



ARACY Submission to the Productivity Commission's Draft Report: A path to universal early childhood education and care.

ARACY
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ARACY thanks the Productivity Commission for the opportunity to provide feedback on your draft report into Early Childhood Education and Care. ARACY has a long history of providing expert advice and participating in research for early childhood wellbeing, education, and care.



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Who We Are

ARACY - The Australian Research Alliance for Children and Youth is an independent, not-for-profit thought leader in all aspects of wellbeing for children and young people. It brings knowledge and people together to catalyse transformative change. ARACY uniquely links all areas of research, policy and practice associated with children's and young people's wellbeing. We strive to achieve this by advocating for evidence-based policy and practice, focusing on prevention and early intervention. Our consultations with over 4000 children and young people, their families, and experts have shown us what wellbeing means to them: to be loved, valued, and safe; to have material basics; to be physically and mentally healthy; to be learning; to be participating; and to have a positive sense of identity and culture. These six domains are reflected in ARACY's Nest - Australia's first evidence-based, wellbeing framework for children and young people.

We have been operating within this framework since 2013 and have progressed our work including publication of trackable indicators in our 5-year Report Cards and our most recent ARACY-UNICEF report *The Wellbeing of Australia's Children*, which incorporates both internationally comparable and Australian-specific indicators.

ARACY works across academic fields, across systems and across jurisdictions to influence decision-makers towards evidence-based action. is a well-established collaborator in identifying needs and pathways of reform for early childhood development, education policy and systems. ARACY is a partner of the *Thrive by Five* campaign and auspices the Thriving Queensland Kids Partnership, two initiatives striving to collaboratively address the needs of children and families in the early years. ARACY facilitates the Early Childhood Impact Alliance (ECIA), a group of philanthropic funders that invest in the early years. ECIA drives strategic investment, collective advocacy, and greater collaboration in the early years sector to develop pathways and projects to improve young children's wellbeing. In March 2020, ARACY hosted a National Early Years Summit, bringing together leading thinkers and change-makers to consider what a blueprint for young children's wellbeing would look like.

Overview

ECEC Investment will help end intergenerational disadvantage and give the next generations a great head start.

ARACY advocates for smart ECEC funding—better pay, incentives in needy areas, and support for vulnerable kids—to secure a thriving future.

Strategic investment in Early Childhood Education and Care (ECEC) is essential for national wellbeing, emphasizing improved pay and conditions to boost availability. ARACY supports incentives for ECEC workers in underserved areas and proposes community navigators to enhance access for vulnerable children. Funding targeted Early Years Programs in disadvantaged areas is crucial for laying a strong foundation for future generations.

Summary of Recommendations

- Participation in high quality ECEC is well-established to directly support long-term economic participation, reduce criminal behaviour in adulthood, and is a protective factor for most social determinants of health, in addition to supporting brain development in the first 2000 days and educational outcomes. Importantly, the benefits disproportionately affect children from vulnerable families, and is therefore a mechanism to interrupt intergenerational disadvantage. **Supporting a high-quality and accessible ECEC system should therefore be conceptualised as a wellbeing investment with benefits that cross generations and government portfolios.**
- The Productivity Commission should explicitly call for government investment in increased pay and conditions as a mechanism to increase ECEC availability.
- We support the Productivity Commission’s recommendation to increase the Child Care Subsidy rate to 100% for families with an annual income under \$80 000 and encourage the Productivity Commission to recommend a system of tapering which considers equitable access as a fundamental objective.
- We support the Productivity Commission’s recommendation to provide subsidised access to three days per week of ECEC from six weeks to school age, which should be considered an entitlement of the child and not of their parent or caregiver. We endorse the position of Goodstart that additional days should be available for children with vulnerability and to families to support workforce or other participation.
- Supply-side funding should be coupled with incentives for ECEC workers to take up work in rural or remote areas and other areas of persistent workforce shortage to strengthen workforce attraction and in areas of sparsity.
- Funding of intensive Early Years Education Programs in areas of extreme disadvantage is proven to improve outcomes for vulnerable children and national implementation should be considered.
- The National Centre for Vocational Educational Research collects rich data on VET students, including main reasons for discontinuation of study. The most recent VET Student Outcomes

Survey disaggregated by qualification type may provide valuable information on the decline in completion rates for ECEC qualifications.

- Community navigators may present an opportunity to increase participation in high quality ECEC for vulnerable children, but carefully monitored and evaluated implementation is needed to identify effective models.

Response

Information Request 2.2 - Cultural safety in ECEC services

- *What factors most effectively promote the provision of culturally safe ECEC?*
- *Should there be changes to the National Quality Framework to promote cultural safety and capability, beyond the updated learning frameworks?*

We point to proposals advocated by SNAICC to enhance availability of culturally safe ECEC services for First Nations children. These include calls for investing in local workforce attraction, retention, and qualification, particularly in regional rural and remote areas.

CEO of SNAICC, Catherine Liddle, made the following public statement in relation to National Quality Framework:

“We support the Productivity Commission’s draft recommendation for a new review of the National Quality Framework. SNAICC has long advocated for a framework that reflects Aboriginal and Torres Strait Islander cultural perspectives, knowledge, and expertise in ECEC service delivery.” (SNAICC, 2023)

We refer to SNAICC’s public response to the Productivity Commission’s Draft Report for further information:

[Aboriginal community-controlled organisations require a sustainable funding model recognising their knowledge and expertise: Productivity Commission](#)

Information Request 3.3 - Falling completion rates for early childhood teaching qualifications.

- *The Commission is seeking views on the factors that have led to a decline in completion rates of early childhood teaching qualifications.*

The National Centre for Vocational Education Research has recently released its VET Student Outcomes Survey (NCVER, 2023). This survey collects information on the main reasons for cessation of training among students. Unfortunately, the data was not disaggregated by qualification (i.e. it included students enrolled in courses outside early childhood education and care) and a request for information was not processed prior to the submission due date. We however point to this as a valuable source of information on the declining completion rates for ECEC qualifications.

- **Recommendation: Exploration of NCVER data from the most recent VET Student Outcomes Survey disaggregated by qualification type may provide valuable information on the decline in completion rates for ECEC qualifications.**

Information Request 5.1 - Low rates of expansion among not-for-profit providers

- *The Commission is seeking information about possible reasons why not-for-profit providers have not expanded to meet the growing demand for ECEC. What, if any, barriers and limitations do they face?*

We note and support the Productivity Commission's recommendation to provide additional support for persistently thin markets to improve availability and support universal access. We note particularly the recommendation to provide supply-side funding via grants, block-funding, competitive tendering, and specific funding for Aboriginal Community Controlled Organisations.

However, supply-side funding for infrastructure and running costs do not address the additional workforce shortages in 'childcare deserts', particularly in rural and remote areas, which may not improve sufficiently with improved pay and working conditions. We therefore recommend that:

We point to our earlier submission (ARACY, 2023) describing the growing gap between the quality and accessibility of services in the most and least disadvantaged areas of Australia. This is particularly pronounced in outer regional and remote/very remote areas where there can be more than three children for each childcare placement. More than 60% of outer regional, remote, and very remote Australia are in childcare deserts where there is extremely limited supply of childcare with approximately one million Australian children having no access to childcare at all.

Addressing this gap with support for infrastructure and running costs must be complemented with workforce incentives in to be effective. We therefore encourage the Productivity Commission to include an incentivising financial enabler for ECEC staff to work in outer regional, remote, and very remote Australia similar to incentives for teachers to work in these locations.

- **Recommendation: Supply-side funding be complemented with incentives for ECEC workers to take up work in rural or remote areas and other areas of persistent workforce shortage.**

Information Request 6.1 - Potential modifications to the activity test

The Commission is seeking views on the costs and benefits of options to modify the Child Care Subsidy activity test. Draft recommendation 6.2 would relax the activity test to allow all families to access up to 30 hours of subsidised care a week (60 hours per fortnight) regardless of activity, providing a step towards universal access. Options for the levels of activity that should be required for hours above 60 hours of subsidised care per fortnight could include:

- *Retaining the current activity test for hours of care over 60 hours per fortnight. This would allow 60 subsidised hours for all families, up to 72 hours of subsidised hours for families with 16 to 48 activity hours per fortnight, and up to 100 hours of subsidised care for those with more than 48 activity hours*
- *Simplifying the number of activity test tiers further by allowing 60 subsidised hours for all families and up to 100 subsidised hours for those with more than 48 activity hours*
- *Simplifying the number of activity test tiers by allowing 72 subsidised hours for all families and up to 100 subsidised hours for those with more than 48 activity hours.*

The introduction of a modified activity test could also be phased, for example, starting with lower income families, to allow time for supply to respond to increased demand and to evaluate the effects of the change before relaxing the activity test more widely. The Commission is seeking views on the

costs and benefits of a phased introduction, and which cohorts of families would benefit most from being able to access a relaxed activity test earlier.

ARACY supports Draft Recommendation 6.2 to allow 60 hours of subsidised care per fortnight regardless of activity levels and commends this recommendation on the positive effect this is likely to have on children from families with vulnerabilities.

Regarding access to subsidised care beyond 60 hours per fortnight, ARACY supports the model proposed by Goodstart where additional hours are provided any level of activity or for families with vulnerabilities (see Figure 1) (Goodstart, 2023). This supports child development as well as workforce or other participation.

3. All children should have an entitlement to subsidised access to three days per week of ECEC from six weeks to school age. Additional days should be available for families who need more to support workforce or other participation, or for children likely to experience vulnerability or disadvantage:
 - a. To ensure both child development and workforce participation objectives are met, and to minimise complexity, these daily sessions should be offered for a minimum of 10 and up to 12 hours per day to support families who need flexibility around long days and start and finish times.
 - b. The eligibility test and process to access the two additional days should be as simple as possible, with reference to an earned autonomy approach for providers. We recommend a one-off notification to Services Australia based on parental workforce participation and an annual notification by low-risk providers or pre-approved for children likely to experience vulnerability.
 - c. Children likely to experience vulnerability and eligible for additional hours should include children with the following characteristics aligned with the best evidence and supporting a targeted approach:
 - i. Children at risk of abuse or neglect
 - ii. Children from low-income families, including children from families where welfare payments are their primary income
 - iii. Aboriginal or Torres Strait Islander children
 - iv. Children with a disability or diagnosed condition
 - v. Children who are humanitarian entrants or from refugee families.
 - d. The child-based entitlement could be assigned to each child's Services Australia Customer Reference Number (CRN) and enshrined in legislation.
4. The activity test should be abolished.
 - a. Families who require more than three days of ECEC for work or study would need to demonstrate all parents have had work, training or study-related commitments at some time during a week or have an exemption. No minimum number of hours of activity would be required.

Figure 1: An excerpt from Goodstart's submission to the Productivity Commission Inquiry outlining their position on the activity test beyond 60 hours of care. This position is endorsed by ARACY (Goodstart, 2023).

- **Recommendation: We support the Productivity Commission's recommendation to provide subsidised access to three days per week of ECEC from six weeks to school age, which should be considered an entitlement of the child and not of their parent or caregiver. We endorse the position of Goodstart that additional days should be available for children with vulnerability and to families to support workforce or other participation.**

Information Request 6.2 - Child Care Subsidy taper rates

- *The Commission is seeking views on how Child Care Subsidy taper rates could be designed if the top rate of subsidy was increased to 100% of the hourly rate cap, as proposed in draft recommendation 6.2. This includes options to adjust taper rates for the Higher Child Care*

Subsidy, available to families with multiple children aged five or younger in ECEC who are eligible for a subsidy.

We support the Productivity Commission’s current recommendation to increase the Child Care Subsidy rate to 100% for families with an annual income under \$80 000. We encourage the Productivity Commission to recommend a system of tapering which retains equitable access of ECEC services.

Information Request 7.2 - System navigator roles in the ECEC sector

The Commission is seeking views from inquiry participants on ‘system navigator’ roles in the ECEC sector.

- Is there a need for national investment in system navigator roles? – If so, who would be best placed to perform these roles? Examples could include Inclusion Agencies or contracted delivery by a range of ECEC services, community organisations, local councils or ACCOs. – How could this be delivered across different groups of families (for example, regional or remote, Aboriginal and Torres Strait Islander and culturally and linguistically diverse families), including ensuring delivery in a culturally sensitive manner?

It has been suggested that the provision of community navigators for families with vulnerabilities is an important mechanism to ensure that all children are getting the best start to life (Centre for Policy Development, 2023). This has been proposed as an integrated, whole-of-family early childhood service delivery, that would include but not be limited to early childhood education and care system navigation. The purpose of system navigators would be to support families to “understand what local services and government supports are available, why they may be useful, and how to access them” (Centre for Policy Development, 2023). Anticipated benefits include “more consistent follow through on referrals and better connections with early intervention, health, and early learning services” (Centre for Policy Development, 2023). Regarding ECEC accessibility specifically, roles include support for families to overcome enrolment and access barriers and help to reduce the risk of debt due to subsidy access issues. Navigator roles are thus considered particularly important for families experiencing vulnerability or disadvantage. However, evidence on the effectiveness of community navigators is limited in part due to variable definitions and functions in different models (Telethon Kids Institute, 2020).

In terms of implementation, it has been suggested that system navigators should be embedded within existing systems (Centre for Policy Development, 2023). For example, existing universal service providers such as child and family health services could deliver additional navigation support with increased resourcing and training. This could involve broadening the scope and capacity professionals or engage individuals with relevant lived experience and community links (Telethon Kids Institute, 2020). Given the current sparsity of evidence closely monitored and evaluated trials would be needed to establish successful implementation.

- **Recommendation: System navigators could represent an important opportunity to support vulnerable families navigate complex systems surrounding early childhood development and increase participation in high quality early childhood education. This could be trialled through increased resourcing of existing systems.**

Information Request 9.2 An ECEC Commission

The Commission is seeking views on:

- What the scope of its functions should be

ARACY supports the development of an ECEC Commission. The scope of the proposed ECEC Commission should include system stewardship to improve coordination and accountability.

Additional Points

Key Point 1: Supporting a high-quality and accessible ECEC system should be conceptualised as a wellbeing investment with benefits that cross generations and government portfolios.

Although increased wages are likely to represent a significant investment, it is important to note the benefits of high quality ECEC for vulnerable families extend beyond educational outcomes. Early childhood development is considered a determinant of health by the World Health Organization (World Health Organization, n.d.), and early child education is recognised to influence not only school success, but also economic participation and social citizenship (Australian Institute of Family Studies, 2022).

Brain Development & The First 2000 Days

The impact of high-quality early childhood education on children's brain development is well established (Morgan, 2019). Ninety percent of brain development occurs in the first 2000 day of a child's life; the importance of this period on a child's overall life trajectory is significant (NSW Department of Health, 2019). For example, the NSW Department of Health First 2000 Days Framework notes that experience in the first 2000 days are (NSW Department of Health, 2019):

- strongly predictive of how a child will learn in primary school
- a predictor of pregnancy and involvement with the criminal justice system in adolescence
- linked to increased risk of drug and alcohol misuse
- linked to increased risk of antisocial and violent behaviour
- related to obesity, elevated blood pressure and depression in 20 to 40-year-olds
- predictive of coronary heart disease and diabetes in 40 to 60-year-olds
- related to premature ageing and memory loss in older age groups

Economic Participation & Crime

Multiple studies have indicated that participation in high quality early childhood education is associated with positive long-term outcomes, including (Morgan, 2019; García, Heckman, & Ziff, 2019)

- High school graduation rates, higher test scores, and number of years of education
- Adult employment and adult income
- Lower drug use and lower engagement in crime

Health

The World Health Organisation estimates that the social determinant of health account for 30-55% of health outcomes (World Health Organization, n.d.). There is strong evidence supporting participation in early childhood education as beneficial to specific social determinants including

income, education, employment, early childhood development, and social inclusion (Morgan, 2019; García, Heckman, & Ziff, 2019). It is very likely that this has indirect benefits to other social determinants, including working life conditions, food insecurity, housing, and basic amenities.

The social determinants of health as defined by the WHO are listed below; almost all are directly or indirectly benefited by participation in high quality ECEC (bolded):

- **Income** and social protection
 - **Education**
 - **Unemployment and job insecurity**
 - **Working life conditions**
 - **Food insecurity**
 - **Housing, basic amenities and the environment**
 - **Early childhood development**
 - **Social inclusion** and non-discrimination
 - Structural conflict
 - Access to affordable health services of decent quality.
- **Recommendation: Participation in high quality early childhood education and care is a powerful protective factor regarding the social determinants of health, and therefore represents an important investment beyond educational and academic outcomes and into population level health and the interruption of intergenerational disadvantage.**

Equity

Participation in high quality ECEC benefits children with vulnerabilities proportionately more than children from less vulnerable settings (Australian Institute of Family Studies, 2022). Research suggests that participation in high quality ECEC can buffer challenging family setting including chaotic households (Berry, et al., 2016) and maternal depression (Goelman, Zdaniuk, Boyce, Armstrong, & Essex, 2014), supporting brain development in children with vulnerable family settings.

- **Recommendation: Accessible, high-quality ECEC is considered a mechanism to support equity for children.**

ECEC and Wellbeing

ARACY commends the present government's focus on wellbeing and was an enthusiastic contributor to the recent Measuring What Matters consultation (Australian Government, 2023). Considering the evidence above, we note that investment in accessible, high quality ECEC aligns with many of the identified Measuring What Matters themes, including Healthy, Secure, Cohesive, and Prosperous, as well as the cross-cutting dimensions of equity, inclusion, and fairness.

Given the current government's emphasis on operating within a wellbeing framework (Australian Government, 2023), and the far-reaching, cross-sectoral benefits of ECEC including workforce participation (both immediate and intergenerational), health, social cohesion, and enhancing equity, a high-quality ECEC system should be a high priority for government across portfolios with a high probability of social and financial return on investment.

Commented [AV1]: _social_ return on investment?

Commented [KN2R1]: Social + financial return on investment! Preventative health interventions are generally highly cost effective, especially those which occur early in life (i.e. first 2000 days).

Key Point 2: Consider funding intensive Early Years Education Programs in areas of extreme disadvantage.

The [Early Years Education Program](#) (Tseng, et al., Changing the Life Trajectories of Australia's Most Vulnerable Children: Report No. 4 24 months in the Early Years Education Program: Assessment of the impact on children and their primary caregivers., 2019) trial and evaluation from University of Melbourne is an example of a high quality, targeted and purpose-built ECEC service aimed at redressing disadvantage. Children with significant vulnerabilities and risk factors aged under 36 months were enrolled in this program for 50 weeks per year for two years and received centre-based early years education and care. All children and families participating in the program had existing engagement with family and child protection services, and had two or more risk factors including family violence, parent alcohol and drug use, parent mental illness, attachment/relationship issues, harsh, inconsistent discipline and neglect or abuse (Tseng, et al., 2017)

Key features of the Early Years Education Program were high staff/child ratios, qualified and experienced staff, inclusion of an infant mental health consultant as a member of the team, and a rigorously developed curriculum. After 24 months, children who participated in this program significantly increased their IQ scores, resilience and protective factors and social-emotional development (Tseng, et al., Changing the Life Trajectories of Australia's Most Vulnerable Children: Report No. 4 24 months in the Early Years Education Program: Assessment of the impact on children and their primary caregivers., 2019). Parents and carers also reported decreased levels of distress. Intensive, wrap-around programs such as the Early Years Education Program are essential to provide the level of support needed to make significant change to the most vulnerable children.

Key Point 3: Explicitly call for government investment in increased pay and conditions as a mechanism to increase ECEC availability.

We applaud the Productivity Commission's recognition of the need to prioritise ECEC workforce attraction and retention to improved ECEC availability. This is particularly important given the recommendations to relax the activity test, increase childcare subsidies, and provide support for thin markets (DR 5.1 and 6.2) which the Productivity Commission's modelling indicates will increase ECEC use (Productivity Commission, 2023).

However, changes to the Fair Work Act do not guarantee adequate improvement to pay and working conditions for the ECEC workforce. Thus, we point to our earlier submission iterating the need to explicitly call for government investment to boost wages with the aim of reduce the wage gap between ECEC educators and primary school educators. It is our view that this will support retention of existing ECEC workforce and attract a greater workforce.

We note and support Draft Recommendations 3.1 to 3.7 as mechanisms to resolve workforce challenges. Additional supports to training and education pathways could include:

- a. Free TAFE courses
- b. Additional funding for traineeships for educators
- c. Expanding places in ECT ITE courses at universities, including scholarships
- d. Include early childhood teachers and educators on migration priority lists and address unnecessary hurdles and delays on visa applications

—ENDS—

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