



# Submission

**to the**

**Early Childhood Education and Care (Three Day Guarantee) Bill 2025**

**from the  
Federal Council**

**of the**

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

**February 2025**

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.

ICPA (Aust) values the opportunity to submit a response to Early Childhood Education and Care (Three Day Guarantee) Bill 2025.

In remote locations across Australia, early childhood education services are very limited, with often the only available option to access subsidised care being the In Home Care (IHC) program.

The lack of flexibility of the current A New Tax System (Family Assistance) Act 1999 (FA Act) – 85BA Eligibility for Child Care Subsidy (CCS) make the IHC program unsuitable for geographically isolated families and, in fact, accentuates the difficulties associated with accessing an equitable level of early childhood education and care in rural and remote areas. Many geographically isolated families cannot use the IHC program in its current form due to the inflexibility of the FA Act. In order for the three-day guarantee to be available to these families changes to the FA Act are needed to allow the IHC program to specifically meet the unique needs of geographically isolated families.

ICPA (Aust) seeks a separate geographically isolated IHC Program to cater for geographically isolated families' early childhood education and care (ECEC) needs as they are very unique and the FA Act lacks the required flexibility and specificity to allow families' access to the CCS they are eligible for.

In order to address this issue, ICPA (Aust) proposes the addition of specific wording such as '*except where care is being provided in a remote or very remote location*' in A New Tax System (Family Assistance) Act 1999. This could improve access to IHC for these families by providing a flexible approach that suits the reality of large remote farms and properties where more than one family live at the same homestead complex and board, lodging and other living expenses are often provided by the employer. For example:

- Allowing an educator to care for children from more than one family at the same time.
- Allowing an educator to care for their own child whilst caring for children from other families under IHC

The examples below outline typical situations of Australian rural and remote families needing this flexibility to create a practical childcare option.

Example 1: A single mother applies for a station hand position. She is highly qualified and prior to becoming a mother had extensive experience working on remote cattle stations. The owner of the station she has applied to also has a small child and already employs an educator through IHC. There is suitable accommodation for the mother and child but not enough for another educator. By allowing that educator to also care for the station hand's child, the station hand gets a job for which she is qualified (it is also difficult to find good station hands so expanding the pool of people who could take these jobs is important) and both children have access to good quality childcare as well as a playmate. One educator shared by both families is the only practical way to provide ECEC for these children and without a specific GI IHC program these families are excluded from accessing safe, quality care and education for their children.

Example 2: A father applies for a station hand position on a remote cattle station. He and his partner

have a toddler. There are no childcare facilities within 200km. The managers of the station also have a toddler. By allowing the partner to become the In Home Carer (dependent on meeting the relevant requirements) the manager's child has access to high quality care, the manager(s) can concentrate on their jobs, the station hand is not separated from his partner and his partner has a fulfilling job. Again, specific GI IHC Guidelines could cater well for this situation and provide a quality education for these children who might otherwise never experience a formal early childhood education.

Currently, the inflexibility of the FA Act excludes these rural and remote families from accessing CCS to employ an educator to care and educate their children. This adds substantially to their cost of living by adding the whole cost of educator wages or excludes one parent from workforce participation as per the examples above.

These remote and very remote children also have Distance Education as their only option for accessing compulsory primary school education. It is a legal requirement for these families to provide supervision of their children in their home schoolrooms, for which no financial support is available, adding to the financial burden these families face to provide their children with a quality and safe primary school education. ICPA (Aust) proposes this inequity could be rectified with specific flexibility in the FA Act for remote and very remote families to allow the use of CCS via the IHC program to help cover the cost of employing a tutor to supervise the geographically isolated distance education home schoolroom.

ICPA (Aust) requests the wording *'except where care is being provided in a remote or very remote location'* in A New Tax System (Family Assistance) Act 1999 – 85BA Eligibility for CCS and Child Care Subsidy Minister's Rule 2017 – Section 8.

#### A New Tax System (Family Assistance) Act 1999

##### *85BA Eligibility for CCS*

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

(c) (ii) is not provided as part of the compulsory education program in the state or territory where the care is provided *'except where care is being provided in a remote or very remote location'*

#### Child Care Subsidy Minister's Rule 2017

Section 8 - 1 (f) where during any part of the session, the child is attending school, or engages in a formal schooling program (including a home schooling or distance education program) *'except where care is being provided in a remote or very remote location'*

The introduction of A New Tax System (Family Assistance) Act 1999 states that IHC supports families' workforce participation and early childhood education and care requirements where other approved childcare services are not available or appropriate.

That is, the government supports families' participation in the workforce unless you live in a remote or very remote location and your child's only access to schooling is via government approved Distance Education. Then, the government expect rural and remote families to forgo any participation in the workforce and to supervise their child/ren's schooling for the entirety of their primary schooling years.

This is a government enforced roadblock to productivity across remote and very remote Australia and is yet another example of the failure of policy to assist families, community and productivity thrive in remote locations. Rural and remote agricultural communities that feed our nation will not flourish or grow without equitable assistance in educating these isolated children.