

Maitland Baptist Church Childcare Inc.'s responses to the Draft recommendations, findings and information requests of the ECEC Productivity Commission Draft Report

Families using mainstream services – improving the accessibility, flexibility and affordability

DRAFT FINDING 9.1

- Agree *

DRAFT RECOMMENDATION 12.2

- Agree *

DRAFT RECOMMENDATION 12.4

- Generally agree, plus comments *

OOSH Comments

Dot point 3 re: determine annually the hourly deemed cost of care etc. Agree

As long as the benchmark price takes into account, varying and differing rents, & different costs in different areas. Should be at the higher end of the scale to avoid centre closures.

Dot point 5 re: pay the assessed subsidy directly to service provider etc. Strongly Agree

The current system leaves services with a debt because some parents use the service and get the subsidy but then do not pay the bill owed to the service. They get free childcare, and make money from the subsidy. When the service is withdrawn from the parent, they just go to another service and do the same thing.

LDC Comments

In addition, allow a more flexible approach by ECEC providers being able to contact the financial provider directly instead of going through a third party, currently we cannot contact Centrelink direct on behalf of the parents.

DRAFT FINDING 12.1

- No Comment *

DRAFT RECOMMENDATION 12.3

- No Comment - LDC - Agree with recommendation

INFORMATION REQUEST 13.1

- No Comment *

INFORMATION REQUEST 12.1

- Comment *

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OOSH Comments

Under the proposed subsidy changes it would appear that a family with 2 to 4 children would notice a big difference in cost of service. Big families would be penalised and single parents would be affected with the change. We recommend that the system continue as is.

INFORMATION REQUEST 12.2 - No Comment *

INFORMATION REQUEST 12.3 - No Comment *

INFORMATION REQUEST 12.4 - Comment

Service cost premiums will vary due to different premises costs, varying educator skill levels and varying rates in different areas.

INFORMATION REQUEST 12.5 - Comment

Eligible grandparents should have access to benefits and care because as the primary carer they need to be able to utilise OSHC and Vacation Care for rest periods so they have energy for outside ECEC times. They are helping the system, saving money, by providing care and a loving environment for children affected by parents who may have drug related issues, death of parents or any other extreme issue. It should be noted that grandparents should be checked so they are not able to claim money for nothing.

LDC Comments

Totally agree with the view that the children of eligible grandparents should not be disadvantaged because they have no parents looking after them. Children being cared for by grandparents are helping the system and, saving the government money and carers in relation to long term fostering placements. Therefore any financial assistance that is able to be granted to them to benefit the children in their care should continue.

DRAFT RECOMMENDATION 8.3 - No Comment *

DRAFT RECOMMENDATION 8.4 - No Comment LDC - Agree with recommendation

DRAFT RECOMMENDATION 8.5 - Agree, plus comment *

OOSH Comments

Nannies should be made to have qualifications and should follow the industries guidelines. Financial assistance should be provided for nannies to achieve the qualifications.

DRAFT RECOMMENDATION 8.7 - No Comment *

INFORMATION REQUEST 8.3 - Comment *

Agree that places created by children on extended absences can be made available to other children on a short term basis and couldn't foresee any reason why this couldn't be done. One disincentive is that if the centre is at capacity and the child returns, having to stop the short term

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spot could cause issues for the child and family. They would have to inform parents that it is only short term and not a permanent place.

LDC Comments

This measure could create an unworkable situation with parents not being able to access ECEC should they go on an extended holiday for instance. Flexibility in ratio of children per centre may be factored in.

Additional needs children and services – improving the accessibility, flexibility and affordability

DRAFT FINDING 5.1

- Agree *

DRAFT FINDING 8.1

- Agree *

DRAFT RECOMMENDATION 12.6

- Agree, plus comment *

OOSH Comments

Agree with the recommendation however in relation to dot point 3 re: The Inclusion Support Program. It is mentioned about modifications to facilities and equipment etc. As most of our services operate from School grounds, there is a difficulty getting anything modified, due to some school principals being resistant to any changes or ideas, and the lack of storage for equipment and gear. The Education department's legalistic views and strict licences imposed on OSHC services through the Assets Management Unit regarding the use and conditions of use of the facility either a hall, a classroom or library etc. also contribute to the difficulty. Whilst some schools are embracing of the service others are not. Some schools view your presence as an inconvenience especially with the use of their facilities.

LDC Comments

The question arises who would assess the support access needs . Docs is already stretched to limit and it our opinion that a lot of children with additional needs will fall through the gap.

INFORMATION REQUEST 12.7

- Comment *

OOSH Comments

There may be so many different things needed to accommodate inclusion of children with additional needs e.g. additional staff and staff training, construction of physical barriers and structures, special areas constructed and facilitated as well as special equipment. Perhaps an Application based yearly grant system where services must apply by completely developing a plan that genuinely displays staffing, training, facilities, equipment as well as the supporting documentation proving successful outcomes. One of the biggest problems is allocation of staff and cost coverage of staff. For each additional needs educator that is subsidised by the Government there is a different that the service must carry; e.g. \$17.19 subsidy versus the wage \$25/hour. Being a larger Not-For-Profit we can carry the difference and support the service however for smaller services the gap is too big and consequently they can't offer many places to additional needs

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children. Application submissions should indicate type of disabilities catered for, taking into account site allowances and restraints and the appropriate costings needed to run the service.

DRAFT RECOMMENDATION 12.7	- <u>Agree</u> *
DRAFT RECOMMENDATION 12.8	- <u>Agree</u> *
INFORMATION REQUEST 12.8	- OOSH No Comment *
DRAFT RECOMMENDATION 13.1	-OOSH No Comment *
INFORMATION REQUEST 8.1	- OOSH No Comment

LDC Comments

ECEC providers currently can refuse to accept special needs children where there is a perceived lack of trained carers or where the special needs child is not controllable. Additional Costing is not the only criteria, children should be assessed for suitability by trained psychologists, in conjunction with the ECEC provider

Barriers faced by families when accessing appropriate ECEC services is a lack of knowledge. Families are currently unsure of how the NDIS system works, and what to do, especially those families that may be moderately globally delayed. Some of these families do not have the skills to find the best care for their child's needs, and don't know where to begin to search. The commission needs to look into a way to empower these families through local meetings and explain this information to these families. The cost involved for services can be large when enrolling an additional needs child, or a child that educators recognise as having additional needs that have not yet been diagnosed. Some of these needs can be extreme when it comes to an Early Childhood setting, and even though the child is not diagnosed, may still require a lot of individual attention from educators, thus requiring the service to employ an additional educator before funding is granted. We also need to take into account that it can take some months to get a diagnosis for these children, thus getting the additional funding needed to provide additional staff. When accepting additional needs children into a centre, management need to take all of this into account, along with how many additional needs children are already in the room that the child will need to be placed in.

INFORMATION REQUEST 12.9	- OOSH No Comment *
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LDC Comments

Children that are developmentally vulnerable are children that not only have additional needs themselves, but whose parents may have a developmental need, who may come from a low socio economic environment, whose parents may be young and have no older role models to learn from. In services, these children can be identified through watching the children play...and seeing whether it is developmentally appropriate, along with open discussions with the families of the children who are in our care. In society, the commission could look at all of the current government systems that would already have this information regarding low socio economic areas, health units, and children at risk. From here, we can connect with relevant early intervention groups, team the families with support networks, and form individual plans to assist each child.

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INFORMATION REQUEST 9.1	- No Comment *
DRAFT RECOMMENDATION 5.2	- <u>Agree</u> *
INFORMATION REQUEST 8.2	- No Comment *
DRAFT RECOMMENDATION 12.5	- No Comment *
INFORMATION REQUEST 12.6	- No Comment *
INFORMATION REQUEST 13.2	- No Comment *

Preschool – supporting universal access

<i>DRAFT FINDING 5.2</i>	- No Comment *
DRAFT RECOMMENDATION 12.9	- No Comment *
DRAFT RECOMMENDATION 12.10	- No Comment *
INFORMATION REQUEST 5.1	- No Comment *
DRAFT RECOMMENDATION 5.1	- No Comment *
DRAFT RECOMMENDATION 7.9	- No Comment Agree
INFORMATION REQUEST 12.10	- No Comment *

Outside school hours care – improving the accessibility, flexibility and affordability

DRAFT RECOMMENDATION 7.4	- <u>Agree</u> , plus comment *
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OOSH Comments

Currently there is no qualifications required however the industry is gearing up for the implementation and our services policy is to have at least 2 fully qualified educators (Cert 3 in Childcare Services or above) at every service. Qualifications should be implemented however it is important to note that due to the short term employment opportunities e.g. 3 hours a day; in some cases there is not enough hours in the week for potential employees to fund the required qualification needed to work in the industry. Funding for the qualifications or part thereof should be provided so potential employees can afford qualifications. Further it is recognised that utilising older workers and university/TAFE students is a valuable contribution to the childcare industry. Utilising these groups not only allows the organisation and community to benefit, it also benefits the individual by allowing university/TAFE students hands on experience and for the older generation to pass on experience for example. Currently, our services operate with ratios as follows; 1:5 for Water Activities; 1:8 for Excursions and 1:15 for service delivery at all centres; which we find acceptable and workable. As per policy all small centres have two staff regardless of numbers below 30.

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DRAFT RECOMMENDATION 8.1 - Agree, plus comment *

OOSH Comments

Not against the change if staff ratios remain at our current policy which is; 1:15 etc. However if there is a requirement to increase staff ratios due to younger ages coming into the service, then funding will need to be provided or the cost of the service will increase.

DRAFT RECOMMENDATION 8.2 - Strongly agree, plus comment *

OOSH Comments

Strongly agree that schools take responsibility for organising the provision of OSHC services and in some cases this happens. It would be advantageous for all OSHC services if schools/principals along with organising the service also assist, work with and embrace the service as a valuable asset to the school. Being an OSHC service operating on school grounds, sometimes the service is viewed as an inconvenience and therefore treated very poorly, which makes it very difficult to deliver the service to the Framework National Quality Standard (Framework NQS). Schools in NSW are under the Department of Education, the buildings are managed by the Asset Management Unit (AMU) of the Dept. who handle the issuing of licenses for the use of halls, buildings etc. It has been our experience in recent times that, apart from the AMU not communicating with the school, the tactics used when negotiating those licenses was very confronting and very demanding especially in relation to the demand for schools to reap the benefits of any surplus generated at the school and that the agreements had to be signed in a minimum set time frame. Being a Not-For-Profit organisation and having 9 centres, in some cases the larger centres actually support the smaller centre and contribute to keeping it open. Ultimately if Not-For-Profits are penalised and fees are increased, it's the families who will bear the cost and in cases where small centres are being carried, those centres may have to close due to their unviability. It is also noted that through our experience it is very clear; there is little to no communication between the departments within ACECQA.

We pride ourselves on delivery of service, and this is exemplified in our recent 7 assessment ratings with all seven centres getting 'Meeting Requirements' however it is very difficult in some cases to deliver a service that meets or allows for us to provide the best possible environment to meet the Framework NQS when so many standards and requirements conflict within the Government's departments.

Removal of ECEC assistance to some providers

DRAFT RECOMMENDATION 5.3 - Agree *

DRAFT RECOMMENDATION 8.6 - Agree *

DRAFT RECOMMENDATION 9.1 - Agree *

DRAFT RECOMMENDATION 10.1 - Agree *

DRAFT RECOMMENDATION 12.1 - Disagree, plus comment *

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OOSH Comments

Removal of the payroll tax exemptions will have an adverse effect on the service. Fees would have to increase which would impact on our low service delivery prices. Parents would pay more which could see children withdrawn from the service or less bookings. Why penalise the users of the not for profit sector who are instrumental in keeping child care costs down right along the whole spectrum of ECEC providers. To be competitive applies to all.

DRAFT RECOMMENDATION 12.11 - No Comment *

Workforce participation

DRAFT FINDING 6.1 - Acknowledged *

DRAFT FINDING 6.2 - No Comment *

DRAFT FINDING 6.3 - No Comment *

DRAFT FINDING 6.4 - Agree *

DRAFT FINDING 6.5 - Acknowledged *

DRAFT RECOMMENDATION 6.1 - Agree *

INFORMATION REQUEST 6.1 - No Comment *

Quality assurance processes and regulation of ECEC

DRAFT RECOMMENDATION 7.8 - Agree *

DRAFT RECOMMENDATION 7.1 - Strongly agree, plus comment*

OOSH Comments

This is a sensible recommendation. Some of the elements and standards of the Framework NQS should be retained as they are good initiatives; however the educational and child-based reporting requirements are impossible to implement due to the many and varied times that children come and go and as parents pick up and drop off.

LDC Comments

The NQF introduced into the Long Day Care Industry has effectively increased staff costs/involvement and qualifications. Although there is no doubt that the quality of Child Care education has increased, it has come as a cost to the child care users. A lot of staff time is taken up with bureaucratic requirements which decreases the actual practical side of Child care and supervision.

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- DRAFT RECOMMENDATION 7.2** - No Comment *
- INFORMATION REQUEST 7.1** - No Comment *
- DRAFT RECOMMENDATION 7.3** - No Comment *
- DRAFT RECOMMENDATION 7.5** - No Comment *
- DRAFT RECOMMENDATION 7.6** - Agree, plus comment *

OOSH Comments

Our organisation has had 7 of our 9 centres assessed. All services operate with the same documentation, policies and standards. In relation to quality of assessments, our seven centres all received 'Meeting Requirements' however during the course of the assessments inconsistencies were evident due to the different assessors who conducted the assessments. Examples: Staffing Arrangements – I assessor gave an 'exceeding rating' and another 'meeting requirements'; Some assessors are extremely Long Day Care minded; we were asked to produce an ELF which is only used in Long Day Care Centres.

Observations – We believe that learning stories for school age children is not needed. Having to compile those takes educators time away from the children. Children often come into our care at 6.30am, we deliver them to school, we pick them up after school, give them afternoon tea, say goodbye to them at 6.00pm. They go home, shower/bath, have dinner and for some homework if they hadn't completed it with OSHC and then its bed. We need to be able to devote quality time with them by playing and interacting with them, not focusing on writing stories and notes about them.

Agree with abolishing of the 'Excellent' rating, there is no need for it.

LDC Comments

One of the shortcomings of the assessment is that different assessors with different criteria are assessing centres against each other to achieve the ratings. Unless the same person assesses the centres within a region it appears to be impossible to rate one centre over another. Some 7 qualities are examined and not all of these can be assessed on an objective basis, considering the demographics of the location of the various centres,

- DRAFT RECOMMENDATION 7.7** - Agree with some aspects, plus comment *

OOSH Comments

Dot Point one: abolishing requirement for cert. supervisor.....**LDC** do not agree, running with fully qualified supervisor staff works and should be kept in place, however some leniency for staff who become sick would alleviate any difficulty with qualified staff shortage in the short term.

Dot Point two: provide more detailed and targeted guidance strongly agree.

Dot Point three: review..... strongly agree.

- DRAFT RECOMMENDATION 7.10** - Strongly agree, this should be nationalised.
- DRAFT RECOMMENDATION 7.11** - Strongly agree
- DRAFT RECOMMENDATION 7.12** - Agree with all points except point 4, plus comment.

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LDC Comments

Dot Point 4: not impose regulations Disagree with not imposing regulations on Long Day Care Centres as most centres have a limited area for children, however if the premises and area allows for numbers to exceed childcare places then we agree e.g. OSHC centres on school grounds would have the ability to cater for more places.

DRAFT RECOMMENDATION 11.1 - Agree *

Ongoing support for evaluation and program assessment

DRAFT RECOMMENDATION 5.4 - No Comment *

DRAFT RECOMMENDATION 13.2 - Strongly Agree *

DRAFT RECOMMENDATION 13.3 - Agree *

