

2014 NQF Review – Consultation Regulation Impact Statement

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IF SUBMITTING ON BEHALF OF A COMPANY OR ORGANISATION:

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Inspiring Wonderful Childhoods

The Family Day Care Association of Queensland (FDCAQ) is the peak body for the Family Day Care Sector. FDCAQ has been supporting the Family Day Care Sector since 1977, playing a significant industry leadership and professional support role across Queensland.

Over many years, the Association has been

- providing professional support to local services, service users and educators
- strengthening networks,
- providing state-wide professional learning,
- delivering accredited and non-accredited training,
- providing resources, advice, representation,
- providing advocacy to Governments,
- delivering programs, and
- operating as an approved provider

The Association has extensive experience and knowledge of the program area, target group needs and best practice delivery strategies as well as the governance and management capacity. Family Day Care is our core business.

Family Day Care Association QLD is the state peak organisation for Family Day Care (FDC) Services throughout Queensland with 91% of FDC Services being members. We provide resource, support, advocacy, professional learning and accredited training.

FDCAQ operates a Registered Training Organisation which has been successful in receiving over \$.1.5 million in funding over the past 4 year to support Educators in FDC to achieve Certificate III, Diploma and Advanced Diploma qualifications in Children's Services.

FDCAQ operate as an Approved Provider for 14 FDC services in metropolitan, regional and remote communities, an In Home Care (IHC) service and Outside School Hours Care (OSHC) service along with 2 Inclusion Support Agencies funded under the Inclusion Professional Support Program (IPSP).



Our Purpose: FDCAQ inspires, leads and innovates a sustainable future for strong families, children and communities: by valuing diversity, recognising opportunities, promoting life-long learning and developing rich relationships



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In our response to the Regulation Impact Statement for propose options for changes to the National Quality Framework (RISNQF) we will cover:

1. Overarching Response to the Regulatory Impact Statement

2. Overview of Family Day Care

Role of the Coordination Unit

Role of the Educator in FDC

3. Response to Options for Consideration

- a. 3.1 Refining the National Quality Standard and assessment and rating process
- b. 3.5 Changes to prescribed fees
- c. 3.7 Improved oversight and support with FDC Services
- d. 3.8 Other changes which will have a regulatory impact

4. Appendices

2.1 FDCAQ Recruitment Position Paper

2.2 People Processes in Family Day Care

2.3 The Family Day Care Learning Community

2.4 Educator Role Statement

3.1 Comparison of costs between large and small services.

3.2 Costs in response to coordinator/educator ratios including associated with the recruitment, induction, and support and monitoring of an educator.

1. Overarching Response to the Regulatory Impact Statement:

Whilst we acknowledge the importance of taking time to review ongoing legislative, regulation and quality standard frameworks we would like to highlight that the implementation of the National Quality Framework saw a fundamental shift from a compliance, transactional system to a transformational outcomes based focus. This approach takes time for a whole of sector to shift thinking and practice. Also considering other external influences (i.e.: relevant training packages) and government systems to build skills and knowledge that inform and support the developing needs of the sector.

We highlight that some concerns that have been raised over the past 3 years are in response to the increase expectation the NQF.

Certainly as in any new system areas are identified through different lenses, than was considered prior to the changes and at times the unintended consequences become clearer.

In relation to the Family Day Care profession, it has become increasingly obvious that due to the long term high compliance history of Family Day Care, no one predicted the unprecedented growth and challenges to the traditional practice of the FDC program.

The consequences of this short sightedness, has seen the current approval of both Approved Provider and Service fall short in making appropriate assessment of who should be approved to deliver quality home based education and care.

Recommendations for FDC in the RISNQF appear to be a response to government's response to this, which has allowed significant growth in the sector, where some providers are delivering questionable practice.

The growth of the sector by nearly 50% in a very short period of time (less than 3 years), without adequate approval process by an informed and knowledgeable government on the FDC system, sees the RISNQF recommendation as a transactional response to manage poor practice rather than focus to transform and build capacity for the delivery of education and care quality outcomes of children.

As noted in several sections of the RISNQF pertaining to FDC many of the recommendations have little or



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no evidence to support options for consideration. The document regularly states “*It is indeterminable as to whether there would be a net benefit from this change*”. This continues to support FDCAQ’s position that due to lack of knowledge of the FDC system, recommendations are being made that will not increase quality and only see to penalize further the members of the FDC sector who are providing quality practice.

We highly recommend that before any further changes are considered, appropriate research into the evidence to support outcomes is sort.

2. Overview of Family Day Care:

It is important to be clear about the various roles in the FDC system and how it enables quality outcomes for children, rather than comparing to other education and care programs within the sector.

We know from a legislative point that FDC has the following structure:

Family Day Care is a network of professional educators (typically self-employed sub-contractors) providing education and care usually from their own home with a maximum of 7 children with 4 under school age. This network of educators is supported and administered by a coordination unit that under the NQF provides recruitment of educators and families, monitors compliance with regulation and legislation, provides mentoring and coaching on professional practice and administers the Child Care Benefit (CCB) system on behalf of government to parents.

However due to the very nature of FDC operating from an educators home the role of both educator and coordination unit staff is far more complex than eluded to in the above statement.

The Coordination Unit has a significant role in ensuring suitably experienced and qualified educators are recruited, along with the environment and family members. With intentionality, coordinators plan and deliver not only leadership and professional support, but maintain a monitoring role against legislation and regulation. This support is delivered in a diversity of approaches depending on the geographical locations, community context, skills and attributes of the educator.

There is a strong connection to quality outcomes for children and highly skilled and effective coordination unit support to educators.

FDCAQ has recently researched and created a recruitment and induction process for high quality educators, in [appendix 2.1 FDCAQ Recruitment Position Paper](#) we highlight the importance of the contemporary approach to recruitment in order to attract high quality educators as opposed to redundant thinking based on arbitrary numbers.

Coordination units have a particular focus on understanding adult learning principles in their role of ensuring quality outcomes to children in an educator’s home environment. These principle provide us with an understanding that much of our knowledge of teaching with intentionality in relation to children also applies to the interactions and teaching strategies we apply when working alongside an educator.

Best practice in adult teaching strategies require teachers to develop mentoring and support processes which enables the learner to develop dispositions for learning. These dispositions for learning are developed when coordinators work with an educator as equal partners and each party recognizes the skills, attributes and competencies they bring to any learning experience.



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Knowles work on 'Andragogy' highlights 5 key learning principles for consideration when working with adult learners.

1. Self-concept: *As a person matures their self-concept moves from one of being a dependent personality toward one of being a self-directed human being*
2. Experience: *As a person matures they accumulate a growing reservoir of experience that becomes an increasing resource for learning.*
3. Readiness to learn. *As a person matures their readiness to learn becomes oriented increasingly to the developmental tasks of their social roles with families, children and coordinators*
4. Orientation to learning. *As a person matures their time perspective changes from one of postponed application of knowledge to immediacy of application, and accordingly their orientation toward learning shifts from one of subject-centeredness to one of problem centeredness – hence the precedence toward the on the job learning.*
5. Motivation to learn: *As a person matures their motivation to learn increases to an internal process – driven by own motivation to learn. (Knowles 1984:12).*

These principles align well with that of the more well-known theory of pedagogy applied to teaching child learning principles. The role of the coordinator once a person is deemed appropriate for the role of the educator is not a 'teaching role' but rather a mentoring and support role – **(See appendix 2.2 People Process in Family Day Care)** Walking alongside the educators, supporting their capacity to build competency through professional development planning, resourcing and engaging in problem solving processes. This happens through a range of strategies, while face to face home visits are a key component of building an understanding of the educator's practices this cannot be seen as the only or 'best' way to undertake this mentoring and support role.

What are some of the ways services actually support educators?

- In-depth Recruitment Process ensures the coordination unit are selecting educators that support the ethos and philosophy of the service, have the suitable attributes, skills and qualifications. Building a depth of knowledge about the educator, her/his family and environment. **See appendix 2.1 FDCAQ Recruitment Position Paper.**
- The Professional Development Planning Process – this requires a collaborative process where both the educator and coordinator identify the current strengths and attention to given to identifying the developmental areas and development actions – this is a requirement of the NQF. Underpinned by a strong critical reflection framework.
- Communication and Support Processes – Using both traditional and contemporary approaches to communication such as phone calls, meetings, newsletters, social media, discussion boards, peer buddy systems, web based forums and pod casts which promote new understanding and enhance practice.
- Development of systems and process that engages educators in a variety of support styles from team meetings, training, readings, resource material, assisting connection to community.

Appendix 2.3 The Family Day Care Learning Community further outlines a framework for ongoing development and support of educators.

When we consider the role of the educator we must understand that the changes required in the FDC environment over the past 10 to 15 years has seen significant increase in the expectation of educator's than was traditionally seen previous to 2000. Educators are typically self-employed and not only require the skills of delivering a quality learning environment, but that of running a small business, strong inter and intra communication skills in working with families, colleagues and community.

FDCAQ delivers training and professional learning across both the centre based and home based education care sector. During the roll out of the Early Years Learning Framework our experience of an educator of FDC (who at that time did not require any qualification until 2014) and educators of a centre based program, we observed that it was typically the person with the management or lead responsibility



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of the centre based program that held detailed knowledge of the EYLF and the new regulatory system. However in FDC, educators typically demonstrated the same level of knowledge – over and above those in the centre based environments who would hold a similar qualification to a FDC educator. This alone demonstrates the impact of a strong intentional recruitment and andragogy approach by coordination unit staff in supporting and recruiting educators. **See Appendix 2.4 Educator Role Statement.**

Educators hold the day to day management of their home based service in making decisions about the learning environment provided, managing the wellbeing and safety, implementing service policy and procedures, enrolment of families in the educators environment and although only required to hold or be studying towards a Certificate III qualification. It demonstrates that through the focus on quality recruitment and induction processes to attract applicants with the best skills and attributes and supported in a system with coordinators who are skilled and qualified in Andragogy, FDC provides an environment for skilful, self-managed adults to demonstrate quality outcomes for children.

3. Response to Options for Consideration

3.1 Refining the National Quality Standard and assessment and rating process

- ***Proposal 1.1 - Reducing the complexity of the National Quality Standard Proposal 1.2 - Streamlining of quality assessments***

We note concerns about the changes to elements, specifically a focus on continuous improvement missing continuous. We highlight the inclusion of the concepts that value it adds to bring focus on the particular areas of each standards.

We believe it is difficult to make a fully informed recommendation as the RISNQF does not provide sufficient rationale about the reason for some of the changes i.e.: removal of element on policy, detail of the concepts.

We believe as stated in our opening statements that 3 years is not enough time to bring in an outcomes based system from a compliance based system in order to make changes. We encourage caution in making drastic changes early in the implementation of the NQF.

Recommendations seem focused on streamlining the system to ensure services are assessed and rated more quickly and no rationale to the impact of **outcomes for children.**

- ***Proposal 1.3 - Reduction in documentation of child assessments or evaluations for delivery of educational program in OSHC services***

We accept the recommendation to reduce documentation for school age children and increased training for Authorised Officers in understanding the context of school age children in both OSHC and FDC.

- ***Proposal 1.4 - Significant Improvement required rating.***

In a circumstance that significant improvement is required the rating and assessment should cease and the regulatory authority to take immediate action in response to the unacceptable risk, for example through enforcement action, and the service would be required to display information to indicate this status to families (for example a notice stating “rating pending resolution of non-compliance”);-

No rating should be allocated if a service is considered to have significant non-compliance.

- ***Proposal 1.5 – Exceeding the National Quality Standard rating***

All standards should meet to exceeding

- ***Proposal 1.6 Options for Excellent rating***

We believe that the excellent rating must be kept. It provides aspiration to drive for better quality and supports trying to build the profile the sector as professional and quality.



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- **Proposal 1.7 - Ensuring ratings accurately reflect service quality**

Remove overall rating, however if Proposal 1.5 is accepted, this would only be relevant to rating of working towards. We believe by each quality rating being demonstrated, this would better support those services who have only marginally missed the meeting or exceeding rating to demonstrate the true practices of the service.

- **Proposal 1.8 - Length of time until services are re-assessed**

5 years is too long for assessment, when we reflect on the brain research, a poorly operating service could significantly impact the most important years of a child's development. However we would consider a self-assessment process that would require submission to the regulatory authority within 5 year period for services who have been rated meeting and or exceeding.

3.5 Changes to Prescribed Fees

Proposal 5.1; 5.2; 5.3; 5.4

Fees only to increase by CPI, no to recommendations of 50 or 100%

3.7 Improved Oversight of and Support within FDC Services

- **Proposal 7.1 – Approval of FDC services across jurisdictions**

We agree that all services must have approval in all states where they have educators operating across jurisdictions. We question the recommendation of being required to hold a principle office in each jurisdiction and how a physical office impacts quality outcomes for children in FDC.

We recommend considering what are the capacities a service must be able to demonstrate as a quality service i.e.: connection to community could be achieved by:

Build Advisory Group in local communities where educators are situated that included educator, family and local representatives.

Including the responsibility of providers to demonstrate outcomes are met and the state regulatory authority to holds suitable skills in benchmarking what represents contemporary practice to measure how providers are able to demonstrate meeting these outcomes.

In addition, the NQF has no centralised list of FDC educators, limiting knowledge about the extent of services operating across jurisdictions. Regulatory authorities may request a register of FDC educators from an approved provider with information about each of the FDC educators engaged or registered by the service – however, the mobility of educators means that once compliance action is taken, educators may simply move to a new service making them difficult to trace. Pg. 60 RISQF

We do not believe the statement above is directly linked to cross jurisdiction issues.

This section has two separate issues.

1. National register to deal with Educators (all) who have ceased operation and or employment due to significant non-compliance. We recommend that this is considered for further action.
2. Coordination units must be able to demonstrate ability to support, train and monitor educator where they have them registered (regardless of jurisdiction) i.e.: having a principle office in Brisbane will not determine if quality occurs in administration and support of educators based throughout QLD given the geographical size of the state, however the ability to demonstrate rigorous process would be of more value and impact to quality.

Attention to administration of cross jurisdictional approval process.

We strongly request that attention needs to be considered of cross jurisdictional approval process to ensure that there is not an increase of red tape and regulatory burden. Approval application to consider a registration process rather than full approval pending the providers practice in the existing jurisdictions



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(complaints/compliance) recommended.

- **Proposal 7.2 – Limiting the number of FDC educators in a service**

¹⁰ An application for FDC service approval must include the number of FDC educators expected to be engaged within 6 months, but there is no obligation for the provider to notify the regulatory authority of new educators once they have gained service approval, unless they are operating at an FDC venue

We recommend the approval review period require providers to provide monthly update of educator numbers in the first 6 months.

However we draw attention to the burdensome data collection by government under a national system and urge government to consider the ability of sharing already collected data under the CCMS system.

We further recommend that government consider its own data on FDC services who have achieved a rating of meeting or exceeding the NQS and the size of these services in response to the recommendations in this document that reducing the size of services will impact on better quality practice.

Limiting the growth of numbers of FDC Educators in a service would help to ensure that a new FDC service grows at an appropriate pace: i.e. That it has appropriate policies in place before it expands pg. 62 RISNQF

We raise concern that current state regulators do not already consider prior to approval that an applicant has written policies and procedures that demonstrate their ability to appropriately support and monitor educators regardless the size of the service.

We highlight that this recommendation is in direct opposition to the federal government's recommendations to FDC in response to Community Support Program Funding changes. Recommendations have been made by the federal government that services should consider merging in order to respond to the loss off operational funding.

These recommendations also have the potential to limit FDC's capacity in meeting the needs of families in accessing affordable, accessible and flexible education and care as there would less education and care available.

"Information from the Australian Government Department of Education has shown that there has been considerable growth in FDC services especially in the last year and that non-compliant services often had significant increased numbers of educators." Pg62 NQFRIS

The statement above is a direct example of poor government process in the approval of services.

The sector as a whole has demonstrated strong compliance over the history of FDC, the increase compliance issues has only increased since the implementation of the new approval process under the NQF. This issue is about government approving inappropriate providers and not having adequate knowledge to inform professional judgment of state regulatory authorities. Including low engagement with sector by federal government to ensure suitable and contemporary knowledge is held about best practice in FDC

We believe it is important to raise a comparison of growth from state to state, with a specific focus on QLD, NSW and VIC. Victoria has had the practice of limiting the size of the service for new approvals for the past two years. This practice has not seen the diminish in growth or compliance issues. We note that in QLD they have had little more than a 20% growth, where Victoria has almost quadrupled the number of services since 2009. The question may arise regarding geographic and are more new interested providers and population based in Victoria, however anecdotal information supports that there are over 1500 educators operating in QLD who are registered with service form other states.



“Such a change may in the short term reduce the number of FDC places available; however, as a whole, the sector is likely to compensate for this in the long run with a higher number of services (that is, rather than fewer large services, the sector would be characterised by a larger number of smaller services). To the extent that larger services are more efficient (i.e. generate economies of scale), a reduction in the number of educators per service could see a modest increase in unit costs. Given the cost of FDC service provision is predominated by the cost of the educator, any inefficiencies resulting from lost economies of scale are anticipated to be minor” pg. 62 NQFRIS

This statement provides strong evidence to the argument in the section above about the limited of knowledge by government and policy makers on how FDC operates at an in depth level. Costs of FDC are strongly impacted by the role of the coordination unit in ensuring educators ability to meet legislative and quality frameworks. In the past on average 50% of these costs were supported by federal government, with the removal of funding to over 80% of the sector in July 2015, this will mean that services will need to pass on these costs through levies to families and educators, which will ultimately increase costs to care. Suggestion of making services smaller will only slightly increase costs is an ill-informed assessment of the impact.

We would like seek further detail about how figures were collated to inform this recommendation.

See Appendix 3.1 Comparison of Costs between large and small services.

“Similar to benefits derived from a FDC coordinator to educator ratio, this proposed change is geared towards ensuring that FDC educators are better supported in their role. Some large FDC services have demonstrated they are not likely to be able to provide adequate support for FDC educators, as the principal office support staff may be too limited in resources to pay sufficient attention to all educators. Increased support for educators would result in a higher quality of service and education, ultimately translating to improved safety and quality outcomes for children.” Pg. 63 NQFRIS

We continue to argue that arbitrary numbers with no evidence to support this conclusion supports better quality practice. **See appendix 2.1 FDCAQ Recruitment Position Paper**

“The net impact of this change cannot be determined at this stage. Depending on where the limit is set, the long run costs are likely to be modest (although there will be additional costs associated with transition). Whether the benefits will offset these and produce a net positive impact overall, cannot be reliably gauged at this point.” Pg. 63

Statements in the section reinforce lack of knowledge of the recommendations, these recommendations are a transactional approach in the hope of stemming the growth of the sector to respond to current federal government fraud allegations.

This statement and previous referred to under the costs section that this would not be a blanket measure, it raises questions on how this is to be managed; and that the transactional approach will inadequately be used as ret erect to support governments action in responding to quality and alleged fraud, but in actual fact will not have any transformational change on creating capacity and ensure contemporary quality practice in FDC.

- **Proposal 7.3 – Mandating a ratio of FDC coordinators to educators**

“Recommendation: Amend the National Law on conditions on service approval to include a duty for the approved provider to ensure that FDC educators are adequately supported, monitored and trained-“pg. 64

Agree in principle, however one would assume that under the current legislation this is the requirement of all approved providers, the question is, if this expectation is already under NQS currently; what different level of power does this change create in the law for regulatory authorities?



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Statements in the RISNQF assume that this is not typical practice in FDC, we urge consideration to be given to the long term historical practice, prior to changes in government approval process. This demonstrates the current approval process is inadequate and continues to allow inappropriate providers to operate and state regulatory authorities who lack knowledge of best practice in FDC. They are therefore unable to make appropriate assessment of the new provider's ability to demonstrate suitable induction, training and support of educators.

We strongly recommend that additional training is provided to Authorised Officers in the FDC System.

Along with suitable investment to regulatory authorities to fulfill the role of approving, rating and assessing FDC.

For proposal 7.3 to be considered, further research must be completed to assess how rationale regarding coordinator/educator ratio has been created. How have the duties and diversity of coordination units been considered in coming to this conclusion? Due to the width and breadth of Australia we see FDC operating in many diverse communities which impacts on the size of coordination units and the duties. For example a small remote service may only have 12 educators with a perceived ratio of one coordinator to 12 educators, however the duties of this coordinator will include management responsibility, administration and coordinator field work. This is opposed to a large service that will have distinct roles of manager, administration and coordination field workers. We believe this calls into question the validity of data provided in Table 3.8 Estimated FDC co-ordinator to educator ratios 2013, page 65 RISNQF.

We recommend for specific skill sets in qualification to be developed and funded to support the unique role of the coordinator between adult education, home based environment, assessment of environment, supporting families and communities, training and professional learning, conflict resolution and knowledge specific to the learning and development of children.

In response to Table 3.9 Indicative average preliminary costs of co-ordinator ratios, page 65 RISNQF, please see calculations of actual service financial data in relation to the increased costs associated with recommended coordinator/educator ratios in **appendix 3.2 Costs in response to coordinator/educator ratios. Including associated with the recruitment, induction, support and monitoring of an Educator.**

This appendix outlines costs associated with supporting educators, the costs for the recommended ratios and other cost considerations to adapt to these ratios.

"This proposed change is geared towards ensuring that FDC educators are better supported in their role, for example through increased contact time with the FDC coordinator. Adequate support for FDC educators is particularly important, given they do not work in a centre-based service and are therefore less exposed to other educators, with subsequent impacts on professional development. Increased support from a co-ordinator would result in greater levels of supervision, a higher quality of service and education, ultimately translating to improved safety and quality outcomes for children." Pg. 66 RISNQF

We challenge the attitude that more hours and more supervision means high quality, more skilled and appropriate qualified coordinators and educators create quality outcomes with sound knowledge of andragogy.

When educators are appropriately recruited for skill, attributes and capacity the support provided by coordinators must be far richer than tick and flick supervision, FDC can occur 24/7. We reference our opening statements under section 2 Overview of Family Day Care.

"Assessment of net benefit

It is indeterminable as to whether there would be a net benefit from this change, as the likely costs to the sector are unclear and it cannot be robustly determined as to whether the extent of benefits related



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to higher quality FDC service provision would outweigh these preliminary costs.” Pg. 66 RISNQF

This statement continues to reinforce the limited knowledge of the sector and the role of coordination units in supporting quality outcomes for children, it seems ridiculous that the recommendations would be made without suitable evidence or with the proviso that appropriate research must occur before actions are taken. The fall out effect of taking such action would see the demise of a critical member of the education and care sector who is already reeling from government’s knee jerk reaction to alleged fraudulent practices and growth due to poor government approval processes.

We further recommend that government consider its own data on FDC services who have achieved a rating of meeting or exceeding the NQS and the coordinator/educator ratios of these services

- ***Proposal 7.4 – Mandating a minimum Certificate III for FDC educators***

“The main benefit of this proposed change is increased quality of education and care for children attending FDC services, by ensuring that FDC educators are fully and appropriately qualified before educating and caring for children. This is especially important in a FDC environment, where the FDC educator is generally without daily contact or support from other educators (in comparison to centre-based services).”pg. 67 NQFRIS

See appendix 2.1 FDCAQ Recruitment Position Paper.

Whilst we believe in the importance suitable qualifications to inform quality practice, anecdotal evidence suggests that due to the nature of the role of the educator in FDC and the recruitment and induction (induction visits every week for the 1st 10weeks) process and ongoing support by coordinators, Qualifications are part of the overall picture in supporting quality. The sector has demonstrated prior to the legislative changes with the NQF coordination units have been able to support the ongoing development and completion of qualification to provide overall quality.

A comparison to Centre based and FDC educators working on their own does not adequately demonstrate the impact to quality that would derive an Educator needing the cert III prior to starting. We would like to highlight that currently an assistant in Centre based environment is not required to be enrolled and studying towards and has 3 months to enroll after starting employment. As stated in our opening statement in section 2 the coordination unit plays a significant role in recruiting an educator with the appropriate skills and attributes and has an intentional approach to the ongoing support and development of educators. We challenge the thinking that just because you may be working in a space where several educators work alongside one another that those educators are providing intentionality of development and oversight of their colleague.

We also draw attention to the current accredited training system where we see Registered Training Organisations providing qualifications in a week and to date limited government action to manage this has occurred, we question how pushing people through qualifications rather than assisting the educator to connect to practice whilst working creates any better quality.

We reference Table 3.10 FDC educators working towards a qualification by state, 2013 page 67 RISNQF; we see significant increase in the states that have had the most growth in FDC in the completion rates of educators towards their qualifications. Prior to the NQF, QLD had the highest rate of educators qualified and or studying towards. Given the requirement to be enrolled and study towards a Cert III was only required from January 2014 we question the quality of learning from some qualifications provide in such a short time frame.

This recommendation will have significant impact on workforce capabilities for FDC.



Proposal 7.5 – FDC educator assistants’ activities

“The meaning of the term ‘regular appointment’ is unclear and is currently being construed by some service providers as allowing them to leave children with an assistant while they undertake personal tasks “pg. 68

An educator assistant must have in place a blue card and first aid and be approved by the service as a suitable person to operate as an educator assistant (registration process from the service). If for short periods of time, (consideration has been made to ensure the assistant is able to meet the safety needs of children and is a suitable person) is it not then the responsibility for the primary educator to provide the plan for children’s learning their absence.

Recommended scenarios were an Educator’s Assistant may operate:

Appointments must be no more than 3 hours in one period and no more than once a week unless meeting the following scenario. See #1 below

Appropriate reasons to utilise an assistant educator:

1. When an educator has young children with non-routine sleep patterns, i.e. school pick up and drop off, older children in care to attend play session-but also has young baby who is typically resting at this time.

We challenge what we perceive to be a negative connotation regarding that of personal tasks are not appropriate.

Consideration should be given to the cohort of educators that supports the federal government’s objective for flexible affordable and accessible education and care. Where an educator provides 24/7 care, consideration and planning about personal appointments should be considered. We believe that the recommendation of a session not more than 3 hours or once per week is able to support management of personal appointments.

• **Proposal 7.6 – Principal office notifications**

*By providing prior notification of principal office relocation, regulatory authorities will have better oversight of FDC services improving their ability to enforce the National Law and National Regulations.”
pg. 69*

In relation to where education and care is being provided in a venue attached to a FDC principle office than we agree the recommendation that regulatory authority must be informed and can amend or refuse approval.

However if considering a traditional FDC Office, we question what is the areas of the National Law and National Regulation that assessing the principal office will enhance?

Information provided in the RIS statement does not supply any rationale. Unless the request is to change the regulation of the Principle Office and what the principle office facilities must include, a different proposal would be required.

Just as FDC education and care is flexible and diverse, so is the way a coordination unit responds to having appropriate facilities to respond to the needs of the community and its local context.

We suggest that a criteria of what a coordination unit must provide to support the capacity of delivering quality outcomes for children would not be achieved by stipulating a physical place and facilities



For example:

Due to changes in CSP funding, services have had to consider ways to respond to the changing needs of FDC. Consider a small service in a rural town that will no longer receive sustainable funding. The service will close if it is required to continue to rent physical premises, an alternative is to use other community services space for parent and educator interviews, educator training etc., marketing and promoting the service. The coordinator could work from home and reports to line management structure. The approved provider could have in place suitable technology and policy to ensure quality service delivery is provided and governance practices of the service are complied with.

- **Proposal 7.7 – Powers of entry to FDC residences**

Agree in principle

3.8 Proposal of Particular Interest to the Sector

Child protection training (Proposal 8.3.8)

It is proposed that the National Law and National Regulations be amended to provide that nominated supervisors and persons in day to day charge of an education and care service must have undertaken child protection training.

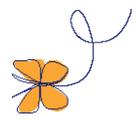
Recommendation: that all educators, providers of services must have child protection training if we are to uphold the rights of children.

In Summary:

We would like to acknowledge the Australian Government for providing the opportunity to respond to the Regulatory Impact Statement for proposed options for changes to the National Quality Framework.

As stated previously this report brings considerable focus on the alleged fraudulent practices and growth of FDC. It highlights government's challenges in having appropriate systems and knowledge of the sector in dealing with these issues.

Just as we require educators to call on their professional judgment based on skills, knowledge and experience, we call on government to do the same when assessing the appropriateness of a provider to deliver any education and care service.



4. Appendices

FDCAQ Recruitment Position Paper

As family day care continues its ongoing professionalisation and its alignment with the contemporary philosophy and practice of childhood education and care, there has been a shift in image from family day care 'mums' to family day care educators as education and care career professionals. Along with this shift there is a need for family day care to adopt increasingly strategic and sophisticated people processes to ensure that high quality educators are recruited and retained.

In writing this position paper, Family Day Care Association Queensland (FDCAQ), as Queensland's peak body for family day care, has drawn on best practice from the human resource management literature and applied it to the family day care context. In particular, FDCAQ seeks to embed and align people processes with the same spirit, philosophy and values as the contemporary education and care of children (e.g., as detailed in *Belonging, Being & Becoming: The Early Years Learning Framework for Australia* and *My Time, Our Place: Framework for School Age Care in Australia*). FDCAQ's goal is:

- *To demonstrate leading practice in achieving excellence through people in childhood education and care.*



Background

In the emerging world of work in the 21st Century, people are a key focus in building and sustaining organisational capability and delivering service excellence. A range of challenges exist for contemporary organisations including:

- An increasingly complex and changing environment requiring agility/ability to adapt quickly and build new capacity.
- An evolving shift in focus from industrial to service and knowledge work. This shifting nature of work has contributed to a focusing in on people as key to success, and the development of associated diverse policies, practices and systems to achieve this (Holland et al., 2012).
- Demographic changes, and a changing and increasingly diverse workforce.
- Increasingly discerning and mobile employees.
- The changing nature of the employment relationship and shifts in the balance of power between employer and employee.
- Changing customer expectations.



Contemporary family day care faces its own unique and dynamic set of circumstances (socioeconomic, political, technological etc.) including:

- The workforce is largely comprised of independent business operators.
- These independent operators are highly diverse in terms of background, culture, skill level, and qualifications.
- Family day care represents a unique type of workplace/work environment.
- As the contemporary environment is changing, the key relationship between educators and family day care services is continuously evolving and changing.
- Family day care businesses operate in a wide range of diverse communities, with diverse clients and circumstances.
- There is increasing competition for skilled educators.
- Many family day care businesses operate in isolated working environments.
- Information technology is rapidly changing.
- The sector is being rapidly professionalised.
- The sector is experiencing increasing regulation/legislation and change.



The new reality for organisations is illustrated by comparing the traditional (old) mindset with the new mindset (see table below).

Old Mindset	New Mindset
People need us.	We need people.
Jobs are scarce.	Talented people are scarce.
The competitive advantage = Money, machinery, geography.	The competitive advantage = Talented people.
We provide good pay and benefits.	We shape our strategy, our organisation and our jobs to attract, engage, develop and retain talented people.
One way - Employer in charge.	More mutual and collaborative relationship.
Attitude to learning and development = It makes some difference.	Attitude to learning and development = It makes a huge difference.
Loyal employees and secure jobs.	Mobile employees and short term commitment.
People accept the standard package offered.	People are discerning and expect more.
Human resource management is the responsibility of defined organisational roles/ areas.	People development is the responsibility of all leaders/managers, starting with the Board and CEO, as well as individuals and teams. People are active agents in their own learning and development.
Inflexible work practices.	Flexible work practices.
Reactive. Accountability low.	Proactive, planned and integrated into strategic business processes. Greater monitoring and accountability.
HR as a linear process.	A holistic, integrated people development process.
Development happens via training.	Development and learning are lifelong processes. They are woven into the organisation and happen through diverse means (e.g., coaching and mentoring relationships, stretch opportunities, reflection, training.)

In family day care in particular, learning, development and growth combined with a culture focused on people and relationships are crucial to achieving excellence in the education and care of children. This involves mindsets and approaches that are fundamentally different to those traditionally utilised.

The new mindset is transformational in approach. It is systems focused and intentional in shaping a people valuing culture. Whilst family day care has always been about people and relationships, within the context of 21st Century challenges there is a need for an increasingly professional, holistic, planned and articulated approach if we are to ensure sustainability and excellence in our core business.



Recruitment Philosophy

The old adage 'people are your most important asset' is wrong. People are not your most important asset. The right people are.

(Jim Collins, 2001, Good to great, p64)

As a crucial component of people processes, recruitment (or finding the 'right people') must be more than a stand-alone activity or a linear set of procedures, rather it is:

- An ongoing attitude or way of thinking that sits at the heart of the organisation and its search for excellence, and
- It involves leaders and managers at all levels.



Within the FDCAQ philosophy, recruitment is considered broadly and encompasses attracting and engaging the right people, and developing the foundations for their retention and growth.

FDCAQ adopts a contemporary mindset to recruiting in which:

- The search for talented people is proactive and ongoing, and guided by an evidence-based recruitment strategy.
- Recruitment has a lot in common with marketing (rather than 'purchasing').
- Recruitment is about marketing and engaging (as well as screening and assessing).
- Recruitment is recognised as a mutual process involving the recruiting family day care service and the prospective educator, rather than a primarily service-oriented and driven process.
- Innovative and diverse methods are used to attract talented people.
- Recruitment processes and outcomes are aligned with broader people processes and business strategy, with a focus on service excellence.





FDCAQ's Approach to Recruitment

FDCAQ emphasises the mutuality and relationship aspects of the recruitment process, rather than the traditional psychometric paradigm that tends to be more transactional and employer oriented (see summary of theoretical approaches in Appendix). Nevertheless the importance of rigorous, accountable, transparent and critically reflective processes is integral to the recruitment approach taken.

Within FDCAQ's approach, recruitment is:

- *Integrated* and *Influencing* - fundamentally linked strategically to the growth and sustainability of the organisation.
- *Reflective* and *Quality Oriented* - Another opportunity to demonstrate reflective practice and the achievement of quality outcomes.
- *Agile, Flexible* and *Innovative* - An open process that adapts to context and particular needs.
- *Relational/Valuing* of people.
- *Holistic* in orientation - Considering clients/customers, people, organisation, community, broader society; internal and external factors.
- An *Open, Collaborative* process - Engaging stakeholders both internally and externally.

FDCAQ has developed a workbook entitled *Recruiting High Quality Educators: A Workbook for Family Day Care Services* to assist family day care services to manage the educator recruitment process. This resource reflects the philosophy and approaches outlined in this document.

In recognition that there is no one 'right' way to undertake recruitment, the workbook is not a step by step 'how to' guide but an accessible, applied resource that assists users to develop a proactive, strategic approach and to consider contextual and other factors that may influence how recruitment is undertaken locally.



References

Australian Government Department of Education, Employment and Workplace Relations (2009) *Belonging, Being & Becoming: The Early Years Learning Framework for Australia*. Canberra, ACT: Commonwealth of Australia.

Australian Government Department of Education, Employment and Workplace Relations (2011) *My Time, Our Place: Framework for School Age Care in Australia*. Canberra, ACT: Commonwealth of Australia.

Billsberry, J. (2007) *Experiencing recruitment and selection*. Chichester, UK: Wiley.

Collins, J.C. (2001) *Good to great: Why some companies make the leap...and others don't*. London: Random House.

Holland, P., Sheehan, C., Donohue, R., Pyman, A., & Allen, B. (2012) *Contemporary issues and challenges in HRM (2nd Ed.)*. Prahran, VIC: Tilde University Press.

Michaels, E., Handfield-Jones, H., & Axelrod, E. (2001) *The war for talent*. Boston, MA: Harvard Business School Press.



Appendix

Theoretical Approaches – Recruitment



Psychometric Paradigm (Dominant Paradigm/ Traditional Paradigm)	Social Process Paradigm	Person-Organisation Fit
Organisational perspective / point of view is dominant.	Viewed as a social process rather than a series of steps to be undertaken. Includes consideration of potential employee's perspective.	Interactional perspective - attempts to consider perspectives of both potential employees and organisation simultaneously. Relationship orientation - Process seen as first stage in development of a relationship between the two parties.
Transactional focus - structured process - series of defined steps undertaken - job analysis, selection criteria development, KPIs etc. Use of rigorous and 'scientific' methods (e.g., ability and personality testing) recommended. Focus on employer assessment of person against KSAOs* required for position.	Often used as a critical adjunct to the psychometric process.	Considers interaction between people, and between people and environmental factors. Both employer and employee are assessing the process and each other.
Viewed as a rational decision making process operated by the employer.	Subjectivity acknowledged. Awareness of limitations of rational decision making paradigm.	Important to help applicants find ways to assess their own fit rather than solely decision of employer.
Process can become ritualised - both for employers and potential employees.		Rapidly growing area of interest in the literature. Efforts underway to build tools to examine fit.

*KSAOs - Knowledge, skills, abilities and other attributes.

(Billsberry, 2007)

Note: Although the traditional psychometric approach is dominant in the literature and training, it has been found that in practice employers rely heavily on interviews and base selection decisions on subjective impressions formed of the applicant. More rational and scientific methods appear to be used in a more supportive role.

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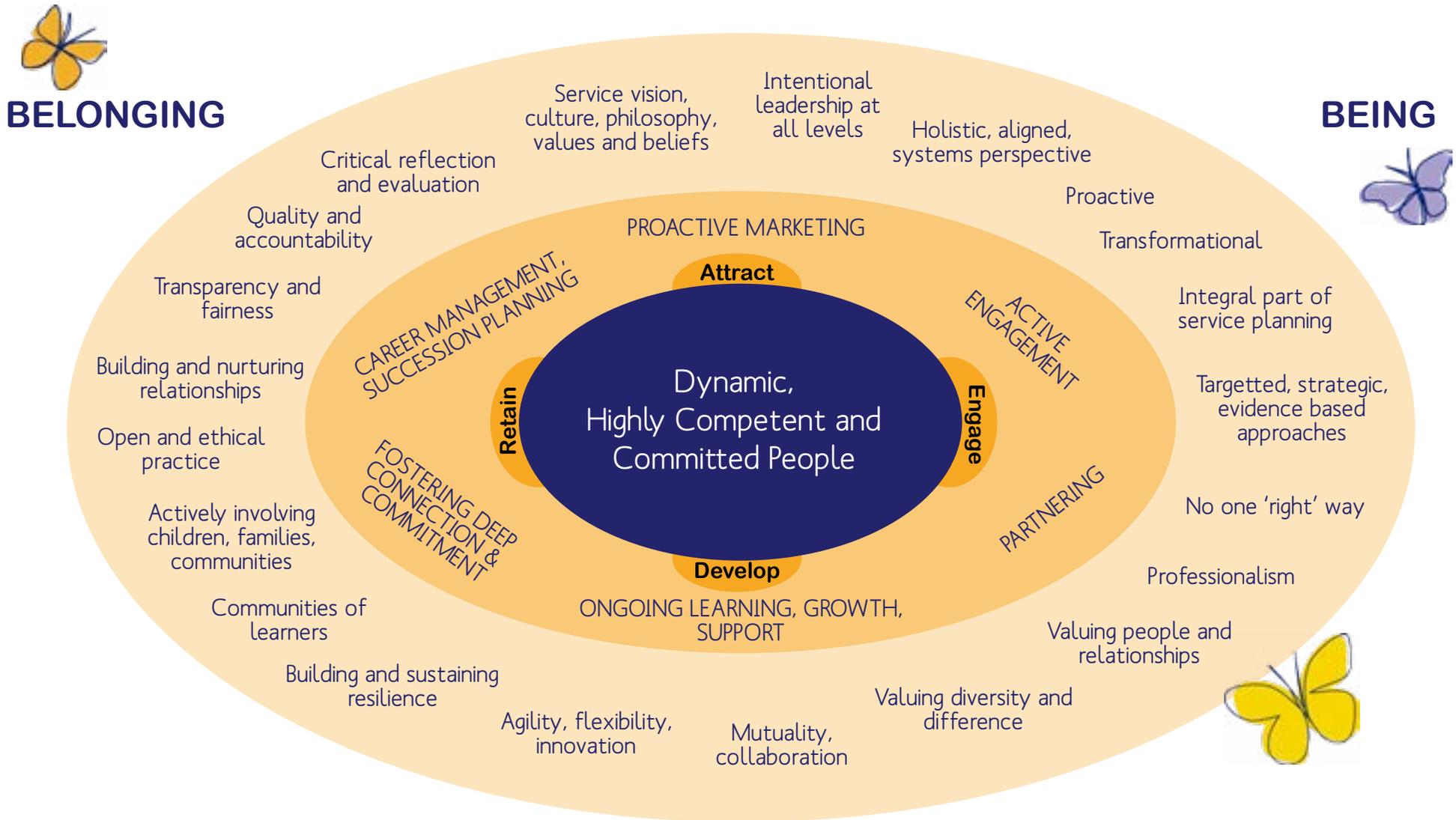
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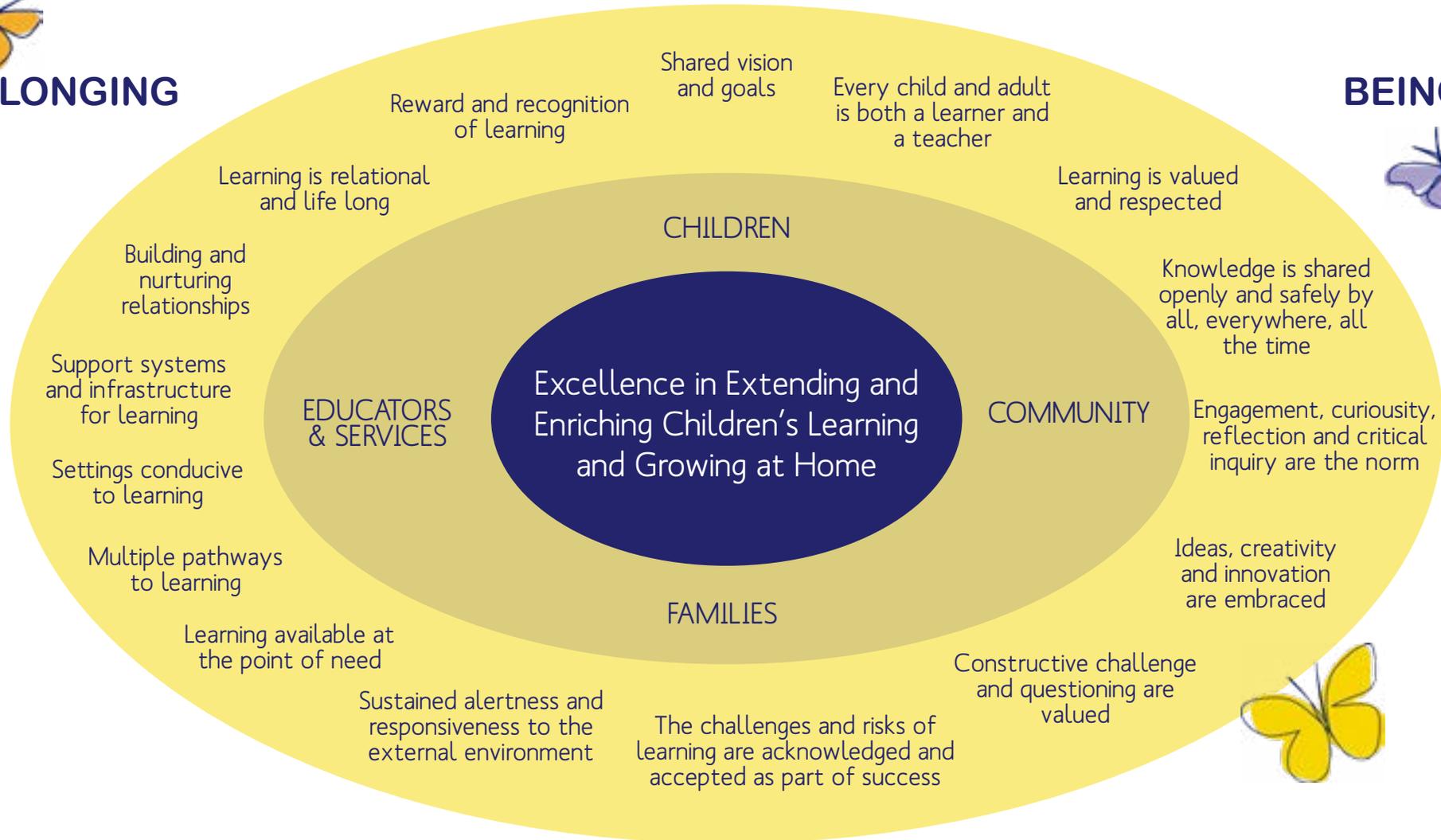
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Learning that is Engaging and Meaningful, and Builds and Sustains Success



BELONGING

BEING



Agility and Continuous Adaptation to Complex, and Changing Environments and Circumstances

 **BECOMING**

Selection Criteria

1. Meets mandatory requirements as stated under the National Education and Care Services Law and Service's policies;
2. Possesses or has the ability to acquire the knowledge and skills in line with best practice for education and care settings and is able to apply this knowledge and use these skills in a home-based environment.
3. Is able to establish and maintain collaborative and professional relationships with families of children in care, other educators and the coordination unit and is willing to contribute to and participate in creating a positive collective culture within the service.
4. Is able to establish and maintain a successful small business including being able to manage the administrative/financial management requirements, record keeping and ensuring compliance with legislative requirements.
5. View themselves as providing a professional service and recognises that their personal presentation, communication and conduct needs to be of a professional standard when working as an educator.
6. Demonstrates a commitment to the role of educator as a long-term career choice and to the ongoing professional learning that is involved in the role.

Service Specific Requirements:

FDC Services can include those service specific requirements that they believe are important in determining the compatibility of applicants to their service needs. These factors may include for example, expectations about the minimum hours and days educators may be expected to work.



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Educator Role Statement

Overview of Role

Educators are adults who are engaged and supported by the coordination unit to provide high quality education and care in their own home, for children enrolled with the service.

Educators give professional, high quality, developmentally appropriate education and care aimed at meeting each child's individual needs.

Educators value positive relationships with children, their families, other educators and the coordination unit in operating their service as a successful self-employed business.

Educators are passionate about providing professional education and care for children and have an ongoing commitment to their own professional development.

Educators also see the role of an educator as a career choice and have a commitment to longevity of service.



Qualifications/Regulatory Requirements

- Educators must be at least 18 years old.
- Educators homes meet or exceed the Family Day Care Service's safety requirements.
- Educators must have or be actively working towards at least a Certificate III in Early Childhood Education and Care.
- Educators are classified as self-employed, however, they must provide certified education and care in accordance with the National Education and Care Services Law, National Education and Care Services Regulation, National Quality Standards, Early Years Learning Framework and/or Framework for School Age Care and abide by the Services' policies and procedures.
- Educators must have and maintain current approved first aid, anaphylaxis and emergency asthma management qualifications
- Working with Children Check for Educators and all adult members residing in the home.
- Public liability insurance for a home-based business.
- Educators must have a medical certificate that certifies them as fit to undertake the duties of an educator.



Experience, Knowledge and Skills

EXPERIENCE:

Have previous experience providing care to children, preferably in a professional context, or considerable personal experience caring for children, with a commitment to acquiring and applying current best practice in professional high quality education and care.

KNOWLEDGE:

Possesses or has the ability to acquire knowledge of childhood development and learning at a minimum Certificate III level qualification in Early Childhood Education and Care.

Possesses or has the ability to acquire knowledge of administrative and legislative requirements of operating a small business.

SKILLS:

Professional Childhood Education and Care – Is able to engage children in affirming and respectful ways that encourage their sense of belonging, helps them seek and make meaning of their world and empowers their learning and growth, taking into consideration children's individual differences in ability, personality, interests, cultural or linguistic background, learning and motivation.

Establishing and Maintaining Interpersonal Relationships – Able to develop constructive and collaborative working relationships with the families of children in care, other educators and the coordination unit, and maintain them over time. Able to support the educator's own family to provide an education and care environment that is welcoming and treats all children and their families fairly and respectfully.

Small Business Management – Able to provide individualised customer service to the families of children in care, as well as manage financial and record keeping requirements, tax compliance and maintenance of required insurances.

Professional Practice Skills – Able to demonstrate professionalism including maintaining accurate records and documentation, demonstrating the use of reflective practice, engaging in ethical decision making, and maintaining professional boundaries including privacy and confidentiality requirements.

Personal Characteristics

- Is able to demonstrate a genuine interest in and enthusiasm for engaging children in learning and helping them feel nurtured and valued.
- Is resilient to change and views change as an opportunity for personal and professional growth.
- Is physically and psychologically resilient to the demands of providing professional and high quality education and care for children in a home-based environment.
- Is invested in building positive relationships with other adults.
- Is committed to, and values professional development and is an active participant in their own learning.
- Values family Day Care as an education and care option and represents family Day Care positively to families of children in care and to the broader community.



General Responsibilities

- Is able to meet all regulations set out in the National Education and Care Services Law and Regulation.
- Is able to implement all Service policies including the ongoing maintenance of a safe environment, maintenance of all documentation required under legislation and Service policies, including risk management plans and home safety visits.
- Implement and maintain the National Quality Standards, and the Early Years Learning Framework and/or Framework for School Age Care.
- Provide an education and care environment in which children experience learning that is engaging and that enables them to experience belonging (acknowledging their interdependence with others), being (supporting children to be, to seek and make meaning of their world) and becoming (supports the rapid and significant change that occurs as children learn and grow).
- Take action to inform and work with the coordination unit on observing signs of learning, emotional or developmental challenges in children and when identifying that the child's safety and wellbeing has been compromised.
- Maintain a written document that includes assessment of learning and experiences that are provided for the children in care.
- Active commitment to developing and actively participating in a formal Professional Development Plan and undertaking training and development as required to ensure goals are met.
- Maintain accurate records and documentation as required.



Appendix

Comparison of Cost between large and small services

The representative data utilized for this example is based on actual service financial evidence. The two services represented operate within 100km of each other to support similar geographical context.

The aim is to demonstrate the impact by stipulating the size of a service by number of educators and therefore utilization of education care. The figures demonstrate a service with under 35 educators and a service over 35 educators and the impact on viability.

Figure 7.2 Service Size Comparison, outlines that percentage of expenses are higher for the small service. This is caused by economies of scale not being achieved, the small service therefore ends with a deficit. In terms of dollar value, it may not appear to be a large dollar figure, however when considering the total budget that the small services operates with, these changes will mean the difference between staying open or having to close operation all together.

Figure 7.2 Service Size Comparison

Type of Cost	Small Service		Large Service	
Administration	\$14,189	16.38%	\$33,872	9.88%
Property	\$3,751	4.33%	\$41,296	12.05%
Motor Vehicle	\$2,108	2.43%	\$3,679	1.07%
Employee	\$68,851	79.47%	\$252,920	73.77%
Surplus /(deficit)	\$(2,258)	-2.61%	\$11,068	3.23%
	\$86,642	100.00%	\$342,835	100.00%

It is important to note that there are fixed cost components under each category of expenses that will remain the same irrespective of the number of EFT for each service.

Some of these costs are:

Administration costs: internet costs, telephone rentals, business name registrations, annual lodgment fees with company's office, registration cost for FDC, membership fees, governance cost, insurance, etc.

Property expenses: rates, security monitoring costs, some part of electricity bill that is a fixed charge.

Motor Vehicle: Cost of lease/repayment, registration and annual insurance

Employee remuneration: some parts of wages will be fixed. E.g. the time it takes to complete certain tasks like looking for best deal on insurance every year, annual renewals to be done with

ASIC/office of fair trading, quarterly BAS and superannuation, annual audits, reporting and compliance in the area of early childhood i.e.: Rating and Assessment, development of policies and procedures, Quality Improvement Plans.

Appendix

Costs associated with the recruitment, induction, support and monitoring of an Educator.

The type of costs associated with supporting an educator are:

Direct Cost: Those costs that can be easily seen for example: recruitment and induction of a new educator, visits to the educators, supporting with calls to the educator, professional development and training of educators, referral and matching of families, parent enrolment interview, Policy and Procedure development and review,

In Direct Cost: In general these are costs in providing office administration and property expenses like computers, furniture and equipment, lease of copiers, governance costs, accounting fees, printing and stationery, rent, repairs, telephone, insurance, utilities, professional development of coordinators. Community and professional networking

In considering the cost of supporting an educator, figures represent services located in Major City, Inner Regional and Outer Regional.

Figure .1 Cost to support individual educators per annum

	Major City	Inner Regional	Outer Regional
No. of educators	56	74	44
Cost per educator	\$8,009	\$7,578	\$7,540
Amount to be recovered from each educator	\$7,644	\$7,265	\$7,392
Current *FTE coordinators available	2.58	3.83	1.99

*FTE Full Time Equivalent

Cost per educator represents the total cost being spread equally amongst all educators regardless the amount of hours and utilisation of care. Services may have other income for example: training/enrolment/registration fees which reduces the amount to be recovered by hours of care provided. Thus the amount to be recovered from the educator is less as indicated in the table above.

The data set collected is based on actual service financials. These services have received either a meeting or exceeding NQS rating.

Suppose, that a change now requires that 1 FTE coordinator can manage only 15 educators or 10 educators. This means recruiting more coordinators as calculated in the table below.

Figure .2 Full Time Effective Coordinator based on recommended ratio's.

	Major City		Inner Regional		Outer Regional	
	1:15	1:10	1:15	1:10	1:15	1:10
No. of educators	56	56	74	74	44	44
Current FTE coordinators available	2.58	2.58	3.83	3.86	1.99	1.99
FTE Coordinators required to meet new requirements	3.73	5.60	4.93	7.40	2.93	4.40
Increased number of FTE Coordinators required	1.15	3.02	1.10	3.57	0.95	2.41

The table below illustrates costs that will increase annually as a result of these changes.

Figure .3 Increased costs associated with recommended ratios

	Major City		Inner Regional		Outer Regional	
	1:15	1:10	1:15	1:10	1:15	1:10
Wages + on costs	72,173	188,878	69,047	223,264	59,175	150,872
Computer maintenance +	1,000	3,000	1,000	3,500	1,000	2,500
Office equipment, desks, staff amenities	1,000	3,000	1,000	3,500	1,000	2,500
Increased rent	3,000	5,000	3,000	5,000	3,000	5,000
Annual increased cost	77,173	199,878	74,047	235,264	64,175	160,872

There will be one-off cost to be factored as part of increased ratios. With the additional staff members the service may need to make adjustments for example: look for new office space to accommodate additional staff, wages plus on costs, computers, desks and office equipment and other resources required to provide to employees.

Figure .4 One off costs associated with recommended ratios

	Major City		Inner Regional		Outer Regional	
	1:15	1:10	1:15	1:10	1:15	1:10
Manager's time in managing the above process (Refer Note 2)	1,500	3,000	1,500	3,000	1,500	2,500
Property Cost (Refer Note 3)						
Pay of breaking of lease	3,000	3,000	3,000	3,000	3,000	3,000
Relocation cost, removalist etc	2,500	2,500	2,500	2,500	2,500	2,500
Fit out for the new office	3,000	5,000	3,000	5,000	3,000	5,000
Loss of personnel time (Refer Note 4)	6,000	6,000	6,000	6,000	6,000	6,000
Total Cost to be budgeted for	14,500	16,500	14,500	16,500	14,500	16,500

Note 1: The wage rate considered is current wage rates under the Social, Community, Home Care and Disability Services Industry Award 2010.

Note 2: Managing the process, planning to comply with the changes, seeking committee approval, advertising, recruitment, inducting new staff at minimum would add a further estimated 38 hours of work.

Note 3: It is assumed that the service does not have sufficient space to accommodate additional person in the office and that they may need to consider moving to a new office location.

Note 4: Meetings for planning ahead, educator meetings, looking for new space, moving and all the logistics around this. This has been estimated to be equivalent to about 1 weeks of time.

Appendix

Wages for Co-ordinators

The report makes reference to the average wages of \$46,000 per co-ordinator per annum. It is unclear how these figures have been calculated.

With reference to Clause 16.3 of the Social, Community, Home Care and Disability Services Industry Award 2010, the minimum wages for FTE coordinator is summarized in the table

Employment Level (based on skills and experience)	Minimum weekly wages (as per award)	Annual Wages	On Costs	Total Remuneration
Pay Point 1	888.6	46,199	6,930	53,129
Pay Point 2	916.4	47,661	7,149	54,810
Pay Point 3	944.5	49,123	7,369	56,492
Pay Point 4	970.4	50,467	7,570	58,037

On costs includes the superannuation, leave loading, workers compensation premiums, minimum professional development required to be completed by employees.

These are the minimum costs that a service incurs. Employers may remunerate at a high level as they seek to attract a 3 to 4 year trained staff member with substantial experience in order to respond to the complexities of the role of coordinator.