

## **SENATE EDUCATION, EMPLOYMENT AND WORKPLACE RELATIONS COMMITTEE - INQUIRY INTO THE PROVISION OF CHILDCARE**

SUBMISSION BY COMMUNITIES@WORK.

### **Background**

Communities@Work is a community-based, Not for Profit Company Limited by Guarantee, governed by a 9 member Board of Directors. We operate in the ACT directly delivering child care learning and education and community services to around 40% of the ACT population.

We manage 11 child care learning and education centres, 22 before and after school care programs and a Family Day Care Scheme involving some 150 self-employed, home-based carers. We are the Professional Support Coordinator for the ACT Region.

We have over 30 years experience in the establishment and management of children's services. This includes the management of an employer-sponsored centre for the Department of Finance and Deregulation, located in the Treasury Building in Parkes, ACT. Further information is available from our website: [www.commsatwork.org](http://www.commsatwork.org)

Against this background of experience, we offer the following input to the Senate Committee's Inquiry into the Provision of Childcare. Bearing in mind the comprehensive review and development effort undertaken recently on behalf of the Council of Australian Governments and the attendant substantial investigation and commentary on significant policy issues, we have confined our comment to a limited number of practical aspects.

### **Comment**

The lessons from the ABC Learning collapse are many and will continue to be analysed for some time. In our view, the central concern is to ensure that the financial aspects children's services operations are rigorously and appropriately regulated. The state of ABC Learning's financial and other documentation noted by the Minister for Education, Employment and Workplace Relations, attest to underlying problems in the sector.

In this regard, a regulation and enforcement framework should not only cover operational and safety requirements but also test the financial fitness and capacities of operators to remain viable. With regard to the not-for profit sector, the Standing Committee on Economics in their December 2008 report on Disclosure Regimes for Charities and Not-for-Profit Organisations has already made recommendations regarding the need for transparent financial reporting, and for standardised accounting and reporting.

We consider the adoption of a national approach to regulation would also facilitate planning to match needs with capacity. For example, the regulator may choose not to approve new operations in areas of oversupply and could encourage community and not-for-profit providers to establish operations in areas of identified need. Some grants or assistance with start-up costs could be provided as incentives to establish viable operations in areas of need ( as indeed already happens with respect to some before and after school care programs.)

Such an approach would also support the introduction of national curriculums and a consistent career progression structure and conditions of employment for child care professionals which would encourage greater workforce participation and mobility.

A national regulator could also address the need to provide better data management systems on a nationally consistent basis for funding considerations and processing, demographic analysis and planning to meet emerging needs and workforce planning. In our view the quality of systems currently approved by the Australian Government for use with the Child Care Management System (CCMS) could be significantly improved and more effective software and data management systems utilized.

A national regulator could provide nationally consistent licensing requirements for all children's services. For example, it could provide a consistent framework for the Out of School Hours sector across Australia which currently has a patchwork of regulatory requirements.

The use of the Child Care Quality Assurance (CCQA) system could be further enhanced and improved as part of the national regulator's role. The development of national standards is an opportunity to have one system of quality and accountability that integrates both regulatory requirements and accreditation principles. The primary considerations being that the quality improvement systems must be evidence based and appropriate for early childhood and middle childhood.

With respect to training, Registered Training Organisations (RTOs) provide quality, practical and competency focused training for the children's services sector. Communities@Work operates its own RTO to provide training for its staff and those of other operators. Hence this training can be integrated with work experience modules at our childcare facilities ensuring close and continuous mentoring of students.

RTOs should be placed on the same level playing field as TAFEs in offering training for this sector to provide more options and flexible training opportunities with greater reach into the community than otherwise possible. A decision has been made to remove fees charged by TAFEs for child care diplomas and advanced diplomas in 2009 whereas RTOs need to continue to charge full fees to remain viable. Arrangements should be made so that RTOs are not at a major disadvantage in this market through artificial fee distortions, and that students are free to gain their qualifications at an institution which best meets their needs.

We appreciate the opportunity to provide comment to the Inquiry and we would be pleased to assist further in any way the Committee may require. I can be contacted on 6293 6500 or by email: [Maureen.Cane@commsatwork.org](mailto:Maureen.Cane@commsatwork.org)

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