

REMOTE AND RURAL FAMILY CHALLENGES

Although the IHC hourly rate CAP is a hot topic amongst these families, the remote and rural families are most worried about 3 things

1. December 31st and whether the transitional provision period will be extended.
2. The scope of the IHC not permitting remote and rural Educators to supervise children enrolled in state approved distance education.
3. The ambiguity surrounding whether Primary teaching degrees are or are not acceptable qualifications.

1. DECEMBER 31st Looming

Transitional provisions for IHC educators working in remote and very remote area. 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 31 December 2023.

(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

(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.

Many families have approached us expressing that their unqualified educators, who are receiving support from qualified mentors, as well as those Educators who are working toward a primary teaching qualification, will not be able to continue to provide care past the 31st of December. Some Educators are already starting to panic and search for alternate work, leaving the remote families without care. 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 educators in remote and very remote areas. The difficulties have increased if anything, so the removal of this transitional provision will further isolate the children living in remote areas and create even more disparity in early educational equality for children whose parents are toiling our great land to provide Australian grown produce for the Australian population.

If the Minister does intend to extend the provision, delaying the announcement of the extension is highly likely to result in the families losing their current educators who are already showing signs of concern. Is there any way that you could indicate your intentions as early as possible please?

2. SUPERVISION OF Approved Distance Education

Remote IHC Educators who have historically provided 5 x 10 hour days of In Home Education and Care to isolated children whilst their parents work the land, are not permitted to provide Education Supervision to the children once they are enrolled in State approved Distance Education.

Commonwealth funding is provided to state and territory governments for the purposes of providing distance education, including School of the Air (on air and off air) arrangements. Families cannot receive child care subsidies during the time a child is engaged in formal schooling, including for a tutor or governess to supervise the provision of distance education where the care (or part thereof) is for the purpose of the child to undertake a state or territory education program. This longstanding policy is stipulated in section 85BA(1) of the A New Tax System (Family Assistance) Act 1999 and further clarified in Part 2, Section 8 of the Child Care Subsidy Minister's Rules 2017).

The Ministers above rule - results in remote parents having to reduce their work participation and family income to supervise the children's participation in Distance Education. Alternatively families have to self-fund the physical supervision of their children whilst they undertake Distance Education, which is not a cost that other Australian families have to bare. The very minimal Distance Education Allowance of \$4678 barely covers the classroom set up costs and materials let alone covers the cost of the parents loss in income or the wage costs they would incur to provide supervision themselves.

A provision for CCS to be paid for children attending IHC sessions of care in remote and rural areas where the Educator is providing supervision to children engaged in Public Distance Education Schooling. In recognition that the parents of children who live in remote areas should not have to forgo paid work to stay home and supervise Distance Education

nor should they have to personally pay an Educator to provide that supervision, as it is every child's right to free public schooling no matter where they live.

The families have asked me to share how in equitable this is, they feel that remote families shouldn't have to personally fund the physical supervision of their children in the classroom.

Families have asked us to share the definition of homeschooling verses Distance Education. Siting that homeschooling is a choice, which shouldn't be within the scope of the IHC program and that Distance Education provides schooling for students who are unable to access a local government school. In Distance Education, the school and teacher are responsible for developing, implementing and evaluating student learning programs.

Remote families want the Minister to make a provision for isolated children to continue to receive CCS during sessions of In Home Care so that their IHC Early Childhood Educator can supervise primary educational implementation whilst increasing remote parental work participation.

Please also have a little look at page 23 of the Isolated Children's and Parents Association conference agenda, it mentions the need for the Distance Education Allowance to be increased. For the same reasons CCS should be applied to Public Distance Education schooling for children living remotely where both parents are wanting to continue working even though their children are about to start primary school. Perhaps if a family is accessing CCS for Distance Education Supervision through the n Home Care program, it may mean that they cannot also access the Distance Education Allowance as well. Just some thoughts.

https://icpa.com.au/sites/default/files/inline-files/2023%20ICPA%20Federal%20Conference%20Agenda%20Motions_1.pdf

3. PRIMARY TEACHING Qualifications

Families are concerned that the IHC guidelines are ambiguous and are asking for clarification. If CCS can be applied to Educators who are providing supervision for Distance Education, then allowing primary school teaching qualifications to be acceptable for IHC would significantly increase the quality of education and care provided to remote children. Even if CCS cannot be applied to remote IHC sessions of care, the quality of Education that can be implemented in both the before and after school IHC sessions would be much more appropriate and effective given that children up to 13 years of age access this program.

Qualifications approved under the NQF are deemed acceptable qualifications for IHC educators. It is important to note that the qualifications for working with school age children listed on the ACECQA website are not acceptable qualifications for IHC educators.

ACECQA also publishes a list of approved first aid, emergency asthma and anaphylaxis qualifications, which are also acceptable additional requirements for IHC educators.

The primary school teaching qualifications of educators registered with the state and territory education boards/ state-based Teacher Regulatory Authorities are also deemed as acceptable qualifications for IHC educators.

Clarification of the above would be great.

FEE SCHEDULE INFORMATION

Find below a redacted list of the average hourly fee schedule of \$47.46 for the upcoming year. The fee schedules charged for each educator - that in the employer model should include ALL costs - and with the contractor it would reflect ALL costs LESS costs that the family and educator are responsible for, see dot points below the table.

	\$48.25
	\$50.61
	\$48.25
	\$48.78
	\$47.92
	\$34.23
	\$49.63
	\$46.41
	\$45.56

	\$51.00
	\$44.84
	\$50.06
	\$45.56
	\$46.95
	\$42.15
	\$46.94
	\$49.31
	\$49.63
	\$51.06
	\$46.94
	\$46.53
	\$44.64
	\$49.63
	\$46.66
	\$47.92
	\$45.56
	\$52.45
	\$46.94
	\$35.46
	\$46.95
	\$45.56
	\$46.95
	\$46.95
	\$46.94
	\$46.95
	\$46.95
	\$46.53
	\$49.92
	\$50.61
	\$45.56
	\$45.56
	\$50.61
	\$46.03
	\$47.56
	\$48.25
	\$46.94
	\$47.56
	\$50.25
	\$47.45
	\$45.56
	\$46.95
	\$34.84
	\$47.40
	\$46.95
	\$41.59
	\$48.33
	\$47.56

	\$46.35
	\$47.24
	\$51.99
	\$54.73
	\$45.56
	\$45.56
	\$47.56
	\$46.94
	\$42.14
	\$45.56
	\$50.61
	\$49.42
	\$51.78
	\$46.95
	\$37.34
	\$46.94
	\$56.50
	\$45.56
	\$54.21
	\$51.99
	\$54.39
	\$55.95
	\$55.95
	\$45.85
	\$46.94
	\$45.56
	\$45.56
	\$49.42
	\$47.46

Note that families who typically would be charged a higher fee schedule (those requiring non-standard hours, experienced carers, split shifts, shorter shifts) don't move forward with the program due to the high out of pockets. If the IHC CAP was higher, the out of pockets for these families would reduce, pushing the average fee schedule up. 75% of the families who do not move forward with IHC, site that it was due to not being able to afford the out of pocket expenses.

With relation to the below image, I believe that the difference between the for profit and not for-profit is as follows.

Not-for-profit

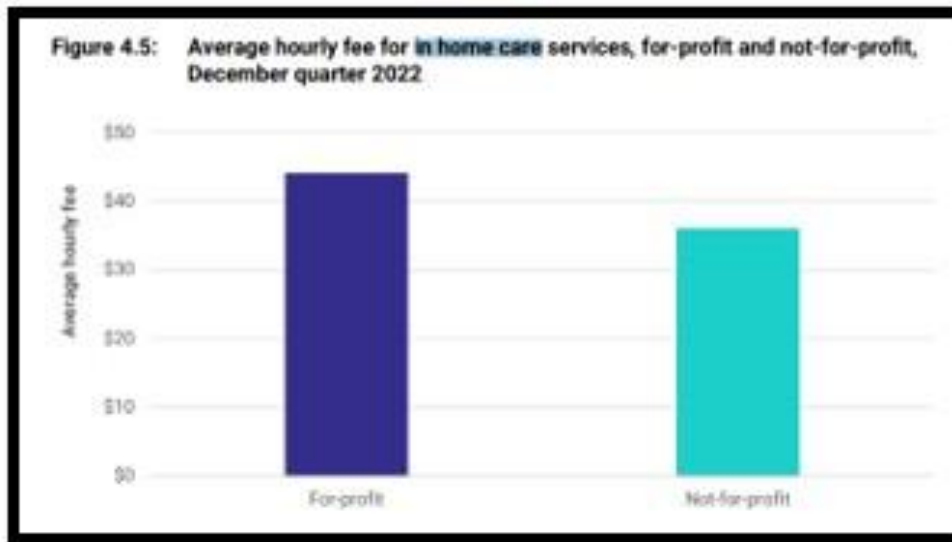
- Primarily are contractor model
- The parents have to fund the work cover themselves
- The educators have to fund the public liability insurance themselves
- The educators historically make their own super contributions
- The educators are typically paid well below award wages
- Not-for-profit aren't charged payroll tax costs therefore don't have to on-charge it
- Unskilled Families and Educators are responsible for administrative tasks related to tax, super, insurance, recruitment, screening, background checks etc.

For Profit

- Primarily are Employer model

- Educators are paid award wage
- Educators are covered by insurance
- Educators are paid Super
- Educators are covered by Work Cover
- All administrative tasks related to tax, super, insurance, recruitment, screening, background checks etc. are undertaken by the Service
- The service is charged payroll tax costs

(one thing that would bring these ever so slightly more into line, would be to have IHC Services be made exempt from having to pay payroll tax, for the Educator proportion of their payroll list)



DATA COLLECTION FOR ASSESSMENT of the In Home Care Program

After looking at the ACCC’s interim findings, which state lack of access to IHC data. We believe that the data they seek, could be easily provided by individual service providers. Given that there are only 39 IHC providers nationally, each should be able to extract all sorts of data that will provide a much better picture regarding:

- The number of shifts and length of shifts worked by each educator for specific periods (attached “Average number of shifts and lengths” is data for 17th to 30th OCT 2022, showing 88 Educators and that they worked an average of 2.88 days a week, and the average shift length was 7.9968 hours) Note that the average number of days per family would be greater due to some families having multiple educators and replacement educators when their regular one is not available.

Number of hours worked in fortnight	Number of shifts that hours were worked in fortnight	Average length of Shifts worked in fortnight Educator	Average number of shifts worked per week
8	1	8	0.5
9.5	1	9.5	0.5
6	1	6	0.5
11	1	11	0.5
8	1	8	0.5
16	2	8	1
16.5	2	8.25	1
20	2	10	1
12	2	6	1
20	2	10	1
24	2	12	1
19.5	2	9.75	1
42.5	3	14.1666667	1.5

34.5	3	11.5	1.5
23.5	3	7.833333333	1.5
24	3	8	1.5
30	3	10	1.5
30	3	10	1.5
21	3	7	1.5
41	4	10.25	2
31.5	4	7.875	2
18.5	4	4.625	2
38	4	9.5	2
32	4	8	2
30	4	7.5	2
40	4	10	2
34	4	8.5	2
40	4	10	2
40	4	10	2
38	4	9.5	2
34	4	8.5	2
32	4	8	2
36	4	9	2
30.5	4	7.625	2
48	5	9.6	2.5
49	5	9.8	2.5
50	5	10	2.5
50	5	10	2.5
25	5	5	2.5
48	5	9.6	2.5
65	6	10.83333333	3
27.75	6	4.625	3
42.5	6	7.083333333	3
60	6	10	3
42	6	7	3
54.75	6	9.125	3
48	6	8	3
64.5	7	9.214285714	3.5
60.5	7	8.642857143	3.5
73.5	8	9.1875	4
76	8	9.5	4
34	8	4.25	4
59	8	7.375	4
36	8	4.5	4
80	8	10	4
72	8	9	4
61	8	7.625	4
64	8	8	4
60.5	8	7.5625	4
88	8	11	4
93	9	10.33333333	4.5
76.5	9	8.5	4.5

90	9	10	4.5
90	9	10	4.5
89.75	9	9.972222222	4.5
46.75	10	4.675	5
76	10	7.6	5
76	10	7.6	5
98	10	9.8	5
100	10	10	5
100	10	10	5
100	10	10	5
100	10	10	5
100	10	10	5
100	10	10	5
99	10	9.9	5
85	10	8.5	5
77	10	7.7	5
65.25	10	6.525	5
80	10	8	5
100	10	10	5
75.5	10	7.55	5
94	10	9.4	5
96	10	9.6	5
100	10	10	5
90	10	9	5
59.75	10	5.975	5
100	12	8.333333333	6
100	12	8.333333333	6
		7.996833664	2.880208333

Below are the reasons that Educators are highly unlikely to be able to provide accurate data for assessment.

- Many educators may say they are employed when in fact they are contractor, some don't even really understand what an ABN is and often find they haven't kept adequate records at the end of the financial year, resulting in their accountant submitting earnings under their TFN instead.
- Many educators providing care for families enrolled with Contractor Model Service providers, accept hourly rates prior to realising that the Service Provider expect them to pay their super out of the rate, their own insurance, their own work cover, third party subscription fees etc the fee schedule recorded by the Service Provider is rarely a figure that an Educator would be able to site.
- Fee Schedules entered in to third party software for CCS claiming are different to the hourly rates paid to Educators.
- Educators don't set the fee schedule, the contractor Educators however can choose their hourly rate which the service provider may say cannot be below a certain amount. The fee schedules are entered by the Service provider into the 3rd party software, the fee schedules include the hourly rate that the Educator will receive, PLUS many other things such as Super, Payroll Tax, Insurance, Work Cover, admin fees, subscription charges etc.
- Educators are quite unaware of the IHC hourly rate cap, or the CCS amounts that the Services receive to subsidise the full cost. Due to the IHC CAP being so low, Educators from both Employer and Contractor models are often asked by families to lower their wage rates so that the families don't have as much GAP fee to pay.
- Families who suffer financial hardship, can place Educators who work as Contractors under duress by sharing personal information about their financial circumstances, guiltting the Educator in to accepting rates lower than the award or even the minimum National Employment Standard wage. Due to the intimate nature of the working relationship, Educators can fear that if they don't comply that they will lose their jobs.
- Non Standard hourly rates are set based on award expectations, the Contractors are often pressured by families and services to accept well below the award rates to make the program affordable for the families. This practice is not legal, there are a lot of blind eyes turned by service providers when Contractors agree to reduce or drop below the standards.

- The Employed educators have pay level annual anniversaries where the award states they should shift up a level, families beg the educators to tell the service not to do it, but fair work requires it. The Contracted educators are more likely to allow families to place pressure on them and under duress or naively accept hourly rates that are well below the NES.
- Services are responsible for collecting relevant information to enrol the families/children not the educators, so Educators would not understand or be able to describe any enrolment challenges that families may face.
- The In Home Care National Guidelines and In Home Care Handbook suggests that Educators can access professional development opportunities provided by the Service Providers and Support Agencies, there really isn't anything at all offered by the Support Agency's. NSW does the best job.

The educator is required to: • maintain the necessary checks • 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. The educator should utilise the professional development support offered by the IHC Service and the IHC Support Agency where possible.

The IHC educators are required to: • meet the IHC qualification requirements, and have a sound understanding of early childhood development and the child's education and care and other support needs; and participate in professional development activities offered by the IHC Service and participate in the communities of practice hosted by the IHC Support Agency

2.4. Key elements of IHC The 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 the eligibility criteria for accessing the IHC service type • to move towards a more equitable distribution of 3,200 places • a CCS family hourly rate cap of \$33.171 per hour • a 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 additional support services beyond early childhood education and care, such as disability support funded through Commonwealth or state and territory government programs, respite care and allied health services, where required • minimum qualification requirements for educators and support for their professional development.