continue providing this service in the future we require support from government in the form of changes and/or continuing waivers for our centre when attempting to meet these new regulations.

Yours faithfully,

Rebecca Ryan for and on behalf of the MADCAPS Management Committee