

The Hon. Stuart Robert
Acting Minister for Education and Youth
Minister for Employment, Workforce, Skills, Small and Family Business
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

13 January 2022

Re: Recommendations to reduce the continued adverse impact of the COVID-19 pandemic on education and care service provision

Dear Minister,

The current wave of the COVID-19 pandemic is causing major disruption to the provision of education and care services due to a combination of reduced attendance and significant staff shortages due to illness and isolation requirements. These trends are resulting in service and room closures and significantly adverse financial viability outcomes. The rules and strategies established to support 'COVID-Normal' are no longer relevant, given the extent and impact of the current outbreak. Details of the impact on our over 3,000 member services, are detailed below:

1. High levels of onsite exposure and staff absences

The levels of COVID-19 in the community and the contagiousness of the Omicron variant mean that services are regularly experiencing exposures onsite to staff and children. This results in both children and staff being absent due to contracting COVID-19 or/and meeting state and territory workplace and household isolation requirements. Member services are currently reporting that more than 25% of staff are absent due to testing positive, exposure to positive cases, or having symptoms. The combined effect of service exposures and high levels of community transmissions impacting on staff are resulting in severe workforce shortages which often results in room and service closures.

2. Lack of access to Rapid Antigen Tests

Services do not have access to Rapid Antigen Tests (RATs) that they need to ensure that their services can operate safely. Staff and families do not have access to the required number of Rapid Antigen Tests to ensure that they are not carrying and further transmitting the virus within services. Without access to RATs staff who have been exposed but are asymptomatic are attending work with vulnerable children who cannot be immunised, which further increases the risk of COVID spreading within services. Access to RATs would reassure families and other staff that the workplace is as safe as it possibly can be.

3. Reduced attendances

Attendance numbers are reported as being markedly down, a trend which is expected to worsen in the coming weeks as the peak of the outbreak is reached. Families are not sending their children because of concerns they will catch the virus and others are delaying starting their children for the first time at a service. Other families are isolating because of positive cases, close contacts or awaiting test results. It is anticipated that the additional extra allowable absences of 10 days for the 2021-22 financial year (in addition to extra absences granted during COVID-19 lockdowns) will not be sufficient.

The reduced attendances are also impacting on service viability as services are unable to collect the same fee income as was budgeted. As has been reported in the media, some children aged 5+ years who are scheduled to receive their first vaccination are being turned away due to a lack of supply. This means children who could have been vaccinated may have a delayed return or start date if families choose to wait until they believe their child is better protected.

4. Fee waivers

Many families are requesting fee waivers as they cannot, or do not wish to, send their children to the service for reasons stated above or are reluctant to send their children given their lack of protection from the virus. Some services have families withdrawing their enrolment, so that they don't have to continue to pay fees while their children are not attending. Services are keen to retain families because of their connections to local communities and a desire to provide uninterrupted service. The current guidance about waiving fees is no longer broad enough to cover the current situation.

Services can currently waive gap fees for a child that does not attend care because they, or a member of their household, have been directed to isolate due to COVID-19. Services can also waive gap fees and receive Child Care Subsidy (CCS) where a child cannot attend care because the service, or a room within a service, is closed due to COVID-19 on advice from the state or territory government. Services can continue to waive gap fees for children not attending care where a state or territory restricts access to child care in a region. However, services cannot waive gaps fees if they do not have enough staff to accommodate some (or all) of the enrolled families or if families are choosing not to attend because of safety concerns.

5. Service viability

Staff absences, reduced attendance and fee waiving are all having a significant impact on service viability. Many services are currently unable to offer fee waivers for all families who are not attending due to COVID, because of the negative financial impact this would have on their service. Without fee waivers, more families are at risk of withdrawing their children completely.

We note that many of our members have not increased fees in over two years and we have received feedback that they need to increase fees at this time to ensure their services remain viable into the future.

Recommendations to ensure unvaccinated children are kept safe, families can continue to participate in their workforce activities and staff in education and care services are available to deliver services:

- 1) *Australian Government institutes a COVID absence payment as part of the Child Care Subsidy (CCS) System*
 - a) *A service would mark a child absent for an expanded COVID related reason as listed above*
 - b) *The service waives at least 15% of the gap fee for that child*
 - c) *The service is paid the top CCS payment for that child of 85% of the CCCS hourly cap*
 - d) *Families can enrol children without starting attendance to allow services to claim COVID absence claim for these children*
 - e) *As part of opting into this scheme the service provides a staffing guarantee, and*
 - f) *Service are not required to freeze their fees again.*
- 2) *Australian Government encourages all State and Territory Governments to:*
 - a) *make COVID-19 boosters a mandatory requirement for ECEC staff*
 - b) *Secure sufficient supply of RATs and distribute free of charge to all education and care services, and*

- c) *Prioritise early educators as essential workers and have priority of access to vaccine booster appointments.*
- 3) *Australian Government increases allowable absences to include unlimited COVID-related absences*
- 4) *Australian Government does not consider reducing child staff ratios or staff qualification requirements in response to this COVID outbreak.*

We acknowledge that the CCS related recommendations will require system and process changes, but this is the outcome that we believe best meets the needs of children, staff and employers. We highlight too that we are happy to work with you to overcome these system challenges with robust input from across the sector and our members.

Without measures, such as those recommended above, to safeguard education and care services, the risk of systemic adverse service viability outcomes and service closures will be catastrophically increased. If this risk is realised, the economic recovery from the impacts of the latest COVID-19 pandemic trends will be unnecessarily protracted.

We thank you for your consideration of these recommendations to ensure the ongoing safety of Australian families, children and the education and care workforce. Swift action on these recommendations will also prevent imminent closure of services due to financial viability issues.

For further information on these recommendations, please contact Lisa Minchin by email at lminchin@elaa.org.au or by phone on 03 9411 4124.

Sincerely,



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