



Submission

to the

Draft In Home Care National Guidelines

**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. These families 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 this draft document that is relevant to the geographically isolated In Home Care (IHC) setting.

Geographically Isolated IHC

The lack of flexibility of the current A New Tax System (Family Assistance) Act 1999 – 85BA Eligibility for CCS and Child Care Subsidy Minister’s Rule 2017 and the In Home Care Guidelines make them unsuitable for geographically isolated families and, in fact, accentuates the difficulties associated with accessing an equitable level of early childhood education care in rural and remote areas. In remote locations, early childhood services are limited, with often, the only available option being the In Home Care (IHC) program. Many geographically isolated families cannot use the IHC program in its current form due to the inflexibility of the Legislation, Minister’s Rules and IHC Guidelines.

ICPA (Aust) seeks to separate the IHC Guidelines to suit the three cohorts that IHC attempts to cater for. Geographically isolated (GI) families’ early childhood education and care (ECEC) needs are so different to the other cohorts and while this document attempts to cover all three, it lacks the required flexibility and specificity to do that well for any of the cohorts.

In order to address these issues, ICPA (Aust) proposes that a standalone Geographically Isolated In Home Care program could improve access to and efficiency of 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 flexible and 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.

Family check inconsistency

Historically, each IHC Service has had a different system for keeping the family details up to date. Some families have been required to complete a large, detailed document every quarter to satisfy the Service that their circumstances haven't changed. Circumstances of these families living in a GI setting don't change very often and most are employed at least, on an annual basis. Providing quarterly or even six-monthly written updates of their circumstances is an onerous and unnecessary task. Currently the Draft Guidelines attempt to guide the Family check-in process timing to allow for some flexibility, but ICPA (Aust) would like to see more structure to create a consistent approach to confirming GI status. ICPA (Aust) seek that GI families re-submit paperwork on an annual basis while also meeting their obligation to notify their provider if their circumstances change.

Service fees

The obligations placed on Providers in conjunction with the lack of funding of those Providers has created a situation where they aren't viable businesses without charging fees to families to cover their business costs. This has created an inconsistent and unpredictable situation for families with no surety of the fees they'll be charged. ICPA (Aust) request that these guidelines create some certainty and limits around the fees that Providers can charge families.

Gap fees

Gap fees payment presents another scenario where these guidelines do not suit the geographically isolated setting. Compulsory digital payment of the gap fee does not practically account for provision of board, lodging and transport that is necessary in the GI setting. An educator on a remote property is provided with housing, food, electricity, internet and possibly transport by the family. Provision of these services adds to the cost for the family of accessing IHC and the inflexibility of the gap fee payment complicates the process of an educator contributing to these costs. For example, the family must digitally pay the gap fee and then, to recoup the costs for board, lodging, electricity and internet access, the family then needs to invoice the educator, who then processes a payment for those living costs.

Qualification exemption

ICPA (Aust) seek that the IHC Guidelines give IHC Providers direction to provide the support required to meet the qualification exemption in remote and very remote locations. This exemption is outside the philosophy of some IHC Providers and ICPA(Aust) believe the IHC Guidelines needs to create greater structure and surety around this exemption being offered to all eligible families. Families are not always aware of their eligibility so will rely on their IHC Service to offer that exemption.

Distance Education

For many years now ICPA (Aust) has been detailing to the federal Department of Education what GI families need to provide their children with a quality and safe education. Through other advocacy avenues ICPA (Aust) has requested the following 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.

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'*

A New Tax System (Family Assistance) Act 1999 in its introduction 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 you to forgo any participation in the workforce and to supervise you child's schooling for the entirety of their primary schooling years.

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