



Submission

to the

National Child Safety Review

from the

Federal Council

of

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

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ICPA (Aust) is a voluntary, apolitical parent body dedicated to ensuring all geographically isolated students have access to the services required for an equitable, affordable high-quality education, from early childhood through to tertiary and training. The member families of The Association reside and work in rural and remote Australia and all share a common goal of achieving access to an equitable education for their children, despite their geographic location. They often live great distances from services required to support the education of their children and therefore need specifically designed rural and remote programs that allow these children to learn, develop and thrive.

A nationally coordinated approach is crucial for ensuring child safety in education and care services. Government intervention in creating a standardized approach is necessary to address inconsistencies across jurisdictions. Reform is needed to align existing child safety systems.

Specifics about your experiences of the context

The plight of rural and remote families who have limited access to early childhood education and care and are limited in their choices for primary and secondary education, continues to be a grave concern for ICPA (Aust) members across the country. While an array of initiatives is required to address this reality, it is imperative that any additional child safety mechanisms do not inadvertently further disadvantage these children or result in fewer rural and remote services. These geographically isolated children face a unique disadvantage in the pursuit of quality education which should be recognised and rectified, not further exacerbated by red tape and regulation that is not able to be practically implemented in the rural and remote settings. Regulatory options that have been posed for the purpose of this review indicate that penalties will apply for non-compliance. ICPA (Aust) ask who will administer, impose and follow up these penalties? Reform needs to ensure this burden of time, energy and resources does not fall to the educational staff at the rural and remote centres and schools as that will further disadvantage the children in those settings by removing or over-working staff, where there is limited qualified staff available.

EARLY CHILDHOOD EDUCATION AND CARE (ECEC)

Currently, insufficient funding of remote and very remote early childhood services providing Childcare Subsidy Model childcare does not recognise the unique funding needs of these services and additional financial burdens of some of the proposed child safety policy options will render these services unviable. These service providers are capped at the maximum amount of Community Child Care Funding (CCCF) Sustainability funding they are able to apply for (\$200,000 pa) despite the operational gap they are able to demonstrate, which is often significantly larger. Remote and very remote services have to meet significantly higher staffing and operational costs – such as providing housing for teachers and meeting the pay package parity gap necessary to attract and retain adequately qualified teachers. Early Childhood Services in remote and very remote locations need to be able to provide a service with teachers and staff at the same level as their city cousins. Rural and remote children often have significantly more vulnerabilities according to the AECD (Australian Early Childhood Development) Census Data therefore require additional funding of Early Childhood Services. Both operational and infrastructure funding models are inadequate for rural and remote ECEC centres to remain viable and provide quality services. ICPA (Aust) implore decision makers to ensure that additions to obligations resulting from this review are completely and adequately funded so as not to set these already financially strapped services up for failure.

SMALL RURAL SCHOOLS

There is a dearth of experienced teachers wanting to work in rural and remote areas across Australia due to the demands placed on them by the role, particularly of one teacher/teaching Principal schools. This is exacerbated by the physical and professional isolation with little to no support. Further burden placed on these over-worked professionals through the introduction of some of the proposed policy options, without appropriate administrative support, will result in fewer teachers wanting to take up these roles, impeding the educational opportunities of rural and remote children, disadvantaging them further.

BOARDING SCHOOLS

Many rural and remote families have no choice but to send their secondary school aged children to boarding school to complete their compulsory education, often paying high fees. While the safety of these children living on campus is paramount, the setting of the policy options from this child safety review need to consider the impact of new regulations and obligations on boarding school fees. It is important for boarding schools to be held accountable for the safety of the children in their care so any new regulation should account for and cover the safety of boarding students at government and independent schools. Students are also subjected to the actions of other students, particularly in the boarding school setting, which needs to be addressed by staff training, their obligation to act and the boarding schools' responsibility to protect children from all harm.

Theme 1: Management of digital devices

Increasing protections around the use of digital devices among those working with children, particularly on the use of personal digital devices, would make a perceived improvement in the risk of harm to children if this can be implemented and monitored effectively which requires administration and management time. Rural and remote ECEC centres and schools are already inadequately staffed in many cases due to the dire shortage of qualified educational workers in rural and remote Australia and inadequate operational funding. ICPA (Aust) seek to highlight the inequitable financial and administrative burden placed on small rural and remote ECEC services and schools in having to implement a blanket approach to the management of digital devices. Educators the In Home Care (IHC) program caring for children living in geographically isolated areas are often working alone with the children in an isolated place where their personal mobile phone might be the only form of communication so it is critical they have access to a device if option three is enacted. Option two and three place extra financial burden on the IHC provider or educator and small school budgets so for these options to be effective financial support would need to be provided.

ICPA (Aust) believe devices used by children must be set up to reflect the age of the user, regardless of the education facility's desire for the students to be able to access software of a higher age limit. There should be safeguards around devices used by multiple students, of different ages, that would stop younger students being exposed to material or software accessed by older students. For schools and centres to implement these child safety measures into their IT systems they will require the support of quality, vetted IT professionals, who are often very difficult to access in regional and remote locations.

Most children attending boarding schools have at least one digital device for their own communication needs. School policies, protocols and boarding house supervisory staff training needs to consider the management of these devices to ensure all children's safety in these settings.

Theme 2: Child Safety Training

Changes to strengthen child protection provisions regarding training and knowledge in addition to introducing nationally consistent and mandatory child safety training would set the foundation for better child safety outcomes.

Implementation of options two to five are optimal for rural and remote settings. It is burdensome to expect every rural and remote service provider to schools and ECEC centres (option six) to have mandated child safety training even when they are not working with children. Child safety training needs to be delivered at no cost especially to volunteers and consistently across all States to staff working directly with children. Inconsistent training regimes across Australia create duplication and lack the productivity required for a secure and effective child safety system.

Theme 3: Responding to educator and staff member conduct

Making inappropriate conduct an offence will enhance Regulatory Authorities' ability to share information on prohibition notices, suspension orders, and enforceable undertakings with approved providers, and enhance the effect of regulatory responses to educator and staff member conduct. Option three of amending the National Law to introduce inappropriate conduct as an offence, allowing for regulatory action is the only effective option for creating meaningful change. Option two allowing for the development of resources to encourage approved providers to address inappropriate conduct in their policies should complement the changes in legislation and support staff in implementing the new laws.

Any small possibility that prohibited persons or suspended educators might be inadvertently employed because of the lack of information sharing of their previous offences needs to be eliminated. ICPA (Aust) support options two and three in the enhancing "*Regulatory Authorities' ability to share information with approved providers*" section.

Theme 4: Working with children checks

A nationally consistent approach to Working With Children Checks (WWCC[1]) requirements and practices in education and care services is paramount to an effective child safety system. This includes requirements for a valid or registered WWCC before commencing a role in an education and care service and notifying a change in WWCC status.

Early childhood education and care employees and distance education home tutors travel and work across rural and remote parts of the states of Australia and must apply for, pay for, and wait for the processing of, a different working with children check in each state. This results in lengthy delays causing disruptions and risks to the care and education of rural and remote children. It also results in disruption to children's learning in some cases. A mother who lives in Queensland and due to logistical reasons, her children are enrolled in Distance Education through South Australia (SA) had a specialist teacher organised to visit her family to help her son with some learning difficulties and at the eleventh hour that arrangement was cancelled as that teacher had a South Australian WWCC that was not recognised in Queensland. As a result, this student is still waiting for specialist help. The inefficiency of the current child safety system is creating inequity in access to education in rural and remote Australia.

ICPA (Aust) implores the current government to prioritise, as a matter of urgency, the collaboration with

States to develop, as a joint responsibility, options for national reforms to enhance child safety and reduce regulatory barriers around WWCC. An efficient and effective national working with children check should ensure higher standard of safety is achieved therefore less other regulation will be required. Getting the staff screening right is the frontline issue which should create the backbone of child safety in Australia.

1. WWCC is used to represent working with children checks and working with vulnerable persons registration (WWVP), in addition to equivalent checks across states and territories.

Theme 5: Improving the safety of the physical service environment

The design and maintenance of service premises in rural and remote areas needs unique consideration to facilitate continuing safe and education and care.

While in urban settings it might be appropriate for option four, these regulatory changes would result in no education and care being delivered in some rural and remote settings where there ~~is~~ are no premises that fits the exact criteria for adequate supervision of children. Rural and remote settings need continued access to, at the least, temporary waivers as proposed in option three to allow for renovations to be completed without completely moving from the premises as the situation could be that there is no other premises to move children to in small communities.