



Regulatory Burdens: Social & Economic Infrastructure services
Productivity Commission
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Annual Review of Regulatory Burdens on Business: Social and Economic Infrastructure Services

Community Child Care (CCC) welcomes the opportunity to respond to the Productivity Commission's Draft Research Report. Our submission will focus on the draft recommendations in regard to child care.

CCC unequivocally welcomes a number of the draft recommendations:

Draft recommendation 3.1

The Australian Government should amend the Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Determination 2000 so that it is clear that a service can have its Child Care Benefit approval removed if it is not accredited by the National Child Care Accreditation Council.

Draft recommendation 3.2

DEEWR should improve both the quality of child care service information provided to parents, and the way it is delivered by:

- Making it mandatory for the NCAC to publish on its website information on child care services accreditation status (and the reasons for any 'not accredited' decision) and the Quality Profile Certificate (or quality rating) of specific child care services
- Publishing on its website information on those child care services that are non-compliant with CCQA, including the reasons for their non-compliance, and the consequences/outcomes that have resulted from their non-compliance
- Providing direct links to this information on the mychild.gov.au website

Draft recommendation 3.3:

The Australian Government should remove the requirement, under section 21 of the Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Determination 2000, for child care services to report anticipated vacancy information.

CCC does not agree with **Draft recommendation 3.4** regarding the removal of the requirement of the NCAC to conduct 'unannounced' validation visits of child care services but maintain unannounced spot checks. CCC believes it is essential that both

unannounced validation visits and unannounced spot checks are an ongoing requirement of the NCAC to minimise the risk of unscrupulous operators bringing in a 'quality kit' for the pre-determined day of validation to mask poor practice in order to gain accreditation.

CCC believes that it is the role of the NCAC to monitor services to ensure they are adhering to the quality standards; providing support and assistance to child care professionals to meet quality requirements is the role of the Professional Support Coordinators funded by the Commonwealth.

CCC gives conditional agreement to three further recommendations:

CCC would support **draft recommendation 3.5** – that the NCAC replace paper validation surveys given to parents with telephone surveys - on the condition that the NCAC were responsible for selecting a sample of families to call from a service and for conducting the telephone survey.

CCC is concerned by the implication of this recommendation that the validation surveys are little more than a compliance burden for services rather than a vehicle to engage families in determining the quality provided by services. Research evidence suggests that active partnership with parents is a pre-requisite of good quality care for children; therefore it is imperative that the NCAC requires child care services to demonstrate active engagement with families; tokenism is insufficient.

CCC would support **Draft Recommendation 3.6** - the integration of the three existing Child Care Quality Assurance systems - on condition that there are service specific indicators for the common overarching principles and common quality areas.

CCC would support the idea of co-ordinating compliance checks with services as suggested by **Draft Recommendation 3.7** on the condition that services are not given advance notice when checks are to occur.

Thank you for the opportunity to comment and we would be pleased to offer further information if required.

Yours faithfully

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