



Committee Secretary  
Senate Education and Employment Committees  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Madam or Sir

On **15 September 2016**, the Senate referred an inquiry into the Family Assistance Legislation Amendment (Jobs for Families Child Care Package) Bill 2016, and the Social Services Legislation Amendment (Family Payments Structural Reform and Participation Measures) Bill 2016 to the Education and Employment Legislation Committee for inquiry and report by **10 October 2016**.

This submission from the National Foundation for Australian Women (NFAW) addresses certain general propositions concerning the legislation.

The NFAW is a non-politically aligned feminist organisation committed to examining the potentially differential impact of policies and their outcomes for men and women and whether the consequences of policies, intended or unintended adversely affect women.

The NFAW has been a long time proponent of reform to child care provision and funding, including through submissions to the Productivity Commission inquiry, and prior to that having written, contracted and published numerous research and policy analyses of issues around early childhood care and education, as well as out of school hours and school vacation care for the young school aged child.

We have previously supported the broad approach of the recommendations made by the Productivity Commission as to simplifying the method of providing for fee relief, providing a cap on approved per diem charges which would attract subsidy, and making payments directly to the service provider.

We have expressed some reservation about potential problems arising from the requirements for activity by parents, and more specifically about the essentiality of ensuring that the children living in socially and/or economically disadvantaged families should continue to have access to adequate early childhood care and developmental programs.

In this context we draw to attention the current Boyer Lectures by Professor Sir Leslie Marmot. The Second Lecture – give every child the best start<sup>1</sup> – restates the case for, and the long term value of, access to appropriate developmental programs in early childhood.

Early childhood care and development policy, just as with paid parental leave policy, must have at least two clearly defined objectives. In the case of the current legislation, one is the enhancement of child development, another is facilitation of parental work force participation. Each is of importance, one is not more important than the other.

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<sup>1</sup> <http://www.abc.net.au/radionational/programs/boyerlectures/boyer-lecture-give-every-child-the-best-start/7787486>

Similarly with parental leave policy, one goal is the facilitation of parental work force participation, another is the enhancement of infant-maternal bonding.

Senators may recall the ambivalence of many in the community about encouraging women to enter and remain in the workforce – at least one element of that lies in proper concern for the parent-child relationship and the appropriate attention to the care and development of the child. Policies which now reflect, or appear to reflect, little interest in the needs of the child compared to encouragement of parental workforce attachment may prove to be ultimately costly and socially destructive as Professor Marmot so eloquently demonstrates.

There is quite clearly a degree of legitimate concern being expressed about aspects of the current legislation before the Parliament, just as there is pressure for the Government to act on its promises to improve child care.

NFAW suggests, as it did when the paid parental leave legislation was initially before the Senate, that it is important for the legislation to contain a clear statement of measurable objectives, and for Government to make legislative and financial provision for independent evaluation of the implementation and outcomes of the legislation after a certain specific period of time.

Such a course of action may make some of the critics more willing to accept the new approaches.

In particular, in addition, NFAW seeks closer scrutiny in a shorter time period of the impacts on disadvantaged children, in particular children of aboriginal families and children from linguistically diverse communities, who need special early support to ensure that they are ready for school.

That said, NFAW remains resolutely opposed to financing the proposed new expenditure by savings to Family Tax Benefits.

This submission has been endorsed by the NFAW Board.

Yours faithfully

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Mary Crawford  
President, NFAW  
September 2016