

Submission To The Productivity Commission

Who am I and why have I written to you

- As an owner of a private nanny agency since 1988
- As a Board member of the American based International Nanny Association –
 - first international and first hence first Australian Board member -2013/2014,
 - Second Vice President 2014- 2016
 - Current Chair of I.N.A Ethics Committee- 2013/2014
- Owner of inaugural government approved In-home child care service 2000-2014
- N.I.C.A. founding member (National In-home Childcare Association)
- Ex Nica Board as Treasurer
- Pr Subcommittee Nica board 2013/2014
- Represented NICA Senate Steering Committee to write Interim In Home care standards 2006
- Represented NICA, CCMS Industry Task Force- 2006/2007
- Representative Industry Training Board on Certificate 3 Accreditation 1998 (when running an RTO)
- Chairperson of AANA – Association of Australian Nanny Agencies 2003/2004
- As an individual and mother of two grown children
- As an Australian Citizen

“Difficulty accessing suitable care for your child”

Availability

1. Government approved In-home care scheme exists and has done so since 2000. In Home care standards and the long form funding agreement ensure accountability, regulation and sanctions if due process and diligence is not followed.
2. Where In Home care exists approved care is available 24/7

Remedy

- Utilise the systems in place with already government approved In Home care services
 - Make more approved In Home care places available
3. In Home care currently has a double hoop that parents must jump through that parents requiring other government forms of childcare are not required to do i.e. to access In Home care you must have firstly no access to other forms of care, and then as well meet In home care eligibility. No other approved childcare requires these terms.

4. *Remedy*

- Drop extra requirements for In Home care and make it accessible to all those requiring childcare

“Whether affordability is a significant barrier to your use of child care and returning to work or study”

Affordability

1. In home childcarers must be either employed by agencies if they are a labour hire firm or according to Deewr in 2012, childcarers must be independent contractors

with abns or run their own Pty Ltd company. This is in direct conflict with ATO that an In Home Childcarer working with one family for more than 6 months who has no control over her hours, work conditions or cannot put in another replacement Childcarer is either an employee of family or of the labour hire firm i.e. the Agency.

2. Families who employ their childcarers privately cannot access the rebates CCR/CCB

Remedy

- This makes private in home childcare very expensive and would be cheaper if families were able to employ their In-home Childcarer legally and claim rebates through an approved Agency.
- Deewr really need to sort out the issue with the ATO of who legally has to pay the Nanny.

2. Nanny Sharing

The ratio of In- Home childcare is 1 to 4. For families with only one child sharing can quarter the costs of In home childcare. Some but not all families may be eligible for rebates. This has the added advantage of socialization if this is a one child family. Placement Solutions have plenty of models of this working really well for only children and incurring all of the above benefits.

Is current support for families through Child Care Benefit, Child Care Rebate and JET adequate and do you understand your eligibility?

- **No – plain English is needed to interpret and understand government acronyms**
- **Complicated forms need to be simplified**
- **3 types of forms – currently exist**
 - **initial one to get a CRN and baby bonus**
 - **Next to get Family Tax benefit A and B**
 - **Next to get CCB/ CRN**

Remedy

- **One form and all parents are signed up to CCB/CCR regardless of whether they are going to use it – would save heartache when a family is in crisis and has to wait up to 28 days to get a CRN number and CCB percentage and childcare hours of 24/50**
- **Could a number be automatically generated online if only temporarily?**
- **Insistent use of term in government advertising “50 percent rebate” so parents think that they are getting 50 percent off all fees all year and do not understand it is capped at \$7500 per year per child**

Remedy

Please stop using misleading advertising

JET

- **Misunderstood by parents**
- **Guidelines seem to have changed – no longer just for sole parents returning to work force?**
- **Open to roting by parents utilising 12 hours of childcare per day when only 2 or 3 is needed for the actual course or study**

Remedy

- ***Should be confined to when they are actually studying or working not 12 hour day blocks and not in university breaks***
- ***Little known as is In Home care – both need to be promoted BY FAO and DEEWR***
- ***Advertise and support In Home care – we once had staff in Victoria who actively supported In Home Care agencies. Vicki Pateras was wonderful in the role, but since then we only see people when there is a sanction, compliance or complaint from the public***
- ***However, there is no vehicle for us to complain of public, put our viewpoint or complain of unethical practises of other agencies.***
- ***Treated like criminals by previous compliance officers and yet there seems to be no systems in place to ensure quality standards are met.***
- ***No confirmation receipt or feedback from the department when we do put in a complaint or a serious incident report about a client or child or carer.***

SCCB – within In Home Care in particular.

- ***We are expected to be gatekeepers and de facto social workers making decisions as to whether a family are able to access SCCB.***
- ***Due to the fact that DEEWR does not actively promote In Home care anymore many maternal health nurses etc believe In Home care is only for SCCB***

Remedy

- Provide social workers within Deewr or the SCAT team to make health assessments, allowing us to get on with our real job of placing and supporting both placed Childcarer and ill parent
- Promote and advertise to health providers the full scope of In home care

Remedy

- Employ pro-active State Deewr officers who support quality In Home care standards and best practise for children in care. Ensure they have scope to visit, liaise and power to do spot checks
- Sanctions imposed on those agencies that do not meet the above quality standards
- Reference group in each state to monitor and liaise as a united childcare sector

Should support be extended to all types of child care? E.g. nannies providing in-home care

I am opposed to the rebate being extended to nannies until the following are addressed

- ***It is estimated that more than 50 percent of nannies in this country are cash in hand or working incorrectly with ABNs***
- ***A nanny needs a child care focused job description and would not do housework over and above child related***

- *Would you plan to also extend the rebate to the Au pair Schemes? Many advertised sites are breaking Australian employment laws by employing Au Pairs on \$60 to \$145 per week plus food and Board. Wage line says in regard to live in nannies that a worker must have an hourly rate of pay. Au Pair guidelines of working 15 hours per week for pocket money with primary school aged children and not undertaking sole charge work with under school age are being flouted.*
- *Currently an old scheme left over from pre 2000 still exists where registered carers can write receipts so that families can claim a small amount each week of \$43.20 per child maximum.*
- *Remedy*
 - Research the cash in hand market starting with FINDABABYSITTER an online company owned by Murdoch*
 - Investigate the Au pair Agencies that are not following guidelines and employment law.*
 - Make sure any Nanny working is paid legally, fairly and works to a job description*
 - If all of the above is too much no do not extend the rebate to nannies but broaden government approved In-home care*

ANA – The Australian Association of Nannies of which I am not and never have been a member has 20 members most of which have been provided with a free membership. The President and Secretary and a Board member are all registered nanny agencies with their own agenda outside the interests of individual nannies. I believe they have a basic conflict of interest within their organization as it is defined.

- *If you have a child with additional needs or live in a remote area are there any shortcomings in meeting your needs?*
- *In Home care as it currently exists is for childcare workers and not disability workers. We, at this agency, believe that duties such as catheter changes, heavy lifting, nasal gastric feeding as well as the administering of regular injections are outside the scope of the nanny experience and qualifications.*

Remote area

I can only comment on this indirectly. I know for a fact from personal observation, whilst visiting my daughter working at Central Australian Women's Legal Service that child care is not available for the indigenous town camps where it is sorely needed nor is In home childcare available for Alice Spring parents in general. We tried for 3 years at the request of DEEWR to operate a facility in Bendigo a rural city in need of In home childcare. Without more operational funding it became impossible to run this effectively from our main office in Melbourne. We know exactly what we would need to do to run an office in Bendigo with our Head office remaining here and would happily talk to the department about this.

- *Other factors that may be influencing your decisions about participating in work or study?*

My points can be summed up thus

Generally

1. ***CCB – raise means tested limit for families – \$260,000 both incomes combined***
2. ***CCR – means test it after \$ 260,000 both incomes combined***
3. ***Lift the cap of In Home care places for currently approved In Home care***
4. ***Drop the double eligibility requirement for In Home care as currently exists***

5. *Make it more available country wide*
6. *Ensure In Home care standards are met and the agencies are monitored over and above compliance monetary issues*
7. *Make In Home care part of the national Quality Framework*
8. *Discuss with the ATO and Fair Work Australia exactly the status of In-home childcarers, nannies and Au Pairs*