



Submission to the Public Inquiry into Childcare and Early Childhood Learning

The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to provide information and comments on the draft recommendations of the Childcare and Early Childhood Learning Productivity Commission Draft report.

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 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.

The issue of accessing affordable early childhood learning and care for families living in rural and remote regions has never been more concerning and is proving beyond the reach of many due to either no services being available, no staff available to fill positions and/or the high out of pocket costs exceeding the family budget. Our recent Federal Conference in Launceston saw more than double the usual number of motions received and debated by members from all over Australia, sending a clear message to those with the ability to make change; families in rural and remote regions value early childhood learning and want, and need access to affordable childcare.

For this reason we have included four case studies from real people with real issues. This is a snapshot from families who attended the Alice Springs School of the Air week during August 2014. There are many more stories exactly like these from all over Australia and we ask you to hear the pleas of these remote families who have been serving the agriculture sector for generations. Bush families are hurting and we are grateful to be given the opportunity to lodge our submission and let the Australian bush kids' voices be heard.

Following our submission to the Productivity Commission and attendance at the Productivity Commission's Public Hearing on August 26 2014, we feel that it is necessary to comment on the following six recommendations in the draft report.

DRAFT RECOMMENDATION 7.9

Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation. The quality standards in state and territory education legislation should broadly align with those in the National Quality Framework. Long day care services that deliver preschool programs should remain within the National Quality Framework.

INFORMATION REQUEST 12.10

The Commission seeks views on how best to transition to full state and territory responsibility for preschool delivered in long day care services as well as in dedicated preschools. This includes a transition to the provision of preschool at no cost to parents, in those dedicated preschools attached to public primary schools.

ICPA (Aust) can see some benefit in this recommendation, particularly in small or isolated communities where no services exist to provide a four year old program in the transition to formal schooling, where a school is the sole provider of education. While it may be considered expensive for government to deliver education to a few children in small towns, the costs should be seen as an investment in the future to counteract the costs of educating these children in the later years where taxpayers are currently paying \$40 -\$60,000 per student, per year, for secondary students to address remedial problems and bridge the gaps in education.

Early childhood education in small remote townships must have greater flexibility when it comes to meeting NQF requirements. It is important for States and Territories to broadly align with the NQF in order to maintain quality, programs and facilities. While a number of states have addressed this issue and deliver the 4 year old programs in schools, ICPA NSW has identified a number of remote towns which have no programs at all, despite there being vacant facilities at schools. It is claimed this is due to not meeting the NQF requirements.

ICPA (Aust) sees this as a positive step for dedicated preschools that could reduce unnecessary duplication of many regulations between the NQF and the State/Territory regulations. Shifting these centres to state government legislation would free up more time for assessors and hopefully speed up the entire accreditation process.

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

DRAFT RECOMMENDATION 8.5

Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny.

National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services.

Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.

In remote and rural regions of Australia it is hard enough to attract any workers, let alone those with qualifications. If recommendation 8.5 was to be implemented, this would reduce our recruitment pool to a minority within a minority – we would be looking for backpackers or students taking a gap year with formal education/child care qualifications. In either of these cases the position can only be filled in the short term which once again puts a burden on the families who require the care and financial assistance.

An Australian citizen with an (ECEC related) certificate III or equivalent responding to a position advertised in a remote location, as compared to an urban placement, would require financial incentives and fringe benefits at considerable out of pocket expense to the family hiring them. Some form of financial aid would be required by the family to be able to hire in this situation.

Remote families often staff these positions through sites like Gumtree or Helpx. Prerequisites for these nanny/early years tutoring positions are simple; a resilience to outback conditions, loyalty to the family and competent child care/education skills. If we ask for more than that we will get few or no applicants.

CASE STUDY ONE

'I have been on the waiting list for the Longreach In Home Care Scheme for the last five years. We moved to town briefly after being unable to receive financial support to care for our children, but Alice Springs rental proved even harder to sustain financially and there was a shortage of childcare places in town as well.

My children are now 6, 8 and 13. My 13 year old has complex needs and multiple disabilities having caught meningitis as an infant. He is now in care in Alice Springs as we could not keep a carer in the bush. No one would apply for the position, caring for such a difficult client in a remote location – no mobile phone, limited access to Facebook, no workers wanted to apply. The only carers I have been able to attract for him over the years out here were backpackers who could only stay for a maximum of six months, due to their visa restrictions. This year we have placed him in care in town to attend the Special School. He can't walk, talk or see and I am not with him, simply because I cannot attract long-term carers to the position. With a review of the Working Visa programs my son could come home.

I have resigned from my job as a teacher in remote indigenous communities because I could not afford to pay a Governess for my sons who are still at home, so I now teach my younger sons through distance education myself and earn no income.

Families here on the Plenty Highway go through Longreach as an IHC provider because we don't have one based in Alice Springs. This means we take up QLD places, which are limited anyway. It also means that our childcare workers have to get a QLD police check done, which is an added expense if they have already got their Ochre Card here in the NT.

Families who can't access the IHC subsidy due to lack of positions must care for their children themselves. My husband banked \$47 000 last year and I earn nothing. He is the Manager of a tourist park, 140km from Alice Springs. We don't own a cattle station, we simply live and run a business in a remote area in Australia. As low income earners we are entitled to a child care subsidy but have no local provider. My children are now school age and I have to teach them, so I can't work. The cost of paying a governess's wage, accommodating and feeding her, would absorb my salary anyway.

My children are fifth generation Plenty Highway kids and third generation Alice Springs School of the Air students. My Dad was listening to the very first broadcast of Alice Springs School of the Air in 1951 - he was six. My great grandfather was a member of the committee that lobbied The Flying Doctor and the Government to use radios to educate bush kids. The bush is my home. I have the right to live in my 'country'. In this day and age there should be supports in place to ensure my children have an equitable education no matter where they live. Instead I am out of pocket and my oldest son is without his mother.'

DRAFT RECOMMENDATION 8.6

The Australian Government should remove the In Home Care category of approved care, once nannies have been brought into the approved care system.

As evidenced in Case Study One, the In Home Care scheme is the main provider for childcare for families living in the remoter regions of Australia and must continue in order to address the needs of these families. There is a real urgency for this scheme to be expanded as the scheme is not meeting the demand for this service and more places need to be available, particularly in times of crisis. Placing greater demands on carers to be accredited will impact both the attraction and retention of staff for this scheme which is already difficult to staff.

ICPA (Aust) is alarmed by the Productivity Commission's draft recommendation that in home carers be qualified as per the NQF especially for our remote families who use IHC to care for younger children, while the mother is responsible for the education of the older children, and for after school care when they are working on the property. As you will be aware many of these remote places are run by a single family, many hours from any town and it is already very difficult to source anyone to work in these areas so many families resort to backpackers. Adding an extra layer to the requirements we feel will mean there is almost no chance of anyone being able to use the service.

Assistant Minister for Education Sussan Ley reported on June 24 2014, that the review of the child care National Quality Framework (NQF) could not have come at a better time, with the national regulator ACECQA reporting a 43 per cent increase in the number of services needing staff waivers because they could not meet NQF qualification requirements; and one-in-five services risk not being able to hire an early childhood teacher to meet the NQF's mandatory requirement due to a major skills shortage. This appears to be in direct opposition to recommendation 8.5 and 8.6 to require more qualified workers to work in remote areas.

At the Productivity Commission's Public Hearings, it appears from the transcripts that the prevailing attitude is that these people/ backpackers were somehow stealing work from those providing care services and so care services are insistent that nannies should be accredited. Our remote families do not have any other alternative due to the distances involved.

As the following case studies show families face enormous difficulties when accessing early childhood education and care. There is the initial difficulty getting on the list to get a carer, then finding a carer who meets the scheme's requirements (ABN, First Aid certificate, particular work scheme for state e.g. Blue card and WWCC), difficulties in staffing due to the personal/ close nature of the job- you need someone you can get along with, the need to live-in causes its own problems, the lack of outside/ offsite entertainment is also a negative for the carer and there are substantial out of pocket costs for the family.

CASE STUDY TWO

'We live eight hours drive from Alice Springs on the Tanami Highway, almost on the border of the Northern Territory and Western Australia. My children are third generation Alice Springs School of the Air (ASSOA) students. I have not even applied to the Longreach IHC scheme because all my friends have been on the waiting list for years.

My oldest son is in Year One and I have a daughter in Preschool, both through ASSOA. I also have a three year old boy and an eleven month old daughter. Last year I taught my son Transition with two toddlers in the school room while I was breast feeding the baby.

This year I have the older two doing school, the baby is mobile and the toddler is becoming a handful. I managed for Semester One, in between cooking for staff and helping with the muster or getting to town for In School Week. Finally it became too much and I have hired a Home Tutor. This is at great expense and uses much of my husband's income. Our property is a family concern and we have a large family, so each family only receives a small wage.

I still work on the station and have the little ones with me while I work. This is not a safe or constructive early learning environment for my kids and we are miles from anywhere if someone gets hurt.

This we discovered when my brother in law was injured in a helicopter crash and became a quadriplegic. He now travels the world in his wheelchair researching means for giving disabled pastoralists access to equipment to enable equitable involvement in working their property - and yet we can't access any assistance to care for our kids to give them a head start to a bright future.'

CASE STUDY THREE

'I am married to an Arrernte man who comes from the Sandover Highway. We live in a small homeland settlement. He is an artist and runs a Store here. Our three children are in a Year 1, Preschool and our baby is just five weeks old.

I am not on the waiting list for IHC because there are no places anyway. I didn't do much at school and now I am teaching my own kids and my baby is with me. My kids speak Aboriginal English. They write and spell like that too. I can't afford any childcare and I don't even have a room or accommodation for a nanny or home tutor. There is no school here and besides I want my kids to have a mainstream education through Distance Education. The ASSOA teachers give me lots of support. It would be hard for my kids to attend a community school even if we had one here because they are of mixed race and don't speak Arrernte or Alyawarre. I am all my kids have got.'

CASE STUDY FOUR

'Our oldest son is a third generation School of the Air Student. He is in Year Four. Our little boy is three. We have not had access to the In Home Care Scheme because we are too far from Longreach. We are three hours north of Alice Springs. I did not access the IHC funding when my oldest was a toddler because it did not exist for us then. The Northern Territory only got access to Longreach IHC about four years ago.

There are never enough places. I am a pilot so I am always flying on the station. We privately pay a Governess AND a nanny. The boys are too far apart in age for one carer to have them together. This is a cost of two full salaries and accommodating and feeding two people, to care for just two kids. A huge expense. There is no other option for us. That is how we care for our kids, while our urban counterparts receive financial assistance.'

DRAFT RECOMMENDATION 8.7

The Australian Government should simplify working holiday visa requirements to make it easier for families to employ au pairs, by allowing au pairs to work for a family for the full 12 month term of the visa, rather than the current limit of six months.

ICPA (Aust) supports this recommendation and asks that it be extended to include not only au pairs but also staff hired in rural and remote areas to care for or teach isolated children (referred to as nannies or governesses.) We are also asking that this type of work be included in the 'rural work' category that allows for a 'second year' visa. We believe that these visa changes would enhance the In Home Care Scheme for distance education children.

For many years members have raised concerns about the difficulty of finding suitable people to employ in their homes to provide childcare or to teach the children of families residing in rural and remote Australia who must be educated by distance education.

Distance education tutors and childcare workers such as a nanny provide a valuable service to many families residing on rural properties as they release the mother to undertake essential duties involved in the running of the farm or station business. Due to geographical isolation there is a distinct lack of Australian workers let alone qualified childcare and educational workers who are willing to undertake work where the remoteness is an issue.

A solution to this employment problem is to extend the current list of occupations qualifying as rural work for people entering Australia on a 1263 Working Holiday visa. Along with widening the available employment opportunities for these travellers, it would increase the employee pool for rural families and assist them to fill these positions on offer. The current employment guidelines for a second Working Holiday visa are that applicants must complete at least three months (88 days) of specified work in regional Australia.

For a foreign nanny, governess or au pair to legally work in Australia it is an extremely difficult task. The visa application 1263 does not include these occupations so they are not an approved work activity. Currently, the list includes agriculture, mining, construction and fishing. ICPA Australia would like to see this visa revised and In Home Care and governess work included as accepted employable occupations for rural families.

To further assist and meet the needs of families educating via distance education, government must introduce greater flexibility in the IHC guidelines to include an educator role. Currently, the guidelines only allow for carers for under school age children or out of school hours care for older children. In remote areas parents cannot 'go to work' while their children are taking part in distance education school lessons as they are required to supervise the school work. This carer is a live-in position and it would seem sensible that if they continue as the educator through the day into school time, there would be no need to have a second person to supervise the school work.

In October 2013, a letter from the Minister for Immigration and Border Protection, Hon Scott Morrison MP, the request to expand the range of eligible specified work activities was addressed. It was stated that the second Working Holiday Visa initiative was established due to 'the presence of a persistence of labour shortages,' and that 'the program is not a work visa program and is not a long term solution to structural labour shortages.'

It is the belief of ICPA (Aust) that there *is* no long term solution to labour shortages in remote and rural areas and families who have played a vital role in the agricultural economy of Australia for generations have therefore been unable to provide equitable education for their families due to the limitations of this visa. We believe this is the reason that the Government has recently announced a review of 457 visas for temporary foreign skilled workers. Senator Cash has made a commitment to 'evidence based productivity reform'.

DRAFT RECOMMENDATION 12.9

The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program of 15 hours per week for 40 weeks per year. This support should be based on the number of children enrolled in state and territory government funded preschool services, including where these are delivered in a long day care service.

The Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool.

ICPA (Aust) concurs with this recommendation and asks that this support be available to all four year olds regardless of which combination of service they can access. ICPA (Aust) believes there should be federal funding for all four year olds to be able to undertake the 15 hours per week as promised in the universal access program. It must be recognised that due to the complexities of rural and remote Australia some areas use blended deliveries. A per child subsidy base, possibly accompanied by an additional loading to cover the additional costs encountered in rural and remote areas, would allow these services to determine where they could supply a service. These services need to have a surety of funding to be able to continue, this currently does not exist.

Various forms of early learning are offered in small rural communities and for those living beyond these communities. ICPA acknowledges that these programs can be difficult to access in both metropolitan and rural and remote areas. ICPA believes the impact of not being able to access early learning for children living beyond the metro boundaries is evident in the gap between educational outcomes for rural and remote students when compared to those living in large centres. Much of this can be attributed to learning difficulties going undiagnosed in the early years and having very limited opportunities to socialise and interact with other children.

Mobile Playgroup Services

For many years, various mobile children's services have delivered the important services of social contact, professional advice, play, early childhood programs and developmental opportunities for children and parents in small rural communities and outlying, often very isolated, areas. In many cases, these services provide the only face to face interaction for children of similar ages. Flexibility and surety of funding for these services is vital in providing the much needed socialisation component of early childhood programs for these communities.

Extending Assistance for Isolated Children's Scheme (AIC) to include Early Childhood Programs

In areas of very sparse population, a family who access recognised 4 year old programs in their homes through distance education, which today includes a mixture of hands on play based learning and involves the use of communication technology, are effectively blocked from any funding to assist with meeting the costs of program delivery.

Presently the Distance Education allowance within the Assistance for Isolated Children's Scheme (AIC) assists with both the set up and ongoing costs pertaining to the schoolroom as well as enabling access to school activities conducted away from the home schoolroom. However, the AIC Scheme does not recognise as eligible for payment, enrolled students undertaking a distance education program for four year olds. The costs associated with setting up, maintaining and resourcing a schoolroom for delivering an early childhood program are the same as those encountered in delivering a distance education program for the formal schooling years. Financial assistance is essential to ensure distance education early learning programs are affordable.

Distance Education four year old students need to be recognised as undertaking a preschool program and the AIC scheme extended to them as no other service is available to this group. ICPA (Aust) believes that for '**a transition to the provision of preschool at no cost to parents**' to be effectively initiated across Australia by our current Government, the AIC allowance must be extended to cover '4 year old programs.'

In rural and remote communities Australia wide early childhood education and care is still vitally important. It is more difficult to meet the conditions of the NQF but these children still need to have the opportunity to access 15 hours a week of education. For very isolated children this means socialisation as this is what they cannot obtain at home. Services to provide the opportunities for socialisation must be maintained or improved upon. ICPA (Aust) is very concerned that in rural and remote communities, the viability of existing early childhood services and care, and the establishment of new EC services and care, where required, will be jeopardised by any alterations to federal funding as a consequence of draft Productivity Commission recommendations and we ask that this small group of children be considered just as carefully as the larger groups in the cities.