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Regulatory Impact Statement Child Care Assistance Package July 2015

Submission from
New South Wales Family Day Care Association

29 July 2015





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New South Wales Family Day Care Association has a strong history of providing education and care to children and families for over 40 years. We have always continued to meet the changing needs of families. We find we are now in a place where Family Day Care is unable to be part of a number of the Australian Government recommendations.

Community Child Care Fund

Within the Community Child Care Fund the availability of Community Support for Family Day Care in disadvantaged areas is limited to transport assistance only. Family Day Care is well placed in local communities to engage with families and build community engagement, particularly in regional and remote areas. Access to funds in line with centre-based services criteria would be required.

Moreover, given the potential lower overheads of Family Day Care, sustainability and viability in rural and remote areas may be more likely within a smaller early childhood education and care model such as a Family Day Care service.

Sustainability Support

Sustainability Support is only available in exceptional circumstances to Family Day Care and we have models operating in regional and remote areas where no other service is able to operate. Funding to these identified services is necessary to meet the fluctuating needs of the community. Family Day Care has been creative and up to the challenge in areas where markets are seasonal and variable.

Access and Affordability

Access and Affordability Support needs to be made available to Family Day Care in areas as set out in the recommendations as the same rationale can be used for Family Day Care as in centre based care in those areas.

Additional Child Care Subsidy

New South Wales Family Day Care Association is also concerned about the Additional Child Care Subsidy, particularly with regard to the interpretation of children at risk of serious abuse or neglect. At what point would a child be deemed to be no





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longer at risk? There are many instances where, if this funding was removed from a child, they would fall back into the serious abuse or neglect category. If this funding was not available or only for a limited period, children could slip through the system.

Inclusion Support

The removal of ISA's and move towards a single Inclusion Consultant Office in each state will certainly limit availability to support services and networking opportunities. With the removal of professional development funding services /staff will struggle to identify the diverse needs of children and families.

Activity Test

We are also concerned about parents' work patterns being linked to an activity test; that will then be linked to children's attendance in an approved Early Childhood Education and Care Service. In many instances Family Day Care services do not have set hours, allowing for flexibility for families. However, if a family was only able to use 12 hours of funded education and care per week due to their inability to meet the activity test and be under the specified income threshold, educators would struggle to incorporate two six hour days as finding other families to cover the other part of the day is difficult in many areas.

As well, children have the right to good quality early childhood education and care services. This should not be linked to parents' work patterns.

We would like to thank you for the opportunity to respond to this regulatory impact statement.

On behalf of New South Wales Family Day Care Association,

Anita Jovanovski, CEO

Kerrie Yates, President

