

The Treasury  
The Australian Government

By Email: [coronavirusbusinessliaison@treasury.gov.au](mailto:coronavirusbusinessliaison@treasury.gov.au)

22 March 2020

## IN HOME CHILDCARE AN ESSENTIAL SERVICE

Dear Coronavirus Business Liaison Unit,

The Australian Home Childcare Association represents businesses and not for profit organisations that deliver childcare services in family homes across Australia. We make this submission to bring to your attention the following issues:

1. additional measures the Government can introduce to **support healthcare workers who need access to childcare** during the coronavirus pandemic; and
2. that **In Home Childcare be considered an essential service** during this period, and be excluded from any direction to shut down that is given to childcare centres or schools in the future.

### Recommendations

The high level recommendations contained in this submission are:

- that In Home Care be considered an essential service;
- to direct healthcare workers to access In Home Care and keep their children at home, not placing pressure on grandparents for care, and ensuring healthcare workers can continue to work to support the wider community;
- Expand the Additional Child Care Subsidy (Child Wellbeing) to include healthcare workers for a period of six months to make In Home Care financially accessible during this time;
- Remove the restriction on In Home Care Educators supervising school work in the event of a shut-down of schools; and
- In the event that the above recommendations are implemented, increase the current In Home Care places to allow for increased access by healthcare workers and vulnerable members of the community to the In Home Care program for a period of no less than six months.

The recommendations above are discussed in further detail below

### In Home Care

The In Home Care regime has been operating in Australia since the year 2000 under the Childcare Benefit package and in 2018 stricter measures were imposed bringing the scheme under the Child Care Subsidy package within *A New Tax System (Family Assistance) Act 1999* (the 'Act'). There are now approximately 45 providers of In Home Care delivering care to thousands of Australians for whom other forms of childcare are not appropriate.

There are three ways in which families currently access In Home Care, as outlined in the table below. In summary, In Home Care is an essential service for families who have no other choice of childcare. For this reason, we urge the Government to consider In Home Care as an essential service during the coronavirus pandemic.

Category	Description	Examples
<b>Non-Standard Working Hours</b>	This is for families who work non-standard hours, such as a rotating roster, or hours where other childcare services are not open.	<ul style="list-style-type: none"> <li>• Shift workers such as medical professionals, or emergency services staff</li> <li>• Fly in fly out workers</li> <li>• Single parents who do not have alternate care during the hours they need to work</li> </ul>
<b>Complex Needs</b>	This is for families with complex needs and for whom mainstream childcare, outside school hours care, or vacation care programs are not appropriate.	<ul style="list-style-type: none"> <li>• A family member with a compromised immune system, e.g. premature children or people with cancer or multiple sclerosis</li> <li>• Children with complex behavioural, developmental or medical needs e.g. autism, ADHD, ODD, cerebral palsy, vision or hearing impairment</li> <li>• Children at risk of neglect or abuse for whom mainstream childcare is inappropriate</li> </ul>
<b>No Childcare Available</b>	This is for families who cannot access childcare in their area.	<ul style="list-style-type: none"> <li>• Regional or remote families</li> <li>• Families on a childcare waitlist</li> </ul>

### Healthcare Workers

Healthcare workers make up a significant proportion of the families that currently access In Home Care as most childcare services do not operate during the hours that they require care. For this reason, we urge the Government to include In Home Care as an essential service to support healthcare workers during any potential shut down of childcare centres and schools.

Despite continued access to In Home Care by healthcare workers, the current Child Care Subsidy regime makes the cost of In Home Care unaffordable for many of these workers. For this reason, we recommend that the Government implement a further measure during the coronavirus pandemic to support these workers. We recommend that the Government expand the Additional Child Care Subsidy (Child Wellbeing) to include healthcare workers for a period of no less than six months to ensure that they are able to receive the highest level of Child Care Subsidy available to access vital childcare.

We further recommend that healthcare workers be directed to access In Home Care to minimise the risk of exposure of children to infection, reduce the reliance on older family members for care, and ensure that they can work their required shifts in the healthcare system.

### Continued Assistance

As you can see, individuals authorised to access In Home Care already comprise the marginalised, the vulnerable and the vital members of our community. For this reason, we believe that the In Home Care regime is a crucial aspect of community support that must remain in place during the coronavirus pandemic. The In Home Care regime was always designed for families where other forms of childcare is not available or appropriate. For this reason, we urge

the Government to identify Home Care as an essential service, separate from any direction given to childcare centres and schools to close.

Within the Complex Needs category alone, some of these children already face risk of neglect or abuse, whilst their carers may also be placed at risk during any potential lockdown if they are unable to meet these children's needs without the assistance of In Home Care. As discussed above, healthcare and emergency services workers also make up a significant cohort of families already accessing In Home Care, and if it was to be included in a blanket shut down it would debilitate these families, many of whom are single parents with no other option for childcare.

The current Child Care Subsidy regime also prohibits the supervision of school work for primary school aged children by In Home Care Educators. In the event of school closures, we recommend that the Government lift this prohibition for six months during the coronavirus pandemic to allow those already accessing In Home Care, as well as healthcare workers and additional vulnerable Australians, to remain at home whilst ensuring children continue their access to primary education. We also believe that this will alleviate pressure on the school system and online resources.

In the event that the above measures are put in place, we recommend that the number of In Home Care places be increased to support these families. If childcare centres are not accessing the Child Care Subsidy during closure, we believe those funds could be redirected into the In Home Care program, with the option of the program temporarily engaging the childcare centre workforce for redeployment into In Home Care.

### **Health, Safety and In Home Care Expertise**

In Home Care providers have significant expertise in supporting individuals with compromised immune systems. For this reason, we believe that we have the knowledge required to continue to support Australian households with childcare during the coronavirus pandemic. Additional measures have already been put in place by providers to ensure Educators are not attending homes with any sign of illness, and families are also contacted regularly to identify if anyone in their house is sick, or has any chance of being infected with COVID-19.

The Australian Home Childcare Association Committee holds significant expertise in the childcare sector, administrative law, child protection and emergency and respite care. We therefore welcome the Coronavirus Business Liaison Unit's engagement with our Committee to further discuss the above recommendations to ensure the Australian community continues to be supported with childcare in the family home during the coronavirus pandemic.

Kind regards,



**Nicole Morgan**  
President

<p>Copy to: The Honourable Dan Tehan MP Minister for Education Commonwealth of Australia By Email to <a href="mailto:dan.tehan.mp@aph.gov.au">dan.tehan.mp@aph.gov.au</a></p>	<p>Annette Pilloni Director In Home Care Payment Policy Branch Early Childhood and Child Care By Email to <a href="mailto:Annette.PILLONI@education.gov.au">Annette.PILLONI@education.gov.au</a></p>
<p>The Honourable Sarah Mitchell Minister for Education New South Wales Government By Email to <a href="mailto:office@mitchell.minister.nsw.gov.au">office@mitchell.minister.nsw.gov.au</a></p>	<p>The Honourable James Merlino MP Minister for Education &amp; Emergency Services Victorian Government By Email to <a href="mailto:james.merlino@parliament.vic.gov.au">james.merlino@parliament.vic.gov.au</a></p>
<p>The Honourable Grace Grace MP Minister for Education Queensland Government By Email to <a href="mailto:education@ministerial.qld.gov.au">education@ministerial.qld.gov.au</a></p>	<p>The Honourable Sue Ellery MLC Minister for Education and Training Western Australian Government By Email to <a href="mailto:Minister.Ellery@dpc.wa.gov.au">Minister.Ellery@dpc.wa.gov.au</a></p>
<p>The Honourable Joel Gardner MP Minister for Education and Child Development South Australian Government By Email to <a href="mailto:Minister.Gardner@sa.gov.au">Minister.Gardner@sa.gov.au</a></p>	<p>The Honourable Yvette Berry MLA Australian Capital Territory Government By Email to <a href="mailto:Berry@act.gov.au">Berry@act.gov.au</a></p>
<p>The Honourable Selena Uibo Minister for Education Northern Territory Government By Email to <a href="mailto:minister.uibo@nt.gov.au">minister.uibo@nt.gov.au</a></p>	<p>The Honourable Jeremy Rockliff Minister for Education Tasmanian Government By Email to <a href="mailto:jeremy.rockliff@dpac.tas.gov.au">jeremy.rockliff@dpac.tas.gov.au</a></p>