



## **(APC) Response to the Inquiry on the Early Childhood and Care Three-Day Guarantee Bill 2025**

Submission to the Australian Government

### **1. Introduction**

The **Australian Parents Council (APC)** welcomes the opportunity to provide feedback on the **Early Childhood and Care Three-Day Guarantee Bill 2025**. As the peak national representative body advocating for the rights and interests of families of students in Independent Schools, in education and early childhood development, APC strongly supports initiatives that enhance **accessibility, affordability, and quality** in early childhood education and care (ECEC).

We recognise the **importance of early learning** in shaping children's future success and ensuring equitable opportunities for all families. However, we also acknowledge **key challenges** that need to be addressed to ensure that this policy effectively meets the needs of Australian families.

### **2. Overview of the Bill**

The **Early Childhood and Care Three-Day Guarantee Bill 2025** proposes to:

- ✓ Ensure **all children** have access to at least **three days per week of early childhood education and care**.
- ✓ Support **working families, disadvantaged communities, and vulnerable children** by reducing financial and logistical barriers to ECEC.
- ✓ Increase **government investment in early learning** to create a **more inclusive and equitable system**.<sup>1</sup>

While the intent of the Bill is commendable, APC seeks to highlight **key considerations and potential impacts** on families, educators, and the broader early childhood sector.

### **3. Key concerns, and what APC would like consideration given to**

#### **3.1. Parental choice and flexibility**

**Concern:**

- While guaranteeing **three days of early childhood education** is beneficial, **parental choice must be respected**. Not all families require three days of formal care, and some prefer **home-based learning, family daycare, or informal arrangements**.<sup>2</sup>
- A **one-size-fits-all model** may not accommodate the diverse needs of families, particularly **those in rural areas, culturally diverse communities, or with flexible work arrangements**.<sup>3</sup>

- APC has listened to its members, and rural and remote families in forums with the Isolated Children's Parent Association (ICPA), who have raised concerns for their families.

#### What APC would like to see:

- ◆ Ensure **flexibility** in how the three-day guarantee is implemented, allowing parents to **opt in or out** based on their needs.
- ◆ Recognise **alternative early learning models** (e.g. **family daycare, home learning programs, and community-led initiatives**) as valid options.<sup>4</sup>

### 3.2. Accessibility and workforce shortages

#### Concern:

- The ECEC sector is **already facing a workforce crisis**, with **staff shortages, high turnover rates, and increasing burnout** among educators.<sup>5 6</sup>
- If demand for ECEC increases due to the three-day guarantee, **existing services may struggle to meet demand**, leading to **longer waitlists and accessibility issues** –especially in **regional and remote areas**.<sup>7</sup>

#### What APC would like to see:

- ◆ Invest in **recruitment, training, and retention strategies** for early childhood educators to ensure **high-quality care can be maintained**.
- ◆ Prioritise **incentives for early childhood professionals**, such as **higher wages, better working conditions, and professional development support**.
- ◆ Ensure that **ECEC expansion includes rural and underserved communities** to avoid worsening **inequities in access**.<sup>8</sup>

### 3.3. Affordability and financial impact on families

#### Concern:

- While the **three-day guarantee is a positive step, cost concerns remain**. Many families **already struggle with high childcare fees**, and it is unclear how **this policy will impact out-of-pocket expenses** for parents.<sup>9</sup>
- There are concerns that **increased government subsidies** may lead to **higher overall fees** if providers adjust their pricing models.<sup>10</sup>

#### What APC would like to see:

- ◆ Implement **clear fee regulations** to prevent unintended price hikes by ECEC providers.
- ◆ Ensure **additional subsidies for low-income families** to **prevent financial strain**.<sup>11</sup>
- ◆ Introduce **means-tested models** that consider household income and the **cost-of-living pressures in different regions**.

### 3.4. Quality and developmental outcomes

#### Concern:

- Expanding ECEC access is **only beneficial if quality is maintained**.<sup>12</sup> Without **proper oversight and educator support**, an increase in demand may lead to

**overcrowded classrooms, lower staff-to-child ratios, and reduced quality of care.**

- The focus should not just be on **quantity (number of days)** but also on ensuring **high-quality early learning experiences** that support **cognitive, social, and emotional development**.<sup>13</sup>

**What APC would like to see:**

- ◆ Implement **stronger quality assurance measures** to ensure that the expansion of ECEC **does not compromise educational outcomes**.
- ◆ Support **play-based learning approaches** that align with **best practices in child development**.
- ◆ Ensure ongoing **evaluation and consultation with parents, educators and child development experts** to assess the **impact of the three-day guarantee**.

## **4. Conclusion**

The **Early Childhood and Care Three-Day Guarantee Bill 2025** represents an **important step toward greater access to early learning** for Australian children. However, it must be implemented **with careful consideration of parental choice, workforce capacity, affordability, and quality assurance**.

The Australian Parents Council urges the government to:

- ✓ **Provide flexibility** for families to **choose their preferred early learning arrangements**.
- ✓ **Invest in the ECEC workforce** to ensure **adequate staffing and quality care**.<sup>14</sup>
- ✓ **Guarantee affordability** and prevent **unexpected cost increases for parents**.<sup>15</sup>
- ✓ **Monitor and evaluate the policy's impact** on **children's learning and development outcomes**.

We appreciate the opportunity to contribute to this inquiry and look forward to **continued collaboration with the government and stakeholders** to shape policies that best support Australian families and their children's futures.

**Submitted by: Australian Parents Council**

## **References**

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<sup>2</sup> <https://raisingchildren.net.au/grown-ups/work-child-care/organising-child-care/child-care-types>

<sup>3</sup> <https://icpa.com.au/au/rural-and-remote-families-demand-urgent-overhaul-education-support-geographically-isolated>

<sup>4</sup> <https://icpa.com.au/au/country-kids-shouldnt-miss-out-rural-coalition-calls-universal-access-early-childhood-education>

<sup>5</sup> <https://www.thenewdaily.com.au/news/national/2024/09/03/early-childhood-education-workforce-crisis>

<sup>6</sup> <https://melbourneinstitute.unimelb.edu.au/news/news/2025/a-sensible-path-towards-high-quality-early-childhood-education-in-australia>

<sup>7</sup> <https://thesector.com.au/2024/04/15/annabelle-cleeland-advocates-for-ecec-access-in-parliament/>

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<sup>8</sup> <https://icpa.com.au/au/rural-and-remote-families-demand-urgent-overhaul-education-support-geographically-isolated>

<sup>9</sup> <https://vic.liberal.org.au/news/2024-02-05-victorian-families-paying-the-highest-childca#:~:text=The%20average%20cost%20of%2050,all%20but%20one%20income%20level.>

<sup>10</sup> <https://www.accc.gov.au/media-release/pricing-practices-and-operating-costs-of-childcare-services-to-be-examined-as-latest-accc-report-confirms-fees-outpaced-inflation>

<sup>11</sup> <https://melbourneinstitute.unimelb.edu.au/news/news/2025/a-sensible-path-towards-high-quality-early-childhood-education-in-australia>

<sup>12</sup> <https://www.edresearch.edu.au/sites/default/files/2024-06/linking-quality-and-child-development-in-ecec-research-summary-aa.pdf>

<sup>13</sup> <https://littleassets.com.au/the-impact-of-quality-childcare-on-early-childhood-development/#acknowledged>

<sup>14</sup> [https://www.earlychildhoodaustralia.org.au/wp-content/uploads/2024/08/MR\\_WAGE-INCREASE.pdf](https://www.earlychildhoodaustralia.org.au/wp-content/uploads/2024/08/MR_WAGE-INCREASE.pdf)

<sup>15</sup> <https://icpa.com.au/au/rural-and-remote-families-demand-urgent-overhaul-education-support-geographically-isolated>