



ICPA (Aust)

Isolated Children's Parents' Association Inc

Early Childhood Education & Care Portfolio

2022-23

Briefing Paper



-Access to Education for rural and remote students -



EARLY CHILDHOOD EDUCATION AND CARE

The Isolated Children’s Parents’ Association of Australia, ICPA (Aust), is a voluntary, apolitical, national parent organisation working on behalf of our members for equity of access to appropriate education for children living outside of metropolitan areas.

Accessing affordable early childhood education and care for families living in rural and remote regions has never been more concerning and is proving beyond the reach of many due to:

- lack of available services
- difficulty attracting and retaining staff
- inflexibility of service delivery programs
- high out-of-pocket costs
- uncertainty and inadequacy of funding for Mobile Early Childhood Services.

SUMMARY

Rural and remote early childhood education and care issues fall into three broad categories.

1. Universal Access to Early Childhood Education

The Commonwealth Government is committed to Preschool Reform Agreement 2022-2025.

- Affordability of and access to an early childhood education continues to impede the participation of some rural and remote children.
- The extension of Assistance for Isolated Children (AIC) Distance Education Allowance to include three and four-year-olds would improve access and affordability.
- Flexibility in the use of school buildings and flexibility in the qualifications of staff would expand the number of accessible early childhood education programs.

2. Mobile Early Learning

Mobile Early Learning Services can be the ONLY early childhood service accessible to some rural and remote families.

- Funding of Rural and remote Mobile Early Learning decreased under funding restructures and continues to be uncertain.
- No provisions for the establishment of new mobile early learning services are evident.
- Some rural and remote families have NO access to an early childhood service.

3. Child Care

A myriad of issues affects families educating and caring for their children in these areas. ICPA members continue to raise concerns about the inappropriateness of current delivery models for geographically isolated families and difficulties associated with accessing early childhood education and care in rural and remote areas.

- The Commonwealth Government’s In Home Care (IHC) program is part of the child care package and provides flexible care that supports families' workforce participation and child care requirements where other options are not available or appropriate.
 - IHC can be the ONLY child care option for many rural and remote families.
 - IHC program guidelines are inflexible and consistently disadvantage rural and remote families. Distance education school rooms require a supervisor. IHC guidelines specifically preclude receipt of the Child Care Subsidy for supervision of distance education.
 - Workforce participation of rural and remote families with children on distance education is not

supported by the IHC program.

- Changes to criteria of Working Holiday Maker and Temporary Work (Skilled) Visas could help alleviate workforce shortages.
- A National Working with Children Check would improve the ease of transitioning child care and education staff between States/Territories.

ISSUE 1

UNIVERSAL ACCESS TO EARLY CHILDHOOD EDUCATION

The Federal Government is committed to the Preschool Reform Agreement 2022 – 2025 and recognises that early learning is vitally important however, accessibility and affordability is a barrier for some geographically isolated families for whom distance education is the only option. ICPA (Aust) seeks continuation of the Preschool Reform Agreement funding of \$1.6 billion over four years from 2021–22 to be delivered to the states and territories through a new four-year funding agreement, with ongoing funding of \$589.0 million per year (indexed) from 2025–26.

A myriad of issues affects families educating and caring for their children in these areas. ICPA members continue to raise concerns about the inappropriateness of current delivery models for geographically isolated families and difficulties associated with accessing child care and education in rural and remote areas. Specialised model/s need to be established for rural and remote families; programs designed to address the unique disadvantages and needs associated with caring for and educating children in geographically isolated locations.

RECOMMENDATION

- **The establishment of a stand-alone ‘Rural and Remote Early Childhood Section/Branch within the Department of Education, encompassing all early childhood education and care such as preschools and kindergartens, mobile early learning services, Long Day Care and In Home Care to provide for the unique needs of rural and remote families.**

The extension of Assistance for Isolated Children (AIC) Distance Education Allowance to include three and four-year-olds would improve access and affordability.

Three to four-year-old students enrolled in an approved pre-compulsory distance education program need to be supported while participating in their essential transition to formal schooling programs. The Assistance for Isolated Children (AIC) Distance Education Allowance should be extended to include these children as no other financial assistance is available for this cohort.

The Australian Government recognises the importance of ensuring that children are not disadvantaged in terms of their early physical, social and educational development. Researchers throughout the world report that the social and developmental gap in children’s functioning and achievement can be significant by age six. These differences in the cognitive, non-cognitive and social skills are strong predictors of later academic, occupational and life achievement.

The delivery and accessibility of early learning programs for children in the year prior to starting formal schooling has never been better. This can be attributed to the Federal Government’s commitment to the Universal Access to Early Childhood Education Program. Despite this, ICPA (Aust) remains concerned about the affordability of accessing programs for those living in rural and remote regions.

ICPA (Aust) believes the impact of not being able to access affordable early learning for children living beyond the metropolitan boundaries is evident in the gap between educational outcomes for rural and remote students when compared to those living in large centres. Much of this is due to learning difficulties which are undiagnosed in the early years and having very limited opportunities to socialise and interact with other

children.

All States and Territories offer early learning programs delivered by distance education and this is the *only* avenue available for many families living in rural and remote areas. Families wanting to access these programs are bearing the entire cost associated with administering, resourcing and teaching the lessons. Across Australia, around 200 children access recognised 3-4-year-old programs in their homes through distance education, which today includes a mixture of hands-on play-based learning and teacher-led structured lessons which involve the use of technology for communication. As with every other early childhood program for three to four-year-olds, these distance education lessons are designed to help children transition from home to school. The children need a designated learning space in which to learn school behaviours, such as the ability to sit at a desk for enough time to complete a task, to use the technology required for distance education, to appropriately interact with their peers and teacher and to understand the formal concept of school.

It is 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 to attend school functions which provide an opportunity for the children to participate in group activities, such as sport, practise conversation skills and socialise with their peers. These functions are also valuable in providing teachers and other professionals with both group and individual evaluation and diagnostic opportunities.

Families undertaking approved 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 students are deemed ineligible for the Assistance for Isolated Children, (AIC), Distance Education Allowance as 3-4-year olds taking part in these early learning programs are not recognised by the Australian Government and no payment is available through the Child Care Subsidy (CCS) as these children are still in their parents' care.

RECOMMENDATION

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

More facilities for preschool education in rural and remote communities.

The flexibility of use of school buildings in small rural towns to include preschoolers, more preschool distance education places and more facilitators are required to ensure that all students have access to the required 15 hours per week preschool education. Facilitators should include qualified primary school teachers and diploma qualified educators where Early Childhood teachers are difficult to access. Students commencing formal schooling need to be school-ready, especially as Early Learning Languages Australia (ELLA) and Science, Technology, Engineering and Maths (STEM) subjects in the form of Early Learning STEM Australia (ELSA) have also been introduced to the preschool curriculum. Rural and remote students will lag behind their urban peers from the very beginning if preschool has not been experienced in their early years.

RECOMMENDATION

- **Dispensations be made to improve access to preschool facilitators and school facilities in rural and remote areas.**

ISSUE 2

MOBILE EARLY CHILDHOOD SERVICES IN RURAL AND REMOTE AREAS

For many years, various mobile children's services have delivered the important services of being able to provide social contact, professional advice, mobile early learning services and early childhood programs. They play a vital role in offering developmental opportunities for children and interactions with parents in small

rural communities and outlying, often very isolated, areas. In many cases, these services provide the only face-to-face interaction for children of similar ages. Flexibility and certainty of funding for these services is vital in providing the much needed socialisation component of early childhood programs for these communities. Adequate funding needs to continue for mobile early learning services and early education programs for rural and remote children as well as funds and support for the creation of new services in geographically isolated areas where early childhood services do not exist. The following issues need to be addressed:

- Mobile early learning services no longer funded under Budget Based Funding (BBF) were transitioned to Indigenous Advancement Strategy funding or to new Child Care system funding. Neither model sufficiently caters for the unique services provided by mobile early learning services to rural and remote families, especially those services which do not include child care.
- No provision appears to be available for the establishment of new mobile early learning services.
- Funding continues to be inadequate and uncertain.

RECOMMENDATION

- **Mobile early learning services in rural and remote areas, be supported with adequate and secure funding.**

ISSUE 3

CHILD CARE

In Home Care (IHC)

Families living in rural and remote Australia, who are able to provide accommodation, previously found the IHC program to be an affordable option when it came to accessing child care. However presently In Home Care is not meeting the needs of families, with the following four main concerns continually raised by our members:

- That the IHC program needs to remain accessible for all rural and remote families who have no other child care options.
- IHC educators should be allowed to supervise distance education where face-to-face schooling is not available as teachers are not present to look after the children.
- The difficulty of finding suitably qualified people to employ in their homes to provide child care or to teach the children of rural and remote families who must be educated by distance education.
- Fees charged by IHC providers are rising and changing often without explanation.
- The limitations of the IHC National Guidelines which require educators to be at least 18 years of age, despite either working towards a minimum Certificate III level qualification or already obtaining the qualification. This limits the opportunity for young workers to be gainfully employed following graduation.

RECOMMENDATIONS

- **That an In Home Care (IHC) program, or sub-program thereof, be established specifically for rural and remote families.**
- **That amendments be made to IHC Guidelines to cater for the needs of rural and remote families.**
- **That Child Care Subsidy decisions make specific dispensation or consideration of IHC circumstances.**
- **That a specific IHC program be established for rural and remote families who have to provide board and lodging for their educators to reduce families' gap payments for IHC.**
- **That a flexible approach be taken with respect to the required qualifications for rural and remote teachers/educators.**
- **That IHC educators be allowed to supervise distance education where face-to-face schooling is not available as teachers are not present to look after the children in distance education schoolrooms.**

- **A review of and structure provided around the fees charged to families and educators by IHC providers.**
- **The amendment of the IHC National Guidelines to allow graduates with a Certificate in Early Childhood Education, or equivalent, who are less than the age of 18 years to be eligible for positions of employment through the IHC program.**

Short term child care services

There are short term child care services available to some rural and remote families who cannot afford to them as they do not attract the Child Care Subsidy through Services Australia.

Case Study: In South Australia, the Remote and Isolated Children’s Exercise (RICE) provide an Outback Childcare program that enables families to receive short-term child care in the family home when they are in need of child care during busy times or if they need respite or emergency care. Currently this program does not attract any Government support or funding, resulting in RICE having to rely on community donations or asking families to pay an unsubsidised, full rate hourly fee for the service. The Child Care Scheme (CCS) can only be received when a child is enrolled through a centre-based child care facility or through the In Home Care (IHC) program which is currently unavailable for RICE member families due to provider limitations within South Australia. The cost to access child care without the CCS is an unaffordable option, leaving families to try find other ways to manage child care needs. Families living in rural and remote areas have no real option of child care like community creches, nearby centres or family or friends who could step in. Living on a remote cattle station 1000km from Adelaide makes asking your mum, sister or best friend to step in and help for the day unpractical and often impossible. With the recent report that indicated the Federal Electorate of Grey (which encompasses 90% of South Australia, including all of its rural and remote areas) has the worst access to child care in the country, just finding a facility, let alone accessing it, is a difficult undertaking in itself. The Outback Childcare service needs to be made affordable for families as well as being viable for RICE to manage and administer.

If the criteria for eligibility for the CCS was to consider the needs of rural and remote families, therefore allowing them to access child care through the IHC program, then the RICE based Outback Childcare and similar services would become more affordable and accessible for families in times of need.

RECOMMENDATION

- **Consideration of the uniqueness of child care needs and child care services in rural and remote communities with regard to these families accessing the Child Care Subsidy.**

Working with Children Check

The process of obtaining the Working with Children Check (WWCC) in each State or Territory is expensive, slow and impedes early childhood workers, tutors and teachers who wish to help various families interstate. A national WWCC certification would help resolve this and was recommended in the Royal Commission into Child Abuse Final Report^{3F1}.

ICPA (Aust) supports all the Governments’ efforts to progress a national WWCC certification soon to efficiently fulfil the staffing needs of rural and remote families.

RECOMMENDATION

- **That a National Working with Children Check (WWCC) certification be established as a matter of priority to ensure early childhood carers, teachers, educators and those assisting with education particularly in rural and remote areas can transition across States/Territories more smoothly.**

Working Holiday Maker Program: Working Holiday Maker Visas and the Shortage of Distance Education Tutors and Nannies in Rural and Remote Australia

Due to geographical isolation, there is a distinct lack of Australian workers, including qualified child care and educational workers, who are willing to undertake work where remoteness is an issue. It is extremely difficult to attract and retain Australian child carers, home tutors (distance education tutors) and teachers to rural and remote areas. Frequently, the only people prepared to travel and work in remote areas are overseas travellers looking for a cultural exchange experience and our rural and remote members rely on the employment of overseas workers to fill these positions. While these workers are a valuable resource, under the conditions of their visas they are not eligible for a second- year visa if they undertake employment in the area of child care in rural and remote areas. Plant and animal cultivation, fishing and pearling, tree farming and felling, mining and construction are currently the specific fields of work that qualify an applicant for a second-year visa. Measures including extending the eligibility for a second-year visa to include child care and education provision under rural work are incentives for backpackers to holiday and work in rural and remote Australia.

The Second Year Working Holiday visas 4170F2 and 4621F3, are not available for distance education tutors/teachers or nannies from overseas in rural and remote areas, despite being rural work. However, with recent developments in regional areas of Australia, second-year visa applicants could be accepted there, on the 462 Working Holiday visa, if having worked for six months in agriculture, tourism or hospitality the previous year. Also, in regional areas of Australia, if working for six months for one employer on a Working Holiday Maker visa 417, permission can now be granted to stay another six months with that employer. If child care or distance education supervision were eligible as Specified Work, this would help provide workplaces for distance education tutors in other rural and remote areas if the same conditions apply as for other second-year visa seekers. In the distance education schoolroom, 12 months' support would be more beneficial than just six months to support the importance of continuity and consistency.

At times, overseas couples wish to work on a rural or remote property; both would enjoy the cultural experience and one partner is able to work with the livestock, orchards etc., however the other partner may wish for a less physical type of work. She is unable to work in the distance education schoolroom or assist with child care on the property to gain eligibility for a second-year visa as this is not on the 'Specified Work' list.

Making the second-year visa accessible to nannies and distance education tutors under agriculture would provide a better solution for rural families seeking to employ staff and a better experience for overseas workers who wish to remain with one employer.

¹ https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_recommendations.pdf

² <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/work-holiday-417/specified-work>

³ <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/work-holiday-462/specified-462-work>

Volunteer Work Activities

The removal of eligibility of volunteer work activities in application for a Second Year Working Holiday visa as of 1 December 2015, compounded the issue of shortage of work support in rural and remote areas. Families find it harder to find willing workers to assist in running the farm and managing their children's distance education. Many visitors to Australia appreciate 'real life experiences' on farm and are willing to volunteer their time in return for meals and accommodation e.g. 'WWOOF' program (Willing Workers on Organic Farms). If volunteer hours were once again reinstated as eligible for a Second-Year Visa, rural Australia's employment pool would expand relieving pressure on its families.

RECOMMENDATION

- **The reinstatement of volunteer hours as an eligible activity for a Second-Year Visa.**

Temporary Work (Skilled) Visa (subclass 457)

This visa was replaced with the new Temporary Skill Shortage (TSS) (subclass 482) Visa in March 2018 which

supports businesses in addressing genuine skill shortages, particularly in rural and remote areas. Visa applicants are now required to be sponsored by a business up to two or four years as per their specified skill. Skilled Early Childhood teachers, Primary and Middle School teachers, Private Tutors, Regional Education Managers and Child Care Centre managers are all on the approved occupation list. There is a real shortage of people willing to fulfil Distance Education supervisor/tutoring roles. If qualified teachers were happy to work with Distance Education students in remote classrooms, it would be an excellent option, however more often it is a skilled worker such as a nanny or governess who is willing to accept Distant Education opportunities. It would be extremely beneficial if nannies and governesses could be added to the TSS Occupations List and private tutors and teachers could then be approved for distance education classrooms.

RECOMMENDATION

- **That teachers, Distance Education tutors and nannies be added to the current 'Specified Work' list For Working Holiday Visas so they can assist with child care and education for rural and remote families.**

Staffing and employment incentives and pay package parity

For many years Education Departments have been aware of the need to provide pay and incentives to attract and keep teaching staff in rural and remote locations. We now need the same attention paid to attracting and retaining staff in the Early Childhood sector. In very remote areas, access to housing or subsidised housing can mean the difference between having an operational centre or not. Rural and remote areas need assistance to attract educators because our children deserve a 'good start' too.

We are losing university trained early childhood educators to the school system where the pay and conditions far outweigh that of long day care centres, yet we know how important those early years are. These educators are with our children during their years of greatest development, yet we are not prepared to pay or reward them accordingly. Pay parity of Early Childhood Teachers is a significant issue. An Early Childhood Teacher completes a four year degree course. If they elect to work in the public school system in a rural and remote location, the additional benefits they would get compared to working as an Early Childhood Teacher would include:

- Additional 7 weeks of annual leave (approx. \$10,000pa)
- Significantly shorter contact hours per week
- Approx. \$20,000-\$30,000 additional salary
- Professional mentoring by other teachers
- Structured Professional Development programs (\$10,000 pa)
- Access to teacher housing (at a 70% discount on market rates in Bourke) (\$10,000 pa).

Early Childhood services are significantly limited in their budgets.

RECOMMENDATIONS

- **Incentives and structures which allow Early Childhood educators to work in rural and remote areas without disadvantage in comparison to their urban colleagues.**
- **That pay package parity of Early Childhood Teachers in rural and remote locations across all Early Childhood Education settings be addressed.**

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)

April 2023

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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.