



PRE-BUDGET SUBMISSION 2025-26

Department of Treasury, Commonwealth Government

Family Day Care Australia
January 2025



1. INTRODUCTION

Family Day Care Australia (FDCA) welcomes the opportunity to provide a submission to the Treasury, in advance of the 2025-26 Federal Budget.

The purpose of this briefing paper is to examine the decline of the family day care sector and to explore what specific programs, policies, funding and/or support structures may be implemented by that will assist in immediately arresting the decline in the number of family day care educators, shift the support structures available to create an environment that systemically addresses family day care specific viability issues and foster favourable conditions for sector growth.

1.1 RECOMMENDED INVESTMENT MEASURES

This submission reflects the views of the family day care sector and outlines the case for a number of key funding priorities that are not only pivotal in ensuring the long-term viability of the family day care sector through incentivising and supporting growth.

These recommended investment measures are:

- Ongoing funding for a remuneration boost program for family day care staff and educators, equivalent to the "Worker Retention Payment" wage increase program developed for Centre Based Day Care (CBDC) and Outside School Hours Care (OSHC) services.
- Funding for a dedicated entity for family day care to support the development and execution of a sector-led strategic plan supported by a resourced FDC reform team.
- Investment in reducing administrative burden through technological solutions.
- Addressing under-served/unserved markets through supply side funding for family day care.
- Raising the hourly CCS cap rate for family day care (to be at a minimum) in line with the calculation afforded to centre-based care services so that it more accurately reflects the cost of providing family day care.
- Application of an additional loading of 20% to the recalculated CCS fee cap for nonstandard hours family day care to adequately reflect the cost of this type of care.

- Funding support for building sector capacity through innovation in the family day care model.
- Funding the development of a bespoke family day care traineeship program.
- Supporting and partially funding a National Recruitment Program for family day care.
- Support for dedicated measures to encourage workforce participation for priority CALD groups.
- Funding start-up support for new family day care educators.
- Funding new educator engagement support for family day care Approved Services.

FDCA contends that if the above proposed investment measures are not introduced in the 2025-26 Federal

Budget, the family day care sector is at risk of market failure to the significant detriment of the Australian children, families and communities that rely on family day care. As detailed in Section 2, the family day care sector has been under sustained and significant viability pressures. Intervention is required to arrest this downward trend and support the sector towards a growth trajectory.

1.2 ABOUT FAMILY DAY CARE AUSTRALIA

FDCA is an apolitical, not for profit, national member association representing over 9,000 family day care educators and 355 approved family day care services. Our mission is to represent, support and promote the family day care sector in delivering high quality ECEC to more Australian children.

FDCA supports the National Quality Framework governing the ECEC sector and, as the national peak body for the family day care sector, shares many objectives in common with Australian governments and regulatory agencies including:

- promotion of continuous improvement in the provision of quality education and care services;
- reduction of the regulatory and administrative burden for education and care services, whilst simultaneously improving the efficiency and cost effectiveness of the regulation of ECEC; and
- measures to build a highly skilled workforce.

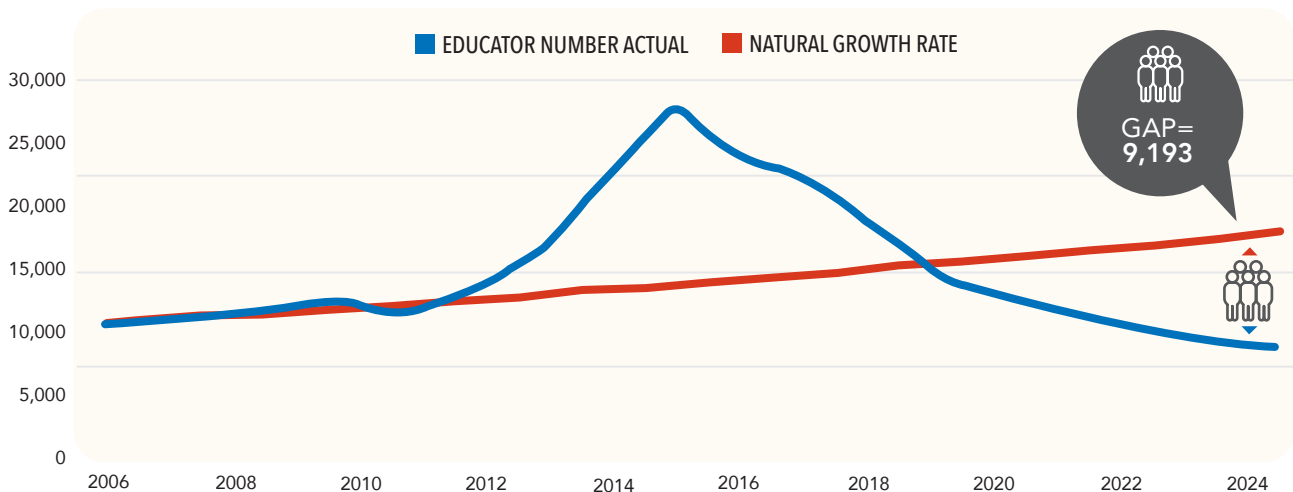
2. STATE OF THE SECTOR

2.1 A SECTOR IN DECLINE

As identified in the Productivity Commission ECEC Inquiry Final Report and the ACCC Childcare Inquiry final report, the family day care sector is experiencing a sustained period of decline. FDCA's internal member data and the Department of Education's quarterly child care usage reports show that over the past 6 years, since the commencement of the Child Care Package

there has been a 26.9% decrease in the number of approved services and a 41.3% decrease in the number of educators. What is exceptionally alarming is that the actual numbers of educators in the family day care sector is, as of mid-2018, dipping below what should have been the "natural" projected growth line of educator numbers in the sector, according to internal modelling undertaken by FDCA, depicted in Figure 1. The drop in educator numbers below the natural growth line can be seen where the two separate lines intersect in 2018.

FIGURE 1 Number of Family Day Care educators: actual numbers and natural growth line, 2003-2024



Logically, these numbers clearly correlate with a comparable decline in the number of children and families able to access family day care. In September 2018, there were 131,600 children and 89,160 families utilising family day care. In September 2024, there were 71,340 children and 51,150 families using family day care. This represents a decline of an astounding 45.8% children and 42.6% of families accessing family day care.¹

¹ Department of Education, Child Care in Australia report, September Quarter 2024.

While FDCA acknowledges the impact of fraudulent and unscrupulous operators between 2013 and 2018 (and beyond, to a lesser extent), and has been an advocate for proportionate reform, the long-term viability of legitimate family day care services is now being jeopardised by the sustained decrease in the sector. While there are many likely reasons for this decrease, including the cumulative effect of an increased regulatory and compliance burden on sustainable growth and financial viability, if left unaddressed, it will almost certainly lead to a reduction in the availability of flexible and affordable ECEC for Australian families.

Despite a common misconception, this decline is no longer a function of governments justifiably cancelling the approvals of unscrupulous operators but is in fact the demise of many of our sector's oldest and most respected services. Equally, the decline is not a product of waning demand, in fact, demand for family day care services has never been higher. Data from a survey of FDCA approved service members indicates that over 3,000 new educators are needed immediately just to meet current confirmed child waiting lists in family day care. Table 1 below provides a small sample snapshot as evidence of the dire state of our sector, in terms of educator numbers declining and closures of well-established approved services.

TABLE 1: Sample of established Family Day Care Service closures and declining educator numbers, 2024

SERVICE NAME	SERVICE PROFILE	CRISIS STATUS
Mornington Peninsula Family Day Care	Long-standing council service in Mornington Peninsula and Frankston, Victoria, operating for over 25 years prior to closure. 145 families and 183 children affected.	Closed June 2021
City of Casey Family Day Care	Long-standing council service in Narre Warren Victoria operating for over 25 years prior to closure. In 2019 City of Casey Family Day Care had more than 200 educators and over 2,000 children using the service.	Closed November 2021
Churches of Christ Family Day Care	Churches of Christ Care was the first family day care scheme in the Wide Bay Region, establishing in January 1979. 878 children affected in Cunnamulla, Gin Gin, Hervey Bay, Maryborough and Brisbane.	Closed June 2022
Mission Australia Family Day Care	3 services, 2 in Western Sydney and one in Tasmania. Across the 3 services, in July 2019 Mission Australia Family Day Care had 207 educators operating.	Closed July 2022
Bright Futures Family Day Care	Community based not-for-profit established in 1988 operating in the Kwinana area, WA.	Closed March 2023
Uniting Education Family Day Care	Not-for-profit church-based service established in the mid-1980s in the Brisbane area.	Number of educators: July 2019: 67 June 2024: 14 % decline: -79.1%
Kath Dickson Family Day Care	One of the first family day care services in Australia - a not-for-profit, community-based service established in 1975 operating in Toowoomba, South-West Queensland and the Sunshine Coast.	Number of educators: July 2019: 83 June 2024: 27 % decline: -67.5%
Coastwide Family Day Care	Community based not-for-profit established in 1983 operating in the Central Coast region.	Number of educators: July 2019: 173 June 2024: 95 % decline: -45.1%
Northern Rivers Family Day Care	A community based not-for-profit service that has been operating since 1980 in the Lismore to Tweed Heads area.	Number of educators: July 2019: 153 June 2024: 94 % decline: -30.1%

2.2 OCCUPATIONAL BURDEN AND REMUNERATION

In 2023, FDCA commissioned an independent research firm (“Survey Matters”) to undertake research to explore the socio-demographic profiles of educators that have exited the sector over the past 3 years, investigate contributing factors to the decision to leave the sector (including identifying any specific trigger points), and identify the primary and secondary rationales for educators exiting the sector.

While the reasons for leaving the sector were often interrelated, the time-intensive impact of regulatory compliance requirements and associated onerous administrative burden, in combination with financial viability pressures, emerged as significant factors contributing to educators’ decision to leave:

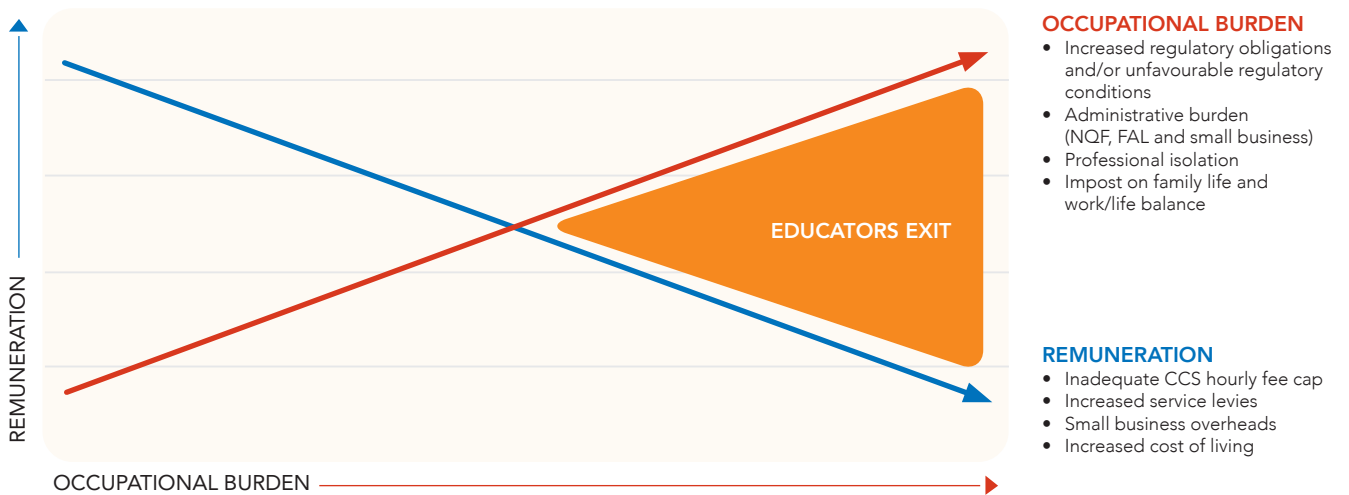
- Almost 3 in 4 former educators (73%) cited the impact of regulatory and administration burden as

demanding, with 42% citing these requirements were extremely demanding.

- In addition, 44% of former educators said that National Quality Framework (NQF) paperwork requirements was the key contributing factor to their decision to leave family day care.
- Half (50%) of respondents reported that the income they earned did not accurately reflect the responsibilities they held and the work they did.

In simple terms, it appears that the primary factors driving educators to exit the sector are a combination of “occupational burden” factors and considerations around inadequate remuneration, the intersection of which results in a “tipping point”, whereby once both factors reach a certain threshold (i.e. occupational burden has increased and remuneration decreased), educators are exiting family day care.

FIGURE 2 Occupational burden vs remuneration



The report’s findings underscore the urgent need for systemic changes to address the issues faced by family day care educators and the need for recognition of the unique challenges of family day care, both of which are critical steps towards retaining educators in this vital sector.

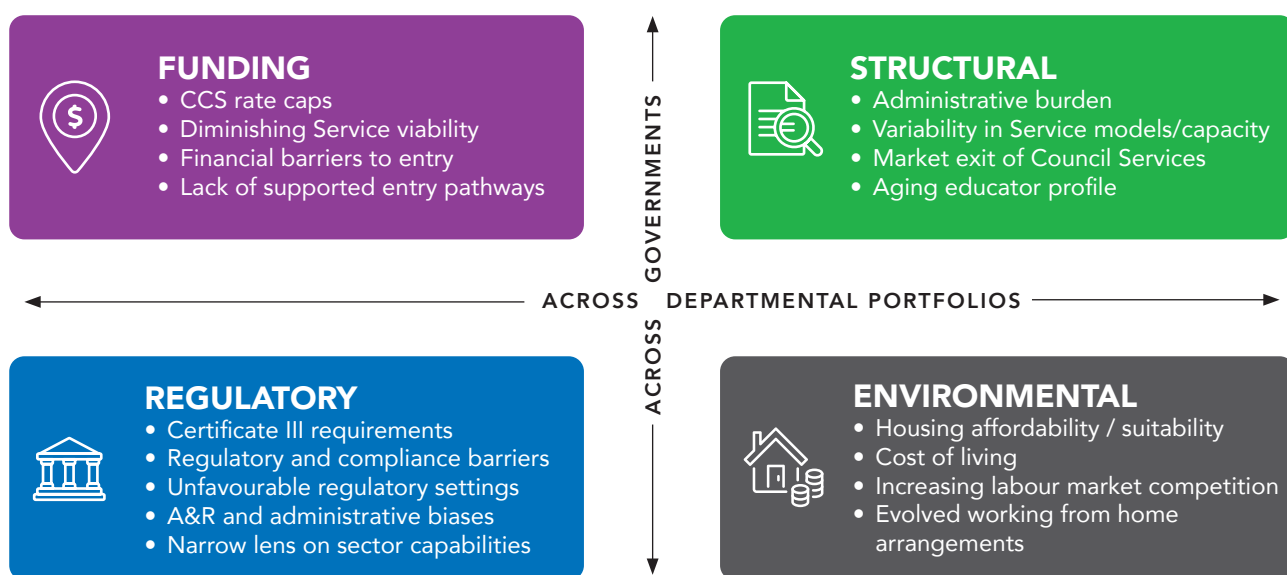
Beyond educators' specific personal reasons to exit the sector, based on reaching the "tipping point" of the intersecting occupational burden and remuneration factors, the decline in educator numbers is clearly also the result of a complex range of both macro and micro factors, including (but not limited to):

- the decline in housing affordability, the changing nature of the work landscape (for example, new working-from-home options);
- the relative competitiveness of remuneration due to a number of structural factors (for example, the inadequate CCS hourly fee cap)
- inadequate contextualisation of regulations to the family day care context;
- an inequitable workforce landscape (for example, family day care educators are unable to place

their own children in family day care on days they are working as a family day care educator, while centre-based workers are eligible for a government subsidised fee discount for their children);

- underutilisation of the flexible capabilities of the family day care model (for example underutilisation of venue care options);
- barriers to entry relating to qualifications (for example, the recent change in qualification requirements removing the ability to be working towards Certificate III, the lack of nationally consistent Certificate III funding model and the lack of a dedicated traineeship model for family day care); and
- A narrow lens of, and/or, aversion to innovation around the potential capabilities of the sector due to historic compliance challenges.

FIGURE 3 Multifactorial drivers impacting Family Day Care



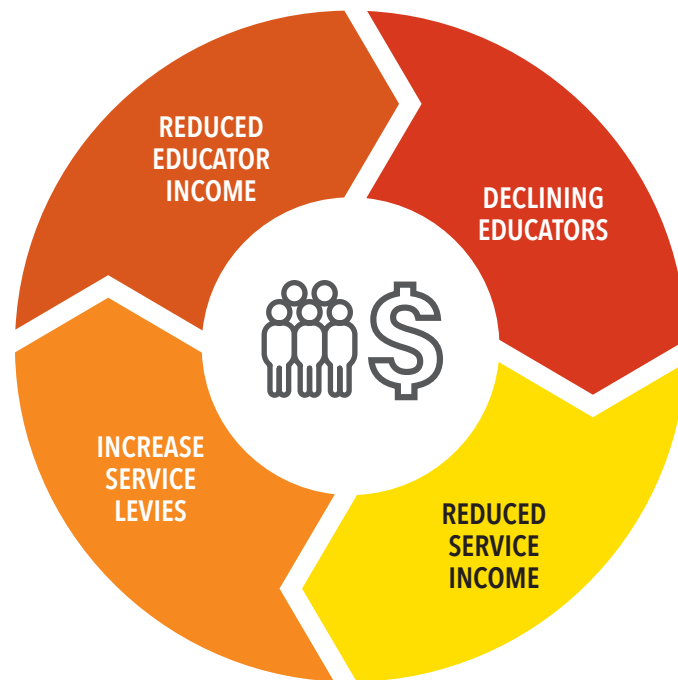
Despite a shifting policy lens and associated actions towards a more favourable view of the capacity and strengths of the family day care model, what is evident is that no single change or isolated response will fix the issues of declining educator numbers and reduced approved service viability. The issues at play (and thus, associated potential solutions) sit across levels of government, across Departmental portfolios within governments, and fall across a broad range of categories, encompassing regulatory constraints, funding deficiencies, alongside broader structural and environmental factors. As such, a 'siloed' approach to reform has limited potential for broadscale success, and more so, a coordinated strategic reform agenda is required.

2.3 DIMINISHING VIABILITY CYCLE

The culmination of the above factors, that are resulting in a decline of educator numbers nationally, are intrinsically linked to a decline in approved service viability due to a cyclical process associated with the fundamental funding model on which family day care relies, which links approved service financial viability to the number of educators registered (and by extension the number of children enrolled), as a service's income is generally derived from a per child, per hour administrative levy. In summary, the diminishing viability cycle is as follows (see Figure 4 below for a graphic representation):

- As educators exit the sector (due largely to the aforementioned occupational burden and remuneration factors), the approved service derives increasingly less income from administrative levies.
- This results in increased levies to maintain viability (unless new educators can be recruited, which is increasingly difficult in the current workforce climate).
- This, in turn, reduces the remaining educators' income, compounding the remuneration pressure felt by educators, which increases the likelihood of the remaining educators exiting.

FIGURE 4 Diminishing viability cycle



2.4 THE CCS HOURLY RATE CAP

One particular funding-oriented factor that should be emphasised within the broader discussion relates to the lower CCS rate cap applied to family day care. The inappropriate hourly CCS fee cap that applies to family day care has been a key advocacy priority for FDCA since inception in 2018 and our long-standing position is that the assumptions underpinning the calculations leading to the current CCS fee cap rates were never or are no longer accurate/applicable. In essence, the lower fee cap for family day care is an inequitable market intervention that puts family day care at a competitive disadvantage and affects educators' ability to be appropriately remunerated, which has flow on effects to educator attraction, retention and hence approved service viability. Additionally, at each indexation of the cap, the gap between family day care and centre-based care widens.

FDCA has repeatedly challenged and refuted the 'lower overheads' assumption underpinning the calculation of the inadequate CCS cap rate for family day care. Consultation with and evidence from FDCA members show that, while family day care can be more agile and efficient in meeting and responding to variable demand especially in under-served, the 'dual-layered' overheads for both family day care services and family day care educators are fundamentally comparable² to those in centre-based care.

The evidence is indisputable that the CCS hourly rate cap for family day care is inaccurately calculated, inequitable and is hindering a significant number of family day care educators to be adequately remunerated for the important work they do every day. This position has been confirmed by the ACCC Childcare Inquiry's Final Report, which states:

- One in three (34% in the September 2023 quarter) family day care services continue to charge fees above the hourly rate cap, despite the largest indexation of the cap in July 2023 (p.32).
- Immediately prior to the indexation of the hourly rate cap, in the June quarter 2023, about 52% of family day care services were charging above the hourly rate cap. This reflects how closely family day care services are priced to the hourly rate cap, and we expect that over the course of the period up to July 2024, a greater number of services are likely to exceed the cap (p.78).
- Fees charged above the cap increase the out-of-pocket expense for households (p.44).
- The relatively high share of family day care services exceeding the hourly rate cap likely reflects the lower

hourly rate than for other services, a large number of non-standard hours of care in the sector, and ultimately, a need to charge higher fees to remain viable and profitable in the sector (p.32).

This evidence culminates in the following findings and recommendations by the ACCC:

- "There is little financial incentive for family day care and in home care educators to enter or remain in the sector, as effective wages are below comparable award rates for other forms of childcare" (Finding 22).
- "...the family day care hourly rate cap is also unlikely to be sufficient to adequately cover costs and recompense educators" (Finding 23).
- "The ACCC recommends further consideration and consultation on changes to the Child Care Subsidy and hourly rate cap, to simplify their operation and address unintended consequences, including on incentives and outcomes. In doing so, we recommend consideration be given to:
 - Determining an appropriate base for the hourly rate cap and indexing the cap to more closely reflect the input costs relevant to delivery of childcare services. This could include consideration of labour costs. As part of this, the family day care and in home care hourly rate caps should be reviewed and consideration given to increasing them. This should ensure providers can adequately cover costs, including appropriate labour costs" (Recommendation 2a).

Furthermore, in the recent Productivity Commission Inquiry Final Report, it is noted that 24% of centre-based day care services (predominantly in more advantaged communities), and 40% of family day care services, charge fees that are above the cap (p.17), including in lower socio-economic status areas and that the FDC hourly rate cap should be reviewed (Finding 6.1).

Accordingly, under Recommendation 6.3, the Productivity Commission proposes: "Change the approach taken to indexing the hourly rate cap and review levels of the hourly rate cap for some types of service". This recommendation specifically proposes that the Australian Government should review the hourly rate cap for family day care to determine the levels they should be set at to better reflect operating costs and support affordability, while maintaining integrity.

2 This was confirmed in the Interim Report for the NSW IPART Review of Early Childhood Education and Care (October, 2023). See p.179: "The costs we calculated for family day care are comparable to long day care, which is the position outlined by the Family Day Care Australia in a submission to the Productivity Commission."

3. WHY FAMILY DAY CARE IS IMPORTANT

Family day care is a unique and essential part of the ECEC landscape in Australia. Parents and guardians with children in family day care often choose this form of care because of the type of service offered. That is, they highly value the home-based, small group environment provided by family day care.³ Furthermore, as highlighted above, the family day care sector provides much needed ECEC for families living in less advantaged areas and is preferred by families who come from a culturally and linguistically diverse (CALD) background.⁴

Over 40 years ago the family day care sector pioneered the 'sharing economy', leveraging the capacity and capabilities of communities to deliver a unique and innovative approach to supporting the diverse ECEC needs of Australian children and families. What evolved was a thriving network of early childhood education professionals, mostly women in small business, that became the global benchmark in home-based ECEC approaches.

However, sadly, through more than half a decade of neglect, 'blunt instrument', compliance-focused regulatory reform between 2014 and 2021 (approx.), and inequitable market intervention from governments, our sector is facing immense viability strain and the resulting outcome for children and families will be devastating. Without prompt intervention the family day care sector faces collapse, and in turn, the families and children for whom family day care is, for so many reasons their option of choice, or in many cases, their only choice, will be left stranded.

3.1 A SECTOR THAT SUPPORTS REGIONAL AND DISADVANTAGED AREAS

The Productivity Commission found the following: *"ECEC availability tends to be poorer in regional and remote areas and in communities experiencing higher levels of socio-economic disadvantage. It is unclear whether this reflects a lack of local demand for ECEC, viability concerns that cause providers to decide against*

*establishing services or both. Only 8% of children aged 0–5 live in communities with sufficient centre-based day care places to support access to 30 hours or three days of ECEC a week."*⁵

Given there doesn't appear to be any available evidence of a widespread lack of demand for approved ECEC in regional and/or disadvantaged areas across Australia, this should indicate that the assertion that "viability concerns that cause [centre-based] providers to decide against establishing services" [in regional and remote areas and in communities experiencing higher levels of socio-economic disadvantage], is at least moderately, though possibly highly, accurate.

However, if family day care were actively supported to grow with appropriately tailored funding and support mechanisms, the goal of up to 30 hours or three days a week of quality ECEC being available for all children aged 0–5 years whose families wish for them to participate, particularly in unserved or under-served areas, would be considerably more attainable given:

- The family day care sector provides care for a significant proportion of households in areas of less advantage, with approximately 72% of children who attend family day care services in 2023 located in areas that are ranked in the 5 deciles of least advantage.⁶
- Family day care services are slightly more concentrated in areas of less advantage, with around 19% of services located in the most disadvantaged area, compared with around 4% in the most advantaged area, in the September 2023 quarter.⁷
- 23.5% of educators providing family day care in areas that are ranked in the two highest deciles on the SEIFA index.⁸
- 26.1% of family day educators operate in regional and remote areas of Australia.⁹
- Family day care is more common in regional and remote areas, as a share of total number of the type of service, than centre-based day care and outside school hours care.¹⁰

3 Australian Consumer and Competition Commission, (June 2023): Childcare Inquiry, Interim Report.

4 Department of Education, Skills and Employment (August 2022), 2021 ECEC National Workforce Census, prepared by the Social Research Centre.

5 Productivity Commission (November 2023), A path to universal early childhood education and care, Draft Report, Canberra, p.62.

6 Australian Competition and Consumer Commission (ACCC), December 2023: Childcare Inquiry, Final Report: p.185.

7 Ibid. p.98

8 FDCA internal member data.

9 Ibid.

10 Australian Competition and Consumer Commission (ACCC), December 2023: Childcare Inquiry, Final Report: p.31.

- 30.1% of children attending family day care are from regional and remote areas, compared to 22.6% of those attending centre-based care and 17.9% of those attending outside school hours care.¹¹
- Households with an income of less than \$73,000 are proportionally more likely to use family day care than those with higher household incomes.¹²

As such, and as asserted both in the ACCC Childcare Inquiry Final Report and the Productivity Commission ECEC Inquiry Final Report, family day care can be an effective solution to addressing thin, under-served and/or unserved markets.

3.2 MEETING THE NEEDS OF CALD CHILDREN AND FAMILIES

As referenced in the ACCC Childcare Inquiry Final Report, family day care is important for many culturally and linguistically diverse households, providing an alternative choice to centre based day care that may be more flexible or better able to cater to particular cultural and linguistic needs (p.173); however, the availability of these services is reducing (p.131), which is highly problematic.

The ACCC Childcare Inquiry Final Report also states that one of the benefits of family day care is that a family day care educator may have the same cultural background as the children in care and may be able to reproduce cultural values and speak the same language as the household. Additionally, the Australian Education Research Organisation (AERO) found that *“family day care may be an important complement to preschool for emerging multilingual children. When we analysed children’s pathways from one ECEC setting to another, we found that emerging multilingual children had better outcomes when they participated in family day care in the early years (between 2013 and 2016), followed by standalone preschool in the year before school (2017) ... family day care followed by standalone preschool was associated with an increase in Language and Cognitive Skills (school-based) scores between 1.2 to 2 times larger than for those children using long day care followed by standalone preschool.”*¹³

Recent evidence also shows that family day care is playing a significant role in supporting children from CALD backgrounds and their families. Indeed, the latest *ECEC National Workforce Census (2021)* revealed that around half (n= 4,590) of the total number of children attending child care services (n=9,248) during the reference week from (or had parents/guardians from) a refugee or special humanitarian program background, attended family day care services. This compared to only 3,343 in centre-based services, a sector *over 10 times* the size of family day care.¹⁴

3.3 ECEC SERVICES DO NOT CONSISTENTLY RESPOND TO FAMILY NEEDS

Data from the *AIFS Child Care Package Evaluation: Early monitoring report*¹⁵ indicates that the family day care sector offers significantly higher levels of flexible sessions than centre-based day care. For example:

- 84.7% of family day care services offer shorter sessions (up to 6 hours) compared to only 17.2% of long day care services.
- 94% of family day care services also offer longer sessions (7-12 hours).
- 65.3 % allow for the swapping of days/sessions or sessions to be added or changed at short notice, compared to 51% and 50.2% of long day care services respectively.

This flexibility is critical to catering for the current and future needs of Australian families, especially in the face of changing work patterns, where casual, contract and part-time work is common, and women form 68.1% of the part-time workforce.¹⁶

Family day care also offers considerably higher levels of non-standard hours care, compared to the long day care sector:

- 88.2% of family day care services offer sessions of care on weekdays before 7am or after 6pm, compared with 45.7% of long day care services.
- 85.5% of family day care services offer care on

11 Department of Education, Child Care in Australia report, September Quarter 2023.

12 Ibid. p.79.

13 Lampe, B., Healey, B., Collier, L., & Jackson, J. (2023) Promoting equity for multilingual children in early childhood. Australian Education Research Organisation. From <https://www.edresearch.edu.au/resources/promoting-equity-multilingual-childrenearlychildhood-research-report>

14 Department of Education, Skills and Employment (August 2022), 2021 ECEC National Workforce Census, prepared by the Social Research Centre.

15 Baxter, J., Budinski, M., Carroll, M., Hand, K., Rogers, C., Smart, J., Bray, J.R., Gray, M., Blaxland, M., Katz, I., & Skattebol J. (2019) Child Care Package Evaluation: Early monitoring report. (Research Report). Melbourne: Australian Institute of Family Studies.

16 Source: www.wgea.gov.au/data/fact-sheets/gender-workplace-statistics-at-a-glance.

weekends, compared with a mere 0.5% of long day care services.

- 47.5% of family day care services offer overnight care, as compared with 0% of long day care services.¹⁷

Evidently, family day care is the primary regulated and approved ECEC option of care during non-standard hours, including evenings, weekends and overnight. Australian Government ECEC session data for the September quarter 2023 indicates family day care used the highest percentage of subsidised hours as a share of total hours charged by service type. "This may be due to the greater flexibility in session hours offered by family day care educators, allowing households to structure their usage in the most beneficial manner."¹⁸

The ACCC Childcare Inquiry Final Report also notes that *"any family day care educators advised during outreach discussions that they will offer flexible hours to their clients to meet their needs. For example, offering an earlier start time if needed by a household on a particular day, or by not enforcing a late fee as long as a parent or guardian keeps the educator informed of their expected pick-up time... (p.184) ... in this sense, family day care provides a small scale, highly flexible childcare option for parents and guardians needing care for their child or children"* (p.180).

This type of care is also increasingly important for Australian working families and their communities. FDCA members who offer non-standard hours care tell us their service is highly valued in their communities and meets the needs of a range of families, in particular shift workers from a range of industries, for example aged care staff, disability support workers, nurses, paramedics, police officers, FIFO workers, cleaning contractors, factory workers, and farmers.

3.4 EFFICIENCY OF AND RETURN ON INVESTMENT

In 2021, FDCA contracted Deloitte to review FDCA's Workforce Output Model (see Appendix A), which showed that additional investment by Government into the sector through FDCA's "Educator Start-up Grant"

and "Approved Service Engagement Payment" (i.e. two-tiered recruitment support programs) are mechanisms that makes sound economic sense, as they generate a significant return on investment per educator and result in expanding family day care service provision in areas of limited supply.

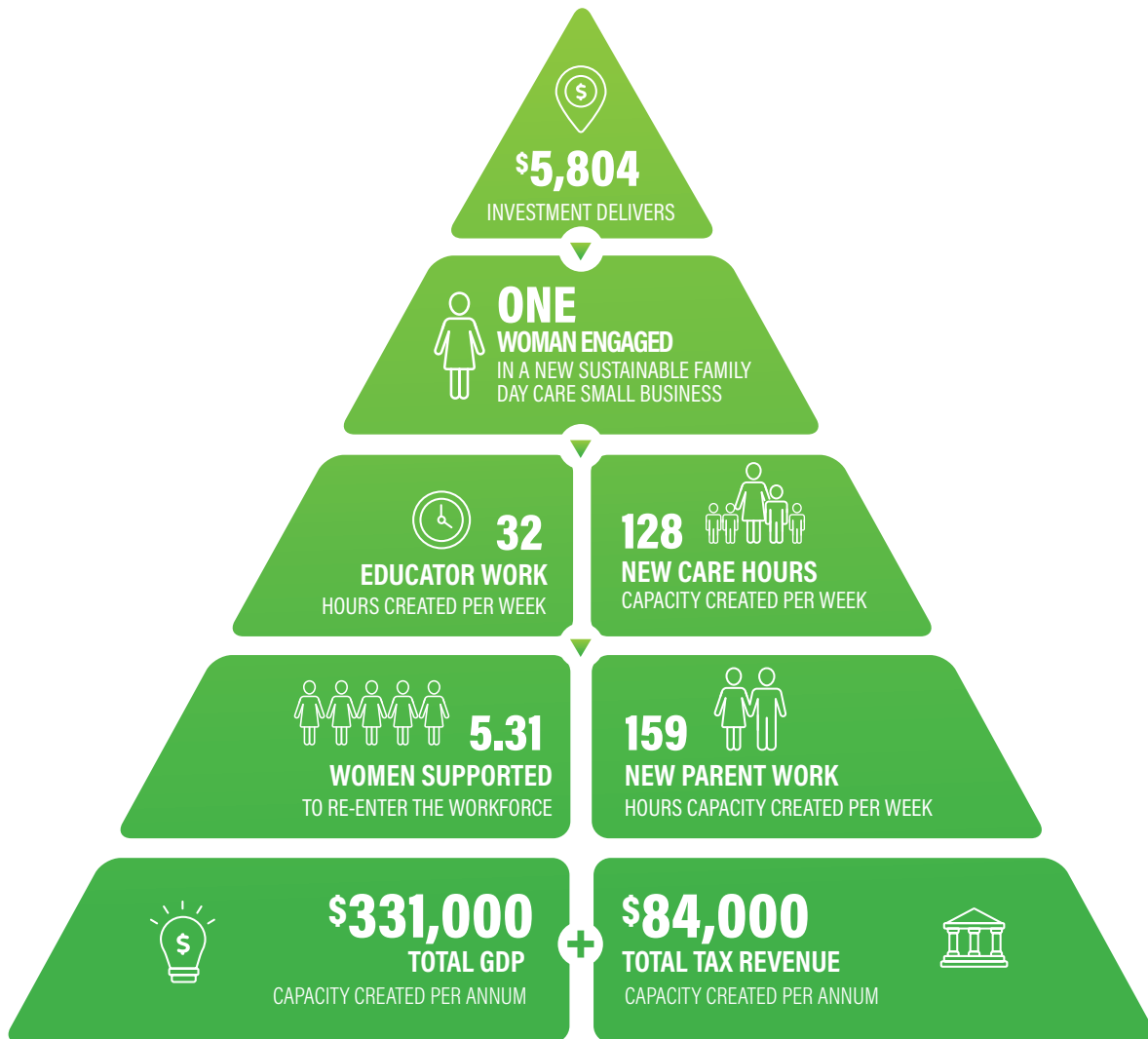
The Workforce Output Model: ROI Snapshot (Figure 5 below) provides a graphic summary of the return on investment of such recruitment support payments and shows that a funding injection of \$5,804 that supports one woman to become an educator can:

- Create up to 128 new care hours per week.
- Support 5.31 women into work.
- Create 191 new work hours (including the educators own work).
- Generate approximately \$331,000 annual contribution to GDP.

17 Baxter, J., Budinski, M., Carroll, M., Hand, K., Rogers, C., Smart, J., Bray, J.R., Gray, M., Blaxland, M., Katz, I., & Skattebol J. (2019) Child Care Package Evaluation: Early monitoring report. (Research Report). Melbourne: Australian Institute of Family Studies.

18 Australian Competition and Consumer Commission (ACCC), December 2023: Childcare Inquiry, Final Report: p.180.

FIGURE 5 Workforce Output Model: Return on Investment Snapshot



Furthermore, while FDCA acknowledges the diverse and disparate need of children and families, and we are a strong advocate for choice, in the context of better supporting families and communities in areas of limited ECEC supply, the efficacy and efficiency of investment in family day care is undeniable.

Simple modelling that explored hypothetical comparative investment proposals under the most recent round of the Community Child Care Fund (CCCF) demonstrated the following:

- For a centre-based service to be established (with the maximum allowable government investment under CCCF guidelines), the investment required **per child** (for 20 50-place services, to provide an additional 1,000 places) would be \$18,000.
- For the same desired outcomes (i.e. an additional 1,000 places in family day care), the required investment **per child** is \$857.

LDC Investment Modelling	
Est. children per centre	50
Target additional children in care	1,000
Centres required	20
Investment per centre*	\$900,000
Total establishment investment	\$18,000,000
Investment per child	\$18,000

FDC Investment Modelling	
Est. children per educator	7
Target additional children in care	1,000
Educators required	143
Investment /educator**	\$6,000
Total establishment investment	\$857,143
Investment per child	\$857

*Please note that this LDC modelling only accounts for the \$900k government contribution under the CCCF and not the additional mandatory co-contribution of the provider.

**Please note that this figure is based on the approximate amount required under FDCA's "Educator Start-up Grant" and "Approved Service Engagement Payment" funding structures presented in FDCA's Pre-Budget Submission 2024-25 and detailed in FDCA/Deloitte Workforce Outputs Model report (see Appendix A).

4. VISION FOR A STRONGER FUTURE STATE

4.1 KEY PERFORMANCE INDICATORS

In a stronger future state for family day care, the ECEC sector more broadly, and importantly, for children, families and communities, the following key performance indicators would be appropriate benchmarks of success:

- All families have ECEC choices that align with their needs and preferences.
- Discrete cohorts are well supported and thriving.
- There is strong government confidence in family day care through payment integrity.
- There is strong recognition of family day care sector capabilities, and active, supported pursuit of innovative approaches.
- There is a viable, quality, and growing family day care sector.
- There is reduced administrative burden and improved system capabilities for family day care.
- There are tailored funding models, programs and policy designed for family day care.

4.2 KEY REFORM RECOMMENDATIONS

There are a number of key reform priorities for the family day care sector, those being (but are not limited to):

- Arresting the decline in numbers of family day care educators and services through implementing strategies to support service viability, reducing administrative burden (at both an approved service and educator level) and supporting sustainable growth in educator numbers.
- Strengthening the financial viability of providing family day care to families by improving educator remuneration opportunities (for example through implementing higher CCS hourly rate caps) and delivering targeted supply-side funding initiatives for approved services.
- Exploring innovative models of family day care to expand capacity and delivery in areas of need, and for particular cohorts, in partnership with governments, industry, FDCA and approved services.

With innovative thinking and the right form of support, there are opportunities to better leverage the capacity and unique strengths of the family day care sector.

As noted in the Australian Children's Education and Care Quality Authority's (ACECOA) initial submission to the Productivity Commission Inquiry into ECEC: "As governments expand access to education and care, provision needs to remain flexible to ensure services are accessible and available for the hours required to support diverse family circumstances and workforce participation. Family day care services, for example, have flexible hours and are often the best option for children and families who are seeking a home environment, including shift and emergency workers and those based in regional and remote areas."

However, there are a range of diverse and intersecting structural, funding and workforce challenges that are acting as barriers to growth within the family day care sector, affecting attraction and retention and/or hindering the sector's capacity to meet the diverse needs of children, families and communities.

4.2.1 STRUCTURAL

A dedicated entity for family day care

The Productivity Commission acknowledges the systemic challenges facing the ECEC sector as a whole and, in its Final Report it proposes a stewardship model, "where the Australian, state and territory governments better coordinate their roles in the ECEC system and share accountability for outcomes" (p.50). Such a model is seen as necessary to be able to address some of the challenges facing the whole ECEC market and support a more cohesive policy response.

It recommends (Recommendation 10) that Australian and state and territory governments should therefore establish an independent ECEC Commission. It proposes the ECEC Commission's functions should include:

- monitoring and publicly reporting on the progress of governments – as system stewards – towards their commitments under the national agreement (Recommendation 10.1) and on outcomes produced by the ECEC system more broadly
- providing independent advice to the system stewards on how they can coordinate and design their policies to achieve effective outcomes for the system, by leveraging an ability to take a system-wide view
- acting as a custodian over research and data, and facilitating the better use and dissemination of ECEC data and research learnings.

Furthermore, the ACCC's September 2023 interim report recommended that a market stewardship role be considered by Australian governments. This would involve "closely overseeing, and taking responsibility for, overall

system functioning and coordination. This would require a clear vision and objectives, developing clear lines of responsibility, active collaboration between providers and government – including regular feedback on best practice and place-based approaches, and evaluation of outcomes” (p.233).

As part of this role, the report also noted that there could be value in mapping progress over time in meeting government objectives including the delivery of child care services across areas and cohorts: there a need for government intervention is identified, such as delivery of a service in an under-served area or cohort, additional demand-side subsidies or supply-side subsidies (whether through public or private provision) may be required (p. 233).

FDCA would support a market stewardship role across both Australian and state and territory governments in particular in identifying under-served areas and vulnerable cohorts, as long as it is inclusive of the family day care sector. More specifically, and more urgently, FDCA contends that the establishment of a dedicated entity that has powers to work across governments, including inter-departmentally, that has a specific care-type focus is necessary to work in a targeted and dedicated fashion to arrest the decline of family day care. The rationale for this is evident in the case presented above and the policy decision making oversights of previous governments that have not adequately supported family day care to thrive where needed.

Reduce administrative burden through technology

The Australian Government has already invested in foundational work to inform a reduction in FAL, NQF and business-related administrative burden through the funding of the Capability Trial, with two of the key workstreams being to:

- Improve family day care CCS payment integrity and FAL compliance through good practice business and systems analysis, the development of resources and support structures and exploration of potential CCSS and/or compliance administration system changes.
- Explore and trial specific digital solutions to close CCS compliance loopholes (including but not limited to a digital attendance verification tool).

FDCA commends the Australian Government for investing in this objective; however, we reiterate that this work is foundational, and beyond which it is vital that investment is made, either by government directly or in compelling third-party providers, to fundamentally develop or redesign technologies that simplify and systematise administration in the family day care context.

4.2.2 FUNDING

Remuneration boost for family day care staff and educators

In August 2024, the Australian Government announced a wage increase for the centre-based and outside school hours care ECEC workforce, which is being delivered through a new “worker retention payment”. The payment supports a wage increase of 10% on top of the current national award rate in the first year rising to 15% above the current national award rate in the second year, starting in December 2024 and running for 2 years.

This measure does not apply to family day care. However, through ongoing engagement with the Australian Government Department of Education and the Minister for Early Childhood Education, FDCA has ensured that any considerations given to wage increases for ECEC employees that fall under awards must also take into account the family day care context and the educator independent contractor model.

The Department of Education has acknowledged FDCA's positions and given a clear commitment to explore how a similar support mechanism can be extended to the family day care workforce. In order to guarantee its delivery, FDCA must include this position as funding may need to be allocated in the 2025-26 Budget.

Addressing under-served/unserved markets through supply side funding for family day care

While it is imperative that extremely careful consideration must be given to the design of any new supply-side funding mechanisms, FDCA would advocate for a model that couples the aforementioned “Educator Start-up Grants” and “Approved Service Engagement Payments” (i.e. “up-front”, discrete and targeted supply-side funding structures designed to incentivise family day care educators to enter the sector and support approved services to engage them) with an ongoing supply-side funding mechanism that is directly tied to actual sessions of care provided.

FDCA acknowledges that the Community Child Care Fund (CCCCF) currently fulfils a supply-side funding role that is designed to address barriers to ECEC participation for disadvantaged and regional/remote communities: however, it is time limited, and at the service or approved provider level, often fails to provide the requisite certainty of ongoing funding and thereby viability to achieve the necessary long term commitment of the provider to operate in these areas.

FDCA strongly believes that there is significant merit in exploring a supply-side, ongoing funding structure, enshrined in Family Assistance Law, that provides funding

to the approved service based on a per child, per hour basis for all registered educators, with tailored loading applied where those educators are operating in pre-determined SA2 regional/remote areas and areas of high disadvantage based on SEIFA decile.

Such a funding structure would both secure and improve service viability and confidence, while also incentivising and supporting approved services to recruit and retain educators across underserved/unserved markets.

While it may be necessary to retain a form of CCCF-type supply-side funding, for example, in cases where a service may dip below a certain educator number threshold, the per child, per hour type of funding would ensure that payments are actually tied to provision and usage, rather than lump sums based on projections with no guarantee of improved service viability and/or increased supply in areas of need.

As specified in Recommendation 8 of the ACCC Childcare Inquiry Final Report, "The ACCC supports further consideration of the benefits and challenges of supply-side subsidies (particularly as a longer-term consideration) coupled with other more direct forms of market intervention, as appropriate". It should be noted, however, that the ACCC, when considering family day care as a solution to addressing under-served markets in regional and rural areas, accurately stated "the ability of a family day care service to be able to oversee a rural or regionally located educator in a cost-effective manner also needs to be taken into account. High travel costs associated with coordinator visits to an educator (for example flights or petrol costs and accommodation) may challenge the viability of a family day care service."¹⁹

To this point, it should also be noted that under the Australian Government's previous "Community Support Programme" (CSP) the need for support in this area was acknowledged and delivered through the "regional Travel Assistance Grant" (RTAG) which was "a support payment designed to assist FDC services and IHC services with the travel costs incurred by coordination staff. RTAG [could] only be claimed for journeys undertaken in order to support the service's network of Educators."

Similarly, broader supply-side funding was delivered under the CSP to the family day care sector through "FDC Operational Support" and "Sustainability Assistance" (targeted primarily towards a specific group of services) which were designed to support family day care services with the ongoing, day to day costs of delivering quality, affordable ECEC through its support for approved

services to fulfil their co-regulatory function, and thereby underpinning quality and placing downward pressure on out-of-pocket costs to families, until the CSP was terminated in 2015-16.

Clearly, there is a precedent for these types of sector specific funding mechanisms. It should be noted that when these funding systems were in place, including when the previous Educator Start-up Grant was available (i.e. prior to 2010-11), the family day care sector was thriving with 13,575 educators operating, which when compared to current numbers (approximately 9,300) represents a decrease of approximately 31.5% on current educator numbers.

CCS and non-standard hours loading

The CCS hourly rate cap for family day care must be amended immediately to more accurately reflect the cost of providing family day care. A formal review of the CCS hourly rate cap has been promised since the commencement of the CCS system in mid-2018 (initially scheduled for 2019, one year on from the commencement of the Child Care Package) and, despite the overwhelming evidence, we are still waiting as the family day care sector continues to decline.

When the Government's Child Care Package was developed, the cap price for family day care was calculated differently than other service types. The calculation that informs current cap rates was based on the projected mean fees at the time (2015), after removal of top 5% of fees, and were increased by 5.75% for family day care and 17.5% for other service types. FDCA sought clarification of the rationale for this significant differentiation in treatment of family day care compared with centre-based care. In summary, the (then) Australian Government Department of Education and Training advised that this approach was taken due to the following assumptions:

- inappropriate practices in the family day care sector (at that time);
- family day care sessions of care being typically 10 to 12 hours long;
- lower overheads; and
- fees charged for non-standard hours were lower or similar to standard hours.²⁰

FDCA accepted that the widespread unscrupulous activities in the family day care sector at that time would have impacted the data set the Government drew on,

19 Letter to FDCA from the Department of Education and Training dated 9 December 2016.

20 Letter to FDCA from the Department of Education and Training dated 9 December 2016.

thereby contributing to an inaccurate picture of legitimate fee charging practices. However, due to the Australian Government's significant work over recent years in eradicating fraudulent behaviour in the sector, FDCA maintains that the primary assumptions underpinning the calculations leading to the current CCS fee cap rates for family day care are no longer applicable and therefore invalid. It is therefore imperative that, following the closure of over 400 family day care services, the above rationale and assumptions be reviewed.

A much cleaner data set is now available showing that the average hourly rate for family day care is only slightly lower than that of the centre-based sector with a difference of 2.4%.²¹ FDCA contends that this represents a much more accurate picture of legitimate fee charging practices, and that the primary reasons for a comparable higher mean fee in the family day care sector reflect that:

- overheads in family day care are on par with those of centre-based day care;
- family day care charges are significantly closer to actual usage; and
- family day care is the primary ECEC option delivering non-standard hours care.

The ongoing disparity in the CCS hourly fee cap puts family day care at a competitive disadvantage, in that it leaves educators and approved providers unable to adjust their fees to keep pace with the rising cost of living, placing the sector as a whole under viability pressures (as can be evidenced in the ongoing drop in educator numbers) or it inequitably disadvantages families through higher out-of-pocket costs.

Furthermore, consultation with FDCA members indicates that fees charged for non-standard hours are significantly higher than those for standard hours and the current CCS hourly rate cap for family day care is not adequately recognising the actual cost of delivering family day care in non-standard hours care, and as such, is not allowing for family day care educators to be appropriately remunerated for the important work they do and/or disincentivises the provision of this care type.

The impacts of delivering this form of care on a family day care educator and their family are significant and this is not currently recognised by the ECEC family assistance payments framework. Importantly, this lack of recognition is also increasing out-of-pocket costs for families who need this type of care.

As such, FDCA is extremely supportive of the Productivity Commission ECEC Inquiry's recommendation 7.3 that the Australian Government should consider if a non-standard hours ECEC rate cap is required, in relation to family day care specifically.

The current CCS cap is not only inappropriate for *standard hours* family day care, as outlined above, it is vastly inadequate in the case of *non-standard hours* care which, in many cases, costs significantly more than care that is delivered in standard hours.

FDCA therefore urges the Australian Government to also invest in the provision of non-standard hours care provided by the family day care sector by applying an additional loading of 20% to the recalculated CCS fee cap for non-standard hours family day care. This measure will more appropriately reflect the actual cost of delivering this type of care, thereby ensuring that educators who provide this type of care are adequately remunerated and the future viability of this type of care is safeguarded.

Start up support for new educators and approved services

New family day care educators can face considerable costs in the establishment of their businesses in order to comply with regulatory standards and be appropriately equipped to run a family day care business, including, but not limited to, educational programming and play equipment, property modifications to ensure child safety (i.e. fencing, safety glass etc) insurances (i.e. home and contents, public liability, income protection etc), Certificate III level qualifications, and first aid, asthma and anaphylaxis training. This can act as a barrier for potential new entrants to the sector, which is problematic as the sector, as a whole, relies on new entrants for approved services to remain viable. Support for the educator in the establishment and initial growth phase of their small business is a vital component in reactivating sector growth.

From an approved service perspective, due to the increased cost of compliance, business administration and a number of market restrictions specific to the family day care sector, many services report difficulties in the recruitment of new family day care educators. Support for approved services in the engagement, training, support and monitoring of new educator small businesses is a key lever in supporting growth in the sector.

Like centre-based ECEC, family day care services must allocate significant resources in the recruitment, induction

21 Department of Education, Child Care in Australia report, September Quarter 2023.

and training of new educators entering the sector. However, unlike the centre-based care sector, which may be able to access a range of programs and initiatives that provide financial incentives and other support to assist centre-based services with attraction and retention of educators and staff e.g. the “Launch to Work” program, traineeship support, discounted care and professional learning programs. In contrast, there are no programs that directly support approved family day care services with the cost of engaging new family day care educator sole traders.

As such, FDCA recommends investment an expansion of the “Approved Service Engagement Payment” and “Educator Start-up Payment” mechanisms (i.e. a discrete and targeted supply-side funding structure designed to support family day care approved services to recruit, induct and train of new family day care educators) which are being trialled through the Family Day Care Capability Trial.

4.2.3 WORKFORCE

While the workforce challenges facing family day care and the wider ECEC sector are multifactorial, family day care must be considered as an integral part of any solution to address these challenges. Due to its unique structure, family day care has the capacity to provide innovative solutions to both the ECEC workforce and supply crises.

The evidence of under-supply across the regions is undeniable, compounded by national workforce shortages. If adequately supported, the family day care sector is uniquely placed to play a pivotal role in addressing under-supply and in turn, providing critical ECEC access, while supporting workforce participation and economic growth across the regions.

Building capacity through innovation

Significant opportunity exists for governments to build lasting, viable ECEC capacity through innovative approaches that leverage the capabilities of family day care. An innovation that demands further exploration to better support regional and rural families and communities, and under-served markets generally, is a broader application of ‘in-venue’ care. Partnerships between communities, local government, industry and providers, supported by a more streamlined regulatory approvals approach, could see suitable venues identified, modified and activated to meet the capacity requirements of smaller regional communities. Further to this innovation is the exploration of the opportunity for two family day educators to work from an appropriate single venue. This is backed by the Productivity Commission Inquiry

Final Report Recommendation 5.3 that in response to the challenges of ECEC supply across regional, rural and remote communities, a venue-based dual educator model should be established.

These proposals have the potential to quickly and efficiently inject sustainable, quality, long-term ECEC supply into under-served markets. The two educator/ one venue family day care model would provide a viable level of capacity in line with the needs of many regional communities that would otherwise be unsustainable through other models. Additionally, these proposals address a number of ancillary barriers to family day care recruitment and retention being, housing affordability, premises suitability and educator isolation.

Bespoke FDC Traineeship Program

Another innovation that warrants investment and exploration is the establishment of a dedicated, funded, national family day care ‘student educator’ (traineeship-like) program, which, among other benefits, would dramatically reduce the impact of the workforce barrier to entry created through the cessation of the “working towards Certificate III” provision under changes to the National Regulations. This is backed by Recommendation 3.4 in the Productivity Commission’s Final Report which recommends that the Australian Government “Develop bespoke traineeship pathways for family day care settings HumanAbility, in consultation with governments, the Australian Children’s Education and Care Quality Authority, training providers and family day care providers, should develop tailored pathways that encourage traineeships to be undertaken in family day care settings.

In summary such a proposal (under specified guidelines and conditions) would look as follows:

- a “student educator” could be employed by the approved service under a dedicated, funded, centrally administered program;
- the working towards Certificate III “student educator” is paired with an existing family day care educator;
- the student educator works and studies part-time in an accelerated Cert III in ECEC;
- the pairing allows for an increase to the capacity of the premises such that the educator/student pairing could (under prescribed circumstances) cater for up to 6 children under school age (as opposed to 4), which also effectively reduces the combined educator to child ratio to 1:3 under school age. Note that this would not change the maximum ratio of 1:7 allowable under the National Regulations; and

- upon completion of the program the student educator would transition to becoming an independent contractor educator in their own right.

Some key benefits of the proposed program are that it:

- provides for an immediate 50% increase in capacity of participating educators (with a lower educator to child ratio);
- allows for an immediate increase to ECEC supply in areas of high need, increasing accessibility which allows more Australian children a better start in the early years;
- creates a pipeline of paid, experienced and ultimately qualified new educators while partially mitigating the additional barrier to entry from the cessation of the “working towards Certificate III” provision;
- is partially self-funded through the additional revenue generated from the increased capacity; and
- is a highly efficient and more sustainable mechanism (in contrast to building centres) to address ECEC shortages in regional areas and “thin markets” specifically, through compounding capacity; and has a number of ancillary benefits, such as increasing educator wellbeing through a reduction in the inherent isolation felt by family day care educators, bolstering service viability and providing diversified entry pathways into the ECEC sector.

National Recruitment Program

In late 2021, FDCA launched the ‘Your Business, Their Future’ family day care educator recruitment program to promote family day care as a career of choice, and to support approved services to connect with prospective educators, and in doing so, enhancing the recruitment pipeline through a nationally consistent and centralised recruitment function, reducing administrative burden and streamlining the process of entering the family day care sector.

Through applicant pre-screening of qualifications, fitness and propriety checks, and suitability of premises assessments, FDCA delivers ‘pre-qualified’ leads to approved service members, dramatically reducing the duplication of effort in educator recruitment across the sector. FDCA provides ongoing support to applicants in their recruitment journey and builds capacity at the local level through recruitment insights and good practice guidance for approved service members.

The program has achieved significant success with over 100 educators placed with 75 approved services since its inception and showcases the value of engaging specialist skills in an efficient, targeted and centralised national recruitment program.

FDCA contends that given the success of the program to date, and the existing infrastructure, systems and processes already established, it would be appropriate to scope how the program could be resourced to expand to increase recruitment capacity and remain a viable, sustainable program an actively grow educator numbers.

Encouraging workforce participation for priority groups

As outlined above, there exists a high level of cultural and linguistic diversity among the family day care educator workforce itself.²² Research undertaken by FDCA on behalf of the Commonwealth Department of Education showed that:

- While the majority of educators (1,025 or 50.9%) were born in Australia, 49.1% of educators were born overseas : India at 7.7% (n=155), Sri Lanka at 3.5% (n=71), United Kingdom at 3.2% (n=65), Bangladesh at 3.0% and Pakistan at 2.2%.
- The majority of educators (57.9%; n=1,166) identified English as their primary and sole language spoken, which means that 42.1% of educators speak a language other than English, a significantly higher proportion than the general population of Australia, at 22.5%²³.
- After English and Arabic, the next 5 most identified languages spoken were: Hindi at 3.4% (n=68), “other” at 3.2% (n=65), Bengali at 3.0% (n=60), Sinhala at 2.7% (n=54) and Punjabi 2.5% (n=50).
- The top ten cultural backgrounds that respondents identified with were:
 - Australian (44.8%)
 - Indian (5.8%)
 - English (3.2%)
 - Bangladeshi (2.8%)
 - Sri Lankan (2.4%)
 - Pakistani (2.1%)
 - Lebanese (1.8%)
 - Chinese (1.5%)
 - Somali (1.4%)
 - Iraqi (1.4%).

22 Family Day Care Australia, (March 2023), Family Day Care Educator Demographic Research. Unpublished report prepared for the Commonwealth Department of Education.

23 ABS Census data (2021). See <https://www.abs.gov.au/articles/cultural-diversity-australia>

The current proportion of educators in family day care from a CALD background, in addition to the existing evidence that shows family day care already plays a significant role in meeting the needs of children from (or children who had parents/guardians from) a refugee or special humanitarian program background, reveals strong connections with communities from sub-continent cultures.²⁴ This suggests that there is potential to grow this capacity in the family day care sector to both support the future care needs of these communities and to also promote family day care to members of CALD communities as a career opportunity.

Further research is urgently required to delve deeper into the future care needs of the Australian workforce *from a cultural and linguistic diversity perspective*. Recent research published by the Department of Foreign Affairs and Trade²⁵ points to significant future care needs from the Indian diaspora community, where there is a larger share among Indian-born people aged 25 to 39 as well as a larger percentage of children under the age of nine, compared to the general Australian population. This age profile, combined with other demographics, illustrates the potential economic contributions that the Indian diaspora may make in the future, if their care needs are met.

There is a clear case for the need for further exploration of family day care's apparent suitability as a career option for CALD women (primarily) in addition to its evident capacity to respond to the ECEC needs of CALD communities. Encouraging greater participation by priority groups in family day care requires additional targeted initiatives that take the structure of the family day care model into account and target the specific needs and circumstances of groups as well as address community needs.

5. CONCLUSION

In summary, governments should support the implementation of a range of measures to better leverage the capabilities of the family day care sector in boosting access to quality, flexible and affordable early ECEC across under-served areas, in turn supporting increased women's workforce participation, and importantly, ensuring families have choice in selecting an ECEC type that suits their diverse and individual needs.

Mechanisms must be established that are specific to the family day care sector relating to incentivising entry into the sector, the need for qualification pathways and workforce support structures and/or programs to be specific to family day care, emphasising its unique potential for CALD cohorts and those in regional areas.

Given its unique model and capabilities, family day care should be central to all future reform considerations seeking to improve the affordability, accessibility flexibility of ECEC options available to families. Furthermore, in seeking strategies to improve workforce participation of priority groups, enhance access to non-standard hours ECEC, increasing supply across regional, rural and remote Australia, and for specific cohorts of vulnerable and disadvantaged children and families, those with additional needs and those from CALD backgrounds.

The ECEC needs of children and families across Australia are fundamentally diverse and disparate and, as such, there is no 'one-size-fits-all' model. For many families, family day care is their only choice, for many more it is their option of choice. A truly universally accessible ECEC system that meets the needs of children and families is unattainable without a robust and growing family day care sector.

24 Department of Education, Skills and Employment (August 2022), 2021 ECEC National Workforce Census, prepared by the Social Research Centre.

25 Department of Foreign Affairs and Trade, (2022), Australia's Indian Diaspora: A National Asset.

Deloitte.



Family Day Care Australia
Review of the Workforce Output Model

23 September 2021

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Scott Rollason
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23 September 2021

Dear Scott,

RE: Workforce Output Model Review

We are pleased to provide you a report which outlines our review of Family Day Care Australia's (FDCA) Workforce Output Model.

We would like to take this opportunity to thank FDCA for engaging Deloitte to complete this work and thank all staff for their cooperation during this engagement.




Please do not hesitate to contact me on 0430 188 993 should you require further explanation or comment in relation to the matters raised in this report.

Yours sincerely,

A handwritten signature in black ink that reads "Angela Jaric". The signature is written in a cursive style with a large initial 'A'.

Angela Jaric
Partner, Deloitte Risk Advisory

Contents

	1. Executive Summary	6
	2. Model Review	9
	3. Appendices	19

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Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Any projection of the evaluation of the control procedures to future periods is subject to the risk that the systems may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We believe that the statements made in this report are accurate, but no warranty of completeness, accuracy, or reliability is given in relation to the statements and representations made by, and the information and documentation provided by Family Day Care personnel. We have not attempted to verify these sources independently unless otherwise noted within the report.

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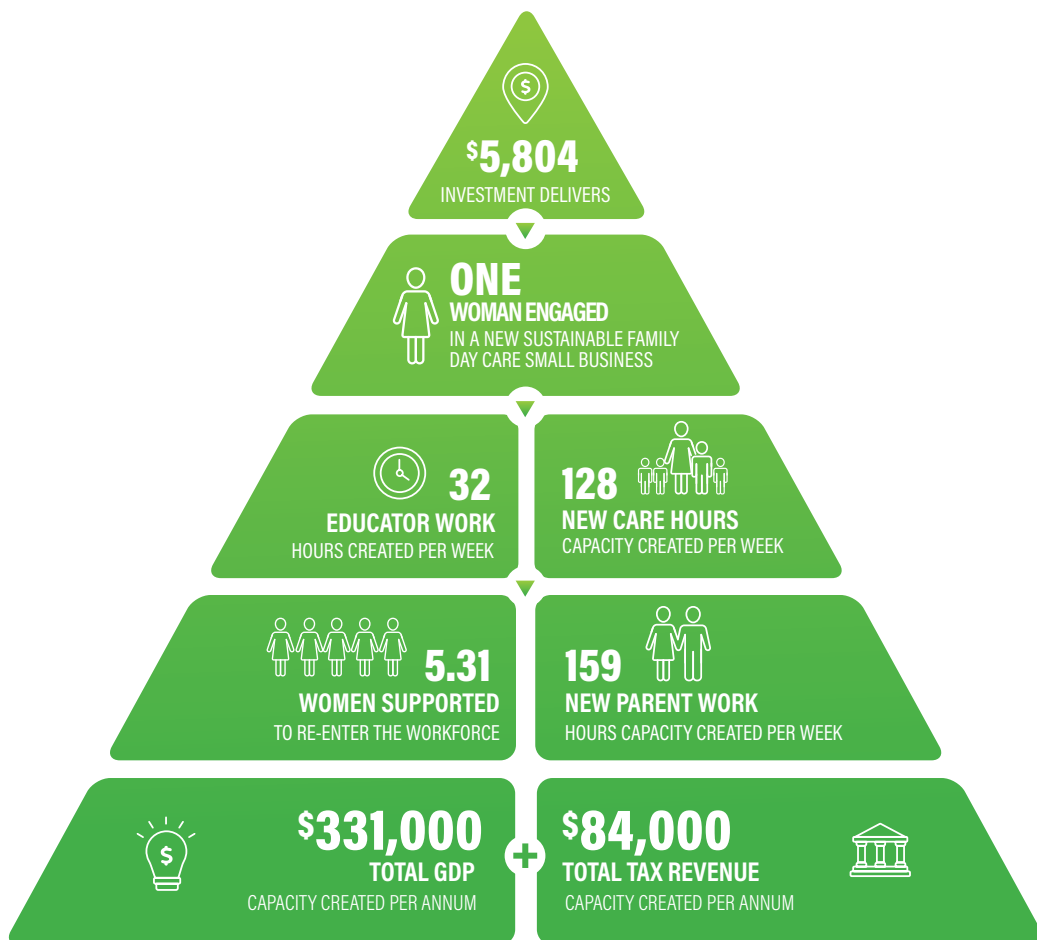
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Workforce Output Model: ROI Snapshot

The *Workforce Output Model: ROI Snapshot* below provides a graphic summary of the return on investment of additional targeted funding programs for family day care through incentivising new educators to enter the sector and providing additional support to services to engage them. This is explored in detail throughout the report, though in essence it shows that a funding injection of \$5,804 generates 191 new work hours per week and approximately a \$331,000 annual contribution to GDP, or more simply put, each \$1 invested returns 1.58 new weekly work hours capacity and approximately a \$57 annual contribution to the GDP of Australia.



1. Executive Summary



Executive Summary

1.1. Background and Context

Why the need for change?

The positive impacts of quality early childhood education and care (ECEC) on a child's future education, work and life outcomes is strongly substantiated by research in the field and now widely recognised as indisputable. Robust evidence exists to demonstrate that quality ECEC leads to positive broader economic impacts on GDP, through facilitating greater participation of women in the workforce and associated increased productivity gains, as well as by reductions in Government expenditure currently allocated to remedial education, criminal justice and health services¹.

Family day care is an important component of the ECEC landscape in Australia, providing affordable and flexible education and care in a home-like, small group environment². Furthermore, working as a family day care educator provides Australians, primarily women, an opportunity to start their own micro-business.

As the national peak body for the sector, Family Day Care Australia (FDCA) has expressed significant concern about the future viability of the sector due to the significant and sustained reduction in numbers of educators. This decrease is due to a number of factors, including:

- Challenges regarding recruitment and retention in the ECEC sector;
- Increased administrative and compliance burdens;
- Regulatory market restrictions; and
- Barriers to entry into the sector for both services and educators³.

FDCA is concerned that, if allowed to exacerbate, the decline in educator numbers will have an adverse impact on the supply of educators and ECEC choices available to Australian families, especially in rural and regional areas, thereby hampering economic productivity.

FDCA has determined that an option to address this challenge, as well as contribute to a number of the Australian Government's key objectives targeting women and support to Australia's post pandemic recovery, is through additional targeted investment in the family day care sector.



¹Putting a value on early childhood education and care in Australia (2014) PWC; *Lifting Our Game, Report of the Review to Achieve Educational Excellence in Australian Schools through Early Childhood Interventions* (2017), State of Victoria.

²*Childcare and Early Childhood Learning, Inquiry Report No. 73* (2014) Productivity Commission, Canberra.

³*Sector Viability Brief* (2019), FDCA, from https://uploads.prod01.sydney.platformos.com/instances/97/assets/public-pdf/Submissions-and-Briefs/FDCA_SectorViabilityBrief_online.pdf?updated=1585200197.

Executive Summary

1.1 Background and Context

The Family Day Care Workforce Output Model

The Workforce Output Model (the Model), as outlined in **Figure A**, was developed in July 2021.

The Model details the economic outcomes associated with additional government funding in engaging new and innovative educator opportunities to provide education and care to enable workforce participation. Further, the Model also illustrates the potential economic benefits of the Australian Government providing additional targeted funding to support the viability of the family day care sector by incentivising new educators to enter the sector and providing additional support to services to engage them.

FDCA envisage this additional targeted funding to support an increase in output benefits which would align with a number of Australian Government objectives and initiatives, including:

- Increased women's workforce participation;
- Decreased frictional and structural unemployment;
- Increased labour productivity and innovation;
- Increased economic security for more women;
- Strengthened economic growth due to increases in consumption, business investment and GDP;
- Increased tax revenue meaning a reduced chance of fiscal deficit; and
- Increased options for early education and care opportunities in regional and rural areas.

A more detailed overview of the Model including a review of the Model's values is outlined in **Section 2** of this report.

Educators	
Number of new educators engaged (N)	1.00
Investment	
Educator Start-Up Grant	\$ 1,750.00
Service Engagement Subsidy	\$ 4,054.00
Investment required (1 educator)	\$ 5,804.00
Total investment required (N educators)	\$ 5,804.00
Return on Investment	
Care hours provided (per Educator)	
Hours / Day	8.00
Days / Week	4.00
Children under school age	4.00
Care hours provided (1 educator)	128.00
Total care hours provided (N educators)	128.00
Children cared for (per Educator)	
Avg. hours utilised / Child	24.10
Children cared for / Educator	5.31
Total children cared for (for N educators)	5.31
Additional Working Hours Capacity Created (per New Educator)	
Educator hours of work created per week (1 educator)	32.00
Educator hours of work created per week (N educators)	32.00
Average work hours per week (women)	30.00
Parent work hours created per week (1 educator)	159.34
Parent work hours created per week (N educator)	159.34
Total work hours created per week (1 educator)	191.34
Total work hours created per week (N educators)	191.34
Total work hours created per annum (48 weeks) (1 educator)	9,184.13
Total work hours created per annum (48 weeks) (N educator)	9,184.13
Work hours created per dollar invested (1 educator)	1.58
Work hours created per dollar invested (N educator)	1.58
Average hourly earnings (women)	\$ 36.00
Total contribution to GDP per dollar invested (1 educator)	\$ 56.97
Total contribution to GDP per dollar invested (N educators)	\$ 56.97
Total GDP ROI per annum (1 educator)	\$ 330,628.78
Total GDP ROI per annum (N educators)	\$ 330,628.78
Tax on new income earned per parent (1 educator)	\$ 8,438.20
Tax on new income earned per parent (N educators)	\$ 8,438.20
Tax on new income earned per parent (1 educator)	\$ 7,315.00
Tax on new income earned per parent (N educators)	\$ 7,315.00
Total tax revenue (1 educator)	\$ 83,649.49
Total tax revenue (N educators)	\$ 83,649.49

Figure A. The FDCA Workforce Output Model.

Executive Summary

1.2. Scope and Limitations

Scope

With reference to the engagement letter dated 28 July 2021, enclosed are the results of Deloitte's review of the Model. The specific scope of the review was agreed with FDCA's General Manager.

Specifically, Deloitte were requested by FDCA to:

- Review the values used in the Model prepared by FDCA, including assumptions applied, against publicly available source information as outlined in **Appendix B**.

Our work was conducted across the month of August 2021 and included the following procedures:

- *Management discussion*: we consulted with key FDCA personnel to augment our understanding of the current educator demise and development of the Model (refer to **Appendix A** for a list of business personnel consulted).
- *Review of artefacts*: we reviewed relevant Family Day Care Australia and government artefacts to gain a stronger understanding of the development of the Workforce Output Model and the perceived economic impact (refer to **Appendix B** for a list of the documents sighted).

Limitations

- Observations and recommendations have been based on the artefacts and personnel engaged, as outlined in **Appendix A** and **B**.
- Review of the Model was undertaken with reference to the source data outlined in **Appendix B**. The source data used for this engagement were provided to us by FDCA. We did not assess the appropriateness of these sources.
- We have not assessed the design or logic used in the Model.
- In undertaking the review, our examination was limited to the Model made available to us in July 2021.
- No financial evaluation or benefits analysis of the Model was undertaken as part of this review.

2. Model Review



Model Review

2.1. The Family Day Care Workforce Model

The Model

The Model outlined in **Figure A** aims to address the instances where the parent may be seeking work and details the economic outcomes associated with additional government funding used towards engaging new educators to provide education and care to enable workforce participation.

For simplicity and transparency, figures represent the gain or impact of one educator only. However, the model is primarily designed to reflect the economic output associated with multiple educators if desired (as adjusted by the initial variable, N).

Figures are based on statistical data drawn from multiple institutions and informal data such as reports from current services and educators. Given the changing nature of economics and rates, these values remain approximate at the time of analysis and average figures are generally employed. To ensure that the methodology used to reach economic outputs is clear and supported, the Model is divided into sections as outlined in **Figure B** that consider appropriate inputs. The source for each value and Deloitte's review of each value is detailed through **Section 2** of this report.

How to read the following pages

Deloitte has reviewed the values applied in the Model prepared by FDCA, including assumptions applied, against publicly available source information as outlined **Appendix B**. Where exceptions were noted; Deloitte have provided recommendations for consideration for FDCA Management.

The following pages outline results of our examination of the values and assumptions applied to the Model.

Sections of the Model

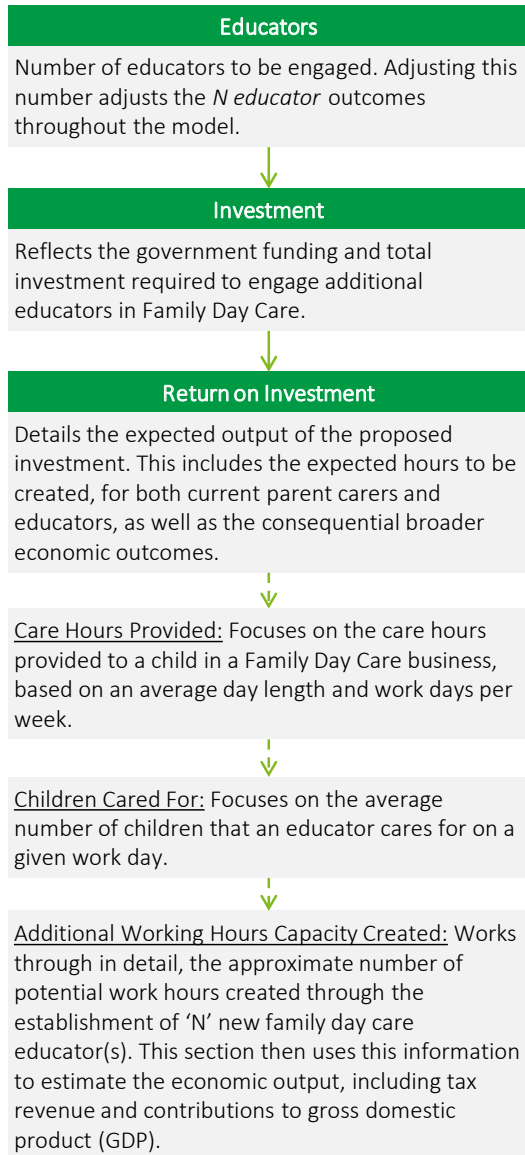


Figure B. Inputs of the FDCA Workforce Output Model .

Model Review

2.2. Review of the Model Values

The following table outlines outcomes from Deloitte’s review of the information used and assumptions applied in the Model against source data outlined in **Appendix B**. This review is to be read in conjunction with the Model outlined in **Figure A**.

Model Value	Result of the review of the Model Value
Section: Educators	
Number of new educators engaged (N) = 1	This is an arbitrary figure used for the purposes of this Model. It is based on a 1 new educator basis, and the formula within the Model caters for the figure to change based on the number of educators.
Section: Investment	
Educator Start-Up Grant = approx. \$1,750	This is an arbitrary figure, used for the purposes of this model. It is based on a start-up grant with similar features that were previously available. For each additional educator, an expected grant of \$1,750 will be received. This grant was available prior to 2010 / 2011 and is the Department of Education equivalent of \$1,500, adjusted for inflation (CPI).
Service Engagement Subsidy = approx. \$4,054	This is drawn from staff labour costs for educator recruitment and obtained from the Wynnum Family Day Care. It approximates the cost of onboarding an educator over an initial 3-month period, based on 87 hours of recruitment efforts, to be \$4,054.
Total Investment = approx. \$5,804 (per 1 educator)	The expected total initial investment, which combines the Educator Start-Up Grant and the Service Engagement Subsidy. Therefore, for each educator that is engaged, the expected total investment is \$5,804.
Section: Return of Investment	
Hours per Day= approx. 8 hours	The average number of hours that an educator works per day. Family Day Care sessions typically range from 6 to 8 hours; 8 hours is used for the purposes of this model given that a full work day is being considered. This was drawn from the Child Care Package Evaluation which was developed by the Australian Institute of Family Studies (AIFS) ¹ .
Days per week = 4 days	The usual number of days that a single educator is engaged in Family Day Care is 4 days. This is anecdotal and drawn from data collected by the FDCA. Note: recent national ECEC Workforce Census data (2016) indicates a significant majority work above 35 to 41 hours ² .
Children under school age = 4 children	The maximum number of under school- aged children allowed per session, under the supervision of one educator is 4 children (as per the Education and Care Services National Regulations, Reg 124). Under these rules, an educator can additionally have 3 school-aged children outside school hours. Therefore, the average number of children cared for per educator would likely be higher, however these children would not be present for the full number of hours.
Total care hours provided per week = approx. 128 hours	The total number of care hours provided to four children by one educator over a given week is taken to be 128 hours. This is obtained through multiplying the care hours spent per day by the number of days per week and the number of children cared for per week.

¹Child Care Package Evaluation, Australian Institute of Family Studies (2019), pg. 49 [https://aifs.gov.au/sites/default/files/publication-documents/1907_cce_early_monitoring_report_citation.pdf]

²2016 ECEC NWC State Regional Tables, Department of Education, Skills and Employment [<https://www.dese.gov.au/key-official-documents-about-early-childhood/resources/2016-ecec-nwc-state-regional-tables>]

Model Review

2.2. Review of Model Values

The following table outlines outcomes from Deloitte’s review of the information used and assumptions applied in the Model against source data outlined in **Appendix B**. This review is to be read in conjunction with the Model outlined in **Figure A**.

Model Value	Result of the review of the Model Value
Section: Return of Investment	
Average hours utilised per child = 24.1 hours	The average number of hours a child spends at Family Day Care each week is 24.10 hours. This is based on data presented by the Department of Education, Skills and Employment (DESE) in December 2020 ³ .
Number of children cared for per educator = 5.31 children	Across the modelled week (four 8-hour days) the average number of children that an educator cares for is 5.31 children. This is calculated by dividing the total number of care hours provided by an educator by the average number of hours utilised per child.
Educator hrs of work created / week = 32 hours	For each additional educator, the number of care hours created in a given week is 32 hours. As such, this represents the number of hours of work created for educators over an average week. This value is reached by multiplying the Hrs / Day by the Days / Week that an educator spends caring for children at Family Day Care.
Average work hrs / week (women) = 30 hours	The average number of hours worked per week by women is 30 hours. This figure was sourced from the Australian Bureau of Statistics (ABS) ⁴ . The focus is placed on women as this reflects the fundamental focus of increasing women in the workforce and therefore aligns with government objectives.
Parent hrs of work created / week = approx. 159.34 hours	For each additional educator, the total number of work hours created per week for parents (specifically women) through their involvement with Family Day Care is 159.34 hours. This is calculated by multiplying average number of children cared for by an educator by the average number of working hours per week for women.
Total work hours capacity created / week = 191.34 hours	For each educator that is engaged, the total number of work hours created per week between parents and educator is 191.34 hours. It is calculated by adding the educator and parent work hours created.
Per annum (48 Weeks) = 9,184.13 hours	For each additional educator that is engaged, the approximate total number of work hours created across a given year (48-weeks, for both female parents and educators) is 9,184.13 hours. A 48-week annum is used as this is the minimum period that a Family Day Care must operate each year. This was drawn from the Child Care Package Evaluation which was developed by the Australian Institute of Family Studies (AIFS) ¹ .
Work hours created per dollar invested = 1.58 hours	For every dollar that is invested into engaging an additional educator, approximately 1.58 hours of work will be created. This is calculated over a 48-week period through dividing the total number of work hours created by the total investment amount.
Average hourly earnings (women) = \$36.00	The average hourly earnings of female employees is \$36.00 per hour (sourced from annual data from the Australian Bureau of Statistics) ² .

¹Child Care Package Evaluation, Australian Institute of Family Studies (2019), pg. 49 [https://aifs.gov.au/sites/default/files/publication-documents/1907_cce_early_monitoring_report_citation.pdf]
²2016 ECEC NWC State Regional Tables, Department of Education, Skills and Employment [https://www.des.gov.au/ky-official-documents-about-early-childhood/resources/2016-ecec-nwc-state-regional-tables]
³Department of Education, Skills and Employment (2020) Child Care in Australia report December quarter 2020 (Table 6.1) [https://www.des.gov.au/early-childhood/resources/december-quarter-2020]
⁴Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016, Australian Bureau of Statistics [https://www.abs.gov.au/ausstats/abs@.nsf/main/9201.0-2016-Main%20Features-Employment%20Data%20Summary%207]

Model Review

2.2. Review of the Model Values

The following table outlines outcomes from Deloitte’s review of the information used and assumptions applied in the Model against source data outlined in **Appendix B**. This review is to be read in conjunction with the Model outlined in **Figure A**.

Model Value	Result of the review of the Model Value
Section: Return on Investment	
Total Contribution to GDP per dollar invested = \$56.97	<p>For every dollar that is invested into obtaining an additional educator, approximately \$56.97 will be contributed to Australia’s Gross Domestic Product (GDP). This is representative of the total number of work hours created across the 48-week period.</p> <p>It is calculated by multiplying the work hours created per dollar invested by the average hourly earnings for women.</p>
Total GDP Return on Investment (ROI) per annum = \$330,628.78	<p>The total GDP return on investment per 48-weeks annum by engaging one educator is \$330,628.78. This is representative of the educator and parents of the average number of children cared for (5.31 children).</p> <p>It is calculated by multiplying the total new work hours created per annum by the average hourly earnings for women.</p>
Tax on new income earned per educator = \$8,438.20	<p>The approximate tax revenue on new income that will be generated from an educator’s earnings by engaging an additional educator is \$8,438.20.</p> <p>Given the average number of work hours in a given week for an educator is 32 hours, they are expected to work 1,536 hours across a 48-week period. Using an average earnings of \$36.00 per hour, the educator will earn an average of \$55,296 across the 48-week period. Based on 2021 MTR, this equates to a tax income of $\\$5,092 + 0.325 (\\$55,296 - 45,000) = \\$8,438.20$.</p>
Tax on new income earned per parent = \$7,315.00	<p>The approximate tax revenue on new income that will be generated from a parent’s earnings by engaging an additional educator is \$7,315.00.</p> <p>Given the average number of work hours in a given week for a parent is 30 hours, they are expected to work 1,440 hours across a 48-week period. Using an average earnings of \$36.00 per hour, the parent will earn an average of \$51,840 across the 48-week period. Based on 2021 MTR, this equates to a tax income of $\\$5,092 + 0.325 (\\$51,840 - 45,000) = \\$7,315$.</p>
Total tax revenue = \$83,649.20	<p>The expected tax revenue that will be generated based on one educator caring for an average of 5.31 children is \$83,649.20.</p> <p>It is calculated by adding the tax on new income earned for a parent and educator (\$15,753.20) and then multiplying this figure by the total number of children cared for (5.31).</p>

Model Review

2.3. Observations

In reviewing the Model assumptions in consultation with the FDCA personnel engaged and outlined in **Appendix A**, we identified 1 observation for FDCAs consideration, as follows:

Observation	Recommendation
<p>1. In undertaking our review we identified that the Model was built upon a number of assumptions.</p> <p>Specifically we identified the Model assumes that:</p> <ul style="list-style-type: none"> • Each child in care is from a two parent household. The current family set up as such that one parent looks after the child and the other parent is currently employed. It is therefore assumed that one parent will be able to enter the workforce. • The parent currently caring for the child is assumed to be the mother and, therefore, the parent returning to work will be a female. • Only female educators are engaged given the consideration of the average weekly hours and hourly earnings of women only. • The parent is willing and able to engage in work, that the parent can choose any type of role and will not be limited by their abilities or available opportunities. • The parent returning to work will be returning to work for an average period of 30 hours per week. Standard family day care hours are assumed to be 8 hours of care a day, 4 days a week. • Each parent only has one child requiring care and this is apparent through the one child creating work hours for one parent. <p>Therefore, the Model does not consider:</p> <ul style="list-style-type: none"> • Parents who may not want to return to work if their child is in family day care. • Households where neither parent is looking after the child (i.e. grandparents, relatives, friends or other paid services are currently utilised for the child during work hours while the parents are at work). • Male educators or fathers returning into the workforce. The Model employs earnings and average working hours for women only. • Parents who may be limited in their choices of work or are not able to find work. • Parents with multiple children. 	<p>A. To ensure assumptions are valid and discoverable, we recommend FDCA document assumptions applied through the Model against source data.</p>

2. Appendices



Appendix A

3.1. FDCA Personnel Engaged

Name	Role Description	Period of Engagement
Scott Rollason	General Manager	August 2021
Michael Farrell	Advocacy and Engagement Manager	August 2021
Andrew Paterson	Chief Executive Officer	August 2021

Appendix B

3.2. Resources considered as part of this review

Resource	Source
Child Care Package Evaluation: Early monitoring report (July 2019) – Australian Government, Institute of Family Studies	https://aifs.gov.au/sites/default/files/publication-documents/1907_cce_early_monitoring_report_citation.pdf
Family Day Care Sector Profile (September 2019) – Family Day Care Australia	https://uploads.prod01.sydney.platformos.com/instances/97/assets/public-pdf/Representing-You/Sector-Profile/FDCA_SectorProfileSep19_online.pdf?updated=1585626569
Family Day Care Business Model (Last updated 27 March 2015) – Australian Government, Department of Social Approved Services	https://www.dss.gov.au/sites/default/files/documents/05_2015/family_day_care_business_model.pdf?_hstc=58085109.5c34ab7bf88e972fdd7a7debc8575bac.1473897600112.1473897600113.1473897600114.1&_hssc=58085109.1.1473897600115&_hsfp=1773666937
Guide to the National Quality Framework (Last updated September 2020) - Australian Children's Education & Care Quality Authority	https://www.acecqa.gov.au/sites/default/files/2020-09/Guide-to-the-NQF-September-2020.pdf
Fair Work Commission, <i>Children's Approved Services Award 2010</i> MA000120, 27 October 2020, cl 23 ('the Award')	https://awardviewer.fwo.gov.au/award/show/MA000120
Consequences of non-compliance with the Family Assistance Law (November 2018) – Family Day Care Educator Toolkit, Department of Education & Training, Australian Government	http://www.fdcsupport.org.au/new/wp-content/uploads/fdc-toolkit-7.pdf
Attracting the next generation of family day care educators (February 2019) – Family Day Care Australia, report prepared by Survey Matters	https://www.familydaycare.com.au/supporting-you/nextgen
Independent contractors and employees - Australian Government, Fair Work Ombudsman	https://www.fairwork.gov.au/find-help-for/independent-contractors
Difference between employees and contractors - Australian Government - Australian Taxation Office	https://www.ato.gov.au/business/employee-or-contractor/difference-between-employees-and-contractors/
Infection control in childcare settings Communicable Diseases Intelligence, Volume 21, Issue number 22 -27 November 1997	https://www1.health.gov.au/internet/main/publishing.nsf/Content/cda-pubs-cdi-1998-cdi2201-cdi2201d.htm
Perspectives on Quality in Australian Family Day Care (February 2016) – Social Policy and Research Centre, UNSW	https://www.researchgate.net/publication/312593573_Perspectives_on_quality_in_Australian_family_day_care
What Determines Quality in Child Care? (September 2008) – Research to Practice Notes, NSW Department of Community Approved Services	https://www.facs.nsw.gov.au/_data/assets/pdf_file/0006/321594/researchnotes_what_quality.pdf
A Smart Investment for a Smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia – The Front Project 2019	https://www.thefrontproject.org.au/images/downloads/ECO%20ANALYSIS%20Full%20Report.pdf
Average hourly earnings of female and male employees (2004 to 2017 Annual data ABS characteristics of employment)	https://data.gov.au/data/dataset/average-hourly-earnings-of-female-and-male-employees/resource/5684f83a-9f1b-41db-86e7-43b20ba0b6c1
Australia's Gender Pay Gap Statistics 2021	https://www.wgea.gov.au/sites/default/files/documents/Gender_pay_gap_fact_sheet_Feb2020.pdf
2016 ECEC NWC State Regional Tables, Department of Education, Skills and Employment	https://www.dese.gov.au/key-official-documents-about-early-childhood/resources/2016-ecec-nwc-state-regional-tables
Department of Education, Skills and Employment (2020) Child Care in Australia report December quarter 2020 (Table 6.1)	https://www.dese.gov.au/early-childhood/resources/december-quarter-2020
Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016, Australian Bureau of Statistics	https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0~2016~Main%20Features~Employment%20Data%20Summary~67

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