



COMMUNITY CHILD CARE CO-OPERATIVE

LTD. (NSW)

ABN 81 174 903 921

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Early Childhood Development Workforce Study

Productivity Commission

LB2 Collins Street East

Melbourne Vic 8003

Please find below Community Child Care Co-op's submission to the Productivity Commission's

Draft Research Report on the Early Childhood Development Workforce.

Thank you for the opportunity to comment on your draft report.

Yours faithfully,

Leanne Gibbs

CEO

Community Child Care Co-operative

Community Child Care Co-operative (NSW) was established in 1978 and is a not-for-profit organisation that promotes, supports and advocates for quality children's services; meeting the needs of children, their families and the community.

Community Child Care Co-operative NSW has a variety of roles in the NSW children's services sector which leave us uniquely placed to provide this submission.

We are:

- a peak organisation in NSW representing over 1300 children's services, families and individuals. Although Community Child Care Co-operative represents services in all areas of the children's services sector, our full members are community based long day care services and community based preschools. Our submission thus predominantly reflects the interests of these two groups. Between 1991 and 2001 the number of places in privately owned for-profit long day care services (a significant proportion of which were owned by corporations) increased by almost 400 per cent compared to only 55 per cent in not-for-profit services. Currently less than 35% of early childhood services in NSW are community based. As our work has its focus in the early education and care workforce, we are confining our comments to this sub sector of the Early Childhood Development workforce.
- A Registered Training Organisation offering a variety of nationally accredited VET courses to children's services in NSW and their employees. We also deliver distance education to employees engaged undertaking traineeships in children's services across NSW.
- The lead agency of Children's Services Central, the Professional Support Co-ordinator in NSW. This program, funded by the Australian Government, under the Inclusion and Professional Support Program, provides a range of professional development to all Australian Government Approved Child Care Services in NSW. As the provider of the majority of professional development and in-service training course to the majority of the early education and care workforce in NSW we are uniquely placed to comment on issues relating to the ongoing professional development needs and efficacy of pre-service education for the children's services workforce.
- A well respected advocacy organisation for children's services in NSW

CCCC endeavours to:

- provide leadership which empowers the decision makers within children's services;
- identify service provision gaps and needs, and proactively target resources to these areas;
- support and collaborate with other children's services providers who reflect similar philosophical beliefs;
- embrace the value of difference and debate; and
- be a role model for best practice in corporate governance and organisational operation.

Preamble

Community Child Care believes that in essence the draft recommendations and findings of the Productivity Commission are welcome and accurate and if implemented would lead to improvements for the early childhood education and care workforce and the early childhood education and care services that are employing this workforce.

There are a few of the Commission's findings that we believe should be converted into specific recommendations and a few recommendations that we believe could be strengthened.

Comment

Chapter 3 – Government Involvement in the early childhood development sector.

Finding #	About	CCCC response	CCCC Comment
3.1	Small additional funding = substantial benefits	Agree	
3.2	Reg system needed for quality improvement	Agree	

Recom #	About	CCCC response	CCCC Comment
3.1	Service quality should be published	Agree	
3.2	Adequate financial support for low income families	Agree	This is especially true for NSW community based preschools. Totally dependent on State government funding and fee income, the costs of the National Quality Framework will fall directly on low income families unless there is an increase in funding to allow preschools to meet the National Quality Standard without

			increasing fees to do so. Whereas previous funding systems enabled fee relief to be awarded to such families, the current differential between per child subsidies for low income families and that provided for other families under the current Resource Allocation Model of preschool funding by the NSW State Government, makes preschool substantially unaffordable for low income families in NSW. This will be exacerbated by compliance costs in meeting the National Quality Standard.
3.3	Waivers should be published	Agree	This is especially true for waivers relating to staffing issues such as employment of qualified early childhood teachers. One of the main aims of COAG in establishing the National Quality Agenda was increasing the qualifications levels of educators. This intent can be seriously undermined by the granting of waivers. Publication of these would act as a further incentive for services to employ the staff required under regulations, rather than resorting to a waiver application.
3.4	Consultation with Stakeholders	Agree	
3.5	Management support needed for community based services	Agree	See comment below
3.6	Training for regulatory staff	Agree	

Additional Comments on Chapter 3

- The Productivity Commission notes in Chapter 3.1 that the Australian Government is responsible for the majority of funding in the early childhood development sector. Community Child Care believes it is important to note that funding of preschools is enshrined in legislation as a State and Territory Government responsibility as opposed to funding of “child care services” which is an Australian Government responsibility. This is a particular issue in NSW where the chronic underfunding of NSW preschools by the NSW State Government has had unique workforce implications for ECEC staff employed by

state funded preschools. It is also an important distinction to make because for the first time state and territory funded preschools and kindergartens will be subject to quality assurance processes through the National Quality Framework, without, in the case of NSW services any additional financial support from the Australian or NSW State Governments.

- Likewise in section 3.4 of this chapter, the Draft Report states that parents may have to pay 50% of the additional costs imposed by the NQA. It is important to note that families using state funded preschools as their early education and care service are not eligible to claim under the Child Care Rebate. The Child Care Rebate is only available to parents who are using services approved under Child Care Benefit. State funded services are thus excluded.
- CCCC endorses recommendation 3.5 regarding the need for professional management support for volunteer committees. We believe it is important to note that far from being “inexpert volunteer management committees” some management committees consist of parents who, through their professional lives bring high level skills to the task of voluntary service management. Community based managed services are services that run on a not for profit basis with any surplus reinvested into the service. Research shows that such services generally have higher staff to child ratios (an indicator of quality), are more inclusive of children with additional needs, and have higher enrolments of the more expensive to care for age group – babies under 2. There are two major types of community-based not-for-profit services:
 - Stand alone, where the service is managed by a committee comprising parents and community members. The licensee of the service is the incorporated body, represented by the management committee which is elected each year. The committee makes all major legal, financial, employment, planning and policy making decisions. The service is usually incorporated as a company limited by guarantee, an association or a co-operative.
 - Sponsored, where a number of services are managed by an organisation, sometimes with advisory committees comprised of parents and community members. The licensee is the sponsor body which makes all major legal, financial, employment, planning and policy making decisions and is guided by the elected advisory committees. Examples of sponsor bodies include large providers (such as KU Children’s Services in NSW) and local councils.
- The beauty of community-based children’s services is that they are generally managed by the parents whose children are attending the service at that time, which emphasises the community investment in the service. Although there is no doubt that services are finding the increased regulatory environment difficult to manage, this is only a reason to give assistance in areas such as administration and compliance, not a reason to question the efficacy of the community based model. The rapid pace of change over the last few years, especially in areas such as employment (WorkChoices and Modern Awards) and compliance (children’s services regulations, occupational health and safety etc) has exacerbated the issue. After the implementation of the National Quality Framework, with its longer term goal of reducing regulatory compliance, Community Child Care believes that the rate of change in the sector will slow to a more manageable rate which community based committees will once again be able to deal with.
- The Productivity Commission may also wish to consider the impact on ECEC staff working for community based services of rapid sector change. Directors and Co-ordinators often

report that it falls on them to increase the resourcing and support they provide their employer, the management committee, in such periods. To the best of Community Child Care's knowledge there has never been research undertaken as to the appropriate level of administrative support or release time for teaching directors in community based services of different sizes. Hence you may find relatively small services with non-teaching directors and conversely large services where the teaching director gets only a few hours release from face to face to administer a service. A recommendation for research to be conducted in this area could lead to standardised formulas for release and administration assistance being developed. This could in turn, assist in reducing workplace stress.

Chapter 4 – The early childhood education and care workforce

- The Draft Report refers to the ECEC “wage puzzle”. CCCC would like to offer another reason as to why ECEC wages are “‘sticky’ at award levels”. We believe that most community based employers genuinely believe that their staff deserve higher wages than what they currently receive. The only two methods of funding increased wages are through increased government funding or increasing parent fees. Parent run committees are understandably reluctant to increase fees and there has been no substantive increases in government funding of the majority of community based ECEC services for a number of years. Community based services cannot therefore afford to increase wages. If they did, for profit services would need to increase the wages they offer in order to increase their potential to recruit and retain staff. In the absence of above award community based wages, for profit services have little or no incentive to increase their wages, hence the entire sector continues with below average wages. A relatively small funding increase by Australian and state and territory governments tied to increased wage rates, would have a large effect on wages across the sector. CCCC would like to see a recommendation from the Productivity Commission on this issue.
- The Draft Report refers to the declining role of volunteers in the ECEC workforce. CCCC would like to point out that there is no replacement of parent-run community boards by cluster managers in NSW. Cluster management is only possible in states and territories where this process is funded by the state or territory government. In NSW there is no funding to allow this to occur, so the rate of parent run community management has not changed in the last decade or so.

Chapter 5 – The preschool and long day care workforce.

Finding #	About	CCCC response	CCCC Comment
5.1	Community managed preschools in NSW will need to offer pay parity with LDCS and primary	Agree	This finding must be converted to a specific recommendation if it is to have the effect of alerting the NSW State Government to the need to act on this issue. If the Productivity Commission is not able to recommend on areas outside of those relevant to the Australian Government a recommendation that the Australian Government discuss this issue with their state counterparts would still heighten

	teachers		the strength of this finding.
5.2	Wages will have to increase for Cert III and Diploma staff.	Agree	This finding must also be converted to a specific recommendation. Without additional funding, services especially community based services will be unable to afford increased wages.

Recom #	About	CCCC response	CCCC Comment
5.1	3YT should be able to deliver preschool program	Agree	Generally CCCC would not agree with a recommendation that suggested reducing the qualifications required in the ECEC sector, yet the 2010 Workforce Census showed that a bit more than half of the degrees held by preschool and LDC staff in NSW are 4 year degrees. The Census also showed that over a quarter of the preschool workforce is over 50 years old, with 13.2% over 55. Encouraging an ageing workforce to complete additional training is obviously problematic. Given that only around 50% have the necessary qualification to deliver the program, the requirement should be changed as a transitional measure.

Additional Comments on Chapter 5

- In section 5.1 of the Draft Report the productivity Commission notes that traditionally there has been “few teachers employed in LDC”. This is not true within NSW, where Regulations have required the employment in both LDCs and preschools above 29 licenced places. This is noted in Box 5.2, but not in section 5.1
- There is no acknowledgment in this chapter that although LDC services have persistently reported difficulty in recruiting Early Childhood Teachers, community based services have had less difficulty than for profit services. Anecdotally CCCC has come to believe that this is because of a willingness of community based services to offer improved conditions in lieu of increased wages.
- CCCC wishes to reinforce the fact that the ability of ECEC services to pass on increased labour costs to parents is higher in high income neighbourhoods. Unless a commitment is made by Governments to assist services with the costs of implementing the National Quality Agenda, we could end up with having a two tiered ECEC system, with neighbourhoods in lower socio economic areas having less well staffed services.

- Section 5.4 of the Draft Report suggests that staff in community–managed services might have employers who do not recognise the need for professional development. As the Professional Support Co-ordinator in NSW Community Child Care can report that community based children’s services have a higher take up rate for professional development than other service types.

Chapter 6 – The family day care workforce.

Finding #	About	CCCC response	CCCC Comment
6.1	Fewer children will attend FDC in NSW + other states because of cost increases.	Agree	It is important that these two findings be converted to Recommendations. Specifically, a recommendation about a longer lead in period for the altered number of children an FDC carer can care for, would help to lessen the impact on NSW FDC schemes of the new NQF requirements.
6.2	This will cause lower revenue for Co-ordination Unit staff.	Agree	

Additional Comments on Chapter 6

- There are two specific workforce issues for FDC which do not seem to have been adequately dealt with in the draft report.
- The first is the increased demand for FDC carers which will occur in NSW because of the reduction to the number of before school age children an individual carer can care for. 20 per cent less children will be able to be cared for by existing Family Day Care Carers from 2012. Currently 29,905 children under school age are cared for by FDC Carers per week in NSW (Source National ECEC Workforce Census 2010). This equates to 6000 children who will need to either be cared for by additional carers. 1500 new carers would be required.
- The second issue is the effect of the displacement of these children on other service types and their workforces. Because it would be impossible to recruit 1500 additional carers, many of these 6000 children will end up in long day care centres and preschools which will in turn increase the number of educators required in these service types.

Chapter 7 – The outside school hours care and occasional care workforces.

Finding #	About	CCCC response	CCCC Comment
7.1	CCCC makes no comment on outside school hours care as this is outside of our expertise.		
7.2	This should be no mandatory qualification requirements for OCC staff.	Disagree	The Draft Report shows a lack of understanding of brain development in young children. If 10% of children are spending more than 20 hours in OCC there clearly should not be “limited scope for educational interactions”. Neither is there “limited scope to contribute to cognitive development”. Educational interactions cannot be separated from care services and educational interactions occur from birth, not from a later age as this chapter and recommendation suggests.

Additional Comments on Chapter 7

- In NSW, Occasional Care services are regulated under the Children’s Services regulation 2004 and are, like preschools and long day care services, required to employ an early childhood teacher if they are licensed for more than 29 children. Although Occasional Care Services are currently out of scope of the NQF, Community Child Care believes they should be brought into scope as quickly as possible to ensure that they do not become regarded as second rate services. In NSW all occasional care services will continue to be licensed by the NSW Government and will continue to be required to employ a teacher.
- We believe that as some children are spending significant time in the care of Occasional Care services these services should be required to have the same mandatory qualifications as other centre based services. We reject the notion that any service type does not contribute to the cognitive development of the children who attend it.

Chapter 8 – The early childhood education and care workforce for children with additional needs.

Recom #	About	CCCC response	CCCC Comment
8.1	Inclusion programs should be better funded and administered.	Agree	The fact that the current funding structure for inclusion support workers does not cover their full wages and lends towards the employment of unqualified staff has always been an issue of concern to CCCC.
8.2	Additional funding for professional development for inclusion staff.	Agree	Staff funded under the Inclusion Support Subsidy often do not get access to professional development because they are engaged as casual workers for short periods because of the structure of Inclusion Support Subsidy.
8.3	Funding for allied health and early intervention professionals.	Agree	

Additional Comments on Chapter 8

- As the lead agency for the Professional Support Co-ordinator in NSW, Community Child Care Co-operative subcontracts the management of the Bicultural Support Program in NSW to Ethnic Child Care, Family and Community Services Co-operative. Characteristics of Bicultural Support Staff employed through this program are known.
- As at May 2011, 378 Bicultural Support Workers were registered in NSW representing 110 different cultural & linguistic backgrounds. These workers are offered a range of professional development through the program in areas such as inclusive practices, Aboriginal perspectives, occupational health and safety, the Early Years Learning Framework, child protection and behaviour management. In 2010, 21 NSW Bicultural Support Workers obtained their Certificate III in Children's Services, and a similar number will probably obtain this qualification in 2011.
- All Professional Support Co-ordinators are responsible for provision of professional development for Inclusion Support Facilitators in their state and territory. Community Child Care members have raised issues about the lack of consistent qualifications and experience of ISFs they deal with plus concerns about the high turnover of these workers. Given that

there will be, post NQF, qualifications requirements for children's services, it seems reasonable to also insist that ISFs have minimum qualification requirements by a similar time frame. CCCC believes a teaching degree would be the appropriate qualification, but understand this may not be a pragmatic requirement given the current skill set held by ISFs. To This end we would recommend something similar to the service requirements i.e. that by 2014 all ISFs must have or be studying towards a Diploma in Children's Services and additionally each ISA must employ a minimum of two ECT qualified staff.

- Community Child Care strongly believes that the low hourly rate of the Inclusion Support Subsidy and NSW SCAN subsidies means that inclusion support workers, (who, because of the importance of their work) should be highly skilled and educated, are often untrained and employed as casuals and on a part-time basis. The rate and claimable hours of the Inclusion Support Subsidy is a constant issue raised by CCCC's members. Even given fiscal restraints, the current model of wage support over limited hours means that services cannot: employ highly skilled inclusion workers; offer continuity of employment; and willingly accept children with high level inclusion needs.
- Community Child Care also supports measures to enable further professional development to be available for staff employed under inclusion subsidies.

Chapter 9 – The early childhood education and care workforce in rural and remote areas.

Recom #	About	CCCC response	CCCC Comment
9.1	Assessing existing incentives for recruitment and retention against targeted measures.	Agree	
9.2	Governments should provide housing for ECEC workers in remote communities.	Disagree	Within NSW, Community Child Care's members have not raised housing supply as an issue. A range of incentives and allowances should be offered as appropriate for individual communities.

Additional Comments on Chapter 9

- CCCC agrees with the general findings that recruitment and retention of ECEC staff in rural and remote areas is an issue that needs to be addressed.
- One of the difficulties that NSW rural and remote services face in NSW is difficulty in recruiting casual qualified teaching staff. One of the main reasons for this is that casual qualified teachers can earn significantly more money by working in primary schools than in early childhood services, so often are only prepared to fill in for teachers when there is no work available at the local primary school. Because of regulatory demands re the presence of teachers onsite, this makes it hard for early childhood teachers to attend professional development courses (or take sick leave!)
- The ongoing viability of early education and care services in rural and remote NSW is often affected by the relative wealth of the community. During times of drought for example, when farmers fee incomes go down, rural services face falling enrolments which can make it difficult to continue to employ more qualified(and therefore more expensive) staff on an ongoing basis.

Chapter 10 – Training the early childhood education and care workforce.

Finding #	About	CCCC response	CCCC Comment
10.1	Content of VET courses OK.	Agree	
10.2	CCCC has no comment on this finding.		
10.3	Career pathways are emerging	?	CCCC is uncertain whether this is in fact the case. Although there are a diverse and rich amount of jobs within the sector, these are not necessarily linked with the increased wages and status normally seen in jobs at higher levels within a career path.
10.4	RPL reduces costs of training and national assessment tool will help.	Agree	CCCC believes that full information about the RPL assessors program should be made available for rural and remote children's services staff. These staff are making decisions now about how they will obtain required qualifications, and by delaying the release of detailed information about the process until after the RPL tool has been developed, the Commonwealth Government is hindering the process.

10.5	Teaching graduates get skills and knowledge they require but access to pracs are a concern.	Agree	CCCC believes that most higher education providers within NSW are equipping ECT graduates well. We do note however that in periods of rapid sectoral change there is a strong need for higher education providers to be linked with organisations such as ours and with Professional Support Co-ordinators to ensure they are teaching and imparting knowledge around contemporary practice.
10.6	RTOs will meet increased demand for higher education quals for teachers.	Disagree	IN NSW, to the best of Community Child Care's knowledge no RTO delivers currently higher education qualifications. We believe these are best delivered from higher education institutions.
10.7	PD is important	Agree	
10.8	Online training packages etc should be explored	Agree	

Recom #	About	CCCC response	CCCC Comment
10.1	Should be minimum periods for practicums	Agree	CCCC has long been concerned about RTOs offering Certificate III courses obtainable in very short periods.
10.2	Should be VET courses targeted at CALD workers	Agree	CCCC believes that there should be research done on the completion rates of Certificate III and Diplomas in Children's Services. Anecdotal evidence suggests that the non-completion rate in NSW is incredibly high, especially through TAFE colleges and that some of this can be attributed to language issues.

10.3	CCCC has no comment on this recommendation.		
10.4	VET assessors should have current ECEC knowledge	Agree	
10.5	ASQA should ensure ECEC training is of acceptable quality.	Agree	
10.6	CCCC has no comment on this recommendation.		
10.7	ECEC quals should be considered high risk by ASQA	Agree	This is especially true because of the sheer numbers of workers who will need to access nationally recognised qualifications in the next two years. Private RTOs will market extensively to this group.
10.8	All staff should have access to PD around NQS,EYLF, inclusion, leadership and governance and working in integrated services.	Agree with some parts of recommendation.	As the lead agency for Children's Services Central, the Professional Support Co-ordinator in NSW, Community Child Care agrees with some of this recommendation. All workers should have access to professional development! To suggest that the NQS and the EYLF should have priority now is reasonable (along with the School Aged Care Framework) but CCCC does not believe that inclusion and leadership in integrated ECD services are necessarily priorities. PSCs conduct extensive professional development needs each year. In addition there are currently very few integrated ECD services in NSW.
10.9	Should not be registration scheme for non-teacher educators	Agree	

Additional Comments on Chapter 10

- Within this chapter the Commission has made a presumption (p 177) that the increased demand for teachers will mean a corresponding increase in the demand for ECT teaching degrees. CCCC believes that unless the status and standing issues for the profession (including wage levels) are addressed there is no guarantee of increased demand for degrees. Unless there is for example pay equity between ECTs and other teacher's potential students will not be attracted to ECT degrees.
- Diversity of professional development is an important issue. Although it may appear as if the majority of professional development offerings from the Professional Support Co-ordinators over recent times have been directed at the NQF and the EYLF, this is because these two frameworks touch every area of quality within children's services. When PSCs deliver professional development on either of these topics it is not just information transfer but richly layered skills acquisition designed to impact on all areas of a service's performance.
- CCCC believes there is an omission in this chapter. In NSW alone, over the next few years approximately 6700 currently untrained contact workers in preschools and LDCs will need to obtain a minimum Certificate III qualification. As an RTO working in this sector we are struggling to recruit trainers and assessors with children's services experience to RPL and train. We believe that there should be a recommendation by the Productivity Commission regarding the need for additional children's services VET Assessors and Trainers. The RPL tool that is being developed as announced in the last Commonwealth Budget has an allocation to train "600 *already-qualified* RPL assessors". Because of the low wages in the sector and the high cost of obtaining the requisite Certificate IV TAE qualification, senior and experienced sector staff who would be well placed to take on these roles cannot afford to get the necessary qualification to do so.
- CCCC would like to see a recommendation by the Productivity Commission around the translation of the Early Years Learning Framework into a range of community languages. The Draft Report speaks of equipping culturally and linguistically diverse workers to deliver the Early Years Learning Framework. Given the high numbers of CALD workers in some sub-sectors of the ECD workforce (particularly FDC) surely the first step would be the translation of the document? CCCC understands this has not been done to date because of cost considerations and there is no intention at this stage to translate it in the future.
- More ongoing professional development! CCCC considers that the Professional Support Co-ordination program has worked well in delivering professional development and resourcing to children's services staff, and management. However, an additional key issue needs to be addressed around professional development as well as the backfill issue. This is the limited number of courses that can be offered by Professional Support Co-ordinators because of funding constraints. We say this not as a PSC, but as a membership organisation – members are constantly asking for more professional development opportunities. Since the development of the NQF and the EYLF, PSCs have, of necessity delivered an increasing amount of professional development on these two areas, which in NSW, at least, has still not met the demand. As there has been no additional funding to cover the professional development needs of the sector in these two areas, this delivery has been at the expense of other areas of professional development.

Chapter 11 – Planning the ECEC workforce.

Recom #	About	CCCC response	CCCC Comment
11.1	Workforce Strategy	Agree	
11.2	CCCC has no comment.		

Additional Comments on Chapter 11

- Community Child Care is concerned at the delay in the development or release of the Early Years Development Workforce Strategy which was initially promised for 2010. Children's services across the country are scrambling now to access funding and information to ensure they can fulfil the qualifications requirements of the National Quality Framework by 2014. The lack of a cohesive strategy now is undermining the commitment of the COAG reforms to increase the qualifications of children's services staff. It is also placing additional stress on employers and employees in the sector who are uncertain whether they should be enrolling in courses now or waiting for a more structured workforce plan from governments.

Chapter 12 and 13 – Child Health Workforce and family support services workforce

CCCC has no comment on these chapters.

Chapter 14 – Workforce for Indigenous ECEC services.

Finding #	About	CCCC response	CCCC Comment
14.1	CCCC has no comment on this finding.		
14.2	Alternative models for Indigenous focused ECEC should be expanded.	Agree	
14.3	Ongoing support for Indigenous children is needed through transition	Agree	

Recom #	About	CCCC response	CCCC Comment
14.1	Indigenous services should be brought in scope of the NQF and supported to reach NQS	Agree	
14.2	ECEC services should meet cultural competency standards and ACECQA should develop Indigenous Cultural Competency Standards	Agree	
14.3	Priority of provision of ECEC for Indigenous children + multiple year funding for Indigenous ECEC services	Agree	
14.5	Staffing Indigenous services should be priority	Agree	
14.6	ECEC quals should be considered high risk by	Agree	

	ASQA		
14.7	Priority funding for Cert I and II	Agree	
14.8		Agree with some parts of recommendation.	There is no doubt that IPSUs, like PSCs require additional funding, specifically to increase the amount of professional development and support they can supply to indigenous staff. We believe that IPSUs are the best providers of general Indigenous cultural competency training to mainstream service staff. However, this training should be provided by IPSU staff/trainers through the existing PSC structure, as the PSCs co-ordinate the provision of all professional development to mainstream children's services.

Additional Comments on Chapter 14.

- Recommendation 14.3 calls on governments to give priority to the provision of quality ECEC services for Indigenous children “without passing on extra costs to parents”. Existing systems of subsidising parents for the cost of Child Care Benefit and Child Care Rebate are of such complexity that mainstream children's services and Indigenous families report this as a barrier to enrolment of indigenous children in mainstream services. The draft report states that there is around 55,000 Indigenous children under 4 in Australia. Given the closing the gap targets and given the known value of quality education and care for disadvantaged children, wouldn't it be nice to see a recommendation for free early education and care for every Indigenous child in an Indigenous or mainstream service of the families choice?

Chapter 15 – The integrated ECD services workforce.

CCCC has no comment on the majority of the draft recommendations in this chapter, with the exception of Recommendation 15.4 regarding expanding the scope of the Professional Support program to include access to professional development for workers in non-ECEC components of integrated ECD services. CCCC does not believe that Professional Support Co-ordinators, as currently structured, have the funding or skills to provide professional development for non ECEC workers at this stage.