



Brotherhood  
of St Laurence

Working for an Australia free of poverty

# Response to the Productivity Commission's *Inquiry into Childcare and Early Childhood Learning*

Brotherhood of St Laurence

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## Summary

There is extensive and compelling evidence that increasing the participation of disadvantaged children and their families in high quality early childhood education and care (ECEC) improves outcomes for these children and yields significant productivity gains for the economy and the broader community. High quality early childhood programs generate benefits of between \$8 and \$14 for every \$1 invested (Heckman et al. 2010).

However in Australia, children from low-income families, Aboriginal and Torres Strait Islander children, children from CALD backgrounds, those living in regional areas and children with a disability are all underrepresented in childcare in Australia. Some of these groups are also under represented in preschool participation (SCRGSP 2013).

Children like these are the ones who make the biggest developmental gains by attending high quality ECEC services. Their families are the ones most likely to increase their economic participation if they are able to access affordable childcare. As a result, the greatest benefit to individuals and the broader Australian society can be achieved by increasing the participation of disadvantaged families.

The Brotherhood of St Laurence acknowledges and supports the recent Council of Australian Governments reforms to improve quality, introduce universal access to preschool for four-year-olds and to integrate preschool and childcare. However significant barriers remain for disadvantaged children and their families to engage in ECEC.

These barriers include:

- the cost of ECEC, which means that it is not affordable for many disadvantaged families
- the way the subsidy system is structured, which makes it difficult to understand and can act as a barrier for disadvantaged families and service providers
- the inflexibility of the service system, which means that disadvantaged families may find it difficult to use and which therefore impacts on their ability to take up employment.

## The Brotherhood of St Laurence recommends:

### 1. Make childcare more affordable for disadvantaged families

- Combine the Child Care Benefit and Child Care Rebate into one payment with the following features as recommended by Australia's Future Tax System Review (2010):
  - a high rate of subsidy for low-income families that covers most (up to 90 per cent) of the costs of childcare. This would involve a smaller co-payment for low-income families
  - coverage of the full costs of childcare for at-risk children and children facing multiple disadvantages, without their parents meeting the work, training or study participation requirements.

**2. Increase the flexibility of Family Day Care and ensure the sustainability of high quality, accredited Family Day Care programs**

- Provide a financial incentive for Family Day Care services to provide care at short notice and care outside standard operating hours for disadvantaged families working casual, insecure or shift work.
- Increase the operational subsidy for Family Day Care to ensure the sustainability of quality, accredited programs.

**3. Assist vulnerable and at risk children access ECEC by reforming the Special Child Care Benefit**

- Simplify the eligibility criteria for the Special Child Care Benefit so that ECEC Centres have a better understanding of the availability of the benefit.
- Review the assessment process and ensure the most appropriately qualified Commonwealth agency undertakes the eligibility assessment for the SCCB.
- Reduce the complexity of the application process for the Special Child Care Benefit for ECEC Centres.
- Increase the level of the Special Child Care Benefit to recognise the additional costs for ECEC Centres in providing care for children with complex needs.
- Remove the 18 per cent cap on the Special Child Care Benefit as a percentage of the total Child Care Benefit payable to Centres.
- Run a targeted education campaign for ECEC Centres and at risk families outlining the assistance available through the Special Child Care Benefit.

**4. Support more joined-up, place-based approaches to service delivery for families in highly disadvantaged communities**

- Trial integrated child and family centres/early years service hubs in disadvantaged communities with the following features:
  - Programs to build the capacity of disadvantaged parents to meet the developmental needs of their children during their first three years of life
  - Capacity to link disadvantaged children and families to universal services
  - Assistance for the workforce participation of disadvantaged parents.

**5. Continue to implement the National Quality Framework, including higher level qualifications for staff and an increase in staff to child ratios to assist disadvantaged children and families to achieve better outcomes.**

# **1 The Brotherhood of St Laurence and early childhood education and care**

The Brotherhood of St Laurence (BSL) is an independent non-government organisation with strong community links that has been working to reduce poverty in Australia since the 1930s. Based in Melbourne, but with a national profile, the BSL continues to fight for an Australia free of poverty. We undertake research, service development and delivery, and advocacy with the objective of addressing unmet needs and translating the understandings gained into new policies, new programs and practices for implementation by government and others.

Australia's future depends on the capacity, skills, confidence and resilience of its youngest citizens. But many children are at high risk of being left behind, and of living lives that fail to meet their potential.

In 2011, around 25 per cent of Australians experienced some level of exclusion (Brotherhood of St Laurence & Melbourne Institute Social Exclusion Monitor 2013).

According to a recent UNICEF report, almost 11 per cent of Australian children are living in relative poverty (UNICEF Innocenti Research Centre 2012). National data shows that 22 per cent of children in their first year of formal schooling are developmentally vulnerable on one or more domain/s, with 10.8 per cent of children developmentally vulnerable on two or more domains (Australian Early Development index 2012).

The connection between childhood poverty and lifelong disadvantage is well known. It is a cycle that the Brotherhood of St Laurence is working to break.

Our aim is to ensure that all children are able to share in the opportunities that Australia offers. Our objective is to ensure that each Australian child has access to services that nurture development. Our programs support parents, families and communities to help provide children with a strong foundation, and to support families to access educational and employment opportunities. These include Family Day Care, the Home Interaction Program for Parents and Youngsters (HIPPY) playgroups and family support services. The Brotherhood is also a founding partner in the establishment of Goodstart Early Learning, an organisation which operates 641 ECEC centres catering for more than 73,000 children around Australia.

## **2 This submission**

The Brotherhood of St Laurence recognises that ECEC services are designed to achieve positive outcomes for children and to enable workforce participation of parents.

This submission focuses on how the ECEC system can be improved to better engage disadvantaged children and families in high quality ECEC and related services.

The term high quality is generally understood to mean those characteristics included in the National Quality Framework, particularly high teacher/adult to child ratios and qualified staff.

### 3 Increasing access to affordable ECEC

A significant barrier for disadvantaged children and families is the cost of ECEC. The way the subsidy system is structured makes it difficult for this group to understand what they are entitled to and how those entitlements change when their work or personal circumstances change.

In the current system there are two main forms of subsidy. The Child Care Benefit (CCB) is a means-tested benefit provided on a sliding scale according to income. Key features include 24 hours of ECEC care which can be claimed without having to fulfil the work test. The Child Care Rebate (CCR) is a non – means tested rebate that subsidises 50 per cent of the cost of care (up to an annual ceiling of \$7500).

However even on the full level of benefit, both of these subsidies will not cover the full cost of ECEC. There will be an out-of-pocket daily cost charged by the childcare centre ranging between \$5 and \$40, depending on the level of their daily fees.

While there are additional targeted subsidies to meet the needs of particular disadvantaged families like the Special Childcare Benefit (SCCB) and the Jobs Education and Training Child Care Fee Assistance Scheme (JETCFA), the tight eligibility and the administration of both can be confusing for families to understand. Many disadvantaged families have difficult issues to manage day to day (which may also include language and literacy issues) and face a variety of personal and financial pressures. Having the time and ability to understand the complex eligibility criteria for childcare subsidies can be too difficult and as a result can work as a barrier to taking up some form of paid work when the opportunity arises.

Secondly, many disadvantaged parents work casual jobs or shifts. The proportion of Australian employees engaged in casual work has grown significantly over the past three decades from 15.8 per cent in 1984 to around 25 per cent today (ACTU 2011). Low-wage workers and particularly women are overrepresented in insecure work. Data from the Household, Income and Labour Dynamics (HILDA) Survey in 2010 showed that 19 per cent of female workers between 25 and 65 years were in casual work and 14 per cent of female workers aged between 25 and 65 years were in low-wage jobs (F Azpitarte 2014, pers. comm).

This irregular work can mean that disadvantaged families don't know from week to week what childcare they will actually need. Many of these families also need care at short notice or care at times that are outside standard operating hours for ECEC Centres. The centres often cannot accommodate both of these types of care because they need advance notice in order to make sure they have adequate places for children and because they cannot afford the financial implications of keeping Centres open outside standard operating hours but not having all places filled. Thus there are disincentives both for ECEC centres to provide more flexible care and for disadvantaged families to participate in some form of paid work.

In order to increase the affordability of childcare for disadvantaged families, the Child Care Benefit and Child Care Rebate should be combined into a single payment to parents (or to ECEC Centres). This payment should have the following features as recommended by Australia's Future Tax System Review (2010):

- a high rate of subsidy for low-income families that covers most of the costs of childcare (up to 90 per cent). This would involve a smaller co-payment for low-income families

- coverage of the full costs of childcare for at-risk children and children facing multiple disadvantages, without their parents meeting the work, training or study participation requirements.

The 90 per cent subsidy target should be met for all low-income families irrespective of the number of children they have placed in childcare. Creating a single payment with these special features would increase affordability for many low-income families and, as it would reduce the level of subsidy for higher income groups, would go a substantial part of the way towards paying for itself.

## Costs of implementing this recommendation

The Brotherhood has estimated the cost of combining the CCB and CCR into one payment with features designed to assist disadvantaged families. Estimating the cost depends on assumptions made about the cost of childcare per child. This is because the Henry Tax Review target of a subsidy equal to 90 per cent of childcare for the most needy (and a base rate of 35 per cent for all parents) increases as the underlying childcare costs increase.

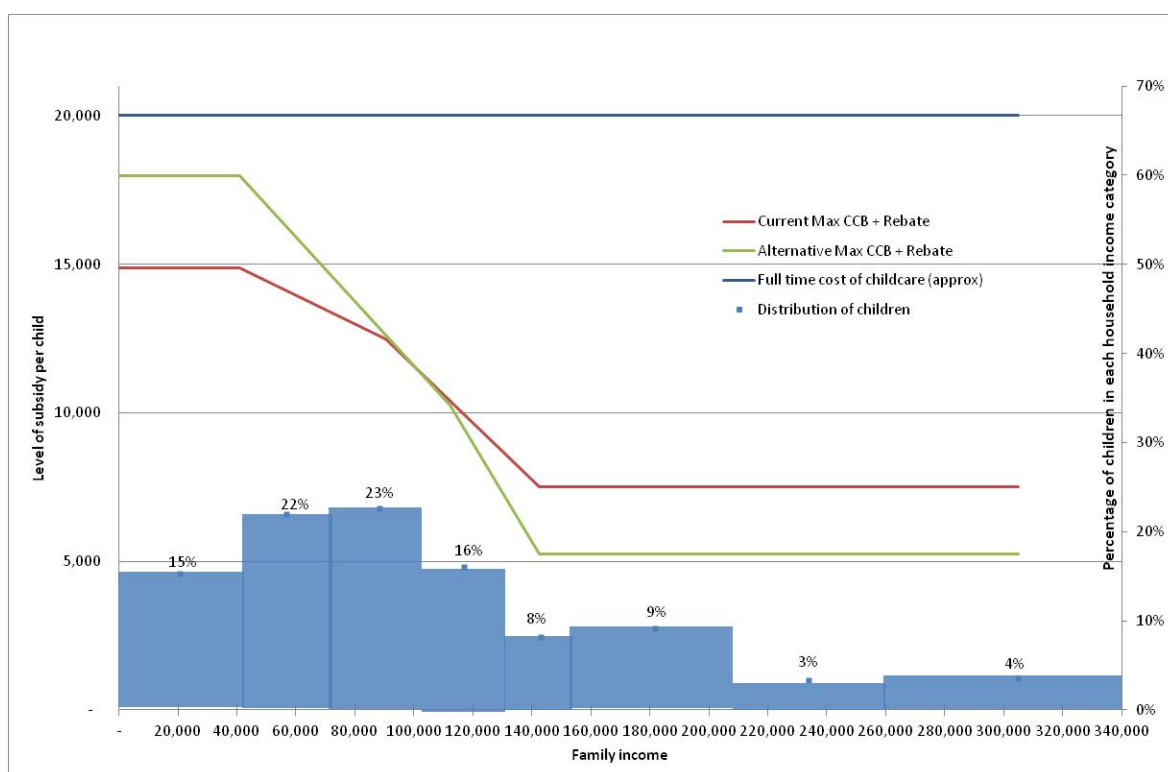
Based on an assumption of a cost of \$80 per child per day, CCB would increase to \$6.75 an hour in order to achieve the 90 per cent for the most needy. The Henry Tax Review's proposed reduction in rebate to 35 per cent of out-of-pocket costs will largely fund this.

The rebate would reduce from 50 per cent of the daily cost (up to \$7500 a year) to 35 per cent with a ceiling of \$5250. Under this scenario the overall cost of childcare to the government would increase by 3.3 per cent.

The drivers of this costing can be portrayed visually in Figure 1. This figure has two lines—a red one for the cost per child of the existing regime and a green one for the cost per child for the alternative (in this case the Henry Tax Review proposal). Under both schemes, the level of subsidy per child (left-hand vertical axis) is greatest for children from low-income households and falls to a base level as household income increases (denoted on the horizontal axis).

The blue columns in the figure describe the distribution of children in childcare across the different income groups (data sourced from ABS 2012). The value of each bar is read from the right-hand vertical axis (percentage of children in each income group). The cost of the Henry alternative can be decomposed into the cost of being more generous to the lower income households (where the green line is above the red line) less the savings from being less generous to the higher income households (where the green line is below the red line). The costs and savings are a function of both how far apart the lines are and also how many children fall into the relevant income categories. It should be noted that Henry Tax Review did not define 'low income'. For the purposes of this costing exercise low income families have been defined as families who currently qualify for the full rate of CCB.

**Figure 1: Current vs Henry alternative subsidy regimes, along with distribution of children in childcare across household income levels**



While the Henry model is broadly revenue neutral if childcare costs are \$80 per day, it is increasingly costly if childcare costs are higher. This is because higher childcare costs essentially shift the left-hand side of the green line up (in order to still meet the 90 per cent subsidy target) but the right hand side of the green line does not shift (that is, there are no consequent savings from higher income families).

## Recommendation 1:

### Make childcare more affordable for disadvantaged families

- Combine the Child Care Benefit and Child Care Rebate into one payment with the following features as recommended by Australia's Future Tax System Review 2010:
  - a high rate of subsidy for low-income families that covers most of the costs of childcare (up to 90 per cent). This would involve a smaller co-payment for low income families
  - coverage of the full costs of childcare for at-risk children and children facing multiple disadvantages, without their parents meeting the work, training, or study participation requirements.



## **4 Improving access to flexible, high quality ECEC for disadvantaged families**

The current funding model for ECEC in Australia can act as an impediment to the provision of casual care for disadvantaged families. Funding is directly linked to hours of care delivered which provides a strong incentive for ECEC service providers to fill places in order to maximise income from parent and government subsidies. The current funding thus creates a service model in which the financial viability of a service is dependent on filling all places during all hours of operation. ECEC Centres have fixed costs and are naturally keen to maximise their income during the period they are open.

As a result, offering places on a short-term, infrequent or variable days/hours basis is inconsistent with good business practice to support financial viability. The demand for good quality childcare is high and so it is possible for a service to fill its places with full-time or regular part-time users, leaving no spare capacity to accommodate occasional users.

Governments subsidise various models of occasional childcare. These occasional-care models rely on direct subsidy from government to pay the unit cost of places during the periods that they are not fully utilised.

A similar subsidy or financial incentive could be provided to Family Day Care services which are capable of providing care at short notice and care outside standard operating hours to children of disadvantaged families. This would assist, for example, a mother who is offered a work shift at short notice and has had no time to organise care in advance. Having access to a Family Day Care service for her child would assist her to take up this paid work opportunity. Having access to Family Day Care services outside standard hours care would assist shift working parents such as police officers, nurses and people working in hospitality. These arrangements would obviously need to be sensitive to the needs of the child to receive continuity of care.

In providing this subsidy, the government would be increasing the capacity for Family Day Care services to meet the needs of disadvantaged families working in casual, insecure and/or shift work. Providing a subsidy to Family Day Care services would also be cost effective as their care can be available 24 hours and there are very few childcare centres that are open outside standard operating hours for shift workers.

Providers of Family Day Care have also found it increasingly difficult to deliver high quality, accredited programs because of the low level of operational subsidy. In some local government areas of high need, where councils are unwilling to run programs or provide subsidies, Family Day Care programs have ceased to operate altogether. Increasing costs including staff costs and the requirements of running a quality program are undermining the capacity of not-for-profit Family Day Care providers to meet the need and fill gaps left by the withdrawal of local councils.

For example, the Brotherhood's own program in Craigieburn which provides Family Day Care to 234 families has to be supported with donor funds to the tune of \$88,000 per year.

Another undesirable consequence is that in local government areas where councils have withdrawn services, such as in the City of Yarra in inner Melbourne, private Family Day Care services are

springing up which do not meet the required standards and close before they face annual accreditation, only to re-emerge as a new service under another name.

There is an urgent need to increase the operational subsidy to accredited providers to ensure the viability of high quality Family Day Care services.

## **Recommendation 2:**

### **Increase the flexibility of Family Day Care and ensure the sustainability of high quality, accredited Family Day Care programs.**

- Provide a financial incentive for Family Day Care services to provide care at short notice and care outside standard operating hours for disadvantaged families working casual, insecure or shift work
- Increase the operational subsidy for Family Day Care to ensure the sustainability of high quality, accredited programs.

## **5 Assisting vulnerable or at risk children**

Children at risk of neglect and abuse are a highly vulnerable group who have much to gain from access to high quality ECEC. The benefits to developmental outcomes and school readiness, particularly for disadvantaged children, are well understood. In addition, access to affordable-high quality ECEC provides a range of additional protective benefits for children at risk of neglect. The former Department of Education, Employment and Workplace Relations noted these as follows:

- The amount of time the child spends in the risk environment is reduced.
- The amount of time the child spends in a stable and developmentally beneficial environment is maintained or increased.
- The child remains 'visible' in the community and opportunities to link the family with other appropriate services are increased.
- The parent/carer has an opportunity for respite or to seek assistance from other agencies such as health and family support services (DEEWR fact sheet)

Special Child Care Benefit (SCCB) is intended to improve access to childcare services for families experiencing temporary financial difficulties and for children at risk of neglect or abuse.

SCCB covers the gap between the other subsidies (CCB and CCR) and the full cost of care, so that vulnerable families do not have out-of-pocket costs or, where parents do not meet the work requirements for CCB and CCR, SCCB can meet the full cost of care. However, eligibility for SCCB is largely restricted to cases where a child is at risk of serious abuse or neglect or where families are experiencing temporary hardship and is a time-limited benefit.

Child protection services in most states and territories have early intervention services to identify vulnerable families and refer them to services that can support them and prevent abuse and neglect. In Victoria the networks of services charged with identifying and referring vulnerable families are called Child FIRST agencies. The Brotherhood has had reports from practitioners within Child FIRST agencies that having access to SCCB and affordable, stable, high quality ECEC can be extremely important and supportive for vulnerable families and can help prevent instances of abuse and neglect.

However, the Brotherhood has also had reports from staff at ECEC Centres that they are reluctant to make applications for the SCCB. The main reasons for this reluctance are:

- **The eligibility criteria for the SCCB are not clear.**

To be eligible, children must be 'at risk of serious abuse or neglect'. All forms of abuse and neglect are damaging to children's development and could be regarded as 'serious' yet the official guidelines for the SCCB refer to being at risk of 'serious' abuse and neglect.

It is not clear whether early intervention, that is *preventing* instances of child abuse or neglect, is part of the intention of SCCB. Arguably, it should be. If this is the goal, the eligibility criteria should be broader than children who are 'at risk of serious abuse or neglect' and should reflect the aim to prevent abuse or neglect.

Simplifying the SCCB eligibility criteria would assist ECEC centres to provide better care for vulnerable and at-risk children. This could be achieved by simplifying the official guidelines which currently run to thirty-six pages. The Brotherhood has also had reports that staff at ECEC Centres find the assessment process complex and confusing. Arrangements should be reviewed to make sure that the most appropriately qualified agency undertakes the eligibility assessment for this payment.

- **Centres find the SCCB application process too complex and too time intensive for their staff.**

SCCB is a strictly a time-limited benefit: every 13 weeks the ECEC Centre must reapply for approval of payment of the benefit. Most instances of children being 'at risk of neglect or abuse' last much longer than 13 weeks. To require ECEC providers to undergo a lengthy administrative process every 13 weeks is unrealistic, especially as they risk potentially losing the subsidy and having to exclude the child from using the centre. This acts as a disincentive for centres to facilitate access for these children.

Reducing the complexity of the application process for the SCCB would assist ECEC Centres to provide care for this group.

- **There are limits on the proportion of care for which services can approve SCCB.**

The total amount of SCCB (for both children at risk and families facing hardship) that a centre can approve in one quarter is normally limited to 18 per cent of the total CCB paid to the service. This 18 per cent cap should be removed.

- **Children who are at risk may require additional levels of care from the ECEC Centre.**

Children at risk may have complex needs. For example, sometimes they exhibit challenging behaviours that require specialist advice or higher staff ratios for a period of time. The level of SCCB should be increased to recognise the additional costs associated with providing ECEC to children with complex needs.

- **Across the ECEC sector there is variable knowledge about the existence of the SCCB and the way that it works in general.**

The Brotherhood has had reports of misunderstandings across regions in relation to the 13-week limit, the 18 per cent cap and who can provide support to SCCB applications. A targeted education campaign is recommended for centres and at-risk families regarding the help that is available

through SCCB to meet the costs of childcare for these families. This could also be targeted to particular communities and other services such as maternal and child health that provide information to families.

### **Recommendation 3:**

#### **Assist vulnerable and at-risk children to access childcare by reforming the Special Child Care Benefit**

- Simplify the eligibility criteria for the Special Child Care Benefit so that ECEC Centres have a better understanding of the availability of the benefit.
- Review the assessment process to ensure the most appropriately qualified Commonwealth agency undertakes eligibility assessment for the SCCB.
- Reduce the complexity of the application process for the Special Child Care Benefit for ECEC Centres.
- Increase the level of the Special Child Care Benefit to recognise the additional costs for ECEC Centres in providing care for children with complex needs.
- Remove the 18 per cent cap on the Special Child Care Benefit as a percentage of the total Child Care Benefit payable to centres.
- Run a targeted education campaign for ECEC Centres and at-risk families outlining the assistance available through the Special Child Care Benefit.

## **6 Models of care that specifically assist disadvantaged children and families**

Disadvantaged families often have multiple and complex needs which can benefit significantly from the linkage or integration of various service streams. Although there are barriers to improved service alignment, there is good evidence that integration results in improved access and convenience for consumers, which in turn results in improved service effectiveness and efficiency.

For families struggling with disadvantage, it is considered especially important to join together the various education, health and community services so that children and families can engage with the key services they need.

The Sure Start Program in the United Kingdom and similar international programs have been heavily influenced by this joined-up, place-based approach to service delivery, particularly for highly disadvantaged communities. Despite initial investments (e.g. by the Victorian Government and others) in the development of Integrated Early Childhood Development services, considerable additional investment is required in the early years area to support joined up local service provision.

This is particularly true in areas such as outer urban growth corridors where key social infrastructure is often lacking. Children in these developing communities need to be supported to achieve positive outcomes and their parents need to be better supported to raise their children and to access educational and employment opportunities. In growth corridors, building new social infrastructure such as integrated child and family centres can also provide a powerful mechanism

for local communities to build critical social capital through community participation in local decision-making processes.

Building on the initial success and lessons of the Doveton College in Victoria, there is now a compelling opportunity for the Commonwealth Government to fund trials of state and national significance in highly disadvantaged areas including some growth corridors. Quality integrated child and family centres or 'hubs' can provide the 'right mix of services at the right time' to both children and families by offering co-located and co-ordinated health, welfare, counselling, and parenting skills, simultaneous with the provision of employment services including training, pre-employment and placement support.

#### **Recommendation 4:**

##### **Support more joined-up, place-based approaches to service delivery for families in disadvantaged communities**

- Trial integrated child and family centres/early years hubs in disadvantaged communities with the following features:
  - programs to build the capacity of disadvantaged parents to meet the development needs of their children during their first two years of life;
  - capacity to link disadvantaged children and families to universal services
  - assistance for the workforce participation of parents.

## **7 Assisting disadvantaged children and families to achieve better outcomes**

From a wider economic perspective, quality early childhood learning and care can provide real cost savings to the community, especially in the areas of health, welfare and justice. This is particularly the case when quality ECEC services are provided for disadvantaged children and their families.

The National Quality Framework, which was developed by the Coalition of Australian Governments and based on persuasive research evidence, affirms this view. These national reforms included higher level qualifications for staff and an increase in staff-to-child ratios, which the Brotherhood of St Laurence supports. Any delays in implementing or scaling back these reforms would have a major negative impact on disadvantaged children and families.

Lack of formal training and low staff-child ratios limit the capacity of early childhood workers to fulfil both their duty of care and their potential to enhance and enrich a child's cognitive and non-cognitive learning and development. The core concept that 'quality matters' is agreed by all major international stakeholders, and refers to the fact that the combination of high staff to child ratios, and high staff qualifications makes a real and lasting difference in the life of the child.

Researchers at the Centre on the Developing Child at Harvard University (2007) found that centre based programs that have positive outcomes are characterised by:

- highly skilled staff
- small class sizes

- high adult–child ratios
- language rich environments
- age appropriate curricula
- warm responsive interactions between staff and children
- high and consistent levels of child participation.

An example is the High/Scope Perry Preschool project which was developed in Ypsilanti, Michigan, in the United States and has been running for some 40 years. This project targeted high risk African-American children and focused on cognitive and social development. Stated policy implications include the importance of a high quality education approach, using well qualified and compensated staff, high adult-child ratios, an active learning approach and a home visiting program designed to engage parents in their children's learning. Its outcomes in terms of school and academic success, employment rates and income, family stability and criminal behaviour are impressive and cost–benefit analyses show a return of \$7 for every \$1 of investment.

### **Recommendation 5:**

**Continue to implement the National Quality Framework, including higher level qualifications for staff and an increase in staff to child ratios to assist disadvantaged children and families to achieve better outcomes.**

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