

Isolated Children's Parents' Association of Australia Inc.

"Access to Education"



Submission

to the

The Early Years Strategy Discussion Paper

from the

Federal Council

of the

Isolated Children's Parents' Association of Australia Inc.

ICPA (Aust)

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Contact:

Kim Hughes
Federal Secretary
ICPA (Aust)
Harrogate Station
RICHMOND QLD 4822
FedSecretary@icpa.com.au
Tel: 0427 377 985

Contact:

Alana Moller
Federal President
ICPA (Aust)
Star of Hope
CLERMONT QLD 4721
FedPresident@icpa.com.au
Tel: 07 4983 5353

The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to provide comment on The Early Years Strategy Discussion Paper.

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.

Every child deserves the opportunity for the best start to life to achieve their goals and dreams.

(The Early Years Strategy Discussion Paper Feb 2023, Foreword (Ministers))

Access to quality early childhood education is essential for optimal educational and developmental outcomes for all children in Australia, **regardless of where they live**. The lack of a specific rural and remote vision to deliver Early Childhood Education and Care (ECEC) services to geographically isolated families significantly hinders 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 make a meaningful contribution to their community. 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.

Question 1. Do you have any comments on the proposed structure of the Strategy?

Central to ICPA (Aust)'s vision for rural and remote ECEC is **authentic, lifelong** outcomes for **geographically isolated** children and families and the belief that this Strategy must break down current barriers so resources are applied in the targeted action plans where they will achieve **child centred outcomes**. Furthermore, the Implementation Action Plan of the Strategy requires a feedback loop or cyclical structure to ensure that feedback is actually used to inform change and improvement going forward. For this Strategy to be successful on the ground it needs to be financially effective, so funding actually reaches the children in need and is not evaporated into bureaucracy. The focus must be on continuous improvement of the services helping children to learn, develop and thrive.

Question 2. What vision should our nation have for Australia's youngest children?

Every Australian child will be delivered the required support services to learn, develop and thrive wherever they live.

Question 3. What mix of outcomes are the most important to include in the Strategy?

ICPA (Aust) believes outcomes of priority must fill the gaps in the current systems for rural and remote children, some of whom have little to no access to professional early childhood education before starting compulsory schooling.

1. Eliminate disadvantage by providing access to quality ECEC to rural and remote children.

The lack of essential ECEC services available to geographically isolated children continues to fail the country's most remote cohort, many of whom have no access to centre-based early childhood education and rely on In Home Care (IHC) and/or mobile early learning services. The complexity of

need of rural and remote families and children, specific to their location and circumstances begs an obvious need for a **separate rural and remote category of disadvantage**.

Currently, not-for-profit services are providing our most geographically isolated families with the only ECEC service in their area. Families are required to pay fees for these programs and are not eligible for Child Care Subsidy (CCS) for these costs. This limited access to ECEC services for which they cannot claim CCS further disadvantages these families and children.

In remote locations, early childhood services are limited, and the In Home Care (IHC) program is often the only available option. However, many geographically isolated families cannot use the IHC program in its current form for various reasons, primarily due to the current guidelines and processes associated with the IHC program. These guidelines are inappropriate for geographically isolated families and in fact accentuate the difficulties associated with accessing an equitable level of early childhood education in rural and remote areas.

Diminishing funding of the mobile learning service model has further reduced children's services to an unacceptable level, and in some rural and remote communities, has removed it altogether. Unfortunately, in recent years, the availability of these services for disadvantaged, geographically isolated children has severely dwindled due to inadequate and uncertain funding under current funding models which abrogates security and longevity for early childhood services.

The Report into *Education in Remote and Complex Environments* 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 access any early childhood education has been diminished as a result.

Children undertaking **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. 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. 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 Environments* however no further action was taken thereafter.

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).

Mothers especially, who live on geographically isolated properties in Australia are not given the opportunity to gain their living by work because they have no options for affordable, adequate childcare.

2. Optimal health and development of all children no matter where they live.

To achieve optimal health and developmental outcomes, focus must be on parental health from before conception, followed by a strong emphasis on family health to maintain support structures around new parents which enable and empower parenting from a positive and confident sense of

wellbeing. Synergy between rural and remote health services and rural and remote ECEC services for children from birth to school age is a critical gap currently causing significant disadvantage to our geographically isolated children and families in Australia.

Question 4. What specific areas/policy priorities should be included in the Strategy and why?

1. A specific rural and remote ECEC policy.

Students who live hundreds of kilometres from ECEC services deserve recognition as existing under a unique suite of disadvantages that are not met by current policies.

2. Professional ECEC staffing system

Optimal outcomes will only be realised when ECEC staff are valued by our country and given the professional status commensurate with the role they are playing in the lives of our future generations. Availability, attraction and retention of quality ECEC staff must be a vital piece of this Strategy. This will not eventuate until the issue of pay package parity between ECEC services and schools is addressed. When an Early Childhood Teacher completes a four-year degree, if they elect to work in the public school system in a rural and remote location, the additional benefits they are eligible for compared to working as an Early Childhood Teacher at a long day care centre include:

- Additional 7 weeks of annual leave
- Significantly shorter contact hours per week
- Professional mentoring by other teachers
- Structured Professional Development programs
- Access to teacher housing

Early Childhood services are significantly limited in their budgets. It is important to find long term solutions to address pay package parity for Early Childhood Teachers in rural and remote locations.

3. 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.

Question 5. What could the Commonwealth do to improve outcomes for children – particularly those who are born or raised in more vulnerable and/or disadvantaged circumstances?

1. Assistance for Isolated Children (AIC) – Distance Education (DE) Allowance for approved Distance Education ECEC participants.

ICPA (Aust) greatly values the AIC and the assistance it provides for rural and remote families educating their school aged children. For many years, members have called for this assistance to be

extended to geographically isolated children enrolled in an approved early childhood distance education program to ensure they have the opportunity to access their 600 hours per year as per the *Preschool Reform Agreement 2022-2025*. Assistance for Isolated Children for 3 and 4 year-olds would provide the support necessary to set up remote home classrooms and resources to facilitate distance education pre-school play, learning and lessons. This was recommended in the 2021 Report on *Education in Remote and Complex Environments*, however has not yet been implemented.

All States and Territories offer early learning programs delivered by distance education. For many geographically isolated families, this is the only avenue available to access an early childhood education. Families undertaking these 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.

Recommendations:

The extension of the AIC Distance Education Allowance to 3-4-year-olds undertaking an approved pre-compulsory distance education program in order to:

- create more affordable access to early childhood programs the year before rural and remote children start school
- provide an opportunity to meet the Preschool Reform Agreement 2022-2025
- give educators the opportunity to deliver early intervention where needed.

2. Access to the Child Care Subsidy (CCS) for unique rural and remote ECEC programs

In some parts of rural and remote Australia there are short term ECEC services that are the only ECEC service within these communities other than In Home Care (IHC). They do not attract CCS so families using these services pay full fees to give their children an opportunity to access the only short term ECEC service in their area. To be viable, these services rely completely on community donations or families paying unsubsidised hourly fees as they do not attract Government funding. In situations where IHC is not practical or possible, families are disadvantaged by having to pay for their children to have access to a short term ECEC service.

ICPA (Aust) believes that if the criteria for eligibility for the CCS included consideration of the unique needs of these rural and remote families, these services would become more affordable and therefore accessible for families. Please see the below Case Study (Appendix A) for an example from South Australia.

3. A rural and remote In Home Education program to allow children to learn, develop and thrive, parents to work, grow and thrive and thus rural and remote communities to thrive, socially and economically.

- **A flexible approach with respect to the required qualifications and suitability of rural and remote IHC educators including:**
 - 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.
- **Introduction of guidelines to regulate the fees that In Home Care providers can charge to families and educators.**
 - IHC Service providers are burdened with all the compliance obligations of meeting legislative requirements for the CCS with little to no guidance in how to implement that compliance. As a result, there are many and varied methods with mixed results and differing fees attached. These fees are passed onto families or educators and have increased several times in recent years. Providers need to be regulated to provide professional service for reasonable fees or a uniquely rural and remote IHC program could be delivered differently without the need for Service Providers.

4. Long term continuity of funding for rural and remote mobile learning services.

This would ensure their viability resulting in authentic outcomes for rural and remote children. Services funded on rotating short term funding models find it very difficult to retain staff due to the lack of security in the roles. Staff energy and time are expended in re-applying for funding, subsequently taking precious resources away from the precious people they're trying to help to learn, grow and thrive. Short term funding models do not work in rural and remote Australia. As mentioned above in highlighting the disadvantage rural and remote children face in gaining a quality education in Australia, The Report on *Education in Remote and Complex Environments* 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.

5. Specifically rural and remote staff incentive programs

Rural and remote employment incentive programs could significantly reduce childcare service waitlists which are largely caused by a lack of ECEC staff. In turn, this lack of childcare availability limits the possibility of attracting professionals (e.g. Doctors) to the area which further disadvantages the community's children.

If a childcare centre is not meeting the qualified educator ratio, the service is unable to operate. Services are in breach of legislation and the approved provider is liable for a \$50000 fine, in which case, service closures can occur, thereby often taking away the only opportunity for rural and remote children to participate in vital preschool programs.

Incentive programs are necessary to engage qualified staff in rural and remote ECEC services and ICPA (Aust) implores The Early Years Strategy to bring together all relevant departments to forge a pathway in creating innovative and relevant training and employment incentive packages to place and retain staff in the rural and remote early childhood centres and programs.

Increased financial assistance coupled with incentive programs for skilled employees for rural and remote services would allow approved providers to attract and retain qualified early childhood educators and teachers. Services will then have the capacity to support children to meet necessary early childhood outcomes. The risk if this is not achieved is that children will continue to be at a disadvantage to other children through compromised delivery of early childhood education and care.

Question 6. What areas do you think the Commonwealth could focus on to improve coordination and collaboration in developing policies for children and families?

The breaking down of barriers between Federal funding and State programs, thereby creating innovative communication and collaboration with children and families foremost in all minds. Further, it is imperative that the Federal Government heed recommendations made in inquiries such as the *Inquiry into Education in Remote and Complex Environments* which have not yet been addressed.

Question 7. What principles should be included in the Strategy?

The principle of **child centred care** should be included in this Strategy, which can be achieved by the application of sufficient funding, structures, programs and collaboration, resulting in children learning, growing and thriving. The Strategy also must acknowledge that needs vary across the country and blanket principles and policies will not work for every different cohort of children.

Question 8. Are there gaps in existing frameworks or other research or evidence that need to be considered for the development of the Strategy?

The Report on [Education in Remote and Complex Environments](#) made recommendations that have not yet been implemented but are still required, to avoid disadvantage for rural and remote children. These include:

- **Assistance for Isolated Children (AIC) – Distance Education (DE) Allowance for approved Distance Education ECEC participants.**
- **Flexibility and surety of funding arrangements for mobile early childhood education.**

[Childcare Deserts and Oasis: How accessible is Childcare in Australia?](#) by The Mitchell Institute must be used to inform targeted action plans if this Strategy is to be **child and need focused**.

Recent and upcoming changes to the Child Care Subsidy do not address the provision of an equitable, accessible, and affordable service for the unique circumstances of geographically isolated families. The Early Years Strategy needs to seriously consider the unique geographical barriers which hinder access to affordable high quality ECEC.

An array of initiatives is required 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.

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.