

Community Child Care Fund Team
Department of Education
Email: CCCFProgramGuidelines@education.gov.au

16 June 2017

To Whom It May Concern

Australian Community Children's Services (ACCS) is grateful for the opportunity to respond to the draft Guidelines for the Community Child Care Fund outside the standard consultation via the department's website. We have made good use of the additional time to engage members nationwide in a discussion of the draft and in identifying the strengths and opportunities for improvement in the draft.

ACCS is the peak body representing Australia's not-for-profit community children's services and those who support the right of children to access these services. ACCS has branches in each state and territory throughout Australia.

ACCS is committed to:

- children, families and communities;
- children's entitlements for the best care, education and health services;
- community ownership;
- connected services for children, families and local communities;
- cost effective services - not for profit; and
- cultural diversity and respect for Aboriginal and Torres Strait Islander people as custodians of the land.

Strengths of the Draft CCC Fund Guidelines

ACCS is particularly pleased with the eligibility criteria requiring not-for-profit status for the recipient agencies. We see this as entirely appropriate, given that commercial child care providers can claim a tax deduction for the kind of expenditure intended for the Fund.

ACCS welcomes the Government's investment in the Community Child Care Fund to support disadvantaged areas, sustainability, capital costs, integration of child care and Maternal and Child Health and family support in disadvantaged areas. We know that staff outreach, building relations with complementary services and transport assistance can make an appreciable difference for families in disadvantaged areas.

We welcome the specification of funding categories – sustainability support, community support and capital support.

ACCS welcomes the quarantining of funds into restricted non-competitive grants for Budget Based Funded services. Aboriginal and Torres Strait Islander community services in

particular may struggle to compete with strongly resourced mainstream providers in the competitive grants process for the Community Child Care Fund.

We strongly support the focus on priority areas to ensure funds are allocated to areas of highest need.

We support eligibility for current recipients of funding under the Community Support Program.

Opportunities for Improvement in the Draft CCC Fund Guidelines

ACCS believes that the goals of the Community Child Care Fund would be better served if the Guidelines recognised that some services will not be able to transition to a model of operation that is self-sustaining. Entrenched poverty, long-term unemployment and disadvantage make sustainability without additional government funding impossible in many communities.

Recommendation: That the Guidelines be revised to make provision for ongoing funding for these communities, with specific focus on sustainability funding for Aboriginal and Torres Strait Islander community services.

Further, requiring services that are currently funded under the Community Support Program to apply for grants under the Community Child Care Fund will create uncertainty and potentially instability for families and children.

Recommendation: That the Guidelines be revised to allow services that are currently functioning well under the Community Support Program to transition to the new Community Child Care Fund without the need for competitive tendering, with an option for these services to apply for additional funding under the new programs.

Recommendation: That notice of the outcome of applications to the Community Child Care Fund allow sufficient time for unsuccessful applicants which are currently supported under the Community Support Program to adjust their operations and meet their commitments to children, families, staff and the local community.

Restricting eligibility to Approved Providers will exclude some agencies that are well placed to deliver, with strong community connections and community control.

Recommendation: That the Guidelines be revised to allow not-for-profit entities that are not yet Approved Providers to apply for funding, conditional on them becoming an approved provider if successful.

Increasing the \$150,000 upper limit on capital support will expand the opportunity for the Community Child Care Fund to expand the provision of child care places in areas of unmet demand

Recommendation: That the Guidelines be revised to increase the upper limit on capital support.

Small organisations may face particular challenges in completing an application to the Community Child Care Fund.

Recommendation: That support be provided the smaller organisations in completing an application.

For further information on this response, please contact me on mob: 0408 020 904.

Yours faithfully



Prue Warrilow
National Convenor