

**Isolated Children's Parents' Association of Australia (Inc)**

**“Access to Education”**



**Submission**

**to the**

**Senate Education and Employment Legislation Committee**

**on the**

**Family Assistance Legislation Amendment  
(Building on the Child Care Package) Bill 2019 (provisions)**

**from the**

**Federal Council**

**of the**

**Isolated Children's Parents' Association of Australia Inc.  
ICPA (Aust)**

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), is grateful for the opportunity to lodge a submission to the Senate Education and Employment Legislation Committee on the Family Assistance Legislation Amendment (Building on the Child Care Package) Bill 2019 (provisions), in relation to the addition of In Home Care to this legislation.

### **Transitional Provisions for Remote and Very Remote Families requiring Child Care**

ICPA (Aust) understands that the new In Home Care (IHC) program was not added to the Family Assistance Legislation when the new Child Care Package was included as the In Home Care Review and the evaluation of the Nanny Pilot Program were not finalised at that time. Members at our recent Federal Conference were concerned that the transitional provisions made for In Home Care remote and very remote families which addressed challenges associated with attracting and retaining educators in these areas, will conclude in January 2020 despite continuing difficulties, and there is no grace period for new IHC educators to settle into such isolated areas. Please find the following segment from the In Home Care National Guidelines<sup>1</sup> below:

*"Transitional provisions for IHC educators working in remote and very remote areas (until 1 January 2020)*

*In recognition that IHC educators working in remote and very remote areas may experience difficulties in meeting the qualification requirements for IHC (a Certificate III or evidence of actively working towards this qualification), the following transitional provisions will apply until 1 January 2020.*

- (1) An IHC Educator providing services in a remote or a very remote area will meet the qualification requirements for the IHC Educators if the IHC Educator has access to and utilises the expertise of an educator with at least a Certificate III in early childhood education and care for at least 20 per cent of the time care is provided to a family. This may be by means of information and communication technology*
- (2) If the educator has been continuously employed at an early childhood education and care service located in a remote or a very remote area for a period of at least 15 years, then the educator does not need to hold or be actively working towards a Certificate III level education and care qualification.*

*These transitional provisions mirror the transitional regulations under the Education and Care Services National Law Act 2010 that seek to address the difficulties in attracting and retaining Early Childhood Teachers in remote and very remote areas.*

*The IHC Educator must not be a family member, as detailed in the Minister's Child Care Subsidy Rules 2017. However, there is a limited exemption for IHC Educators in very remote areas."*

Despite requesting an extension of the Transitional Provisions for IHC with the Minister and Department of Education in line with the recent extension given to Early Childhood Teachers, ICPA (Aust) has not received any further information in regard to this and is anxious to see those IHC transitional provisions also extended for another two years. This is due to the increasing difficulty of securing qualified In Home Care educators in remote locations as indicated above. At this time there has been no consideration for disadvantaged remote families' child care needs after January 2020.

All geographically isolated families need to be able to qualify for the Transitional Provisions or any subsequent considerations within In Home Care, not just those in remote and very remote areas, as many geographically isolated families cannot access any other form of child care.

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<sup>1</sup> [https://docs.education.gov.au/system/files/doc/other/ihc\\_national\\_guidelines\\_-december\\_2018.pdf](https://docs.education.gov.au/system/files/doc/other/ihc_national_guidelines_-december_2018.pdf)

The following extract from the Amendment Bill reads:

*“85ECA No eligibility for in home care unless certain requirements met*

*An individual is not eligible for CCS or ACCS, and an approved provider is not eligible for ACCS (child wellbeing), for a session of care provided by an in home care service to a child unless any requirements prescribed by the Minister’s rules are met.”*

### **Supervision of Distance Education within In Home Care**

In Home Care is targeted at 0-5 year olds, however, many geographically isolated families require child care for their school-aged children as well, sometimes up to the age of 15 years, particularly where families cannot afford to send their children to boarding school and are working hard trying to make a living. As the required qualification of Cert III ECEC is mostly aimed at educators caring for under school-aged children, our members would appreciate the acceptance of educators holding a Cert III in Educational Support or equivalent when caring for school-aged children.

ICPA (Aust) understands that the In Home Care Service Providers and Educators must adhere to the Minister’s Rules and asks for an exemption for rural and remote families so that In Home Care educators be allowed to supervise distance education students where no face-to-face schooling is available, as there is no teacher physically present to care for the children during the formal school hours and for families to receive the Child Care Subsidy in this instance. This would then allow both parents to work, which the Child Care Package was meant to encourage, leaving the In Home Care educator to care for the students as necessary.

### **Extension of Child Care Enrolments from 8 to 14 weeks**

ICPA (Aust) welcomes this amendment as some In Home Care educators do not settle well in isolated areas and may not stay with a geographically isolated family for very long. It can be several weeks before a replacement educator is found, and this amendment should help prevent a rural and remote family losing their designated place within In Home Care.

*“Amendments to A New Tax System (Family Assistance) (Administration) Act 1999 include increasing the number of weeks at which enrolments automatically cease due to non-attendance from 8 to 14 weeks. This will reduce regulatory burden on both families and child care providers by eliminating the need for children to be re-enrolled following most regular breaks in attendance, such as where a child does not attend care during the school term. This is the only amendment to commence on 13 January 2020, to enable the change to be implemented for the December– January (2019–20) school holiday period.”*

### **Conclusion**

Accessing child care in geographically isolated areas is fraught with difficulties due to the distance away from regulated child care services. In Home Care is the only viable alternative for rural and remote families. Some states, in particular South Australia, still do not provide In Home Care to remote families which effectively prevents both parents earning an income on the property or accessing off-farm income, necessary in this extended drought.

In Home Care, though shortly to be legislated within Family Assistance Legislation, does not meet the specific needs of rural and remote families. ICPA (Aust) recommends that a separate Early Childhood Branch within the Department of Education be dedicated to geographically isolated families, encompassing all rural and remote Early Childhood Education and Care (including In Home Care, Preschool/Kindergarten, Long Day Care, Playgroups and ex-BBF Mobile Early Childhood Services) and that more consideration be given to geographically isolated families in this vulnerable and disadvantaged sector.