

Isolated Children's Parents' Association of Australia Inc.

"Access to Education"



Submission

to the

**Productivity Commission Review
of
Early Childhood Education and Care**

from the

Federal Council

of the

Isolated Children's Parents' Association of Australia Inc.

ICPA (Aust)

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The Isolated Children's Parents' Association of Australia, ICPA (Aust) welcomes the opportunity to provide comment to the Productivity Commission review of Early Childhood Education and Care 2023 with reference to children who, for geographic reasons do not have reasonable daily access to an appropriate educational institution.

This submission seeks to highlight how **inefficiencies** and the **lack of flexibility** in current Early Childhood Education and Care (ECEC) services available to rural and remote Australia lead to **affordability** and **accessibility** issues that produce **ineffective** programs creating **inequities** in the **educational and developmental** growth of children. In addition, the lack of **effective** service leads to **workforce constraints inhibiting economic growth** and **productivity** of rural and remote communities and industries.

ICPA (Aust) is a voluntary parent body dedicated to ensuring all geographically isolated students have **access to an equitable, affordable, high-quality education**. Access to quality early childhood education is essential for optimal educational and developmental outcomes for all children in Australia, **regardless of where they live**. ICPA (Aust) seeks equity of access to affordable early childhood education for Australia's most remote cohort of children, many of whom have no access to centre based early childhood education but rely on In Home Care (IHC) and/or mobile early learning services to meet their needs and rights to an appropriate early childhood education.

These geographically isolated children face a **unique disadvantage** in the pursuit of **quality education** which should be recognised and rectified to ensure they reach their potential in **school readiness**. It is estimated, using current State distance education preschool program numbers, there are approximately 250 Australian rural and remote students in the 3-4 year old age group who require access to quality, affordable educational services in the year before starting school, however, do not have any access to mainstream services. Using this estimate, there are at least 750 children in the 0-3 age group requiring quality, affordable early childhood learning and care that would allow them to thrive and allow their parents to participate in the workforce. This is a small number of children requiring specifically **unique government programs** to deliver them an **equitable start** to their education. Rural and remote children should be recognised as **educationally disadvantaged** and provided with **unique** programs to address this disadvantage.

Various Government programs have their own definition to determine if a child lives in an isolated situation but the detail in this submission refers to children in remote and very remote parts of Australia according to Accessibility/Remoteness Index of Australia (ARIA+)¹.

CHILDCARE and ECEC STAFFING IN RURAL and REMOTE AUSTRALIA

In Home Care

The **lack of flexibility** of the current In Home Care Guidelines and processes are inappropriate for geographically isolated families and in fact accentuate 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 IHC Guidelines.

¹ <https://able.adelaide.edu.au/housing-research/data-gateway/aria#methodology>

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 with respect to the required qualifications and suitability of rural and remote IHC educators.**
 - 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.
 - Extensions of time in which IHC educators must begin and complete a relevant qualification.
 - Allowing those qualified with a Certificate III in Early Childhood Education or equivalent but under age 18 to work within the IHC program.
- **Guidelines to regulate the fees that In Home Care providers can charge to families and educators who have to provide board and lodging for the IHC educator.**
 - In the recent years, fees that are being deducted from educator's fortnightly pays are increasing rapidly. In 2021, one IHC Service Provider increased their fees three times in a nine month period without any warning to the educator, making the gap fee payment for families greater through unregulated and unrestricted fees/charges by IHC service providers.

The June 2022 quarterly report² on usage of Child Care Subsidy shows there are 37 In Home Care service providers Australia wide servicing 1170 families and 2160 children delivering \$3,863,000 in childcare subsidy and \$5270,000 in additional childcare subsidy for a total of \$9,133,000. Due to the small numbers, to protect possible identification of client families, the data is not published showing inner regional, outer regional and remote and very remote as the centre based data is published. The children needing IHC services are small in number but face **substantial disadvantage** without a Geographically Isolated In Home Care program.

Several case studies are provided in **Appendix A** for your information, which demonstrate typical family/work scenarios in rural and remote Australia and how IHC guidelines don't serve their need.

Alignment of the ECEC Certificate III qualifications and In Home Care (IHC) Guidelines is required to support access to qualified educators within the IHC program. Currently, the IHC National Guidelines require carers to have, or be working toward, a minimum Certificate III level qualification in a relevant course. The guidelines detail further requirements including the carer being at least 18 years of age. Students can study a Certificate III in Early Childhood Education at school and be fully qualified and seeking employment in the early childhood sector upon their graduation from school at age 17. These young workers could be gainfully employed caring for rural and remote children under the IHC program, if Government regulation, namely the IHC Guidelines, allowed them to work in the industry for which they are qualified. The requirement of the IHC Guidelines for the carer to be 18 years of age is prohibitive to having qualified childcare workers in the program and disadvantages young, qualified people. While the qualification transitional provisions in place for remote and very remote locations are welcome and theoretically should assist with the employment of educators, in reality they have done **little to alleviate** the myriad of challenges associated with the In Home Care program as a whole.

²Quarterly report on usage, services, fees and subsidies June quarter 2022 report

<https://www.education.gov.au/child-care-package/resources/june-quarter-2022-data-tables>

National Working with Children Check (WWCC)

Early childhood education and care employees travel and work across rural and remote parts of the States and Territories of Australia and must apply for, fund and then wait for the processing of a different working with children check in each State/Territory. This results in lengthy delays causing disruptions and risks to the care of rural and remote children. ICPA (Aust) acknowledges that National Cabinet have a national workplan **to eliminate red tape and duplication** across different levels of government, including agreement to explore avenues to further improve and promote national consistency for WWCC. **Efficiencies** will be achieved if National Cabinet can continue to collaborate with States and Territories to develop, as a joint responsibility, options for national reforms to enhance child safety and reduce regulatory barriers around WWCC.

MOBILE EARLY LEARNING SERVICES

Unfortunately, in recent years, the availability of mobile early learning services for **disadvantaged, geographically** isolated children have severely dwindled due to **inadequate and uncertain** funding. Under current short term, rotating funding models which **abrogate security and longevity**, these early childhood services find it very difficult to retain staff due to the lack of security in the roles. This lack of security of funding and staffing makes these services **unsustainable**. Staff energy and time are expended in the **inefficiencies** of continually re-applying for funding, subsequently taking precious resources away from the children and families they're trying to help to learn, grow and thrive. Short term funding models do not work in rural and remote Australia. A model in which services are funded when they gain licence to operate and then report on their progress and achievements to maintain that licence and funding, would create a more **stable financial environment** for these businesses to operate under. As they gain a proven track record of delivering quality service, their licence agreement could be extended. Services without that track record can be on shorter licence agreements, providing a risk management exit strategy for the funder.

The Report into *Education in Remote and Complex Environments*³ recommended that the **Commonwealth modify funding arrangements for mobile early childhood education to provide flexibility and surety of funding for these services in the 2021 Budget**. Unfortunately, this did not occur, and the rights of these children to any adequate early childhood education has been diminished as a result. Long term continuity of funding for rural and remote mobile learning services would ensure their viability resulting in authentic outcomes for rural and remote children.

Diminishing funding of the mobile early learning model has reduced children's services to an unacceptable level, or removed them altogether, in some rural and remote communities. For your consideration a Case Study is provided in **Appendix A** outlining the experience from the perspective of a rural and remote community with no ECEC service which demonstrates how desperate these families are for any early childhood service for their children.

³The Report into *Education in Remote and Complex Environments*.

[https://www.aph.gov.au/About Parliament/House of Representatives/About the House News/Media Releases/Report tabled education in remote and complex environments](https://www.aph.gov.au/About%20Parliament/House%20of%20Representatives/About%20the%20House%20News/Media%20Releases/Report%20tabled%20education%20in%20remote%20and%20complex%20environments)

UNIQUE RURAL AND REMOTE ECEC PROGRAMS

Currently, not for profit services are providing our most geographically isolated families with the only ECEC service in their area. An example is Remote and Isolated Children's Exercise (RICE) in South

Australia who offer activity days, kindergarten programs, outback childcare in the home, play days, remote creche and their resource centre. Families have to pay fees for these programs and are not eligible for Child Care Subsidy (CCS) for these payments. This limited access to ECEC services for which they cannot claim CCS further disadvantages these families and children.

The plight of rural and remote families who have limited access to early childhood education and care continues to be a grave concern for ICPA (Aust) members across the country. An array of initiatives is required to address this reality to ensure that geographically isolated children are provided with equitable opportunities to access quality ECEC as their urban counterparts, lest where they reside result in considerable educational disadvantage.

INTERACTION WITH STATE PROGRAMS

Inequities in educational opportunities exist for rural and remote students because Federal funding does not integrate with State delivered programs **effectively** and **efficiently**.

Extension to the Assistance for Isolated Children (AIC) Distance Education Allowance for 3 to 4 year-olds undertaking a pre-compulsory distance education program.

All States and Territories offer early learning programs delivered by distance education for the year prior to the child starting compulsory schooling. For many geographically isolated families, this is the only avenue available to access an early childhood education. Children undertaking these **pre-compulsory distance education** programs are effectively blocked from any funding to assist with meeting the costs of program delivery, setting up their schoolroom and accessing school functions.

The cost of establishing a home schoolroom is significant and includes purchasing learning resources, stationery, furniture and much more. It is also vital that young children have opportunities to socialise face-to-face with other children of their age. This often requires families to travel great distances and pay for accommodation, all at their own expense, to attend school functions at the School of Distance Education/School of the Air centre which provide an opportunity for their children to participate in group activities, such as sport, practising conversation skills and interacting with their peers. These functions are also valuable in providing teachers and other professionals with both group and individual evaluation and diagnostic opportunities.

These children are deemed ineligible for the **Assistance for Isolated Children (AIC) Distance Education Allowance** as they are not recognised by the Australian Government as participating in compulsory schooling and no payment is available through the Child Care Subsidy (CCS) either as these children are still in their parents' care while participating in distance education.

State Education Departments have created and are implementing appropriate preschool/kindergarten programs for geographically isolated children using funding through the Preschool Reform Agreement 2022-2025, formerly known as the Universal Access National Partnership, so these children are starting their distance education journey in the year before compulsory schooling starts. They are not however recognised by the Federal Department of Education as needing the Assistance for Isolated Children Distance Education access allowance during this year.

Families qualify for the AIC Distance Education Allowance as geographically isolated according to these

criteria:

- Your family home is 56 km or more from the nearest suitable government school.
- Your family home is more than 16 km but less than 56 km from the nearest suitable government school and you meet one of the following:
 - at least 4.5 km away from the nearest transport to school.
 - your child has no transport to get to the school.
- Your child can't get to the nearest suitable government school for at least 20 days a school year due to circumstances beyond your control. For example, adverse weather conditions.

ICPA (Aust) therefore urges the Federal Government to extend the AIC Distance Education Allowance to these students. The need for this initiative to be implemented was also recommended in the Report on *Education in Remote and Complex Environment*³ however no further action was taken thereafter.

ECONOMIC GROWTH and WORKFORCE PARTICIPATION

The lack of a specific rural and remote vision to deliver Early Childhood Education and Care (ECEC) services to geographically isolated families significantly hinder the **educational development** of children living in these areas, and also **stifles the growth and sustainability of communities** and industries to which these families belong. With limited to no access to suitable ECEC services in many rural and remote communities and surrounding areas of Australia, **women** especially are unable to **participate** in the workforce, inhibiting their **capacity for growth, independence** and the ability to gain their living by work. A strategy for and delivery of quality ECEC, specifically for rural and remote areas should be the backbone of **equitable educational outcomes** for geographically isolated children and would strengthen the **economic and social vitality** of families and communities across rural and remote Australia.

Compulsory Education Supervision

In 85% of instances, the mother of the children must act as the Home Tutor in the geographically isolated distance education classroom. She is therefore taken out of the workforce, foregoes an income and relevant financial benefits and performs a role out of necessity for many years of her life so her children can access compulsory education. This issue goes to the heart of **equitable** access to education, which is every child's right, and speaks to the **value and support for women's equality** in the remotest parts of Australia along with the sustainability of rural and remote communities and the vital industries they facilitate and support.

³The Report into *Education in Remote and Complex Environments*.

[https://www.aph.gov.au/About Parliament/House of Representatives/About the House News/Media Releases/Report tabled education in remote and complex environments](https://www.aph.gov.au/About_Parliament/House_of_Representatives/About_the_House_News/Media_Releases/Report_tabled_education_in_remote_and_complex_environments)

RURAL AND REMOTE CHILDREN'S VULNERABILITY DUE TO DISADVANTAGE

In conclusion, ICPA (Aust) seeks to highlight and rectify the **inequity and disadvantage** in the current child care system which does not provide for the human rights and freedoms of rural and remote children and families recognised in the international instruments listed in section 3 of the *Human Rights (Parliamentary Scrutiny) Act 2011*.

"that children of working parents have the right to benefit from child care services and facilities" and "the right of everyone to the opportunity to gain their living by work" (p. 7-8).

The ICPA (Aust) Early Childhood Education and Care Portfolio Briefing Paper provides a comprehensive explanation of early childhood education and care issues faced by geographically isolated families in Australia.

APPENDIX A

Typical situations of Australian rural and remote families needing a 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.

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 obtaining the relevant qualifications etc) 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.

Example 3:

A current Year 10 student commenced a Cert III in Early Childhood Education and Care and will be working within a school-based traineeship in a kindergarten setting for the duration of her studies. She was able to commence the Cert III in Year 10 at high school as she had clear career aspirations to work within a rural setting as an in-home educator or carer. This student will not be 18 years old for approximately six months after the completion of Year 12, thus meaning she will be ineligible to obtain an IHC position and be disadvantaged in pursuing her career for this period of time.

Case study of rural and remote community with no ECEC service:

The Cunnamulla State School (QLD) has the funding for an early childhood teacher 2 days per week through the Keeping Early Years in the Spotlight Program (KEYS) however they have been unable to fill the position.

The Cunnamulla library has recommenced in late May 2022 a one hour per week session of singing and story time as part of 'The First Five Forever Program' (Children must be vaccinated to attend.)

- 2021 data indicates 47% of children start school in the Cunnamulla district developmentally vulnerable.
- The Early Childhood Education and Care Department have been active in Cunnamulla since July last year and no significant action or change has occurred.

- Results from the Australian Early Developmental Census have deteriorated since 2009 and Cunnamulla is one of 5 locations which are going backwards.
- Paroo Shire has been nominated as a QLD State early childhood priority.
- The Paroo Contact Children's Mobile remains unfunded, Contact Inc (who own the equipment & did operate the service) have made no contact with Cunnamulla, the equipment, including fully equipped Toyota Landcruiser 4WD with canopy, all sit in Cunnamulla unused as there is no funding for the coordinator/teacher.
- The Paroo Contact Children's Mobile needs to get funding to immediately recruit staff to utilise the vehicle and extensive early childhood resources/equipment to offer regular scheduled supported playgroups to Eulo, Cunnamulla, Noorama, Quilpie and Thargomindah.

The Noorama Playgroup has been running for almost a year with on average 5 parents and 8 children in attendance, with a total membership of 10 core families and 20 children. The playgroup meets monthly and is run by volunteer parents, most with minimal experience with early childhood education.

The main issues this playgroup hopes to address include:

- Improving statistics on disadvantaged school starters by better preparing our children in the early years.
- Access to qualified educators that can help parents learn how to interact with their children at home and identify developmental abnormalities. If required, they could assist with pathways to support services.
- Ensure funding and services are reaching remote children.
- Provide a socialisation opportunity for both children and parents.
- Prepare families and facilities/services for Distance Education, which will be required in the near future.