Thank you for the opportunity to comment on the Productivity Commission’s November 2023 draft report, *A path to universal early childhood education and care.*

As a mother and grandmother and having spent 35 years as a clinical psychologist (now retired) working primarily with women but also with children, I welcome the Commission’s draft recommendations to address the barriers affecting access to early childhood education and care (ECEC) services for children aged 0-5 and to support better outcomes for children and families by focusing on ECEC availability, affordability, inclusivity, flexibility and regulation.

While the Commission’s work and recommendations are most welcome, I wish to share my concerns that the Commission’s primary focus on childcare creches may have missed the opportunity to make recommendations that would provide more realistic options related to flexibility and support for families and children:

1. The report contains a persisting acceptance that if a stranger cares for a child it is work deemed worthy of payment, but if a parent (or grandparent) cares for their own child it is not worthy of payment. Children’s temperament and both normal and special developmental needs, and/or parental values and needs may see parents want to care for their own children (and not want to use ECEC creche services) especially before children reach the age of three.
2. The report lacks consideration of nannies to provide in-home care. This may be particularly important when a mother is suffering post natal physical or mental health complications, or when parents have paid employment that occupies them outside the usual hours of creches - the list of such jobs is endless but includes vital medical and other care jobs in particular and a vast array of ‘casual’ jobs. Nannies may also be crucial when a child has unique health issues so that creche threatens their life rather than enhances it.
3. The idea that creches could be open for longer hours to cater for some of these situations may be quite impracticable both from the point of view of the service provider, but also in terms of the reality of such care for a child where night-time sleep rituals and patterns may be seriously disturbed.
4. The many times that children cannot attend creche because of illness sees parents not only take leave from their paid work to care for their children, but still having to pay creche fees for those days. Nannies may be helpful carers in such instances, but both availability, cost and the lack of such emergency services currently means this option does not exist.
5. Anecdotally (and I expect research that I am not across corroborates this) parents (mothers in particular) re-enter the work force but see the costs of childcare nullify their own salary.
6. Real flexibility and genuine support for families and children requires a reassessment of the current approach of government payment going to ECEC providers rather than to parents. The suggestions above for flexible support and childcare require consideration of including alternative payment options for a range of families and a range of ECEC care. This might included the current payment scheme but also alternatives such as payments direct to parents or parents receiving tax deductibility for ECEC costs.

I hope this feedback can help with the Commission addressing availability and affordability gaps, as well as ensuring that the ‘universal ECEC’ system is inclusive, flexible and well-coordinated.

Yours sincerely,

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