

Submission: Inquiry into the Early Childhood Education and Care (Three Day Guarantee) Bill 2025



February 2025

Introduction:

We believe that the Three-Day Guarantee Bill 2025 (the Bill) is a pivotal step toward ensuring early childhood education and care (ECEC) is accessible to all families, regardless of geographic, socio-economic, or cultural background. We believe as is articulated in Fredman et al (2002) that early childhood education is more than just a service, it is a fundamental right that shapes lifelong opportunities. Equity in access to ECEC is critical in overcoming historical disadvantages experienced by First Nations communities, single-parent households, migrant families, and Regional, Rural and Remote (RRR) women.

This submission builds on the Joint Submission between the National Rural Women's Coalition (NRWC) and the Isolated Children's Parents Association of Australia (ICPA) from February 2024, which outlined key concerns and recommendations regarding early childhood education and care (ECEC) access for RRR, regional, and remote communities.

Key findings from our previous joint submission included:

- **Need to Address Structural Barriers to ECEC Access:** Families in remote areas face significant geographic, financial, and workforce-related barriers that limit their ability to access early education services.
- **The Gendered Impact of Childcare Inequality:** The unavailability of ECEC in RRR areas disproportionately affects women's workforce participation, reinforcing economic disparities.
- **Equity-Based Funding Models:** The current funding structures do not adequately account for the higher costs of service provision in RRR and remote areas, leaving communities without sustainable early learning options.
- **Culturally Responsive Early Learning:** First Nations children and families from linguistically diverse backgrounds face additional structural barriers in accessing culturally appropriate and inclusive early education.

This submission reinforces the urgent need for an equity aligned approach to early childhood education and care (ECEC). The Three-Day Guarantee Bill 2025 represents a critical policy mechanism to address the long-standing structural inequalities. We provide a critical discussion of the barriers to achieving this in RRR in our submission. The NRWC strongly believes that to achieve parity, every child in RRR, regardless of where they live, needs to be able to access ECEC. Only if this can be achieved and there is a commitment to explore solutions to this then we suggest that we should see an uplift in communities. In turn, the NRWC sees future generations of women and their children thriving in RRR Australia. The discussion about the Bill should not be about rights to access high-quality Early Childhood Education and Care (ECEC); it should be about how we make this happen knowing that it is crucial for children's development and has significant implications for women's participation in the workforce.

We would like to take this opportunity to advocate for the space to speak at the Inquiry to further expand on our submission.

About the National RRR Women's Coalition (NRWC)

The NRWC is a national advocacy organisation representing women in regional, rural and remote (RRR) Australia. We support policies that enhance gender equity, social inclusion, and economic participation, particularly for women and children in under-resourced areas.

We play a critical role in advancing gender equity in health, education, and economic opportunities for women and children in RRR Australia. We align with WHO's commitment to equity. This means the NRWC works to amplify the voices of RRR women, ensuring that their unique challenges, such as limited healthcare access, geographic isolation, and economic disparities are understood, highlighted and addressed through policy advocacy, emancipatory programs and initiatives. By focusing on intersectional barriers like gender, location, and socio-economic status, the NRWC strengthens RRR women's capacity to influence systemic change, advocating for improved maternal and reproductive healthcare, gender-responsive policies, and economic empowerment initiatives. This work is crucial because RRR women often face greater inequities and have access to fewer resources than their urban counterparts. The NRWC therefore, engages in targeted action essential to achieving true gender equity and social inclusion across Australia.

The NRWC works tirelessly to address systemic disparities in all aspects of women's lives in RRR Australia. We advocate for women, their children, families and communities arguing that gender is not an incidental label which confines and erodes choice, but it is the result of entrenched power structures that marginalise certain people, especially in RRR communities. Addressing these inequities requires targeted policy interventions that actively dismantle structural oppression and promote meaningful inclusion, ensuring that all women in RRR communities, particularly those historically disadvantaged, have equitable access to resources and opportunities.

NRWC Support for the Bill

We wholeheartedly believe that the Bill 2025 provides a significant opportunity to gain ground for women and children living in RRR areas and embed more equity into Australia's early childhood education framework. We believe that all children, regardless of their location or background, must receive a guaranteed minimum of three days ECEC per week. This right would align with Australia's commitment to equity in education and gender inclusion. However, our submission highlights opportunities with the Bill which will prevent its intent, and we provide solutions to assist with these to be dismantled.

From a social justice standpoint, the NRWC supports the basic requirement for equitable access to ECEC as this is empirically proven to contribute to reducing barriers for participation of women enabling them to have increased choices in RRR communities; particularly those from marginalised backgrounds. For instance, it is well documented that women in RRR Australia are more likely to face barriers to workforce participation due to caregiving responsibilities, this reinforces economic dependence and limits their ability to break cycles of financial insecurity. We believe that by improving access to childcare, this Bill with the provision of a minimum of three days of ECEC will strengthen women's workforce participation, in turn, advancing their economic inclusion and thus enabling gender equity (recently discussed by Casey, Kim & Reid, 2025).

Additionally, the NRWC believes that this Bill must address the intersectional needs of families in First Nations and culturally diverse communities. Research shows that it is these women, and their children who often face structural discrimination which is exacerbated by geographic isolation in accessing ECEC (Holden & Zhang, 2018). The NRWC wishes to highlight that our submission focuses on the emancipation of women and therefore through a feminist structural and intersectional lens, this Bill must be understood as more than an educational reform; it is a necessary intervention to dismantle

systemic barriers that disproportionately impact children based on their intersecting identities, including gender, race, class, and geography. The NRWC is committed to addressing structural inequities by ensuring that every child, regardless of their postcode or social positioning, has an equitable foundation for success through the minimum access to three days of quality ECEC. The NRWC also highlights at the start of our submission that ECEC itself is a gendered construct which must be acknowledged in this Bill (Campbell, Smith & Alexander, 2017).

NRWC Response to Key Provisions of the Bill

1. Entitlement to ECEC:

We note the amendments to the Family Assistance Act in Schedule 1 of the Bill will impact the number of hours of CCS that families are entitled to receive per fortnight. We raise concerns that the entitlement will now be based on recognised activity, paid work, study, volunteering. This level of activity will directly correlate to the subsidised ECEC for all families. We highlight that these amendments and the terminology of "recognised activity" (such as paid work, study, and volunteering) disproportionately disadvantage women in RRR Australia, as it reinforces structural gender inequalities in both employment and caregiving responsibilities.

The NRWC suggests that this is a gendered issue because women bear the brunt of unpaid care work, particularly in RRR areas where access to ECEC as highlighted above forms part of the barriers to participation due to the 'desert' of ECEC, the lack of support services, and flexible employment is more limited. We believe that tying ECEC subsidies to formal employment or study fails to recognise the economic value of unpaid caregiving, further marginalising women who are disproportionately responsible for childcare. It also assumes women in RRR areas do not wish to engage in occupation or paid employment rather than addressing the system barriers to this.

Therefore, we wish to highlight the barriers to workforce participation in non-metro areas are often reflective of a complexity of dynamics, including a lack of access to stable employment due to fewer job opportunities, seasonal employment, lower workforce demand, and the dearth of ECEC enabling them to be available for employment. We see a big issue in the assumption made between the connection of ECEC with employment. Many jobs in these areas are casual, seasonal, or unpaid (e.g., farm labour, family businesses), meaning women may struggle to meet the "recognised activity" threshold to qualify for adequate CCS.

The entitlement to ECEC will we believe reinforce socioeconomic disparities for RRR women and we strongly suggest that the Bill must address and respond to reduce rather than support intersectional disadvantages (such as geographic isolation, socio-economic barriers, and gendered labour division) reinforce inequality (Cloney, Cleveland, Hattie & Tayler, 2016). Women in RRR areas already earn less than men, experience higher rates of underemployment, and have fewer education and training opportunities, further reducing their access to subsidised childcare (Kifle, Kler, & Shankar, 2019).

By linking ECEC subsidies to paid labour or study, this Bill will exclude women in precarious work situations or those needing to engage in unpaid caregiving. This creates a vicious cycle of economic disempowerment and a cycle of disadvantage where women cannot access affordable childcare, limiting their ability to work, which in turn reduces their eligibility for subsidies, trapping them in economic dependency.

In RRR communities, women frequently engage in unpaid community roles (e.g., school committees, emergency services, local health initiatives), but these are often not formally recognised as 'work' under subsidy guidelines. This reinforces patriarchal structures that undervalue women's contributions to their communities while failing to support them with essential services like ECEC (Coady, 2017).

From the NRWC's perspective, the Bill in its current form must account for and enable change to the dominant neoliberal ideologies that prioritise formal economic participation and juxtapose this with devaluing unpaid labour. Despite women being essential contributors to both economic productivity and social cohesion we must make their issues visible, like the perspective suggested by Kaplan, Sabbah-Karkabi, & Herzog (2020). We strongly suggest that our wonderful women in RRR areas who face daily systemic barriers to workforce participation must be provided with structures to support engagement, and participation in employment opportunities, if they choose this to enable reduction of economic marginalisation.

We highlight these issues with Leah's story.

Leah is a proud Wiradjuri woman and single mother of two young children, she lives in a remote community in southern NSW. She is deeply engaged in her community, volunteering at the local Aboriginal Health Service and supporting cultural education initiatives at the primary school. Despite her contributions, these roles do not meet the "recognised activity" requirements under the Family Assistance Act amendments, leaving her ineligible for adequate Child Care Subsidy (CCS). With no formal childcare services available within 100km, Leah must rely on family members for informal care, limiting her ability to pursue paid employment or further education. The rigid policy framework fails to acknowledge the intersectional barriers she faces—geographic isolation, racial and gendered economic marginalisation, and the systemic undervaluation of unpaid labour. Without affordable and accessible ECEC. Leah is locked in a cycle where lack of childcare restricts her employment opportunities, which in turn reduces her eligibility for CCS, reinforcing the very inequalities this policy should be addressing.

We suggest the linked suggestions of amendments to the Family Assistance Act, particularly those related to the Child Care Subsidy (CCS) entitlements that "recognised activities" such as paid work, study, or volunteering reinforce structural inequalities. The story shared by Leah, is one which is similar to many women. The ongoing policy landscape reinforces inequalities which disproportionately disadvantages women, like Leah, in RRR Australia. The Bill must be part of the solution, to empower women and their children. NRWC's call for organisations to work together to find ways to overcome the gendered division of labour by valuing the critical role of unpaid care work predominately undertaken by women, like Leah in their communities.

We continue to reinforce the basic issues that there is a lack of accessible childcare in RRR areas. This ongoing situation will continue to limit women's economic participation, reinforce gendered labour divisions and perpetuate economic vulnerability (Krakouer, Mitchell, Trevitt, & Kochanoff, 2017). Women in RRR communities often have limited access to secure employment, and the absence of affordable childcare services forces them into unpaid caregiving roles, widening the gender pay and employment gap. Therefore, in the NRWC's approach to ECEC highlights that workforce participation is not a choice, or privilege: it is a right. If RRR women are to achieve economic self-determination, they must have access to affordable and reliable childcare. The Three-Day Guarantee Bill 2025 must ensure that ECEC services in RRR Australia are structured to enable women's workforce engagement.

The NRWC advocates for:

- **Recognition of Unpaid Care Work as Productive Labour:** When assessing women in RRR areas for ECEC there must be provision for this labour. In doing so we must move beyond capitalist framings of 'work' and formally acknowledge caregiving and community contributions as legitimate economic activities that warrant CCS eligibility.
- **Equitable Access to ECEC:** Our insights is based on our vast networks of women who all believe that we must take a redistributive feminist approach whereby we must accept that

increased public investment in accessible, high-quality, and culturally appropriate ECEC services in non-metropolitan areas in a basic requirement to this Bill providing any difference to RRR women. Without this investment we limit its opportunity to make a difference to the lives of women and children in RRR. Without investment in the 'desert' of childcare the Bill will not change any of the dynamics of their lives.

- **Consider Location of ECEC:** Expand on-site childcare options for industries that predominantly employ RRR women, such as healthcare, education, and agriculture. A further suggestion would be to support community-based childcare initiatives that employ local women, providing both early education access and economic opportunities. This would deal with numerous of the already structural barriers that we have highlighted.
- **Intersectional Design of Assessment for ECEC:** Lastly, we suggest that eligibility frameworks must account for the complex realities of RRR women's lives, ensuring flexibility for those in non-standard work arrangements, seasonal labour, and community-based roles that may not fit rigid subsidy criteria. Therefore, there must be flexibility, knowledge and understanding of the variability and complexities of RRR life.
- **Addressing Shortage of ECEC Workers:** A further suggestion would be that alongside the Bill there could be development of incentive programs to attract and retain ECEC workers in RRR, including relocation bonuses, housing support, and professional development funding like suggestions by Smith, Hurst & Linden-Perlis (2023). These initiatives could provide funded training, wage subsidies, and flexible employment pathways for women particularly those facing systemic barriers to workforce participation to become qualified early childhood educators. By recognising childcare as both a critical workforce need and a pathway to economic empowerment, the Bill could incentivise local employment, increase childcare availability, and reduce reliance on external workforce migration. The NRWC suggests that this approach would align economic policy with gender equity goals, addressing both the childcare crisis and women's workforce participation in RRR areas.

2. Accessibility of ECEC

ECEC is fundamental to enabling equity in society and enabling the next generation to know and understand unconscious bias; to surface and reject the invisible patriarchy festering below curriculum in ECEC. Archer, (2024) is one of many globally which highlight the opportunity of the early years, we must not enable this to be squandered, the NRWC will shout, for this Bill to be part of a solution for RRR communities who are structurally disadvantaged to ECEC access. Many families face limited-service availability, long travel distances, and businesses in RRR areas have severe workforce shortages. We highlight that this disproportionately affects First Nations families and migrant communities in RRR. This issue is not just about location, it is about systemic exclusion from essential services. We believe that the government must take accountability, in part for this situation having implemented various policies to encourage migrants to settle in RRR areas, to address skill shortages and promote balanced population distribution. For instance, the *Regional Sponsored Migration Scheme (RSMS)*, allowed employers in designated regional areas to sponsor skilled workers for permanent residency with a government relocation payment. Furthermore, the 2023 Migration Strategy presented a new vision for Australia's migration system, including a policy roadmap with key actions and commitments for future reform. This strategy emphasises evaluating RRR migration to support development objectives in regional Australia and address skill shortages effectively.

However, this policy drive has failed to support the accompanied access to childcare in RRR Australia whereby there are significant disparities between metropolitan and non-metropolitan areas, with regional, rural, and remote communities facing notable challenges in availability and affordability. For instance, Hurley, Matthews and Pennicuik (2022) introduced the term 'Childcare Deserts' to explain the findings of their research which shows that approximately 1.1 million Australians reside in RRR

areas do not have access to ECEC. In these "childcare deserts," families need to be able, capable and have the means to travel considerable distances to access ECEC, if it is available at all.

In the last 12 months, Hurley and colleagues continue to highlight Service Gaps in RRR regions of Australia. They evidence the absence of childcare services in towns like Avoca in Victoria's Central Highlands. These locations have no available childcare places, therefore despite this Bill providing a provision for ECEC without infrastructure support, budget and funding it would continue to leave these families (and others like them in RRR areas) without local options (Hurley, Tham & Nguyen, 2024).

We provide an example of this situation:

In Orange, a town in regional NSW, there are approximately 44 ECEC. Orange is approximately 254 km west of Sydney, about a 3.5 to 4-hour drive. It provides a good example of a regional city with limited access to metropolitan-level services, including childcare and specialist healthcare. The average daily cost for childcare in Orange is approximately \$146.66. The area that was specifically targeted for migration and the diaspora of cultures is clearly visible in the community. However, specific data on the number of migrant families accessing ECEC in Orange is not readily available. This is despite efforts to attract migrants and focusing on growing and a diverse population. The influx of migrant families has increased demand for childcare services, leading to longer waiting lists and higher costs for families in Orange. We suggest with this example that the situation disproportionately affects migrant families, who face language barriers, have limited social networks, and financial constraints. These dynamics make it more challenging to secure and afford ECEC yet conversely make it essential for migrants to integrate into the community with their children.

The NRWC advocates for:

- **Equitable Access to ECEC in RRR Communities:** We suggested targeted investment to address the significant childcare service gaps in RRR areas, ensuring that all families particularly First Nations and migrant communities have access to affordable, high-quality early childhood education and care (ECEC).
- **Government Accountability for RRR Migration Policies:** Responsibility for the impact of policies encouraging migration to RRR areas without ensuring adequate childcare infrastructure, is essential for workforce participation and community integration.
- **Investment in Childcare and Infrastructure:** Funding to increase ECEC in RRR areas, including incentives for educators to work in these communities, to prevent "childcare deserts" that exclude families from essential services.

3. Affordability:

Cost is a major barrier for RRR families accessing ECEC. The financial burden is particularly high for low-income, First Nations, and single-parent families, reinforcing economic exclusion. The economic divide in childcare accessibility highlights structural inequities that disproportionately affect women, particularly those in non-traditional work sectors such as farming, seasonal employment, and community services. Research by Thorpe et al. (2022) shows that over 90% of families in RRR Australia show a significant increase in childcare costs in the preceding past three years, compared to the 86% reported by metropolitan families. This financial strain has led 88% of RRR families to either forgo or limit their children's attendance in early childhood education and care services; in the rare case that it is available.

This affordability barrier was further explored in 2024, by a similar research team who highlight that the high cost and limited availability of childcare in regional areas compel essential workers, such as nurses and teachers, to reduce their working hours or leave the workforce entirely. This situation

exacerbates existing workforce shortages and hampers economic growth in these communities (Tang, Rankin, Staton & Thorpe, 2024; Gina, 2024).

Jarna, a First Nations single mother in remote NT, juggles casual work while navigating unstable housing and rising living costs. She wants her two-year-old daughter, Kirra, to attend childcare so she can increase her work hours, but high fees and limited availability make it nearly impossible. Despite subsidies, the out-of-pocket costs consume nearly half her income, forcing her to rely on unreliable informal care. With the cost-of-living worsening, Jarna's can't access affordable and stable childcare which means she is stuck in a cycle of financial insecurity, and limited job opportunities. (CASPA, 2024)

The NRWC knows many women, like Jarna, who juggle each day, we thank Jarna who enables us to highlight for women to have true inclusion in RRR areas we must address affordability disparities, ensuring that RRR families have the same financial support structures as metro women and children. We strongly believe and advocate for every child to have the minimum suggested 3 days ECEC, we must ensure that no child misses ECEC due to financial barriers.

The NRWC advocates for:

- **Higher Childcare subsidies for remote families:** Implement higher childcare subsidies for RRR, remote, and low-income families, reflecting the unique financial burdens they face.
- **First Nations and migrant communities:** We would like to see the introduction of free ECEC services for First Nations and migrant communities facing systemic disadvantage.
- **Expand financial support mechanisms for informal childcare:** For rural and remote areas, particularly grandparent-led or community-based childcare, we would like to see an expansion of financial support arrangements for informal childcare.

4. Quality Disparities

Service Ratings: An analysis of Victorian childcare centres provides evidence for the NRWC's concern about ECEC failing to meet the National Quality Standards, particularly in RRR Australia. Graesser, Sore, Rogers, Cole, and Hegde, (2022) found a higher concentration of underperforming ECEC in lower socio-economic and RRR areas in comparison to inner-city ECEC. We, therefore, highlight the factors which contribute to the lower standards of ECEC in RRR were found by Christopher, Turner, and Green (2022) to be due to limited access to professional development, educator shortages, and fewer resources. We suggest that this creates challenges in delivering equitable standards of ECEC in RRR areas. In tandem with the Bill, we must consider how we target the right workforce mix in ECEC. This is an underlying imperative of the Bill which must include provisions to support and incentivise diversity in the workforce. We must train and encourage a diverse mix of workers in ECEC in RRR. When addressing workforce shortages, we must develop strategies to ensure culturally responsive care for diverse communities (Qi & Campbell, 2022). We suggest that these disparities highlight the need for targeted policy interventions to enhance the accessibility, affordability, and quality of ECEC in RRR.

In a regional town in Western Australia, one of the ECEC providers talks about the challenges of providing services due to a critical shortage of trained staff. The service is unable to meet National Quality Standards, forcing it to operate with minimal staff and reducing its intake capacity. Parents report long waitlists, with many unable to secure consistent care, directly impacting their ability to participate in the workforce. The centre struggles to provide professional development, as regional educators have fewer training opportunities and often cannot afford to travel for upskilling. This ECEC is not a one off, it reflects broader trends, with

documented evidence of nearly 40% of private for-profit childcare services failing to reach the national quality standard, compared to about 15% of government-run services. Many of these underperforming ECEC services are in lower socio-economic RRR areas, where workforce shortages exacerbate inequitable access. This case underscores the urgent need for targeted policy interventions within the Bill to ensure RRR communities receive workforce support, training incentives, and funding necessary to deliver high-quality, culturally responsive ECEC. Without immediate investment in workforce diversity and retention strategies, children in these communities will continue to experience systemic educational disadvantage.

Furthermore, using an equity lens we suggest that equitable access must address the underlying barriers to ensure that marginalised RRR communities have the same opportunities to quality childcare as suburban families. The Bill must include tailored solutions for RRR families, recognising that a one-size-fits-all approach reinforces educational and economic inequality and fails to provide interventions to lift the quality of ECEC in RRR Australia. Notwithstanding the opportunity that this Bill to create ECEC as a platform for future populations with less health issues and a potential for reducing societal inequalities (Lopez, Hegde, Whelan, Dashper, Tsakos, & Singh, 2023).

The NRWC advocates for:

- **Support sustainability of service:** We call for Increased targeted funding for RRR and First Nations ECEC services, ensuring long-term sustainability.
- **Place based community options:** We would like to see the development of options for RRR to engage with ECEC with flexibility and community-led programs to reach RRR communities.
- **Cultural appropriateness:** We call for embed culturally responsive education models, particularly for First Nations and linguistically diverse children, ensuring early learning is inclusive and relevant to their needs.

5. ECEC Access for Children with Disabilities in RRR

Access to specialised childcare services for children with disabilities in RRR is notably limited, presenting significant challenges for affected families. We highlight the need for the Bill to consider families in RRR who face difficulties accessing specialised childcare services due to factors such as limited-service availability, workforce shortages, and financial constraints. The Australian Human Rights Commission has noted that in some RRR communities, it is often not financially viable for operators to provide mainstream childcare services, let alone specialised services for children with disabilities.

It is imperative therefore to highlight the impact on children with disabilities who cannot be provided with essential ECEC services. The lack of accessible early learning and intervention services in these areas can exacerbate developmental vulnerabilities among children with disabilities (Olusanya, et al., 2022). Early intervention is crucial for addressing developmental delays and supporting children in reaching their full potential (Zabeli, & Gjelaj, 2020). Without access to these services, children may face greater obstacles in catching up and succeeding at school and beyond.

The scarcity of specialised childcare services places additional strain on families, particularly mothers, who often assume primary caregiving responsibilities. This perpetuates their ability to participate in the workforce, pursue educational opportunities, or engage in community activities, leading to financial challenges and social isolation. The unequal distribution of unpaid care work reinforces traditional gender roles and contributes to persistent gender inequalities in the labour market. The NDIS early intervention reforms theoretically aim to provide timely and targeted support for children with disabilities in RRR Australia, but as already highlighted in our submission, ECEC workforce

shortages, and geographic isolation limit access, exacerbating disparities in developmental outcomes.

Not accessing ECEC for children with disabilities creates the start of a lifetime of disadvantage which has long-lasting effects. Early intervention delivered through ECED has been shown to improve developmental outcomes and reduce the long-term impact of disability, enabling children to reach key developmental milestones and engage more effectively with their peers (D'Aprano, McRae, Dayton, Lloyd-Johnsen, & Gilroy, 2024). Without this support, children can experience delays in cognitive, emotional, and social development, which can affect their ability to succeed in school and interact in social settings, have an increased risk of mental health issues and behavioural problems due to the unmet need for early support and be less likely to participate in mainstream education or community activities, leading to further social isolation.

Case Study: Stacey – A Mother, Business Owner, and Disability Advocate Struggling in Rural NSW

Stacey, a single mother living in rural NSW, faces overwhelming challenges as she tries to provide for her five children. Four of her children, three are under school age have behavioural spectrum disorders. Stacey herself lives with a disability, making daily life even more complex. Despite this, she has built her own small business. She works tirelessly to create financial stability for her family. However, the recent floods devastated her town, damaging both her home and business. She now faces the daunting task of relocating her family while trying to sell her flood-affected business; a process complicated by property damage and a struggling local economy.

With no access to inclusive ECEC, Stacey's children miss out on vital early intervention support, leaving her stretched beyond capacity. The stress of managing their care, rebuilding her life, and keeping her business afloat is taking a toll on her physical and mental health. She feels isolated, unheard, and trapped in a system that fails to recognise the urgent need for accessible services in RRR.

For families like Stacey's, the lack of ECEC is not just an inconvenience - it is a crisis. Without affordable, inclusive ECEC in RRR and disaster-affected areas, mothers with disabilities will continue to struggle with impossible choices: caring for their children, earning a livelihood, or maintaining their own health. This Bill must prioritise funding for inclusive ECEC, disaster resilience in service provision, and targeted support for families in crisis to break the cycle of disadvantage. (CASPA, 2024)

The consequence for mothers like Stacey, is their ability versus their drive for economic dependences versus challenges to participation and productivity. All Stacey asks for is some generosity, the long-term economic impact on her children of not accessing appropriate ECEC is significant. Stacey offers her story not only for her, but also for other mothers and families in RRR. Unfortunately, Stacey's story is not unique, she represents countless rural women who are abandoned by policies that fail to account for the intersection of disability, gender, and geography. To address these issues and improve the accessibility of both ECEC and NDIS-funded early intervention services in RRR we suggest the following:

The NRWC advocates for:

1. **Recognition of the gendered burden of care:** Women, in RRR, bear the brunt of unpaid care work, exacerbated by structural barriers to ECEC and disability services. We suggest that policies must acknowledge caregiving as essential labour and ensure economic security for women forced to leave or reduce paid work due to inadequate services.

2. **Investment in rural workforce development:** We must address the chronic shortage of ECEC educators, disability specialists, and healthcare workers in rural areas by funding local training programs that prioritise women's workforce participation. We believe that by increasing wages and job security in feminised care professions, we would support a lift and recognise the systemic undervaluation of care work.
3. **Expansion of accessible and gender-responsive service models:** We believe that there must be an increase in funding for flexible ECEC options to reduce the emotional and financial burden on mothers who disproportionately shoulder caregiving responsibilities. Furthermore, we must ensure intersectional approaches are incorporated into the Bill which support First Nations women, migrant mothers, and single parents who face compounded structural disadvantages.
4. **Strengthened economic and social infrastructure for RRR women:** Therefore, we must provide targeted financial support for women-led businesses, particularly in disaster-affected regions, acknowledging how environmental crises disproportionately impact women's economic security.
5. **Paid caregiving allowances and flexible employment policies:** The Bill should enable mothers to remain in the workforce while supporting children with disabilities. An example would be for the Bill to utilise the model that is implemented voluntarily by Carers NSW - Carers + Employers program. This program accredits employers who implement flexible working arrangements for employees with caring responsibilities.
6. **Alignment of Bill with the NDIS reforms:** We suggest that both initiatives need to prioritise women and RRR families. We therefore advocate for simplification of application processes and reduction in bureaucratic barriers that disproportionately disadvantage women with disabilities and mothers of children with disabilities. We believe that if there is opportunity to support an expansion of NDIS-registered providers in RRR areas by offering incentives to female-led service providers and community-based organisations.
7. **Acknowledgement of the economic and social cost of inaction:** Failing to provide gender-equitable ECEC exacerbates the cycle of disadvantage, locking women out of economic participation and reinforcing intergenerational poverty. Without systemic change, women like Stacey, who is disabled, a mother, a business owner, and a flood victim will continue to face impossible choices between economic survival and caregiving.

In the next section we particularly address specific issues that relate to access to early intervention and ECEC for First Nations children in RRR, which is well documented as a greater issue, compounded by historical, social, and cultural factors. First Nations children often face greater barriers to accessing early ECEC, including those provided under the National Disability Insurance Scheme (NDIS). These challenges are rooted in the intersection of disability, geographical isolation, and the ongoing effects of colonisation, which create distinct barriers to service access for First Nations families.

6. ECEC for First Nations Families

We open this section of our submission, with a compelling case study of the importance of ECEC for First Nations families challenged by geographical isolation and infrastructure deficits. It is accepted that First Nations communities are often living in extremely remote areas where essential services, including ECEC and disability support, are either scarce or non-existent. Furthermore, there is a significant body of empirical evidence that ECEC can be a strategy to overcome intergenerational trauma (Tualaulelei & Halse, 2024; Lamb, 2020).

Case Study: Jaylen's Journey at Mogo Preschool

Jaylen, a three-year-old Dharawal and Yuin boy, attends Mogo Preschool on the South Coast of NSW. Mogo is a culturally embedded ECEC that fosters First Nations identity, community connection, and school readiness. His mother, Aunty Simone, a single parent who experienced intergenerational trauma and limited access to education, has struggled with stable employment due to the lack of childcare options in the region.

Mogo Preschool provides Jaylen with a culturally safe learning environment, where Yuin language, storytelling, and connection to Country are embedded in daily routines. Mogo supports both his cognitive, emotional, and cultural development. Through early intervention support available at the preschool, Jaylen receives speech therapy and social development programs, which would otherwise be inaccessible due to rural service shortages.

For Simone, access to childcare enables her to pursue vocational training in community services, breaking cycles of economic exclusion and limited workforce participation that have historically affected First Nations women, like her and her mob. By attending Mogo Preschool, Jaylen benefits from early learning experiences that in part, address the systemic educational disadvantages he and others like him face. His days at Mogo ECEC enable his mother time to undertake the learning required to develop economic and financial independence and support her community leadership.

Mogo Preschool, even with its limited funding, has engaged in service evaluations to evidence how it supports the community by acting as a hub for cultural revitalisation, social support, and economic participation. It ensures that First Nations children enter formal schooling with confidence, while empowering mothers like Simone to engage in education, employment, and leadership roles, fostering long-term, systemic change across generations. (Campbell Page, 2024)

Our vignette highlights that access to high-quality, culturally competent ECEC services is particularly crucial for First Nations children. We have also considered the needs of First Nations children with disabilities. We believe based on our networks that if provided with ECEC in a culturally safe and appropriate context, these moments provide a strong beginning to an education journey which can have a lasting positive impact on a child's cognitive, social, and emotional development. Evidence (for example, Martin, 2017) shows that culturally sensitive early learning programs lead to better outcomes for First Nations children, including:

- **Improved Developmental Outcomes:** Early intervention services can help address developmental delays or disabilities, providing the foundation for lifelong learning and wellbeing. With proper support, First Nations children are more likely to engage with education, build self-esteem, and succeed in later stages of learning.
- **Cultural Identity and Resilience:** Embedding First Nations culture, language, and traditions in early childhood education builds identity, resilience, and community connection. However, historical trauma, systemic racism, and cultural disadvantage have led to distrust and disengagement from mainstream services. To break these cycles of disadvantage, this Bill must ensure culturally safe ECEC, expanding services like Mogo to provide genuine inclusion and long-term impact.
- **Family and Community Strengthening:** ECEC programs that include family engagement and community input foster a holistic support system, like the Mogo Preschool we introduced earlier in our submission build stronger connections between children, families, and communities. The aspiration of these ECEC is to be part of the solution to helping to breaking the cycle of isolation and disadvantage.

- **Cultural Disconnect and Mistrust of Services:** First Nations families often experience a lack of cultural safety and competence within mainstream services, including ECEC providers. Many of these services are designed without considering the cultural needs of First Nations children and their families, leading to a sense of alienation and mistrust. For example, standard medical and educational approaches may not align with traditional First Nations knowledge systems or family structures.
- **Language Barriers:** If First Nations children speak First Nations languages as their first language, this may not be supported in mainstream ECEC programs. The lack of culturally and linguistically appropriate support in childcare and educational settings can hinder their access to ECEC and limit their developmental progress.
- **Educational Disengagement:** Without ECEC providing early intervention, children with disabilities may fall behind their peers in terms of cognitive, social, and emotional development. This early gap can widen over time, leading to disengagement from education and missed opportunities for personal and academic growth.

We suggest that the Bill is progressed, however we have great concerns about how equitable and inclusive access to ECEC, particularly for First Nations families in RRR can be provided. For this Bill to achieve its full potential, it must be explicitly designed through an equity framework with sufficient supply of places, on the peripheries where revenue generation is not the priority. The NRWC suggests that there must be diverse representation in the Bill to consequently enable equitable access to resources, and inclusive ECEC. The NRWC urges consideration of our recommendations and to work collaboratively with RRR communities to ensure that ECEC policies are designed with equity at their core.

Final Thoughts from the NRWC on the Bill:

Achieving gender equality in Australia requires us to shout loud to dismantle the systemic barriers that restrict women's workforce participation. The NRWC continues to highlight the myriads of barriers which are deeply entrenched in the lack of accessible, high-quality ECEC, particularly in RRR communities. ECEC is more than an educational tool; it is an economic and social justice mechanism that enables women to engage in paid work, pursue further education, and break free from cycles of unpaid caregiving that disproportionately limits their opportunities.

Yet, women in RRR Australia are often unseen; the NRWC is a vehicle who works tirelessly to render these invisible women in submissions, such as this Bill. We cannot fail to recognise RRR women's unique challenges in the Bill. They face impossible choices and yet they are the backbone of RRR Australia. The NRWC strongly recommends solutions for women, we cannot expect them to travel long distances to access ECEC – this is not viable. The burden of caregiving should not be compounded by geographic isolation. We must bring ECEC to them, not force them to uproot their lives to access ECEC. Investing in flexible models and including considering how mobile childcare, community-driven ECEC learning hubs, and co-located services within workplaces could help to ensure that ECEC is accessible, sustainable, and meets the diverse needs of RRR families. We must think outside the box and commit to a future where every child, no matter where they live has access to at least three days of high-quality ECEC per week. Anything less is an abandonment of gender equity and economic justice.

The NRWC wants consideration to be given to ECEC as a gendered practice; it is highly gendered, a profession dominated by women who are underpaid and undervalued. ECEC reflects broader societal attitudes toward caregiving as "women's work." The NRWC rejects these notions, which create a complex dynamic. The Bill must enable women working in ECEC to be recipients of a better system, to have access to the services they provide. We reinforce the economic precarity of a female-dominated workforce. Additionally, young girls attending ECEC should not see themselves, their

mothers, and female educators providing care only; this paradigm further entrenches gendered expectations of who is responsible for caregiving and domestic labour. Without disrupting these patterns, ECEC risks perpetuating the very gender inequalities it has the potential to dismantle.

The NRWC suggests that the Bill, in part, must reform ECEC and go beyond access and affordability. The Bill must challenge the patriarchal ideologies embedded in ECEC environments. The current ECEC curriculum must be critically examined and restructured to incorporate diversity, equity and inclusion principles. Zhou and Fenech (2022) amongst others argue for gender equity, empowerment, and the rejection of traditional, limiting gender roles which are embedded from the earliest years of educating and impact on the embedded beliefs of our future Australian leaders. Education is not neutral, and without intentional efforts to deconstruct unconscious biases, ECEC may continue to reinforce outdated power structures rather than disrupt them.

Furthermore, the Bill must go beyond surface-level commitments and actively confront the unconscious biases embedded in parliamentary processes that have historically deprioritised women's economic justice. Structural reform must be at the core, rejecting any policy or framework that fails to advance genuine equity. This Bill must enshrine a guarantee that all children in RRR areas receive at least three days of ECEC per week; this is the position of NRWC and must be passed without exception. Anything less is an admission that gender equity and economic participation for RRR women and their children remain secondary concerns in the national policy agenda.

Importantly, we have highlighted the needs of First Nations and migrant women, as well as their children, and the barriers they face in accessing ECEC. We have borne light in the voices of the women in our submission to the challenges faced by mothers and their children with disabilities, who require additional support and inclusive education models. These considerations must not be treated in isolation but dovetailed into this Bill and aligned with existing policies and legislation that seek to advance equity. A fragmented approach will only perpetuate systemic exclusion; investment in ECEC for RRR communities must be holistic, intersectional, and firmly embedded in a broader strategy for gender and social justice.

This is not simply about supporting working mothers, it is about making RRR women visible and giving them real choices. It is about dismantling entrenched systems of gender oppression that limit women's economic autonomy and perpetuate intergenerational cycles of inequality. Investing in ECEC is an investment in women's economic justice, children's lifelong success, and the prosperity of entire communities. If we are serious about achieving gender equality, we must ensure that access to quality ECEC is not just an option, but a fundamental right for all children and families in RRR Australia.

For further information:

Researched & written by:

Keli McDonald

Dr Melanie Bournell

ceo@nrwc.com.au

BH: 02 6742 6831

BH:0455 844 101

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