



Productivity Commission public inquiry into future options for childcare and early childhood learning

This submission responds to the Productivity Commission Draft Report, released in July 2014. It builds on our earlier written submission and is informed by the Wheatbelt Regional Children's Services Plan (WRCSP).

The WRCSP project forms part of the state wide initiative of the Department of Local Government and Communities to develop specific children's services plans for each of the nine regions in Western Australia. Each of the regional plans will be used to inform a State wide plan.

In developing the Regional Children's Services Plan for the Wheatbelt our organisation has undertaken extensive consultation with a broad range of stakeholders including early childhood education and care service providers and community members who either currently access these services or will have a need to access these services in future. Five key areas of focus for this Plan and future action have been identified and they are:

- Fragmentation of service delivery, which refers to the lack of coordination of activity aimed at improving services and support for the children's services sector
- Workforce development challenges, which acknowledges the difficulties in attracting and retaining qualified staff.
- Inefficiencies in the provision of infrastructure and equipment. This focus area looks at the myriad of infrastructure that is available for childcare services in the region and the ability for the infrastructure to meet the requirements of the National Quality Framework.
- Unsustainable governance structures looks at the huge reliance on volunteer committee members to manage childcare services and the potential for burnout as a result of the expectations placed on them.
- Limited community awareness and engagement is the final focus area and refers to a general lack of understanding about what services and support are available within the region and how to access these services.

Research and findings from the WRCSP lends to overall in-principle support for many of the recommendations made by the Productivity Commission in the draft report. We have identified those considered likely to have the most positive impact on the Wheatbelt region and other rural and remote areas.

Families using mainstream services- improving the accessibility, flexibility and affordability.

- A single child-based subsidy available to both approved centre-based or home-based services will simplify the system and assist community understanding and accessibility.
- RDA Wheatbelt supports an annually determined hourly deemed cost however this will need to acknowledge and compensate for the higher cost of living and providing services in regional, rural and remote areas.
- Abolishing operations requirements for minimum or maximum operating weeks or hours for services approved to receive child-based subsidies would address a major and ongoing issue for Wheatbelt services. Other regulatory barriers must also be addressed such as the removal of caps on the number of occasional care places. The Wheatbelt has limited services available.

 Approved Nannies – this is a key solution for the Wheatbelt especially for more isolated areas and essential services and shift-workers.

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

RDA Wheatbelt supports the intent of recommendations within this theme. There are limited specialist services available outside the regional centres in the Wheatbelt. Access to existing mainstream services would assist both additional needs children and support families as many service opportunities are not available in the Wheatbelt (e.g. Budget Based Funder Programs).

The WA Australian Early Development Census (AEDC) is above national average (in Western Australia, the 2012 results show that 23.0% of children were developmentally vulnerable on one or more domains compared to 22.0% nationally) and must be addressed. Innovative programs such as the "Kids Health Link" program at the Merredin College can support relationships and early identification and referrals for assistance.

There is concern regarding management of proposed grants and possible delays in assessment that might impact on continuity of service provision to those most at need. We believe many of the recommendations will not be achievable without a cohesive supported system of rigour that ensures locally driven outcomes with support from existing agencies.

For the Wheatbelt - Recommendation 12.5 is the key to future provision of sustainable services for families and communities. If fully researched and implemented in consultation with existing services and key stakeholders this proposal may be the underpinning structure that allows for the sustainability of ECEC services in rural, regional and remote areas.

<u>Pre-school – supporting universal access</u>

RDA Wheatbelt supports Draft Finding 5.2. Funding for pre-school is important - especially where there are no early childhood education and care (ECEC) services or Playgroups and direct payment to Long day care services to support this would be welcomed. It is unclear why Pre-schools would be removed from the NQF when a consistent approach across agencies and jurisdictions will promote collaboration and integration and support transitions to school.

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

- Occasional care and its provision in the Wheatbelt is a challenge and addressing the recommendations identified would have an immediate positive impact. A Nationally consistent approach would end most of the uncertainty that is a key barrier to the provision of much needed services in the Wheatbelt. Utilising existing community Infrastructure for provision of Children's Services is a key theme and there are currently opportunities due to the Year 7 change to High school that may support a greater role for state education (8.2). We have existing examples in the Wheatbelt. Whilst we cannot state that Schools should be responsible for these services it would seem that they are best placed to assist or oversee these services especially in smaller rural areas where Primary Schools are often the final remaining government supported service. Provision of out of school care would enhance the sustainability of both the school and community by providing support for families to continue to work without the additional burden to community of needing to manage and maintain services that they themselves require.
- The removal of Fringe Benefit Tax and Payroll tax exemptions and rebates may further impact on services that are already struggling and hard to staff due to low wages. There will potentially be difficulty in services demonstrating they are unviable and the unintended consequences of this and it will be hard to measure.

Workforce participation

Workforce participation is a significant challenge for the Wheatbelt and Regional and Remote areas that must be addressed in order to support stronger regional communities and economic development.

- RDA Wheatbelt supports Recommendation 6.1. Quality Assurance processes. The regulation of ECECs
 has proven to be a major issue for Wheatbelt services and is the underlying issue that puts service
 sustainability most at risk with the additional burden of recruiting qualified staffing and providing
 training in rural and remote areas.
- Many of the issues reported are around relevancy of reporting or rules that impact on service
 provision undermine management and staff morale and portray negative messages that impact on
 the overall sector.

Quality Assurance processes and regulation of ECEC.

This has proven to be a major issue for Wheatbelt services and is currently the focus at many levels. A consistent, coordinated approach is required which our RCSP seeks to address.

- We believe that allowing services to operate with flexibility of staffing arrangements with a focus on an average of staffing levels rather than at all times would have an immediate positive impact- both at management and direct service delivery levels. This impacts across the board with viability, staffing arrangements and training.
- In the Wheatbelt, Local Governments are by default major providers of both Management support and Infrastructure. They are well positioned to continue this with the absence of any other options however this must be recognised and the additional support and funding be provided. Innovative solutions are possible but require highlighting, support and additional funding

Ongoing support for evaluation and program assessment

RDA Wheatbelt supports the need for ongoing evaluation and program assessment and a review process. The AEDC has been of assistance in providing a focus for local communities and a strong evidence base to support targeted outcomes.

The Productive Commissions Report is acknowledged as a major component of the Wheatbelt Regional Children's Services Plan, in communicating future changes and creating opportunities for innovation and improving the sustainability of the ECECs and overall Children's Services regionally.

The WRCSP is due to be completed in late October 2014 and RDA Wheatbelt would be happy to provide a copy to the Productive Commission for their consideration.