



Productivity Inquiry Submission

The Front Project

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ABOUT THE FRONT PROJECT

The Front Project welcomes this opportunity to contribute to the Productivity Commission's Inquiry into Early Childhood Education and Care (ECEC).

The Front Project is an independent, national enterprise working to improve quality and create positive change in Australia's ECEC system. We work with government, business, and the early education sector to address disadvantage, improve outcomes for children and increase the short and long-term gains for Australia. We find innovative solutions that create impact in all parts of the system so that all children can thrive, regardless of the different challenges they experience.

We know high quality early education lays foundations for children that can last a lifetime, and at the same time provides significant benefits to our society and the future prosperity of Australia. Our society will see the full benefits of investment in the early years when the system is geared toward ensuring all children can access high quality education and take advantage of the opportunities this presents.

To realise our vision of addressing disadvantage by improving quality and access in Australia's early childhood education system, the Front Project applies a systems approach to our work. We carefully navigate the varied levels of the rich and complex ECEC system to positively impact the experiences and improve the outcomes of children. With many organisations and individuals holding diverse perspectives and 'moving parts' of the system, we work with the whole ECEC system - people inside the sector and those who intersect with it - to influence change across all levels.

What makes our approach unique compared to pure advocacy, research or policy work is how we consider the entire early education system to understand how it intersects with our broader society; learn where the best opportunities are to optimise outcomes; and find appropriate, feasible solutions that deliver the most benefits to children, families, employers and our economy. We view the current unacceptable levels of developmental vulnerability experienced by children in Australia as a complex social problem. This is because there is no simple solution to the issue, and it is possible to approach the issue from multiple, sometimes competing, perspectives, which may have multiple possible solutions.

CONTEXT

We welcome the Productivity Commission's inquiry into ECEC, considering options that improve or support:

- affordable, accessible, equitable and high-quality ECEC, including considering a universal 90 per cent childcare subsidy rate
- economic growth, including enabling workforce participation, especially for women
- learning and development outcomes, especially for children and families experiencing disadvantage

We note that this inquiry is taking place in the broader context of significant focus on early childhood wellbeing, education and development in States and Territories and at the Commonwealth level. Initiatives being led by the Australian Government include the development of a national vision for the early years, a whole-of-government Early Years

Strategy, the collaborative development of a long-term vision for ECEC by Education and Early Years Ministers and the ACCC Child Care Price Inquiry.

We applaud the efforts of the Australian government over the past year in addressing some of the systemic challenges existing for children and families, in accessing affordable and high quality ECEC. These include the increase in rates of Commonwealth Childcare Subsidy to 95 per cent and removing the annual cap become operational from 1 July 2023, provision of additional preschool funding through the Universal Access National Partnership (UANP) and the most recent budget announcements including funding for Early Childhood Educator Professional Development and the supporting the establishment of ECEC services in “childcare deserts.”

Australia’s productivity can be optimised by strengthening the ECEC sector and ensuring that quality ECEC is accessible and affordable for all Australia. There is strong evidence that high quality, affordable ECEC has significant benefits for children, parents, society and the Government - now and in the future.

In 2019 the Front Project commissioned PWC to examine the productivity benefits of investing in early education program for 15 hours per week, delivered by a Bachelor qualified teacher in the year before school. It showed there is a significant return on investment. For every dollar invested in early education, Australia receives \$2 back over a child’s life (The Front Project, 2019). While this modelling is based on the year before school, the report noted the return on investment will *increase* if Australia invests in offering two years of ECEC, increasing the quality of ECEC and ensuring all children, especially those from disadvantaged communities, have access to and participate in ECEC (The Front Project, 2019). Our 2019 modelling, based on just one year of ECEC, showed that quality ECEC:

- supports increased workforce participation by supporting parents and guardians to work an additional 33 million hours across the economy, which increases tax revenue by \$313m as well as boosting personal superannuation contributions
- supports children’s development, including increased levels of school achievement, which positively impacts their lifetime earnings and improves health outcomes
- offers considerable savings in health, education and justice - \$1,196m with just one year of ECEC (The Front Project, 2019)

We believe that the time is right for the Australian Government to capitalise on the opportunity offered by the sector-wide appetite for reform, ensuring Australia has a robust, equitable and affordable ECEC system that improves children’s outcomes, addresses disadvantage and supports workforce participation.

One of the most effective ways to enhance ECEC systems is for the government to facilitate the development and adoption of a system stewardship approach. This will create the systemic conditions to deliver the ECEC system of the future (The Front Project, 2022a). We acknowledge that the Draft National Vision for the Early Years includes System Stewardship as the key role for government, specifically:

Governments take a holistic approach as stewards of the ECEC system in partnership with the sector, shaping a system that is nationally coherent and connected and responsive to community needs and outcomes for families, providers, and the workforce. Governments are stewards of the system:

- *The ECEC system is joined up and easy to navigate, providing connections between ECEC and broader early childhood development systems and programs.*
- *Governments use funding, regulatory, and policy levers within the market environment in combination with service delivery to shape a system that is sustainable, flexible, aligned to need, and driven by outcomes for beneficiaries (Department of Education, 2023).*

Our submission provides further guidance on how this role of system stewardship might be applied in practice and shared across the system to resolve systemic challenges to create the conditions for a fairer, safer and more cohesive ECEC system where every child and family can thrive.

SUMMARY OF RECOMMENDATIONS

Recommendation 1: The Front Project recommends a system stewardship approach be embedded across the ECEC system. This would require the Government taking a lead in facilitating the careful establishment and adoption of such an approach and would include:

- Clearly articulating roles and responsibilities for all actors in the system, at all levels, inside and outside government.
- Discrete stewardship approaches with appropriate devolution to regional actors
- Ensuring that local, place-based approaches can be adapted to meet specific local needs, without sacrificing regulatory quality standards.
- Recognising the importance of local expertise in ensuring system sustainability and strength.
- Incorporating co-design principles that keep users at the centre of the process by embedding a place for their feedback.

Recommendation 2: The Front Project recommends that the Australian Government create a market stewardship role that includes:

- Taking an active responsibility for system outcomes and improving system coherence
- Creating a performance framework(s) for the system which can assess performance against system goals and outcomes, with regular feedback loops.
- Ensuring the right funding mix is in place so all children and families can access services they need from the Early Years system.
- Providing the additional non-financial supports needed to address the complex challenges and barriers to ECEC that many face in disadvantaged, non-metropolitan areas.
- Steering the system towards desired outcomes as appropriate, including through:
 - actively facilitating the ECEC market
 - signalling and advocacy
 - changing rules and incentives
 - capacity building
 - direct intervention
 - flexible pricing arrangements, responsive to conditions in hundreds of hyper-localised markets.
- Supporting decision making through increasing data collection, information sharing and transparency of data on market conditions.

- Developing rules (incentives, principles and standards) to define (not prescribe) how different actors within the system will interact.
- Identifying opportunities for steering the system towards desired outcomes.

Recommendation 3: The Front Project recommends that the Productivity Commission consider opportunities for creating the conditions for a more integrated and cohesive system including:

- Enhancing the child and family experience of the system as a cohesive entity and improving alignment with other sectors, such as health and schooling.
- Joining up and integrating ECEC with services such as health, school education and family services, including through universal and integrated community platforms.

Recommendation 4: The Front Project recommends utilising a range of funding models to ensure those who experience adverse childhood experiences are able to access financial support to ensure their child can access and participate in early learning.

Recommendation 5: The Front Project recommends the creation of a National Regional and Remote Early Childhood Strategy to provide a cohesive, national approach to ECEC in non-metropolitan areas, and a framework to ensure no child, family or community is left behind without accessible high-quality ECEC.

Recommendation 6: The Front Project recommends the Australian government adopt a universal 90 per cent subsidy to support all children to participate in ECEC.

Recommendation 7: The Front Project recommends ensuring equity in access and participation to achieve high participation rates, particularly in regional and rural areas and for children from areas of disadvantage by:

- Reviewing the access and participation pathways across the Early Years system to understand how effective and efficient they are in providing timely and quality supports for all children in Australia, especially in areas of extreme need and geographic scarcity.
- Reducing system complexity such that navigating the system, including its various forms of support and eligibility requirements, is not confusing and confronting for families.
- Reframing of entitlements so they rest with the child, with an emphasis on the long-term benefits of high-quality, accessible ECEC for children moving away from a parent benefit approach. Increasing the workforce participation of parents is a secondary, economic benefit.

Recommendation 8: The Front Projects recommends the Child Care Subsidy Activity Test is removed or revised to make sure no child misses out on ECEC, regardless of their parents' or guardians' working circumstances. A revision of the activity test should focus on:

- Amending the 24-hours per fortnight of subsidised care to reduce the disproportionate impact the test has on children facing disadvantaged circumstances.
- Ensuring families that have both low income and activity can access ECEC by considering a 40-hours subsidised care week entitlement.

Recommendation 9: The Front Project recommends creating the conditions for the ECEC system to prioritise the wellbeing of all children, recognise and value First Nations ways of knowing, learning, being and doing and amplify First Nation family and community voices as partners in policy and program design and delivery.

Recommendation 10: The Front Project recommends the Commonwealth, State and Territory Governments develop a strategic approach to data collection, information sharing and transparency across the Early Years system and its many domains.

Recommendation 11: The Front Project recommends better support inclusion by utilising data from the current priority areas model to drive targeted funding into areas where we know the most developmentally vulnerable children are.

Recommendation 12: The Front Project recommends taking a system stewardship approach to improve workforce challenges through several means, including:

- Providing clarity in the vision for the sector that may help to better define workforce needs.
- Achieving coordination in the system overall, facilitated by the system stewards, which is important to finding shared solutions. This is especially relevant to the workforce challenge, which is impacting the entire system, in each jurisdiction.
- Create greater accountability within the sector, which would increase the impetus to find solutions, with clear responsibilities for creating change.
- Challenging the valuing of women's work, care and the perception of ECEC in society.
- Creating pathways for CALD and First Nations workers including culturally safe learning that acknowledges culturally diverse practices and knowledge.
- Taking steps to ensure that the value of and wages and conditions for the ECEC workforce are improved, including introducing a 15 per cent Commonwealth supported wage supplement.

Recommendation 13: The ECEC funding model should be determined by the extent to which it supports equity for children and families.

IMPLEMENTING A SYSTEM STEWARDSHIP APPROACH

System stewardship is a holistic approach that acknowledges the complex and adaptive nature of policy when working in a system's context. At its core, system stewardship is a collective effort carried out at all levels, with stewards steering all participants within a system, including service providers and users, towards high-quality, long-term outcomes.

It is achieved through the mutual recognition by all actors of their joint responsibility for the health and performance of the system. As such, system stewardship enables the distribution of responsibilities between multiple stewards at different levels within the system, rather than a single entity.

Some elements of system stewardship are already evident within Australia's ECEC system such as:

- minimum standards and rules
- national partnerships
- forums for coordination and cooperation
- mechanisms for feedback

Implementation of a system stewardship approach would leverage these solid foundations and help create a cohesive vision for a quality, equitable and accessible early years system for all children.

Government's role

System stewardship is not about centralising control. **Importantly, Government's role would be to oversee a 'system' of stewardship rather than be the sole steward** (The Front Project, 2022a). It would support the creation of:

- a nationally cohesive vision and an ambitious framing to drive the systems-level changes needed for an effective and resilient Early Years system
- stronger system governance with greater accountability to a child's core developmental needs and shared family and caregiver needs
- decision-making that places children and families at the centre.
- rich and transparent information on quality and outcomes for the system's beneficiaries - children and families
- agility to allow for adaptation, modification and correction as changes are implemented throughout the system

All system stewards would have the responsibility of ensuring system flexibility.

Recommendation 1: The Front Project recommends a system stewardship approach be embedded across the ECEC system. This would require the Australian Government taking a lead in facilitating the careful establishment and adoption of such an approach and would include:

- Clearly articulating roles and responsibilities for all actors in the system, at all levels, inside and outside government.
- Discrete stewardship approaches with appropriate devolution to regional actors
- Ensuring that local, place-based approaches can be adapted to meet specific local needs, without sacrificing regulatory quality standards.
- Recognising the importance of local expertise in ensuring system sustainability and strength.
- Incorporating co-design principles that keep users at the centre of the process by embedding a place for their feedback.

SYSTEM STEWARDSHIP IN PRACTICE

Within a system stewardship approach, Government has a range of levers available to it to resolve systemic challenges. Engaging in system stewardship would facilitate the effective use of these levers to address the complex challenges facing the ECEC system.

A market that works for children and families

The current ECEC system is a mixed-market model of provision. However, the unique nature of human services, such as ECEC, means their system-wide management and delivery requires different approaches and capabilities as compared to a more conventional market.

A key opportunity for system stewardship lies in addressing the failings or limitations of market-based human services in the context of increasingly complex societal needs. Many shortcomings have resulted from the spread of ad hoc market reforms. The current market-based system:

- limits family choice through access constraints (including proximity and affordability) and limited information about services
- presents a highly diverse range of operating models

- limits information sharing relating to service quality or outcomes for children and families
- limits incentive to operate in thin markets, reducing access for some families
- structures subsidies to align with demand not the cost of supply
- requires services to be operating at close to capacity to remain sustainable
- struggles to balance a demand-driven market with the societal benefits of participation in early childhood education.
- creates a tension between the demand-driven market and known benefits of ECEC participation.
- does not clearly measure quality or outcomes for children and so has difficulty understanding quality or outcomes for children

Research in other contexts also suggests that vulnerable citizens are less likely to reap the benefits of market-based service reforms. Jilke (2015), for example, found that socio-economic position is a significant determinant of the quality of services citizens will receive and their ability to switch from unsatisfactory providers.

The concept of system stewardship could address these shortcomings to provide an opportunity for a sustainable, quality, responsive and equitable ECEC system in Australia (The Front Project, 2022a). If government aims to prevent a rise in inequity, stewardship roles (as opposed to regulatory roles) are crucial.

Within the context of system stewardship, market stewardship implies a much broader task than its traditional definition. A traditional view of market stewardship refers to the role of governments 'shaping' markets in the provision of public services. This approach focuses on inputs, such as funding and resources, and outputs, such as profits and service availability. When we refer to market stewardship in the context of system stewardship, we are referring to an approach which measures performance based on the outcomes which impact the system's beneficiaries - children and families. It goes beyond a market regulation role. Rather than just setting minimum market standards for service users, system stewardship is concerned with ensuring long-term outcomes and maximising public value (The Front Project, 2022a).

Recommendation 2: The Front Project recommends that the Australian Government create a market stewardship role that includes:

- Taking an active responsibility for system outcomes and improving system coherence.
- Creating a performance framework(s) for the system which can assess performance against system goals and outcomes, with regular feedback loops.
- Ensuring the right funding mix is in place so all children and families can access services they need from the Early Years system.
- Providing the additional non-financial supports needed to address the complex challenges and barriers to ECEC many face in disadvantaged, non-metropolitan areas.
- Steering the system towards desired outcomes as appropriate, including through:
 - actively facilitating the ECEC market
 - signalling and advocacy
 - changing rules and incentives
 - capacity building
 - direct intervention
 - flexible pricing arrangements, responsive to conditions in hundreds of hyper-localised markets.

- Supporting decision making through increasing data collection, information sharing and transparency of data on market conditions.
- Developing rules (incentives, principles and standards) to define (not prescribe) how different actors within the system will interact.
- Identifying opportunities for steering the system towards desired outcomes.

A more cohesive and integrated system

A child's experience of their early years is impacted by a variety of systems that can work to the support or the detriment of a child's health and wellbeing, development and opportunity to experience the best start in life (Shonkoff et al., 2012). Poor alignment or pathways between sectors can create barriers for families accessing the services necessary for the development and health of children (The Front Project, 2022a).

The ECEC system forms a crucial intervention in this mix but without the right investment, alignment and integration with other support services the level of disadvantage and vulnerability experienced by children and families can be exacerbated. It is when we see children's services work together, rather than apart, that we see significant beneficial outcomes for families.

Benefits of Integrated Services

Holistic integrated early learning services that promote safe and supportive environments for all children have great potential for improving outcomes for children experiencing socio-economic and other vulnerabilities (Moore, 2021b, Sanders et al., 2018). It was also identified as a key principle in improving outcomes for Aboriginal and Torres Strait Islander children (Early Childhood Australia and SNAICC, 2019). One way to do this is through Integrated Child and Family Centres (ICFC), which are a service and social hub where children and families go to access key services and connect with other families (Social Ventures Australia, 2023). These centres have been shown to meet many of the needs of children and families experiencing social-economic vulnerability (Social Ventures Australia, 2023).

Integrated services can offer significant benefits to *all* children and families, especially those who are being supported by social services (Wong and Press, 2012). Integrated support services can assist in redressing complex issues, including mental and physical ill health, stress and depression, unemployment, low adult literacy levels, limited or no income, and poor housing and neighbourhood living conditions. These issues impact the home environment and prevent early childhood development messages from being implemented (Early Childhood Australia and SNAICC, 2019).

Integration can enable the children's services system to respond efficiently and effectively to the diverse and complex needs of children and families in the one place, community or system and address service fragmentation (particularly for families with children with multiple needs who may need to navigate a complex array of diverse services in medical and allied health, education and social work). According to Moore et al. (2014), in addition to building more supportive communities, an ideal service system would be one that is based on a strong and inclusive universal set of services, has well-developed 'horizontal' linkages between the various forms of services that directly or indirectly support families of young children, and also has well developed 'vertical' linkages with secondary and tertiary services that enable varying levels of additional support to be provided to those with particular needs (Moore et al., 2014). Social Ventures Australia research showed that there are at least 100,000 additional children aged

birth to six, across 706 communities, who need an integrated ICFC but do not have access (Social Ventures Australia, 2023).

Integration In Practice

The 'Our Place' case study in Victoria provides significant insight into the benefits of an integrated approach in practice. Our Place is a unique cross-sectoral initiative of the Colman Education Foundation, which has a ten-year partnership with the Victorian state government. Our Place's vision is to ensure that all children and families succeed in life, no matter where they live and believes that education is the key to achieving this vision. Our Place takes a holistic place-based approach to supporting the education, health and development of all children and families in disadvantaged communities (McLoughlin et al., 2020). Through facilitated partnerships, the universal platform of schools become the central place for supports and services that can overcome many of the barriers to educational achievement. It is currently being implemented in nine sites across Victoria, with the support of government and a significant number of philanthropic partners.

The first Our Place site was Doveton where joined-up services are delivered. These include quality early learning, primary school education, wrap around health supports, adult volunteering, educational, training and job support and out of hours activities for children and families (McKenzie, 2019). This case study has shown the benefits of its integrated model on children's school preparedness and readiness to learn (language and self-regulation).

Furthermore, the Centre for Community Child Health which is within the Murdoch Children's Research Institute completed research for Community Hubs Australia which explored the impact of community hubs model (a place-based and citizen centric approach to providing refugee and migrant families support in their local communities) in Hume City Council (Victoria) on school readiness (Rushton et al., 2017). Rushton et.al (2017) highlight examples of positive changes in children that these hubs contributed to, for instance in smooth transitions to school, greater awareness from teachers in schools of the circumstances of migrant and refugee families and positive changes in families' social and emotional environments.

The Productivity Commission should consider opportunities to integrate early childhood education and care with health, school education and family services. To ensure all children are supported in all health, wellbeing and family domains to fully participate and benefit from high quality preschool education, it will be crucial to consider:

- opportunities for service integration
- the need to build capacity and partnerships in communities, particularly communities facing disadvantage

More transparent sharing of data may support improved system cohesion and allow different sectors to benefit from a shared understanding (see recommendation 7).

Recommendation 3: The Front Project recommends that the Productivity Commission consider opportunities for creating the conditions for a more integrated and cohesive system including:

- Enhancing the child and family experience of the system as a cohesive entity and improving alignment with other sectors, such as health and schooling.
- Joining up and integrating ECEC with services such as health, school education and family services, including through universal and integrated community platforms.

A system for every child

In Australia a child's experience in ECEC is very much determined by where they live whether the child or family has experienced disadvantage or experienced an adverse childhood experience (ACE). More than 20 per cent of our nation's four and five year olds are unable to access high-quality early childhood education and care (The Front Project, 2022c). And each year, more than 60,000 Australian children (22.0 per cent of all children in 2021) are assessed as developmentally vulnerable when they start school (The Front Project, 2022c). We know that experiencing disadvantage at a young age can limit opportunities for a child to develop cognitive, physical, social and emotional skills that create the foundation for healthy, happy and productive lives (The Front Project, 2020). We also have economic modelling demonstrating that ECEC has a 103% return on investment (The Front Project, 2019). ECEC helps set children on a path of higher educational achievement, increases workforce participation and governments benefit from increased taxation now and the higher earnings of children in years to come (The Front Project, 2019).

Growing up in poverty is a key factor that predicts whether a child is developmentally vulnerable by the time they start school (The Front Project 2022c). While economic poverty is just one form of disadvantage, it does illuminate disparity in access to quality ECEC. Only 7 per cent of children from low socio-economic status (SES) families attend the highest quality programs, compared to 30 per cent of children from high SES families (Torii et al., 2017). This is important, as children in low-income families have the most to gain from high-quality ECEC with ongoing participation improving educational and health outcomes (Fenech and Skattebol, 2021). Other factors that can impact an experience of disadvantage include whether a child is living in a 'jobless household', are living with a sole parent, experience disability, are in out of home care or live in remote areas (The Front Project, 2020).

In addition, Aboriginal and Torres Strait Islander children have high levels of 'vulnerability' - 42.3 per cent are vulnerable on one or more developmental domains, compared to 20.6 per cent for non-Aboriginal and Torres Strait Islander children (the Front Project, 2022c). Children from language backgrounds other than English are likely to face challenges with language. More than 90 per cent of children who are not proficient in English are developmentally vulnerable, with 60.5 per cent of these children vulnerable on more than one domain (The Front Project, 2022c). This data shows that a number of policy interventions are needed to ensure the children who would benefit the most from ECEC are able to access and participate in learning, and that the ECEC system needs to be welcoming and inclusive for all children.

Geographic location also impacts both quality and access. Data shows that the further you are from the city, the more likely you will be at risk of developmental vulnerability:

- Children living in very remote Australia at least twice as likely to be developmentally vulnerable compared to those in major metropolitan areas (AEDC, 2019).
- 14% of ECEC services in very remote areas are rated as Exceeding the National Quality Standards (NQS), compared to 25% in outer regional areas and 29% in major metropolitan areas (ACECQA, 2022).
- In 2022, research by the Mitchell Institute into 'childcare deserts' found that 568,700 children aged 0 - 4 years, or 36.5% of children in this age group, live in neighbourhoods with this classification. The study also found that families in regional and remote areas are the most at risk of having poor access to ECEC (Hurley et al., 2022).

Ensuring that all children thrive, everywhere, is important. Every child who is not thriving is a missed opportunity: an opportunity at the individual and community level to support improved

development and achievement, to support children to learn in school, to go on to further education and employment. It is also a missed opportunity for the Australian economy and society, because children who continue to face barriers to learning are more likely to suffer from poor health and wellbeing and are less likely to lead productive and happy lives without the stress of poverty (Heckman, 2006, Lamb and Huo, 2017a, Kautz et al., 2014).

One of the challenges facing the ECEC system is how it can best support the learning and development of children who have faced disadvantage or adverse childhood experiences. The increasing awareness of ACEs, their impact on the lives of children, and the critical importance of early intervention is backed by growing international evidence. For example, studies in the US and the United Kingdom have shown that being able to observe and identify a child's ACE early, especially when captured by education and health professionals who routinely connect with the child on a frequent basis. The [ACT Kindergarten Health Check program](#) provides a population-level whole child screening upon entering kindergarten, helping to identify ACEs among children earlier, providing faster supports and access to their entitlements, and better support families through ACEs that impact children in their care.

Given some of the unique challenges faced in regional, rural and remote Australia, The Front Project recommends building on the work to date to create a new National Regional and Remote Early Childhood Strategy. While some States and Territories have their own regional and rural ECEC strategies, a national strategy would create a cohesive, national approach to ECEC in non-metropolitan areas, and would provide the framework needed to ensure no child, family or community is left behind without accessible high-quality ECEC.

This national strategy would complement existing strategies and policies already in place to improve ECEC access and therefore educational and socio-economic outcomes in regional, rural and remote Australia, such as the:

- National Workforce Strategy.
- National Regional, Rural and Remote Tertiary Education Strategy.
- National Aboriginal and Torres Strait Islander Early Childhood Strategy.

The strategy should be developed in close consultation with families, communities and Early Childhood professionals in the communities that would be impacted to address the unique barriers with the appropriate solutions.

Funding should also be allocated for representative, independent Aboriginal and Torres Strait Islander voice and policy development, including the National Congress of Australia's First Peoples, SNAICC and other peak bodies across child and family support, health, education, women and disability sectors.

Additionally, by recognising the viability issues facing communities, thus limiting access, governments can lead by incentivising provision of new services accordingly with the resultant economic benefits to the child, family and community.

Recommendation 4: The Front Project recommends utilising a range of funding models to ensure those who experience adverse childhood experiences are able to access financial support to ensure their child can access and participate in early learning.

Recommendation 5: The Front Project recommends the creation of a National Regional and Remote Early Childhood Strategy to provide a cohesive, national approach to ECEC

in non-metropolitan areas, and a framework to ensure no child, family or community is left behind without accessible high-quality ECEC.

A fairer system

Each day families in Australia come face to face with the challenges of access to and participation in quality ECEC. And parents with children aged 0-5 years must make decisions about ECEC offerings on behalf of their children and their family in a complex mixed-market environment (The Front Project, 2021).

As the social inequality gap widens, some children are being left behind. Many families face significant financial and non-financial barriers in accessing quality ECEC services. In fact, the Front Project research found many parents felt they had little genuine choice, despite the apparent array of care and education options inside and outside the formal ECEC system, once affordability, lack of available places, misalignment with the support they needed to work, or lack of accord with their beliefs or values, were taken into account (The Front Project, 2021).

Financial Barriers

Financial barriers include high ECEC costs, which are a significant and complex barrier for families to access ECEC. The Front Project research with families found that 52 per cent of families agreed that 'once the cost of childcare is factored in, it is hardly worth working' (The Front Project, 2021). This disproportionately impacts women. Of all parents surveyed who identified they were not working, including those not using ECEC, 76 per cent of women considered high ECEC costs as a barrier to working as much as they wanted to, compared to 54 per cent of men (The Front Project, 2021).

In Australia, as of June 2022, 87 per cent of all children aged 4, and 22 per cent of all children aged 5 were enrolled in preschool programs. However, there are clear correlations between access to ECEC and socio-economic status with the more advantaged areas having fewer people living in areas of low provision (Hurley et al., 2022, ABS, 2023).

High ECEC costs disproportionately impact families experiencing disadvantage, with research revealing that in 2018, low-income families spent nearly *twice* the proportion of their weekly income on ECEC as high-income families (Moore, 2021a). Many vulnerable children do not attend ECEC, have access to lower-quality ECEC only, or attend for fewer hours than more advantaged peers (Lamb and Huo, 2017b). Despite many efforts from Government, costs are continuing to rise, with the 2022 Report on Government Services highlighting that the cost of 50 hours of ECEC rose by 1.8 per cent in a year (Productivity Commission, 2022).

We support the government's changes to make childcare cheaper from 1 July 2023, including increasing the subsidy rate for families earning less than \$530,000 and increasing the maximum subsidy rate to 90 per cent for families earning less than \$80,000 per annum. While this reform will help make childcare cheaper for many families, we support the Australian government adopting a universal 90 per cent subsidy rate. Childcare is one of the 'biggest policy levers' the government can pull to boost women's economic empowerment and long-term economic security (Grattan Institute, 2021). The Grattan Institute estimates that while costing \$12 billion per year, a universal subsidy set at 95 per cent would boost GDP by \$27 billion per year (Grattan Institute, 2021). It is a significant investment in Australia's future that would also help steer the ECEC system towards a universal design, where all children can access and benefit from early learning, without parents having to choose between work or childcare, regardless of income.

Recommendation 6: The Front Project recommends the Australian government adopt a universal 90 per cent subsidy to support all children to participate in ECEC.

Non-Financial Barriers

Non-financial barriers preventing access to ECEC include structural barriers such as lack of transport, time poverty, disability, lack of literacy skills and unstable home situations (Skattebol, 2016). The circumstances of a child's location and family health and wealth, their distance from major cities, their household and community education levels, and their language spoken at home, can unfairly prevent them from being on track and thriving. The barriers are particularly high in Aboriginal and Torres Strait Islander communities (Early Childhood Australia and SNAICC, 2019). It is important to note that Aboriginal and Torres Strait Islander children's enrolment rate for preschool programs is higher than that of non-Indigenous children.

- In 2022, over 95% Aboriginal and Torres Strait Islander children were enrolled a preschool program for 15 hours or more per, representing over 6% of all children enrolled in preschool programs (ABS, 2023).

This reflects a high degree of accessibility of preschool services in terms of enrolment for this cohort. However, Indigenous children are less likely to *attend* preschool than their non-Indigenous counterparts (ECA, 2019). This shows the need for more trauma informed and culturally safe settings and practical family supports (SNAICC, 2019). The Government should work with Aboriginal and Torres Strait Islander families and services to address these challenges to ensure Indigenous children are able to participate and learn in the safest environment for them.

For children who are growing up in disadvantaged circumstances, further policy barriers exist, for example the activity test. Currently this test is a barrier to universal access to ECEC and its removal would increase access to ECEC for families who do not qualify for a minimum level of subsidised access due to their work/life situation. Reasons for not fulfilling this requirement may be directly linked an experience of disadvantage; including health issues of parents of guardians that limit their ability to undertake employment, visa status or irregular workforce participation such as casual employment or unemployment. Furthermore, evidence from the Productivity Commissions 2015 Report suggests that children from non-working families can be at risk of development vulnerability and therefore have the most to gain from quality ECEC. For example, research by Impact Economics and Policy (2022) found that several vulnerable family groups compared to families earning over \$200,000 were more likely to be subject to the activity test, limiting their subsidised care:

- Single parent families are over three times likely to be limited to one day of subsidised childcare per week
- Non-English speaking families are over six times likely to be limited to one day of subsidised childcare per week
- Low-income families earning between \$50,000 - \$100,000 are over six times likely to be limited to one day of subsidies childcare per week

Revising or removing the activity test will help break the cycle of disadvantage and improve ECEC access for Australia's most disadvantaged children.

The Front Project also recommends the reframing of entitlements in the ECEC system towards the child. The current focus rests more on the entitlements of parents as key beneficiaries in the ECEC system. While we recognise the multiple beneficiaries in the ECEC system, we believe there is a need to clarify the fundamental importance of putting entitlements to children first.

This would allow a flexible system to work for children regardless of the context they are living in or the changes they experience in that context.

Flexibility

Flexibility of hours is another challenge. The Front Project research found that parents felt that their care and education needs were not being fully met including the availability of affordable ECEC for days/hours needed in a suitable location (The Front Project, 2021). The research also suggested that parents would like to see government intervention to help ensure a good geographic spread of services are available to parents and that there are centres with very extended opening hours with potential weekend options.

These findings are consistent with *Restacking the Odds* research that investigated barriers and facilitators of ECEC participation in three Australian communities. The study showed considerable convergence across parent and provider views on the importance of various ECEC participation barriers and facilitators and highlights specific divergences (Beatson et al., 2022). Findings indicate the need to increase flexibility in program formatting so participation can be coordinated with the demands of work and other family responsibilities.

Most childcare services provide standard hours of care. They typically operate from 7-8am to 6pm to suit parents or carers that work a typical 9am-5pm day. 'Nonstandard hours of care in childcare services' is an indicator of governments' objective to ensure that government funded childcare services are accessible and flexible. Provision of nonstandard hours of care can be influenced by a range of factors, such as costs to services and parents, demand for care, availability of carers, and compliance with legislative requirements. In-home care and family day care services provide the most flexibility. Nationally in 2021 (Productivity Commission, 2022b):

- 65% of in-home care services provided non-standard hours of care
- 51.1% of family day care services provided non-standard hours of care
- 42.1% of OSHC services provided non-standard hours of care (for primary school-age children)
- 41.5% of all CCS approved childcare services provided non-standard hours of care - CCS approved services mainly provided non-standard hours of care before 7am on weekdays
- 40.7% of centre-based day care provided non-standard hours of care.

In creating any solutions, we must address the most pressing issues of quality, unequal geographic and demographic access, affordability and family choice (The Front Project, 2021). Greater participation rates in ECEC, particularly for children and families experiencing disadvantage, are expected to have a large impact on the learning and developmental outcomes of Australian children.

Recommendation 7: The Front Project recommends ensuring equity in access and participation to achieve high participation rates, particularly in regional and rural areas and for children from areas of disadvantage by:

- Reviewing the access and participation pathways across the Early Years system to understand how effective and efficient they are in providing timely and quality supports for all children in Australia, especially in areas of extreme need and geographic scarcity.
- Reducing system complexity such that navigating the system, including its various forms of support and eligibility requirements, is not confusing and confronting for families.

- Reframing of entitlements so they rest with the child, with an emphasis on the long-term benefits of high-quality, accessible ECEC for children moving away from a parent benefit approach. Increasing the workforce participation of parents is a secondary, economic benefit.

Recommendation 8: The Front Project recommends the Child Care Subsidy Activity Test is removed or revised to make sure no child misses out on ECEC, regardless of their parents' or guardians' working circumstances. A revision of the activity test should focus on:

- Amending the 24-hours per fortnight of subsidised care to reduce the disproportionate impact the test has on children facing disadvantaged circumstances.
- Ensuring families that have both low income and activity can access ECEC by considering a 40 hours subsidised care week entitlement.

A safer and more inclusive system for First Nations Children

Linked to access and participation is the issue of cultural safety and inclusion. We welcome recent budget announcements to invest \$1.9 billion in initiatives for Aboriginal and Torres Strait Islander people and communities. We welcome the focus on further building First Nations community partnerships and a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector to enable the delivery of high quality and culturally appropriate services to First Nations communities. Recognising this process, there is still much to be done.

The Apiary Fellowship and the Front Project Summit on Transforming the Early Learning system in October 2022 clearly heard a call from participants for a safer system (Orange Compass, 2023). This included the need for:

- Every early childhood education and care service to be culturally safe and has embedded authentic culturally grounded practices
- First Nations services that are open to all
- Early learning that is safe and facilitates a positive transition to an adult life that meets the child's full potential
- Children to have physical, social, emotional and sexual safety so they can participate and contribute to community and society
- Diverse inclusive settings in which each child in Australia from birth to school has the opportunity to connect, learn, explore, engage and develop
- Children (that are right now unheard or unseen) to be given transformative access and are genuinely side by side with all other children

There are also many strong and Aboriginal and Torres Strait Islander led examples to build upon. Examples include The Nawarddeken Academy, which offers a unique model of bi-cultural, community-driven education in remote Indigenous communities in west Arnhem Land. Another example is Children's Ground, a First Nations organisation ending injustice and disadvantage through innovative approaches to education, health and employment services for families in the Northern Territory. A key pillar of Children's Ground is connecting communities with culturally safe services and support to live their best lives.

Improving outcomes for Aboriginal and Torres Strait Islander children will require the Australian Government, working alongside state and territory governments to promote and support effective two-way learning processes of genuine partnership development and cultural competency between mainstream services and local Aboriginal and Torres Strait Islander Elders, services and communities (Early Childhood Australia and SNAICC, 2019).

Recommendation 9: The Front Project recommends creating the conditions for the ECEC system to prioritise the wellbeing of all children, recognise and value First Nations ways of knowing, learning, being and doing and amplify First Nation family and community voices as partners in policy and program design and delivery.

Creating the knowledge base for an outcomes driven system

Many shortcomings have resulted from the spread of market reforms against a backdrop of increasingly complex societal needs. The current market-based system:

- limits information sharing relating to service quality or outcomes for children and families
- does not clearly measure quality or outcomes for children and so has difficulty understanding quality or outcomes for children (The Front Project, 2022a)

Creating the knowledge base for an outcomes driven system would support decision making by increasing:

- availability of timely, accurate data on outcomes for children and families
- data linkages across complex and diverse domains of service delivery

This requires a detailed evidence base and collection of comprehensive outcomes data (The Front Project, 2022b). This approach would thereby enable system stewards to take active responsibility for system outcomes by enabling:

- greater understanding of conditions in hundreds of hyper-localised markets
- stronger safeguards and potential for early intervention
- implementation of a performance framework that can assess the system against coherent goals and outcomes, with regular feedback loops
- better assessment of pathways across the Early Years system to improve how system actors can better respond to children's needs

This needs to be accompanied by strategies to build capability and increase capacity to collect, interpret and act on data.

With the current review of the Inclusion Support Program (ISP), there is an important opportunity to use existing data about where there are high rates of disadvantage and use this information to drive funding decisions to better support inclusion. It is critical that the program supports some of the most disadvantaged children and removes as many barriers as possible to ensure children with disability, mental health issues or who have experienced trauma can participate in and benefit from ECEC. Currently, ISP relies on Centre staff to apply for funding and/or supports for a child. This process is overly onerous with many inefficiencies.

We recommend the Australian Government consider an additional element of the ISP funding, utilising the current priority areas model under the Community Child Care Fund, which uses data from the Australian Bureau of Statistics, Australian Early Development Census and the Socio-Economic Indexes for Areas. This data tells us where the most developmentally vulnerable children live. This proportion of ISP funding could then be divided based on the number of children experiencing developmental vulnerability. Funding can therefore be directed not only to the communities with the highest developmental vulnerability, but also to the specific services operating within the community, to deliver high-quality ECEC to the children who need it most.

Recommendation 10: The Front Project recommends the Commonwealth, State and Territory Governments develop a strategic approach to data collection, information sharing and transparency across the Early Years system and its many domains.

Recommendation 11: Better support inclusion by utilising data from the current priority areas model to drive targeted funding into areas where we know the most developmentally vulnerable children are.

A system that values the work and the workforce

Quality is a key driver of outcomes for children (Goldfeld et al., 2016). And the quality of ECEC is directly proportional to the quality and distribution of its workforce (The Front Project, 2021). This acknowledges the vital importance of educator-child relationships and experience. Research clearly shows that high-quality adult-child interactions, determined in part by the quality of these relationships, is vitally important to children's cognitive, social and emotional (Tayler et al., 2016, Melhuish et al., 2015, Taggart et al., 2015). It can also lead to a better foundation for school success and increased educational and occupational opportunities later in life (O'Connor et al., 2020).

While we recognise the budget announcement to support training and professional development, the current market model is failing to address enduring challenges within the ECEC workforce, with concerns about wages and conditions, retention, attraction and training (The Front Project, 2022a). It is not an understatement to say the ECEC workforce in Australia is in crisis, with attrition and vacancy rates running much higher than they were pre-pandemic. Data from the National Skills Commission showed there were more than 7,000 vacancies across the sector in September 2022 and this trend is continuing with strong current and projected future demand (Borys, 2022, National Skills Commission, 2022).

Wages and conditions are seen as a barrier to attracting and retaining staff. Wages in the ECEC workforce are low relative to other sectors, with average weekly earnings for early childhood teachers at 10 per cent less than the national weekly average (ABS, 2022).

Given the natural relationship between quality delivery and workforce, the consequences of poor wages and conditions impacts across the whole system. The inability to retain workers in the long term also has implications for quality. High workforce turnover and a lack of retention of skilled and experienced ECEC teachers and educators has been cited as a key barrier to services exceeding the National Quality Framework and maintaining an excellent rating (ACECQA, 2019).

Lower attrition paired with greater professional development opportunities and addressing low wages are expected to improve the quality of delivery (The Front Project, 2022a). The Front Project recommends a 15 per cent Commonwealth funded wage supplement for ECEC educators and early childhood teachers. This will not only help to attract and retain workers, but with a mostly female workforce, it would also support other policy objectives such as gender equality (The Front Project, 2023).

The Front Project has also seen the positive impact of the Upskill Program and Online Community that is supporting ECEC workers, primarily women, to successfully complete their Bachelor of Early Childhood Education. The Upskill Program helps to address the national shortage of Early Childhood Education Teachers and upskill existing staff. The content of the program depends on the user (organisational, individual or government) and consists of a combination of support such as enrolment support, webinars, mentoring, access to the online community, sector news, events and more. The Upskill Program has a consistent 72% retention

rate across all intake streams. This compares to Australian Curriculum, Assessment and Reporting Authority (ACARA) who cites Federal data on completion rates for students who enrol in Bachelor of Early Childhood education courses at less than 15% over the last 10+ years.

The Front Project also manages an active online community for ECEC voices, which is also supporting ECEC practitioners. It provides an accessible forum for early childhood professionals to connect, share, learn and deepen their practice. The central Connection Hub is the starting place to support practitioners and there are nine sub-groups on different topics of interest.

It is also worth considering deeper system forces here including Australian society's conceptualisation and framing of "care" (broadly defined and acknowledging that ECEC's primary purpose is early learning and education). This framing of care as well as "women's work" underpins a low power narrative in the ECEC system (McKenzie and Millar, 2022). This is constantly reinforced through social norms, media and even in training. It also plays out in workforce statistics:

- The majority of the total ECEC workforce (92.1 per cent) is female, with males most strongly represented in vacation care (19.4 per cent) and outside school hours care (18.6 per cent) services (Social Research Centre, 2022).

Addressing deeper system forces would require a mindset shift at a societal level towards recognising and valuing the crucial contribution of care work in our society. Changing societal mindsets is necessarily a long-term and multilayered effort, more complex than large scale behavioural change, but with the most transformative potential of all the categories of systemic change.

In this context, movement towards a system stewardship approach - to the extent this is characterised by a united vision, a cohesive decision-making environment, and a clear articulation of how actors are expected to work together - may help to mitigate these ECEC system challenges, including that of workforce.

We recognise the importance of this consultation and would welcome our inclusion in any further engagements on relevant matters.

Recommendation 12: The Front Project recommends taking a system stewardship approach to improve workforce value and conditions through several means, including:

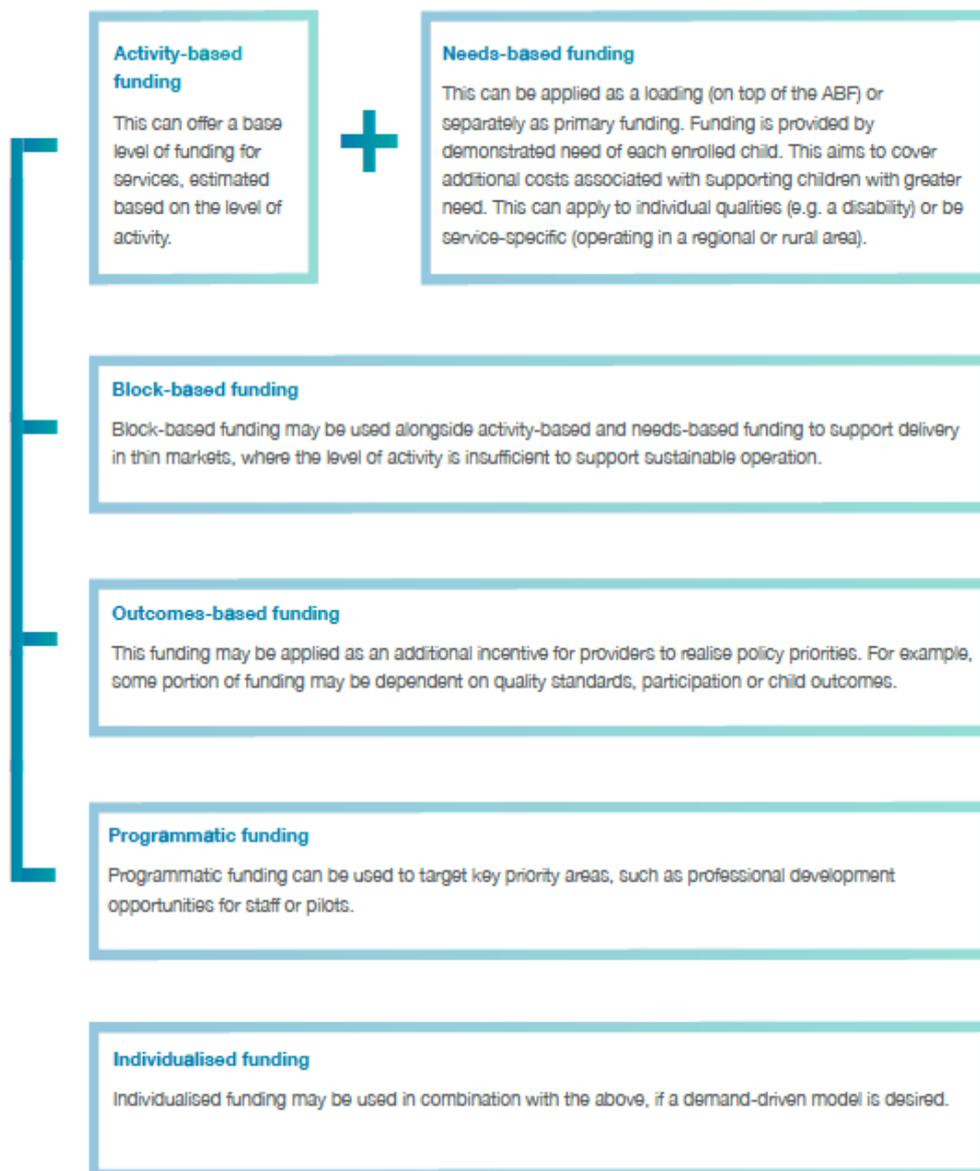
- Challenging the valuing of women's work, care and the perception of ECEC in society.
- Providing clarity in the vision for the sector that may help to better define workforce needs.
- Achieving coordination in the system overall, facilitated by the system stewards, which is important to finding shared solutions. This is especially relevant to the workforce challenge, which is impacting the entire system, in each jurisdiction.
- Create greater accountability within the sector, which would increase the impetus to find solutions, with clear responsibilities for creating change.
- Creating pathways for CALD and First Nations workers, including culturally safe learning that embeds culturally diverse practices and knowledge.
- Taking steps to ensure that the value of and wages and conditions for the ECEC workforce are improved, including introducing a 15 per cent Commonwealth supported wage supplement.

Recommendation 13: The ECEC funding model should be determined by the extent to which it supports equity for children and families.

In 2022 The Front Project engaged Deloitte Access Economics to explore funding models to best support the ECEC system to achieve its objectives of accessibility, affordability and quality. In human service delivery systems, several common types of funding are employed, including:

- Block-based
- Activity-based
- Individualised
- Needs-based
- Outcome-based
- Programmatic (The Front Project, 2022b).

Figure 1: Funding Models



Source: Deloitte Access Economics (2022).

A combination of these funding types is likely to best support the ECEC system (The Front Project, 2022b). Given the ECEC sector is made up of hyper-localised and interconnected

markets, flexibility is required to make sure services can operate under different conditions. For example, whether a centre is rural or urban, what the local demographics are, and the availability of resources will all contribute to the supply costs for providers and will influence what funding is required (The Front Project, 2022b).

Other approaches may also be considered in combination with a wage increase that may have less of a direct impact increasing ECEC fees for families. They include adjustments to Fringe Benefit Tax to increase after tax pay for relevant staff working in not-for-profits and payroll tax exemptions in for-profit centres. (The Front Project, 2022b).

Given the diverse inequities that exist between children, families and communities and the productivity gains from universal ECEC, any funding model decision must be done through the lens of equity. That is, how can the model support an equitable system and ensure the most disadvantaged children and families can access and benefit from the ECEC system.

Please note that the above section on ISP also relates to funding models.

Absorbing economic shocks

The COVID-19 pandemic, which had immediate, far reaching and devastating consequences for many parts of Australia's economy, demonstrates the importance of the ECEC sector being able to absorb shocks. In 2020, The Front Project commissioned Dandolo Partners to develop a model to estimate the impact of different public health and economic downturn scenarios on demand for and viability of, the ECEC sector (Dandolo Partners, 2020). The modelling shows that the impact is varied across ECEC services. In the economic downturn scenario, a fall in employment will have a moderate impact on a sector as a whole, with an overall fall in demand of 2.3% and 87% of services remaining viable. However, the effects will be felt unevenly, depending on service type and geography. Demand for long day care decreased and demand for preschool increased (Dandolo Partners 2020).

In the public health lockdown scenario, demand directly impacted long day care centres because their revenue is driven by day-to-day occupancy. This is not the case for preschools, which receive more funding that is not reliant on occupancy (noting that preschool funding varies by jurisdiction) (Dandolo Partners, 2020). Networks of ECEC services were able to share the burden, while the impact on standalone services are divided into the two extremes – not viable and viable. These differences reflect the ability of networks to cross-subsidise over their network to manage losses. Standalone services do not have this ability and, those that are unable to sustain prolonged losses rapidly become unviable (Dandolo Partners, 2020). The modelling suggested that if the government maintained the subsidy in lockdowns and supported base funding equivalent to 25% of a service's pre-COVID-19 revenue, it would prevent nearly 1000 centres becoming unviable (Dandolo Partners, 2020).

While the government can provide a subsidy boost to support the ECEC sector weather a shock, this may not always be possible at the rate needed or there is the risk that providers may raise out of pocket expenses for families and pocket the subsidy boost (The Front Project, 2020b). Several options, from light touch to more intensive options are available to support the hyper localised ECEC market be more resilient to shocks and keep prices more stable.

While the Front Project has conducted an analysis of the pros and cons of each option, given the ACCC is currently conducting an inquiry into the market for the supply of childcare, it is important that this process is used to ensure the market is resilient, competitive and most importantly, supports universal ECEC and achieves learning outcomes for all children.

Recommendation 13: the ECEC funding model should be determined by the extent to which it supports equity for children and families.

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