

# **Submission to the Senate Education and Employment References Committee - Inquiry into the quality and safety of Australia's early childhood education and care system. The BubbaDesk Model.**

Inquiry into the quality and safety of Australia's early childhood education and care system

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**Lauren Perrett, Founder and CEO of BubbaDesk, would like to be called as a witness to give verbal evidence.**



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## 1. Executive Summary

### Why One-Size-Fits-All Childcare Fails — And Why Close-Proximity Models Are Essential

#### A Children-First System Cannot Be Uniform

Australia's childcare system is almost entirely built around traditional long daycare and family daycare, which are currently the only models eligible for the Child Care Subsidy (CCS). But for many families, these models are not viable — despite the subsidy.

Parents consistently tell us why:

- They are not ready to be separated from their baby in the first 1,000 days and want proximity.
- They are breastfeeding and need to be nearby to feed on demand (aligned with WHO guidance to breastfeed up to 24 months).
- They are concerned about transparency and safety, particularly following high-profile abuse cases.
- They require flexibility — but long daycare is rigid, full-day, and contract-bound.
- They find institutional environments unsuitable for very young infants.
- They view family daycare (care in a private home) as lacking routine visibility or oversight.

And alternatives? They're limited:

- Nannies are typically \$300+ per day, unsubsidised, dependent on a single carer, and introduce insurance and employment obligations.

The result is an economic penalty:

- 56% of women with children under 15 cite caring for children as their main barrier to working or working more hours.
- Only ~60% of mothers in couple families with a child under one are employed; just 29% for single mothers.
- Women work part-time at ~43% versus ~19% for men.
- Treasury analysis shows an additional \$5B in childcare subsidies could deliver \$11B in annual GDP.

## Where Traditional Childcare Models Break Down

1. **Relationship Disruption** - Mainstream centres are plagued by casualisation and high staff turnover, making it difficult for children to form consistent bonds. Different faces each day can leave children feeling unsafe and unsettled.
2. **Forced Separation** - Rigid, full-day models separate children from parents even when a child is visibly distressed. The structure often leaves no room for micro-reconnection during the day — no opportunity to breastfeed, settle or soothe.
3. **Institutional Scale and Design** - Multi-room facilities, hidden corners, and ratio averaging across the service reduce the ability of educators to maintain continuous, responsive relationships. Regulatory frameworks are built around large-scale models, not child-centred or attachment-sensitive principles.
4. **Parent Exclusion**- Parents are often entirely removed from the care environment for long stretches of the day. Yet research shows co-regulation — the moment-to-moment dance of responding to a baby's cues — is essential for emotional development. This can't happen from a distance.
5. **Inflexible, Ill-Fitting Regulation** - Existing regulations were designed around traditional daycare. They are ill-suited to small, parent-proximal models. Space requirements, operating definitions, and outdoor access mandates don't account for flexible, responsive alternatives like BubbaDesk.

## The Case for Diversity: Why Choice is Non-Negotiable

Children differ profoundly in temperament, development, and separation readiness. A system that mandates full separation — or provides no funded alternatives — imposes costs on families who cannot conform.

close proximity care (like BubbaDesk) fills this gap. It co-locates parent work/study space with structured, educator-led care for children, allowing:

- Breastfeeding on demand
- Settling or re-regulating when needed
- Continued co-regulation in the first 1,000 days
- Real-time visibility and accountability

This model reduces the “attachment tax” many families silently pay: giving up work, delaying study, or enduring emotional distress in pursuit of care options that feel safe and developmentally aligned.

### **close proximity care Is Aligned With Attachment Science — And De-Risks Care**

- **Responsive caregiving** is enabled through quick parental reconnection when needed.
- **Transparency and safety** are enhanced — parents are present, aware, and engaged.
- **Parental presence de-risks care** by embedding a natural layer of observation and accountability throughout the day. This significantly lowers the likelihood of neglect, misconduct, or distress going unnoticed — an ongoing concern raised in recent media around centre-based care.
- **Gradual separation** is supported. Children can explore independence while knowing their caregiver is near.
- **Breastfeeding and feeding rhythms** are respected without rigid scheduling.
- **Single-room, open designs** allow better observation and consistency.

This de-risking function of proximity-based models is under-recognised in current regulation. When parents remain nearby, they help safeguard the caregiving environment — not as intruders, but as informed, engaged partners in the child's day.

## **A System That Puts Children First Must Offer More Than One Model**

close proximity care does not aim to replace long daycare. It complements it. It serves families who cannot, should not, or do not wish to use full-day separation care — particularly during a child's most vulnerable early years.

What we need is regulatory and funding inclusion:

- **Funding parity:** Extend CCS eligibility to close-proximity childcare (co-working with onsite childminding).
- **A new national regulatory category:** Fit-for-purpose, co-designed with BubbaDesk, that embeds parent proximity as a safety feature; flexible outdoor compliance; strict 1:4 ratios; transparent single-room design; and higher hiring standards (age, psychometrics, lived parental experience).
- **State-based reform:** Reclassify services like BubbaDesk in Queensland from “adjunct care” to structured close proximity care.
- **Workforce improvements:** Sector-wide maturity thresholds, psychometric screening, and support for lived parental experience alongside qualifications.
- **Infrastructure support:** Grants to build and scale purpose-designed proximity care hubs.

In short, children deserve care that meets their needs — not care that forces them into systems designed for adult convenience.

close proximity care is not a niche; it is essential infrastructure for a diverse, modern, equitable childcare system that puts child development and secure attachment at its core.

## **3. Introducing BubbaDesk**



BubbaDesk is Australia's pioneering coworking with onsite ancillary childcare service. Providing families with close proximity and flexible care for children aged 0-3 years old. BubbaDesk has 8 spaces (as of Oct 2025) across NSW and ACT. Our point of difference: **Parents have to remain on site for the duration of care.**

Over 10,000 parents have registered interest to use our service date (across VIC, NSW, QLD, WA and ACT).

Canva, CommBank, Woolworths Group, SafetyCulture and many others have adopted BubbaDesk as an employee benefit. With some covering 100% of the fees on behalf of their employees.

"At Canva, we're incredibly excited about the possibilities brought to life by hybrid work. We offer our team the flexibility to work from a Canva campus, from home, or a bit of both; however, the balance works best for them and their teams. With partnerships like BubbaDesk, we're able to ensure the parents and caregivers in our team have the flexibility they need to build work around their lives, not the other way around." Rebecca Partridge, Canva Benefits Program Manager

"At SafetyCulture, we're committed to supporting our people through every life stage. Returning to work after parental leave is a critical transition, and parents often face the challenge of securing quality, reliable childcare that suits their individual circumstances. Partnering with BubbaDesk offers our CultureCrew a flexible, practical solution to ease this transition. It allows our team members to stay close to their children while working in a professional, well-equipped space - a win for both parents and businesses. This partnership helps us foster a more inclusive workplace and ensure our team members feel supported professionally and personally."

Hannah Croston, Head of People Experience

## 4. Comparative Analysis: BubbaDesk vs Traditional Childcare Models

The Australian childcare system is heavily weighted toward traditional long day care and family daycare models, both of which receive Child Care Subsidy (CCS). However, evidence and lived experience show that these models do not meet the needs of all families — particularly those with children under three and those seeking flexible, transparent, and attachment-supportive care.

BubbaDesk represents an innovative, safe, and family-responsive alternative. The table below sets out the critical differences.

Category	BubbaDesk	Traditional Daycare	Nanny at Home	Family Daycare
<b>Safety &amp; Transparency</b>	Parents are <b>onsite in coworking</b> and must <b>check in every 3 hours</b> . <b>Single-room design</b> ensures full visibility of all children. Multi-carer presence at all times. Parents have direct access to sleep/nappy areas and live cameras.	Parents drop off and leave. Little to no visibility during the day. Large group settings mean individual supervision can be diluted. Transparency issues raised following serious abuse cases in recent years.	Behind closed doors with no oversight. No natural accountability. Parents must rely solely on trust or install surveillance.	Conducted in private homes with no routine visibility. Parents rarely observe the environment in action. Isolation increases risk of misconduct going undetected.
<b>Capacity &amp; Ratios</b>	Capped at <b>17 children per day</b> in a single space. <b>Strict 4:1 ratio across all ages</b> . Ratios only count staff directly engaged with children.	Large centres (50–100+ children) across multiple rooms. Ratios vary by age (1:4 for infants up to 1:11 for preschoolers). <b>“Under the roof” loophole</b> allows ratios to be averaged across the service, leaving some rooms under-staffed.	One-to-one care, but only as good as the individual nanny’s attentiveness. No independent oversight.	Capped at 7 children (4 under school age), but with <b>only one adult</b> . If carer is distracted or unwell, there is no backup.



<b>Hiring &amp; Vetting</b>	<p><b>Direct hiring only (no agencies). No staff under 24. All-female team, many are mothers themselves.</b></p> <p>Rigorous three-stage interview (including founder), independent reference checks, and a <b>trial day with children</b> before hire.</p>	<p>Rely heavily on <b>agencies and casual staff</b> to fill rosters. Staff can be as young as <b>18 years old. Students in training are counted in ratios</b>, meaning children may be supervised by inexperienced carers. High turnover is endemic.</p>	<p>Families must conduct their own vetting. No consistent or regulated process. Experience and qualifications vary widely.</p>	<p>Registered through schemes, but vetting is minimal. Parents not directly involved in selection. Carer works alone.</p>
<b>Qualifications</b>	<p>Educators hold recognised early childhood qualifications, plus ongoing training in child protection, safe sleep, and emotional wellbeing.</p>	<p>Minimum is <b>Certificate III</b>, which can be obtained at 17–18. Inexperienced staff or students on placement are often included in ratios.</p>	<p>Qualifications optional. Some are highly skilled, but many have no training in early childhood care.</p>	<p>Certificate III minimum, but one carer is solely responsible for multiple children, limiting individual attention.</p>
<b>Continuity of Care</b>	<p>Team-based model means consistency even when staff are sick. Parents are present onsite, providing further continuity for the child.</p>	<p>High turnover and casualisation mean children often face unfamiliar carers. Agency staff used regularly.</p>	<p>Continuity if nanny stays long term. But if sick, quits, or unavailable, families are left without care.</p>	<p>Sole reliance on one carer. If absent, care ceases entirely.</p>

<b>Flexibility</b>	Daily bookings, with the option to swap/share between parents. No rigid contracts. Reflects modern workforce needs.	Locked into full-day bookings and long-term contracts. Minimal flexibility.	Maximum flexibility but prohibitively expensive for most families.	Some flexibility, but care is disrupted by carer's availability, illness, or personal leave.
<b>Environment &amp; Stimulation</b>	<b>Single-room, calm, sensory-aware</b> environment. Rich play-based curriculum and resources. Small groups ensure individual attention.	Large, institutional settings. May be overwhelming for very young infants. Structured schedules often override children's rhythms.	Limited to what's in the home environment unless nanny arranges outings. Risk of isolation from peers.	Dependent on carer's home setup. Typically fewer resources and limited peer diversity.
<b>Parent Wellbeing</b>	Parents remain <b>onsite at all times</b> , balancing productivity with proximity. Ability to breastfeed, bond, and respond reduces anxiety and supports secure attachment.	Full separation from child, which many parents are not ready for in the first 1,000 days. Increases stress for breastfeeding or attachment-focused families.	Parents may feel uncomfortable working from home while nanny is present. Blurred boundaries.	Parents separated with little transparency, often increasing worry.

<b>Insurance &amp; Liability</b>	BubbaDesk holds organisational insurance (public liability, workers' comp for staff). <b>Parents remain legally liable</b> for their child due to onsite model — providing added accountability and shared responsibility.	Covered under childcare regulations. Parents are not liable.	Parents are the employer and must arrange workers' comp and liability cover. Many do not, leaving families exposed.	Insurance via schemes, but liability rests heavily on the individual carer.
<b>Cost &amp; Value</b>	Mid-range daily cost. Coworking component often tax-deductible. Provides both childcare and productive workspace.	CCS eligible, but rigid and less suited for infants. Subsidy masks systemic rigidity.	\$300–\$400+ per day, with no subsidy. Unaffordable for most families.	CCS eligible and lower cost, but limited oversight and variable quality.

BubbaDesk only provides care for children up to the age of 3 years old. We support the model of preschool/ school ready programs through traditional means from 3 years and over.

## 5. Why a New Category Is Needed

BubbaDesk currently falls under the regulatory definition of “**adjunct care**” — the same category that applies to incidental care provided in gyms, shopping centres, or leisure facilities. This classification is inappropriate for a service like BubbaDesk and prevents families from accessing the Child Care Subsidy (CCS).

**BubbaDesk is not a crèche.**

- Gym crèches and similar services are designed as short-term, incidental care without structured programs, professional oversight, or ongoing developmental focus.
- They are not required to operate at strict ratios, or to employ qualified educators.
- They exist as a “nice-to-have” add-on, not as a reliable childcare solution.

**BubbaDesk is a professional, structured, attachment-supportive model of care.**

- **Small scale, safe ratios:** A maximum of 17 children per day in a single-room environment, with a strict 4:1 ratio across all ages.
- **Transparency:** Parents are onsite in coworking and must check in every three hours. All spaces are open, visible, and under constant supervision.
- **Qualified staff:** Educators are aged 24+, directly hired (no agencies), rigorously vetted, and many are mothers themselves. Each with Cert 3 or above qualifications.
- **Programmed care:** A play-based curriculum, safe sleep practices, and a strong focus on secure attachment and emotional wellbeing.
- **Accountability:** Multi-carer presence ensures children are never alone with a single adult, and parents remain legally liable as they are onsite.
- **Secure attachment:** Unlike most centres, which rarely hire for or train staff in attachment-sensitive practice, BubbaDesk embeds secure attachment and responsive caregiving into recruitment and ongoing training. This ensures children experience attuned care consistently, reducing the risks of misattunement that research shows can negatively affect attachment development and wellbeing.

**In short:** BubbaDesk meets — and in many areas exceeds — the safety, quality, and transparency benchmarks expected of formal childcare. It is not an incidental service, but a genuine alternative to long day care and family daycare.

## 6. Why This Matters for Policy

### 1. CCS Eligibility Is About Fairness

- A parent using long daycare for a 12-month-old receives CCS.
- A parent choosing BubbaDesk—**lower ratios, higher visibility, parent onsite**—receives **nothing**.
- This **inequity** penalises families for selecting a model better suited to infant development and parental proximity.

### 2. A New Category Protects Safety and Standards

- Leaving coworking+care inside “adjunct care” invites low-quality, incidental add-ons to proliferate.
- A **dedicated category** can enshrine: capped group sizes; strict 1:4 ratios; open visibility; **parent onsite**; rigorous hiring and screening.
- BubbaDesk, as the first mover, is well placed to co-design this framework and set a high-quality precedent.

### 3. Unlocking Scale Through Funding Parity

- CCS eligibility would enable models like BubbaDesk to scale into regional towns, suburban hubs, and corporate campuses — where demand for flexible, close proximity care is rising.
- This expansion supports both workforce participation (particularly for mothers of children under three) and child wellbeing (through attachment-sensitive care).

## 7. Education: Supporting Lifelong Learning, Professional Growth and Equity for Parents

BubbaDesk directly supports the Australian Government’s skills and training priorities. Through initiatives such as the National Skills Agreement and Fee-Free TAFE, there is a clear policy focus

on enabling adults - particularly women and parents - to retrain, upskill, or re-enter the workforce.

BubbaDesk's proximity-based model reduces one of the biggest barriers for parents of young children to access education and training, positioning the service not only as childcare, but also as an enabler of national skills and workforce participation goals.

### **Human Rights & Discrimination Context**

The barriers facing mothers are well-documented. The Australian Human Rights Commission's National Prevalence Survey (2014) found that almost one in two mothers (49%) reported experiencing workplace discrimination during pregnancy, parental leave, or on return to work. Of these, 18% were made redundant, had contracts not renewed, or were dismissed, while a further 32% resigned or looked for another job as a result.

More recently, the National Review into Work Conditions & Discrimination among Pregnant & Parent Workers in Australia (UniSA, 2023-24) confirms that these issues persist at scale:

- **89%** of respondents reported discrimination, disadvantage, or bias during pregnancy.
- **84.7%** reported such issues while on parental leave.
- **22.4%** were made redundant, had their contract not renewed, or were terminated during leave.
- **91.8%** experienced discrimination or bias on returning to work, with **45.1%** reporting fewer opportunities for promotion or advancement.

These findings highlight that traditional workplace structures and childcare arrangements continue to compound inequity for parents, especially mothers. While BubbaDesk is not the single solution to these systemic challenges, its proximity-based model creates conditions that support workplaces to avoid discriminatory practices - by reducing childcare barriers, easing re-entry, and enabling parents to remain engaged in education, training, and the workforce.

### **Lifelong Learning & Professional Training (Upskilling, Micro-credentials, Re-entry)**

- BubbaDesk enables parents of young children to engage in short courses, online learning, and professional re-entry programs, where traditional long-daycare models are often impractical.

- By reducing childcare barriers, BubbaDesk supports lifelong learning pathways that allow parents to continually update skills, retrain after career breaks, and access new growth industries.

## Government Priorities on Education & Training

- **National Skills Agreement (2024–2029):** Commits \$12.6 billion over five years to make vocational education and training more accessible, with a focus on priority groups such as women, parents returning to work, and disadvantaged cohorts.
- **Permanent Fee-Free TAFE (Free TAFE Act 2025):** From 2027, the Government has committed to funding 100,000 Fee-Free TAFE places annually, supporting equity cohorts including women, carers, and regional learners.
- **Additional 2025 Fee-Free Places:** The 2024–25 Budget allocated \$86.4 million for a further 20,000 Fee-Free TAFE and VET places from January 2025.
- **University Pathways Reform:** A new Managed Growth Funding System expands university places for students from underrepresented groups, alongside 8,600 fee-free Uni Ready pathway places to help more Australians transition into higher education.

## How BubbaDesk Aligns with These Priorities

1. **Enabling Parental Participation in Training & Upskilling**
  - On-site childcare integrated with study/work environments allows parents to attend courses or online study without the barriers of traditional daycare.
  - Supports federal goals of increasing workforce participation for women and parents, especially mothers re-entering the workforce.
2. **Supporting Fee-Free TAFE, VET Take-Up and University Pathways Reform**
  - BubbaDesk could partner with TAFEs, universities, and industry providers to deliver training and micro-credentials at hubs where parents access both learning facilities and childcare.
  - BubbaDesk directly supports **University Pathways Reform** by making these opportunities *accessible to parents of young children*, who are often excluded due to lack of flexible childcare. By embedding proximity-based care alongside study environments, BubbaDesk enables mothers and fathers to take up

university and bridging pathway opportunities without being forced to delay participation until children are older or more care options become available.

### 3. Reducing Structural Barriers

- The Productivity Commission and Treasury highlight childcare access and cost as major barriers to training and re-skilling. BubbaDesk's flexible, proximity-based model directly reduces these barriers.

### 4. Advancing Gender Equality & the Future Economy

- Women remain underrepresented in key growth industries such as technology, leadership and emerging sectors of the future economy. At the same time, national surveys show that pregnancy, parental leave, and return-to-work are still associated with high levels of workplace discrimination and reduced career opportunities for mothers. While BubbaDesk is not a standalone solution to these systemic challenges, it provides a practical model that reduces childcare as a barrier and creates conditions that support workplaces to uphold equity - enabling women and parents to participate more fully in education, training, and pathways into higher-demand industries.

## Why BubbaDesk is Different from Usual Daycare

Unlike traditional long-daycare, BubbaDesk is a proximity-based model where parents remain close to their children while studying, training, or working. This approach provides:

- **Flexibility:** Parents can participate in university study, TAFE, micro-credentials, or professional upskilling without being locked into rigid childcare arrangements. Traditional long-daycare typically requires set days and fixed enrolments, whereas BubbaDesk offers flexible options - including part-time and half-day access - making it easier for parents to align study and training commitments with childcare needs.
- **Accessibility:** BubbaDesk addresses the immediate barrier of childcare availability during the early years of childhood — a stage when many parents are otherwise excluded from study, training, or re-skilling opportunities due to limited or inflexible care options. Lack of access to supportive childcare not only limits participation in education and training but also contributes to the workplace discrimination many mothers experience during pregnancy, parental leave, and return-to-work transitions. By offering a proximity-based and flexible model, BubbaDesk creates conditions that help reduce these inequities.



- **Attachment-informed care:** Through the Secure Foundations Method, BubbaDesk ensures care is developmentally supportive and less stressful for parents of very young children.
- **Policy alignment:** Directly advances equity and diversity goals under the National Skills Agreement, Fee-Free TAFE, and university pathway reforms.

**Area for Consideration:** Proximity-based childcare models such as BubbaDesk can play a critical role in enabling parents - particularly mothers, who continue to face disproportionate barriers and workplace discrimination - to access education and training at all levels, including university study, vocational courses, and professional upskilling. By reducing access-to-care as one of the biggest barriers to participation, BubbaDesk directly supports government priorities to expand equitable participation in higher education and lifelong learning, and to strengthen workforce participation overall.

## 8. Our Recommendations - Detailed

Policymakers must deliver **more choices in childcare**. Families need safe, transparent, flexible options that allow for **close proximity between parent and child**.

**Coworking with onsite ancillary childcare** fills this gap. Especially with **40% of the workforce regularly working from home**, parents can work productively in a professional environment while their children receive play-based, high-quality care in an adjoining space. Parents are onsite and can check in anytime, combining attachment and safety with economic participation.

To achieve this, three policy shifts are essential:

1. **Funding Parity for close proximity Care** - close proximity models, such as coworking with onsite ancillary childminding, must be eligible for the Child Care Subsidy (CCS) on the same basis as traditional long day care and family daycare.

## Why This Matters

- **No New Funding Required — Just Parity**
  - CCS is already the government's central mechanism for supporting families with the cost of care.
  - Extending eligibility to innovative models like BubbaDesk does not require new streams of funding
- **Supporting Workforce Participation**
  - Parents of children under three, particularly mothers, are least likely to re-enter the workforce under current daycare frameworks.
  - BubbaDesk enables them to return sooner and more productively by balancing proximity with professional care.
  - Subsidy access would make this choice viable for more families, directly advancing the government's stated goals around women's workforce participation and productivity.
- **Expanding Access Beyond Metropolitan Centres**
  - **Funding unlocks growth into regional towns**, where traditional daycare centres are scarce, oversubscribed, or unsuitable for parents of very young children.
  - By embedding coworking with onsite care into regional hubs, more families can stay in — or return to — regional communities, supporting local economies and reducing the drain to cities.
- **Closing the Adjunct Care Gap**
  - BubbaDesk currently sits in the “adjunct care” category of childcare, and is therefore excluded from CCS eligibility.
  - This exclusion is outdated. Close proximity care models like BubbaDesk are not incidental add-ons (e.g. gym creches) — they are structured, professional

services designed to meet early childhood needs.

- Bringing them into the CCS framework ensures families choosing close proximity care are not penalised for selecting a model better aligned with their values and child's developmental stage.
2. **New Category, New Regulation - Coworking with onsite ancillary childminding is a new, innovative category of childcare.** It cannot be adequately regulated under existing daycare or family daycare frameworks, which are designed for very different environments. A dedicated regulatory stream is required, and BubbaDesk — as the first operator of this model in Australia — is ready to co-design this framework with government to ensure a high-quality precedent is established before the concept inevitably grows.

## Why This Matters

- **Safety and Transparency**

- Traditional frameworks allow practices such as the “under the roof” loophole, where ratios are averaged across a centre, leaving some rooms under-staffed. BubbaDesk’s model removes this risk: one single room, capped at 17 children, with a strict 4:1 ratio across all ages.
- Parents remain onsite at all times and are required to check in every three hours. This creates a unique dual-layer of safety: professional supervision plus immediate parental oversight.
- Environments are fully visible — no closed rooms, no isolated carers — making misconduct or neglect far less likely compared to models where children are behind closed doors.

- **Workforce Standards and Hiring**

- The sector is under strain from high turnover and reliance on agency staff and inexperienced students. BubbaDesk sets a higher bar: no staff under 24, all directly hired, many mothers themselves, and rigorously vetted through a multi-step process including a trial day with children.
- A regulatory stream specific to this model would ensure these higher standards are enshrined from the outset, preventing a race to the bottom as new operators

enter the space.

- **Responding to Demand**

- close proximity care within coworking or corporate environments is in growing demand, particularly among parents of children under three who are not ready for full separation.
- Without regulation, this demand risks being met by ad-hoc or poorly monitored services, repeating the mistakes of family daycare, which suffers from oversight gaps and isolation risks.

- **Opportunity for Australia to Lead**

- Establishing a clear, fit-for-purpose regulatory stream now will set Australia apart in proactively supporting modern families.
- This creates the conditions for safe scaling: corporates can adopt the model as part of workforce participation strategies, and parents can access flexible, attachment-sensitive care options without compromising on quality.

- **Alignment with National Priorities**

- Workforce participation, particularly for women with young children, is a stated government priority.
- Child safety, transparency, and secure attachment in the first 1,000 days are also national concerns.
- BubbaDesk's model supports both: enabling mothers and fathers to work productively while keeping children safe, nurtured, and closely connected.

### **3. State-Level Barriers: Queensland and Victoria**

#### **Queensland – Adjunct Care Restrictions**

Under current Queensland regulations, “adjunct care” is restricted to incidental services such as gym crèches, where care is provided only while a parent engages in short-term, **non-work**

activities (e.g. shopping or exercise). Care is capped at three hours per session and is not intended for structured, ongoing childcare.

**BubbaDesk does not fit this definition.**

- Care is purpose-built to support parents in on-site paid employment, not leisure.
- Parents often require half or full workdays, not incidental three-hour blocks.
- BubbaDesk employs qualified staff, enforces strict ratios (1:4 across all ages), and delivers a structured, developmentally appropriate program.

**Why change is needed:**

- Parental availability & oversight: Parents remain onsite and must check in with their child every three hours, providing a dual layer of accountability — professional supervision plus immediate parental proximity.
- Clarity on “sessions”: Current law is ambiguous. Reform should allow up to 8 hours per day through consecutive sessions, provided mandatory parent check-ins occur every three hours.
- Workforce participation: Many mothers of under-threes cannot or will not use traditional daycare due to breastfeeding, attachment needs, or safety concerns. BubbaDesk provides a bridge back to work.
- Fit-for-purpose regulation: Lumping BubbaDesk into “adjunct care” alongside gym crèches ignores its structured, professional, and economically significant role.

**Victoria – Limited Hours Services Restrictions**

In Victoria, BubbaDesk currently falls under the “Limited Hours Services” category, which is similarly ill-suited to structured close proximity childcare. These services are bound by outdated requirements, including (for Type 2 Limited Hours specifically):

- Outdoor space mandate: Minimum 7m<sup>2</sup> per child, designed for large early learning centres, not small-scale coworking hubs.

- Daily cap: Care limited to 5 hours per day, and up to 15 hours per week, which fails to support parents needing standard half or full workdays.

#### **Why change is needed:**

- Outdated standards: The outdoor requirement does not reflect the low-risk, proximity-based model, where parents are present and can take children outside for breaks.
- Inflexible hours: Restricting to 5 hours undermines workforce participation. Expanding to 8 hours per day would align with modern work patterns while still safeguarding children's wellbeing.
- Risk profile mismatch: The law assumes full parental separation. BubbaDesk embeds parental presence as a safeguard, materially reducing risk and warranting a differentiated regulatory approach.

#### **The Case for Reform Across Jurisdictions**

Both Queensland and Victoria are inadvertently stifling innovation through regulations designed for outdated care categories:

- Queensland lumps BubbaDesk into adjunct/incidental care, capping sessions at 3 hours and prohibiting use while parents are engaged in paid work.
- Victoria forces it under Limited Hours Services (Type 2), imposing 5-hour daily caps and outdoor space requirements designed for large centres.

Neither reflects reality. BubbaDesk is not incidental, nor is it limited-hours crèche care. It is a structured, professional, attachment-supportive model designed to enable parents to remain close while re-engaging in paid work.

#### **Recommendation**

We urge both Queensland and Victoria governments to:

1. Reclassify coworking with onsite ancillary childminding into a fit-for-purpose category separate from incidental/limited-hours services - Close proximity care.
2. Clarify sessional rules in Queensland:
  - a. Allow parents to access up to 8 hours per day through consecutive sessions, with mandatory 3-hour parent check-ins.
  - b. Amend restrictions so that services can explicitly be used while parents are engaged in paid work — reflecting the primary purpose of coworking childcare, which is to enable workforce participation, not leisure.
3. Expand session caps in Victoria: extend from 5 to 8 hours per day to enable meaningful workforce participation.
4. Introduce flexibility in outdoor space requirements, allowing indoor alternatives or waivers where parents provide outdoor breaks.
5. Recognise parental presence as a structural safety mechanism that lowers risk profiles compared to traditional models.

By modernising legislation, both states can ensure parents are not penalised for choosing a transparent, safe, and flexible model that better reflects modern work and caregiving realities.

## 9. Alignment with Government Frameworks and Funding

### How BubbaDesk Delivers on National Priorities

BubbaDesk's model of coworking with onsite childcare directly supports the Australian Government's vision for early childhood education and care. By embedding proximity care, transparent practice, and flexible family support, BubbaDesk advances the Early Years Strategy 2024–34, the Outcomes Framework, the First Action Plan 2024–27, and the priorities in the 2025–26 Federal Budget.

Yet, despite this alignment, BubbaDesk is currently ineligible for subsidies and grants due to its non-traditional structure — a policy contradiction that undermines the very outcomes government has committed to achieve.

#### 1. Early Years Strategy 2024–34

The Strategy sets the vision that all children “thrive in their early years, nurtured by empowered and connected families who are supported by strong communities”.

BubbaDesk operationalises this vision by:

- Empowered Families – Parents stay connected to their infants in the first 1,000 days, supporting attachment and parental confidence.
- Strong Communities – BubbaDesk hubs act as local micro-communities, reducing isolation and building peer networks.
- Integrated Care – By colocating care with work, BubbaDesk addresses system fragmentation and makes childcare more accessible.

This directly supports the Strategy's priority focus areas: valuing the early years, empowering families, supporting communities, and strengthening coordination.

## **2. Early Years Outcomes Framework**

The Framework identifies eight outcomes that matter most for child and family wellbeing. BubbaDesk contributes to:

- Outcome 1: Children are nurtured and safe – Secure caregiver-child relationships are enabled through daily proximity and micro-reconnections.
- Outcome 2: Children are socially, emotionally, physically and mentally healthy – Reduced parental stress improves child socioemotional wellbeing.
- Outcome 3: Children are learning – Educators deliver play-based learning while parents reinforce this informally throughout the day.
- Outcome 5: Children have opportunities to play and imagine – BubbaDesk environments are designed for exploration and creativity.
- Outcome 7: Families are empowered, connected and supported – Parents gain agency, confidence, and access to supportive networks.



- Outcome 8: Communities are strong and inclusive – Hubs provide a focal point for families to work, learn, and connect.

### 3. First Action Plan 2024–27

The First Action Plan prioritises the first three years as **critical for attachment** and **brain development**, with a focus on safe environments, parental responsiveness, wraparound services, and innovation.

BubbaDesk delivers on these priorities by:

- Attachment and Brain Development – Maintaining parent-child proximity in the first 1,000 days.
- Protective Environments – Transparent, open settings strengthen safeguarding compared to closed-door family daycare.
- Wraparound Support – Integration with maternal health and mental health services, e.g., partnerships with Gidget Foundation.
- Access in Underserved Areas – Hubs can expand to outer suburbs and regions targeted by capital grants.
- Innovation – BubbaDesk is the flagship model bridging home, work, and care.

### 4. Secure Attachment: BubbaDesk's Core Contribution

Secure attachment is the foundation of child wellbeing, underpinning resilience, learning, and long-term health. National frameworks explicitly prioritise this:

- Outcomes Framework – Outcome 1: secure caregiver-child relationships.
- First Action Plan: first three years as a critical window for attachment.

BubbaDesk uniquely embeds secure attachment into daily practice:

Observed Practices



- Parents nearby → natural micro-exchanges (soothing, play, reconnection).
- Dedicated breastfeeding and sleep rooms → respect for rhythms of child and caregiver.
- Co-working model lowers stress → improves parental availability.

BubbaDesk sets a higher benchmark than industry standard by explicitly training staff in secure attachment and responsive caregiving. Most centres meet minimum qualification requirements but do not prioritise attachment-focused practice, leaving children at greater risk of misattuned care. BubbaDesk's approach ensures that Outcome 1 of the EYOF — children are nurtured and safe through secure caregiver relationships — is more effectively met.

Structured Procedures (The BubbaDesk Secure Foundations Method)

- *Proximity Reconnection Protocol*: Scheduled reconnection opportunities.
- *Responsive Routines Framework*: Codified standards in staff training and handbooks.
- *Parental Wellbeing Integration*: Parent support treated as a child outcome, with perinatal mental health services embedded.
- *Measurement*: Tools such as Attachment Q-Sort and parental stress surveys, validated by psychologists (e.g., Macquarie University partnerships).

With 1 in 5 mothers and 1 in 10 fathers experiencing perinatal distress, BubbaDesk provides an environment that reduces stress and protects attachment at the very moment it matters most.

## 5. Federal Budget 2025–26

The 2025–26 Budget recognised ECEC as a national productivity lever, with major investments:

- \$1b Building Early Education Fund – BubbaDesk expansion in underserved areas aligns directly.
- \$529.6m Regional Capital Grants – BubbaDesk is scalable in outer suburbs at lower per-place cost.

- \$426.6m “3 Day Guarantee” – BubbaDesk provides exactly this model for hybrid-working families.
- \$3.6b Educator Wage Increases – Stabilises BubbaDesk’s educator workforce.
- \$10.4m Service Delivery Price Model – BubbaDesk provides unique cost data for flexible infant care.
- \$500m Commonwealth-Owned Centres – BubbaDesk is ready to pilot proximity care in this portfolio.

## 6. The Funding Gap

Despite this alignment, BubbaDesk is excluded from subsidies and grants because it falls outside the traditional “long day care” category. This exclusion undermines the outcomes government is investing billions to achieve.

Policy Ask:

1. Expand subsidy eligibility to innovative models meeting quality and safety standards.
2. Open capital grants to flexible models like BubbaDesk.
3. Pilot BubbaDesk hubs in Commonwealth-owned centres.
4. Include BubbaDesk in Service Delivery Price Model trials.

## 10. Conclusion

Parents need **real choice** in childcare. Long daycare and family daycare work for many—but **not for parents of infants who need proximity, transparency, and flexibility**. Many families may choose long daycare **later (around age 3+)**, when children can voice concerns and handle separation more confidently. Until then, an **evidence-based** alternative is essential.

**Close proximity childcare** delivers this: safe, transparent, flexible care that supports secure attachment **and** workforce participation. It cannot be retrofitted into existing regulation, and should **not** be excluded from CCS.

The ask is simple and urgent:

- **Fund it fairly (CCS parity).**
- **Regulate it properly (new category).**
- **Fix state misclassification (QLD reclassification).**

BubbaDesk stands ready to **partner with government** to co-design a world-leading framework so this new category grows on a foundation of **quality, safety, and equity**.

## 11. Statements From BubbaDesk Team

### Practitioner Evidence - From Laura Drummond, BubbaDesk Erina Educator

As an early childhood educator with a Bachelor of Education and an Associate Diploma in Social Science (Child Studies), I have worked across a range of early childhood settings. BubbaDesk offers something truly unique within the Australian childcare landscape — a model that supports both parents and children in the earliest years, in ways that traditional long day care cannot.

At BubbaDesk, children benefit from the presence of their parent while engaging in age-appropriate educational experiences guided by qualified educators. This proximity allows **secure attachment** to be nurtured during the crucial first 1,000 days, while also supporting developmental milestones through play, exploration, and socialisation.

Unlike traditional settings, BubbaDesk allows educators and parents to co-design flexible routines that reflect the child's home rhythm. This partnership ensures every child feels secure, understood, and supported — reinforcing the government's recognition that caregiver relationships are the foundation of child wellbeing.

BubbaDesk's proximity-based model supports **maternal mental health** and child wellbeing. Mothers can breastfeed throughout the day, parents can share meals with their children, and families have the reassurance of checking in whenever needed. This reduces stress and separation anxiety, easing the transition back to work while safeguarding parent-child connection.

The co-working hub also builds a **community of support among parents**, reducing isolation and creating informal networks that strengthen resilience.

BubbaDesk acts as a **stepping stone between home and long day care**. Children gain group learning experiences with educators and peers, while maintaining the comfort of parental proximity. This gradual exposure builds resilience and makes future transitions smoother and less stressful for children and families.

Parents at BubbaDesk enjoy **unprecedented transparency**. Cameras in cot rooms provide reassurance, and the open design means parents can drop in at any time. This visibility fosters trust and confidence, while reinforcing parents' roles as their child's first teacher.

BubbaDesk enables parents — particularly mothers of infants and toddlers — to **re-enter the workforce at their own pace**, balancing professional commitments with caregiving. This flexibility aligns directly with government priorities for women's economic equality and workforce participation.

Unlike isolated care models such as nannies or in-home services, BubbaDesk combines the safeguards of a **licensed early childhood setting** with **continuous parental oversight**. This dual accountability strengthens trust, transparency, and child safety.

From an educator's perspective, BubbaDesk is more than a workplace with childcare — it is a **secure, child-first community** where families, educators, and children thrive together. Infants and toddlers receive individualised care and rich learning opportunities, while parents benefit from reduced stress, strengthened confidence, and the ability to remain active in the workforce.

Extending the **Child Care Subsidy** to families using BubbaDesk would ensure that this **attachment-secure, family-integrated model** is accessible to more Australians. BubbaDesk does not replace traditional care, but complements it — filling a critical gap in the earliest years and delivering measurable outcomes for children, parents, and the wider community.

***Laura Drummond, holds Bachelor of Teaching (Early Childhood), and 27 years experience working in as a Early Childhood Teacher in traditional childcare centres***

### **Practitioner Evidence - From Dianna Borgese BubbaDesk Neutral Bay Educator**

Working at BubbaDesk, I see every day how close proximity care transforms children's experiences compared to traditional childcare. Small groups mean we can truly focus on each

child, tailoring care and learning to their unique needs. The environment fosters feelings of being valued and understood, which in turn builds confidence and reduces anxiety.

One of my favourite examples is a child who, at first, arrived clinging tightly to their parent, anxious and hesitant to engage. Over time, with the security of their parent nearby and the encouragement of our team, I've watched that same child stride confidently into the space with a big smile, running ahead to greet peers and initiating play. They now approach us eagerly to chat or join in a game of catch — a transformation that shows how much confidence and trust can grow in this environment.

The presence of parents onsite is fundamental to this success. It allows for timely, responsive care: children are never left distressed for long, as parents can step in alongside educators. This also reduces parental stress and anxiety, which directly benefits children. The model provides a gentler transition into care, with parents able to continue being part of caregiving routines, such as feeding or settling, while still re-engaging in work. This proximity fosters strong bonds, trust, and a sense of security for both children and families.

BubbaDesk is also built around transparency and safety. With one main play area, no blind spots, and parents able to enter the space at any time, accountability is embedded into daily practice. Parents can see the care and interactions firsthand, which creates a culture of openness. Staff, too, are held to high standards, with no opportunity for negative or unsupported behaviours to occur unseen. Routines such as toilet training involve parents directly, further safeguarding children.

From an educator's perspective, this model is also refreshing to work in. Unlike traditional childcare, where staff can be overwhelmed by paperwork and checklists, at BubbaDesk our focus stays firmly on the children. Communication with parents is immediate and natural, often allowing them to witness special learning moments for themselves. Sharing responsibilities equally across the team reduces burnout and turnover, improving job satisfaction and continuity of care.

In today's workforce, flexibility is essential, and BubbaDesk meets that need. Parents can book casually, choose half-days, and avoid paying for care they don't use. They also benefit from the coworking environment, where they can connect with other parents, share experiences, and feel supported. Importantly, parents don't have to sacrifice their attachment to their child — they can continue breastfeeding, maintain caregiving routines, and be truly present, while still contributing to the workforce.

In light of recent concerns about safety and transparency in traditional childcare, the BubbaDesk model provides reassurance and peace of mind. Parents know their child is safe, nurtured, and supported in a transparent environment, with them close at hand. It is a model that builds both

confidence in children and trust in families, while offering educators a safe, collaborative, and fulfilling place to work.

***Dianna Borgese, holds Bachelor of Teaching (Early Childhood), and 26 years experience working in as a Early Childhood Teacher in traditional childcare centres***

### **Practitioner Evidence - From Cathryn Sissions, BubbaDesk Erina Educator**

As an Early Childhood Educator, I have seen first-hand how BubbaDesk provides a gentler, more individualised adjustment for both children and parents compared to traditional childcare. The model supports unique routines, fosters a secure environment, and allows families to transition into care and back into the workforce in a way that feels supportive and natural.

At BubbaDesk, play-based learning is at the heart of our program. Educators carefully plan experiences around children's interests and abilities, which helps them transition with ease and feel secure. This smaller, more personal environment fosters trusting relationships between carers and children, and provides a "home away from home" that many families seek in the first 1,000 days. Parents, particularly those wishing to continue breastfeeding, find comfort in the close proximity of care and the ability to remain actively involved in their child's daily routines.

The presence of parents onsite is a cornerstone of the BubbaDesk model. This close proximity strengthens the Parent–Carer–Child relationship and ensures that children feel safe, supported, and confident. Parents often express how much they value being able to "pop in" for a cuddle or a moment of play, and children quickly come to look forward to these interactions. Knowing that parents are nearby reduces anxiety for both families and children, creating a positive atmosphere that nurtures secure attachment and trust.

BubbaDesk is also a highly transparent model of care. Parents can enter the play space at any time, access sleep room monitors, and remain connected throughout the day via our app and direct conversations with educators. This visibility ensures constant accountability, builds confidence in the quality of care, and promotes a culture of openness that is rare in traditional early learning settings.

Working in this environment is markedly different from traditional childcare. Staff are supported in a collaborative, professional, and relaxed atmosphere where the focus is firmly on children rather than excessive administrative tasks. This allows educators to dedicate their time to meaningful interactions and learning experiences. Children benefit from routines tailored to their developmental needs, secure bonds with trusted educators, and smaller group environments that foster confidence, friendships, and social-emotional growth.

In every respect, BubbaDesk provides a safe, positive, and supportive environment that benefits children, parents, and educators alike. It reflects the needs of today's workforce while safeguarding the developmental outcomes of the youngest members of our community.

***Cathryn Sissons, holds Bachelor of Teaching (Early Childhood), and 35 years experience working in as a Early Childhood Teacher in traditional childcare centres***

### **Practitioner Evidence - From Kaitee Morales, BubbaDesk Canberra Educator**

The first three years of a child's life are critical to their overall development, and the BubbaDesk model provides a safe, nurturing environment that truly honours this stage. Small groups and flexible routines mean children receive consistent, responsive care that builds their confidence, self-esteem, and independence. Unlike larger, more institutional settings, children here feel secure and valued, able to learn and play at their own pace while maintaining daily connection with their families.

I see children thrive emotionally and socially in this environment. Secure attachments are built quickly with familiar educators, and even on their first day, children often call us by name or seek us out for comfort. Older children enjoy helping younger babies, building empathy and leadership skills, while younger ones gain confidence from this mixed-age community. Many children take ownership of the space—asking us to message their parents for a cuddle or proudly deciding what they want to do next. These are powerful signs of belonging and trust that traditional models often overlook.

Having parents onsite adds another layer of consistency and security. If a child is unsettled, a parent can step in within minutes, helping them to regulate and feel safe again. This responsiveness reinforces secure attachment, predictable care, and a sense of calm that allows children to flourish. Parents frequently tell us how much it reduces their stress to know they can see their child throughout the day, and that reassurance flows directly into the child's sense of wellbeing.

Safety and transparency are also embedded in the BubbaDesk model. With strict low ratios, the same familiar educators each week, and a completely open-plan design with no blind spots, children are always under active supervision. Our recruitment process ensures high-quality educators who work in close partnership with families, creating a culture of trust, accountability, and shared responsibility. Parents have full visibility at all times, knowing their children are receiving the highest standard of care.



Working in this model is vastly different from traditional childcare. Educators aren't weighed down by excessive paperwork or stretched across large groups, which means we can focus entirely on meaningful relationships, quality play, and active engagement with the children. Families benefit from clear, ongoing communication and flexibility with days and times, while educators experience greater job satisfaction and less burnout. This translates directly into better outcomes for children.

For policymakers, the need for models like BubbaDesk is clear. Returning to work is often overwhelming for families, and traditional daycare does not meet everyone's needs. Parents want more choice—care that is flexible, affordable, transparent, and supportive of breastfeeding, attachment, and mental wellbeing. Close proximity care eases the emotional strain of separation, empowers parents to re-enter the workforce earlier and with confidence, and ensures children receive the nurturing, responsive care they need in their most formative years.

***Kaitee Morales, holds Diploma in Children's Services, and 18 years experience working in as a Early Childhood Teacher in traditional childcare centres***

### **Practitioner Evidence - From Kylie Macey, BubbaDesk Head of Staff & Operations**

The BubbaDesk model provides children with a gentler and more secure start to care than traditional childcare settings. One of the greatest benefits is the ability to bring parents in if a child is distressed for an extended period. This creates a safe and supported approach to separation—children begin to develop independence while always feeling reassured that their parent is close by. Small groups, typically 8–16 children per day, ensure individual attention, reduce overstimulation, and provide meaningful learning opportunities tailored to each child's interests. Our play-based, child-led approach allows children to explore at their own pace, building confidence, curiosity, and independence.

I have seen this make a profound difference for children and their families. Many arrive with strong separation anxiety, clinging tightly to their parents. With parents nearby, they can gradually build trust by watching how we interact with them. Within weeks, those same children transform—moving from hesitant and unsure to curious, happy, and socially engaged. I also love seeing the joy when a child spots their parent visiting for a quick cuddle or feed during the day; it's a natural, healthy release of emotion that fosters secure attachment.

The presence of parents onsite is central to children's emotional wellbeing. It allows for responsive, sensitive care, where children are supported both by educators and their parents throughout the day. Parents often continue breastfeeding during work hours, which strengthens attachment while also reducing the frequency of illnesses common in traditional childcare

settings. This model gives families peace of mind and children a strong foundation of trust and security.

BubbaDesk is also a highly transparent and safe environment. Parents have open access to the playroom at all times, with sleep room cameras visible from the coworking space. Daily whiteboards keep everyone updated on routines, while our app allows for quick communication and reassurance. Parents remain involved in sensitive routines, such as toileting, ensuring safety, dignity, and trust are upheld at all times.

Working in this environment is very different to traditional childcare. Instead of being burdened with paperwork and checklists, our focus is solely on caring for and playing with the children. Parents are nearby to support if needed, allowing us to respond quickly and flexibly to each child's cues. This shared model creates stronger bonds, reduces stress for families, and allows educators to devote their energy to meaningful interactions rather than administration.

For today's workforce, this model is not just desirable but necessary. Parents want to return to work, but they don't want to sacrifice being present for their baby. BubbaDesk allows them to do both—working productively while staying close enough to provide comfort, feed, or simply check in. It reduces stress for parents, supports longer breastfeeding journeys, and helps employers retain critical staff earlier. In every way, BubbaDesk represents a modern, responsive approach to care that benefits children, parents, and workplaces alike.

## 12. APPENDIX

### Why Close Proximity Care Matters

#### Overview

BubbaDesk's model of **proximity-enabled child care** rests on the idea that keeping parents close to their infants while they work or study can support attachment formation, brain development and lifelong learning. Recent research on attachment, infant brain development and childcare quality provides a scientific foundation for this approach.

- **Attachment develops early:** The attachment bond is not fixed at birth; it develops in the first years of life and is shaped by the caregiver's behaviour. Bowlby noted that "during the first two or three years the pattern of attachment is a property of the relationship".

This means caregivers have the capacity to strengthen or change the attachment pattern through how they respond to the child.

- **Early years and brain development:** Medical reviews highlight that infancy is a period of massive brain growth; by age three, a child's brain reaches about 90% of its adult size. The quality of early relationships influences how the brain develops, how neural pathways are pruned, and whether children learn to regulate emotions, form relationships and acquire language. Good early bonding lays the groundwork for happiness, independence and resilience later in life.
- **Sensitive responsiveness predicts secure attachment:** A 2025 synthesis of attachment studies reports that **sensitive caregiving** - accurately interpreting and responding to a child's signals - is a better predictor of later child outcomes than their category obtained from the Strange Situation (SSP) test: Classic classifications are **secure, avoidant, resistant/ambivalent, disorganised**. Researchers observed mothers and fathers responding to infants' cues about hunger, sociability and exploration; interpreting these signals and encouraging engagement fostered motor, cognitive and social development. Other reviews similarly conclude that sensitive parenting is crucial for secure attachment and is associated with positive cognitive, emotional and language outcomes.
- **Micro-processes in early interaction.** Microanalysis studies film mother-infant interactions at one-second intervals, revealing a "dance" of mutual adjustment. By 3–4 months, mothers and infants coordinate **gaze, facial expressions, vocal rhythms, body orientation** and **touch**. These moment-to-moment adjustments, called **interactive contingency**, predict attachment outcomes: infants whose interactions involve more coordinated responses are more likely to be securely attached. This approach shows that security arises from **micro-exchanges** of soothing, play and reconnection, not from one-off interactions.
- **Day care interacts with maternal sensitivity.** Large cohort studies (ie. the NICHD study) show that **insensitive caregiving** is the strongest predictor of insecure attachment, but the effect is amplified when infants spend long hours in multiple or low-quality child-care arrangements. Conversely, good-quality day care can buffer some risks, yet it cannot fully substitute the caregiver's "safe-haven" role. Some research even notes that extensive centre-based care in the first year can increase disorganised attachment unless the care is high-quality.
- **Parental closeness matters.** A recent review on the developmental needs of young children argues that healthy development requires **love expressed through close**

**parental care and contact;** this contact fosters bonding and helps children meet their emotional needs. The article notes that parents often place children in day nurseries because of work demands, but warns that separation in the early years can raise questions about children's developmental outcomes. It emphasises that decisions about institutional care should consider children's developmental requirements and the potential consequences of early separation.

### First three years are critical

- **Attachment patterns form and change during the first three years,** as Bowlby observed. BubbaDesk's model enables parents to remain physically close to their infants during this sensitive period, allowing them to respond to cues and build a secure base. The co-location of work/study and childcare means parents can feed, settle or comfort their children quickly step in when required, reinforcing the attachment bond.
- **Brain growth and early learning depend on relationships.** Research showing that brain development is linked to early attachment supports the idea that keeping parents nearby during infancy can nurture brain development and long-term learning. BubbaDesk's environment preserves the opportunity for repeated, attuned interactions between parent and child while still allowing parents to engage in work or study.

### Sensitive parental responsiveness

- **Stronger predictor than daycare variables.** Observational studies in *Developments in Attachment Research* found that sensitivity - parents' ability to interpret and respond to their children's signals - more strongly predicts later outcomes (than the Strange Situation (SSP) classification (secure/avoidant/ambivalent/disorganised) at about 12–20 months). **Caregiver sensitivity was the stronger predictor** of how children do later (socially, emotionally, sometimes academically). BubbaDesk's proximity model is designed to **increase the number and timeliness of sensitive responses - breastfeeding, settling and re-settling, responsive holding and touch from parent, calm co-regulation and swift repair after mismatches** - by enabling parents to step in during micro-breaks and/or if required. This is precisely the kind of caregiving shown to support secure attachment and better long-term outcomes.
- **Secure relationships enhance learning.** Reviews in the *Child Encyclopedia* highlight that secure attachment nurtured by sensitive parenting fosters cognitive, emotional and language development. By supporting sensitive responsiveness while parents work or study, BubbaDesk potentially enhances the developmental benefits associated with secure attachment.

### Daycare can buffer risks but cannot substitute the safe-haven role

- **Dual-risk phenomenon.** The NICHD study shows that the risk of insecure attachment is greatest when maternal sensitivity is low and children spend long hours in low-quality care. Quality day care can help, but it is most effective when combined with sensitive parenting. BubbaDesk does not seek to replace parents; instead, it combines professional educators with parental involvement to buffer risks while preserving the primary attachment.
- **Importance of parental closeness.** Some researchers emphasise that a child's proper development requires close parental care and contact; they question whether separating infants from parents for nursery care truly benefits development. BubbaDesk's proximity care allows parents to maintain this close contact even while working or studying.

### Proximity multiplies micro-exchanges

- **Moment-to-moment coordination.** Microanalysis studies show that mothers and infants co-regulate through gaze, facial expression, vocal rhythms, orientation and touch. These micro-exchanges build expectancies about how the caregiver will respond and contribute to the infant's internal working model of attachment. BubbaDesk operationalises attachment research on micro-processes by enabling brief, regulated parent–infant contacts (feeds, settles, repairs) at the right moments, in proximity-ready spaces, while educators protect routine and coach co-regulation - turning moment-to-moment science into everyday practice.
- **Frequent contact fosters security.** By keeping parents nearby, BubbaDesk **increases opportunities** for these micro-exchanges during the work or study day. Parents can briefly soothe, play, feed or reconnect, while educators facilitate structured play and creative learning. This combined approach can reinforce secure attachment while providing early learning experiences.

### Application to BubbaDesk's model

1. **Co-location of care and work/study:** BubbaDesk places childcare and parental work/study in the same environment. This design supports secure attachment by allowing parents to respond, promptly through proximity, to their child's cues without leaving the workplace.
2. **Combining parental and professional care:** Professional educators provide developmentally appropriate, play-based learning, while parents remain available for feeding, settling and brief interactions. This dual focus mirrors research emphasising that high-quality daycare can buffer risks but parental sensitivity remains central.
3. **Supporting lifelong learning:** The proximity model allows parents to engage in higher education or professional upskilling without sacrificing attachment-building time.

Research showing that brain growth and early learning rely on secure relationships underscores the value of enabling parents to study while remaining close to their infants.

4. **Facilitating micro-interactions:** Frequent micro-exchanges (mutual gaze, shared smiles, quick cuddles) strengthen the parent–child bond. Studies on interactive contingency show that these moment-to-moment responses are fundamental to attachment security. BubbaDesk's environment promotes such exchanges.
5. **Adapting to individual needs:** Research indicates that the effects of daycare vary by context and that children differ in their susceptibility to environmental influences. The flexible nature of BubbaDesk's proximity care allows parents and educators to adapt support based on each child's temperament and needs.

The evidence suggests that **proximity-enabled care models** like BubbaDesk are grounded in current attachment research. The first years of life are critical for forming secure attachments and supporting brain development. Sensitive caregiving predicts secure attachment and positive developmental outcomes. While high-quality daycare can buffer risks, it cannot substitute the caregiver's safe-haven role. Microanalysis shows that frequent, subtle interactions build security. By integrating professional childcare with parental proximity, BubbaDesk provides a practical environment where parents can work or study while maintaining the responsive, attuned relationships that underpin secure attachment and healthy development.

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## Why BubbaDesk Cannot Be Retrofitted into Traditional Daycare Regulation

### 1. Close Proximity Assumption

- **Long Day Care & Family Day Care:** Both assume full parental separation. Once a child is signed in, the provider assumes *full legal and operational responsibility* for the child until pickup.
- **BubbaDesk:** Parents remain onsite in coworking and are required to check in every three hours. They retain legal liability and can feed, settle, or remove their child at any time.
- Current frameworks have no mechanism for a **shared-duty model** where parents remain proximate and accountable.

### 4. Physical Environment Requirements

- **Long Day Care:** Requires large multi-room facilities, outdoor space of at least 7m<sup>2</sup> per child, segregated cot rooms, and partitioned nappy change areas.
- **BubbaDesk:** Operates from commercial coworking sites with a **single-room model** for children 0–3. The design prioritises transparency (all children visible at all times), calm sensory environments, and capped capacity (max 17 children).
- Regulatory standards designed for 100+ child centres cannot be sensibly applied to **small-scale, single-room environments** like BubbaDesk.



**Solution:** allow **flexible outdoor compliance** (parents encouraged to take children for walks/outdoor breaks), and provide **capital support** for purpose-built hubs that include outdoor areas over time.

## 5. Staffing and Employment

- **Long Day Care:** Responsible Staff can be as young as 18 with Certificate III qualifications; students (aged 16) on placement can be counted in ratios; agency and casual staff are used frequently to plug gaps.
- **BubbaDesk: No staff under 24.** All directly hired (no agencies), vetted through a three-step interview, reference checks, and a trial day with children. Many staff are mothers themselves, bringing maturity and lived experience. Staff are always rostered in pairs or teams; no one is ever left alone with children.
- These higher standards **exceed current regulation** but cannot be captured under frameworks built for high-turnover, casualised centres.

## 6. Age Cohorts and Program Design

- **Long Day Care:** Licensed for children from 6 weeks to school age, spread across multiple rooms. Programs are geared toward mixed cohorts and school readiness.
- **BubbaDesk:** Designed **exclusively for 0–3 year olds**, with play-based, attachment-oriented programming focused on the first 1,000 days.
- A model that is intentionally **age-restricted and attachment-sensitive** does not align with frameworks intended for broad early learning cohorts.

## 7. Liability and Duty of Care

- **Long Day Care & Family Day Care:** The provider assumes full duty of care for the child while in attendance; parents are not present.
- **BubbaDesk:** Parents remain legally liable while onsite. Educators provide structured care and supervision, but the parent remains available for feeding, settling, or



emergencies.

- Current law does not account for a **shared liability model** where the parent's role is integral to the service.

## The Policy Inconsistency: Why Family Daycare but Not Adjunct Care?

Currently, **family daycare** is fully eligible for the Child Care Subsidy (CCS). Yet by design, family daycare is:

- Delivered in a private home, often with **only one adult responsible for up to four children** under preschool age.
- Conducted in **closed, non-transparent environments** where parents have limited visibility of daily care.
- Environments where **other adults may be present in the home**, unknown to families, with minimal oversight.
- A model where, tragically, parents may never know if something is amiss until harm is done.

By contrast, **adjunct care models like coworking with onsite childcare** provide:

- **Purpose-designed spaces** specifically for the care of infants and toddlers aged 0–3.
- **Open-plan, transparent environments** where parents can see and access the care space at any time.
- **Safe sleep spaces** and facilities built to early childhood standards.
- **Qualified educators** — not just one carer, but a professional team.

- **Parents onsite** and readily available, offering an additional safeguard and responsive caregiving.

It is difficult to understand how **family daycare is recognised and subsidised, despite its structural risks, while adjunct care — which offers higher transparency, more staff, safer spaces, and parental presence — is excluded from CCS.**

This inconsistency undermines family choice and penalises those who seek safer, more transparent alternatives.

**Recommendation:** Coworking with onsite ancillary childminding must be recognised as a **funded childcare option** within CCS, on par with family daycare and long daycare, with its own regulation to embed safety and quality from the outset.

## **Proposed Regulatory Principles for a New Category: close proximity Childcare**

### **1. Service Scope**

- Care is provided **onsite in coworking or corporate environments**, with parents working in immediate proximity.
- Designed specifically for **children aged 0–3 years**, reflecting attachment science and parental demand in the first 1,000 days.
- Care is not incidental (like gym crèches), but structured, programmed, and developmental in nature.

### **2. Parental Presence and Liability**

- Parents must remain **onsite at all times**.
- Parents are required to **check in with their child at least every 3 hours**.

- Legal liability is **shared**: parents remain responsible for their child's welfare while educators provide professional supervision and care.

### 3. Group Size and Ratios

- **Maximum of 17 children per service, per day.**
- Care must be provided in a **single-room environment**, ensuring all children are visible at all times.
- **Ratios of 1:4 across all ages (0–3)**, with no “under the roof” averaging permitted.
- Educators not directly engaged with children (e.g. cleaning, admin) **cannot be counted** in ratios.

### 4. Staffing and Hiring Standards

- **No staff under 24 years old.**
- **Direct hiring only** — no agency or labour hire staff permitted.
- **Three-step interview process** including scenario testing and final approval by a senior leader/founder.
- **Independent reference checks** required for all staff.
- **Trial day** with children prior to final hire.
- WWCC (or state equivalent), with mandatory checks monthly (using platforms like Oho)
- Staff must work in **pairs or teams** at all times; no educator is ever left alone with children.

### 5. Qualifications and Training

- All educators must hold a **minimum Certificate III in Early Childhood Education and Care**.

- Ongoing professional development required in:
  - Child protection
  - Safe sleep practices
  - Secure attachment and responsive care
  - Health, hygiene, and first aid (including CPR)
- Parents encouraged to participate in **orientation and ongoing familiarisation** sessions to support safe transitions.

## 6. Environment and Facilities

- Services operate in **commercial coworking or workplace settings, in a purposely designed space minimum 150m2 - inclusive of sleep rooms.**
- Must provide:
  - Safe, child-proofed single playroom with developmentally appropriate resources
  - Design for transparency and supervision (no blind spots, closed rooms, or isolation)
  - Safe sleep arrangements visible to staff and parents (e.g. monitored cot spaces, live cameras)
  - Age-appropriate meal and feeding facilities (including breastfeeding space)
- Outdoor space encouraged but not mandatory if appropriate indoor gross-motor resources provided, and parents encouraged to take child outside during the day.

## 7. Transparency and Parent Engagement

- Parents may enter the childcare room at any time.
- Parents provided with **real-time visibility** (e.g. live video to a secure app).

- Immediate notification to parents of any illness, incident, or injury.
- Services must document safety, health, and wellbeing practices and make them available to parents on enrolment.

## 8. Insurance and Accountability

- Services must hold:
  - Public liability insurance
  - Professional indemnity insurance
  - Workers' compensation for staff
- Parents remain **onsite and legally liable** for their child. This shared-duty model must be recognised in law as distinct from full daycare transfer of liability.

## A Model That Builds Trust

Close proximity care embeds **transparency by design**: parents are present, able to see, visit, and engage with their child throughout the day. This directly addresses parental fears about closed childcare environments.

## Economic and Workforce Benefits

By giving families real choice, close proximity care:

- Enables mothers to return to work earlier and more flexibly.
- Retains skilled professionals in the workforce.
- Reduces long-term productivity losses associated with career breaks.
- Increases tax revenue through higher labour force participation.

## Addressing the Terms of Reference

### (a) Health and safety of children in childcare

Close proximity strengthens safety through proximity and parental oversight. BubbaDesk adds safeguards including:

- Hiring only staff over age 24.
- Employing a female-only team, many mothers themselves.
- Minimum Certificate III qualifications for all staff.
- Introducing psychometric screening to ensure suitability for caregiving roles.

**Recommendation:** Embed transparency, proximity, and evidence-based hiring into close proximity regulation.

### (b) Effectiveness of the regulatory system

Close proximity care does not fit under current frameworks eligible for CCS:

- **Parent proximity** changes the safety equation.
- **Physical environment** differs: coworking spaces are often retrofitted and may not include dedicated outdoor areas.

Forcing Close proximity care into long daycare rules (e.g. mandatory onsite outdoor areas) makes it unviable. Instead:

- Parents should be encouraged to take children outside during the day (walks, breaks).
- Outdoor requirements should be flexible but still prioritise child wellbeing.
- Future government funding should support **purpose-built Close proximity hubs** with outdoor spaces.

**Recommendation:** Create a dedicated regulatory category for Close proximity care, co-designed with BubbaDesk, that reflects its unique structure.

### **(c–e) Compliance, employment practices, and educator pay**

BubbaDesk has pioneered safer workforce recruitment:

- Minimum age of 24.
- Preference for staff with lived parental experience.
- Mandatory qualifications.
- Psychological suitability testing.

These practices could set new benchmarks across ECEC. It's how we hire as much as who we hire.

**Recommendation:** Reform recruitment standards sector-wide to include maturity, lived experience, and psychometric suitability alongside qualifications.

### **(f) For-profit incentives**

Large-scale operators sometimes prioritise efficiency over quality. Close proximity care, by contrast, is small-scale and embeds parental transparency, naturally increasing accountability. BubbaDesk operates a 1 x room space, with no “under the roof” ratios, with small scale numbers.

### **(g) Transparency**

Parents' number one demand is transparency. Close proximity care delivers this structurally: parents are onsite and engaged.

**Recommendation:** Recognise transparency and proximity as system-wide safety benchmarks.

## **(h) Suitability and flexibility of funding**

With CCS restricted to long daycare and family daycare, families choosing close proximity care options like coworking with onsite childcare must pay the full cost. This creates inequity and locks out many who would otherwise benefit.

At present, **childcare is the largest barrier to women's workforce participation** (ABS, 2023). Removing this barrier by expanding CCS to fund coworking with onsite childcare would not only improve family wellbeing but also deliver significant economic returns.

**Recommendation:** Expand CCS to include close proximity care options like coworking with onsite childcare, ensuring funding parity and real family choice.

## **(i) Choice of care options**

Real choice means recognising diverse needs. Close proximity provides:

- Options for families not ready for separation.
- Breastfeeding-friendly environments.
- Flexible schedules for hybrid, part-time or casual workers.
- Smaller, transparent environments suitable for infants.

**Recommendation:** Support genuine family choice by funding and regulating coworking with onsite ancillary childminding services.

## **(j) Any related matters**

The first 1,000 days are critical. Policies that embed attachment science and fund proximity-based care options will deliver lifelong benefits for children and economic gains for the nation.



## Links & Reports

**Victoria** - insights from Victorian parents on their needs and requirements for childcare today. Including real stories around how the current care system does not support their needs. [Read here >](#)

Queensland - insights from Queensland families around the impact of close proximity childcare for their families. [Read here >](#)

