

A Joint Submission between the National
Rural Women's Coalition and the Isolated
Children's Parents Association of Australia
| February 2024

Early Childhood
Education and
Care (ECEC). |
Productivity
Commission inquiry
into the Sector.

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Preamble

The National Rural Women's Coalition

The National Rural Women's Coalition (the NRWC) is a grass roots organisation, established in 2002, that works to support and grow vibrant rural, remote, and regional communities throughout Australia. We are a coalition of five rural alliances - the Australian Local Government Women's Association, Australian Women in Agriculture, National Rural Health Alliance, Women in Seafood Australasia and Transport Women Australia Limited.

For over twenty years, we have worked to ensure better social, economic, and environmental outcomes for women in rural townships, in rural communities and in primary production throughout Australia.

The NRWC provides a collaborative, powerful national voice for women living in Rural, remote, and regional Australia through:

- Representing the diverse views and voices of women in rural, remote, and regional Australia;
- Providing advice to the Australian Government on policy issues relevant to the views, circumstances and needs of rural women; and
- Contributing to building a positive profile of rural women, their achievements, and their issues.

We believe it is important that the unique views of rural women who reside in the numerous rural, remote, and regional communities throughout Australia as farmers, businesswomen, community leaders and volunteers, have substantial input into consultations about their communities, industries, needs and issues, including any matters relating to women's rights, gender equality and discrimination.

Isolated Children's Parents' Association of Australia (ICPA Aust)

Preamble

The Isolated Children's Parents' Association (ICPA Aust) is a voluntary, apolitical, national parent organisation which advocates on behalf of its members for equity of access to an appropriate education for all geographically isolated children and students, from early childhood through to tertiary. The majority of the 2000 plus member families of the Association reside in geographically isolated areas of Australia, and all share a common goal of achieving equitable access to education for their children and the provision of services required to achieve this. Students whose family home is in rural and remote Australia, often live vast distances from services required to support the education of these students.

Background

The Australian Government recognises that Early Childhood Education and Care (ECEC) is an essential part of Australia's education system and is integral to Australia's economic prosperity as a powerful lever for increasing workforce participation. The Government is committed to identifying solutions that will chart the course for universal, affordable ECEC – in the great tradition of universal Medicare and universal superannuation.

Participation in quality ECEC has important developmental, social, and educational benefits for Australian children. It can assist with positive early childhood development and provides a foundation for our children's future well-being and success.

Cost and availability continue to be barriers to accessing ECEC, and for parents and carers achieving their preferred level of workforce participation. The Government believes more accessible ECEC is one of the most powerful initiatives it can pursue for increasing workforce participation, particularly for women.

Governments make significant investments in ECEC which must be targeted, complementary and cohesive to maximise the educational and economic benefit in the most efficient way possible.

Findings from the Australian Competition and Consumer Commission Childcare Price Inquiry will inform and support this Inquiry.

In addition, the Government has committed to developing a Commonwealth whole-of-government Early Years Strategy, focused on the wellbeing, education, and development of Australia's children. Further, National Cabinet has asked Education and Early Years Ministers to develop a long-term vision for ECEC.

On 9 February 2023, the terms of reference were received, Pursuant to Parts 2 and 3 of the *Productivity Commission Act 1998*, Jim Chalmers Treasurer requested that the Productivity Commission undertake an inquiry into the early childhood education and care (ECEC) sector in Australia.

The terms of reference are broad with a focus on affordable, accessible, equitable and high-quality ECEC that reduces barriers to workforce participation and supports children's learning

and development. Further, National Cabinet has asked Education and Early Years Ministers to develop long term vision for ECEC. The commission was encouraged to consult with state and territory governments, the ECEC sector and Closing the Gap Early Childhood Care and Development Policy Partnership on matters relating to First Nations children, families, and services. The inquiry into ECEC encapsulates centre-based day care (CBDC), preschools, family day-care, in-home care and outside school hours care (OOSHC). The Commission commenced this Inquiry on 1 March 2023.

Subsequently the Productivity Commission released the Draft report ‘A path to universal early childhood education and care’ in November 2023.¹

The final report to the Government is due by 30 June 2024.

The National Rural Women’s Coalition (NRWC) and Isolated Children’s Parents Association of Australia (ICPA (Aust)) welcomes the opportunity to make a submission on the unique experiences, challenges, and solutions that rural, remote, and regional (RRR) women, parents and families accessing Early Childhood and Care (ECEC) services have. NRWC and ICPA (Aust) welcome the opportunity to create quality life outcomes for rural, remote, and regional children who are at times, left behind compared to their urban counterparts.

Introduction

The advances in neurobiology and neuroscience have allowed for us to understand how remarkably complex the human brain is. The formation of the brain occurs the fastest in the formative years from zero (0) to eight (8) years of age. These formative years become the blueprint for the child’s future. What occurs in these crucial years has a lifelong impact on the neurobiology of the brain and development. Experiences in the formative years can be depriving, stunting, or enriching to healthy development.²

¹ Australian Government, Productivity Commission. (23 November 2023) ‘A path to Universal early childhood education and care’ Draft report. <https://www.pc.gov.au/inquiries/current/childhood/draft>

² Rank M, R., & Hirschl T, A. (November 1999). National Council on Family Relations. The Economic Risk of Childhood in America: Estimating the Probability of Poverty across the Formative Years. *Journal of Marriage and the Family*. Vol 61. No 4. (Nov 1999; pp. 1058 – 1067); Tierney A, L., Nelson C, A., 3rd. Brain Development and the Role of Experience in the Early Years. *Zero Three*. 2009 Nov 1;30(2):9-13 and UNICEF

It is imperative to all children's development and wellbeing that developmental psychology and neurobiology of the brain be at the forefront of decision makers minds for ECEC reform.

³ This inquiry is specifically looking at care of children in the formative years, further decisions made now on ECEC will impact future generations. United Nations Children's Fund (UNICEF) Executive Director Catherine Russell recently stated this clearly:

'The legacy of our times hinges on your dedication and the choices we make today. At this turning point, we must set a course of action that guarantees a sustainable future for every child in every country around the World' ⁴

Convention on the Rights of the Child (CROC)

Further, the Convention on the Rights of the Child (CROC)⁵ ratified by Australia on 17 December 1990 enshrines children's human rights protections. Of particular importance, Article three, (3) subsection three (3); Article Nineteen (19) subsection one (1) and Article twenty-nine (29) subsection (1) of the Convention on the Rights of the Child (CROC) state:

Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section, Progress on Children's Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children's Fund (UNICEF), New York, September 2023

³ Tierney A, L., & Nelson C, A., 3rd. (Nov 2009) Brain Development and the Role of Experience in the Early Years. *Zero Three*. Nov 2009 1;30(2):9-13; and Votruba-Drzal, E., Coley R, L., Maldonado-Carreño C., Li-Grining C,P., & Chase-Lansdale P, L. Child care and the development of behaviour problems among economically disadvantaged children in middle childhood. *Child Dev*. 2010 Sep-Oct;81(5):1460-74.

⁴ UNICEF Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section, Progress on Children's Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children's Fund (UNICEF), New York, September 2023.

⁵ *International Convention on the Rights of the Child*, New York, 20 November 1989. [UNTS: vol 1157. P3] Entry into force 2 September 1990 in accordance with article 49(1). Australia became a signatory on 22 August 1990 and Ratified on 17 December 1990.

Article 3

3. States Parties shall ensure that the institutions, services, and facilities responsible for the care or protection of children shall conform with the standards established by competent authorities, particularly in the areas of safety, health, in the number and suitability of their staff, as well as competent supervision.

Article 19

1. States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

Article 29

1. States Parties agree that the education of the child shall be directed to:

(a) The development of the child's personality, talents and mental and physical abilities to their fullest potential:

(b) The development of respect for human rights and fundamental freedoms, and for the principles enshrined in the Charter of the United Nations;

(c) The development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate, and for civilizations different from his or her own;

(d) The preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups and persons of indigenous origin;

(e) The development of respect for the natural environment.⁶

⁶ Ibid 5, Articles 3, 19 and 29.

Sustainable Development Goals (SDG) | Child related SDG Indicators

Referred to as an urgent call to action for member States, the 2030 Sustainable Development Goals (SDG) set achievable targets for ‘peace and prosperity for people, and the planet, now and in the future.’⁷ In September 2023, Australia reported on ‘Australia’s Progress on Children’s Well-Being: Centring child rights in the 2030 agenda.’⁸ This report is the progress of Australia on 48 child-related SDG indicators.

There are five (5) outcome areas of the 48 indicators, they are:

- 1. Survive and Thrive;**
- 2. Learning;**
- 3. Protection from Harm;**
- 4. Safe and Clean Environment; and**
- 5. Life free of poverty.**⁹

Australia has data on 31 of the 48 Indicators. **Australia has not provided data to the progress on Children’s Well-Being: Centring child rights in the 2030 agenda on the following:**

- **Early Childhood Development Index;**
- **Reading Proficiency;**
- **Violent Discipline;**
- **Child Labour;**
- **Female Genital Mutation;**
- **Intimate Partner Violence;**
- **Sexual Violence in Childhood (for both female and male children);**
- **Basic Hygiene;**
- **Safely Managed Drinking Water;**
- **Population in Poverty;**

⁷ United Nations General Assembly, ‘Resolution adopted by the General Assembly on 25 September 2015. (21 October 2015) 70/1. ‘Transforming our world, the 2030 Agenda for Sustainable Development.’

⁸ UNICEF Division of Data, Analytics, Planning and Monitoring. (September 2023) Data and Analytics Section. *Progress on Children’s Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children’s Fund (UNICEF)*. New York, September 2023. & United Nations Children’s Fund. (September 2023) *Australia: Benchmarking child-related SDGs*, UNICEF Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section. New York, September 2023.

⁹ Ibid 8.

- **Child Poverty;**
- **Children in Poor Households;**
- **Children in Households below PPP US\$2.15 (AU\$3.31)** ¹⁰

UNICEF recommends for Australia to reach the targets set for 2030 SDG, in six years' time, that Australia needs urgent improvement and to accelerate in the following three areas:

- Essential Health Care Services;
- Completion Rate of Upper Secondary Education; and
- Safely Managed Sanitation. ¹¹

Capturing and using data to inform ECEC

The UNICEF Multiple Indicator Cluster Surveys (MISC) which significantly improves the availability of a data on monitoring children's wellbeing, has never been completed by Australia. The MISC looks at the 48 child-related SDG indicators under the five principles. ¹²

Further, page seventeen (17) of the Productivity Commissions draft 'A path to universal early childhood education and care,' noted:

'Despite these substantial collections (of data) there are many questions unable to be answered.... Not enough is known about the ECEC experiences that make a difference to children, including the influence of staff qualifications or ratios on children's outcomes. Government have not set a clear agenda for research into ECEC to address these and other knowledge gaps.' ¹³

¹⁰ Ibid 8.

¹¹ Ibid 8.

¹² Ibid 8; and UNICEF *Multiple Indicator Cluster Surveys (MISC) (2024)* [Home - UNICEF MICS](#) .

¹³ Productivity Commission (November 2023) *A path to universal early childhood education and care*, Draft Report, Canberra, November. p 17; and

It appears that crucial data relevant to the gradual and careful implementation of ECEC at the formative years of children’s lives, along with the reporting obligations to UNICEF for *Progress on Children’s Well-Being: Centring child rights in the 2030 agenda* are missing. **This important data should be a priority to have a base line and to inform the gradual and careful implementation of a path to universal ECEC.** Children’s voices and experiences should be part of the qualitative data. ¹⁴

Questions remain, if you do not have the data or research, how can Australia possibly implement informed quality universal ECEC? Especially in our most rural, regional, and remote areas, where there are already ‘thin markets’ which are not able to meet the demand for supply. ¹⁵

Further, of the three (3) areas where Australia needs to accelerate, ¹⁶ area (2) completion rate of upper secondary could be linked to the experiences of children in formative years and ECEC, research in this area could assist in evidence to investigate this hypothesis. The Australian Government could have households complete the UNICEF Multiple Indicator Cluster Surveys (MISC) to obtain data on the wellbeing of children regarding the 48 child-related SDG indicators and assist with Australia reaching the 2030 SDG targets for children. **Further, the Productivity Commission should consider consistency of data aligning with the five (5) outcomes of the 48 indicators;**

1. Survive and Thrive;

2. Learning

3. Protection from Harm

4. Safe and Clean Environment; and

¹⁴ UNICEF Division of Data, Analytics, Planning and Monitoring. (September 2023) Data and Analytics Section. *Progress on Children’s Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children’s Fund (UNICEF)*. New York, September 2023. & United Nations Children’s Fund. (September 2023) *Australia: Benchmarking child-related SDGs*, UNICEF Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section. New York, September 2023.

¹⁵ Productivity Commission (November 2023) *A path to universal early childhood education and care*, Draft Report, Canberra, November. p 62.

¹⁶ United Nations Children’s Fund. (September 2023) *Australia: Benchmarking child-related SDGs*, UNICEF Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section. New York, September 2023.

5. and Life free of poverty into ECEC policy for consistency with the SDG and International Law.¹⁷

This submission acknowledges that the draft ‘A path to universal early childhood education and care’ does differentiate Centre based day care (CBDC), preschools, family day-care, In-Home Care (IHC) and Outside of School Hours Care (OOSHC) and does provide some data on ECEC. However, it appears that Australian Bureau of Statistics (ABS) data is outdated and does not differentiate between CBDC, Family Day Care, Pre Schools, IHC or OOSHC. Reform should consider differentiation between the different forms of ECEC to properly capture data related to each specific form of care.¹⁸ Further, the most recent Australian Bureau of Statistics (ABS) report on ECEC was released six years ago on 23 April 2018.¹⁹

Investment and Support in the Formative Years

International Labour Organisation and UNICEF report ‘*More than a million reasons: The urgent need to build universal social protection for children*’²⁰ provides evidence which indicates when member states invest more support for children in the formative years, this appears to correlate with less spending in older years or youth. UNICEF refers to this as ‘front end spending’ and ‘back-end spending.’ If you spend less in the formative years, you end up spending more in older years or youth ‘the back end’ and vice versa.²¹ Currently most of the expenditure comes later in the child’s life course, up to twenty-three (23) years of age.²²

¹⁷ Ibid; and UNICEF Division of Data, Analytics, Planning and Monitoring. (September 2023) Data and Analytics Section. *Progress on Children’s Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children’s Fund (UNICEF)*. New York, September 2023.

¹⁸ Australian Bureau of Statistics (ABS). (30 March 2023) *Preschool Education Statistics about preschool education, including enrolment, attendance, fees, and service providers*. Reporting period 2022. <https://www.abs.gov.au/statistics/people/education/preschool-education/latest-release>

¹⁹ Australian Bureau of Statistics (ABS). (23 April 2018) *Childhood Education and Care Australia Information on children aged 0-12 years and their families, including use of formal and informal care*. <https://www.abs.gov.au/statistics/people/education/childhood-education-and-care-australia/jun-2017>

²⁰ International Labour Organisation (ILO) & United Nations Children’s Fund (UNICEF). (2023) *More than a billion reasons: The urgent need to build universal social protection for children*. Second ILO-UNICEF report on social protections for children. Geneva and New York.

²¹ Ibid p 66.

²² Ibid p 65.

Further this report states Australia should implement a location-based increment into social protection for children:

‘When geographical remoteness negatively affects families purchasing power because of limited markets or additional transaction costs location-based increments should be considered.’²³

Universal Early Childhood Education and Care

International jurisdictions such as Sweden and United States of America (USA), have introduced universal childcare reform, which has involved a childcare allowance to be paid to the parent to choose their preferred form of care for their child and give every child the right to have access to 30 hours per week of subsidised care, without distinction.

Sweden is known as the ‘international gold standard’ for childcare, with ninety percent (90 %) of young children between eighteen (18) months and five (5) years in care. Female work participation has increased by 80 %.²⁴ Quality of care was reduced as more families accessed care; however, quality of care became improved once this deficit of care was highlighted. In the USA, they found increased income (although this was debated) and less criminal justice interactions and better health, which benefited the Governments budget by saving money.²⁵ Sweden and USA provided free meals and equipment, fee waivers and ‘childcare allowances.’²⁶ USA has discontinued the childcare funding, and this looks to disrupt three (3)

²³ Ibid 63.

²⁴ Stevens, B, K. (March 2021) The Unintended Consequences of Universal Child Care: Lessons from Sweden. Centre for Child and Family Policy. <https://www.ccfp.org/ccfp/the-unintended-consequences-of-universal-childcare-lessons-from-sweden>

²⁵ Executive Office of the President of the United States. Council of Economic Advisers. (January 2015) The Economics of Early Childhood Investment. https://obamawhitehouse.archives.gov/sites/default/files/docs/early_childhood_report_update_final_non-embargo.pdf

²⁶ Stevens, B, K. (March 2021) The Unintended Consequences of Universal Child Care: Lessons from Sweden. Centre for Child and Family Policy. <https://www.ccfp.org/ccfp/the-unintended-consequences-of-universal-childcare-lessons-from-sweden>

million children in childcare. This current USA childcare crisis impacts educators, families, and the economy.²⁷

Sweeden currently spends E\$20,000.00 per child in the early years, E\$15,000.00 per child in older years. Australia currently spends E\$12,000.00 per child in the early years and E\$16,000.00 per child in older years.²⁸ The optimal benefits are if ECEC investment is increased in the early years, the cost decreased in later years.

Australia is following international gold standard on universal child-care, however the term is not specifically defined in the draft 'A path to universal early childhood education and care.' The draft acknowledges universal is not defined.²⁹ The benefits of clarifying the principal term would be that all who are interacting with ECEC, would understand what the term universal means. Australia could also learn from countries who have established universal child education and care systems and policy in place.

Rural, remote and Regional Australia differentiated and specific ECEC support

ABS 2022 statistics on preschool enrolments state 334,440 students were enrolled in 2022. This was a 1.3 % decrease from 2021. Aboriginal Torres Strait Islander (ATSI) enrolments have increased by 2.7%. Extraordinarily little statistics are available specifically on rural, remote, and regional Australia. In one ABS publication there is one statistic in 2022, referring to 40% of remote and very remote preschool enrolments are ATSI children.³⁰ However, the plan for universal early childhood education and care provides some more specific details, one point four (1.4) million children were in Child Care Subsidy (CCS) approved ECEC services in 2022, 550,000 children were enrolled in preschool programs, of which 22 children out of 10

²⁷ Beebe, J. (17 January 2024) Prime for Overhaul: Policy Tools for solving the childcare crisis. Baker Institute: Centre for Public Finance (Report). <https://www.bakerinstitute.org/research/prime-overhaul-policy-tools-solving-child-care-crisis>

²⁸ International Labour Organisation (ILO) & United Nations Children's Fund (UNICEF). (2023) *More than a billion reasons: The urgent need to build universal social protection for children*. Second ILO-UNICEF report on social protections for children. Geneva and New York.

²⁹ Productivity Commission (November 2023) *A path to universal early childhood education and care*, Draft Report, Canberra, November. P 29.

³⁰ Australian Bureau of Statistics (ABS). (30 March 2023) *Preschool Education Statistics about preschool education, including enrolment, attendance, fees, and service providers*. Reporting period 2022.

in ECEC are from regional areas of Australia and one (1) in 100 are from remote and very remote areas.³¹

The large numbers of children in rural, regional, and remote Australia accessing ECEC strongly supports the need for location based ECEC support conducive to the challenges that rural, remote, and regional families and children face.

The NRWC and ICPA (Aust) would strongly advocate that rural, remote, and regional children should not be left behind and moving forward comprehensively included in all ECEC data and statistics. The NRWC and ICPA (Aust) advocate for children's ECEC data to be de identified and protected.

The NRWC and ICPA (Aust), agree with the International Labour Organisation (ILO) and UNICEF report '*More than a million reasons: The urgent need to build universal social protection for children*' that ECEC policy, should include specific location-based increments to support rural, remote, and regional (RRR) women, young women, children, parents and families who are integral to the agriculture, farming, associated businesses, business, community, and care economy of rural Australia.³²

Four Pillars of Reform | Availability, Accessibility, Inclusion and Flexibility

Availability

Accessing affordable early childhood education and care for families living in rural and remote regions has never been more concerning and is proving beyond the reach of many due to:

³¹ Productivity Commission (November 2023) *A path to universal early childhood education and care*, Draft Report, Canberra, November. P 8 & 9.

³² International Labour Organisation (ILO) & United Nations Children's Fund (UNICEF). (2023) *More than a billion reasons: The urgent need to build universal social protection for children*. Second ILO-UNICEF report on social protections for children. Geneva and New York.

- **lack of available services**
- **difficulty attracting and retaining staff**
- **inflexibility of service delivery programs**
- **high out-of-pocket costs**
- **uncertainty and inadequacy of funding for Mobile Early Childhood Services.**

Summary

Rural, remote, and regional ECEC issues fall into three broad categories.

1. Universal Access to Early Childhood Education and Care

The Commonwealth Government is committed to Preschool Reform Agreement 2022-2025.

- Affordability of and access to an early childhood education continues to impede the participation of some rural and remote children.
- The extension of Assistance for Isolated Children (AIC) Distance Education (DE) Allowance to include three and four-year-olds enrolled in an approved pre-compulsory early childhood education program would improve access and affordability.
- Flexibility in the use of school buildings and flexibility in the qualifications of staff would expand the number of accessible early childhood education programs.

2. Mobile Early Learning

Mobile Early Learning Services can be the ONLY early childhood service accessible to some rural and remote families.

- Funding of rural and remote Mobile Early Learning decreased under funding restructures and continues to be uncertain.
- No provisions for the establishment of new mobile early learning services are evident.
- Some rural and remote families have NO access to an early childhood service.

3. Childcare

A myriad of issues affects families educating and caring for their children in these areas.

ICPA (Aust) members continue to raise concerns about the inappropriateness of current delivery models for geographically isolated families and difficulties associated with accessing early childhood education and care in rural and remote areas.

The Commonwealth Government's In Home Care (IHC) program is part of the child care package and could provide flexible care that supports families' workforce participation and child care requirements where other options are not available or appropriate.

- IHC can be the ONLY childcare option for many rural and remote families.
- IHC program guidelines are inflexible and consistently disadvantage rural and remote families.
- Distance education school rooms require a supervisor. IHC guidelines specifically preclude receipt of the Childcare Subsidy for supervision of distance education.
- Workforce participation of rural and remote families with children on distance education is not supported by the IHC program.
- Changes to criteria of Working Holiday Maker and Temporary Work (Skilled) Visas could help alleviate workforce shortages.
- A National Working with Children Check would improve the ease of transitioning childcare and education staff between States/Territories

RECOMMENDATION ONE

The establishment of a stand-alone 'Rural, Remote and Regional Early Childhood Section/Branch' within the Department of Education, encompassing all early childhood education and care such as preschools and kindergartens, mobile early learning services, Long Day Care and In Home Care to provide for the unique needs of rural and remote families.

Case Study:

'In South Australia, the Remote and Isolated Children's Exercise (RICE) provide an outback childcare program that enables families to receive short-term childcare in the family home when they need childcare during busy times or if they need respite or emergency care.

Currently this program does not attract any Government support or funding, resulting in RICE having to rely on community donations or asking families to pay an unsubsidised, full rate hourly fee for the service. The childcare Scheme (CCS) can only be received when a child is enrolled through a centre-based childcare facility or through the In-Home Care (IHC) program which is currently unavailable for RICE member families due to provider limitations within South Australia.

The cost to access childcare without the CCS is an unaffordable option, leaving families to try find other ways to manage childcare needs. Families living in rural and remote areas have no real option of childcare like community creches, nearby centres or family or friends who could step in. Living on a remote cattle station 1000km from Adelaide makes asking your mum, sister or best friend to step in and help for the day unpractical and often impossible. With the recent report that indicated the Federal Electorate of Grey (which encompasses 90% of South Australia, including all of its rural and remote areas) has the worst access to childcare in the country, just finding a facility, let alone accessing it, is a difficult undertaking in itself. The Outback Childcare service needs to be made affordable for families as well as being viable for RICE to manage and administer.'

RECOMMENDATION TWO

Consideration of the uniqueness of childcare needs and childcare services in rural and remote communities regarding these families accessing the Childcare Subsidy. (CSS)

Urgently implement ILO and UNICEF recommendations for specific location-based increments to support rural, remote, and regional ECEC in Australia.

More facilities for preschool education in rural, remote, and regional communities

The flexible use of school buildings in small rural towns to include preschoolers, more preschool distance education places and more facilitators would assist in making ECEC accessible. This is required to ensure that all students have access to the required 15 hours per week preschool education. Facilitators should include qualified primary school teachers and diploma qualified educators where Early Childhood teachers are difficult to access. Students commencing formal schooling need to be school-ready, especially as Early Learning Languages Australia (ELLA) and Science, Technology, Engineering and Maths (STEM) subjects in the form of Early Learning STEM Australia (ELSA) have also been introduced to the preschool curriculum. Rural and remote students will lag their urban peers from the very beginning if preschool has not been experienced in their early years.

RECOMMENDATION THREE

Dispensations be made to improve access to preschool facilitators and school facilities in rural, remote, and regional areas.

Mobile Early Childhood Services in rural, remote, and regional areas

For many years, various mobile children's services have delivered the important services of being able to provide social contact, professional advice, mobile early learning services and early childhood programs.

They play a vital role in offering developmental opportunities for children and interactions with parents in small rural communities and outlying, often very isolated, areas. In many cases, these services provide the only face- to-face interaction for children of similar ages. Flexibility and certainty of funding for these services is vital in providing the much-needed socialisation component of early childhood programs for these communities. Adequate funding needs to continue for mobile early learning services and early education programs for rural and remote children as well as funds and support for the creation of new services in geographically isolated areas where early childhood services do not exist. The following issues need to be addressed:

1. Mobile early learning services no longer funded under Budget Based Funding (BBF) were transitioned to Indigenous Advancement Strategy funding or to new Childcare system funding. Neither model sufficiently caters for the unique services provided by mobile early learning services to rural and remote families, especially those services which do not include childcare;
2. No provision appears to be available for the establishment of new mobile early learning services; and
3. Funding continues to be inadequate and uncertain.

RECOMMENDATION FOUR

Mobile early learning services in rural, remote, and regional areas, be supported with adequate and secure funding.

Coordination of mobile early learning services to allow equitable access to rural, remote, and regional areas.

Inclusion of mobile early learning services in data collection.

In Home Care (IHC)

Families living in rural and remote Australia, who can provide accommodation, previously found the In-Home Care (IHC) program to be an affordable option when it came to accessing childcare. However presently IHC is not meeting the needs of families, with the following four main concerns continually raised by our members:

- That the IHC program needs to remain accessible for all rural and remote families who have no other childcare options.
- IHC educators should be allowed to supervise distance education where face-to-face schooling is not available as teachers are not present to look after the children.
- The difficulty of finding suitably qualified people to employ in their homes to provide childcare or to teach the children of rural and remote families who must be educated by distance education.
- Fees charged by IHC providers are rising and changing often without explanation.
- The limitations of the IHC National Guidelines which require educators to be at least 18 years of age, despite either working towards a minimum Certificate III level qualification or already obtaining the qualification. This limits the opportunity for young workers to be gainfully employed following graduation.

RECOMMENDATION FIVE

- **That an In-Home Care (IHC) program, or sub-program thereof, be established specifically for rural, remote, and regional families.**
- **That amendments be made to IHC Guidelines to cater for the needs of rural, remote, and regional families.**
- **That Childcare Subsidy decisions make specific dispensation or consideration of IHC circumstances.**
- **That a specific IHC program be established for rural, remote, and regional families who must provide board and lodging for their educators to reduce families' gap payments for IHC.**
- **That a flexible approach be taken with respect to the required qualifications for rural, remote regional teachers/educators.**
- **That IHC educators be allowed to supervise distance education where face-to-face schooling is not available as teachers are not present to look after the children in distance education schoolrooms.**
- **A review of and structure provided around the fees charged to families and educators by IHC providers.**
- **The amendment of the IHC National Guidelines to allow graduates with a Certificate III in Early Childhood Education, or equivalent, who are less than the age of 18 years to be eligible for positions of employment through the IHC program.**

ECEC staffing issues rural, remote and regional Australia

The next section of this submission is informed by sector providers and women, parents and families in rural, remote, and regional Australia. They provided insight into the following six topics, expanded below:

- 1. Filing soaring ECEC staff vacancies;*
- 2. Upskilling and educating ECEC staff;*
- 3. Providing quality care to all children;*
- 4. Child protection;*
- 5. Meeting families needs; and*
- 6. Inconsistent funding and compliance regimes.*

1. Filing soaring ECEC staff vacancies

The current vacancy rates for educators in ECEC in Australia has been soaring, now at 5,000 and 3,000 for Early Childhood Teachers. (ECT) This is likely to be exacerbated with ECEC reforms and universal childcare. 93% of ECEC staff identify as female, 28 % are from culturally and linguistic diverse (CALD) backgrounds and only three percent (3%) identify as Aboriginal Torres Strait Islander. (ATSI) 24 % of staff are employed on casual contracts.

More permanent part time contracts should be offered to retain and keep rural, remote, and regional women with secure employment in a skill shortage area. Women who make up 93% of the ECEC workforce, should be afforded entitlements of permanent part time.

RECOMMENDATION SIX

ECEC employers should be strongly encouraged to offer permanent part time employment instead of casual employment.

A target should be introduced to reduce ECEC casual employment from 24% to less than 10% casual employees by 2025.

First Nations Women and young women should be supported in ECEC employment, to increase the First Nations ECEC workers to 8 % by 2025.

Working Holiday Maker Program: Working Holiday Maker Visas, DAMA visas and the Shortage of Distance Education Tutors and Nannies in Rural and Remote Australia

Due to geographical isolation, there is a distinct lack of Australian workers, including qualified childcare and educational workers, who are willing to undertake work where remoteness is an issue. It is extremely difficult to attract and retain Australian child carers, home tutors (distance education tutors) and teachers to rural, remote, and regional areas. Frequently, the only people prepared to travel and work in remote areas are overseas travellers looking for a cultural exchange experience and our rural, remote, and regional members rely on the employment of overseas workers to fill these positions. While these workers are a valuable resource, under the conditions of their visas they are not eligible for a second- year visa if they undertake employment in childcare in rural and remote areas. Plant and animal cultivation, fishing and pearling, tree farming and felling, mining and construction are currently the specific fields of work that qualify an applicant for a second-year visa. Measures include:

1. extending the eligibility for a second-year visa to include childcare and education (ECEC); and
2. incentives for backpackers to holiday and work in rural, remote, and regional Australia.

The Second Year Working Holiday visas 4170F2 and 4621F3, are not available for distance education tutors/teachers or nannies from overseas in rural, remote, and regional areas, despite being rural work.

However, with recent developments in regional areas of Australia, second-year visa applicants could be accepted there, on the 462 Working Holiday visa, if having worked for six months in agriculture, tourism, or hospitality the previous year. Also, in regional areas of Australia, if working for six months for one employer on a Working Holiday Maker visa 417, permission can now be granted to stay another six months with that employer. If childcare or distance education supervision were eligible as Specified Work, this would help provide workplaces for distance education tutors in other rural, remote, and regional areas if the same conditions apply as for other second-year visa seekers. In the distance education schoolroom, 12 months' support

would be more beneficial than just six months to support the importance of continuity and consistency.

At times, overseas couples wish to work on a rural or remote property; both would enjoy the cultural experience and one partner is able to work with the livestock, orchards etc., however the other partner may wish for a less physical type of work. They would be unable to work in the distance education schoolroom or assist with childcare on the property to gain eligibility for a second-year visa as this is not on the 'Specified Work' list. Making the second-year visa accessible to nannies and distance education tutors under agriculture would provide a better solution for rural families seeking to employ staff and a better experience for overseas workers who wish to remain with one employer.

Designated Area Migrant Agreement (DAMA) Visa Applications

ECEC sector provider's state:

'Designated Area Migrant Agreement (DAMA) visa applications³³ for rural, remote, and regional areas are available, however this sponsorship process includes the recipient receiving increased earnings by up to ten thousand dollars. (\$10,000.00)

It is difficult, as you cannot put visa holders in management, if they do not have the qualifications, but if the visa requirements are for management position only, then other staff rightly so, become disgruntled. This is difficult as other staff then want the same entitlement. There is no equity for all staff when staff who have more qualifications and experience are paid less than DAMA visa recipients.

ECEC Sector providers state 'consideration must be given to centres who sponsor CALD (Culturally and Linguistically Diverse) educators, whom they deeply value, but where English is their second language, this requires extra

³³ Australian Government. Home Affairs; Designated Area Migration Agreements. (DAMA) <https://immi.homeaffairs.gov.au/visas/employing-and-sponsoring-someone/sponsoring-workers/nominating-a-position/labour-agreements/designated-area-migration-agreements> last updated 21 December 2023.

training including with children and families.’ The requirements are onerous, with just one out of ten applications being successful.’

One regional ECEC provider put it quite simply :

‘Just to get an educator, it’s a lot, it’s also unreachable.’

Further, DAMA visa’s, can require recipients to be away from their family of origin for years at a time, for example one DAMA Visa recipient has two children and a husband who she has not seen for years, and works two jobs to be financially secure. This may not be sustainable.

Volunteer Work Activities

The removal of eligibility of volunteer work activities in application for a Second Year Working Holiday visa as of 1 December 2015, compounded the issue of shortage of work support in rural and remote areas. Families find it harder to find willing workers to assist in running the farm and managing their children’s distance education. Many visitors to Australia appreciate ‘real life experiences’ on farm and are willing to volunteer their time in return for meals and accommodation e.g. ‘WWOOF’ program (Willing Workers on Organic Farms). If volunteer hours were once again reinstated as eligible for a Second-Year Visa, rural Australia’s employment pool would expand relieving pressure on its families.

RECOMMENDATION SEVEN

Make the second-year visa accessible to nannies, governesses and distance education tutors under agriculture.

The reinstatement of volunteer hours as an eligible activity for a Second-Year Visa.

Review of DAMA eligibility and sponsorship with the view that successful recipients will fill soaring ECEC vacancies in rural, remote, and regional Australia.

Temporary Work (Skilled) Visa (subclass 457)

This visa was replaced with the new Temporary Skill Shortage (TSS) (subclass 482) Visa in March 2018 which supports businesses in addressing genuine skill shortages, particularly in rural, remote, and regional areas.

Visa applicants are now required to be sponsored by a business for up to four years as per their specified skill. Skilled ECT's, Primary and Middle School teachers, Private Tutors, Regional Education Managers and Childcare Centre managers are all on the approved occupation list.

There is a real shortage of people willing to fulfil Distance Education supervisor/tutoring roles. If qualified teachers were happy to work with Distance Education students in remote classrooms, it would be an excellent option, however more often it is a skilled worker such as a nanny or governess who is willing to accept Distant Education opportunities. It would be extremely beneficial if nannies and governesses could be added to the TSS Occupations List and private tutors and teachers could then be approved for distance education classrooms.

RECOMMENDATION EIGHT

That teachers, distance education tutors, governesses and nannies be added to the current 'Specified Work' list for Working Holiday Visas so they can assist with childcare and education for rural and remote families.

Pay Parity

For many years the Education Departments have been aware of the need to provide pay and incentives to attract and keep teaching staff in rural, remote, and regional locations. We now need the same attention paid to attracting and retaining staff in the ECEC sector. In very remote areas, access to housing or subsidised housing can mean the difference between having an operational centre or not. Rural, remote, and regional areas need assistance to attract ECEC educators because our children deserve a 'good start' too. We are losing university trained ECT's to the school system where the pay and conditions far outweigh that of long day care

centres, yet we know how important those early years are. These educators are with our children during their years of greatest development, yet we are not prepared to pay or reward them accordingly. Pay parity of Early Childhood Educators is a significant issue.

An Early Childhood Teacher completes a four-year degree course. If they elect to work in the public school system in a rural, remote, and regional location, the additional benefits they would get compared to working as an Early Childhood Educator would include:

- Additional 7 weeks of annual leave (approx. \$10,000pa)
- Significantly shorter contact hours per week
- Approx. \$20,000-\$30,000 additional salary
- Professional mentoring by other teachers
- Structured Professional Development programs (\$10,000 pa)
- Access to teacher housing (at a 70% discount on market rates in Bourke) (\$10,000 pa).

Early Childhood services are significantly limited in their budgets.

RECOMMENDATION NINE

Incentives and structures which allow Early Childhood educators to work in rural, remote and regional areas without disadvantage in comparison to their urban colleagues.

That pay package parity of Early Childhood Teachers in rural, remote, and regional locations across all Early Childhood Education settings be addressed.

Impact of ECEC staff shortages on families, children, and sector providers

Regional ECEC provider's state:

'Sometimes we have ten staff away, or six staff away before we even open the doors, this means that casual staff must be called in to cover the staff away or at worse closing the room.'

‘Providers have strict children to educator ratio’s and if they are not complied with, we can be fined and or put under investigation. When staff do not turn up, priority of access must be given.’

‘Last year, a few times the rooms had to be completely closed in one centre as there simply was no staff to care for the children enrolled in care that day. We are just one of four in our region, and to close the room due to staff shortages is quite normal.’

Further:

‘Staff are at times are psychologically and emotionally burnt out from being early childhood educators. Staff are dealing with children who have major behavioural issues, such as throwing chairs, educators get hurt, a few years back an educator had her eye socket damaged, and her arm broken. It is also the psychological impact and injury. ‘

‘It is a lot.’

‘The children are anxious from the child, they feel unsafe, staff feel unsafe and other children even wet themselves when the child with behaviour issues becomes triggered. Families do not want to bring their children in anymore.’

‘A lot of the time, staff want further training in de-escalation techniques and how to respond to trauma in children. They simply do not have the time to watch a teaching video on the learning portal or online. Staff need more support, more face-to-face teaching, and paid blocked out time to complete the training.’

‘Some of these kids are not even two years of age, there are red flags, but not enough for NDIS support. If the child is not diagnosed, then we do not receive any help with extra staffing or support.’

RECOMMENDATION TEN

- **Extra support for rural, remote, and regional educators to be retained and to continue to work in early childhood, including paid face to face learning.**
- **A clear future ten (10) year plan to firstly fill current vacancies, and secondly looking at sustainable workforce capability of rural, remote, and regional ECEC, including educators, ECT's, and other staff, for example chefs and early childhood assistance staff. (or be incorporated into the National Teacher Workforce Plan)**
- **ECEC should consider having on site ECEC social workers, to liase with parents, assist children and to wrap around case management support for families and children who are experiencing difficulties and vulnerabilities.**
- **That retired teachers be contacted to be offered ECEC work to assist in filling the ECT shortage in rural, remote, and regional Australia. That retired teachers be given bridging courses to transfer teaching degrees into ECT degrees.**

Creative Solutions for Essential Services

Considering creative solutions for rural, remote and regional childcare has the potential to provide reciprocal benefits for working mothers, children and agriculture / associated businesses. **According to Care Corporate when 'on site' support for childcare is supported by the workplace the following occurs:**

- **Improved ability to attract high quality employees when recruiting;**
- **Reduced absenteeism and tardiness;**
- **Higher levels of morale and company loyalty;**
- **Lower staff turnover and a higher retention rates;**
- **Better return to work rates after parental leave;**
- **Increased productivity; and**

- **An enhancement in the company’s reputation and perception in the wider community.**³⁴

Roxanne Elliott Care Corporate Founder stated:

“Anything your company can do to relieve an employee’s stress and anxiety surrounding childcare will pay off in dividends. Even if your organisation can’t afford to build a childcare centre please don’t give up, there are a range of other options available.”³⁵

Consideration of in house ECEC, should be given to rural, remote, and regional hospitals, schools, educational institutions and health centres, alongside emergency services. (Ambulance, Police, Fire, Emergency Department Workers / Staff, Energy workforce, Volunteer fire fighters & State Emergency Services (SES)) Twenty-Four (24) hour childcare solutions would be meeting the family’s needs whilst assisting with filling critical skills shortages in rural Australia. Specific to rural, remote, and regional Australia, Agriculture requires at times, 24-hour work for seeding, ploughing and or stock/ dairy milking / requirements, and as this feeds Australia, flexibility and meeting these family’s needs should also be considered.

Rural, remote, and regional mother’s state:

‘If it was not for my boss having the childcare on site, there is no way I could have returned to the Airforce; I would not be where I am now if I did not return to work. The difference that childcare has made to my professional life, earning capacity and career has benefited my own family, and the communities I work in.’

2. Upskilling and Educating Staff

Regional schools who provide VET pathways, state that this system is working well to facilitate formal qualifications and pathways into Early Childhood Education, where this

³⁴ Care Corporate. The Business Case for On Site Childcare.
<https://www.carecorporate.com.au/portfolio-item/the-business-case-for-on-site-child-care/>
³⁵ Ibid.

is working well in rural, remote, and regional Australia, NRWC and ICPA (Aust) would strongly encourage this to be supported and strengthened.

Across rural, remote, and regional Queensland, the following is a mandatory eligibility funding requirement:

- *Employ a qualified Early Childhood Teacher (ECT) to deliver the Approved Kindergarten Program. Further information relating to exceptional circumstances for ‘working towards’ ECTs is outlined in Section 7.1. Qualifications must meet requirements of an ECT under the National Quality Framework (NQF) and be checked against Approved ECT Qualifications on the Australian Children’s Education and Care Quality Authority (ACECQA) website.³⁶*

ECEC regional sector providers told NRWC and ICPA (Aust), ‘that they are required to have an ECT on site to receive funding.’ **However, they sometimes have no teacher or staff member with these qualifications on site, so they simply cannot give children access to care. Simply put, rural, remote, and regional ECEC providers, cannot comply with mandatory funding eligibility requirements of ECT’s on site.**

Further, ECEC regional sector providers state that barriers to upskilling and staff completing further studies are:

- Not enough support for practical training;
- Not enticing for young people, they get paid more at McDonalds than childcare work or traineeships, some are above the award, on \$16.00 per hour;
- Not worth the income difference (for those in director or management roles);
- Finding the money, time and applying for scholarships is too difficult; and
- The roles are inherently challenging leading to staff leaving.

³⁶ Queensland Government. *Queensland Kindergarten Funding Essentials*. Last updated 24 January 2024. <https://earlychildhood.qld.gov.au/fundingAndSupport/Documents/kindy-funding-essentials-long-day-care.pdf>

Safe, Secure and Affordable Housing

The Employment White Paper released in September 2023, highlights that secure and affordable housing is critical to finding and maintaining employment. In rural, remote, and regional Australia, access to safe and affordable housing is non-existent.³⁷ Not only for ECEC staff, but for General Practitioners, for hospital staff, for teachers and essential service providers in the community.

Housing is a requirement for workers to relocate or stay in rural, remote, and regional Australia, employees need safe, affordable, and secure housing and without this they simply cannot stay in rural, remote, and regional Australia. Public and private sector must improve relocation packages and consider housing as part of the employment contract, as without this ECEC staff simply will not come or will come but will not be able to stay.

RECOMMENDATION ELEVEN

- **Individualised Training Packages Should be available to rural, remote, and regional women, young women and parents who want to be employed in ECEC.**
- **Rural, remote, and regional women, young women, parents, and families should be given information and clear ECEC career paths to achieving tertiary education, without financial penalties.**
- **Rural, remote, and regional ECEC staff should be able to complete overtime without financial penalties as this discourages overtime, which the ECEC sector is desperately needed to fill the souring vacancies.**
 - **Aboriginal Torres Strait Island, rural, remote, and regional women be encouraged and supported, to further complete ECEC studies.**
 - **Supports and incentives without financial penalties should be offered and encouraged to those currently employed in the sector.**
- **Relocation and Housing should be incorporated into recruitment of ECEC staff.**
- **Include specific targets for Early Childhood Teachers in the National Teacher Workforce Plan (Priority Area 1: Improving Teacher Supply)**
- **Further promote Early Childhood Teachers in promotions such as ‘*Be That Teacher.*’**

Greater Recognition of the Care Economy

There should be an increased national recognition of the care economy. There should be increased recognition for the incredible work that ECEC staff do for children’s wellbeing and women’s participation in work, in rural, remote, and regional Australia, for example, more National awards, certificates and more State / Territory awards. Women and parents who choose to stay at home with their children should also be acknowledged, supported, and celebrated for the huge contribution they give to society, as demonstrated by the cost of ECEC, which is the childcare part of the economy being outsourced. Parents should always have an informed choice for decisions relating to ECEC or to stay at home, neither with bias.

RECOMMENDATION TWELVE

Increased Recognition and awards acknowledging the contribution that rural, remote, and regional ECEC staff make to children’s wellbeing and parents’ ability to participate in the workforce.

Increased acknowledgement and celebrations of rural, remote, and regional women and parents who choose to stay at home with their children.

Rural, remote, and regional women and parents always have choice available to them and are informed of all the choices available.

3. Providing Quality Care

Rural, remote, and regional Australia has distinctly unique challenges in achieving accessibility and availability of ECEC for children and working women. One working mother in Alice Springs stated:

“There is no day care, I am on every list, some have twelve months waiting lists. Then there is no housing also, they need workers, but we just don’t get the support we need to stay. I am in health care, but there just isn’t day care available. You get desperate and accept anything that is available. Quality is important but if there is no choice, there is no choice.”

ECEC staff in regional QLD state :

‘There is no real ‘minimum standards’ for example with safe sleep, there is no learning module in the National Quality Framework. It is up to the directors or supervisors, how we interpret the safe sleep standards. For example, it is different for 1–2-year-olds, compared to 2–3-year-olds, how often you would check them? For example, in some centres they check every 5 minutes for smaller children, then in others they check every 20 minutes. There are inconsistencies.’

Sector providers suggest there urgently needs to be National Minimum ECEC Standards. Further, ECEC staff suggest that the standards need to roll out Nationally, with easy fact sheets that can be laminated and put up in ECEC services.

RECOMMENDATION THIRTEEN

ECEC quality of care should not be compromised.

National Minimum Standards should be set and rolled out Nationally to all ECEC services.

4. Child Protection

National Working with Children's Check (WWCC)

The process of obtaining the Working with Children Check (WWCC) in each State or Territory is expensive, slow and impedes early childhood workers, tutors and teachers who wish to help various families interstate. A national WWCC certification would help resolve this and was recommended in the Royal Commission into Child Abuse Final Report.³⁸

Rural ECEC staff have informed NRWC and ICPA (Aust) that a person can be disqualified in WA, however, be approved in QLD. There are significant concerns that the State and Territory WWCC are not picking up disqualified applicants working with children in ECEC, placing children at real risk or actual harm or sexual harm. Further, there have been cross jurisdiction child sex offenders who have held positive WWCC and continued to offend in cross jurisdictional childcare services.³⁹

Further, those who are under investigation should be immediately stood down and cease to return to work until the investigation finds there is no risk to the children in ECEC settings.

Further there should always be immediate communication of disqualified WWCC over the phone, not by a letter, ECEC staff state:

‘Letters are sent communicating the disqualification in another State, however a phone call for immediate action is needed.’

A National Working with Children Check system should be immediately established to prevent heinous crimes against children and afford paramountcy of children's safety in ECEC settings. This would also align with Article 19 of the CROC (located on page 5 & 6 of this submission)

³⁸ Royal Commission into Institutional Responses to Child Sexual Abuse. (2015) Working with Children Checks. <https://www.childabuseroyalcommission.gov.au/working-children-checks>
<https://www.childabuseroyalcommission.gov.au/working-children-checks>

³⁹ ABC, Child Abuse Investigation, <https://www.abc.net.au/news/2023-08-01/qld-afp-child-abuse-police-investigation-child-care-worker/102672216>, 3 August 2023.

RECOMMENDATION FOURTEEN

That a National Working with Children Check (WWCC) system be immediately established to avoid heinous sexual assault crimes against children and afford paramountcy of children's safety in all ECEC settings.

That a National Working with Children Check (WWCC) certification be established as a matter of priority to ensure early childhood carers, teachers, educators, and those assisting with education particularly in rural and remote areas can transition across states/territories more smoothly.

ECEC staff under investigation should be stood down from work until they are cleared of all possible risk of harm to children.

All disqualification or notifications of child protection matters should be urgently communicated to the ECEC service, so that the paramountcy of children's safety occurs.

ECEC staff allege they are not protected when making Mandatory Child Harm Reports

Rural ECEC staff state that they are not protected by Child Safety legislation. For example, staff state when they make a mandatory report, the parents attack them saying, 'they said it was the kindy.' The parents then immediately remove the child from care which was a protective factor for the child. Staff feel they have let the child down, further they feel that when they reported to the department, the department 'did not have our back.' This cascades into a cycle, where the parents have no trust, and they have priority allocation for the centre. Further, the staff then are reluctant to support and or report, they are concerned if they are identified they will lose the protective factors that the child has coming to care.

One rural ECEC staff stated:

“I would rather the child be here and be safe.”

RECOMMENDATION FIFTEEN

Strengthened Legislative Protections to protect ECEC staff who mandatory report under State and Territory Child Safety or equivalent Legislation.

Improved understanding for Child Safety Staff on the implications of disclosing who has made the notification to parents or carers, particularly on the protective factors for the child at the centre of the notification.

Australian Child Maltreatment Study

The Australian Child Maltreatment Study demonstrates the detrimental impact of child maltreatment across the lifespan.⁴⁰ ECEC services and staff should be adequately trained in referral pathways for families and children who are at risk or are experiencing domestic family sexual violence (DFS). 48 % of children who have experienced child maltreatment develop mental health disorders later in life. The child maltreatment study also found that the highest prevalence of child maltreatment was exposure to domestic family sexual violence at 43.8%. Early intervention and prevention are also part of the National Plan to End Violence Against Women and Children and the first stand-alone National Aboriginal Torres Strait Islander Action Plan.⁴¹

RECOMMENDATION SIXTEEN

All ECEC Staff be trained in level I DFSV assessment tools (for that State and Territory) and understand referral pathways for families experiencing DFSV.

The Australian Government provide progress on Intimate Partner Violence under the Children’s Wellbeing: Centring child rights in the 2030 agenda (SDG) (page eight (8) of this submission).

5. Meeting Family’s Needs

Currently ECEC services are not meeting the demands of rural, remote, and regional women, children, parents, and families. Specific location-based support and increments to support rural, remote, and regional women, children, parents, and families would assist in ECEC meeting families needs.

⁴⁰ Haslam D, Mathews B, Pacella R, Scott JG, Finkelhor D, Higgins DJ, Meinck F, Erskine HE, Thomas HJ, Lawrence D, Malacova E. (2023). *The prevalence and impact of child maltreatment in Australia: Findings from the Australian Child Maltreatment Study: Brief Report. Australian Child Maltreatment Study.* Queensland University of Technology.

⁴¹ Australian Government. Department of Social Services. The National Plan to End Violence Against Women and Children 2022 – 2032. <https://www.dss.gov.au/ending-violence>

Further, the NRWC and ICPA (Aust) would advocate that any future reforms, should be co-designed.

RECOMMENDATION SEVENTEEN

To meet the needs of rural, remote, and regional women, children, and families, future ECEC reforms should be co-designed with rural, remote, and regional women, young women, parents, and families.

Rural ECEC staff inform the NRWC and ICPA (Aust) that they are so busy with competing demands of children, care, and families, that they sometimes miss the subtle signs that parents are experiencing difficulties, or the service is not responsive to their needs.

For example, one regional staff member reported:

‘a family ticked the financial hardship box on intake, however I missed this, as I was trying to establish a relationship with the family and children. The family ended up saying they ‘were not okay.’ They left the centre feeling they did not get the service they wanted, they also did not get the help they needed.’

Further ECEC rural staff state:

‘ECEC staff report having ½ hour lunch breaks to keep room ratio’s and that their tax bills are not worth the overtime.

Rural ECEC staff state ‘much of the slowing down to really support families, is just impossible with such under resourcing, excessive administration tasks, twelve (12) hour days, no days off week after week, short or no lunch breaks and limited certified supervisors.

Meaning if you are the certified supervisor, you then are under more pressure with administration tasks, so its easy to miss things and impossible to meet all family’s needs.’

Transport

One barrier in rural and regional Australia is transport. The most vulnerable children who need to be in care, have no access to transport to access ECEC. Bus services are not always available, even in large regional centres. Safe affordable access to transport for rural, remote, and regional children needs to be considered to remove barriers to access ECEC.

For example, due to the housing crisis women and children escaping DFSV are in rural, regional, and remote hotels. Hotels may be in walking distance to the pre-school; however, the heat is excessive in some places, mothers don't always have prams for their younger children, so it becomes too hard for the children to get to preschool. The children want to go. Only certain schools have a bus run.

It would be beneficial, to mirror other successful school services, such as in remote Aboriginal communities, where the bus comes to the children, beeps, waits, then beeps again, until the child gets on the bus. If they don't turn up, an Aboriginal Torres Strait Island Social Emotional Wellbeing Worker (SEWB) or social worker goes to help the family get the children to school in the morning and find out what is occurring for this child and family. These vulnerable children at times need breakfast, lunches, and other assistance to maintain coming to school. The other younger children would benefit from being linked in with ECEC, however transport again becomes the barrier.⁴²

In these instances, the thirteen (13) weeks subsidised care, (and extensions) are crucial to allowing mothers and children to recover from fleeing from violence. This initiative should continue as it assists the most vulnerable rural, remote, and regional families experiencing DFSV.⁴³

⁴²SNAICC. National Voice for our Children. (2024) Early Childhood Development. <https://www.snaicc.org.au/our-work/early-childhood-development/>

⁴³ Australian Government. Department of Education. Early Development Census, <https://www.education.gov.au/early-childhood/early-childhood-data-and-reports/australian-early-development-census-aedc> & Australian Government. Services Australia. Temporary Financial Hardship Childcare Subsidy. <https://www.servicesaustralia.gov.au/temporary-financial-hardship-additional-child-care-subsidy-amount?context=41866>

RECOMMENDATION EIGHTEEN

Access to transport for rural, remote, and regional children needs to be considered to remove barriers to access ECEC.

Successful programs which have been successful to engage rural, remote, and regional vulnerable families should be mirrored around Australia.

Continued thirteen 13-week subsidised ECEC care (and extensions) for vulnerable women and children.

6. Inconsistencies with funding and compliance regimes

The overarching themes that the NRWC and ICPA (Aust) heard from ECEC sector was that there is a lack of support and too many inconsistencies.

For example, sector providers state:

‘There is a lack of local on the ground support, including lack of local regulators, with one regional centre saying they had not had an assessment for 7-8 years.’

To provide quality ECEC to rural, remote, and regional children in formative years, quality assurance is redundant if the assessments are seven (7) years apart. The children that could benefit from the quality regulation, would have left the centre when they are over five (5) years old.

Further, ECEC staff deny any face-to-face support, for example, staff state ‘we are busy with children and administration tasks, we do not have an extra two hours to study an online module. For some of my 42 staff, they do not learn well online, so the modules are available, but rarely can my staff access or utilise them.’ Rural ECEC sector states, ‘education for staff needs to be individualised to accommodate learning styles and assist in retaining staff.’

For inconsistencies, regional ECEC staff stated:

‘There are no minimum standards, quality is really ‘an interpretation of quality.’ For example, services receive exceeding expectations (under the National Quality Framework (NQF)); however, they state, “I don’t know how we got it.”

‘Our funding is set from the previous year ‘Australian Early Development Census’ (AECD) data and enrolments⁴⁴; however, centres do not know if last year’s data, will provide for the different levels of funding we require for the current year and enrolments.’

RECOMMENDATION NINETEEN

More consistent funding arrangements for ECEC congruent to the family’s needs in rural, remote, and regional Australia.

The ECEC review include a review of the current National Quality Framework, assessment processes and outcomes for sector, parents/ families, children, in relation to quality of care.

Affordability

Support for three to four-year-old inclusion in Assistance for Isolated Children (AIC) Distance Education Allowance

Three to four-year-old students enrolled in an approved pre-compulsory distance education program need to be supported while participating in their essential transition to formal schooling programs. The Assistance for Isolated Children (AIC) Distance Education Allowance should be extended to include these children as no other financial assistance is available for this cohort.

The Australian Government recognises the importance of ensuring that children are not disadvantaged in terms of their early physical, social, and educational development. Researchers throughout the world report that the social and developmental gap in children’s functioning and achievement can be significant by age six.

⁴⁴ Australian Government. Department of Education. Early Development Census, <https://www.education.gov.au/early-childhood/early-childhood-data-and-reports/australian-early-development-census-aedc>

These differences in the cognitive, non-cognitive and social skills are strong predictors of later academic, occupational and life achievement.

The delivery and accessibility of early learning programs for children in the year prior to starting formal schooling has never been better. This can be attributed to the Federal Government's commitment to the Universal Access to Early Childhood Education Program. Despite this, ICPA (Aust) remains concerned about the affordability of accessing programs for those living in rural and remote regions.

ICPA (Aust) believes the impact of not being able to access affordable early learning for children living beyond the metropolitan boundaries is evident in the gap between educational outcomes for rural and remote students when compared to those living in large centres. Much of this is due to learning difficulties which are undiagnosed in the early years and having very limited opportunities to socialise and interact with other children.

All States and Territories offer early learning programs delivered by distance education and this is the only avenue available for many families living in rural and remote areas. Families wanting to access these programs are bearing the entire cost associated with administering, resourcing, and teaching the lessons.

Across Australia, around 200 children access recognised 3-4-year-old programs in their homes through distance education, which today includes a mixture of hands-on play-based learning and teacher-led structured lessons which involve the use of technology for communication. As with every other early childhood program for three to four-year-olds, these distance education lessons are designed to help children transition from home to school. The children need a designated learning space in which to learn school behaviours, such as the ability to sit at a desk for enough time to complete a task, to use the technology required for distance education, to appropriately interact with their peers and teacher and to understand the formal concept of school. It is vital that young children have opportunities to socialise face-to-face with other children of their age.

This often requires families to travel great distances to attend school functions which provide an opportunity for the children to participate in group activities, such as sport, practise conversation skills and socialise with their peers. These functions are also valuable in providing teachers and other professionals with both group and individual evaluation and diagnostic opportunities.

Families undertaking approved distance education programs are effectively blocked from any funding to assist with meeting the costs of program delivery, setting up their schoolroom and accessing school functions.

These students are deemed ineligible for the Assistance for Isolated Children, (AIC), Distance Education Allowance as 3-4-year-olds taking part in these early learning programs are not recognised by the Australian Government and no payment is available through the Childcare Subsidy (CCS) as these children are still in their parents' care.

RECOMMENDATION TWENTY

The extension of Assistance for Isolated Children (AIC) Distance Education Allowance to include three and four-year-olds enrolled in an approved pre-compulsory early childhood education program would improve access and affordability.

Reducing Childcare Costs for Families

In 2022 over 40% of parents accessing preschool paid over twenty dollars (\$20.00) per hour for care.⁴⁵ If this parent was an Assistance in Nursing (AIN) in Queensland being paid \$41.20 per hour,⁴⁶ on a casual rate, the hourly rate after paying for childcare would be twenty-two dollars and twenty cents (\$22.22) per hour. For an eight-hour shift, this would be estimate of one hundred and seventy-six dollars. (\$176.00) Another example is Police Recruits, if they were a parent, the base salary is \$1,811.53 per fortnight,⁴⁷ take away twenty dollars \$20.00 per hour for care x eight hours x five days per week totals \$800.00, leaving \$1,011.53 per fortnight.

⁴⁵ Australian Bureau of Statistics (ABS). (30 March 2023) *Preschool Education Statistics about preschool education, including enrolment, attendance, fees, and service providers*. Reporting period 2022. <https://www.abs.gov.au/statistics/people/education/preschool-education/latest-release>

⁴⁶ Queensland Health. (1 April 2023) Wage Rates – Nursing Stream. <https://www.health.qld.gov.au/hrpolicies/wage-rates/nursing>

⁴⁷ Queensland Police Service. (2021) What we offer. <https://www.policerecruit.qld.gov.au/what-we-offer>

RECOMMENDATION TWENTY-ONE

Immediately increase the CCS to assist with the cost-of-living crisis, by providing universal access to free 30 hours of ECEC

Clarify terminology of ‘Free Care’



The above picture from Queensland Kindergarten Funding Essentials states ‘free kindy.’⁴⁸ This can be confusing for parents accessing the service if they have out of pocket expenses. Some ECEC providers state that parents also come in expecting ‘free’ day care five days a week, which then they must explain that the centre-based day care is not ‘free.’

RECOMMENDATION TWENTY-TWO

Clearly advertise and inform families that all care is not free to avoid confusion and extra pressures on the ECEC sector.

⁴⁸ Queensland Government. Early Childhood Care and Education. (2024)
(<https://earlychildhood.qld.gov.au/freekindy#/search>)

Inclusivity

Intensive Support Program

Funding for Intensive Support Programs, when rolled out is the equivalent of five hours a day for the child, only for children who are diagnosed, the issue is that five hours a day is not enough. For example, if a child attends from 9-2pm, however then they stay until 5.30pm, then there is not enough staff and the extra paid staff member for the child has left the service. Quite often educators are taken away from transition times, for morning tea preparation or for sleep times, which are important routines to keep. Rural, remote, and regional sector providers state that an increase in hours for the Intensive Support Program would help.

Referring to page 27 of this combined NRWC and ICPA (Aust) submission (this submission), without diagnosis children are not receiving the care they require for early intervention and prevention. Rural, remote, and regional staff tell NRWC and ICPA (Aust) clear local referral pathways are desperately needed. For example, for children under seven, Uniting Care can assist with care coordination, NDIS support formal assessments and complete NDIS applications in the formative years.

Children who have not been diagnosed are still displaying behavioural issues, that require the ECEC to provide extra care and support. The impact on the care of undiagnosed children must be considered in this reform. We refer to sector comments on page 27.

RECOMMENDATION TWENTY-THREE

Increased hours for ISP support for rural, remote, and regional children in ECEC.

Increased care and support for rural, remote, and regional children who are not diagnosed, however requiring ISP support and extra educators to provide care.

Clear referral pathways for ECEC services to refer children locally who are displaying developmental delays, concerning behaviours and/ or room disruptions.

Social workers on site in the ECEC services to provide support for families and staff and make local referrals.

Aboriginal Torres Strait Islander Children

NRWC advocate that the recent report on closing the gap, highlights the need for improvement for ATSI children's access to ECEC services. NRWC endorse the lead agency SNAICC on their recommendations and specific interventions, such as Thrive before Five.⁴⁹

ECEC service providers tell NRWC that ATSI funding is onerous to obtain, and hard to meet eligibility requirements, despite the obvious that rural, remote, and regional Australia is where most ATSI families live. For example, ECEC services state they must outsource community members for smoking ceremonies and celebration of culture. ECEC services want to support their ATSI families, and build connections, however this takes time and funding eligibility creates a barrier to families feeling culturally safe and connected. Rural, remote, and regional ECEC service providers would like to see more support available and a basic minimum standard for staff to assist families to feel culturally safe.

For example, with the flags, one educator put the Aboriginal flag first as she felt that was the correct way, then the Torres Strait Family took offence as the Torres Strait flag she felt was supposed to be closest to the water, and always in the direction of water to represent the connection to sea country. The family left the centre over this. Staff then feel unsure and don't want to do the wrong thing.

RECOMMENDATION TWENTY-FOUR

More support for ATSI families to feel culturally safe and connected to ECEC services.

More support for staff to feel supported to understand ATSI culture, co designed with local ATSI community, with more employed cultural lead positions for ATSI peoples in ECEC.

De escalation and trauma informed responses for children to be rolled out Nationally to all ECEC services.

Lead ATSI organisations for children, such as SNAICC should be leading minimum standards for ATSI children and families. These minimum standards should be rolled out Nationally.

⁴⁹ Australian National Indigenous Agency. (13 February 2024) *Commonwealth Closing the Gap 2023 and Annual Report and 2024 Implementation Plan*; and SNAICC. National Voice for our Children. (2024) Early Childhood Development. <https://www.snaicc.org.au/our-work/early-childhood-development/>

Flexibility

Flexibility for the rural, remote, and regional women is non-existent. Due to the critical staff shortages of educators and ECT, there is no flexibility, the thin market does not allow for choice. If the current reform, could allow for more choice for rural, remote, and regional women to have care which meets their specific needs, consistent with their geographical location, this would greatly assist the purpose of ECEC, to enhance children's lifelong learning outcomes and allow women, parents, and families to participate fully in the economy.

Flexibility for the funding arrangements, such as with ATSI families, ISP and funding based on last year's enrolments, should be a priority to encompass rural, remote, and regional women and children, who are detrimentally impacted by funding that fails to recognise their unique needs.

Flexibility for Staff who work in ECEC, needs to occur, for example, if 93 % of the workforce is ECEC is women, then encouraging and supporting women who work in ECEC, would assist in retention of ECEC staff. For example, considering wellness packages, flexible working hours to pick children up from school, ability to return part time including for one day a week, able to do overtime without financial or tax penalties. The flexibility would have to be within reason, as strict ratios of educators to staff must be adhered to.

Flexibility for children who are accessing the service needs to be a priority, if they require only six hours, but need to book a ten-hour session, could better arrangements be in place for flexible hours? This includes meeting the rural, remote, and regional family's needs, which will be entirely different to urban settings.

Other Relevant Matters

New Independent Early Childhood Education and Care Commissioner

Whilst the NRWC and ICPA (Aust) welcome any federal co-ordination of ECEC, to strengthen working with children checks, quality of care and workforce capability, concerns have been raised by rural communities and ECEC providers about a federal ECEC Commissioner.

Rural women and ECEC providers state unequivocally there are not enough resources locally. Proposing instead of federal co-ordination points, that ECEC reform focus on creating and strengthening local support co-ordinators especially in rural, remote, and regional Australia.

This would create more rural, remote, and regional employment opportunities, increase ‘on the ground’ co-ordination of National Quality Framework and ECEC policy and allow for this co-ordination to be responsive to the local community.

RECOMMENDATION TWENTY-FIVE

Rural women, parents and families and ECEC providers unequivocally state there are not enough resources locally.

Suggesting instead of federal co-ordination Commissioners, more emphasis should be on creating local support co-ordinators especially in rural, remote, and regional Australia.

Climate Change, Pandemics, Preparation for | Poly Crisis impact on children

In 2022, children from around the world were exposed to many different challenges, including a severe pandemic, food insecurity, global wars, and increasing climate change impacts with the alarming increase and severity of floods, fire, and drought. This is likely to continue for children worldwide and in Australia, preparing for the impacts of the ‘poly crisis’ on children should be considered in any National Policy pertaining to the formative years and care of children who will continue to be impacted. In their 2023 Global Risks Report, the World Economic Forum (WEF) explains the term through the following: “present and future risks can

also interact with each other to form a ‘polycrisis’ – a cluster of related global risks with compounding effects, such that the overall impact exceeds the sum of each part”⁵⁰.

Further, in their report, WEF identified environmental-related risks as having the most severe impact over the next decade. Specifically, ‘Failure to mitigate climate change’ and ‘Failure of climate change adaptation’ are listed as the top two ranking of severe risks on a global scale, followed by ‘Natural disasters and extreme weather events’. The compounding nature of global risks is already beginning to have a profound and cascading effect on our society. A perfect example is the effect Russia’s war on Ukraine had on Australia’s energy and food supply. The supply shortage was further exacerbated by climate change with floods and droughts, and all issues together contributed to a growing increase in inflation which in part was already increasing due to government spending management of the COVID-19 crisis⁵¹.

The intersectional nature of these risks will affect our future generations in a much more severe nature than what we see at present. With Australia’s increase in cyclones, floods, bushfires, and increasingly charting the hottest weather on record, climate-related issues should now more than ever be at the forefront of all discussions as putting climate change on the back burner will only lead to an exacerbation of the polycrisis we are beginning to see. An oversight by the Australian Government on the addressing of climate change could be the difference between a thriving nation and total economic collapse and should most definitely be considered in the ECEC review.

RECOMMENDATION TWENTY-SIX

The Productivity Commission (PC) considers ‘poly crisis’ and ‘extreme climate related event’ impacts on rural, remote, and regional communities in this ECEC review.

⁵⁰ World Economic Forum. *The Global Risks Report 2023: 18th Edition*. 2023. p. 57.

⁵¹ Ben Hassen, T., & El Bilali, H. (2022). Impacts of the Russia-Ukraine War on Global Food Security: Towards More Sustainable and Resilient Food Systems?. *Foods (Basel, Switzerland)*, 11(15), 2301. <https://doi-org.ez.library.latrobe.edu.au/10.3390/foods11152301>

Nutrition in Early Development and Rural, Remote and Regional ECEC services

On 12 February 2024, an ABC news article released that a study by Professor Thorpe of 1,600 CBDC in Queensland, Professor Thorpe found that childcare centres in the most remote communities were ‘less likely to provide food.’ Put simply, parents who cannot afford to pack a lunch box are required to pack a lunch box as the centre does not provide food, and children in rural, remote, and regional areas in Australia are experiencing food insecurity.⁵² This is one of the 48 *SDG Children’s wellbeing: Centring child’s rights in the 2030 (SDG)* related indicators that Australia has not reported on.⁵³

The importance of nutrition in the formative years of early development is well documented, on impacting behaviour and growth. Further as the brain and body is developing the most rapidly in this stage of life, nutritional imbalances can have impacts across the lifespan. Poor nutrition in childhood has been linked with obesity and obesity going into adulthood increases the risk of other chronic conditions, such as type 2 diabetes and cardiovascular diseases (e.g. coronary heart disease)⁵⁴. Chronic lifestyle conditions stemming from poor nutrition and diet contribute significantly to the burden of illness in Australia.

As of 2018, the Australian Bureau of Statistics (ABS) identified the combination of all dietary risks contributed to 50% of coronary heart disease burden, 26% of bowel cancer burden, 26% of type 2 diabetes burden, and 26% of stroke burden⁵⁵. These are alarming statistics but highlight the importance of adequate nutrition through the lifespan, but most importantly in the formative years to set our children up for the best chance of a healthy and productive future.

Although the onus of responsibility for a child’s health is often with the primary caregiver, as the Australian Institute of Health and Welfare (AIHW) has identified, there is also a responsibility for federal and state governments and the wider communities to share in the responsibility of supporting children’s health⁵⁶.

⁵² ABC. (Monday 12 February 2024) Young kids failing to get adequate nutrition in early childhood centers, research suggests. <https://www.abc.net.au/news/health/2024-02-12/child-health-nutrition-gaps-in-early-childhood-centres/103441340>

⁵³ UNICEF Division of Data, Analytics, Planning and Monitoring – Data and Analytics Section, Progress on Children’s Well-Being: Centring child rights in the 2030 agenda – For every child, a sustainable future, United Nations Children’s Fund (UNICEF), New York, September 2023.

⁵⁴ Australian Institute of Health and Welfare (2022) *Australia’s children*, AIHW, Australian Government.

⁵⁵ Australian Institute of Health and Welfare (2021) *Australian Burden of Disease Study 2018: Interactive data on risk factor burden*, AIHW, Australian Government, accessed 19 February 2024.

⁵⁶ AIHW, *Australia’s children*,

The NRWC and ICPA (Aust) would advocate for more research, both quantitative and qualitative studies in rural, remote, and regional Australia to ensure that children have access to basic requirements of life – food. Further, the food must be of high nutritional quality, so that the nutritional food source or lack of is not detrimental to children’s brain development, for example if fish oil is required for eye and brain development and behaviour and no longer in the natural diet, how can this be incorporated to improve behavioural, growth and general early childhood development within the ECEC sector to reduce adverse impacts across the child’s lifespan.⁵⁷

RECOMMENDATION TWENTY-SEVEN

- **The Productivity Commission (PC) considers access to nutritionally dense food for children in rural, remote, and regional Australia in this review.**
- **Further, this review in consultation with ECEC services in rural, remote, and regional Australia, work with sector to understand the barriers and how ECEC can be supported to provide basic requirements of life – ‘nutritionally dense food’ for the long-term health and wellbeing of the children.**
 - **The Australian Government urgently provide progress on:**
 - **population in poverty;**
 - **child poverty.**
 - **children in poor households; and**
 - **children in homes below PPP \$3.31.**
- **The Productivity Commission (PC) provide provision for further research into basic requirements of life ‘nutritionally dense food’ for children in rural, remote, and regional Australia. This should include research into the impact of food security across a child’s lifespan in Australia.**

⁵⁷ Ibid 46.

Conclusion

This inquiry is specifically looking at care of children in the formative years, this joint submission between the NRWC and IPCA (Aust) requests the Productivity Commission to consider Twenty-Seven recommendations.

The NRWC and ICPA (Aust) advocate that the Australian Government should strengthen the capturing of crucial data in relation to children's wellbeing, to afford a true base line. The Australian Government should have households complete the UNICEF Multiple Indicator Cluster Surveys (MICS) to obtain data on the wellbeing of children regarding the 48 child-related SDG indicators and assist with Australia reaching the 2030 SDG targets for children.

58

The NRWC and ICPA (Aust), agree with the International Labour Organisation and UNICEF report '*More than a million reasons: The urgent need to build universal social protection for children*' that ECEC policy, should include specific location-based support and increments to support rural, remote, and regional women and children who are integral to the agriculture, farming, associated businesses, business, community, and care economy of rural Australia.⁵⁹

Effective, efficient ECEC policy that is child sensitive and improves the lives of children, whilst improving rural women's, parents, families and communities' participation in the workforce will have a legacy for generations to come. These ECEC decisions made now, create Australia's future, which is our children.

Please contact NRWC CEO Keli McDonald or ICPA (Aust) President Louise Martin if you have any questions or require further information.

⁵⁸ UNICEF *Multiple Indicator Cluster Surveys (MICS)* (2024) [Home - UNICEF MICS](#) .

⁵⁸ Productivity Commission (November 2023) *A path to universal early childhood education and care*, Draft Report, Canberra, November. p 17.

⁵⁹ International Labour Organisation (ILO) & United Nations Children's Fund (UNICEF). (2023) *More than a billion reasons: The urgent need to build universal social protection for children*. Second ILO-UNICEF report on social protections for children. Geneva and New York.

Yours Faithfully,

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“The National Rural Women’s Coalition works to support and grow vibrant rural, remote and regional communities throughout Australia.”

