



Submission in response to the Productivity Commission Inquiry into Early Childhood Education and Care 2023

Submitted by: The Y Australia

Acknowledgement

The Y acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their elders past and present and extend respect to all Aboriginal and Torres Strait Islander peoples today. The Y recognises Aboriginal and Torres Strait Islander peoples as the first peoples of this continent and the islands of the Torres Strait. In doing so, we acknowledge our shared history; recognise the right to self-determination and the importance of connection to country. We acknowledge and respect the distinct Aboriginal and Torres Strait Islander cultural differences, beliefs, values and languages.





Executive Summary and Recommendations

With around 430 services across Out of School Hour Care (OSHC), Early Learning, Kindergarten and Long Day Care, the Y Australia (formerly the YMCA) is one of the largest providers of Early Childhood Education and Care (ECEC) services nationwide.

The Y welcomes the opportunity to draw on our extensive experience in providing this submission to the Productivity Commission (PC) to support its Inquiry into ECEC.

The Y commends the Australian Government for acknowledging the significance of ECEC as a vital component of the education system and its crucial role in fostering Australia's economic well-being. We are witnessing great momentum from the Australian Government to strengthen our approach to ECEC, evident in the establishment of this Inquiry, the development of an Early Years Strategy, the Australian Competition and Consumer Commission Inquiry and major budget investments in the sector.

The aim of this Inquiry is to find effective solutions that will pave the way for affordable, accessible, equitable and high quality ECEC that reduces barriers to workforce participation and supports children's learning and development.

The Y supports universal ECEC that enables all children to access educational, social and economic opportunities. In this submission, we have identified barriers to this access that warrant investigation and analysis by the Inquiry.

The Y believes it is imperative that ECEC is inclusive of all children and families, particularly those most vulnerable. The outcomes from this Inquiry must address the needs of all children and families; and play a part in addressing the disadvantage created by the historical injustices experienced by First Nations children, families and communities.

The Inquiry's terms of reference are silent on child safety but it is a critical driver of regulatory oversight of the sector. There are several opportunities to harmonise regulatory settings that will improve child safety outcomes and make for a more effective and efficient sector.

Workforce is one of the key challenges to the sector. The ECEC sector is labour intensive, depending on skilled staff. Demand for staff is increasing but so are vacancies with poor pay and conditions identified as key factors for shortages.

A high proportion of the ECEC workforce are women and their work is undervalued. This reflects the systemic undervaluation of work in industries dominated by women (especially 'care' industries) and contributes to the gender pay gap. Additional public investment is required to address these issues given service providers are highly dependent on government funding and highly constrained in pricing.

The Y looks forward to the expertise of the PC being applied to the ECEC sector and hopes that its findings and recommendations will assist the Australian Government in its critical task of sector reform. Reform that prioritises the education, well-being, and development of Australia's children and supports greater workforce participation and community engagement for Australian families.

Recommendations

1. Putting Child Safety First

There can be nothing more important in our ECEC settings than the safety of all children in our care. We need a sector that puts child safety first by:

- a. Ensuring all providers have workplace culture and practices in place that ensure children are safe and that our staff are appropriately trained.
- b. Developing a national child safety accredited training framework.
- c. Adopting national legislation to put in place the ten national child safe standards of the Royal Commission into Institutional Responses to Child Sexual Abuse.
- d. Establishing a national Working with Children Checks system.
- e. Harmonising and strengthening Australian mandated reporting processes and reportable conduct schemes.

2. Access and Inclusion is Critical

We support a universal ECEC sector that enables all children to flourish. If all Australian children and families are to be given the educational, social and economic opportunities of ECEC, regardless of location, culture, identity or language, then we need services that:

- a. Can be accessed seamlessly by families in a parent friendly environment that builds a strong sense of belonging and identity.
- b. Enable improved inclusion and diversity in ECEC settings.
- c. Are culturally sensitive and actively encourage First Nations identity, history, spirituality and kinship.
- d. Provide a resource rich environment that bring together all government services required for each child to thrive.

3. Funding for Better Outcomes

ECEC needs improved funding. Critical improvements cannot be achieved without additional, and sustained funding. Our staff are central to service quality, access and inclusion, but workforce shortages are a major challenge. Funding to the sector must recognise:

- a. That increased wages are needed to attract and retain staff.
- b. The value of investing in workforce training and development.
- c. That passing on of increased costs to providers or to parents will be detrimental to access and inclusion to services.
- d. The need to consult closely with service providers regarding specific funding reform proposals.
- e. The value of longer-term funding cycles to retain quality talent, maintain or improve physical learning spaces and provide consistency of care.

4. Supporting children and families

We need an ECEC sector that supports children and families by enabling:

- a. Evidence based practices that provide high-quality ECEC ensuring our children have the fundamental skills and the emotional and social readiness required for a rapidly changing future.
- b. Safe and inclusive Early Learning Centres (ELC), kindergartens and Outside School Hours Care (OSHC) spaces that support a child's learning journey.
- c. The opportunity for families to fully participate in their communities and the workforce.
- d. Active and meaningful engagement with children and their families during ECEC systems and policy design.

5. Supporting a quality care workforce

We need a professional workforce to provide the quality care children and families deserve by ensuring:

- a. We have highly trained and skilled staff supported by a funded workforce strategy and high-quality professional development.
- b. Workforce strategies address critical staff shortages, create secure jobs and provide a pipeline of future workers.
- c. Recognition of the importance of the ECEC workforce to Australia's productivity.
- d. Longer term funding cycles are encouraged to support secure employment in the sector.

6. The importance of providers

Like other not for profit providers, the Y's ECEC settings are in communities that we contribute to, and actively support. As a not for profit provider, it is in our DNA to invest back into the communities we serve. Government policy must:

- a. Recognise and protect the important role for not for profit providers in the sector and community.
- b. Ensure changes in policy, financial and regulatory settings for ECEC don't hinder, and in fact support, the capacity of not for profit providers to provide other critical services to communities, particularly those in need.

7. Regulating for better education and care

Education and Care Services National Regulations and National Quality Standards around the country provide critical legal safeguards for ECEC, however, they can be improved by:

- a. Supporting whole of government approaches that ensure continuity and smooth transitions for children as they move between different ECEC settings.
- b. Providing different assessment tools and support for different risk profiles and service contexts such as OSHC and Early Learning Centres.
- c. Reviewing inconsistencies with how staff ratios and qualifications are being regulated between the States and Territories in Australia, especially where areas like ratios and educator qualifications are not consistent.
- d. Supporting greater consistency between regulators in the application of the National Quality Standards.





1. Introduction

The Y values the opportunity to share its on-the-ground expertise to comment on the PC Inquiry into the Early Childhood Education and Care (ECEC) sector. As a not-for-profit movement that exists to support children, young people and the community across every state and territory in Australia; and across 120 countries globally, the Y is committed to supporting people from all backgrounds and walks of life to reach their full potential, with dignity.

The Y welcomes the PC investigation and the comprehensive scope of the terms of reference, which encompass vital issues requiring thorough scrutiny, including cost and availability, barriers that affect access to ECEC services, and ways to support better outcomes for children and families. An approach that prioritises enhancing outcomes for all young children is warmly welcomed.

2. About The Y

The Y (formerly the 'YMCA') in Australia is a social enterprise, operating in more than 680 communities, with 11,500 employees and over 16 million visits to our programs and facilities over the past year.

The Y's mission is to empower children, young people and communities Australia-wide to build a just, sustainable, equitable and inclusive world, where every person can thrive in body, mind and spirit.

The work of the Y in Australia is driven by our bold vision – to create systemic change for a better world with and for young people – across four strategic pillars, Community wellbeing, Meaningful work, Sustainable Planet and a Just World. Globally, the YMCA is the largest youth movement in the world, reaching 65 million people in over 120 countries, on every continent.

Across Australia, the Y offers a wide range of programs and services to support children and young people across their lifespan, in every state and territory.

The Y has an extensive footprint in early learning, kindergarten and OSHC across Australia, including:

- 56 Early Learning Centres
- 93 stand-alone Kindertgartens
- 248 Out of School Hours Care Programs.

Around 4,000 Y staff provide education and care to over 56,000 children. This means more than 36,000 families have the opportunity to increase their engagement in the workforce and community.

Around 7,300 of the children in our care are from culturally and linguistically diverse backgrounds and some 2,200 children in our care identify as First Nations.

Our workforce is dominated by women (88%) and just under a third are under the age of 30 years.

The Y across Australia is committed to drawing from its significant knowledge and experience relating to early years, to improve the lives of children and families.

The Y supports the Universal Declaration of Human Rights (1948), which declares that childhood is entitled to special care and assistance. As a signatory to the United Nations Convention of the Rights of the Child (1989), Australia must uphold the rights of the child at all levels of society, ensuring that every child is treated with respect and dignity and their voices are heard and valued.

Alongside the Alice Springs (Mparntwe) Education Declaration (2019), The Y recognises ECEC as the foundational level of Australia's education system, working in partnership with families to provide a solid basis for early development and learning. Australia must continue to strive to promote children at all levels of society and uphold their rights as proclaimed by the United Nations and the Alice Springs (Mparntwe) Education Declaration.



3. Child Safety

There can be nothing more important in ECEC than the safety of children. While child safety is not specifically mentioned in this Inquiry's terms of reference, the PC has been asked to consider sector regulatory settings, and child safety is a significant and critical component of that regulation.

It has been 13 years since the Community and Disability Services Ministers Conference agreed to progress a nationally consistent approach to Working with Children Checks (WWCCs). Eight years has passed since the Royal Commission into Institutional Responses to Child Sexual Abuse released its Working With Children Checks recommendations. More recently, National Cabinet endorsed a 2021 agreement to explore avenues to improve and promote national consistency of WWCCs.

It would be safe to describe progress as slow as we still have no national Working with Children Checks system.

The Y prioritises child safety and actively promotes the well-being and protection of all children in Australia. To ensure the safety of all children, it is crucial to implement rigorous measures for those working with young children. This includes the implementation of:

- A national Working with Children Checks system.
- A nationally accredited safeguarding program that includes standardised training for Educators, equipping them with the necessary knowledge and skills to effectively safeguard children.
- National mandatory reporting processes and reportable conduct schemes.
- Legislation to implement the ten National Child Safe Standards of the Royal Commission into Institutional Responses to Child Sexual Abuse.

This Inquiry provides an opportunity for the PC to review progress in this area and drive momentum on strong and consistent child safety regulation. The benefit to children and families is clear, but there are also benefits to providers through clear, consistent, national regulatory settings.

4. Access and Inclusion

The Y believes all children should have access to high quality affordable ECEC. While The Y applauds the Australian Government's 2022 decision to increase the Child Care Subsidy (CCS) from 85% - 90%, for some families, many Australian children still cannot access ECEC services. There remain systemic barriers that disproportionately affect vulnerable children who could greatly benefit from ECEC services.

The PC should investigate and report on steps that could be taken to dismantle the barriers. Action in these areas will improve every child's access to early learning as a right, not as an entitlement based on parental/carer employment status. Opportunities include:

- Simplifying the unnecessarily complex and time-consuming application and approval process for the CCS to enable families to access services in a timely and efficient manner and without increasing the administrative burden for providers.
- Extending the duration of the Additional Child Care Subsidy (ACCS) determination from 6 weeks to 13 weeks and up to 12 months for children in out of home care.
- Further exploration to move to a universal CCS rate of 90% under a model that is affordable and sustainable. Fully subsidised places must be considered for families experiencing vulnerability or disadvantage ensuring the system is weighted towards supporting these families.
- Removing the Activity Test, which poses a significant barrier for families seeking ECEC services, particularly single-parent, First Nations, non-English speaking, and low-income families who are more than five times more likely to be limited to one day of care (Impact Economics, 2023).
- Ensuring all children have a minimum entitlement to attend ECEC at least three days per week with more days available for children experiencing vulnerability, or for families who need it to support their participation in the workforce or for study purposes.
- Funding two years of preschool in all States and Territories through an integrated funding arrangement across all settings, reflecting both parental choices and child development needs.

5. Funding Issues

The ECEC sector requires an improved funding model to address workforce challenges and access to inclusive services. Reflections on the need for workforce investment are detailed in section eight of this submission (Supporting a quality care workforce). Recommendations relating to access and inclusion are detailed in section seven (Supporting children and families). This section highlights other funding reform opportunities.

In recent times there has been significant growth in the ECEC sector and this has made it an attractive investment opportunity for property developers and private investors. The current unplanned market means that private interests have the power to determine the location of ECEC services, to prioritise their return on investment, and set high sale prices and lease fees. These escalating costs are passed on to providers and families, resulting in rising fees and the erosion of CCS. Those living in rural and remote areas are often left without access to ECEC services.

In this Inquiry, the PC has the opportunity to investigate and make recommendations that focus on:

- The equitable distribution of services according to demand with a particular focus on over and undersupply
- Controlling the escalating costs of ECEC so the goal of access and inclusivity is not undermined and these costs are not passed on to families or providers.
- More planned approaches to the development of new ECEC services with a focus on remote, regional, and disadvantaged areas and opportunities to deploy flexible models to address unique challenges.
- The value of longer-term funding cycles to retain quality workforce talent, maintain or improve physical learning spaces and provide consistency of care.

- The value in consulting closely with service providers regarding specific funding reform proposals to fully understand effects on centre operations and reduce risks of unintended adverse impacts.
- Additional and sustained funding to support critical improvements across the sector including, increased wages, investment in workforce training and development and improvement to physical spaces (this issue is expanded on in section eight of this submission).

6. Supporting children and families

Despite being a wealthy country, the current educational and developmental outcomes for Australian children fall well below expectations. According to the United Nations Children's Fund (UNICEF) international report, Australia ranks 32nd out of 38 countries in childhood wellbeing. Recent data from the Australian Early Development Census (AEDC) shows an increase in the percentage of children who are developmentally vulnerable from 2018 to 2021. These facts emphasise the crucial need to ensure access to ECEC services for all children.

The Y supports a universal ECEC sector that enables all children to flourish with a focus on supporting vulnerable children and families. All Australian children and families must have access to, ECEC services, regardless of location, ability, culture, identity or language.

Extensive evidence highlights the disparities faced by First Nations children compared to their peers. As a nation, it is crucial that we prioritise the wellbeing of First Nations children, recognising the historical injustices they have endured and celebrating their rich histories as the world's oldest continuous living cultures. Additionally, it is troubling to observe that although Culturally and Linguistically Diverse (CALD) children constitute 20% of the population, only 11.1% are currently participating in preschool, as reported by O'Connell et al. in 2016. A concerted effort is needed to bolster the attendance of CALD diverse children in ECEC services. There is also anecdotal evidence that some ECEC services are refusing access to children with developmental delay or disability, due to a lack of financial support or lack of physical spaces to accommodate these children.

The Y believes that every child should be "school ready". A holistic school readiness program, blending play-based learning with intentional teaching, sets children on a path for a successful start to their educational journey. These early learning experiences facilitate a smoother transition to school and prepare children for the academic and social demands they will encounter. A positive beginning greatly enhances a child's overall school experience, fostering success both academically and socially.

Affordable and high-quality early learning opportunities are vital for fostering workforce participation and driving economic growth. Although Australia boasts high education attainment rates for women (one in two women aged 25 to 34 have a bachelor's degree), it currently ranks 70th globally in women's workforce participation, as reported by the World Economic Forum in 2022. One driver is the barriers numerous families encounter when attempting to access early childhood education and care (ECEC) services, hindering the ability of women to engage in the workforce.

To address this issue, it is imperative to ensure safe and inclusive access to ECEC services for all children, enabling their families to actively participate in their communities and the workforce. Opportunities to dismantle barriers were identified earlier in this submission.

¹ UNICEF, 2020, Global UNICEF report reveals shortcomings in delivering on children's well-being in Australia – Pandemic creates urgency to improve for the future, viewed 12 May 2023, <https://www.unicef.org.au/media-release/global-unicef-report-reveals-shortcomings>.

² Department of Education, Skills and Employment, 2021, Australian Early Development Census National Report 2021, Viewed 16 May 2023, <https://www.aedc.gov.au/resources/detail/2021-aedc-national-report>.

Early childhood education's influence extends beyond school readiness, with potentially lasting implications for economic and community involvement. To address these issues, the PC should investigate and make recommendations that ensure:

- Culturally responsive services are available and accessible to First Nations children to address their unique needs and those of their families and communities by working with Aboriginal Community Controlled Organisations (ACCOs).
- Support is provided to First Nations community service organisations to collaborate with ECEC services and provide consultation on how First Nations cultures can contribute to educational programs.
- The Inclusion Support Program (ISP) additional educator rate is aligned with award/EBA wages and the 25/40 hour caps are removed and instead are matched to the child's enrolment.
- Public funding to improve accessibility for children with additional needs enabling both:
 - facility upgrades, and
 - staff development (with a strong preference toward accredited training including toward micro credentials).
- Place-based models of service provision include the integration of support services (e.g. Speech Therapists, Psychologists etc) that enable clear and timely referral pathways for early intervention.
- ECEC services are culturally responsive and embed cultural responsiveness within the educational program.
- Investment is prioritised in evidence-based ECEC, so all children are school ready and equipped with the best possible foundation for their future.
- Provision of funding for two years of preschool in all States and Territories, ensuring children are ready to commence school.
- Sound early years programs are delivered that merge both play based learning and intentional teaching to ensure children have access to programs that support their development in all domains.



7. Workforce Issues

The Australian Government's recent announcement of a \$72.4 million investment to support the skills and training of educators in the ECEC sector is welcomed by the Y. This investment recognises that highly trained and skilled educators are fundamental to both a quality ECEC sector and to the achievement of broader social and economic outcomes.

The ECEC workforce plays a crucial role in enhancing Australia's productivity, and it is vital to ensure a skilled workforce both now and in the future. However, the sector is facing a severe shortage of workers due to poor pay, unfavourable working conditions, and high demand, leading to burnout. National employment projections for 2020-2025 indicate an increase in demand for ECEC services of upwards of 10%, exacerbating the shortage (National Skills Commission, 2022).

A high proportion of the ECEC workforce are women and their work is undervalued. This reflects the systemic undervaluation of work in industries dominated by women (especially 'care' industries) and contributes to the gender pay gap. Additional public investment is required to address these issues given service providers are highly dependent on government funding and highly constrained in pricing.

The Y strongly supports investment in the professional recognition and development of highly skilled ECEC workers. We believe ECEC workers should be valued for both their role in educating and caring for children, as well as the importance their work has for broader workforce participation and the economic benefits that flow from that. We would be keen to see programs that can attract more men to work in ECEC too, both to broaden the labor pool and address workforce shortages, and to understand how that might impact sector wages.

The PC has an opportunity to investigate and make recommendations on a number of issues that negatively impact workforce availability and quality including:

- An improved funding system that adequately covers the cost of quality, and ensures a qualified and respected workforce, with fair pay and conditions that reflect the importance of this work and are comparable with educators in the school sector.
- Undervaluation of care work by addressing the pay disparity.
- Further investment in the current ECEC workforce strategy should be fast-tracked and reviewed to ensure a focus on attracting, retaining and upskilling a qualified workforce across all jurisdictions and include a First Nations workforce scheme.
- Recognition of the importance of the ECEC workforce to Australia's productivity and future workforce by promoting and supporting appropriate remuneration and conditions.
- Educators are to be trained and supported to work with very young children (birth to 12 months) and those children with additional needs who do not qualify for ISP funding.
- Registered Training Organisations that deliver high quality training that accurately reflects the work being done by educators and meets the expectations of their roles. The Y welcomes the \$15.2 million investment in Y Careers announced in the 2023/24 Federal Budget as an important step in delivering a pipeline of skilled talent, strengthening employment and quality of care in the care sector.

8. Not-for-profit providers

Recent international studies conducted show investment in early childhood education yields a strong positive return. Recently, Price Waterhouse Cooper (PWC) conducted an analysis that showed an estimate that for every dollar spent on early childhood education, two dollars is returned, in benefit to the children themselves, to their parents/carers, to government and to business and the economy (PWC, 2019). Clearly early childhood education is a clever public investment mechanism for governments.

Australia uses a variety of service models for public investments including through public sector, not-for-profit and private sector provision. This Inquiry should investigate whether the current market-oriented model provides the best outcomes for Australian families, or whether high end profit margins could be better invested in public and not-for-profit sectors to improve service access, inclusiveness and quality.

The Y supports actions to rebalance the ECEC model with a stronger role for Government in stewardship, finance, regulation, planning and workforce stability. Australia requires a system that delivers better value for money for taxpayers and better outcomes for children and families.

The PC should investigate a number of opportunities to rebalance the system such as:

- Improving communication between all levels of government to enhance efficiency and effectiveness and reduce administrative burden, particularly on smaller not-for-profit organisations and ACCOs.
- Delivering a publicly funded system not reliant on a market-driven model, one that can deliver equal access and outcomes to all children, particularly children in disadvantaged communities or populations.
- Supporting not for profit and ACCO providers to build and deliver services in communities where there is a high demand but service gaps exist, and where children and families need more intensive support.

9. Regulatory Issues

The ECEC sector is already heavily regulated. The Education and Care Services National Law and Regulations, alongside the National Quality Standards, provide critical legal safeguards for ECEC, however, they can be improved by:

- Improving the approach to ECEC regulations and standards to ensure consistency in application across jurisdictions, including in respect of ratios and qualifications.
- Regulating appropriately for different settings such as ELC and OSHC.
- Supporting a whole of government approach that ensures continuity and smooth transitions for children as they move between different ECEC settings.

¹ Perry Preschool program, Abecedarian Program and Chicago Child Parent Centres (Schweinhart et al, 2005 and Sparling, n.d.).



10. Conclusion

The PC has the opportunity to make a significant contribution to the reshaping of the Australian ECEC system.

The Y strongly believes there should be a universal ECEC system, that ensures every child has equitable access to the educational, social, and economic benefits that ECEC provides.

Such a system would enable all children to avail themselves of the opportunities offered by ECEC, regardless of their postcode, background or circumstances.

This system would support children to thrive, both academically and socially, enhancing their long-term economic prospects. It would also support Australia's economic growth through increased workforce participation.

The system would invest properly in a strong and valued ECEC workforce and dismantle gender barriers.

This system has a significant role to play in addressing historical injustices against our First Nations by supporting both access to services and including First Nations children, families and communities in the development of service delivery.

This system would be a move away from the current market driven model to one that optimally utilises public investment to deliver accessible, inclusive and quality services to all children.

The ECEC system Australia's children deserve will ensure that every child in Australia thrives and reaches their full potential.

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