

Safe Transportation of Children to and from Early Learning (childcare) Facilities

# ACA Qld Submission



Australian Childcare Alliance  
Queensland



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## Contents

- 03 Introduction
- 04 What Regulatory, Contractual, and other requirements need to be considered?
- 06 Recommendations
- 07 What does our communications campaign need to include? How do we communicate?
- 07 IT solutions proposals
- 07 Developing workforce capabilities



## Introduction

As Queensland's peak body in the Early Childhood Education and Care (ECEC) sector, Australian Childcare Alliance Queensland (ACA Qld) represents more than 850 early learning (centre based, long day care) services employing approximately 13,500 educators, who educate and care for around 180,000 children in Queensland. We advocate on behalf of our 245,000 families and early learning (centre based, long day care) service providers, and pride ourselves on being a reputable source of evidence-based advice to policy makers and a trusted source of practical guidance to parents and service providers.

Our vision is a future where **every child in Australia, and Queensland** in particular, has access to safe, high quality, affordable and sustainable early learning (childcare) services, regardless of where they live or their socioeconomic background.

With the COVID-19 crisis smashing the global, national, and state economies and threatening the livelihoods and incomes of many Queensland families, never before has this vision been so important. ACA Queensland campaigned hard and fast, on behalf of our families, to ensure our services could stay open, especially for those parents who work on the health and emergency frontline.

The benefits of high-quality Early Childhood Education and Care (ECEC) are now well recognised as the bedrock of our economy and a safe haven for all children, especially those most vulnerable.

Throughout this health crisis, it was very clear that too many Queensland children were, sadly, safer with our educators than in their own homes.

There is an abundance of evidence from studies in Australia and internationally, demonstrating the significant advantages children gain from attending quality ECEC services, which in turn, flow on to their family and the wider community. Our economy depends on these services remaining viable.

With deep mutual respect and trust, ACA has always worked closely with Department of Education, Queensland Regulatory Authority and Minister for Education, the Hon Grace Grace MP. ACA is extremely supportive and appreciative of the review into the safe transportation of children to and from early learning (childcare) services and we stand should-to-shoulder with the Government on ensuring the safety of our children remains the absolute priority of this sector.

**Majella Fitzsimmons**  
President ACA Qld

**Brent Stokes**  
General Manager ACA Qld



## What regulatory, contractual, and other requirements need to be considered?

The health, safety, and wellbeing of the children (Quality area 2) in our care is paramount and absolutely, the number one priority for all our approved providers, educators, and families. There is no issue more important to us.

In many cases, vulnerable children must be escorted (via a private bus and driver) to our centres in order to help their families continue with their care and early education. If it weren't for these services, some of the most disadvantaged families would literally not be able to attend our services. This potentially places these children at greater risk of harm in their home, and they would fall further behind in their early education; early intervention generally results in referrals to pediatricians and allied health services to ensure the child is meeting developmental milestones.

Approved ECEC Providers must abide by all legislative provisions of either the Education or Care Services National Law (National Law) and the Education and Care Services Act 2013 (Qld) (ECS Act) when conducting transportation of children in all circumstances.

The principal objective of the National Quality Framework as set out in section 3 of the National Law is to ensure the health, safety and wellbeing of children attending education and care services. Section 4 of the ECS Act is to ensure the safety, health, and wellbeing of children.

Pursuant to section 167 of the National Law, and section 122 of the ECS Act the Approved Provider of a service must ensure that every reasonable precaution is taken to protect children being educated and cared for from harm and hazard likely to cause injury; and

Pursuant to section 165 of the National Law, and section 121 of the ECS Act the Approved Provider of a service must ensure that all children being educated and cared for are adequately supervised at all times that children are in the care of that service.

Pursuant to regulations 158 to 161 Education and Care Services National Regulations (National Regulations), and regulations 61 and 62 of the Education and Care services Regulation 2013 (ECS Regulation) Approved Providers should also have regard to the requirements to keep accurate attendance and enrolment records.

Pursuant to regulations 99 to 102 of the National Regulations, and regulations 55 and 56 of the ECS Regulation where children leave the premises in order for transportation, this forms an excursion or regular outing and therefore Approved Providers must ensure that a risk assessment is developed and authorisation is provided for children to attend.

Approved providers and educators have an important role in transporting children safely across the state each day to ensure children are protected from harm and hazard. Without transportation, some children would not benefit from a quality early childhood education.

Unfortunately, in the past, young children have been left unsupervised in vehicles for extended periods. Tragically, this has resulted in the shocking death of a three-year-old child in early 2020. It is worth noting that two people were in attendance on the vehicle in this instance. To the best of our knowledge, we do not have any evidence of injury to children during transportation.

Australian Childcare Alliance Queensland (ACA Qld) is completely committed to ensuring the following steps are adopted to help protect all children who are accessing transport provided by ECEC providers.

1. A detailed transportation policy that includes procedures and forms, contextualised to each specific service
2. Training of the above policy including procedures
3. Risk assessment be conducted by each service identifying risk areas and how these will be mitigated
4. Accurate roll records maintained and up to date
5. Roll check and a head counts conducted before children enter and exit the bus service
6. A thorough check of the vehicle to be conducted by the bus driver and recorded at the end of each trip – bus door to be left open as a visual reminder until the second check is complete
7. An additional check of the vehicle at the end of the journey by an independent person not associated with the travel of the vehicle, e.g. Nominated Supervisor/Responsible person. The bus is then locked by an independent person e.g. Nominated Supervisor/Responsible person
8. If there is ever a situation where a child is unaccounted for, immediate necessary steps taken to establish the child's whereabouts

In our considered and collective experience, the greatest risk to children's safety during their transport to and from an early learning (childcare) facility is at the end of the journey. For example, in the past; the greatest danger, even tragic death, has come when a child has been left, tragically and incomprehensibly, unattended, in a vehicle after it was parked.

We believe all aspects of the risks involved in transporting young children to and from services, should be reviewed by an independent medical research investigator before any black letter law decision are made. We need an evidence-based approach to know what the most effective levers are to ensure the safety of our youngest charges. There may be other changes not yet considered that independent researchers could review and recommend.

The cost of accommodating a second person to travel on the bus at all times may give parents and providers some comfort, right now, however, we need to know such a change is evidence-based. We need to only put in place policy changes that will achieve what we all want – for our children to be delivered safe and sound to our services or to their homes while avoiding unintended consequences, such as reduced attendance of vulnerable and disadvantage children.

We do know that if each of our already overstretched and struggling services are forced to redirect precious resources to ensure an additional adult joins every bus journey; there will be an adverse financial impact on all of the families of that service at a time when any further avoidable economic stress simply can't be tolerated.

We will fight for the safety of our children, and that is our only priority, but we need to be sure that any change that incurs a cost impact for our families does indeed achieve that safety aim.

## Safe Transportation of Children to and from Early Learning (childcare) Facilities

If it doesn't, not only will such a change provide false hope of safety for families; we are concerned that the cost impact of such a change will cause more harm than good.

The sector would need to understand the impact a second person required on transportation would have on Family Day Care when there is often only one person present.

We need to ensure that such an additional cost is both justified and based on evidence so we can be sure such a policy change absolutely achieves our shared objective in improving safety for the youngest of Australians.

The community deserves verification of the true risks and using evidence-based strategies on how to best mitigate those risks - without imposing greater costs on parents at a time when many families are doing it tough is very important.

The Government could resolve these tensions by absorbing the costs of the additional person on the bus.

The additional cost of a second approved adult being on the bus (morning and afternoon) is anticipated to be approximately \$150 per day. This is without considering the reduced capacity of one child per service. This cost cannot reasonably be passed onto parents or absorbed by services, not at a time when both families and services are already under immense financial strain.

### Recommendations

- An independent medical research study should be commissioned to assess the true risk/benefit analysis of a second person (supervisor) "should" be in attendance on the vehicle during transportation in order to maintain adequate supervision and ensure children are protected from harm and hazard OR provide alternative measures/recommendations that will ensure the safety and wellbeing of all children being transported by an ECEC service
- If the second person (supervisor) is required on the bus during the entire journey, the State Government – not parents or services - should cover the anticipated increase in cost.

	Am bus Run		PM Bus Run
<b>hours x Average cost of staff member plus 25% employee on costs</b>	3 hours x \$23.00		3 hours x \$23.00
	\$ 5.75		\$ 5.75
	\$ 74.75		\$ 74.75
<b>COSTINGS for average 75 place centre</b>			
<b>Daily cost per service</b>	\$ 149.50	<b>Daily cost per child</b>	\$ 0.40
<b>Weekly Cost per service</b>	\$ 747.50	<b>Weekly Cost per child</b>	\$ 1.99
<b>Annual Cost per service</b>	\$ 38,870.00	<b>Annual Cost per child</b>	\$ 103.65

## What does our communications campaign need to include? How do we communicate?

Australian Childcare Alliance Queensland (ACA Qld) believe it is important that the sector in Queensland has a clear understanding of what is required. We believe we can support this through the numerous communication channels we use to engage with our members.

Consultation needs to be conducted with the sector to understand the unintended consequences if our recommendations are not implemented. Efforts need to be made to avoid this complementary inclusive service from becoming unviable and therefore being removed from services.

We stand ready to support the Government in rolling out an evidence-based campaign to give comfort and assurance to families their children will always be safe in our care and that all measures have been taken to protect them as they are transported to and from our services.

## IT solutions proposals

Australian Childcare Alliance Queensland (ACA Qld) believe IT solutions may be achieved in a cost-effective manner through an existing relationship with third party software providers, e.g. Kidsoft, QikKids.

## Developing workforce capabilities

Australian Childcare Alliance Queensland (ACA Qld) believes there are shortages of quality early childhood educators and teachers; therefore, we would like to achieve the desired outcomes within our existing workforce capabilities. Support could be provided with training and professional development.



# Australian Childcare Alliance Queensland

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