

Response to Family Assistance Legislation Amendment (building on the Child Care Package) Bill 2019 (provisions)

Summary

KU Children's Services (KU) welcomes the opportunity to provide further comment in relation to the *Family Assistance Legislation Amendment (building on the Child Care Package) Bill 2019 (provisions)* and acknowledges the continued dialogue with the sector that has been facilitated by the Government regarding the Bill.

KU recognises the opportunities to provide feedback on the Child Care Subsidy System (CCSS) through the Government's stakeholder engagement strategies, and welcomes the effort made by the Government to review and improve and refine Family Assistance Legislation.

Previously this year, KU has provided ongoing responses to the effectiveness and efficiencies of the CCSS primarily through participation at both the Industry Transition Reference Group (ITRG) now called Early Childhood Education and Care Reference Group, and the Communications Working Group, and through direct engagement with Hon. Minister Tehan MP.

Response

KU supports the proposed amendments to the Family Assistance Legislation Bill 2019 as documented in *A Bill for an Act to amend the law relating to family assistance, and for related purposes*, particularly:

- Removing the 50% limit on the number of children that a provider can self-certify for ACCS (child well-being), thereby reducing the barriers to vulnerable children accessing childcare.
- Allowing the Minister for Education to prescribe circumstance in which a 3rd party may contribute to meeting the cost of an individual's child care fees without affecting that individual's Commonwealth child care subsidies, thereby helping to ensure that the cost of child care is not a barrier to accessing child care for those vulnerable/disadvantaged children.
- Allowing the Minister for Education to prescribe specific circumstances in which Commonwealth childcare subsidies can be paid where the child is absent at the start or end of an enrolment, thereby ensuring families are not disadvantaged inappropriately.
- Increasing the number of weeks at which enrolment automatically ceases due to non-attendance from 8-14 weeks, thereby reducing the regulatory and administrative burden on both families and providers by eliminating the need for children to be re-enrolled following most regular breaks in attendance.
- Enable the capacity of the Minister to prescribe other payments in the Minister's Rules that an individual may be receiving in order to be eligible for ACCS (Grandparent). This will enable the Minister to prescribe ABSTUDY as a payment for the purposes of determining ACCS (Grandparent).
- Replace the term 'appropriate State/Territory body' with 'appropriate State/Territory support agency' to remove the ambiguity that has been caused by conflating this term with mandatory reporting schemes in relation to child abuse and neglect.
- Amendment of paragraph 85CA(2)(b)(i) so that a provider is eligible for ACCS (child wellbeing) in relation to a session of care provided to a child where they are not able to identify an individual who is eligible for CCS, thereby aligning provision with policy intent.

KU believes that the focus of the Child Care Subsidy System (CCSS) should ensure that the rights of every child to access affordable and accessible early childhood education and care is paramount, and that the family Assistance Legislation should reflect such.

For further details and information, please don't hesitate to contact Christine Legg, CEO, on
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