



Ms Carmel Donnelly PSM
Chair, Independent Pricing and Regulatory Tribunal
Early Childhood Education and Care Review
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SYDNEY NSW 1240
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15 November 2023

RE: FDCA Submission to IPART's Early Childhood Education and Care Review Interim Report

Dear Ms Donnelly,

Family Day Care Australia (FDCA) welcomes the opportunity to provide a submission in response to the draft findings and recommendations outlined in the Interim Report for the Independent Pricing and Regulatory Tribunal's (IPART) Early Childhood Education and Care Review ("the Review").

In this submission, FDCA seeks IPART's assurance that the important role of family day care is adequately considered and clearly recognised in the Final Report for this Review, and recommendations are made that will support the continued growth and viability of the sector.

We note that the broad terms of reference for IPART's Review are to:

1. review the market and report on factors driving accessibility, consumer choice, affordability and supply of services.
2. collect cost and revenue data on current fees, household out of pocket costs and provider revenue and costs.
3. estimate benchmark prices that reflect the costs of providing quality services and compare service fees.
4. recommend ways to improve accessibility, consumer choice and affordability.

1. About Family Day Care Australia

FDCA is an apolitical, not for profit, national member association representing approximately 10,000 family day care educators and around 400 approved family day care services. Our mission is to represent, support and promote the family day care sector in delivering high quality early childhood education and care (ECEC) to more Australian children.

FDCA supports the National Quality Framework (NQF) governing the ECEC sector and, as the national peak body for the family day care sector, shares many objectives in common with Australian governments and regulatory agencies including:

- ensuring the ECEC sector is affordable, accessible and flexible;
- promoting continuous improvement in the provision of quality ECEC services;
- reducing regulatory and administrative burden for ECEC services, whilst simultaneously improving the efficiency and cost effectiveness of the regulation of ECEC;
- supporting measures to build a highly skilled workforce; and
- increasing workforce participation and women's economic security.

2. About the family day care sector

The family day care sector is an essential part of the ECEC sector, providing flexible, affordable and accessible education and care for more than 40 years. Regulated under the *Education and Care Services National Law Act 2010* and the *Education and Care Services National Regulations*, it plays a vital role in meeting the diverse and changing child care needs of a significant proportion of Australian families, while at the same time also responding to many parents' choice for a 'home-based' and 'family-like' environment for their children.¹

While educators are registered with approved services, they effectively run their own small business, working from their own homes with small groups of no more than four children under school age, with the option to care for an additional three school aged children outside of school hours. This provides educators with a unique opportunity to personalise learning programs and to develop strong connections with children and families.

According to the latest *Child Care in Australia* quarterly report² issued by the Commonwealth Department of Education, the family day care sector supports more than 54,010, or 5.4% of families across Australia. Of the 1,412,320 children nationally, who attended approved ECEC services in the June quarter 2023, a total of 75,550 or 5.4%, attended family day care.

NSW is currently the Australian state with the largest family day care community, with 23,670 children attending this type of care. This equates to 5.1% of all children attending ECEC in NSW, supporting 18,090 (5.5%) of NSW families.

Greater flexibility and non-standard hours care

Importantly, the family day care sector offers significantly higher levels of flexible sessions than centre-based day care. For example:

- 84.7% of family day care services offer shorter sessions (up to 6 hours) compared to only 17.2% of long day care services.³
- 94% of family day care services also offer longer sessions (7-12 hours).

¹ Pascoe, S. Brennan, D. (2017) *Report of the Review to Achieve Educational Excellence in Australian Schools through Early Childhood Interventions*

² [Child Care Quarterly Reports, June 2023](#)

³ Baxter, J., Budinski, M., Carroll, M., Hand, K., Rogers, C., Smart, J., Bray, J.R., Gray, M., Blaxland, M., Katz, I., & Skattebol J. (2019) *Child Care Package Evaluation: Early monitoring report*. (Research Report). Melbourne: Australian Institute of Family Studies.

- 65.3% allow for the swapping of days/sessions or sessions to be added or changed at short notice, compared to 51% and 50.2% of long day care services respectively.⁴

This flexibility is critical to catering for the current and future needs of Australian families, especially in the face of changing work patterns, where casual, contract and part-time work is common, and women form 68.1% of the part-time workforce.⁵

Family day care also offers considerably higher levels of non-standard hours care, compared to the long day care sector:

- 88.2% of family day care services offer sessions of care on weekdays before 7am or after 6pm, compared with 45.7% of long day care services.
- 85.5% of family day care services offer care on weekends, compared with a mere 0.5% of long day care services.
- 47.5% of family day care services offer overnight care, as compared with 0% of long day care services.⁶

As IPART points out in its Interim Report, availability of responsive ECEC services during non-standard hours as well as occasional care is absolutely key to supporting a range of front-line employees and contractors who work casual and on-call shift work, split shifts and irregular hours in a range of occupations including nurses, paramedics, police officers, FIFO workers, cleaning contractors, factory workers, farmers and those that work in the hospitality industry.

Supporting families in areas of least advantage

The recent research undertaken by the Australian Competition and Consumer Commission (ACCC) highlights that the family day care sector provides much needed ECEC for Australian families in areas of least advantage.⁷ FDCA's own research shows 24% of educators nationally provide family day care in areas that are ranked in the two highest deciles on the SEIFA index and over half of educators (54%) being located in areas ranked in the first five deciles of the SEIFA index.⁸ Furthermore, 27.6% of family day care takes place in regional, rural and remote areas of Australia.⁹ In some of these areas, family day care is the only ECEC choice available.

Supporting culturally and linguistically diverse (CALD) families and communities

Recent evidence¹⁰ also shows that family day care is playing a significant role in supporting children from CALD backgrounds and their families. Indeed, the

⁴ Ibid.

⁵ www.wgea.gov.au/data/fact-sheets/gender-workplace-statistics-at-a-glance.

⁶ Baxter, J., Budinski, M., Carroll, M., Hand, K., Rogers, C., Smart, J., Bray, J.R., Gray, M., Blaxland, M., Katz, I., & Skattebol J. (2019) *Child Care Package Evaluation: Early monitoring report*. (Research Report). Melbourne: Australian Institute of Family Studies.

⁷ ACCC: Childcare Inquiry, Interim Report, June quarter 2023

⁸ FDCA, Family Day Care Sector Profile, June 2022

⁹ Department of Education, Child Care in Australia report, June Quarter 2023

¹⁰ Social Research Centre: 2021 ECEC National Workforce Census, August 2022

2021 ECEC National Workforce Census shows around half of the total number of children attending child care services during the reference week from (or had parents/guardians from) a refugee or special humanitarian program background, attended family day care services. This compares to only 3,343 in centre-based services, a sector over 10 times the size of family day care.

The ACCC's research has also confirmed that compared to other child care types, family day care is preferred by families where other languages other than English are spoken.¹¹

3. Parent's options constricting through a sector in decline

As you would be aware, the family day care sector is in a period of sustained decline.

This fact was highlighted in the 2021 *Early Childhood Education and Care National Workforce Census* report which revealed that, since 2016 the family day care sector nationally has lost 59% of its educators. Furthermore, more than half of this loss, 30% (over 6,000 educators) occurred since the introduction of the Child Care Package in July 2018.

Unsurprisingly, the decline in educator numbers correlates with a comparable decline in the number of children and families able to access family day care. In September 2018, there were 131,600 children and 89,160 families nationally utilising family day care nationally. By June 2023, there were 75,550 children and 54,010 families using family day care. This represents declines of 42.6% and 39.4% respectively.¹²

Family day care is a unique and essential part of the ECEC landscape in Australia. Parents and guardians with children in family day care often choose this form of care because of the *type* of service offered. That is, they highly value the home-based, small group environment provided by family day care.¹³

Furthermore, as mentioned above, the family day care sector provides much needed ECEC for Australian families in areas of least advantage. This means the decline in family day care services is likely to impact households in vulnerable situations and areas disproportionately, because they rely more on these care types than other households. Family day care is also preferred by families where other languages other than English are spoken.¹⁴

Over 40 years ago our sector pioneered the 'sharing economy', leveraging the capacity and capabilities of communities to deliver a unique and innovative approach to supporting the diverse ECEC needs of Australian children and families. What evolved was a thriving network of early childhood

¹¹ ACCC: Childcare Inquiry, Interim Report, June 2023

¹² Department of Education, Child Care in Australia report, June Quarter 2023

¹³ ACCC: Childcare Inquiry, Interim Report, June Quarter 2023

¹⁴ Ibid.

education professionals, mostly women in small business, that was the global benchmark in home-based ECEC approaches.

However, sadly, through more than half a decade of neglect, 'blunt instrument', compliance focused regulatory reform, and inequitable market intervention from governments, our sector is facing immense viability strain and the resulting outcome for children and families will be catastrophic. Despite common misconceptions, this decline is no longer a function of governments justifiably cancelling the approvals of unscrupulous operators but is in fact the demise of many of our sector's oldest and most respected services. Equally, the decline is not a product of waning demand, in fact, demand for family day care services has never been higher. Data from FDCA service members indicates that over 2,500 new educators are needed immediately just to meet current confirmed child waiting lists.

Without prompt intervention the family day care sector faces collapse, and in turn, the families and children for whom family day care is, for so many reasons their option of choice, or in many cases, their only choice, will be left stranded.

4. Response to the Interim Report's findings and recommendations

FDCA supports the overall finding of IPART's Review, that "there is scope to improve affordability, accessibility and choice for families in NSW, in particular for children with disability, additional needs or experiencing disadvantage or vulnerability." However, we emphasise again, that in considering strategies and solutions to improve affordability, accessibility and choice in ECEC in NSW, it is imperative that family day care be considered as part of the mix.

In sections 4.1 and 4.2 below, we draw to your attention to two key interrelated factors that are critical to address in order to support ongoing affordability, sustainability and viability of the family day care sector:

- Current calculation of the Child Care Subsidy (CCS) rate cap for family day care (4.1)
- Workforce challenges and the need for innovative solutions (4.2)

In Section 4.3 we provide specific feedback on the Interim Report's draft recommendations most relevant to family day care.

4.1 Current calculation of the CCS rate cap for family day care

As the Interim Report rightly concludes, the current funding model for the ECEC sector is mostly reliant on demand-side funding through CCS.

For family day care, the lower rate cap that applies to family day care compared to centre-based care is a hugely significant issue affecting the sustainability and viability of the family day care sector, and ultimately a significant contraction of the ECEC choices available to families.

FDCA's long-standing position is that the assumptions underpinning the calculations leading to the current CCS fee cap rates were never, or are no longer, accurate/applicable. These assumptions included the premise that family day care had "lower overheads" than centre-based care.

We have constantly advocated that the hourly CCS cap rate for family day care should be raised, at least in line with the calculation afforded to centre-based care services so that it more accurately reflects the cost of providing family day care; and an additional loading of 20% be applied to the recalculated CCS fee cap for non-standard hours family day care to adequately reflect the cost of providing such care.

In particular, FDCA has repeatedly challenged and refuted the 'lower overheads' assumption underpinning the calculation of the inadequate CCS cap rate for family day care. Consultation and evidence from our members show that, while family day care can be more agile and efficient in meeting and responding to variable demand especially in 'thin-markets', the 'dual-layered' overheads for both family day care services and family day care educators are fundamentally comparable to those in centre-based care.

FDCA was pleased to note that IPART's Review found¹⁵ that the costs calculated for family day care were "comparable to long day care", confirming FDCA's position on this matter.

As sole trader independent contractors, family day care educators have significant setup costs and ongoing overheads including, but not limited to, relevant play equipment; property maintenance and cleaning costs; ongoing training and maintenance of mandatory qualifications; mortgagees or rent; insurances (e.g. home and contents, public liability, health, personal accident/income protection, car), bookkeeping and accounting expenses, IT equipment and software licenses and so on.

Furthermore, following sustained and extensive regulatory reform, specific to family day care,¹⁶ overheads and administration costs for family day care services, acting as 'co-regulators' to support compliance and continuous improvement by educators, have increased significantly.

The Interim Report notes that in NSW the provision of non-standard hours care appears to be declining in the family day care sector.¹⁷ In our view this is symptomatic of the cost of providing of such care and the inadequate rate of the CCS that applies to family day care.

FDCA recommends therefore that the NSW Government urges the Commonwealth Government to:

¹⁵ Ibid p.179.

¹⁶ For example, in a survey of our service members about implementing the changes to EFT CCS gap fee collection from 1 July 2023 as per the recent amendment to Section 201(B) of the Administration Act, almost two thirds (63%) of respondents reported experiencing either "very high additional admin burden" or "significant additional admin burden" (33% and 30% respectively).

¹⁷ IPART Review of early childhood education and care, Interim Report, October 2023, p.46

- 1. raise the hourly CCS cap rate for family day care in line with the calculation afforded to centre-based care services so that it more accurately reflects the cost of providing family day care;**
- 2. apply an additional loading of 20% to the recalculated CCS fee cap for non-standard hours family day care to adequately reflect the cost of this type of care.**

4.2 Workforce challenges and the need for innovative solutions

While we accept that the workforce challenges facing family day care and the wider ECEC sector are multifactorial, family day care must be considered as an integral part of any solution to address these challenges. Due to its unique structure, family day care has the capacity to provide innovative solutions to both the ECEC workforce and supply crises, especially in regional areas.

As the Interim Report highlights, family day care becomes a larger part of the mix of available ECEC services, the more remote the geographical area. This is because of the flexibility in sessions offered and the fact that it can offer care for school-aged children as well, particularly in communities where school-based Out of School Hours Care (OSHC) is not viable.¹⁸

This capacity is also noted by the Australian Children's Education and Care Quality Authority's (ACECQA) submission to the Productivity Commission Inquiry into ECEC:

"As governments expand access to education and care, provision needs to remain flexible to ensure services are accessible and available for the hours required to support diverse family circumstances and workforce participation. Family day care services, for example, have flexible hours and are often the best option for children and families who are seeking a home environment, including shift and emergency workers and those based in regional and remote areas."

As such, governments should support the implementation of a range of measures to better leverage the capabilities of the family day care sector in boosting access to quality, flexible and affordable early ECEC across areas of limited supply, in turn supporting increased women's workforce participation, and importantly, ensuring families have choice in selecting an ECEC type that suits their diverse and individual needs.

However, as mentioned earlier, significant numbers of educators have left the sector since 2016¹⁹, and decreasing educator numbers place viability pressure on the services given the levy-based revenue structure in family day

¹⁸ Ibid, p.123.

¹⁹ FDCA recently commissioned independent agency Survey Matters to conduct research on our behalf on the reasons why family day care educators have left the sector. Preliminary qualitative findings point to financial barriers in setting up a family day care business, the increase in regulatory and administration burden and (the residual impact of) COVID as being significant factors. A report on the quantitative element of the research will soon be available.

care. Hence the need for consideration of additional supports, such as targeted or operational funding.

Furthermore, as the Interim Report reveals, supply side funding programs are inconsistent in how they fund different types of services and family day care providers are generally less likely to attract supply-side funding than other service types.²⁰ This is because such programs are generally designed without taking the model or context of family day care into account.

Training is a critical consideration in meeting the workforce challenges facing the sector. Innovative solutions, adequately supported by targeted funding, are urgently required in the family day care context, given that the sector faces additional workforce and recruitment challenges with the removal of the “working towards Certificate III” provision in the National Regulations.

FDCA is experiencing strong interest from both industry and governments in exploring innovative options for increasing the provision of family day care in regional areas and/or ‘thin markets’ within existing regulatory frameworks. We are currently exploring innovative educator and service incentivisation measures with industry in mining towns in Central Queensland, and we are in similar discussions with the Department of Defence, the South Australian Government, the NSW Government, the Queensland Government and GrainGrowers Australia.

Among other options that we are exploring, is a paid practicum for “working towards Certificate III” family day care educators be considered to work in partnership with a qualified family day care educator (and in turn increase the educator to child ratio and thereby supply). FDCA has been in discussions with several state regulatory authorities, including NSW, as well as our industry partners, to explore innovative solutions such as this, with a focus on boosting supply in regional and remote areas.

We have already mentioned above the greater presence of family day care, compared to other care types, in areas of least advantage. For family day care to better cater for the needs of vulnerable cohorts of children, particularly those in regional and remote areas (to which it is so clearly suited), governments should invest in measures to increase viability and promote growth for those service willing and able to operate in these areas.

We therefore recommend that all governments:

- 1. develop a direct funding support program (an “Approved Service Engagement Payment”) for family day care approved services to assist in the recruitment, induction and training of new family day care educators; and**
- 2. develop a direct funding support program (an “Educator Start-up Grant”) for new family day care educators to assist in overcoming some of the financial barriers to entry into the sector in establishing their micro-business.**

²⁰ Ibid, p 165

4.3 Specific feedback on relevant draft recommendations

In addition to the above general comments and recommendations, FDCA submits the following specific feedback.

Recommendations (pp.14-18 incl.)	FDCA feedback
<p>Priority draft Recommendations</p>	<p><u>Recommendation 1</u> We support the proposal for an integrated approach to ECEC funding, with the caveat that it MUST take the family day care sector model and context into account and be supported with comprehensive consultation with all elements of the early childhood education and care sector, including family day care. Also see our comments above at 4.1 and 4.2 relevant to funding issues.</p> <p><u>Recommendation 2</u> FDCA supports the development of an ECEC workforce strategy that adequately considers and recognises the role played by the family day care sector, and addresses the issues raised at 4.1, 4.2, and 4.3 herein.</p> <p><u>Recommendation 3</u> FDCA has concerns about unintended consequences that may arise from the proposed "digital service and data strategy", designed to assist families to easily find, choose and use ECEC services available in their area. For example, how will the data about services be collated? What data sources will be used? How will family day care educators be included in the information? Will this strategy duplicate information and tools already available?</p> <p>For example, the federal Government's Starting Blocks website also purports to provide families with a tool to help them make choices about ECEC services in their area. However, it significantly underrepresents the family day care sector because it <u>does not</u> include individual family day care educators (10,000+), listing only approved family day care services (approximately 400, which may have anywhere between 1 – 150 educators registered with them).</p> <p>It is therefore vital that the proposed NSW digital service and data strategy be underpinned by a thorough consultation process in order to take into account the family day care model and context. In terms of data collection FDCA has developed an online locator tool that is auto-populated with the locations of FDCA educator members nationally and thus may be able to assist in the provision of accurate and up-to-date educator location data (please see https://www.familydaycare.com.au/find-child-care).</p> <p>Furthermore, if this recommendation is actioned, the impact on family day care services and educators needs to be thoroughly tested and trialled in the development of any</p>

	<p>digital tools to avoid unintended consequences, as has been the case with the NSW Government's Transition to School Digital Statement project.</p> <p>From July 2023 FDCA has supported the NSW Department of Education to engage with family day care educators and approved services to participate in a trial to support children in their transition to school. The Department has engaged FDCA to work with the sector to trial the use of the Transition to School Digital Statement with a goal of designing a bespoke platform for family day care. Preliminary feedback from applicants and participating providers and educators has been overwhelmingly positive.</p>
<p>Accessibility – availability and choice</p>	<p><u>Recommendations 5-7</u></p> <p>The family day care sector is currently locked out from accessing the funding made available to the NSW by the Commonwealth to support preschool education. The delivery of funded preschool places within the family day care sector needs to be considered, given that an increasing number of family day care educators now hold ECEC qualifications higher than Certificate III level.²¹ This could also potentially alleviate the supply of preschool education to families in regional and remote areas, especially in cases where extended hours of preschool education is needed to meet community needs.</p> <p><u>Recommendation 8</u></p> <p>We support improvements in availability of information to assist families in making informed choices about ECEC options. However, as we highlight above in our response to Recommendation 3, any tools developed to assist families to access information about available ECEC sessions need to take the context and model of family day care into account and be based on thorough consultation with the sector.</p> <p><u>Recommendation 9</u></p> <p>Regarding the barriers that families living in outer regional and remote areas face, additional funding and innovative solutions that include family day care, are needed. See our comments at 4.2. Additionally, set-up costs need to be taken into account when considering solutions.</p> <p>In the family day care context, as IPART's Interim Report points out (p.134), a start-up grant used to be available (prior to 2011) to new family day care educators in recognition of the substantial costs faced by them in starting up their business. This is a significant barrier faced by services that wish to expand or set up in new areas, and qualified educators who may be interested in setting up their own family day care business. Equally, there is no operational funding available to local Governments that may also be interested in setting up a family day care</p>

²¹ According to 2019 research conducted on behalf of Family Day Care Australia, the [Attracting the next generation of family day care educators](#) report, 39% of educators hold a Certificate III qualification, 49% hold a Diploma qualification, 5% hold a Bachelor Degree and 1% a Masters Degree.

	<p>service in regional and remote areas. Availability of suitable premises is also another issue that arises in regional and remote areas and requires innovative thinking e.g. use of in-venue care where educators' own residences may not be suitable in terms of location or other factors.</p>
<p>Accessibility – inclusion</p>	<p><u>Recommendation 11</u> The family day care context, with its small group setting, is conducive to meeting the needs of children who are from CALD backgrounds, vulnerable, disadvantaged and/or with special needs. However, there needs to be easily accessible additional funding support for families and additional funding support available to assist family day care educators and services support these children.</p> <p>The Commonwealth's Inclusion Support Program (ISP) does provide funding to support inclusion of children from some of these cohorts, however the recently released Evaluation of the Inclusion Support Program undertaken by the Australian Institute of Family Studies (AIFS), found that while the program was supportive of inclusion of children with additional needs and is supported by stakeholders, there are a number of aspects of the program which do require review, as does its broader context and focus. While the ISP plays a role in promoting inclusive education, several deficiencies hinder its effectiveness. Insufficient funding, inadequate training and professional development, limited access to specialized support, inconsistent implementation of inclusive practices, and challenges in collaboration and communication are key areas that need attention.</p> <p>More specific to family day care, the ISP review recommended that "the Department should consult with providers, services and carers in the Family Day Care sector to consider more effective means of supporting inclusion in the sector as the Family Day Care Top-Up does not appear to be an effective mechanism."</p> <p>As such, FDCA strongly concurs with this recommendation.</p> <p><u>Recommendation 14</u> FDCA supports the development of resources in community languages. Given the significant proportion of CALD families using family day care, FDCA expects to be involved in trialling any such resources.</p> <p>It should be noted that in December 2022 the Commonwealth Department of Education contracted Family Day Care Australia (FDCA) to undertake a survey and analysis on the demographics of family day care educators. The purpose of the FDC Educator Analysis project was to identify specific information on family day care educators to gain a comprehensive understanding of their demographics, age and education, especially people from culturally and linguistically diverse (CALD) backgrounds, to ensure learning materials developed by the Department are suitable and inclusive.</p>

	<p>As such, FDCA retains detailed data relating to the cultural and linguistic profile of the family day care sector which could be of significant value to the NSW Department in undertaking this work.</p> <p><u>Recommendation 15</u> FDCA supports in principle the improved articulation with and collaboration between ECEC services and allied health services to meet children's diverse needs in the important years before school. Our members tell us frequently that families often come to educators and services first for advice on where to access relevant services and how to navigate the system. Therefore, it is critical that any action in this area, including the proposed trials of wrap around services, cater for the family day care context and are not limited to centre-based care services.</p>
<p>Accessibility - information</p>	<p><u>Recommendations 16 and 20</u> See our comments already herein regarding CALD families. Additionally, our CALD services and educators have told us that CALD families have significant issues accessing meaningful information and navigating the ECEC system. Feedback from our CALD members emphasises that many families are unaware of the importance of quality ECEC in contributing to positive education outcomes for children. Information targeting these families must be in plain English, less text dense and more visual.</p> <p><u>Recommendations 17:</u> See our comments above at Recommendation 3 and 8.</p> <p><u>Recommendations 18 and 19:</u> We do not support the recommended enhancements to the National Quality Standard (NQS) to help families identify services with specific expertise in inclusive practice. There are already adequate requirements in the NQS and a strong emphasis on inclusion in the Early Years Learning Framework (2.0) as well, which all educators must comply with. Under the National Quality Framework (NQF) services must already display their NQS ratings.</p>
<p>Accessibility – funding arrangements</p>	<p><u>Recommendation 22</u> We support a review of NSW Government funding programs that aim to support accessibility and inclusion, and strongly advocate for thorough consultation with all elements of the ECEC sector, including family day care. FDCA is happy to facilitate contact with our educators and service members. Please also see our comments at section 4.2 and 4.3 which are relevant here as well.</p>
<p>Affordability of services</p>	<p><u>Recommendation 23</u> FDCA supports efforts to make ECEC services more affordable for families, especially those experiencing high levels of disadvantage and vulnerability, those from CALD backgrounds, and those needing non-standard hours care. However, it is critical that the inadequate CCS rate cap that applies to family day care be addressed as we explain at section 4.1.</p>

	<p><u>Recommendations 25 and 28</u> Regarding the recommendation to improve data transparency as part of the proposed digital strategy, we emphasise again the need for any such measures to be carefully considered to avoid unintended consequences and additional administration burden on educators and services and to thoroughly consult with the whole ECEC sector, including family day care. See our responses above in relation to Recommendation 3 and 8.</p>
<p>Supply of services</p>	<p><u>Recommendation 29</u> In principle FDCA supports the NSW Government advocating for CCS enrolment and attendance data to be made publicly available to enhance decision-making of all governments and providers, as long as this does not lead to additional administration burden for family day care services and educators.</p> <p><u>Recommendation 30</u> FDCA supports in principle the development of a NSW Early Childhood Education and Workforce Strategy to complement the National Workforce Strategy, based on the understanding that it will be underpinned by a thorough consultation process including the family day care sector. Please also note our comments at 4.2 above, which are relevant to the recommendations proposed here. Innovative solutions are critical to addressing supply of family day care in regional and remote areas in particular, including reviewing approval of in-venue care options for family day care.</p> <p><u>Recommendation 32</u> FDCA supports the development of a short-term educator relief policy to provide clarity around use of relief educators in the family day care sector.</p> <p><u>Recommendation 33</u> FDCA supports a review of the Childcare and Economic Opportunity Fund, including the Flexible Trials Initiative element, so that the requirements are less onerous on services to apply, and funding periods are increased (for example up to 3 years) to provide more certainty and incentive to apply.</p> <p><u>Recommendations 35 and 36</u> To support supply of family day care in regional and remote areas, the NSW Government should review and refine venue approvals processes and develop guidance around what constitutes an appropriate approved venue for family day care.</p>
<p>Provider Costs and Revenue</p>	<p><u>Recommendation 37</u> FDCA supports a review of all NSW funding programs and grants for the ECEC sector, so that they reduce administrative burden, provide family day care services more flexibility in meeting the relevant guidelines and that can accommodate innovative models of service delivery.</p>

	<u>Recommendation 38</u> Please refer to above comments at Recommendations 3, 8, 25 and 28.
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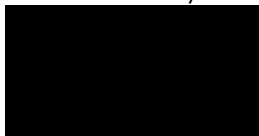
5. Conclusion

In closing, thank you again for the opportunity to respond to the findings and draft recommendations outlined in the Interim Report for IPART's Early Childhood Education and Care Review. I trust that our feedback will assist in developing IPART's Final Report.

As we have emphasized numerous times herein, given its unique model and capabilities, family day care should be central to all recommendations seeking to improve affordability, choice and flexibility of ECEC available to families; similarly for strategies seeking to improve access to non-standard hours ECEC, across regional, rural and remote Australia, and for specific cohorts of vulnerable and disadvantaged children and families and those with additional needs.

I would be happy to expand on any points raised in this submission, should you wish.

Yours faithfully



Chief Executive Officer
Family Day Care Australia