



**THE POLICE
ASSOCIATION
VICTORIA**

Australian Competition and Consumer Commission, Price Inquiry— Childcare

SUBMISSION – October, 2023



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27 October 2023

Price Inquiry – Childcare

Australian Competition and Consumer Commission
Land of the Ngunnawal People
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Canberra ACT 2601

By email: childcareinquirytaskforce@acc.gov.au

The Police Association of Victoria Submission to the Childcare Inquiry

The Police Association of Victoria (**the Association**) thanks the Australian Competition and Consumer Commission (**the Commission**) for the opportunity to provide input into the Price Inquiry— Childcare (**Childcare Inquiry**)

The Police Association of Victoria

The Association is an organisation that exists to advance and represent the industrial, legal, professional and welfare interests of its members. The Association's membership of over 18,000 is drawn exclusively from sworn Police Officers at any rank, Protective Services Officers, Police Reservists and Police Recruits who serve in Victoria Police. Membership of the Association is voluntary. By virtue of its constitution, the Association is not affiliated with any political party.

Background

The Association has long advocated for better childcare options for our members. In 2013, the Association successfully lobbied the Government to implement a trial for emergency services workers (ESWs) involving Family Day Care Australia carers. In 2015/16, a different trial was undertaken using nannies. Due to a lack of uptake however, both trials were discontinued. Since then, the Association has seen a renewed appetite for change amongst the membership with respect to improving childcare options and addressing the impacts limited childcare options has on members' working lives and their wellbeing.

Contemporary landscape

Given the shift work nature of policing, our members typically utilise a variety of childcare sources to cover their spread of hours. Data from the Association's Access to Childcare Survey (2021) revealed that:

- Private childcare was the primary form of childcare used by members (44%).
- If rostered on a public holiday, 45% of all survey respondents use the other parent for childcare while 35% of survey respondents' relatives provide childcare.
- If rostered to work night shift, 53% of members use the other parent for childcare and 27% of survey respondents use a relative.¹

Unsurprisingly, 68% of survey respondents concluding that current childcare options are insufficient.²

¹ The Police Association of Victoria (2021) Access to Childcare Research Report, East Melbourne: The Police Association of Victoria, p.5-6.

² Ibid, p.7.

The inadequate provision of childcare has a range of impacts on the working lives and wellbeing of our membership. Indeed, 87% of respondents to the Access to Childcare Survey feel that the childcare options currently available to them impacts their working life. In addition, nearly 90% of members surveyed have been required to take carers leave as a direct result of being unable to find appropriate childcare. Of the proportion of respondents who have been required to take carers leave, 58% indicated that they were unable to find appropriate childcare due to it being unavailable for their rostered shift. Qualitative data revealed that many members are restricted with respect to the roles they can perform within their workplace, and that current childcare options limit their ability to apply for transfer or promotion. 77% of all respondents indicate that the hours of work they can perform are impacted by limited childcare options, while over 70% are impacted with respect to secondments and higher duties.³ Our members consistently explain that the sacrifices and arrangements they have had to make to facilitate childcare has hindered their career progression.

In addition, 60% of all survey respondents report that limited childcare options have affected their wellbeing. A significant number of survey respondents and focus group participants stated that limited childcare options have caused a huge amount of stress, due in large part to the high expense of childcare. Members also explained that the pressure and strain limited childcare options has had on their relationship has been immense. Respondents described feelings of being marginalised and disconnected at work, as well as being treated differently to members without childcare responsibilities.⁴

Addressing the needs of shift workers into the future

We contend that shift workers, including our members and all ESW's, represent a clear example of both a geographical and a temporal market failure of the childcare sector. Our members provide an essential statewide service, and as such, suffer from the same childcare supply and access issues as all other workers in regional areas.⁵ The temporal market failure is created by the nature of shiftwork within a 24-hour policing service in the context of childcare operating across an ever-shrinking definition of 'ordinary hours'. As identified in the Commission's Childcare Inquiry Interim Report (the Interim Report), the majority of service providers are responding to changes in the Childcare Subsidy by reducing daily session lengths to 10 hours and increasing fees.⁶ This presents a clear issue to those workers who do not perform typical working hours. Specifically:

An unintended consequence is that there may be less favourable options available for households in an area with different needs to the norm, including those entitled to fewer subsidised hours of care and/or those who need greater flexibility, such as households with shift workers.⁷

³ Ibid, p.9.

⁴ Ibid, p.10.

⁵ Australian Competition and Consumer Commission, Childcare Inquiry – September interim report, Canberra: Commonwealth of Australia, p.73-74

⁶ Ibid, p.23

⁷ Ibid, p.24

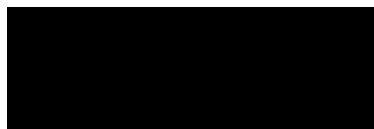


Indeed, this trend further disadvantages Victoria Police members specifically. An increasing proportion of our membership are operating on Flexible Working Agreements that include performing 10-hour shifts. Data from a recent survey of members titled Improving Workplace Flexibility (2023) revealed 32% of respondents with carer status are on a FWA, compared to 12% of respondents with non-carer status.⁸ The predominant reason why members applied for their FWA was due to their parenting of children school-aged or younger (54%).⁹ These steps demonstrate that our members are doing all that they can to maintain employment with Victoria Police while taking care of their children. Many members emphasised that more flexibility by both Victoria Police and childcare providers, as well as more extensive financial assistance in order to reduce the cost of private childcare would hugely benefit members.¹⁰ It is time that the state takes steps to facilitate this balancing act.

The first step is to fund childcare providers to provide an expansion of ordinary hours. In the Access to Childcare Survey (2020), when considering whether childcare opening earlier and later on weekdays, or childcare opening on public holidays is most important, the majority of all survey respondents (60%) are of the opinion that childcare opening earlier and later on weekdays is most important. The majority of members who indicated a preference for this solution would need childcare to open at 6am and close no earlier than 7pm.¹¹

In addition, we submit that childcare providers should be directly subsidised for providing a span of hours that cover shiftwork. The state must step in to create places that accommodate shiftwork without financially penalising essential workers. Finally, we appreciate that staffing constraints represent an ongoing barrier to more suppliers entering or expanding their operations in childcare markets.¹² Addressing the current deficit necessarily involves directly subsidising higher wages for out of hours span of ordinary hours in the Children's Services Award. These are simple and clear solutions that offer an obvious return on investment by supporting essential workers and ensuring that expertise is retained in the workforce.

For consideration,



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⁸ The Police Association of Victoria (2023) Improving Workplace Flexibility Research Report, East Melbourne: The Police Association of Victoria, p. 7

⁹ Ibid, p. 8

¹⁰ The Police Association of Victoria (2021) Access to Childcare Research Report, East Melbourne: The Police Association of Victoria, p.16.

¹¹ Ibid, p.13.

¹² Australian Competition and Consumer Commission, Childcare Inquiry – September interim report, Canberra: Commonwealth of Australia, p.28