



19 April 2023

Att: Hon. Julia Gillard AC
Royal Commission into Early Childhood Education and Care
via email to RoyalCommissionECEC@sa.gov.au

Dear Commissioner Gillard and Commission Staff

Submission to the Royal Commission into Early Childhood Education and Care on behalf of the Orroroo Childcare Working Party (representing the Orroroo/Carrieton community)

We would like to thank you for the opportunity to provide this submission into the Early Childhood Education and Care (the Commission).

Orroroo is located approximately 3.5 hours' drive north of Adelaide and is one hour east of Port Augusta. Established on the marginal-country frontier (right on Goyder's Line), the Orroroo community is constantly challenged by inconsistency of seasons and extreme weather events. Surviving and prospering amidst drought has tested the generations of this community. However, innovation, sheer grit, determination and resilience is what has underpinned the development and continued success of our agriculture industry for over 150 years. According to the 2021 Census, the estimated resident population of the District Council of Orroroo Carrieton (DCOC) is 891 with the district covering 3,325 square kilometres. We have seen an increase in young people returning to the district to start their families, which presents us with one of our biggest challenges. ABS Census Data suggests that for the DCOC area there has been an increase of nearly 45% in children aged 0-4 years between 2016 and 2021. We have many members of the community who are actively willing to join or re-join the workforce, however are restricted due to a lack of access to childcare. This presents us with a number of problems, both social and economic. Considering the skills shortage in health and education in particular, this further compounds the issues of our district, somewhat ironically many that have no access to childcare have the education and experience required in these skill shortage sectors.

DCOC falls within the Federal electorate of Grey, known as the electorate where access to childcare is the worst in the country (Deserts and Oasis: How accessible is childcare in Australia, Victoria University, 2022). We note the recent increase to the childcare subsidies however our residents can simply not access placements, regardless of the increased subsidy. Presently families within the DCOC catchment have the following limited childcare options available to them:

Occasional Care (OC) – provided by Orroroo Area School (OAS): 3hrs, Thursdays between 9am and 12pm for 2 year old to pre-school age. Currently have capacity to offer up to 8 places each Thursday, 16 children require OC so current children have access in fortnightly rotations (2 groups of 8). Only available in school terms.

Remote Creche - Remote and Isolated Children's Exercise (RICE) – offer care 1 day a week, Monday between 8:45am and 3:15pm for up to 19 children. Families are able to claim the Child Care Subsidy (CCS) if family meet eligibility criteria. Only available in school terms.

In July 2022, we surveyed the DCOC community (with the help of the Regional Development Authority Yorke and Mid North RDAYMN) to gauge the current need for childcare, the participation rate of this survey was high and is indicative that childcare, or lack of, in Orroroo is a serious issue for families.

Summary of the August 2022 Orroroo Childcare Demand Survey

Highlights

- 35 responses, covering 75 children.
- Demand for long daycare childcare services averages approximately 12 places
 - Year-to-year variability is high reflecting the (relatively) small catchment population and swings in birth rates year-to-year
 - A degree of substitution between care types would be anticipated, meaning the number of places demand in aggregate could see substitution towards available service types.
- Demand for out of school hours care (OSHC) averages approximately 21 places.

Operating

- Average hours of care demanded for long daycare services was 19.6 hours per week, and 11.7 hours for OSHC (these are slightly lower and slightly higher respectively compared with other surveys undertaken in the Yorke and Mid North region recently).
- On preferred hours of operation, median opening and closing times were 8:00AM and 6:00PM respectively
- The median price per hour respondents were willing to pay (before subsidies) for long daycare services and OSHC was between \$12.50 - \$15.00 an hour (slightly higher than other recent surveys)
- 52.9% of respondents indicating they could be flexible around days accessed based on availability (although the response rate for this question was only 50%).

Economic impacts

- 71.4% of respondents would either start working, increase the hours they work or commence study if they had access to childcare services.

The Childcare Working Party (CCWP) was established in August 2022 as a response to the survey and regular meetings have been held since this time, including a strategic planning day facilitated by RDAYMN. The CCWP is made up of key stakeholders, including the Principal of Orroroo Area School, the EO/DON of the Orroroo Health Service, a representative of the Health Advisory Council Mid North, Director of the Remote and Isolated Children's Exercise (RICE), CEO DCOC, Grant Officer and Councillor from DCOC, along with seven community representatives. We have looked at finding solutions to the dearth of childcare in Orroroo but have encountered no end of road blocks. Time again we find that due to our size, we don't neatly fit into any category, or that the program that could offer the best solution is no longer available (Rural Care).

What childcare in Orroroo would mean for the community:

- Children's development – By valuing that every child deserves access to play-based learning and the vital role it plays in the healthy development of small brains and their life-long learning and well-being journey (<https://thrivebyfive.org.au/>) we ensure that our children receive the best start in life. It would go some way to ensuring equity in educational outcomes for rural and remote children.

- Workforce participation - Women’s participation in the workforce would increase (as shown by the survey results). A recent study shows regions with lower access to childcare have lower levels of workforce participation in women who have children under five years of age (Deserts and Oasis: How accessible is childcare in Australia, Victoria University, 2022 <https://www.vu.edu.au/mitchell-institute/early-learning/childcare-deserts-oases-how-accessible-is-childcare-in-australia>). According to Workplace Gender Equality Agency (<https://www.wgea.gov.au/publications/gender-equality-workplace-statistics-at-a-glance-2022>), women’s superannuation at retirement age (60-64) is around 23% lower than their male counterparts. Access to childcare in Orroroo would help address both participation and gender superannuation equality, providing women with greater financial security.
- Wellbeing – it would provide primary families, children and carers with the opportunity to foster social connections outside of the family unit. It would enable carers to take time to look after their own mental wellbeing.
- Economic – currently we have skilled staff living in adjacent rural towns and travelling to work each day (100km round trip) as they can only access childcare in the adjacent towns and not Orroroo. We in turn miss out on the benefits of having that small family living, working, socializing and spending locally, this affects the sustainability of other services in the town. Key industry, such as the Health Service, small business and agricultural enterprises have trouble attracting staff due to the lack of childcare. Often women who marry into farming families leave a skilled profession, such as teaching or nursing, to relocate to Orroroo. The lack of childcare means they can no longer participate in the workforce, even though the industry is suffering staff shortages. Often they do not have family support that can help them, leaving them feeling isolated and unsupported negatively impacting their mental wellbeing. The CCWP are confident that if we can secure access to appropriate childcare, it will help to unlock future economic growth within the DCOC catchment area.



We believe the following options are best suited to our small community:

1. Rural Care - This is probably best suited to our childcare demand profile.

- Only 17 Rural Care (RC) places exist in South Australia. We have been notified that the Department for Education is currently **not** expanding this program to new towns, unless a current Rural Care location moves to larger childcare model and a place becomes available. The chances of a small town 'giving up' the rural care service is extremely small.

Recommendation: State Government and Department for Education to increase number of Rural Care Models in small rural communities such as Orroroo, to address childcare demand where no appropriate childcare exists

- The number of rural care workers and therefore places allocated to the rural care program is dependent on: the physical capacity of the site, the number of children enrolled in the preschool program, and demonstrated demand financial viability of the program. Capacity of the Kindergarten building at the Orroroo Area School is a barrier to Rural Care model providing a solution to childcare demand. **Recommendation: targeted funding to increase capacity at small rural schools to meet childcare demand where no adequate childcare exists.**
- Availability of qualified rural care workers presents a further barrier to the Rural Care model being implemented, should new places become available.

Recommendation: further investment into the attraction and retention of suitably qualified staff to work rurally.

2. Family Day Care –

- We have had several potential family day care educators withdraw from the application process due to a number of reasons. Lack of funds to bring a suitable venue up to standard has been highlighted as a barrier in two instances. One potential FDC educator, who was able to operate as a FDC educator in New South Wales, was unable to in South Australia as she had not completed her Certificate III in Early Childhood Education and Care, however in New South Wales she was able to practice as 'working towards' completing the Certificate III in Early Childhood Education and Care was sufficient. Both potential family day care providers have since gone on to pursue other work opportunities, which sadly represent further opportunities missed for our community.

Recommendation: Consistency of interpretation of FDC legislation across state/territory borders

- Our community (through the CCWP) are proactive in finding childcare solutions, including fundraising and grant applications. We have sourced a location, have permission from owners, and have begun investigating ways to improve the site to meet 'in-venue' Family Day Care requirements. Our community are going to great lengths to pursue this as a solution to our childcare requirements, where the State/Federal governments have not been willing or able to. The goal is to provide an approved FDC 'in-venue' site for an approved FDC educator to operate from. It takes away many of the barriers that the FDC educator faces in establishing themselves in a community. We intend to come to an arrangement where providing care will be relatively cost neutral to the FDC Educator (via funds raised by the CCWP and Council/Community support), minimal rent would be an example of this. a simple

solution would help us further and make the model more sustainable would be a simple change in the legislation that governs FDC, to allow more than one FDC educator to operate out of the approved 'in-venue' site at the same time. Current legislation prohibits this occurring, a minor adjustment to the legislation and or the interpretation would allow our community to help ourselves to gain increased childcare provision, at zero cost to Government(s).

Recommendation: change to Education and Care Services National Regulations (2011 SI 653) - NSW Legislation to allow more than one family day care educator to operate from an approved 'in-venue' site at the same time in disadvantaged regional and remote areas of Australia where there is an absence, or limited supply, of Centre Based Day Care or Family Day Care services* as follows:

**'...in disadvantaged regional and remote areas of Australia where there is an absence, or limited supply, of Centre Based Day Care or Family Day Care services...' This specific wording has been taken from the Community Child Care Fund (CCCF) – Establishing child care in limited supply areas new grant opportunity information.*

Current legislation:

EDUCATION AND CARE SERVICES NATIONAL REGULATIONS - REG 124

[Education and Care Services National Regulations \(2011 SI 653\) - NSW Legislation](#)

Number of children who can be educated and cared for--family day care educator

124 Number of children who can be educated and cared for--family day care educator

(1) A family day care educator must not educate and care for more than 7 children at a family day care residence or approved family day care venue at any one time.

(2) In determining the number of children who can be educated and cared for by a family day care educator for the purposes of sub regulation (1)--

(a) no more than 4 can be preschool age or under; and

(b) if the children are being educated and cared for at a residence, the educator's own children and any other children at the residence are to be taken into account if--

(i) those children are under 13 years of age; and

(ii) there is no other adult present and caring for the children.

(3) No more than 7 children can be educated and cared for as part of a family day care service at a family day care residence or an approved family day care venue at any one time

Suggested amendment to the legislation:

We think we would need to request that the above regulation (Reg 124) includes an additional section under REG 124 as follows:

(***new**) in disadvantaged regional and remote areas of Australia where there is an absence, or limited supply, of Centre Based Day Care or Family Day Care services an exception to (1), (2) and (3) exists as follows:

(1) Two family day care educators must not educate and care for more than 14 children at an approved family day care venue at any one time.

(2) In determining the number of children who can be educated and cared for by a family day care educator for the purposes of sub regulation (1)--

(a) no more than 8 can be preschool age or under; and

(b) if the children are being educated and cared for at a residence, the educator's own children and any other children at the residence are to be taken into account if--

(i) those children are under 13 years of age; and

(ii) there is no other adult present and caring for the children.

(3) No more than 14 children can be educated and cared for as part of a family day care service at an approved family day care venue at any one time

Benefits of changing FDC 'in-venue' legislation:

- Provides a cost-effective solution to the Government to cover childcare demand in small disadvantaged rural communities where no appropriate childcare exists. It strikes us as remarkably unfair that rural communities must continually do all the leg work (volunteering/financially) to provide solutions to issues such as childcare because it is easier to let us fall through the cracks than support us. As mentioned previously, childcare is not going to be a profitable venture that attracts providers to small rural communities, but that does not mean we do not deserve to be supported in providing it. Metropolitan families are not required to invest volunteer time and resources to provide themselves with childcare solutions.
- Provides FDC educators with support, in what is known as an isolating role.
- Provides the community with an approved and regulated care model that covers the demand profile for childcare.

3. Other recommendations to address our barriers to childcare:

- Funding – specific funding for small rural towns where no appropriate childcare exists, to enable solutions to address the lack of childcare. This could be achieved by better utilizing government facilities by investing in rural schools to enable them to increase capacity to offer additional Rural Care sites (beyond the 17 current SA sites), or to help communities make improvements to facilities for 'in-venue' FDC sites for example.
- Childcare Solutions that are adaptive to each individual community, not a blanket approach that sees small rural communities fall through the gaps time again. Must meet community needs and expectations, as opposed to having an unsuitable, metro specific childcare model forced onto them.
- Training for the Education Standards Board and Office for the Early Years – specific to rural situations to better help small communities that don't fit regular childcare models. Just because we don't fit, doesn't mean we don't need specific and appropriate advice/help.
- Attracting and retaining skilled, compassionate and dedicated workforce for ECEC services, including offering incentives to work and stay rural.

What this submission does not address is the financial barriers families face in accessing childcare. It is important for the Royal Commission to recognise that many rural and remote families, such as those in Orroroo, do not have the luxury of complaining about rising childcare fees, as put simply, they do not have access to childcare, yet they collectively pay for those fortunate enough to access childcare to receive an increase in their Child Care Subsidy (CCS) rate. In summary, where you live shouldn't determine your educational outcomes. Childcare in small rural and remote towns is unlikely to be a largely profitable

venture for any provider, but that doesn't mean access to childcare should be abandoned in our communities. Agriculture and the regions provide great economic benefit to South Australia, along with providing food security for the nation. In turn we ask for support to help grow our economies, and by providing appropriate and adaptable childcare solutions, we believe this will give us the capacity to unlock our potential.

We would be more than happy to discuss this submission with the Commission, Review staff or other policy makers further. Please contact me on [REDACTED] should you require further information.

Yours sincerely,

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On behalf of the

Orroroo Childcare Working Party