



Submission to the Productivity Commission Inquiry into Child Care and Early Childhood Learning.

The Australian Nanny Association Incorporated (ANA) was established in 2012 by a small group of nannies and nanny agency owners to provide a support network for Australia's large nanny community, the families who engage their services and the agencies who facilitate the employment of nannies. ANA endeavours to educate the public about the role of nannies within Australia's child care system, and to assist those involved in the sector to work towards a more regulated and professional industry. ANA is the first Australian association to represent all sections of the nanny industry, and believes that the nanny industry can achieve the best possible outcomes for all involved by working together as a whole.

ANA is currently staffed by a volunteer committee of seven made up of four nannies, one parent, one nanny agency owner, and an owner of a home services agency which includes nannies. All committee members work full time in the nanny industry, with the exception of the parent who works part-time and is a stay at home parent the rest of the time. They all devote as much of their spare time as possible to ANA.

ANA believes Australia must strive for a fair and equitable childcare system that supports parental choice, improves opportunities for parental workplace participation, offers fair employment conditions for both childcare staff and nannies, and provides quality and needs-specific care for children.

ANA acknowledges the value and benefits of the government subsidised services currently available to Australian families and children such as Long Day Care, Family Day Care, Out of School Hours Care and Pre-School programs. We agree that these services are essential and ANA does not advocate for any reduction in support for any of these services. However, we consider that nannies play a complementary role in relation to these services, particularly where such services are unable to meet the specific needs of a family or a child. As such, ANA believes that nannies should be recognised, by the broader childcare industry and by government, as a key part of Australia's regulated and subsidised child care system.

Gaps in Australia's current childcare system:

The majority of Australian children who require non-parental supervision for extended periods are cared for in government subsidised child care facilities. This service is invaluable for families. However, the changing nature of work and the changing patterns of Australian's working lives mean the system is unworkable for some families. For example:

- Long waiting lists and unavailability of flexible care are causing parents to either defer returning to work after having children, or not return to work at all.

- Illness exclusion policies in group care settings results in lost productivity due to parents having to take time off to care for sick children. Lack of available school holiday care is another reason for parents taking time off work.
- Parents whose employment hours are outside those of standard childcare settings are unable to return to work due to lack of childcare options.
- Lack of appropriate childcare available to shift workers can mean small children are taken out of their home to be cared for overnight elsewhere.

Current utilisation of nannies in Australia.

The ANA believes there is approximately 30,000 nannies currently working in Australia, however the number may be significantly higher due to parts of the industry being informal.

Nannies are already working within the existing government subsidised system in limited numbers through the In Home Care and Special Childcare Benefit schemes. These placements are limited to 7,000 nationally and have set criteria such as families having three children under the age of five years, a lack of available childcare in the area, parents working non-standard hours or parental illness.

Outside of the government subsidised childcare system, some families currently use nannies in a private capacity to meet their child care needs often in circumstances where the system is inadequate as discussed above or where they are not eligible for or cannot access the In Home Care or Special Childcare Benefit schemes.

Nannies are mostly employed (either in a full-time, part-time or casual capacity) in private arrangements with families or through a nanny agency. The circumstances under which a family chooses to use a nanny are variable but some examples are set out below:

- For before and after school care, including transporting the children to and from school and extra-curricular activities.
- By families whose children are not suited to Long Day Care (e.g. due to special needs).
- By families who have childcare needs outside traditional hours.
- To provide overnight care for infants and assistance with settling strategies for parents struggling with parental exhaustion (particularly in families who have had a multiple birth).
- By families who are unable to secure a position in Long Day Care due to long waiting lists or limited availability.
- By families who have three or more children due to cost effectiveness in comparison to paying for three or more Long Day Care positions.
- In nanny share arrangements where two families share the cost of the nanny to provide childcare in one of the families' homes.

- On a casual basis when regular childcare arrangements are unavailable, on days that aren't usual work days when the parent is obliged to attend the workplace, or when children are sick and can't attend their usual day care, pre-school or school.

Nannies provide developmentally appropriate educational activities for children and take them on excursions to museums, zoos, play dates with other children and various other activities. Nannies can easily cater to children's individual interests and needs due to lower carer to child ratios, which can be as low as 1:1. The majority of three and four year old children in the care of nannies also attend pre-school, and nannies are able to support that learning in the home with reinforcement and extension of pre-school activities.

Costs of employing a nanny

Families who choose to use nannies privately are not able to access any government assistance and cannot take advantage of the childcare rebate when paying their nanny for his or her child care services. This is the case even where, for the reasons discussed above, other child care options unavailable or inappropriate.

Nannies are paid on an hourly basis. The rate is dependent on the number and ages of children, level of expertise required (e.g. multiple infants, special needs), and the nanny's qualifications and experience, however typically the range will be between \$20 and \$35 per hour. This is a significant financial burden for the majority of families and is a disincentive for parents to return to work where there are no other appropriate child care options.

Recommendation 1:

The ANA considers that in providing flexible, needs-specific care within the child's own environment, nannies help to meet a demand created by the gaps in the existing child care system. Where this is the case the ANA believes that families that use nannies should also be entitled to the government assistance which is currently available to other child care services.

Risks associated with the absence of government assistance for the nanny industry.

As noted above, the lack of government assistance for nannies can have an impact on productivity where parents are required to be absent from work in order to care for their children. Alternatively, in order to remain at work, some parents may seek out other childcare services that are available at a level they can afford. For example:

- Some families may employ unqualified and/or inexperienced people who represent themselves as professional nannies.
Some families may host an au pair¹ in order to use them as low-cost childcare. Au pairs generally have limited childcare experience or qualifications and are unlikely to hold first aid accreditation or have been the subject of working with children or criminal records checks.

¹ An au pair is generally a young woman or man from a foreign country looking for new intercultural experience. They agree to assist the host family with in-house care of their children and light housekeeping duties. (Au Pair Network aupairnetwork.com.au)

Recommendation 2

ANA recommends that any government assistance provided to a family for the use of a nanny should be conditional upon the nanny being appropriately licensed.

A significant number of nannies already hold early childhood qualifications equivalent to those held by staff employed in Long Day Care, and many have worked in Long Day Care or other Early Childhood Education and Care facilities before transitioning to childcare in the home.

ANA believes that generally these professional nannies are in favour of regulation of the nanny industry. Regulation of the industry may benefit not only families but will also facilitate employment of professional nannies. For example:

- Regulation may help professional nannies to obtain positions offering all required safeguards and entitlements (such as workcover insurance, superannuation and payment of PAYG tax).
- Licensing will assist families to select appropriately qualified and screened nannies.

In 2013, ANA released suggested minimum standards for nannies, and enforces these minimum standards with members. (See appendix 1). Further, the ANA is happy to be considered under the National Quality Framework with similar guidelines to the model of Family Day Care. The ANA would like to see the existing in home care scheme model used as a guide for expanding childcare options.

ANA would like to see in home childcare supplied by service providers who meet an eligibility criterion to supply qualified nannies and in home carers under the National Quality Framework.

Recommendation 3

ANA recommends that Working With Children Checks be made national.

Working With Children Checks are currently done on a state by state basis which causes difficulties for nannies and employers, particularly those residing close to state borders. A national check would reduce confusion and streamline the process ensuring all people working with children have the appropriate checks done and children are safe.

Proposed (Nanny) Model of Care.

Nanny Criteria	Regulation
<p>Must hold, or be working towards minimum of Certificate III in Children’s Services.</p> <p>Must hold a current Working with Children Check as per relevant state/territory requirements.</p> <p>Must hold a current First Aid certificate and complete annual CPR refresher course.</p> <p>Must obtain public liability insurance.</p> <p>Must meet annual professional development requirements. May include (for example):</p> <ul style="list-style-type: none"> • Child protection • Occupational Health and Safety • Food Safety • Behaviour Management • Child Development 	<p>Service providers who meet licensing criteria and wish to provide subsidised in home childcare should be able to apply to the licensing body (currently DEEWR) for a license to supply a coordinated nanny service in the family home.</p> <p>Rather than a set amount of places per service, licensed service providers should be able to apply for places to be allocated on a needs basis to meet demand.</p> <p>Service providers support their nannies to work under the National Quality Framework and within the Early Years Learning Framework. Coordinators to oversee this, similar to some parts of the In Home Care Scheme and Family Day care.</p>

Appendix 1.

1. Australian Nanny Association Minimum Standards / Membership Criteria for Nannies:

Nanny members must:

- Be a minimum 18 years of age.
- Be actively working as a nanny or have done so in the past three years with intent to continue in the future.
- Provide two contactable work related referees.
- Hold a current Working with Children Check as per relevant state/territory requirements.
- Hold a current ANA approved Level 2 First Aid qualification.
- Hold a current ANA approved CPR qualification and update yearly.

Nanny members are encouraged to:

- Obtain a yearly Federal Police Check.
- Obtain their own personal public liability insurance.
- Be studying towards or hold a minimum childcare qualification as advised by the Australian Children's Education and Care Quality Authority (www.acecqa.gov.au).
- Participate in professional development training and/or workshops.

Australian Nanny Association

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