



Jolly Frog Private Kindergarten

August 2009

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Submission to The Early Childhood Steering Committee.

In Reference to

The Regulation Impact Statement for Early Childhood Education and Care Quality Reforms.

My name is Eileen Byrnes, I am the director and owner of the Jolly Frog Kindergarten in partnership with my husband Harley Byrnes. This submission is based on my experience in providing care and does not purport to represent any association or organisation with whom I have been affiliated in the past.

I have been the director and full time primary contact person in this centre for 34 years, before that I worked as an assistant in a small private centre in Birrong NSW. I am two year trained as a CCC ...(many years ago).

I have taken part in many short courses, approximately 80 or 90 and have delivered others as a lecturer over the past 34 years. I was president of the NSW Association of Child Care Centres for many years and have sat on various State and Federal committees. My experience with children has been in areas of special needs and with widely varied cultural groups of children, aged two to five years. Child care and education has been my major life's work (in modern jargon 'my passion'). I have enjoyed every minute!

Except for !!!

The lack of recognition and consideration of the experienced and dedicated work of long time participants in this industry I, as have others have continually striven to update my skills, however I, amongst many others am not 'four year tertiary trained' so all my years of experience, short courses completed, research done, energy, personal expense and commitment to my work are seen by the department's policy makers to count for nothing.

My anxiety is caused by this apparent attempt by government / department to disenfranchise almost all of the people working in child care services through draconian legislation that will do nothing to 'improve' the care for children but will definitely put many people out of work at a time when jobs are scarce, this legislation will as stated by the proponents, increase running costs by \$30.00 a week if as expected 'option 4' in the regulation impact statement is the chosen reform, (an incredible under estimation of the cost of the proposed changes) at a time when the economy is in a down turn.

To do this at the behest of a single academic - Collette Tayler OECD report 2006, (Ms Tayler's sad misinterpretation of the information gained from research conducted outside Australia) is nothing short of ludicrous. The conclusion that Australia's services are second worst in the world is misleading when only 12 countries participated in the 1st round and then only 8 in the 2nd round, at least six of these being small socialist regimes where provision of care and education is mostly provided by socialist governments.

In Australia expenditure on early childhood is not solely provided through government's resources, I'm wondering if the expenditure provided by the private sector was factored in the research conducted by Ms Tayler because her conclusions appear to be based solely on government expenditure per service.

This is quite misleading when one understands that 80 percent of Australian children's services are delivered by the private sector at their own cost. The government of Australia should be thankful for the private sector in that they are not footing such a large bill. My other concern is that of course Ms Tayler will advocate for Early Childhood Educators in centres exclusively, that is her job!

Has there been any research done in Australia that would support the opinion that Australia rates as 'second worst in the world'? Was the private sector's financial investment / costing included in the research on expenditure? Have parents' opinions of the care offered been evaluated? Have comparable studies shown that the diversity of care models on offer in Australia are less than the diversity in other countries proportionately? Studies done overseas relate to each country's working conditions, government programs, economic prosperity, child rearing patterns, political ideals, ethnic traditions, access to education facilities, and weather conditions dictating the provision of playing spaces outdoors.

Please let us provide facilities from research that directly relate to our own Australian expectations and ideals. It appears Ms Tayler was heavily influenced by the exclusion and / or addition of things like maternity leave, paternity leave or other social services that are not currently widely applied in Australia, these provisions do not directly reflect the quality of children's services in our country, a quality those of us actually providing care and education and the parents using care in centres across Australia believe rightly to be exemplary.

Submission.

I am at least grateful for the opportunity to present this submission, in it I intend to present positions that will reinforce why I feel that the process started needs to be fully examined and that timely consultations - well advertised in papers that parents actually read, or perhaps through television - must be taking place with the actual workers and parents who will be directly affected by policy makers or government's plans.

I am hoping the government will choose this as a golden opportunity to provide sensible, appropriate care for our children, care that doesn't send already high costs spiralling above parents' ability to pay.

I live in hope this is not just another 'tick the box' of community involvement / consultation, I hope, but do not expect that it is a true consultation and a genuine attempt to discover the needs of the children's services clients.

There is sense in regulations being made nationally acceptable and manageable, with the emphasis on both, however there are major differences in each state and the written position by government is that they do not propose to use the lowest common denominator. This could be a worry for centre management if outdoor and indoor space requirements, staff child ratios, group sizes, plus room sizes presently used in different states are factored in.

I am hoping that this time the government and policy makers will see the sense in removing all subsidies from public or private centre management and allocating CCB payments direct to families in need.

There is a grave need for caution when ideologues propose change, all change must take into consideration the fact that no state regulations appear to have caused a decline in Australian children's normal development, this challenge (impossible to achieve) would be to produce a child who has demonstrably been disaffected by the fact that he or she has attended a care centre in a specific state.

Concerns about consultations when it seems plans for change appear to be already decided.

My immediate concern is... as always seems to be the case... the lack of time given to workers in centres and parents using care in order for them to be at the consultations. Why are we always made aware of impending change so late or not given time to organise real input from those affected. It is very difficult not to be cynical about this lack of respect for the true concerns of the actual providers and users of care.

To my knowledge (and this was confirmed at the Senate hearing Friday 14th August) only three parents in NSW, one at each meeting, were able to attend, strangely there were three hundred participants at the Parramatta meeting, the majority of them were trainers, departmental staff and administrators from the public sector. At this meeting parents and actual workers in centres were not well represented, the convener asked for a show of hands to see who the participants represented and those groups most affected by the proposed changes were sadly lacking.

In this submission I will make suggestions for solutions to problems we are experiencing in the services, however in doing so I do not want policy makers to believe for one minute that I accept the premise that children's services are not already providing excellent care, nor do I accept that excellent care can only be provided by tertiary trained practitioners. I am supported in this belief by the fact that 90 percent of registered centres in Australia have been accredited, at that time those centres would have several unqualified persons working and not all qualified persons were tertiary trained. So where is the evidence that children and parents are being disadvantaged by having workers who aren't early childhood graduates providing educative care. There has been no real proof of this precept offered to children's services by the Early Childhood lobbyists. Why are policy makers so convinced that children's services are not meeting the needs of their clients, please demonstrate what difference is displayed in the abilities of a child cared for and educated by a person with a qualification not gained in a tertiary institution.

Why should such a small percentage - a minority of 20 percent only of children's services i.e. university training suppliers and their graduates, plus community based workers, be allowed to arbitrate for their own interests at such prohibitive cost to users for no sensible reason.

80 percent of Australian care is offered by the private sector, why haven't this majority of providers been properly consulted?

How can any government consider making changes that will certainly put many hundreds of workers out of work.

The costings estimated in the RIS are not a reflection of the true cost in all states nor do they include all costs in the regulation impact model ... 6.3.5 page 37.

Have the consultants taken into consideration the views of the parents using the centres, or have parents even been asked how they feel about paying added costs when costs are already higher than many can afford?

Have consultants considered that using academics as 'expert advisors' who are actually more interested in forcing children's services to supply places for their graduates, is steadily increasing costs for taxpayers.

Possible solution for inclusive consultation.

Prepare a questionnaire for parents Australia wide asking them if they feel that their centre is not providing

appropriate care at present. Would they be able or willing to pay higher costs for any proposed change, stating of course, what the actual higher cost will be.

Use the data base already compiled for NCAC by the parents using care when their centre is going through accreditation to discover what parents think about the quality on offer.

A questionnaire for staff without qualifications, would they be willing to take part in upgrading or if in fact they feel that they need to do so?

Questionnaires could be distributed through Centrelink to users, through centres, printed in newsletters or sent directly to the public as a whole - after all the public taxpayer will be the ones paying the final cost.

Promoting four year trained Early Childhood graduates unnecessarily.

Why on earth would this even be considered in the light of past results of enforcing this kind of qualification on the industry, we have discovered that as these people gain their degree they look for work in the infants or primary school sectors, they are trained as educators and that is how they see themselves.

Of course a young graduate would take the option of working in a school situation where the conditions are totally different to those in children's services. Why would a graduate work shifts in a centre - open 52 weeks per year and ten hours a day at less pay? The superannuation for teachers in schools is different, the sick pay allowance is more generous, they have ten weeks of fully paid holidays, teachers get discounts from book and toy stores, can join the teachers' credit unions and obtain lower interest rates than the rest of us, have better medical and dental schemes. They and their course administrators are elitist, they practise exclusion, making it impossible to obtain credits for past work done in other courses, they actually believe they deserve more respect from the community, the media and policy makers than other children's service workers who all perform exactly the same tasks.

Rating the performance of tertiary trained educators.... recent research shows that Quote... 'One in 14 year 9 pupils can't spell, one in 10 can't write properly, 7 percent can't spell simple words like school or building'

Sunday Telegraph 16.08 09. The article stated that this information was demonstrated by research from the National Assessment program Literacy and Numeracy - NAPLAN - a government body. The article goes on to state that the research shows that parents are the main influence on children's ability, a fact we have always understood in children's services but one that the government appears to take little account of.

The present levels of tertiary trained graduates appear to have not always helped our youngsters in schools achieve well, so why should we accept that in our centres these graduates could be the only progenitors of good outcomes? Four year olds in my centre can spell and write their own names, often names of sisters, brothers, mums and dads and even their dog's names, all without the promoted benefits of an early childhood, four year trained teacher. Interesting thought ...don't university trained teachers have to pay a HEX fee, who would be responsible for this possible cost for re training?

Possible solution for consideration.

The policy makers must accept the fact that children's services are different to schools, that exclusive use of tertiary trained graduates will be too costly for children's services and not necessary.

The government would be better employed targeting these graduates for the school system, they will surely be needed to implement the plans for the government's promise to 'prepare each four year old for school transition', in fact training these people to do what they are already intent on doing, working exclusively in schools.

Policy makers would be better served encouraging the employment of well trained TAFE graduates who have already established themselves as practical people and have worked very well in centres as supervisors, teachers and carers of 0 to 5 year olds over the years. Where is the evidence that a qualification gained at night school or part time is not as good as a qualification gained during the day?

Of course some of our services employ early childhood graduates and some directors are EC graduates also, there is no need however for this qualification to be legislated for, enforced or exclusively used, it should just be regarded as an alternative option.

Concerns about cost of change.

Change that will add massive amounts to the cost of children's services to clients for no value added.

Has any person done the actual maths for this exercise.... page 37 in the RIS states that all cost factors have not been assessed! Who will foot the eventual bill, the taxpayer or centre management and consequently the user? No one will argue that child care costs are not already beyond many parents' ability to pay, why on earth would we deliberately seek to increase this cost.

Who will work in centres whilst (or if) non qualified workers / students are obtaining the proposed qualifications? Will staff be expected to do this in their own time or their employer's time? Will management need to employ inexperienced casual workers at the consequent higher labour cost whilst staff are obtaining new qualifications? What effect will this cause for the children being cared for by these 'inexperienced workers'? It would be 'terrible', just ask an EC graduate! What an expedient and hypocritical exercise that solution would be if we were legally able to use those perceived as woefully inadequate replacements! Will staff's wages still be expected to be paid whilst staff are away from the centre being retrained? If wage and conditions parity with teachers in schools is to be introduced as some unions are promoting, who would be looking after the children in centres whilst EC qualified teacher trained staff are on ten weeks holidays? (more

of those unqualified workers I suppose)! Please, think of the practicalities.

Estimations of numbers of staff needing retraining.

How many people is it anticipated have to be retrained over the next three to four years and what is the present capacity for people currently being trained annually?

It appears that there are 12,000 children's services and 5,000 long day care providers in Australia, considering this fact how are the thousands of workers without qualifications going to obtain them?

In 12,000 children's services a conservative estimate of 48,000 people will not have so called 'appropriate qualifications' and will need to gain those qualifications over the next four years, how do the policy makers expect this will be achieved?

Has anyone considered that the present government has also promised to introduce a further 250 services and to provide 15 hours university trained, teacher / carers for each four year old in Australia before starting school.

Solution.

Proper research into the availability of courses and an accounting of the numbers of people needing retraining, including the proper costs of retraining for participants must be done before decisions are made.

Concerns staff have about lack of recognition of their experience, training and education.

Staff (and their employers) feel that there must be some recognition of years of work done and courses already completed. Are policy makers aware that many of the long term experienced workers have already completed many short courses, in many cases employers have paid for staff to complete pertinent courses during the course of their employment. It is usually part of staff's job description that they participate in training, that they hold current first aid certificates is expected through regulation, they attend in house inservice as well as numerous workshops to update skills, as well as participating in many years of practical experience.

Staff are telling us that they feel disenfranchised by the expectation that they need retraining, so much so that many are saying they won't bother and will look for work elsewhere, the perception being promoted that they haven't gained any knowledge over years is insulting, especially when they have seen the calibre of some of the students promoted as 'trained' with a 'certificate 3'. This certificate appears to be the children's service equivalent of a short 'Barista' course, fairly useless to workers in the real working world. We have been told by participating students that they 'had to do a course because Centrelink expects them to'.

Possible solution in order to retain or recruit staff.

A specific, easily accessible, two year course should be devised that covers the needs of all child care workers in a service wishing to gain a qualification, with wage levels governed by years of experience. My reason for advocating this premise is that in reality the work done in the service is the same for all members of staff no matter what the qualification a worker holds, the differences in rates of pay are a moral problem for operators when they see staff achieving the same results as the higher paid qualified staff but getting paid much less. Credits towards qualification should be given to workers for courses completed, grandfather clauses for those experienced workers considered to be already trained sufficiently by their employer, with the emphasis that already exists in expecting workers to add to their skills.

Content of courses offered at present.

Directors and course graduates also are concerned about the cost, relevance and content of some of the courses provided. We find we are employing graduates - including the much promoted EC university graduates - who arrive at a centre armed with a certificate, but no common sense or practical ability.

At the recent meeting in Parramatta an Early Childhood graduate complained that an 'Associate Diploma didn't equip graduates to write a coherent observation of a child'. In my experience of thirty six years as a carer, CCC graduate, parent and a grandmother, I have noticed that something really peculiar happens to some Early Childhood University graduates... sensory perception seems to be affected - even disappear, their noses seem to stop working... they cannot smell soiled nappies even if a child needing changing is standing next to them, their eyes don't seem to focus.... they don't notice a runny nose. They can not 'see' a dirty face, a mess on a floor that needs clearing away before someone breaks their neck, nor do they hear well....if a child is crying or importuning or even screaming they only have ears for the 'cute' or 'intelligent' child, they lack perception and are elitist, they like to chat to each other or the parents they see as 'colleagues', the more needy, challenging child or parent is left to be cared for by the 'non educated lower class worker'.

I do wonder if a parent would prefer her child care worker to have the ability to write a treatise on her child's development that only she or the writer will ever read, or would she prefer that her child be given nurturing attention at the time it is needed, by someone who has the empathy and ability to see, hear and feel for a child who just needs a nappy change, a nosed wiped or a wash and a cuddle?

To quote the COAG National Framework discussion paper 4.2 Changing community needs. 'There is a false distinction between education and care, children are indeed ready to learn wherever they are and start learning from birth'. I would like to add that 'children learn how to interact as community members when they are in a nurturing environment', that a university degree doesn't necessarily provide a graduate with the ability to teach this skill, a person cannot get a degree in nurturing, it is a skill that comes with age and experience. The wheel seems to be turning away from nurturing towards educating, the problem with this premise is the ages of the children in our care need equal serves of both. The push from academics to be recognised as 'respected professionals' (read 'highly paid') and not just 'child minders' (as if 'child minding' is something for the

lower echelons) is causing policy makers to lose sight of the fact that much of the work we do is in nurturing families and their children and nurturing is in fact a most important form of community education for children and families.

Who could believe that a young 4 year trained graduate can replace the warmth and experience of long term workers who are most often parents themselves and therefore more acutely aware of the needs of young children. Nurturing is education at its best, one doesn't obtain empathy and warmth by attending a university, nor does one need a degree to change a nappy.

Of course we are all aware that changing nappies, wiping noses or bottoms are not the only services we provide in a centre, however they are a large component of the care we offer and believe it or not this kind of care is equally as important as the developmentally appropriate art, craft, school transition, maths and language etc., activities already provided. Over qualified and very costly youngsters who see themselves as educators rather than carers are not needed. I have actually been told "I trained as an educator not a bottom wiper" by a university graduate. Graduates from tertiary institutions also resist taking part in the large amount of daily record keeping expected of centre staff by state regulations, workcover and accreditation because 'this isn't what they are trained to do'!

Possible solution.

Providers of services and parents of small children should be consulted about training needs, with the prime objective of introducing common sense into the curriculum.

Perhaps the parental questionnaire provided to centres by NCAC could be made available to policy makers and updated NCAC questionnaires could include questions to parents about what abilities they would like to see developed by the workers in centres. The resulting information could be collated for trainers to learn from and plan for.

Students of early childhood courses must also have an expectation of the amount of record keeping involved incorporated in the course curriculum so that they come to work in centres fully prepared.

Recognition and respect for the workers in children's services.

Graduates should be taught that respect and recognition is something that is usually hard earned and does not automatically come with a degree, nor is it accumulated in monetary terms, higher wages do not equate quality. In the award modernisation presently occurring, some recognition for experience must be recognised and parity of wages introduced for workers all completing the same tasks. Perhaps an award designed specifically for children's services workers would be a practical way to resolve the present disparity caused by paying qualified workers higher wages for the same work. In present day jargon - a level playing field for all.

Concerns for staff working at present if these changes are enforced.

Staff in centres are made up of qualified and non qualified people, maybe as much as (or most likely more than) two thirds are unqualified, many have years of experience in the centres, have completed many relevant courses and are experienced as parents themselves.

Some have completed a CCC, an Associate Diploma, a Diploma of Education, A Montessori Certificate, Nursing qualifications, a Certificate 3 in children's service, a two year Early Childhood degree, some have obtained certificates over two years part time, completed an equivalent course in other countries, some have infants training, or have done correspondence courses over two years, many have dedicated their working lives to children's services and have provided excellent service over the years, all will be disenfranchised by this proposed system. What will happen to these people? A quick local survey shows that most will move out of the industry.

What will be the impact on their lives, how are we to replace experienced staff with new qualified graduates when it is well understood that those with Early Childhood tertiary qualifications are already thin on the ground?

What will be the cost to present staff and then to the government if they cannot gain employment elsewhere? Will there be sufficient venues provided where workers can update skills, where and when will they be available? It is difficult for students to access courses now, let alone for centres to find graduates to employ. There will be immediate wages costs involved for centre administration if staff decide to leave, training new staff is always costly and time consuming.

Unfortunately enrolments in many centres are dropping now because of the already high cost of care, so we may be heading back to the unregistered, unregulated, uninsured care of many years ago. Centres may be forced to close for lack of enrolments and staff may lose long term positions. These very real higher costs and consequences of change is something the policy makers must consider.

Possible solution.

Credits for courses completed, credits for years of experience, recognition of commitment and work done in centres by staff by the policy makers and the sector as a whole, funding and time to complete any courses in the future should staff wish to do so and opportunities to achieve further qualifications at times and in segments they can easily access or manage. Recognition also of the fact that a graduate of a two year course from TAFE is just as pertinent to the industry as a two year graduate from a tertiary college.

If this proposal is forced upon children's services there must be a considered, gradual phasing out of non compliant staff, a granny clause perhaps, provision of funding available for those willing to enter into further training. Credits for entrance into new courses must be granted for courses completed in the past, also credits

for experience and many years spent honing skills. Considering the fact that many centre staff are mature age with children and financial commitments of their own, there should be new (more pertinent) courses offered at a reasonable cost, in incremental stages, an opportunity perhaps for staff to study in six monthly or quarterly blocks, part time or by correspondence, as incentives for achieving desired qualifications or updating previous qualifications with ease, there should be financial support from governments, state and federal, for staff in order to help them achieve this.

Discrimination against children's services.

Will individual family day care mothers be expected to gain qualifications? At a meeting in parliament - Friday 14th of August 2009 it was suggested by one group that it would be "appropriate for the coordinators of family day care units to have the four year trained Early Childhood degree"!

In my opinion it would be discrimination against centre staff if they weren't given the same option ... our advisors or inspectors could be similarly trained and we could all be like family day care mums just supervised by the supposedly more capable academics!

What about grandparent carers , friends or other family members caring for children, teacher's aids in primary schools or even teachers in public or private schools, many of our teaching profession are 2 or 3 year trained? If all other carers and teachers are not required to be four year qualified isn't this expectation of children's services staff actually a form of discrimination?

Possible solution

Policy makers could accept the fact that children's services are well used and well respected in every one of its forms by the people who need and use them, that we offer a diverse and widespread range of services all around this country and we did this as a community without interference from, or the unsolicited advice from academics who have a vested interest in providing positions for their own people. Also in all my years of service to this sector I have heard the private sector maligned, called grasping, money making, and worse by academics who do nothing but whine about how little they are being paid.

The term 'for profit' is deliberately insulting and provocative, also misleading, I would gladly change my income for that of some of the academics in children's services I have met .

I note that none of the people using that term to describe the private sector donate their services to the industry free of charge.

Every well run establishment ,private or public must make a surplus in order to pay for repairs, update and keep their service viable.

Perhaps the community based sector should be designated by the term 'funded by the taxpayers' maybe then the 'taxpayers' would expect them to be more accountable with funds that are often used in a wasteful manner. Perhaps a segment of the courses could be assigned to apprising students of the fact that private centre's owners provide their own funds to build, equip and run their centres, they take risks with their own finances in order to pursue a career in providing a service for young children and their families, the only income they receive at week's end is what is left over after commercial rents, staff wages and superannuation, commercial rates, telephone bills and other utilities, bank charges etc. are paid, many private family concerns have been or are being subsidised by the director owner's partner's income (also by family member's unpaid physical help. Perhaps we could be more politely designated as 'self funding services'.

Constant changing of qualifications by education providers.

Among concerns for our service staff are the frequent changes made to their earned qualifications that they have to cope with, a certificate or a qualification suddenly not being sufficient for a staff person to remain in a position they have worked in for many years. When students finish a course they discover that it is no longer relevant and that they are expected to 'update', only to realise that the content of the 'updated course' differs little from the one already completed. This constant unwarranted expectation must stop. It is unnecessary and is adding more stress to staff and more cost to the users.

Teachers in government schools expect to teach for many years once they have gained a teaching degree, often until retirement without returning to college, the only difference in the care and education we offer in centres to that offered in schools is the age and stage of the children we care for, why should teaching carers of smaller children have to undergo the constant updating that is expected of us.

The constant scrutiny and negative feed back we get in this industry is driving many of our best people to look for more supportive work.

Policy makers need to recognise that we already provide a system of care in this country that is second to none despite the nonsense promulgated by academics, we need recognition also of the fact that parents when surveyed are more than content with the care on offer, we are proud that staff often become defacto family members invited to family events.

Possible solution

A course specifically designed to accommodate those who choose to work with the 0 to 5 age groups, a course that remains current for longer than ten years or some other specific period, made accessible to all in the evenings or by correspondence or in achievable six monthly segments or in a part time format. A course that doesn't become just a bridge to working in the school system as is happening now.

The effect of ABC failure on the industry as per Terms of Reference Friday 14th August Senate hearing.

The demise of some of the ABC centres and the consequent blame game ensuing, has caused the hatred of the community based sector for the private sector to rise to the fore again, we have all heard the stories and we all felt sad at the disruption the parents and staff using those centres were enduring, however those ABC centres were registered and licensed by government departments, if they had exemptions granted for staff they were granted by government officials not by the private sector.

At the meeting in Parramatta we were assured by an official that there were less than a hundred exemptions granted Australia wide and that many of these were granted to remote services, not just nor even all ABC centres. In fact the ABC company's demise was caused by poor administration skill and over accumulation, also overweening ambition to move into the global field without a proper understanding of global mores. I will never understand the reason for bailing out ABC centres at the public's expense, weren't the centre's clients paying fees?

In my centre costs are met through fees paid. What if I became insolvent through mismanagement? Would this ever generous government step in to pay my debts under the guise of rescuing my clients and staff? I think not. The private sector in general is not to blame for one company's bad decisions. Nor in my opinion should the taxpayer have been expected to come to the rescue. We all regret that unwary investors lost money but surely that was a risk they took.

This constant denigration of the private sector is a problem all of us find difficult to cope with. Surely it must be obvious to all that the private sector would have collapsed long ago if the service offered was so bad. The very fact that 80 percent of services offered in Australia are private concerns belies this opinion. The only conclusion one can come to is that this malignant animosity must be caused by envy, that the critics are possessed by their own jealousies, none of them were or are willing to take on the financial risks that private carers do, nor do they have the same passion for providing a service to their chosen field that private carers have, this last statement is supported by the fact that workers move in and out of public services with amazing speed.

We have on many occasions invited the public sector into private centres. In fact the NSW Association of Child Care set up a training scheme called 'Ongoing Training In Early Childhood' that was made available to children's services as a whole, we held one day workshops at minimal cost to participants in member's centres, we did this in order to support our members and in order to liaise with the public sector. At that time this service was well used by the public sector. What a shame that hatred of the private sector has been allowed to arise to such an extent that parents are once again faced with increased costs. We all know the promoted change will do little to reduce the problems caused by poor administration in so called bad centres. We all know that there are services in both sectors that don't come up to standard. Surely a better way to support recalcitrant centres to achieve better results would be through licensing approvals being withdrawn or withheld until improvements were made or through the accreditation process. Are the public sector as enthusiastic proponents of the accreditation scheme now saying that accreditation isn't working?

Possible solution

Please let legislation reflect that centres public and private offer a service to our parents that is operating at optimum levels, this last statement is supported by the fact that all registered centres have taken part or are proceeding through the process of accreditation and 90 percent of centres judged by NCAC have been accredited.

Maybe there should be some consideration given to limiting the granting of numbers of licences to one person, perhaps with a view to limiting the size of areas able to be inspected and controlled by the owner, manager or corporation. Maybe new licences should only be granted to prospective owners in areas of demonstrated need.

Rating systems Proposal.

Like accreditation, unscrupulous managers public and private will use a rating system as a way to 'sell their centres to prospective clients' and like accreditation, ratings will do little to change the quality of care in centre managements public or private if they are not coping well. Failing centres need support not punishment.

I have of course other concerns about the management of child care services that I wish to bring to your attention.

DEERW ... CCMS.

This new system of administering subsidies is causing more headaches for service operators, subsidies take far too long to process and operators are at a loss to know whether a client is to receive a subsidy or not nor how long the subsidy will last, people on different schemes such as JET throw the system into chaos, I have received 235 emails from DEEWR CCMS help desk, at least half of those concerned 'outages'.

Since I transferred to this system I have spent many hours on the phone trying to sort out problems with CCMS management and have actually lost clients because of the problems caused by the system, my software provider has constantly had to 'upgrade' their system, 8 or 9 new discs so far. I have had to take time away from my real job ... caring for children... to visit the software provider to sort out CCMS problems.

Frequent changes to enrolments cause problems, often a client leaves a service without forewarning and then

the service has to find the client to charge them for fees where the subsidy was stopped, or as has happened often, a client gives notice and then changes his or her mind, decides to use less or more days, or different days, we look like fools to our clients when we can't explain why changes to their subsidies have occurred, clients blame centre operators for amounts of subsidies not being correct, it has increased paper work and record keeping to no advantage for operators or their clients, also has increased costs to centres.

To cap all this I was sent an email Friday 7.8.09 to say that on the 10.08.09 ... (three days later and including a weekend,) I would be fined and listing some very stiff penalties if I didn't comply with changes to reporting vacancy information. Forgive my confusion, my software is the only avenue I have for providing this information and as yet I have not received yet another new disc, does this mean that if my information sent as usual, isn't presently formatted correctly I am to blame? How am I to comply? As I have often stated I bitterly regret the advent of CCB and fervently wish it would be granted directly to the user.

At the beginning of 2009 I consulted with my clients and advised them that I believed they would be better served by asking for their subsidy as a lump sum. My clients agreed and attempted to claim this way, this caused so much controversy with my clients being told 'your director cannot give you that advice, it is against the law'! There are provisions for clients to claim this way in the hand book! We were forced by the combined insistence from Centrelink and DEEWR to continue to administer CCB through the centre with the resultant already outlined problems continuing.

How can one run a successful service with this sort of nonsense going on.

Possible solution

All of this angst about suspected or possible roting and mismanagement of government funds by children's services operators could be solved by allocating subsidies away from centres public and private and distributing them directly to the user, perhaps through Medibank, or in the form of a voucher or credit card system etc.

Accreditation.

Accreditation has become a guessing game for users, instead of using our time and efforts to work well with our children we are forced to second guess what a validator will be looking for, ending up with endless bits of paper, records, journals, folders, pamphlets, text books, policies, notices, lists, documents, posters, that become outdated and have to be redone, resourced, and reorganised regularly or we are accused of being out of date. eg. centres were originally asked to provide a philosophy of the service, then it was decided the philosophy should be in consultation with staff, then parents, then it should be dated, then it should be resourced, then it should be resourced from professionals, then it should be resourced by particular professionals, then it should have the 'proper designated titles' of those professionals recorded, then it should have pertinent quotes that are properly attributed and embedded! Whose philosophy is this?

Remember that this is just one aspect of the service paper evidence we have to provide, in our service we have approximately sixty policies composed in order to meet accreditation, each policy having to meet similar to the above stated, constantly changed, expectations. It has become a stressful exercise for all. Plus we are expected to maintain, update, resource and add to other policies required by state regulations.

Please! Give us a break! All of these paper driven activities do absolutely nothing to practically assist us in our daily work. Nor do they actually improve the quality of our work with the children.

Possible solution

This needs to be simplified and more prescriptive, if a centre is expected to provide a particular resource then we must be informed and have the access to that resource, also there must be an end to the constant change, and the duplication involved.

Accreditation must be made concise and culled in consultation with users and parents, validators must not be allowed to bring their own prejudice to bear on the centre they are inspecting.

Workcover.

This is another government expectation of centre operators that needs to be less onerous, the expectation of intensive record keeping for workcover is also taking us away from our real work.

Of course accidents must be recorded and work places must be as safe as is humanly possible.

Assessing risks is part of every service offered to the public, however, constant intensive paper work, second guessing risks such as a suggested workcover example --- 'there is a broken tile in the bathroom' ---- we are advised... someone must write this down, suggest in written form a likely harm it may cause, propose in writing a date for it to be fixed, decide in writing how will it be fixed, record who will fix it, someone must record when it is fixed! This endless recording does nothing to keep workers safe, wouldn't it be more sensible to just fix the damn thing? We pay worker's compensation and it is in our own best interest to keep our workers safe, more paper work won't stop a worker from slipping over a mess not cleared away, and writing down that a mess should be cleaned up as it happens etc. etc. will not make a recalcitrant worker change his or her ways.

Solutions.

Workcover could continue to offer practical advice to workers and employers on working safely in the form of websites on the internet, in workshops, visits to centres that are advisory not punitive, DVD's, posters and pamphlets. Employers found to be deliberately negligent and causing harm to employees could be (and I believe already are) made responsible for costs of rehabilitation etc.

Education of staff and constant vigilance on the part of an employer anxious not to be sued, posters in the work place and reminders to staff to work safely, will ensure that work places are as safe as possible.

Local Government.

Passing health and safety in respect of food services to local councils has produced yet another layer of self important, Gestapo type officials into our services. Our centre was charged \$420.00 dollars for an inspector to visit our service for ten minutes and inspect us ... we are designated as a food service because we cut up fruit for the children's morning tea!

We have had to provide a refrigerator to store children's packed lunches from home, our clients from Asia and India are told by council officials that their children "have to keep their lunches in the fridge" or the centre will be fined - these clients have a cultural aversion to giving their children cold food.

In six months many of these children will be attending school, where they will leave their lunches in their bags on verandahs until lunch time!

We have never had a case of food poisoning in the service over 34 years, our centre is kept clean and two of our staff have completed food handling courses.

What has happened to common sense!

Possible solution

Can we please get some sense into the expectations of government officials, council, state or federal who really love to wield the big stick of possible fines at children's services, especially the private sector.

I am available at your convenience to discuss the contents of this submission, readers even those disagreeing with my conclusions are welcome to visit my centre at a time of their choosing. Please ring and organise a chat or a visit.

Thank you for providing me with the opportunity to present my submission and my concerns to you.

Please send any reply or comments to the above address.



Eileen Byrnes.
Director / Owner.

Jolly Frog Private Kindergarten.

CC to

COAG consultation RIS.

and various Organisations, Media, Senators and Ministers concerned with the provision of Australian children's services.