



COMMUNITY CHILD CARE CO-OPERATIVE
LTD. (NSW)

ABN 81 174 903 921

Children's Services Regulation Review
Children's Services Directorate
NSW Department of Community Services
Locked Bag 4028
ASHFIELD NSW 1800

11/12/08

Please find below Community Child Care Co-operative's response to the Children's Services Regulation Review discussion paper.

Thank you for the opportunity to comment on these important policy changes.

Yours faithfully,

A handwritten signature in black ink that reads "C Lymbery". The signature is written in a cursive, flowing style.

Carol Lymbery
CEO
Community Child Care Co-operative

Community Child Care Co-operative (NSW) is a 30 year old not-for-profit organisation that promotes, supports and advocates for quality children's services, meeting the needs of children, their families and the community. We are a peak organisation in NSW representing over 1300 children's services, families and individuals. We have consulted our members widely in preparing this submission.

We endeavour to:

- provide leadership which empowers the decision makers within children's services.
- identify service provision gaps and needs, and proactively target resources to these areas.
- support and collaborate with other children's services providers who reflect similar philosophical beliefs.
- embrace the value of difference and debate.
- be efficient and sustainable in the use of resources.
- be a role model for best practice in corporate governance and organisational operation.
- be a respected corporate citizen and a positive force in the community.

Although Community Child Care Co-operative represents services in all areas of the children's services sector, our members are predominantly community based long day care services and community based preschools.

Our submission thus predominantly reflects the views and interests of these two groups.

Strong Regulation of Children's Services needed

Community Child Care Co-operative believes in the strong regulation of children's services in NSW. We believe that NSW needs:

1. A Regulation that increases the demands on services for quality service provision.
2. A Regulation that reduces the burden on children's services. Less paperwork, less compliance focussed with clear interpretation which results in fewer breaches.
3. A Regulation that is clear and provides definitive direction.

Community Child Care Co-operative provides specific support to children's services and their interaction with the Regulation in a number of ways, primarily through:

- Provision of in-service and nationally accredited training;
- Provision of a call centre funded by the Federal Government for all children's services to access with queries about the operation of children's services in NSW;
- Provision of individual service support to services facing specific issues;

- Provision of resources to assist services in operating quality children's services in NSW.
- Provision of consultancy services for individual services, groups of services and new or proposed services; and
- Requests for advocacy on behalf of individual members or children's services as a whole.

We believe that the above roles give us a unique insight into both the operation of the existing Regulation and the possibilities for Regulation in NSW. Our staff and our consultants visit hundreds of services every year and have telephone and email contact with hundreds more. We witness the Regulation's operation in practice in both private, corporate, community based and council run centres. We assist services that have breached the Regulation, and assist services in developing policies and procedures to comply with the Regulation.

Identified concerns with the existing Regulation

From the above interactions with services Community Child Care Co-operative identifies the following as the primary areas of concern with the existing regulation:

- **Inconsistency of interpretation.** Community Child Care Co-operative have long pointed out that services are subject to different interpretation of the Regulation by different officers of the Department and at different times. This makes services attempts to abide by the implementation difficult. A regulation that is clearer and less open to individual interpretation will assist in achieving the stated aims of regulating children's services. A Regulation implemented with intensive ongoing training of Children's Services Advisers, would also be more likely to be consistently interpreted.
- **Inadequate weighting of components.** A service can currently be breached for having out of date band aids or for having less than the required numbers of staff. There is no guidance in the Regulation as to which breach is more likely to place children at risk. A Regulation that demands compliance in too many areas is less likely to succeed in protecting children's safety and contribute to positive outcomes for children in services.
- **Minimum standards need to be higher.** The sector is constantly told that the Regulation only outlines minimum standards. Some services may never provide more than the required minimum standards. Because of this factor, it is crucial that the standards that are set by the Regulation require services to deliver a level of quality education and care to that is recognised as optimal for children's wellbeing.
- **Out of step with research.** The research is clear in key areas such as group size, ratios, staff qualifications. The requirements under the Regulation need to reflect the research about what is needed to deliver quality care for children.

- **Too much focus on health and safety at the expense of focus on positive outcomes for children.** We know that health and safety of children in children’s service is important, but we also now know that children’s experiences in the early years of their life affect the very way their rapid brain development. The Regulation needs to give as much weight to areas that affect positive outcomes such as ratios, staff qualifications, curriculum and programming as it does to health and safety issues.
- **Lack of user friendliness as a document.** Community Child Care Co-operative has recognised that children’s services staff are not as familiar with the Regulation as they optimally could be. CCCC’s staff often guide service staff to the appropriate section of the Regulation covering various activities. Clear subheadings, clearer formatting, indexing etc, would assist in user friendliness and useability.
- **Ambiguity.** The Regulation in some areas is ambiguous, particularly in areas where it references other documents or requires compliance with other legislation. The classic example of this is the requirement under section 68 that services must develop a policy that is consistent with the Dietary Guide for children. This is defined later in this section as being a booklet - Caring for Children—Food, Nutrition and Fun Activities. Regardless of the booklets’ quality, a Regulation should not refer to something intended as a resource document only, and which may or may not be in print and available during the life of the Regulation.
- **Inability of services to appeal interpretations.** Because the Regulation is open to interpretation there needs to be mechanisms by which services can appeal breach notifications. At the moment too much relies on the interpretation of the departmental officer who has determined a breach. If the service believes it is complying with the regulation there needs to be a way for them to request a review of the breach and the issuing officer’s interpretation of the relevant section of the Regulation.
- **Breaching is a blunt instrument.** Services are either breached for minor infringements of the Regulation or prosecuted for major ones. We support the recommendation for measures in between these two extremes.
- **The licensee process is too hard for community based committees.** Community based services need to make it easy for parents to take on the task of becoming a member of a management committee and the role of licensee. The current requirements for changes in committee documentation and in re-licensing are too onerous, and should be limited to office bearers. The manner in which these requirements protect and reduce the risk to children is out of proportion to the administrative burden in compliance.

Guiding principles for the review?

Community Child Care Co-operative endorses DoCS' guiding principles for the review. We particularly endorse the principles of:

- interventions in proportion only to the risks and positive outcomes for children; and
- removal of unnecessary regulatory burden.

What services should we regulate?

- Community Child Care Co-operative believes that retaining existing coverage and definitions of a children's service, having a separate regulation for OOSH services and not regulating in-home care are sensible moves. It would be inappropriate to cover the needs of older children attending OOSH centres in the same regulation as services for younger children. Community Child Care Co-operative absolutely supports the licensing of OOSH services in a separate regulation. As opponents of the rights of shopping centres to set up unregulated services in the first place, we believe this should go.
- Community Child Care Co-operative has some concerns about exclusion of school orientation programs from the Regulation. More and more private schools are establishing "prep" classes for children prior to school entry. Although we agree that the Children's Services Regulation should not cover orientation classes which operate for small periods of time, "prep" classes which may have four year olds in them for an entire year, are children's services and should be regulated as such.
- Community Child Care Co-operative has some concerns about the use of the proximity of parents determinant to decide if a service should be licenced. In a large shopping centre situation a parent could be on the premises, but up to a kilometre away from the child.

Ratios, group size and maximum child numbers

- Community Child Care Co-operative believes that the following ratios and group sizes should be required of children's services in NSW.

| Age | Staff:Child Ratio | Group Size |
|---------------|--------------------------|-------------------|
| Birth-2 years | 1:3 | 6 |
| 2-3 years | 1:5 | 10 |
| 3- 6 years | 1:8 | 16 |

- We are exceptionally pleased that the NSW Government has decided to introduce a 1:4 ratio for 0-2 year olds in children's services in 2010 when the new Regulation comes into effect.
- We believe it is important that the 1:4 requirement be introduced to replace the current ratio as soon as the new Regulation takes effect. Services have 18 months to prepare for the new ratio and no more time needs to be allowed for phased implementation. We do believe that smaller services require resourcing to enable them to determine the best way to introduce the ratio in their service and Community Child Care Co-operative is happy to work with DoCS in providing this resourcing.
- Community Child Care Co-operative is strongly opposed to the targeted approach or the flexible age range approach for implementation of the new ratio as canvassed in the Regulation Review discussion paper because it would be impossible to regulate and undermines the intention of the recommendation.
- Community Child Care Co-operative believes that comment on the ratios in Family Day Care is better made by NSW Family Day Care Association, but believes children need optimal ratios regardless of care type.
- Community Child Care Co-operative believes group size is important in the delivery of quality care and the provisions should be retained in line with ratios for all age groups, and the definition of "group" is strengthened.
- Community Child Care Co-operative is unaware of any research that states that the total number of children within a service affects the experience of children in that service either positively or negatively. Because of this, we feel unable to comment on suggestions that

maximum number of children requirements be expanded or removed. However, we do not believe that allowing services to have a 5-10% increase in their total licenced numbers across the year is suitable. A service needs to be licenced for a definitive number of children. Flexibility in each age group numbers (i.e. expressing the number of children permitted in each age range) would give the desired outcome of allowing services to accommodate the movement of children across age groups.

- Community Child Care Co-operative applauds the suggestion of requiring that a service undertake a risk assessment prior to excursions. Requirements for excursions should be in the one clause and required ratios should be less open to interpretation. Community Child Care Co-operative receives many phone calls from services trying to determine the ratios that are required for particular excursions. Community Child Care Co-operative is aware that many services have reduced the number of excursions they conduct because of safety fears. This is not in the best interests of children and it may be possible for this to be reversed by clearer regulatory requirements.

Qualifications and roles of staff

- Community Child Care Co-operative believes that it is vital that the staffing requirements of the NSW Regulation be retained and strengthened. The research on quality child care provision is clear, more qualified staff means higher quality care.
- We believe that a Certificate III should be a minimum entry level qualification for all service types. We believe that existing staff should be given recognition pathways to achieve this qualification, but all staff should be required to obtain a Certificate III within 3 years of the Regulation's implementation date.
- We believe all contact staff should be required to have First Aid and Child protection Training.
- We believe that every service, regardless of service size, should be required to employ a university trained teacher as a primary contact staff member for every 20 children or part thereof. We believe that many services are created at 29 places to reduce the need for a teacher. We do not believe it is in the interests of children that the quality of education and care they receive is dependent on the size of their centre.

- We believe that the requirements for staff qualifications for children under two years need to be strengthened, by requiring a university trained teacher for this age group.
- We believe that all teachers should have 4 year university qualifications, and that existing teachers should be encouraged and assisted to become 4 year trained.
- We believe that the role of the teacher/s within a centre as pedagogical leaders needs to be made more explicit in the Regulation.
- We believe that all the staffing changes above are necessary, but changing the requirements to employ a teacher in all services are the most fundamental to bring about improved quality care to all children.

Safety, Health and Development of Children

- Community Child Care Co-operative heartily applauds the Department for recognising that. "...parts of the Regulation are unnecessarily complex and hinder clear interpretation and compliance, precisely where a clear and unambiguous regulatory approach is essential." Community Child Care Co-operative supports proposals that will result in a streamlined and simplified regulation.
- Community Child Care Co-operative believes that an outcomes approach for Sections 3 (Facilities and Equipment) and sections 6 (Operational requirements) of the current regulation is a positive move but believes that it is also necessary for children's services to be absolutely clear on requirements. Often a more prescriptive approach can reduce the burden of regulation by giving simple yes/no answers to a service's question: "Can we do this, or not?"
- Community Child Care Co-operative believes that by defining the outcome each area of the Regulation is trying to achieve, users of the Regulation will have a greater understanding of why the requirements under the Regulation are needed, and what the intention is.
- Community Child Care Co-operative believes that the suggested outcomes need to be re-ordered so that those concerned with positive outcomes for children are given more prominence than those that are concerned with health and safety. A children's service should not just be required or be seen to be required as a place that ensures children's safety while children are not in the care of their parents. It must be seen primarily as a

place that contributes to children's development and education. The Regulation has a key role in ensuring that licensees and the general community are aware of this fact.

- For this same reason Community Child Care Co-operative considers the concept of outcomes positive, but the wording is used is often deficit wording such as "preventing accidents and emergencies".
- Community Child Care Co-operative believes the existing space requirements of 3.25 square metres inside per child and 7 square metres outdoor per child are the minimum spaces required by children and are strongly opposed to any suggestions that these be reduced, especially for children under 2.
- Community Child Care Co-operative members have identified the following requirements under parts 3, and 6 of the Regulation as problematic:
 - The existing requirements for an onsite laundry. Where services have adequate arrangements for commercial laundering to occur offsite this requirement should be relaxed.
 - Clause 64, Programs for children needs to be rewritten to strengthen the role of university qualified teachers in ensuring adequate programming and in ensuring current pedagogical practice and theory is reflected.
 - Clause 65, interactions with children should also be rewritten in this manner. Particularly in need of review is Clause 3 which needs to be updated to reflect the use of language currently used in early childhood practice around inclusion.
 - Clause 72 about poisonous vegetation needs to be written to specify which plants are considered poisonous. Services Community Child Care Co-operative deal with have often commented about the capacity of individual CSAs to make biased application of this clause.
 - Clause 85 (2) Required policies needs to be updated. Most children's services that are Accredited are required to have additional policies to those listed in the regulation and the policies required again give more bias to health and safety issues at the expense of issues such as inclusion and programming which have the capacity to strongly affect a child's experience at a service.

- Community Child Care Co-operative believes that because children under 2 are more vulnerable to poor quality care, extra guidance in caring for children under 2 within the Regulation is sensible. This is in line with suggested improvements to ratios and increasing the staff qualification requirements.

Compliance, Enforcement and Penalties

- Community Child Care Co-operative supports services on a daily basis who have inadvertently breached the Regulation in a minor way and are stressed by receiving a breach notification. Some of these breaches are for simple issues that could have been pointed out and rectified during the DoCS inspection visit. On the other end of the scale we also come into contact with centres that continually breach the same part of the Regulation, with little compulsion to fix it.
- Community Child Care Co-operative believes introducing mechanisms such as Compliance notices, penalty infringement notices, enforceable undertakings and adverse publicity orders will help address these problems, along with a commitment that no compliance notice will be issued if the breach can be rectified on the spot.
- Community Child Care Co-operative believes that staffing both re qualifications or ratios breaches are the major breach that poses the greatest risks of negative outcomes for children.
- Community Child Care Co-operative believes that increased in-service training about the content, intent and application of the Regulation should be the focus of DoCS compliance efforts. Most services do not deliberately attempt to breach the Regulation, breaches are inadvertent and caused by lack of knowledge and understanding of the Regulation and by complexity in the format of the Regulation.
- Community Child Care Co-operative supports the concept of utilising neutral territory arrangements to deal with more significant or challenging negotiations.

Probity and Related Checks for Licence Applicants

- Community Child Care Co-operative has repeatedly raised with the Department the disincentive effect the licencing and re-licencing process has on attracting people to be part of a management committee.
- We believe that where a licence is held by a committee, as opposed to an individual licensee, the amount of associated documentation required from the individuals on that committee needs to be reduced. We suggest that the office holders (President/Chair/Treasurer) be required to provide full documentation, whilst other committee members should require proof of identity documentation and Screening Consent documentation only.
- The risk to children needs to be balanced against the amount of time it takes a Director to liaise with up to 15 individual committee members for character references, work references, proof of identity documents and copies of qualifications. Having to provide this much documentation dissuades potential committee members from seeking election in many services.
- Community Child Care Co-operative that documentation such as character references may have little value, however, assessment of the Licensee is still important as many licences make significant operational decisions in the day to day management of services.
- Community Child Care Co-operative agrees with the suggestion made in the Regulation Review Discussion Paper that a person prosecuted under the Act should not qualify as a fit and proper person to be a licensee of a children's service.

Licensing Model

- Community Child Care Co-operative believes that children's services should be licenced.
- Community Child Care Co-operative believes that the tests for a new licencing model as outlined in the Review Discussion paper are appropriate, but suggests that the last proposed test "common applicability, as far as practicable, across all service types" have added at the end "and auspice types". It is essential that new proposals are tested for applicability to the community management model where the licensee is a committee, as well as to the private ownership model. Some requirements of the Regulation, especially in the licencing area, are not suited to community based management.

- Community Child Care Co-operative believes that the introduction of a master licence covering all services that a licensee operates is a sensible change, but we would need to feel confident that the information still allows monitoring of compliance at a service level. There would also potentially be implications to work through if one service within the licence has significant breach issues, and the others do not.
- Community Child Care Co-operative welcomes the idea of 5 year licences as long as this is accompanied by high level ongoing monitoring systems of compliance.
- Community Child Care Co-operative cannot see a big advantage in premises registration by non-licence holders. We believe this suggestion would create a market for developers to develop child care centres in areas without establishing the community requirements or needs for such a service.

Introduction of a Licensing Fee

- Imposing a fee for licensing was one of the ideas canvassed in the Regulation Review Discussion Paper. It appears as if the Government has now predetermined the outcome of the consultation in this area.
- By setting the minimum fee so high (\$700), the NSW State Government has left no option to services other than passing the fee on to parents as increased fees. Small community based services run on miniscule budgets and a cost of this type cannot be absorbed.
- Community Child Care Co-operative requests that the Department negotiate with the Government for transforming the announced licence fee scheme to one with a sliding scale based on annual turnover, service size, multi-site operations and auspice model. Also, many organisations provide a subsidised fee for non-profit providers. Every other proposed change to the Regulation has been considered for its possible impact on childcare fees, apart from this one.
- Community Child Care Co-operative consulted our members about the effect of this proposed change specifically, and received more feedback to this request than we have received for any other suggested change in Government action to children's services in the last 5 years. This must be taken as indication of the depth of children's services views on this issue. We have included a sample of this feedback in Appendix 1.

Appendix 1 – Child care services comments on the imposition of Licensing Fees.

We at X Pre-school are a non profit organisation and this fee for a license would impact our parent community negatively.

I believe that services already have huge costs involved in maintaining their services. All Federally funded services are required to comply with the NCAC as it is linked to the child care benefit. This process in itself costs services large amounts of money to ensure that they are complying with this organisation to add to this a fee for licencing would put more pressure on services financially.

We wholeheartedly support CCCC's stand on the proposed introduction of licence fees. Our preschool has already suffered, like hundreds of others, from a reduction in funding. We are struggling to stay viable. We have no option but to pass this licence cost on to parents and this is another big blow on top of what we have already suffered. Too often when new charges like this are imposed, or other charges increased, it is stated that the charge will only reflect as another 20c a day for parents. But add them all together & we end up with a figure in the dollars!

There is a limit to what families can bear!

Fees would have to be increased to cover - keeping our fees low is a priority as we compete with 3 DET preschools. If fees were not increased money would have to be found by cutting back on expenditure (already at min).

A licence fee would be passed onto our parents as an increase in their fees. We attempt to maintain the high standard of care that the children enjoy receiving, that the parents expect and working conditions that the staff expect and enjoy when setting our budget each year. With these aims in mind while we also try to keep the fees as low as possible for our parents. An increase in fees will mean our families will struggle to pay their fees.

The \$700 licence fee for us per year (small 20 place centre) will have to be passed on to families and will then result in another fee increase. At present we have already been running at a small deficit every month for 2008.

X Preschool Kindergarten Strongly Opposes implementation of a licence fee. If they want to charge someone charge the for profit sector!!!!

We are very angry at this cost

Whilst I understand there is a black hole in the government's funding this fee is ridiculous. I find it hard when DOCS are moving to centralised licencing that they cannot meet these costs.

The inferior money going to State preschools means choice is being taken away from parents and costs increasing.

High quality committed private providers like ourselves do not want to increase fees and we would not be able to absorb this cost.

We will support any action to mark our disapproval!!!!!!

We are a private centre and even at full capacity, our costs are ever increasing. We are certainly not in childcare 'in order to make money' (bearing in mind not all private operations are the same, we certainly put the children first, and not our pockets). We have absorbed many increases in costs in the past 18 months without passing them on to our families with fee increases.

This fee amount for licensing is overt, for any childcare provider! I don't think it's fair at all to be charged such a large amount for the provision of a license, particularly when there is no indication as what the funds will be used for or what services are provided. If anything, the collapse of ABC only proves that childcare is a tough game with ever increasing costs. Above all, it's not fair for families to continually be forking out more and more for childcare, which will surely occur with a 1:4 ratio (which, mind you, we think is positive step for the wellbeing of infants) and changes to the number of staff holding qualification requisites.

Given all the other requirements that are being looked at, such as 1 – 4 ratio's, 4 year Degree trained Teachers, together with wages increases, expenses related to agency staff when full time staff are on leave, RDO's or ill, increase in all other costs, the only choice we have is to increase the fees.

Who is going to pay for the interest on our loan if all the above costs keep going up, is the Government going to help us, I don't believe they will.

I am the Director of a Community based pre-school. As our budget is based on 'not for profit' and we haven't budgeted for this license fee, it will mean we will have to go without something - for instance one of our shade covers needs replacing, our carpet is worn, we would not be able to repaint; or we would have to cut back on equipment or staff hours. Something will have to go!

We are going to try and keep our fees in 2009 at 2008 level to help our families - but if we keep getting slugged like this without warning we will have to increase our fees - some of our families are already struggling.

We have had more cancellations for positions for next year than ever before. What happened to making pre-school more accessible to 4 year olds - doesn't the State Govt realise that the only way this will happen is if we can reduce fees?? They are finding ways to increase fees!!!

The introduction of this type of fee for licencing would be a huge strain on our centres already very tight budget. With the cost of living, staff wages etc all increasing unfortunately this has increased our fees already. With another high fee to pay to licence our centre, of course this will have to then be included when considering our centres fees. This will be another increase we have been unfortunately forced to make.....

With 45 children each day, over the year a \$1,100 licence fee would require 10 cents per child per day increase in fees to cover the cost to our break even fees.

I would suggest that DOCS could increase their funding to community based centres by the same amount, thereby having a neutral effect on not for profit centres, but effectively raising the money from the 'for profit' sector.

The cost will be passed on to parents.

I am concerned that when OSHC licencing comes in, our organisation would have to pass the costs on to the parents in our preschool and in our OSHC.

The impact would be to increase our fees.

I am writing to let you know of the impact a \$700 service fee would have on my centre. I run a small 28 place long day care centre. I am bewildered and shocked at the decision to impose a licence fee. I am an early childhood teacher with an interest in running my centre to an excellent standard. My centre makes me the equivalent of what I would earn teaching full time. This is not a huge amount of money.

My centre is running at 100% capacity but the reason for my earnings is I pay to have an extra staff member with the children and provide quality care. It blows my mind that you would take another \$700 per year from us and not put it back somehow into the child care industry. The government needs to make incentives for people to take on childcare centres – particularly people educated in Early Childhood. This fee will inevitably be passed on to the parents

through fees. Along with the 1 to 4 under two's new staff ratios, parents will be struggling as it is to pay the new fees. I thought it was the government's intention to try and encourage women and families back into the workforce? It just won't be worthwhile with the new fee structures that will need to be in place.

We are a 40 place community based Pre-school fighting to maintain our high standard while keeping fees affordable for our families. This is one more slug and like many others centres we cannot absorb another cost. We will have to pass this on directly as increased fees.

We are a community-based non-profit with

- 39 place state funded pre-school
- 12 place CCB LDC unit solely for chn under 3 (to meet local demand)

The different services are independently licenced...and so I imagine we will likely be hit with a fee of \$1,800 per annum. Although the services operate from the same address they are in different buildings but cannot be licenced as one entity because of some DoCs /funding small print.

What it means for us is another legislated non-child related expense that we cannot afford or do anything about.....that will need to be met by increased fees for families. And this when the mantra dictates that services need to be more affordable to families, yet provide a high quality service with quality staff who get paid a pittance for their efforts!!!!!!!!!!

And THEY wonder why we can't get more trained staff to stay in centres?????

We are a small regional Community Based centre located in X. We are licenced for 29 places a day but only have approx 10 enrolments per day (four days a week). We struggle financially every year. To meet regulations and QIAS standards is already a huge strain on our budget. Another \$1000 operating cost would either mean passing it on to parents (we only have 18 families in our centre), using our budget for toys/supplies for the children's program or cutting down on trained staff hours at the centre to pay this. I am sure that this scenario may be different for larger centres but for small regional centres it is a huge expense.

Let's hope that the Government looks into this a bit further so that it is fair and equitable for all. Just thought I would add to the comments to support your fight against the proposed licensing fee. I believe that whether you are a private for profit or not for profit centre there is only one way the additional fee is going to be paid and that is to pass the cost onto the parents.

Our parents are already suffering enough paying the highest fees for childcare/preschool education in the country. I believe we need to start educating the parents to understand the ongoing and increasing costs associated with running a high quality centre so they gain understanding of where their money is being spent.

When is the government going to put the children first?

With the introduction of the new CCMS, our not for profit centre struggles week to week just to pay wages, let alone overheads. We certainly do not need the added burden of finding more money to pay for a licence. The time and effort that goes into ensuring the centre is running according to licencing regulations and NCAC requirements as well as giving the children quality care is stressful enough without adding the pressure of fundraising or changing fee structures to accommodate a fee for a licence.

This new license fee that is proposed would have a huge impact on our small community based service, We cater for 23 children a day ages 0-5 yrs and already run at a loss. We are still trying to recover financially from all the staff wage rises and have had to significantly increase our fees already to cover this. We are situated in a low socio economic region and our families already struggle financially without having to deal with yet another fee rise, maybe the government should consider small services such as ours before they place yet another strain upon us.

This fee would impact on X Community Kindergarten. This amount represents one child's whole term fees that we would miss out on and would have to pass on to parents.

In the tough economic climate that we are all currently in, an added fee will impact on us by reducing our toy/craft budget by that amount, as increased costs with everything is already have an effect on us.

This kind of fee would be passed onto our parents through the budget, as are all expenses. This will be just another cost that we could well do without. As a community- based non-profit service the struggle just becomes all the more difficult.

On a similar monetary topic, as for the new funding model, based on the information gathered from our families (ASPARD) about **45%** of our families utilising our service live **outside** of the local government area this preschool is based. Why does the government/model not recognise that just because a family utilises a service in a local government area **does not** mean that they live in that local government area. ALL of these families live in LGA's that are funded at a higher level than the Preschool's LGA. This seems quite discriminatory.

To pay a licence fee would mean that fees would have to rise to cover the cost. Add this increase to inflation and other CPI increases plus the current economic conditions (that are resulting in decreased enrolments) our centre's financial viability is under extreme pressure.

We are a one-unit preschool and surmise that the \$700 fee would apply to us. This is equivalent to paying a child care worker 1 hour per week for 41 weeks (including superannuation): we know which provides the greater good!

Solution: waive the fee for all not-for-profit DOCS-funded organisations.

That sort of charge would have a huge impacted on our community based service. We are struggling to cover operational costs now. We lost funding with the new preschool roll out and this fee would create more pressure and uncertainty.

The impact on our service, who received no additional funding, would mean we would have to once again do budget cuts on equipment or staff hours.....there is no additional funds, no spare funds, at present our service may go to 2 days from 3 as there is a short fall of 6000.00 for Term 1 2009.....what this means is....

- Our staff loses work-and yes will need to find other work
- Our families only receive a 2 day service
- We will not be able to service all our families in our rural setting
- Playgroup will stop