

**Isolated Children's Parents' Association of Australia Inc.**

**"Access to Education"**



**Feedback**

to the

**Department of Education and Training**

on the

**National In Home Care Draft Guidelines**

from the

**Federal Council**

of the

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

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## Feedback on the National In Home Care Draft Guidelines

### *1. Introduction*

#### *1.3.1. CCS for In Home Care*

To access IHC, families must be eligible for the CCS. Unlike the CCS rates for other approved types of child care, a family's CCS entitlement for IHC will be based on a **family hourly rate cap** and not an hourly rate cap per child.

Families using IHC will be entitled to a CCS rate of zero to 85 per cent of the actual fee charged, or 85 per cent of the family hourly rate cap of \$25, whichever is lower depending on their combined annual family income. Further information about the CCS can be found at [Child Care Subsidy](#).

Example:

A family with an annual income of less than \$65,000 will be eligible for the maximum rate of 85 per cent of the family hourly rate of \$25, which is equal to \$21.25. If the IHC fee is \$30 per hour, the family will pay the difference between the fee charged and the subsidy amount (\$30-\$25=\$5), and make a co-contribution of 15 per cent of the family hourly rate (\$3.75). In this example, the family will be \$8.75 out-of-pocket per hour, in total.

#### *1.3.2. Additional Child Care Subsidy (ACCS)*

Families receiving In Home care may also be eligible for ACCS, which is a key component of the Child Care Safety Net.

Note:

Eligibility for the ACCS does not automatically mean eligibility for IHC and vice versa, as the eligibility criteria are different.

The ACCS provides assistance in the following circumstances:

- families who require practical help to support their child's safety and wellbeing
- grandparent primary carers on income support
- families experiencing temporary financial hardship.

Eligible families will receive a subsidy equal to the actual fee charged, up to 120 per cent of the In Home Care family hourly rate cap of \$25 per hour. Families eligible for ACCS (Child Wellbeing), ACCS (Grandparent) or ACCS (Temporary Financial Hardship) will not be subject to the activity test, and will be entitled to up to 100 hours of care per child, per fortnight.

ACCS is also available for:

- parents transitioning to work from income support.

Eligible families for ACCS (Transition to Work) will receive a subsidy of 95 per cent of the actual fee charged or up to 95 percent of the family hourly rate cap of \$25, whichever is lower. Hours of subsidised care will be determined by the Child Care Subsidy Activity Test.

Further information on the ACCS is available at [Additional Child Care Subsidy](#).

Families experiencing exceptional circumstances, if eligible, may be able to access additional support to meet their child care costs.

### *1.5. Principles for the In Home Care service type*

IHC aims to address issues identified in the reviews, and refocus service delivery on supporting

families to access early childhood education and care where other approved child care options are not available or appropriate. The key principles for IHC are to:

- focus care primarily on early childhood education and care
- ensure consistency in the assessment of families’ suitability for IHC
- support families to transition to other approved child care services where appropriate
- improve consistency in service delivery at a national level
- refer families to the most appropriate family support services.

<p><b>1.</b></p> <p>1.3.1</p> <p>1.3.2</p> <p>1.5</p>	<ul style="list-style-type: none"> <li>• No recognition of additional costs of board and lodging with the geographically-isolated family where IHC educator is required to live on a property due to distance from nearest town.</li> <li>• If fulltime meals and accommodation are required for the educator (as above), family should be eligible for ACCS or extra subsidy to be equitable to other families accessing IHC.</li> <li>• Principles should include supervision or provision of early childhood education of approved preschool/kindergarten mainstream child care program where no other preschool program can be accessed.</li> </ul>
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## **2. *In Home Care***

### **2.1. *Objective of the In Home Care type***

The objective of IHC is to provide a high quality, flexible early childhood education and care option to families for whom other approved child care options are not available or appropriate due to their unique circumstances.

It will be a condition of continued approval as an IHC Provider that the IHC Services operated by them provide care only to families who can demonstrate they are unable to access other approved child care options, and meet the eligibility criteria.

### **2.3. *About In Home Care***

IHC is an approved child care service type, delivered in the family home for children from the same family, whose access to early childhood development opportunities would otherwise be limited due to their families’ challenging circumstances.

IHC places will be allocated to IHC Services, with up to a maximum of 3,000 places allocated nationally. For administration purposes, an IHC place represents 35 hours of care per week per child, but this is not related to the number of hours of subsidised care to which a family is entitled. Places will be allocated using a nationally consistent approach, to enable an equitable allocation across states and territories.

New IHC Support Agencies will be contracted by the department to cover all states and territories to support families. IHC Support Agencies will assist the department in distributing places to families meeting the criteria for the IHC service type, with the focus being on an equitable distribution.

IHC Support Agencies will match families to educators/services able to meet their needs and refer families to other support services as required. The IHC Support Agencies will be the primary conduit

between families and services, and will advocate for families. They will monitor care delivery by IHC Services to ensure service offerings remain focussed primarily on education and care, and fee charging practices are appropriate.

IHC Services will be responsible for engaging, managing, and supporting suitably qualified educators, including ensuring workplace health and safety for educators.

#### **2.4. Key elements of IHC**

Key elements of IHC are:

- consistent service delivery and a focus on early childhood education and care
- program delivery through a networked brokerage model of state and territory based IHC Support Agencies
- consistent application of criteria for the IHC care type
- a more equitable distribution of 3000 places based on population
- Child Care Subsidy family hourly rate cap of \$25 per hour
- parental co-contribution towards child care fees
- regular review mechanisms to ascertain families continued need for IHC
- support for transitioning families to other approved child care service types, where appropriate
- help for families to access support services, such as disability support through the National Disability Insurance Scheme (NDIS), respite care and allied health services, where required
- minimum qualification requirements for educators and support for their professional development.

2.	
2.1	<ul style="list-style-type: none"> <li>• The geographically-isolated family certainly faces a unique set of circumstances for whom affordable and flexible child care and support is essential. Primary school supervision of distance education would fit within the definition of 'high quality, flexible early childhood education and care option'.</li> </ul>
2.3	<ul style="list-style-type: none"> <li>• Families need to be consulted whilst choosing an appropriate IHC educator, especially if the educator is required to live on the isolated property.</li> </ul>
2.4	<ul style="list-style-type: none"> <li>• "Distribution of 3000 places based on population" - need more places in rural and remote areas (population few) where no other child care is available.</li> <li>• Need for child care reviews - minimum 6-12 monthly term on property otherwise too disruptive for rural family.</li> <li>• PD for educators may be difficult due to distance unless conducted online-dependent on internet quality and data allowance.</li> </ul>

#### **2.5. Scope of IHC**

##### **2.5.1. Activities in and outside of scope of IHC**

IHC can be used for a maximum of four CCS eligible children preschool age or under, and a maximum of five CCS eligible children in one session of care. All children must be from the same family. If there are more than five children in the family requiring IHC, then an additional educator may be engaged for another session of care.

The following activities are outside the scope of IHC:

- home schooling
- supervision of distance education
- household chores such as cleaning, shopping and meal preparation, unless

- undertaken in relation to caring for the child/children in the session of care
- education and care provided by unqualified educators
- support services not related to early childhood education and care, including as parental support, disability support and respite care
- multi-care (i.e. where care is provided for children from more than one family)
- transport only
- any activities out of scope of CCS
- allied health services
- any other activities unrelated to child care.

IHC must not be used where other approved child care service types are an option for the family. In some circumstances, IHC may be provided in combination with other child care types (CBC, FDC or OSHC), where these services are not available during the times care is required by a family. The total number of hours of approved child care is dictated by the CCS activity test result.

### 2.5.2. *Change in family circumstances*

The IHC Support Agency will review a family’s circumstances at quarterly intervals. The family will also be asked to advise the IHC Support Agency of any change in their circumstances.

2.5.1	<p>The Australian Government Department of Education and Training website states, “The revised In Home Care (IHC) program will provide flexible care that supports families’ workforce participation and child care requirements where other options are not available or appropriate.” Surely where distance education is the only primary school education option due to geographical isolation, supervision of distance education (DE) work, outside of lesson time overseen by teachers, would be within the scope.</p> <ul style="list-style-type: none"> <li>• Supervision of distance education is excluded on list <b>but</b> the educator is often more qualified than the parent (home tutor) who is usually untrained with little experience. This would be excellent use of the educator’s qualifications in isolated situations.</li> <li>• Even though education should be provided through the states, it is not possible for each distance education student to be taught directly ‘on air’ for a full school day by his/her School of Distance Education teacher; in most circumstances, it is only an hour per day. The educator should be able to provide supervision for students at other times during the day when children are not ‘on air’ being taught directly by the School of Distance Education teacher.</li> <li>• If IHC educators are not able to supervise DE, a parent will need to supervise the children (usually the mother) thus the family will not qualify for the activity test to access the CCS unless the mother is also an unpaid worker in the family business (some families manage properties for a pastoral company, which would negate this) or work on or off the property, as supervising DE is a fulltime unpaid job. Therefore, the family would have to pay the full cost of IHC as well as sacrificing an income, as the mother would be required to supervise DE. Or, the family incurs the cost of a governess to be employed as well as the IHC educator where a parent is unable to be a home tutor, which is unaffordable for many rural and remote families, causing great financial and mental strains upon them. IHC educators that are not able to supervise DE would therefore decrease workforce activity in rural and remote families.</li> </ul>
2.5.2	<ul style="list-style-type: none"> <li>• Reviews at quarterly intervals could be very difficult, due to distance, unless by phone or internet. Six monthly or yearly reviews would be more appropriate.</li> </ul>

### ***3. IHC operating model***

#### ***3.1. Networked IHC Support Agencies***

IHC will be delivered through a small network of IHC Support Agencies. A key role of the IHC Support Agencies will be to ensure the integrity of the care type, and assist the department in monitoring compliance. The IHC Support Agencies will work closely with approved IHC Services and IHC Educators to deliver care in an equitable and structured manner. This networked broker model of service delivery, where IHC Support Agencies act as “brokers” and advocates for families, aims to increase assurance for families in the service offering they receive, as well as national consistency in service delivery.

An IHC Support Agency will be established to service each state and territory. Service delivery will be based on a Family Management Plan agreed between the IHC Support Agency and the family. Services will engage qualified educators to provide care in the family home, and will monitor the day-to-day provision of care.

The IHC Support Agencies will:

- assess families’ needs to determine child care requirements and possible support required by other family support services
- act as an advocate for families and as a conduit between families and services/educators
- develop a Family Management Plan
- match families to educators engaged by IHC Services that can meet their needs
- make recommendations to the department on the distribution of places to IHC Services
- review Family Management Plans on a quarterly basis and, where appropriate, transition families to other approved child care types and/or support services
- monitor IHC Service provision to ensure a focus on quality early childhood education and care
- provide professional development support for educators
- provide quarterly reports to the department on agreed indicators
- promote, including via their websites, IHC across their jurisdiction, to:
  - support market development by identifying potential new IHC Services
  - ensure families who cannot access other approved child care service types are aware IHC may be an option for them
  - establish networks with family support services including referral pathways.

IHC Support Agencies will be appointed through a competitive, open tender process and will enter into a legally binding contractual agreement with the department.

#### ***3.2.3 Support for educators***

The IHC Support Agency will support educators by:

- providing guidance material such as resources for providing education and care in the family home and tips for working with families that have complex needs
- establishing a community of practice amongst educators to promote good practices in delivering IHC
- being an independent party with whom the educator can discuss concerns relating to the safety of the physical environment in which they are working.

### ***3.6 IHC Educators***

#### ***3.6.1 Working with IHC Services***

All educators providing IHC must be engaged by an approved IHC Service, and may be engaged either as an employee or a contractor. Further information about the employment arrangements is available from the Australian Taxation Office and Fair Works Commission, including on the respective websites of these agencies at: [ATO](http://www.ato.gov.au) and [Fair Works Ombudsman](http://www.fairwork.gov.au).

To ensure consistency in the quality of care being provided, IHC educators will be required to have a minimum Certificate III level qualification in a relevant course, or be working towards a Certificate III qualification.

The Australian Children's Education and Care Quality Authority (ACECQA), established under the *Early Childhood Education and Care Act 2010* to guide the implementation of the National Quality Framework, sets out the criteria for an educator to be considered as actively working towards a Certificate III course. Whilst IHC Services do not come under the *Early Childhood Education and Care Act 2010*, the intention is for the requirement for working towards a qualification to be consistent.

This criterion requires the educator to provide documentary evidence from the course provider to the service indicating that educator is:

- enrolled in a course and has started study;
- making satisfactory progress towards completing the course; and
- meeting the requirements to maintain the enrolment.

IHC Educators must:

- be at least 18 years' old
- be engaged by an approved service to provide IHC
- have attained (or be working towards) a Certificate III qualification in Early Childhood Education and Care
- hold a current police and working with children check acceptable in the state or territory in which they intend to work
- hold a current first aid qualification
- hold a driving licence
- be an Australian citizen or a permanent resident or have a relevant visa to allow employment on a continuous basis for 12 months or more.

The Educator should not be a family member. If a relationship exists between the family and the educator, the educator must disclose it to the IHC Service for which they are working. The IHC Service will then make a determination as to whether the educator is able to provide In Home Care for the family.

Educators must be willing to have the information they provide to the selected service shared with the provider, department and families (where relevant). Educators must also agree to their information being shared with the third party engaged to conduct the evaluation of IHC and the broader child care package.

IHC Educators can apply to more than one IHC Service, and they can be employees of other types of approved child care services. Details of IHC Services will be published on the relevant IHC Support Agency website.

Educators must provide to the IHC service they are working for:

- evidence of relevant qualifications
- a police check issued no more than six months before submitting application to work with the service
- proof of identity
- evidence of a current Working with Children check
- evidence of current first aid qualifications.

### **3.6.2 Role of the educator**

The educator will provide education and care in accordance with the Family Management Plan, and

will be responsible for ensuring the quality of the early learning program. Educators cannot be engaged for the purpose of educating school aged children, however, child care may be provided for eligible school aged children before and after school hours, provided there is no FDC or OSHC available during these hours.

In exceptional circumstances, educators may be required to board with the family for example, if the family home is in a remote area. While being paid as an IHC educator, the educator will not be expected to undertake household chores such as cleaning, shopping, meal preparation or other household duties for the family unless they are undertaken as part of child care. Should there be any dispute about the nature of services requested by the family, the educator must consult with the service.

The role of the educator is to:

- maintain the necessary checks and insurances
- seek the necessary support from the IHC Service, particularly where working conditions are not satisfactory or there are concerns about child safety and personal safety
- utilise the professional development support offered by the service and the IHC Support Agency where possible.

<b>3.</b>	
3.1	<ul style="list-style-type: none"> <li>• IHC Support Agencies (city-based) need to be very knowledgeable of the needs of rural and remote families and incorporate this in their dealings with IHC Services and families.</li> </ul>
3.2.3	<ul style="list-style-type: none"> <li>• As extra resources for education and care in the family will be provided as necessary, so an approved preschool program especially where there is none other available, should also be delivered so early detection of learning problems can be assessed and intervention given as per 3.3.</li> </ul>
3.6.1	<ul style="list-style-type: none"> <li>• Consideration should be given to IHC educators reaching 18-years-old during their gap year, who are not working towards Cert III in ECEC where other educators cannot be accessed to work with families in very remote areas.</li> </ul>
3.6.2	<ul style="list-style-type: none"> <li>• Can be problems gaining 120 hours practical experience for Cert III if living far from the nearest child care centre.</li> <li>• Educators to provide an early learning program - preschoolers are those in the year before school-age, therefore educators should be able to deliver such a program.</li> </ul>

#### ***4. Transition Arrangements***

##### ***4.1. Transition of families to the revised IHC care type***

In summary, the transition process for families will involve the following steps:

- The department will inform families of the engagement of the Transition Consultant and obtain consent from families to share their contact details with the Transition Consultant and with IHC Support Agencies (when contracted)
- The Transition Consultant will establish, in consultation with services engaged under the previous IHC program, a list of families that receive care.
- the Transition Consultant will make contact with all families to determine their ongoing child care needs and their eligibility for the new IHC program and future CCS requirements
- Services will inform families of the contact details of the relevant IHC Support Agency
- The IHC Support Agency will contact the family, and develop a Family Management Plan to identify their education and care needs and requirements for other support services,

including potential sources of support services such as the NDIS;

- The Family Management Plan will broadly reflect the outcomes of the needs analysis conducted by the Transition Consultant.
- The IHC Support Agency will recommend to the department places to be allocated to a suitable approved IHC service.
- The IHC Support Agency will refer the family to relevant support services including government-funded programs or other community-based programs.

For families who are no longer eligible for IHC, the Transition Consultant will help them to find other arrangements including other approved types of child care or other support services, where available and appropriate.

<b>4.</b> 4.1	<ul style="list-style-type: none"><li>• Whilst IHC families will be transitioned to the new model, those on the current waiting list should also be considered.</li></ul>
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