



MINDEROO FOUNDATION

Thrive by Five submission to Productivity Commission



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21 February 2024

Attention:

Lisa Gropp, Commissioner
Martin Stokie, Commissioner
Deborah Brennan, Associate Commissioner

Early Childhood Education and Care Inquiry
Productivity Commission
Locked Bag 2, Collins St East
Melbourne Vic 8003

Submitted via email: childhood@pc.gov.au

Dear Ms Gropp, Mr Stokie and Ms Brennan,

We welcome the opportunity to comment on the findings and recommendations in the Productivity Commission's draft report, *A path to universal early childhood education and care*, and to address the information requests.

Minderoo Foundation is a proudly Australian philanthropy that fights for a fairer future. We incubate ideas, advocate for systems change and accelerate impact.

Through our Thrive by Five campaign, Minderoo advocates to transform Australia's early learning and childcare system into a comprehensive, high-quality, universally accessible and affordable early learning system.

Our overarching recommendations, as outlined in our attached submission, are as follows:

- 1. Set a long-term vision for early childhood education and care (ECEC), including ECEC as part of a broader early childhood development (ECD) system.**
- 2. Ensure strong public management of ECEC to achieve a universal system.**
- 3. Enact legislation that guarantees a universal entitlement for all children and establishes an Early Childhood Commission.**
- 4. Provide a detailed pathway to achieving universal access to ECEC.**
- 5. To address the undersupply of ECEC in outer metropolitan, rural and remote areas, implement a child-centred, supply-side, fixed-fee funding model (such as the \$10-a-day model used in Canada) in parallel to the Child Care Subsidy (CCS) funding approach.**



If you have any queries relating to our submission or would like to discuss further, please contact our Government Relations team at gov.relations@minderoo.org or Jay Weatherill

Yours faithfully,

Penny Dakin
Executive Director, Communities
Minderoo Foundation



1. Introduction

Minderoo Foundation is a proudly Australian philanthropy that fights for a fairer future and seeks effective, scalable solutions to dismantle the systems that entrench inequality.

This is why Minderoo established its Thrive by Five campaign to transform Australia's early learning and childcare system. Led by Jay Weatherill AO, former Premier of South Australia, Thrive by Five advocates for a comprehensive, high-quality, universally accessible and affordable early learning system for all Australians.

We commend the Productivity Commission's (Commission) Inquiry into Early Childhood Education and Care (ECEC) for delivering the draft report titled *A path to universal early childhood education and care* (the report).

We support the Commission's critique that our current ECEC system needs reform, the need for coordinated action by federal, state and territory governments and a recognition of the need for new funding models. The report clearly highlights the ECEC system in Australia needs reform. This is underscored by the Australian Competition and Consumer Commission (ACCC) Interim Report [i] and Final Report [ii], and the South Australian Royal Commission into ECEC (SA Royal Commission) [iii]. In recognising that the current ECEC system in Australia is not working for many children and families and making recommendations for improvement, the Commission has already made a significant contribution to driving policy change to ensure Australian children will meet their potential.

The Terms of Reference from the Treasurer clearly state the Australian Government's ambition: *"The Government is committed to identifying solutions that will chart the course for universal, affordable ECEC – in the great tradition of universal Medicare and universal superannuation"* [iv].

The Australian community expects the Australian Government to deliver more accessible and affordable ECEC. The recent reviews into ECEC, such as the ACCC Inquiry into Childcare (ACCC Inquiry), the SA Royal Commission and New South Wales reviews [v]; preschool reforms being rolled out in states and territories; and the ambitious terms of reference, provide a powerful mandate for the Commission to shape ECEC into the future.

There is no better time for the Commission to take advantage of this momentum to make a once-in-a-generation recommendation to the Australian Government. The opportunity for reforming the ECEC system is now.

There are some issues that we believe the Commission should consider when preparing the final report. First, Minderoo does not believe that the Commission has provided recommendations that are sufficiently comprehensive to deliver on the ambition of the Australian Government. Much of the report focuses on changes to ECEC within the current Child Care Subsidy (CCS) approach. The report acknowledges, along with the ACCC inquiry, that the existing CCS-funded system is unlikely to deliver universal high quality, affordable ECEC in all Australian communities.

Given this, it is important for the Commission in the report to analyse "other broader funding options" [vi]. The Commission has recommended that further funding reform be investigated "once the suite of



proposed reforms have been implemented". This should be completed as part of the current Commission inquiry, and alternate funding options presented to the government in the final report.

Second, Minderoo asserts that the draft report does not give due consideration to the needs of parents. In the Terms of Reference, the government asks the Commission to focus on the two purposes of ECEC: reducing barriers to workforce participation and supporting children's learning and development [vii]. While a strong focus on the needs of children is important, addressing the concerns of parents, such as affordability, is also vital and can be a barrier to children getting the developmental support they need. This would also address broader policy goals of the government, including workforce participation, productivity and gender equality. Female workforce participation should be addressed more directly in the report.

The final report must provide the Australian Government with comprehensive long-term reforms and recommendations that provide a pathway to achieve a universal, accessible and affordable ECEC system. Accordingly, we make five overarching recommendations to the Commission for consideration in the final report.

2. Overarching recommendations

1. Set a long-term vision for ECEC, including ECEC as part of a broader early childhood development (ECD) system.
2. Ensure strong public management of the ECEC system to achieve a vision of a universal system.
3. Enact legislation that guarantees a universal entitlement for all children and establishes an Early Childhood Commission.
4. Provide a detailed pathway to achieving universal access to ECEC.
5. To address the undersupply of ECEC in outer metropolitan, rural and remote areas, implement a child centred, supply-side, fixed fee funding model (such as the \$10 a day model used in Canada) in parallel to the Child Care Subsidy (CCS) funding approach.

In our submission we provide:

- **Overarching recommendations** – areas of major reform that are needed to achieve universal and affordable ECEC (1-4 above).
- **Example of a new funding model** – we provide an example of how a new supply-side funding model could be implemented to address the accessibility and affordability of ECEC in underserved or unserved communities. This could be established and filled out by government over the next 10 years.
- **Responses to the (selected) recommendations in the draft report**, where we have evidence or expertise to contribute.
- **Information requests**, where we have evidence or expertise to contribute information that may be useful to the Commission.



2.1. Set a long-term vision for ECEC, including ECEC as part of a broader early childhood development system

Minderoo supports the Commission's recommendation to amend or abolish the Activity Test. This recommendation is a paradigm shift in how we view the role of the ECEC system and moves its purpose from simply increasing workforce participation of parents to one where the child is the focus and recognises ECEC's dominant role in the education and development of children.

We support the Commission's vision that universal ECEC means making quality ECEC services available to all families, and that all children aged 0-5 should have access to 30 hours or three days a week of quality ECEC.

However, we would encourage the Commission in its final report to describe a detailed long-term vision for ECEC to recognise and enforce that ECEC is part of a broader Early Childhood Development system, one that encompasses early childhood health, childcare, preschool, family and community services, and benefits such as paid parental leave.

The SA Royal Commission envisions ECEC services as being the "backbone" of a broader early childhood development system. Of all the early childhood services, ECEC engages most frequently with families and could be the anchor point for families accessing other development services [viii]. These services would include child health services, parenting services and community programs such as playgroups.

Minderoo recommends that the federal, state and territory governments legislate a guarantee to universally accessible child development for all Australian children and families and that ECEC is seen as a fundamental component to that access.

This "entitlement" would be aligned with what is described as in the *Starting Better Report* [ix], with the entitlement referred to as a "Guarantee for Young Children and Families".

It would include:

- universal and free access to maternal and child healthcare
- high-quality, universally accessible ECEC [x]
- two years of preschool in the years before school
- more generous paid parental leave with better flexibility.

This is consistent with the Commission's recommendation that all children aged 0-5 have access to 30 hours or three days a week of quality ECEC.

The Commission's final report should:

- **recommend that ECEC is part of a broader early childhood development system**
- **explicitly describe a long-term vision for the ECEC system**
- **recommend that ECEC should be the "backbone" of a broader early childhood development system.**



2.2 Provide strong public management of the ECEC system

Minderoo supports the Commission's recommendation to federal, state and territory governments of the need for strong public sector management ("stewardship") of the ECEC sector. The Commission has made clear that to create an affordable, accessible, high-quality universal ECEC system, governments need to take responsibility for the system and the outcomes it achieves.

Agreeing the necessary roles and responsibilities between levels of government is a vital early step to developing a new ECEC system. Developing a new national approach is an opportunity to align system objectives and approaches to funding, delivery and regulation.

"Stewardship" is defined by the Commission as "coordinating" [xi], but it can also be interpreted as "guiding" or "regulating" rather than "leading". The Commission states: "A stewardship model – where the Australian, state and territory governments better coordinate their roles in the ECEC system and share accountability for sector outcomes – can address some of the challenges observed in the market, support a more cohesive policy response, and steer the sector towards universal access [xii]."

We recommend that the definition of "stewardship" be strengthened to strong public management of the ECEC sector. This will be required if the objective of universal, affordable ECEC is to be achieved.

Strong public sector management and intervention means taking responsibility for achieving government objectives, and supporting them to use their authority, resources and the full suite of policy levers (including funding, legislation, regulation, service delivery and education) to achieve designated objectives.

The report recommends clarifying roles and responsibilities across jurisdictions. It does not explicitly state that that governments are responsible for creating the ECEC system, and then providing active stewardship to ensure it delivers its intended outcomes. It includes oversight of the services delivered by for-profit, not-for-profit and public providers.

The report does not recommend any changes to the current system. However, in recommending supply-side funding of ECEC services into areas underserved by ECEC, this is effectively changing the ECEC system. This is welcomed and appropriate, implying that the role of government is to create, shape and manage the ECEC system. This legitimate role should be made more explicit in the final report.

The ACCC inquiry recognises the importance of strong public leadership. It states that "ultimately, the design of the government support model and regulatory measures will depend on the Australian Government's overarching policy objectives for the early childhood education and care sector, including appetite to take on a market stewardship role and the delineation of roles between the Australian Government and state and territory governments [xiii]". We agree.

The Commission's final report should:

- **recommend the federal, state and territory governments provide strong public management to create, shape and manage the ECEC system.**



2.3 Legislation is enacted by the federal, state and territory governments to establish an Early Childhood Commission

Minderoo agrees with the recommendation to establish a National Early Childhood Commission. As stated in the report, the federal, state and territory governments spend billions on ECEC, with little coordination. There are overlapping and unclear responsibilities between the federal, state and territories for ECEC, and currently, no effective body or mechanisms to integrate these shared responsibilities.

If the vision of universal ECEC is to be achieved, then the establishment of an Early Childhood Commission is vital. This would provide stewardship of the ECEC system, supporting coordination and alignment, particularly in the implementation of reforms to deliver universal access to ECEC.

We support Recommendation 9.1 in the report – for Australian Governments to improve policy coordination and implementation; with a new National Partnership Agreement (NPA) for [ECEC]; establishes an Early Childhood Commission, articulates the national vision for ECEC, and clarifies roles and responsibilities between all governments [xiv].

Importantly, the Early Childhood Commission would provide “stewardship” to ECEC that has been recommended now by the Commission, the ACCC Inquiry, the South Australia Royal Commission and in many other reports.

However, we recommend the final report provide more detail about the Early Childhood Commission and its establishment. We recommend that the Early Childhood Commission:

- have a broader remit than just ECEC, taking responsibility for stewardship of an Early Childhood Development system (as described above)
- have a clearly defined role, clearly articulating where this is different from the responsibilities of the federal, state and territory governments
- be established through legislation (not a National Partnership Agreed) passed by the federal, state and territory governments, to ensure the Early Childhood Commission has appropriate authority and resources to fulfill its role, completes its functions in a timely manner, and is sustainable into the future
- has an explicit remit to assist governments to work together on key areas such as funding arrangements, planning for the provision of early childhood services in all communities, improving the quality-of-service delivery, and coordinating workforce quality and supply
- is the body that has responsibility for implementing the recommendations made by the Early Childhood Commission that are accepted by the federal government, and subsequently state and territory governments.

We have also recommended in Information Request 9.2 (see page 26 of this submission) that prior to establishing an Early Childhood Commission, the Australian Government create a Commonwealth Taskforce in 2024-25. The taskforce would consist of the relevant federal ministers and agencies to create the framework and scope for the establishment of the Early Childhood Commission and liaise with states and territory governments if required.



Minderoo agrees that a pathway to better coordination between the federal, state and territory governments (including the establishment of an Early Childhood Commission) is initially signing a National Partnership Agreement for 3- and 4-year-old preschool, and a comprehensive agreement on ECEC that would establish the Commission and other recommendations from the inquiry.

The Commission's final report should recommend the Australian Government:

- **establish a taskforce to create a framework and scope for the Early Childhood Commission**
- **enact legislation through the federal, state and territory governments to establish an Early Childhood Commission.**

2.4 Provide a detailed pathway to achieving universal access to ECEC

Minderoo supports the Commission describing key steps on a pathway to universal ECEC. This includes the report noting (logical or priority order):

- defining a universal ECEC
- addressing current barriers, including workforce, abolishing the Activity Test and addressing affordability for low-income families
- introducing CCS changes
- expanding supply-side funding options
- establishing an Early Childhood Commission
- completing a revised National Early Childhood Education and Care Agreement
- contemplating future changes to funding and delivery models.

However, given the complexity of the ECEC sector and the overlapping responsibilities between governments, we recommend that the final report (or another document given to governments) includes a detailed roadmap over the next 10 years that provides clear guidance on how future governments can achieve universal ECEC. The report already recommends many of the key actions in a roadmap.

Sequencing them, describing them in more detail and making clear how they relate to each other would enhance the final report.

An overview of a sample roadmap is provided in Diagram 1 below (noting that the Inquiry would complete a much more detailed and explicit roadmap than the sample below [xv]). This roadmap provides an example of “staging” the major reforms that will be required to deliver universal ECEC.

Stage 1 addresses issues that are impeding the current ECEC system (addressing workforce challenges, removing the Activity Test and improving access for low-income families). It allows for the Australian Government to consider recommendations and engage with states and territories.

Stage 2 completes agreements between the federal, state and territory governments commencing with a 3-4-year-old preschool reform agreement, starts to implement a supply-side funding model in areas of



undersupply, while establishing an Early Childhood Commission to support government establishing a new ECEC system.

Stage 3 starts to build the reformed system. Legislation is passed by all governments, and critical infrastructure, such as an independent pricing authority, is established. Supply-side funding models are rolled out further.

Stage 4 sees a full child-centred supply-side funding model rolled out in communities underserved by ECEC.

The timing of initiatives in the roadmap fit with the Commission priorities of laying the foundation for long-term reform, while providing better access immediately for children from low-income families.

The Commission's final report should:

- **provide a detailed roadmap to universal access to ECEC.**



DIAGRAM 1. A ROADMAP TO UNIVERSAL ECEC (EXAMPLE)

	2024	BY 2025	BY 2029	BY 2034
Governance And Coordination Reform	Establish Commonwealth Reform Taskforce. Set a Vision – National Early Years Strategy	Establish Early Childhood Commission Early Childhood Education and Care Reform Agreement. National Partnership for 3- and 4-year-old preschool.	New Legislation – National Early childhood system defining Universal Access. Expand National Reform Agreement to include 0–3-year-olds	
Funding Reform	Design supply-side funding options for under-served communities.	Commence rollout of supply-side funding in areas <ul style="list-style-type: none"> • Outer metro, • Aboriginal Community Controlled Organisations (ACCOs). 	Price regulation authority supply-side funding in areas <ul style="list-style-type: none"> • Outer metro • Regional 	Supply-side funding in areas <ul style="list-style-type: none"> • Outer metro • ACCOs.
Workforce Reform	Pay rise for ECEC workers. National Workforce Strategy	Implement National Workforce Strategy	Standardise National Qualifications. Embed workforce attraction, teaching, standards, and career pathways into funding model.	
CCS Subsidy Reform	100% subsidy for low-income families	Introduce fee transparency initiatives. Modify CCS so all families access 30 hours. Amend inclusion funding.	Tougher regulations – quality and price.	
Integration		New supply-side services to be integrated services	Roll-out new supply-side ECEC as integrated child and family centre’s (ICFC’s) (e.g. new supply-side services) including extended hours.	
Inclusion	Abolish Activity Test			
Quality		Review of National Quality Framework (NQF) Tougher regulations – price and quality	Link CCS funding to quality. Incentivise quality in approval of new ECEC services.	



2.5 Establish a child-centered, supply-side, fixed-fee funding model (such as the \$10-a-day model used in Canada) in parallel to the CCS-funded funding approach, to address the undersupply of ECEC in outer metropolitan, rural and remote areas

As the Commission understands, the first five years of a child's life are critical. There is an overwhelming body of research that shows these early years are the best opportunity to make a positive difference in the lives of children, leading to better health, education and long-term wellbeing for every child, while improving economic outcomes and social cohesion for the Australian community.

The Australian Government understands the importance of the early years. The Prime Minister has committed to creating a universal ECEC system to make early learning and childcare accessible for all Australian children and their families.

However, what we know from the report and the ACCC's Final Report is that ECEC in Australia is neither affordable nor available to all Australian children and families.

There are far too many areas in Australia where ECEC is hard to access or cannot be accessed at all. This limits the ability of many Australian families to fully participate in the workforce (particularly women) and affects the development of their children. If the Prime Minister is to achieve his vision for a universal ECEC system, then he will require a pathway to change the way ECEC is funded and delivered.

The report suggests several immediate changes the government could make to assist families with cost-of-living relief (such as removing or adjusting the need for an activity test to access CCS). These are important short-term measures that will assist Australian families with current accessibility and affordability issues. However, if we are to create a universally accessible system for all Australians, then the current system needs a long-term roadmap for reform.

We endorse the Commission's recommendation that the government support the supply of ECEC in persistently "thin markets" by supply-side funding [xvi]. We welcome the draft findings and recommendations on separate funding approaches for "thin markets" to support ongoing service sustainability, and the establishment of new services where the market doesn't meet need.

Recommendation 5.1 in the report provides examples of supply-side funding options. Grant funding, block grants and specific arrangements for Aboriginal Community-Controlled Organisations are contemplated, and the report explores potential solutions for situations where ECEC availability is poor [xvii].

The ACCC inquiry supports further consideration of supply-side subsidies (Recommendation 8). It recommends that different types of markets (communities) will require a different mix of government interventions (including supply-side funding of services in adequately served markets, underserved markets [most often outer metro and larger towns in regional areas], and unserved markets).



While the report examines the Community Child Care Fund (CCF), it lacks an in-depth analysis of long-term models for supply-side funding. Such analysis could offer the government detailed options for delivering ECEC in underserved or unserved communities.

The Thrive by Five campaign has advocated for a fixed fee, supply-side funded model to be implemented in communities where there is no supply or an undersupply of ECEC. An example of how an affordable model could be implemented in Australia is outlined below.

Case Study 1: An affordable pathway to universal ECEC

The current market dynamics of our ECEC system means that those with the highest capacity to pay are being provided with the highest quality services. The ACCC's Final Report shows that providers' supply decisions are highly influenced by expectations of profitability within a particular area or market, which is driven by expectations of demand and ability to pay [xviii].

Essentially our reliance on market forces to manage price means access to affordable and accessible childcare is determined by where you live and your ability to pay for it. The Mitchell Institute's report *Deserts and oases: How accessible is childcare in Australia* [xix] (Mitchell Institute Report) shows that there are concerning correlations between access to childcare and socio-economic status and that the more advantaged areas have the fewest number of people living in a childcare desert.

Given this, the current market mechanism model is an unsuitable model for a childcare system, and a parallel national system to provide ECEC in "thin markets" must be created that has strong public management controls and prioritises universal access, affordability and quality – not profit.

Inspired by a successful model being implemented in Canada (see below), we have modelled an example of a supply-side funding system that could be implemented in Australia over 10 years that would initially sit in parallel to the current CCS system.

The program works by the government purchasing fixed-fee places at a "set" daily rate per child per day. The providers are then only permitted to charge an additional set amount (e.g. \$10 a day) to families.

Case Study 2: The Canadian experience

As the Commission is aware, the "fixed fee" e.g. (\$10 a day) model for funding ECEC has been operating successfully in Canada and countries such as Norway. In 1997, the Québec Government implemented its Québec Educational Childcare Act in 1997 as part of its Family Policy, which included a new "fixed fee" CA\$5 a day childcare program, offering access to affordable childcare to families at all levels of income.

The ECEC service provider was permitted to only charge a fixed fee (initially \$5 a day in Quebec) to parents, effectively a "price cap" on the fees that ECEC providers could charge. This system operated in parallel with the existing "tax credit"-funded model that operates in Canada (government subsidised, like Australia's CCS funding model, a "demand"-side ECEC model where government funding [or a tax credit] is provided direct to parents, who then purchase the childcare place).



When the Quebec provincial government tried to redesign/dismantle the system in 2003, this was met with major opposition from parents, so instead it kept the fixed-fee system and increased it to \$7 a day [xx] and then increased it to \$8.50 in 2021. The National Government then rolled out the model across Canada with a set fixed fee of **\$10 a day**.

Concerns have been raised that the model was not distributed evenly across all income levels, with many services delivering the fixed fee model in middle-and high-income areas. We recommend that in Australia a child-centred, fixed-fee model is targeted to communities that currently do not have an adequate supply of ECEC.

A key takeaway from Quebec's experience is that fixed-fee ECEC must be adequately funded, and quality needs to be prioritised and incentivised for it to be effective at delivering high-quality universal ECEC. This includes providing adequate wages for early education carers and teachers to ensure we attract and retain a qualified workforce, as outlined in comments to draft recommendation 3.7.

The Quebec fixed-fee model was successful in improving availability and attendance and proved extremely popular with parents [xxi]. Below we show an example of how it could be delivered in Australia.

Case Study 3: An example: How could a fixed-fee \$10-a-day childcare system be implemented in Australia?

\$10 a day capped ECEC fees to families living in areas underserved, or unserved by ECEC.

We have calculated what it would cost to rollout a \$10-a-day model to address ECEC in areas underserved, or unserved by ECEC. It is targeted, affordable and achievable for government. The implementation of this policy would deliver \$10 a day capped ECEC fees to families living in unserved and underserved markets and would be rolled out across 52 demographic locations, creating 270 new childcare centres.

The merits of a fixed fee (\$10 a day) model for ECEC have been considered by ECEC stakeholders in Australia previously. The Centre for Policy Development stated that the Canadian example shows the simplicity and reliability that a fixed-fee system can provide [xxii].

A targeted supply-side funding model could have many benefits for Australian families. It would:

- deliver access to childcare in areas that were previously unserved or underserved.
- make childcare more affordable and providing cost-of-living relief to families
- help many parents (particularly women) take on extra shifts and / or return to work sooner.

A targeted \$10 a day supply-side funding model is an affordable pathway for the government to deliver universal ECEC and would see 24,300 additional childcare places coming online in currently underserved or unserved markets.



The economics of a targeted \$10 a day supply-side funding model will be explored in the next section below.

Quick policy facts

What? 270 centres delivered, or 24,300 additional childcare places created
Where: In 52 demographic areas identified as “childcare deserts” across Australia
When: Staggered roll out over 10 years beginning in 2025
Cost: Recurrent - \$3.5 million per centre per year in CCS subsidy funding
Capital - \$2.1b in capital costs over 10 years*

Note: capital delivery options could include full government build, a mix of current available school sites, a Public-Private Partnership (PPP) model and philanthropic investment.

The model

Targeted locations – childcare deserts

The Mitchell Institute Report estimates that about nine million Australians, 35 per cent of the population, live in neighbourhoods they classify as a childcare desert. They define a childcare desert as a populated area where there are more than three children per childcare place, or less than 0.333 places per child aged four and under [xxiii].

According to this report, childcare deserts may mean a total absence of services in rural and regional areas – with about 1.1 million Australians living in regional and remote areas where there is no childcare available at all [xxiv]. This means families may need to travel a lot further to access childcare, or some may not be able to access care at all.

Based on data and parameters from the Mitchell Institute Report [xxv], we have identified 52 demographic locations that fall within the report’s definition of a childcare desert. Of these locations, 30 were in rural and remote locations, 16 in outer metropolitan locations and six in inner metropolitan locations.

Based on the parameters used by the Mitchell Institute Report, to provide universal access we have calculated that the 52 demographic areas would require an additional 270 child care centres.

The delivery over 10 years

The creation of 270 childcare centres could be staggered over 10 years. The capital cost to build them could come from a range of funding options, including full government build, a mix of current available school sites, a Public-Private Partnership (PPP) model and/or philanthropic investment. An example of a delivery timeline of the 270 centres over 10 years is outlined below.



Table 1.

Financial Year	Number centres opened per year	Total number of active centres
2025-26	15	15
2026-27	20	35
2027-28	20	55
2028-29	25	80
2029-30	25	105
2020-31	25	130
2031-32	35	165
2032-33	35	200
2033-34	35	235
2034-35	35	270

Cost

We believe this targeted approach and staggered delivery over 10 years could be an affordable option for the government if it wants to progress toward a universal ECEC system.

To deliver this model, we estimate it will cost a maximum yearly CCS subsidy of **\$3.5 million per centre**.

This is based on a maximum subsidy of \$14.73 an hour, a day being equivalent to 10 hours and a centre having a maximum of 90 children per day for a five-day week.

This means the CCS subsidy for 270 centres (24,300 children) across 10 years would cost around **\$4.5 billion** (see tables 2 and 3 in Appendix 1).

In regard to capital cost, we estimate building 270 centres would cost around \$2.1 billion over 10 years should the government deliver and fund all centres (see tables 2 and 3 in Appendix 1).

We believe a long-term supply-side funding model (such as the example above) must be created to assist the Australian Government in implementing its vision of universal ECEC for all Australians. The government has a once-in-a-generation chance for reform, and we urge the Commission to provide a roadmap to help the government achieve it.

The Commission's final report should:

- provide a detailed analysis of the costs and benefits of introducing a supply-side funding model with a price cap, such as the \$10-a-day model, in areas that are currently underserved or unserved by ECEC providers (Childcare Deserts), and for the policy to be rolled out over a 10-year period
- provide comprehensive supply-side funding options to the government, outlining a roadmap towards establishing a universal ECEC system
- ensure that the recommendations of supply-side funding be in addition to the short-term measures that will deliver immediate cost-of-living relief to Australian families, such as abolishing the activity test and increasing the CSS to 100 per cent for low-income families.



3. Responses to the recommendations in the report

DRAFT RECOMMENDATION 5.1	SUPPORT UNIVERSAL ACCESS IN PERSISTENTLY THIN MARKETS VIA SUPPLY- SIDE FUNDING	STRONGLY SUPPORT
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COMMENT

Refer to section 2.5 above.

DRAFT RECOMMENDATION 3.1	REDUCE BARRIERS TO EDUCATOR UPSKILLING	SUPPORT
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COMMENT

Minderoo supports all recommendations to enhance the ECEC workforce.

It is noted that the Victorian Government, as part of its preschool reforms, actively planned to build capacity in the preschool workforce, including actions to reduce barriers to upskilling. There is evidence that the unintended positive consequence of the workforce development reforms has been the lifting of capacity in the ECEC sector more broadly.

For instance, Victoria has a much lower percentage of ECEC services that cannot attract suitable qualified staff than the national average (2.1 per cent compared to 12.8 per cent), demonstrating that they have fewer workforce shortages in the ECEC sector than other jurisdictions.

The Commission's final report should:

- explore the link between Victoria's initiatives to build the capacity of the ECEC workforce and workforce supply and capacity.

DRAFT RECOMMENDATION 3.5	IMPROVE PATHWAYS AND SUPPORT FOR ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLE TO OBTAIN ECEC QUALIFICATIONS	SUPPORT
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COMMENT

We support the recommendation that says specific arrangements [to deliver ECEC] for ACCOs should be co-designed with Aboriginal and Torres Strait Islander communities.



We endorse calls by the Secretariat of National Aboriginal and Islander Childcare’s recommendation for Aboriginal and Torres Strait Islander peoples to design, manage and deliver integrated early years services in their communities.

The effective operations of integrated early years services require staffing by skilled Aboriginal and Torres Strait Islander people.

The Commission’s final report should:

- **Recommend Initiatives, which are part of the National Workforce Strategy, be supported and adequately resourced by all governments. (Recommendation 3.7)**

DRAFT RECOMMENDATION 3.6	CONTRIBUTE TO PROFESSIONAL DEVELOPMENT FOR THE ECEC WORKFORCE	SUPPORT
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COMMENT

Refer to section 3.1.

DRAFT RECOMMENDATION 3.7	IMPROVE THE ECEC WORKFORCE STRATEGY	SUPPORT
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COMMENT

The delivery of high-quality ECEC places is dependent on the availability of a high-quality, well-resourced ECEC workforce. However, as noted in the report, the ECEC workforce is in crisis. This is demonstrated by:

- an average 12 per cent of services operating with a staffing waiver (meaning they cannot access suitably qualified staff) [xxvi]
- job vacancies doubling since 2019 and are now at a record 10,000 vacancies
- providers reporting significant challenges recruiting and retaining staff, to the point of rooms closing and restrictions placed on enrolling new children [xxvii].

The labour shortages affecting the entire early childhood sector are most pronounced in low-income, rural and remote communities, where many services struggle to meet demand and quality standards.

We urge the Commission to include a recommendation in its final report that requests the Australian Government provide additional funding to the ECEC sector to substantially increase educator wages (if this has not occurred in the 2024/25 budget).

We suggest the recommendation include a request that any increase to the sector be delivered in a way that guarantees any additional funding solely be used for increases in wages, and that childcare fees are monitored to prevent any flow on costs to Australian families.



Further to an increase in ECEC wages, we believe that the proposed ECEC Commission overlook the implementation of a workforce strategy and that the ECEC Commission be given the capacity and powers to look at and implement that strategy across federal, state and territory boundaries.

We also urge the Commission to include additional recommendations that specifically address how the government can increase workforce participation, particularly of women, and that further weight be given to this issue in the final report.

The Commission's final report should:

- recommend the Australian Government provide additional funding to the ECEC sector to substantially increase educator wages (if this has not occurred in the 2024/25 budget)
- recommend the Australian Government ensure any increase in CCS, or direct funding to ECEC providers, be delivered in a way that guarantees any additional funding solely be used for increased wages, and that childcare fees are monitored
- provide detailed advice on increasing the workforce participation of women.

DRAFT RECOMMENDATION 6.2	MODIFY THE CHILD CARE SUBSIDY TO IMPROVE AFFORDABILITY AND ACCESS	SUPPORT (QUALIFIED)
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COMMENT

Note: We have recommended that a child-centred, supply-side, fixed-fee funding model is implemented in parallel to the CCS-funded funding approach, to address the undersupply of ECEC in outer metropolitan, rural and remote communities underserved with ECEC. Therefore, while we support the modification of the CCS to improve affordability, we qualify this support in noting that we recommend that an alternative funding model to the provision of CCS (demand side) should be implemented in many communities.

We support this recommendation.

In 2022, for an Australian couple on average wages with two children in centre-based day care full-time, net childcare costs came to 16 per cent of net household income. In contrast, the average for OECD countries was 9 per cent, with Australia ranked 26th out of 32 countries [xxviii].

Of further concern, our current ECEC system disproportionately impacts those that can least afford it. Low socio-economic families spend a higher proportion of their income on ECEC [xxix], preventing them from fully participating in the workforce, which would boost their capacity to provide for their children and address critical workforce shortages.

Reduced access to affordable ECEC has a particular impact on women's workforce participation. When affordable and accessible ECEC places are not available, then parents, most often women, have little option but to stay at home. In February 2021, almost 140,000 people in Australia who wanted paid employment cited "childcare" as the main reason they couldn't look for work – nine out of ten were women [xxx].



We draw the Commission's attention to the release of the Australian Bureau of Statistics report *Barriers and Incentives to Labour Force Participation, Australia*, which looks at factors that influence how people participate in the labour market and the hours they work [xxxix]. It found that 28 per cent of mothers who indicated childcare was the main reason they were unavailable for work, said the reason was that childcare was not available, booked out, or not in their locality.

Interestingly, this is similar to the percentage of mothers who indicated they preferred to stay home and look after their children (30 per cent) as the reason they did not want to work or work more hours. This shows that almost 50 per cent of mothers with childcare responsibilities who don't work, or could work more hours, would work if childcare was more accessible. This data counters claims that most women only work part-time because they prefer to stay home with children. This may counter arguments that most women who don't work for childcare reasons prefer to stay at home, rather than not working because of the unavailability of ECEC [Draft Finding 4.3].

Given the cost-of-living pressures facing Australian families, we believe that short-term measures be introduced (as suggested in the Commission's report) that will give immediate relief for low-income families and allow them to participate further in the workforce – particularly women. These measures should be implemented while planning for the rollout of the long-term reform to guarantee universal access such as a supply-side funding model as suggested in recommendation

We agree with the following findings in the report:

- Ensuring all children aged 0–5 years have access to some form of affordable ECEC for three days a week [xxxix].
- The Australian Government should raise the maximum rate of the Child Care Subsidy (CCS) to 100 per cent of the hourly rate cap for families on incomes up to \$80,000 (which is about 30 per cent of all families with young children) [xxxix].

We suggest that the Commission's final report recommend that the Australian Government **raise the maximum rate of the Child Care Subsidy (CCS) for three days a week to 100 per cent of the hourly rate cap for families on incomes \$80,000 or below.**

Abolish the Activity Test

The Commission found that the government's activity test creates a barrier to participation for some children. It is unclear if the requirement that parents or guardians engage in activities like work or training to access subsidised ECEC has had any effect on labour force participation. It also found that relaxing the activity test for all families and lifting subsidies for low-income families would target support to children and families who would benefit the most.

We agree with the Commission that the current activity test to access the CCS is a barrier, particularly for low-income families. However, rather than simply modifying the test, we suggest the Commission recommends abolishing it entirely.



Given the financial challenges facing (particularly) low-income families, we believe that abolishing the test is one of the most effective ways to improve access to ECEC and offer immediate cost-of-living relief.

While the Activity Test was originally designed to encourage participation in the workforce, as we have seen, it often does the opposite. The Commission's own draft findings and Impact Economics and Policy reports found that the Activity Test is:

- **Complex and confusing:** This makes it difficult for parents to accurately estimate their subsidy entitlements.
- **Increases debt potential:** Many families are concerned about a potential CCS debt if they incorrectly report their activity hours and choose not to send their children to ECEC rather than make a mistake and incur a debt.
- **Disproportionately affects low-income families:** The ACCC Inquiry found that households with the lowest entitlements to subsidised hours of care had the lowest median incomes, around \$46,000 per year. Those households also used the most unsubsidised hours of childcare – more than seven hours per week on average [xxxiv].

Abolishing the Activity Test would have a range of social and economic benefits:

- **Increase workforce participation, particularly for women:** Abolishing the Activity Test will allow more families to use more subsidised ECEC, which would support labour force participation. This change would lead to an estimated 1.2 per cent increase in total hours worked – the equivalent of 7,300 full-time employees [xxxv]. Further, abolishing the Activity Test could increase female participation by up to 39,620 employees and deliver economic benefits of \$4.5 billion per year [xxxvi].
- **Increase ECEC access for children from disadvantaged families:** Each year around 300,000 children are born in Australia, yet one in five of these children start school developmentally vulnerable [xxxvii]. Evidence shows that these children most often never catch up and face a lifetime of consequences due to a policy that limits a child's access to early childhood education based on parental activity [xxxviii]. Abolishing the Activity Test would remove a significant barrier to vulnerable children accessing ECEC, improving their educational and developmental outcomes [xxxix].

Rather than enhancing economic inclusion, the requirement for an activity test is creating a roadblock for low-income families to participate in the workforce and damaging the education and development of Australian children. For any government motivated to reduce disadvantage, improve educational outcomes and ensure children get the best start in life, abolishing the Activity Test is an essential place to start and we encourage the Commission to include this recommendation in its final report.

The Commission's final report should:

- **recommend raising the maximum rate of the CCS for three days a week to 100 per cent of the hourly rate cap for families on incomes \$80,000 or below.**
- **recommend abolishing the Activity Test.**



DRAFT RECOMMENDATION 6.1	MONITOR RISES IN FEES AND OUT-OF-POCKET EXPENSES	SUPPORT
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COMMENT

Refer to section 2.3.

DRAFT RECOMMENDATION 2.2	AMEND THE DISABILITY STANDARDS FOR EDUCATION	SUPPORT
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COMMENT

Note: The Review of the National Disability Insurance Scheme (NDIS) highlights the importance of early intervention, and the key role early childhood education could play in fast-tracking access to crucial, tailored support for children with disability. It recommends a shift to greater state-based provision of support services, delivered through “foundational supports” in government settings, such as in schools and childcare, where appropriate. Specifically, it outlines the following actions to create opportunities for children of all backgrounds to reach their full potential:

- *National Cabinet should agree to jointly invest in early supports for children with emerging development concerns and disability... closely linked to and integrated with mainstream services, particularly education and early childhood services.*
- *All Australian governments should take steps to protect the right to inclusive education for children with disability and developmental concerns in early childhood education and care and schools.*

The NDIS review points to the potential of early childhood education as a tool that – with appropriate planning and investment – could not only connect children with disability to the support they need earlier on, but also reduce some of the financial load of the scheme.

These findings indicate that the federal, state and territory governments will be relying on the ECEC sector to fulfill the role of a “foundational support” and become the primary publicly funded support for many children with a disability or neurodiverse profile. This highlights the importance of meeting the government’s objective of an affordable, accessible, equitable and high-quality ECEC that reduces barriers to workforce participation and supports children’s learning and development. [x1]

Minderoo supports the recommendation to amend as soon as practicable the Disability Standards for Education 2005, which clarify the obligations of providers to ensure that students with disability can access and participate in education on the same basis as students without disability.



DRAFT RECOMMENDATION 7.1	ENSURE INTEGRATED SERVICES ARE AVAILABLE WHEN NEEDED	SUPPORT
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COMMENT

Note: Other recommendations in the report (e.g. new federal, state/territory Agreement on Early Childhood and Care; the need for system stewardship, establishment of an Early Childhood Commission) are required to facilitate the integration of early childhood services which are provided by different levels of government.

Second, we have recommended (section 2.1 above) that ECEC be integrated as part of a broader “early childhood development system”. The rationale for this recommendation is to ensure that all early childhood services and supports are integrated in a wholistic manner.

We strongly support this recommendation.

As noted in the report, “there is little coordination in the setting of ECEC policy, and a multitude of different programs with overlapping objectives. Integrated services can make a real difference, in particular for Aboriginal and Torres Strait Islander children and families.

These services juggle multiple funding streams to continue operating and their integration function – a key support for children and families – is often unfunded” [xli]. It adds: “There are many initiatives to integrate services across Australia being implemented by both the federal and state and territory governments.”

The importance of integrated services was shown in the recommendations of the SA Royal Commission, including [xlii]:

“That the State Government promotes a vision of place-based, responsive and connected service delivery in the early years. This should include:

- creating regular opportunities for connection (‘the glue’) between different service providers working with families with young children in local areas, leveraging the local teams for implementing three-year-old preschool
- making integrated services the default for all newly established State Government early years services, including preschools and schools, community health, parent and infant mental health and parenting supports.

The Commission’s final report should:

- **make detailed recommendations to ensure integrated services are available when needed and consider the requirement for publicly funded early childhood infrastructure for ECEC to enable them to accommodate other early child and family services.**



DRAFT RECOMMENDATION 7.2	SUPPORT CONNECTIONS BETWEEN ECEC AND CHILD AND FAMILY SERVICES	SUPPORT
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COMMENT

Refer to comments for 7.1.

DRAFT RECOMMENDATION 7.6	SUPPORT OUT OF PRESCHOOL HOURS ECEC	SUPPORT IN PRINCIPLE
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COMMENT

We support the integration of outside school hours care (OSHC) into other early childhood services, including ECEC, particularly if these are located on or near school sites.

DRAFT RECOMMENDATION 8.2	A NEW REVIEW OF THE NATIONAL QUALITY STANDARD	SUPPORT IN PRINCIPLE
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COMMENT

Minderoo’s Thrive By Five campaign has noted recent research of the poor quality of food provision in ECEC settings [xlili]. While it is noted that the ECEC services are not required to provide food to children, many do.

This research suggests young children are going hungry in early childhood centres, being given food that doesn’t meet dietary standards, and childcare workers are giving children their own food. The researchers contend that these food issues are linked to conflict and emotional issues across the day.

Minderoo requests that the Commission in its final Report recommends that food quality (healthy, meeting dietary guidelines) is explicitly included in revised quality standards for ECEC settings.

DRAFT RECOMMENDATION 8.4	INCENTIVISE QUALITY PROVISION IN NEW ECEC SERVICES	SUPPORT IN PRINCIPLE
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COMMENT

We support measures to improve quality of ECEC services, and we note the Commission’s recommendation that state and territory regulatory authorities should be required to consider the



performance of a provider's existing services when making decisions on an application to approve new services.

DRAFT RECOMMENDATION 9.1	IMRPOVE POLICY COORDINATION AND IMPLEMENTATION	SUPPORT
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COMMENT

We strongly support this recommendation.

Refer to section 2.2, 2.3 and 2.4 above.

DRAFT RECOMMENDATION 9.2	ESTABLISH AN ECEC COMMISSION	SUPPORT
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COMMENT

We strongly support this recommendation.

Refer to section 2.2, 2.3 above and information request 9.2 below.

4. Responses to information requests in the report

INFORMATION REQUEST 6.1	6.1 Potential modifications to the activity test
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Refer to comment at recommendation 6.2 above.

INFORMATION REQUEST 9.2	AN ECEC COMMISSION
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RESPONSE

The Prime Minister has committed to creating a universal ECEC system. However, the report and the ACCC Inquiry have highlighted that our current ECEC system needs significant reform if the vision of universal access is to be realised.

As a priority, the Australian Government must take steps to address affordability and availability gaps for those least able to afford ECEC or who can only access few, if any, services. The government should also improve support for ECEC services to ensure that ECEC is inclusive, flexible and well-coordinated to help relieve the cost-of-living pressures [xliv].

Despite the urgent need for reform, there is currently no single body that exists that has clear accountability for addressing affordability and supply gaps, with responsibilities for ECEC funding and



provision. With responsibility for ECEC shared between the federal, state and territory governments, there needs to be a high level of coordination to achieve universal access to ECEC.

The Commission has recommended an independent body, such as an Early Childhood Commission, be established to take on the leadership role of ECEC reform and deliver a universal ECEC system – and Minderoo agrees with this recommendation.

Prior to establishing an Early Childhood Commission, we recommend that the Australian Government create a Commonwealth Taskforce in 2024-25 that consists of the relevant federal ministers and agencies to create the framework and scope for the establishment of the Commission and liaise with states and territory governments if required.

Once established, an Early Childhood Commission would have a leadership role in delivering the supported recommendations of the Commission and ACCC Inquiry and develop a reform roadmap that can then be shared with state and territory governments and other stakeholders, such as service providers, business, unions and the community.

As recommended in the report, in expanding access to ECEC, the Australian Government should also create appropriate mechanisms to ensure the quality of non-regulated services receiving direct Australian Government funding.

For Aboriginal and Torres Strait Islander services out-of-scope of the National Quality Framework, governments should undertake a process of joint decision-making with Aboriginal and Torres Strait Islander services, communities and peak bodies to design an appropriate regulatory framework [xliv].

Children, families, governments and the broader Australian community have much to gain from reforming our early childhood system.

Structure of the Commission

The Early Childhood Commission should be designed to provide a unified and comprehensive approach to early childhood development, aligning with the objectives outlined in the Centre for Policy Development's *Starting Better* report [xlvi].

The proposed commission could be structured as a national body responsible for the governance and stewardship of the universal early childhood development system. Its structure should include representatives from federal, state and territory governments, and bodies that represents the interests of Aboriginal and Torres Strait Islander peoples, culturally and linguistically diverse persons, and interests of persons with a disability.

Scope and function

The commission should be responsible for stewardship (governance) and being accountable for working with the federal, state and territory governments to deliver the vision for a universal, high-quality, early child development system and entitlement for all Australian young children and families.



The Commission's final report should:

- recommend the creation of a Commonwealth Taskforce that can establish an Independent Early Childhood Commission and implement the recommendations from the ACCC Inquiry and the Commission's inquiries.



Appendix 1

Table 1. - \$10 A DAY DELIVERY OVER 10 YEARS

Financial Year	Number of new centres opened	Total Numbers of centres operating	Suggested Location rollout
2025-2026	15	15	Outer Metro & Very Remote
2026-2027	20	35	Outer Metro & Very Remote
2027-2028	20	55	Outer Metro & Very Remote
2028-2029	25	80	Outer Metro & Regional
2029-2030	25	105	Outer Metro & Regional
2030-2031	25	130	Outer Metro & Regional
2031-2032	35	165	Outer Metro, Inner Metro, Regional
2032-2033	35	200	Outer Metro, Inner Metro, Regional
2033-2034	35	235	Outer Metro & Regional
2034-2035	35	270	Outer Metro & Very Remote

FINANCIAL SUMMARY TABLES

Table 2. - Years 2025 – 2030*

	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	Total
Capital	\$120,000,000	\$160,000,000	\$160,000,000	\$200,000,000	\$200,000,000	\$840,000,000
Recurrent	\$51,702,300	\$120,638,700	\$189,575,100	\$275,745,600	\$361,916,100	\$999,577,800

Table 3. - Years 2030 – 2035*

	2030-2031	2031-2032	2032-2033	2033-2034	2034-2035	Total
Capital	\$200,000,00	\$280,000,00	\$280,000,00	\$280,000,00	\$280,000,00	\$1,320,000,00
Recurrent	\$448,086,600	\$568,725,300	\$689,364,000	\$810,002,700	\$930,641,400	\$3,446,820,00
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*Note figures have not been adjusted by CPI across the forward estimates.



Endnotes

- i Australian Competition and Consumer Commission. Childcare Inquiry. Interim Report. September 2023.
- ii Australian Competition and Consumer Commission. Childcare Inquiry. Final Report. January 2024.
- iii The South Australian Royal Commission into Early Childhood Education and Care, “Royal Commission into early childhood education and care report” 2023.
- iv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (iv).
- v Independent Pricing and Regulatory Tribunal NSW, “Early childhood education and care affordability, accessibility and consumer choice” 2022-2023.
https://www.ipart.nsw.gov.au/Home/Industries/Other/Reviews/Early_childhood_education_and_care_affordability%2C_accessibility_and_consumer_choice?jhsjds
- vi Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (3).
- vii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (iv).
- viii The South Australian Royal Commission into Early Childhood Education and Care, “Royal Commission into early childhood education and care report” 2023.
- ix Centre For Policy Development 2021, “Starting Better. A Guarantee for Children and Young Families’ Report”.
- x ECEC encompasses childcare (long day care, family day care, out-of-school hours care) and preschool.
- xi Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (54).
- xii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (54).
- xiii Australian Competition and Consumer Commission. Childcare Inquiry. Interim Report. September 2023 (43).
- xiv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023.
- xv We are aware that the Centre for Policy Development will submit a more detailed roadmap in their submission.
- xvi Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (349).
- xvii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (342).
- xviii Australian Competition and Consumer Commission. Childcare Inquiry. Final Report. January 2024 (19).
- xix Hurley, P., Matthews, H., & Pennicuik, S, “Deserts and oases: How accessible is childcare?” Mitchell Institute, Victoria University 2022 (7).
- xx Jane Jenson, *Rolling Out or Backtracking on Quebec’s Child Care System? Ideology Matters*, Public Policy For Women, University of Toronto Press 2009.
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- xxii Rachel Clun, ‘How \$10-a-day childcare became reality in Canada – and what Australia can learn from it’ (2 July 2023). <https://www.smh.com.au/politics/federal/why-australia-should-look-to-quebec-s-5-a-day-daycare-20230702-p5dl3q.html>
- xxiii Hurley, P., Matthews, H., & Pennicuik, S, “Deserts and oases: How accessible is childcare?” Mitchell Institute, Victoria University 2022 (18).



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- xxiv Hurley, P., Matthews, H., & Pennicuik, S, “Deserts and oases: How accessible is childcare?” Mitchell Institute, Victoria University 2022 (25).
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- xxvi Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (16).
- xxvii Australian Childcare Alliance Survey 2023. <https://childcarealliance.org.au/latestnews/aca-backs-sba-2>
- xxviii Australian Competition and Consumer Commission. Childcare Inquiry. Final Report. January 2024 (201).
- xxix Australian Competition and Consumer Commission. Childcare Inquiry. Interim Report. September 2023 (69).
- xxx Centre For Policy Development 2021, “Starting Better. A Guarantee for Children and Young Families’ Report”.
- xxxi Barriers and Incentives to Labour Force Participation, Australia (2022-2023).
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- xxxii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (2).
- xxxiii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (2).
- xxxiv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (38); Impact Economics and Policy. Potential Unrealised Activity Test Undermining Benefits of Universal Pre-School 2023; Impact Economics 2023. Child Care Subsidy Activity Test: Undermining Child Development And Parental Participation.
- xxxv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (38).
- xxxvi Women’s Economic Taskforce. A 10-Year Plan to Unleash the Full Capacity and Contribution of Women to the Australian Economy. 2022 <https://www.pmc.gov.au/sites/default/files/resource/download/womens-economic-equality-taskforce-final-report.pdf>
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- xxxviii Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (38)
- xxxix Impact Economics 2023. Potential Unrealised. Activity Test Undermining Benefits of Universal Preschool.
- xl Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (iv).
- xli Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (14).
- xlvi Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (14)
- xlvi Young kids failing to get adequate nutrition in early childcare centres, research suggests. ABC Report. 12 February 2024.
- xliv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (5).
- xliv Productivity Commission, “A path to universal early childhood education and care draft report”, 2023 (54).
- xlvi Centre For Policy Development 2021, “Starting Better. A Guarantee for Children and Young Families’ Report”.