



YWCA
CANBERRA

**Submission to the
Department of Social Services
Interim Home Based Carer Subsidy Programme
(Nanny Pilot Programme)**

23 July 2015

Introduction

The purpose of the Interim Home Based Carer Subsidy Programme (Nanny Pilot Programme) is to make in-home, flexible, affordable child care available to support families, particularly those who find it difficult to access child care services because they work non-standard hours, or live in remote areas or away from existing child care.

YWCA Canberra believes in the provision of quality early childhood education and care. It aligns with our values of *“Women achieving security and independence through their economic participation”* and *“Children and young people build the skills and attributes they need to create a better future”*.

For this reason, YWCA Canberra has been providing children’s services in the ACT for more than 30 years. We are one of the longest-running and most highly-respected providers of early childhood education and care in the Territory.

YWCA Canberra operates three early childhood education and care services (Campbell Cottage, Winyu and Conder), and are one of the largest employer-based providers of Family Day Care nationally. In addition, we run School Age Care at 13 primary schools across Canberra, which includes Before School Care, After School Care and Vacation Care.

YWCA Canberra believes every child has the right to high quality early childhood experiences. The UN Committee on the Rights of the Child has outlined developmental reasons why early childhood is a critical period for the realisation of children’s rights¹. During this period young people experience the most rapid period of growth and change during the human lifespan; young children actively make sense of the physical, social and cultural dimensions of the world they inhabit; young children’s earliest years are the foundation for their physical and mental health; and young children’s experiences of growth and development vary according to their individual nature as well as their gender, living conditions, family organisation, care arrangements and education systems.

¹ <http://www.ohchr.org/EN/HRBodies/CRC/Pages/CRCIndex.aspx>

Evidence shows that quality education and care can make a real difference to the educational, health and wellbeing outcomes for children. In contrast, poor quality care can be detrimental.

Scope of submission

This submission will comment specifically on:

- Affordability for-
 - Families
 - Service providers
- Duty of care, including-
 - Place of employment
 - Equipment
 - Working with vulnerable people checks
- Education

Affordability

YWCA Canberra has serious concerns about the affordability of the Nanny Implementation Programme for parents and for service providers.

Parents

YWCA Canberra believes that under the guidelines the target audience for the program will most likely not be able to afford the service.

It is incomprehensible that a household on a joint income of \$60,000 per annum could afford the cost of a nanny, even with a subsidy. The average cost of accessing this nanny service would be in about \$35 to \$40 per hour.

The guidelines advise that eligible families can engage a nanny for up to 50 hours per week. However, the guidelines are silent on overtime rates for nannies working outside normal hours, or weekend/public holiday rates.

Currently, child care educators working on weekends/public holidays attract overtime at time and a half, double, and double and a half. Educators working past 9pm would also attract overtime rates.

The cost of care will therefore increase for night care and weekends/public holidays. It is yet to be determined as to whether this increase will be paid for by parents or the DSS.

Although the guidelines state that terms and conditions for employment of nannies must comply with the Fair Work Act of 2009 (5.2 Employment contract/agreement), it is unclear how this proposed service will be viable if penalty rates are paid.

As the program is targeted at parents who work shift work and who have challenges in accessing other forms of childcare, it is a reasonable assumption that working outside what is considered normal working hours would be a frequent occurrence.

If the pilot program is to be successful, YWCA Canberra believes it vital that the question of

affordability of night time and weekend/public holiday care is addressed.

Service providers

YWCA Canberra believes that the administration fee proposed for service providers is not sufficient to administer the pilot program. According to the guidelines, the administration fee must cover:

- staff salaries and on-costs that can be directly attributed to the provision of recruitment and placement of nannies with families;
- activity in the identified region as per the grant agreement;
- employee training for staff that is relevant, appropriate and in line with the programme activity; and
- operating and administration expenses directly related to the delivery services, such as:
 - telephones
 - rent and outgoings
 - computer/IT/website/software
 - insurance
 - utilities
 - postage
 - stationery and printing
 - accounting and auditing
 - visiting family homes.

Under the fees outlined in the guidelines, the lowest income earners receiving the highest subsidy from DSS would attract an administration fee of just 30 cents per hour, per child.

YWCA Canberra is an experienced children's service provider, delivering quality and affordable early childhood education and care in Canberra for more than 30 years. We do this as a not-for-profit organisation, dedicated to keeping our services and programs affordable and accessible to all Canberrans.

In order to be able to provide the required level of administration support, an administration fee

of 16 per cent would be required. This would help to ensure the viability and sustainability of the service.

Duty of care

YWCA Canberra believes in providing quality early childhood education and care, as this time of life has critical implications for the development and long-term outcomes of children. Ensuring children's health and safety is paramount to this.

The guidelines for this pilot program stipulate that service providers are responsible for "Highest standard of duty of care in the place". However, there are several areas of the pilot program that need to be addressed in terms of duty of care.

Place of employment

The issue of who is responsible for providing a safe work environment is not addressed in the guidelines.

Under the Family Day Care Scheme, safety checks are carried out in educators' homes to ensure compliance with current regulations.

The kinds of safety requirements under the Family Day Care Scheme include:

- safety glass/safety film for windows that are above one metre from the floor
- storage of chemicals and medications out of children's reach
- knives and sharp objects out of the children's reach
- outdoor equipment in good safe repair
- barriers on stairs.

It is not clear under the guidelines if there will be safety checks and who will be responsible for them. YWCA Canberra believes this creates significant duty of care issues, both for nannies and children enrolled in the service.

Equipment

In order to provide proper care and educational activities, there will need to be some basic care and educational equipment available to children enrolled in the service.

The issue of equipment is not addressed in the guidelines.

Under the guidelines, a nanny can care for up to four children under school age and up to seven children in total (3.1.5).

Children of different ages and abilities will have differing caring and educational needs.

The issue of equipment needs to be addressed, in particular:

- Who is responsible for supplying educational and care equipment for children, appropriate to their ages and abilities
- Funding for the maintenance and replacement of equipment.

This issue would become more problematic where children from other families are cared for by the same nanny (3.1.6 Families sharing a nanny).

Working with vulnerable people

In the guidelines, families are allowed to share one nanny (3.1.6 Families sharing a nanny).

This raises the duty of care issue relating to Working with Vulnerable People checks.

Under the Family Day Care Scheme, any householders over the age of 18 are required to undergo a Working With Vulnerable People Check.

YWCA Canberra is concerned that where families are sharing a nanny, children may spend time in a household with people over 18. We believe that the same checks should be required, in order to protect the safety of the children in care.

Education

The Australian Government recognises that education is vitally important in the early years, and that children's services providers need to provide educational opportunities as well as adequate care.

In order to ensure the quality of education provided by early childhood education and care providers, the Government created the National Quality Framework and the Early Years Learning Framework.

Centre-based early childhood education and care and Family Day Care providers are required to meet the standards of the National Quality Framework and the Early Years Learning Framework.

Under the Nanny Pilot Program, there is no requirement to provide educational opportunities for children, or meet the standards of the National Quality Framework or the Early Years Learning Framework.

YWCA Canberra believes it is unacceptable to provide an early childhood service, subsidised and sanctioned by the Australian Government, that does not operate according to these existing standards.

This would create an inequitable situation where children receiving care from nannies are missing out on the educational opportunities that children in other government-sanctioned education and care services are receiving.

Recommendations

YWCA Canberra is supportive of efforts by the Australian Government in making early childhood education and care more flexible and more accessible to parents, especially those in remote and rural communities, or who require services outside regular working hours.

However, YWCA Canberra has serious concerns that the Nanny Pilot Program, as outlined in the guidelines, would be unsustainable.

Recommendation 1: The Nanny Pilot Program should operate under existing models

YWCA Canberra believes the program would be more sustainable, and provide better education and care outcomes, if it operated under existing models of care, with greater flexibility.

For example, the current Family Day Care Scheme has provision for educators to provide care outside of normal working hours. This program could be given greater flexibility, so that qualified educators could provide care in private homes.

As Family Day Care is already an established model, with service providers and trained educators, the systems are already in place to be able to provide quality education and care, including administration.

This could also help take care of concerns around safety guidelines, duty of care, and equipment that we have raised in this submission, as the Family Day Care Scheme already has guidelines to manage these issues that will only require variation, not re-invention.

A nanny scheme could also operate under the existing model of centre-based care, where nannies are managed by senior staff based at early childhood education and care centres. This would also assist with administration and other tasks, and create better efficiency outcomes, making the service potentially more financially sustainable.

Recommendation 2: Increase the subsidy for parents

YWCA Canberra believes that the costs of the Pilot Program have not been realistically calculated. For service providers operating under these guidelines, it would be very difficult, if

not impossible, to appropriately support and administer this program, under the proposed fees.

Of particular concern is that the guidelines do not adequately address the issue of penalty and over-time rates for nannies working outside regular hours.

A more realistic assessment of the costs of providing this service, and ensuring it will still be affordable to parents at the lower end of the income bracket, is required in order to ensure a sustainable and effective pilot program.

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