

A photograph of a woman with dark hair and glasses, wearing a dark blue shirt, leaning over and looking at a large green leafy plant. Two young children, a girl with blonde hair and a boy with brown hair, are also looking at the plant. They are outdoors in a garden setting. In the background, there is a straw hat and some foliage.

the  
Front  
Project

**2022-23**

**PRE-BUDGET SUBMISSION**

**An opportunity to make sure no Australian child, family or community misses out on the advantages of a high-quality, accessible, and affordable ECEC system**

## ABOUT THE FRONT PROJECT

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

We know high quality early education lays foundations for children that can last a lifetime, while providing huge benefits to our society and the future prosperity of Australia. We will see the full benefits when all children can access the quality education they need to overcome vulnerabilities and lead healthy, successful lives.

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### Acknowledgement of Country

The Front Project respectfully acknowledges the Traditional Owners of the land on which we work and learn, and pay respect to First Nations Peoples and their Elders, past, present and emerging.

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## Early childhood education is critical to tackling developmental vulnerability

The early years are a critical foundation for determining a child's trajectory in life, and for supporting families to work, study and participate in their community. In Australia, 1 in 5 non-Indigenous children, 2 in 5 Aboriginal and Torres Strait Islander children (AEDC, 2018) and 1 in 4 children from non-English speaking background (the Front Project, 2022) are considered developmentally vulnerable by the time they start school.

The effects of developmental vulnerability can persist for life, impacting children's ability to thrive at school and beyond (Heckman et al, 2010). By the time they reach Grade 3, children who started school developmentally vulnerable are a year behind their peers in NAPLAN, and this increases to two years behind by Grade 5 (the Front Project, 2022). Further, half of the total children starting school behind never catch up (the Front Project, 2022).

Disadvantage in Australia is concentrated in a small and disproportionate number of communities, commonly in regional and remote communities, and communities with a higher proportion of public housing (Tanton et al, 2021). Knowing where disadvantage is can help the Australian Government steer funding and resources to communities in most need.

With the impact of COVID-19 threatening to widen the inequality gap, investment in accessible, affordable quality Early Childhood Education and Care (ECEC) for communities experiencing disadvantage can ensure all children in Australia have the best start in life.

## Australia's ECEC system can break the cycle of disadvantage

This Budget is an opportunity to make sure no child, family or community misses out on the advantages of a high-quality, accessible and affordable ECEC system.

Over the last year, the Australian government has made significant and meaningful changes to ECEC, including raising the Child Care Subsidy (CCS) to 95 per cent, removing the annual cap and providing additional preschool funding through the Universal Access National Partnership (UANP). However, for these changes to have the most impact, the Australian Government should ensure children and families living in disadvantaged communities in Australia can access ECEC, many of whom cannot take advantage of these recent changes.

At the heart of Australia's ECEC system is educating and caring for the next generation of Australians. A well-functioning, accessible and quality ECEC system also supports Australia's economic prosperity, through the opportunity to provide employment to ECEC professionals, and giving parents and carers a chance to return to work or study.

These social, educational and economic outcomes are substantial, and most impactful, when they are invested in high-quality, affordable ECEC in areas experiencing disadvantage. With the great strides made in ECEC policy over the last 12 months, this Budget can ensure **Australia's ECEC system is robust, equitable and affordable** for all families, no matter where they live.

## KEY RECOMMENDATIONS (OVERVIEW)



### Recommendation 1:

Conduct a thorough review of the Inclusion Support Program and the Community Child Care Fund to ensure it adequately supports services operating in areas of disadvantage, especially in regional, rural and remote areas



### Recommendation 2:

Expand the Additional Child Care Subsidy and work with communities to encourage more families to access the help they need to access ECEC.



### Recommendation 3:

Revise the activities test to make sure no child misses out on ECEC, regardless of their parents' working circumstances.



### Recommendation 4:

Expand Commonwealth Paid Parental Leave (PPL) for all parents to 26 weeks, with a 'use it or lose it' component.



### Recommendation 5:

Commission the Australian Competition and Consumer Commission (ACCC) to investigate ECEC pricing and the market, to make recommendations for developing robust price control measures to ensure ECEC remains affordable for Australian families.



### Recommendation 6:

Adopt a system stewardship framework of leadership to ensure the sustainability and longevity of the ECEC sector.



### Recommendation 7:

Create a permanent emergency funding pool to ensure the sector is prepared for future external shocks like COVID-19, especially in regional, rural and remote communities.



## RECOMMENDATION 1

Conduct a thorough review of the Inclusion Support Program and the Community Child Care Fund to ensure it adequately supports services operating in areas of disadvantage, especially in regional, rural and remote areas.

### The opportunity

Supporting ECEC services and providers working in regional, rural and remote areas could increase ECEC's reach and impact.

Disadvantage is concentrated in a small and disproportionate number of communities in each State and Territory (Tanton et al, 2021). The further away you live from the city, the more likely you will start school behind, with nearly half of all children in very remote Australia facing barriers to their learning (the Front Project, 2022).

Families experiencing disadvantage face structural barriers to accessing ECEC, like limited transport options, time poverty, disability, lack of literacy skills, quality accommodation and unstable home situations (Skattebol, 2016).

Ensuring sufficient assistance is available through existing supports to services like the Inclusion Support Program (ISP) and Community Child Care Fund (CCCF) could equip service providers to support families to tackle these complex barriers to ECEC, especially in regional, rural and remote communities.

As such, we welcome the Government's recent announcement of increased funding for the ISP (DESE, 2021). However, five years after its initial implementation, we believe the current ISP needs to be improved to ensure that it meets the needs of children and the sector more broadly. Research highlights that service providers are not taking the opportunity to use the ISP funding, often due to the funding being tied to the child's ECEC attendance and the resulting uncertainty of securing successful ISP grant funding (The Smith Family, 2021). This has meant that there is an urgent need to review these two mechanisms to ensure they are providing streamlined solutions that improve outcomes for our most vulnerable communities as defined by the Australian Early Development Census (AEDC).

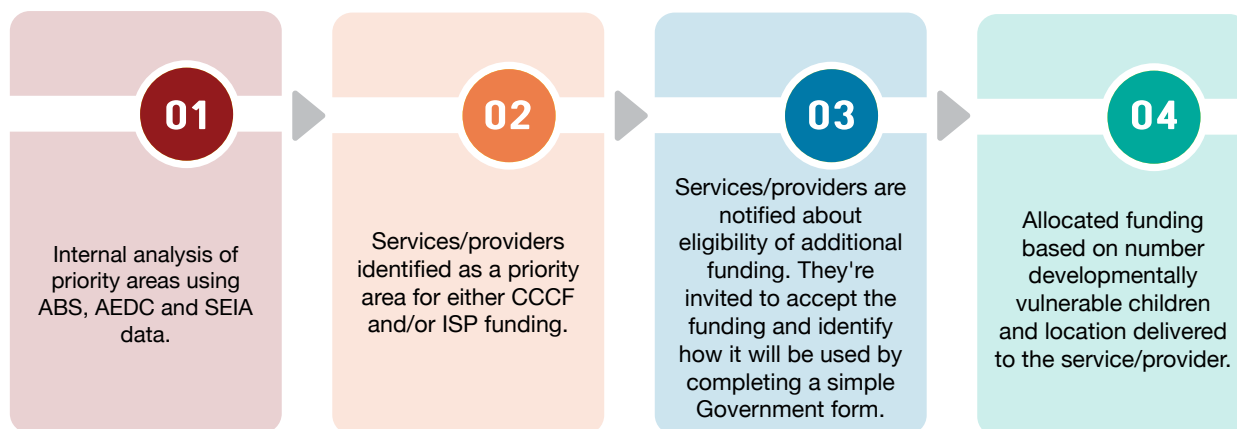
### The recommended solution

To capitalise on the current system, we recommend the Australian Government conduct a thorough review of the ISP and CCCF to ensure that it is adequately building the sector's capacity to provide the best tailored care for the benefit of all children. Within this review, we recommend that the government consider an additional element of the ISP funding, utilising the current priority areas model under the CCCF, which uses data from the Australian Bureau of Statistics (ABS), the AEDC and the Socio-Economic Indexes for Areas (SEIA). This proportion of ISP funding could then be divided based on the number of children experiencing developmental vulnerability. Funding can therefore be directed not only to the communities with the highest developmental vulnerability, but also to the specific services operating within the community, to deliver high-quality ECEC to the children who need it the most.

Forthcoming research from the Front Project will provide additional information about where children who are most vulnerable and disadvantaged live. We would welcome the opportunity to discuss our research and provide this as an extra resource to support the implementation of this recommendation, upon its release in early 2022.

This identification of priority areas will allow both the CCCF and ISP to move away from funding in the form of grants, to targeted funding as highlighted in Figure 1.

Figure 1: Proposed service centred funding model process.



While we believe that this model will be an effective way of engaging more developmentally vulnerable children in ECEC, consultation with the broader sector highlights that there will continue to be an ongoing need for children to have access to funded individualised support, specifically through the provision of an additional educator through the ISP. These individual supports should therefore remain available to be used for those who need it.

With this in mind, we also recommend that funding is allocated for additional educator requirements for children who qualify for the ISP to ensure that the needs of all children are met.

For this recommendation to be successful, ECEC services, educators and teachers must be genuine contributors to change in these policies, and the likely impact these changes could have on the ground, especially for those in regional, rural and remote areas.

## Benefits of the recommended solution

This localised support will create solutions for specific local needs, and avoid an ineffective ‘one-size-fits-all’ blanket approach to addressing developmental vulnerability in disadvantaged areas.

By supporting more vulnerable children in disadvantaged areas to access ECEC, there is a chance to intervene early and prevent developmental vulnerability in high-risk children.

## Related recommendations

This recommendation strongly aligns with Recommendation 2 and 3 in this submission.

The Early Learning and Care Council of Australia (ELACCA) highlighted in their 2021-22 Pre-Budget Submission that the grant application process for the CCCF was slow and uncertain, suggesting the model was not fit for purpose.

## Summary

Altering the support to service providers in disadvantaged areas, particularly in regional, rural and remote areas, and therefore supporting a large proportion of developmentally vulnerable children, allows for more children and families to access vital ECEC services.



## RECOMMENDATION 2

Expand the Additional Child Care Subsidy and work with communities to encourage more families to access the help they need to access ECEC.

## RECOMMENDATION 3

Revise the activities test to make sure no child misses out on ECEC, regardless of their parents' working circumstances.

### The opportunity

Removing barriers to ECEC for those most in need will break the cycle of disadvantage and increase workforce participation.

With the significant strides made in changes to the CCS and the UANP, the Australian Government can leverage off the current system to make sure no child misses out on ECEC, no matter their circumstances, through the Additional Child Care Subsidy (ACCS).

While approximately 285,500 Australian children under five lived in poverty in 2020 (Cassells et al, 2020), only 44,200 children (30,850 families) accessed the ACCS in December 2020 (DESE, 2021).

Disadvantaged children are more likely to live in families with a higher level of maternal unemployment, and are therefore eligible for fewer subsidised childcare hours (Kalb et al, 2018). Moreover, factors such as casual employment, family violence or mental health conditions may force parents to drop out of the workforce (Kalb et al, 2018). Crucially, children from low-income families have the most to gain from high-quality ECEC, with ongoing participation improving educational and health outcomes (Fenech & Skattebol, 2021).

While the Front Project welcomes the CCS changes announced in last year's budget, the CCS activity test still prevents many families from accessing the subsidy, especially those experiencing disadvantage. For children's social and educational outcomes, lack of access to ECEC could be detrimental for future development.

With inequality exacerbated due to the COVID-19 pandemic (Lee, 2021), the Australian Government must ensure families currently slipping through the cracks of our ECEC system have adequate support to send their children to high-quality ECEC services.

### The recommended solution

The Australian Government can leverage the current system by including additional targeted funding to concentrations of disadvantage, in addition to the current per-child focus.

In addition to the AEDC data, the Australian Government can identify families who are eligible for the ACCS, through families' use of the CCS, and their child's enrolment data to



determine whether they are living in a priority area for the pool of ACCS funding. Families could then be notified by the Government that they are eligible for the ACCS, and be given the chance to ‘opt-in’ to the ACCS.

Further, the activities test should be scrapped to ensure all families can access the ACCS, no matter their parents’ circumstances. Especially with the ongoing uncertainty of COVID-19 and the possibility of unemployment rising, developmentally vulnerable children should not be missing out on high-quality ECEC as a result.

Forthcoming research from the Front Project will provide additional information about where children who are most vulnerable and disadvantaged live, we would welcome the opportunity to work with Government to identify and develop costs.

## Benefits of the recommended solution

### Short-term benefits

Removing as many barriers as possible to ECEC for vulnerable children and their families will likely result in increased participation and allow parents and carers to return to work and/or study. Creating an ‘opt-in’ option for the ACCS could ease the process for families, and remove any stigma or shame about seeking additional support.

### Long-term benefits

Better access to ECEC through the ACCS can lead to increased economic benefits by fostering higher workforce participation and/or study opportunities for parents and carers. Considering the disproportionate high costs of ECEC for low-income families, additional access to subsidies could reduce the financial stress of more families experiencing disadvantage, and therefore boost local economies in regional, rural and remote Australia.

## Summary

By removing the barriers families face when accessing the ACCS, more vulnerable children will be able to access ECEC and have the best start in life, no matter where they live.



## RECOMMENDATION 4

Expand Paid Parental Leave for all parents to 26 weeks, with a ‘use it or lose it’ component.

### The opportunity

Improving Australia’s Paid Parental Leave (PPL) scheme for all parents will support more women to return to work, and more men to care for their children.

Government made significant strides in improving women’s workforce participation through the CCS changes announced in last year’s budget. However, many women are still having to make the choice between advancing their career, and raising their children with the current PPL scheme. Currently, 93 per cent of primary carers leave under the PPL is utilised by women, compared to just 6.5 per cent of men (WGEA, 2020).

Stifling women’s career progression can have significant repercussions for women later in life, particularly for women living in vulnerable or disadvantaged communities. For instance, older women (aged 55 and over) are the fastest growing cohort of people experiencing homelessness in Australia (Australian Human Rights Commission, 2019). A contributing factor to this trend is taking time out of the workforce to care for family, or taking time off work when falling pregnant (Mercy Foundation, 2018).

Supporting the additional ECEC supports recommended in this submission, we believe that improving the PPL scheme so that both parents take equal time off will not only support women’s financial future, but can boost the economy through higher workforce participation.

### The recommended solution

The Front Project supports the recommended solution proposed by Chief Executive Women (CEW) in their 2022-23 Pre-budget submission.

Specifically, we believe increasing the PPL scheme to 26 weeks, with a use it or lose it component will encourage greater shared caregiving and financial support for women.

Modelling by the Grattan Institute outlines the new-look PPL scheme should be designed as follows:

- Include a 6-week use it or lose it provision for each parent, plus 12 weeks to share between them as best suits individual family needs.
- Offer a bonus 2-weeks leave (to be used by either parent) if both parents take at least 6-weeks leave. (Grattan Institute, 2021)
- The estimated cost of the 26 weeks scheme, with PPL paid at the current minimum wage, would be \$600 million over a year (Grattan Institute, 2021). However, this investment would boost GDP by \$900 million a year in increased women’s workforce participation (Grattan Institute, 2021).



## Benefits of the recommended solution

Adjusting the PPL scheme is good for families, and good for the economy. This is especially true for those living in disadvantaged areas, where women are more likely to not have access to PPL schemes from their employer (Mundy, 2014).

Importantly, women have been hit hardest by job losses as a result of the pandemic, especially young women (CEW, 2022). Increasing access to this scheme will ensure that those women who are employed, can remain employed when and after they have a baby.

## Related recommendations

This recommendation is in-line with recommendation 1 in Chief Executive Women's 2022-23 Pre-budget submission.

## Summary

Improving Australia's PPL scheme will support the financial future of women, and build on Government's incentives to increase women's workforce participation through the CCS.



## RECOMMENDATION 5

Commission the Australian Competition and Consumer Commission (ACCC) to investigate ECEC pricing and the market, to make recommendations for developing robust price control measures to ensure ECEC remains affordable for Australian families, especially those living in regional, rural and remote areas.

## RECOMMENDATION 6

Adopt a system stewardship framework of leadership to ensure the sustainability and longevity of the ECEC sector.

### The opportunity

The Australian Government must act to prevent excessive fee increases by providers undermining the benefits to families of ECEC and any optimised CCS rate.

The average hourly childcare fee for all service types (excluding in-home care) reflected an annual increase of 2.5 per cent to March quarter 2021 (DESE, 2021). The price of ECEC has increased faster than general price growth over the past 15 years. This reflects growth in the cost of inputs, mainly labour and rent, which make up an average 60 per cent and 15 per cent of ECEC providers' total costs respectively (Wood et al, 2020).

For families experiencing disadvantage, especially those living in regional, rural and remote areas, high costs are one of the biggest barriers to ECEC for families and their children.

### The recommended solution

Over the **medium term**, we recommend an urgent investigation of ECEC pricing and the market – including into price control measures. This investigation will ensure the implementation of any optimised CCS benefits the intended recipients, through the provision of independent, verified information to families and a market study to ensure informed policy development.

The Government should direct the ACCC to:

- immediately commence monitoring and reporting on the prices, costs and profits across ECEC services to the Government, community and families; and
- undertake a market study and identify levers available to Government to mitigate long-term risk of excessive price/fee increases.

Over the **long term**, we recommend the Government consider taking a system stewardship framework of leadership. This would likely increase the oversight and sustainability of



the ECEC sector. Government can use existing levers such as regulation, accountability measures and price controls to ensure ECEC prices do not continue to skyrocket, and ensure affordability for all families, especially those experiencing disadvantage.

## Benefits of the recommended solution

A more comprehensive understanding of ECEC prices is required – i.e. an understanding of what is driving increases in the cost of delivery and whether, where or in what circumstances there are issues in the market structure. The ACCC is ideally placed to undertake this task.

The market study will underpin what the appropriate levers are for the ongoing monitoring and managing of ECEC prices and it will enable the Australian Government to be an effective systems steward. Any recommended changes should be implemented in the 2023–24 Federal Budget cycle.

- Government has a range of levers available to it as a systems steward. There are **explicit levers** – such as funding, regulation, eligibility to operate services, or conditions attached to funding – as well as more **subtle levers**, like setting policy objectives, monitoring supply chains, sharing data, and measuring outcomes.
- Used together and used well, **these levers can reap the benefits of a mixed-market approach and achieve the public good** (Productivity Commission, 2017). The recommended approach will provide the Australian Government with the evidence to inform a policy response and means to prevent excessive price/fee increases in ECEC based on the existing system and funding model and proportionate to the identified risk. This could range from light-touch responses (like allowing the market to respond to competitive pressures) to high-intensity responses (like price regulation).

Engaging in systems stewardship could provide the additional financial and non-financial supports needed to address the complex challenges and barriers to ECEC many face in disadvantaged, non-metropolitan areas. This could take similar shape to that in the aged care sector, where a local network has been established to improve employment opportunities in regional Australia, and better coordinate aged care services with other service systems (Australian Government Department of Health, 2021).

## Related recommendations

The recent **Royal Commission into Aged Care Quality and Safety** suggested system stewardship should be adopted in the system, to improve outcomes and access to services.

## Summary

Government's responsibility for funding the CCS means it must act to ensure that the CCS continues to meet the expectations of families to provide transparent and affordable access to ECEC, rather than to drive market distortions. The ACCC is ideally placed to undertake this task and to make such recommendations for reform as are required.

The Front Project is undertaking research on the role of the Government as a system steward in the ECEC sector, and will share the findings of this research mid-2022.

## RECOMMENDATION 7

Create a permanent emergency funding pool to ensure the sector is prepared for future external shocks like COVID-19, especially in regional, rural and remote communities.

### The opportunity

Creating a permanent pool of emergency funding will allow the ECEC sector to continue to operate in times of crisis.

Recent history has highlighted how vulnerable the ECEC system is to external shocks, obliging the Australian Government to intervene and ‘save’ the sector. This was most apparent in 2021 in the COVID-19 pandemic, and the collapse of ABC learning in 2008.

Resilience and sustainability of the sector is vital to securing outcomes for children and families, and the economy. The Australian Government recently spent \$234 million to save 6,250 childcare services in the middle of COVID-19 lockdowns (DESE, 2021). It is therefore clear that, as we continue to live with COVID-19, more services will need additional support to stay afloat.

We know that COVID-19 is here to stay well beyond the expiry of the gap fee waiver on June 30 (DESE, 2022). ECEC is especially vulnerable to further disruptions as children under 5 remain the last population group to be eligible for the COVID-19 vaccine. It is therefore imperative that emergency supports become a permanent part of the ECEC system, and are fit for purpose to support the sector get by in the interim. This is especially important in regional, rural and remote communities, where COVID-19 has the capacity to bring entire communities to ground.

Internal modelling of the impact of external shocks on ECEC services by the Front Project found that regional Australia is more vulnerable, compared to metropolitan and remote areas. Services in Regional Australia make up 43 per cent of sales and 33 per cent of financially stressed services, despite representing only 26 per cent of services overall. We attribute this to greater changes in unemployment, and because services are more likely to be standalone.

### The recommended solution

Building on the current system in place, the introduced emergency funding during the COVID-19 pandemic should be established as a permanent safety net for the ECEC sector. The eligibility and distribution of emergency funding should be re-designed to not just cover COVID-19, but also natural disasters like bushfires.

Allowing services to waive fees but not lose their income has proven to be an effective solution for both families and services. However, these additional supports should remain fit-for-purpose. We recommend re-designing the eligibility requirements to not only broaden the emergencies the payment will cover, but also ensure that the changing environment as we move into a stage of the pandemic where lockdowns are less frequent is reflected in the pool of emergency funding.

## Benefits of the recommended solution

Having additional permanent spending available to deal with future waves of COVID-19, especially in the next six months will allow ECEC centres to continue to provide the much needed support. For regional, rural and remote communities, who have battled bushfires and floods on top of the COVID-19 pandemic, emergency funding is vital to keeping ECEC services open for children and families most in need.

This is particularly important as these regional, rural and remote communities are not only more susceptible to natural disasters like bushfires, but ECEC services are also likely to be operating in thin markets. These services therefore have the most to gain from offering this additional support. While these services may be eligible for emergency grant funding under the CCCF, the current grant funding model is uncertain and not fit for purpose (ELACCA, 2021).

## Related recommendations

ELACCA has highlighted in their 2022-23 pre-budget submission the need for ongoing emergency funding for the ECEC sector.

## Summary

Emergencies in Australia will continue beyond the COVID-19 pandemic, and it is vital that the sector has the right supports to continue to provide vital education and care services, especially in regional, rural and remote Australia.



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