



DIVERSITY  
COUNCIL  
AUSTRALIA

# SUBMISSION

Early Childhood Education and Care

19 May 2023

Friday, 19 May 2023

## Early Childhood Education and Care

Dear Commissioners,

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace.

We have over 1,200 member organisations, reaching more than 20% of the Australian labour market.

Early childhood education and care (“ECEC”) is a critical workplace gender equality issue. Its workforce, which is largely comprised of women, experiences low pay and poor working conditions. This is also driving staffing shortages.

Lack of access to childcare is also a barrier to women’s workforce participation, and care, family and workforce participation is a major contributor to the gender pay gap.

This review is an opportunity to make significant systemic changes that would alleviate these issues and is therefore an opportunity to significantly improve workplace gender equality in Australia.

Please feel free to contact myself or Emily Tynan, Manager, Policy & Projects via email at [advocacy@dca.org.au](mailto:advocacy@dca.org.au), you require any further information about this matter.

Yours sincerely

**Lisa Annese**  
*Chief Executive Officer*

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# ABOUT US

## Who we are

**Diversity Council Australia (DCA)** is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We provide unique research, inspiring events and programs, curated resources and expert advice across all diversity dimensions to a community of member organisations.

## DCA's Membership represents over 20% of the Australian workforce

**DCA's prestigious group of over 1,200 members** is drawn from business and workplace diversity leaders and includes some of Australia's biggest employers. Our membership reaches over 20% of the Australian labour market.

## About our members

1,200 member organisations, including almost 40 ASX100 Listed companies.

Our members are drawn from across the corporate, government and not-for-profit sectors and vary from small to large workforces in size.

Our founding members include ANZ, AMP, BHP, Boral, Coles, IBM Australia, Myer, Orica, Rio Tinto and Westpac.

DCA's Members are listed on our website here: <https://www.dca.org.au/membership/current-dca-members>.

## Our belief, vision and mission

- Our **belief** is that diversity and inclusion is good for people and business.
- Our **vision** is to create a more diverse and inclusive Australia.
- Our **mission** is to encourage and enable Australian organisations to create diverse and inclusive workplaces.

## What we do

DCA, formerly known as the Council for Equal Opportunity in Employment Ltd, was established in 1985 as a joint initiative of the Australian Chamber of Commerce and Industry and the Business Council of Australia to demonstrate the business community's commitment to equal opportunity for women.

Our focus since then has expanded to cover all aspects of diversity in employment, reflecting changes in practice to embrace all areas of the diversity of human resources.

DCA is not government funded – its income is generated from membership fees, sponsorships and services to business/employers.

## Our Research

DCA works in partnership with members to generate ground-breaking evidence-based diversity and inclusion resources that enables Australian organisations to fully leverage the benefits of a diverse talent pool.

- **DCA research is grounded in the contributions of people with lived experience.** DCA projects use expert panels, focus groups, think tanks and surveys to make people with lived experience central to the project findings.
- **DCA resources are ahead of the curve.** They establish leading diversity thinking and practice, enabling Australian organisations to re-imagine and reconfigure the way they manage talent in today's dynamic operating environments.
- **DCA resources drive business improvement.** They are high impact, driving business improvement through providing evidence-based guidance on how to fully leverage the benefits of a diverse talent pool.
- **DCA resources are practice focused.** They respond to the information needs of industry leaders and the people they employ.
- **DCA resources speak to the Australian context.** DCA projects generate leading diversity thinking and practice that speaks to Australia's unique and distinctive institutional, cultural and legal frameworks.
- **DCA resources considers all diversity dimensions.** The full spectrum of diversity dimensions are investigated including age, caring responsibilities, cultural background and identity, disability, Aboriginal and/or Torres Strait Islander status, sexual orientation, gender identity, intersex status, social class and work organisation.

# POSITIONING

## The importance of taking an intersectional approach

Intersectionality refers to how some people experience compounded discrimination due to multiple marginalising **and** interlinked characteristics.

DCA's work over many years has recognised how intersectionality impacts the experiences of diverse women in Australian workplaces. For example:

- DCA, WGEA & Jumbunna's research, *Gari Yala: Gendered Insights*<sup>1</sup>, found that Indigenous women who are also carers experience 'triple jeopardy'. That is, the combination of these three aspects of their identity overlap to amplify their experiences of discrimination and exclusion at work.
- DCA's *Culturally and Racially Marginalised (CARM) women in Leadership*<sup>2</sup> research explored how the intersections of two key marginalising characteristics - race and gender - are still operating in workplaces to lock CARM women out of leadership:
  - Fewer career opportunities: 65% of surveyed CARM women agreed that CARM women employees received fewer opportunities for career advancements than other women.
  - Subjected to a higher bar: 85% felt they had to work twice as hard as employees who weren't CARM women to get the same treatment or evaluation.
  - Underestimated: 75% reported that others assumed they worked in a lower status job than they did and treated them as such.
  - Overlooked: 65% felt they were ignored or not taken seriously by their managers because of being a CARM woman.
  - Racism and sexism: 61% reported experiencing racism at work in the past 2 years, while 48% had experienced sexism at work over that same period.
  - Isolated: 77% of CARM women surveyed agreed or strongly agreed that decisions about hiring and promotions are made through informal networks, which they struggled to access.

It is critical that in reviewing early childhood education and care, that legislators, policymakers, and those implementing such policies, understand intersectionality, and take an intersectional approach implementing such policies.

## A note on binary language used in this submission

While gender does not exist only in binary categories, these categories still have very real effects.

However, DCA recognises that there are people whose experiences and identities cannot be captured by the use of binary language, and these limitations should be acknowledged whenever binary language is used.

# SUMMARY

DCA supports the government's view that "ECEC is an essential part of Australia's education system and is integral to Australia's economic prosperity as a powerful lever for increasing workforce participation."

Early childhood education and care is about so much more than simply enabling workforce participation for parents. It has important social and community benefits, and plays an important role in children's education, health, and development. However, as a workforce diversity and inclusion organisation, our submission focuses on how childcare impacts workplace gender equality.

We believe this review is an opportunity to consider and explore solutions to a number of issues with Australia's current system. First, the cost of childcare in Australia is amongst the highest in the OECD.<sup>3</sup> DCA supports finding ways to make childcare more affordable for families, but questions whether merely increasing subsidies will be effective. Previous increases to the childcare subsidy ultimately failed to make childcare more affordable, as increasing fees negated the benefit of the subsidy.<sup>4</sup> This review should consider alternative funding models, in order to make ECEC truly affordable for families.

Second, on top of being expensive, families often also struggle to find childcare places that match their needs and wait times for spots in childcare centres are increasing.<sup>5</sup> Research shows that the availability of childcare places is highly dependent on the postcode, with regions characterised by lower socioeconomic status having fewer childcare places per child. This review should consider how targeted action could lift childcare availability in the regions with the lowest level of access per child.

Third, the ECEC sector is experiencing significant staffing shortages, driven largely by low wages and poor working conditions. This is because traditional gender norms surrounding caring, with childcare being seen as "women's work", leads to the undervaluation of paid caring roles and low award wages in the childcare sector.<sup>6</sup> Australia's complex funding model also poses a barrier to achieving better and fairer pay for ECEC workers.

Fourth, lack of access to childcare remains a significant barrier to women's workforce participation, and time out of the workforce due to caring responsibilities is a major contributor to the gender pay gap. This review is an opportunity to consider how to improvements to childcare can help lift women's workforce participation and help close the gender pay gap. Further, there is an opportunity to promote gender equality, not just through boosting women's workforce participation, but also through increasing men's participation in caring. The Commission should consider how to break down barriers and address stigma, in order to encourage more men to take on more childcare.

Finally, the review should consider the significant benefits of improving ECEC in Australia, as investing in ECEC is good for women and the economy.



# INTRODUCTION

## Let's Share the Care



DCA's [Let's Share the Care at Home and Work](#), released in 2019, is a call to action to end the gender pay gap by enabling women and men in Australian families to 'share the care' more equitably. This research explores how the gender impact of caring is an important driver of the gender pay gap.

### What's needed to share the care and close the gap

- Recognise unpaid care and work by measuring it,
- Reduce the burden of unpaid care and work through investments in physical and social infrastructure, and
- Redistribute the work through policies that encourage men to take up more care work.

The report identified key actions for government, employers, and families. It calls on the government to:

*Ensure affordable, available, flexible and accessible universal childcare. Universal access ensures that all families can access quality childcare, in a form that meets the needs of children, parents and community, and at a cost that does not present a barrier to participation.*



## She's Price(d)less – 2022 Update Report



[She's Price\(d\)less: The Economics of the Gender Pay Gap](#), prepared with KPMG and the Workplace Gender Equality Agency (“WGEA”), is the fourth in a series of reports based on econometric modelling applied to data from the Household, Income and Labour Dynamics in Australia (HILDA) Survey to unpack the factors that contribute to the gender pay gap.

This report identified that the top three drivers of the gender pay gap were:

- Gender discrimination (36%)
- Care, family and workforce participation (33%)
- Type of job (24%)

The report also identified “addressing wage inequality in feminised industries” and “increasing availability of childcare and decreasing cost” as action that will help close the gender pay gap.

## DCA's view on the scope of the review

The call for submissions states that:

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

Yet it also says that the commission should consider “a universal 90 per cent child care subsidy rate.”

It is difficult to see how ECEC can be to be truly universal and affordable in the tradition of Medicare within the current mixed system of for-profit, not-for-profit and community care, which is paid for by families and subsidised by the government. We believe that for ECEC to be truly accessible and inclusive, it should be directly funded in the same way that public schools are funded.

The current mix of for-profit, not-for-profit and community care does not provide for a consistent and available system that ensures all families have access to high quality ECEC, further entrenching inequity. Families in lower-socio economic areas are missing out. And there is evidence that for-profit centres perform worse when it comes to safety and compliance.<sup>7</sup>

All efforts to reform subsidies and tax benefits are only tinkering at the edges, and past reforms have failed to deliver the promised results. Furthermore, those subsidies only benefit certain families, i.e., those who are actively seeking ECEC, usually out of necessity due to work responsibilities. Instead, the government should promote a philosophy where all Australian children can engage with thoughtful and enriching early childhood learning no matter their life circumstances and as a consequence of this, families are liberated to pursue work and other endeavours.

While our response to the terms of reference below is aimed at helping to improve the current system, we urge the Commission and the Government to radically reimagine how ECEC is funded and delivered in Australia. This would benefit children and their families as well as the people who work in the sector.

# DCA'S RESPONSE TO TERMS OF REFERENCE

Early childhood education and care (ECEC) is about so much more than simply enabling workforce participation for parents. It has important social and community benefits, and plays an important role in children's education, health, and development. However, as a workforce diversity and inclusion organisation, our submission focuses on how childcare impacts workplace gender equality.

## Issues with Australia's current system

### Availability and affordability

Efforts to improve childcare in Australia need to address affordability and access to high-quality ECEC.

In their report, [Childcare Deserts & Oases: How Accessible Is Childcare in Australia?](#), the Mitchell Institute found that when it comes to accessing high-quality childcare, location significantly impacts the availability of childcare services. The Mitchell Institute report found that childcare services are less accessible (i.e. there are fewer childcare places per child) in regions characterised by lower socioeconomic status and more accessible in areas with higher socioeconomic status. This is significant because high-quality ECEC plays a vital role in fostering future success for children, particularly those experiencing disadvantage. Therefore, access is more difficult for families who stand to benefit most from ECEC.<sup>8</sup>

**RECOMMENDATION 1:** As ECEC was found to be more accessible in neighbourhoods where there are higher fees, the Commission should consider role of the current funding model in perpetuating inequality in access to ECEC.

This report also showed a correlation between the accessibility of childcare and female workforce participation in a given area. And while the factors contributing to this correlation are multifaceted, a lower level of female workforce participation in a specific area can impact the demand for childcare. However, the challenges in accessing childcare services may also result in parents and caregivers opting out of the workforce during the early years of their children's lives.<sup>9</sup>

**RECOMMENDATION 2:** The Commission should focus on finding solutions to addressing lack of access to high-quality ECEC in "childcare deserts".

**RECOMMENDATION 3:** The Commission should investigate whether improving the accessibility of high-quality ECEC in areas with lower female workforce participation rates could help lift those participation rates.

### Lack of access to ECEC is a barrier to women's workforce participation

The lack of high-quality ECEC remains the largest barrier to women's workforce participation. According to the Australian Bureau of Statistics:

*"In 2020-21, there were 250,000 women who wanted a job or to work more hours but were unavailable, of whom 61,600 (25 per cent) indicated that **caring for children** was the main barrier. It was highest for women with children under 15, with more than half (56 per cent) reporting this as their main barrier to work or working more hours."*<sup>10</sup>

Further, our research report, [She's Price\(d\)less: The Economics of the Gender Pay Gap](#), showed that care, family and workforce participation is a key driver of the gender pay gap. This report identified "increasing availability of childcare and decreasing cost" as actions that will help close the gender pay gap. This research also showed that closing the pay gap driven by care, family responsibilities and workforce participation, is equivalent to \$319M per week in national earnings.

RECOMMENDATION 4: The Commission should investigate how improvements to ECEC can help enable women's workforce participation and help close the gender pay gap.

### Staff shortages and low wages for ECEC staff

The role of early childhood educator is one of Australia's lowest paid jobs.<sup>11</sup> Pay inequality is prevalent in caring professions, with wages being considerably lower compared to jobs that require similar levels of qualification:

*"Workers in the female-dominated care sector earn on average one-quarter to one-third less than their similarly qualified counterparts in male-dominated industries such as manufacturing, transport and construction."*<sup>12</sup>

Low wages for early childhood educators defies the principles of supply and demand. Despite staff shortages and job vacancies in childcare occupations being at a record high, wages in this profession remain stubbornly low.<sup>13</sup> This is also despite the pandemic reinforcing how essential ECEC is to the community and the economy.<sup>14</sup>

This begs the question: **what is keeping childcare wages so low?** Essentially, traditional gender norms surrounding caring, with childcare being seen as "women's work", leads to the undervaluation of paid caring roles and low award wages in the childcare sector.<sup>15</sup>

RECOMMENDATION 5: The Commission should investigate how to ensure that childcare work is properly valued.

RECOMMENDATION 6: The Commission should investigate how to achieve better and fairer pay and better conditions for childcare workers.

Australia's complex funding model also poses a barrier to achieving better and fairer pay for ECEC workers.

Funding for ECEC comes from several sources:

- the Australian government through the childcare subsidy,
- state governments who contribute to preschool, and
- families who pay the remaining fees.

Wages are then set by employers within various industrial agreements.

As Jen Jackson, Program Director, Centre for Policy Development, and Associate Professor of Education, Mitchell Institute, Victoria University, explains:

*“This means educators’ wages and conditions are everybody’s problem and nobody’s problem. Former Education Minister Dan Tehan has said paying educators more is up to employers. Employers and unions argue governments need to contribute more funding to the sector before educators’ wages can increase.*

*“Families are already stretched, and passing costs on to them seems unthinkable in the current economic climate.”<sup>16</sup>*

**RECOMMENDATION 7:** The Commission should investigate whether Australia’s complex funding model contributes to low wages in the sector, and whether streamlining funding responsibility could help to support fairer wages.

Low wages are contributing to high turnover in the sector. A survey conducted in 2021 revealed that nearly 73% of Australian early childhood educators expressed their intention to leave their jobs within three years. The reasons cited for this included low pay, overwork, and feeling undervalued. Moreover, early childhood educators face a high risk of burnout, which not only contributes to the high turnover but also potentially leads to poor educational outcomes for young children.<sup>17</sup>

DCA notes that there are also concerns that the imminent lifting of the subsidy rate for ECEC<sup>2</sup> will increase demand for ECEC, and that this increased demand will not be adequately met due to the existing staff shortages.<sup>18</sup> This demonstrates the urgent need to address staff shortages through better pay and working conditions for ECEC workers.

**RECOMMENDATION 8:** The Commission should investigate how to reduce staff turnover for childcare workers.

## Opportunities

DCA supports the government’s view that “ECEC is an essential part of Australia’s education system and is integral to Australia’s economic prosperity as a powerful lever for increasing workforce participation.” We believe that there are a number of opportunities that the review should address.

### Investing in ECEC is good for women and the economy

Investing in ECEC holds significant benefits for both women and the economy. Firstly, it enables women’s workforce participation, and helps women who want to work or increase their working hours but are unable to because of insufficient access to childcare.<sup>19</sup> By facilitating greater female workforce participation, ECEC plays a vital role in reducing the gender pay gap. As DCA’s research shows, care, family and workforce participation account for a third of the gender pay gap.<sup>20</sup>

Australian women rank highest in the world for education attainment, yet we are lagging behind when it comes to women’s workforce participation. It is estimated that if female workforce participation were equal to that of males, this could GDP by 8.7 percent or \$353 billion by 2050.<sup>21</sup> With these economic benefits, making childcare more affordable is a “no brainer” for unlocking female talent,<sup>22</sup> and to help alleviate the jobs crisis:

*“CEW president Sam Mostyn said reducing barriers to childcare was ‘the fastest way’ to increase workforce capacity so ‘the sooner we get on with it, the better’.*

*“We know that the most profound barrier to women returning to work is the affordability and accessibility of care for children,” she said.*<sup>23</sup>

### **This is an opportunity to reconsider Australia’s funding model**

Given the complexity and issues with the current funding system, we urge the Commission to think beyond simply increasing childcare subsidies.

This inquiry is an opportunity to reconsider Australia’s funding model, and investigate the feasibility of alternative models, including directly funding services, which some researchers have argued have significant benefits:

*“There is some evidence that direct funding of services can improve early childhood services. This is where governments fund providers directly for each child, as happens for preschools and schools. According to the OECD, direct public funding models can bring ‘more effective governmental steering of early childhood services, advantages of scale, better national quality, more effective training for educators and a higher degree of equity in access compared with parent subsidy models’.*<sup>24</sup>

**RECOMMENDATION 9:** The Commission should consider alternative funding models for ECEC, including directly funding services.

### **Encourage more men to take on more care**

The goal of improving access and affordability of ECEC is not simply to get all parents working full-time, it is about promoting equal and fair distribution of work and caring responsibilities, to enhance gender equality. To achieve gender equality, not only do we need to promote women’s workforce participation, but we also need to promote men’s participation in caring.

In order to fulfill the goal of closing the gap between women’s and men’s workforce participation, there is also a need to encourage more men to take parental leave. Research shows that men’s use of parental leave is related to greater involvement in childcare throughout the child’s life.<sup>25</sup> However, as our [She’s Price\(d\)less report outlines](#), men face significant barriers to using parental leave:

*“While parental leave is important for promoting gender equality by enabling women’s workforce participation, this low take-up by men also reinforces traditional gender roles concerning work and childcare.*

*“The rate that men take up parental leave in Australia is low compared to international standards. Men face cultural and policy barriers to taking up parental leave. The government funded scheme is ‘parental leave’ in name but its design means that it is mostly taken by women. Further, while more employers are offering gender neutral parental leave, a small number of employers still only offer leave to mothers. Research also shows that men who take parental leave face discrimination and negative attitudes. Many men also report that workplace culture can discourage them from taking leave. Social norms revolving around the ‘ideal worker’ or male breadwinner are also barriers to men taking more parental leave, and taking time away from paid work to care for a child may not be seen as ‘masculine’ in Australian culture.”*

Therefore, in order to promote gender equality in workforce participation, there is a need to promote shared care and remove systemic and cultural barriers to men taking parental leave.



In addition to barriers to using parental leave, our research has found that male caregivers face “significant disadvantage at work.”<sup>26</sup> In particular, DCA’s [Inclusion@Work Index: Mapping the State of Flex in the Australian Workforce](#) shows that:

*“...male carers accessing flex report the highest levels of exclusion compared to other flex workers. At 48%, almost one in two male carers accessing flex witnessed and/or experienced discrimination and/or harassment in the last 12 months, compared to 28% of male workers accessing flex without caring responsibilities.*

This demonstrates the need to combat the stigma surrounding men who access flexible work options, particularly those with caregiving responsibilities.

**RECOMMENDATION 10:** The Commission should investigate how to break down barriers and address stigma, in order to encourage more men to take on more childcare.



# CONCLUSION AND RECOMMENDATIONS

It is evident that addressing the issues of accessibility and affordability in childcare is crucial for improving workplace gender equality. The Mitchell Institute's report highlights the disparities in accessing high-quality childcare services in regions with lower socioeconomic status. Efforts should be directed towards ensuring that families with the greatest need can access quality ECEC services. This includes focusing on areas with limited access, also known as "childcare deserts," and investigating the potential impact of improving accessibility on female workforce participation rates.

Furthermore, the low wages and staff shortages in the childcare sector pose significant challenges. It is essential to properly value and fairly compensate childcare workers to reduce turnover rates, improve working conditions, and provide better educational outcomes for children. The complex funding model in Australia needs to be reconsidered, exploring alternative models such as direct funding of services. Additionally, promoting equal and fair distribution of caring responsibilities is crucial, including encouraging men to take on more childcare and addressing the barriers they face to do so. Investing in ECEC has significant benefits for unlocking female talent, reducing the gender pay gap, and enhancing economic prosperity. Therefore, DCA recommends:

**RECOMMENDATION 1:** As ECEC was found to be more accessible in neighbourhoods where there are higher fees, the Commission should consider role of the current funding model in perpetuating inequality in access to ECEC.

**RECOMMENDATION 2:** The Commission should focus on finding solutions to addressing lack of access to high-quality ECEC in "childcare deserts".

**RECOMMENDATION 3:** The Commission should investigate whether improving the accessibility of high-quality ECEC in areas with lower female workforce participation rates could help lift those participation rates.

**RECOMMENDATION 4:** The Commission should investigate how improvements to ECEC can help enable women's workforce participation and help close the gender pay gap.

**RECOMMENDATION 5:** The Commission should investigate how to ensure that childcare work is properly valued.

**RECOMMENDATION 6:** The Commission should investigate how to achieve better and fairer pay and better conditions for childcare workers.

**RECOMMENDATION 7:** The Commission should investigate whether Australia's disparate funding model contributes to low wages in the sector, and whether streamlining funding responsibility could help to support fairer wages.

**RECOMMENDATION 8:** The Commission should investigate how to reduce staff turnover for childcare workers.

**RECOMMENDATION 9:** The Commission should consider alternative funding models for ECEC, including directly funding services.

**RECOMMENDATION 10:** The Commission should investigate how to break down barriers and address stigma, in order to encourage more men to take on more childcare.

# ENDNOTES

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