

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 (Jobs for Families Child Care Package) Bill 2016 and the Social Services Legislation Amendment (Family Payments Structural Reform and Participation Measures) Bill 2016

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), welcomes the opportunity to provide information and comments to the Senate Education and Employment Legislation Committee's inquiry into the Family Assistance Legislation Amendment (Jobs for Families Child Care Package) Bill 2016 and the Social Services Legislation Amendment (Family Payments Structural Reform and Participation Measures) Bill 2016.

ICPA (Aust) is a voluntary parent body dedicated to ensuring all geographically isolated students have equity of access to a continuing and appropriate education. This encompasses the education of children from early childhood through to tertiary. The member families of the association reside and work in rural and remote Australia and all share a common goal of achieving access to education for their children and the provision of services required to achieve this. Many of our families live on isolated stations, great distances from their nearest community with their only access to education, including early childhood education, being via distance education programs.

As a stakeholder focused on gaining equity for families accessing education while living and working in rural and remote Australia, ICPA made considerable contribution to the Productivity Commission's Review of Childcare and Early Childhood Learning in this area.

See Appendix 1 (ICPA (Aust)'s submission to the Productivity Commission's Inquiry into Future options for Childcare and Early Childhood Learning 2014).

The needs of families living in these locations differ considerably to those living in urban areas. If the review and government's response, is to truly make a difference to these families now and into the future, greater flexibility within programs is required, together with the broadening of measures within existing schemes such as the Assistance for Isolated Children's (AIC), which is intended to assist families whose children remain in their care while taking part in early learning programs and schooling through distance education. For the parents taking on the role of distance education tutor, (often the mother) they find themselves unable to take part in the workforce due to the enormous commitment which goes unrecognised financially by government.

While our organisation is pleased with many of the changes introduced, in particular the Nanny Pilot Programme which assists in meeting the needs of families unable to access mainstream child care services, ICPA's concerns are with the families who need assistance because the children remain in the care of their parents and they have no choice other than to educate their children through Distance Education schooling (including early childhood learning).

ICPA would like to highlight a number of areas where more work must be done to address the needs of families living and working in rural and remote Australia.

1. Nanny Pilot Programme

ICPA members are familiar with the In Home Care scheme and for many years have expressed the need for the carer to also fill the role of distance education (DE) tutor, when families are required to access schooling via DE programs. Neither the In Home Care scheme or the Nanny Pilot Programme allow carers/nannies to be involved in supervising school aged children while undertaking distance education lessons as this would be regarded as tutoring and not child care.

A common-sense approach in order to overcome workforce shortages in isolated locations, would be for the carer to also fill the role of Distance Education (DE) tutor. ICPA asks that changes be made to the following section, so families educating via DE schooling due to geographical isolation be exempt from this rule:

85BA Eligibility for Child Care Subsidy (CCS)

An individual is eligible for CCS for a session of care provided by an approved child care service to a child if:

- (c) The session of care:
 - (i) Is provided in Australia; and
 - (ii) Is not provided as part of the compulsory education program in the State or Territory where the care is provided.

2. Activity test requirements

Eligibility for fee assistance is determined based on how many hours each parent is engaged in approved work, training or study. Family eligibility for the Child Care Subsidy supports Australian Government policy objectives, including:

- supporting workforce participation
- ***supporting children's learning and development needs***
- targeting child care fee assistance to those who need it most including disadvantaged and vulnerable families and children

ICPA continues to raise concerns when it comes to meeting the requirements of the activity test for families required to teach their children at home. Supervising or educating children is not classified as either 'work, training or study' in regards to workforce participation but is a very clear example of ***supporting children's learning and developmental needs***.

Recent research conducted by ICPA indicated that of the 1500 families educating children through distance education programs, in 80% of cases it is the mother who teaches the program. On average this commitment lasts 9 years but for many it goes well beyond that. Under the Nanny Pilot Programme DE tutoring is recognised as voluntary work, however within the new guidelines this means **no** CCS is available after 12 months although the parent is still supporting the child's learning. Therefore, any concessions allowed under volunteering would be exhausted after the first twelve months.

Currently the Family Assistance Law provides for exemptions to the current work, training, study test criteria for CCB so that individuals or families in some circumstances can access up to 100 hours of subsidised child care per fortnight without activity. ICPA believes that these families meet the second policy objective indicated above (Number 2. Activity test requirements) as they are "*supporting children's learning and development needs*". These families must be exempt from the activity test as they too have legitimate reasons for not meeting the activity requirements.

3. Mobile Services Providers 194D Service Eligibility Rules

Consideration must be given to Mobile Services in rural and remote Australia, for example the Katherine Isolated Children's Service in NT (KICS), Outback Mobile Resource Unit in NSW (OMRU), Remote and Isolated Children's Exercise in SA (RICE) and other similar services which were previously covered by Budget Based Funding (BBF) and which will not fit the eligibility criteria for the new Child Care System. These essential services (including toy libraries and playgroups), for which families travel great distances to be part of, provide access for early detection of learning disabilities, health problems and enable socialisation with other children. Mobile Services are often the only access to early childhood learning and interaction that children living in rural and remote locations have. RICE is also a provider of 4 year old preschool education (Kindy of the Air). All of these services must be allowed to continue with appropriate funding thereby ensuring quality early childhood education for remote children in the future.

As these services are not 'child care' services where the children are being cared for solely by the service, there is serious concern that these mobile services are not eligible for continuation of funding under the new Child Care System and these services will be lost to families living in geographic isolation. For families who may live hundreds of kilometres from the nearest small rural town (which often does not have a child care centre), assurance that mobile services who provide early childhood learning and socialisation will be able to continue to offer their services is critical.

4. Working With Children Checks 195D Conditions for continued approval—working with children card

(1) It is a condition for continued approval of an approved provider that, for each individual required to hold a working with children card in relation to care provided by a child care service of the provider, the provider give the Secretary details of the card issued to the individual.

(2) For the purposes of subsection (1), a working with children card is a card that permits the individual to work with children under the law of the State or Territory in which the service is situated.

While ICPA agrees with the statements in section 195D, we are yet to see any progress on moving towards a national working with children's check. ICPA made the following recommendation to the Productivity Commission's draft recommendations:

DRAFT RECOMMENDATION 7.10

State and territory governments should, as a matter of priority, harmonise background checks for ECEC staff and volunteers by either:

Advancing a nationally consistent approach to jurisdiction-based 'working with children checks' as proposed in the National Framework for Protecting Australia's Children, including mutual recognition of these checks between jurisdictions,

Or implementing a single, nationally recognised 'working with children check'.

ICPA (Aust) supports this recommendation as a national 'working with children check' would assist those working across state boundaries. We have been promoting this for many years as it is detrimental to people working and volunteering across state borders to require several checks. This is

costly, time consuming and unproductive in an already stressed system. To streamline this process across Australia would make sense for already time poor families.

5. 198C Reduction of allocation of child care places by unused or unusable places

Special consideration must be given when dealing with services operating in unviable markets or disadvantaged communities. With the In Home Care scheme in mind, ICPA (Aust) would recommend that the total number of available places not be reduced as the places are often unused due to a workforce shortage or families being too isolated to be assessed, rather than not being in demand however, generally ICPA is in agreement with the proposed changes above. It would be sensible to reallocate the places into areas of need rather than to extinguish them entirely. While the In Home Care Scheme may be under-utilised in some areas, the opposite regularly occurs in rural and remote areas with a high demand for carers and places in homes often being left unfilled.

The Nanny Pilot Programme was welcomed by rural and remote families, but this has not been widely taken up by families living outside regional centres due to the unaffordability of the Nannies provided by Service Providers. Of the families that ICPA was aware of applying for the Nanny Pilot Programme, none have taken up and remained in the program due to cost. ICPA requests the continued provision of In Home Carers Scheme which provides carers who perform an essential and affordable service in rural and remote Australia.

6. Part 2. 5 and 6. Additional Child Care Subsidy Element 2: Temporary financial hardship

ICPA appreciates that the Australian government has recognised that families require additional support when their income is impacted temporarily. While the list included in the Regulation Impact Statement on page 41-42, is only indicative of situations that may lead to a family experiencing financial hardship temporarily, ICPA urges the committee to also include drought in this category. Drought conditions can last many years and have a huge impact on a family's ability to generate an income. It also places an additional workload on the family and if they cannot afford child care it means children must accompany their parents at all times, which in turn leads to children being in a workplace that is often unsafe for them.

Further comments

ICPA would now like to turn your attention to a couple of matters; while they may not be considered to relate directly to the Bills in question, they do impact rural and remote families enormously.

Our organisation is confronted on a daily basis by the drastic measures families are taking in order to: access child care, meet the educational needs of their children and meet the high out of pocket costs when one parent is removed from the workforce for many years. If these issues are not addressed, it could be considered that the needs of families comprising a large portion of Australia have been ignored in this review.

The Assistance for Isolated Children allowance was introduced more than forty years ago and is just as important today as it was when it was first initiated. ICPA has argued for some time now that this allowance must be expanded to include children taking part in early childhood programs within the Distance Education classroom and the role of the distance education tutor must be recognised financially.

7. The Assistance for Isolated Children's Distance Education allowance must be extended to include children taking part in early childhood programs in the year prior to starting school.

The only means of accessing early childhood education for approximately 280 children across remote Australia is through distance education programs. While states and territories have provided such programs, families living in remote areas wishing to access these are bearing the entire costs of administering them. The Assistance for Isolated Children's (AIC) Distance Education allowance must be extended to encourage families to take part in these particular early childhood programs.

Further information can be found in **Appendix 2** (Briefing paper- AIC for 4 Year Olds).

ICPA (Aust) recommends that the Senate Education and Employment Legislation Committee take the above factors into consideration to address the needs of families living and working in rural and remote Australia.