

Hume City Council Submission

Response to Productivity Commission's Draft Research Report: Early Childhood Development Workforce

Background to Submission

Hume City Council is pleased to have the opportunity to provide a submission to the Productivity Commission's Draft Research Report into the Early Childhood Development Workforce. Council welcomes the national reforms that were agreed by COAG in 2009 and as a major provider of early years services is well-placed to provide a response to the Productivity Commission's Inquiry.

Hume City Council is responding to the Draft Research Report in its capacity as a planner and provider of early childhood education and care services in Hume City. Council is responding to Draft Recommendations in Chapter 3, Chapter 7, Chapter 8, Chapter 12 and Chapter 15 and is providing further information about the workforce mentioned in these chapters.

Hume City Context

Hume City, home to more than 172,000 residents¹, is based in northern Metropolitan Melbourne and incorporates the major population centres of Broadmeadows, Craigieburn and Sunbury. Hume City is one of the fastest growing municipalities in Victoria and has a substantial proportion of children and vulnerable families.

In 2006, there were nearly 23,000 families with dependents. This household type is expected to be the fastest growing household type in Hume City. Between 2006 and 2021, it is expected that the number of families with dependents will increase by more than 8,000 families. A further 13,000 families are expected to be living in Hume by the year 2036. The ability to adequately provide for the early learning and education needs of these families and children is a critical factor in ensuring a healthy, educated and economically strong community into the future.²

Table 1: Number of children 0-5 over 25-year period ³

Age of child	2011	2016	2021	2026	2031	2036
0	2,803	3,055	3,422	3,901	4,414	4,923
1	2,770	3,036	3,399	3,875	4,388	4,899
2	2,731	3,017	3,375	3,852	4,362	4,871
3	2,760	3,016	3,384	3,848	4,360	4,870
4	2,679	3,005	3,378	3,829	4,339	4,846
5	2,572	2,994	3,369	3,814	4,321	4,828
Grand Total	16,315	18,123	20,327	23,119	26,184	29,237

For children under the age of five, who are the largest group in the early childhood sector, the numbers will increase dramatically over the next few years. See Table 1 above for an indication of the increase in population expected in Hume City between 2011 and 2036. In most age groups of 0-5 years, the population will more than double by the year 2036. In the next five years, the number of children under the age

¹ ABS, Estimated Residential Population 30 June 2010

² Id Consultants, Hume City Population Forecasts, 2006-2031 (updated 27 July 2011)

³ Id Consultants, Hume City Population Forecasts, 2006-2031 (updated 27 July 2011)

of five will increase by nearly 2,000. The impact of this increase in population on early childhood service provision in Hume City is significant.⁴

In addition to the growing population of children and families, Hume City is home to a large number of vulnerable families on low incomes, families from Culturally and Linguistically Diverse (CALD) backgrounds, families and children with disabilities, and a significant Indigenous population. For a range of social, economic and cultural reasons, these community groups are often disadvantaged in their ability to access early learning services. The situation is highlighted in the following data:

1. According to the Socio-Economic Indexes for Areas (SEIFA), Hume City is the fifth most disadvantaged Local Government Authority in Victoria.
2. Also according to the SEIFA Index, the Broadmeadows Statistical Local Area is the most disadvantaged area out of 79 Victorian metropolitan SLAs.
3. In the 2006 Census, more than 6,000 people in Hume City identified themselves as requiring assistance with a core activity, which is a key indicator of people experiencing disability.⁵
4. Hume City is home to more than 36,000 people from CALD backgrounds, with approximately 1,200 migrants and refugees arriving every year.⁶
5. More than 29.3% of Hume City residents were born overseas, with 36.2% residents speaking a language other than English at home.⁷
6. In 2006 according to the ABS, there were 892 Aboriginal and Torres Strait Islander people living in Hume City. This represents 0.6% of the total population for the LGA, which is higher than Metropolitan Melbourne (0.39%).⁸

Key points in Council's response

Council is pleased with many of the recommendations in the Productivity Commission's Draft Research Report and believes these measures will greatly assist local government, community and private ECEC services to adjust to the reforms. Hume City Council is providing feedback, comment and further information about five sections of the ECEC workforce and is concerned about a number of the Draft Recommendations. Council's response focuses on the following key points:

1. Council reinforces that there is urgent need to increase assistance for low-income families to access Early Childhood Education and Care services in order to reduce barriers to participation.
2. Council affirms the value of and need for minimum qualifications for staff in Occasional Care and Out of School Hours services and believes these qualifications should be aligned to other ECEC staff to enable career pathways and flexibility of the workforce. Council reiterates the value of viewing OC and OSH as services that provide education in addition to care.
3. Although the reforms are significant and require a range of measures and additional funding from local governments to respond to the requirements, Hume City Council has undertaken a range of measures to ensure all staff are sufficiently qualified by the target date.
4. Council provides support for an integrated workforce and highlights the value of all ECEC staff having the same minimum competencies and the same skill set, as well as being covered by the same funding structure.

⁴ Id Consultants, Hume City Population Forecasts, 2006-2031 (updated 27 July 2011)

⁵ ABS, 2006 Census of Population and Housing

⁶ ABS, 2006 Census of Population and Housing

⁷ ABS, 2006 Census of Population and Housing

⁸ ABS, 2006 Census of Population and Housing

5. Further details and support are provided in relation to the management and development of integrated early learning centres, including the need for additional capital from Government to enable new centres to be built or to retrofit existing facilities. Council also advises there is a need to investigate prescriptions within the Award, which reduces the capacity for staff to engage in collaboration and integrated service delivery.
6. Council provides information about the Inclusion Support Facilitators and Preschool Field Officers and reiterates the crucial role these staff play in enabling children with additional needs to access ECEC services.
7. Council strongly advocates for the value of midwifery qualifications for Maternal and Child Health Nurses and outlines the additional level of support these qualifications provide for families, especially vulnerable mothers.

1. Further financial assistance for low-income families

Council supports the Productivity Commission's Draft Recommendation 3.2, which states 'governments will need to ensure that there is adequate financial support for (low-income) families'. The Productivity Commission has identified a key issue Hume City Council is already grappling with – ensuring all families have fair and equal access to ECEC. Low-income families will be hard-pressed if an increase in fees occurs without further financial assistance from government subsidies. The current proposals do not provide sufficient support for local government and could mean that the most vulnerable children are unable to access ECEC services.

Currently, low-income families can access a fee subsidy for Preschool Services. However, there is no similar subsidy for other education and care programs including childcare and OSH, as the Commonwealth Child Care Benefit and priority of access are targeted at working families. Low-income families would benefit from having subsidised access to the full range of care and education services to ensure early and consistent engagement in these programs.

It is also important to ensure the subsidy remains a full-fee subsidy as it is currently designed; as such, it will need to be substantially increased to cover greater costs of service provision. There is currently no financial support for families accessing Occasional Care and the removal of the State and Federal Government operational subsidy is a major issue of affordability for families and consequently may impact the viability of service continuity.

2. Value of OC and OSH workforce and minimum qualifications

Council does not support Draft Recommendations 7.1 and 7.2 and is concerned that the Productivity Commission is questioning the need for mandatory requirements for staff working in Out of School Hours (OSH) and Occasional Care (OC). Council is concerned that this recommendation could lead to a reduction in quality and standards at many OSH and OC services.

In addition, Council does not support the statement on page XXIX of the Overview that 'ECEC employers ... want staff that are able to meet flexible working arrangements, rather than staff with children's services qualifications'. While the ability to meet flexible working arrangements is important for these services, Hume City Council believes minimum qualifications for all early childhood staff are vital for an integrated, robust and flexible ECEC workforce.

The value of qualifications is not only demonstrated by the employee's capacity to contribute to the 'cognitive development' of children, as the Productivity Commission asserts in Chapter 7. Minimum qualifications ensure all staff have the same minimum competencies to fulfil the inherent requirements of any early childhood role.

Qualifications provide rigorous and in-depth training that ensure all staff are able to respond to a range of issues and workplace factors inherent in the ECEC sector including:

- health and safety of children and their environment;
- working with children and families;
- supporting children with additional needs;
- dealing with challenging behaviour;
- responding appropriately when children are involved in protective custody;
- administration and documentation;
- risk management;
- recognising and responding to family support issues; and
- curriculum planning and implementation.

Early childhood development qualifications enhance these attributes and provide pathways for staff into other services within the sector, adding to job satisfaction and increasing professionalism. Education and employment pathways provide a pool of suitable candidates to increase staffing in early learning centres. Anecdotal evidence suggests that parents highly value staff having qualifications and gain greater confidence in the service and its employees if they know staff have specific qualifications in early childhood education and care.

Early years learning can occur anywhere and at any time. This is one of the key messages in the government reforms and should not be diluted by removing expectations of best practice and high standards of staff and services.

Further information about Out of School Hours Services (OSH):

Out of School Hours services include Before and After School Care, which operates during public school terms, and Vacation Care, which operates during public school holidays. Hume City Council operates six Vacation Care programs and four Before and After School Care programs. Approximately 330 children are engaged through Council's Before and After School programs each week. In addition, primary schools operate a further 11 Before and After School Care programs, with private providers operating three programs.

There is a misnomer that Out of School Hours is only about 'care'. Council believes the best OSH services provide social, educational, recreational and developmental opportunities for children. For many years, Hume City Council has referred to the service as 'Out of School Hours Service', not 'care', in recognition of the role these staff play in supporting the education, development and wellbeing of children.

Some children attend OSH services for 25 to 30 hours per week if families need to access both After School and Before School care. While the type of learning children receive in OSH differs from the education they receive at school, there is a very real learning and developmental component to OSH that cannot be ignored.

Further information about Occasional Care (OC):

There seems to be an assumption that because Occasional Care is accessed on an 'as-needs' basis, it is therefore not involved in providing education to children. This is simply not the case for many families, especially for those who have limited options of early childhood education and care due to financial constraints. OC is more accessible for families on low incomes as it does not require long-term or ongoing financial commitment and through OC many children come into contact with ECEC services for the first time.

The nature of OC as a flexible, local service with shorter hours makes it more accessible and affordable, especially for families in crisis. Through OC, Council is able to provide cognitive and social development to children from disadvantaged backgrounds. Families who may not otherwise consider using an ECEC such as childcare or preschool have an option that meets the care needs of the family while also meeting the educational, social and developmental needs of children.

In working with vulnerable families (including parents and children with disabilities, parents with mental health or drug and alcohol issues, CALD families and Indigenous families) staff need a high level of specific training and ability to support families with complex needs. High level qualifications help ensure this and highlight the vital role these services play in the community. It is likely that some children will only access OC due to family circumstances and there is a serious risk of undermining family support by reducing or not increasing standards and staff qualifications in these services.

Council is also concerned that there is a risk of the demise of Occasional Care because it has not been included in the COAG reforms. Without financial support for the service, there is a risk that families' access to ECEC will be diminished. This is a major concern for disadvantaged areas, including rural townships, as OC often fills a gap where no other ECEC services are available.

3. Council's success in responding to the reform agenda

Council is committed to providing a high level of quality across all its ECEC services (Long Day Care, Preschool, 3-year-old programs, Occasional Care, Out of School Hours, and Vacation Care). Council's high standard of service delivery was a contributing factor in the Australian Government's decision to trial the National Early Years Framework in one of Hume City Council's early childhood centres throughout 2009 and the National Quality Standards in 2010.

Council sees great capacity for the National Quality Standards and the Early Years Learning Framework to increase quality care and education for children across all ECEC services (including OC and OSH). Council has undertaken a range of measures to implement the frameworks and the COAG reforms, many of which are listed below:

- Hume City Council has been proactive in planning for the future and identifying the resources required to ensure the organisation is able to meet the requirements.
- Council identified in advance the extra staff that would be required by January 2012 in order to meet the regulations and reforms. Provision for these staff was included in the budget at the start of 2011 and they are in the process of being recruited.

- Council also undertook to ensure that all ECEC staff had appropriate ECD qualifications. While this has taken a few years to achieve, it has led to strong outcomes for children across all Council ECEC services.
- As part of this process, Council committed to training staff and working with them on curriculum development and quality standards, ensuring that all staff had the skills, knowledge and capabilities required.
- The recruitment process has focused on hiring staff with qualifications and relevant experience and while there are challenges from time to time, Council has always been able to fill the roles available with trained staff.
- Council focuses on providing a top quality workplace environment in recognition that workplace conditions, environment and morale are crucial in attracting and retaining staff.
- Council pays higher than the industry Award as appropriate recognition of the role ECEC staff play and the importance of remuneration in attracting quality staff. Council recognises that adequate remuneration is crucial for recruiting and retaining a qualified ECEC workforce.
- The organisation has developed effective policies and procedures that give staff confidence and security, fostering staff development through a variety of work opportunities. These measures increase employees' capacity to move from one career path to another and reinforce the value of all staff having the same minimum qualifications.
- By becoming a major reputable stakeholder in early childhood services within the industry – at the local, state and national level – Council is able to attract quality staff with appropriate levels of qualification. This has been a deliberate approach to ensure Hume City Council's high standards and quality contribute to a strong, resilient early childhood workforce.
- Council has also fostered excellent relationships with other early years providers in Hume City through the Hume Early Years Partnership and other networks, which further reinforce the quality services Council provides to the community.

To achieve the above measures, Council has invested a significant amount of its own resources. This investment is one that many other providers will either choose not to make or will not have the capacity to. All of these attributes have had an important and profound impact on staff and their capacity to deliver high quality programs and improved outcomes for children. This level of investment is unlikely to be sustainable and must be addressed by the responsible Government.

4. The value of an integrated sector and workforce

Council agrees with the below statement, provided by the Municipal Association of Victoria (MAV), in its first submission to the Productivity Commission Inquiry into the Early Childhood Development Workforce:

'From a local government perspective the current structure of the ECD workforce provides a significant barrier to the efficient and effective provision of services. The structure of the ECD workforce needs to be reviewed to develop a common philosophy focusing on competencies required for the ECD workforce with clear pathways for career progression, attainment of qualifications and leadership and management skills.

'The MAV suggests that consideration be given to the ECD workforce being examined from a national perspective as a more homogenous workforce and

that a model for a single ECD workforce is developed using the concept of core and universal competencies.'

The approach taken by governments in establishing the reforms is to focus on maximising every opportunity to educate and provide early learning opportunities for all children. The regulations and reforms are about changing the focus of the ECEC industry and the community perception of early years services and employees. By creating different qualification requirements for different parts of the sector, there is a risk of undermining the strength of the industry as a whole and potentially creating division between the different services.

As part of an integrated ECEC sector, OSH and OC are crucial to support families to continue working and providing educational and learning opportunities for children of all ages. There is a risk of devaluing the overall industry by separating OC and OSH into a 'non-cognitive development' basket. This proposal, were it to be adopted, also reduces the capacity of staff to be mobile within the industry and limits the learning between services.

A major advantage of the reforms is that all people who work in the industry come under one set of expectations to ensure overall quality. This will contribute to a more robust, mobile and flexible workforce that can be deployed in different services as required. A more integrated workforce will improve the service system for families and reduce confusion.

For this to occur, the different funding arrangements of the different services need to be addressed as a key barrier to integration. In order to provide a more streamlined, cohesive service system for families, Council believes it is important to bring all ECEC staff under the one system in terms of funding, qualifications and standards.

There are many benefits for the community in having an integrated service sector with clear and simple funding sources – the current system is confusing to navigate and is not equitable in the application of funding across all service types. Having different benefits for different services leads to confusion and runs the risk of devaluing those services that do not have child care benefits linked to them. Parents will also have a greater confidence in the sector, knowing that regardless of their circumstances and the choices they make, their child/ren will receive high quality education and care.

Just because something is hard, takes time and money, and will create challenges for staff, this is not a reason to reduce expectations of staff and services or the responsibility the industry has to educate children. The reforms indicate that every single person who works with children in this industry is responsible for the care and education of each child. These staff must be supported, empowered and held accountable for their contribution, through adequate financial support and remuneration, rigorous application of high-level skills and qualifications, and opportunities to develop and build on their skills and qualifications.

The reforms are also about raising the level of awareness about the ECEC sector and its workforce. It is vital that the ECEC sector achieves recognition for the educational services it provides, in order to achieve a greater level of community understanding and acknowledgement of the importance of educating children from birth. ECEC services have an opportunity to lead the way for the community and act as best practice role models for the community.

The above comments are particularly valid when considering the development and implementation of integrated early childhood development centres, as identified by the Productivity Commission in its Draft Research Report.

5. Integrated early childhood development centres

Council is pleased to read the Productivity Commission's acknowledgement of the value of integrated service delivery centres:

‘...the development of integrated early childhood development centres provides new opportunities for improved service delivery, but may require additional leadership and cross-disciplinary professional development for staff’.

Council is consistently working towards development of integrated early childhood centres as the most effective and efficient model of service delivery. However, a key challenge for employing this model of service delivery is that the staff qualifications, skills and experience required to operate and manage an integrated early childhood centre successfully are quite different from traditional early childhood skills. An integration leader must have skills, experience and qualifications in community development, capacity building, staff and facility management, and also needs to have wide ranging knowledge and experience about all the different ECEC services.

Early childhood centres such as Council's new Craigieburn Child and Family Centre make better use of available resources and provide a range of services at the one venue for children and families, including Maternal and Child Health, Preschool, playgroups and Occasional Care. These centres increase integration between all services, leading to improved opportunities to respond to the broad range of needs faced by children and families. The centres, by their very nature, also provide multiple pathways for children and families to engage in early learning and for service providers to provide referrals to different services. This is reflected in the concept of 'no wrong doorway' that is part of the ECEC sector – an integrated service sector can support children through myriad ways, regardless of their first point of contact.

However, for these centres to operate successfully there is additional need for support and funding for staff and infrastructure. These centres ideally have a range of community spaces available for use by families and residents. They are most effectively serviced through employing additional 'front of house' staff to facilitate use of the centre, organise community engagement events and activities, be a point of contact for residents, and ensure the smooth functioning of the centre and services.

A further barrier to implementing the integrated service model, whether at a single service centre or a multipurpose centre, is the different industrial Awards that govern the various professionals working in the ECEC sector. This is a major issue that warrants further investigation and needs to be addressed if the Australian Government is going to deliver truly integrated services. Award conditions are restrictive and don't provide opportunities for staff to plan or work collaboratively with other services. As 'non-contact' hours are reduced across the ECEC sector, there are fewer opportunities to work together and integrate between services. The current Award prescription for contact teaching and preparation limits opportunities for collaboration with other early childhood professionals.

A major barrier to the development of integrated service centres is the current infrastructure, which is not suited to multipurpose integrated service delivery. Integrated services are a great way of addressing service needs but the vast majority of current facilities are built for single service delivery and cannot support multiple services. Alterations are often out of the question for most service providers because of the cost and funding of the required structural changes.

Investment from the Australian and State Governments in new or remodelled infrastructure is crucial to support local government to provide integrated service delivery. Retrofitting, renovating or developing infrastructure to house high-level service delivery would be seen as additional, untenable costs on top of the costs of attracting more staff at a higher qualification level. For Hume City Council, the new Craigieburn Child and Family Centre, in one of Melbourne's fastest growing suburbs, would not have been possible without substantial funding of \$1.6 million from the Australian Government (DEEWR) and \$1.4 million from the Victorian Government (DEECD). It cannot be left to local government to provide the funding for these integrated service delivery centres.

One solution, offered in this submission, is that the Australian Government could identify a 10-year Capital Works program for the development of integrated early childhood centres. The monies would be allocated through a rolling program of funds, similar to the way in which local governments allocate funding to Capital Works programs in their municipality. This is a planned approach to funding crucial infrastructure needs and would increase the capacity of local governments to plan for and deliver integrated early learning centres in their communities in a timely manner.

6. ECEC workforce for children with additional needs

Council endorses the Productivity Commission's Draft Recommendations 8.1, 8.2 and 8.3 as these recommendations seek to improve access for children with additional needs to ECEC services. It is crucial that the work of staff supporting children with additional needs is expanded and supported through government policy, funding and training.

These recommendations demonstrate a strong commitment from the Productivity Commission to provide adequate funding and resources for services that support children with additional needs. The recommendations also indicate that the Productivity Commission has recognised the significant impact on ECEC services of providing care and education for children with additional needs. Council believes these recommendations are crucial for the successful inclusion of children with additional needs in early learning and education.

Council supports the Productivity Commission's Draft Recommendation 10.8 which states:

"Governments should ensure that all workers in ECEC services have access to professional development and support options. Priority should be given to enabling workers to participate in professional development that will assist them to... include children with disabilities and children from culturally and linguistically diverse backgrounds in ECEC services..."

Furthermore, Council believes it is vital that all ECD training courses provide skills and knowledge for all ECEC staff in supporting children with additional needs.

Training should be embedded across all ECD courses to ensure all staff have the appropriate skills for supporting and educating children with additional needs.

Council is funded to provide 1.8 EFT Inclusion Support Facilitators (ISFs) and 1.6 EFT Preschool Support Field Officers (PSFOs). PSFOs work closely with families and are able to support undiagnosed children whereas ISFs work with services that support children with additional needs. (See Appendix 1 for details about the ISF and PSFO roles at Hume City Council.) Both services have significant waiting lists and growing workloads. There is an urgent need for the Australian and Victorian Government to allocate more funding for these positions.

There is also an urgent need for more early intervention services, which provide much-needed developmental support to children before they enter the ECEC sector. Additional early intervention services will assist ECEC services to proactively respond to the identified needs of children. There is a long wait for early intervention services, often more than 18 months. This is too long to wait, especially considering the value of early intervention is most significant before a child enters preschool.

Early intervention is a crucial step in securing funding for a child with additional needs in ECEC and later to have services in place to support a child once in primary school. If a child's needs are not identified in ECEC, it can be one to two years before additional supports are provided in a primary school setting due to funding allocation timeframes.

Without early intervention and early diagnosis, ECEC services are often placed in a difficult situation where they are required to support children with additional needs, without the additional resources and staffing the funding can provide.

Council also believes it is vital that families have access to a range of pathways into early intervention services, including referrals from Maternal and Child Health, GPs and paediatricians. MCH Nurses often identify developmental or speech delays at the three-year-old checks. The value of three-year-old MCH assessments needs to be promoted and reinforced across all services. It is also important to increase the responsibility for assessments and early diagnosis across the whole medical field, including GPs and paediatricians.

6.1 Further information about the Preschool Field Officer (PSFO) role:

The PSFO role supports children with additional needs and their families. The aim of the role is to support children who have not yet received early intervention – these are children who have either not yet been diagnosed or who haven't been referred to early intervention services. As such, when they enter preschool they are often untreated for their developmental or learning delay. The children are often referred to a PSFO by preschool staff or other health professionals, and occasionally by parents. Without the role operating across all preschools, there is a risk that children enter school without diagnosis or without any early intervention.

Despite the value of the program, there are limited hours and very limited funds for this service. Council is funded 1.6 EFT to support at least 40 programs across the whole of Hume City. The target each year is for the PSFOs to have contact with 215 children and families for only 11 hours a year per family. For many families, this amount of support only scratches the surface and is not sufficient to respond to the multiple needs of a child with additional needs and their family.

The other complication for families is that by the time children reach preschool, it can be too late for them to receive the KISS funding (Kindergarten Inclusion Support Subsidy) they are eligible for. If children are identified and diagnosed at age three, families can receive the early intervention services, funding and respite that can resolve a range of developmental and communication issues. This assistance commences at preschool but must be identified before preschool. If funding was provided to support three-year-old programs, PSFOs would be able to have visits much earlier with children.

In addition to meeting with families and children, PSFOs must also develop resources, follow up with staff and other professionals, and follow up on health visits; these tasks alone take up a lot of time. There is an urgent need for more funds and more positions to adequately meet the needs of families and children with additional needs. Not only would it be beneficial for Council to be funded to provide more staff, the service as a whole would also benefit if Council was funded to provide 15 contact hours per year to each family, instead of just 11. Anecdotal evidence suggests that staff spend more than 11 hours with each family. It is important that this increase in hours is not matched by an increase in targets.

6.2 Further information about the Inclusion Support Facilitator (ISF) role:

ISFs provide support to services such as long day care, out of school hours services, family day care, vacation care, and in home care. ISFs become involved when a service identifies that a child with additional needs is attending the service. ISFs work directly with services and their role is to assist with the integration of children with additional needs into the service, with other children and with staff. Council is funded 1.8 EFT to provide inclusion support to 120 different services across Hume City.

Like the PSFO program, a key issue for the ISFs is the lack of early intervention services to support children's development before they enter ECEC services. Anecdotal evidence suggests that in some situations, childcare is filling the gap where early intervention waiting lists are exhausted – families are occasionally encouraged to seek alternative support through services such as childcare. In lieu of space in an early intervention service, families place their child in childcare because they are likely to receive early intervention at that service, even though this is not the ideal situation for the children and the staff. This is not a sustainable practice and creates huge demand and pressure on the ECEC sector.

Another key issue with providing adequate support to children with additional needs is the lack of options for Vacation Care. In Hume, there are no Vacation Care services for children with additional needs so families seek placements with services that are not equipped to support children with additional needs. Children coming from specialist children's schools often struggle to cope in generalist Vacation Care programs as the services are not structured specifically to support children with additional needs.

One example of an issue faced by Vacation Care programs is the suitability of venues and recreation programs. Special schools have the facilities to accommodate the complex needs of children with additional needs and they also have staff with appropriate training and experience, as well as lower staff-to-child ratios. Special schools should be supported to provide care during term breaks, with staff who are trained and experienced in supporting children with additional needs.

At the time of writing (September 2011), Hume City Council was a provider of an inclusion support program, as part of a consortium with Nillumbik and Whittlesea that won the tender to provide these services in the north outer Melbourne region. A tender process is due to commence in September/October 2011, which may see a change in the delivery of the Inclusion Support service for the Hume/Whittlesea region.

7. Value of midwifery training for Maternal and Child Health Nurses

Council disagrees with Draft Recommendation 12.3 to remove midwifery training as a requirement for Maternal and Child Health (MCH) Nurses. The Maternal and Child Health service is a quality component within the platform of early years services in Victoria and Hume City Council does not wish to see any diminution in quality of care for families. In Victoria, the service is a *Maternal* and Child Health service, not just a Child Health Service. The 'maternal' component is crucial in providing adequate support for the wide-ranging needs of a child and its mother; a child's health and early development is inseparable from the health of the mother.

The high standard of training received through midwifery training ensures high quality support and care for families, especially for families in crisis or vulnerable mothers and children. Midwifery training provides MCH Nurses with a particular level of awareness of the development of very young children and the impacts of the mother's health on her child. The training provides MCH Nurses with the capacity to recognise a range of issues faced by mothers, as well as a range of issues that can occur in the development of children.

Midwifery training provides the skills, competence and knowledge required for post-birth care, including breastfeeding, supporting the mother as she adjusts, and recognising issues such as post-natal depression. With midwifery training, MCH Nurses are better equipped to identify and respond to feeding concerns and their training enables them to offer appropriate medical support.

Closing Statements

Hume City Council supports many of the Draft Recommendations in the Productivity Commission's Draft Research Report, especially in relation to advising that more funding is required from the appropriate Australian and Victorian Government Departments for low-income families and for ECEC services for children with additional needs. Low-income families would benefit from having a full-fee subsidy that provides access to the full range of ECEC services. There is also an urgent need for more early intervention services, and to increase the range of pathways into early intervention services.

Council is also in agreement with the Productivity Commission in its statements and Draft Recommendations for additional funding and support for integrated learning centres. Integrated learning centres improve access to a range of early childhood services and are best served by an ECEC workforce that is operating as an integrated sector, with similar minimum qualifications and competencies.

Hume City Council does not support three of the Draft Recommendations in Chapters 7 and 15, which seek to reduce minimum qualifications for staff employed in Out of School Hours, Occasional Care and Maternal and Child Health services. Council is concerned these measures would result in reduced standards and quality

in these ECEC services and reduce the overall capacity for the ECEC workforce to become integrated.

Qualifications for OC and OSH staff should be aligned with other ECEC staff to enable career pathways, greater flexibility of the workforce and to support quality outcomes. Midwifery training provides the skills, competence and knowledge required for post-birth care to adequately assist and support both mother *and* baby. There is a risk of undermining the service and the level of care, education and support staff can offer mothers and children if midwifery is no longer a requirement for Maternal and Child Health Nurses.

Hume City Council supports the COAG reforms, which aim to enhance opportunities for early learning and bring about quality outcomes for families. In order to enable Council, community and private providers to offer high quality services, greater assistance is required from both Australian and State Governments to all providers to ensure ECEC services are able to attract and retain qualified staff.