# **Productivity Commission Submission**

## Pages 43 & 44

Transition to ECLS for In Home Childcare – In Home Childcare not able to claim ECLS until they are under the NQF scope

When will this transition happen?, how will services provide continuing education and care to families currently not able to access mainstream childcare if this does not occur prior to these be implemented. This is very unfair on service providers, will the IHC sector have some input into this transition process?

Nannies able to register and claim the ECLS from Centrelink, who will monitor the Nannies? The department are not able to monitor and access the childcare services currently under the NQF with approx. 71 IHC service Australia wide if all of the trained Nannies register direct with Centrelink how will the department monitor and support them???

From experience the fact that a person has qualifications does not mean they are a fit and proper person to provide care for children, the IHC sector has come so far over the past 12 years and is gaining a very professional and respected reputation, this process will jeopardise the entire IHC reputation

ECLS hours being 24 or 50 per week for parents who are studying or working. Many vulnerable children access childcare, under the new system these children will not be able to attend childcare, the flow on effect for families not able to cope will produce a larger burden on the already stretched welfare and support agencies. A 3 tier system would be an option 12 hrs 24 hours and 50 hours per week

## Page 46

How will the transition process for IHC happen- Page 56 Draft Rec 8.6 it states that In Home Childcare will be abolished yet talks about transition to NQF, this seems to be contradictory, if IHC is abolished what will replace it, will the IHC sector have input and consultation around this.

Per child subsidy not adjusted for the number of children in care, this again will have a huge impact on families and raise the cost of childcare.

## Page 47

The costs to service in rural and remote regions in supporting children and families are much higher, in many areas the rate of DV, unemployment, mental health issues drug and alcohol addition is much greater, the services to support these families are limited and child care services often work in conjunction with other support agencies to ensure these children are monitored and supported. This has a flow on effect as then families do not enter the child protection system

Grandparents taking on responsibility of their grandchildren is increasing, at a stage in life when grandparents s are traditionally heading for retirement many are taking on the role of parents, the impact on these grandparents is huge, financially, emotionally and physically and adjusting to the current social and generation differences even within the school system places a huge strain on families. GCCB is currently restricted to grandparents receiving a payment through Centrelink,

without these grandparents children would be entering the out of home care situation at a huge rate, as a society should we not be supporting these grandparents and assisting them to raise their grandchildren

#### Page 48

How will nannies be monitored? How do we ensure the children being cared for in the families homes are getting the best possible care and education, Nannies and educators should be continually monitored and supported through a services, IHC sector has lobbied to be included in the NOF and would welcome this move.

## Page 53

IHC is ideally situated to provide education and care to children in vulnerable situation and to support families to access assistance through other agencies, there are many benefits to having a person in the home to monitor children at significant risk and the benefits of integrating services and having that monitoring and reporting process.

How this can be achieved needs to be looked at

## Page 54

Preschools s provide education and care for children the same as all other childcare services and should therefore come under the same NQF. This provides consistency for series, staff, children and families

#### Draft Rec 10.1

Removing services from eligibility to claim payroll and fringe benefits tax would put a great strain on services especially community based who run to a very tight budget and continually face budget cuts already

### Draft Rec 7.2

To reduce the qualification requirements would be taking a step back qualification should remain the same, evidence shows that the first 3years of a child's life is when the most learning occurs and sets them up for their entire life, the Cert 111 while being very beneficial does not necessarily give the educator the skills and experience to provide the education and care a child under 36 months requires.

# Page 60 Draft Rec 7.6

Abolish excellent rating, this is set for the services in a position to pay, many services deserve the excellent however due to funds are not in a position to apply, this is unfair.

The wording Working Towards to a person not understanding the current system implies that the service is not meeting the requirements under the NQF, 3 tier assessment would be simpler and easier for all to understand:

Significant Improvement required Meeting Standards Exceeding Standards