



2020-2021 Pre-Budget Submission

An Update

#BestStartInLife



July 2020





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Introduction

This pre-budget submission 2020-21 is presented by the Australian Childcare Alliance (ACA) to the Australian Government as an addendum to our previous paper submitted in December 2019.

As the national peak body in the Australian Early Childhood Education and Care (ECEC) sector, the Australian Childcare Alliance (ACA) represents more than 2,500 members, who care for more than 360,000 families throughout Australia.

We work on behalf of early learning service owners and operators, predominantly private, as a reputable source of evidence-based advice to policy makers and a trusted source of practical guidance and support to service operators and educators.

Whilst ACA's commitment to the early learning sector is unwavering, this revised submission acknowledges the dramatic impact of COVID-19 on all parts of the economy since the start of 2020.

Treasury has forecast that the jobless rate could reach 10.75% by December - the highest for 26 years depending on how businesses delegate jobs. At such a rate there would be 1.4 million people out of a job.

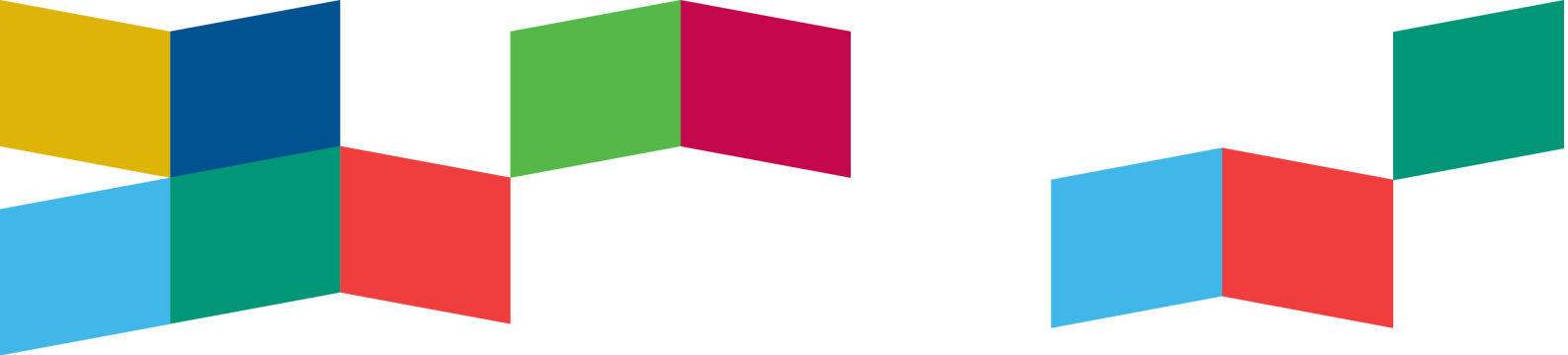
Wage growth is also expected to fall, having been revised down to 1.75 per cent and 1.25% - the lowest since ABS records were kept and well down on last year's mid-year update of 2.5%.¹

We are acutely aware of the ongoing health and economic crisis facing our country and the need to ensure that there is adequate support to allow the ongoing safe access to early learning for those families who need it. Throughout the pandemic, we have provided a safe haven for Australia's many children who need to stay in our ECEC services and stood shoulder-to-shoulder with the Minister for Education on finding economic solutions that have effectively saved the sector from imminent collapse.

Our immediate and shared priority has been to ensure the ECEC community can survive the unprecedented economic, social and health shocks that this global crisis has wreaked upon our beloved nation. This pandemic has pulled the curtain back on just how critical the ECEC sector is to supporting our economy and allowing all working parents - emergency and healthcare workers amongst them - to return to the workforce and contribute to the recovery and growth of our economy.

I would like to take this opportunity to commend the Prime Minister, the Hon Scott Morrison MP, Minister Tehan and the Australian Government for their tremendous leadership over the past few months. We honour the Australian families who have supported our members as we navigated this turbulent and frightening shifting landscape.

¹ 'Why unemployment could hit 10.75pc', The Australian Financial Review - <https://www.afr.com/policy/economy/why-unemployment-could-hit-10-75pc-20200723-p55e0f>



The Government's ECEC Relief Package, coupled with the JobKeeper Payment, succeeded in holding up the majority of the early learning sector when it was on its knees and, for that, we are tremendously grateful. We also greatly appreciated the Government's ongoing consultation with the ACA leadership to monitor the success of the combined funding support packages and address any unintended consequences of the funding models.

Whilst no one can predict how long this crisis will last; we do know there is now no doubt of the essential role our members continue to play in keeping our young children safe and educated and allowing their parents to return to work.

ACA welcomed the return of the Child Care Subsidy (CCS) funding model, which allows families greater access to early learning (childcare) while keeping the sector viable and sustainable.

With the recent spikes of COVID-19 across parts of Victoria and New South Wales, the ongoing need for a flexible, targeted and agile response is sadly underscored. We all need to be vigilant and prepared to move quickly with scaleable funding and policy levers, should the situation worsen or spread.

ACA also believes it is crucial that families, already facing hardship, are not overwhelmed by an administrative burden, as they try to ensure their children can attend their early learning service. The Prime Minister recognised this when he recently committed to cut any red tape that threatens to hamper our economic and social recovery.

As well as being the recognised bedrock of our fragile economy; it is now well recognised, locally and globally, that high quality ECEC improves Australia's children's health and wellbeing, helping them to develop strong social skills, resilience and approach a love of learning.² The health and developmental benefits of early learning to Australia's young children are now needed more than ever, and the long term benefit to our economy is exactly what policy makers need to focus on.

ACA is extremely proud of our work in supporting the early learning sector through this terrible COVID-19 crisis. We will continue to ensure that the families of essential workers, along with children from disadvantaged and vulnerable backgrounds, can access our ECEC services.

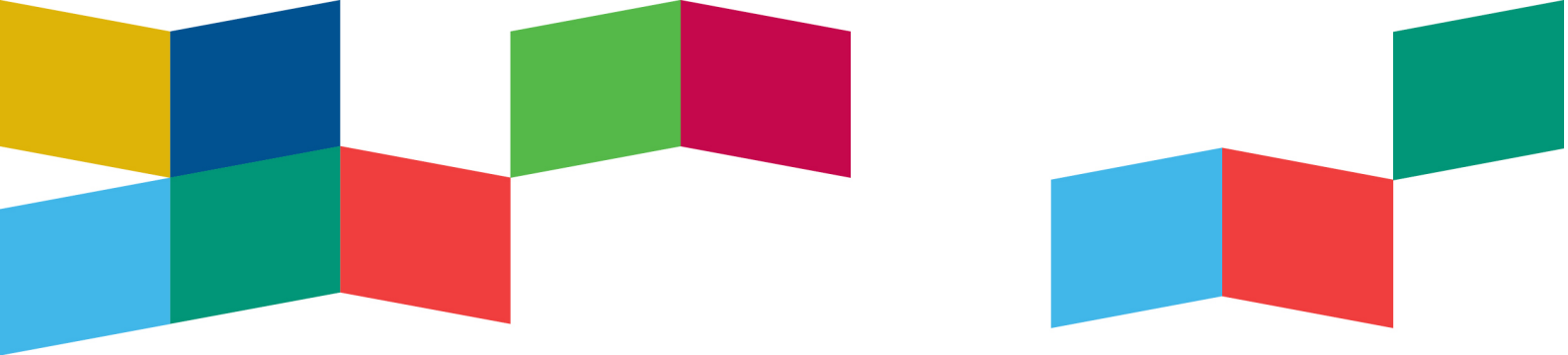
The critical issues and recommendations identified above are presented in the context of the priorities for the **2020-21 budget**.

ACA commits this updated Federal Budget 2020-21 submission for your consideration. We are committed to ensuring **every child in Australia** has access to high quality, affordable and sustainable early learning services, and therefore the **best start in life**.

Paul Mondo
ACA President



² Academic Research: The benefits of early learning and a play-based environment - <http://beststartinlife.org.au/wp-content/uploads/2019/02/References-Best-Start-In-Life-Academic-research.pdf>



Child Care Subsidy: Affordability & why our most vulnerable children need support

THE ISSUES

Supporting families in the COVID-19 climate

The shocking impact of COVID-19 on the Australian economy has brought to the fore the pivotal role that the early learning sector plays in supporting Australia's workforce participation. If our services had collapsed; one third of the Australian emergency and healthcare workers would have been forced home to care for otherwise healthy young children. Many vulnerable children would have been put at great risk as they are often safer in our centres than at home.

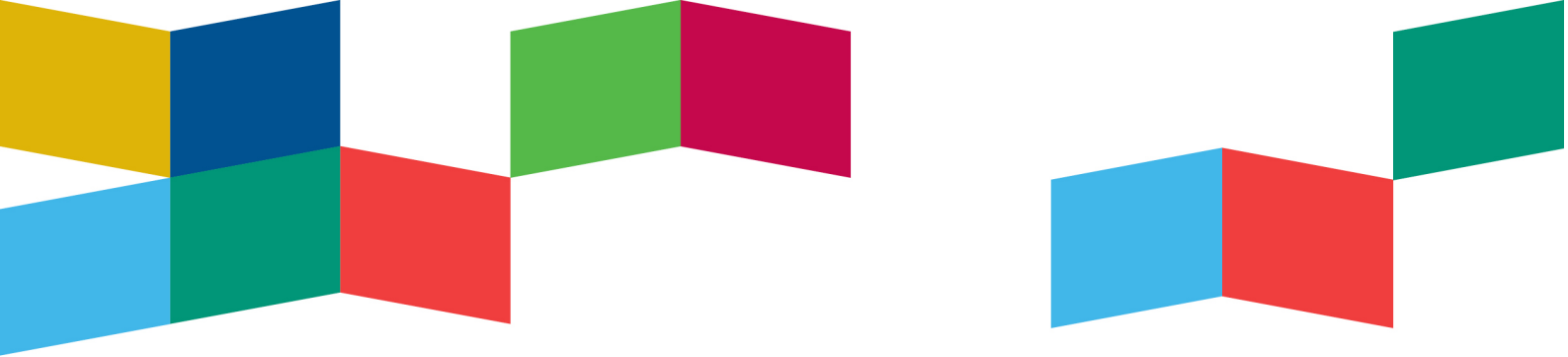
At the same time, never has it been more important to celebrate the evidence-based positive and important long-term outcomes for those children attending high-quality Early Childhood Education and Care (ECEC).³

These critical functions are not mutually exclusive, and ACA is keen to ensure that Australia's policy settings equally recognise the tremendous importance of the developmental outcomes of high quality ECEC alongside the significant workforce participation outcomes.

Under the Child Care Subsidy (CCS) system, the activity test was designed as a lever, to ensure that the CCS rewarded workforce participation. It is in this context, that under the current arrangement, a portion of Australia's young children do not qualify for a **minimum level of subsidised access** due to their family's work/life situation. Many vulnerable families do not meet the activity test, which significantly reduces their capacity to afford early learning services. This will now be exacerbated by the shock employment & economic downturn facing many Australian families. Some will recover. Many will not.

The ECEC Relief Package provided much needed relief to early learning services along with “free childcare” to prioritised families. However, the much-awaited return of the CCS brought its own challenges, with

³ Academic Research: The benefits of early learning and a play-based environment - <http://beststartinlife.org.au/wp-content/uploads/2019/02/References-Best-Start-In-Life-Academic-research.pdf>



Australia's unemployment rate increasing from 5.2% in January 2020 to 7.4% in June 2020⁴.

ACA acknowledges the additional support for eligible families doing less activity due to COVID-19. These parents can access 100 hours of subsidised care per child per fortnight until October 4th. Whilst this provision has allowed those impacted families to maintain the same level of access until October, there is no guarantee that these families will have resumed their previous levels of activity by then. There is a real risk that many of these families will join the cohort of families who were falling through the cracks pre-COVID-19. It is these vulnerable children who are most in need of high-quality early childhood education and care.

Therefore we recommend that this activity test exemption remains in place until the end of the financial year.

Additionally, ACA would be deeply concerned if families renounced opportunities for additional employment due to reaching their CCS cap, therefore reducing their contribution to the economy and their taxable income.

Removing the CCS annual cap and extending the activity test exemption until the end of the financial year would ensure that those families who want to work more would not be disadvantaged with increased costs beyond the cap. It is a short-term measure with long-term benefits to families and the economy.

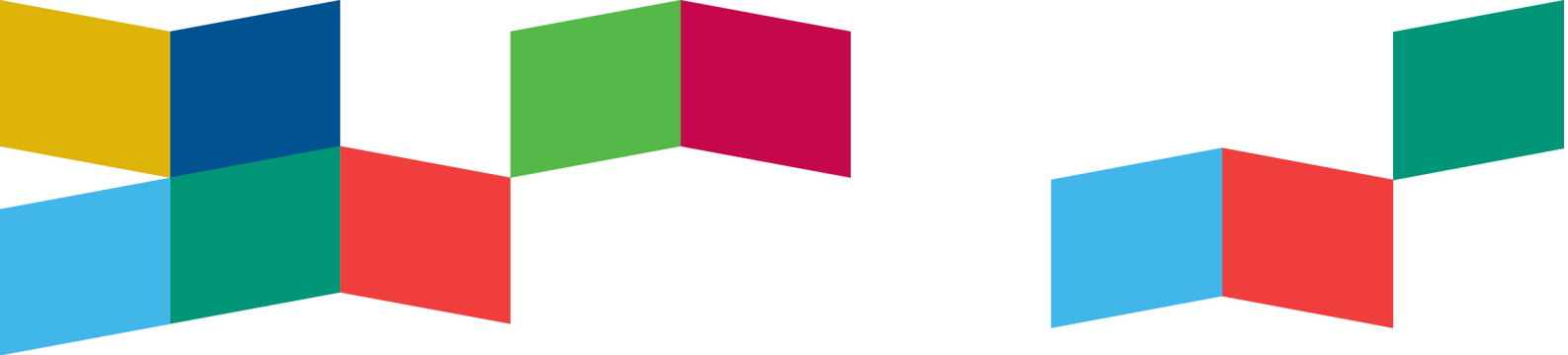
Ongoing difficulties of accessibility and affordability for families

The activity test has always been difficult for families to navigate and is unnecessarily complex, particularly for those families with varying work hours per fortnight, along with those not proficient in English.

Furthermore, accessing additional support via the Additional Child Care Subsidy (ACCS) Temporary Financial Hardship or Transition to Work mechanisms is notoriously difficult due to the current constraints in the system and the way in which they are administered by Services Australia. Families are required to apply for this financial support via Centrelink (Services Australia), which is a long, drawn out process at a time of heightened trauma and anxiety.

This creates a further barrier to families in need, at a time when Services Australia's resources are already stretched to capacity.

⁴ ABS Statistics - 6202.0 - Labour Force, Australia, Jun 2020 - [https://www.abs.gov.au/ausstats/abs@.nsf/7d12b0f6763c78caca257061001cc588/a8e6e58c3550090eca2582ce00152250!OpenDocument#:~:text=Australia's%20seasonally%20adjusted%20estimate%20of,points%20\(pts\)%20to%207.4%25%3B](https://www.abs.gov.au/ausstats/abs@.nsf/7d12b0f6763c78caca257061001cc588/a8e6e58c3550090eca2582ce00152250!OpenDocument#:~:text=Australia's%20seasonally%20adjusted%20estimate%20of,points%20(pts)%20to%207.4%25%3B)



We acknowledge that the Government has put measures in place via Services Australia to streamline this process and hope that these measures effectively support those families in need.

ACA also believes that with expected record levels of unemployment, the ACCS Transition to Work category should serve a prominent role for those families returning to the workforce. Lifting the household income threshold for qualification would target and support families through the arduous financial and emotional process of looking for and attaining new employment, whilst giving their households a chance to fully recover from the sudden financial impact of COVID-19.

Meanwhile the existing application process for the ACCS Child Wellbeing funding is also onerous in terms of the level of evidence required.

We would therefore like to see amendments to the application process reduces the burden of providing evidence for vulnerable families. Pressure would be further reduced on families, providers and state based agencies, if a service provider could simply use a letter from a General Practitioner (GP) or psychologist as evidence for a certificate and subsequent 26 week access for newly vulnerable children and their families.

In terms of evidence of barriers to access. according to Mr Richard Weston, chief executive of Aboriginal and Torres Strait Islander children's advocacy body SNAICC, many Indigenous community services reported increased enrolment during the “free childcare” period, with vulnerable children attending for more hours and some families accessing early learning and care for the first time⁵. This is a trend we need to support in the interests of these children and for the communities in which they live.

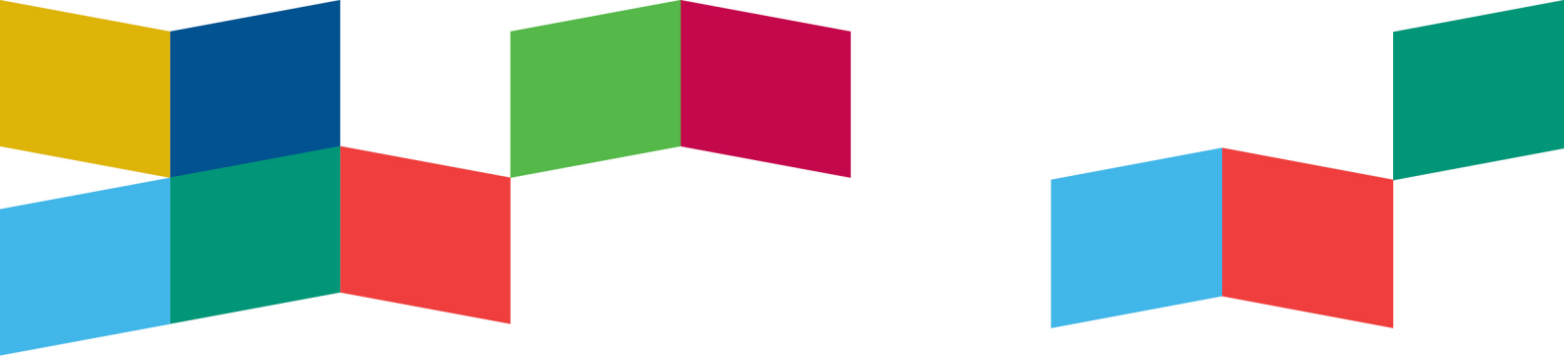
We also know from our ACA member feedback, that many families from disadvantaged and vulnerable backgrounds were able to access more days under this temporary model.

ACA would therefore support a no cost model for these specific cohorts, focusing on families who do not fit the category of Additional Child Care Subsidy (ACCS) Child Wellbeing, but are indeed disadvantaged.

Provision of back-payments to families - not service providers

Since the inception of the CCS, service providers have experienced problems regarding which party receives back-payments, in those instances where there has been a delay in the processing of a CCS application. Until the CCS claim has been processed, service providers find themselves in the difficult position of having to charge full fees to these families, who are often returning to the workforce and may not be able to meet

⁵ 'They are thriving': Free childcare boosted access for disadvantaged and Indigenous kids, Sydney Morning Herald, 12th June 2020 - <https://www.smh.com.au/politics/federal/they-are-thriving-free-childcare-boosted-access-for-disadvantaged-and-indigenous-kids-20200611-p551ne.html>



the significant cost of full fees, particularly without having received their first salary payment. In this scenario, service providers often provide some payment flexibility for these new families, despite the eventual CCS back-payments being paid to the family, rather than to the service provider.

The unintended consequence of this payment process is that the service provider is left substantially out of pocket, with no choice but to recover this amount directly from the family. Should the family fail to pay, the service provider has very little recourse to recover the debt. The eventual consequence is that service providers are unlikely to assist in similar circumstances in the future, excluding vulnerable children from access to quality early learning services when they need it the most.

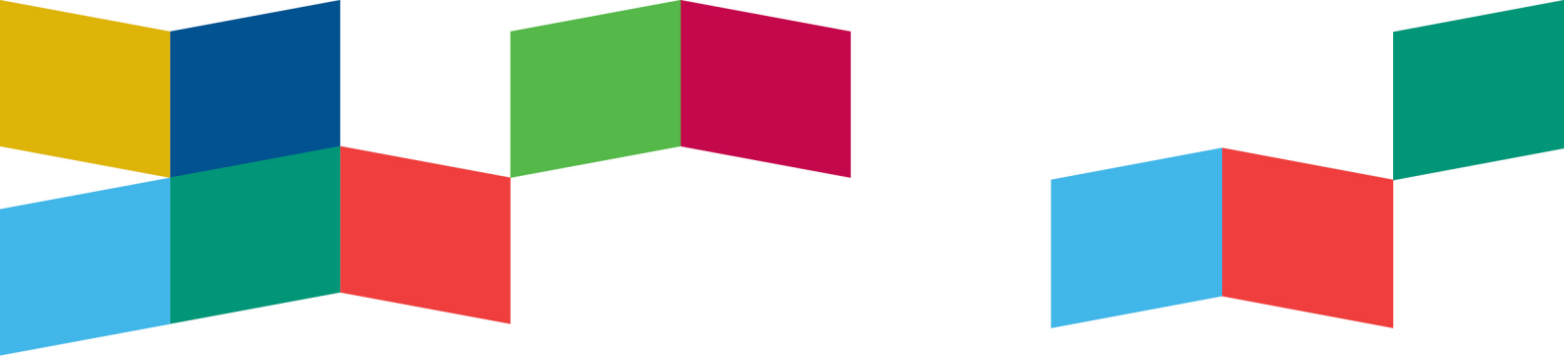
This is particularly pertinent in situations where an ACCS Child Wellbeing application is made in conjunction with a new CCS claim by the family. If the CCS claim is not processed prior to the commencement of that child, services are left in a situation where once both CCS and ACCS have been approved, the CCS is paid directly to the family, while the ACCS is paid to the service. Recovering this money from vulnerable families is extremely difficult and the only failsafe option for a provider would be to charge them the full fee until the approvals are in place. This situation does not work in the best interests of the children who need ECEC the most, and can have the opposite effect of discouraging participation for this vulnerable cohort.

Responding to periods of local emergency (COVID-19 or otherwise)

In learning from the current situation in Victoria, the combination of Transition Payments and waiving the gap fee for non-attending children has provided a safety net to support viability. If allowable absences were increased or further additional absence reasons were available, this would further solidify the existing support provided by government through any subsequent period of COVID-19-related Stage 3 lockdown. Specifically, it is important that should any parts of Australia experience a second wave of COVID-19 with the related Stage 3 restrictions, a 25% payment consistent with the Transition Payment should be made for the duration.

We would also recommend a new category of ACCS which would allow the Department of Education, Skills & Employment (DESE) to respond immediately and efficiently to local emergencies such as bushfires, COVID-19 spikes or other relevant circumstances in a targeted way. The funding could last for a set period, commensurate with the nature of the emergency, and be triggered by the service provider through the CCS System.

This new category would prevent the need for affected families to contact Services Australia to access emergency funding support, while at the same time relieving the administrative burden on Services Australia.



ACA believes that every child in Australia should have access to high quality, affordable and sustainable early learning services and therefore the best start in life. This includes those children from **vulnerable and disadvantaged** backgrounds.



SOLUTIONS

We call on the Government to:

Family focussed

- Extend the COVID-19-related activity test exemption until the end of this financial year.
- Remove CCS annual cap for the 2021 financial year.
- Amend CCS to support all Australian children, allowing all families access to at least 18 hours a week of subsidised high quality, affordable early learning services.
- Introduce a no cost model for disadvantaged and vulnerable families that doesn't involve the stigma and legal implications of the Additional Child Care Subsidy (ACCS) Child Wellbeing.
- Ensure that the assessment of ACCS Temporary Financial Hardship applications is realistic and attainable for those who need it.
- Introduce a new category of ACCS which would allow an immediate, efficient response to local emergencies such as bushfires, COVID-19 spikes or other relevant circumstances in a targeted way.
- Ensure that the ACCS Transition to Work funding support applies to families with an income up to \$100,000.
- Allow for more flexibility for ACCS Child Wellbeing to reduce the burden of providing evidence for vulnerable families.
- Allow for a targeted extension of allowable absences in areas experiencing a local emergency.
- Allow services to waive the gap fee for absent children in areas of local emergency.
- Provide more support for families from Culturally and Linguistically Diverse (CALD) backgrounds to navigate the complex CCS application process.

Service provider focussed

- Allow for a targeted extension of Transition Payments in areas experiencing a local emergency.
- Provide funding to allow for an IT solution that ensures subsidies flow directly to services on behalf of families as recommended by the Productivity Commission.



BENEFIT TO FAMILIES AND TAXPAYERS

- Continuity of access to early learning services for children whose parents' lives and workforce participation have been impacted by COVID-19.
- Increased participation of children from disadvantaged and vulnerable backgrounds.
- Parents would have the choice of early learning service type that **best suits and supports their work/family life needs**.
- Families would have a much **simpler, easier process** to access **immediate** subsidised early learning services.
- **All Australian children**, including children from **vulnerable and disadvantaged families**, along with those affected by the COVID-19 climate, would have greater access to high quality affordable early learning services, which have been proven to deliver greater outcomes both when they enter the school system as well as later in life.⁶

BENEFIT TO GOVERNMENT

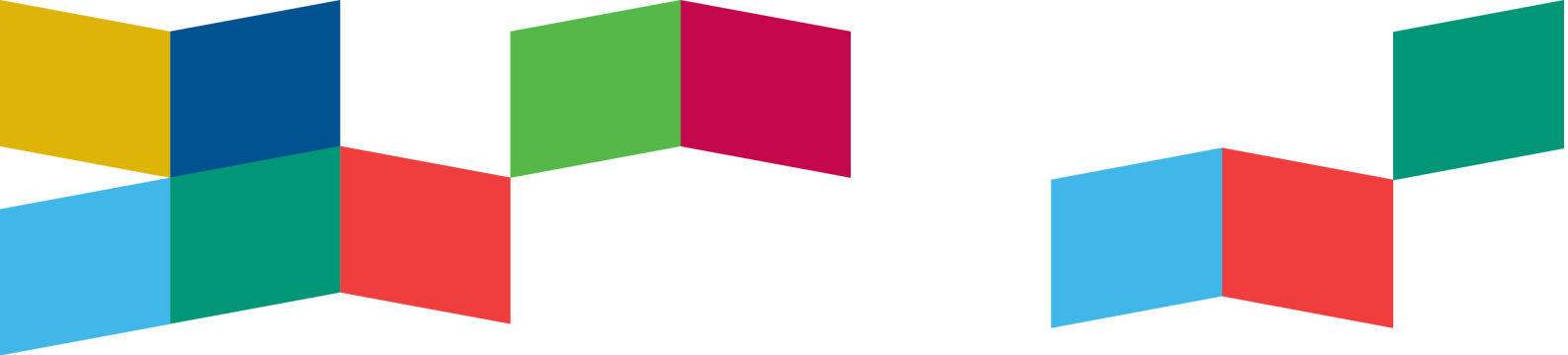
- In the context of COVID-19, the early learning sector would be able to fulfil its pivotal role in supporting Australia's economic recovery - the more affordable ECEC services are, the greater the contribution to the Australian economy from parents of young children.
- This approach would be a highly effective spend of taxpayers' dollars, with long term capital savings through a lower spend on human services by Government in the future:
 - Research has shown that by investing in quality early childhood education, children have better education, health and employment outcomes throughout their lives⁷. For every dollar invested now, Australia receives \$2 back over a child's life⁸.
- Every dollar spent on high-quality, birth-to-five programs for disadvantaged children delivers a 13% per annum return on investment. These economically significant returns account for the welfare costs of taxation to finance the program and survive a battery of sensitivity analyses⁹.
- Providing all children with a minimum level of access would reduce complexity in the system, making it easier and less expensive to administer by Services Australia (Centrelink).

⁶ <https://www.thefrontproject.org.au/the-evidence>

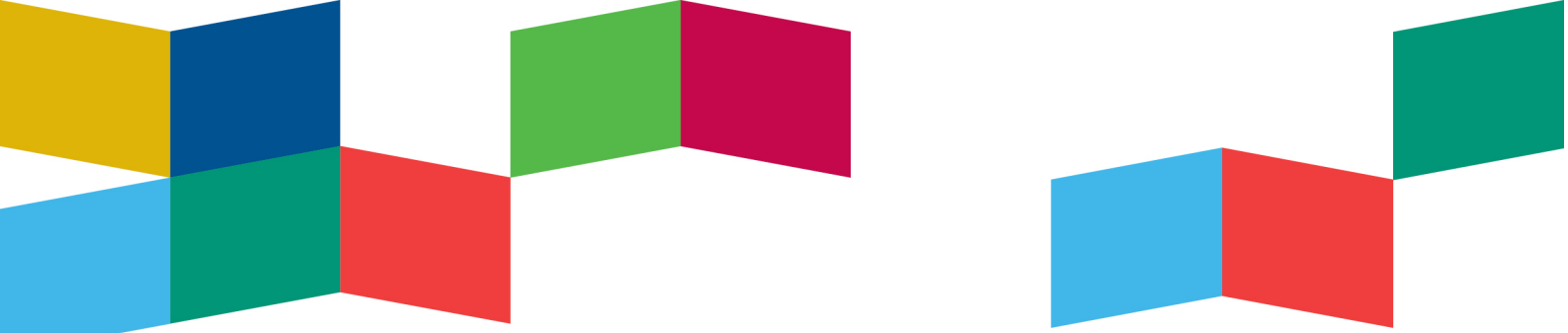
⁷ <https://www.thefrontproject.org.au/the-evidence>

⁸ A Smart Investment for a Smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia, The Front Project June 2019 - https://www.thefrontproject.org.au/images/downloads/ECO_ANALYSIS_Full_Report.pdf

⁹ The Heckman Equation - <https://heckmanequation.org/resource/research-summary-lifecycle-benefits-influential-early-childhood-program/>



- The provision of a **simpler, easier process** for families would translate to far less administration for Services Australia (Centrelink), creating substantial operational cost savings.



Preschool (kindergarten) education: A better future with earlier participation & equitable outcomes

THE ISSUES

Lack of certainty of funding

Under the Universal Access National Partnership (UANP) Agreement, the Australian Government provides funding to give all Australian children access to 15 hours per week of a quality preschool (kindergarten) program **in the year before school** (ie. for four year old children), which remains voluntary in Australia.

In addition to the funding dedicated to this initiative in previous financial years, the Australian Government has committed \$452.3 million to extend the National Partnership on Universal Access to Early Childhood Education until the end of 2021.

As identified in the Key Points of the recent UANP Review: Final Review Report¹⁰ commissioned by the Department of Education, Skills & Employment (DESE), over a period of ten years, the UANP funding has precipitated a significant increase in participation in quality preschool (kindergarten) by children in the year before school. While the number of children enrolled has increased significantly, the proportion enrolled for the target of 600 hours has also increased from 12% in 2008 to 96% in 2018.

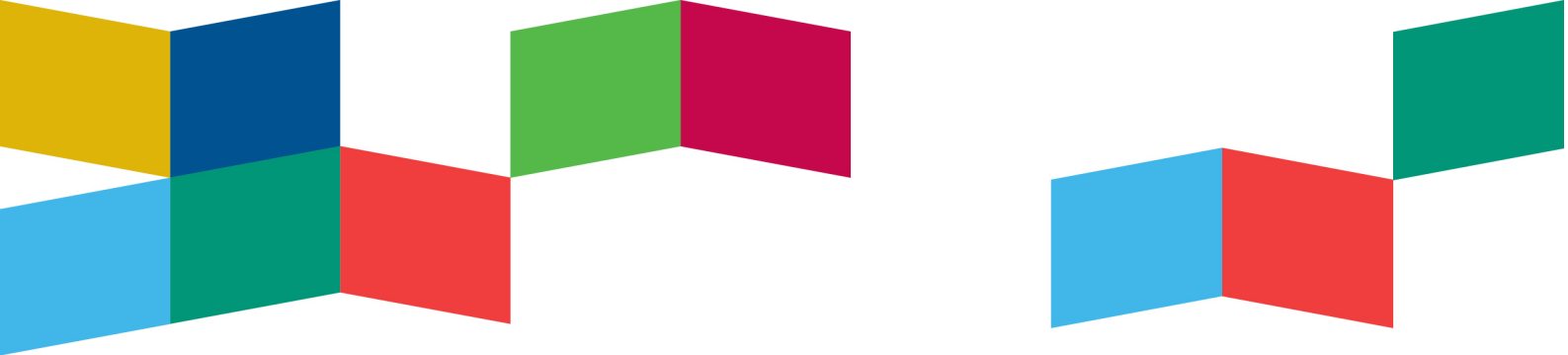
This is a **tremendous** outcome for Australian children, with the potential to have a profound and lasting impact on the youngest and most vulnerable Australians and their families.

There is a large international evidence base that demonstrates quality early childhood education makes a significant difference to life outcomes such as improving school readiness and performance at school¹¹, the

¹⁰ UANP Review: Final Review Report -

<http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/UANP%20Review%20Report.pdf>

¹¹ Academic Research: the benefits of early learning and a play-based environment - <http://beststartinlife.org.au/wp-content/uploads/2019/02/References-Best-Start-In-Life-Academic-research.pdf>



benefits of high quality preschool (kindergarten) programs are now well recognised and acknowledged locally and globally.

Whilst the Australian Government's extension of funding support to the end of 2021 is highly commended and greatly appreciated by the early learning sector, particularly in the context of dealing with the ongoing impacts of COVID-19, we would like to see a **long term commitment** to this funding, to ensure ongoing stability for families and their children in accessing high-quality preschool services in the year before school. The findings of the UANP Review: Final Review Report¹² have reinforced ACA's views that a long-term funding model is vital for the ongoing success of Australia's early learning program.

Governments should enter into a new five-year National Partnership from 2021 to 2025, and transition to a National Agreement from 2026 onwards.

The uncertainty associated with short-term agreements and performance-based payments has compromised the ability to plan and invest for the long term. - UNAP Review recommendation #6.

Unequitable distribution model

Despite this laudable funding support from the Australian Government, the Universal Access funding model is seriously flawed, resulting in a lack of national uniformity.

Since the inception of the agreement in November 2008 via the Council of Australian Governments (COAG), each State/Territory Government has taken a different approach to implementation. This has resulted in grossly inequitable outcomes for children, families and service providers across the country.

Our children deserve more.

Additionally, parents **must** have a choice of early learning service type that best suits their work/family life needs.

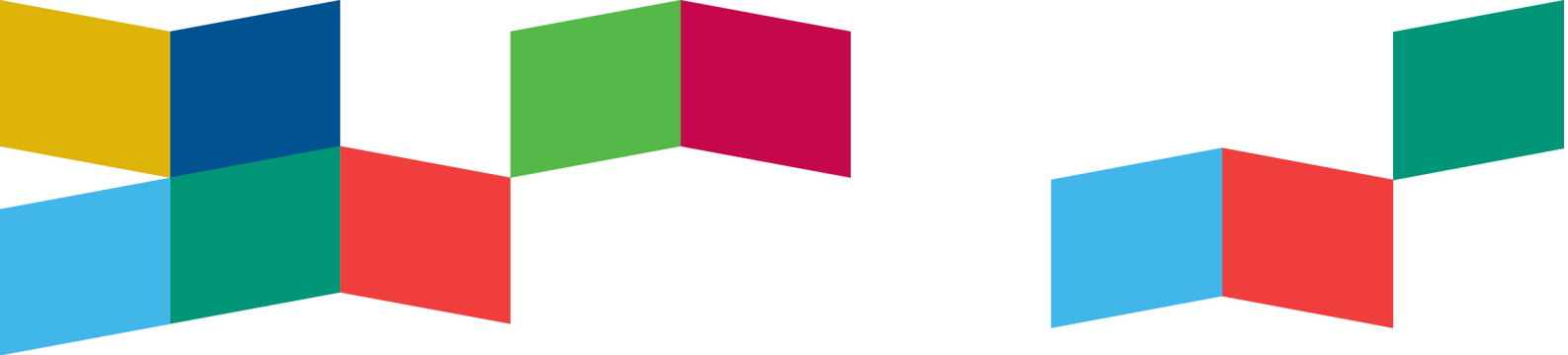
Australia currently has over 10,000 early learning services delivering preschool (kindergarten) programs nation-wide, with over 60% (over 6,800 services) of these programs being delivered by long day care centres¹³ (non-government centre-based day services).

¹² UANP Review: Final Review Report -

<http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/UANP%20Review%20Report.pdf>

¹³ Report on Government Services 2018, PART B, CHAPTER 3, Early childhood education and care,

<https://www.pc.gov.au/research/ongoing/report-on-governmentservices/2018/child-care-education-and-training/early-childhood-education-and-care>



ACA believes that co-locating early childhood education programs on school sites, which takes place in Western Australia, as a result of WA Government policy, **puts the needs of the children aged 0-5 years last** by limiting and decreasing the quality of play-based education and care in these environments.

Early learning (centre based, long day care) should be recognised consistently Australia-wide as the key provider of early childhood education in the year before school.

This is because:

- Early Learning (centre based, long day care) services offer the ideal learning environment for 0-5 year olds.
- It delivers age/developmentally-appropriate, tailored and culturally appropriate, physical early learning environments where children can also be bathed, have nappies changed and sleep.
- Early learning (centre based, long day care) is highly regulated. It is delivered under the National Quality Framework and the Early Learning Years Framework.
- Early learning (centre based, long day care) offers trained and qualified educators, both from the nurturing and education aspect.
Our educators are professionally trained, with at least two degree qualified teachers participating in the program and education of these children.

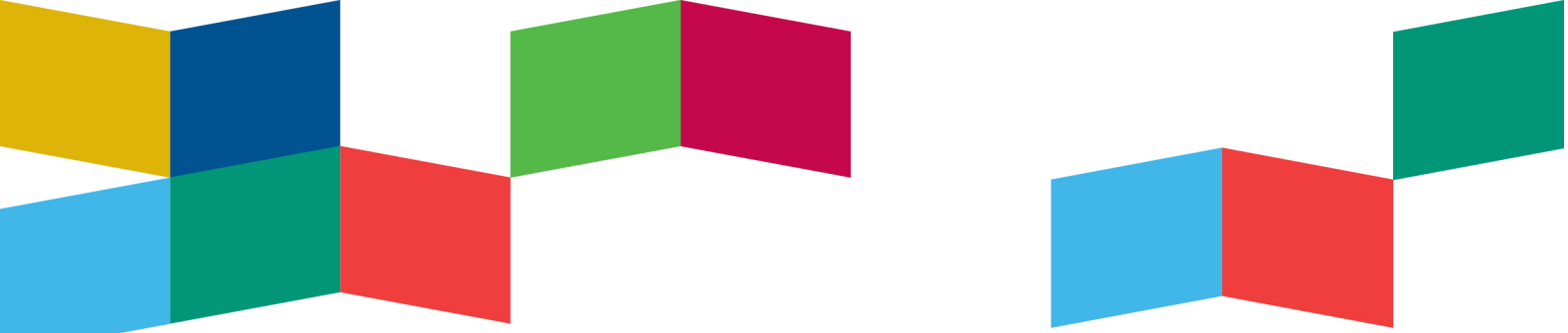
SOLUTIONS

We call on the Government to:

- Commit to a 5 year funding arrangement as recommended in the UANP Review: Final Review Report¹⁴ to provide a long term, sustainable model which ensures ensure that all Australian children have access to at least 15 hours per week of a quality preschool (kindergarten) program lead by tertiary qualified early childhood teachers, for 40 weeks per year in the year before school **regardless of type of service**.
- Modify the existing Universal Access funding model:
 - To provide both greater certainty of funding beyond year to year agreements; and
 - Deliver equitable funding to **all** children (ie. funding that follows the child) regardless of service type or jurisdiction. This would support preschool (kindergarten) programs delivered in all settings, including centre based, long day care.

¹⁴ UANP Review: Final Review Report -

<http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/UANP%20Review%20Report.pdf>

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- Extend exemption of the **Child Care Subsidy activity test** for children in their year before school to children in their **two years before school**.

With over **360,000 families** in our care, ACA believes **all of Australia's children** have the right to the **best start in life**.

BENEFIT TO FAMILIES AND TAXPAYERS

- **All Australian children**, including children from **vulnerable and disadvantaged families**, would have greater access to high quality affordable early learning services in their two years before school, which has proven to deliver greater outcomes both when they enter the school system as well as later in life. They would also be more likely to have stronger mental health and increased wellbeing and less likely to be involved in the criminal justice system.¹⁵
- Parents would have the choice of early learning service type that **best suits and supports their work/family life needs**.

BENEFIT TO GOVERNMENT

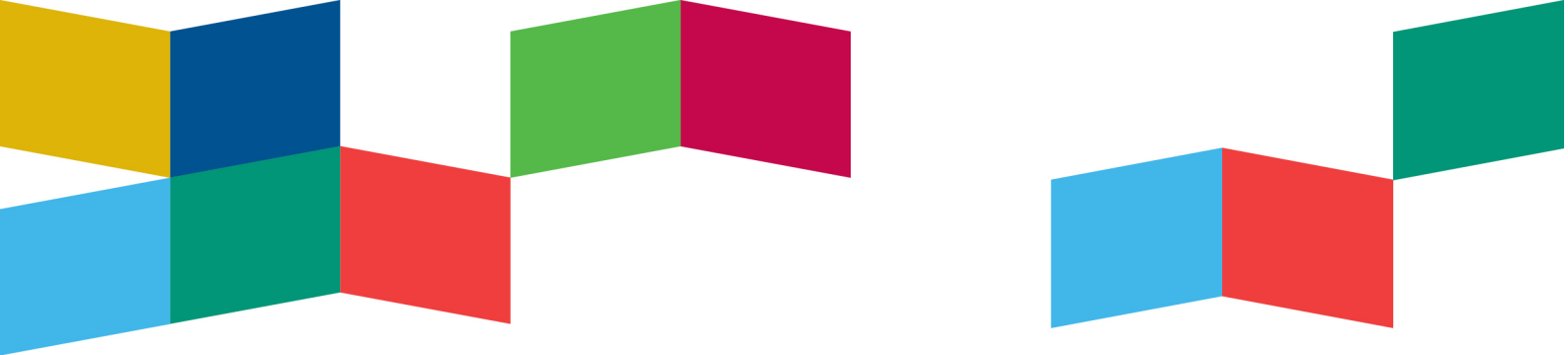
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¹⁷ A Smart Investment for a Smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia, The Front Project June 2019 - https://www.thefrontproject.org.au/images/downloads/ECO_ANALYSIS_Full_Report.pdf

¹⁸ The Heckman Equation - <https://heckmanequation.org/resource/research-summary-lifecycle-benefits-influential-early-childhood-program/>



Greater alignment of the provision of early learning services to support demonstrable need

THE ISSUE

Oversupply has become a growing issue in Australia's early learning sector. With few barriers to entry for new or existing providers to set up new centres, the saturation of early learning services in certain geographic areas has led to many services experiencing lower occupancy rates, impacting the level of quality provided and the affordability to families.

A 2018 report¹⁹ commissioned by the Australian Childcare Alliance (ACA), the Early Learning and Care Council of Australia (ELACCA) and Australian Community Children's Services (ACCS) revealed that the net increase in long day care centres in 2017 was roughly 2-3 times the estimated number of new centres needed per annum to meet future demand.

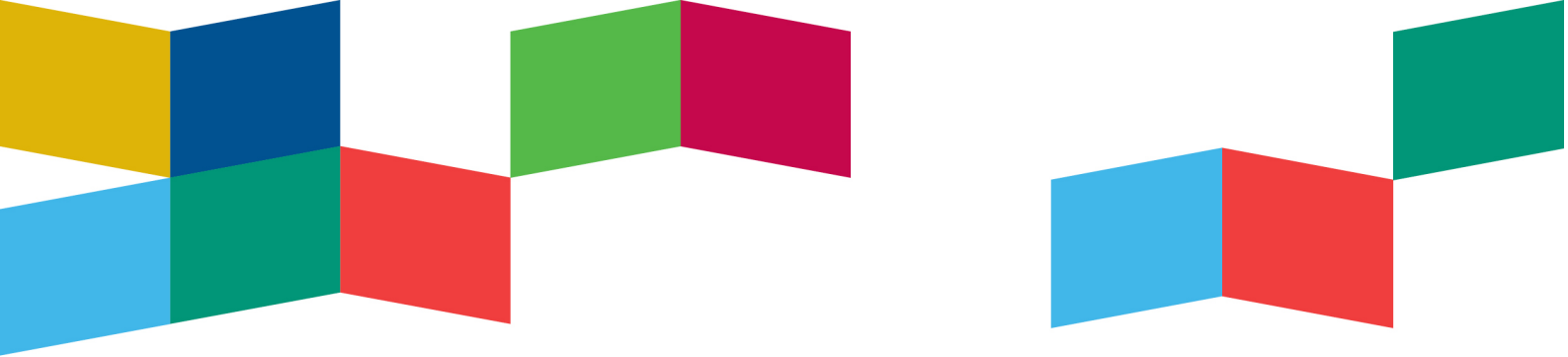
This is an alarming statistic - if the same growth continues in the coming years, there is likely to be an enormous impact on the quality of services and the viability of all early learning services, resulting in an increase in Government spending.

Planning data²⁰ predicts that there are currently over 1,000 new centres in the pipeline around the nation, which, if completed, could deliver another 90,000 childcare places in an already flooded market. Whilst we know that there are still some locations where demand outstrips supply, it is important for decision makers to be able to identify these few areas in need and understand how these particular communities can be better supported to supply the needs in that space, whether metropolitan or rural.

If not addressed, oversupply will lead to increased costs for families, an increase in Government spending and may have a negative impact on the quality of services in local communities.

¹⁹ Occupancy and Performance Appraisal: Early Childhood Education and Care Sector Report, <https://childcarealliance.org.au/aca-surveys/occupancy-report>

²⁰ According to data sourced from Cordell Connect - <https://www.corelogic.com.au/products>.



The early learning sector operates under a unique set of circumstances - families are subsidised by the Australian Government, while service operation includes a high level of fixed costs (wages, rent and mortgages). As a result, fees are relatively inelastic, and typically **do not decrease** with increased supply and competition.

ACA strongly believes that in this context, early learning services should only be made available where needed, as part of good, local community planning to allow for better access at a price that facilitates participation by all families, strengthens the local community and allows for sustainable, high quality services.

The Federal Department of Education receives vacancy reports weekly from all service providers and this information could prove highly valuable for informing the market as to areas of need, to ensure responsible and targeted new developments. The Department of Education has informed ACA that it cannot produce aggregated occupancy data reports because the Child Care Subsidy IT System has not been designed for this purpose.

SOLUTION

We call on the Government to:

- allocate funding to allow for the development of aggregated occupancy reports for specific regions such as clusters of postcodes or state electorates. Such reports would be invaluable to advise the market as to where oversupply and undersupply exist and therefore allow for careful town planning
- consider the application of legislation similar in theory to the Pharmacy Location Rules in the context of ensuring the provision of ongoing affordable, high quality early learning services to all Australian children by better aligning service provision to demonstrable need

BENEFIT TO FAMILIES AND TAXPAYERS

- Families would benefit through the ongoing viability, high quality and affordability of early learning services in their local area.

BENEFIT TO GOVERNMENT

- The ongoing viability, high quality and affordability of early learning services Australia-wide would ultimately prevent further Government spend on developing unnecessary infrastructure in certain geographic areas.



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