



Feedback Submission  
Interim Home Based Carer Subsidy  
Programme (Nanny Pilot Programme)  
Guidelines





# Australian Childcare Alliance

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## **Interim Home Based Carer Subsidy Programme (Nanny Pilot Programme) Guidelines**

The Australian Childcare Alliance (ACA) is the national peak body representing members in the long day care early childhood education and care (ECEC) sector throughout Australia, with offices in Victoria, New South Wales, Queensland, South Australia, and Western Australia and representation in all states and territories. ACA works on behalf of long day care owners and operators to ensure families have an opportunity to access affordable early childhood education and care throughout Australia. ACA and its state associations work with all levels of government, regulatory authorities and other stakeholders to ensure that families are supported into the future with a sustainable, affordable and viable sector.

ACA welcomes the opportunity to provide feedback on the Interim Home Based Carer Subsidy Programme (Nanny Pilot Programme) Guidelines. It should be noted that ACA has had very limited time to review these Guidelines in detail, owing both to the fact that only one week was provided to provide feedback, as well as the fact that ACA is currently busily preparing its detailed submission in response to the Child Care Assistance Package Regulation Impact Statement, due at the end of the month.

As an overarching comment, and as outlined in our submission in response to the *Draft Productivity Commission Report on Childcare and Early Childhood Learning*<sup>1</sup>, while ACA understand that the Australian Government is broadly committed to providing some form of “informal” type care through the nanny sector, ACA cannot accept that this form of care – excluding education – is overall the best for children. Whilst noting that this is a trial only, ACA is strongly opposed to this form of care (which cannot be considered education and care) being subsidised when it is not subject to the rigours of the National Quality Framework that other forms of early childhood education and care are. We remain concerned that with state regulators kept separate from the process, there will be insufficient regulatory and compliance checks, with random and targeted inspections by regulatory authorities likely to be almost negligible without additional funding to regulators.

We remain very concerned that service providers are not required to be approved providers under the National Quality Framework, which further segregates this trial from “mainstream child care”, as it is termed in the guidelines.

We note that the Department of Social Services is seeking feedback on the draft guidelines, rather than the merits or otherwise of the trial itself. With this in mind, ACA submits the following feedback:

### **Priority of Placement**

ACA is concerned that the guidelines do not provide enough clarity as to what will be accepted as an ‘activity’, such as unpaid work in a family business, irregular but intensive periods of work (paid or otherwise) in a rural business (eg during harvest periods) and so on. Simply advising parents that they must be “in approved work, training or study” could significantly impact on subscription levels.

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<sup>1</sup> Australian Childcare Alliance (2014) <http://www.pc.gov.au/inquiries/completed/childcare/submissions/post-draft/submission-counter/subdr823-childcare.pdf>

### **Selection Criteria for Service Providers**

ACA is concerned that the selection criteria for service providers do not include outcomes for children, and instead focus only on planning/administration; project delivery; and service delivery. ACA is also surprised that a 24 hour hotline is referenced as an example of “sufficient policies and procedures” to ensure the safety of the nanny within the family home. ACA strongly suggests that the policies and procedures developed by early childhood education and care services be referenced in order to provide guidance in this area.

### **Qualifications and First Aid Requirements**

ACA wishes to state – again – its strong opposition to nannies not being required to hold formal qualifications. ACA is also deeply concerned that asthma and anaphylaxis training – mandatory in early childhood education and care services (both centre-based and family day care) – is deemed an optional extra under the programme guidelines. Given that anaphylaxis can strike without warning, at any age, it is remarkable that nannies are not being required to hold the same first aid qualifications as early childhood educators. ACA believes that children will be at risk unless nannies hold this important training.