Cultures of in-home child care: Nannies, migration and early childhood education and care policy in Australia, the United Kingdom and Canada

Author:
Adamson, Elizabeth

Cultures of in-home child care:

Nannies, migration and early childhood education and care policy in Australia, the United Kingdom and Canada

Elizabeth Adamson

A thesis in fulfillment of the requirements for the degree of

Doctor of Philosophy

UNSW

Social Policy Research Centre

Faculty of Arts and Social Sciences

January 2015

Abstract

This study examines the place of in-home child care, commonly referred to as care by nannies, in Australia, the United Kingdom and Canada since the 1970s. In contrast to childminding or family day care provided in the home of the carer, in-home care takes place in the child's home. Once considered the preserve of the wealthy, demand for in-home child care has increased in response to changes in the labour market and governments have, to varying degrees, incorporated it into wider policy settings. Governments increasingly justify expenditure on early childhood education and care (ECEC) by reference to the dual objectives of enhancing early childhood development and supporting parental employment. This liberal approach to social investment has been characterised by the introduction of market mechanisms in the delivery of ECEC, and other social care services. In-home care sits somewhat uneasily in the child development frame since providers typically are not required to meet the same standards as mainstream ECEC providers.

Informed by theories of institutionalism and welfare regimes literature, the thesis uses the concept of 'care culture' to examine how in-home child care has been repositioned within ECEC and broader welfare state policies. It traces the emergence of in-home child care and compares how it is supported by government policy through funding and regulation. The research extends beyond the ECEC domain to consider how migration policy facilitates the provision of child care in the private home. Using a mix of qualitative research methods, including analysis of policy details in each country, government and sector documents and 60 interviews with key policy stakeholders across three countries, it shows how three liberal countries with common policy structures and discourses, in practice, developed different approaches to in-home child care. It illustrates the implications of these policies for families and care workers. It proposes that these differences are shaped by both structural and normative understandings about appropriate forms of care that cut across gender, class/socioeconomic status and race/migration. Overall, it argues that greater attention needs to be given to the way child care work in the private home is situated across ECEC and migration policy.

Table of Contents

Front matter

Acknowledgements

To my supervisors – Professor Deborah Brennan and Professor Fiona Williams – I could not have asked for a better duo to look to for inspiration and mentorship. Deb, your generosity with your time, providing new opportunities and genuine interest in developing my ideas is greatly appreciated. I cannot thank you enough. Fiona, your guidance and support motivated me from beginning to end, and your own achievements have instilled an enthusiasm for future research in this field. To all my friends, colleagues and fellow students at SPRC, your encouragement and support is greatly appreciated. Thank you for the hallway chats, coffee cart runs and kitchen banters – my PhD journey has been much more enjoyable and fulfilling because of you. And to kylie and Trish for your fantastic job as HDR coordinators.

To my family – Mom, Dad, Geoff and Heather – thank you for your endless support in my career and life. Your diverse perspectives have challenged my ideas and strengthened my arguments. You're always there at the other end of the phone to celebrate daily progress or help work through difficult times. To all my friends and extended family (on both sides of the pond), thanks for keeping my work-life balance in check! And to Pete, thank you for being there from (almost) day one. Your love and support is appreciated more than you know. You provide a positive distraction and something to look forward to, whether it's an upcoming visit or a daily chat. I can't imagine the last three and half years without you.

To all the research participants – thank you for sharing your time and knowledge with me. The rich information you provided contributed to an understanding of the dynamics and complexities of child care, nannies and early education that goes far beyond the scope of this project. And lastly to the Australian Research Council, and the Faculty of Arts and Social Sciences and Graduate Research School at UNSW for the generous financial support that made it possible to undertake this research and present my findings at conferences in Australia and internationally.

Publications

Journal article

Adamson, E. and Brennan, D. (2014). "Social investment or private profit? Diverging notion of 'investment' in early childhood education and care." International Journal of Early Childhood, 46(1), DOI:10.1007/s13158-013-0098-x

Conference presentations

Adamson, E. (2014). Reshaping care work in the home: the case of in-home child care in Australia, the UK and Canada. Work and Family Researchers Network, New York, June 19-21, 2014.

Adamson, E. (2014). Competing pressures, actors and interests in ECEC: Comparing the origins of in-home child care in Australia, the UK and Canada, Canadian Sociological Association, Brock University, May 29, 2014.

Adamson, E. (2014). 'Cultures of In-home childcare: Australia, the UK and Canada', Gender, Migration and the Work of Care Conference, University of Toronto, Toronto. February 28-March 1.

Adamson, E. (2013). Debates and inequalities surrounding In-home child care in Australia, the UK and Canada: Implications for the recognition of care workers. Australian Social Policy Conference. University of New South Wales, Sydney, 16-18 September.

Adamson, E. (2013). Comparative In-home child care policy in Australia, the UK and Canada: Intersecting inequalities and implications for the recognition of care workers. Social exclusion and the challenges of inclusion: social policies addressing intersecting inequalities. Budapest, Hungary, Research Committee 19, 22-24 August.

Adamson, E. (2013). Interactions between policy, discourse, and culture: Comparing government support for In-home child care in Australia, the UK and Canada. State, Society and Citizen: Cross-disciplinary perspectives on welfare state development. Reykjavik, Iceland, NordWel and REASSESS International Summer School, 15-20th August.

Adamson, E. (2013). Contradictions between discourse and policy? Comparing In-home child care in Australia, the UK and Canada. Changes and Challenges in a Globalising World: Fifth International Community, Work and Family Conference, University of Sydney, 17-19 July.

Note on Terminology

Home-based care – Unless specified 'home-based' refers to care provided in the home of the care provider as distinct from 'in-home' care provided in the home of the child (see below).

- In Australia, the term refers to family day care (FDC)

- In the UK it refers to childminders

- In Canada it denotes both licensed home-based care and unlicensed private home care

Caregiver – this term is used in circumstances where it is recognised in the context (national/historical). It is most often used in reference to the Live-In Caregiver program in Canada.

Centre-based care – refers to part-day and full-day care and early education settings provided outside the home of the child or caregiver. This includes preschools, kindergartens, day nurseries, long day care, occasional care (Australia), child care centres, among others.

Child care vs. childcare – 'Child care' is used most often to refer to all types of non-parental care for young children. The alternative 'childcare' is used in circumstances that are specific to policy reforms or contexts that use this terminology. For example, a number of policy agendas use 'childcare' in the title.

Child care vs. ECEC –ECEC is a commonly recognised term in all three study countries. However, 'child care' is used to discuss historical developments in order to maintain consistency with the terminology of the period.

In-home (child) care – this term is used throughout to refer to 'non-relative care provided in the child's home'. It encompasses nannies, *au pairs*, domestic work that includes child care duties, and other in-home care programs specific to different countries. It also incorporates formal in-home care programs specific to each country (i.e. Live-In Caregiver Program in Canada, In Home Care in Australia and Home Childcare in the United Kingdom).

Nanny/Nannies – the tern 'nannies' is used to refer to more specific forms of culturally recognised forms of 'in-home child care' that are prevalent in each of the three countries. While 'in-home child care' is increasingly used in official policy discourse, 'nannies' was still the most common term used in interviews with key stakeholders.

- In Australia, 'nanny' is used to distinguish between formal In Home Care and other forms of 'in-home child care'.

- In the UK, 'nanny' is used in almost all circumstances except when specific programs are discussed. 'Nannies' increasingly encompasses *au pairs*.

- In Canada, 'nanny' refers to the migrant care workers recruited through the Live-In Caregiver program, in addition to other local in-home child care workers. 'Nannies' is used interchangeably for these two groups of care workers. The term 'in-home child care' had little resonance in interviews or in policy documents.

Acronyms

CCB (Australia) – Child Care Benefit

CCR (Australia) – Child Care Rebate

CCED (Canada) – Child Care Expense Deduction

CDAA (Canada) – Canadian Daycare Advocacy Association

DEEWR (Australia) – Department of Education and Employment Relations

DHS (Australia and England) – Department of Human Services

DNA (Ontario, Canada) – Day Nurseries Act

ECEC – early childhood education and care

EU – European Union

FDC (Australia) – Family Day Care

IHC (Australia) – In Home Care

LCP (Canada) – Live-In Caregiver program

LDC (Australia) – Long day care

NCMA (UK) – National Childminding Association

OCBCC (Ontario, Canada) – Ontario Coalition for Better Child Care

OECD – Organisation for Economic Co-ordination and Development

Ofsted (England) – Office for Standards in Education and Skills

OSHC (Australia) – Outside school hours care

UCCB (Canada) – Universal Child Care Benefit

WTC (UK) – Working Tax Credit

List of Tables

Chapter 1 : Introduction

Setting the context

Most countries across the developed and developing world are spending more on early childhood education and care (ECEC) than ever before. Increased public and private investment is driven by broad social and demographic changes; it is also driven by research evidence that shows high quality ECEC benefits children. ECEC does not, however, always meet the needs associated with maternal workforce participation and children's development and wellbeing at the same time. Some ECEC programs are designed specifically to meet children's early learning and development, notably part-day preschool or kindergarten for children in the year before school. Others, such as full-day care in centre- and home-based settings are typically designed to facilitate parents' employment. In the three liberal countries selected for this study – Australia, the United Kingdom (UK) and Canada – the number and proportion of children attending formal, regulated, centre-based forms of ECEC has increased since the 1960s. However, many families are seeking flexible, in-home child care solutions – such as nannies – to support the child care needs associated with longer work hours and non-standard forms of employment. These care arrangements are supported by some governments through funding and regulatory mechanisms.

While governments around the world are emphasising universal, high quality, professional ECEC, many parents still rely on more informal home-based care by grandparents, other relatives and friends and, increasingly, non-relative in-home carers as their primary or supplementary choice for care. Some governments actively support such forms of care. There is no internationally consistent definition for informal and formal child care and in-home child care often crosses a blurred boundary between the two, discussed below. This research focuses on *in-home child care* defined as government subsidised, non-relative, care provided in the child's home, by in-home child carer workers, including nannies. This study focuses on in-home child care policy

in Australia, the UK, and Canada. For Canada, analysis focuses on the province of Ontario, which is discussed further in Chapter 3. These three countries are regularly grouped together as liberal countries[1], where the care for young children is left primarily in the private sphere. Liberal theory plays an important role in understanding the similarities in these countries' market approaches to ECEC and, as discussed in Chapter 3, liberalism accounts for their differences. In this respect, these countries are selected for their similar approach to market-led ECEC, but also because of their distinct differences with respect to ECEC (and other) policy positions towards in-home child care.

The policy settings surrounding nannies and other forms of in-home child care provision differ in each of the three countries, as do usage patterns, regulatory and subsidy systems and public attitudes. These differences provide the starting point for this research. Trends in the usage of all forms of ECEC, including nannies, vary across the three countries. These trends are linked to both national and global policy changes and also attitudes about the most appropriate forms of care for young children. Changes in in-home child care trends and policy reflect national demographic, policy and cultural contexts, such as increasing women's workforce participation in combination with limited availability and funding for formal ECEC and, in some circumstances, embedded norms that favour private care arrangements. Global demographic changes also shape the nature of in-home child care, where women increasingly migrate to different countries and continents to seek employment opportunities. In some countries, national immigration policies encourage the migration of care workers across borders. The three countries selected for this study are destination countries for global migration,

---

1 The term 'liberal countries' is used to refer to the three study countries of Australia, the UK and Canada; and also to the broader liberal type, that includes the U.S. and sometimes New Zealand. The key tenet of liberal theory that is common across the three country studies is the reliance on the market for the delivery of services, which leaves the responsibility for ECEC in the private domain. This key tenet of liberalism has led to the use of policy mechanisms that promote individual choice (see Mahon, 2008; Mahon et al., 2012; O'Connor & Robinson, 2011; Wincott, 2008). This is discussed further in Chapter 2.

although the policies and programs to recruit care workers differ. An introduction to the trends and policies across Australia, the UK and Canada that shape the supply and demand of in-home child care is presented below, and is followed by an overview of the chapters.

Restructuring support for child care and early education

The early childhood education and care (ECEC) field has gained visibility and momentum on the policy agenda as scholars and international organisations have demonstrated the benefits of early learning and quality child care environments for children in the years before school. Governments and international organisations have, albeit to different extents, embraced the term 'Early Childhood Education and Care' (ECEC) to promote the dual focus of children's care and education on policy agendas. Research and advocacy in the fields of child development, gender equality and women's workforce participation, and child poverty have been among the prominent pressures behind governments' increasing responsibility for ECEC, and have informed the development of rationales for public investment in ECEC (Jenson, 2004; Lewis & Campbell, 2008; Lister, 2004; Mahon, 2010b; Prentice, 2009; White, 2012).

As ECEC has moved from a peripheral to central place on governments agendas, there are also changes in the way governments fund and deliver services. There have been shifts in emphasis from care to education, from community-based to market-provided services and from supply-side to demand-side funding. Therefore, while many governments should be applauded for increasing spending on ECEC and children more broadly, attention should be given to the design of child care and how it is shaped by welfare state restructuring. Debates about provision and funding of ECEC are not simply about how *much* government should spend (outlined in Table 3, below); just as important are the mechanisms through which subsidies are transferred to services and families. A key distinction is whether governments favour supply-side funding, where subsidies are delivered directly to service providers, or demand-side measures such as tax credits and vouchers, which put cash or its equivalent in the hands of 'consumers' to enable them to purchase services. Supply-side funding can be directed toward public or private (for-profit or not-for-profit) services, while demand-side funding follows the child encouraging reliance on the market to meet demand, which usually results in a

mix of providers. On the one hand child care has been professionalised through the expansion of (mostly supply-side funded) regulated, centre-based services provided by qualified staff (increasingly referred to as educators), but at the same time there have been moves in some countries to formalise (or modernise) informal care through the introduction of registration processes, tax credits and demand-side vouchers that can facilitate and subsidise non-parental care provided in the child's home. This restructuring has developed under differing ECEC (and other) policy contexts across welfare regimes, and also within welfare regimes.

There are active debates about the optimal approach to ECEC provision within international organisations, across regimes, and within countries and regions. While countries across the globe have adopted the term ECEC to denote a unified approach to care and education for young children, the extent of governments' involvement and responsibility for funding, delivering and regulating services remains varied (Organisation for Economic Co-operation and Development, 2006). And, in many cases traditional spheres of 'care' and 'education' remain divided along political, ideological and cultural lines (Jenson & Sineau, 2001; Kremer, 2007). Therefore, while governments' expenditure on ECEC increased across most Western countries in the past four decades, the *structure* and *purpose* of expenditure shifted in diverging ways.

Liberal welfare states have traditionally viewed the care of young children as a private matter for families (Baker, 2006; O'Connor, Orloff, & Shaver, 1999) and relied on private approaches to child care and ECEC – either market-led or familial. The marketisation of ECEC, facilitated through demand-side funding, creates a blurred boundary between public and private care arrangements, where services may be publicly funded but privately provided. Similarly, government support for certain types of familial care complicates the relationship between informal/formal and public/private responsibility for child care. A considerable amount of literature and policy analysis examines how government reforms and funding models affect ECEC outcomes. However, most policy evidence is drawn from research on centre-based care, which leaves an identifiable gap in policy research that focuses on more informal, non-relative, home-based ECEC, including care provided in the child's home. *In-home child care* therefore offers a new lens through which to analyse the continuum of formal and

4

informal, public and private, and sometimes familial and non-familial care. How does in-home child care differ across these three liberal countries? How and why has in-home child care transformed as part of welfare state restructuring? Answers to these two questions are touched on below, and underpin detailed examination in later chapters of this thesis, outlined in Chapter 3.

Nannies and in-home child care: Scope & definition

In-home child care straddles the boundary between informal and formal provision. To complicate the matter, there is no internationally agreed delineation between 'formal' and 'informal' care. A recent literature review of informal care in the UK noted that informal care

> is very diverse in practice, with childcare offered by grandparents, siblings, other relatives, friends and neighbours, as well babysitters, unregistered nannies, *au pair*s, unregistered private fostering and unregistered clubs for children. Some informal care is unpaid, while other informal carers receive payment, or some reimbursement in kind (Rutter & Evans, 2011, p. 5).

After acknowledging this diversity, the authors defined informal childcare as "childcare that is largely unregistered by the state for quality control, child protection and/or taxation purposes" (Rutter & Evans, 2011). This definition would not hold for informal child care in Canada however, where unregistered, informal care is eligible for taxation purposes. Domains of care are also distinguished by the location of care, relationship to the carer, and the form of reward (Land, 2002, p. 18). Some scholars simplify the distinction by defining informal arrangements as those that are "not formalised with contracts or employment rights"; while UK household level data collection includes care "which does not involve any monetary transaction" (Holloway & Tamplin, 2001, p. 2). The Australian Bureau of Statistics (ABS) and the Household Income and Labour Dynamics in Australia (HILDA) survey, define informal care as "non-regulated care, arranged by a child's parent/guardian, either in the child's home or elsewhere", contrasting it with formal care, that is regulated and occurs away from the child's home (Cassells, McNamara, Lloyd, & Harding, 2007, p. 125). Canadian surveys tend to distinguish between regulated (or licensed) and unregulated types of child care, rather than formal and informal. Unregulated nurseries, private preschools and private home

care are sometimes considered formal provision, even though they are not eligible for government subsidies (Beach, Friendly, Ferns, Prabhu, & Forer, 2009; Bushnik, 2006).

Definitions and classifications of different care arrangements have implications for analysing trends, and for understanding the goals and rationales behind governments' child care and ECEC approaches. For example, when reference to nannies and in-home child care shifts between informal and formal classifications in administrative data and policy strategies, it is difficult to monitor trends in demand and usage of all forms of ECEC. At the same time, these changes often represent shifts in government policy, for example when governments intervene through funding or regulation, the classification of in-home child care may move from informal to formal provision. Such indicators of change are, however, not always clear or well defined. For example, in recent policy discourses in the UK nannies are often referred to as formal care providers, even where this form of care remains a solely private responsibility. Rosie Cox points to the complexity of classifying in-home child care across the formal/informal domain. She suggests defining nannies as

> trained and qualified childcarers who are competent to be sole carers of babies as well as older children . . . In theory, nannies are meant to be childcare professionals who are responsible for providing a caring and stimulating environment for their charges . . . it is not really meant to include too much other housework (Cox, 2006, p. 72)

This definition is compared to other forms of in-home child care, such as *au pair*s and other migrant domestic workers, who traditionally are responsible for domestic tasks and often assist with child care, yet these workers increasingly take on a primary role caring for children.

Table 1, below, outlines the scope of in-home child care in the three countries and illustrates the complexity of defining in-home child care. These complexities are briefly introduced below, and examined further in later chapters. In Australia a distinction is made between formal in-home care educators (employed through a regulated In Home Care program) and 'nannies' (often including *au pair*s) who are privately employed by families. In the UK, the 'professional nanny', noted by Cox above, may be less common than two decades ago; however the term nanny increasingly refers to other forms of in-home child care, namely *au pair*s, but also babysitters, mothers' help and domestic

workers with child care responsibilities (Bryson, Brewer, Sibieta, & Butt, 2012; Busch, 2013; Social Issues Research Centre, 2009). In Canada, the term 'nanny' or 'live-in' often refers to migrant caregivers through the Live-In Caregiver program, distinct from 'local' or 'trained' nannies. Distinctions are sometimes made explicit by actors involved; however the discussion above shows that government policy can merge or blur the lines between such classifications.

Table 1: Comparing terms used for ECEC and in-home child care

Care Setting	Australia	United Kingdom	Canada
Full day - group setting	Long day care (LDC) (R)	Centre-based care / Day nursery (R)	Centre-based care, daycare (R)
Part day, temporary care - group setting	Occasional care (R)	N/A	N/A
Sessional, group setting, education focus	Preschool, kindergarten (R)	Preschool, kindergarten (R)	Preschool, kindergarten, nursery school (R)
Home setting (caregiver) - group	Family day care (FDC)(R)	Childminder (R)	Licensed Home-based Child Care (HCC) (R), private home care (X)
Home-setting (child or caregiver) relative	Grandparent/relative care (r)	Grandparent/relative care	Grandparent care/relative care
Home-setting (child) non-relative in-home child care	In Home Care (R), Nanny (r), *Au pair*, babysitter (X)	Nanny /*au pair*, in-home care, mothers' help, babysitter (r)	Nanny, live-in caregiver, *au pair*, babysitter (X)

(R) Compulsory regulation; (r) Voluntary/optional registration; (X) Not regulated through ECEC legislation

Based on the scope of policy definitions and terminology across countries, it is proposed that in-home child care refer to all forms of non-parental child care provided in the child's home, whether by nannies, professional in-home carers, *au pair*s, babysitters or migrant domestic workers who also care for children. This complexity of defining the scope of in-home child care contributes to the challenges of analysing and comparing government involvement in in-home child care. Detailed examination, particularly in Chapter 5, analyses the complexities and inconsistencies presented in Table 1 with respect to how they are funded and regulated differently.

Employment patterns, ECEC usage and the care workforce

Across most Western countries, including Australia, the United Kingdom and Canada, the number of children using formal and informal care, and the amount of care they use, is increasing as more women enter or return to the paid labour force, and many work longer and/or more irregular hours than previously (Australian Bureau of Statistics, 2008; Cleveland, Forer, Hyatt, Japel, & Krashinsky, 2008; R. Smith et al., 2010).

In Australia, maternal employment in families with children 0 to 5 years increased from 30 per cent to 56 per cent between 1981 and 2011 (Baxter, 2013, p. 6). In the UK, the employment rate among women with a child aged 0 to 2 years increased from 38.3 per cent to almost 57 per cent between 1992[2] and 2012, and from 47.3 to 59 per cent for mothers with children 3 to 4 years (Thompson & Ben-Galim, 2014). And in Canada, between 1981 and 2011 the maternal employment rate increased from approximately 40 per cent to 65 per cent for mothers with a youngest children 0 to 3 years, and from approximately 47 per cent to 70 per cent between for mothers with children aged 3 to 5 years (for 1981 figures, see Organisation for Economic Co-operation and Development, 2005, p. 70; for 2011 figures see Organisation for Economic Co-operation and Development, 2014, LMF1.2).

At the same time that female and maternal employment has increased, there has been an increase in non-standard employment among men and women. Increases in non-standard work patterns can be linked to welfare state restructuring and the decline of the full-time permanent worker model. 'Non-standard' employment characterises various working arrangements that include part-time, casual, temporary, seasonal, and self-employment. These employment categories are not mutually exclusive, and the definitions vary across countries. We do know, however, that there has been an increase in non-standard employment across developed countries since the early 1990s (Krahn, 1995; Mangan, 2000; Vosko, MacDonald, & Campbell, 2009). This trend is often

---

[2] Comparable data not available for earlier years (Office for National Statistics, 2013).

linked to the rise of the '24-hour economy', particularly among female-dominated service industries (Presser, Gornick, & Parashar, 2008). In Australia, in 2007, nearly 60 per cent of all couple families one or both parents usually worked hours between 7pm and 7am; in 41 per cent of families, one or both parents worked shift work and in 15 per cent of families one or both parents worked weekends (Australian Bureau of Statistics, 2009). In the UK, a survey found that only 35 per cent of employees worked a standard week, defined as Monday to Friday between 8am and 6pm (Statham & Mooney, 2003). Another study found that 80 per cent of working fathers worked atypical times, and half of working mothers (lone and couple) worked atypical times (Barnes, Bryson, & Smith, 2006, p. 34). In Canada, in the late 1990s, one-third of workers were in non-standard jobs, an increase from less than a decade earlier (Rapoport & Le Bourdais, 2008; Strazdins, Korda, Lim, Broom, & D'Souza, 2004).

Non-standard employment among families with young children can reflect a positive choice by parents to work more flexible hours in order to maximise parental care. The absence of affordable formal or stable informal ECEC may also prevent families from taking up standard employment (Le Bihan & Martin, 2004; Rutter & Evans, 2012). In the latter circumstance, non-standard work can contribute to demand for more flexible ECEC options, including in-home child care (Rutter & Evans, 2012).

Maternal employment has increased in all three countries since the 1970s and usage rates for formal and informal ECEC have also increased. However, attendance in formal ECEC services has not kept pace with increasing maternal employment. Table 2 (below) shows the mismatch between mothers' workforce participation and children's enrolment in formal ECEC. These figures suggest a large number of families, particularly with children 0 to 3 years, use informal, unregulated options. As with trends in non-standard employment, for many, informal care may be a positive choice, such as grandparent, partner, or other relative. In other circumstances, there may be few alternatives. The large proportion of children 3 to 5 years in formal ECEC reflect the prevalence of part-time preschool and education focused programs that exist in each of the study countries. These programs are an important part of the story – especially as they are often viewed as complementary, rather than an alternative to other forms of care for this age group.

Table 2: Workforce participation of mothers by age of youngest child (2011) and enrolment rates in formal child care and preschool (per cent), by age (2010 or latest year)

	0 to 3 years		3 to 5 years	
	Workforce participation	Enrolment in formal ECEC	Workforce participation	Enrolment in formal ECEC
Australia	48.7	33.2	61.6[2]	80.1
United Kingdom	56.9	42	61.2	93.3
Canada *(Ontario)*	64.5 70.6[1]	22.5[1] (a)(b)	70.4 75.3[1]	47.3

(a)0 to 5 years
(b)This refers to the proportion of children for whom there is a regulated space (for Australia and the UK this is the proportion of children enrolled in formal ECEC)

Sources:
Organisation for Economic Co-operation and Development (2014, LMF1.2, PF3.2),
[1]Friendly, Halfon, Beach, and Forer (2013, Table 9)
[2]Baxter (2014)

It is difficult to compare participation in specific types of care because of the different terminology used (Table 1) and inconsistent approaches to data collection (Organisation for Economic Co-operation and Development, 2014, PF3.2). In addition, the age of compulsory education differs across the countries. Some things we do know about the use of informal and in-home child care in the three study countries:

- In Australia approximately 38 per cent of children 0 to 5 years use informal care and approximately 5 per cent used informal care a by non-relative (Australian Bureau of Statistics, 2011).

- In England the annual survey of parents found that in 2012-2013 3 per cent of 0 to 4 year olds used care by a nanny, au pair or other non-relative carer (formal or informal) (Department for Education (UK), 2014). However, the Office for National Statistics found that in 2004, the proportion of children cared for by nannies or au pairs were much higher, at 10 per cent for children 0 to 3 years, and 14 per cent from children aged 3 to 6 years (Organisation for Economic Co-operation and Development, 2005, Table 4.3).

- In Canada almost 18 per cent of children used unregulated, non-relative care in 2004-05. This includes unregulated care in the home of the caregiver. Slightly more used unregulated relative care (Cleveland et al., 2008).

Data on the in-home child care workforce is equally patchy and incomparable. In Australia, workforce surveys often group formal In Home Care workers (that is, workers employed under the formal In Home Care program) with the family day care workforce or the occasional care workforce. The 2011 National ECEC Workforce Census separated In Home Care and reported there were approximately 1000 In Home Care workers, which represented less than 1 per cent of all formal ECEC workers. However, this figure excludes in-home child carers registered with the Department of Human Services (separate to the formal In Home Care program), as well as all informal in-home child care workers. The Australian Bureau of Statistics estimates there are up to 30,000 paid carers in the home, which includes nannies and other in-home carers, but also grandparents (Australian Nanny Association, 2013). A UK study on the nanny workforce used the General Household Survey and estimated there were 63,000 nannies and mothers' help (Social Issues Research Centre, 2009, p. 20). To put this in context, the 2006 Childcare and Early Years Provider survey reported a total of 347,300 staff working in the formal childcare and early years sector[3] (Brind et al., 2011). In Canada, in the 2006 census there were almost 70,000 babysitters, nannies and parent helpers. This total represented over 20 per cent of the total early childhood education and care workforce (Child Care Human Resources Sector Council, 2010).

The next section provides a brief overview of the broader ECEC policy context in Australia, the UK and Canada, followed by sketch of government support for in-home child care in each country.

Policy overview
The ECEC policy landscape in Australia, the UK and Canada differs across all types of ECEC. The prevalence of different types of ECEC varies, as do the funding mechanisms and regulatory frameworks. In Australia, ECEC services are legislated by a

---

[3] Includes Full-day childcare, sessional childcare, after school childcare, children's centres, childminders, nursery and reception classes, nursery schools.

national framework, the National Quality Framework for Early Childhood Education and Care, which was fully implemented in 2013. The national regulation covers long day care (LDC), family day care (FDC), preschool and outside school hours care (OSHC). The major Commonwealth subsidies (Child Care Benefit and Child Care Rebate) are available to families using 'approved' ECEC. Approved services include those under the National Quality Framework (except preschool), plus occasional care (OCC) and the In Home Care program.

In the United Kingdom, the Office for Standards in Education, Children's Services and Skills (Ofsted) is responsible for regulating and inspecting ECEC services. It is mandatory for centre-based nurseries, preschools and childminders to register with Ofsted, while Home Childcare (including nannies and *au pair*s) and playgroups (among others) are part of the voluntary register. The childcare element of the Working Tax Credit (WTC) and employer childcare vouchers are available to eligible families (who meet the income and work test) using Ofsted registered care. Three- and four-year olds (and some two-year olds) are also entitled to 15 hours of ECEC in centre-based settings, including nurseries, preschools and some childminders.

In Canada, there is no national legislation or regulation for ECEC. Instead ECEC is regulated by provinces and territories. In the province of Ontario, the focus of this research, the Day Nurseries Act[4] regulates centre-based and home-based care (in the home of the caregiver); however unregulated home-based care is permitted. Provincial means-tested subsidies are available for families using Licenced Centre-based Child Care and Licensed Home-based Child Care. Kindergarten is delivered at the provincial level and in Ontario full-day kindergarten is available for 4- and 5-year olds. At the federal level, the Child Care Expense Deduction (CCED) and Universal Child Care Benefit (UCCB) provide minimal financial assistance for families using any type of

---

[4] At the time of writing, the Child Care and Early Years Act 2013 is under review to repeal the Day Nurseries Act. This is discussed further in Chapter 4.

formal/informal or regulated/unregulated care. Table 3, below, indicates the total amount of expenditure on child care and early education as a proportion of GDP in 1998, 2004 and 2009, respectively. It should be noted that there are limitations to cross-national comparisons of GDP expenditure, as there are complex considerations about what types of care and education are included. For example, expenditure on kindergarten is not included in the case of Canada, while expenditure on reception classes for 4 year olds is likely included for the UK (Penn & Lloyd, 2013, p. 19). Since the OECD offers comparable figures, it is still worth pointing out that Australia and the UK increased spending, Canada spent a similar proportion over the ten year period. It should be noted that spending in OECD average in 2009 was 0.7 per cent.

Table 3: Expenditure on child care and preschool as a percentage of GDP, 1998, 2004, 2009

	1998	2004	2009
Australia	0.3	0.4	0.6
United Kingdom	0.6	0.8	1.1
Canada	0.2	0.2	0.2

Source: Organisation for Economic Co-operation and Development (2014, PF3.1)

However, as a number of scholars point out, it is not only the amount of expenditure that matters, but the details and structure of spending (Baker, 2006; Jenson & Sineau, 2001). Government involvement in funding and regulating ECEC is designed to address issues of quality, affordability and accessibility of ECEC services. ECEC policy is therefore likely to impact the options and shape the decisions of families. For example, when public subsidies are available for in-home child care, it may be an affordable option for more families. However, if there is not adequate regulation this option might not be accessible to families that would benefit the most, and may not be of adequate quality.

Market mechanisms are increasingly adopted in liberal (and other) countries, and can be designed to exclude certain types of care from the formal sector through regulation and monitoring; however market mechanisms can also be designed to integrate previously informal or 'grey market' services into the formal mixed market of care (Lister et al., 2007; Morgan, 2005; Warner & Gradus, 2009; Williams, 2010a). As mentioned,

informal care can be "a positive choice" for parents (Bryson et al., 2012; Land, 2002; Land & Himmelweit, 2010; Rutter & Evans, 2011; Skinner & Finch, 2006; Vincent & Ball, 2006); however "rewarding, regulating and sustaining providers of informal care raise complex and controversial issues" (Land, 2002, p. 13). In particular, government involvement in rewarding and regulating informal providers (in or outside the home) may blur the line between public and private responsibility for such care work. A brief overview of the way each of the study countries funds and regulates in-home child care – through ECEC and migration policy – is presented below.

- In Australia, a small amount of in-home child care is provided through a targeted, formal ECEC arrangement, called In Home Care. Families' accessing the In Home Care program are eligible for the same subsidies (Child Care Benefit and Child Care Rebate) as families using other approved centre- and home-based ECEC, namely long day care and family day care. Subsidies are available at a (much) lower rate for children using other forms of registered care, such as by grandparents and nannies. There are no formal migration schemes that recruit care workers into the home; however Working Holiday visas allow young people to work in private homes for up to 6 months.

- In the UK, nannies and other in-home child care workers may register with the regulating agency, Ofsted (in England) and with the Care Inspectorate through a Childcare Agency (in Scotland). Families using registered in-home child care workers are eligible for income-tested tax credits and employer sponsored childcare vouchers. These are the same funding mechanisms that are available for centre-based (day nurseries) and home-based care (childminders). The expansion of the European Union in 2004 increased the number of young women from Eastern Europe moving to the UK to work as *au pairs*. A separate Youth Mobility scheme also allows young people from non-member nations to work as *au pairs* in private homes.

- In Canada, families receive the $100/month Universal Child Care Benefit (UCCB) and can claim the Child Care Expense Deduction for child care expenses regardless of the type of care used. The Live-In Caregiver scheme

offers a formal route for recruiting migrant care workers to live in the family home to care for children, the elderly and people with a disability. Some provinces, including Ontario, provide additional subsidies for families on welfare assistance using informal child care to facilitate employment.

In the three liberal countries chosen for this study policy mechanisms have been introduced in the last two decades (and earlier in Canada) to support and facilitate the use of different forms of in-home child care. The funding and regulation of in-home child care is receiving increasing attention in policy and public debates, however limited academic attention has been given to the details and implications of different policy mechanisms. Little is known about the policy trends and rationales for this type of care, and how different policy domains intersect with ECEC policy reforms and movements.

Why in-home child care?

Governments in all three liberal countries have introduced tax credits and/or fee subsidies for in-home child care, at least in limited circumstances. The details of these policy mechanisms, the rationales for policy reforms, and the implications for families and care workers are explored in the body of the thesis. It is also important to situate this analysis within broader social and political contexts. Early childhood education and *care* as well as *migration* and *employment* are relevant policy areas for this study on in-home child care. Local, national and international policy contexts are relevant to this research because for each policy area, there are shifts and movements across domestic and global boundaries. There has been an 'internationalisation' of ECEC policy (Mahon, 2010b; White, 2011b) as new ideas about the importance of investment in early education, the knowledge economy, and workforce participation are shared and transferred across borders. New ideas about investment in human capital also promote active labour market policies, which contribute to the restructuring of the labour force. In particular, the shift to casualisation and non-standard work is seen to enhance productivity and countries' tax income. Gaps in the supply and demand in local labour markets expand employers' and governments' attention to global recruitment strategies. In many cases, migrant care workers move across borders to fill the gap in supply of workers willing to work in lower-paid jobs, many of which are part of the growing 24-hour economy. This movement of migrant workers is particularly apparent in the care

workforce. This applies to formal, centre-based care work, such as nursing and aged care, and also child care. It also includes the recruitment of migrants (mostly female) to work in domestic settings to provide care for children, the frail and elderly and to perform other cleaning and household tasks.

Much of the demand for migrant care and domestic workers is driven by the restructuring of policy funding, introduced earlier, and a shift to use subsidies and tax measures. These types of market mechanisms are consistent with liberal ideas about individualism and the free market. In policy rhetoric, demand-side mechanisms facilitate choice in the market. The concept of 'choice' is central to many governments' rationale for adopting vouchers, demand-side subsidies and tax measures for the provision of care, including ECEC. Vouchers and tax measures also sit comfortably with the rise of consumerism, where users (consumers) are free to purchase care within their local markets. However, as mentioned above, employment regulations and migration policy also shape the supply and demand of care workers locally and globally.

Many of the trends described above are often linked to a shift toward a 'social investment' approach to social policy, which is prominent among liberal countries and other regimes types, as elaborated in the next chapter. A liberal social investment approach to social policy emphasises human capital, and is relevant to investments in children and women alike. It is viewed that investment in children, for example through the provision of high quality ECEC, has positive outcomes for the child in the future. As the same time government investment in flexible child care (and other forms of domestic work) can enhance women's productivity in two ways. First, the hiring of in-home care helps to reconcile work and care responsibilities for skilled workers (mothers), who are then able to increase their economic contribution through workforce participation. Second, the provision of child care and domestic work in the home through formal policy measures creates legitimate jobs for (generally) lower-skilled female workers (Morel, 2012). Under this approach more vulnerable workers increase their earnings, overall employment rates increase and, in theory, public expenditure on welfare benefits is reduced. Government involvement in in-home child care is therefore relevant to a number of policy areas and debates: first, it is relevant to increased

international attention on the provision of high quality ECEC as a form of investment in children to improve their short-term wellbeing and long-term outcomes. Second, governments are interested in ways to boost employment, particularly among women and mothers, which requires flexible and affordable care (ECEC and elderly care) options to help reconcile work and care responsibilities. And, third, employment in the domestic sector opens up opportunities for lower-skilled workers, local and migrant, who might otherwise be unemployed or working in the informal economy. The focus of this research developed out of an interest in comparative ECEC policy; however, as will become evident, an examination of in-home child care policy must include all three dimensions.

To date, there has been little research exploring the rationales behind governments' support for in-home child care. Indeed, such support can appear perplexing given the strong government rhetoric in some countries about the need for increased 'social investment' through expenditure on high quality, universal ECEC services, generally assumed to be centre-based services. ECEC has gained a central position on liberal governments' policy agendas based on evidence of the benefits of increased public expenditure on high quality care. Much of the research evidence on ECEC policy is based on formal, centre-based care, with limited attention given to care provided in the child's home and other forms of domestic work. By extending the analysis beyond centre-based, mainstream ECEC this study addresses an important gap in this body of policy research. In an innovative way, this research also extends analysis to include migration as an integral part of policy that intersects with governments' funding and regulation of ECEC.

Although not typically discussed in analyses of child care policy, immigration policy that facilitates the recruitment of migrant domestic care workers can increase the supply of more affordable care labour. However, there are concerns that within an unregulated market for care, there may be implications for the quality of the care provided and the working conditions for the care workers. Government involvement in in-home child care therefore has implications for quality and affordability for care users, and can also reinforce gender and income inequalities (Baker, 2006; Lewis, 2008; Williams, 2004a, 2012b). The consequences of government involvement in ECEC are therefore not

limited to gender equality issues for the family (mother); they also extend to care workers, where markets that facilitate the employment of in-home care workers stimulate demand for low-wage migrant workers (Williams, 2010b; Williams & Gavanas, 2008). The issues and complexities introduced above are explored in detail in the remainder of this thesis, as outlined in the next section.

Aims, analytical approach and chapter outline

The aims of this study are based on four overarching questions (detailed in Chapter 3):

1. Is there a relationship between welfare state restructuring and government support for in-home child care?

2. How do governments support in-home child care in Australia, the UK and Canada?

3. What are the implications of in-home child care policy for families and care workers?

4. Why have Australia, the UK and Canada developed diverging approaches to supporting in-home child care?

The remainder of this chapter provides an overview of the structure of the thesis, outlining how the chapters address these questions. Chapter 2 provides a review of the literature analysing how welfare state restructuring has repositioned in-home child care within the fields of ECEC and social care and, in particular, it examines what has been written about in-home child care in this context. The literature review is split into five sections. The first explores the origins and histories of ECEC in each country, with particular attention to movements and actors that support and oppose different forms of ECEC. Second, contributions from welfare, gender and care regimes scholars are outlined in relation to the classification of care. Third, and related to the previous topic, the restructuring of care responsibilities are discussed as part of broader welfare state processes, including marketisation, privatisation and commodification. This includes literature on the intersection of care and migration regimes. Fourth, scholarship on the role of frames and paradigms for analysing welfare state change is presented, including examination of how frames and rationales for thinking about ECEC have been talked about in the literature, specifically as part of a 'social investment' discourse. Finally,

these broader trends in welfare state change and classifications are looked at in relation to how they affect the design of ECEC policy and programs. The implications of policy design for children, families and care workers are considered.

Chapter 3 outlines the theoretical and methodological approach that underpins this study. Drawing on theories of institutionalism and welfare regime typologies, the concept of 'care culture' is proposed as a way to fuse the strengths of these two theoretical literatures. Care culture, it is argued, accounts for structural and normative elements that are central to cross-national analysis of care policies. In particular, care culture captures the interaction between policy mechanisms, new policy ideas, and embedded assumptions about appropriate forms of child care. This, in turn, shapes and helps to explain care practices. The qualitative methods used – policy analysis, discursive analysis, and key stakeholder interviews – are outlined.

Next, Chapter 4 uses a mix of primary and secondary sources to present a comprehensive account of ECEC policy development from 1970 to the mid-1990s in each country. The first part of this chapter draws mostly on secondary analysis to provide an account of different movements for child care and the actors involved in advocating and resisting the development of universal ECEC. The second part of the chapter builds on the first part to document how in-home child care specifically was talked about by different government and non-government groups involved in the ECEC sector over this time period. A combination of secondary sources and archival policy documents are used, and supported by data from interviews with key stakeholders. Chapter 5 provides a comprehensive account of the policy details that shape the supply and demand of in-home child care in each country. Based on a structural approach to analysis, the different funding mechanisms, eligibility criteria, regulatory requirements and migration rules are detailed to compare and contrast how in-home child care is supported by governments in each country. The second part focuses on the intersection of these policy mechanisms to highlight some tensions and inconsistencies in governments' approaches to supporting in-home child care.

Chapter 6 builds on discussion from the previous two chapters to illustrate how and why policy changes in the 1990s restructured government support for in-home child care (as

detailed in Chapter 5). In doing so it discusses how the rationales and ideas driving ECEC shifted from debates about gender equality in the 1970s (Chapter 4) towards a 'social investment' approach that emphasises human capital. Drawing extensively on primary policy documents and interviews with stakeholders Chapter 6 argues that government support for in-home child care is underpinned by different sets of social investment rationales, but also that in-home child care underpinned by common rationales can, in practice, operate very differently.

Chapter 6 illustrates how the ideas and rationales (Chapter 6) that promoted the restructuring of ECEC and care policies (Chapter 5) have implications for families and care workers. In contrast to the objectives of the 1960s and 70s women's movements (Chapter 3) that called for child care as a means to achieve gender equality in the home and the workplace, the liberal social investment approach (Chapter 6) places greater emphasis on promoting women's workforce participation in line with economic objectives for the family and cost savings to government. This chapter argues that the intersection of care and migration policy has implications for families (mothers and children) and care workers that cut across gender, class/income and race/migration. It then proposes that the key debates around in-home child care in each country are reflective of different gender, class and race/migration issues, which are arguably explained by different assumptions in each country about who should care for children and how care should be provided. It should be noted that the analysis in this chapter focuses on the most salient issues: gender in relation to mothers and care workers; class/income in relation to parents and children; and race/migration in relation to care workers. Another important implication for children is the impact of policy on the *quality* of care. This issue is raised in Chapter 7 in relation to different policy debates about in-home child care, however is not the focus of the policy analysis. This is detailed further at the beginning of Chapter 7.

Chapter 8 shifts the focus to the care worker. First, it outlines differences in employment structures in the three countries to show how the employer-employee relationship is central to understanding exploitation and hierarchies that exist across gender, class and race/migration lines. It uses Williams' recognition framework, based on the elements of visibility, voice and value, to illustrate that the inequalities created

through the interaction of care and migration policy (Chapter 7) have implications for the recognition of in-home child care workers.

A final, concluding chapter draws together the findings from the five main chapters. It returns to the overarching aims and research questions (detailed in Chapter 3), and points to the role of 'care culture' to explain differences among these three liberal countries. In doing so, it illustrates how different origins, policy details and discourses contribute to different cultures of in-home child care that developed since the 1970s and which operate today. It argues that both the structural and normative aspects of care culture have implications for families and care workers. These findings illustrate how, by using in-home child care as a lens for comparison, the concept of care culture contributes to literature on welfare typologies and different care regimes. Three policy considerations for the design and delivery of in-home child care are proposed to provide best practices for children, parents and care workers. Finally, research gaps and areas for further examination are identified.

Chapter 2 : Restructuring ECEC – In-home child care in the literature

A thorough analysis of in-home child care requires attention to a number of overlapping bodies of literature, which are linked by a common pattern of welfare state change. Welfare state restructuring since the 1970s has reshaped the role and responsibilities of government, generating research and debate across the social policy field. Early childhood education and care (ECEC), as well as the care domain more broadly, is increasingly identified in scholarly debates about the restructuring of funding and regulatory mechanisms in the provision of welfare services. For example, rather than provide services, governments increasingly provide tax rebates or cash benefits to assist with the costs of care services, including child care. Common features of policy change include decentralisation to local governments, the contracting out of services to private providers, shifts from direct to indirect funding through vouchers and tax credits and from supply-side to demand-side funding (Bonoli, 2005; Clasen & Siegel, 2007; Salamon & Elliott, 2002). These changes reflect the process of marketisation, whereby services are purchased by service users, constituted as consumers, through a mixed market of public and private providers. Some of these changes, particularly the introduction of individualised funding mechanisms and active welfare policies, have been explained as part of what has already been referred to as a 'social investment' approach to social policy. For example, Morel et al. (2012) explain the shift to social investment as an idea that policies should aim to

> prepare'[sic] the population to prevent certain social and economic risks associated with changing employment conditions and family patterns, and to minimise the intergenerational transfer of poverty, rather than at 'repairing' through passive income maintenance schemes after the risk has occurred (Morel, Palier, & Palme, 2012, p. 9)

The details and consequences of welfare state restructuring are central to analysis of early education and care policy, evident across various scholarly disciplines. As governments responded to demographic pressures and demands from the women's movement for greater public responsibility for child care in the 1960s and 1970s, political science, welfare state and feminist scholars compared and theorised governments' responses to develop explanations for cross-national variation, including the division of care responsibilities across the public and private domains. A new body

of literature emerged in the 1990s in response to new ideas about social policy and welfare state restructuring. Research related to restructuring of care responsibilities centre on social stratification, including issues of gender, class and race, which include sociological, feminist and political economy scholars. These issues are mitigated and exacerbated by government funding and regulations surrounding ECEC services.

The literature reviewed for the thesis was sought through the UNSW Library databases, using various search strategies and key words. The search applied variations of the key terms (i.e. child care, childcare, early childhood education) in combination with other key terms and concepts (including markets, migration, history, policy, models, informal). These searches were focused on the three country studies, but also extended to cross-national studies and international research where the concepts and frameworks (i.e. formalisation, commodification) were relevant to my research topic. Databases and grey literature (including Google Scholar) were also used to search for any studies specifically on nannies and in-home child care. The analysis of the literature relevant to this thesis is organised into five areas, with particular attention accorded to in-home child care within each:

1. Origins of ECEC: Early movements and policy pressures
2. Welfare, gender & care regimes
3. Conceptualising care responsibilities
4. Ideas and rationales for ECEC
5. Policy design and ECEC outcomes

Origins of ECEC: Early movements and policy pressures

The care and education of young children sits prominently within the policy debates of most Western countries (Jenson & Sineau, 2001; Michel & Mahon, 2002; Organisation for Economic Co-operation and Development, 2005, 2006; Scheiwe & Willekens, 2009; UNICEF, 2008). We know from recent policy developments and contemporary sources that acceptance of ECEC, or child care, as a public responsibility is relatively recent for liberal countries. Previously, the care of young children was a private responsibility left to the family, with the exception of services for children from the most vulnerable families. This section reviews key themes and arguments presented by scholars from

diverse disciplines and perspectives, including political science, sociology, feminism and early childhood education and care.

The development of ECEC goals, instruments and norms emerged and developed under different cultural, social, and political contexts in Australia, the United Kingdom and Canada (Baker, 2006; Brennan, 1998; Brennan & Mahon, 2011; Friendly, 2000; Jenson & Sineau, 2001; Mahon, 2009a; O'Connor et al., 1999; Penn, 2007; Randall, 1996; Timpson, 2001). The directions and goals of movements were largely shaped by collective beliefs, political and advocacy mobilisation and negotiations about what is best for mothers and children (Michel & Mahon, 2002). For example, trade unions, femocrats, and lobby groups played a significant role in Australia; trade unions and local employers influenced the trajectory of child care in the UK, and federal-provincial negotiations are identified as a key factor in progress and retreat of child care in Canada (Brennan, 2002; Mahon & Phillips, 2002; Randall, 1995, 1996). The feminist movement played a pivotal role in advocating for women's right to work and the expansion of child care in all three countries; however the way these movements played out, the actors involved, and their various achievements diverged in critical ways (Baker, 2006; Brennan, 1998; Cleveland & Krashinsky, 2001; Friendly, 2000; Mahon, 2005; O'Connor et al., 1999; Randall, 1995). These are presented below for Australia, the UK and Canada, respectively.

Australia stands out among the three study countries for the development of a nationally consistent, community based system in the 1970s, which provided subsidies that assisted children across all income levels, not only the most needy. In the 1970s the Australian feminist movement succeeded in advancing the establishment of a network of community-based services to meet the needs of both children and mothers (Brennan, 1998; Davis, 1983). This is in contrast to the UK and Canada, discussed below, where some feminist groups were ambiguous about whether public, universal child care should be a priority of the Women's Liberation Movement (Coote & Campbell, 1987; Timpson, 2001). In Australia, the labour movement made greater advancements, backed by Labor Party support, and child care advocacy organisations were successful in preventing the expansion of for-profit child care (Brennan, 2002; Mahon & Phillips, 2002). To the dismay of child care advocates, particularly the community child care

movement, much of the system was dismantled under the Labor Government that came to power in 1983 and then by the Liberal/National Coalition in the 1990s. Brennan's book on the history and politics of child care in Australia shows how feminist demands for community-based child care were eroded by fiscal demands. Instead, 'motherlike' care (family day care) was promoted as the cheaper alternative and, potentially more importantly, fitted with ideas about the appropriate form of care for young children (Brennan, 1998, 2002; Davis, 1983; Jones, 1987). Furthermore, Brennan explains how the Government's reluctance to accept public responsibility for care, in contrast to education, shaped the ideological acceptance that care should be a private responsibility. This came in the form of care by family members, but also opened the door to private providers and, in the 1990s, commercial enterprises. As in Canada (discussed below), the federal structure in Australia also influenced the success of child care interest groups and the feminist movements more broadly (Brennan & Mahon, 2011). However, feminists in Australia found opportunities to work with the bureaucrats at the state and federal level, opposed to in the UK where progress was more successful at the local level, and Canada where advocates faced greater opposition at the provincial and federal levels. Further analysis of the origins and actors advocating for and against national ECEC policy is presented in Chapter 4.

The UK's experience was arguably more piecemeal, and occurred a decade later than Australia (and Canada). Vicky Randall suggests the delayed progress made by the feminist movement was in part due to the inability to find an "ideologically acceptable framework of ideas" to express the need for public child care provision (Randall, 1996, p. 178). Other feminist scholars explain how in the early days of the Women's Liberation Movement there was ambiguity about what feminist demands for child care should look like. While 24-hour nurseries were one of the four demands of the British women's movement in 1970 feminists were divided as to who should be responsible for this care – parents, employers, or the state? (Coote & Campbell, 1987, pp. 33-35). As a result, local feminist movements worked with local government to establish community-based child care (Lewis, 2013b; Randall, 2004). Fragmented interests in the expansion of child care led to the playgroup movement led by middle-income families seeking early education for their children; the promotion of low-cost childminders for mothers who 'needed to work'; and day nurseries for vulnerable children where parents

were deemed unsuitable carers (Penn, 2009c). The development of child care therefore varied across local areas, and availability was largely driven by local feminist groups and female representation on local councils (Coote & Campbell, 1987; Randall, 2004). Full-day provision for the under 5s was viewed as a family responsibility for all but the most needy (Lewis, 2013b; Randall, 1995). While traditional values of motherhood and lack of unity amongst the feminist movement hindered earlier development of high quality child care, more unified efforts in the 1980s were met with resistance from the central government, including cuts to local government (Lewis, 2013a). By the 1990s, targets set by the European Commission for women's employment were arguably as important in getting child care on the national government agenda as the demands by the feminist movement (Lewis, 2003; Lewis & Campbell, 2007a; Lister, 2004). Additionally, the government's role in relation to day nurseries (but not nursery education) was primarily as coordinator, and not provider (Randall, 1996, 2002).

In Canada, there is consensus amongst scholars that the lack of federal unity created barriers to the expansion of regulated child care. Examination of policy developments and the actors and movements that shaped reform brings to light the complexity of the dynamics across the national, provincial and municipal levels. In the case of the province of Ontario, where this study focuses, political science scholars show that municipal involvement in child care funding and provision is an important part of the story (Mahon, 2006b, 2007). As in the UK, the ambivalent attitude of the women's movement to child care led to an "autonomous" child care movement that advocated the role of child care in promoting women's employment and equality (Timpson, 2001). Advocacy groups at the provincial and municipal level were critical to development at the national level, as explained by policy advocates and political scientists (Friendly, 2000; Mahon, 2006b, 2007). Despite some promising moments, child care advocates did not succeed in establishing a national or provincial child care program that rested on principles of universality and not-for-profit provision. The inability to develop a national, or provincial, program is explained by the dominance of conservative ideologies about motherhood (Teghtsoonian, 1993, 1995; Timpson, 2001); a tension between liberal views about employment and child care (Timpson, 2001); fiscal austerity in the 1980s and 1990s driven by conservative and neo-liberal ideas across party lines (Tyyska, 2001) and fragmentation in advocacy groups' commitment to not-

for-profit provision (Friendly, 2000; Friendly & Rothman, 1995; Mahon & Phillips, 2002). Tyyska illustrates how the presence of 'insider' and 'outsider' supporters on the left, centre and right political spectrum and also advocacy groups' approaches (identified as 'conflict' and 'consensus' politics) created barriers to achieving a national child care program in Canada (Tyyska, 1994, 1998). Similarly, White argues that advocacy groups commitment to the 'ideal' universal system and rejection of a 'half loaf' of bread in the late 1980s cut off opportunities for later progress (White, 2001). The political conflicts and dynamics among interest groups were compounded by systemic challenges associated with a federal structure (Friendly, 2000; Mahon, 2000, 2007).

A review of the histories and politics of ECEC in each country since the 1970s reveals similarities and differences in the movements, actors and reforms supporting (and hindering) the development of ECEC policies. In particular, this literature provides a strong foundation for understanding how governments intervened in different types of ECEC through funding and regulation. Government support for ECEC developed differently across the various types and settings of ECEC, namely preschool or kindergartens, day care centres, and forms of home-based care. Research on ECEC policy legacies in these three liberal countries is informed by both theories of institutionalism and comparative welfare regimes, which are prominent in comparative ECEC policy research (Baker, 2006; Jenson & Sineau, 2001; Mahon, Anttonen, Bergqvist, Brennan, & Hobson, 2012; Michel & Mahon, 2002; O'Connor et al., 1999). Centre-based formal care was central to the feminist calls for universal child care through the 1960s and 1970s and, since the 1990s centre-based 'early education' has been central to the promotion of liberal countries' social investment approach to social policy (introduced later in this chapter and detailed in Chapter 6). Feminists demands for gender equality in the 1970s and, later, calls for equal opportunity in the workforce, were key drivers for the restructuring of care responsibilities between family, state, private and community sectors.

In-home child care is largely absent from comparative ECEC research, and is rarely acknowledged in social policy literatures as a form of 'formal' ECEC. Sociologists and gender scholars in Europe have given greater attention to the informal domain, and the

role of normative values and acceptance of new policy ideas (For example Sipilä, Repo, & Rissanen, 2010). Comparative histories of informal and familial child care, and their relationship to formal ECEC, have been conceptualised in a European context to illustrate how origins and embedded values impact individuals' attitudes and choices of care arrangements (Kremer, 2006, 2007; Morel, 2007; Padamsee, 2009; Pfau-Effinger, 2005c; Van Oorschot, Opielka, & Pfau-Effinger, 2008; Williams, 2008, 2012b; Williams & Gavanas, 2008). These findings contribute important conceptual and analytical approaches to analysing the restructuring of in-home child care – one that incorporates culture as a way of explaining the interaction between policy structures, new policy ideas and embedded norms about the division of care responsibility. This body of literature is also central to the theoretical approach adopted for this study, namely theories of institutionalism and comparative welfare regimes, which are introduced later in this chapter and detailed in Chapter 3.

The movements and ideas promoting more informal, arrangements provided in the caregiver's or child's home are given little attention in scholarly literature on national ECEC policy legacies in liberal countries (For the UK see Bryson et al., 2012; Holloway & Tamplin, 2001; Land, 2002; Rutter & Evans, 2011; Skinner & Finch, 2006). We do not know how the story of in-home child care in these three countries fits with the demographic pressures, the women's movement and other actors' promotion of different forms of ECEC. This is not to suggest that research on in-home child care does not exist, but rather this area of research on nannies and *au pair*s is written about as a form of domestic work, rather than as part of comparative or historical ECEC policy analyses. The third section of this chapter builds on this body of research to identify an area for cross-national research that considers how the restructuring of care responsibilities is shaped by both care and migration policies. First, literature on care regimes and classifications are presented in relation to broader welfare state typologies and restructuring of gender roles and responsibilities.

Welfare, gender and care regimes
ECEC crosses the public and private spheres; services can be provided in and outside the home, across the formal and informal domains; and delivered by a mix of family, state, private and community providers. These categories are used to describe how care

is delivered; however welfare state restructuring shapes responsibilities for care provision in complex ways. The way governments fund and provide ECEC, and other human services, contributes to the development of welfare regimes typologies based on who funds services, and how they are funded and delivered. This section introduces literature on comparative welfare regimes (detailed further in Chapter 3) from a political science and sociological perspective and, arguably at the centre of this study, it presents critiques from gender and care scholars. In doing so, illustrates the significance of welfare typologies for thinking about care classifications, and the processes involved in restructuring care responsibilities across the family, state, private, and community sectors. This discussion is closely linked to the next section in this chapter that draws on the processes of marketisation, commodification, privatisation, re-familisation, and commercialisation to conceptualise the restructuring of care responsibilities.

Esping-Andersen's seminal work (1990) on the three worlds of welfare capitalism (social democratic, neo-liberal and corporatist) received considerable attention for its classification of welfare regimes. This review does not discuss this work or its critiques in detail; however it is important to note the foundational significance of Esping-Andersen's work and its relation to other welfare regimes scholarship. His typology received criticism for the limited attention given to unpaid care work and the implications for gender inequalities (Baker, 2006; Clasen & Siegel, 2007; Lister et al., 2007; Michel & Mahon, 2002; Sainsbury, 1996). For example, Maureen Baker states that Esping-Andersen's typology is

> somewhat blurred when funding for care is examined, and especially
> the way states draw the line between private and public responsibility
> for the care of very young children (Baker, 2006, p. 49).

Using such critiques as a point of departure, gender scholars' examination and conceptualisations of care policies in liberal welfare states (and other Western countries) illustrate the complex and dynamic relationship between the state, market and family (Daly & Lewis, 2000; Fraser, 1994; Jenson & Sineau, 2001; Lewis, 2009; Lister et al., 2007; Meyers & Gornick, 2003; Michel & Mahon, 2002; O'Connor et al., 1999).

Policy restructuring and new ideas about gender roles shifts the responsibility for care across the public/private and informal/formal domains. Even before 'welfare regimes'

typologies were established as an analytical framework, scholars wrote about gender relations and how social policies shaped the division of paid and unpaid work through structural assumptions about gender and care responsibilities. The clear separation between public (state and society) and private (domestic) domains identified in early typologies distinguished between men's and women's work, including the gender roles implicit in welfare state structures. And, while the 'liberal' type was not explicit before the 1990s, family policies and wage structures implicitly shaped values and gender (and other) inequalities between paid and unpaid labour (Land, 1978; Williams, 1989).

The classifications and typologies developed by scholars through the 1990s and 2000s contributed new frameworks for comparing and measuring welfare state change post-WWII. Using the male breadwinner model as a starting point of 'traditional' welfare states, sociologists interested in the relationship between gender, social policy and the welfare state introduced and adapted alternative frameworks for analysing the way welfare states supported women's unpaid caring and paid work responsibilities through cash benefits and services (Daly & Lewis, 2000). For example, Diane Sainsbury identifies how welfare states support gender based on women's entitlements as wives, mothers/caregivers, and workers (Sainsbury, 1996). Walter Korpi's (2000) classification proposes that a welfare state that offers a 'dual-earner' model supports women's participation in the paid workforce, in combination with parenthood, through policies such as publicly-funded child care. In contrast, a 'general family support' model encourages mothers to stay at home with young children by offering generous parental leaves and child allowances. When the state supports neither of these models (as in liberal countries), it is referred to as a 'market oriented gender policy' model – reflected by a mixed market of public and private funding and delivery (Korpi, 2000; Sjöberg, 2004). Jane Lewis proposed a typology for 'gender regimes' according to how governments encourage (or discourage) women's gender roles. She suggested governments provide weak, moderate or strong support for a male breadwinner model (Lewis, 1992). Later, Lewis (1997) revised her typology with the 'modified breadwinner' and 'dual-breadwinner' models as alternatives to the traditional male breadwinner model characterised by a "firm dividing line between public and private responsibility for caring work" (Lewis, 1997, p. 169).

Common to all these typologies is the distinction made between paid and unpaid work for the receipt of social benefits and services, and the relationship between financially dependent caregivers (mainly women) within the private sphere and (paid) workers in the public sphere. Despite Lewis's (1997) assertion that male breadwinner policy logic distinguishes between public and private care responsibilities, the public and private domains are blurred. 'Public' care can be publicly or privately delivered and 'private' care can be delivered by the family, the market, or a combination of these. As O'Connor et al. suggest,

> the mere absence of public provision of care does not tell us which private source – markets, voluntary organisation or families – will provide care (O'Connor et al., 1999, p. 30).

The case for examining further the division between public and private responsibility for care is also made by Jane Jenson (1997), who argues that welfare regime typologies must move beyond the division of unpaid work, paid work and welfare. She asks: Who cares? Who pays? And, how is the care provided? (Jenson, 1997, p. 186). By asking these questions, the distinctions within the private sector are made and the complex dynamic between public funding of private delivery is revealed.

The division between public and private domains is regularly noted as the key tenet of liberal welfare states. That is, while ideas of liberalism are evident in all three regimes, the classification of English-speaking countries as the liberal type denotes the "distrust of public policies and the role of the state" and the principles of less eligibility and voluntarism (O'Connor et al., 1999, p. 45). This separation is central to distinguishing the liberal type, but does not explain differences among these three liberal countries. For example, O'Connor et al. proposed that government policies support gender-neutrality in Australia, gender-difference in the UK, and gender-sameness in Canada. Their typology was informed by analysis of different policy areas affecting women in the mid-1990s – including abortion, child care and eligibility for other social benefits. In Australia, there was better child care provision than the other two countries to facilitate women's employment, however family benefits also situated women as dependents of their male breadwinners. In terms of child care and employment, the UK was categorised as gender-different because the responsibility for the care of young children

remained clearly a private responsibility (for women in the home), while men took on paid, formal responsibilities outside the home. Whereas, in Canada, while child care was always a private responsibility, it was more widely accepted to be contracted out to facilitate women's equal employment with men outside the home. Further discussion about 'varieties of liberalism' (Mahon, 2008) and how it informs the theoretical approach to the research and the selection of countries is included in the next chapter.

Child care, or ECEC, is analysed by scholars in reference to governments' support through funding and provision of formal versus informal and public versus private (family or market) care arrangements. As mentioned, these are not distinct categories: public funding can subsidise private providers; private providers can fall in the formal or informal domain; and informal arrangements can reflect commodification and familisation of care (Jenson & Sineau, 2001; Lister et al., 2007; O'Connor et al., 1999; Saraceno, 2011). The typologies and classifications presented by welfare regime theorists illustrate the challenges of comparing how policies shape and transform caring responsibilities for young children. By accounting for the complexities of paid and unpaid work, feminist critiques of the comparative regime approach contribute to our understanding of how embedded norms and gender roles shape attitudes about the proper provision of child care. Australia, the UK and Canada all fit within the liberal welfare regime and the current body of literature points to the need for further comparative analysis of the institutional trajectories of ECEC in order to explain current divergences in liberal countries' in-home child care policy across the broader care and ECEC domains. The next section presents further academic scholarship on concepts and processes to describe the restructuring and classification of care responsibilities. Both care and migration policy create complex and blurred categories and, as the discussion illustrates, these categories are not mutually exclusive.

Conceptualising care responsibilities

As mentioned in the previous section, the concepts of marketisation, privatisation, commodification, de-/re-familisation, and commercialisation (among others) are used by sociologists and political economists to explain how policy restructuring shifts care responsibilities across the public/private and informal/formal domains (Knijn & Ostner, 2002; Lewis, Campbell, & Huerta, 2008). First, defamilisation is central to the analyses

of gender related aspects of welfare state change (Baker, 2006; Hantrais, 2004), where defamilisation is a "process of unburdening the family" from care responsibilities (Clasen & Siegel, 2007, p. 11). Commodification is a second, and related concept, which refers to the inclusion in the market without formalisation, and delineates the process of moving care from the unpaid to paid labour market (Lewis et al., 2008; Pfau-Effinger, 2006). Birgit Pfau-Effinger's typology highlights the blurred boundary between informal and formal care by tracing the development of informal care to paid care as 1) 'care' in the form of undeclared work in private households, that is commodification without formalisation, 2) semi-formal, welfare state-supported forms of 'care' in private households and 3) 'care' in the form of formal paid work (Pfau-Effinger, 2006, p. 139). Similarly, Leira's (2002) framework illustrates how commodification can reflect both familisation through cash benefits supporting parental child care, or defamilisation through state-subsidised child care services or benefits for non-parental child care (presented in Lister et al., 2007). However, compared with other welfare regimes, scholars argue that in liberal countries the failure to expand publicly provided care has meant that care remains in the private family domain, or is shifted to the private market, where service users are viewed as consumers within the market for child care. This third concept, marketisation, can contribute to privatisation, commercialisation (Adamson & Brennan, 2014; Brennan, Cass, Himmelweit, & Szebehely, 2012; King & Meagher, 2009; Mahon et al., 2012), commodification (Claassen, 2011; Daly & Lewis, 2000; Ungerson, 1997), corporatisation (Brennan, 2007; Press & Woodrow, 2005), and informalisation (Busch, 2012), among others. The implications of marketisation, privatisation and commercialisation are discussed further in the final section of this chapter in relation to policy design and ECEC outcomes.

In terms of commodification, marketisation can also link care, migration and employment policy and, in doing so, shifts care responsibilities across national borders. Global migration, national immigration policy and, as scholars argue, a shift to funding commodified forms of care, result in migration and care being intrinsically linked in the way governments support different types of care and domestic work (Arat-Koç, 1999; Busch, 2013; Cox, 2006, 2012; Morel, 2012; Nordberg, 2012; Shutes & Chiatti, 2012; Williams, 2010b, 2012b). Nicky Busch also illustrates how migration and care policy in

the UK shapes processes of informalisation and deprofessionalisation of in-home child care (Busch, 2012).

Other welfare state scholars point to the interaction of care and employment policy (Morgan, 2005; Simonazzi, 2009). Morgan (2005) shows how the more regulated labour markets in Western Europe limit the growth of a private child care market, while in the United States the low-wage labour force (and lack of formalised child care) drive a market for private child care. Morel points to the, more recent, reforms to welfare benefits and tax measures in Western Europe that have expanded the market for commodified care – for both child care, elderly care, and other low-skilled domestic workers (Morel, 2012). These literatures discuss how policy restructuring influences the supply and demand for in-home care and, thus, contribute new approaches to classifying and explaining variation in care regimes (Bettio & Plantenga, 2004; Cox, 2012; Michel & Peng, 2012; Morel, 2007, 2012; Williams, 2012b; Williams & Gavanas, 2008). In both Southern Europe (Bettio & Plantenga, 2004) and Asia and North America (Michel & Peng, 2012), it is argued that through marketisation and migration there has been a shift from familialist care regimes to 'migrant-in-the-family' care regime.

In various contexts, scholars point to the relationship between welfare state restructuring, care responsibilities and the implications for issues of gender, class and race, which are exacerbated when care work is provided in the home (Busch, 2013; Cox, 2006, 2012; Graham, 1991; Lister et al., 2007; Tronto, 2002; Williams, 1995, 2010b, 2012a; Williams & Gavanas, 2008). Canadian scholars also point to policy interactions to illustrate how the Live-In Caregiver program and the lack of formal, regulated ECEC favours private responsibility for the care of young children and, at the same time, creates gender, class and racial inequalities among mothers and care workers (Arat-Koç, 1989; Bakan & Stasiulis, 1994). These implications of different policy designs are touched on again in the final section, which provides background for Chapters 5 and 7.

Scholars increasingly point to the role of ideas and attitudes in restructuring care responsibilities. Where care is perceived as a private activity – as in liberal countries – the process of commodification takes the form of private, market-based care, opposed to

commodification of care to the public or community sector in the form of professional care, as in Scandinavia (Leira & Saraceno, 2006, p. 10). Monique Kremer conceptualises divergences in countries' care responsibilities as 'ideals of care'. Kremer's (2002, 2006, 2007) framework identifies four ideal type care arrangements that denote different ideas about the division of care responsibilities and the appropriate care of young children. The 'starting point' is full-time mother care. Surrogate mother care, intergenerational care, parental sharing and professional care are presented as alternative ideals that reflect interactions between embedded policy structures and care cultures. Shifting care responsibilities are therefore also shaped by policy contexts and national and local conceptualisations of care.

ECEC is increasingly 'going public' with a move from care being delivered in the home to outside the home and also through increasing state support for parental leave and tax credits for child care (Lister et al., 2007). Processes of restructuring care responsibilities from the private domain toward the state and market come from pressures from stakeholder groups demanding greater equality as workers and carers. Fiona Williams explains how pressures for policy change are shaped by stakeholder groups' claims for rights, recognition and redistribution. For example, the process of marketisation addresses claims for redistributing care responsibilities from families to the state and market, to recognise the earning capacity of mothers. Calls for 'defamilisation' of care by alleviating families (read mothers) of their care responsibilities can be addressed by either public provision or *public financing of private services*. Claims for private delivery are linked to claims for rights as service users, which support the implementation of tax credits and vouchers to subsidise child care by nannies and childminders (Williams, 2009). For example, Williams and Gavanas illustrate how in the UK discourse around consumerism and choice act to legitimise acceptance for in-home and migrant care workers (Williams & Gavanas, 2008), thereby justifying public funding for private, informal and commodified care arrangements. Restructuring of care policies through marketisation and privatisation can support the rights of parents to use informal care provision *as consumers;* however there are implications for the social rights of care workers, particularly migrant caregivers.

As mentioned in the introduction, the distinction between nannies and *au pair*s is increasingly blurred in policy, particularly with the influx of migrant care workers from Eastern Europe who no longer require *au pair* visas to work in private homes in the UK (Busch, 2012, p. 74). With the exception of recent European research (Cox, 2006, 2012; Lister et al., 2007; Morel, 2012; Sollund, 2010; Williams, 2010b; Williams & Gavanas, 2008) few scholars have analysed nannies and other forms of in-home child care as part of comparative ECEC or broader policy regime analyses. Rather, scholarly research on 'nannying' and *au pairs* has focused on the everyday experiences of domestic workers, particularly the relationships to their employer, migration, and related issues of inequality and exploitation (Hondagneu-Sotelo, 2007; MacDonald, 2010; Pratt, 2012; Williams, 2010b). In the UK, earlier research focused on the resurgence of domestic work and the drivers for supply and demand of these workers in the 1980s (Cox, 2000; Gregson & Lowe, 1994). The institutional contexts, namely migration policy and au pair agencies, that shape *au pairs'* experiences, noted by Newcombe (2004), are also explored by Busch within the context of changing visa rules associated with the opening up of the European Union (Busch, 2012).

In Canada, research focuses on the Live-In Caregiver program and the implications for immigration status, exploitation and citizenship (Arat-Koç, 1989; Bakan & Stasiulis, 1997; Brickner & Straehle, 2010; Stiell & England, 1997). In Australia, where 'nannying' and domestic work is arguably the least prevalent among the three countries, research has examined the use of nannies as part of analysis on changing patterns of expenditure on domestic work (Bittman, Matheson, & Meagher, 1999), as well as more recent contributions on the rising public interest in subsidies for nannies (Garvis & Pendergast, 2013). Meagher also points to the gap in research on domestic work in Australia, and illustrates how changes to the institutional structures of domestic work in the 1990s arguably differed to other developed countries (Meagher, 1997). Nannies, and domestic care labour more broadly, is also examined by sociologists and political economists in relation to global care movements (Fudge, 2011; Hochschild, 2000; Yeates, 2005a, 2005b). These bodies of literature are critical for understanding the respective micro-level and macro-level dynamics shaping in-home child care; however it also illustrates a gap in research at the meso-level, specifically in relation to the

origins and policy structures of the child care sector (Bettio & Plantenga, 2004; Morel, 2012; Williams, 2010b; Williams & Gavanas, 2008).

This previous two sections demonstrate that while recent research examines the complex interactions between care and migration regimes in Europe, there is an identifiable gap in research that integrates a comparison of in-home child care as part of ECEC policy analysis. Care and migration policies and embedded norms shape the division of care responsibilities between public and private, formal and informal, paid and unpaid domains. These policies and embedded norms often shape, and are shaped by, different sets of ideas about the purpose of different forms of ECEC. This is the focus of the next section.

Ideas and rationales for ECEC

Governments and international organisations have embraced the term 'Early Childhood Education and Care' (ECEC) to endorse children's place in the public domain and on policy agendas. This is driven by national (and increasingly international) political and economic contexts that view children as worthy investments. Governments tend to rationalise involvement in the funding and delivery of ECEC in relation to perceived needs and policy problems. Research and advocacy in the fields of child development and wellbeing, gender equality and women's workforce participation, and child poverty have been among the prominent pressures behind governments' increasing responsibility for ECEC, and research in these areas informs the development of rationales for public investment in ECEC. Informed by theories and literature about policy frames and paradigm shifts, this section reviews literature about rationales for in-home child care, and ECEC more broadly. The first part of this section outlines the importance of ideas and rationales (or 'frames') for ECEC; and the second part focuses on the concept of social investment in relation to new frames and rationales for ECEC. Chapter 3 expands further on the theoretical and methodological approaches to analysing rationales and discourse that contribute to the analytical framework for this thesis (Bacchi, 2000, 2009; Béland, 2005, 2009a; Hall, 1989; Hall & Taylor, 1996; Schmidt, 2010).

As part of the restructuring of social policies since the 1970s, welfare state scholars, including political scientists, identify particular shifts in government approaches to the

provision of social programs. Early childhood education and care features prominently in debate about government responsibility for social services. Social policy and ECEC scholarship confirms the significant role ideas and rationales have in framing government support for early education and child care services (Lewis & Campbell, 2008; Mahon, 2010b; Prentice, 2009; White, 2011b; Williams, 2009) and illustrate how policymakers adopt frames to engage with stakeholders about social problems and desired policy responses (Mahon, 2010b). Peter Hall explains how

> policymakers customarily work within a framework of ideas and standards that specifies not only the goals of policy and the kind of instruments that can be used to attain them, but also the very nature of the problems they are meant to be addressing (Hall, 1993, p. 279)

The way policy problems are framed and debated by policymakers, sector stakeholders and academics are critical to understanding how government support for ECEC aligns with political and public interests. Individual and group needs for financial assistance and services are shaped by multiple – and sometimes competing – social needs. In the area of ECEC, frames and rationales have, at the simplest level, influenced whether the purpose of programs for young children is 'care' or 'education' (Mahon, 2010b). As mentioned earlier, across the developed world ECEC is increasingly 'going public', however as Daly and Lewis note

> the meaning of reforms that look quite similar on paper can be quite different because of the context in which they are inserted and because the motivation behind them is often different (Daly & Lewis, 2000, p. 292).

Tracing the trajectories of 'child care' and 'early education', traditional child care refers to forms of formal, non-parental care for young children to allow women's participation in the labour market. As discussed earlier in this chapter, the women's movement campaigned for child care as a means to achieve gender equality in the home and the workplace. More recently, child care is viewed by governments as a means to facilitate workforce participation to improve productivity (Lister, 2006). Early 'education' programs are promoted as offering child development and learning opportunities. Under this rationale, the benefits for children, particularly in the future, are emphasised (Jenson, 2008; Lister, 2006; Morgan, 2009).

Research scholars in ECEC identify various sets of ideas that contribute to professionals' and the public's perspectives of ECEC provision (Penn, 2011; White, 2011b). As mentioned in the previous section, collective actors, too, develop frames to influence their desired purpose and design of policies and programs, creating a complex dynamic between the state and society, demonstrating how frames "shape whether or not the claims are implemented and their outcomes" (Williams, 2009, p. 3).

Frames for thinking about ECEC are shaped by various bodies of research and rationales (Penn, 2011). These include scientific research about the costs and benefits of investing in children's development (Heckman, 2006; McCain & Mustard, 1999); popular science (Smyth, 2014); social movements (e.g. feminism, children's rights); demographic pressures (e.g. low female employment rates; low fertility rates) and cost benefit analysis (e.g. reduction in poverty and crime rates). Economists and social scientists have lauded ECEC as a worthwhile investment based on both economic and social rationales with benefits outweighing costs in the short- and long-term (Cleveland & Krashinsky, 1998, 2003). This body of research is critical in shaping debates about alternative models and best practices in ECEC. Rationales reflect the way 'problems' are articulated, and influence the policy structure and program design promoted by government (outlined in the next section). For example, Jenson proposes that when ECEC rests only on a labour force participation rationale, "babysitting and unregulated care may be considered sufficient" (2008, p. 366), whereas when focused on child development and early learning centre-based, regulated care, is promoted. As Rianne Mahon explains,

> If the 'problem' is framed as development needs for the child the response would be part day universal care; but if framed for women's labour market participation it would be full-day, full-year programs; and if framed around equal opportunity and life changes there would be a mix of educational and social services targeted toward low-income, immigrant families and single parents (Mahon, 2010b).

National governments and advocates, and international organisations, increasingly emphasise a human capital approach to social policy. This frames ECEC around children's 'early learning and development' and concerns about child poverty, which often extends to include parents' workforce participation (Australian Government,

2009; Council of Australian Governments, 2009; Department for Education (UK), 2003; Dobrowolsky, 2002; HM Government, 2009; Mahon, 2009a). The neo-liberal focus on education and skills also promote the professionalisation of the ECEC sector, which, some scholars argue, emphasise increased investment in training and qualifications for ECEC workers but also raises concerns about further fragmentation between 'education' and 'care' services (Moss, 2006; Osgood, 2009; Woodrow, 2008).

The emphasis governments place on investing in human capital is explained as part of government restructuring in response to demographic and social pressures in the 1970s and 1980s. Bonoli argues women and children were increasingly identified as 'social risks' (Bonoli, 2005). Patterns of restructuring and retrenchment are conceptualised by various scholars as a 'social investment approach', which draw on different strands of liberalism (discussed in the next chapter). British sociologist Anthony Giddens is regularly noted among the first scholars to use the term 'social investment state' to explain the neo-liberal approach to government restructuring in the 1980s and 1990s in the UK (Giddens, 1998). Social investment represented a shift from policies aimed to protect individuals from the market through social protection toward 'productive welfare', reflected in active welfare measures, and a focus on skills, labour force participation and early education (Esping-Andersen, 2002; Giddens, 1998; Morel, Palier, & Palme, 2009). These shifts are evident through increased public (and private) expenditure on early education and intervention services for young children and also on activation measures to support mothers' workforce participation.

Morel et al (2009) identify three 'varieties of social investment': investing in human capital; removing obstacles to employment; and preventing the depletion of human capital during periods of unemployment. Similarly, Ruth Lister's (2004) typology identifies variation in the way social investment was promoted under the 'third way' approach, which combines elements of social democracy and neo-liberalism (2004, p. 158). She identifies how social investment is conceptualised in three ways: as a 'pragmatic response' to the "perceived economic and social challenges facing mature welfare states"; as an 'analytical tool' to explain contemporary developments in liberal welfare states; and as a 'normative ideal' where children stand as "emblems of a future, prosperous, cohesive, and inclusive society" (Lister, 2004, p. 157). The future-oriented

approach to social investment gained momentum through Esping-Andersen's book, 'Why we need a new welfare state?' (2002). Here, he argued a human capital approach to investing in children is needed to address shifting labour force trends and demographic changes. As he argues, spending on children in the present produces benefits to them and society in the future:

> If we aim for a productive and socially integrated future society, our policy priorities should centre on today's children and youths. Solid investments in children now will diminish welfare problems among future adults (2002, p. 51).

The child-centred approach to social investment is critiqued by gender and care scholars, among others, for its limitations in addressing gender equality for women. It is also critiqued for its focus on the future benefits of children, to the neglect of their current wellbeing (Dobrowolsky & Jenson, 2004; Jenson, 2009; Jenson & Saint-Martin, 2003; Lewis & Campbell, 2008; Lister, 2006; Lister et al., 2007; Lloyd, 2008; White, 2011b; Williams, 2004a, 2009).

The three liberal countries in this study have adopted a human capital approach to social investment which rests on an economic rationale for investing in ECEC – for the education benefit to children and the economic gains from mothers' employment (Adamson & Brennan, 2014; Dobrowolsky & Jenson, 2005; Lister, 2006; Peng, 2011; Prentice, 2009; White, 2012). This 'narrow' human capital approach to social investment ignores the potential for a more holistic approach to investment in ECEC – that is investment in the quality of care to address children's rights and wellbeing and the quality of employment for the care workers. A narrow approach also ignores the needs of older adults and people with a disability (Morel et al., 2009). Human capital discourses of social investment can also distinguish children from (female) workers in liberal countries (Australia and Canada) and Asian countries (Japan and South Korea), respectively. Liberal countries have adopted an "invest in the future" model; and Japan and South Korea emphasise women's labour force activation, which Peng calls the "human capital activation" model (Peng, 2011).

Alternative models of social investment are adopted in other welfare regimes, notably Nordic countries, and are characterised by the attention given to children's rights and

gender equality (Morel et al., 2012; Morgan, 2009). Scholars critique the narrow human capital approach in liberal countries, which encourages mothers' workforce participation, within the context of inadequate provision of ECEC services. That is, subsidies and tax measures are promoted as a means to reconcile the costs of non-parental care, but the availability and quality of formal ECEC is not prioritised. As indicated in the previous section, the use of subsidies and tax measures within a care market are framed to facilitate workforce participation for care users/consumers (parents), and also provides a means to achieve productivity through low-skilled, often vulnerable, workers employed in the domestic sphere (Morel, 2007, 2012; Morgan, 2005). This approach to supporting child care can be framed as an active welfare policy that invests in the knowledge economy and, at the same time, alleviates the need for passive welfare assistance by the domestic workers.

Within a liberal social investment frame, the lack of formal ECEC creates demand for informal and private arrangements, including in-home child care (Arat-Koç, 1989, 1999, 2012; Brennan et al., 2012; Lister et al., 2007, Chapter 5; McKeen, 2007; Morgan, 2003; Stasiulis & Bakan, 1997). For example, Le Baron argues that neo-liberal restructuring in Canada

> actively promote[s] the employment of live-in domestics as the solution to the burdens of housework and child-care among high and middle income groups, presenting this privatised solution as a 'deal' for many women who can enter the workforce…and at the same time can 'provide jobs' for women from the global South… (LeBaron, 2010, p. 903)

Sedaf Arat-Koc, a feminist sociologist known for her work on migration and citizenship, expresses concerns in relation to the hiring of live-in caregivers in Canada. She argues that neo-liberal discourses through the 1980s and 1990s legitimised economic rationales to hire domestic migrant workers[5], and ignored gender inequalities

---

[5] According to Sandra Singh, the executive director of the National Alliance of Philippine Women in Canada the "LCP totally fits the neo-liberal agenda of globalization and capitalism (quoted in Singh, n.d.).

among 'white' women. That is, neo-liberal ideas legitimise and normalise the use of migrant domestic workers as they enable middle-class white women to achieve a form of equality based on male norms (Arat-Koç, 2012, pp. 5, 12).

The promotion of women's employment under a liberal social investment approach therefore validates the commodification of domestic work because it makes it possible for more household members to engage in waged work and creates opportunities for lower-paid (often migrant) women to participate in the labour force. However, as mentioned earlier not all support for in-home child care is driven by the same rationales and ideas. Minna Rantalaiho (2010) shows how, even among Nordic welfare states, government support for in-home child care is shaped by different 'discursive framings' underpinned by a set of social norms and values. While 'choice' is said to be the main argument for establishing cash-for-childcare, she finds that the design of the policy and what is offered to parents depends on different childcare policy rationales. More specifically, in Sweden cash-for-childcare focuses on working families, while in Norway it is a child-based welfare good. The choice rhetoric attached to a neo-liberal policy discourse of retrenchment and consumerism is contrasted with the Nordic context of increasing choice through new, rather than restructured, welfare goods (Brennan et al., 2012; Sipilä et al., 2010, pp. 167-168; But also see Williams, 2012b, p. for recent convergences between these regimes).

The next section examines how different ideas and rationales for ECEC are linked to the policy models for funding and regulating different forms of ECEC, including in-home child care.

Policy design and ECEC outcomes

Welfare restructuring in liberal states is reflected by a shift from traditional publicly funded and delivered welfare services to alternative approaches, or tools of governance (Salamon & Elliott, 2002). As discussed above, the ideas behind welfare restructuring differ across countries and policy areas. Policy restructuring in care and human services regularly signals a shift from supply-side to demand-side funding. Governments' decision to employ demand-side funding reflects a level of marketisation and may encourage complex processes of informalisation (or commodification) and privatisation

of care, outlined earlier (Mahon et al., 2012; Williams, 2009; Williams & Brennan, 2012).

This section reviews research on ECEC policy models, which is largely drawn from research by social policy scholars interested in gender and care, but also by political economists, and early childhood development scholars. This broad body of research highlights variation in the approaches and outcomes of different funding and regulatory models, encompassing different disciplinary perspectives. This part of the review focuses on liberal countries' policy approaches, with some contrast to other welfare regime groups. Key research and debates regarding alternative policy approaches to ECEC are outlined, and arguments are presented in relation to in-home child care. Most of these studies use institutional approaches, which draw on structural features of welfare states and ECEC policy, such as funding measures and regulation, to examine the outcomes in terms of participation in ECEC (access), affordability and quality aspects. Studies often contrast different ECEC models as independent variables – public versus private, or universal versus market-based – to compare outcomes across systems. Some also draw on qualitative research methods to support families' and in-home child care workers' experiences of ECEC and in-home child care.

Market mechanisms figure prominently in the delivery of care and human services in liberal welfare states (Baker, 2006; O'Connor et al., 1999; Salamon & Elliott, 2002). Mechanisms can include contracting services to private providers, and the introduction of vouchers, fee subsidies and tax credits. For example, Jenson and Sineau point out how tax credits "fit well with neo-liberalism's enthusiasm for seemingly lower 'state expenditures' as well as greater 'choice'" (Jenson & Sineau, 2001, p. 255). However, tax credits are not used in all liberal countries, and are not exclusive to liberal countries.

There are patterns of convergence in care policy across regimes as market mechanisms are increasingly employed in ECEC (Baker, 2006; Brennan et al., 2012; Mahon et al., 2012). However, the marketisation of services delineates two processes of policy restructuring, which (as identified earlier) relates to the different starting points and cultural norms for countries ECEC systems. In the case of liberal countries privatisation (or 'reprivatisation' to denote previous private family responsibility) is equated with

marketisation where services and care arrangements are contracted to private services and sometimes to the informal sector. In contrast, privatisation in the Nordic countries is linked more to the shift from public delivery to a mixed market of providers. ECEC services in Nordic countries are still primarily universally funded through supply-side mechanisms, with additional demand-side subsidies to create additional options for families (Mahon et al., 2012; Sipilä et al., 2010). In Nordic countries marketisation represents a shift from universalism in the pure sense of publicly delivered services for all. Scholars are therefore less critical of the Nordic experience of privatisation because market mechanisms in place do not promote commercialisation and commodification to the same extent as liberal countries (But see Isaksen, 2011; Sollund, 2010; Williams, 2012b).

Market models in liberal countries tend to provide subsidies for a range of not-for-profit and for-profit private providers and in some instances include tax deductions and credits to promote 'choice' for parents (Doherty, 2007; Mahon, 2002; Naumann, 2011; Wincott, 2006). Market models are often promoted by 'choice and flexibility', and financial assistance to help with the affordability of ECEC and to promote women's employment and productivity. In contrast, universal models tend to focus on child wellbeing, equal access, gender equality and citizenship. In a universal system, all children and families have equal access to services as citizens, rather than as an entitlement as the children of workers (Dobrowolsky & Jenson, 2004; Dobrowolsky & Lister, 2006; Lister et al., 2007). The primary argument supporting universally designed services is that they are easily accessible, and are more effective in reaching the most vulnerable families (Doherty, 2007). Findings from studies comparing ECEC outcomes with respect to provision (public versus private) and funding (market-led versus universal) are outlined below in relation to impacts on availability, affordability and quality.

Early childhood policy analysts and welfare state scholars have compared policy approaches and outcomes across regimes (Bonoli & Reber, 2010; Jenson & Sineau, 2001; Kamerman, 2000; Meyers & Gornick, 2003; Michel & Mahon, 2002) and within regimes (Baker, 2006; Lister et al., 2007; O'Connor et al., 1999). The OECD's Thematic Review of ECEC and UNICEF's League Table (Organisation for Economic Co-

operation and Development, 2006; UNICEF, 2008) succeeded in bringing increased attention to various ECEC models, emphasising how countries and regimes differ in their approaches to funding and delivery. The OECD reviews (published in two stages in 2001 and 2006) provided recommendations and further analyses through a 'naming' and 'shaming' process (Bonoli & Reber, 2010; Neuman, 2005). For example, Scandinavian countries are noted in literature and policy reviews of ECEC for providing universal ECEC through high public expenditure and regulation of quality (Bennett, 2008; Kamerman, 2000; Meyers & Gornick, 2003; Penn, 2009a), and Sweden is commended for best practice in providing high quality ECEC for all children, and also for their model's commitment to gender equality (Organisation for Economic Co-operation and Development, 2006).

Cross-national review and policy analyses confirm that public ECEC systems achieve better outcomes than private, market-led system in relation to *access*, *affordability* and *quality* (Cleveland & Krashinsky, 2003; Meyers & Gornick, 2003; Organisation for Economic Co-operation and Development, 2006; Penn, 2009b). Despite claims for market-led systems to deliver greater choice for parents, economics, sociology and political science scholars alike criticise market models for their inability to achieve efficient and effective outcomes (Ball & Vincent, 2005; Blank, 2000; Brennan et al., 2012; Cleveland & Krashinsky, 2009; Greener, 2008; Lloyd & Penn, 2012; Moss, 2009; Taylor-Gooby, 1998).

Not all research opposes private care, however there is consensus from studies that publicly provided services have better outcomes in terms of *accessibility* and *affordability* (Meyers & Gornick, 2003). Similarly, Meyers and Gornick compared the consequences of different institutional arrangements for ECEC across fourteen OECD countries to examine the outcomes with respect to availability and affordability. They found that countries with higher public provision of care (mostly Nordic countries) deliver more affordable and accessible care, especially for younger children, compared with countries with high levels of private provision (such as liberal countries) (Meyers & Gornick, 2003, p. 406). Tax measures, in particular, are criticised for providing greater benefit to higher income families, and offering limited value to low-income families (Harder, 2004).

In relation to *quality*, Penn found that countries with mixed markets in ECEC generally did not meet goals of achieving high quality provision (Penn, 2009b). An analysis of the implementation of vouchers in Australia, the Netherlands and France found that "child care vouchers contrast with direct public investment" and while they may increase parental choice through a market supply response they also "raise concerns about quality" (Warner & Gradus, 2009, p. 2). Lloyd & Penn's edited volume (2012) on markets in child care provides a diverse collection of countries' experiences with marketisation and privatisation, and presents a compelling case against certain forms of marketisation. Also, private for-profit services are associated with lower quality care than private not-for-profit services (Brennan, 2007; Cleveland & Krashinsky, 2003, 2009; Rush & Downie, 2006; Sumsion, 2006a). Overall, studies using both qualitative and quantitative methodologies to compare different ECEC policy systems have found that the consequences of markets with respect to the affordability, accessibility and quality of care (Cleveland & Krashinsky, 2009; Lloyd & Penn, 2012; Meyers & Gornick, 2003; Moss, 2009; Penn, 2012).

As discussed earlier in relation to care regimes and classifications, market mechanisms facilitate private provision, which may constitute the process of commercialisation in the formal sector and/or commodification through the informal sector. As mentioned earlier, commodification occurs when care services are outsourced from the family or the public sector to the private market, or from unpaid to paid care. Commercialisation occurs when care services in the market are privatised and profits are made. Commodified care can exist within formal and informal markets, while commercialised care can only exist within the formal market. The processes of privatisation, commercialisation (and corporatisation), and commodification have different impacts on the sector and result in different outcomes for families. More specifically, the negative consequences for outcomes with respect to affordability and quality are compounded when ECEC is commercialised, and the Australian case provides a particularly stark example of the impacts of corporatisation (Brennan, 2007; Brennan & Adamson, 2012; Sumsion, 2006a). The negative consequences of marketisation and privatisation can be mitigated by preventing the commercialisation (entry of for-profit providers) from entering the market and prohibiting corporatisation (their ability to be a publicly traded company) (Newbury & Brennan, 2013; Sumsion, 2013).

Scholars in the UK (Moss, 2007, 2009), Australia (Goodfellow, 2005; Woodrow & Press, 2007) and Canada (Cleveland & Krashinsky, 2001; Friendly, 2004; Friendly & Prentice, 2009) have proposed alternative approaches to ECEC, with a particular emphasis on building in an 'ethic of care' to enhance quality and provide more holistic ECEC systems (Moss, 2007, 2009; Sumsion, 2006a), with Peter Moss envisioning a model of 'democratic experimentalism (Moss, 2009). This requires a shift from thinking about child care and early learning as commodities that are purchased by consumers (parents) to a vision of ECEC settings as community resources, that are a public responsibility and also a public space (Moss, 2012).

The body of research on formal ECEC policy indicates the strong push among the ECEC community to pursue a universal model of ECEC; however it also points to a gap in research focused on other forms of child care, particularly informal and in-home child care, and the way in which governments facilitate and encourage different types of care. Market mechanisms can be designed to exclude certain types of care from the formal sector through regulation and monitoring (Land, 2002) and funding structures can also be designed to allow formerly informal or 'grey market' services into the formal mixed market of care (Lister et al., 2007; Morgan, 2005; Warner & Gradus, 2009; Williams, 2010b). For example, Warner and Gradus point out that

> [e]ven as the formal child care market has grown, the informal and non-market elements have remained strong… the substitutability among forms of care raises special concerns when considering the supply and demand responses in a child care market (Warner & Gradus, 2009, p. 9)

The subsidisation of private, informal care is a contentious issue among ECEC and care scholars. As mentioned in the Introduction, scholars acknowledge that informal care can be "a positive choice" for parents (Land, 2002; Land & Himmelweit, 2010; Rutter & Evans, 2011; Skinner & Finch, 2006; Vincent & Ball, 2006). Hilary Land stresses the interdependence between informal and formal child care and states that in Britain "there is confusion about how and where the boundary between care in the public sphere and care in the so-called private sphere should be drawn" (Land, 2002, p. 25). She argues therefore that limiting government policy mechanisms to formal childcare arrangements fails to recognise the value many families place on informal care arrangements by

relatives, friends and neighbours. Others assert the consequences of government involvement in informal care (Lewis, 2008; Penn, 2009b; Rutter & Evans, 2011). As noted in the Introduction, Land argues that "rewarding, regulating and sustaining providers of informal care raise complex and controversial issues" (Land, 2002, p. 13). Skinner and Finch's (2006) explored the potential to extend tax credits to informal care in the UK and identified benefits for children and parents. However, they also highlight the complexities of supporting informal care, including the challenges of disentangling the impact for relative versus non-relative care relationships, particularly the importance of recognising grandparent (usually grandmother) child care and the value of care work performed by women. As pointed out earlier in this chapter, the consequences of ECEC funding extend beyond gender equality issues for mothers (and grandmothers) and quality issues for children; it also poses the potential exploitation of care workers, where markets that facilitate the employment of in-home care workers stimulate demand for low-wage migrant workers (Arat-Koç, 1989; Busch, 2013; Cox, 2006, 2012; Williams, 2008, 2010b).

Research on child care and ECEC policy indicates how the marketisation and commodification of care through support for the 'grey market' has implications for quality and equality of care work (Rutter & Evans, 2011). Williams summarises the potential implications of tax credits and care vouchers for migrant care workers:

> tax credits or the equivalent might offer choice if they operate in the context of the private market … [but] where private market care is expensive, care consumers will look for cheaper options, chasing cheaper and often exploited migrant labour (2009, p. 14).

Pfau-Effinger and Leira's frameworks, introduced earlier, conceptualise processes of formalisation and commodification in relation to paid and unpaid care work (Pfau-Effinger, 2006, p. 139); and familisation/defamilisation (Leira, 2002). Their frameworks offer a lens through which to analyse the details of policy reforms. For example policy reforms in all three study countries have promoted different levels of commodification through tax subsidies and vouchers that facilitate undeclared work in the private home and semi-formal welfare-state supported forms of care in private households. Alternatively (or in combination) cash benefits for mothers to stay at home or tax measures that favour one earner households promote (re)familisation (Baker, 2006;

Jenson & Sineau, 2001; Lister et al., 2007; Williams, 2010b; Williams & Gavanas, 2008).

Policy mechanisms that encourage commodification, familisation and privatisation of care create complex relationships between the state, the market and the family, as families receive public funding to purchase services or provide care in the home (Lister et al., 2007; O'Connor et al., 1999). Families' ability to find appropriate care is shaped by these mechanisms, but is also determined by their local market (of formal and informal services) and preferences for different forms of care – again, shaped by local preferences and class practices (Duncan, Edwards, Reynolds, & Alldred, 2004; Vincent & Ball, 2006; Vincent, Ball, & Kemp, 2004). For example Gregson and Lowe's study of domestic work in the 1980s and 1990s argued that Britain experienced resurgence of domestic help in the form of low-paid domestic workers driven by the lack of job opportunities for low-skilled women, and also by the limited ECEC options for middle-class mothers returning to employment. The authors propose that public support for childcare would challenge the resurgence of waged domestic labour, and therefore address the inequalities associated with domestic work and care. However the authors also asserted that demand for nannies is shaped by the "ideological convictions underlying preferences for children to receive individual care in their own homes" (Gregson & Lowe, 1994, p. 239).

The relationship between structural policy components (such as tax measures and subsidies) and cultural values is increasingly debated in welfare state literatures. Scholars contend that dominant government discourses are critical in explaining cross-national divergences in policy attitudes towards care arrangements (Kremer, 2006; Larsen, 2008; Lewis, 2009; Van Oorschot et al., 2008; Williams, 2008). For example, Kremer illustrates how, in Flanders, state investment in child care has formalised care through subsidisation and regulation of informal arrangements and unintentionally "whitened the grey market of child care, so that informal paid childminding has become a rare phenomenon" (Kremer, 2002, p. 120). While it is argued that in the UK embedded norms about child care shifted quickly in the late 1990s from the private to public domain (Lewis & Campbell, 2007b; Lloyd, 2008; T. Smith, 2007; Williams, 2004b; Wincott, 2006), many scholars still believe the 'nanny culture' in the UK exists

regardless of the available and affordability of formal ECEC (Busch, 2013; Cox, 2006; Gregson & Lowe, 1994). For example, Williams and Gavanas's comparative study of in-home child care state that it is not simply the absence of child care services but the nature of the services that "stimulates particular sorts of demand by working mothers" (Williams & Gavanas, 2008).

Kremer illustrates how the interaction of policy and culture can reinforce care ideals and the continuity of ECEC arrangements or, conversely, create pressure for alternative policy options (Kremer, 2006, 2007). Overall, within a marketised system of ECEC, analysis of in-home child care must consider the policy details in relation to the impact on the availability, accessibility and quality of services for families; and also the inequalities and working conditions for care workers. Comparison of care policies must also give attention to the different social, political, cultural and demographic context, and how this shapes ideas about the most appropriate forms of care for young children.

Gaps and justification for research

Overall, the literature shows us that the actors and movements driving support for increased public investment and provision in ECEC services in the 1960s and 1970s were overshadowed by welfare state restructuring through the 1980s and 1990s. In particular, as new actors joined together to advocate for ECEC, the reasons for government involvement shifted toward an economic focus, namely children's education and women's productivity. The liberal countries included in this study are grouped together for regarding the care of young children as a private matter; however the division of responsibilities across the public, private, informal and formal domains differ. These differences are attributed to social, cultural, political and demographic pressures that shape ideas and discourses about the most appropriate forms of ECEC, which contribute to different government rationales for investment in ECEC. We know that governments invest in ECEC for different reasons and that the policy objectives impact the types of care that are supported and not supported. Similarly, the design of funding and regulation differ according to the rationales and objectives for ECEC. While the use of market-led services and forms of privatisation are increasing across Western countries, research finds that the negative consequences for families and care workers are most prominent in liberal countries. Demand-side market mechanisms

encourage privatisation, commercialisation and commodification to different extents in each country, which has implications for availability, affordability and the quality of care. This review of literature provides a strong foundation for understanding the complex boundaries between informal and formal care and public and private domains; the reasons behind government support for different ECEC arrangements; and the policy implications of marketisation for ECEC outcomes. In particular, research also points to the need to look beyond ECEC policies to analyse in-home child care. Migration policy, too, is central to understanding how governments support the hiring of nannies, *au pair*s and other domestic workers who take on child care responsibilities.

The review also reveals a gap in research on in-home child care specifically. In-home child care has arguably been 'lost' in analyses of welfare state restructuring. It does not fit clearly in care literatures on the boundaries and divisions of care responsibilities. It's also ignored in most ECEC debates centred on formal 'care' and 'early education' and related benefits and consequences for children and mothers. Policy reforms in the ECEC sector rarely consider the uneasy place in which in-home child care fits. While there are increasing pressures for flexible ECEC options to meet the needs of working families, the potential consequences from the government funding these services with limited regulation are not fully considered within the context of ECEC policy research.

The place of in-home child care differs across countries and has shifted over time. It has moved from a largely informal, unregulated type of ECEC to one that is increasingly supported through government funding and regulation. Early movements succeeded in bringing increased attention and policy focus to ECEC across developed welfare states, including liberal countries. Parallel welfare state structuring shifted the place of gender and care in welfare state classifications, resulting in blurred lines between public and private, informal and formal, and paid and unpaid care. Shifts in discourse emphasising a social investment approach succeeded in shifting responsibility for ECEC from the private to public domain; however some forms of care and education have largely been ignored in these discourses. The rationales used by governments and groups of individuals have ignored potential tensions and contradictions between the rationales used to promote social investment in ECEC, and the reality of the policy mechanisms which have been adopted. Demographic pressures and social movements, restructuring

of gender and care roles, shifting discourses and rationales for social policy and ECEC, and the adoption of new policy mechanisms have all influenced the way 'ECEC' shifted from a peripheral to central place of government's policy agendas.

However, current literature that explains the restructuring of care responsibilities separates the field of ECEC policy and migration and care. *ECEC and care policy* literatures provide a strong foundation for understanding the division of ECEC responsibilities across the public/private and informal/formal domain and associated implications for gender inequalities and social stratification for families, and the quality of care for children. Research on migration and care identifies important issues of gender, class and race for care workers. A review of these literatures therefore points to two gaps in research on in-home child care that this study can address. First, it contributes to comparative ECEC research to consider how both care and migration policy shape the supply and demand of different types of care, particularly those that cross the public/private and informal/formal domain. Second, the research on migration typically focuses on the conditions of care work with little attention given to the quality of care for the child. The study therefore contributes to research in the UK and Canada (and elsewhere) on nannies, migration and domestic work, which have analysed in-home child care as a form of domestic work, yet often ignore the interaction with ECEC policy and the related implications for families and children.

The next chapter identifies this gap within the theoretical literatures, and provides an approach to compare in-home child care within both ECEC policy and broader understandings of care and domestic work. It therefore expands further on how this study aims to contribute to the bodies of literature presented above.

Chapter 3 : Analytical approach

Analysis of early childhood education and care (ECEC) policy can be informed by various theoretical and methodological approaches and can cross disciplines including political science, economics, sociology, ethnography, and geography, among others. This study aims to not only compare how policy in Australia, the UK and Canada support in-home child care, but also to understand when these differences originated and the reasons for policy continuity and change. This chapter details theories of welfare regimes and institutionalism, introduced in Chapter 1. Together, these two bodies of literature underpin the analytical approach for this study, and inform the concept of 'care culture'. These two theories offer a framework for analysing and comparing how policy structures and discourses surrounding in-home child care are shaped by each country's policy histories and embedded norms about the place of care and ECEC. Care culture therefore offers a lens through which to examine structural and normative elements of in-home child care policy across countries and over time.

As the introduced in Chapter 2, an extensive body of scholarship developed post-WWII that compared, explained and conceptualised the restructuring of welfare states. Proponents and critics alike often cited Gosta Esping-Andersen's 'three worlds of welfare capitalism' to identify gaps or inconsistencies in his typology (Castles, 1998; Castles & Pierson, 1996; Myles & Pierson, 1997; Pierson, 1996). Feminist scholars were quick to identify the limited attention given to gender and care in early welfare regime typologies and analyses (Lewis, 1992, 1997; O'Connor, 1993; Orloff, 1993; Sainsbury, 1996; Shaver, 1990). Later critiques, including those by Jenson (1997); Knijn and Kremer (1997) and Daly and Lewis (2000) considered how the issue of paid and unpaid care is dealt with in welfare regimes classifications and subsequent gender critiques. Seeking to address the limitations of the 'three worlds of welfare capitalism', social policy scholars expanded on notions of gender and class to analyse inequalities produced by different welfare states (Korpi, 2000; Orloff, 1993; Shaver, 2000; Williams, 1995). These bodies of scholarship all contribute to welfare regime theory.

Recent comparative welfare state scholars have sought alternate and complementary approaches to comparing welfare state policy and analysing institutional change and continuity (Hantrais, 1999; Kremer, 2007; Padamsee, 2009; Pfau-Effinger, 1998, 2005a;

Van Oorschot et al., 2008). These authors look beyond the structural features for comparison and adopt a more normative approach to comparison. These literatures are integral to analysing ECEC policy over time and across countries because, as introduced in the literature review, ideas and cultural attitudes about appropriate forms of care contribute to different policy structures. Theories of institutionalism are closely related to welfare regimes literatures, as institutional scholars seek to explain why countries' policy trajectories follow certain paths. Institutional scholars point to both structural *and* normative factors to explain policy change and continuity (Hall & Taylor, 1996; Lowndes & Roberts, 2013; Peters, 2011; Pierson, 2000b; Pierson & Skocpol, 2002; Schmidt, 2010; Thelen, 1999). This emphasis on looking beyond structures, to normative explanations, is significant for understanding welfare state restructuring and care cultures.

Social policy scholars also draw attention to the different ways that welfare states affect social relations – in and outside the home. Social relations theory seeks to explain divisions and power structures – particularly gender, class and race – that emerge through social, democratic and political changes (Orloff, 1993; Williams, 1995). Social relations are especially important to the study of paid and unpaid care. Graham (1993) argues that social relations too often separate unpaid work (in the private domestic sphere) and paid work (in the public sphere). In doing so, she suggests that analysis of social relations of in-home care often centre on gender relations between family and kin, and ignores care relationships that are not mediated by kin or marriage. As Graham contends, if non-kin in-home care is considered then the division between public and private is blurred and new social divisions along class and racial lines are apparent. Daly and Lewis (2000) also point to the centrality of social relations theory in analysing care across the informal and formal domains. While this study does not explicitly adopt the concept of social relations, it is important to note its significance for broader care research, particularly that which critiques the impact of social policy in relation to gender, class and racial divisions. Instead, this study compares the transformation of in-home child care within broader institutional contexts, and therefore considers interactions at the meso-level among policy actors and ideas, rather than between individuals and family units.

Recent comparative welfare and institutional research has identified the importance of structural and normative aspects of policy to examine changes in child care and comparisons across countries. While recent scholarship in Europe has sought to extend a cultural lens to compare child care policy, including in-home-child care (Kremer, 2007; Pfau-Effinger, 2005c; Williams & Gavanas, 2008), this approach has received less attention in ECEC analysis in the three liberal countries selected for this study (with the exception of the UK in European comparison). Overall, nannies and other forms of in-home child care have been overshadowed in ECEC research and received limited attention in relation to structural differences in policy design. In-home child care has also been ignored in analysis of the development of broader policy goals and priorities for ECEC, which is central to understandings about care and early education. The remainder of this chapter presents the questions and guiding topics for the thesis, before discussing in more detail the theoretical and methodological approach to the study.

Overarching questions and research aims

The research aims and guiding questions were developed from four overarching questions, outlined below.

1. Is there a relationship between welfare state restructuring and government support for in-home child care?

Aim: To examine the transformation of in-home child care in three liberal countries – Australia, the UK and Canada – since the 1970s, by examining;

- What is distinctive about the history of in-home child care in each country? (Chapter 4)
- Who are the main actors and stakeholders that have facilitated and resisted support for in-home child care? (Chapter 4, Chapter 6)
- How has government restructuring shifted ECEC from a peripheral to central position in government policy? (Chapter 4, Chapter 6)

2. How do governments support in-home child care in Australia, the UK and Canada?

Aim: To compare and analyse government and key stakeholders' (structural and

discursive) support for in-home child care;

- What policy mechanisms facilitate families' use of in-home child care? (Chapter 5)
- How do governments situate in-home child care within their broader ECEC goals and rationales? (Chapter 6)
- Have policy and funding reforms shifted the domain of in-home child care? Informal/formal? Public/private? Unpaid/paid? Professionalised/deprofessionalised (Chapter 5, Chapter 8)

3. What are the implications of in-home child care policy for families and care workers?

Aim: To analyse and compare the impacts of government support for in-home child care for families and care workers;

- Who are the stakeholders involved in campaigning for/against support for in-home child care? (Chapter 6, Chapter 7)
- What are the consequences for different groups of families and care workers? (Chapter 7, Chapter 8)

4. Why have Australia, the UK and Canada developed diverging approaches to supporting in-home child care?

Aim: To explore how the concept of care culture explains differences across these three liberal countries

To address these questions and research aims, historical and comparative approaches are used to examine the funding and regulatory mechanisms (the structural policy design), and policy goals and rationales (policy ideas). The interaction and relationship between the policy design and policy ideas shapes, and is shaped by, embedded norms and values, or 'welfare culture' (Kremer, 2006; Lewis, 2009; Pfau-Effinger, 2005a; Van Oorschot et al., 2008; Williams, 2009). In order to capture these policy processes and interactions the study uses qualitative research methods, drawing on a range of primary and secondary policy-focused documentary sources, as well as interviews with key

stakeholders from the nanny and ECEC sectors. Next, the two bodies of literature that inform the theoretical framework for the study are presented.

Theoretical framework

Typologies of child care and ECEC in each country developed as part of broader welfare state classifications that distinguished care responsibilities across the public and private domains. As Chapter 2 introduced, the development of 'gender regimes' (Lewis, 1992) reorientated the focus of welfare typologies to consider the extent to which policies facilitated women's paid and unpaid work, for example through benefits to stay at home to care for children or public provision of services to enable mothers to work outside the home (Lewis, 1992, 1997; Orloff, 1993; Sainsbury, 1996). Particularly relevant to this study, 'care regimes' theories underpin analysis of who funds and provides care across the public and private sectors (Jenson, 1997). Welfare, gender and care regimes theories often group Australia, the UK and Canada together as part of the 'liberal type'[6] because of the distinction between the public and private sphere – a key tenet of liberal theory.

Liberalism therefore plays an important role in understanding both structural and normative differences. Structurally, liberalism informs analysis of how policy design distinguishes between different care responsibilities, where the prioritisation of the market is a central tenet to the classification of the liberal type in welfare regime analysis. But, it should be noted, market mechanisms and private providers are increasingly used across all welfare regimes types (Mahon et al., 2012). Liberalism is also central to the comparison of normative differences between countries, as liberal ideas shape countries' policy trajectories, and inform theories of institutionalism (Béland & Cox, 2011; Mahon, 2008; Schmidt, 2010; Wincott, 2011). Variation in policy approaches to ECEC and in-home child care in the three study countries is

---

[6] The United States, New Zealand and Ireland are often included also; however are not the focus of this thesis.

arguably due to different interpretations and adoption of liberal ideas, many of which are part of a social investment approach, identified in Chapter 2. Different tenets of liberalism are therefore shaped by institutional and interest-based contexts and contribute to a cultural explanation for cross-national differences (O'Connor & Robinson, 2008, p. 45).

While liberal countries are often grouped together for their similar approach to ECEC, theories of institutionalism inform our understanding of how and why particular ideas about in-home child care more specifically diverged in the three countries. Contemporary theories of institutionalism (Hall & Taylor, 1996; Pierson, 1996, 2000b; Pierson & Skocpol, 2002) underpin a growing body of literature on welfare culture and embedded norms about gender and care. These 'new' institutionalisms (discussed further below) contrast with previous theories on formal rules and structures, that largely ignored informal rules and practices (Lowndes & Roberts, 2013, p. 29). The integration of culture as an element for variation among welfare state structures contributes a theoretical framework to analyse how the interaction between origins of care, ideas and embedded norms shape policy change and continuity (Hantrais, 1999; Kremer, 2006; Pfau-Effinger, 2004; Sjöberg, 2004; Van Oorschot et al., 2008; Williams, 2010b). In the case of ECEC, institutional norms about gender and care influence what is deemed appropriate care. At the same time, welfare regime theory, introduced earlier, provides a foundation for the development and conceptualisation of gender and later *care regimes* classifications (Bettio & Plantenga, 2004; Lewis, 1997; Mahon et al., 2012; Michel & Peng, 2012; Simonazzi, 2009; Teppo, 2010; Williams & Gavanas, 2005). Some scholars sought alternative explanations to account for consistencies (and inconsistencies) between leave arrangements, cash benefits and services that characterise care regime classifications. For example, Williams argues there are various structural and normative aspects that contribute to differences among care regimes, where "policy goals, policy instruments, care cultures, practices and norms have shaped the variations in [care] policies across countries" (Williams, 2009).

Institutionalism and welfare regimes literatures give attention to the role of actors and ideas in the development and implementation of policy reforms. For the case of ECEC and care more broadly, 'appropriate forms of care' and notions of how care 'ought to'

be provided are central to concepts of care culture, which influence the acceptance and development of policy ideas and policy agendas to achieve change or continuity. The remainder of this chapter details how theories of institutionalism and welfare regimes inform the analytical approach. These theories incorporate the interaction between policy structures, ideas, and embedded norms, which are central to the concept of 'care culture'. This concept of care culture therefore accounts for the normative aspects of welfare state change and country variation, but does not ignore the structural elements, namely policy details such as funding and regulation mechanisms.

Welfare regimes to 'ideals of care': accounting for culture

As noted earlier in this chapter, welfare regime scholars provide a foundation for analysing *how* welfare states' differ in terms of spending patterns and the potential implications for how family and individual responsibilities are shared across society. Welfare regime theory proposes that states are classified according to the relationship between work and welfare state policies. This approach is underpinned by the ideas that modern welfare states moved from the traditional male-breadwinner model post WWII, and variations to the model are explained according to the extent to which work is commodifed. Esping-Anderson's original classification defined work only as paid work and welfare as policies that permit, encourage or discourage the decommodification of labour (in Lewis, 1992). Using this approach to social policy analysis, class stratification is highest in residual liberal countries where middle class rights are dependent on labour market participation, and are not protected through state policies. As discussed in Chapter 2, gender critiques of welfare regime theory contribute alternative classifications for analysing policy reforms and welfare state change. Traditional classifications are critiqued for the limited attention given to the analysis of gender stratification and the place of care work (Baker, 2006; Lister et al., 2007; Michel & Mahon, 2002). Analysis of (paid and unpaid) care work is central to an analysis of gender stratification and *gender regimes* (Lewis, 1992, 1997; Orloff, 1993; Shaver, 2000) and *care regimes* (Bettio & Plantenga, 2004; Mahon et al., 2012; Michel & Peng, 2012; Williams & Gavanas, 2008).

Welfare regimes theories therefore offer a useful starting point for considering the scope and variation of funding and policy mechanisms for particular social policies, including

ECEC. Cross-national studies of ECEC policy draw on comparative welfare regime theories to analyse and compare funding mechanisms, regulations, benefit eligibility and generosity (see Bonoli & Reber, 2010; Jensen, 2009; Meyers & Gornick, 2003; Organisation for Economic Co-operation and Development, 2006). While liberal countries are grouped together within a single welfare regime to reflect their reliance on private care, O'Connor et al (1999) suggested that "discussion of the liberal type has given little attention to those aspects of liberal ideology which refer to gender and the relation between state and family" (O'Connor et al., 1999, p. 43). These authors identified different *gender logics* within liberal welfare countries, with governments' policies supporting gender-neutrality in Australia, gender-difference in the UK, and gender-sameness in Canada.

The classification of *care regimes* focuses on *who* provides care and *how* it is provided (Jenson, 1997). Care regimes are characterised by the way countries rely on state, voluntary workers or the private market for care, and whether provision is accessed through services, cash payments (i.e. care allowances), or tax benefits; and how policies facilitate maternity, parental and care leaves (Williams, 2010b). As mentioned, research shows how policy structures contribute to different care regimes (Bettio & Plantenga, 2004). There is arguably some convergence among countries as market mechanisms are increasingly used across corporatist (Morel, 2007, 2012), liberal and Nordic countries (Brennan et al., 2012; Lloyd & Penn, 2012; Mahon et al., 2012). However, important distinctions between care regimes remain due to differences in employment regulation and practices (Morgan, 2005; Simonazzi, 2009); migration policy (Cox, 2012; Michel & Peng, 2012; Shutes & Chiatti, 2012; Williams & Brennan, 2012; Williams & Gavanas, 2008) and local and individual values and practices (Duncan et al., 2004; Randall, 2004; Teppo, 2010; Vincent, Braun, & Ball, 2008). National and local values and attitudes are therefore also integral to the classification of care regimes.

Cross-national research (Budig, Misra, & Boeckmann, 2012), and studies in Australia (Evans & Kelley, 2002; Hand, 2005; McDonald, Bradley, & Guthrie, 2005; Meagher, 2007b; Pocock, 2005), the United Kingdom (Duncan et al., 2004; Vincent et al., 2008) and Canada (Canadian Council on Learning, 2009; Environics Research Group Limited, 2006; Ghalam, 1997), respectively, confirm the relationship between policy, attitudes

and child care practices. Care regimes classifications embrace a broad array of policies and practices, including embedded norms and attitudes. Thus, while increasing attention is given to these variations, less is written about *why* countries develop different care policies. Here, culture is recognised as "the missing variable for understanding the preferences and behaviour of welfare actors" at the macro and individual level (Van Oorschot et al., 2008, p. 9).

'Welfare culture' is increasingly identified by scholars as a concept to connect policy and culture (Duncan, 1995; Pfau-Effinger, 1998; Van Oorschot et al., 2008; Williams, 1995), and is especially useful to examine how welfare states 'care' (Duncan et al., 2004; Kremer, 2007; Leira & Saraceno, 2002; Pfau-Effinger, 2005b; Williams, 2010b). Thus, the cultural ideas embedded within a welfare state, referred to as 'welfare culture' are critical to explaining cross-national differences in child care arrangements (Pfau-Effinger, 2005a, pp. 6-7), where welfare culture is:

> [the] stock of knowledge, values and ideals to which the relevant social actors, the institutions of the welfare state and concrete policy measures refer, thereby situating policies within the societal context of the welfare state (Pfau-Effinger, 2005a, p. 4).

As introduced in Chapter 2, this body of research is based on assumptions of welfare regime literature, but also challenges these assumptions by demonstrating the critical role of culture, ideas and norms in explaining differences between and within regimes. The concept of welfare culture considers how culture influences social policy and, conversely, how social policy influences individuals' values and attitudes about work and welfare (Van Oorschot et al., 2008).

'Care culture' is a related concept that emphasises the importance of identifying cultural norms in caring roles constituted through gender, class, place and ethnicity (Duncan et al., 2004; Williams, 2010b). Williams and Gavanas define *care culture* as:

> dominant national and local cultural discourse on what constitutes appropriate child care, such as surrogate mothers, mothers working and caring part-time; international help; shared parental care, or professional care (2008, p. 16)

Other scholars have proposed frameworks for analysing care arrangements, which are based on attitudes toward the most appropriate care for young children. For example, Pfau-Effinger's (2005c) framework proposes that cultural values, including those in relation to family, gender and care, and the welfare state, have an iterative relationship with institutional structures, actors, and social structures. Monique Kremer's 'ideals of care' framework is used to examine European countries' shift from traditional male breadwinner models of care to four diverging orientations toward support for different domains of public/private, informal/formal, familial/market and professional care (Kremer, 2006, 2007). These four ideals, also mentioned in Chapter 2, are: professional care, care by a surrogate mother, intergenerational care, and parental sharing. As the previous chapter discussed, the concept of 'care culture', or 'ideals of care', focuses on cultural dimensions of the welfare state, however they do not ignore the importance of structural factors shaping outcomes, including gender and class inequalities produced through different care regimes (Kremer, 2007; Williams, 2010b).

Analyses of social stratification and inequalities are central to welfare regime analyses, and scholars have illustrated how social policies challenge, reproduce or compound class, gender and racial inequalities and shape (or reshape) new typologies or 'inequality regimes' (Korpi, 2000; Orloff, 1993; Shaver, 1990; Williams, 1989, 1995). While limited attention has been given to the relationship between inequalities and cultural aspects of welfare states (But see Williams, 1989, 1995), recent contributions to the field encourage engagement between gender theorists and ideational scholars to examine the intersection between ideas and categorical inequalities and also the role of identities and gendered cultural assumptions (Béland, 2009a; Orloff & Palier, 2009). Furthermore, Williams and Gavanas' definition of care culture as "discourses on what constitutes appropriate child care" (2008) cannot be separated from a set of assumptions about embedded inequalities reflected in countries' social policies.

Cross-national analyses of welfare state policies often draw on theories of institutionalism to compare and analyse policy trends and the interaction of movements and groups of individuals (Pierson, 2000b; Thelen, 1999). The assumptions and norms that shape welfare and care cultures are grounded in broader theories of institutionalism, where policy legacies and cultural norms are the basis for explaining policy change and

continuity. Theories of institutionalism therefore offer a lens through which to examine why different social policies have developed in different ways, to explore the potential relationship between assumptions and categorical inequalities in a comparative perspective. The next section presents different approaches to institutionalism and how they inform the theoretical framework.

Institutionalism: structure, culture and embedded care norms

Theories of institutionalism offer a lens through which to consider the development and outcomes of contemporary in-home child care in the three country studies. Institutionalist theories complement comparative welfare regime theories – including care regimes – and also inform and underpin the methodological approach, discussed later in this chapter. Institutional scholars are concentrated in political science, however theories also developed from sociology, economics, and policy studies (Peters, 2011). Institutionalist scholars identify up to nine[7] different strands of 'new' institutionalism; however, rather that determine "what counts most", Lowndes and Roberts argue that institutionalism should aim to understand how the rules, practices and narratives are interrelated. These three 'modes of constraint', identified by Lowndes and Roberts, broadly align with this study's focus on policy, norms and ideas/discourses. It is therefore suggested that distinguishing and selecting one specific school of thought is not necessarily an effective theoretical approach. Rather, a 'third wave' of institutionalist scholarship proposes that it is the "way regulative, normative and discursive mechanisms work together" that should be examined (Lowndes & Roberts, 2013, p. 50).

---

[7] The nine streams identified are: normative institutionalism, rational choice institutionalism; historical institutionalism, international institutionalism, network institutionalism, discursive (or constructivist) institutionalism, and feminist institutionalism (Lowndes & Roberts, 2013, p. 31).

From this basis, three institutionalist approaches[8] inform this comparative social policy research study: historical, normative/sociological, and discursive. These theories of institutionalism are used in combination with comparative welfare regime literature to offer an overarching theoretical framework through which to examine the structural and cultural aspects of in-home child care policy in three countries (Béland, 2005; Hall & Taylor, 1996; Peters, 2011; Schmidt, 2008, 2011). These institutional approaches are introduced below, followed by an explanation of how they contribute to the study's theoretical framework and methodology.

Historical institutionalism is defined as the formal or informal procedures, routines, norms and conventions embedded in the organisational structure of the political economy where particular attention is given to the influence of previous events and decisions – also referred to as 'path dependency' (Hall & Taylor, 1998; Pierson & Skocpol, 2002; Thelen, 1999). Steinmo acknowledges the strength of Historical institutionalism in relation to how classical political scientists and sociologists embraced the approach. They "explain[ed] real-world outcomes, using history as an analytic tool, and they were strongly interested in the way in which institutions shaped political outcomes" (Steinmo, 2008, p. 122). There is crossover with the normative approach in terms of the emphasis on embedded norms and with the discursive approach's focus on ideas (Peters, 2011; Schmidt, 2011), where both ideas and norms are often embedded historically through informal and formal institutions.

Normative & sociological institutionalisms are arguably the foundational approaches developed to challenge traditional rational choice approaches to political science. Introduced by March and Olsen (1989), the normative approach explains the structural role of norms and values as they are entrenched in formal and informal institutions. These are referred to as the "rules and routines". Steinmo suggests that sociological

---

[8] Normative and sociological institutionalisms share many commonalities and for the purpose of this framework are incorporated as one approach.

institutionalists believe institutions "frame the very way in which people see their world and not just rules within which they try to work" (Steinmo, 2008). According to Peters, sociological institutionalists (compared to normative scholars) define institutions more broadly than normative scholars, which emphasises a cultural explanation based on shared attitudes or values, but is often attributed as the "intellectual roots" to March and Olsen's normative approach (Peters, 2011, p. 141). Peters also points out that a sociological approach is better at explaining the *processes* of institutions, compared with political science approaches' (including historical and normative institutionalisms) attention to the *effects* of the processes. Overall these two institutionalisms inform the idea that that institutions shape individuals' 'logic of appropriateness' and what they 'ought to do'.

Discursive institutionalism (the newest of the institutionalisms) emphasises the role of ideas in institutions (Schmidt, 2011). The focus on ideas and paradigms are more adaptable than the other approaches and are adopted by sociology, political science and policy studies scholars (Peters, 2011, p. 115; Schmidt, 2008, 2011). As an approach, discursive institutionalism is the most interested in the 'role of meaning' in institutions (Peters, 2011, p. 129). According to Schmidt, the three traditional institutionalisms[9] (historical, rational and sociological) are limited in their ability to explain change and therefore discursive institutionalism offers explanation for change and continuity through ideas and discursive interaction. Thus discursive institutionalism also offers a link between institutional theories and the methodological approach to analysis, outlined later in this chapter.

Historical and sociological institutionalisms share the common trait of seeing institutions as "rules that structure behaviour" (Steinmo, 2008, p. 126). Theoretically, historical institutionalism emphasises that welfare state policies reflect incremental

---

[9] Some scholars view the normative approach as a substitute to the sociological approach and therefore would also be included in the group of traditional institutionalisms

changes that occur through interactions between structure and culture, both of which are embedded in path dependent legacies specific to each country (Pierson, 2000a), and which can develop in contradictory ways (Kremer, 2006). Historical institutionalism is most closely related to the logic of comparative welfare regimes (Pierson, 2000b; Streeck & Thelen, 2005) and therefore historical institutionalism is particularly important for framing a comparative analysis of the transformation of ECEC and in-home child care in the three selected liberal welfare states. Choosing three countries from the liberal welfare regime allows for critical analyses of the origins of child care arrangements and the actors and movements involved. Historical and normative/sociological institutionalisms are particularly important to examine the historical origins and cultural norms that influence the transformation of ECEC and in-home child care. Normative/sociological institutionalism, together with discursive institutionalism, is also important to consider the ways government supports in-home child care through values, attitudes and norms expressed in rhetoric. A normative approach's focus on effects, opposed to process, contributes to our understanding of how embedded norms and cultures differ across the three countries, and how these cultures are reflected in child care arrangements. This is particularly relevant to Aims 1 and 2, which address the transformation of in-home child care in relation to different political, social, demographic and discursive contexts.

Discursive institutionalism (Schmidt, 2008, 2010) is adopted to inform my analysis of the place of ideas in policy change and policy divergence. Discursive institutionalism emphasises the importance of ideas and discourses in shaping actors' interests and the development of alternatives for policy change. Discursive institutionalism (in addition to feminist institutionalism) arguably goes beyond the 'traditional institutionalisms' (historical, sociological and rational) to explain the role of ideas, political interests and culture in institutional change. Daniel Beland's contribution to historical institutionalism is centred on the critical role of ideational processes in understanding policy change. By linking political science and sociological literature on ideas and frames, respectively, he does not contend that scholars need to abandon institutionalist perspectives, but rather proposes that ideas are central to both structural and normative explanations for policy development. Rianne Mahon also points to the role of ideas in shaping different strands of liberalism, and therefore variations across liberal welfare

states and within countries over time. As Mahon suggests, while historical institutionalism is still useful for understanding policy continuity, there are different ideas that contribute to 'varieties of liberalism', namely classical liberalism, social (or new) liberalism, neo-liberalism, and inclusive liberalism. Building on O'Connor et al (1999), Mahon uses Canada as an example to explain how policy change reflects different policy ideas and approaches. Social (or new) liberalism informed early developments of the Keynesian welfare state and, today, is most evident in Scandinavian countries. Neo-liberalism developed in response to austerity measures in the 1970s and 1980s and has more similarity with classical liberalism and conservative ideas of small government. It focuses on productivity, employment and means-tested assistance. Inclusive liberalism, Mahon argues, follows a different path to neo-liberalism, which rests on greater commitment to learning, training and basic entitlements, including ECEC policies. Social investment – a concept underpinning analysis in Chapter 6 – is central to developments in ECEC policy across Western countries and has strands of neo-liberalism and inclusive liberalism (Mahon, 2008). These varieties are reflective of different approaches to social policy and can help to explain policy change and policy difference consistent with historical institutionalism.

Discursive institutionalism also informs this study's analysis in its focus on governments' rhetorical support for in-home child care and varying interpretations of policy discourses (Aim 2). Peters explains how the discursive approach gives priority to actors over formal structures, where formal structures "are secondary to the ideas that are held by the members and the communications that occur within the structures" (p113). The importance of ideas and norms is shared with the normative approach, however an important distinction is made: the normative approach places greater emphasis on top-down processes for change (p114), compared to the discursive approach where change can occur from below. In thinking about cross-national analyses of care culture it is important to incorporate both approaches to institutionalism in order to account for pressures from above and below. Fiona Williams' framework is useful for thinking about the differences in claims from above and below; and how claims from below contribute to changes to care policy (Williams, 2009, 2012a). For example, she illustrates how mothers make gender equality claims for rights as earners by calling for the redistribution of caring responsibilities from the family to the state and the

market. At the same time, migrant caregivers' claims for rights as workers call for recognition of their caring work through training, fair remuneration and working conditions. This is particularly relevant for Aims 2 and 3 which consider how the interaction between policy structures and normative understandings of the purpose of in-home child care (Aim 2) have implications for the inequalities experienced by and recognition given to different groups of stakeholders (Aim 3). The concept of care culture (or ideals of care) are informed by all four of the institutionalisms described above: policy histories (historical institutionalism), norms and values (sociological and normative institutionalism), and ideas (discursive institutionalism) are central to explaining how and why countries develop different gender regimes and care cultures, and how they shape individual behaviours.

While this study focuses on interactions at the institutional level (Williams, Popay, & Oakley, 1999, Ch 8), it is important to recognise the place of individual values and behaviours, and the collective impact they may have on influencing welfare culture and national, or local, ideals of care (Himmelweit & Sigala, 2004). Simon Duncan et al (Duncan, 1996, 2005; Duncan & Edwards, 1997; Duncan et al., 2004; Duncan & Irwin, 2004) and Carol Vincent and Stephen Ball (2006) show that the choice of informal care is not only a result of structural factors, such as low levels of formal care provision; rather trust, commitment and a shared understanding of children's happiness are also main reasons why parents preferred informal over formal care (Duncan et al., 2004; Land, 2002; Skinner & Finch, 2006). These scholars reject the idea that choices are purely rational, based on structural constraints, as argued by Hakim (2000). Instead, decisions are "both very rational and very emotional" (Ball & Vincent, 2005, p. 565), and are based on individuals' 'gendered moral rationalities' (Duncan, 2005; Duncan et al., 2004). However, a gendered moral rationality approach is less useful for this study's focus on institutional structures and embedded norms, and analysis is therefore informed by cultural and structural institutionalisms (Taylor-Gooby, 1998; Van Oorschot et al., 2008). Instead, gender is accounted for through feminist institutionalism (Mackay, Kenny, & Chappell, 2010) and, it is argued, can be incorporated into the four 'mainstream' institutionalisms identified above, through a consideration of feminist actors and movements in the analysis of historical processes, gendered norms about the

'appropriate' division of paid and unpaid work, and ideas about the role of women/mothers and the government in caring for young children.

As Beland argues, more attention should be given to the potential of literatures on cultural and gendered assumptions to link literatures on ideational processes and comparative social policy and categorical inequalities, such as gender, class and race. He suggests "the literature on gender and social policy enriches ideational analysis by pointing to the role of − and interaction between − cultural assumptions, social inequalities and policy regimes" (Béland, 2009a, p. 568). From this perspective culturally embedded ideas about the appropriate form of care are critical in shaping political actors and the public's views about policy stability or change. The concept of care culture therefore informs analyses of ideational shifts. It draws on different strands of institutionalist theory and also accounts for the interaction between social inequalities and policy regimes. The theoretical frameworks introduced above are closely linked to the structural and normative methodological approach, discussed below.

Methods

Building on the theoretical framework, this section details the methods used to address the research aims and questions presented earlier. The concept of care culture does not ignore the relationship between structure (or policy) and the norms and values that contribute to different care ideals. Similarly, historical and normative institutionalisms also account for the interaction between structure and culture in explaining policy change and variation. With this as a starting point, the first method is a comparative policy analysis of the structures and mechanisms shaping in-home child care in each country.

Comparative policy analysis

Comparative welfare regime theory identifies broad trends in the provision of care policies, including the different ways governments support gender roles and care arrangements. The generosity and eligibility requirements for funding (including tax measures and cash benefits) and the regulation of care settings and care workers are central to analysis of different types of ECEC in each country. A review of the literature also pointed to the need to incorporate migration policy in an analysis of in-home child care. Australia, the UK and Canada are grouped together in the liberal regime; however

examination of policy details in these areas aims to uncover important differences with respect to ECEC, particularly in-home child care. As Jenson and Sineau point out, while most liberal countries increased their spending on ECEC since WWII,

> it is the details of the services, the eligibility rules, the forms of delivery, and their potential consequences for fostering equality or entrenching equalities that matters (Jenson & Sineau, 2001, p. 5).

The policy analysis component requires a thorough review of the eligibility requirements, funding streams, generosity and regulations for in-home child care (Aim 2). The policy environments differ in each country and, so, the first step is to apply a consistent definition of in-home child care – *government supported, non-familial, care provided in the child's home* – to determine the scope of analysis in each country. National and jurisdictional policies are analysed and compared through a mix of primary and secondary sources, including

- international and national databases on expenditure, usage and regulations for ECEC and in-home child care;

- departmental websites with information about funding and regulation of different forms of ECEC;

- departmental policy announcements and strategy papers;

- government and non-government sources documenting policy and reforms regarding immigration; and,

- academic analyses of policy funding and regulation

Documentary analyses allows for extensive examination of various aspects of policy design and government objectives. Resources available online, particularly in the last ten years makes possible the collection and review of these documents. However, challenges and limitations to documentary analysis remain, particularly for a comparative study. The sources (i.e. websites/departments) are not consistent across the countries and the nature and availability of information varies. In some cases policy documents are not available online, meaning that selection of documents was, at times, skewed in favour of those easily available. Additional effort was given to locate key

historical documents (i.e. Royal Commissions and other landmark policy agendas) at university and other research libraries in each of the study countries.

While ECEC data and policy mechanisms inform one aspect of the cross-national approach to analysis, they do not explain the development of different care arrangements. Policy analysis also involves an interpretive element (Bacchi, 2000; Yanow, 2000), which considers the potential tensions and contradictions between policy rhetoric and practice. This interpretive element is gained through examination of documentary analysis, and also gives agency to policy stakeholders, discussed later in this chapter. Discursive analysis of policy ideas and objectives, in combination with examination of reforms to policy design, therefore offers a valuable methodological approach to my research.

Discursive analysis

Discursive analysis is the examination of ideas and paradigm shifts, and it pays particular attention to the context of these ideas (Béland & Cox, 2011). This methodological approach draws on 'discourse analysis', however there is wide variation in understandings of what 'discourse' and 'discourse analysis' consists of (Bacchi, 2000, 2005). Discursive analysis, for this study, therefore focuses on the role of actors, discourse, political and social context in primary and secondary sources. The analytic process is informed by two methodological approaches: a Foucauldian-inspired discourse analysis and Carol Bacchi's 'What's the problem represented to be?' approach. Foucauldian-inspired discourse analysis emphasises the importance of social and historical context where the relationship between texts and social practice is mediated by discursive practice (Fairclough, 2002; Jorgensen & Phillips, 2002, p. 69). In a Foucauldian-inspired discourse analysis the key assumption is that discourses are contested and it is important to identify how discourse exemplifies conflicts over meaning that are linked to power; and the establishment of regimes of truth (Jacobs, 2006). A Foucauldian-inspired approach is also used to explore the embedded norms, social and political pressures of the origins and transformation of in-home child care (Aim 1), which complements the theoretical framework presented above. This study therefore focuses on the broader context of discourse and ideas, akin to what Beland and Cox call 'ideational analysis'. Beland and Cox identify the strong relationship between

ideas and cultural assumptions and, in line with this relationship; these cultural assumptions can be examined through Bacchi's approach that seeks to identify the origins of the policy problem.

Carol Bacchi's 'what's the problem represented to be?' process draws on a Foucauldian-inspired approach in its emphasis on the social construction of meaning and social and political pressures of the origins of the problem. Bacchi proposes that policy analysis must first determine what the problem is represented to be and, secondly, what assumptions (or conceptual logics) underpin the representation of the problem (1999, 2009). Similar to the different rationales identified in Chapter 2, Bacchi uses the example of child care to illustrate how the problem can be represented as child welfare, women's workforce participation, family's choice of care, or as a public responsibility and identifies how, for example, family's choice of care is underpinned by a conceptual logic that families are responsible to care for their children.

Assumptions are often represented as binaries, such as public/private male/female or economic/social, which again links to the concept of care culture and different assumptions about gender roles and caring responsibilities across such binary lines. This offers a link to scholarship in the field of comparative gender, family and ECEC policy, and also points to the critical role of ideas in explaining policy change/continuity and policy variation (Béland, 2009a; Kremer, 2006; Lewis & Campbell, 2007b; Wincott, 2006). For example, Linda White argues that ideas are central to understanding divergences in child care policy in the two liberal countries of Canada and the United States (White, 2002, 2011a). Moreover, the relationship between ideas and discourse is critical to understanding different strands of liberalism. For example, in line with Mahon's (2008) arguments, introduced earlier, governments can (and do) make policy decisions that take them down different liberal paths – toward social, neo- and inclusive liberalism. Analysis of ideas and discourses therefore offers a lens through which to think about how policy design reflects different views about appropriate forms of care. Within liberal countries, the separation of the public/private domains is central to this analysis.

Overall, a focus on ideas, through discursive analysis, links findings from the other two methods (structural policy analysis and key stakeholder interviews) and blends the methodological and theoretical approach. Discursive analysis focuses on the construction of the origins and histories of in-home child care in three countries (Aim 1) and uses historical institutionalism as a methodological process, which adopts the view that "careful reconstruction of historical sequences" is required for comparative analyses of welfare state policies (Pierson, 2000b, p. 815). This analysis adopts a more Foucauldian-inspired approach, which is less systematic and gives more attention to the social and political debates (Jacobs, 2006). This is consistent with Beland's ideational processes approach that considers how ideas are reframed and interpreted differently over time (Béland, 2009a, 2009b; Béland & Cox, 2011). As discussed above, theories of discursive institutionalism also support the critical role that ideas and rationales play in policy change, and inform the analysis of governments' policy and rhetorical support for in-home child care (Aim 2). A discursive approach to analysis informs our understanding of the shifting rationales for ECEC, particularly the adoption of 'social investment' in the 1990s.

Bacchi's approach to policy analysis is particularly useful for asking how governments' support for in-home child care fits within their broader ECEC goals and rationales (Aim 2). However, in combination with the Foucauldian-inspired approach, it also helps to examine the transformation of in-home child care policy and offers a framework for analysing how policy agendas are interpreted by actors, and shaped by institutional and societal norms (Aims 1 and 2). Drawing on theories of normative and discursive institutionalism, Bacchi's analytical approach pays particular attention to tensions and inconsistencies among actors from above (policy elites) and from below (movements, interest groups) to analyse different interpretations of the policy 'problem' (Aim 2), and how these interpretations and policy responses affect groups of stakeholders (Aim 3).

Overall, discursive analysis, in combination with structural policy analysis provides a method for examining discourses from above and below, categorical inequalities and processes of claims making, which are central to analysing the interaction between policy structures, cultural norms and policy actors and movements (Bacchi, 2009; Fraser, 1989; Williams, 1995, 2012a). The final methodological component –

interviews with key stakeholders offer rich and diverse insight into contemporary tensions and contradictions between policy and discourse. The role of policy stakeholders in understanding policy change and difference are central through their interpretation of policy discourse (Bacchi, 2000) and their agency in structural and normative theories of institutionalism (Hay & Wincott, 1998).

Key stakeholder interviews

Theoretical and methodological approaches to discursive analysis both emphasise the role of actors and agency in policy change and variation. Interviews with key stakeholders therefore offer insight into the critical role that policy makers and key stakeholders play in understanding, interpreting and implementing policy ideas (Bown, Sumsion, & Press, 2009; Lewis, 2009, p. 202; Yanow, 2000). A total of sixty interviews (20 in each country) were conducted with stakeholders in the ECEC, in-home child care and nanny sectors in Australia, the UK and Canada.

Pilot interviews were conducted with key stakeholders from three different stakeholder groups (Provider organisation, peak organisation, nanny agency) in Sydney, Australia in May and June 2012. These interviews were used to modify the interview schedule. Interviews were conducted in the province of Ontario in Canada in July and August 2012. Most were in the Greater Toronto Area, with four participants from other local areas[10]. The interviews in the UK were conducted in September and October 2012, 16 were in England and 4 in Scotland. The remaining 17[11] interviews in Australia were conducted between October 2012 and March 2013. Most were in the greater Sydney area in New South Wales, and three were conducted in South Australia.

The interviews conducted were semi-structured and varied in length from 25 minutes to almost 2 hours. Most were between 45 and 55 minutes. Participants were recruited

---

[10] One participant was a federal representative based in the province of Manitoba, but interviewed over the phone
[11] 3 pilot interviews were conducted in May and June 2012

through email and phone contact. They were first introduced to the project and asked whether they or anyone else they knew in a similar position were interested in participating (Appendix C). An information and consent form was sent which included further detail about the types of questions that would be asked and the approximate duration of the interview. Information about ethics approval and complaints, and a consent and withdrawal form were attached. All participants signed the consent form, which gave their consent to use the information they provided, but does not give approval to use their names of organisations. As stated in the consent form, "in any publication, information will be provided in such a way that you cannot be identified" (Appendix A). While many participants verbally stated they were happy to have their name used, many did not as well.

The recruitment process was time consuming, with significant travel within each of the countries visited. In total, 89 participants were contacted. Of the 29 contacted who were not interviewed, 9 declined with reasons related to time constraints or not feeling they had the knowledge to participate. A further 9 participants agreed in principle, but after multiple follow up calls and emails there was either no response or we were unable to coordinate a time to conduct the interview. The other 11 participants contacted never responded to emails or follow up phone calls. By country, 4 stakeholders in Australia, 17 in the UK and 8 in Canada were contacted but did not participate. Over half of the non-participants that were contacted (3 of 4 in Australia, 9 of 17 in the UK and 4 of 8 Canada) were from nanny agencies. This shows that the majority of other stakeholder groups did agree to an interview when first contacted. There were more time constraints for the fieldwork conducted in Canada and the UK and therefore I recruited alternative participants, who I believed had a similar background in the sector (i.e. nanny agency). In Australia, I was able to be more flexible with the timing, which partly explains the lower number of stakeholders who were contacted but did not participate.

The recruitment strategy aimed to generate a mix of representatives from each country including: Government[12], peak organisations[13], provider organisations[14], and nanny agencies and associations[15]. A fifth group, key informants, was added where participants did not fall in the other groups. The distribution of participants was fairly even among and within the countries, with Australia having more participants from peak organisations, many whom were leaders in the ECEC sector and therefore also considered key informants. In all three countries there was some crossover where participants were representatives of two of: peak bodies, provider organisations and nanny agency/association. These participants were grouped according to the avenue of recruitment and location of meeting, which often was a reflection of what 'hat' they were wearing. Table 4, below, outlines the distribution of key stakeholders across countries and sector groups.

---

[12] Government representatives included public servants, ministries at the local and national level, and also government agencies and authorities responsible for regulation and monitoring.

[13] Peak organisation refers to non-government organisations that represent service provider organisations and/or ECEC/care workers in a specific sector. It is defined as "an advocacy group, an associated of industries or groups with allied interests". They are generally established for the purposes of developing standards and processes and to act on behalf of members (Fitzgerald, 2006). For this study, membership and professional organisations were also included in this group (including unions).

[14] All provider organisations included in the study provided multiple services, including home-based care (not necessarily in-home child care). They were selected because of their reputation at national/provincial levels in providing ECEC services across multiple settings. Many of them were also involved with training ECEC workers.

[15] Nanny agencies and associations were grouped together for the purpose of identifying stakeholders in this study. In some circumstances, 'nanny associations' also could be classified as 'peak organisations', representing nannies and in-home child care workers.

Table 4: Key stakeholder interviews, by country and affiliation

	Australia	United Kingdom	Canada
Government representative or National authority	4	4	3
Provider organisation	4	4	4
Peak organisation	7	5	4
Nanny agency/association	5	5	5
Researcher and/or other key informant	0*	2	4
TOTAL	20	20	20

*While there were no Australian interviewees identified as 'Researcher and/or other key informant', 2 of the representatives in the 'Peak organisation' group could be included in either group.

The interviews covered four key topics (see Appendix B) designed to elucidate the interviewee's understanding of the role and functions of the department/organisation within the ECEC sector, and how they view their role in advocacy and policy making; and the role of the government in supporting different types of child care and ECEC.

- Role and function of department or organisation
- ECEC policy and advocacy
- Attitudes toward in-home child care
- Role of government in ECEC and in-home child care

The data collected were diverse and rich in all three countries. Not all participants addressed each topic area; however data for each topic and from each country and group of stakeholders were fairly evenly distributed. Differences in the types of topics covered are reflective of the diverging policy contexts and knowledge and interests of the stakeholder groups. As expected, some issues were more salient among some groups and countries. Thus, while the topics above, and questions listed in Appendix B do not explicitly ask about the role of migration in in-home child care, the issue was raised by the participant in many circumstances and, where it was not, I probed participants for their views as part of broader questions about governments' role in funding and regulating in-home child care. As will be discussed in later chapters, the issue was very salient among some stakeholders, but shied away from by others. This, in itself, was a finding that distinguished the country and affiliation of the stakeholder.

Twenty interviews (cross-country and cross-group sample was selected) were initially transcribed and coded in NVivo (Appendix D). Following this exercise, the nodes were restructured and the remaining interviews were transcribed and coded according to the updated coding structure. The interviews were imported into NVivo as cases and assigned characteristics to distinguish between i) country and ii) organisation/affiliation. This allowed me to analyse data across all stakeholders from one country in a particular node or to compare data from one group of stakeholders (eg. Nanny agencies or government representatives) across countries. Parent nodes were grouped by 'policy description' and 'thematic issues' which facilitated efficient analyses through coding queries and searches. Queries were used to explore and compare the frequency of different themes across countries and by stakeholder group.

The descriptive nodes were developed to align with the research questions, where stakeholder descriptions of policy, ECEC issues and the place of nannies and in-home child care contributed to data from the policy and documentary analysis (see Appendix D). Information coded to the descriptive nodes supported much of the data examined in the previous two methods, and often pointed to further detail that was used to answer research questions 1 and 2, which mostly fed into discussion in Chapters 2, 5 and 6. The 'policy influences' node also provided data related to question 2 and 4, complemented much of the data collected from historical and contemporary documents, and contributed interesting anecdotes and examples. Data from these nodes fed into Chapters 4 and 6. The thematic nodes were developed through an iterative process as the interviews were conducted and transcribed. While coding the interviews, nodes were added or revised to reflect emerging issues and themes across countries. In some circumstances, particularly the themes of 'recognition' and 'professionalism' that were more evident in some countries than others, further examination of policy documents and discourse was conducted to better understand when and how these themes emerged in the sector in each of the study countries, and how policy did or didn't align with these discourses. These findings directly feed into Questions 2 and 3, and the discussion in Chapters 6, 7 and 8. Following the completion of coding all the interviews, the thematic nodes were re-examined to ensure a consistent and comparable framework for analysing the data. While some of the data was moved across nodes, no further changes to the nodes were made.

NVivo was therefore used to organise findings from the fieldwork interviews and to identify the prevalence of themes and broad links between themes and country/stakeholder group affiliation. Once these themes and connections were made, most of the analysis was completed on hard copies. The findings from the interview data were analysed in relation to findings from the policy and documentary analysis; however themes previously not identified in the literature review and policy analysis (namely formalisation, professionalisation, and recognition) informed further review of literature, theory and documentary analysis. In this way, findings from the fieldwork supported findings from the literature review and policy analysis, and also opened up new avenues for analysis, leading to an iterative analytical approach. The stakeholder interviews were designed to complement the research findings from the policy and documentary analysis. Key stakeholders were selected because of their potential to identify new themes and issues related to the emergence of government support for in-home child care and the way it is situated within the broader ECEC sector. It should be emphasised that the interviews confirmed much of the findings from the policy and documentary analysis and provided insight into specific aspects of policy detail and debate.

Justification for analytical approach

This chapter presented the analytical approach to the study – both the literature and theories that informed the analysis, as well as the methodologies and sources used. As outlined in the theoretical framework, theories of institutionalism and comparative welfare regimes contend that different interpretations of policy discourses often reflect divergences in embedded norms, or welfare culture (Pierson, 2000b; Pierson & Skocpol, 2002; Van Oorschot et al., 2008). Cultural attitudes toward care, and individual and societal 'ideals of care', are integral to comparative policy analyses (Kremer, 2006; Lister et al., 2007; Pfau-Effinger, 2005a, 2005c; Saraceno, 2011; Sjöberg, 2004; Williams & Gavanas, 2008). This body of literature identified culture as a critical factor influencing the development of policy reforms, and the embedded norms underpinning these reforms (Duncan, 1999; Duncan et al., 2004; Hantrais, 1999; Pfau-Effinger, 1998, 2005a; Saraceno, 2011; Sjöberg, 2004; Van Oorschot et al., 2008).

As a cross-national policy study, the research is informed by comparative welfare regimes theories, and related literature on gender and care classifications. The three countries chosen for the study are all regarded as liberal in welfare regime theories. The reliance on markets that squarely group these countries together in welfare regimes typologies is also relevant to gender and care regimes, the separation of paid and unpaid work, and the division between public and private responsibilities for care. While Australia, the UK and Canada are influenced by common liberal ideas about welfare restructuring, the cultural, social and political contexts are shaped by different movements and actors and at various points in time. The main directions and goals of movements were largely shaped by collective beliefs, mobilisation of advocacy groups, and negotiations about what is best for mothers and children (Michel & Mahon, 2002). These three countries were selected for the similarities identified above, but also for the differences related to gender logics (O'Connor et al., 1999) and variation in the development and design of ECEC and in-home child care policy. For example, trade unions and lobby groups played a significant role in Australia; trade unions and local employers influenced the trajectory of child care in the UK, and federal-provincial negotiations have been identified as a key factor in progress and retreat of child care in Canada (Brennan, 2002; Mahon & Phillips, 2002; Randall, 1995, 1996). Also, there are clear differences in the way funding mechanisms and regulation includes and excludes formal and informal care, which is often overshadowed in comparative ECEC research that focuses on mainstream, centre-based ECEC (detailed in Chapter 5). These countries were also selected because there are distinct differences in relation to how migration policy facilitates the hiring of in-home child care workers. That is, there is minimal immigration policy relevant to in-home child care in Australia, regional EU policy guides immigration in the UK (and this changed in the 2000s) and, in Canada, a specific migration scheme is available for live-in caregivers.

Australia, the UK and Canada are large countries and each has different jurisdictional governance structures. In Australia, policy related to in-home child care is set by the Commonwealth or federal government (although preschool is governed and largely funded at the state level); therefore most analysis is based at the federal level. However, interviews conducted in South Australia point to key differences in the practices of in-home child care and family day care, as pointed out where salient throughout the

chapters. In the UK, two jurisdictions (England and Scotland) were chosen to examine whether and how care culture might differ, even though much of the ECEC policy design is the same in both countries. However, it should be stated that, the emphasis of the analysis is on England, and where notable, differences in Scotland are presented. As mentioned, in Canada, the province of Ontario was selected as the primary focus. It is the most populated province, it is considered a "child care policy pioneer" in Canada as the province's child care advocacy groups have been historically influential in shaping federal movements, and it has the most number of Live-In Caregivers (Mahon, 2013). While nannies are increasingly common in other provinces, in Ontario (and particularly the city of Toronto) there is demand for nannies and in-home child care because of the relatively high number of mothers participating in the labour force (participating in higher income jobs than regional and rural counterparts) in addition to the lack of available, affordable(and regulated) child care spaces (Friendly et al., 2013).

In addition to these distinguishing points that make it an appropriate selection for an analysis of in-home child care, many of the demographic characteristics of the population and features of the ECEC sector and are broadly representative (or near the average) of Canadian figures. In particular, the maternal workforce participation rate for children 0 to 5 years, and the proportion of children 0 to 5 years for whom there is a regulated child care space are broadly comparable to the Canadian average. In Ontario, the maternal workforce participation with children 0 to 2 years is 70.6 per cent, compared with 69.7 per cent in Canada; and, for children 3 to 5 years, 75.3 per cent of mothers in Ontario are employed compared with 76.7 per cent in Canada. In terms of ECEC availability, there are regulated spaces for 20.8 per cent of children 0 to 5 years in Ontario, and for 22.5 per cent of this same age group across Canada (Ferns & Friendly, 2014).

A detailed analysis of the pressures, actors and movements – and associated ideas and discourses – influencing ECEC policy contributes an explanation for how and why demand and support for in-home child care evolved. Discourses have the potential to reshape attitudes about the appropriate care and education arrangements for young children, but ideas and discourses can also further embed norms (Kremer, 2006; Lewis, 2009; Pfau-Effinger, 2005a; Williams, 2010b). Discursive analysis, therefore, draws on

theories of institutionalism (especially discursive and normative) and offers a methodological approach to examine the interaction between the historical origins and contemporary policy discourses and cultural norms. Policy makers and key stakeholders play important roles in leveraging support through policy discourses and rationales, and "discourses may also be exploited by political elites in order to alter values and models in the population" (Pfau-Effinger, 2005a, p. 10). Interviews with key stakeholders therefore offer insight into the critical role that policymakers and key stakeholders play in interpreting policy discourses (Bacchi, 1999; Bown et al., 2009; Lewis, 2009, p. 202).

As mentioned earlier in this chapter, social relations theory would also offer an interesting lens to analyse in-home child care, particularly through methods that sought the views of families and care workers themselves. However, due to both theoretical interests and pragmatic constraints this approach was not adopted. Instead, this study builds on comparative policy research on early childhood education and care at the institutional level, and broader literatures on the restructuring of care policy. Drawing on theories of comparative welfare regimes and institutionalism, the study investigates a particular topic – in-home child care – in relation to both care and migration policy. It is the first known research on in-home child care that examines in-home child care within the context of comparative ECEC policy, but which also considers the impact of migration policy on the sector. The concept of care culture offers a rich lens for cross-national care research because, not only does it account for variation in policy structures and care practices, it also considers the role of embedded attitudes about the most appropriate form of care for young children, whether professional care, informal home-based care or care by migrant workers in the child's home. The study therefore situates of in-home child care within ECEC structures and policy reforms and also in relation to policy that promotes other forms of domestic care and labour.

Chapter 4 : Policy legacies – movements, pressures and competing interests

Early childhood education and care (ECEC) is prominent on the policy agendas of many Western countries. Since the 1960s ECEC has been advocated by interest groups and key stakeholders. It has also been contested and challenged. There is a rich body of scholarship that analyses ECEC policy change, and the opportunities and constraints faced by advocates at different points of time, in different countries. However, as Chapter 2 indicated, most research focuses on formal, centre-based ECEC, with limited attention given to more informal, arrangements in the care provider or child's home. A closer look at the literature and other primary sources reveals new information about support and opposition to different forms of ECEC. This chapter examines the development of ECEC in Australia, the UK and Canada, with particular attention given to forms of in-home child care, such as nannies and *au pair*s. Building on themes introduced in the literature review, it examines how collective movements, advocacy groups, and cultural norms of care evolved in each country, reflecting different histories of welfare state development and restructuring as well as the influence of different forms of liberalism at different points in time.

First, this chapter draws on research on the histories of ECEC in each country to identify the key actors and related pressures for ECEC in each country from the early 1970s to mid-1990s (Brennan, 1998; Davis, 1983; Friendly, 2000; Lewis, 2013a, 2013b; Mahon, 2000; Penn, 2009c; Prentice, 2001; Randall, 1995, 1996). This scholarship provides rich accounts of policy developments and the actors and movements involved; however less attention is given to the specific pressures for and against different forms or types of ECEC. Support for in-home child care can be attributed to both actors' promotion of private, home-based forms of care; however support is also gathered through shared resistance to centre-based care. That is, actors in opposition to universal, centre-based care may view private home-based alternatives as better aligning with their interests and ideology. This chapter aims to address a gap by identifying whether and how in-home child care is visible in ECEC (or other) policy debates and movements. An examination of literature and policy documents, and supported by interviews with key stakeholders, identifies critical differences in the origins of in-home child care in

each of the three countries. This comparison also sheds new light on explanations for differences across the broader, mainstream ECEC sector in the three liberal countries.

Pressures and movements for formal ECEC

Pressures for the expansion of early childhood education and care services aligned and diverged at various times in Australia, the UK and Canada. Since the early 1970s, advocates for formal ECEC have had differing levels of success in achieving publicly funded and provided services. Progress can be explained by a number of economic, social, political and discursive opportunities and constraints. That is, the relative successes of advocacy pressures is shaped both by their ability to unite with others, and also the size and power of actors with competing interests. Analysis of the role of actors, ideas and pressures for formal ECEC provision provides a strong foundation to examine the emergence of in-home child care.

The early 1960s is regularly noted as the period when demographic changes and new ideas emerging from the women's movement created new pressures for government involvement in the expansion of public child care services[16]. Mounting pressures through the 1960s led to significant events in the early 1970s in Australia, the UK and Canada, which offer a useful starting point for analysis: the Child Care Act in Australia was introduced in 1972; in 1971 in the UK the Women's National Coordinating Committee included 24-hour nurseries in their campaign demands (Coote & Campbell, 1987, p. 16) and, in Canada, in 1970 the Royal Commission on the Status of Women published a report arguing that child care should be seen as central to achieving gender equality. The first section provides a country overview of ECEC policy developments; the second section analyses how in-home child care specifically is talked about in key policy documents and debates during this same time period. The final section considers

---

[16] It should be noted that kindergartens have a much longer history in all three countries, mostly delivered by philanthropic organisations. For Australia, see Brennan (1998); for the United Kingdom see Randall (1995), Cameron (2002) and for Canada see (Prentice, 1996), Friendly and Prentice (2009).

to what extent in-home child care transformed as part of these ECEC developments, and how variation might be explained by embedded structures and cultural norms.

Australia

The Australian women's movement strongly focused on child care. Actors from in and outside government, Liberal and Labor[17] party supporters, and feminists and non-feminists alike found common ground in their demands for greater government involvement in the provision of child care. Feminists from the Women's Liberation Movement, the Labor party, and supporters from the Women's Electoral Lobby (WEL) believed the Commonwealth government should have a central role in expanding child care. The introduction of the Child Care Act is also attributed to demands from outside the feminist movement, particularly from Liberal women and employers supporting the need for female labour. Despite the success in introducing the Child Care Act, there was a clear reluctance on the part of the Commonwealth Government to expand child care to all children. As Brennan notes,

> The government made it clear that its goal in extending support to child care services was to address a somewhat unfortunate social necessity – not to promote gender equity (2002, p. 99)

The establishment of Government committees and the publication of reports following the Child Care Act highlight the key issues for policy debate, and the different actors involved. At the end of 1972 the Labor Government under Whitlam came to power and in 1973 Elizabeth Reid was appointed the Advisor on Women's Affairs. Her role required considerable mediation amongst competing interest groups with hopes to put forward a shared set of priorities to Government (Brennan, 1998, pp. 80-82). Elizabeth Reid is considered a champion for child care in Australia in these years. She had a

---

[17] The Liberal Party of Australia is a centre-right party loosely affiliated with business interests. The Australian Labor Party (often referred to as 'Labor') is a social democratic party linked structurally and organisationally with the trade union movement.

strong community focus for child care, believing that professionals should be "on tap, not on top" (Brennan, 2002, p. 99).

In early 1973, the Australian Pre-School Committee was established by the Ministry of Education, and the Principal of the NSW Nursery School Teachers College, Joan Fry, was appointed to chair the Committee and lead the preparation of recommendations for child care for children 0 to 6 years. There was some hostility to the appointment of Fry from community groups including the Women's Electoral Lobby and Community Child Care especially as the rather conservative Australian Pre-School Association (APA) was the only group represented on the Committee. It was believed that the APA supported more traditional models, such as half-day pre-school rather that feminist demands for universal child care (Brennan, 1998). The recommendations (The Fry Report) published in 1974 called for the concentration of resources to be put into part-time education programs for 4-year olds. The Report was criticised for its ideological bias, under which family day care (FDC) was promoted as a cheaper alternative to professional, centre-based care, provided by 'merely warm-hearted' women. These recommendations were criticised for resting on the 'values and political interests of the Committee and the Department of Education' (Apps, 1975, in Brennan, 1998, p. 86).

Following opposition from women's groups in response to the recommendations the Labor Government called on the Social Welfare Commission to prepare a new set of proposals, called *Project Care*. Compared to the Fry Report's focus on part-time education, *Project Care* recommended a much wider recognition of skills and professions, that included pre-schools, day care centres, family day care, play groups, babysitting clubs and support services for private childminders (Brennan, 1998, p. 87). Project Care took a more "cautious" approach to family day care than the Fry Report, recommending that more systematic consideration of the impacts on children is needed (Brennan, 1998, p. 89). However, in 1974, the Commonwealth government announced cuts to their projected budget and "formally endorsed family day care schemes as one of the main types of services that would comprise its child care program" (Jones, 1987, p. 90). Part of the reason for favouring family day care was that it required fewer investments in infrastructure and staff wages.

The dismissal of the Whitlam Government in 1975 reshaped the priorities of child care, reflected in a much stronger focus for the role of family in caring for children. There was also some concern that too high a proportion of funds were going to preschools, opposed to a broader range of children's services. Political and economic objectives of the coalition Liberal-National Government (under Malcolm Fraser) included cutting public programs – which were viewed as crowding out the private sector (Brennan, 1994, p98). Instead, the Fraser Government argued, public expenditure for young children's care and education should be limited to 'the needy' who were not receiving 'basic adequate care' (Coleman, 1975, in Brennan, 1998, p. 101) and, as a result, the responsibility for preschools shifted to the states (Brennan & O'Donnell, 1986, p. 43). Demographic pressures, including increasing unemployment and sole parent families encouraged the Fraser Government's 'pro-family' rhetoric, and as a result shifted spending to family and welfare services, opposed to publicly funded child care. In line with this, between 1976-77 and 1981-82, the proportion of expenditure on children's services other than pre-school education (centres and family day care used by 5.5 per cent of children) declined from 78 per cent to 44 per cent for centre-based care and increased from 7 per cent to 22 per cent for family day care (Sweeney & Jamrozik, 1982, p. 99).

By the late 1970s, the new rhetoric and spending on 'family policy' reflected the Fraser Government's views about 'appropriate' forms of care, and arguably shaped broader public understandings of ideals of care that contributed to a shift to private responsibilities for the care and education of young children – both by the family and the market. These shifts were explained by the Social Security Minister, Fred Chaney in 1981,

> I think most Australians would accept that the primary obligation for the care of children rests with parents and that the role of government is to intervene and to assist in those cases where, for a variety of reasons, the parents themselves may not be able to meet their obligations (quoted in Jones, 1987, p. 16).

In 1981, under the Liberal Government, the Spender Report (commissioned by the Minister for Social Security) examined the state of child care in Australia, and prioritised family day care as 'the most cost effective area' (Brennan, 1998, p. 110).

Family day care was promoted as the best way to meet the growing demand for work-related child care. The issue of funding for children using for-profit services was also raised, initiating a still-running debate about the financing of private for-profit services, and also the issue of means-testing for receipt of public subsidies. By the end of the Fraser era the concept of child care shifted from that of a community service towards the concept of "publicly provided care as a welfare service for the genuinely needy" (Davis, 1983, p. 88).

Under the Hawke and Keating Labor Governments (1983-1996), child care moved to a central position on the Government agenda, through shared interests by the union movement and women's groups for work-related child care (Brennan, 2002, p. 100). Shared interests for work-based child care resulted in Government subsidies to employers to expand such provision. When the Labor Party regained power under Bob Hawke in 1983, new issues were at the child care bargaining table. During the 1970s there had been little concern given to pay, primarily because (apart from pre-school teaching) the care of young children was done 'for love not money' and "workers had yet to develop a strong sense of their identity" (Brennan, 1998, p. 126).

Through the late 1980s, funding for centre-based services shifted toward family day care services, viewed by critics as a "cost-cutting exercise" (Brennan, 1998, p. 189). The Victorian Home Based Caregivers Association was outraged by this announcement, and it criticised the Government's decision to support family day care for economic reasons, rather than in recognition of the value of family day care. However, some voices within Government, including Finance Minister Peter Walsh, fiercely stated that the expansion of child care services in the previous decade could not be sustained, and that responsibility should occur within the private sector (Brennan, 1998, p. 189). Walsh's announcement brought some positive attention to the child care fight. A report from the Centre for Economic Policy Research at the Australian National University noted the economic benefits to investment in child care and provided a counterargument to Walsh's comments. This report arguably brought benefits and negative consequences to the community child care lobbyists.

By the late 1980s, there were also women's groups advocating for tax deductibility for child care expenses, driven by professional women's organisations that argued child care was a legitimate expense for working parents (Brennan, 1998, p. 179). It is similar groups of women's organisations that, over the past decade, have supported the subsidisation of in-home child care (Australian Women Chamber of Commerce & Industry, 2013), discussed further in Chapter 6. Achievements in the 1970s towards a progressive, community based program encouraged by alliances between feminists, trade union leaders and Labor Governments were overshadowed by the end of the 1980s (Brennan, 1998, p. 109).

The 1988 Childcare Strategy latched on to findings from the Centre for Economic Policy Research, and opened doors for new funding approaches and private sector actors to enter the stage (Brennan, 1998, pp. 190-197). The Strategy proposed to meet all demand for work-related child care by 1990. It created space to make a case for commercial providers and also maintained the economic rationale for supporting family day care because it was more cost effective. However, the capacity of services (centre- and home-based) to deliver affordable, flexible care diminished under financial constraints spurred by per capita funding (in place of capital funding) and increasing expectations for standards and accountability (Jones, 1987). Family day care providers' autonomy was restricted in the sense that they were required to report on children's attendance and service standards. These are acknowledged as positive criteria for any person receiving public funds to look after children, however, with a lack of proper funding, these changes also constrained caregivers' autonomy and capacity to deliver services to meet the needs of families in their community. Furthermore, the union movement's push for fairer wages and working conditions interested family day care workers, too. Some family day care workers expressed their discontent with the wages and working conditions, particularly the inconsistency in pay and divisions between 'professional' coordinators and 'caregivers'. The status and wages of family day care workers were compounded because they were self-employed, with little justification to be treated as employees (Brennan, 1998, Chapter 6). The next section examines how the restructuring of family day care contributed to the lack of support for in-home child care in the 1970s and 1980s, and to the formal In Home Care program introduced in the late

1990s. Chapter 5 also gives more attention to the structural changes through the 1990s that established the primacy of the market for the delivery of ECEC in Australia.

United Kingdom

Through the 1970s and 1980s in the United Kingdom debates about ECEC were strictly divided by domains of care and education. Even within these domains distinctions were made between care for parents who chose to work and parents who were deemed unsuitable to care for their children. Government involvement in the provision of early education received acceptance across the political divide during the 1970s, while responsibility for care remained a private family matter (except for the most needy) (Lewis, 2013b). The absence of government support for child care is arguably due to an 'ideology of motherhood' upheld following the closure of day nurseries after the war (Randall, 1995). It was also due to the ambiguous place of child care by the Women's Liberation Movement, and debate about the role of the state in providing child care. While feminists in Australia turned to the central government for support, some feminist groups in the UK (and also in Canada, discussed next) were sceptical about the government's involvement in meeting their demands. For example, the demand for 24-hours nurseries in the 1970 campaign divided the Women's Liberation Movement because it attached feminism to motherhood, and many radical feminists sought to liberate women from these traditional roles (Black, 1998; Coote & Campbell, 1987). Advocates for child care did not demand involvement from the central government in the 1970s; instead they sought solutions through the voluntary and private sector.

Though women's workforce participation increased in the decades following WWII (Cohen, 1993), the assumption of the male breadwinner model in part explains the limited pressure to increase public responsibility for the provision of child care services while mothers worked. Even in 2012, in interviews with key stakeholders in the sector it was found that embedded norms and a "patriarchal view" is still perceived as a hindrance to achieving public support for child care and early education. As one stakeholder stated:

> [the] whole notion in the 1950s that there were two parents and two children and the perfect family of four, it has really hampered the development of the early years for some time (Provider organisation, UK-01).

The Women's Liberation Movement in the 1970s advocated for the expansion of full-day care for all children; however it was localised and varied considerably across the country. 'Self-help' playgroups were established by parents at the local level, often with council support. These playgroups were mostly organised and attended by middle-class families (Finch, 1984), although they were in principle inclusive of working parents (Coote & Campbell, 1987). Full-time care in day nurseries was limited to children in need, particularly in "unfortunate" circumstances (Penn, 2009c), while childminders were considered the most appropriate for working parents.

From the early 1970s (and earlier) part-time nursery education was promoted by the Government and a number of sector interest groups as an extension to the education system. The Plowden Report on primary education, published in 1967, recommended the expansion of mainly part-time nursery education and did not propose any full-time services to facilitate mothers' employment. The Report informed sector discussion through the early 1970s and helped to maintain the status quo, and uphold the attitudes of Government committees and civil servants in the Ministry of Health and later Social Security (Lewis, 2013b). The 1972 White Paper on Education, announced by the then Minister for Education under the Conservative Government, Margaret Thatcher, proposed an expansion in part-time nursery education for 3- and 4- year olds. While this policy initiative was, two years later, revoked under financial pressures, it set the tone for the following decades by signalling a debate between groups pressuring for expansion of education, opposed to care, for young children.

Faced with financial (and ideological) constraints, by the mid-1970s Government's support for playgroups and childminders – opposed to more 'professional' nursery education and day nurseries – were identified as the way forward for the care and education of young children. In 1976, a Department of Education and Science's paper on nursery education declared that daycare provision 'will have to be cheap in capital costs and trained manpower', and the conference, 'Low-Cost Day Provision for Under-Fives' held the same year confirmed Government's commitment to address the 'attainable', not the 'desirable' (in Lewis, 2013b, p. 265). This supported the Preschool Playgroup movement's approach that relied on the voluntary sector, which expanded through the 1970s to meet the needs of, mostly, middle-class families. The Director of

the National Children's Bureau, Mia Pringle, opposed women going out to work and viewed playgroups as complementary to the male breadwinner model. Part-time provision constrained women's labour market participation by the logistics of working around the short hours of care. She contrasted this ideal with the alternatives: supplementary provision (nursery school), which was also acceptable; and compensatory/substitute family care (childminders, day nurseries), which should only be available to families with special needs (Lewis, 2013b, p. 267). Through the 1970s, local day nurseries therefore became places of "last resort for dysfunctional families" (Penn, 2009c, p. 118). In essence, while it was acknowledged that some women would continue to choose to work, the Government's approach was to consider how to monitor private arrangements – such as day nurseries and childminders – rather than increase their involvement in the expansion of public services.

It was not until 1980 that a more united campaign for an integrated approach to education *and* care emerged. The National Childcare Campaign's discussion paper *Childcare for All*, with financial support from the Equal Opportunities Commission, made a case for the development of community run nurseries delivered by trained staff, but maintained there should be parental involvement (Penn, 2009c, p. 119). There were disagreements about whether services should be publicly provided, or provided through a mixed economy in the form of community-based private providers. However, interestingly, both sides were "uncomfortable about private childminders, which, they rightly recognised, tended to exploit working-class women" (Randall, 2002, p. 231). A feminist inspired child care lobby grew in strength over the decade and there was increasing consensus that child care was an issue for working mothers. This was in contrast to previous divisions between children's educational needs and the needs of socially disadvantaged families (Randall, 1996, p. 180).

Reforms through the 1980s increased the regulatory responsibility of local authorities in child care provision; however financial expenditure and autonomy in funding decisions was limited. Due in part to the lack of publicly provided or funded services there was a three-fold expansion in the number private day nurseries through the 1980s (Randall, 2002, p. 228). Most of the expansion of public provision was in the provision of part-time places (Randall, 1995, p. 336). It is interesting to consider these trends in relation

to broader child care patterns. It was reported that in the late 1980s over two-thirds of working mothers relied on relatives for their child care arrangements. In 1986 it was estimated that childminders cared for approximately 70 per cent of children who attended some form of full day care and, after informal care by relatives, childminding was the second largest category of care used by children below school age. Owen also points out that there were likely large numbers of unregistered childminders who do not appear in official statistics (Owen, 1988). Furthermore, the mid-1980s is recognised as a time when there was a resurgence in the use of nannies and *au pair*s. The increased demand for private nannies is attributed to the increase in mothers' employment, combined with the lack of public responsibility for daycare and a dominant ideology that mothers – or a substitute – are the best form of care for young children (Gregson & Lowe, 1994).

The Children Act 1989 recognised that full-time care was a necessity for many families; however the Government maintained that it was still a private responsibility and continued to resist demands for greater public involvement (Lewis, 2013a). Initiatives through the late 1980s (and 1990s), therefore, encouraged further private sector involvement, including from employers (Randall, 2002, pp. 228-229). In 1990 the Equal Opportunities Commission published a report, *The Key to Real Choice*, which attracted the interest of employers, as well as by organisations such as the Daycare Trust and Workplace Nurseries Campaign (Randall, 1996, p. 182). The Ministerial Group on Women's Issues encouraged employers to provide childcare and encouraged tax relief for employers to do so. The report also encouraged employers to "guarantee their quality" (Randall, 1996, p. 183), which is discussed further in the next section. Women's interest groups, too, began to draw on the market rhetoric of the Conservative Government to promote an employment focused agenda for the expansion of child care provision. By the late 1980s even the position of the National Childcare Campaign had evolved to "accept the case for workplace nurseries" (Randall, 2002, p. 231). The Conservative campaign for Tax Relief for Child Care was set up in June 1990 to secure tax relief on all forms of registered childcare. The Working Mothers' Association was a key supporter in this campaign (Randall, 1996, p. 183).

Pressure groups advocating for more formal and regulated provision shifted their demands from public provision toward acceptance of public assistance to foster the demand-side of the market. For example, the pressure group *Employers for Childcare*, formed in 1993, believed aligning with the Government's proposed demand-side approaches would achieve more for working mothers than fighting against them (Randall, 1995, p. 328). In 1994 the Government announced the introduction of a demand-driven voucher system for 4-year olds to facilitate parents' choice to use playgroups, childminders and day nurseries. The scheme was criticised by the state and private nursery groups alike as well as the Pre-School Playgroup Association. Many groups were hesitant because of concerns that the voucher scheme would impede their own interests (Lewis, 2003; Randall, 1996), including the NCMA who fought for inclusion in the Nursery Voucher scheme through their 'Childminders are Educators' campaign (Professional Association for Childcare and Early Years, 2013).

Reforms under Labour signalled a shift toward greater acceptance of child care for under-3s for employment purposes, and New Labour's Sure Start program established a non-stigmatised approach to care for children in poor areas. However, it should be noted these were targeted as parenting programs, and did not provide a universal approach to care for all children. Targets set by the European Union in the late-1990s to increase female employment and children's participation in ECEC also drove the development of demand-side funding to facilitate women's workforce participation (Lewis, 2009, p. 13). Until the late 1990s, "there was quite a clear distinction between group provision and childminders" (Government representative, UK-10). These distinctions are still reflected in the separate policy design for free early education and child care for working parents. A number of UK scholars emphasise the embedded distinctions between nursery education, day nurseries, childminders and playgroups – particularly the embedded class divisions (Cameron, 2002; Lewis, 2013b; Penn, 2009c; Randall, 2002). Helen Penn notes the class divisions in nursery education between middle-class and poor families, and similar class divides for families' *care* arrangements: nannies were the ideal for upper-class families, while day nurseries were the "only solution" for poor families requiring care for young children (Penn, 2009c, p. 111).

The actors behind each of these types of care experienced moments of success and setback, which were largely shaped by economic, political and ideological opportunities and constraints. The central government was able to justify their lack of involvement by suggesting that local governments were better suited to meet the needs of the communities (Randall, 1995, 2002). Inconsistent organisation at the local level also contributed to the mixed success in rendering more public support for the provision of different forms of centre- versus home- based, full-time versus part-time and public versus private ECEC provision.

Canada

The timing of key achievements and optimistic moments in Canada mirrored many of the equivalent developments in Australia. Similar events and organisations indicate the strength of advocacy groups' demands' for a national day care program. This includes the promising recommendations put forward by the Royal Commission on the Status of Women in 1970 and the establishment of the Child Care Advocacy Association of Canada in 1982. However, key actors and efforts to achieve their stated objectives for universal, centre-based ECEC were constrained by competing interests and ideologies. In many ways, the child care movement responded to the lack of attention and ambivalence of the women's liberation movement toward child care (Timpson, 2001). Also, while all three countries are characterised by multi-level governance, they have different levels of centralised control. However, the history of the division of responsibilities for child care across the federal, provincial and municipal governments is arguably the most complex in Canada (Mahon, 2006b).

As introduced in earlier chapters, the focus for Canadian analysis is the province of Ontario: it is the most populated province; its child care advocacy groups have been historically influential in shaping federal movements (Mahon, 2013), and it is the province with the most number of Live-In Caregivers (Human Resources and Skills Development Canada, 2013). However, this chapter and later chapters give equal attention to the federal policy context. In many ways, advocacy efforts at the provincial level are a response to the limited achievements made at the federal level (see Tyyska, 2001). ECEC policy in Ontario (and the City of Toronto) informed broader federal movements through the 1970s and 1980s, and advocacy at the provincial level was

central to the formation of coalitions between union groups, femocrats and child care advocacy groups (Friendly, 2000; Mahon, 2000; Prentice, 2001; Timpson, 2001).

The 1970 Royal Commission on the Status of Women recognised that "all women needed access to child care if they were to enjoy equal opportunity with men" (Mahon, 2007, p. 58). The commission's recommendations were underpinned by principles of gender equality that reflected second wave feminism. It stated that the "aim is neither to require women to enter the labour market nor to compel them to stay home with their children", but that the government had a role to play in providing child care to "all those who need and want to use them" (Mahon, 2000). The Commission's recommendations to develop a national day care program did not materialise. Instead the Child Care Expense Deduction was established in 1972. Subsequent pressures from femocrats within the federal bureaucracy and by the National Action Committee for the Status of Women led to the first national conference on day care in 1971; but still the recommendations following the conference maintained the status-quo of federal-provincial cost sharing arrangements established under the Canadian Assistance Plan in 1966 (Mahon, 2007, p. 58). The committee appointed to assess the Commission's report expressed opposition to the Commission's recommendations, with the chair of the committee in charge of child care noting

> we do not feel that child care should be explored further within the realm of the status of women because this would focus on freeing women for work rather than on support for the family as a unit (Mahon, 2000; Timpson, 2001, p. 67).

This ambivalence about the expansion of public child care by the women's movement influenced the establishment of an autonomous care movement, particularly at the provincial level (Timpson, 2001, pp. 68, 88).

Efforts at the provincial and municipal level therefore responded to the limited involvement at the federal and provincial levels. At the provincial level the Ontario Day Nursery Act (DNA), established in 1946, clearly stated that day nurseries were a "welfare" service for the poor. This meant that the care and education of all other children was left to the private sector, with minimum standards monitored through the DNA and municipalities. The 1974 White Paper on Day Care Services to Children (Birch White Paper) was released by the Provincial Secretary for Social Development.

97

It rejected the idea of free, universal child care, instead supporting private care and involvement of the commercial sector. The provincial Day Care Reform Action Alliance (who favoured the 'welfare' approach), together with the more radical Toronto-based Day Care Organising Committee, campaigned on common ground against Birch's proposal for affordable, low cost (and low quality) care (Mahon, 2007, p. 63). Their advocacy efforts were successful in preventing the Ontario Government from implementing the recommendations from the Birch report.

While the City of Toronto offers only one lens of analysis, the issues raised at the end of the 1970s and early 1980s were relevant to the wider child care debate, particularly the way public and private responsibilities were addressed. Child care advocacy in the City of Toronto achieved relative success in the mid-1970s with the expansion of regulated spaces, and a commitment to high quality services (Friendly, 2000; Friendly & Prentice, 2009; Prentice, 2001). However, economic and political factors imposed barriers to extending the City's momentum to the provincial and federal level. The high cost of licensed services in Toronto was identified as a reason for the high numbers of families relying on care by relatives and other informal arrangements. While the use of informal care was prevalent in all three countries at this time, the next section points out the relatively higher use of in-home child care in Canada. The City of Toronto and the province of Ontario responded by establishing a register of informal carers and providing material to promote "informed parental choice" (Mahon, 2007, p65), instead of increasing funding for licensed providers.

The 1980s was a busy decade for child care in Ontario and Canada. In 1982, the Ontario Coalition for Better Day Care (OCBDC[18]) was formed through an alliance of the more radical group Action Day Care and other feminists that were part of the labour

---

[18] OCBDC was formed in 1982 through an alliance at the provincial level between Action Day Care and feminists within the Ontario labour movement. Action Day Care was formed in 1979 out of the Day Care Reform Alliance. Action Day Care organisation demanded free universal child care, and was represented a range of interests groups, including the labour movement, feminist groups and the National Democratic Party.

movement in the province. The OCBDC played a major role in the formation of the Canadian Daycare Advocacy Association, (CDAA[19]), which was established at the national conference in 1982 (Mahon & Collier, 2010). Under the Liberal Government (from 1980 – 1984) the 1984 Abella Commission on Employment Equity and the Cooke Task Force on Childcare brought child care to the spotlight in federal politics. Many submissions to the Abella Commission called for employer and government support for child care, however calls for public universal child care were not central to the submissions (Timpson, 2001, p. 109).

The Cooke Task Force report, released in 1986, expressed the urgency of the need for more affordable and regulated child care options to meet the needs of working mothers, evidenced by the high number of families dependent on informal arrangements.

However, before the Cooke Task Force report was released the Conservative Government came to power (1984) and established their own Special Parliamentary Committee on Child Care (SPCC) to examine the appropriate role of the federal government in child care. Their recommendations, published in their report *Sharing the Responsibility*, shifted attention away from the Cooke Task Force and Abella Commission's findings and recommendations (Timpson, 2001, p. 141). Soon after in 1987 the National Strategy on Child Care was announced, which proposed tax credits for home care or private care arrangements for children, with low amounts of compensation, which would serve to encourage women's traditional homemaking activities (Timpson, 2001, p. 129; Tyyskä, 1995, p. 141). The Strategy on Child Care was

> in line with a Conservative family ideology, the proposed tax credits for home care or private care arrangements for children, with low amounts of compensation, would serve to encourage women's traditional homemaking activities (Tyyskä, 1995, p. 141).

---

[19] Since renamed the Child Care Advocacy Association of Canada (CCAAC)

The Strategy was opposed by child care advocacy groups, namely the CDAA and OCBCC, who worked together to oppose the Conservative agenda. With little compromise from either side, Bill C-144 was not enacted. Linda White argues that the Canadian Daycare Advocacy Association (now CCAAC) non-negotiable commitment to universal child care left no room for compromise with the Conservative Government's proposed National Strategy for Child Care. She suggests that even a "watered-down" program, which would have included support for commercial providers, would have institutionalised the legitimacy of child care in its own right, rather than one of many children's services. Instead, she argues, the *absence* of a child care program has been institutionalised (White, 2001, p. 111). The Conservative's policy reforms were supported by the emerging group, R.E.A.L. (Realistic, Equal, Active, for Life) Women, who opposed the liberal women's movement demands for child care. R.E.A.L. argued that regulation hampers private day care arrangements, and was a staunch supporter of tax credits and exemptions in support of private, maternal care (Tyyskä, 1995, pp. 142-146).

Attitudes towards the National Child Care Strategy (which was never implemented) did not simply reflect a division between the left and right political parties. There were also differences in opinion within the left-liberal block. Many women Liberal supporters also supported the idea of tax credits and an employers' capital cost write-off for workplace day care, under the belief that it would provide more choice (Tyyskä, 1995, p. 152). Teghtsoonian also identifies "two strands of neo-conservative ideology" in Canada in the 1980s and 1990s – one that supported women in the home, and the other (more neo-liberal) that supported their participation in the workforce to limit dependence on social assistance (Teghtsoonian, 1995, p. 418). Both strands supported, albeit with different intentions, the use of tax measures to support private forms of care for young children (Harder, 2004). And, both strands opposed the feminist vision proposed in 1970 Commission on the Status of Women and the 1986 Liberal Task Force on Child Care, which supported the expansion of publicly funded and regulated out-of-home care. As one interviewee commented on conservative ideology in the 1980s and 1990s, there was a belief that "if you had children you should pay for them and it's not a public responsibility… [it's] a private affair between a parent [and a

business]…it's a service that they purchase the same way they buy a car" (Provider organisation, Canada-06).

At the provincial level, the mid- to late-1990s was a period of unravelling of progress for advocates such as the OCBCC. Following severe austerity cuts between 1990 and 1995 under the Liberals the introduction of the Canadian Health and Social Transfer (CHST) replaced the Canadian Assistance Plan (CAP) in 1995. This meant there was no funding designated for child care – provinces now had discretion over where the money went. Exacerbating this problem in Ontario, the Conservative Government released the report (by then Minister of Community and Social Services, Janet Ecker), *Improving Ontario's Child Care System*. This report recommended "reduced access to government-regulated and funded child care", and that child care should include "as many different kinds of quality care as possible". The report's recommendations were arguably influenced by the Association of Day Care Operators of Ontario, who represented private for-profit operators who supported "parental choice" (Tyyska, 2001, p. 139).

In 1997 the province gave more responsibility to the municipalities, who could opt to subsidise informal care. The OCBCC described this announcement as the "birth of the voucher system and the collapse of regulated child care" (in Tyyska, 2001, p. 140). These policy defeats for advocates for universal child care, such as the OCBCC, were reaffirmed with the OntarioWorks program in 1998. The program aimed to get welfare recipients into work and the provincial-municipal agreement allowed the cost of unregulated and informal arrangements to be covered – this was a change from the previous agreement that was limited to regulated services (Tyyska, 2001, p. 141). The OntarioWorks program was implemented to facilitate mothers' participation in the workforce as a means to address child poverty. However, a contentious point in the policy was that there was no right to quality care for the mothers and children. Instead the informal sector was promoted as the natural solution to mothers' work-related care needs (Mahon, 2007, p. 72).

In the lead up to the 1993 federal election the Liberal party promised to expand regulated child care dramatically and called for a "more dedicated funding approach"

(in Friendly, 2000, p. 15). However, the 1995 budget revealed a very different approach to that promised in the Red Book or Social Security Review report. The budget announced the switch from CAP to Canada Health and Social Transfer (CHST) block grants. This new funding approach not only cut overall funds, it also lumped child care together with health, social welfare and secondary education with no provision for guaranteeing funds were used for child care specifically.

The need for children's services was addressed through the National Children's Agenda (1999), which subsumed child care as one of multiple strategies to improve child wellbeing and eliminate child poverty. Funding and programs under this strategy were therefore targeted to the neediest. Mothers' work related need for child care was viewed very separately and universal centre-based provision was not accepted at the federal or provincial levels as a solution to addressing demands for work-related gender equality. Therefore, alternative solutions – including the Live-In Caregiver Program – were promoted by government. Children's needs, on the other hand, were addressed through targeted programs and subsidies for low-income families. In addition to ideological preferences for private (including commercial) providers, fiscal pressures and austerity measures resulted in even greater disappointment for the federal and provincial advocacy bodies. As will be discussed further in Chapter 6, the National Children's Agenda represented a broader neo-liberal shift which subsumes child care "under services for early childhood development" where "the notion of child care as a support for gender equality (or for employability) disappears" (Mahon & Phillips, 2002, p. 208). In efforts to broaden support many advocacy groups accepted this new discourse, despite the fact that it ignores the need for high quality services for all children, and does not address gender equality in the home and the workplace.

Home-based care and nannies: ignored or promoted?
The previous sections outlined key advocacy groups and policy developments related to the child care movements in each country. Evidently, demands for different forms of child care differed in each country. However, in all three countries there were pressures to expand options for regulated, centre-based child care at no or low-cost to parents. Despite some promising moments, we know that national child care programs did not materialise to meet the full demands of these advocacy groups – or the needs of many

families. This section explores in more detail how specific policy proposals and reforms, and the actors supporting them, promoted care in the child's home. This discussion is extended to home-based care arrangements where it's especially relevant to the emergence of in-home child care, as in Australia.

Australia: In Home Care in the shadow of FDC

While non-parental in-home child care, such as nannies, was not explicitly promoted in the Child Care Act 1972, parental care was the preference and 'family-like' care was the next best alternative. In Parliamentary debates, Senator Margaret Guilfoyle stated she hoped that centre based care would not be used for children less than 3 or 4 years, unless parents were single or ill (Brennan & O'Donnell, 1986, p. 24). Through the 1970s and 1980s family day care was promoted because it was believed home-based care provided a family-like environment for children and also aligned with ideas about the division of labour and the role of women as caregivers, rather than workers. Similar to the UK and Canada, discussed later, family day care was used mostly by families where work was a necessity for the second, or sole, earner, and children required a safe environment while the mother worked.

Family day care originated as a pilot scheme by the Brotherhood of St Laurence in Melbourne in the early 1970s and evaluations of the program recommended it be considered as an alternative and complement to centre-based case, rather than a solution to meeting the child care needs of working mothers (Brennan, 1998, pp. 132-133). The 'mother-substitute' ideal of family day care – established formally following *Project Care* in 1974, shaped the informality and flexibility that family day Care offered. As mentioned above, *Project Care* responded to Joan Fry's contested 1973 report. *Project Care* discussed two alternative approaches to family day care: one resting on the mother ideal that 'incorporates an extra child or children into her household' and, the second, viewed caregiving as an occupation, whereby remuneration should be 'commensurate with out-of-home employment'. The commission advocated that the former approach "would be more in keeping with the spirit of family day care for the caregivers to be regarded as housewives carrying additional duties, rather than as workers" (in Brennan, 1998, p. 134).

Families used FDC for non-standard hours, including evenings, weekends and overnight. Studies in the mid-1980s, arguably at the height of family day care, found that FDC was used predominantly by children where both parents were in the workforce (compared with approximately half for children in centre-based care), and FDC was also more likely to be used by children with special needs, care of infants, and for the provision of care in remote and sparsely populated areas (Kingdon, 1984, quoted in Jones, 1987, p. 94). The groups of children identified as being more likely to use FDC in the 1980s are the same groups of children and families for whom the In Home Care program was developed for 15 years later.

By the end of the 1980s there was much greater acceptance of women in the labour market and work outside the home appealed to women who, two decades earlier, might have accepted the low remuneration as extensions to domestic duties that defined family day care (Jones, 1987). With increasing regulation for family day carers, there were also increasing demands to be paid fairly – or at least at the same levels as staff performing equivalent jobs in centre-based settings.

Pressures from the Government, providers and families all shaped the formalisation of the family day care sector. The Commonwealth Government needed to hold publicly funded services accountable; care workers realised that in order to improve their occupational status they needed to conform to prescribed standards to improve the public perception that family day care schemes were of high quality; and families' expectations and decisions took account of the quality, reliability and accountability of providers. These pressures prompted some 'family day care mothers' to change their description of themselves to 'home-based child care workers'. This name change was

the first step to attain award wages[20] and working conditions (Jones, 1987, p. 98). As Jones writes in 1987,

> the original model of informal, motherlike care is gradually ceding ground to the idea that family day care should be a formal, quality service akin to that provided in child care centres (Jones, 1987, p. 96)

Jones' conclusions are consistent with current concerns about the family day care sector. As one key informant interviewed for this thesis said, "with regulation requirements…overtime…FDC has lost what they're all about…when you're trying to professionalise a group you've got to make sure you don't lose some of the really good things" (Peak organisation, Australia-15). Furthermore, Jones' concluding remarks (written in 1987) about the potential transformation of family day care foreshadows the issues and debates that are central to the issues of in-home child care and nannies today. More specifically, he acknowledges the "inherent tensions" and transformations "are highly likely, perhaps inevitable, when informal relationships and exchanges are brought into the public sphere" (Jones, 1987, p. 103). Petrie's comments reiterate this tension, where she suggests:

> [o]n the one hand, family day care is promoted by governments. On the other hand, there appears to be very little economic value placed upon it. There is a further contradiction. Family day care is a service provided to facilitate the movement of women out of the home and into the workforce, and yet it is a service which relies on women remaining in the home (Petrie, 1991).

Overall these low-paid care workers were viewed as an affordable form of child care to facilitate increasing women's employment, and the government supported FDC as the cheaper alternative to centre-based care. However, in contrast to Canada (discussed later), home-based care in the form of FDC was supported by government as the

---

[20] 'Award wages' is a term used in Australia to refer to the "minimum wages and conditions an employee is entitled to". These are set out as 'awards' depending on the industry and work performed (Fair Work Ombudsman, 2014)

cheaper and more appropriate form of care – not as a form of private care removed from government involvement. As explained in an interview conducted in 2012 as part of the research for this thesis, a representative from a peak organisation with over three decades of experience in the sector explained that in the 1970s and 1980s there was

> lots of debate…about expansion of family day care, and in those days…there were community organisations who actually decided … whether a family day care [scheme] could operate…state and commonwealth governments would work in partnership…and they had to go into areas of identified need (Peak organisation, Australia-15).

There is limited information about the hiring of nannies in Australia, however interviews with stakeholder organisations suggest that the 'British tradition' was upheld through the 1970s and 1980s, where Australia's upper-class families seeking nannies were recruited from British training organisations (Nanny agency, Australia-09). Pressures for government supported in-home child care evolved from mobile services established in the 1970s designed to meet the needs of families living in rural and remote parts of Australia. These services – many of which still exist today as part of the Remote and Isolated Children's Exercise – had a holistic approach to children's health, welfare and development, which combined the needs of children (care and development) with the needs of families needing extra help, particularly during seasons requiring intensive work on the farm (Provider organisation, Australia-11).

An examination of the development of family day care reveals strong connections to the birth of, what is now, In Home Care. At the same time, the history of ECEC in Australia reveals no 'natural moments' that legitimised informal in-home child care. Australia stands out among the three countries for its limited financial support for families who use informal in-home child care. The restructuring of the children's services sector in 1980s and 1990s shifted the place of family day care and created a gap in the market for more flexible child care provision. Writing in 1987, Jones indicates how FDC providers started demanding remuneration more in keeping with that of other women working outside the home. At the same time, the government imposed new monitoring and reporting requirements that affected the number and patterns of hours of care provided by individual FDC providers. These changes reshaped understandings about the

importance of caregiver training and quality care and, in turn, impacted upon parents' demands for more regulated services. The restructuring of FDC thereby created a gap in flexible, affordable care for families. Arguably in response to mounting pressures for more flexible care through the 1990s the In Home Care program was introduced to meet this 'gap' in the FDC sector. It started as the Sick Care Pilot, to fill a gap in the need for home-based special needs care that had faded away through a series of reforms that 'formalised' the FDC sector. By the end of the 1990s, pressures for flexible provision to address special needs and non-standard work patterns strengthened and continue today under increasing demand for affordable and flexible options to meet the needs of working families. Detail about the development and implementation of In Home Care is discussed in Chapter 6.

Additional pressures for the subsidisation of work-related in-home child care, namely nannies, remain on the policy agenda and the 'nanny issue' (in-home child care) has received increased policy attention since the Liberal-National Coalition Government took power in September 2013. However, the pressures today for flexible and affordable solutions to child care are in stark contrast to that of the 1970s when subsidisation of family day care was supported under the rationale that some mothers needed to work and *appropriate* care should be provided to their children. Today, in-home child care receives attention as a way to encourage women's workforce participation. As one interviewee explained, while in-home child care, or nannies, used to be for the

> rich and famous…over time with increased female participation in the workforce, as the need for more flexible care, and the rise in the cost of LDC and other options it [in-home child care] has become a more affordable option…But there are a lot of issues around lack of supervision of their employment and people being exploited and not being insured… (Nanny organisation, Australia-20).

As will be discussed in the experiences of the UK and Canada in later chapters, national and global pressures also expose new forms of gender, class and racial inequalities in relation to in-home child care. These inequalities differ in relation to the gender inequalities debated in regard to family day care in the 1970s and 1980s, and also in relation to forms of traditional in-home child care, such as nannies.

United Kingdom: The nanny ideal – still private and unequal?

The increased demand for nannies (and *au pair*s) during the 1980s was driven by both increases in mothers' workforce participation and the limited public responsibility for centre-based care. However, as mentioned earlier in this chapter, demand and supply were also driven by a dominant ideology of mothering, as well as the long-standing tradition of nannies for Britain's well-off families (Gathorne-Hardy, 1972). Gregson and Lowe attribute demand for nannies to preference for 'mother substitutes'. They also attribute the availability, or supply of nannies, to the dominant ideology of young women at the time who viewed nannying as a natural career path before they started their own families (Gregson & Lowe, 1994). As later chapters explore in detail, demand for more affordable in-home child care, namely *au pair*s, was met with an influx of migration from Eastern Europe in the late 1990s and 2000s. Demand for *au pair*s arguably stems from embedded norms and structures about private responsibility, however nannies and in-home child care were positioned very differently in ECEC policy until the 2000s (Cox, 2012).

The socioeconomic status, or class, of families and child care providers is central to our understanding of both funding and regulation for different forms of care in the UK. The relative absence of debate about nannies and in-home child care in ECEC policy until the 1990s is often attributed to class-based understandings of different types of child care. As one key informant asserted, nannies are "very traditional, and the government has left well alone in terms of interfering in the child care decisions of the richest people" (Key informant, UK-04). It is widely accepted in ECEC research that childminding in the UK developed as a service provided by a lower-class women and, to a lesser extent, was used by a similar class of families (Owen, 2003; Penn, 2009c). Nannies, on the other hand, continued to be viewed as being only for the rich, although they were increasingly used by middle-class working families and nannies themselves were more likely of a similar class (Gregson & Lowe, 1994; Vincent & Ball, 2006). Therefore while there was a common home-based (and private) element to care provided by childminders and nannies, they were treated very differently in policy debates and regulatory reforms.

In the UK in the 1980s, many young women seeking employment as nannies had completed the National Nursery Education Board (NNEB) certificate. The NNEB was viewed as a passport to work in nurseries, however a 1986 survey reported that most graduates planned to pursue nannying (Owen, 2003). So, despite the relatively formal qualification and pathway for young women, it received little attention in the broader ECEC sector at the time. In the early 1980s a new association, the Professional Association of Nursery Nurses (PANN), was established to cater to nannies (Nanny association, UK-13), however nannies still remained outside any formal ECEC policy structure during this time. Further examination of the role of PANN, and now the union, Voice, is discussed in Chapter 8.

In the lead up to the Children Act 1989 there were a number of pressure groups and committees that made recommendations for the increased regulation of private providers. For example, the Ministerial Group on Women's Issues announced a five-point plan in 1989, which included amendments to the Children's Bill improving childcare registration. The plan also encouraged "employers and providers of childcare to adopt an accreditation scheme that would provide information about childcare facilities and guarantee their quality" (Randall, 1996, p. 183). However, nannies were largely excluded from any discussion about the spectrum of arrangements that should be monitored for quality. One exception was the 1987 White Paper, which included a clause to bring nanny share arrangements under childminder regulation. This was supported by the National Childminding Association (NCMA[21]) (established in 1977), which pushed for increased centralisation and regulation of childminder networks through the late 1980s. The NCMA fought for greater regulation and staff training through the 1980s and 1990s, and sought greater recognition of the sector by focusing on employer interests and workplace sponsored child care (Owen, 2003). Despite their

---

[21] The NCMA changed its name to the Professional Association for Childcare and Early Years (PACEY) in 2013. NCMA is used throughout the chapters because the name change occurred after fieldwork and most analysis was conducted.

efforts to extend this regulation to nannies, it was not incorporated into the 1988 Children Bill, and subsequent Children Act 1989 (Owen, 1988). Apart from this support for nanny share arrangements to be included under the childminding regulation, nanny care remained quite separate from other forms of ECEC provision.

What, then, was the Governments' responsibility for care provided in children's own homes? Since the 1980s, nanny organisations have pushed for the registration and regulation of nannies. One long-time advocate and supporter for the professionalisation and protection of nannies stated that,

> in the early 80s, nannies weren't registered, regulated. Anyone could call themselves a nanny. Nanny agencies weren't registered and regulated. Here we are in 2012 and the position's the same (Nanny association, UK-13)

The issue of nanny registration and regulation did not receive attention on the policy agenda until the late 1990s following the implementation of the Childcare Strategy. In 1999, following the rapid expansion of ECEC initiatives and funding in 1997, the childcare element of the Working Tax Credit allowed working families on low-incomes using formal child care services – namely nurseries and childminders – to claim up to 70 per cent of their childcare costs. However, this initial introduction of the child care element of the Working Tax Credit did not extend to families using nannies. The first introduction of government support for in-home child care was through a pilot program in 2004 and in 2005, when the childcare element of the Working Tax Credit was extended to registered informal carers, including nannies and *au pair*s through the Home Childcare Register. The debates and development surrounding this policy are detailed in Chapter 6. Overall, the Register was designed as 'light touch' regulation to provide options for working parents. When the scheme was implemented the NCMA also opened up membership to nannies to provide similar supports and training that are available for childminders (Professional Association for Childcare and Early Years, 2013). The generosity, level of means-testing and regulation for in-home child care continue to be debated today (Morton, 2012, 2014). The issues of funding and regulation and the intersection with migration policy and the hiring of *au pair*s are examined in later chapters to analyse how the origins of the traditional nanny in the UK have shifted in recent years.

Canada: Embedded spheres of nannies and ECEC

As in Australia and the UK, non-parental child care in Canada was limited in the decades following the closure of wartime nurseries. Most mothers with young children remained at home with their children, or found alternative private arrangements (Bird, 1970, p. 264). And, also similar to the other two countries, nannies and in-home child care were only a reality for the wealthy. Interestingly, and in contrast to Australia and the UK, the first major report calling for greater public involvement in child care (other than as a purely welfare measure), proposed the inclusion of care provided in the child's home in the mix of care options. As Schlesinger (1971) states in his summary of the recommendations from the Report on the Status of Women (1970), the "commission envisioned day care as encompassing domestic workers and visiting homemakers as well as nurseries for full time, short term, and emergency care" (Schlesinger, 1971, p. 254). This provision acknowledged that some women may need day care facilities at home because of parental or child illness or disability. As mentioned above, the Commission's recommendations were not implemented, and opponents of the recommendations succeeded in making a case for lower cost, private care. However, this detail illustrates that in-home child care was regarded as a valid form of care for public subsidisation from the early 1970s. And while there was no national child care program that supported in-home child care, the introduction of the 1971 Child Care Expense Deduction as part of the Income Tax Act laid the foundation for government's financial and ideological support for informal and private arrangements.

A decade later, in 1981, the establishment of the Foreign Domestic Movement (now the Live-In Caregiver Program) reaffirmed Government's belief that unregulated care in the child's home was an appropriate form of care for young children or – at very least – was the most affordable way to support the increasing employment of mothers. As Daenzer contends, "economic interests have been, and continue to be, the primary considerations that guided the opening up of the program to non-British and to non-white women." (Daenzer, 1997, p. 104). The Live-In Caregiver Program (LCP) is a scheme that allows families (employers) to hire migrant caregivers (employees) to live in the family home to care for children or an elderly family member. Details of the current LCP are discussed in Chapter 5.

Despite some optimism in the mid-1980s following the Katie Cook Task Force, the Conservative Government's report, Sharing the Responsibility (1987), reiterated that the belief that

> [T]he primary responsibility for child care must rest with the family … [and]…the community and wider society have important roles to play in assisting parents and providing supplementary forms of child care (Martin, 1987, p. 10).

The recommendations acknowledged a role for Government to improve the quality of informal arrangements, such as unregulated day care homes; however debate focused on the tax system to subsidise the (limited) options available and were justified in the name of parental choice. The Report's recommendations were echoed in the National Strategy on Child Care announced in 1987. As mentioned earlier, after Bill-144 died in 1988, the Conservative Government indicated it would re-introduce child care legislation if it returned to office. However, the then Minister of Health and Welfare was quick to assert the federal Government's priorities, indicating that Canadian tax dollars shouldn't "pay for the yuppie couple", but rather support families in economic need. The Minister added that child care "is not simply a program designed to increase career opportunities" (In Teghtsoonian, 1995, p. 423). Because these policy mechanisms were not officially part of a 'child care program', the federal Government turned a blind-eye to the regressive (CCED) and exploitive (LCP) measures inherent in the mechanisms facilitating (middle-class) women's workforce participation. At the same time, many Conservative MPs believed that women should be encouraged to stay at home and look after the family.

Similar to the UK, divisions between regulated home-based child care (Licensed Home-based Child Care in Ontario and unregulated private home child care), and in-home child care (nannies) are class based. One key informant stated that the "home-based model is very, very divided. It's obviously gendered, it's been classed, socially classed since long before its inception…it's become very racialised" (Key informant, Canada-17). This informant argues that since the 1980s low-income (often immigrant) women have been encouraged to become licensed home-based child care providers to care for children from a similar class of families who 'needed care'. This was viewed by the Ontario Government as a means to reduce their dependence on social assistance. In

contrast, middle-class families' needs remained a private responsibility – to be met by the family, private centre-based care, unregulated home care and, increasingly, in-home child care under the (now) Live-In Caregiver program.

Many interviewees confirmed the embedded philosophy that the care of children is still a private responsibility: "yes, it's [child care] changed. But there's also a lot that has not changed. There's still a long way to go before childcare gets accepted…" (Provider organisation, Canada-06). While the workforce participation of Canadian mothers was increasingly accepted (and even encouraged) in the 1980s, there was limited financial assistance or services to reconcile their care responsibilities. Thus, while women in Canada were increasingly considered equals in the workforce, there were no policies in place to address work-family balance and gender inequality in the home (Harder, 2004). The Live-In Caregiver Program offered families a way to outsource their domestic responsibilities – child care and other tasks – to women with fewer employment opportunities outside the home. The contradictions that emerged in the late 1980s under the Conservatives signalled the new discourse of 'social investment' by the Liberal Government in the 1990s, which is detailed in Chapter 6.

Restructuring support for ECEC: a new direction?
In all three countries similar debates took place regarding the role of care versus education across the public and private, and formal and informal spheres. Dominant ideas about the care of young children being the responsibility of the family hindered the success of advocacy efforts, particularly by the feminist movement, for regulated, centre-based early childhood education and care. However, by looking at the details of the debates, pressures and actors through the lens of in-home child care, contrasting attitudes are revealed.

In Australia, competing interests for universal ECEC led to a greater role for the private sector in centre-based care and support for (lightly) regulated home-based care as part of family day care. In the 1970s, groups such as the Australian Pre-School Association (now Early Childhood Australia) and Community Child Care who supported different forms of non-profit, centre-based care provided by trained caregivers were challenged by new ideologies and financial pressures for targeted and 'cheaper' forms of home-based care. Lower employment rates among women and mothers (and high part-time

rate) also arguably contribute to the limited demand for more flexible child care options. The community preschool movement, particularly in Victoria and New South Wales, was more in line with the child-centred needs of these families. Instead, in-home child care originated in the late 1990s in response to the needs of families with illness or disability, and was naturally incorporated into family day care. As will be discussed in Chapter 6, this targeted approach to in-home child care is arguably being pushed aside as greater attention is being given to the economic benefits of mothers' workforce participation.

In the UK, demand for traditional 'nanny' care increased in response to the lack of public responsibility for formal ECEC; however such care remained largely outside the scope of debates regarding public and private care domains, until the late 1990s. Instead, advocacy movements were divided by demands for part-time education versus full-day care (mostly childminders) for mothers that needed to work, neither of which made a case for government support for care in the child's home. Demand for work-related child care in the 1980s shifted responsibility for care from the private family to private organisations and employers. Pressures and movements (including demands by feminist groups) were divided in their demands for government involvement in the provision of child care, and calls for universal care were weak. The care of young children remained a private matter until the mid-1990s, and therefore left in-home child care outside the scope of ECEC debate. However, women's groups and employer groups continue to advocate for greater government support for child care, and support for nannies and in-home child care receive greater attention in Early Years sector debate. As Chapter 7 discusses, recent debates about the subsidisation and regulation of nannies continue to reference class divisions and local care culture embedded in ECEC policy and practices.

In contrast to both Australia and the UK's experience, in Canada in-home child care was proposed as a valid form of formal and publicly supported care in the early 1970s, through the Child Care Expense Deduction. While advocates for in-home child care did not demand greater government support, private care in the child's home was ideologically favoured by conservative and neo-liberal governments. In the 1980s, the CCED continued to be supported by Government as a solution to meet demands for

child care in response to increasing female employment, while also providing parents a 'choice' about their child care arrangements (Harder, 2004). Commenting on working families' needs for regulated child care within a 'modern' economy, one interviewee affirms that "we [Canadians] still haven't evolved enough in terms of public policy and family policy to really enforce this" (Peak organisation-05, Canada). Later chapters discuss the embedded assumptions about work and care that maintain a division between public and private responsibility for ECEC in Canada.

Analysis of the origins of in-home child care in these three countries contribute to our understanding of care culture in liberal countries, including a more detailed explanation for why in-home child care (and ECEC policy more broadly) differ in these three countries. As discussed in the previous chapter, care culture can be explained by theories of institutionalism and welfare regimes. Care cultures shape, and are shaped by, attitudes and ideas about appropriate forms of care for young children. And, therefore, patterns of in-home child care use in the three countries can be explained in relation to policy developments and ideology, but, may also shape policy demands in line with dominant forms of care. Later chapters give greater attention to how policy structures and ideas reflect assumptions about care responsibilities that contribute to variant care cultures.

The next chapter takes a contemporary approach to analysis to compare the different ways that governments classify and promote different forms of ECEC, particularly in-home child care, through funding, regulation and migration. It illustrates how recent policy structures arguably reproduce many of the origins of in-home child care in each country. However, there are also examples of where government policy has sought to restructure patterns of ECEC use.

Chapter 5 : In-home child care – Cross-national policy analysis

Government involvement in the funding, delivery and regulation of ECEC affects families' early education and care options. Families' ECEC decisions are therefore shaped by individual and socially embedded preferences, but also by government policy mechanisms. As discussed in the previous chapter, in-home child care has developed alongside different ECEC policy legacies that reflect interactions between institutions, actors and ideas. This chapter complements and builds on the previous chapter by examining the policy details that shape in-home child care in the three study countries. It focuses on how nannies and other forms of in-home child care are situated within ECEC structures, but also considers broader policy influences, namely immigration policy and regulation. In doing so it illustrates where policy design is shaped by embedded policy structures; and it compares and critiques these policy mechanisms from an ECEC and broader social policy perspective. First, it outlines different terms and classifications for ECEC, followed by a comparative overview of ECEC trends. Next, each country's ECEC policy structure is introduced and, finally, the intersections of different policy mechanisms are examined. This discussion therefore provides a foundation for further analysis in Chapter 6 that analyses the ideas and rationales for these policies and Chapters 7 and 8, which examine the implications of these policies for families and care workers.

As introduced earlier, non-parental care for young children can take place in small- or large- groups settings, in both 'institutional' (centre) and 'domestic' (home) settings. Domestic settings can refer to the child's home or the caregiver's home. Furthermore, care in the child's home or caregiver's home can be provided by relatives or non-relatives and can be paid or unpaid. ECEC research tends to compare policy in relation to total government expenditure (as a proportion of GDP), expenditure per child, access and participation in formal, centre-based services, and division of responsibility between public and private sectors for funding and delivering formal services. However, little attention is given to how policy mechanisms and funding structures can also support the use of types of informal and unregulated care, including care in the child's home. Further, there is limited analyses of how regulatory requirements are (or are not) linked to financial support for different forms of ECEC. Looking specifically at in-home

child care, this chapter aims to address this gap in comparative research on ECEC policy. First, key trends and definitions are identified within and across countries. This provides context for discussion and analysis of policy details throughout the remainder of the chapter. As Table 1 (in the Introduction) showed, the terminology for types of ECEC is not consistent across the three countries. The complexities of the regulation and registration requirements flagged in the Introduction are revisited later in this chapter.

Limited data are available on the use of informal care – let alone in-home child care – particularly that is consistent and comparable over time. For example, England's Early Years and Childcare Survey includes nannies and *au pair*s under 'formal care', while the Australian Bureau of Statistics Child Care Survey includes 'non-relative care' under informal care and, in previous surveys, also included an 'other formal care' sub-category in formal care that included nannies. Data in Canada are very out dated (Bushnik, 2006) and contested (Cleveland et al., 2008) and therefore difficult to use over time or comparatively. International data sources, such as the OECD, provide some useful figures on the use of formal care, however share similar challenges in collecting comparative data on informal care for specific age groups over time. As discussed in the Introduction, informal, non-familial care is more prevalent in Canada than in the UK or Australia.

Across most Western countries, including Australia, the United Kingdom and Canada, the number of children using formal and informal care, and the amount of care they use, increased as more women join the labour force, and work longer and more irregular hours (Australian Bureau of Statistics, 2008; Cleveland et al., 2008; R. Smith et al., 2010). However, as mentioned, the proportion of children attending regulated services has not kept pace with mothers' employment, suggesting there is a gap between availability and demand for formal, regulated ECEC services (refer to Table 2 in Introduction for details). This is most apparent in the province of Ontario where, among children 0 to 3 years, 69 per cent of mothers are employed and only 24 per cent of children are enrolled in regulated centre- or home-based care (Human Resources and Skills Development Canada & Childcare Resource and Research Unit, 2012). While we

know that many children are cared for by grandparents or by parents working at home, we know little about alternative care options by non-relatives.

As mentioned in the Introduction, governments' classification of ECEC services affects trends in reported use by families, and therefore has implications for our understanding of the policy objectives and rationales behind governments' child care and ECEC approaches. A simple comparison of trends across countries does not reveal the changing and inconsistent ways governments and service users classify different types or domains of care. It is therefore essential that a comparison considers the scope and details of formal/informal and regulated/unregulated ECEC. Ultimately, these classifications shape our understanding of boundaries between public and private responsibility for child care and early education. In-home child care attracts public funds in all three study countries, whether through subsidies, vouchers, tax credits or deductions. However distinct differences exist with respect to whether the care is supported as informal/unregulated or formal/regulated forms of care. As this discussion and later analyses illustrates, the distinction is often blurred and it can be challenging to ascertain a definition for in-home child care that can be applied consistently across the three countries.

Government policy, including funding and regulations, has implications for how ECEC services are classified, and in-home child care holds a particularly precarious place. In-home child care can describe a *type* of ECEC (see Table 1), but can also refer to a broad term for describing the *setting* of the care, and therefore poses questions about the responsibility and purposes of care provided in the child's home. As discussed in Chapter 4, the distinction between 'care' and 'education' was strong in Australia, the UK and Canada following WWII, where 'education' was provided on a sessional basis in formal, group-based settings and usually delivered by a professional teacher. Conversely, 'care' was (and arguably continues to be) either formal or informal. Formal 'care' usually includes nurseries (now long day care or centre-based care) and family day care (or home based care), while informal 'care' refers to care provided by friends and relatives in or outside the family home. These traditional distinctions between formal and informal care often don't take account of policy shifts in ECEC, particularly the implications of funding and regulations on the level of perceived and actual

formality. For example, in Canada (Ontario), unregulated home-based care is subsidised through federal tax measures, even though the caregiver is not required to have any relevant qualifications. At the same time, a qualified nanny in the UK providing (unregulated) private care in the child's home is often classified as formal provision. Formality can therefore refer to the ECEC setting and regulation, but also whether the care provider is qualified.

Most countries across the Western world have increased investment in ECEC services as a percentage of GDP over the past decade, including the three study countries (see Table 3). As noted earlier, according to the OECD, Australia doubled investment from 0.3 to 0.6 per cent of GDP between 1998 and 2009; the UK almost doubled from 0.6 to 1.1 per cent; however Canada's investment as a proportion of GDP did not increase and remains the lowest at 0.2 per cent (Organisation for Economic Co-operation and Development, 2014). But, as Jenson and Sineau indicate, it is the "details of the services, the eligibility rules and forms of delivery" that matter (2001, p. 5). The remainder of this chapter focuses on these funding and regulatory details. The next section provides a country overview, followed by more detailed comparison of the intersection of policy in each country. The final section discusses some of the implications for children and families.

Country overview: ECEC policy

In-home child care holds a very different place in Australia, the UK and Canada's ECEC structure. As illustrated in Chapter 4, the origins and policy legacies of ECEC have been analysed and critiqued at the national level (Brennan & Oloman, 2009; Friendly & Rothman, 1995; Lewis, 2008; Mahon, 2009a; Penn, 2009c; Prentice, 2001; Randall, 1996) and in comparative welfare regime literatures on family and care policy (Baker, 2006; Brennan & Mahon, 2011; O'Connor et al., 1999). These literatures illuminate the dynamics of policy implementation, including explanations for why each country pursued similar and divergent policy approaches at different points in history. While scholars argue the complex interaction between the public and private sphere for ECEC, particularly in an era of increased reliance on market mechanisms, limited attention is given to the interaction of policy details and the implications for different types of care.

In Australia, the UK and Canada, policy reforms shifted the way in-home child care is placed within broader ECEC and social service systems. We know that young children have for over a century been cared for in different settings – group care in the form of kindergartens and day nurseries; care by family and friends in home settings, and non-parental care in the child's home. However, as discussed in Chapter 4, policy reforms impact the way *governments* support each of these forms of care. This remainder of this section provides an overview of key policy reforms and sector initiatives that shifted governments' support for in-home child care, followed by an outline of the current legislation that guides ECEC in each country.

Australia

Australia's Child Care Act, introduced in 1972, established the Commonwealth government's responsibility to regulate and fund centre-based care (now long day care). By 1975, the Commonwealth government formally incorporated family day care into its child care program (Jones, 1987, p. 90). Through the 1970s subsidies for centre-based child care (now LDC) were directed to centres and were based on the qualifications of the staff working in the centre. Tensions existed around the place of family day care because it was perceived as informal and based on a preference for the 'mother ideal' nature of care, rather than a service provided by qualified staff. Under the Liberal government (from 1975 to 1983), subsidies were increasingly targeted toward disadvantaged families, rather than directed to centres (Davis, 1983). As Chapter 4 discussed, increased pressures for state subsidised child care to meet the growing numbers of mothers entering the workforce led to the expansion of services in the mid-1980s, particularly in family day care. Shortly after, the Labor government also changed the funding mechanisms based on the number of spaces centres provided, rather than the number of qualified staff.

Reforms in the 1990s drastically shifted government's responsibility in planning and regulating child care services: the 1991 expansion of fee subsidies (and renamed Childcare Assistance) to private providers reflected a shift toward private responsibility for ECEC. By removing the government's role in planning the provision of not-for-profit services, private providers were able to establish services at their will, and users were able to receive subsidies for services with little accountability for the quality of

service provision. The removal of operational subsidies to not-for-profit services in 1996 also shifted responsibility further toward the private sector. Together, these reforms signalled clear preference for a market-based system that rested on demand-side funding mechanisms. Also, the Childcare Cash Rebate introduced in 1994 (following means-tested Childcare Assistance from 1991) subsidised up to 30 per cent of work-related child care for families, which included informal (but registered) care by relatives and non-relatives alike, but this measure was removed for informal care by the end of the 1990s. The Child Care Benefit replaced Child Care Assistance and the Childcare Cash Rebate in 2000 – at the same time that the In Home Care scheme was established (McIntosh & Phillips, 2002). The Child Care Rebate was introduced in 2004 to subsidise 30 per cent of out of pocket costs, and increased to 50 per cent in 2007.

Today, the Child Care Benefit provides means-tested assistance to families using approved services, which includes long day care (LDC), family day care (FDC), occasional care and In Home Care (and Outside school hours care for school-aged children). The Child Care Rebate is not means tested and covers 50 per cent of out-of-pocket costs up to $15,000 per year (see Table 11). The Australian In Home Care (IHC) program is unique compared with Canada and the UK, as it is a targeted and approved service, and also eligible for Child Care Benefit (CCB) and Child Care Rebate (CCR) at the same rate as approved long day care and family day care.

The *Education and Care Services National Law 2011* and accompanying *Regulations* provide the overarching framework for Australia's education and care services. The National Law requires all states and territories to regulate long day care, family day care, preschool and outside school hours care (OSHC) to meet the standards set out in the National Quality Framework. While In Home Care is a Commonwealth 'approved' service for receipt of Child Care Benefit (CCB), it remains outside the scope of the National Quality Framework implemented as part of the *Education and Care Services National Law 2011*.

Table 5: Regulation of ECEC for children aged 0 to 5 years, Australia, 2014

Legislation and Regulation	Centre-based group setting	Domestic group setting (provider's home)	Domestic setting (child's home)
Education and Care Services National Law	National Quality Standards	National Quality Standards	Interim Standards for In Home Care
Education and Care Services National Regulation (State based)	Includes: Long day care Outside School Hours Care	Includes: Family day care	Includes: In Home Care

Therefore, while there are no national regulations for the provision of In Home Care, there are Interim Standards, which are based on Tasmania's In Home Child Care regulation. There are approximately 5000 In Home Child Care places (National In-home Care Association, 2014), administered through approximately 70 services (National In-home Care Association, 2011). In Home Care educators are placed through provider organisations, and requirements for training and qualifications beyond the Interim Standards vary by organisation.

ECEC service providers outside the Commonwealth approved funding program (LDC, FDC, OSHC, and IHC) may apply for registration with the Department of Human Services. Registered child care includes services that may, traditionally, fall into the 'informal' domain of ECEC, such as grandparent, nanny, or friend or relative. Other types of registered care include some state-licensed preschools or kindergartens, playschools, and mobile services. Some Registered service providers are required to register with the Government, while others (including nannies and grandparents) have the option to register so that families are eligible for receipt of a (reduced) subsidy (of approximately $33 per week). This brief outline of funding and regulation reforms in Australia since the 1970s illustrate that while ECEC services have arguably been formalised through inclusion under legislation or approved to receive government subsidies, in-home child care services (approved and registered) are not required to meet the same standards as other approved services, namely long day care, family day care and Outside school hours care. The Coalition government, elected in September 2013, called for a Productivity Commission into early learning and child care. The Productivity Commission's draft report, released in July 2014, recommends extending

subsidies to families using nannies and other forms of in-home child care, under the condition they attain a Certificate III qualification. At the time of writing, there are few details of the subsidy and regulation and it is unknown whether the Coalition Government will adopt the recommendations (Australian Government, 2013; Productivity Commission, 2014). The debates surrounding nannies leading up to the Productivity Commission inquiry are discussed further in Chapter 6.

United Kingdom

The UK was the last of the three study countries to introduce ECEC legislation and take on public responsibility for the regulation and funding of care and education services for young children. It was also the last to formally support in-home child care, although the hiring of nannies and domestic help is arguably embedded in British culture (see Chapter 4). As Chapter 4 discussed, prior to the *Children's Act 1989*, responsibility for funding and regulating ECEC services was primarily determined by local councils. Public funding was provided directly to centre-based services, while other care arrangements, particularly childminders and nannies, remained a private responsibility. Although the Liberal and Labour parties announced their commitment in the early 1990s to provide universal child care, the agenda shifted in 1995 when demand-side funding measures (childcare vouchers) were introduced to increase private provision (Randall, 2002). In 1997 the National Childcare Strategy expanded ECEC options for children and provided financial assistance for working families to help with the costs of child care. This included the flagship program, Sure Start, established as a targeted program to address poverty in disadvantaged neighbourhoods and, in 1999, the childcare element of the Working Tax Credit allowed working families on low-incomes using formal child care services – namely nurseries and childminders – to claim up to 70 per cent of their childcare costs. The Early Years Free Entitlement was also introduced in 1998 and (since expanded in 2004) offers 15 hours of early years provision to 3- and 4-year olds (and now some 2-year olds) (Lewis & Campbell, 2007b).

The Labour Government introduced the Home Childcare Approval Scheme in 2004, described as a "light touch voluntary accreditation scheme [to] extend the range of good quality childcare eligible for financial support" (Bourke, 2004). This policy allows

families using nannies or other in-home child carers registered (voluntarily) with the Office for Standards in Education (Ofsted) to claim the childcare element of the Working Tax Credit and employer sponsored childcare vouchers at the same level as other Ofsted approved ECEC, such as nurseries, childminders and preschools. The childcare clement of the Working Tax Credit allows families with incomes below approximately £35,000 to claim a proportion of their childcare costs (up to 70 per cent eligible for the maximum benefit). Employers may also provide financial assistance through Childcare Voucher schemes, or through workplace childcare. This is detailed further in the next section. It is estimated there are between 30,000 and 100,000 nannies in the UK, and 10 and 30 per cent of nannies are registered (Social Issues Research Centre, 2009).

The UK's legislative structure is implemented at the national level – England, Scotland, Wales and Northern Ireland. The *Children Act 2004* and the *Childcare Act 2006* and accompanying Regulations provide the legislative framework for England and Wales. The *Childcare Act 2006* designates primary responsibility to local authorities, leaving regulation and standards to the independent body, the Office for Standards in Education, Children's Services and Skills (Ofsted). Ofsted's regulatory framework classifies ECEC (or children's services) into two broad types of care: *Early Years* and *Childcare*, which impose different requirements on the providers (Table 6). Some of the differences in funding and regulation between England and Scotland are outlined in the next section.

Table 6: Regulation of ECEC for children 0 to 5 years, England and Scotland

Legislation & Regulation	Centre-based group setting	Domestic group setting (provider's home)	Domestic setting (child's home)
England *Children Act 2006* Ofsted registration	Early Years Register Preschools, Day nurseries	Early Years Register Childminders	(voluntary) Childcare register Home childcarers (nannies, *au pair*s)
Scotland *Regulation of Care (Act) 2001* *Care Commission (National Care Standards)*	Early Education and Childcare Standards Registered with Scottish Social Services Council (SSSC) Includes: Nurseries, crèches, outside-school hours care, playgroups, preschools[22]	Early Education and Childcare Standards Registered with Scottish Social Services Council (SSSC) Includes: Childminders	Childcare Agency Standards Includes: Nannies, other home childcarers

The recent enactment of the *Children and Families Act 2014* includes a number of reforms to the regulation of ECEC services, particularly the introduction of childminder agencies (UK Government, 2014c). The announcement of the Tax-Free child care scheme is also discussed later in this chapter.

Canada

Canada stands out among these three countries for not having national ECEC legislation. Instead responsibilities for regulating the care and education of young children are held by the provinces and territories. However, federal government support for in-home child care has been introduced through tax measures and immigration policy (Table 7). The Child Care Expense Deduction (CCED) was established in 1971 and is arguably a culturally accepted alternative to subsidies for regulated ECEC. The

---

[22] Shared responsibility with Education Scotland

Live-In Caregiver Program (formerly the Foreign Domestic Movement from 1981) was introduced in 1992 and is viewed as an alternative to centre-based care for many middle- and higher-income families.

There is no federal ECEC policy framework and the provinces hold responsibility for regulating ECEC services. For this reason, attention is given to broad initiatives at the national reform, namely tax measures and immigration programs, as well as provincial reforms in Ontario. In Ontario, the most populated province, the (very out dated) *Day Nurseries Act*[23] (1948) legislates all types of care for children aged 0 to 12 years in Ontario. Services are licensed by the provincial government as either Day Nurseries (child care centres) or Private-Home Care (home-based/family day care) and must comply with these structural and operational standards. The *Day Nurseries Act* recognises informal, unregulated, home-based care as an individual providing care for up to five children in their own home. While this type of care is *not* licensed, it is included in studies on non-parental care (Bushnik, 2006) and is permitted by provinces and territories as long as the maximum number of children is not exceeded (Childcare Resource and Research Unit, 2013). Services licensed under the *Day Nurseries Act* are eligible to apply to municipalities to hold Service Contracts in order to receive operational and fee subsidies from the provincial government. There are a limited number of fee subsidies for low-income families using licensed centre- or home-based services.

---

[23] The Child Care Modernization Act proposed in December 2013 to repeal the Day Nurseries Act. At the time of writing (June 2014) it was not yet implemented.

Table 7: Regulation of ECEC for children 0 to 5 years, Canada (and the province of Ontario)

Legislation & Regulation	Centre-based group setting	Domestic group setting (provider's home)	Domestic setting (child's or provider's home)
Canada (Not applicable)	NA	NA	Live-In Caregiver program Immigration and Citizenship Canada
Ontario *Day Nurseries Act 1948*	License and municipal government operational standards Includes: Day nurseries	License and municipal government operational standards Includes: Private-Home Care (5 children or more)	Not regulated Includes: All forms of home/in-home child care for up to 5 children

The Child Care Expense Deduction provides financial support to families using any form of regulated or unregulated ECEC. The Child Care Expense Deduction (CCED) and the Live-In Caregiver provide a makeshift solution to addressing increasing workforce participation among mothers. The Child Care Expense Deduction enables working parents to deduct up to $7000 in child care costs per child (under 6 years) from taxable income, regardless of whether the arrangements are regulated or unregulated. A tax deduction is different to a credit and is more generous to high income families (Harder, 2004). In 2006 the Conservative Harper government introduced the Universal Child Care Benefit (in addition to the CCED). This initiative was implemented as an alternative to the development of the Liberal government's Multilateral Framework Agreement on Early Learning and Care. The Liberals' proposed universal framework was scrapped for the 'Universal Child Care Benefit', in the form of $100 per month per child under 6 years.

Canada differs from the other two countries as in-home child carers are not registered with any ECEC government agency or regulatory body. Immigration policy facilitates the use of in-home child care through the Live-In Caregiver program, which brings in approximately 14,000 caregivers per year (Kelly, Park, de Leon, & Priest, 2011). The Live-In Caregiver program (LCP) offers an avenue for migrant workers (primarily

women) to settle permanently in Canada. The program requires caregivers to work in the home of their employer (family) for two years before permitting them to apply for permanent residency. This immigration scheme underpins much of the policy analysis of in-home child care in Canada, as will be discussed in the next section.

In Ontario, and other provinces, early childhood education and care is at the forefront of current policy agendas. The *Child Care Modernization Act* was proposed by the Liberal government in 2013 (to repeal the Day Nurseries Act). A second initiative is the proposed regulatory changes, which are supported by various advocacy groups in principle, however there are considerable concerns about the "critical lack of infrastructure and capacity to address the needs of the Early Learning and Child Care sector in Ontario" (Ontario Coalition for Better Child Care, 2014).

Overall, ECEC policy in Canada consists of a patchwork of funding and programs that vary across provinces and municipalities (Friendly & Prentice, 2009). The only federal level initiatives designed to help families with child care are the Universal Child Care Benefit, the Child Care Expense Deduction and the Live-In Caregiver program. The federal block grant to the provinces through the Canadian Health and Social Transfer (CHST) does not designate funds directly to child care, and it is therefore at the discretion of provinces how much, if any, federal funding is spend on ECEC.

Policy intersection: In-home child care design and detail
As discussed in Chapter 2 the details of policy mechanisms are critical to comparing the implications for ECEC and broader social policy outcomes. This section uses a comparative approach to analyse the details of in-home child care policy in each country, namely:

- ECEC legislation and regulation in relation to in-home child care;
- financial support through specific programs, subsidies and tax measures, and;
- immigration policies that facilitate families having a care worker in their own home.

It should also be noted that various child and family benefits and tax measures can intersect with ECEC funding mechanisms to make care more or less affordable across different socioeconomic groups. While this is no doubt an important aspect of social

policy analysis for families with young children, these benefits and tax measures are outside the scope of this analysis.

Legislative and regulatory contexts in each country provide the overarching framework to analyse the funding and regulation of in-home child care. One important difference is variation in the departmental responsibility for in-home child care: in Australia and England responsibility for ECEC sits with the education department, in Scotland it remains under the Care Inspectorate; in Canada in-home child care (through the Live-In Caregiver program) sits in the Department of Immigration and Citizenship (outside any form of care or education), although it should be noted that responsibility for ECEC in the province of Ontario is with the Department for Education. In-home child care arrangements in Canada outside the Live-In Caregiver program are not guided by any ECEC policy or legislation. However, in both cases families using in-home child care are eligible for the Child Care Expense Deduction. This simplified overview (Table 8) of the three countries' in-home child care programs identifies the general differences in how governments fund and regulate in-home child care.

Table 8: Government regulation and funding of in-home child care

	Australia *In Home Care*	United Kingdom *Home Childcare Registry*	Canada *Live-In Caregiver*
Regulation and Standards	Department for Education, Employment and Workplace Relations (DEEWR)	Office for Standards in Education, Children's Services and Skills (England) The Care Inspectorate (Scotland)	Department for Immigration and Citizenship
Subsidies and tax measures	Department for Education, Employment and Workplace Relations (Child Care Benefit and Child Care Rebate)	HM Revenue and Customs (Child care element of Working Tax Credit; Childcare vouchers)	Canada Revenue Agency (Child Care Expense Deduction)

Policy analysis requires attention to the complex interaction of multiple components of the policy arrangement. For ECEC, this includes the details of the policy mechanisms and the requirements placed on users (families) and providers (organisations and individuals). Governments' regulatory framework guides users' eligibility to access services and funding. And, on the provider side, regulatory frameworks dictate the

requirements of ECEC services – both organisations and individual workers – with respect to their operations and staff qualifications or standards. These policy mechanisms interact to create a complex picture of the intersection between providers and users. With ECEC, for example, government subsidies may be very generous and impose few eligibility requirements for families, but may be limited to users of specific types of services (for example, centre-based services where all staff have minimum qualifications). Conversely, generosity may be low, with strict or minimal eligibility, but have no restrictions on the types of ECEC used (to include care by informal or formal carers). Various scenarios may exist depending on the interaction between:

1. Families' eligibility (income, work status, other family / circumstantial characteristics)
2. Generosity of subsidy or tax measure
3. Types of care eligible for subsidy or tax measure
4. Care workers' qualifications & criteria for registration/regulation (organisations and individuals)
5. Workers' rights/conditions (including immigration)

The intersections of these policy details impacts the place of in-home child care and, as it is argued, reflect broader divergences in ECEC priorities. Policy mechanisms may facilitate families' use of in-home care and, at the same time, the lack of coherent ECEC policy structure, in turn, pushes families to alternative forms of care arrangements (Sipilä et al., 2010), such as informal and unregulated care provided in or outside the child's home. It is evident that policy mechanisms intersect in different ways. The various components are shaped by different objectives and rationales (Chapter 6) and have implications for families and care workers (Chapters 7 and 8). The next three sub-sections compare the policy details in each country across i) Regulation, ii) Funding and iii) Immigration.

Regulation

As discussed in the previous section, regulatory frameworks set out the requirements of different types of services. In the case of early childhood education and care, regulations are likely to include structural and operational requirements, including staff ratios and qualifications and the curriculum. However, a set of regulations may apply different

standards to different types of care. For example, in all three countries included in the study, centre-based care and forms of home-based/family day care are regulated by the government; however the standards for qualifications, curriculum and safeguarding differ.

Across the three countries the set of regulations which apply to different types of ECEC offer interesting points of comparison for examining the detail and intersection of policy. This section discusses how these regulations apply to in-home child care, in contrast with i) other types of ECEC in their respective jurisdiction, and ii) across jurisdictions. Two main aspects of regulation are considered: staff/carer/teacher qualifications and curriculums.

Qualifications

Qualifications in early childhood education and care cover diverse and contested domains of health and safety, maternal and infant care and learning and development. In each of the study countries, debate exists across the sector about what constitutes a 'qualified' educator or carer in different ECEC settings. Divisions remain across the sector in relation to the desired criteria for 'qualified' ECEC staff. This section identifies the relevant qualification structures and processes for approval, while also highlighting angles for debate and controversy.

As the care of children is increasingly focused on education, government regulation promotes (in rhetoric, but not always policy) the quality of services. There is therefore greater emphasis on the type and levels of qualifications that staff are expected to attain. As discussed in previous chapters, the 'care' and 'education' of young children was traditionally separated. In 'education' settings, such as preschool and kindergarten, qualified staff were generally those with a teaching qualification; whereas in 'care' settings (such as nurseries) baby nurses, nannies and social workers were recognised as qualified caregivers (For the UK see McGillivray, 2008).

ECEC qualifications, especially early childhood degrees and diplomas are increasingly recognised in policy regulations as important requirements in centre-based settings including preschools and kindergartens. Debate continues surrounding the ratio of qualified staff to children, the type (teacher, care worker, nurse) and the level

(certificate, diploma, degree) of qualification. This debate extends from centre-based 'early education' settings to other forms of ECEC, including childminders and family day care and, more recently, in-home child care. The details below illustrate that under the current regulatory frameworks there are minimal qualifications and standards for in-home child care. However, wide variation still exists across the study countries.

Table 9: Registration requirements for in-home child care workers

Country (Program)	Guiding policy or standards	Registration requirements of in-home child care worker
Australia *In Home Care*	Interim Standards for In Home Care (not legislated)	First Aid Certificate Meet state licensing requirements State safety clearance checks Names of two referees
United Kingdom <u>England</u> *Home Childcare*	Voluntary Childcare Register (Childcare Act 2006)	First Aid Certificate Qualification at minimum level 2 in area of work relevant to childcare, or training in Common Core of skills and knowledge for the children's workforce Criminal Records Bureau Check Covered by their own insurance
<u>Scotland</u> *Home childcare*	National Standards for Child care Agencies (Regulation of Care (Scotland) Act 2001)	Registered with Childcare Agency Criminal Records Check First Aid training
Canada *Live-In Caregiver Program*	Live-In Caregiver program requirements (not legislated through ECEC, only through immigration)	Completed equivalent of Canadian high school 6 months training in classroom setting Speak and read English or French

In *Australia*, the qualification requirements for long day care, family day care, and In Home Care differ, even though they are all approved by the Commonwealth government for receipt of Child Care Benefit (CCB). With the introduction of the National Quality Framework the required qualifications in each of the settings fall under the National Regulations. Findings from the interviews revealed mixed views among the ECEC sector in Australia about whether In Home Care should be brought under the National legislation.

Neither the Commonwealth approved In Home Care scheme educators or Department of Human Services registered carers are required to hold any formal qualifications, although, according to some interviewees, In Home Care provider organisations may require educators to have or be working toward Certificate III. The Commonwealth Interim Standards for In Home Care requires *non-carer staff* (i.e. staff in coordination units) to hold approved qualifications, and maintain the currency of these qualifications through annual professional development and training. The Standards state that *carer staff* (providing care in the child's home) must have appropriate knowledge, skills and experience related to children's development, health and safety, but holds no legislative requirement (Table 9). Approved and Registered in-home care providers (with the Department for Human Services) must meet any state or territory legislation. This clause is relevant under the National Law which does not include In Home Care[24].

In the *United Kingdom*, centre-based (nurseries) and home-based care (childminders) are regulated by different regulatory bodies across the jurisdictions. Ofsted, the independent regulatory body for care and education, is responsible for establishing and monitoring standards for services in England and Wales. The Care Inspectorate has similar responsibilities in Scotland. In both jurisdictions centre-based, home-based, and in-home child care are legislated by the *Children Act 1989* (which applies to the United Kingdom) and regulated by their respective independent regulatory authorities (Table 6). In England Ofsted, under the *Childcare Act 2006*, sets the qualification requirements for staff working in registered Early Years and Childcare settings. All providers caring for children from birth to five years (except carers in the child's home) must register with the Early Years Register, however the required qualifications across the settings differ. Staff working in nurseries and preschools must hold a "full and relevant" qualification approved by Ofsted, while, on the other hand, childminders are required to

---

[24] Prior to the National Law, South Australia and Tasmania included in-home child care (regardless of whether it was part of the In Home Care scheme) under their regulation, which required carers to be registered and hold minimal requirements, such as a first aid certificate and policy check.

take an approved training course through their local authority and to hold a first aid certificate (Ofsted, 2014b). Nannies and in-home child care workers are required to hold a minimum level 2 qualification "in an area relevant to child care" or to have training in the document 'common core skills and knowledge for the children's workforce' (Ofsted, 2014a)(see Table 9). As mentioned earlier, Ofsted's voluntary Childcare Register is intended for nannies or *au pair*s. The Register was introduced in 2004 to recognise the need for more flexible arrangements and a broader demand for work-related ECEC. The quality of care was not a priority of the government at its inception (as discussed in Chapter 6). Criticism surrounding the Register has centred on the lack of accountability and false sense of monitoring that parents and families are given in hiring an individual registered with Ofsted.

In Scotland, staff working in centre-based nurseries and preschools must be registered with the Scottish Social Services Council (SSSC), and must hold certain qualifications based on the type of setting and position they hold. Practitioners in nurseries, crèches and playgroups must hold a qualification approved by the SSSC (Scottish Social Services Council, 2011). The regulatory framework for staff working in a setting registered with the Care Inspectorate differs from those working in a preschool setting – which is legislated by Education Scotland. In-home child care workers are affiliated with a Childcare Agency and are not required to hold any specific qualifications. They are, however, monitored through the approved Childcare Agency and must meet the standards and guidelines established by these organisations. In some cases, the in-home child care workers are provided with training and qualifications through these organisations.

In Ontario, in *Canada*, the two types of ECEC that are regulated are centre-based and licensed home-based care[25]. The regulatory requirements of centre-based and licensed

---

[25] *Unlicensed* home-based care is provided in a caregiver's home for five children or less and the provider is not required to meet any operating criteria. This is different to Australia and the UK, where such care is illegal, and care for a group of unrelated children in a private home must be licensed to operate.

home-based child care in Ontario are set out in the *Day Nurseries Act*. Ontario does not regulate in-home child care as a form of ECEC provision. Care provided in the child's home is seen as a private arrangement and therefore not included in the definition of 'child care' in the Day Nurseries Act. However, it is important to note that the recent Ontario Ministry of Education agenda, *Modernizing Child Care in Ontario*, identifies strategies to encourage the use of unregulated care through a registry of informal care workers (Ministry of Education, 2012). The policy complexities of in-home child care policy in Canada are reflected in the interaction between funding through the federal tax system and immigration policies. These policies are detailed later in this chapter.

Curriculum

The regulatory frameworks implemented in each country also establish guidelines for the curriculum practiced in different ECEC settings. Curricula may be legislated through regulation or, in other cases, they may be recommended but not necessarily practiced in all settings. Each country (or jurisdiction) recently developed a curriculum for early years settings; however the guidelines differ in terms of the ages the curriculum applies to, the particular ECEC settings that are required (or encouraged) to practice the curriculum, and the mechanism through which the sector is required to adopt the curriculum.

Table 10: Curriculum frameworks for ECEC, Australia, the UK and Canada

	Curriculum	Settings & Application
Australia	Early Years Learning Framework (0 to 5 years)	Legislated under the National Law. Applies to: Long day care and Family day care
United Kingdom		
England	Early Years Foundation Stage (0 to 5 years)	Legislated under Childcare Act 2006 Applies to: Ofsted *Early Years* services (nurseries, childminders, preschools)
Scotland	Pre-birth to Three Guidelines (0 to 3 years) Curriculum for Excellence (3 to 18 years)	Principles and recommendations
Canada		
Ontario	Early Learning for Every Child Today (0 to 8 years)	Guiding principles to for all children's services

This brief overview of the ECEC regulatory frameworks in Australia, the UK and Canada illustrates the range of approaches governments adopt to establish and monitor the quality of education and care services for young children. While some countries are interested in ensuring minimum standards for all services and providers, such as through health and safety training standards, others focus on the 'education' qualifications of staff in some settings. This is particularly evident in Canada, where 'early childhood' teachers in Ontario must hold a diploma or degree, while licensed home-based workers and support staff in centres are not required to hold any formal qualifications.

Overall, in-home child care workers are not bound by specific qualifications or standards in any of the three countries. Where there are guidelines or voluntary registration requirements for those workers, they are generally pretty low – and lower than workers in licensed centre-based or group-based settings. Recent initiatives to increase the qualification levels of staff in mainstream settings (centre- and licensed home-based) are central to campaigns for fair remuneration and working conditions for workers in a female-dominated sector. The next section extends this comparison of ECEC and in-home child care regulation in the three countries to indicate the extent to which funding and subsidies are linked to regulatory requirements.

Fee subsidies and tax measures

Legislation in each country, described above, also determines the types of services and providers that are eligible for receipt of subsidies and other financial support. While policy reforms can change the eligibility and generosity of funding for ECEC services, funding mechanisms must operate within the limits of the legislation and regulatory framework, discussed above. In some cases, legislation requires that providers (organisations and individuals) meet a set of standards or criteria, or regulation. In other cases, the legislative requirements are not directly connected to users' receipt of financial assistance, such as some subsidies and tax measures.

Early childhood education and care systems, along with many other types of social services, are complicated by the various funding streams and separation of departmental and governmental responsibilities. For example, in Australia, the Commonwealth Government funds most ECEC services, however the state governments are responsible for approving and monitoring the services. Also 'child care' and 'early education' programs receive funding through separate policy mechanisms and sources. Similarly, in the UK, funding is primarily delivered through tax credits and vouchers administered by HM Revenue and Customs, while services are largely delivered and monitored at the local level (however this is changing). And, in Canada, ECEC services are subsidised through the federal tax system and transfers to provinces, even though the provinces hold legislative responsibility for ECEC. The complexity of ECEC funding arrangements are detailed below, where special attention is paid to the funding mechanisms supporting both regulated and unregulated forms of in-home child care in each country.

Table 11 below outlines the funding available for different types of in-home child care in each country. It indicates the eligibility criteria for families and the generosity of the subsidies or tax measures. It is important to note that the average incomes of families differ in these three countries, and different measurements achieve different outcomes. The OECD reports that for a couple with two children the average annual net income is the highest in Australia ($46,344), followed by the UK ($41,451), and Canada ($35,471). These figures must be taken with caution, as they are based on 100 per cent average wage and we know that the part-time employment rate, especially for women,

varies across these countries. It also does not account for Purchasing Power Parity (Organisation for Economic Co-operation and Development, 2013, Tables S.5 and S.6). These figures are still useful to compare the income cut-off points and generosity of subsidies, outlined below.

Table 11: Financial support for in-home child care

Country & type of care	Financial Assistance	Eligibility criteria	Income cut off	Generosity
Australia *In Home Care* (Approved) *DHS registered**	Child Care Benefit (CCB) and Child Care Rebate (CCR)	Child disability Family or guardian disability Rural or remote location Employment schedule that prevents use of mainstream service (i.e. LDC or FDC) Three or more children under school age	CCB – approx. $150,000 family income *DHS Registered – No CCR – No	CCB – up to approx. $200 per week (IHC) *$33.30 per week (DHS registered) CCR – 50% costs up to $7,500 per year
United Kingdom *Home Childcare* (voluntary Ofsted register)	Childcare element of Working Tax Credit Childcare voucher	Both parents must be working 16 hours or more per week to claim Childcare vouchers or tax credits (same as other forms of registered child care)	Approximately £35,000 (Tax Credits) Childcare vouchers – No (employer sponsored)	Up to 70% of costs up to £122 per week (approx. £6,300 per year = approx. $10,000 per year)
Canada (Any informal or formal arrangements, including Live-In Caregiver)	Child Care Expense Deduction	Receipt for any form of (informal or formal) care for children up to age 7 by a non-relative	No	Deduct up to $7000 per year (maximum value approx. $1500)

The table above provides a streamlined comparison of the differences between the three countries' approaches to funding in-home child care. Further details for each country, respectively, are discussed below.

Australia

As Table 12 illustrates, in Australia approval and regulation under the National legislation is not directly linked to receipt of subsidies. The Commonwealth is

responsible for the majority of 'child care' funding through the CCB and CCR, while the states and territories fund (to different extents) early education (or preschool) programs. Some services not covered under the National Legislation are still approved by the Commonwealth for receipt of CCB and CCR, namely In Home Care and occasional care.

Table 12: ECEC services for children 0 to 5 years, Australian (Commonwealth) regulation and funding approval arrangements

	National Law	Approved for CCB and CCR
Long day care	Yes	Yes
Family day care	Yes	Yes
In Home Care	No	Yes
Occasional care	No	Yes
Preschools	Yes	No

This means that, while users of In Home Care are eligible to receive the approved rate of CCB, the individual In Home Care educators are not required to meet the standards and qualifications set out in the National Quality Framework (Table 9). Eligibility to use In Home Care is based on meeting specific criteria, which generally require that an individual is unable to access mainstream ECEC services (Table 11). Families who do not meet the criteria for In Home Care – or who meet the criteria but are not able to access an In Home Care place through a provider – may seek reduced levels of support from the government by having their care provider register with the Department for Human Services to receive the reduced CCB. Grandparents and informal in-home carers – or nannies – are the most common form of registered care. Families using registered care are eligible to claim a reduced rate of CCB provided parents have a "work-related commitment" at some time during the week. Unlike approved CCB, there is no income threshold for receipt of registered CCB. Users of registered care are not eligible for CCR.

Overall, funding for in-home child care in Australia is therefore generous for families eligible (and able) to access the formal In Home Care program, while minimal financial assistance is available to families through the CCB where their caregiver is merely

registered with the Department of Human Services. This is different to the UK and Canada, outlined below.

United Kingdom

Funding responsibility for ECEC in the United Kingdom is split between the central government and jurisdictions. Ofsted registered Early Years services and Childcare services are funded by the central Government through tax credits and childcare vouchers (UK Government, 2014b). The tax credit covers up to 70 per cent of costs for families with an income under approximately £6,500 ($12,000), which equals a maximum of approximately £6,344 ($11,440) per year for one child. Families earning up to approximately £35,000 may be eligible for a lower amount. Families eligible for employer childcare vouchers can receive up to £2,860 per year ($5,200) (HM Revenue & Customs, 2013, 2014). The eligibility threshold for both the tax credit and vouchers were more generous when introduced in 1999.

While the funding mechanisms are administered at the central level, individual jurisdiction regulations determine the scope and criteria of service providers included. For example, in England in-home child care workers must be individually registered with Ofsted for families to claim tax credits, while in Scotland in-home child care workers must be part of a Childcare Agency that is registered with the Care Inspectorate.

Table 13: ECEC services for children 0 to 5 years, Regulation and funding approval, England and Scotland

Type of care	Registration	Eligible for WTC and Childcare vouchers
Nurseries	Ofsted Early Years register (England) Education and Care Services Standards (Scotland)	Yes
Childminders	Ofsted Early Years register (England) Education and Care Services Standards (Scotland)	Yes
Playgroups	Ofsted Childcare Register (England)	Yes
Nannies, in-home care	Voluntary Childcare Register (England) Childcare Agency Standards (Scotland)	Yes

In Scotland, families must be using ECEC services registered with the Care Inspectorate as Early Education and Care providers or Childcare Agencies. Families using providers registered with the Care Inspectorate, including childminders and in-home child care through Childcare Agencies, are eligible for the childcare element of the Working Tax Credit and childcare vouchers. Childcare Agencies facilitate the use of in-home care by matching families with in-home care workers.

In both England and Scotland there are independent in-home care models that in practice have similar purposes and a similar model to the In Home Care Scheme in Australia, although they operate within very different policy structures. Models of home childcare operates in England and Scotland[26], which focus specifically on families requiring an educator to come into the family's home, mostly for reasons relating to non-standard work patterns. Families accessing this service are eligible for Working Tax Credits (if they meet the work and mean-test) or childcare vouchers covered by their employer, but their fees may be further reduced by funding provided by the organisation. In Scotland, organisations providing this service must be registered as a Childcare Agency. These services fill a genuine gap in demand for flexible ECEC for families.

Funding for in-home child care in England is limited to families whose caregiver voluntarily registers with Ofsted – often a request of the family for subsidy purposes; and in Scotland funding is limited to families who choose to hire through a Childcare Agency. Critics of the system contend that funding for in-home child care – through the childcare element of the Working Tax Credit (WTC) and childcare vouchers – does not assist those families using in-home child care because the WTC is means-tested and the childcare vouchers are employer dependent. Advocates and Childcare Voucher

---

[26] @HomeChildcare operates in northern England and One Parent Families in Scotland and provide flexible in-home child care to families across all income levels. The care providers are employed by the organisation, not by the families.

companies therefore argue that they should be expanded to all families, rather than linked to employers.

ECEC funding is currently in flux in the UK as the proposed *Tax-Free Childcare* scheme (announced in 2013) is expected to be rolled out in 2015. Additional assistance to low-income families is included as part of the Universal Credit (expected to replace the current Working Tax Credits). Tax-free childcare will allow parents on joint incomes up to £150,000, who don't already receive support through tax credits, to claim up to 20 per cent of their child care costs, up to £2000 per year for each child. Debates surrounding these reforms are centred on the potential impacts on low-, middle- and high-income families with critics arguing that the proposed tax-free childcare and the Universal Credit will impact low-income families in a disproportionately negative way.

Canada

Funding for ECEC in Canada is administered and delivered through a mix of federal, provincial/territory, and local government responsibilities. However, unlike Australia and the UK, there is no national framework and federal transfers to provinces are not made accountable through regulation of services at the provincial or local levels.

Table 14: ECEC for children 0 to 5 years, regulation and funding arrangements, Canada (and province of Ontario)

Type of care	**Registration or Regulation**	**Child Care Expense Deduction (Federal)**	**OntarioWorks Subsidy Program (Provincial)**	**Ontario Fee Subsidies**
Day nurseries	Yes (Provincial)	Yes	Yes	Yes
Licensed Home based care	Yes (Provincial)	Yes	Yes	Yes
Unlicensed home-based care	No	Yes	*Discretion of municipalities*	No
In-home child care	No (only through Live-In Caregiver program)	Yes	Yes	No

There are two federal funding mechanisms: the Universal Child Care Benefit (UCCB) and the Child Care Expense Deduction (CCED). The UCCB is a payment of $100 per month per child aged from birth to six years regardless of income, workforce participation or use of child care. For analytic purposes, the UCCB is a family cash

benefit, and is not included in analysis of ECEC policy. However, the rhetoric used by the Conservative Government when it was introduced in 2006 supports the idea that the payment contributes to the cost of families' *choice* of ECEC arrangements − whether regulated/unregulated, formal/informal, public/private or parental/non-parental (Richardson, Langford, Friendly, & Rauhala, 2013).

As mentioned earlier, the second federal funding mechanism is the Child Care Expense Deduction (CCED), which enables working parents to deduct up to $7000 in expenses related to the cost of child care (and related activities) per child from birth to 7 years (Table 11). Unlike the UCCB, receipts must be kept to prove the use of child care, however the costs covered are well beyond the scope of ECEC; they include sports classes, overnight camps, and other extracurricular activities. Formal and informal care is eligible for the CCED, as long as the care provider is over 15 years and not an immediate family member (with the idea to exclude sibling and grandparent care from being deducted).

There were clear contradictions in the Conservative party's policy that introduced these funding mechanisms. Tax breaks were designed to uphold the male breadwinner model (but only for middle-class families) and, if they chose to work, the Child Care Expense Deduction supported families "to leave their children in the care of an unofficial service, a family member or a neighbour if that works best for them" (Teghtsoonian, 1995, p. 434). However, they failed to recognise that these 'choices' are not always available (and tax deductions are of less benefit) for the low-income families "in economic need" that were encouraged to seek paid employment. Despite critique from child care advocates that tax deductions both facilitate unregulated care and favour higher-income families, the federal government rationalised its continuation as an employment measure, rather than a child benefit (Baker & Tippin, 1998, p. 131; Harder, 2004).

Additional fee subsidies for low-income families are funded by the provincial government (Ontario) under the Ministry of Education, and are administered and delivered by the municipal and regional governments, through agreements with Consolidated Municipal Service Managers (CMSM) and Regional Social Service Administration Boards (RSSAB). Eligibility is based on parents' participation in

employment and family income. Child care fee subsidies in Ontario do not support informal or in-home care through any specific programs or funding mechanisms, compared to Australia's In Home Care scheme and registered care provision. However, the Day Nurseries Act lacks specificity about the relationship between the operating requirements and the autonomy of local administration bodies to distribute fee assistance according to the funding available and their own priorities of service provision. With funding cuts and embedded policy systems in place, the large majority of CMSMs and RSSABs restrict funding from the Ontario government to licensed centre based and licensed home based service provides. An additional complexity is that CMSMs and RSSABs also have autonomy to fund in-home child care. While this is not common practice, it illustrates that policy systems in place do not restrict provincial fee subsidies from funding informal, unregulated in-home child care.

Additionally, the province's OntarioWorks program was established in 1997 to facilitate parents' workforce participation through a number of financial and service supports. The intent of the OntarioWorks program is:

> to help people in temporary financial need find sustainable employment and achieve self-reliance through the provision of effective, integrated employment services and financial assistance (Government of Ontario, 2008, p. 1)

The Child Care Support component of OntarioWorks "covers the actual cost of formal/licensed child care, and informal/alternative child care arrangements up to the established maximums" (Government of Ontario, 2010, p. 2).

Summary

The discussion above identifies a number of divergences with respect to the regulatory frameworks and qualification requirements in each of the study countries. Furthermore, the analyses shows that quality regulation is not always linked to eligibility for financial assistance for ECEC arrangements. In these three countries inconsistencies exist with respect to the accountability of funding and quality regulation for different types of care. In the UK and Australia, care workers must meet minimal criteria to register as approved providers to enable families to access to financial support. The tensions between funding and quality regulation are most evident in Canada where the CCED is

144

purely a work-related expense deduction with no consideration of the quality of the care arrangements for children or the working conditions of care workers. While the generosity of the UCCB and CCED is relatively low, the demand side funding approach with no requirement to use regulated, or even registered, providers means families have little incentive to seek out (largely) high-cost licensed care when the money can be used toward other care arrangements – or however else they choose. The case of Ontario outlines how funding mechanisms, and their interaction with overarching regulatory frameworks, facilitate the use of, largely unlicensed and informal, in-home child care. In addition to these provincial arrangements, families are able to receive financial assistance for all child care arrangements through the Child Care Expense Deduction.

The section above reveals the incongruence of funding and regulation for different types of ECEC in each country; however it does not incorporate a key feature of in-home child care policy – that is the role of immigration policy in shaping the supply and demand of in-home child care workers. The next section contrasts the policy structures in the three study countries to illustrate the complex intersection between migration and care policies.

Immigration policy

Migration is rarely included in analyses of early childhood education and care policy. Examination of the divergent immigration policies in each country reveals how the *details* and *intersection* with different policy areas (namely ECEC) offer a rich lens for comparison of the circumstances through which Government policy facilitates in-home child care in different, and sometimes unintended, ways. The extended discussion on Canada's Live-In Caregiver program identifies the interaction between policy mechanisms and broader cultural acceptances of ECEC arrangements, which are discussed in greater detail in Chapter 7.

Table 15: Migration policy and formal schemes for in-home child care workers, Australia, the UK and Canada

	Formal migration scheme for in-home child care	Other visas & pathways enabling domestic work
Australia	No	Working Holiday Visa /Work and Holiday Visa
United Kingdom	No (Domestic Worker visa for foreign temporary employers)	EU & EFTA nationalities Youth Mobility Scheme
Canada	Live-In Caregiver Program	Working Holiday Maker

Australia: Outlier…for now?

Australia is the only one of these three countries which does not formally support in-home care through migration. A proposal to bring Pacific Islander women to Australia as domestic workers was considered to fill the gap in demand for caregivers in the mid-2000s. However this was largely geared toward the elder care sector, and was never formally implemented. In recent federal child care inquiries by the Senate (2009, 2014) and Productivity Commission (2014), submissions have proposed the recruitment of migrant workers to meet demand for flexible, affordable, child care. However, at the time of writing, immigration policy is not a salient issue for ECEC in Australia.

The only immigration scheme that does allow migrants to provide in-home child care is the Working Holiday Visa (Au Pair World, 2014). This scheme attracts young women from Europe, particularly the UK, to work as *au pair*s for families. While it is promoted as a 'cultural exchange' program, it is used by families as an affordable ECEC option. Similar to the UK, and in contrast to Canada, *au pair*s apply for a different visa depending on their nationality. The 'Working Holiday Visa' (417) and 'Work and Holiday Visa' (462) allow young people between the ages of 18 and 30 years to live with the same family in Australia for six months or one year, with the possibility for a 12 months extension. Families are not required to pay *au pair*s minimum wage, but rather it is recommended they pay $6 per hour as 'pocket money', which usually works out to between $180 and $250 per week.

While there is undoubtedly an informal market for in-home child care in Australia, there are few policy mechanisms that actively support the supply of in-home carers through

migration or demand through financial assistance. This is contrasted with the UK and Canada where the migration of care workers is increasingly common through the labour movement across the European Union (in the United Kingdom) and the formal migration scheme, the Live-In Caregiver program (in Canada). The limited support for largely informal and unregulated ECEC arrangements has mitigated further gender, class and racial inequalities in Australia, which is discussed in Chapter 7.

United Kingdom: culturally embedded or structurally promoted?

In-home child care is a traditionally accepted form of ECEC in the UK and, while many people perceive nannies as only for the rich, in-home child care in the UK is increasingly used by families from middle-income families. Many middle-income earners do not receive financial assistance for in-home child care because their income is above the Working Tax Credit cut-off and childcare vouchers are employer dependent (and therefore there is little incentive to have their nanny registered). Affordability of nannies is therefore not supported by the funding system for most families, but rather made possible because of recent migration from the European Union and European Economic Areas (EEA) countries where migrants (mostly women) are seeking employment in lower paid domestic settings, including as nannies and other domestic workers (Búriková & Miller, 2010). Nannies from overseas are largely more affordable than local, often trained, nannies and are known to be more flexible and accommodating in the hours they work and duties they are willing to perform (Busch, 2013; Williams & Gavanas, 2008).

UK scholars identify the growing trend in waged domestic labour as a response to the increased supply of migrant care workers able to move from Eastern European countries to the UK, and also the lack of available and affordable formal ECEC options (Busch, 2013; Cox, 2006, Chapter 6). Furthermore, the influx of migrant care workers to urban centres, particularly London, means families increasingly 'seek value for money' in a sector where care workers are forced to accept lower wages and poorer working conditions (Williams, 2012a; Williams & Gavanas, 2008). While it is expected that employers abide by employment regulations, there is also evidence that the availability of a low-paid workforce and lack of availability of flexible and affordable regulated options makes informal in-home child care the preferred arrangement for many families.

For individuals outside the European Union and other EAA countries, the Youth Mobility Scheme permits individuals aged 18 to 30 years old from eligible countries to live and work in the UK for up to two years. Applicants seeking employment as an *au pair* through the Scheme do not have worker or employee status, and therefore aren't entitled to the National Minimum Wage or benefits and leave entitlements. Instead, *au pair*s are usually provided with room and board and 'pocket money' of around £75 or £80 ($140) per week. Depending on how much pocket money *au pair*s are paid they may have to pay income tax (UK Government, 2014a). Similar to the Live-In Caregiver program in Canada, *au pair*s are not required to hold any ECEC qualifications or have any experience working with children. *Au pair*s are also able to register with Ofsted, providing they meet the criteria (NannyTax, 2014). As mentioned earlier, Ofsted registration enables families to receive the child care element of the working tax credit.

Reforms introduced in 2012 to the Domestic Worker Visa restrict entry of (non-EU) domestic workers with the exception of domestic workers accompanying foreign visitors (mostly diplomats). The Domestic Worker Visa is also limited to 6 months and workers are not allowed to seek employment with another employer. This led to calls by advocates, such as the community group Kalayaan, to reverse the reforms based on evidence of exploitation of these workers. These claims for migrant care workers' rights and working conditions are familiar to migrant care workers and critics of Canada's Live-In Caregiver Program.

Canada's Live-In Caregiver Program: default option or cultural norm?

Canada's immigration policy has the most explicit approach to support unregulated in-home child care. The Live-In Caregiver Program (previously the Foreign Domestic Workers program) offers an immigration stream for overseas workers to apply to work in domestic settings – caring for children, elderly or the disabled – for two years, and is promoted as a pathway to permanent residency in Canada.

As mentioned earlier in this chapter, the Live-In Caregiver program is part of Canada's skilled migration program, and since 1992 accounts for up to 14,000 entries into Canada per year (Kelly et al., 2011). Initially the Foreign Domestic Worker program was introduced in 1981 to fill a gap in the demand for care workers – particularly for young

children. The program has evolved over the past couple of decades in response to reviews and criticism surrounding the treatment of caregivers entering Canada on the Live-In Caregiver visa, as well as their pathway to permanent residency and employment once their initial two-year visa – and employment contract – terminates.

Table 16: Specifics of Live-In Caregiver Program, Canada

Requirements for caregiver CIC(a) and HRSDC(b)	Requirements for family (employer)	Caregiver obligations	Employer obligations	Eligibility for residency
Successfully completed the equivalent of Canadian high school education Completed at least 6 months of full time training; or worked as a full time caregiver for at least one year during the past 3 years Speak and read English or French	Proof that they or a dependant is in need of care (age of children) Proof of financial capability to pay Provision of suitable accommodation for caregiver	Provide care on a full-time basis (minimum 30 hours per week) to: children under 18 years of age[27] Live and work without supervision in the private household	Pay minimum wage ($10.77 in Ontario) for a min of 30 hours Overtime (1.5 times wage) for 44 to 48 hours per week (Deductions for meals and accommodation) 2 weeks vacation per year	Completed two years of live-in work (with no more than 2 employers) Have up to 4 years to complete the employment requirement to be eligible to apply for permanent residency

(a) Citizenship and Immigration Canada
(b) Human Resources and Skills Development Canada
Source: Employment and Social Development Canada (2013) Hiring Live-In Caregivers and Nannies, site: http://www.hrsdc.gc.ca/eng/jobs/foreign_workers/caregiver/#a07

Overseas workers seeking to enter Canada as Live-In Caregivers must have sponsorship from an employer (family). The employer must have sought and received approval to sponsor a Live-In Caregiver, which is based on a set of criteria indicating the reasons why a caregiver is required in the family home, such as young children, frail or elderly person, and also that the employer has the appropriate living arrangements and financial resources for the caregiver. Caregivers entering Canada through the Live-In Caregiver

---

[27] Also for elderly people and people with a disability

149

program are required to stay with their employer for a minimum of one year. At this point they are able to look for another family to work for a further year – to meet the two year period before they can apply for permanent residency allowing them to seek other employment.

While the program is open to any overseas workers, an overwhelming majority of workers entering through the Live-In Caregiver program are Filipino (Kelly et al., 2011). Employment and training opportunities are often not available in their home country and so many 'transition' to Canada through Hong Kong and Singapore, where they gain experience and / or qualifications required to apply for the program, and also gain access to agencies to administer their application (Kelly, Astorga-Garcia, Esguerra, & Community Alliance for Social Justice, 2009). Agencies play a significant role in monitoring these criteria and brokering eligible caregivers and employers. In many cases agencies have established partnerships in Hong Kong and Singapore where caregivers are currently living and working in order to recruit those eligible for the Live-In Caregiver program.

Recent policy reforms aimed to address issues surrounding the exploitation of caregivers, including a large number arriving in Canada to fake jobs. Prior to reforms in 2008, agencies required caregivers to pay a placement fee, plus the cost of their airfare. There are many stories of caregivers arriving in Canada to overcrowded living conditions while they are matched with an employer – often in the underground market. With aims to address the exploitation of caregivers, the federal government amended the rules in 2008 to require the employer (family) hiring the caregiver to pay for their flights. While this reform addressed some issues, including the oversupply of caregivers working in the grey market, stakeholders from the nanny sector indicated that new issues have arisen, including caregivers arriving in Canada and then leaving their job, at the expense of the employer (Nanny agencies, Canada-15, Canada-16, Canada-13). The Live-In Caregiver Program is established as an acceptable ECEC arrangement, and reflects a Government priority to retain ECEC in the private domain (Brickner & Straehle, 2010; Cho, 2013), opposed to pressures to increase the qualifications and status of ECEC professionals in the public sphere. These different pressures and debates are compared in relation to issues of gender, class and race in Chapter 7.

While there are likely many migrant Live-In Caregivers providing high quality care to young children, the program does not promote high quality provision and provides limited protection of working conditions for caregivers (see Table 16). The lack of government support for regulated, centre-based ECEC has provided families with few options to access quality ECEC. The Child Care Expense Deduction provides financial assistance to families using informal and private arrangements and thereby exacerbates concerns regarding the lack of funding for regulated, high quality services. With no federal funding designated to regulated services (and limited availability) families resort to alternative unregulated informal arrangements with a friend or neighbour or through the more formal – yet still unregulated – Live-In Caregiver program.

Contrasts and commonalities

The details of policy mechanisms create complex and often contradicting incentives and deterrents for using different ECEC arrangements. As the discussion in this chapter illustrates, the intersection of policy mechanisms impacts the availability, affordability and quality of both formal and informal care arrangements and therefore shapes families' demand for certain types of ECEC and arguably also cultural attitudes about what is appropriate care for young children. Regulatory approaches determine the status and working conditions of care workers across different ECEC providers and therefore also impact the way different groups of providers are viewed as informal/formal and regulated/unregulated forms of ECEC. Cross-national comparison reveals that the qualification requirements of different forms of ECEC are not consistent across or within countries. In many cases there is no direct link between the regulation of services and eligibility to financial assistance for families. In-home child care varies in how it is regulated and funded in contrasting and inconsistent ways. Examination of migration policy for care workers reveals further divergences across the countries, with Australia, the UK and Canada having the least to most formal pathways, respectively, for recruiting in-home child care workers. However, the formality of migration policies for in-home child care workers does not correlate with the formality of these workers as regulated ECEC providers.

As mentioned in the Introduction there is little recent and reliable data about the families that use in-home child care; however qualitative research and analysis of policy

mechanisms indicates that patterns of ECEC use are reflective of socioeconomic status. The limited availability of regulated ECEC – evident to different extents in all three countries – pushes up the cost of all care types and therefore pushes out many low-income families. Low-income families must therefore look to informal and unregulated options. In Australia, there is evidence that the high-cost of long day care and family day care push many low-income families out of formal ECEC. The rising costs of child care in Australia is at the centre of policy and public debates about in-home child care; however because CCB and CCR are only available to users of approved services there is less incentive for families to rely on unregulated care as their primary ECEC. The targeted In Home Care program, in combination with access to the Special Child Care Benefit, offers a unique and valuable option for disadvantaged families, but does not meet the needs of all families who would benefit from this service.

In the United Kingdom (England), the child care element of the Working Tax Credit is targeted to very low income levels such that middle-income families cannot access assistance with the costs of ECEC unless they have employer sponsored childcare vouchers. The eligibility and generosity of the subsidies are the same for users of mainstream providers (nurseries and childminders) and families who use an Ofsted registered nanny. However, families not eligible for working tax credits or childcare vouchers have little incentive to hire a registered nanny. Instead, there is demand for more affordable and flexible informal options, heightened by the influx of migrant workers from the EU. Lloyd notes how the expanded investment through the tax credits and other initiatives under the Childcare Strategy in 1997 "ignored the implications for poor children…[it] prioritised the economic benefits of women's labour market participation over the redistribute function" of ECEC (Lloyd, 2008, p. 483). This is discussed in relation to in-home child care in the next chapter.

In Canada, the UCCB and CCED are not linked to regulatory approval and therefore families using informal and unregulated care arrangements can access financial assistance similar to most families using regulated centre- and home-based ECEC. However, it should be remembered that there are a limited number of provincially subsidised places for low-income families in Ontario. Centre-based care is therefore used mostly by low-income families with access to subsidies and high-income families

able to bear the market price. Unlicensed home-based care in the home of the care provider is an attractive option for many families who are not eligible or who cannot access a licensed centre- or home-based place. In-home child care, on the other hand, is the default option for many middle- and high-income families. It is also an alternative for families when there is no availability in centre-based settings. There is evidently a large proportion of families across all income levels using low-quality, unregulated care in Ontario and Canada.

Overall, the intersection of migration policy, in addition to regulation and funding, has implications for the availability, affordability and quality of different ECEC options. These factors also contribute to policy outcomes that are experienced differently across socioeconomic groups. Later chapters explore these policy intersections in relation to issues of gender, class and race for both families and in-home child care workers.

Chapter 6 : Social investment and its rationales for in-home child care

High quality early childhood education and care is promoted by governments and advocates as a worthy investment in children's development and educational outcomes. It is also promoted as a way to facilitate mothers' participation in paid work, training and study. As discussed in Chapter 4, the drivers for ECEC shifted in the 1980s and 1990s from seeking to reconcile women's paid work toward an economic agenda driven by the benefits of women's participation in the labour market and the reduction of child poverty. This new focus in Australia, the UK and Canada aligns with liberal ideas that promote individualism and labour market policies, opposed to welfare programs that protect individuals from the market.

As discussed in Chapter 2, a liberal social investment approach is designed to achieve a variety of objectives that centre on human capital, including education and skills development and active labour market policy to support a productive economy. The focus on human capital emphasises the earning capacity of all workers in the knowledge economy (including mothers with young children); the potential for low-skilled workers to up-skill and find paid work; and also the benefits of early education for children's development and future productivity. These three priorities and policy areas are relevant to the development of in-home child care. In particular, family cash benefits, child care vouchers and subsidies and tax measures are designed to promote individual choice for service users, or consumers, through the use of market mechanisms. These mechanisms are often rationalised as policy approaches that offer families' choice in using formal or informal care arrangements. These mechanisms are designed to provide assistance to parents with the costs of care in order to help reconcile work and care responsibilities, but often ignore the implications for quality ECEC for children and the working conditions for care workers.

This chapter examines different interpretations and objectives of in-home child care in Australia, the UK and Canada, and the ways in which these diverging interpretations are reflected in the policy mechanisms of ECEC that facilitate, or do not facilitate, different forms of regulated and unregulated in-home child care. Particular attention is given to the role of social investment in these three countries to analyse how and why discursive support for in-home child care differs. First, the chapter expands on the concept of

social investment, introduced in Chapter 2. Next, the discussion of policy developments in the 1990s and 2000s in each country illustrates how rationales and support for different forms of care are portrayed in policy documents and debate in each country, and how they shifted in response to the restructuring of care responsibilities. This builds on the discussion in Chapter 4 of the origins of in-home child care and identifies how the new ideas in the 1980s and 1990s re-shaped rationales for supporting in-home child care. In doing so, it builds on Chapter 5's discussion of *how* policy differs to provide insight into *why* policy differs. The final section discusses tensions and contradictions across and within countries in relation to four dichotomies: children's education and mothers' employment; workforce activation and choice; public investment and accountability; and working mothers and care workers.

The chapter puts forward two main arguments: i) Government support for in-home child care rests on a range of social investment rationales; and ii) In-home child care is underpinned by common rationales that operate very differently in practice. The analysis draws on primary and secondary sources to analyse how policy ideas and frames (presented in Chapter 2) are interpreted and adopted differently in Australia, the UK and Canada. Secondary analysis, including policy documents and some media commentary are used to compare countries' rhetorical support for in-home child care. Data from stakeholder interviews are used to inform the analysis and provide examples of the key differences in the ideas and rationales surrounding in-home child care, and ECEC more broadly, across these three liberal countries. This chapter therefore aims to illuminate the tensions and competing discourses between government's ECEC policy mechanisms (Chapter 5), and the rationales underpinning government's support for different in-home child care arrangements as identified in government policy documents and interviews with key stakeholders in the sector.

Background and analytical approach

As introduced in Chapter 2, the 'social investment' approach to social policy identified by scholars in the 1990s is explained as a shift from policies aimed to protect individuals from the market through social protection toward 'productive welfare', reflected in active welfare measures, and a focus on skills, labour force participation and early education (Esping-Andersen, 2002; Morel et al., 2012). Scholars illustrate how

this shift to 'social investment' emphasises an economic frame that promotes women's participation in the labour market (Orloff & Palier, 2009; Williams, 2012a). A social investment frame therefore adopts a productive view of women and children, which recognises non-parental care as a facilitator of women's employment and children's 'education' as investments in future human capital (Dobrowolsky, 2002; Esping-Andersen, 2002; Jenson, 2008; Lister, 2004).

This frame contrasts with feminist views of gender equality in all three countries in the 1970s and 1980s, when child care subsidies were intended to reconcile employed parents work and care needs – rather than as an activation requirement (Brennan, 1998, p. 171; Phillips & Mahon, 2002; Randall, 1996, p. 180). Governments recognised (although sometimes reluctantly) that some mothers needed to seek employment and therefore developed programs to address these challenges. These policies also responded to feminist demands for programs to support women's choice to enter the labour market as part of a gender equality rationale. Subsequently, albeit at different times in each country, the adoption of a social investment approach shifted rationales for support for ECEC from one that recognised mothers' right or duty to care for young children to one that emphasised their responsibility to participate in the productive economy – often without recognising children's right to high quality care. Support for care is therefore targeted to families in the name of addressing child poverty through workforce participation, while support for early education recognises the economic benefits of investing in children when they're young.

As discussed in Chapter 2, the underlying rationale for government support for ECEC has implications for policy design – particularly whether it is focused on mothers or children. If ECEC is solely framed as meeting developmental needs for the child the response would be universal care part-day and if framed around child poverty there would be a mix of educational and social services targeted toward low-income, and other vulnerable children (Mahon, 2010b, p. 203). When ECEC rests only on a mothers' workforce participation rationale "babysitting and unregulated care may be considered sufficient" (Jenson, 2008, p. 366). In ECEC literature, Australia, the UK and Canada are often grouped together for their 'human capital' approach to social investment; however

the extent and nature of the human capital approach to ECEC varies in these three countries.

As discussed in Chapter 2, human capital approaches to social investment are criticised for placing the needs of some women and children lower on the policy agenda (Dobrowolsky & Jenson, 2004; Jenson, 2009; Lewis & Campbell, 2008; Lister, 2006, 2008; Williams, 2009). For example, while the World Bank's support for targeted programs is less relevant to developed liberal countries, it does show how a narrow social investment approach focused on human capital can be applied worldwide:

> The World Bank's social investment discourse holds to the original neo-liberal thrust…while conceding a role for the 'right kind' of social policy, which sees social investment in a much narrower way than the OECD (Mahon, 2010a, p. 179)

The World Bank promotes non-formal, community based programs and public-private partnerships, where a "preference for such community-based solutions builds on, and contributes to, the expanding informal labour market". However, Mahon argues these programs "not only fail to provide genuine ECEC, they also do not offer local women the kind of employment opportunities they hoped for" (Mahon, 2010a, p. 181). This approach is contrasted with a more holistic view that promotes universal, high-quality care. More holistic social investment approaches can and should "extend beyond the argument regarding economic returns on investment" to consider the quality of the programs and the impact on low-paid women performing the services (White, 2011b, p. 303).

Across regime types, common rationales and objectives for ECEC are identified as part of social investment policies; however the relative priority of these objectives varies across regimes. The child development focal point influenced a degree of convergence toward social investment between neo-liberal countries (Canada and Australia) and Nordic countries (Finland and Sweden). However, increased emphasis on social investment in children – as an investment in human capital in neo-liberal states compared to children's rights in Nordic states – reduces claims for gender equality. The variation in policy approaches adopted by these countries aligns with diverging discourses in the OECD identified in the *Babies and Bosses* and *Starting Strong* reports

(Mahon, 2010a). *Babies and Bosses* accepted the need for public support for non-parental child care but demand-side subsidies were preferred, regulated by 'quality assurance' programs and "backed by the discipline of market forces" (p. 184). Liberal countries adopted the *Bosses* recommendations, favouring demand-side funding (Penn, 2007, p. 193), opposed to Nordic countries' commitment to a model closer to *Starting Strong's* vision of a publicly funded, universal system that delivers high-quality services. That is, human capital objectives to address child poverty, mothers' employment and early education are central to liberal welfare regimes, while Nordic countries have tended to extend their objectives for ECEC to child wellbeing and gender equality.

Informed by literature (presented here and in Chapter 2) (Jenson, 2004, 2008; Lister, 2008; Mahon, 2009b; Morgan, 2009; Penn, 2011) the five rationales presented below represent the most common reasons for investing in early childhood education and care. These rationales are drawn on to analyse and compare the tensions and inconsistencies between governments' stated rationales for in-home child care and broader care and education objectives. They also provide a framework for considering the potential contradictions between rationales and policy mechanisms governments use to support ECEC. The objectives are not mutually exclusive, and are not intended to be an exhaustive account of literature on ECEC rationales. They represent the most common set of objectives for investing in ECEC, and have received scholarly attention in this context (Dobrowolsky, 2002; Dobrowolsky & Jenson, 2005; Esping-Andersen, 2002; Jenson, 2008; Lister, 2004, 2008; Mahon, 2010a; Peng, 2011; Penn, 2011; Prentice, 2009; Williams, 2012a).

- *Child poverty* rationales are based on longitudinal research findings showing the importance of early intervention services, and the short- and long-term benefits to children in the form of higher educational attainment, decreased school drop-out and crime rates, and higher employment. Focused on disadvantaged, or 'poor' children, the child poverty objective argues that ECEC provides children with a 'head start'. A child poverty objective usually promotes a targeted approach to services.

- *Workforce participation* rationales have, in the past, been part of claims for gender equality. More recent workforce participation rationales emphasise a human capital approach which supports activation measures to move individuals into paid employment. Paid employment is seen as an economic benefit for families in the form of financial independence, cost savings to government, and a contribution to the wider community and economy. A workforce participation rationale is closely linked to the alleviation of child poverty, as parental employment is viewed as a solution to children living in disadvantaged families.

- *Child development and early learning* rationales are supported by research showing that children who attend high-quality child care and early education programs have better cognitive and socio-emotional outcomes. This rationale supports the developmental benefits for all children; however children from disadvantaged backgrounds are identified as benefiting more than children from middle- and higher-socioeconomic backgrounds.

- *Rights and child wellbeing* rationales focus on the well-being and citizenship of the child and draw on legal requirements established by the UN Convention on the Rights of the Child. This rationale emphasises the benefits of ECEC for children in the present, opposed to other child-centric rationales focused on their future outcomes and returns. It is closely linked to research supporting the holistic view of the child, and which supports children as important participants in research on child wellbeing.

- *Gender equality* rationales draws on feminist literature that calls for equal opportunity for men and women, with respect to both employment opportunities and caring responsibilities. Second wave feminism and the women's movement's demanded child care as a means to social justice that exemplifies a more holistic notion of gender equality. It is argued that few countries' ECEC policies currently rest on this rationale.

While all of the rationales listed above are evident in different social investment approaches, there is wide variation in the objectives and policy mechanisms that result. Even amongst the human capital rationales – child poverty, early education and women's employment – different policy measures can be promoted. Under a rationale

159

to decrease child poverty there may be targeted initiatives for vulnerable children, sometimes in combination with the promotion of women's workforce participation, for example when programs are part-time. At the same time, early education aligns with a human capital rationale, but does not necessarily facilitate mothers' workforce participation. What is missing from this list of social investment objectives is the promotion of employment for low-skilled workers, who are often from vulnerable and marginalised groups of the population. However, in relation to ECEC and in-home child care in particular, low-skilled employment is implicitly linked to government policy that promotes mothers' employment in the knowledge economy. That is, when market mechanisms facilitate users' individual choice to hire in-home child care workers, the hiring of low-skilled workers in the, largely, informal market is also supported. The promotion of a low-skilled care workforce is rarely recognised as part of the social investment approach to ECEC, yet is critical to reconciling the work and care demands of mothers with care responsibilities (Morel, 2012; Williams, 2012a).

Liberal ideas and rationales: Social investment and in-home child care
Governments in Australia, the UK and Canada use distinctive policy mechanisms to support in-home child care. As Chapter 5 discussed, in Australia, regulated in-home child care (In Home Care) is an approved and targeted program that is delivered through provider organisations, including family day care schemes. In the UK, formal care by nannies is separate to other forms of ECEC, such as childminders and nurseries, but still falls within the responsibilities of the same regulatory body, Ofsted. And, in Canada, in-home child care sits separate from the formal ECEC sector, comprising of centre-based daycare and group-based home child care in the provider's home.

The rich body of literature (referred to above and in Chapter 2) illustrates how social investment has shifted the place of ECEC on government policy agendas in Canada, the UK and, to a lesser extent, Australia. In many ways, social investment ideas have moved ECEC from a peripheral to central place on these government's policy agendas. However, as presented in Chapter 2, limited research is given to how a social investment frame has restructured support for different forms of ECEC, including informal and in-home child care. Drawing on policy documents, media sources and interviews with stakeholders this section draws on ideas associated with a social

investment approach to social policy to compare and contrast the rationales behind government involvement in in-home child care in each country.

Australia

ECEC before In Home Care

As early as the late 1980s, the term 'social investment' was used in Australia by scholars writing about child care as a way to distinguish a shift from previous beliefs about the benefits of ECEC for individual children toward a recognition that there were wider social benefits – for mothers, the workforce and the community – to public expenditure in high quality child care (Brennan & O'Donnell, 1986, p. 145). This marked a shift from previous debates regarding the preferred child care setting, which were based around affordability and notions of 'appropriate' care settings for young children (Brennan & O'Donnell, 1986; Jones, 1987; Petrie, 1991). Throughout the 1970s and 1980s the federal government's rationale for subsidising child care was to address the growing *necessity* for work-related child care needs; while 'education' goals remained the responsibility of the states. As mentioned in Chapter 4, in 1988, following a report from the Centre for Economic Policy Research highlighting the economic benefits of high quality, work-related child care, the Labor Government announced a National Child Care Strategy that would meet all demand for work-related child care by 1990 (Brennan, 2002, p. 103).

Through the 1990s and 2000s child-centric rationales to address child poverty also emerged, resting on international research showing the future cost-savings that would result from investing in young children. As one representative from a peak organisation noted "if we can put that [investment] in within the first initial years of their life we know that the older they get the less crime, the less damage, the less drug [use]" (Peak organisation, Australia-02). Scholars' analyses of shifting policy objectives illustrate how policy mechanisms expanded work-related child care, together with targeted programs aimed to address the needs of at-risk children (Baker & Tippin, 1998; Brennan, 2002; Hayden, 1997; Sumsion, 2006b). While In Home Care remains a "speck in the ocean" (Peak organisation, Australia-04) compared to 'mainstream', centre-based services, it is important to consider the pressures and rationales behind the development of the In Home Care scheme.

In Home Care originated in the late 1990s, around the same time that a 'social investment' discourse was becoming prominent across the other liberal welfare states. Although an explicit discourse is not identified in the late 1990s in Australia, the Howard Government shifted spending to 'special needs child care' (Hill, 2006; Lee & Strachan, 1998), which focused spending on targeted programs to address the needs of at-risk children and families. The Stronger Families and Communities Strategy introduced more parenting support for vulnerable and disadvantaged children, rationalised as a means to address child poverty. One of these programs was In Home Care.

Origins and pressures for IHC: 1999 to 2007

The In Home Care program in Australia evolved over a number of years "as ministers and departments became aware of families…unable to access mainstream services". During this time the provision of In Home Care required Ministerial approval which was given only "in exceptional circumstances" (RPR Consulting, 2005, p. 2). In June 1999, responsibility for streamlining the service was given to the Department (FaCS) and, shortly after, the Family Day Care Handbook was amended to allow FDC workers to provide in home care to families in particular circumstances. The Family Day Care Council of Australia and the Australian Federation of Child Care Services were commissioned to research the needs of families working shift work and with sick children (RPR Consulting, 2005).

Findings from this research confirmed that there was an "additional need", which supported the introduction of the In Home Care pilot sites in Tasmania, Queensland and South Australia. In 2001, the initiative was formalised and rolled out nationally under the Stronger Families initiative and allowed FDC workers to provide care in the child's home under FDC approval. When the program expanded, additional eligibility criteria were added, including families with multiple (three or more) children under school age, and families living in rural and remote areas and other locations where there was no access to mainstream services. The criteria for accessing In Home Care were established to recognise that some children – because of child or family characteristics – face barriers to accessing mainstream services. As one government representative confirmed in an interview, in-home child care was "intended to be kind of the safety net [...] if

your circumstances are such that you can't get into a long day care centre or whatever then that was the last resort really" (Government representative, Australia-17).

It is not clear whether the scheme was intended to facilitate employment, or whether the program aimed to improve child and family wellbeing for at-risk and vulnerable families. Findings from a 2005 Evaluation undertaken on behalf of the federal Department of Families and Communities (FaCS) found that the "purposes and policy objectives of IHC have been difficult to ascertain" because, while (at the time of the evaluation) the IHC program was administered by the FaCS Child Care Branch, which aims to "provide access to quality childcare for children, families and communities", its funded objectives under the Stronger Families and Communities Strategy (SFCS) were to provide 'choice and flexibility in child care' in disadvantaged communities (RPR Consulting, 2005, p. x). The ambiguity in policy and discourse evident during the early years of the IHC scheme remain today.

Under the Howard Government, the Senate Inquiry into Balancing Work and Family (2005) revived debate about extending financial assistance to families using registered in-home child care outside the approved IHC program. The Committee's Report proposed that mainstream services (i.e. LDC) were not providing adequate child care and families were resorting to black market care because of the low rate of subsidisation under the registered scheme. The Committee recommended that extending assistance would remove incentives to use black market care, and argued this through the rhetoric of parental choice and workforce participation – which ignores the implications for children and care workers. These debates are explored in Chapter 7.

A new agenda for ECEC ... but what about In Home Care?

The Labor Government's '*Investing in the early years'* (2007) strategy was the first explicit use of a social investment discourse in ECEC in Australia. Stakeholders identified that since the implementation of the National Early Childhood Agenda the "rhetoric… [is] more cohesive...and there's a general agreement that early education is important" (Peak organisation, Australia-14). This increased focus on quality early education driven by a social investment rhetoric exposes contradictions with respect to whether the IHC program is expected to provide ongoing 'educational' programming,

163

or to provide temporary solutions to meet families' needs as laid out under initial objectives of the program in 2001. While the Early Childhood Agenda appears to take a holistic approach to children and family services for children 0 to 5 years, the details of the policy reveal a distinction between the purposes of different types of ECEC services. Regulations and rhetoric confirm the 'educational' focus of preschool and kindergarten and, as discussed in the previous chapter, the National Quality Framework applies to long day care, family day care and outside school hours care (OSHC), but not In Home Child Care. This further complicates the sector's understanding of the purpose of IHC.

For some stakeholders, IHC is viewed as a "vital" service to meet children's educational needs, particularly those in rural and remote areas "where the educators might live on the property" (Peak organisation, Australia-04). A government representative agreed that IHC should "provide [*sic*] quality care that includes some element of early learning [because] that's the government's child care agenda" (Government representative, Australia-17). Stakeholders also identified that parents' perceptions have changed; for families living in remote areas the purpose of IHC has shifted from "just going out and babysitting" to an understanding the "carers going out there are doing educational activities and their children are learning, etc. and actually getting them prepared for kindy and school" (Provider organisation, Australia-11). These different perspectives expressed by ECEC stakeholders, including those close to the IHC program, reflect the influence of a social investment approach to ECEC, particularly through the National Early Childhood Agenda and the emphasis on quality learning. However, for many stakeholders, In Home Care retains its original intention, that is to relieve families from non-standard working schedules and additional needs associated with having illness or disability in the family.

Pressures for flexible, after-hours ECEC resurfaced in the 2009 *Inquiry into child care*. Submissions proposed more flexible care in the name of parental choice and workforce participation, which were also raised in the 2005 Inquiry into Work and Family Balance. The 'nanny debate' was brought to the policy agenda in 2012 by the opposition Liberal/National party at the time. They announced their intention to explore options for the subsidisation of nannies and in-home child care if elected. The Coalition

Government discourse focuses on parents' choice and workforce opportunities, while the (previous) Labor Government emphasised the need to give parents' confidence that all care choices have minimum standards and "pretty basic features like police checks" (Karvelas, 2012). The previous Labor Government also acknowledged the need for more flexible options; however the approaches of the two parties differed. The Labor Government's Education Minister (at the time), Kate Ellis, acknowledged the challenges of families needing flexible child care and said the Labor Government "would work to clean up the nanny industry" to introduce minimum standards but that it "is a long road to regulate nannies" (Karvelas, 2012).

In office since September 2013, the Liberal/National Government announced a Productivity Commission inquiry to improve "our childcare system to enhance participation, to boost productivity" (ABC News, 2013). The Coalition proposition points to shifting employment patterns, drawing on a workforce participation rationale to draw support from, largely, middle-class working families, while Labor's previous remarks support the safety and wellbeing of children. The Liberal/National Party's statement about participation clearly refers to participation of mothers in the labour force (Australian Government, 2013), which is consistent with a neo-liberal approach to social investment. This approach differs from the premise under which In Home Care originated in 1999. Tensions and contradictions in this shift are summarised are the end of this chapter.

United Kingdom

Setting the scene: ECEC policy in the 1990s

The United Kingdom's 1997 Childcare Strategy adopted an explicit 'social investment' discourse, which placed children and families at the centre of New Labour reforms. The Childcare Strategy formed part of New Labour's 'new' approach to social policy, which emphasised skills development, education for young children, and the eradication of child poverty through parental employment and early intervention (Lloyd, 2008). Williams notes how the influence of neo-liberalism in the 1980s and 1990s "displaced voices arguing for social justice in care policies [for] for policies of cost-effectiveness, fiscal restraint and the development of the private sector in care provision" (2009, p. 4). While private sector involvement was encouraged in many sectors (such as healthcare,

employment and education), the increased public investment in early years services was a break from the past. As discussed in Chapter 4, the UK had traditionally left the provision of ECEC to the family and the private sector. Until 1997, there was a very clear separation in provision of care and education for young children. The Government took some responsibility for the provision of part-time education, however, as discussed in Chapter 4, responsibility for care was limited to disadvantaged children where parental employment was a necessity.

Two of Labour's flagship programs, Sure Start early intervention services and Neighbourhood Nurseries, offered education, care and parenting programs. The programs were based in the poorest neighbourhoods, but open to all families. At the same time, financial assistance to subsidise the costs of child care were introduced through the Working Tax Credit system. These new investments in ECEC were viewed as the linchpin to address a number of new social risks, including child poverty (Dobrowolsky, 2002; Jenson, 2008). The 1997 New Labour policy agenda emphasised investment in human capital, which reflected a "definite sort of understanding that if [government] invests money in the early years it will save us money later" (Peak organisation, UK-15). The rich body of literature on ECEC policy in the UK confirms these shifts and potential contradictions in ECEC discourse and policy since the late-1990s (Dobrowolsky & Jenson, 2005; Fawcett, Featherstone, & Goddard, 2004; Lister, 2006; Wincott, 2006). However, this research gives limited attention to how the 1997 Childcare Strategy opened up debate about the place of in-home child care and nannies, which, in policy, are supported through a workforce participation rationale. The announcement of the Home Childcare Approval scheme in 2004 was introduced after years of sector debates and consultation regarding the safeguarding of children in different forms of care. An examination of sector debate since the late 1990s identifies alternative rationales driving advocacy support for in-home child care, which did not match the ultimate implementation of 'light touch' regulation. Debate about nannies and in-home child care evolved around the same time that changes to immigration policy resulted in an influx of *au pair*s from Eastern European countries. These debates, and the relationship to immigration policy, are touched on below and explored further in later chapters.

Developing support for in-home child care

Shortly after announcing the 1997 National Childcare Strategy, the Government published a number of reports looking at funding and regulation of different forms of child care and early education. One of these, the 1998 Better Regulation Taskforce report, did not support the registration of nannies, stating it was the parents' responsibility to protect children (Better Regulation Task Force, 1998; Tweed, 2002b). According to a key academic informant, the Labour Government "ignored the situation of nannies" because it "did not want to touch…the enormous tradition in the UK" (Key informant, UK-04). Instead, the Labour government focused policy attention on services for more disadvantaged families, such as Sure Start, Neighbourhood Centres, and childminders. While it is difficult to estimate the number of families using in-home child care in the 1990s, previous studies confirm a resurgence in the hiring of nannies and other domestic labour through the 1980s and 1990s (Cox, 2000; Gregson & Lowe, 1994).

The 2002 consultation paper, 'Supporting home-based childcare' (Department for Education and Skills, 2002), recognised the challenges for working families and put forward the option for families to hire registered childminders as in-home child carers. However, this proposal did not open up a new scheme, but rather required nannies to register as 'childminders' to be eligible for subsidisation. The consultation document cited the need for affordable care for children with additional needs and the large proportion of families working non-traditional hours as the target groups for the proposal. The proposal states that home childcarers would be "professional childcarers, offering children safe, good quality care and providing them with play and learning opportunities that contribute to their development" (Department for Education and Skills, 2002, p. 8). The Home Childcare scheme piggybacked on existing childminder regulation, and was implemented in April 2003 to allow childminders (already registered with Ofsted) to voluntarily register to provide care in the child's home.

Following sector pressures and a government review into the costs and benefits of a nanny register (for nannies opposed to childminders), the Children and Families Minister, Catherine Ashton, announced the government would not introduce a nanny register or extend tax credits and vouchers to families using nannies, and stated the "job

of government was to encourage parents to use approved carers" (Tweed, 2003a). However, by 2004, a new consultation was announced by the recently appointed Minister, Margaret Hodge, to consider extension of financial support to families using forms of unregistered child care (Department for Education and Skills, 2004). The 2004 consultation document, 'Extending protection and broadening support', signalled a shift in focus from support for 'quality', regulated, in-home child care to 'light touch' regulation to facilitate families' choices. The document stated that the new scheme "does not attempt to intervene in or override a parent's judgement when they choose who cares for their child", but rather is intended "to help inform their choice…[and is] backed up by access to financial support to make it affordable" (Department for Education and Skills, 2004, p. 1).

The announcement of the Home Childcare Approval scheme in the 2004 Budget asserted that the government was not taking responsibility for safeguarding or ensuring minimum standards, instead the scheme was "designed to be non-intrusive and to leave responsibility firmly with parents for determining the nature and quality of the care" (Department for Education and Skills, 2004, n.p.), reflecting ambiguity in the role of government to regulate the quality of ECEC services and, at a minimum, ensure the safeguarding of children.

Concerns about the quality of care, particularly safeguarding for children, were raised shortly after the announcement. The head of the National Day Nurseries Association (NDNA) at the time stated,

> It is ironic that while childminders, nurseries, playgroups and out-of-school care are heavily regulated and inspected by Ofsted, a "light touch" register is thought to be sufficient for nannies working alone in the parents' home (Tweed, 2004).

Debates surrounding the introduction of financial support for families using in-home child care, referred to as nannies or Home Childcare in the UK, have been part of broader ECEC developments, namely the 1998 and 2004 Childcare Strategies. Government and sector advocates' push for registration of nannies danced around different social investment goals. Early initiatives appeared to be child-focused through commitment to ensuring home childcare was high quality; however the eventual

implementation of the scheme in 2004 – despite paying lip service to the notion of 'quality' – was largely parent focused, with objectives to increase the workforce participation through increasing options for affordable ECEC arrangements.

While nannies are a tradition embedded in the UK since the 19th century, the ultimate inclusion of nannies and in-home child care workers under the regulatory framework represented a shift in the UK's thinking about responsibility for *care*. Previously a private family matter, New Labour's focus on workforce participation as central to social investment opened up to new options for facilitating women's employment. This shifted care from a purely private matter to the public domain. At the same time, policy at the EU level simultaneously promoted mothers' employment in the formal labour market and facilitated the movement of migrant workers, and the hiring of *au pair*s, from Eastern Europe to the UK after 2004, many of whom sought employment as care workers in private homes. This aspect of nannies and in-home child care is explored in the next two chapters.

Nannies and a new agenda for the Early Years

Policy reforms and consultations since 2004 have opened up space for nanny associations to demand inclusion in the Early Years sector; however the competing government objectives of education and workforce participation have complicated the political space in which they operate. Since the introduction of the Home Childcare Approval Scheme in 2004 (now called Registered Home Childcare), the government has furthered their commitments to provide accessible, affordable and high quality ECEC, framed by social investment rationales reflected in 'Every Child Matters' (Department for Education (UK), 2003) and 'Supporting Families' (Department for Education & Department of Health, 2012).

While the voluntary 'light touch' registration process includes nannies under the government's workforce participation agenda, they are excluded from most discussion

about education and delivery of the early years curriculum (EYFS) and the free Early Years entitlement[28]. Policy developments in 2012 brought quality early education to the forefront with the Nutbrown review (Nutbrown, 2012) and introduction of the Early Years entitlement for 2 year olds. Both of these policy developments leave in-home child care out of the scope of sector consultation for improving education services for young children. At the end of 2012, representatives from the nanny sector joined forces to campaign for inclusion in "the early years workforce" (Nanny agencies, UK-08, UK-13), where they argue the critical role they play in children's early development.

While there is a general consensus among stakeholders in the nanny sector about minimum standards and safeguarding, some sector representatives expressed hesitation about the educational potential of nannies, stating that "when children are 3 or 4 they should go to preschool" (Nanny association, UK-08). For this group of stakeholders, the rationale expressed for government recognition of nannies rested on their belief that in-home child care should provide "care and education [for the] holistic development of that child" (Nanny agency & training organisation, UK-09). However, as will be discussed in the next section, this rhetoric is not matched with the appropriate policy mechanisms to ensure children are receiving high quality ECEC to meet these goals.

The subsidisation of nannies through childcare vouchers and tax credits remains part of government rationales for promoting parental employment and, as a government representative reported, in contrast to the "rationale for the free entitlement [which] is fundamentally an educational one and a child development one" (Government representative, UK-11). In the last decade, the opening up of the EU to Eastern Europe has further fostered the hiring of low-paid, and often untrained, migrant domestic workers or *au pair*s. This category of migrant workers changed through the 2004 and

---

[28] As mentioned in Chapter 5, the Early Years Free entitlement provides 15 hours of ECEC for 4- and 3-year olds (and a targeted group of 2-year olds). The entitlement can be taken in centre-based settings, and with some childminders (local variation). It cannot be taken with registered nannies.

2008 reforms, and creates further tensions with a social investment approach. These are touched on later in this chapter and detailed in Chapters 7 and 8.

Canada

Social risks and policy shifts

The 1997 Throne Speech[29] publicly articulated a social investment discourse for Canada, shifting from an emphasis from a 'family responsibility paradigm' to an 'investing in children paradigm' (Jenson, 2004). However, the Liberal Government's explicit announcement of a social investment approach was not the first time the federal Government promoted child care in economic terms. In the 1980s women's employment was promoted in terms of their economic contribution, rather than gender equality; and the national focus on child care emphasised child poverty and, later, child development (Timpson, 2001, pp. 97, 171). The 1984 Royal Commission on Equality in Employment (RCEE) promoted employment equality, but the report also emphasised the shift to the "productive potential" of women's employment. Despite the Liberal Government's early commitment in the Red Book to a national child care program, the eventual policy announcement in 1993 consisted of targeted child benefits and employment incentives to address child poverty and mothers' employment.

In 1995 the Canadian Health and Social Transfer (CHST) arrangements prioritised the needs of vulnerable children and families, in the name of child poverty. The National Children's Agenda (NCA) (1997) was an umbrella concept that incorporated the National Child Benefit's (NCB) and other child development initiatives (McKeen, 2007). Overall, the NCA represented a targeted approach to child wellbeing and development. The two goals of the NCB were: to reduce child poverty and to "promote attachment to the workforce by ensuring that families were always better off as a result of working" (Dobrowolsky & Jenson, 2004, p. 171). Reforms were implemented to

---

[29] A speech by prepared by the Prime Minister's office which outlines the priorities for Government for the upcoming session of parliament.

encourage a shift from passive to active policy measures for low-income families, which aimed to reduce child poverty through increasing women's workforce participation. Activation requirements for single parents made child care a necessity for these families, however the federal government made "no commitment to formalised, professionalised, or 'quality' oriented child care" (Hayden, 1997, p. 5). Concerns about the Liberal agenda centred on the fact that policy focused "solely on the needs of mothers in the labour force… [the Red Book] shifts child care away from child's needs and threatens quality" (Timpson, 2001, p. 189). As discussed below, the emphasis on women's employment was, in fact, evident through earlier tax measures and immigration schemes implemented in the 1970s and 1980s.

Canada's relatively higher female workforce participation rates (compared with Australia and the UK) particularly among mothers with young children, meant non-parental child care was a necessity for more families through the 1970s and 1980s. The Child Care Expense Deduction (CCED) implemented in 1972 and the Live-In Caregiver program in 1992 (formerly the Foreign Domestic Movement since 1981) were adopted as the federal government's makeshift solution to addressing the 'problem' of women's workforce participation. As noted before, the Child Care Expense Deduction enables working parents to deduct up to $7000 in child care expenses from their taxable income, regardless of whether the arrangements are regulated or unregulated.

Default child care: the Live-In Caregiver program

The Live-In Caregiver program (LCP) offers an avenue for migrant workers (primarily women) to settle permanently in Canada. The program requires caregivers to work in the home of their employer (family) for two years before permitting them to apply for permanent residency. Research and advocacy surrounding the Live-In Caregiver program has centred on global care chains, the rights of workers, citizenship and the inherent racial and gender inequalities of the LCP (Bakan & Stasiulis, 1994; Fudge, 2013; Hodge, 2006; Pratt, 1999). While scholars and media also acknowledge the program within the context of increasing women's employment and the shortage of affordable and regulated child care (Arat-Koç, 1989; Gilliland, 2012; LeBaron, 2010; Pratt, 2003), less attention has been given to the rationales behind government and

stakeholders support for in-home child care, particularly as a deliberate policy alternative to regulated centre-based ECEC.

By the time a social investment discourse emerged in Canada in the 1990s, the hiring of foreign domestic workers had "certainly provided one solution to the pressures" dual-income families faced in meeting "the demands of work and family" (Arat-Koç, 1989, p. 36). The Live-In Caregiver scheme diffused mounting pressures from women demanding work-related child care solutions, with a politician in 1992 declaring the "Domestic Workers program is an important part of the child care system in this country" (Minister Axworthy, In: Cho, 2013). The Live-In Caregiver program also aligned with the federal government's agenda to minimise spending. Over two decades later, the situation has barely changed, with many nanny agencies attributing demand for live-in caregivers to the lack of available regulated child care (Nanny agencies, Canada). This demand for work-related child care needs is reflected in steady growth of the LCP, and the doubling of number of migrant workers as part of the LCP who entered the country between 2007 and 2009 (Kelly et al., 2011). As one critic of the program states, "successive governments have resisted a national child care system" and so "the Live-In Caregiver program is a de-facto child care program but only for a certain class of women" (Sunera Thobani, In: Cho, 2013). As noted, these issues of gender, class and race are discussed further in Chapter 7.

Social investment in Ontario and Canada: the education/care divide

The Live-In Caregiver Program facilitates forms of cheap labour that align with conservative ideology for private home care and, at the same time, serves neo-liberal and social investment objectives to increase workforce participation. As Patricia Daenzer argued in 1997, referring the changes to the (then) Foreign Domestic Workers program in the 1970s, the "[e]conomic interests have been, and continue to be, the primary considerations that guided the opening up of the program to non-British and to non-white women" (Daenzer, 1997, p. 104). This rationale sits very separately to the emphasis since 1997 on the economic benefits of investing in children.

The previous federal Liberal government pushed for a national Early Learning and Childhood Framework, and the province of Ontario initiated reforms to improve the

quality of early learning and education across the province's regulated settings. Despite the ultimate demise of the national Early Learning and Childhood Framework in 2006, it is argued that the social investment discourse united stakeholders "by a confidence in good returns [...] from investing in children". This economic frame was identified as an 'investing-in-children paradigm' (Prentice, 2009, p. 690). New research and knowledge about child development (for example, Bertrand et al., 2007; McCain & Mustard, 1999) contributed to the provincial government and sector's shift to early education. ECEC sector stakeholders pointed to research on child development as a critical factor influencing the shift of ECEC services in the province of Ontario from the Ministry of Children and Youth to the Ministry of Education. Stakeholders indicated the shift to education "signals a philosophy that ... child care is an extension of …publicly funded education" (Key informant, Canada-10), which "really puts [child care] in that continuum of young learners" (Ontario government representative, Canada-11). Yet, federal policy does not align with this provincial rhetoric and provincial policy structures fail to extend opportunities for quality ECEC to younger children.

The provincial Governments' increasing emphasis on the educational role also influences families' perceptions of different types of ECEC, including in-home child care. For example, one local government representative believed "there's been a generational shift" where parents are choosing licensed child care over nannies and, while "it's costing them as much", it reflects their choice about the "value of education" (Local government, Canada-04). However, within the constraints of the child care market, many families cannot access a regulated, high quality space. As a result, it is suggested families hiring nannies are "looking for more child educators, versus the housekeeper component" (Nanny agency, Canada-15). In contrast, it is also evident that the embedded culture of nannies and the LCP mean that "a lot of people don't want a trained nanny" because they "want more help with the house" (Nanny agency, Canada-15).

At the federal level, the Conservative federal Government (who came to power in 2006) committed to targeted funding for disadvantaged children and a $1200 cash benefit (Universal Child Care Benefit) per child per year in the name of parental choice (Richardson et al., 2013; Thériault, 2006). At the same time, the CCED is justified for

its facilitation of mothers' employment for mothers who choose to work. As a representative from a peak organisation noted that the federal government's interest in increasing mothers' employment is not matched with appropriate attention to children, where "people need to go to work...but [we also need] to make sure that what's going on with kids is the right thing" (Peak organisation, Canada-05). A 2006 survey of Canadian attitudes about child care found that the majority believe that the Government has an important role in assisting families with child care. However, the perceived impact of Government support for child care was higher for workforce participation (87 per cent) than for the early learning and development of children (79 per cent) (Environics Research Group Limited, 2006).

The Live-In Caregiver Program is not explicitly described as part of the ECEC policy agenda for Ontario or Canada. However, advocates and critics of the program alike attribute the popularity of the "de facto" program to the lack of public responsibility for ECEC. Responding to critique of the program's long waitlist for permanent residency (among others), the Department of Immigration and Citizenship stated

> The Conservative government recognizes the contributions of live-in caregivers to Canadian families and our economy, and the immigration department will continue to ensure live-in caregivers are safe and protected (Mas, 2013).

There is no doubt that in-home child care fills a gap in demand by meeting some (middle-class) working parents' needs for flexible care. Magkaisa Centre, a group advocating for the protection and improved rights of migrant care workers, argue that "any initiative to create a national childcare program is not complete until the LCP is scrapped" (Rabble.ca, 2010). The role of such organisations to make claims for improved working conditions and recognition of care workers is discussed in Chapter 8.

Converging ideas and policy tensions

Liberal ideas about government responsibility for the care and education of young children are evident in the development of ECEC policy in all three study countries. As noted earlier, neo-liberal ideas are prominent in ECEC policy across most Western countries. Social investment is identified as a strand of liberal and neo-liberal thinking about the best way to spend public funds to reach government objectives. However, we

see from the discussion above that ideas of social investment are interpreted and adopted in different ways across countries and policy domains. The development and transformation of in-home child care is one policy area where these distinctions are clear.

Government support for in-home child care (presented in Chapter 5) developed and adapted as part of new approaches to social policy focused on women and children. Variations in policy in Australia, the UK and Canada are shaped by different notions of social investment. In all three countries since the late 1990s policy agendas have tended to emphasise investment in education and early development for young children and workforce participation for mothers. However, despite similar rationales – including workforce participation and early education – for government involvement in ECEC, the policy design differs in many ways. In particular, policy surrounding in-home child care is strikingly different, as discussed in the previous chapters. The remainder of this chapter discusses the tensions and inconsistencies surrounding each country's social investment approach and in-home child care policy in relation to four dichotomies.

Early education and activation of mothers' employment
The most obvious tension of the social investment discourse is the distinction between early education and mothers' employment. This is evident in all three countries in relation to rationales for in-home child care and also the policy mechanisms that support this type of care. This is consistent with the literature on ECEC more broadly presented earlier in this chapter (Dobrowolsky & Jenson, 2004; Jenson, 2008; Lister, 2006; Mahon, 2006a; Prentice, 2009). In Australia, rationales for the In Home Care program bounce around between workforce participation, improvement of child and family wellbeing, and the provision of education and developmental opportunities for children. In Home care was initially funded as part of the Stronger Families and Community Strategy, which targeted disadvantaged families' needing flexible child care solutions. However, the program is now administered by the Child Care Support Program, which aims to improve the quality and affordability of ECEC (RPR Consulting, 2005, p. 50). A government representative confirmed the tensions in the In Home Care program by stating

176

there are probably families using it, and using it for the wrong purpose like respite care [...] but at the end of the day you've got very vulnerable children and very vulnerable families who need care and who need support. So it's a very difficult issue (Government representative, Australia-17).

Tensions also exist with respect to the broader ECEC push for education, and confusion about the underlying intention for IHC. For example, there was broad consensus that in home carers are "not babysitters [a]nd they have a role in the early developmental years of the child" (Nanny agency, Australia-09), however another stakeholder argued that because of the unusual patterns of In Home Care, including when children are sleeping, there's "always going to be a struggle to have In Home Care fit an ECEC model" (Peak organisation, Australia-17).

With the shift in government in September 2013, advocacy groups' efforts to expand government support for in-home child care are focused on the need for flexible child care to meet the needs of parents working non-standard hours and shift work. While this is one of the criteria for eligibility to the In Home Care program, it was not the central aim when the program originated in the late 1990s. The new focus on flexibility aligns with the Liberal Government's focus on a flexible and productive economy (Australian Government, 2013). When Tony Abbott first proposed a review of child care before the election he said it was "part of the Coalition's plan for a stronger economy. A more flexible and responsive childcare system will lift workforce participation and is part of the Coalition's plan to deliver a strong and prosperous economy and a safe and secure Australia" (Quoted in Bryant, 2013). This statement clearly prioritises women's workforce participation over high quality ECEC for children, which was central to Labor's 2007 reforms.

Similar contradictions between care and education exist in the UK's promotion of in-home child care. The UK Early Years initiatives introduced in the late 1990s identified the need for 'high quality', child-centred services, yet the rationale for extending funding to Home Childcare was explicitly employment focused. The Early Years reforms during the 2000s emphasise standardised quality ECEC provision through the Early Years Foundation Stage and expansion of free early education through the Free Entitlement. While nanny associations and representatives have campaigned for

inclusion within the Early Years sector, there is inconsistency regarding the extent to which nannies should be required to fulfil an 'education' role. However, while many advocates demand improvement to the quality and safeguarding of in-home child care; a government representative made it clear that the purpose tax credits and childcare vouchers are clearly distinguished from early education objectives:

> the rationale for the free entitlement is fundamentally and educational one and a child development one…[whereas] the Working Tax Credit….it's very much the idea of encouraging parents back into the workforce (Government representative, UK-11)

The Canadian experience differs from Australia and the UK in the fact that there is little federal government attention to increase the quality and education focus of ECEC. Despite increased rhetoric around parents' expectation for 'education' and 'early learning', there is little support by the sector to improve the quality of in-home child care (particularly the Live-In Caregiver Program) to benefit the child. LCP is viewed as a complement to centre-based preschools and kindergarten that 3- and 4-year olds attend. Therefore, while the federal Government has claimed that the LCP is a key part of Canada's child care system, it does not meet the quality standards articulated by many stakeholders in the sector (Key informant, Canada-19; Provider organisation, Canada-02; Government representative, Canada-04; Key informant, Canada-17; Peak organisation, Canada-05). Ontario's (and other provinces) focus on education and child development is not consistent with the federal government's encouragement of unregulated ECEC. Efforts by provincial advocates to expand government responsibility for ECEC are focused on research and evidence about child outcomes; yet federal rhetoric is underpinned by parental choice and a validation that informal arrangements with relatives, friends and neighbours is the most appropriate. These tensions arguably are reflected in findings from a recent poll conducted by a national newspaper, which found that while the majority of the public believed child care was too expensive and not of high quality, less than half believed the government should increase their involvement in developing a national day care system (Globe and Mail, 2013).

Workforce activation and parent choice

Workforce activation, individual choice and the reduction of public service provision are all features of a liberal social investment approach to policy. In the area of in-home child care, these three features are often in tension. The social investment approach emphasises workforce participation and productivity, yet, to different extents in each country, governments at the same time suggest parents should have a choice about whether to stay at home or seek paid employment. In all three countries, the dominant workforce participation rationale is at odds with neo-liberal rhetoric of 'individual choice'. Low- and middle-income families increasingly rely on two incomes, yet quality ECEC arrangements are not always available or affordable. Informal child care, including in-home child care, is therefore presented by governments as a flexible way to meet the child care gap, and is promoted as a means to facilitate parental choice in their work and care arrangements. But, as will be discussed in the next chapter, the ability for families to make real choices is divided along income and class lines.

The rhetoric between workforce activation and parent choice is apparent in Australia; however there are fewer tensions than in the UK and Canada. This is partly because the current ECEC policy allows families to access means-tested subsidies for up to 24 hours per week, regardless of workforce participation. This means that parents' decision to have their child participate in ECEC is not dependent on their workforce participation. The Productivity Commission has recommended eliminating this positive feature of the CCB system, which would constrain parents' choices for their children's care and education by their own workforce participation.

In the UK, the tension between workforce participation and parental choice is evident (Lewis, 2008). The extension of tax credits and childcare vouchers in the early 2000s aligned with a social investment approach to facilitate workforce participation and decrease dependence on welfare payments. However, on the other hand it was in the name of individualism and parental 'choice', arguably a reflection of the government's uneasy move to involve itself in such traditionally private matters. Most of the UK's investments in the early years were instead directed to 'education' through the Free ECEC entitlement and early intervention through local community programs introduced

first as Sure Start as part of the Childcare Strategy in 1997. As one representative from a peak organisation suggested,

> So we have this conflict of interest where we economically force parents to work and as part of the drive behind the free entitlement, so we force parents to work to help, apparently, get them out of poverty and at the same time we give them less opportunity to interact with their very very young children (Peak organisation, UK-07)

These tensions are evident in Canada as well, where reforms introduced by the Liberal government in 1997 focused on child poverty and imposed workforce requirements to increase parents' workforce participation (Baker, 2000). The current approach under the Conservative federal government restricts government responsibility for ECEC to cash benefits (UCCB) in the name of 'choice' and tax measures (CCED) to offset child care costs for (middle- and high-income) working families. However, choice between work and care and between different ECEC arrangements is not a reality for the majority of families.

The tension between conditional payments and parental choice is most evident in Ontario, where the welfare program, OntarioWorks, requires eligible families to participate in work or training, yet makes no commitment to ensuring families have access to regulated ECEC. Instead, informal arrangements are promoted as a flexible option to meet irregular work hours. These are often the children who would benefit most for a high quality ECEC environment. Assistance with the costs of informal care is promoted as a way to support parents' choices, however in reality it forces parents to work and does not ensure adequate options for child care.

Public investment and accountability

Policy that activates parents' employment through rhetoric of 'choice' can ignite problems for fiscal accountability – another feature of a social investment discourse. Issues of accountability emerge when activation policies facilitate 'choice' by offering financial assistance to forms of informal care. In all three countries financial assistance is available to users of in-home child care, even where there is limited accountability (Canada and the UK), and the rules applied to in-home child care differ to other forms of subsidised child care services (UK and Australia). In Australia, approved ECEC services are eligible for Commonwealth subsidies (CCB and CCR). In Home Child Care

(as well as occasional care) sit outside the National Quality Framework, yet is still eligible for receipt of CCB and CCR. With regard to debate about extending subsidies to families who use nannies and in-home child care, there was concern from stakeholders that these care arrangements would be difficult to monitor. For example,

> Well one is about how you actually regulate and monitor what happens, it's taxpayers money so how do you actually ensure that's actually going to the right place (Peak organisation, Australia-15)

In the United Kingdom, there are similar concerns about public funding and monitoring of in-home child care. All families using Ofsted registered ECEC services are eligible for the child care element of the Working Tax Credit (if their incomes are below the cut-off) and childcare vouchers provided by (some) employers. However, the level of monitoring of the services and care workers is not consistent for all types of care. One representative from a well-established nanny agency pointed out that the current voluntary registration gives parents a false sense of quality (Nanny agency, UK-14; UK-08) because there is little monitoring or enforcement of the, already low, standards – a police check and first aid certificate.

The funding structure in Canada requires the least amount of accountability for funding through the Child Care Expense Deduction. What differs from the other two countries is that in-home child care is not the exception among publicly funded services. The CCED applies to all non-relative child care arrangements, regardless of whether they are regulated or unregulated[30].

Working mothers and care workers

Another tension exposed in the analysis of government ECEC policy is the mismatch between the promotion of mothers' workforce participation and investment in the care workforce. Families (including children and parents) are regularly identified in

---

[30] Additional financial assistance is available for a limited number of provincially subsidised licensed centre- and home-based spaces for low-income families.

discourse as valuable investments – children for their future productivity and mothers for the financial contribution to the economy. Care workers, including in-home child care workers, receive less attention in rhetoric and policy. In all three countries, a social investment approach promotes and funds child care as an enabler for parents' (especially mothers) participation in paid work. The Child Care Rebate (Australia), Working Tax Credit and childcare vouchers (UK), and Child Care Expense Deduction (Canada) are linked to parents' workforce participation. However, there has been less attention given to (and investment in) the ECEC and broader care workforce. With a focus on flexible forms of child care, this is particularly relevant for in-home child care workers.

When attention is given to the ECEC workforce, it tends to be limited to the centre-based workforce – even though other types of ECEC are approved for the same funding. For example, in Australia campaigns to improve the wages of ECEC workers often distinguish qualified long day care workers from generally less-qualified family day care workers. In the UK, the push for professional status and qualifications of ECEC teachers focuses on centre-based settings, and rarely extends to investment or recognition of forms of home-based care, including nannies and in-home child care. And, in Canada, there is a clear distinction in the province of Ontario between qualified Early Childhood Educators (through the Ontario College of ECEs) and untrained care workers. In-home child care, particularly nannies that are part of the Live-In Caregiver program are not viewed as potential investments for training or up-skilling. These groups of care workers, to different extents, are portrayed in public discourse as a way to facilitate mothers' contribution to the knowledge economy, and therefore the productivity of the country, yet as a group they are not viewed as worthy investments. Particularly in the UK and Canada, the line between care work and domestic work is blurred as in-home care workers are expected to take on tasks that once were part of (now) working mothers' unpaid work in the home. In some countries, the formalisation of such domestic and care work also contributes to governments' social investment approaches to increase employment rates and reduce expenditure on social assistance.

However, there is a trade-off in the promotion of both the knowledge economy and the care economy in the home. The primary focus on mothers' employment aligns with

government objectives to achieve equality in the workforce. This focus ignores the underlying gender imbalance between men and women in the home; the gender inequalities experienced by low-paid earners, including women performing paid (and unpaid) care work; and also the potential implications for the children receiving care. It is these issues that are examined in the final two chapters.

Chapter 7 : Intersecting policy and new inequalities

As early childhood education and care has become more prominent on policy agendas across the Western world, the scale and scope of advocacy and policy development has broadened. In addition to increased emphasis on mainstream services, namely regulated centre-based ECEC, in-home child care is also receiving attention from families, employers, sector advocates and policy makers as a valid form of publicly supported ECEC. ECEC is often analysed as a stand-alone policy, however other policy areas including migration and employment regulations are significant in some national contexts (Arat-Koç, 1989; Busch, 2013; Morgan, 2005; Williams, 2012b). Therefore the intersection of policy regimes – care, migration and employment – impact the type and availability of ECEC arrangements for families and the employment opportunities and working conditions of care workers in domestic settings (Busch, 2013; Cox, 2012; Williams, 2012b; Williams & Gavanas, 2008).

In response to increases in women's employment and longer and non-standard work hours, many families turn to more informal, flexible and individualised child care options. As discussed in previous chapters, cash transfers, tax measures and vouchers can also facilitate the hiring of in-home child care and other domestic workers. And, in some countries, migration policy facilitates the hiring of cheaper forms of migrant labour, which offers an affordable solution to meeting the 'care crisis' (Williams, 2011). The hiring of in-home child care and domestic workers can also serve government objectives to increase employment among low-skilled and vulnerable groups at risk of being on benefits. The introduction of migration policy as an area for ECEC analysis therefore contributes to research on in-home child care as a form of domestic work, and also to ECEC research about how governments support nannies and other forms of in-home child care through both care and migration policy.

This chapter compares how gender, income/class[31] and race/migration issues are ignored in policy in Australia, the UK and Canada. To do so, it examines the intersection of care and migration policy to illustrate the (sometimes unintended) consequences for families and care workers. Employment policy is considered in relation to the other two areas, but not as a stand-alone policy. It therefore considers regulations concerning i) in-home child care workers in relation to ECEC legislation and ii) regulations concerning domestic employment as part of immigration schemes/policy. The next chapter gives greater attention to employment by outlining the contracts and regulations binding employer-employee relationships. First, the discussion below outlines how this chapter relates to previous chapters and other research literatures.

The restructuring of care responsibilities – including the movement of care workers across borders – raises new questions about gender, class and race (Arat-Koç, 1989; Williams, 2010b). Social inequalities are central to comparative policy analysis, and scholars illustrate the complex relationship between issues of gender, class and race that result from different forms of public support for parental, informal and formal ECEC arrangements (Lewis, 1997; Orloff, 1993; Shaver, 2000). As discussed in the previous chapter, a social investment frame can open up opportunities for some groups and simultaneously close down opportunities for other groups to articulate their needs (Williams, 2009, 2012a). Consistent with Williams' analysis, policy restructuring in the ECEC domain has tended to address the inequalities of some social groups (namely working mothers) while, sometimes unintentionally, producing "new forms of inequality" that can have consequences for in-home child care workers (Williams, 2012a, p. 113). While much has been written on issues of access and affordability associated with market-led ECEC systems, the literature often ignores the controversial

---

[31] While it is acknowledged that there are differences between 'class' and 'income', for the purposes of this study 'class' and 'income' are merged for analytical purposes and differently within the context of the discussion. For example, 'class' is used more in the UK than in Australia.

space in which in-home child care exists within countries' ECEC sectors (but see Arat-Koç, 1989; Bakan & Stasiulis, 1994; Busch, 2013; Cox, 2006, Ch 4; Sipilä et al., 2010; Williams, 2008, 2012a; Williams & Gavanas, 2008). Williams points out, "parents find themselves seeking value for money in a low-paid care work sector" which can "have the effect of giving those with more resources greater choice as well as reducing the working conditions and pay of care workers" (Williams, 2012a, p. 112). The inconsistencies and tensions within the in-home child care sector are especially salient because, although the issue of in-home child care work does not often feature in public debate, it crosses contested spheres of informal/formal, regulated/unregulated and public/private domains (for example, see Gregson & Lowe, 1994; Lister et al., 2007; Stiell & England, 1997).

This chapter builds on findings from Chapters 5 and 6 and is separated into three parts. First, an analysis of the intersection between care and migration policy illustrates how emphasis on a single policy area has implications for intersecting issues of gender, income/class and race/migration. It aims to show how policy addressing inequalities experienced by one social group can, in practice, have negative implications for other social groups involved. Second, it outlines how the policy issues identified above are debated in different policy domains (care and migration) in each country, which often ignore other issues and groups of stakeholders. Third, the chapter argues that care culture not only shapes the policy design and discourse (in Chapters 5 and 6), it can also explain why issues of gender, class/income and race/migration are accepted or challenged. In each of the study countries, the problem is represented in different ways and arguably reflects different understandings of inequalities experienced by mothers, children and care workers.

Policy documents, including policy announcements, advocacy statements, and media releases are used to identify the key debates and social actors surrounding in-home child care in each country. Secondary analysis and data from the interviews conducted with key stakeholders across the three countries are used to support findings and provide examples of the key divergences in the debates and outcomes surrounding in-home childcare, and ECEC more broadly, across Australia, the UK and Canada.

Families vs. Care workers?

Care and migration policy both shape the supply and demand of in-home child care. This section presents the different ways funding and regulatory mechanisms affect issues of gender, class/income and race/migration for families and care workers. Issues of gender, class/income and race/migration cut across three groups involved – mothers, children and care workers. However, the gender, class/income and race/migration framework is used to identify the most salient issues for care users (families) and care providers (in-home child care workers). In this case, the data shows that gender and class/income are most significant for care users and the intersection of race/migration with existing gender and class/income inequalities are most relevant for care providers, particularly in the UK and Canada. The class/income inequalities that affect care users extend to parents and children. As noted in the Introduction, it is acknowledged that there are other potential implications for children, specifically how policy impacts the *quality* of the care provided. As the second part of this chapter shows, the *quality* of care is identified as an issue that deserves greater policy attention as the use of market mechanisms for the delivery of ECEC has impacts for the quality of care (as identified in Chapter 2). Analysis of the policy implications for the quality of care would involve a comprehensive analysis of process features of services delivery. As Chapter 3 detailed, the thesis focuses on structural level policy interactions. However, where salient, the structural policy features that have implications for the quality of care are noted, and revisited in the Conclusion chapter.

Gender

Gender is inherent in any policy analysis of care, including ECEC. As discussed in Chapter 2, care work is gendered as women's paid and unpaid care work continues to be undervalued and poorly recognised. Within this context, this section illustrates how in-home child care policy produces gender inequalities in relation to mothers and care workers. Care policy, in particular, is designed to help families (read mothers) reconcile their care and work responsibilities and therefore promotes gender equality in the workforce. At the same time, migration policy that allows families to hire domestic workers arguably allows women in the receiving countries greater employment opportunities. Some might argue that migration pathways provide opportunities for women from sending countries to find better paid work than in their home countries.

But, as discussed in this chapter, these care and migration policies create new inequalities for care workers and do not address gender inequalities between men and women in the home. The discussion below outlines how care and migration policy relates to gender inequalities for mothers and care workers in each country.

Australia's formal In Home Care scheme, implemented in 2001, was designed to assist families in certain circumstances to access regulated ECEC. The IHC program is part of broader support from the federal government to cover care-related costs associated with working outside the home. In relation to gender equality and work-care balance, the employment criteria are designed to assist families with precarious employment patterns, such as those working shifts and non-standard hours. It therefore allows many women in vulnerable situations to participate in employment and, at the same time, offers an affordable and adequate standard of care for their children. As Chapters 5 and 6 discussed, the current Coalition Government is considering extending support for in-home child care beyond the targeted In Home Care program, so that subsidies are available to families using in-home child care (nannies) not approved under the current system. The extension of subsidies to in-home child care can potentially benefit dual-earner and high-earning single mothers; however this would be at the expense of deeper class inequalities among low-paid women working in precarious (often female-dominated) employment. It also has implications for the value of care work performed by the care workers and further embeds gender inequalities. Referring to the formal ECEC workforce more broadly, one peak organisation explained how the low wages of ECEC workers

> enables [sic] women to participate in the labour force off the backs of another female workforce that is earning poverty wages and that is not sustainable and is completely unacceptable…have middle class women banging on about needing more child care, never mind the fact that the women looking after her children can't pay for her own, can't afford to live (Peak organisation, Australia-01)

Similar to Australia, care policy in the UK aims to open up opportunities and encourage mothers with young children to participate in the workforce. The tax credits and childcare vouchers do assist eligible parents with the cost of in-home child care, provided their nanny/carer is registered with Ofsted. The voluntary registration with

Ofsted crosses the boundary of care and work/employment policy in that it fails to protect (mostly female) care workers from the vulnerabilities of working in a low-paid and unprotected work sector. This, of course, can also have implications for the quality of care for children. Changes to migration policy in the UK also encourages the hiring of care workers into the informal, in-home care sector, which can act to push down wages within an already under-valued and gendered workforce (Busch, 2012, 2013).

In Canada, demands for equal opportunity for mothers to enter the workforce were central to the decision to introduce the Child Care Expense Deduction in 1972 and the Live-In Caregiver Program in 1992. The interaction of these care and migration policies, in addition to the relatively low minimum wage, prioritises professional women's contribution to the knowledge economy. This has implications for gender equality between men and women in the home and also the valuing of work done by lower-skilled and more vulnerable women, including migrant care workers. This is consistent with broader findings of Canadian social policy (Arat-Koç, 1989; Brickner & Straehle, 2010, p. 317), where policy making and policy discourse under neoliberalism "treats gender inequality as a problem solved for white Canadian women, and an ongoing…problem for immigrant and racialised women" (Arat-Koç, 2012, p. 7).

In all three countries, care policies for in-home child care are more focused on mothers' employment and their contribution to the economy than the achievement of gender equality at home. Australia's In Home Care scheme is the only program that gives some attention to the needs of vulnerable families. Migration policy, particularly in the UK and Canada, also contributes to the deepening of gender inequalities among unemployed and low-skilled women and those unable to reconcile work and care responsibilities. This section shows that the alleviation of time pressures and care responsibilities for some mothers through the subsidisation of in-home child care can in practice create new inequalities for other groups of working mothers and care workers. The extent to which policy addresses or embeds intersecting inequalities – namely income/class and race/migration – is discussed in the next two sections.

Class and income

ECEC, migration and work/employment policies also shape class and income stratification for both families (mothers and children) and care workers. Earlier chapters discussed the class-based patterns of home-based care (group and nanny care) in the UK and Canada, particularly in the way certain types of care were designed for certain groups of families. For example, in the UK there were class-based divisions across childminding and nannies, where poorer low-skilled women were more likely to provide care for a similar class of women. And, with in-home child care, wealthier families tended to hire young women from a similar class (Gregson & Lowe, 1994; Owen, 2003; Penn, 2009c; Vincent et al., 2008). Now, in the UK, a key informant suggests that lower-income families prefer to use nurseries than childminders, while for "middle class parents, home-based child care from a nanny or a relative is ideal for babies" (Key informant, UK-05). Policy reform and new frames for ECEC have arguably changed interaction between policy domains, and the intersection between gender, class and racial inequalities.

Despite greater cultural acceptance and preferences for more flexible options, evidence shows that full-time in-home child care is only a reality for middle- and high-income families. According to one Australian stakeholder, families "on lower salaries do find it acceptable to have a nanny [sic] it's not a social status thing anymore", but because of the cost it does "push it into that high income earning bracket" (Nanny agency, Australia-03). There was consensus among most stakeholders in the UK that nannies were still used mostly by middle- to upper-income families. As one representative suggested, "you still need to be earning quite a good salary to have a nanny because nannies' salaries are very competitive" (Nanny association, UK-06). Asked about the changing place of nannies as a child care arrangement, one representative agreed that nannies "are almost a parallel to the childminder position, but the reality is it's a fairly privileged position" (Peak organisation, UK-07). In the UK, it is noted that while more

middle-income families are accessing nannies now than even five years ago, they are still concentrated among wealthier areas and among higher-income families. A 2011 survey found that almost 75 per cent of families with nannies had incomes over £100,000 per year[32] (Nanny association, UK-06).

However, it should be noted that, in both Australia and the UK there is more demand for part-time nanny arrangements, or nannyshares for people who "aren't very high earners" (Nanny association, UK-06). So, while more average earners are seeking in-home child care, they can only afford a nanny part-time (Nanny association, AU-08). Similarly, 'nannyshares' are identified as "one of the best businesses […] for families that want a nanny but can't afford the costs" (Nanny agency, UK-02). Nannyshares are not as common a pattern in Canada, where Live-In Caregivers are only allowed to work for one family and are required under the immigration policy to work a minimum of 30 hours per week. It appears that for the most part, while nannies are more culturally accepted amongst middle-income families in all countries, full-time nannies are not accessible to the majority of families. In addition, the wealthier families are able to negotiate higher quality care, for example by hiring nannies with more experience and qualifications. There are some exceptions to this general trend, particularly through programs in Australia and the UK.

Australia's In Home Care program is perhaps the one exception in the three countries where care policy is designed to mitigate class/income inequalities in terms of families' access to in-home child care. The IHC program offers affordable in-home child care to families who otherwise would be unable to negotiate their work and care responsibilities. However, the targeted and capped design of the program means that many families who would benefit miss out. A 2005 evaluation of the IHC scheme found that the formal scheme is still unaffordable for many families eligible under the IHC criteria. Stakeholders with knowledge and experience delivering the IHC program argue

---

[32] 22% 100-150K, 19% 150-200K, 16% 300K or more, 10% 200-250K, 7% 250-30K

that the system must be changed to make it affordable for one-child families where there is an identified need, particularly a disability or family circumstances putting the child at-risk (RPR Consulting, 2005). Currently the service provider (including both FDC schemes and private organisations) determines the eligibility, as "they could be interpreting the eligibility and criteria more loosely or more strictly depending on their own personal point of view" (Government representative, Australia-17).

This Australian policy model is unique among the three countries in that in-home child care is targeted to families on the basis of need. Policy thus distinguishes between publicly supported 'in-home child care' and private nannies. Similar models of in-home child care have been adopted in parts of the UK, but not embedded in national policy. As mentioned in Chapter 5, @HomeChildcare is a provider organisation in England that employs Ofsted registered child care workers to go into the homes of (mostly low-income) families who need flexible, in-home child care. The founder was "interested in removing [cost] barriers and making it affordable and more accessible to just ordinary families…who couldn't find childcare for later in the evenings and early mornings" (Provider organisation, UK-12). Apart from such standalone service providers, the childcare elements of the Working Tax Credits and childcare vouchers reproduce existing class divisions amongst families using nannies. At the same time, migration policy has contributed to an influx in migrant workers willing to do the same job for lower wages, discussed further in the following section. Despite access to subsidisation through tax credits and vouchers, most families in the UK hiring nannies are still middle- and high-income earners. The traditional income disparities among users of in-home child care are contended by critics and confirmed by data[33]. And the care work is still undervalued, as the wages and working conditions of (largely) female workers are not increasing (Social Issues Research Centre, 2009). This issue is discussed in relation to issues of race in the next section.

---

[33] This information is provided from an interview with nanny representative and is based on data from 2011 Nannytax survey (http://www.nannytax.co.uk/wages-survey).

Class/income stratification in the use and provision of in-home child care is most apparent in Canada, and the issues identified are consistent with other research (Arat-Koç, 1989; Bakan & Stasiulis, 1997; Brickner & Straehle, 2010; Stiell & England, 1997). The federal government's limited involvement in funding and regulating ECEC, in addition to culturally embedded ideas about private responsibility for child care, means that the majority of families resort to unlicensed care in the provider's home (home-based care) and in-home child care. The Child Care Expense Deduction further embeds income inequalities among families (Harder, 2004), in contrast to subsidies that tend to redistribute public funds to the most disadvantaged. The limited number of provincially subsidised spaces in licenced services means many low- to middle-income families resort to unregulated, informal care. In Ontario, it is also suggested that licensed home-based child care is also stratified along class lines, where women from lower socioeconomic classes are deemed the solution to addressing the needs of a similar class of children and families (Key informant, Canada-17).

Middle- and high-income families, on the other hand, negotiate their options within a mixed market for child care. Outside of the LCP, a number of nanny agencies cater to the needs of wealthy families, with one representative stating they "only take the cream of the crop because [they're] trying to simulate what [their] clients want" (Nanny agency, Canada-01). This implies that only the wealthiest families can afford high quality care. Even advocates for high quality, universal care acknowledge that "if you can afford it then you can have a nanny who does the washing as well as mind the kids I guess that's what people of wealth do" (Key informant, Canada-10).

As discussed in Chapter 4, for more affluent women who choose to work, in-home child care is the default option. Daenzer explains that,

> Historically, middle-class women and affluent families have found the live-in arrangement of the domestic work program convenient to their life styles and needs. The increased advocacy against the subjugation of domestics heightened at a time when many middle-class women were quite dependent upon the program to support their own occupational and status mobility…Eliminating the live-in requirement would have been an affront to the privilege of middle-class women. Thus, the 1992 policy was also the state's public affirmation of the preservation of class privileges (Daenzer, 1997, p. 104).

Changes to the LCP over the past few years have, according to one agency, driven up the price of a nanny by about 32 per cent, which has "literally knocked out the middle-class, it's only the upper- and upper-middle class that can afford nannies" (Nanny agency, Canada-07). However, other stakeholders interviewed suggested nannies "aren't just a thing for the rich" (Nanny agency, Canada-13), but rather if you have more than two children "it makes sense for families" (Provider organisation, Canada-02). As one representative from a nanny agency observed,

> The problem with the lower-middle class is that with two parent workers finding daycare can be extremely expensive if they have two or more children. There's a shortage of daycare in Canada…and if you have two or more children it's more economical to have a nanny than to put your children in daycare (Nanny agency, Canada-07)

The inadequacy of the ECEC system in Canada (outside Quebec) therefore drives greater demand for migrant Live-In Caregivers. The lack of regulation for in-home child care in Canada also means there is no standard of care or monitoring of the wages and conditions of care workers. Most in-home care workers (outside the LCP) would likely be employed on low wages with little employment protection. The next section illustrates how both care policy and migration policy contribute to intersecting inequalities that cut across race/migration, particularly for care workers.

Race and migration

Race and ethnicity are often identified as a priority area in ECEC policy reform. In particular, targeted programs and funding tend to focus on marginalised children and families such as children from ethnic backgrounds and recent immigrants. Race and ethnicity are central to families' child care decisions (Vincent et al., 2008). ECEC and care policy less often address race and migration inequalities in relation to the care workforce. This analysis, however, focuses on how policies intersect and contribute to issues of race/migration for care workers, arguably the most salient issue for in-home child care and domestic work. As alluded to earlier in this chapter, care and migration policy in Australia stands out from the UK and Canada for its lack of support for the recruitment of low-paid, migrant domestic care workers (but see Meagher, 2000 for domestic work more broadly). While anecdotal evidence suggests there is a market for informal in-home child care, the lack of government facilitation mitigates the potential

exploitation of low-paid, migrant care workers. Whereas in the UK and Canada formal migration paths reinforce intersecting gender, class/income and race/migration issues that are inherent in the hiring of in-home child care and other domestic workers. Migration policy alone might not necessarily embed these issues; however European research finds that cash benefits, tax measures and vouchers contribute to this process (Morel, 2012).

In the UK migration from Eastern Europe reinforces intersecting gender, class and racial inequalities among migrant care workers. Data from tax surveys in the UK show that the majority of nannies are British-born[34]; however these figures do not account for the grey market driven by the increasing number of migrant care workers, or *au pair*s, from Eastern Europe (Busch, 2013; Williams & Gavanas, 2008). *Au pair*s are generally cheaper to employ than formal nannies because they live-in the household and are supposed to work a maximum of 25 hours per week. However, research confirms that many *au pair*s work longer hours for no or little pay (Busch, 2013; Cox, 2000; Williams & Gavanas, 2008). The lower wages and increased flexibility of work accepted by migrant care workers means that families increasingly seek value for money (Williams, 2008). As one stakeholder stated, migrant nannies "will do jobs that…British nannies won't do" (Nanny association, UK-09). The opening up of the EU in 2004 expanded the market for nannies in the UK and, with the removal of the *au pair* visa in 2008, migrant workers from the EU can work in the UK without a visa. However this arguably contributes to more informal arrangements and fewer protections than under an *au pair* visa (Busch, 2012).

The influx of migrant workers created complex classed and racial hierarchies among nannies (and those who previously might have identified as *au pair*s). For example, Busch argues that migrant women from the Eastern European countries (that joined the

---

[34] This information provided from interview with nanny representative based on data from 2011 Nannytax survey (http://www.nannytax.co.uk/wages-survey)

European Union in 2004) are often regarded as better value and preferable to British girls from a lower-socioeconomic class. With the influx of migrant care workers pushing wages down, one stakeholder explained a contrasting dynamic whereby local nannies search for opportunities in other countries: "with the EU opening up…a lot of nannies, British nannies, go abroad…Russia…huge amounts of money…Arabic countries…they want English as a mother tongue. So that's where the demand for [British nannies] is at the moment" (Nanny association, UK-08).

The impact of migration policy on race/migration inequality is also significant in Canada. In Canada, care and migration policy, and the relative informality of the domestic labour market, facilitate the hiring of migrant nannies (mostly Filipinos). The Live-In Caregiver program has embedded class divisions among families (discussed earlier) and racial hierarchies between care users and care providers. Racial hierarchies imposed through the Live-In Caregiver Program compound existing gendered and class inequalities associated with care work, particularly in the domestic sphere where (traditionally unpaid) work is undervalued. The LCP has been criticised for prioritising the employment of middle-class mothers at the expense of migrant care workers, which deepens class and racial dimensions of inequality (Arat-Koç, 1989, p. 53). As Arat-Koc argues in her recent work (2012),

> the gender inequalities of 'white' women have become invisible in Canadian discourse; however the 'problems' of immigrant women have become 'hyper-visible' along racial and class discourses (Arat-Koç, 2012).

Families who can afford a local nanny are considered "lucky", according to one nanny agency (Nanny agency, Canada-01). The rules of the Live-In Caregiver program require care workers to live with the family and "because the caregiver is so tied to the family they often get taken advantage of, doing extra housework and overtime" (Nanny agency, Canada-01). The structure of the Live-In Caregiver program effectively "subsidises[sic] the costs to families who resort to live-in domestic workers to meet their child care needs by ensuring that these workers remain overworked and underpaid" (Fudge, 1997, p. 140). Middle- and upper-class families are able to purchase child care and domestic services on the backs of lower-class and migrant women. Middle- and higher income families negotiate care in the private market where there is a 'race to the

bottom' for families to find the cheapest option, who are often migrant care workers. This is argued elsewhere in the context of the U.S. experience (see Duffy, 2005; Tronto, 2002).

By the early 2000s there were large numbers of migrants arriving to Canada to take up non-existent jobs, having been charged considerable amounts of money by employment agencies. One stakeholder suggested that, by 2004 people coming from China[35] were paying $10,000 to get an employer family and by 2006 about half the people "were paying money to get into the country, not to get that job" (Nanny agency, Canada-15). Reforms were implemented in 2008 to eliminate the ability for agencies to charge these fees, and to limit the number of migrants sponsoring family from the Philippines. Supporters of these reforms acknowledge "there's been so much abuse, but…it's not all agency abuse…it's agencies, employers, caregivers…". One representative from a nanny agency suggested that some agencies are in it for the money – through employer fees – but "if people just followed the guidelines" it has the potential to benefit families who really need in-home child care, such as nurses and doctors (Nanny agency, Canada-15).

Once Live-In Caregivers have been "released" (Nanny agency, Canada-16) from two years of living with a family[36] they are eligible to apply for permanent residency, which allows them to seek employment outside the sponsored family's home. However many care workers continue to work in domestic settings (child care or aged care) and "because they are so used to involving the housekeeping they don't mind doing that" (Nanny agency, Canada-01). The hierarchy among nannies is complicated because there

---

[35] Many migrants (mostly Filipino) entering Canada as part of the LCP spend a year (or more) in China or other Asian countries. They work for families in these countries to attain the minimum experience (1 year) or training (6 months) to make them eligible for the LCP. Agencies in China and Hong Kong work closely with agencies in Canada to recruit migrants for the LCP (CAN-07; CAN-15; CAN-16; CAN-17).

[36] They may be employed by two separate families, each for one year.

are segregated by both their nationality and migration status. Once they've gained permanent residency rights they no longer are required to live in the home, yet they still risk experiencing exploitation, particularly because many work for cash and are outside the immigration regulation. For example, one agency explains how for live-out nannies,

> if you make $300 a week and can still pay for your nanny, that doesn't matter, that doesn't matter to anybody. But if you're making $300 a week[…] through the Live-in Caregiver program there's requirements that need to be met and you wouldn't be able to hire a live-in caregiver (Nanny agency, Canada-16).

Apart from the Live-In Caregiver program, the lack of government involvement in ECEC funding and regulation has shaped racial/ethnic divisions among home-based care workers, particularly in Ontario. Licensed home-based Child Care in Ontario is predominantly delivered by migrant women living in low-socioeconomic areas, providing care to children of a similar background. This pattern was established in the 1980s when welfare programs were designed to encourage women living on social assistance to work as private home child carers to eliminate their dependence on welfare payments. As a long-time researcher in this area stated,

> [it's the] notion that you've got the regulated people living in really disadvantaged…circumstances […] because they're often new immigrants to the country…[T]hey're women whose professional occupations are not recognised here (Key informant, Canada-17)

This phenomenon of formalising care in the home to provide care and assist with domestic work is evident in a number of Western countries today. The availability of cash benefits, care vouchers and tax measures provide financial incentives for dual-earner middle-class families to hire in-home child care to help reconcile their employment and domestic responsibilities. When migration policy allows families to actively recruit care and domestic workers from other countries, the supply of affordable options increases and becomes a reality for more middle-class families with

time pressures (Morel, 2012). While these policies may help achieve women's (and governments') aspirations for workplace participation, new issues emerge for care workers – many of whom are low-skilled[37], vulnerable, migrant women. As the next section discusses, the compounding issues of gender, class and race that are compounded through care and migration policy are often ignored, or sidelined, in policy debate.

Inequality and in-home child care: Debates and issues

In Australia, the UK and Canada, liberal ideas and government social investment policies promote increased productivity through employment in the knowledge economy and investment in children's education. Social investment policies also promote the employment of low-skilled workers as a means to boost employment rates among less employable workers. In the case of in-home child care, the employment of domestic workers can achieve government objectives to reduce social assistance and, at the same time, facilitate the earning capacity of those very families they are employed by. In-home child care is therefore central to ECEC debates about promoting mothers' employment and also enhancing children's education and care. These debates also extend to migration policy and employment regulations relating to the hiring of domestic workers. In Australia, the UK and Canada debates about in-home child care are concentrated in different policy domains, where the problem, or needs of families and care workers, are conceptualised in different ways. These issues identified relate to issues of gender, income/class and race/migration that were identified in the discussion above. As noted earlier, the issues are sometimes linked to the broader need for regulation to enhance the quality of care for children and the employment conditions for care workers.

---

[37] Or their qualifications are not recognised in their new country.

199

Australia

Debates about in-home child care in Australia centre on ECEC policy. There are various perspectives across the ECEC sector and broader public about whether the formal In Home Care program should be extended to allow more (or all) families to receive government support for the use of in-home child care, including nannies. As discussed in the previous chapter, support for extension of the CCR rests on arguments that it will boost mothers' workforce participation and productivity. A recent content analysis of public responses to proposal the extend subsidies to nannies identified four main themes: the role of women, middle-class welfare, the role of nannies and the pressures of modern living (Garvis & Pendergast, 2013). Consistent with the findings discussed below, these authors illustrate the issues and debates surrounding nannies and in-home child care in Australia centre on class-based perceptions about who should receive government support for nannies, and child care more broadly, as well as greater need for flexible child care associated with long and non-standard work hours for families.

Government's involvement with subsidising and regulating nannies has received increasing policy and public attention in the last couple of years. In particular, as mentioned in Chapters 5 and 6, the 2014 Productivity Commission's inquiry into Childcare and Early Childhood Learning draft report recommends the extension of subsidies to currently unapproved forms of child care, including nannies. Sector groups advocating the extension of subsidies to in-home child care are debating the type and level of support families should receive, in addition to the requirements for nannies and in-home child care workers. There are a range of responses to the Productivity Commission, from minimal registration requirements (for example see Indonesia Institute, 2014) to standards consistent with the National Quality Framework (for example see Australian Nanny Association, 2014; Dial-An-Angel, 2014; National In-home Care Association, 2014).

Demands for government support for in-home child care are motivated by perceived and real inequalities, such as unequal access to affordable ECEC, as well as gender issues related to mothers' workforce participation and the value of their care work. Advocates for the expansion of subsidies to families using in-home child care argue the current system is unfair to families who need flexible care for non-standard employment and

also because it provides a higher level of financial assistance to families who chose formal ECEC services, such as long day care and family day care. Advocates for the expansion of subsidies also point out that many families are unable to access mainstream arrangements because demand for spaces is greater than the supply. Many also argue that government assistance for in-home child care would have benefits for the economy through additional tax revenue from working parents. According to the President of the Australian Nanny Association, assistance should be extended to users of in-home child because the "lack of childcare options is excluding a large group of people from the workforce and that is affecting the economy and productivity" (reported in Militec & Browne, 2013). The large group of people that are affected are those that, presumably, cannot access or afford mainstream services. Sussan Ley, Assistant Minister for Education in the Liberal/National Government states that the current

> government-supported in-home care is a niche product, mainly for disadvantaged families … What I want to see is an assessment (of) whether it should, or can, be expanded to complement mainstream childcare options for modern working parents (cited in Uren, 2013).

The group of 'modern working parents' is not detailed, however the implication is that the current program is inadequate because it is limited to disadvantaged families.

Those who oppose government support for nannies argue that, under the current system the extension of subsidies to all families using nannies would favour middle-class families. Instead, they argue, public funds should be directed to regulated services with qualified educators to benefit families at low ends of the income scale. The former Labor party's Minister for Early Education, Kate Ellis,

> [b]elieve[s] families should be free to choose whatever care works for their family, including nannies…[b]ut the current debate is around if taxpayers should be subsidising an unregulated form of care that is the most expensive form of child care and outside of the reach of a vast majority of Australian families (cited in Uren, 2013).

While it is not explicit, the upper and middle-class families are the exception to the 'vast majority of Australian families'. Advocates for expanding subsidies to in-home child care emphasise the need for flexible, after-hours ECEC to meet the needs of women who work these hours. The groups of families missing out from this flexible,

after-hours ECEC are identified as high-income professional and self-employed women with heavy workloads and responsibilities. Proponents suggest the lack of flexible options discourage women from re-entering the labour force when their children are young and therefore, they argue, negatively impacts women's employment opportunities and gender equality in the workplace (Australian Women Chamber of Commerce & Industry, 2013; Education Employment and Workplace Relations References Committee, 2009; Standing Committee on Family and Human Services, 2006). Other occupational groups with non-standard hours and shift work, such as police officers and nurses, are also identified; however these groups are covered (in principle) under the current approved In Home Care scheme. Submissions to the Productivity Commission on Childcare and Early Childhood Learning that support the extension of CCR to in-home child care tend to prioritise working mothers, yet it must be noted that many do also acknowledge the benefits to children by supporting the inclusion of In Home Care under the National Quality Framework (National In-home Care Association, 2014).

Opponents to the expansion of In Home Care, or subsidisation of other in-home child care arrangements, contend that the introduction of subsidies for in-home child care would favour higher-income women in dual-earner families, and offer few benefits for lower-paid working mothers requiring flexible ECEC. Some argue an extension of the IHC program to all families would likely drive up demand for this type of care and make high quality flexible care even less accessible to families with low-paid and precarious work patterns who currently benefit from the targeted In Home Care scheme. For example, one opponent argued that, "in practical terms what it means is people on high income who currently pay nannies will continue to be able to pay nannies…so really what that's going to do it it's just more stratification" (Provider organisation, Australia-01). Similar to the UK, there was also opposition from stakeholders who have concerns that the extension of subsidies to unregulated in-home child care could have implications for the quality of care provided to children and the working conditions and wages of care workers (Peak organisation, Australia-12; Peak organisation, Australia-13; Peak organisation, Australia-16).

Overall, debate about in-home child care centres on the potential for ECEC policy to reconcile families' (read mothers) paid work and care responsibilities. Proposals for reform (put forward in the 2005 and 2009 Senate Inquiries and submissions to the 2014 Productivity Commission in 2013-14) argue families should receive equal levels of financial support for centre-based and in-home child care. These arguments are underpinned by individual choice that situates users/families as consumers within the care market. These arguments emphasise the potential for care policy to facilitate mothers' workforce participation, opposed to regulation of the ECEC workforce that would prioritise the quality of care for children and the conditions of care workers.

United Kingdom

Debate in the UK regarding government involvement in the funding and regulation of nannies and in-home child care surfaced earlier than Australia, includes a broader advocacy base and focuses on different policy areas. Since New Labour increased government involvement in ECEC in 1997 representatives of the nanny sector have pushed for inclusion in funding and regulatory regimes that are part of the Early Years policy. Advocates in the 1980s and early 1990s lobbied to increase the regulation of nannies; however the issue did not gain much attention in public debate until New Labour expanded its commitment in ECEC more broadly.

As in Australia, equal access to employment is central to debates about the subsidisation of different forms of ECEC in the UK. While government subsidisation of preschool has traditionally supported 'education', childcare vouchers and tax credits for nurseries, childminders and, since 2004, registered Home Childcare (nannies) are designed to facilitate workforce participation among mothers. Employer organisations welcomed the 2013 announcement to the of Tax-Free Childcare (to replace the employer sponsored childcare vouchers in 2015), but also call for an increase to the tax free limit and the cap on the value of childcare vouchers (Gaunt, 2013; Morton, 2013). Recent commentary from the Voice Union (representing nannies) suggests that

> Although the tax-free childcare scheme still requires nannies and home childcarers to be part of the voluntary register, it will be interesting to see if this leads to an increase in the number of nannies seeking voluntary registration […] Our previous research indicates

that nannies would welcome formal registration as part of the validation of their profession (Morton, 2014).

What is distinct about debate in the UK, particularly in comparison with Australia, is the focus on the regulation of nannies, opposed to more generous financial assistance for families using nannies and in-home child care. This is partly due to the fact that tax credits and employer childcare vouchers are available to users of registered Home Childcare, but also arguably due to class-based debates surrounding the increase in middle-income families hiring nannies. This class-based debate is still part of the ECEC domain, but the emphasis is on workforce regulations, opposed to financial assistance for families. Advocates in the nanny sector argue that the regulation of nanny employment should be the primary goal advocated by nanny associations, with changes to financial assistance identified as a secondary concern.

Arguments for improving the regulation of nannies arguably stem from perceptions about class and race that are central to the division of types of care that families use. There is support from across the Early Years sector in the UK to extend regulations to nannies so that "the same rules should apply to everyone" (Key informant, UK-04). There was unequivocal support from the stakeholders interviewed that there should be basic protection for children in all ECEC settings, regardless of whether families receive financial assistance. Critique from the popular online source, NurseryWorld, suggests the "curious 'hands-off' attitude towards nanny employment as a private matter for parents is not necessarily doing nannies, let alone children, any favours" (NurseryWorld, 2009). Trends suggest that middle-income, dual earner families increasingly hire nannies (and *au pair*s) and, stakeholders argue, there should be greater public responsibility to ensure the quality of this type of care. It's suggested that the New Labour Government "ignored" the issue of nannies because of the perception they are only for the wealthy, and therefore not a priority for a 'socialist' government (Key informant, UK-04).

Some advocates call for greater government regulation because the traditional notion of nannies "only being for the rich" is not the reality anymore as increasing numbers of dual-earner, middle-class families need the flexibility that in-home child care provides. At the same time, other stakeholders maintained that the hiring of nannies was a private

matter, but that current regulation is insufficient to protect the safety of children. A campaign, called *Regulation Matters,* was initiated in 2012 by a group of organisations including nanny agencies, professional and training organisations, and a trade union. The aim of the campaign is to make the registration of nannies with Ofsted compulsory. The campaign is "a national movement calling for the registration of all childcarers in the UK in order to safeguard children, improve childcare standards and create consistency in the childcare industry" (Regulation Matters, 2013). The campaign's founder, Tricia Pritchard, is a long-time advocate for the improvement of standards to protect workers and provide safeguards for children and families. As Pritchard argues,

> they [workers in nurseries and childminders] have to be required to work to a specific standard and that they are subject to disciplinary procedures if they don't come up to those standards, why are we saying that children cared for in their own home don't deserve the same protection? Don't deserve the same high quality of care being provided? Why's that okay? (Nanny association, UK)

The Government's limited involvement is explained through class-based understandings of different types of care. For example, even a staunch supporter of nannies and market-based care indicated that "one of the frustrations in the UK…[is] the government doesn't like nannies, they think they're for middle-class people, so it's kind of like it looks after itself" (Nanny agency, UK-02). Instead, stakeholders argued, government prioritises funding and regulation to "other forms of care not used by the most well-off" (Key informant, UK-04), such as childminders and nurseries.

The debate about the regulation of nannies in the UK differs from Australia in that attention is also given to children and care workers, opposed to only mothers' employment. Registration of in-home child care is presented as a necessary step to improve the status of nannies and to recognise the value of their caring role in line with other Early Years workers. Lobbying for the recognition of in-home child care workers in this way links debates about in-home child care to workforce standards. In this way it fosters issues about hierarchies *among* the nanny workforce, and hierarchies between care workers and employers.

In the UK, debates about employment standards and the working condition of the in-home child care workforce are also shaped by recent changes to migration policy. There

has been an increase in the number of migrant domestic workers from Eastern Europe since the 1990s, which includes those caring for children, namely nannies and *au pair*s (Busch, 2012; Williams & Gavanas, 2008). Recent surveys suggest that, while the majority of nannies are British, a large proportion (approximately 15 per cent) are from Eastern European countries (Búriková & Miller, 2010). Migration from the EU in 2004 increased the number of people available for *au pair* placements without visas and the later abolition of the *au pair* visa in 2008 meant that anyone providing care for children in private homes could call themselves an *au pair* (Busch, 2013; Cox, 2012). For workers with full employment rights (not on a visa) there was no clear distinction between nannies, *au pair*s and other migrant domestic workers. Some policy definitions and scholars distinguish between trained 'nannies' and more informal *au pair*s; but there is an increasingly blurred line between the two. Despite increasing overlap in the tasks and responsibilities of nannies and *au pair*s, *au pair*s are generally paid less and therefore accessible to more middle-class families.

The increasing number of migrants entering the UK and willing to accept lower wages has raised concern within the nanny sector. Concerns about migrant domestic care workers are framed in various ways. Some groups worry that nannies are not being protected, and therefore "may be used and abused as housekeepers and nannies" (Peak organisation, UK-03). However, an opposite concern expressed by some nanny associations related to the importance of distinguishing professionally trained nannies from informal migrant care workers. For example, one stakeholder explained that Eastern Europeans enter the UK as *au pair*s, and as soon as they see the wages the local nannies are on they'll call themselves a nanny, "but they'll accept less than the experienced nanny, so it brings the wages down" (Nanny association, UK-08). This is perceived as a problem because wages for professional, trained nannies are pushed down as families seek value for money, sometimes employing unskilled[38] *au pair*s

---

[38] It should be noted that many domestic workers from Eastern Europe do have degrees from their home countries, including teaching and nursing.

willing to do the housework in addition to caring for children (Nanny associations, UK-08; UK-09). This combination of migrant vulnerabilities, racialised inequalities and misrecognition with exploitation and poor working conditions among in-home child care workers has been identified in scholarly research and advocacy work in the UK (Busch, 2013; Cox, 2006; Williams, 2008), particularly in relation to changing EU migration patterns.

Debates on in-home child care therefore respond to traditional class-based understandings of nannies to lobby for improved regulation of the nanny workforce in line with the broader Early Years sector. At the same time, migration policy and the opening up of the EU creates debates about the domestic care workforce, which draws on hierarchies among different types of in-home child care workers. These point to intersecting issues of gender, class and race/migration that are central to in-home child care policy in Canada.

Canada

Migration policy is the most significant area for debate about in-home child care in Canada. High women's labour force participation and preference for private responsibility for care leaves few child care options for families with young children. In Canada, the term 'nannies' is used interchangeably with 'migrant caregivers' to refer to migrants who enter under the Live-In Caregiver program. Supporters of the Live-In Caregiver program give little attention to the fact that publicly funded and regulated mainstream ECEC services do not meet the needs of many families using nannies. Instead, there is a greater complacency toward the trade-off between gender, class, and racial inequalities embedded in government policy and social attitudes since the 1970s.

Debate about funding and regulation of in-home child care *as a form of ECEC* is largely off the radar for advocates lobbying against the poor working conditions and violation of social rights for Live-In caregivers, including widespread complaint about the live-in requirement (Fudge, 2011, p. 248; Stiell & England, 1997). Academics have criticised the live-in requirement for over two decades. Daenzer, for example, contends that when the Live-In Caregiver program was introduced in 1992 (replacing the Foreign Domestic Movement) class inequalities were embedded (and accepted) as part of the program:

> Eliminating the live-in requirement would have been an affront to the privilege of middle-class women. Thus, the 1992 policy was also the state's public affirmation of the preservation of class privileges (Daenzer, 1997, p. 104).

The gender inequalities embedded in the program are, arguably, neglected by policy makers, who see the LCP solely as an immigration and labour issue (Brickner & Straehle, 2010, p. 310). The LCP is viewed by policymakers as a central component to the facilitation of mothers' labour force participation in the knowledge economy and, at the same time, attracts a low-paid labour force into the country. Supporters of the LCP justify its necessity as it offers flexible child care arrangements and a more affordable option for families with more than one child under school age. Supporters of the LCP also make claims that the scheme offers immigrant women a pathway to better employment and citizenship in Canada. The tensions between advocates and critics of the program centre on the rights of the caregiver, with little acknowledgement of its place within the ECEC sector.

Policy debate about the Live-In Caregiver program has been driven by stories of exploitation of these workers. Reforms to the program have sought to address the issues behind exploitation, including shifting responsibility for travel costs from the caregiver to the prospective employer. Debate about migration policy and the implications for care workers does not, however, cross over to debates in the ECEC sector and the impacts on children. Nanny agencies' concerns about "child care policy" centred on the rights and inequities amongst the employers (families), employees (migrant care workers), and agencies. Disagreements across Live-In Caregiver agencies (and other nanny agencies) highlighted the intersection between migration policy and employment regulations and the implications for caregivers, families and agencies. In particular, some stakeholders believed the 2008 reforms introduced particular risks for the employers and agencies (Nanny agency, Canada-07). When there is an oversupply of caregivers – resulting in many working in the grey market – it is argued by some stakeholders that families compete for the lowest paid workers and try to get as much 'value' for their money. Other agencies argue the current restrictions mean there are too few caregivers in the market, which allows caregivers to 'shop around' for new employers, and leaves families unable to retain good quality caregivers (Nanny agency,

Canada-15; Canada-13). These issues are very separate to debates about funding and regulation of the broader ECEC sector. Issues about the regulation of in-home child care workers (through the LCP) are not regarded as an issue that relates to ECEC funding and regulation.

There is therefore little attention given to the implications for the quality of ECEC service provision or the status and recognition of caregivers as part of the ECEC workforce. Despite recognition that the LCP does not meet the needs of lower income families, there is little advocacy to reform ECEC or broader care policy to assist these families. This is in contrast to the UK and Australia where in-home child care advocates and ECEC stakeholders believe ECEC policy should be designed to help families access in-home child care and to ensure the safety and wellbeing of children using this type of care. Critics of the LCP instead focus their efforts on increasing licensed, centre-based spaces for low-income and dual-earner working families, rather than restructuring in-home care options. This is arguably because it is seen as an immigration and labour market program, outside the realm of ECEC debate.

Compared to the UK and Australia, there is little support to improve in-home child care as a valid ECEC option for children and families. Recent comparative research has attributed the acceptance of the LCP and its inherent inequalities, to cultural attitudes and neo-liberal views about the division of public and private responsibilities (Arat-Koç, 1999; Michel & Peng, 2012), which is explored further in the final section.

Cultures of inequality?
This examination of care and migration policies compares and contrasts the implications for gender, class/income and race/migration issues for families and care workers. The debates play out differently in each country, directing varying attention to the inequalities experienced by working mothers, children and care workers. As indicated earlier in this chapter, these issues are situated within different historical and political contexts that shape, and are shaped by, individual, local and national assumptions about *who* should provide care and *how* care should be provided. When mothers are encouraged to participate in the workforce, it is assumed there is a non-parental alternative for child care. Governments support (or do not support) different forms of

care through ECEC funding and regulation, migration policy and rules and regulations about the hiring of care workers in different settings (which cuts across ECEC and migration policy). Debates about in-home child care cut across these different policy spheres and, to different extents in each country, actors lobby to improve options and the quality of care for children and families and also to improve the wages and conditions of care workers.

The first part of this chapter illustrated how care and migration policies create new gender and class inequalities in relation to families accessing in-home child care, and also create hierarchies among in-home child care workers across racial/migration lines, within an already gendered workforce. The second part of this chapter illustrated how debates about in-home child care are situated across care and migration policy in relation to the level and type of government involvement in the funding and regulation of in-home child care. Here, it is argued that the disconnect between intersecting care and migration policies and the policy debates can be explained by each country's care culture, or their different assumptions about who should care for young children, and differences in the embedded norms that link these policy structures to attitudes toward gender, class/income and race/migration inequalities. The current policy debates reflect the development of institutional structures over time, in addition to more recent policy initiatives that have shifted responsibility for ECEC into new domains. These shifts, it is argued, have reproduced and sometimes compounded existing inequalities among families and care workers. Cultural acceptance of these inequalities is therefore shaped by the institutional structures and embedded norms.

In Australia, in-home child care is neither an embedded ideal nor a default alternative for families, as it is in the UK and Canada, respectively. Unlike the UK and Canada, Australia has no formal migration policy to facilitate the use of in-home child care. The Working Holiday Program allows *au pair*s to work for families for 6 months, however such care is regarded as complementary (rather than an alternative) to formal ECEC, and largely as an experience for *au pair*s, not a service for families (Nanny agency, Australia-03). Australia's policy toward in-home child care currently exists as a targeted ECEC program that can alleviate disadvantage and facilitate opportunities for low-

income families. The formal In Home Care scheme addresses many of the traditional classed-divisions that exclude access to in-home child care.

While there is undoubtedly an informal, 'grey market' for in-home child care arrangements, unregulated care in the child's home is not supported by government through funding or migration schemes. The absence of such a policy protects against compounded issues of gender, class and race among care workers and also against the potential of poor quality care for children. Recent debate about the extension of public subsidies to users of in-home child care raises new issues about gender and class and potentially race, if new migration schemes for care workers were introduced. Advocates for the extension of subsidies to in-home child care frame the debate around the unequal treatment for parents who 'choose' in-home child care. Similar to the UK and Canada these discourses about 'choice' align with liberal ideas about individualism and a market-based model for ECEC in Australia. It also promotes the workforce participation of mothers. However, compared to the UK and Canada, policymakers and public attitudes have thus far resisted calls for care and migration policy that prioritise the demands of professional middle-class mothers over the needs of lower-income families and workers in the ECEC sector.

In-home child care policy in the UK reproduces a tiered system of ECEC for families and care workers. The perception of nannies in the UK is embedded in ideas of domestic service and class-based divisions between employers and employees. For the care of young children, governesses and trained nannies provided care to the wealthiest families as a status symbol – not because mothers participated in paid work. For example, one stakeholder commended there "is still this myth…that only the well to do and the rich and famous have nannies…so therefore, it's not something a government is ever going to be sympathetic towards" (Nanny association, UK-08). However, since the 1980s and 1990s, there has been a resurgence of nannies and in-home child care (especially *au pair*s) as mothers with young children entered the workforce, with few ECEC options for families, except for the most disadvantaged. The in-home child care sector – that before was "left well alone" (Key informant, UK-04) in the private sector – figured in public debates about government's role and responsibility in the lives of families and care workers. Since more middle-income families are using this form of

care, it is argued, the government should take greater responsibility for ensuring basic quality for children and working conditions for care workers, especially when mothers with young children are being encouraged to return to the workforce to contribute to the economy.

The ideal of the British nanny is underpinned by class-based divisions between public and private responsibility for care. As ECEC and migration policy shifted through the 1990s and 2000s the ideal of in-home child care arguably remains; but now rest in new racialised assumptions about care responsibilities. Cultural preference for in-home child care in combination with the existence of tax credits and vouchers for in-home child care validates this form of care and figures show that, while users are still concentrated in the upper class, families are increasingly interested in a part-time nanny and nannyshares. Nannies have become a more popular option (relative to centre-based care) for some middle-class families, with many stakeholders identifying nannies as 'the ideal'. The opening up of the EU expands the ECEC options for families seeking the ideal of flexible and affordable in-home child care, however it also poses new challenges as responsibility for the regulation of the quality of care for children and the protection of care workers sits across the private and public domains.

In Canada, financial assistance from the federal government supports any form of informal or formal care. In Canada the class-based divisions associated with users of in-home child care are culturally accepted. This acceptance is shaped by neo-liberal and neo-conservative views about the care of young children (Chapter 6) and embedded policies and practices for hiring migrant care workers. Daenzer argues that these intersecting inequalities have been pushed away as 'cultural' issues rather than addressing the underlying structural issues impacting gender inequalities among all women (Daenzer, 1997). The CCED was introduced to overcome gender inequalities associated with women's return to work after having children; which allowed mothers to return to well-paid jobs while women of lower-class and race looked after their children. The principles underpinning the introduction of the Live-In Caregiver program (then the Foreign Domestic Movement) are embedded in the broader public's attitudes about the benefits for middle-class working families and the assumptions that the LCP offers migrant women opportunities that are better than their home country. These

racialised hierarchies underpin assumptions about the value of care work, which in combination with the lack of public investment in ECEC, contributes to a care culture that promotes the hiring of in-home child care as a 'win-win' situation for the family and the migrant care worker.

These comparative findings help to deepen understandings of the diverging intersection of in-home child care subsidies and migration schemes. Access to affordable and high quality ECEC is stratified across class lines and, at the same time, care and migration policy shapes issues of gender, class and race for care workers. At the simplest level, care and migration policy determines whether and how care workers are included or excluded from the formal ECEC sector. The dominant debates and issues in relation to inequality are reflective of the way these care policies and migration rules intersect, but also reflect broader differences in care culture that shape understandings of appropriate forms of care and division of responsibilities across gender, class and racial lines. These findings have particular implications for the status and recognition of in-home child care workers and, ultimately, shape the value of high quality services designed to address inequalities among families and ECEC workers. Recognition for in-home child care workers varies by type of ECEC and also among (and within) countries. The recognition of in-home child care workers, and the ECEC sector more broadly, is therefore the focus of the next chapter.

Chapter 8 : Recognition of what? Visibility, voice and value of care workers

Background: Restructuring the ECEC workforce

As more women enter the labour force and require non-parental child care, there is greater demand for affordable and flexible ECEC. Policies to reconcile these work-care responsibilities not only impact the workforce participation of mothers; they also create new issues of gender, class and race and shape the status and recognition of in-home child care workers. Policy reforms create new issues and inequalities for families and care workers, which, in many ways are reflective of assumptions about the division of care responsibilities that cut across gender, class and racial lines. These embedded assumptions shape the way in-home child care workers and sector advocates respond to these issues and struggle for recognition, as citizens, care workers and care professionals.

As Chapter 6 argued, children's education and parents' (usually mothers') interests are central to recent ECEC policy objectives. With increasing interest in in-home child care, debate often fails to recognise the place of care workers and their relationship to their employer (in many cases the family receiving the care). This is not to suggest that no attention has been given to ECEC workers, as there is much in research literature and policy campaigns that emphasises the importance of up skilling ECEC, and other care, workers and improving their remuneration and working conditions (Meagher, 2007a; United Voice, 2012). There are, however, two main gaps in the policy focus on ECEC workers, which make in-home child care *workers* invisible in most debates about ECEC policy. First regulations for in-home child care workers tend to prioritise the protection of the child (however this is not necessarily the case in Canada), and not necessarily the wages and professional status of the care worker. Second, policy reforms have tended to segregate the ECEC workforce across certain types or settings of care. Attempts to unify the sector by implementing common sets of standards and qualifications have even been criticised by some scholars (Lyons, 2012).

As the previous chapter argued, hierarchies among in-home child care workers exist across class and racial divides are superimposed upon an already undervalued feminised workforce. Care and migration policies shape the types of care available to families, and

they also shape and create gendered, class and racial inequalities among the care workforce. Hierarchies among the ECEC workforce are prominent in all three study countries. However, the nature of these hierarchies varies in relation to ECEC and migration policy supporting in-home child care and broader sector regulation protecting the conditions of ECEC workers. Advocacy groups point to issues of gender, class and race/migration to lobby for greater recognition of in-home child care workers, as well as the broader ECEC workforce. These calls for recognition of in-home child care by the nanny industry and broader ECEC sector are reflective of the *types* of inequalities experienced by care workers, and the different cultural perceptions and acceptances of these inequalities. Meagher explains how collective struggles for recognition at the institutional level (meso-level) offers a strategy to overcome the economic and cultural injustices domestic workers face at the individual (micro) and societal (macro) level (Meagher, 2000). This is consistent with findings from the previous chapter, which argued that gender, class and racial inequalities are often structurally *and* culturally embedded. This chapter builds on findings from the previous chapter to compare struggles for recognition by in-home child care workers in Australia, the UK and Canada.

The remainder of this section outlines how the analysis fits with Williams' framework (described below), and considers claims for recognition using the concepts of visibility, voice, and value. Next, an overview of the employment arrangements for in-home child care workers is outlined for each country, providing insight into a dimension of ECEC policy that is often ignored. The analysis and discussion is based on policy and documentary analysis and is complemented with examples and quotes from key stakeholder interviews where appropriate. The final part of the chapter draws on elements of visibility, voice and value to compare and contrast struggles for recognition among in-home child care workers in Australia, the UK and Canada. Descriptions of these elements are outlined below.

Williams illustrates how the nature of struggles for recognition[39] of care workers revolve around three elements: visibility, voice and value (2012a), where the *visibility* of care workers is the first step to gaining political *voice* and representation, which are necessary to gain recognition of the *value* of care work. Drawing on Williams' broader framework that incorporates elements of recognition, redistribution and rights, it is proposed that struggles for recognition by in-home child care workers are linked to gender equality claims in relation to rights and redistribution in favour of mothers and children as in-home child care users: gender equality claims that arise from feminist demands for rights as earners create pressures for affordable child care and, in turn, has led to struggles for recognition by advocacy groups representing underpaid (often migrant) in-home child care workers. At the same time, children's rights to good quality care provide an opportunity for certain groups of in-home child care workers and associations to campaign for recognition and inclusion as professional ECEC workers. Similarly, claims for redistribution of care responsibilities from the family to the state and market create opportunities for groups representing in-home child care workers to lobby for policy changes that give equal treatment to users of in-home child care and, in return, equal recognition to the in-home child care workforce.

The recognition of care work as a social good is central not only in relation to gender equality claimants' rights as earners (Williams, 2012a, p. 110), but also to recognition of the value given to care workers. As mentioned above, in the three countries, struggles for recognition by in-home child care workers focus on different objectives: to achieve visibility, voice and value. Those seeking value are struggling for equal recognition in the ECEC sector – as professional educators *and* care providers. Drawing on discussion from the previous chapter, this chapter argues that challenges remain where care and migration policy impose new and compounding inequalities for care workers. In

---

[39] Also see Nancy Fraser's work on struggles for recognition (Fraser, 1989, 2005), from which Williams and Meagher draw on.

countries where care workers experience intersecting issues of gender, class and race, recognition in relation to visibility and voice must first be achieved.

Policy context: Employer-employee relationships

The issues of gender, class and race discussed in Chapter 7 are played out in the unequal relationships between employer and employee. The different ECEC and migration regulations guiding the employment relations for in-home child care workers in Australia, the UK and Canada have implications for the quality of ECEC for children receiving care, and also for the recognition of the care workers. First, the contractual relationships between in-home child care workers and their employers are central both to their visibility as a social group and to their rights as citizens. This is particularly relevant to informal care in the domestic sphere where workers are sometimes 'hidden' from the public domain and excluded from social protection policies and employment regulation. Employment relationships also affect care workers' ability to make their voices heard and represent (or be represented) as (sometimes migrant) workers. Third, contract relationships contribute to whether their work is valued as a social good through recognition and fair remuneration. Very different contract relationships are mandated for in-home child care workers in Australia, the UK and Canada and, in many cases, the rules and regulations vary within the country. These are summarised in the Table 17, below, and discussed further by country.

Table 17: Summary of employment status, in-home child care, Australia, the UK and Canada

	Employed by organisation	Contractor/Agency registration	Self-employed
Australia	*some examples in Australia (not a regulatory requirement) NannySA Susan Rogan Family Care Dial-an-Angel ('Staff Angels') Remote & Isolated Children's Exercise	In Home Care (through FDC schemes and other provider organisations)	Registered with Department of Human Services Private nannies
United Kingdom	*some examples (not a regulatory requirement) One Parent Families Scotland @HomeChildcare	Registered with Childcare Agency (Scotland)	Ofsted registered nannies (Home Childcare) Private nannies
Canada			Live-In Caregivers Private nannies

*This is not an exhaustive list of organisations that operate as the employer of in-home child care workers.

Australia

The two types of in-home child care in Australia recognised by policy are the approved In Home Care scheme and in-home care workers registered with the Department for Human Services. These two types of in-home child care are often distinguished by the level of funding available to families (which is much lower for registered in-home child care) and the regulations or standards that workers must comply with. However, these are not the only factors that distinguish these two types of ECEC. The relationship between the care worker/educator and family receiving the care is critical to understanding deeper issues related to the recognition of care workers and the value of in-home child care. The In Home Care program is delivered through provider organisations (both public and private), including family day care schemes, community service organisations, local governments, and private agencies. This is in contrast to in-home child care workers who are voluntarily registered with the Department for Human Services (and the comparable UK Ofsted register discussed below) where the care worker is directly employed by the family (employer). In Home Care workers/educators

are predominantly contracted by the provider organisation (who has a service contract with the Commonwealth Department for Education) to provide child care to children in the child's own home. The provider organisation contracts the care worker, and is responsible for monitoring the standard of the care provided in the child's home. Most provider organisations with In Home Care contracts with the Department for Education employ care workers as contractors and therefore the workers do not have the protection that an employee has.

The In Home Care model was set up as an extension of the self-employed family day care model, where care is provided in the caregiver's home. However "a lot of issues and things that face an In Home Care educator are quite different, and the challenges they have are quite different, to a family day care educator who has control of their environment". At the same time, despite the lack of regulation for In Home Care, and "even though In Home Care didn't have its own standards, or regulations as such, a lot of those services were sort of treating it like family day care, so that risk factor was sort of reduced" (Peak organisation, Australia-12). However, since In Home Care was implemented, the number of provider organisations with In Home Care contracts has expanded and diversified. This is positive in many ways as these provider organisations have the potential to better meet the needs of the local community; however it also poses new challenges of maintaining consistency across the sector. The inconsistency in the sector was identified as an issue (RPR Consulting, 2005) and Interim Standards for In Home Care were implemented in 2008 in response to these concerns. However, beyond the guidelines outlined in the Interim Standards, there is wide variation across the providers in relation to the standards, policies and resources in place to protect the child/family and the care workers.

Hiring care workers as contractors has implications for employment rules and regulations because contractors are required to have their own Australian Business Number to allow them to operate as an independent contractor. However,

> the confusion […] is if you have your own ABN you're seen as a contractor and […] once you get past six months you're no longer deemed a contractor, you're actually supposed to be employed by the family (Nanny association, Australia-08).

Another peak organisation points out the "confusion" with the employment status of In Home Care workers, where there are:

> [a] range of different sort of scenarios that [IHC contractors] fall under when they're in this strange situation whereby they're under contract for a service but they look like employees in other ways…so it's really quite a grey area [and] they can't be employed by the family because the family will lose all their CCB entitlement for that care arrangement (Peak organisation, Australia-12).

There are, however, some provider organisations who structure their services differently (see Table 17). Some organisations hire care workers as employees, rather than have them work as independent contractors to families. A private in-home child care provider organisation contrasted her approach to hiring IHC workers with the rest of the sector:

> [The] majority of services, both community and private, call their carers contractors so they don't have to pay them super and don't have to pay them award wages, and don't have to pay them holiday. And women wouldn't be exploited like that in any other sector (Nanny agency, Australia-20).

In these services, the care worker has greater protection and security, and also access to training and resources. This structure of service provision also exists in the UK (in different ways in England and Scotland); however it is not mandated by regulation, as discussed below.

United Kingdom

In contrast to Australia, in the UK families hiring nannies directly are eligible for tax credits and childcare vouchers, provided their care worker is registered with Ofsted. As described in Chapter 5, voluntary registration with Ofsted requires Home Childcare workers to hold qualifications to protect the safety of children, namely first aid training and policy checks. Ofsted is responsible for ensuring in-home child care workers have the required documents. Self-employed in-home care workers who choose not to register with Ofsted are still required under employment and taxation law to sign a contract with their employer, and follow the same employment regulations (including insurance, tax contributions, and minimum wage). There are a number of companies that cater to families hiring in-home child care workers by writing contracts and ensuring families adhere to employment laws.

Migration policy in the UK provides an avenue for members of the European Union to work in private family homes in the UK. There are also *au pair* schemes that allow young people from countries outside the EU to live and work in private homes for up to six months. Employers are not required to pay minimum wage, as the *au pair* scheme is promoted as a cultural exchange program (Newcombe, 2004). Many of these *au pair*s remain the UK long-term after living with a family and operate within the informal economy, unprotected from *au pair* guidelines or employment regulation.

There are some exceptions in the UK. First, Scotland has taken a different approach to regulating the hiring of in-home child care workers. In contrast to England where care workers voluntarily register with and are monitored by Ofsted, families in Scotland who want to be eligible for tax credits and vouchers must hire an in-home child care worker through a Childcare Agency. Childcare Agencies link families to care workers and are also responsible for monitoring requirements, such as police checks and first aid training. For the most part, however, the care worker is still employed by the family, but the agency facilitates the contract and is responsible for basic checks.

In both Scotland and England, some agencies and organisations operate differently. A handful of organisations choose to employ in-home child care workers directly. As one provider organisation explained, "the fact that we employ [the in-home care workers] […] makes life easier, they don't have to talk to the parents about money, they can have the difficult conversation with us. So we will speak to the families about fees" (Provider organisation, UK-12). These services tend to provide training and resources for the care workers, and in some cases cover a portion of the cost of the care worker's insurance (Provider organisation, UK-12, UK-17; Peak organisation, UK-16). Two organisations in particular, mentioned in Chapter 5, received some funding from local government which subsidised the cost for lower-income families requiring non-standard hours of child care. This makes flexible in-home child care available to families that otherwise would not have been able to afford in-home child care (Provider organisation, UK-12, Peak organisation, UK-16). This means that the costs to families are not directly linked to the wages of in-home child care workers, as is the case under traditional nanny employment arrangements. Instead, in-home child care workers are paid according to their qualification level, experience and hours worked; and families who need flexible,

non-standard hours of care pay the organisation based on income. Wealthy families who prefer in-home child care can also hire care workers through these organisations and pay the full hourly cost, minus any assistance they receive through employer childcare vouchers. This increases the assurance that the care worker is well-trained and monitored and they only pay for the hours of care agreed under the contract with the organisation.

Canada

The Canadian model shares some similarities with the UK; however there are no regulatory measures in place that are linked to ECEC policy. Nanny agencies in Canada are concentrated in the migrant caregiver market. These agencies connect families to migrant workers entering Canada as part of the Live-In Caregiver program. Some agencies focus on live-out nanny arrangements, which include mostly 'local' migrant workers (many who have recently gained residency). Other agencies also match English-speaking nannies with "high end" clients who are looking for "more than care" (Nanny agencies, Canada-01; Canada-16, Canada-13). Once Live-In Caregivers gain permanent residency, they lose the protection they had under the rules of the LCP. Some agencies are involved in establishing contracts between the family and in-home care workers; others are simply used to connect employer and employee and have no responsibility for ensuring employment regulations are met and maintained.

The influx of migrant workers, in combination with the absence of ECEC policy to encourage families to hire trained child care workers, encourages patterns of low-cost in-home child care. Employer-employee arrangements are therefore established outside employment and migration rules, and create a grey market economy of (largely) migrant care workers who have recently gained permanent residency. They are often referred to as the 'hidden workforce', who struggle to negotiate wages and conditions with employers that can lead them to better employment opportunities. One key informant in Canada noted similar trends in the U.S. and UK, stating that

> the features of this [in-home] care model, as I describe it, that I think make it unique and problematic…are the employee status of the care provider, because all of these countries [Canada, U.S., UK] have made them self-employed, have exploited them with low financial value for

222

their work, have exploited their care giving capabilities by aligning it
with mothering (Key informant, Canada-17)

Under these circumstances, little recognition is given to in-home child care work as a social good. When child care is excluded from the ECEC sector, and even from the formal labour market, there is little space for care workers to be represented, or even visible in the formal economy.

From recognition to professionalisation

The recognition of care as a social good has been central to policy debates and advocacy movements since the 1960s. Feminist groups campaigned for recognition of the value of informal, unpaid care work that mothers performed in the home. Some argued that it should be given equal recognition as paid work in the (formal) labour market. Claims for the recognition of care work are also central to demands by gender equality claimants for non-parental care to facilitate mothers to enter the labour market (Williams, 2012a). Recognition of the value of non-parental care work in the home is a relatively new struggle that stems from shifting ideas and new boundaries between informal/formal care work and public/private responsibilities for ECEC. Across the different elements of visibility, voice and value, struggles for the recognition of in-home child care workers can be explained by new ideas about care and education, and also new approaches that look outside national boundaries to address increasing demands by families for more flexible ECEC.

Scholars from the early childhood education and care field have identified how the restructuring of welfare state policies has changed the position of ECEC workers in different, and competing, directions. The focus on early education, as part of a social investment discourse, promotes the professionalisation of ECEC workers. At the same the restructuring of welfare states has led to the marketisation and commodification of care work, resulting in its downgrading.

International and national ECEC policy research contends that "quality early childhood education and care depends on strong staff training and fair working conditions across the sector" (OECD, 2001, In Moss, 2006, p. 30). There are challenges to training and improving the qualifications of the majority of the ECEC workforce that is split between largely untrained 'child care' workers and qualified early 'educators' (Moss,

2006). Home-based child care (family day care and childminders) and in-home child care, has for a long time been undervalued as 'mother substitute' care with little need for formal training to meet the 'care' needs of young children. As more mothers join fathers in returning to, or remaining in, the workforce after having children, there is increasing demand for non-parental child care, yet at the same time there are fewer women to fill the demand, particularly where there are few incentives to enter an underpaid and undervalued occupation (Moss, 2006; Osgood, 2006).

Regulatory reforms in the UK and Australia have sought to improve the quality of care and education provided by childminders and family day care educators, respectively. Scholars have illustrated how governments' emphasis on 'education' over 'care' has increased the recognition of these workers as professionals (see Cook, Davis, Williamson, Harrison, & Sims, 2013; Langford et al., 2013; Simpson, 2010a). Yet, at the same time, recognition of 'education' does not extend to all types of ECEC and care workers. In the UK, the establishment of the Early Years Professional arguably created further segregation between 'teachers' in preschools and other nursery workers and home-based care workers (Lloyd & Hallett, 2010; McGillivray, 2008; Osgood, 2009; Simpson, 2010b).

Migration policy, too, impacts the status and recognition of workers. Nicky Busch suggests that migrant in-home child workers in the UK have experienced 'deprofessionalisation' due to the recent influx in migrant workers (Busch, 2012). However, recent campaigns indicate new support for the recognition of home-based workers as part of the ECEC workforce. In Australia struggles for recognition of care workers are central to broader ECEC campaigns aimed at improving the pay, conditions and value of ECEC workers. These struggles for recognition have been concentrated in the centre-based sector; ambiguity remains regarding the place of FDC and In Home Care in the professionalisation of ECEC (Cook et al., 2013; Lyons, 2012). In Canada, recognition of the ECEC workforce is dominated by views of the early childhood teacher (Harwood, Klopper, Osanyin, & Vanderlee, 2012; Langford et al., 2013). The value of ECEC is therefore aligned with discourses of professionalisation and investment in early 'education' (Langford et al., 2013). Home-based arrangements (in

the child and caregiver's home) in Canada remain part of the private 'care' domain that is not valued as a social good, particularly not as a professional occupation.

Struggles for recognition for in-home child care workers revolve around the elements of visibility, voice and value and, it is argued, begin to challenge current understandings of the scope and roles of the ECEC workforce. Also, this discussion raises tensions between government priorities to increase the qualifications of the ECEC workforce and, at the same time, respond to demands for more flexible, affordable, in-home child care options. Can in-home child care be valued as a form of high quality ECEC? Where does the in-home child care worker fit within the sector's workforce agenda? And how do care and migration policies shape the struggles for recognition for in-home child care workers? These questions are considered in the discussion below on the recognition of care in relation to visibility, voice and the value of in-home child care workers.

Struggles for visibility and voice: the hidden migrant workforce

> "People living in Canada who have a status don't want to be nannies"
> (Nanny agency, Canada-16)

In the UK and Canada claims for recognition of in-home child care workers revolve around struggles for visibility as citizens, and for voice and representation as in-home child care workers. The discussion below highlights the differences between these struggles, particularly the lack of representation in Canada to recognise in-home child care workers as part of the formal ECEC workforce.

In Canada, migrant care workers continue to struggle to make themselves visible as citizens with social rights and employment protection (Bakan & Stasiulis, 1994; Brickner & Straehle, 2010). However, public discourses (Slavkov, 2003) and cultural acceptance of class and racial inequalities among care workers have posed a barrier to gaining representation among key policy stakeholders to make a case for the value of their work as care workers. Arat-Koc summarises this cultural acceptance when stating "there is no longer a strong-enough and effective-enough political voice, from feminism or immigrant organisations to challenge the unacceptability of these conditions and to demand change" (Arat-Koç, 2012, p. 8). There are therefore a number of hurdles for migrant care workers in Canada to achieve recognition of the value of their work within

the ECEC sector. This includes the hidden nanny workforce in ECEC campaigns for equal pay, training and working conditions that seek to recognise the value of other parts of the ECEC workforce.

As discussed in the previous chapter, the live-in requirement of the migration scheme is the primary driver for exploitation and abuse (Brickner & Straehle, 2010). Caregivers receive minimal wages (after room and board are taken out), and face restrictions in seeking employment outside their sponsoring employer's home. The potential to exploitation and invisibility as workers is highlighted by attitudes toward the role and freedoms of migrant care workers where one representative from a nanny agency explained: "unless they're in an abusive situation [they] should stay there for one year, because that's why [they] came to Canada…why did [they] come to Canada? To be a caregiver. So it's not like they're changing from a secretary to a nanny" (Nanny agency, Canada-16).

Migrant workers are permitted to work only in the home of one family, and (while on a temporary migrant visa) are not allowed to work in centre-based settings. A representative from a nanny agency explains the implications of this, specifically in relation to the demand for centre-based ECEC workers:

> the way the Live-In Caregiver program is structured is that a caregiver… can only work for one family…so they cannot work…in any other setting other than a home. It would be useful if they could be accepted, in perhaps, daycares (Nanny Association, Canada-07)

In addition to the restrictions of the LCP rules, exploitation and abuse escalated in the 2000s prior to 2008 reforms that shifted responsibilities from caregivers to employers (families) for the costs of the application and travel. Before, when caregivers were responsible for these costs, many migrant workers "were coming into fake jobs, and [employers were] having housekeepers and people who were more like maids, working all jobs under the sun, working long hours, not getting paid overtime, not being treated properly, etc." (Nanny association, Canada-15). Reflecting on the changes, she believes that

> [The program is] much tighter [now], they're doing much more screening…it's creating legitimate jobs…I think it's a good thing

226

> because for a while being a nanny was looked down on because it was such a menial job because there was so much bad going on with the program, but you know with this it's going to increase the respect for child care and home care (Nanny agency, Canada-15)

However, others disagree with giving greater responsibility to families and the presumption of unequal relationships between families and caregivers reflects the dominant culture that supports the continuation of the LCP: "these girls [are given] an opportunity to come to Canada to work so they should be making some sort of sacrifices" (Nanny agency, Canada-16). This statement supports evidence that strongly suggests that paid domestic work has become racialised. As Steill and England argue, "key to the process of racialization is the ideology that a domestic worker's relative worth is judged relative to the poverty (or wealth) of her country of origin" (Stiell & England, 1997, p. 342). These racialised assumptions are entrenched through gendered assumptions about 'women's work', where the entry of more women into the workforce enables privileged couples to pay for caregiving work but does "nothing to raise the social status of traditionally female occupations, especially caregiving" (Brickner & Straehle, 2010, p. 317).

As mentioned earlier, the pay and working conditions of migrant care workers do not necessarily improve once they gain permanent residency. Many migrant workers who gain permanent residency continue to work as in-home child care workers, and join the informal market for domestic care services, where many nannies work long hours for low remuneration. The ideal of a trained British nanny in Canada remains for the wealthiest families; however, the realities of the modern working family are drawn on to promote the strengths and "versatility" of (the largely) Filipino workforce: "now we have to be a jack of all trades, look after the children and keep your home organised for you" (Nanny agency, Canada-16).

Similar issues of a 'hidden workforce' have exacerbated in the UK (specifically England) since the expansion of the European Union and the influx of migrant domestic workers from Eastern Europe (Busch, 2012; Cox, 2012; Williams & Gavanas, 2008), however it should be noted the invisibility of au pairs in the is also arguably au pair arrangements are viewed as a cultural exchange separate to issues of migration and mobility (Newcombe, 2004). With the opening up of the EU in 2004, *au pair*s are

"increasingly invisible and at risk of exploitation because of changes to the UK *au pair* scheme" (Cox, 2012, p. 34). Prior to the abolishment of the *au pair* visa in 2008, *au pair*s were not recognised as workers; instead *au pair* placements were regarded as 'cultural exchanges' and, as such, *au pair*s were specifically excluded from minimum wage and working time regulations" (Cox, 2012, p. 35). However, despite the ambiguous status of their work, the *au pair* visa protected migrant women through laws that prescribed working hours and conditions[40]. Since 2004 migrant workers from EU countries no longer require visas, which has made *au pair*s 'invisible' to authorities. They are not considered workers, yet the Home Office no longer prescribes the role of *au pair*s nor provides advice to employers and *au pair*s (Cox, 2012, p. 37). As a result, "they are still not officially workers but they are no longer defined as anything else either and this puts them further beyond the official gaze" (p. 39).

As a result *au pair*s and 'degraded nannies' enter the informal market for (mostly) unskilled domestic work where many employers are concerned more with their willingness to do the housework and cleaning than with their ability to provide quality care for their children (Busch, 2012). This form of low-paid child care and domestic work is in demand by middle-income families struggling to reconcile work and family responsibilities. However, these families cannot afford the British ideal of a well-trained nanny and therefore turn to the growing market of migrant care workers to meet their needs. Under ECEC regulation, it is voluntary for in-home child care workers to register with Ofsted. In many circumstances, particularly where a family's income is above the tax credit threshold and do not have employer childcare vouchers, there is little incentive for the family to hire an Ofsted registered nanny. As one nanny association explained "a lot of families are not going through agencies, are not doing things properly or legally" (Nanny association, UK-08). Scholars agree that "employer behaviour [is] shaped by the view that is [is] acceptable – even helpful – to informally

---

[40] Between 2004 and 2008 the au pair visa still existed for migrant workers coming from non-A8 countries.

employ migrant women in forms of downgraded, 'deprofessionalised', nanny employment" (Busch, 2012, p. 55).

Migrant workers, too, may see a benefit to working under the table so they are not liable to pay tax. There is consensus in the sector that "a lot of nannies don't want to be registered with Ofsted…They say 'why should I pay 110 pounds to register with Ofsted when I don't have to?" (Nanny association & provider organisation, UK-02). This creates an invisible domestic workforce, who is easily exploited within a black market of "families wanting more for less" (Nanny association, UK-08).

A voice for whom? Representation of in-home child care workers

"[B]asically we want to say 'nannies are here', we want to look after then…offer the training and support they need…just making sure they've got the help they need […] because there's nothing out there for them" (Nanny association, UK-08)

Intersecting care and migration policies shape the voices of groups advocating for in-home child care workers very differently. In Canada and the UK advocacy groups represent in-home child care (and other domestic workers) to challenge the unfair working conditions related to their temporary immigration status. Movements in both Canada and the UK have been effective in giving voice to groups of migrant workers and in influencing policy reform relating to their social rights and working conditions. At the same time it is worth noting that the recent International Labour Organization on the Convention on the Rights of Domestic workers was not ratified by the UK, Canada or Australia (International Labour Office, 2011; International Labour Organization, 2013). Struggles for voice and representation of in-home child care workers take different forms in the three countries. In particular, they are split across ECEC and migration, discussed below in relation to the UK and Canada, in particular.

In Canada, "despite their vulnerability… [there have been] collective formal acts of struggle and resistance by domestic workers" and INTERCEDE[41] has been "prominent in their struggles to improve domestic workers' rights" (Stiell & England, 1997, p. 342). On the other hand, in-home child care has largely been excluded from ECEC advocacy campaigns to improve the recognition of the formal *ECEC* workforce. Struggles for representation of in-home child care workers in Canada are therefore contained as part of advocacy efforts to improve the visibility and voice of immigrant domestic workers opposed to their value as child care workers in particular. This is in contrast to the UK where representation in the nanny/domestic industry is divided along racial lines – there is a voice for migrant care workers (similar to Canada) to improve their rights and there is a voice for non-migrant nannies to achieve recognition in the ECEC workforce.

In the UK, the organisation Kalayaan advocates a similar position as INTERCEDE in Canada for changes to immigration legislation and employment rights to achieve social justice for migrant domestic workers (Kalayaan, 2013a, 2013b). Newcombe suggests that NGOs and agencies could play a greater role in educating *au pairs* and advocating for their rights (Newcombe, 2004). However, struggles for recognition also exist in relation to the Early Years sector. Many advocates feel families and children should have adequate quality care, regardless of the type and setting of care. Leading up the introduction of the voluntary Ofsted register for Home Childcare providers, groups in the nanny industry struggled for representation in consultations of the Early Years' sector led by the government. At the time (as mentioned in Chapter 6), a registry for in-home child care was only open to registered childminders wishing to also provide care in the child's home. The nanny industry was outraged that nannies were not represented in the consultation leading up to the 2002 reform (Tweed, 2002a). The Professional Association of Nursery Nurses (now Voice) campaigned "tirelessly for professional recognition of nannies and for other childcarers to recognise and respect the important

---

[41] INTERCEDE is a Canadian advocacy organisation for the rights of domestic workers, caregivers and newcomers.

role that nannies perform" (Pritchard, 2004). The introduction of the voluntary register for nannies (Childcare Approval Scheme) in 2005 brought financial assistance to families using registered nannies (Tweed, 2004); however the industry continues to push for compulsory registration of nannies to improve the professional recognition of nannies and to provide adequate safeguarding for children (Morton, 2012).

Two contrasting struggles therefore exist: a push for recognition of 'professional nannies' by associations representing trained care workers and, at the same time, calls from advocacy groups representing migrant domestic workers (such as Kalayaan) to give voice and recognition to an invisible, 'deprofessionalised' (Busch, 2012) migrant care workforce. These findings suggest in-home child care workers are stratified across the sector, with some nanny associations pushing for increased recognition as professional care workers, while other organisations, such as Kalayaan, represent workers to gain visibility and voice as citizens and care workers – not necessarily within the professional ECEC sector.

Struggles for representation among in-home child care workers have been less apparent in Australia. Until 2012, there was a patchwork of activity among the nanny sector to recognise the status of in-home child care workers *as a defined group* of care workers (Dial-An-Angel, 2014; National In-home Care Association, 2014). More recently (and arguably in response to policy debates about the subsidisation of nannies) the Australian Nanny Association and nanny support networks aim to bring a voice to nannies and in-home child care workers. In contrast to the divisions among the UK nanny sector, an Australian online support network for nannies was developed to provide support for all in-home child care workers: from "low levels of *au pair* care [workers] right up through to premium nannies" (Nanny agency, Australia-03).

The absence of a migration scheme for in-home child care workers in Australia lessens a market for low-paid, informal care and therefore lessens the need to advocate for social rights among in-home child care and other domestic workers. As mentioned elsewhere, this is not to suggest that there is not a grey market for domestic workers; however the absence of policy supporting these arrangements limits the capacity of workers to rally together.

Alternative models of in-home child care are given limited attention on the policy agenda. Innovative models of in-home child care have developed in the north of England to provide flexible, affordable and high-quality care to young children in families working non-standard hours or where circumstances prevent access to mainstream services. Despite efforts to promote the expansion of the @HomeChildcare model across England, the CEO of the organisation feels the government "doesn't understand" the in-home child care model and so has ignored it on the policy agenda. @HomeChildcare is trying to distinguish itself not only from unregulated in-home care options, but also from the class-based traditional nanny used by mostly middle- and high-income families (Provider organisation, UK-12). It is this model of high-quality, flexible and affordable in-home child care that should be recognised, valued and promoted in the ECEC sector.

Valuing in-home care workers: Towards a professional model?

"the more professional nannies have more realistic expectations about what's fair and reasonable and won't be exploited to that extent" (Nanny agency, Australia-20)

The care of young children is provided across informal and formal, public and private and centre-based, home-based and in-home settings. ECEC is delivered by qualified/unqualified and professional/non-professional workers. However, there is little consistency in the way workers are defined and categorised across the workforce. For example, 'un'professionals work in the formal centre-based sector and, at the same time, 'professional nannies' work in the informal, private domain providing care in the child's home. As discussed earlier in this chapter, there is a push for professionalisation of the formal ECEC sector, with aims to increase the qualifications of centre-based workers and home-based workers in care providers' and children's homes. There is some ambiguity about whether workers across all types of ECEC support moves to professionalise (Cook et al., 2013; Langford et al., 2013; McGillivray, 2008; Woodrow, 2008). There are also concerns that professionalisation further degrades the status of untrained workers (Langford et al., 2013; Moss, 2006) or, conversely, lowers the status of trained workers (Lyons, 2012). Studies from Ontario and Australia find that workers (FDC in Australia and centre-based in Ontario) prefer the 'caring' role they had before (Cook et al., 2013; Harwood et al., 2012). In Australia, the NQF (and earlier reforms) created "a divided camp around how FDC workers actually perceive themselves"

(Provider organisation, Australia-16). Hesitations regarding the professionalisation of family day care were echoed by stakeholders who feared that excessive administrative responsibilities and increasing rents "forced FDC to professionalise", which might have consequences for the unique qualities that FDC offers. As one peak organisation stated, when you're trying to professionalise a group you've got to make sure you don't lose some of the really good things" (Peak organisation, Australia-15).

So, where does the in-home child care workforce fit into this debate? The discussion above illustrates that struggles for recognition of in-home child care workers in Canada and the UK emerged from the invisibility of the hidden migrant workforce and, in the case of the UK, there is a coinciding struggle for (largely) non-migrant 'professional' nannies to have a voice and be represented in the ECEC sector. As mentioned, there are campaigns in the UK led by representatives of, largely non-migrant nanny associations seeking recognition as professionals in the Early Years sector. For many, recognition in the Early Years sector requires increased regulation and monitoring of the in-home child care workforce. There is broader consensus across the UK that nannying "has a really important role to play [but] the difficulty …is the status… [there needs to be some] sort of training coming along for nannies so they can be encouraged to get qualifications and [so] that parents think this is a good thing, opposed to 'let's get as cheap as we can'" (Peak organisation & provider, UK-01).

The nanny industry made some progress toward recognition through the voluntary Ofsted register in 2005; however there are concerns that there are more *au pair*s on the Ofsted register than 'professional' nannies because there is no recognition or status given to registered nannies:

> the idea behind the registration was that it should give some kind of professional status to nannies. I don't think it's been successful in that area. It has been more of a benefit to the families … not the nannies (NurseryWorld, 2007).

The British Association of Professional Nannies (BAPN) envisions a system where a registered nanny would "be a sign of quality…[who] takes herself seriously, sees herself as a professional". This push for recognition as Early Years professionals stems from frustration with the fact that "anybody could call themselves a nanny" and the "lack of

233

requirements when it came to parents" employing nannies (Nanny association, UK-08). This observed complacency among families hiring nannies in the UK is contrasted with the "attitude difference" of Australian families. A representative from a nanny agency with experience working across the UK and Australia explains that in the UK

> people see quality care as being care from a nanny. It's just accepted to have a nanny whereas here [in Australia] …nannies seem to be fighting an uphill battle and people seem to see them as babysitters or cleaners that also will look after your child … [it's understandable] why people would think that because a lot of people are unqualified…but there's an attitude difference between here and the UK (Nanny agency, Australia-03).

With this in mind, there is a push in Australia to increase the quality of in-home child care, and the care sector more broadly, so in-home child care workers are recognised as professionals and protected from poor working conditions. For example, it is suggested that the more professional nannies have "more realistic expectations about what's fair and reasonable and won't be exploited to that extent [by accepting poor working conditions]" (Nanny agency, Australia-20).

A representative from another nanny agency agreed that in-home child care needs "to be regulated properly so [workers] don't get taken advantage of because a lot of times people do get taken advantage of, and you'll see people working 60 hours a week for $150 or something and thinking that's what's normal, and it's not normal" (Nanny agency, Australia-03). However, in Australia concerns about exploitation of in-home child care workers are not racialised, but rather explained in terms of the absence of professionalism. Young, untrained *au pair*s are distinguished in policy debate in relation to their rights to different wages and benefits, but are not disregarded or ignored as they are in Canada and the UK.

In Australia, nanny agencies and stakeholders involved with in-home child care support movements to recognise the value of *all* care workers, including those working in the home. In-home child care workers are implicitly part of these campaigns. For example, the 'Make Care Fair' campaign is organised by a private care agency catering to the needs of many wealthy families not eligible for In Home Care. Another private care agency stated that "putting child care under the minimum wage award is actually an

insult because it's actually a profession and it should have its own award as a profession, and it doesn't" (Nanny agency, Australia-09). This is in contrast to agencies in Canada who did not value the work of in-home care workers, and accepted that it was work to be done by women from third world countries.

The In Home Care program in Australia arguably shapes the recognition given to in-home child care workers and has established a standard that is used to judge the inferiority of other, less formal, and domestic forms of in-home child care. An In Home Care provider explained that,

> a nanny is different…I don't want to say an educator is more professional than a nanny… I always associate nannies with childminding […] whereas an In Home Care [is an] educator… educators they have to be compliant, so there are obligations and commitments they have to adhere to even work in In Home Care…very different care. And In Home Care is not domestic care (Provider organisation, Australia-04)

Unregulated in-home child care is not only accepted by families in Canada, it is also accepted by the broader in-home child care sector and representatives. As mentioned previously struggles for the recognition of nannies are limited to the protection of their rights as workers, not their status in the ECEC sector. Based on the UK and Australia, it would be expected that there would be pressures to professionalise the in-home child care workforce; however, as one nanny agency explained "[but] a nanny isn't like a Registered Nurse, like they can't pull the license, she's just a woman who offers child care…even if they have their ECE qualification they don't have a nanny card that can be taken away" (Nanny agency, Canada-01).

Struggles for the recognition of care work as a valuable social good therefore differs in the three countries. Where groups of in-home child care workers have gained visibility as citizens and representation as care workers they are able to make stronger claims to be included as a part of the professional ECEC sector. The history of care and migration policies shape cultural assumptions about the division of care responsibilities and, in turn, impact whether in-home child care workers are able to gather support and representation to be recognised as workers and ECEC professionals.

Hierarchies of in-home child care

Analyses of ECEC policy gives limited attention to employment structures and employer-employee relationships. This chapter illustrates how these details are central to the status of in-home child care (and other domestic) workers. Employer-employee relationships on their own, and in combination with ECEC and migration policy, impact the way different issues of gender, class and race affect families and care workers and, as a result, shape group struggles for recognition as citizens and workers. Previous chapters discussed how policy frames and care culture shape the types of inequalities that affect families and care workers, and this chapter further highlighted the differences in the treatment, status and recognition of in-home child care workers in Australia, the UK and Canada.

As discussed throughout the previous two chapters, embedded assumptions about appropriate forms of care, and appropriate employment conditions, are central to understanding why group pressures for recognition vary depending on the different types of issues relevant to groups of in-home child care workers. The issues and inequalities differ depending on the intersection of ECEC, migration and employment policy; they are also shaped by their status and recognition in relation to the broader ECEC workforce. Where in-home child care is incorporated within mainstream ECEC the issues that are relevant to in-home child care workers are also relevant to the broader ECEC sector, and vice versa. Of these three study countries Australia's In Home Care program resembles this circumstance the most. In contrast, the in-home child care workers that are part of the Live-In Caregiver program in Canada are the most segregated from the formal ECEC sector. Before these workers can struggle for recognition within the ECEC sector, they must first be visible and gain social rights as citizens and workers. In the UK, there are divided struggles amongst in-home child care workers: migrant workers are struggling for visibility and representation as a hidden and underpaid workforce; while groups representing trained/formal nannies are campaigning to distinguish themselves from untrained (and migrant) workers and for inclusion within the ECEC workforce and recognition as professional ECEC workers. Despite these two separate struggles for recognition, both types of in-home child care are in fact treated the same under funding and regulatory measures. Therefore, struggles for recognition go beyond claims for rights and visibility as citizens and representation as care workers;

some in-home child care workers seek representation within the ECEC sector in order to gain professional recognition.

If in-home child care workers are to be truly recognised for the work they do, there must be greater value given to care work in the home. One representative from the UK expressed that "in an ideal world…early years is seen as a profession that people want to go into with men going into it as well because at the moment we've got a phenomenally low intake of men but that comes down to salaries...need to raise the standards" to increase the value and recognition (Nanny agency, UK-20). As Williams' states, the social value attributed to care is how a society remunerates its care workers through practical support such as formal career paths, training for care work, and developing accreditation frameworks (2012a, p. 114). Increased emphasis should be given to addressing the hierarchies among the ECEC sector, and among the in-home child care workforce. A first step forward is to provide greater training and protection to in-home child care workers, which is best achieved through linking them to service organisations, and preventing the direct employer-employee relationship.

Movements to integrate and restructure in-home child care workers within the ECEC sector will likely face different barriers in the three countries. The challenges are shaped by embedded assumptions about who should be responsible for child care, and whether those who are responsible should be trained and remunerated equal to other ECEC workers, and recognised as professionals.

Chapter 9: Conclusion

In-home child care is not a new phenomenon in Western countries. For centuries children have been cared for in their own home by relatives and non-relatives alike. Non-relative care in the child's home has, however, largely been limited to the upper echelons of society, or offered as a temporary solution, such as care provided by babysitters and neighbours. Similarly, government involvement in early childhood education and care (ECEC) has been an issue for public and policy debate since the 1960s. However, debate about ECEC from the 1960s to 1990s focused primarily on *who* should receive publicly funded care and education services; in liberal countries public support for child care has historically been limited to the most vulnerable children and families, and so for situations where mothers' participation in paid work was a necessity, rather than a choice. Until recently, both research and policy debate have largely focused on either centre-based services, or family based care in the home of the provider. Care provided in the home of the child has largely been outside the gaze of public policy.

Since the 1970s governments across the developed world have pursued policy reforms that restructured the responsibility for social services and benefits, including care, across the state, community, and private domains. In the ECEC sector, market mechanisms in all three liberal countries in this study promote the privatisation of services to non-profit and for-profit service providers. Public financing subsidises private care in the formal and informal domains. This means that public subsidies flow to private providers, often including commercial operators and publicly traded companies. More informal private arrangements are publicly supported where families using in-home child care are eligible for financial support through the same subsidies and tax measures that support mainstream ECEC. This often reflects the process of commodification, where care is moved from the unpaid sector to the paid, but still largely private and informal, sector. The process of commodification is therefore facilitated by care policy that allows public funding to flow to users of informal, private providers. Care work is also increasingly commodified through migration policy that creates formal avenues for care workers to migrate across national borders to seek employment opportunities in private homes.

238

The increasing interest in in-home child care from governments, employers and families is driven by changing demographic trends, including increases in maternal employment rates and patterns of non-standard work. The interest in in-home child care is part of governments' broader ECEC policy agenda that is driven by both an emphasis on women's work and children's early learning and development (However, as noted throughout this thesis, the development of the Live-In Caregiver program in Canada developed largely separate from ECEC policy). Despite changing rhetoric that combines objectives under the term 'ECEC', the care (women's employment) and education (children's development) aspects remain separate in policy initiatives. In-home child care is therefore positioned within an ECEC sector that is driven by (sometimes) competing goals for children's education and mothers' workforce participation. In-home child care poses further complexities because it crosses the public/private and informal/formal domains.

Addressing the research questions

This thesis aimed to examine in-home child care as part of the restructuring of welfare state policies over the past four decades in three liberal countries – Australia, the UK and Canada. In particular, it questioned how and why these three countries support in-home child care, as a largely informal and unregulated form of *care* while, at the same time, governments and key advocates in these countries promote investment in high quality *education (and care)* that supports children's development and wellbeing. The development of these two parallel ECEC objectives arguably rests on a liberal (or human capital) 'social investment' approach to social policy which promotes individuals as participants in the market economy. Here, individuals are viewed as earners and consumers (parents) and also future workers (children). This is in contrast to the post-WWII welfare state that aimed to protect individuals from the market (Bonoli, 2005; Morel et al., 2012). Governments' promotion of women's and mothers' employment has implications beyond national care policies: demographic changes, namely increases in women's workforce participation, and also an ageing population, has driven demand for low-cost care as alternatives to familial and publicly delivered institutional care, often referred to as the 'care crisis'. The 'care crisis' is identified as a driver for women's migration from poorer countries to more developed countries to provide care for the elderly, people with a disability, and young children. This pattern

has perhaps been most significant in liberal countries where governments tend to take less public responsibility for care provision. However this trend is also evident in other countries where public, universal services are diversifying through a mixed market of providers (Williams, 2012b) and familial care is outsourced to other forms of private, home care (Bettio & Plantenga, 2004; Michel & Peng, 2012; Shutes & Chiatti, 2012).

In this context of demographic changes and governments' promotion of maternal employment and productivity, it became evident that the recruitment of care workers across global borders would be a significant part of a study on in-home child care. The migration aspect of in-home child care was therefore incorporated into the original design of the study – that is, a cross-national examination of in-home child care as a form of government-supported ECEC. As the Introduction and Chapter 3 outlined, the study had four aims and overarching questions that were addressed in Chapters 4 through 8.

1. Is there a relationship between welfare state restructuring and government support for in-home child care?

Aim: To examine the transformation of in-home child care in three liberal countries – Australia, the UK and Canada – since the 1970, by examining:

- What is distinctive about the history of in-home child care in each country? (Chapter 4)
- Who are the main actors and stakeholders that have facilitated and resisted support for in-home child care? (Chapter 4, Chapter 6)
- How has government restructuring shifted ECEC from a peripheral to central position in government policy? (Chapter 4, Chapter 6)

2. How do governments support in-home child care in Australia, the UK and Canada?

Aim: To compare and analyse government and key stakeholders' (structural and discursive) support for in-home child care;

- What policy mechanisms facilitate families' use of in-home child care? (Chapter 5)

- How do governments situate in-home child care within their broader ECEC goals and rationales? (Chapter 6)
- Have policy and funding reforms shifted the domain of in-home child care? Informal/formal? Public/private? Unpaid/paid? Professionalised/deprofessionalised (Chapter 5, Chapter 8)

3. What are the implications of in-home child care policy for families and care workers?

Aim: To analyse and compare the impacts of government support for in-home child care for families and care workers;
- Which stakeholders are campaigning for/against in-home child care and what are their goals? (Chapter 6, Chapter 7)
- What are the consequences for different groups of families and care workers? (Chapter 7, Chapter 8)

4. Why have Australia, the UK and Canada developed diverging approaches to supporting in-home child care?

Aim: To explore how the concept of care culture explains differences across these three liberal countries

The Conclusion begins by summarising the findings that address the overarching questions outlined above, and by linking them to each of the chapters. Next, the Conclusion provides some further thoughts about the significance of these findings for the concept of care culture and for regime typologies. This is followed by policy considerations for in-home child care policy in the three study countries, which should be explored within national and local policy contexts. Finally, the Conclusion identifies how these findings contribute to the research scholarship and proposes ideas for further research.

Restructuring in-home child care
To begin, the review of the literature in Chapter 1 provided a strong basis from which to address the first of the four research questions: *is there a relationship between welfare state restructuring and government support for in-home child care?* The literature

review, in addition to analysis in Chapters 4 and 6, illustrated how the shift from supply to demand side funding mechanisms, the promotion of a 'productive' economy by increasing women's employment and imposing activity tests for the receipt of subsidies and benefits all contributed to movement toward the individualisation and privatisation of care, including parents' ability to choose in-home child care. It also illustrated how an emphasis on productivity and economic returns shifted spending to children, particularly those from disadvantaged backgrounds that are viewed as 'social risks'. At the same time, demographic changes and the increasingly commodification of care is facilitated by global demographic trends, which are often facilitated by government schemes to recruit migrant care workers to address the domestic 'care crisis'.

Chapter 3 built on many of the themes from the literature review to illustrate how the restructuring of welfare policies played out in the ECEC sector in Australia, the UK and Canada. In particular, it showed how feminist inspired movements for universal ECEC were gradually superseded by alternative rationales for public investment in child care – namely women's workforce participation and children's early education. Movements advocating for and against universal, centre-based ECEC reflected different national political, economic and cultural contexts. In-home child care, as a specific type of ECEC, developed from both the promotion of different forms of home-based care and, in some cases, was a result of resistance to more formal, public, child care provision. Overall, Canada's support for in-home child care experienced the least change – as political preferences for private care arrangements remained strong through the 1980s and 1990s. In the UK and Australia, ECEC advocacy groups offered little support for in-home child care until the late 1990s and early 2000s, when financial support was introduced through different mechanisms and under different policies contexts. Chapter 5 further explored the restructuring of in-home child care, with particular reference to a social investment framework. It illustrated how and why policy changes from the mid-1990s restructured government support for in-home child care. In doing so it discussed how the rationales and ideas driving ECEC shifted from debates about gender equality in the 1970s towards a 'social investment' approach that emphasises human capital. Overall, in-home child care was restructured through broader welfare state changes that introduced greater use of market mechanisms to deliver public funding to private services (discussed further in relation to Question 2). In addition, Chapter 5 pointed to

the role of a 'social investment discourse' in driving greater government investment in policies that promote women's workforce participation.

Government support through policy and discourse

The literature review (Chapter 2) and policy histories (Chapter 3) of ECEC and in-home child care illustrated how welfare state restructuring, including a shift to 'social investment' in the 1990s (Chapter 6), repositioned in-home child care as part of ECEC and broader social policies. These findings led to the second research question: *How do governments support in-home child care in Australia, the UK and Canada?* To address this question, Chapter 5 took a structural analytical approach, while Chapter 6 focused on rhetorical and discursive support by governments, stakeholders and the public. Chapter 5 provided a comprehensive account of the policy details that shape the supply and demand of in-home child care in each country. Based on a structural approach to analysis, the policies that shape the support and demand for in-home child care in each country are presented. It explained how the funding mechanisms, eligibility criteria, quality regulation and migration rules differ in Australia, the UK and Canada. These policy details reflect different levels and types of government support for in-home child care, including care arrangements that cross the informal/formal and public/private domains. The second part examined how the intersections of these policy mechanisms result in tensions and inconsistencies in governments' approaches to supporting in-home child care. Drawing extensively on primary policy documents and interviews with stakeholders, Chapter 6 argued that the different approaches to government support (discussed in Chapter 5) for in-home child care are underpinned by different sets of social investment rationales. It also showed that in-home child care underpinned by common rationales can, in practice, operate very differently. Evidently, there are a range of policy mechanisms that facilitate in-home child care; these include ECEC funding and regulation, and also migration policy. Further, support for in-home child care is also gathered through discourse and advocacy by governments, by key sector stakeholders, and the broader public. The implications from analysis in Chapter 4 as well as the tensions and contradictions identified in Chapter 6 provided the context for more detailed examination of the implications of these policies for children, mothers and care workers.

Implications for families and care workers

Findings addressing the first two research questions, above, led to the need for more detailed analysis of the impacts of these policies and discourses. In particular, question three asks: *What are the implications of in-home child care policy for families and care workers?* This question was addressed in Chapter 7 and Chapter 8. First, Chapter 7 drew on the previous chapters to illustrate how the ideas and rationales that promoted the restructuring of ECEC and care policies (analysed in Chapter 6) have implications for families and care workers. The greater emphasis on the promotion of women's workforce participation to achieve equal opportunity in the workplace has (sometimes) unintended consequences for other groups of women. In particular, the issues of gender, class and race are identified as central to debates about government involvement in in-home child care policy. Chapter 7 argued that the shift in thinking about the purpose of ECEC creates new inequalities that cut across gender, class/income and race/migration lines and have implications for parents, children and care workers. These inequalities are embedded and explained by different care cultures.

Finally, Chapter 8 shifted the focus to the care worker. First, it outlined differences in employment structures in the three countries to show how the employer-employee relationship is central to understanding exploitation and hierarchies that exist across gender, class and race/migration lines. It used Williams' recognition framework, based on the elements of visibility, voice and value, to illustrate that the inequalities created through the interaction of care and migration policy (Chapter 7) have implications for the recognition of in-home child care workers. The informality of domestic care workers in the UK and Canada, partially because of their migrant status, means they are invisible as a workforce and therefore their work is not recognised. This is particularly relevant because many of the women doing this work in the UK are referred to, and refer to themselves, as *au pairs*, however the now defunct *au pair* category was designed as a cultural exchange program where these migrant women are considered a pseudo-family member – not a worker subject to employment regulations. The *au pair* category was not designed for young women to take on primary child care responsibilities, as many do today (Búriková & Miller, 2010; Busch, 2013; Cox, 2011; Williams & Gavanas, 2008).

Despite common patterns of welfare state restructuring, including the use of market-led ECEC arrangements and common social investment discourses, there are also distinct differences in the structures that support in-home child care in Australia, the UK and Canada. And, as the question above addresses, families and care workers experience different inequalities that cut across gender, class/income and race/migration status. However, the final question returns to the theoretical framework to consider *why* these countries differ.

Cultures of in-home child care

Informed by the theoretical approach (Chapter 3), the fourth research question asks: *why have Australia, the UK and Canada developed diverging approaches to supporting in-home child care?* Findings from all five main chapters (4, 5, 6, 7 and 8) address this question. Informed by the theories of institutionalism and welfare regimes, the concept of 'care culture' accounts for structural and normative elements that are central to cross-national analysis of care policies. In particular, care culture captures the interaction between policy mechanisms, new policy ideas, and embedded assumptions about appropriate forms of child care. The concept of 'care culture' contributes to an understanding of why the inequalities experienced by families and care workers are accepted and resisted in different ways. These inequalities are a result of the way in-home child care is supported in different ways in the three liberal countries (Chapter 5), which are underpinned by historical policy legacies (Chapter 4) and contemporary government and public discourses surrounding in-home child care (Chapter 6). Overall, the inequalities, and the variation between countries, are arguably explained by different assumptions in each country about who should care for children and how care should be provided. As Chapter 7 argued, the previous gendered norms and classed divisions (between employer and employee) that existed in relation to the hiring of nannies, particularly in the UK (Busch, 2013; Cox, 2011; Gregson & Lowe, 1994) shifted to divisions along race/migration lines with the opening up of the EU. In Canada, structurally embedded norms were established through the Live-In Caregiver program's support for migrant women to undertake care activities. This is buttressed by an ideological preference for private care arrangements since the 1980s. As Chapter 8 discussed, struggles for recognition among care workers and advocacy organisations differ, as they reflect differences in inequalities experiences by these workers, which are

a result of the structural policy mechanisms in each country. While many migrant women in Canada and the UK have found voice and representation through advocacy organisations, their claims for recognition are not met through policy reform, arguably because of cultural stereotyping that see these women as appropriate carers for young children while their parents participate in the paid workforce. In contrast, in Australia, formal In Home Care workers are aligned to the family day care sector and are part of broader struggles for recognition of the value of care work. The different cultures of in-home child care in Australia, the UK and Canada provide an answer to the fourth question, which asked why these three countries differed. However, these findings also contribute new evidence about broader welfare regimes typologies and theories of institutionalism that underpinned the analytical approach to this thesis.

Care culture and regime typologies

Policy reforms since the 1970s, especially in the last two decades, have altered the way governments support different types of care; and different care ideals and assumptions have adapted to suit these policy structures. Although this study is limited to three liberal countries, the examples illustrate how policy mechanisms across welfare regime 'types' shape the supply and demand of in-home child care. The introduction, and extension, of market mechanisms facilitate care arrangements that previously were positioned squarely in the private domain. New payments and regulatory regimes blur the line between and public/private care and, to different extents in each country, impose contradictory processes of informalisation and formalisation. In many ways the restructuring of payments and regulation are part of broader ECEC reforms; however in-home child care is, arguably, an exemplary case that highlights the tensions and consistencies involved in the restructuring of ECEC services. In particular, market mechanisms and immigration policy intersect to shape the commodification and informalisation of care services, yet at the same time, the introduction of registration and light-touch regulation of in-home child care services point to the professionalisation of nannies, as they advocate for greater inclusion in the formal ECEC sector, particularly in the UK and increasingly Australia.

The findings from this study illustrate that the patterns, policies and cultures of in-home child care in Australia, the UK and Canada differ in multiple ways. Government support

for in-home child care (or policy) differs in relation to funding (tax measures and ECEC subsidies), regulation (of care settings and care workers) and immigration (migration schemes and domestic employer regulations). At the same time, the culture of in-home child care differs according to how the government and the broader public view women's workforce participation, the objectives of ECEC, and the most appropriate form of care for young children. O'Connor et al (1999) proposed that Australia, the UK and Canada developed different gender orientations – gender-neutrality, gender-difference, and gender-sameness, respectively. The conclusions from this study do not seek to propose a new typology for these countries; however the study does seek to illustrate that the different care cultures in these three liberal countries can be explained by the origins (Chapter 4), policy details (Chapter 5), and discourses (Chapter 6). These differences are apparent from other literature that examines ECEC policy in these three countries (Baker, 2006; Brennan et al., 2012; Jenson & Sineau, 2001; Mahon et al., 2012; Michel & Mahon, 2002; White & Friendly, 2012); however it is argued that by using in-home child care as a lens to analyse and compare ECEC policy, and by incorporating migration policy into the analysis, the differences among this liberal welfare regime type are magnified. In particular, the findings reveal that the assumptions about who should provide care for children, and how the care should be provided, point to embedded ideas about gender, class/income and race/migration in relation to the provision of ECEC. These assumptions about the most appropriate forms of care can be linked back to the three identified aspects of care culture: policy origins are embedded in both structural and cultural norms; policy details that dictate structural support for different types of care; and discourses that shape policy makers and the public's ideas about who should care for their children.

In Australia, the origins and embedded ideas about child care were divided across public responsibility for education and private responsibility for care. The success of the community child care movement of the 1970s lost ground to greater support for the family day care sector and, in the 1990s, gave way to policy reforms that promoted private for-profit long day care. Yet, the debates and reforms largely steered clear of proving financial support to users of informal, private care arrangements. The In Home Care initiative in the late 1990s was developed as a targeted support for families unable to use mainstream services, rather than an alternative option for working families. The

current IHC program is formalised and embedded under family day care structures and approved funding mechanisms, overshadowing the fact that it is not regulated under the same legislation. While Australian In Home Care stands out among the three countries as best practice, there is still room to improve by bringing it under the National Quality Framework. Recent demographic and political contexts have created new pressures for policy change – reflected by, for example, the recent political and public interest in expanding subsidies to all families using nannies and in-home child care. Government interest in expanding these subsidies rest on a social investment discourse focused on women's workforce participation, opposed to children's education or wellbeing. Such a policy reform would extend public funding to arrangements currently in the informal and private ECEC sector. If such a scheme is implemented, it is unknown whether the new policy mechanisms would reposition in-home child care on par with other formal, mainstream services, or whether the subsidies would further commodify informal care arrangements. There are also calls by some advocacy organisations to look to other, less developed, countries to recruit migrant care workers in this care domain. While this might point to new discourses of inequality, the current absence of migration schemes to recruit domestic care workers should be viewed as a positive feature of Australia's current in-home child care provisions, which safeguards against further inequalities by race/migration status.

In the UK, nanny care was traditionally based in the private sector; however the ideal of a trained nanny for wealthy families arguably crossed into the formal domain. This type of care was classed because it was only accessible to upper-class families, and also gendered and classed as an occupation for particular groups of young women. It was not until the 2000s that structural support families using nannies was implemented through the Working Tax Credit, yet it is through migration – with the influx of migration from Eastern European countries – that more middle-class families are able to access in-home child care through the informalisation of the *au pair* sector. The large majority of nannies are not registered with Ofsted and, therefore, this type of care arrangement remains largely in the informal, private sector. At the same time, pressures for formalisation of the nanny workforce are driven by professional nanny groups who want greater regulation of the nanny workforce and recognition in the ECEC sector. Pressures for regulation and formalisation are also driven by the argument that more

families than previously can afford to use in-home child care and, therefore, there should be public involvement to ensure the safety and protection of children and families. Demographic and political pressures in the late 1990s in the UK drove support for increased investment in ECEC and, arguably, established a new policy path (Wincott, 2006). Through the lens of in-home child care, the ideal of nanny care arguably remains. Previously this ideal clearly rested in the informal, private domain; now it crosses the blurred domains of the informal/formal and public/private.

Demographic and political pressures in Canada led to the introduction of the Child Care Expense Deduction and Live-In Caregiver program in the 1970s and 1980s, respectively. Despite efforts to shift the path of ECEC policy in the 1990s and early 2000s, in-home child care largely sat outside these debates. In many ways, the interaction of funding (CCED) and immigration policy (LCP) established in-home child care, provided by migrant care workers in the private home, as a desirable child care option for many middle-class families. There is an assumption in both policy and public discourse that it is appropriate to hire migrant women to provide care in the child's home. This type of care is still considered private, despite the fact that public funding is available (through the CCED) as a means to facilitate mothers' employment in the contemporary labour market and these women, in turn, contribute to public revenue. Also, it is perceived that the opportunities for migrant women through the LCP are better than those available in their home country. There is arguably less public support for in-home child care *as a form of ECEC* in Canada. Instead, the interaction of care and migration policy established in-home child care as an immigration and workforce issue, separate to ECEC. With a lack of regulated and affordable mainstream ECEC, there is little public advocacy to overturn the policy mechanisms (tax measures or the formal migration scheme) that do offer many middle-income families an affordable child care option.

The liberal type is often distinguished by its clear emphasis on the private sphere for the responsibility of ECEC, yet the origins, policy structures and current discourses shape different cultures of in-home child care in Australia, the UK and Canada. As indicated in the Introduction, private informal care (by relatives and non-relatives alike) can be a positive choice for parents, however the use of informal, including in-home, child care

can also reflect constrained choices where there is limited availability of affordable and high quality centre-based child care. In addition, with the rise of non-standard work, more families look to flexible options, often provided in the child's home, to meet their work and care needs.

Pressures for greater public involvement in funding and regulating in-home child care largely stem from demographic and workforce pressures – namely mothers' employment and the increase in non-standard work hours. Sometimes these pressures extend to demands for migration policy reform to increase the availability and affordability of in-home child care workers. However, there is a separate, sometimes competing, pressure that comes from in-home child care workers and advocates; that is to formalise and professionalise nannies as part of the ECEC sector, to better recognise workers' knowledge, skills and experience.

Findings from this study show that governments' support for in-home child care crosses the contested domestic sphere, which, in turn, blurs the line between the informal/formal domains and public/private responsibility for care. If governments increase spending to support in-home child care, and ECEC more broadly, the details of the funding and regulation is critical. Although many government reforms are put forward to support positive choices for parents, these policies must also consider whether there are positive outcomes for care workers and children (though, as noted, the detailed analysis of the impacts of in-home care upon children are outside the scope of this thesis). The findings from the thesis showed that policy to address the needs (and choices) of working parents can have negative implications for the care workers. In particular, public responsibility for care has shifted toward the private domain (and sometimes informal provision); responsibility is also divided unequally across gender, class and racial lines. The division of these responsibilities is partly explained by structural policy changes, but more so by embedded care cultures about appropriate forms of care for young children. To varying extents in each country, these assumptions reflect the undervaluing of care and domestic work as a productive contribution in its own right. Instead, it is perceived as a way to promote productivity through mothers' employment in the knowledge economy.

Lessons and considerations for in-home child care policy

This research focused on in-home child care as a form of ECEC; however it shed new light on this form of care through the consideration of migration policy in three liberal countries. These two bodies of research (ECEC and migrant domestic work) centre on different policy issues, and current policy debates and recommendations often fail to consider issues associated with the other policy area. For example, in Australia, pressures to subsidise in-home child care through ECEC funding give little attention to what this might mean for migrant care workers who provide in-home child care as *au pair*s under the Working Holiday Visa. To what extent should ECEC legislation regulate and monitor in-home child care arrangements that are facilitated by migration policy? In the UK and Canada, migration policy intersects with care policy to promote different forms of informal and private in-home child care arrangements. Critique from the migration sphere relates to the working conditions and status of the care workers (Arat-Koç, 1989; Bakan & Stasiulis, 1997; Brickner & Straehle, 2010; Cox, 2012; Newcombe, 2004). Still, though, there is little attention given to what this means for the quality of care for children. As Burikova and Miller point out in relation to the hiring of untrained *au pair*s in the UK,

> Although it was said by some that they didn't want untrained *au pair*s looking after their very young children, the idea that the way they treated their *au pair* would or could rebound upon their own children seems to be both unspoken and apparently an afterthought. This is one of the most striking conclusions of our research. After all, one might have expected that parents, devoted to the welfare of their children, are already, in choosing to have an *au pair*, opting for essentially untrained childcare. But at least they could help ensure a positive attitude toward their children by their own positive treatment of the *au pair*. After all, if they treat their *au pair* badly, how should they expect the *au pair* in turn to treat their children when they are alone with them – especially if the children are very young and unable to report back to their parents any ill-treatment? (Búriková & Miller, 2010).

This excerpt is written in relation to individuals' decisions to hire untrained *au pair*s, and their 'striking finding' is that many parents did not associate their own treatment of *au pair*s with the care their young children receive from the *au pair*. This finding can easily be applied to the way we, as individuals and society, treat care workers – enacted through care and migration policy and broader care cultures. There is consensus across

most developed countries that spending on children's education is a worthy investment and, also, that women should have a right to earn. And, as discussed throughout, governments increasingly promote women's participation in employment as a precondition for eligibility for child care subsidies and other welfare benefits. As a result, governments and the public do increasingly recognise in policy rhetoric and advocacy campaigns that affordable ECEC is necessary for maternal employment. As outlined in the Introduction, maternal employment is promoted by governments as a valuable contribution to tax revenue and productivity. We, as individuals and society, must also then recognise the value of the care work that facilitates this participation in the knowledge economy. This involves proper remuneration, fair working conditions, and investment in the care worker's skills and knowledge. This should be regarded as a right for the care workers, and also a right for the children being cared for. While workers' rights have long been advocated in the ECEC field, in-home child care is often ignored in these debates when, in practice, they are often the most vulnerable and affected by competing and contrasting policy domains.

Assuming that in-home child care is here to stay as a necessary form of care for the 'modern economy', what can be done to improve the outcomes of policy for parents, children and care workers? How can in-home child care policy be reformed or restructured to improve the affordability for parents, the quality of care for all children and the quality of work for caregivers? Drawing from the findings from this study, three preliminary issues for policy consideration for in-home child care are presented below. It should be emphasised that further research, including consultation with the multiple stakeholders involved, is required to provide country-specific recommendations.

1. *Employment status of in-home child care workers*

In-home child care is provided more effectively and equitably when care workers are employed by service organisations, not families. The approach to delivering in-home child care differs from national policy and practice in the three countries included in the study, where most in-home child care workers are self-employed (Canada, UK) or independent contractors (Australia). There is greater risk for these workers because they do not have control of their environment and often don't have the resources to provide high quality care to the children in their care. However, it should be noted that there are

local examples of in-home child care in Australia and the UK that operate under a model which is able to protect the working conditions of care workers, provide training and more equitable arrangements for families and employees. These services are able to provide high quality in-home child care to families across income levels, assure the quality of care provided to children and monitor the conditions for the care worker.

Examples of good practice in Australia and the UK (discussed in Chapters 5 and 8) support a move toward in-home care workers being employed by provider organisations, rather than directly by families[42]. These findings were supported by evidence from studies in Australia (Meagher, 1997, 2000), the UK (Búriková & Miller, 2010; Busch, 2013; Cox, 2006, 2011; Newcombe, 2004; Williams & Gavanas, 2008) and Canada (Bakan & Stasiulis, 1997; Pratt, 2003), which have found the potential for exploitation when care workers are employed by families to work in the home.

Related to this, interviews with key stakeholders indicated that many families needing in-home child care only require part-time hours (a day or two each week, for example, or wrap-around hours each day). Enabling parents to access in-home child care through centre-based or home-based services and organisations has the potential to increase the flexibility in their child care arrangements, and also improves the accountability for the family.

This would mean that fees for services would be paid to the service organisations and, if eligible for subsidies, families would pay a reduced fee to the service provider based on their income By being employed by service provider organisations, in-home child care workers would have the right to join a union and have representation across the broader ECEC workforce.

---

[42] Practice examples and support for this approach were held by a number of key stakeholders (Nanny associations and provider organisations) in Australia and the UK (Australia-07, Australia-08; Australia-13; Australia-20; UK-12; UK-13; UK-16; UK-17; UK-20)

2. Link subsidies to regulated and monitored in-home child care

Public subsidies should flow to *quality* ECEC services. Financial assistance for families using in-home child care should be contingent on standards and monitoring procedures consistent with other forms of approved ECEC. This would mean providing training programs equivalent to the minimum qualification standards required in centre- and home-based settings. Regulation and training in these three countries is in flux and generally regarded as fairly low and, therefore, further consultation with experts and the sector is needed. Training and qualifications specific to in-home child care provision could also be considered. This would be consistent with the direction of some nanny agency training in the UK and Australia. The training and regulation of in-home child care workers will have a positive impact on the wages and conditions to improve their status in line with the rest of the ECEC workforce, and therefore also ensure mechanisms are in place to deliver quality ECEC to children and families.

Directing subsidies to regulated ECEC arrangements, where care workers have minimum qualifications, ensures greater accountability of public funding. Further consideration also needs to be given to the way public funding for in-home child care affects families across different income levels. As the analysis in Chapters 5 and 7 indicated, current funding measures in Canada and the UK provide little assistance to low-income families requiring this type of care. Australia's In Home Care program provides targeted assistance to the most vulnerable families and to those working non-standard and precarious hours. It is recommended that funding structures for ECEC ensure that all families requiring in-home child care for employment or other circumstances do not face substantial cost barriers to access such a service. Stakeholders in Australia (Australia-07; Australia-11; Australia-20) and the UK (UK-12; UK-16; UK-17; UK-19) provided good practice examples of funding structures that assisted low-income families to be able to access and afford flexible care to meet their employment and family needs. Overall, linking subsidies to regulated in-home child care can help to ensure that wages are based to a standard that reflects care workers' qualifications and experiences, rather than families' ability to pay.

3. Employment of migrant in-home care workers

Across Western countries, in-home child care is increasingly provided by migrant women who are typically required to have only minimal (if any) training as ECEC workers, and have few protections as migrant workers. International experience shows the strong possibility of such arrangements resulting in the exploitation of care workers. The rights and working conditions of in-home carers need to be protected, through national legislation that protects their social rights as citizens and workers. Various national and international organisations (such as Kalaayan in the UK, INTERCEDE in Canada, and the ILO Convention on Domestic Workers) advocate around these issues, including their rights to join a union and to remove conditions that make their working and citizenship rights tied to their employment. By making care workers visible and by ensuring they have a voice and are represented is a necessary step to valuing their care work. We know that providing better conditions for care workers can also have positive impacts for the quality of care provided to children. This policy consideration should be viewed in combination with consideration 2, to ensure that carers have appropriate training, qualifications and support to promote the development and learning of children according to national ECEC standards and curriculum.

Gaps & further research

The research presented in this thesis took a broad institutional approach to comparative analysis of a specific policy area – in-home child care. It considered the political, social, demographic, discursive and cultural context of in-home child care over time and across three liberal countries. To do this, it drew on theories of institutionalism and comparative welfare regimes. Using both secondary sources and data from interviews with key stakeholders the research sought to better understand broad policy changes and restructuring that affects the demand and supply of in-home child care, and it did so within a structural and normative framework. This approach produced rich data and filled a gap in ECEC policy research and research on domestic care work and migrant labour. In particular, it contributed to scholarly research about issues of gender, class and race associated with the debates and outcomes of in-home child care policy. It also proposed that these inequalities and cross-national differences can be explained by assumptions about the most appropriate care for children, which are embedded in

historical and cultural norms. Together, these structural and normative aspects are reflective of different care cultures.

While these findings are useful for identifying examples of best practice for government support for in-home child care, further research is necessary to explore how these e could be adopted and adapted in different national and local contexts. The analysis undertaken in Chapters 6 and 7 identified two broad groups that are affected by in-home child care policy – families (parents and children) and care workers. It is therefore important that their views and experiences are sought and examined in relation to specific care cultures. For example, what do in-home child care workers think about the government's involvement in policy and the resulting informalisation and/or professionalisation of their work? Do the concerns and issues raised by care workers differ by country? Or by race/migration status? From the family perspective, what type of support (funding/regulation) is most important for the provision of in-home child care? What are families' expectations about government support? And how does this differ by family characteristics? Does this differ across countries?

The findings from this research study can contribute to the development of further research that gives greater attention to how meso-level structures shape families' and care workers' perspectives of in-home child care and their aspirations for policy reform and improvement of the in-home child care workforce. By giving greater attention to the structural and normative factors that shape care workers and families' ideas about care for young children, policy can be developed to better recognise the value of in-home care workers and the needs of the families and children they provide care for.

References

ABC News. (2013). Federal inquiry set up into child care, early learning accessibility. http://www.abc.net.au/news/2013-11-17/government-establishes-productivity-commission-into-childcare/5097480

Adamson, E., & Brennan, D. (2014). Social Investment or Private Profit? Diverging Notions of 'Investment'in Early Childhood Education and Care. *International Journal of Early Childhood, 46*(1), 47-61.

Arat-Koç, S. (1989). In the Privacy of Our Own Home: Foreign Domestic Workers as Solution to the Crisis of the Domestic Sphere in Canada. *Studies in Political Economy, 28*, 33-58.

Arat-Koç, S. (1999). Neo-liberalism, state restructuring and immigration: Changes in Canadian policies in the 1990s. *Journal of Canadian Studies/Revue d'Études canadiennes, 34*(2), 31-56.

Arat-Koç, S. (2012). Invisibilized, Individualized, and Culturalized: Paradoxical Invisibility and Hyper-Visibility of Gender in Policy Making and Policy Discourse in Neoliberal Canada. *Canadian Woman Studies, 29*(3), 6-17.

Au Pair World. (2014). How to become an au pair in Australia. Retrieved 21 May, 2014, from http://www.aupair-world.net/au_pair_program/australia/au_pair/visa

Australian Bureau of Statistics. (2008). Childhood Education and Care. In Australian Bureau of Statistics (Ed.), *Cat. 4402.0*. Canberra: Commonwealth of Australia.

Australian Bureau of Statistics. (2009). Work, life and family balance *ABS Australian Social Trends* (Vol. 4102.0).

Australian Bureau of Statistics. (2011). Childhood Education and Care *4202.0*. Canberra: Australian Bureau of Statistics.

Australian Government. (2009). *The Early Years Learning Framework*. Canberra: Commonwealth of Australia.

Australian Government. (2013). Government announces productivity commission inquiry to focus on more flexible, affordable and accessible child care. Retrieved 12 December 2013, from http://www.pm.gov.au/media/2013-11-17/government-announces-productivity-commission-inquiry-focus-more-flexible-affordable

Australian Nanny Association. (2013). About Us. Retrieved 30 June 2014, from http://www.australiannannyassociation.org/#!about_us/csgz

Australian Nanny Association. (2014). Submission to the Productivity Commission Inquiry into Child Care and Early Childhood Learning.

Australian Women Chamber of Commerce & Industry. (2013). Closing the Gap on Child Care in Australia: An issues paper on how to strategically increase Australia's national productivity: Australian Women Chamber of Commerce & Industry.

Bacchi, C. (1999). *Women, policy and politics: The construction of policy problems*. London: Sage Publications, Inc.

Bacchi, C. (2000). Policy as discourse: What does it mean? Where does it get us? *Discourse, 21*(1), 45-57.

Bacchi, C. (2005). Discourse, discourse everywhere: Subject "agency" in feminist discourse methodology. *Nordic journal of women's studies, 13*(03), 198-209.

Bacchi, C. (2009). *Analysing policy: What's the problem represented to be?* Sydney: Pearson Education Australia.

Bakan, A. B., & Stasiulis, D. (1994). Foreign domestic worker policy in Canada and the social boundaries of modern citizenship. *Science & Society, 58*(1), 7-33.

Bakan, A. B., & Stasiulis, D. (1997). *Not one of the family: Foreign domestic workers in Canada*. Toronto: University of Toronto Press.

Baker, M. (2000). New employment policies, poverty and mothering. *Family Matters*(55), 46-51.

Baker, M. (2006). *Restructuring family policies: convergences and divergences*. Toronto: University of Toronto Press.

Baker, M., & Tippin, D. (1998). Fighting 'child poverty': the discourse of restructuring in Canada and Australia. *Australian Canadian Studies, 17*(2), 121-140.

Ball, S. J., & Vincent, C. (2005). The 'childcare champion'? New Labour, social justice and the childcare market. *British Educational Research Journal, 31*(5), 557-570.

Barnes, M., Bryson, C., & Smith, R. (2006). Working atypical hours: What happens to family life. London: National Centre for Social Research.

Baxter, J. (2013). Child care participation and maternal employment trends in Australia (Research Report No. 26). Melbourne: Australian Institute of Family Studies.

Baxter, J. (2014). Maternal Employment and Childcare in Australia *Submission to the Productivity Commission Childcare and Early Childhood Learning Inquiry*. Melbourne: Australian Institute of Family Studies.

Beach, J., Friendly, M., Ferns, C., Prabhu, N., & Forer, B. (2009). *Early Childhood Education and Care in Canada 2008*. Toronto: Childcare Resource and Research Unit.

Béland, D. (2005). Ideas and social policy: an institutionalist perspective. *Social Policy & Administration, 39*(1), 1-18.

Béland, D. (2009a). Gender, Ideational Analysis, and Social Policy. *Social Politics: International Studies in Gender, State & Society, 16*(4), 558-581. doi: 10.1093/sp/jxp017

Béland, D. (2009b). Ideas, institutions, and policy change. *Journal of European Public Policy, 16*(5), 701-718.

Béland, D., & Cox, R. H. (2011). *Ideas and politics in social science research*. New York: Oxford Univiversity Press.

Bennett, J. (2008). Early childhood services in the OECD countries: Review of the literature and current policy in the early childhood field *Innocenti Working Papers*. Florence: UNICEF.

Bertrand, J., Bernhard, J., Blaxall, J., Burning Fields, J., Gordon, M., Goulet, M., . . . Zimanyi, L. (2007). Early learning for every child today: a framework for Ontario early childhood settings *Best Start Expert Panel on Early Learning*. Toronto: Ontario Government.

Better Regulation Task Force. (1998). *Early education and day care review*. London: Cabinet Office, Better Regulation Task Force Retrieved from http://dera.ioe.ac.uk/6575/1/early_ed.pdf.

Bettio, F., & Plantenga, J. (2004). Comparing care regimes in Europe. *Feminist economics, 10*(1), 85-113.

Bird, F. (1970). *Report of the Royal Commission on the Status of Women in Canada*: Minister of Supply and Services Canada.

Bittman, M., Matheson, G., & Meagher, G. (1999). The Changing Boundary between Home and Market: Australian Trends in Outsourcing Domestic Labour. *Work, Employment & Society, 13*(2), 249-273. doi: 10.1177/09500179922117935

Black, A. J. (1998). *The politics of motherhood in post-war Britain: Feminism, socialism and the Labour party.* (M.A. MQ36345), Dalhousie University (Canada), Canada. Retrieved from http://proquest.umi.com/pqdweb?did=734123331&Fmt=7&clientId=25620&RQT=309&VName=PQD

Blank, R. M. (2000). When can public policy makers rely on private markets? The effective provision of social services. *The Economic Journal, 110*(462), 34-49.

Bonoli, G. (2005). The politics of the new social policies: providing coverage against new social risks in mature welfare states. *Policy & Politics, 33*(3), 431-449.

Bonoli, G., & Reber, F. (2010). The political economy of childcare in OECD countries: Explaining cross-national variation in spending and coverage rates. *European Journal of Political Research, 49*(1), 97-118.

Bourke, L. (2004). Budget: Behold the pro-nanny state. *citywire money*. http://citywire.co.uk/money/budget-behold-the-pro-nanny-state/a256034

Bown, K., Sumsion, J., & Press, F. (2009). Influences on Politicians' Decision Making for Early Childhood Education and Care Policy: what do we know? What don't we know? *Contemporary Issues in Early Childhood, 10*(3), 194-217.

Brennan, D. (1998). *The politics of Australian child care: Philanthropy to feminism and beyond*. Cambridge: Cambridge University Press.

Brennan, D. (2002). Australia: Child Care and State-Centred Feminism in a Liberal Welfare Regime. In S. Michel & R. Mahon (Eds.), *Child care policy at the crossroads: gender and welfare state restructuring* (pp. 95-112). London: Routledge.

Brennan, D. (2007). The ABC of Child Care Politics. *Australian Journal of Social Issues, 42*(2), 213-225.

Brennan, D., & Adamson, E. (2012). Early Childhood Education and Care Policy. In J. M. Bowes, R. Grace & K. Hodges (Eds.), *Children, families and communities: Contexts and consequences* (Vol. 4, pp. 255-270). Melbourne, Australia: Oxford University Press.

Brennan, D., Cass, B., Himmelweit, S., & Szebehely, M. (2012). The marketisation of care: Rationales and consequences in Nordic and liberal care regimes. *Journal of European Social Policy, 22*(4), 377-391. doi: 10.1177/0958928712449772

Brennan, D., & Mahon, R. (2011). State Structures and The Politics of Child Care. *Politics & Gender, 7*(2), 286-293. doi: doi:10.1017/S1743923X11000134

Brennan, D., & O'Donnell, C. (1986). Caring for Australia's children: Political and industrial issues in child care: Allen & Unwin.

Brennan, D., & Oloman, M. (2009). Child care in Australia: A market failure and spectacular public policy disaster *Our Schools/Ourselves* (Vol. Spring 2009). Ottawa: Canadian Centre for Policy Alternatives.

Brickner, R. K., & Straehle, C. (2010). The missing link: Gender, immigration policy and the Live-in Caregiver Program in Canada. *Policy and Society, 29*(4), 309-320. doi: http://dx.doi.org/10.1016/j.polsoc.2010.09.004

Brind, R., Norden, O., McGinigal, S., Oseman, D., Simon, A., & La Valle, I. (2011). *Childcare and Early Years Providers Survey 2011.* London: Department for Education.

Bryant, L. (2013, 19 November). Quality childcare creates manifold economic benefits for Australia, *Sydney Morning Herald,*. Retrieved from

http://www.smh.com.au/comment/quality-childcare-creates-manifold-economic-benefits-for-australia-20131118-2xr3w.html#ixzz30WFDly7v

Bryson, C., Brewer, M., Sibieta, L., & Butt, S. (2012). The role of informal childcare: A synthesis and critical review of the evidence: Full Report. London: Nuffield Foundation.

Budig, M. J., Misra, J., & Boeckmann, I. (2012). The Motherhood Penalty in Cross-National Perspective: The Importance of Work–Family Policies and Cultural Attitudes. *Social Politics: International Studies in Gender, State & Society, 19*(2), 163-193. doi: 10.1093/sp/jxs006

Búriková, Z., & Miller, D. (2010). *Au pair*. Cambridge: Polity.

Busch, N. (2012). Deprofessionalisation and Informality in the Market for Commoditised Care. *Transnational Migration, Gender and Rights (Advances in Ecopolitics), 10*, 53-75.

Busch, N. (2013). The employment of migrant nannies in the UK: negotiating social class in an open market for commoditised in-home care. *Social & Cultural Geography, 14*(5), 541-557.

Bushnik, T. (2006). *Child care in Canada*. Ottawa: Statistics Canada.

Cameron, C. (2002). An historical perspective on changing child care policy. In J. Brannen & P. Moss (Eds.), *Rethinking children's care* (pp. 80-95). Bickingham: Open University Press.

Canadian Council on Learning. (2009). 2008 Survey of Canadian Attitudes toward Learning. Ottawa: Canadian Council on Learning.

Cassells, R., McNamara, J., Lloyd, R., & Harding, A. (2007). Child Care Affordability and Availability. *Agenda: A Journal of Policy Analysis and Reform, 14*(2), 123-139.

Castles, F. G. (1998). *Comparative public policy: Patterns of post-war transformation*: Edward Elgar Publishing.

Castles, F. G., & Pierson, C. (1996). A new convergence? Recent policy developments in the United Kingdom, Australia and New Zealand. *Policy & Politics, 24*(3), 233-245.

Child Care Human Resources Sector Council. (2010). Gathering Labour Market Information on Canada's Early Childhood Education and Care (ECEC) Workforce: Data collection methods and classification systems. Ottawa: Child Care Human Resources Sector Council.

Childcare Resource and Research Unit. (2013). Characteristics of unregulated child care by province *Briefing Notes*. Toronto: Childcare Resource and Research Unit.

Cho, K. (Writer). (2013). The Status Quo? Unfinished Business of Feminism in Canada: National Film Board of Canada.

Claassen, R. (2011). The Commodification of Care. *Hypatia, 26*(1), 43-64.

Clasen, J., & Siegel, N. (Eds.). (2007). *Investigating welfare state change: the'dependent variable problem'in comparative analysis*. Cheltenham: Edward Elgar Publishing.

Cleveland, G., Forer, B., Hyatt, D., Japel, C., & Krashinsky, M. (2008). New evidence about child care in Canada: Use patterns, affordability and quality *IRPP Choices* (Vol. 14). Montreal: Institute for Research on Public Policy.

Cleveland, G., & Krashinsky, M. (1998). The Benefits and Costs of Good Child Care. *The Economic Rationale for Public Investment in Young Children–A Policy Study, University of Toronto at Scarborough*.

Cleveland, G., & Krashinsky, M. (2003). Financing ECEC services in OECD countries. In OECD (Ed.), *The Childcare Transition: A league table of early childhood education and care in economically advanced countries*. Paris.

Cleveland, G., & Krashinsky, M. (2009). The nonprofit advantage: Producing quality in thick and thin child care markets. *Journal of Policy Analysis and Management, 28*(3), 440-462.

Cleveland, G., & Krashinsky, M. (Eds.). (2001). *Our children's future: child care policy in Canada*. Toronto: University of Toronto Press.

Cohen, B. (1993). The United Kingdom. In M. Cochran (Ed.), *International Handbook of Child Care Policies and Programs* (pp. 515-534). London: Greenwood Press.

Cook, K., Davis, E., Williamson, L., Harrison, L., & Sims, M. (2013). Discourses of professionalism in family day care. *Contemporary Issues in Early Childhood, 14*(2), 112-126.

Coote, A., & Campbell, B. (1987). *Sweet Freedom: The struggle for women's liberation*. Oxford: Blackwell.

Council of Australian Governments. (2009). *Investing in the Early Years - A National Early Childhood Development Strategy*. Canberra: Commonwealth of Australia.

Cox, R. (2000). Exploring the Growth of Paid Domestic Labour: A Case Study of London. *Geography, 85*(3), 241-251.

Cox, R. (2006). The servant problem: domestic employment in a global economy. London: IB Tauris.

Cox, R. (2011). Competitive mothering and delegated care: class relationships in nanny and au pair employment. *Studies in the Maternal, 3*(2).

Cox, R. (2012). Gendered work and migration regimes. *Transnational Migration, Gender and Rights (Advances in Ecopolitics, Volume 10), Emerald Group Publishing Limited, 10*, 33-52.

Daenzer, P. (1997). An Affair between Nations: International Relations and the Movement of Household Service Workers. In A. B. Bakan & D. Stasiulis (Eds.), *Not one of the family: foreign domestic workers in Canada* (pp. 81-117). Toronto: University of Toronto Press.

Daly, M., & Lewis, J. (2000). The concept of social care and the analysis of contemporary welfare states. *The British journal of sociology, 51*(2), 281-298.

Davis, L. (1983). Now You See It, Now You Don't: The Restructuring of Commonwealth Government Child Care Policy, 1972-1982. *Journal of Sociology, 19*(1), 79-95.

Department for Education, & Department of Health. (2012). *Supporting Families in the Foundation Years*. London: Department of Education.

Department for Education (UK). (2003). *Every Child Matters*. London: HM Treasury.

Department for Education (UK). (2014). *Childcare and early years survey of parents 2012-2013*. London.

Department for Education and Skills. (2002). *Supporting the cost of home-based childcare: A proposal to approve home childcarers, and so enable parents to access the childcare tax credit element of the Working Tax Credit*. London.

Department for Education and Skills. (2004). Childcare: extending protection and broadening support *Proposals for a voluntary scheme for the approval of childcare not required to be registered by Ofsted*. London.

Dial-An-Angel. (2014). Childcare and Early Childhood Learning *Submission to Productivity Commission inquiry into Childcare and Early Childhood Learning*.

Dobrowolsky, A. (2002). Rhetoric Versus Reality: The Figure of the Child and New Labour's Strategic" Social Investment State". *Studies in Political Economy, 69*(0), 43-73.

Dobrowolsky, A., & Jenson, J. (2004). Shifting representations of citizenship: Canadian politics of "women" and "children". *Social Politics: International Studies in Gender, State & Society, 11*(2), 154-180.

Dobrowolsky, A., & Jenson, J. (2005). Social investment perspectives and practices: a decade in British politics. *Social Policy Review, 17*, 203-230.

Dobrowolsky, A., & Lister, R. (2006). Social Exclusion and Changes to Citizenship: Women and Children, Minorities and Migrants in Britain. In E. Tastsoglou & A. Dobrowolsky (Eds.), *Women, Migration and Citizenshi: Making Local, National and Transnational Connections*. Hampshire: Ashgate.

Doherty, G. (2007). *Ensuring the best start in life: Targeting versus universality in early childhood development*. Montreal: Institute for Research on Public Policy.

Duffy, M. (2005). Reproducing Labor Inequalities Challenges for Feminists Conceptualizing Care at the Intersections of Gender, Race, and Class. *Gender & Society, 19*(1), 66-82.

Duncan, S. (1995). Theorizing European gender systems. *Journal of European Social Policy, 5*(4), 263-284. doi: 10.1177/095892879500500401

Duncan, S. (1996). Lone mothers and paid work: Neighborhoods, local labor markets, and welfare state regimes. *Social Politics: International Studies in Gender, State & Society, 3*(2-3), 195-222.

Duncan, S. (1999). *Comparative research: The case of genderfare*. Paper presented at the CAVA Workshop.

Duncan, S. (2005). Mothering, class and rationality. *The Sociological Review, 53*(1), 50-76.

Duncan, S., & Edwards, R. (1997). Lone mothers and paid work-rational economic man or gendered moral rationalities? *Feminist economics, 3*(2), 29-61.

Duncan, S., Edwards, R., Reynolds, T., & Alldred, P. (2004). Mothers and child care: Policies, values and theories. *Children & society, 18*(4), 254-265.

Duncan, S., & Irwin, S. (2004). The social patterning of values and rationalities: mothers' choices in combining caring and employment. *Social Policy and Society, 3*(4), 391-399.

Education Employment and Workplace Relations References Committee. (2009). *Senate inquiry into the provision of childcare*. Canberra: Senate Printing House.

Environics Research Group Limited. (2006). Attitudes Toward Child Care *Prepared for the Child Care Advocacy Association of Canada*. Ottawa: Environics Research Group Ltd.

Esping-Andersen, G. (1990). *The three worlds of welfare capitalism* (Vol. 6). Cambridge: Polity Press

Esping-Andersen, G. (2002). A Child-Centred Social Investment Strategy. In G. Esping-Andersen (Ed.), *Why We Need a New Welfare State* (Vol. 1, pp. 26-68). Oxford: Oxford University Press.

Evans, M., & Kelley, J. (2002). Attitudes towards childcare in Australia. *Australian Economic Review, 35*(2), 188-196.

Fair Work Ombudsman. (2014). Awards. Retrieved 18 November, 2014, from http://www.fairwork.gov.au/awards-and-agreements/awards

Fairclough, N. (2002). Critical discourse analysis as a method in social scientific research. In R. Wodak & M. Meyer (Eds.), *Methods of critical discourse analysis* (Vol. 1, pp. 121-137). London: Sage.

Fawcett, B., Featherstone, B., & Goddard, J. (2004). *Contemporary child care policy and practice*. New York: Palgrave Macmillan.

Ferns, C., & Friendly, M. (2014). The state of early childhood education and care in Canada 2012. In C. f. W. (a joint initiative of the Childcare Resource and Research Unit, Families and Well-Being at the University of Guelph, and the Department of Sociology at the University of Manitoba), (Ed.), *Moving Child Care Forward Project*. Toronto: Movingchildcareforward.ca.

Finch, J. (1984). The deceit of self-help: Preschool playgroups and working class mothers. *Journal of Social Policy, 13*(1), 1-20.

Fitzgerald, J. (2006). *Lobbying in Australia: You can't expect anything to change if you don't speak up!* : Rosenberg Publishing.

Fraser, N. (1989). Talking about Needs: Interpretive Contests as Political Conflicts in Welfare-State Societies. *Ethics, 99*(2), 291-313.

Fraser, N. (1994). After the family wage: Gender equity and the welfare state. *Political Theory, 22*(4), 591-618.

Fraser, N. (2005). Mapping the Feminist Imagination:From Redistribution to Recognition to Representation. *Constellations, 12*(3), 295-307. doi: 10.1111/j.1351-0487.2005.00418.x

Friendly, M. (2000). Child care and Canadian federalism in the 1990s: Canary in a coal mine *Occasional Paper* (Vol. 11). Toronto: Child Care Resource and Research Unit.

Friendly, M. (2004). Strengthening Canada's social and economic foundations: next steps for early childhood education and child care *Options Politique* (pp. 46).

Friendly, M., Halfon, S., Beach, J., & Forer, B. (2013). Early childhood education and care in Canada 2012. Toronto: Child Care Research and Resource Unit.

Friendly, M., & Prentice, S. (2009). *About Canada: Childcare*. Winnipeg: Fernwood Publishing.

Friendly, M., & Rothman, L. (1995). Miles to go ... the policy context of child care in Canada. *Child Welfare, 74*(3).

Fudge, J. (1997). Little Victories and Big Defeats: The Rise and Fall of Collective Bargaining Rights for Domestic Workers in Ontario. In A. B. Bakan & D. Stasiulis (Eds.), *Not one of the family: foreign domestic workers in Canada* (pp. 119-145). Toronto: University of Toronto Press.

Fudge, J. (2011). Global Care Chains, Employment Agencies, and the Conundrum of Jurisdiction: Decent Work for Domestic Workers in Canada. *Canadian Journal of Women and the Law/Revue Femmes et Droit, 23*(1), 235-264.

Fudge, J. (2013). *Women Workers: Is Equality Enough?* Paper presented at the feminists@ law, Kent, UK.

Garvis, S., & Pendergast, D. (2013). Perceptions of rebates for nanny care: An analysis of an online discussion. *Australasian Journal of Early Childhood, 38*(3), 105-111.

Gathorne-Hardy, J. (1972). The Rise and Fall of the English Nanny: London: Arrow Books.

Gaunt, C. (2013). Government extends tax-free childcare to more families. *NurseryWorld*. http://www.nurseryworld.co.uk/nursery-world/news/1106667/government-extends-tax-free-childcare-families

Ghalam, N. Z. (1997). Attitudes toward women, work and family. *Canadian social trends, 46*, 13-17.

Giddens, A. (1998). *The third way: The renewal of social democracy*. Cambridge: Polity.

Gilliland, J. (2012). *Permanent Worker, Temporary Resident: Media Representations of Canada's Live-In Caregiver Program.* (MA), University of Victoria, Victoria.

Globe and Mail. (2013, 18 October 2013). Vote: Should canada have a universal daycare system?, *The Globe and Mail*. Retrieved from http://www.theglobeandmail.com/life/parenting/vote-are-you-happy-with-the-state-of-childcare-in-canada/article14926139/

Goodfellow, J. (2005). Market childcare: preliminary considerations of a 'property view' of the child. *Contemporary Issues in Early Childhood, 6*(1), 54-65.

Government of Ontario. (2008). *Ontario Works Policy Directives*. Toronto: Retrieved from http://www.mcss.gov.on.ca/documents/en/mcss/social/directives/ow/0101.pdf; http://www.mcss.gov.on.ca/documents/en/mcss/social/directives/ow/0807.pdf.

Government of Ontario. (2010). *Ontario Works Directives: Child Care Supports*. Toronto: Retrieved from http://www.mcss.gov.on.ca/documents/en/mcss/social/directives/ow/0807.pdf.

Graham, H. (1991). The Concept of Caring in Feminist Research: The Case of Domestic Service. *Sociology, 25*(1), 61-78. doi: 10.1177/0038038591025001004

Graham, H. (1993). Social divisions in caring. *Women's Studies International Forum, 16*(5), 461-470.

Greener, I. (2008). Markets in the public sector: when do they work, and what do we do when they don't? *Policy & Politics, 36*(1), 93-108.

Gregson, N., & Lowe, M. (1994). *Servicing the middle classes: class, gender and waged domestic labour in contemporary Britain*. London: Routledge.

Hakim, C. (2000). *Work-lifestyle choices in the 21st century: Preference theory*. New York: Oxford University Press.

Hall, P. A. (1989). *The political power of economic ideas: Keynesianism across nations*. Princeton: Princeton University Press.

Hall, P. A. (1993). Policy Paradigms, Social Learning, and the State: The Case of Economic Policymaking in Britain. *Comparative Politics, 25*(3), 275-296.

Hall, P. A., & Taylor, R. C. R. (1996). Political Science and the Three New Institutionalisms*. *Political Studies, 44*(5), 936-957. doi: 10.1111/j.1467-9248.1996.tb00343.x

Hall, P. A., & Taylor, R. C. R. (1998). The Potential of Historical Institutionalism: a Response to Hay and Wincott. *Political Studies, 46*(5), 958-962. doi: 10.1111/1467-9248.00178

Hand, K. (2005). Mothers' views on using formal child care. *Family Matters, 70*, 10-17.

Hantrais, L. (1999). Contextualization in cross-national comparative research. *International Journal of Social Research Methodology, 2*(2), 93-108. doi: 10.1080/136455799295078

Hantrais, L. (2004). *Family policy matters: responding to family change in Europe*. Bristol: Policy Press.

Harder, L. (2004). Child Care, Taxation and Normative Commitments: Excavating the Child Care Expense Deduction Debate. *Studies in Political Economy, 73*, 89-109.

Harwood, D., Klopper, A., Osanyin, A., & Vanderlee, M. L. (2012). 'It's more than care': early childhood educators' concepts of professionalism. *Early Years, 33*(1), 4-17. doi: 10.1080/09575146.2012.667394

Hay, C., & Wincott, D. (1998). Structure, Agency and Historical Institutionalism. *Political Studies, 46*(5), 951-957. doi: 10.1111/1467-9248.00177

Hayden, J. (1997). Caveat Australia? Child Care under a Neo-Conservative Agenda: A Canadian Example. *Australian Journal of Early Childhood, 22*(3), 1-6.

Heckman, J. (2006). Skill formation and the economics of investing in disadvantaged children. *Science, 312*(5782), 1900-1902.

Hill, E. (2006). Howard's 'Choice': The ideology and politics of work and family policy 1996–2006'. *Australian Review of Public Affairs, 23*, 1–8.

Himmelweit, S., & Sigala, M. (2004). Choice and the relationship between identities and behaviour for mothers with pre-school children: some implications for policy from a UK study. *Journal of Social Policy, 33*(03), 455-478.

HM Government. (2009). *Next Steps for Early Learning and Childcare: Building on the 10-year strategy (Summary)*. London: HM Government.

HM Revenue & Customs. (2013). *Paying for Childcare*. London: Retrieved from http://www.hmrc.gov.uk/leaflets/ir115.pdf.

HM Revenue & Customs. (2014). *A guide to Child Tax Credit and Working Tax Credit*. London: Retrieved from http://www.hmrc.gov.uk/leaflets/wtc5.pdf.

Hochschild, A. (2000). "The Global Nanny Chain ". *The American Prospect, 11*(4), 32-36.

Hodge, J. (2006). "Unskilled Labour": Canada's Live-in Caregiver Program. *undercurrent, 3*(2), 60-66.

Holloway, S., & Tamplin, S. (2001). Valuing Informal Childcare in the UK-September 2001 *Economic Trends* (Vol. 574). London: Office for National Statistics.

Hondagneu-Sotelo, P. (2007). *Domestica: Immigrant workers cleaning and caring in the shadows of affluence*. Oakland: University of California Press.

Human Resources and Skills Development Canada. (2013). Top occupational groups according to the number of temporary foreign worker positions on positive labour market opinions: Canada. from Government of Canada http://www.hrsdc.gc.ca/eng/jobs/foreign_workers/lmo_statistics/annual2012.shtml

Human Resources and Skills Development Canada, & Childcare Resource and Research Unit. (2012). Public Investments in Early Childhood Education and Care in Canada 2010. Ottawa: Human Resouces and Skills Development Canada.

Indonesia Institute. (2014). Submission to the Productivity Commission on the Childcare and Early Childhood Learning inquiry.

International Labour Office. (2011). Convention No. 189: Decent work for domestic workers. http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_161104.pdf

International Labour Organization. (2013). C189 - Domestic Workers Convention, 2011 (No. 189). *Information System on International Labour Standards.* Retrieved 26 June, 2014, from

http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:2551460:NO

Isaksen, L. W. (2011). *Global Care Work: Gender and Migration in Nordic Societies*. Lund: Nordic Academic Press.

Jacobs, K. (2006). Discourse Analysis. In M. Walter (Ed.), *Social Research Methods: An Australian Perspective*. Melbourne: Oxford University Press.

Jensen, C. (2009). Institutions and the politics of childcare services. *Journal of European Social Policy, 19*(1), 7-18.

Jenson, J. (1997). Who cares? Gender and welfare regimes. *Social Politics; Champaign, 4*(2), 182.

Jenson, J. (2004). Changing the paradigm: Family responsibility or investing in children. *The Canadian Journal of Sociology, 29*(2), 169-192.

Jenson, J. (2008). Children, new social risks and policy change. A LEGO™ future? *Comparative Social Research, 25*, 357-381.

Jenson, J. (2009). Lost in Translation: The Social Investment Perspective and Gender Equality. *Social Politics: International Studies in Gender, State & Society, 16*(4), 446-483.

Jenson, J., & Saint-Martin, D. (2003). New Routes to Social Cohesion? Citizenship and the Social Investment State. *The Canadian Journal of Sociology / Cahiers canadiens de sociologie, 28*(1), 77-99.

Jenson, J., & Sineau, M. (2001). *Who cares? Women's work, childcare, and welfare state redesign*. Toronto: University of Toronto Press.

Jones, A. (1987). Tensions in community care policy: The case of family day care. In P. Saunders & A. Jamrozik (Eds.), *SWRC Reports and Proceedings No 70* (pp. 87-106). Sydney: Social Welfare Research Centre (UNSW).

Jorgensen, M., & Phillips, L. (2002). *Discourse Analysis as Theory and Method*. London, UK: SAGE Publications Ltd.

Kalayaan. (2013a). Response to Draft Modern Slavery Bill. London: Kalayaan.

Kalayaan. (2013b). Slavery by another name: the tied migrant domestic worker visa. London: Kalayaan.

Kamerman, S. B. (2000). Early childhood education and care: an overview of developments in the OECD countries. *International Journal of Educational Research, 33*(1), 7-29. doi: Doi: 10.1016/s0883-0355(99)00041-5

Karvelas, P. (2012, 9 August). Regulation to allow subsidies for nannies a long way off, says Childcare Minister Kate Ellis, *The Australian*. Retrieved from http://www.theaustralian.com.au/national-affairs/regulation-to-allow-subsidies-for-nannies-a-long-way-off-says-childcare-minister-kate-ellis/story-fn59niix-1226446833517

Kelly, P., Astorga-Garcia, M., Esguerra, E., & Community Alliance for Social Justice. (2009). Explaining the deprofessionalised Filipino: Why Filipino immigrants get low-paying jobs in Toronto. In M. Ali (Ed.), *CERIS Working Paper No. 75*. Toronto: The Ontario Metropolis Centre.

Kelly, P., Park, S., de Leon, C., & Priest, J. (2011). Profile of Live-In Caregiver Immigrants to Canada 1993-2009 *TIEDI Analytical Report*. Toronto: Toronto Immigrant Employment Data Initiative,.

King, D. S., & Meagher, G. (2009). Introduction: Politics, profits and practices in child and aged care. In D. King & G. Meagher (Eds.), *Paid Care in Australia: Politics, profits and practices* (pp. 1-11). Sydney: Sydney University Press.

Knijn, T., & Kremer, M. (1997). Gender and the Caring Dimension of Welfare States: Toward Inclusive Citizenship. *Social Politics: International Studies in Gender, State & Society, 4*(3), 328-361.

Knijn, T., & Ostner, I. (2002). Commodification and de-commodification. In B. Hobson, J. Lewis & B. Siim (Eds.), *Contested concepts in gender and social politics* (pp. 141-170). Cheltenham: Edward Elgar.

Korpi, W. (2000). Faces of inequality: Gender, class, and patterns of inequalities in different types of welfare states. *Social Politics: International Studies in Gender, State & Society, 7*(2), 127-191.

Krahn, H. (1995). Non-standard work on the rise *Perspectives* (Vol. Winter, pp. 35-42). Ottawa: Statistics Canada.

Kremer, M. (2002). The Illustion of free choice: Ideals of care and child care policy in the Flemish and Dutch welfare states. In S. Michel & R. Mahon (Eds.), *Child care policy at the crossroads: Gender and welfare state restructuring*. New York: Routledge.

Kremer, M. (2006). The politics of ideals of care: Danish and Flemish child care policy compared. *Social Politics: International Studies in Gender, State & Society, 13*(2), 261-285.

Kremer, M. (2007). *How welfare states care: Culture, gender and parenting in Europe*. Amsterdam: Amsterdam University Press.

Land, H. (1978). Who cares for the family. *Journal of Social Policy, 7*(3), 257-284.

Land, H. (2002). Spheres of care in the UK: separate and unequal. *Critical social policy, 22*(1), 13-32.

Land, H., & Himmelweit, S. (2010). Who cares: who pays? London: UNISON.

Langford, R., Prentice, S., Albanese, P., Summers, B., Messina-Goertzen, B., & Richardson, B. (2013). Professionalization as an advocacy strategy: a content analysis of Canadian child care social movement organizations' 2008 discursive resources. *Early Years*, 1-16. doi: 10.1080/09575146.2013.789489

Larsen, C. A. (2008). The institutional logic of welfare attitudes. *Comparative Political Studies, 41*(2), 145-168.

Le Bihan, B., & Martin, C. (2004). Atypical Working Hours: Consequences for Childcare Arrangements. *Social Policy & Administration, 38*(6), 565-590. doi: 10.1111/j.1467-9515.2004.00408.x

LeBaron, G. (2010). The political economy of the household: Neoliberal restructuring, enclosures, and daily life. *Review of International Political Economy, 17*(5), 889-912. doi: 10.1080/09692290903573914

Lee, J., & Strachan, G. (1998). Who's minding the baby now? Child care under the Howard Government. *Labour and Industry, 9*(2), 81-101.

Leira, A. (2002). *Working parents and the welfare state: Family change and policy reform in Scandinavia*. Cambridge: Cambridge University Press.

Leira, A., & Saraceno, C. (2002). Care: actors, relationships and contexts. In B. Hobson, J. Lewis & B. Siim (Eds.), *Contested concepts in gender and social politics* (pp. 55-83). Cheltenham: Edward Elgar.

Leira, A., & Saraceno, C. (2006). Care: actors, relationships, contexts. *Contexts. Sosiologi I dag, 36*(3), 7-34.

Lewis, J. (1992). Gender and the development of welfare regimes. *Journal of European Social Policy, 2*(3), 159-173.

Lewis, J. (1997). Gender and Welfare Regimes: Further Thoughts. *Social Politics: International Studies in Gender, State & Society, 4*(2), 160-177. doi: 10.1093/sp/4.2.160

Lewis, J. (2003). Developing early years childcare in England, 1997–2002: the choices for (working) mothers. *Social Policy & Administration, 37*(3), 219-238.

Lewis, J. (2008). Childcare Policies and the Politics of Choice. *The Political Quarterly, 79*(4), 499-507.

Lewis, J. (2009). *Work-family balance, gender and policy*. Cheltenham: Edward Elgar Publishing.

Lewis, J. (2013a). Continuity and Change in English Childcare Policy 1960–2000. *Social Politics: International Studies in Gender, State & Society, 20*(3), 358-386. doi: 10.1093/sp/jxt013

Lewis, J. (2013b). The Failure to Expand Childcare Provision and to Develop a Comprehensive Childcare Policy in Britain during the 1960s and 1970s. *Twentieth Century British History, 24*(2), 249-274. doi: 10.1093/tcbh/hws011

Lewis, J., & Campbell, M. (2007a). UK work/family balance policies and gender equality, 1997–2005. *Social Politics: International Studies in Gender, State & Society, 14*(1), 4-30.

Lewis, J., & Campbell, M. (2007b). Work/Family Balance Policies in the UK since 1997: A New Departure? *Journal of Social Policy, 36*, 365-381.

Lewis, J., & Campbell, M. (2008). What's in a Name? 'Work and Family' or 'Work and Life' Balance Policies in the UK since 1997 and the Implications for the Pursuit of Gender Equality. *Social Policy & Administration, 42*(5), 524-541. doi: 10.1111/j.1467-9515.2008.00615.x

Lewis, J., Campbell, M., & Huerta, C. (2008). Patterns of paid and unpaid work in Western Europe: gender, commodification, preferences and the implications for policy. *Journal of European Social Policy, 18*(1), 21-37.

Lister, R. (2004). The third way's social investment state. In J. Lewis & R. Surender (Eds.), *Welfare state change. Towards a third way* (pp. 157-181). Oxford: Oxford University Press.

Lister, R. (2006). Children (but not women) first: New Labour, child welfare and gender. *Critical social policy, 26*(2), 315-335.

Lister, R. (2008). Investing in children and childhood: A new welfare policy paradigm and its implications. *Comparative Social Research, 25*, 383–408.

Lister, R., Williams, F., Anttonen, A., Bussemaker, S., Leira, A., Siim, B., . . . Gavanas, A. (2007). *Gendering Citizenship in Western Europe: new challenges for citizenship research in a cross-national context*. Bristol: Policy Press.

Lloyd, E. (2008). The Interface between Childcare, Family Support and Child Poverty Strategies Under New Labour: Tensions and Contradictions. *Social Policy and Society, 7*(4), 479-494. doi: doi:10.1017/S1474746408004442

Lloyd, E., & Hallett, E. (2010). Professionalising the Early Childhood Workforce in England: work in progress or missed opportunity? *Contemporary Issues in Early Childhood, 11*(1), 75-88.

Lloyd, E., & Penn, H. (2012). *Childcare markets: can they deliver an equitable service?* Bristol Policy Press.

Lowndes, V., & Roberts, M. (2013). *Why Institutions Matter: The New Institutionalism in Political Science*. London: Palgrave Macmillan.

Lyons, M. (2012). The Professionalization of Children's Services in Australia. *Journal of Sociology, 48*(2), 115-131.

MacDonald, C. L. (2010). *Shadow mothers: Nannies, au pairs, and the micropolitics of mothering*. Oakland: University of California Press.

Mackay, F., Kenny, M., & Chappell, L. (2010). New Institutionalism Through a Gender Lens: Towards a Feminist Institutionalism? *International Political Science Review, 31*(5), 573-588. doi: 10.1177/0192512110388788

Mahon, R. (2000). The never-ending story: The struggle for universal child care policy in the 1970s. *The Canadian Historical Review, 81*(4), 582-615.

Mahon, R. (2002). Child Care: Toward What Kind of "Social Europe"? *Social Politics: International Studies in Gender, State & Society, 9*(3), 343-379. doi: 10.1093/sp/9.3.343

Mahon, R. (2005). Child Care as Citizenship Right? Toronto in the 1970s and 1980s. *Canadian Historical Review, 86*(2), 285-316.

Mahon, R. (2006a). The OECD and the work/family reconciliation agenda: competing frames. In J. Lewis (Ed.), *Children, changing families and welfare states*. Cheltenham: Edgar Elgar Publishing.

Mahon, R. (2006b). Of scaler hierarchies and welfare redesign: child care in three Canadian cities. *Transactions of the Institute of British Geographers, 31*(4), 452-466.

Mahon, R. (2007). Challenging National Regimes from below: Toronto child-care politics. *Politics and Gender, 3*, 55-78.

Mahon, R. (2008). Varieties of Liberalism: Canadian Social Policy from the 'Golden Age' to the Present. *Social Policy & Administration, 42*(4), 342-361. doi: 10.1111/j.1467-9515.2008.00608.x

Mahon, R. (2009a). Canada's Early Childhood Education and Care Policy: Still a Laggard? *International Journal of Child Care and Education Policy, 3*(1), 27-42.

Mahon, R. (2009b). The OECD's Discourse on the Reconciliation of Work and Family Life. *Global Social Policy, 9*(2), 183-204.

Mahon, R. (2010a). After neo-liberalism?: The OECD, the World Bank and the child. *Global Social Policy, 10*(2), 172-192.

Mahon, R. (2010b). Learning, Forgetting and Rediscovering: Producing the OECD's "New" Family Policy. In K. Martens & A. P. Jakobi (Eds.), *Mechanisms of OECD Governance* (pp. 198-216). Oxford: Oxford University Press.

Mahon, R. (2013). Childcare, New Social Risks, and the New Politics of Redistribution in Ontario. In K. Banting & J. Myles (Eds.), *Inequality and the Fading of Redistributive Politics* (pp. 359-380). Toronto: UBC Press.

Mahon, R., Anttonen, A., Bergqvist, C., Brennan, D., & Hobson, B. (2012). Convergent care regimes? Childcare arrangements in Australia, Canada, Finland and Sweden. *Journal of European Social Policy, 22*(4), 419-431. doi: 10.1177/0958928712449776

Mahon, R., & Collier, C. (2010). Navigating the shoals of Canadian federalism. In M. Haussman, M. Sawer & J. Vickers (Eds.), *Federalism, Feminism and Multilevel Governance* (pp. 51-66). Vancouver: Ashgate.

Mahon, R., & Phillips, S. (2002). Dual-Earner families caught in a liberal welfare regime? The politics of child care policy in Canada. In S. Michel & R. Mahon

(Eds.), *Child care policy at the crossroads: gender and welfare state restructuring* (pp. 191-218). New York: Routledge.

Mangan, J. (2000). *Workers without traditional employment: an international study of non-standard work*. Cheltenham: Edward Elgar Publishing.

Martin, S. (1987). *Sharing the Responsibility: Report of the Special Committee on Child Care*. Ottawa: Queen's Printer.

Mas, S. (2013, August 15). Foreign nannies and caregivers fee to cost families $275. Retrieved from http://www.cbc.ca/news/politics/foreign-nannies-and-caregivers-fee-to-cost-families-275-1.1381800

McCain, M. N., & Mustard, J. F. (1999). *Reversing the real brain drain: Early years study final report*. Toronto: Canadian Institute for Advanced Research.

McDonald, P., Bradley, L. M., & Guthrie, D. (2005). Good Mothers, Bad Mothers: Exploring the Relationship between Attitudes towards Nonmaternal Childcare and Mother's Labour Force Participation. *Journal of Family Studies, 11*(1), 62-82.

McGillivray, G. (2008). Nannies, nursery nurses and early years professionals: constructions of professional identity in the early years workforce in England. *European Early Childhood Education Research Journal, 16*(2), 242-254.

McIntosh, G., & Phillips, J. (2002). Commonwealth Support for Childcare. Retrieved 26 June 2014, from Parliament of Australia http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/Publications_Archive/archive/childcaresupport

McKeen, W. (2007). The National Children's Agenda: A neoliberal wolf in lamb's clothing. *Studies in Political Economy, 80*, 151-173.

Meagher, G. (1997). Recreating "Domestic Service": Institutional Cultures and the Evolution of Paid Household Work. *Feminist economics, 3*(2), 1-27. doi: 10.1080/135457097338681

Meagher, G. (2000). A Struggle for Recognition: Work Life Reform in the Domestic Services Industry. *Economic and Industrial Democracy, 21*(1), 9-37. doi: 10.1177/0143831x00211002

Meagher, G. (2007a). The Challenge of the Care Workforce: Recent Trends and Emerging problems. *Australian Journal of Social Issues, 42*(2), 151-167.

Meagher, G. (2007b). Contested, corporatised and confused? Australian attitudes to child care. In E. Hill, B. Pocock & A. Elliott (Eds.), *Kids Count: Better early childhood education and care in Australia* (pp. 137-153). Sydney: Sydney University Press.

Meyers, M., K. , & Gornick, J., C. . (2003). Public or Private Responsibility? Early Childhood Education and Care, Inequality, and the Welfare State*. *Journal of Comparative Family Studies, 34*(3), 379-410.

Michel, S., & Mahon, R. (2002). *Child care policy at the crossroads: gender and welfare state restructuring*. New York: Routledge.

Michel, S., & Peng, I. (2012). All in the family? Migrants, nationhood, and care regimes in Asia and North America. *Journal of European Social Policy, 22*(4), 406-418. doi: 10.1177/0958928712449774

Militec, D., & Browne, R. (2013, November 18). Productivity Commission childcare hearings likely to pit nanny against centre *Sydney Morning Herald*. Retrieved from http://www.smh.com.au/federal-politics/political-news/productivity-

commission-childcare-hearings-likely-to-pit-nanny-against-centre-20131118-2xrcl.html#ixzz2n8lUeZtL

Ministry of Education. (2012). *Modernizing Child Care in Ontario: Starting conversations, strengthening partnerships, working together*. Toronto: Ontario Government.

Morel, N. (2007). From Subsidiarity to 'Free Choice': Child- and Elder-care Policy Reforms in France, Belgium, Germany and the Netherlands. *Social Policy & Administration, 41*(6), 618-637. doi: 10.1111/j.1467-9515.2007.00575.x

Morel, N. (2012). The political economy of domestic work in France and Sweden in a European perspective. In Socio-Fiscal Policies Research Group (Ed.), *LIEPP Working Paper*. Paris: Sciences Po.

Morel, N., Palier, B., & Palme, J. (2009). What future for social investment? In Institute for Future Studies (Ed.), *Research Report*. Stockholm: Institute for Future Studies.

Morel, N., Palier, B., & Palme, J. (2012). *Towards a Social Investment Welfare State?: Ideas, Policies and Challenges*. Bristol: The Policy Press.

Morgan, K. J. (2003). Child Care and the Liberal Welfare Regime: A Review Essay. *Review of Policy Research, 20*(4), 743-748. doi: 10.1046/j.1541-1338.2003.00050.x

Morgan, K. J. (2005). The "production" of child care: How labor markets shape social policy and vice versa. *Social Politics: International Studies in Gender, State & Society, 12*(2), 243-263.

Morgan, K. J. (2009). Child care and the social investment model: Political conditions for reform. In N. Morel, B. Palier & J. Palme (Eds.), *What Future for Social Investment?* (pp. 45-54). London: Institute for Future Studies.

Morton, K. (2012, 8 October 2012). New group to lobby Government on registration of all childcarers, *NurseryWorld*. Retrieved from http://www.nurseryworld.co.uk/nursery-world/news/1106290/lobby-government-registration-childcarers

Morton, K. (2013). Childcare costs - fears grow on the future of childcare vouchers. *NurseryWorld*. http://www.nurseryworld.co.uk/nursery-world/news/1097542/childcare-costs-fears-grow-future-childcare-vouchers

Morton, K. (2014). The Queen's Speech 2014: Tax-free childcare and more support for free schools. *NurseryWorld*. http://childcarecanada.org/documents/child-care-news/14/06/queens-speech-2014-tax-free-childcare-and-more-support-free-schools

Moss, P. (2006). Structures, understandings and discourses: possibilities for re-envisioning the early childhood worker. *Contemporary Issues in Early Childhood, 7*(1), 30-41.

Moss, P. (2007). Bringing politics into the nursery: Early childhood education as a democratic practice. *European Early Childhood Education Research Journal, 15*(1), 5-20.

Moss, P. (2009). There are alternatives! Markets and democratic experimentalism in early childhood education and care *Working Papers in Early Childhood Development*. Netherlands: Bernard van Leer Foundation.

Moss, P. (2012). Making Democracy a Fundamental Value: Meaning what exactly? In L. Miller & D. Hevey (Eds.), *Policy Issues in the Early Years* (pp. 94-106). London: Sage Publications.

Myles, J., & Pierson, P. (1997). Friedman's revenge: the reform of "Liberal" welfare states in Canada and the United States. *Politics & Society, 25*(4), 443-472.

NannyTax. (2014). Ofsted registration criteria. Retrieved 21 May, 2014, from http://www.nannytax.co.uk/ofsted-registration-criteria

National In-home Care Association. (2011). Annual Report.

National In-home Care Association. (2014). Submission to the Productivity Commission Inquiry into Childhood and Early Chilhood Learning: National In-home Care Association.

Naumann, I. (2011). Towards the marketization of early childhood education and care? Recent developments in Sweden and the United Kingdom. *Nordic Journal of Social Research, 2*(0).

Neuman, M. (2005). Governance of early childhood education and care: recent developments in OECD countries. *Early Years, 25*(2), 129-141.

Newbury, S., & Brennan, D. (2013). Economic and Social Policy Tensions: Early Childhood Education and Care in a Marketised Environment. *Financial Accountability & Management, 29*(3), 227-245.

Newcombe, E. (2004). Temporary migration to the UK as an 'Au Pair': Cultural exchange or reproductive labour? *Sussex Migration Working Paper no. 21*. Sussex: Sussex Centre for Migration Research.

Nordberg, C. (2012). Localising Global Care Work: A Discourse on Migrant Care Workers in the Nordic Welfare Regime. In G. Boucher, A. Grindsted & T. L. Vicente (Eds.), *Transnationalism in the Global City* (pp. 63-78): DeustoDigital.

NurseryWorld. (2007). Analysis: Voluntary Ofsted childcare register - Nannies reject registration. *NurseryWorld*. http://www.nurseryworld.co.uk/nursery-world/analysis/1089396/analysis-voluntary-ofsted-childcare-register-nannies-rejectregistration

NurseryWorld. (2009). Analysis: A closer look at nanny workforce. Retrieved from NurseryWorld website: http://www.nurseryworld.co.uk/nursery-world/analysis/1093825/analysis-closer-look-nanny-workforce

Nutbrown, C. (2012). Foundations for Quality: The independent review of early education and childcare qualifications *Nutbrown Review*: Department for Education.

O'Connor, J. S. (1993). Gender, class and citizenship in the comparative analysis of welfare state regimes: theoretical and methodological issues. *British journal of Sociology, 44*(3), 501-518.

O'Connor, J. S., Orloff, A. S., & Shaver, S. (1999). *States, markets, families: gender, liberalism, and social policy in Australia, Canada, Great Britain, and the United States*. Cambridge: Cambridge University Press.

O'Connor, J. S., & Robinson, G. (2008). Liberalism, citizenship and the welfare state. In W. v. Oorschot, M. Opielka & B. Pfau-Effinger (Eds.), *Culture and Welfare State* (pp. 29-49). Cheltenham: Edward Elgar.

Office for National Statistics. (2013). Full report - Women in the labour market. London: Office for National Statistics.

Ofsted. (2014a). Childcare Register requirements: Childminders and home childcarers, A childcare factsheet. London: Ofsted.

Ofsted. (2014b). The Early Years and Childcare Registers. Retrieved 14 May 2014, 2014, from http://www.ofsted.gov.uk/early-years-and-childcare/our-early-years-childcare-work/early-years-and-childcare-registers

Olsen, J. P., & March, J. G. (1989). Rediscovering institutions: The organizational basis of politics. New York: Free Press.

Ontario Coalition for Better Child Care. (2014). Ontario needs a stronger system of public and not-for-profit child care: let's do it right! *OCBCC Response - Proposed Amendments to Regulation 262*. Toronto: Ontario Coalition for Better Child Care.

Organisation for Economic Co-operation and Development. (2005). Babies and Bosses - Reconciling Work and Family Life (Volume 4) Canada, Finland, Sweden and the United Kingdom. Paris: Organisation for Economic Co-operation and Development.

Organisation for Economic Co-operation and Development. (2006). *Starting Strong II: Early Childhood Education and Care*. Paris: Organisation for Economic Co-operation and Development.

Organisation for Economic Co-operation and Development. (2013). OECD Tax Database. Paris: Organisation for Economic Co-operation and Development.

Organisation for Economic Co-operation and Development. (2014). OECD Family Database. Paris: OECD.

Orloff, A. S. (1993). Gender and the social rights of citizenship: the comparative analysis of gender relations and welfare states. *American sociological review, 58*(3), 303-328.

Orloff, A. S., & Palier, B. (2009). The power of gender perspectives: Feminist influence on policy paradigms, social science, and social politics. *Social Politics: International Studies in Gender, State & Society, 16*(4), 405-412.

Osgood, J. (2006). Professionalism and performativity: the feminist challenge facing early years practitioners. *Early Years, 26*(2), 187-199.

Osgood, J. (2009). Childcare workforce reform in England and 'the early years professional': A critical discourse analysis. *Journal of Education Policy, 24*(6), 733-751.

Owen, S. (1988). The 'unobjectionable' service: A legislative history of childminding. *Children & society, 2*(4), 367-382. doi: 10.1111/j.1099-0860.1988.tb00559.x

Owen, S. (2003). The Development of Childminding Networks in Britain. In A. Mooney & J. Statham (Eds.), *Family day care: International perspectives on policy, practice and quality* (pp. 78). London: Jessica Kingsley Publishers.

Padamsee, T. J. (2009). Culture in connection: Re-contextualizing ideational processes in the analysis of policy development. *Social Politics: International Studies in Gender, State & Society, 16*(4), 413-445.

Peng, I. (2011). Social Investment Policies in Canada, Australia, Japan, and South Korea. *International Journal of Child Care and Education Policy, 5*(1), 45 - 53.

Penn, H. (2007). Childcare Market Management: how the United Kingdom Government has reshaped its role in developing early childhood education and care. *Contemporary Issues in Early Childhood, 8*(3), 192-207.

Penn, H. (2009a). Early childhood education and care. Key lessons from research for policy makers. Brussels: Network of Experts in Social Sciences of Education and Training (NESSE) for the European Commission.

Penn, H. (2009b). International Perspectives On Quality in Mixed Economies of Childcare. *National Institute Economic Review, 207*(1), 83-89. doi: 10.1177/0027950109103687

Penn, H. (2009c). Public and private: the history of early education and care institutions in the United Kingdom. In K. Scheiwe & H. Willekens (Eds.), *Child care and preschool development in Europe: Institutional perspectives* (pp. 105-125). Hampshire: Palgrave Macmillan.

Penn, H. (2011). Policy Rationles for Early Childhood Services. *International Journal of Child Care and Education Policy, 5*(1), 1 - 16.

Penn, H. (2012). Childcare markets: Do they work? *Occasional Paper No. 26*. Toronto: Childcare Resource and Research Unit.

Penn, H., & Lloyd, E. (2013). The Costs of Childcare. In T. C. W. R. Centre (Ed.). London: Childhood Wellbeing Research Centre.

Peters, B. G. (2011). *Institutional Theory in Political Science: The New Institutionalism* (3 ed.). London, UK: Bloomsbury Academic.

Petrie, A. (1991). Family Day Care Schemes: entrapment of liberation for women? . *Hecate, 17*(1), 61.

Pfau-Effinger, B. (1998). Gender cultures and the gender arrangement—a theoretical framework for cross-national gender research. *Innovation: The European Journal of Social Science Research, 11*(2), 147-166. doi: 10.1080/13511610.1998.9968559

Pfau-Effinger, B. (2004). Socio-historical paths of the male breadwinner model–an explanation of cross-national differences. *The British journal of sociology, 55*(3), 377-399.

Pfau-Effinger, B. (2005a). Culture and welfare state policies: Reflections on a complex interrelation. *Journal of Social Policy, 34*(1), 3-20.

Pfau-Effinger, B. (2005b). Development paths of care arrangements in the framework of family values and welfare values. In B. Pfau-Effinger & B. Geissler (Eds.), *Care and social integration in European societies* (pp. 21–45). Bristol: Policy Press.

Pfau-Effinger, B. (2005c). Welfare state policies and the development of care arrangements *European Societies, 7*(2), 321-347. doi: 10.1080/14616690500083592

Pfau-Effinger, B. (2006). Cultures of childhood and the relationship of care and employment in European welfare states. In J. Lewis (Ed.), *Children, changing families and welfare states* (pp. 137-153). Cheltenham: Edward Elgar.

Phillips, S., & Mahon, R. (2002). Dual-Earner Families Caught in a Liberal Welfare Regime? The Politics of Child Care Policy in Canada. In S. Michel & R. Mahon (Eds.), *Child care policy at the crossroads: gender and welfare state restructuring* (pp. 191-219). London: Routledge.

Pierson, P. (1996). The new politics of the welfare state. *World politics, 48*(2), 143-179.

Pierson, P. (2000a). Increasing Returns, Path Dependence, and the Study of Politics. *The American Political Science Review, 94*(2), 251-267.

Pierson, P. (2000b). Three worlds of welfare state research. *Comparative Political Studies, 33*(6-7), 791-821.

Pierson, P., & Skocpol, T. (2002). Historical institutionalism in contemporary political science. In I. Katznelson & H. V. Milner (Eds.), *Political Science: State of the Discipline* (Vol. 3, pp. 693-721). New York: W.W. Norton.

Pocock, B. (2005). Work/Care Regimes: Institutions, Culture and Behaviour and the Australian Case. *Gender, Work & Organization, 12*(1), 32-49.

Pratt, G. (1999). From Registered Nurse to Registered Nanny: Discursive Geographies of Filipina Domestic Workers in Vancouver, BC*. *Economic Geography, 75*(3), 215-236.

Pratt, G. (2003). Valuing childcare: troubles in suburbia. *Antipode, 35*(3), 581-602.

Pratt, G. (2012). *Families apart: Migrant mothers and the conflicts of labor and love*. Minnesota: University of Minnesota Press.

Prentice, S. (1996). Theorizing political difference in Toronto's postwar child care movement *Occasional Paper No. 8*. Toronto: Childcare Resource and Research Unit.

Prentice, S. (2001). *Changing child care: Five decades of child care advocacy and policy in Canada*. Nova Scotia: Fernwood Publishing Co Ltd.

Prentice, S. (2009). High Stakes: The "Investable" Child and the Economic Reframing of Childcare. *Signs, 34*(3), 687-710.

Press, F., & Woodrow, C. (2005). Commodification, corporatisation and children's spaces. *Australian Journal of Education, 49*(3), 278-291.

Presser, H. B., Gornick, J. C., & Parashar, S. (2008). Gender and nonstandard work hours in 12 European countries. *Monthly Labour Review*, 83-103.

Pritchard, T. (2004). A nanny is a nanny. *NurseryWorld*. Retrieved from NurseryWorld website: http://www.nurseryworld.co.uk/nursery-world/news/1101188/nanny-nanny

Productivity Commission. (2014). Childcare and Early Childhood Learning - Draft Report. Canberra: Productivity Commission.

Professional Association for Childcare and Early Years. (2013). History of PACEY. Retrieved 27 June, 2014, from http://www.pacey.org.uk/about/history_of_pacey.aspx

Rabble.ca. (2010). No genuine national childcare until the Live-in Caregiver Progrm is scapped, Magkaisa Centre organizations assert. http://rabble.ca/babble/news-rest-us/no-genuine-national-childcare-until-live-caregiver-program-scrapped-magkaisa-cen

Randall, V. (1995). The irresponsible state? The politics of child daycare provision in Britain. *British Journal of Political Science, 25*, 327-348.

Randall, V. (1996). The politics of childcare policy. *Parliamentary Affairs, 49*(1), 176-190.

Randall, V. (2002). Child Care in Britain, or, How do you restructure nothing? In S. Michel & R. Mahon (Eds.), *Child care policy at the crossroads: gender and welfare state restructuring* (pp. 219-238). New York: Routledge.

Randall, V. (2004). The making of local child daycare regimes: past and future. *Policy & Politics, 32*, 3-20. doi: 10.1332/030557304772860012

Rantalaiho, M. (2010). Rationalities of cash-for-childcare: the Nordic case. In J. Sipila, K. Repo & T. Rissanen (Eds.), *Cash-for-Childcare. The consequences for Caring Mothers* (pp. 109-142). Cheltenhamn: Edward Elgar Publishing.

Rapoport, B., & Le Bourdais, C. (2008). Parental time and working schedules. *Journal of Population Economics, 21*(4), 903-932.

Regulation Matters. (2013). Regulation Matters. Retrieved 13 December, 2013, from http://regulationmatters.co.uk/blog/

Richardson, B., Langford, R., Friendly, M., & Rauhala, A. (2013). From Choice to Change: an analysis of the 'choice' discourse in Canada's 2006 federal election. *Contemporary Issues in Early Childhood, 14*(2), 155-167.

RPR Consulting. (2005). *Final Evaluation Report: In Home Care*. Canberra: Department of Family and Community Services.

Rush, E., & Downie, C. (2006). *ABC Learning Centres: A Case-study of Australia's Largest Child Care Corporation*. Canberra: Australia Institute.

Rutter, J., & Evans, B. (2011). Informal Childcare: Choice or Chance? A Literature review. In Daycare Trust (Ed.). London: Daycare Trust.

Rutter, J., & Evans, B. (2012). Childcare for Parents with Atypical Work Patterns: The need for flexibility *Informal Childcare Research Paper Three*. London: Daycare Trust.

Sainsbury, D. (1996). *Gender, equality and welfare states*. Cambridge: Cambridge University Press.

Salamon, L. M., & Elliott, V. (Eds.). (2002). *The tools of government: A guide to the new governance*. New York: Oxford University Press.

Saraceno, C. (2011). Childcare needs and childcare policies: A multidimensional issue. *Current Sociology, 59*(1), 78-96. doi: 10.1177/0011392110385971

Scheiwe, K., & Willekens, H. (Eds.). (2009). *Child care and preschool development in Europe: institutional perspectives*. Hampshire: Palgrave Macmillan.

Schlesinger, B. (1971). Status of Women in Canada: Summary of Commission Recommendations. *The Family Coordinator, 20*(3), 253-258.

Schmidt, V. A. (2008). Discursive Institutionalism: The Explanatory Power of Ideas and Discourse. *Annual review of political science, 11*(1), 303-326. doi: doi:10.1146/annurev.polisci.11.060606.135342

Schmidt, V. A. (2010). Taking ideas and discourse seriously: explaining change through discursive institutionalism as the fourth 'new institutionalism'. *European Political Science Review, 2*(1), 1-25.

Schmidt, V. A. (2011). Reconciling ideas and institutions through Discursive Institutionalism. In D. Beland & R. Cox (Eds.), *Ideas and politics in social science research* (pp. 47-64). New York: Oxford University Press.

Scottish Social Services Council. (2011). Qualifications for practitioners in day care of children services. Retrieved 21 May, 2014, from http://www.sssc.uk.com/All-about-Registration/qualification-criteria-managers-in-care-at-home-services.html

Shaver, S. (1990). Gender, social policy regimes and the welfare state. In Social Policy Research Centre (Ed.), *Discussion Papers* (pp. 23). Sydney: Social Policy Research Centre.

Shaver, S. (2000). Inequalities, Regimes, and Typologies. *Social Politics: International Studies in Gender, State & Society, 7*(2), 215-219. doi: 10.1093/sp/7.2.215

Shutes, I., & Chiatti, C. (2012). Migrant labour and the marketisation of care for older people: The employment of migrant care workers by families and service providers. *Journal of European Social Policy, 22*(4), 392-405.

Simonazzi, A. (2009). Care regimes and national employment models. *Cambridge Journal of Economics, 33*(2), 211-232.

Simpson, D. (2010a). Becoming professional? Exploring early years professional status and its implications for workforce reform in England. *Journal of Early Childhood Research, 8*(3), 269-281.

Simpson, D. (2010b). Being professional? Conceptualising early years professionalism in England. *European Early Childhood Education Research Journal, 18*(1), 5-14.

Singh, S. (n.d.). Domestic Problems. *Herizons: Women's news and feminist views*. http://www.herizons.ca/node/524

Sipilä, J., Repo, K., & Rissanen, T. (2010). *Cash-for-childcare: the consequences for caring mothers*. Cheltenham: Edward Elgar Publishing.

Sjöberg, O. (2004). The Role of Family Policy Institutions in Explaining Gender-Role Attitudes: A Comparative Multilevel Analysis of Thirteen Industrialized Countries. *Journal of European Social Policy, 14*(2), 107-123. doi: 10.1177/0958928704042003

Skinner, C., & Finch, N. (2006). Lone parents and informal childcare: a tax credit childcare subsidy? *Social Policy & Administration, 40*(7), 807-823.

Slavkov, N. (2003). *Legitimizing inequalities through language use: Critical analysis of the Canadian government's discourse on the Live-in Caregiver Program.* (M.A.), York University, Toronto.

Smith, R., Poole, E., Perry, J., Wollny, I., Reeves, A., Coshall, C., . . . Bryson, C. (2010). Childcare and early years survey of parents 2009. In Department for Education (Ed.), *Research Report RR-054*. London: Department for Education.

Smith, T. (2007). Early Years services in Britain 1997-2007: a quiet revolution? *Journal of Children's Services, 2*(2), 26-38.

Smyth, C. (2014). Boost your preschooler's brain power! An analysis of advice to parents from an Australian government-funded website. *Women's Studies International Forum, 45*, 10-18.

Social Issues Research Centre. (2009). The composition, needs and aspirations of the nanny workforce in England. Oxford: Social Issues Research Centre.

Sollund, R. (2010). Regarding au pairs in the Norwegian welfare state. *European Journal of Women's Studies, 17*(2), 143-160.

Standing Committee on Family and Human Services. (2006). *Balancing Work and Family: Report on the inquiry into balancing work and family*. Canberra: The Parliament of the Commonwealth of Australia.

Stasiulis, D., & Bakan, A. B. (1997). Negotiating citizenship: the case of foreign domestic workers in Canada. *Feminist Review*(57), 112-139.

Statham, J., & Mooney, A. (2003). *Around the clock: Childcare services at atypical times*. Bristol: Policy Press.

Steinmo, S. (2008). Historical institutionalism. In D. della Porta & M. Keating (Eds.), *Approaches and methodologies in the social sciences* (pp. 118-138). Cambridge: Cambridge University Press.

Stiell, B., & England, K. I. M. (1997). Domestic Distinctions: Constructing difference among paid domestic workers in Toronto. *Gender, Place & Culture, 4*(3), 339-360. doi: 10.1080/09663699725387

Strazdins, L., Korda, R. J., Lim, L. L., Broom, D. H., & D'Souza, R. M. (2004). Around-the-clock: parent work schedules and children's well-being in a 24-h economy. *Social Science & Medicine, 59*(7), 1517-1527.

Streeck, W., & Thelen, K. (2005). *Institutional change in advanced political economies*. Oxford: Oxford University Press.

Sumsion, J. (2006a). The corporatization of Australian childcare: towards an ethical audit and research agenda. *Journal of Early Childhood Research, 4*(2), 99-120.

Sumsion, J. (2006b). From Whitlam to economic rationalism and beyond : a conceptual framework for political activism in children's services. *Australian Journal of Early Childhood, 31*(1), 1-9.

Sumsion, J. (2013). ABC Learning and Australian early childhood education and care: a retrospective ethical audit of a radical experiment. In E. Lloyd & H. Penn (Eds.), *Childcare markets: Can they deliver an equitable service?* (pp. 209-226). Bristol: Policy Press.

Sweeney, T., & Jamrozik, A. (1982). Services for young children: Welfare service or social parenthood? *SWRC Reports and Proceedings*. Sydney: Social Welfare Research Centre.

Taylor-Gooby, P. (1998). *Choice and public policy: the limits to welfare markets*. New York: St. Martin's Press.

Teghtsoonian, K. (1993). Neo-Conservative Ideology and Opposition to Federal Regulation of Child Care Services in the United States and Canada. *Canadian Journal of Political Science/Revue canadienne de science politique, 26*(1), 97-121. doi: doi:10.1017/S000842390000247X

Teghtsoonian, K. (1995). Work and/or Motherhood: The Ideological Construction of Women's Options in Canadian Child Care Policy Debates. *Canadian Journal of Women & Labour, 8*, 411-439.

Teppo, K. (2010). Lone mothers and the puzzles of daily life: do care regimes really matter? *International Journal of Social Welfare, 19*, 390-401. doi: 10.1111/j.1468-2397.2009.00682.x

Thelen, K. (1999). Historical institutionalism in comparative politics. *Annual review of political science, 2*(1), 369-404.

Thériault, L. (2006). National Post and the Nanny State: Framing the Child Care Debate in Canada. *Canadian Review of Social Policy/Revue canadienne de politique sociale*(56), 140-148.

Thompson, S., & Ben-Galim, D. (2014). Childmind the gap: Reforming childcare to support mothers into work. London: Institute for Public Policy Research.

Timpson, A. M. (2001). *Driven apart: Women's employment equality and child care in Canadian public policy*. Vancouver: UBC Press.

Tronto, J. C. (2002). The "nanny" question in feminism. *Hypatia, 17*(2), 34-51.

Tweed, J. (2002a, 20 June 2002). Nannies snubbed in move on new status, *NurseryWorld*. Retrieved from http://www.nurseryworld.co.uk/nursery-world/news/1084310/nannies-snubbed-status

Tweed, J. (2002b). Ofsted is proposed to register nannies. *NurseryWorld*. http://www.nurseryworld.co.uk/article/728323/ofsted-proposed-register-nannies

Tweed, J. (2003a). Nanny register is put off by minister. *NurseryWorld*. http://www.nurseryworld.co.uk/article/723920/nanny-register-put-off-minister

Tweed, J. (2003b). New nanny register campaign. *NurseryWorld*. http://www.nurseryworld.co.uk/article/715315/new-nanny-register-campaign

Tweed, J. (2004). Childcare tax credit extends to nannies. *NurseryWorld*. http://www.nurseryworld.co.uk/article/714612/childcare-tax-credit-extends-nannies

Tyyska, V. (1994). Women facing the state: Childcare policy process in Canada and Finland, 1960–90. *Nora, Nordic Journal of Women's Studies, 2*(2), 95-106.

Tyyska, V. (1998). Insiders and outsiders: Women's movements and organizational effectiveness. *The Canadian Review of Sociology and Anthropology, 35*(3), 391-410.

Tyyska, V. (2001). Advocacy Ignored: Child Care Policy in Ontario in the 1990s. In S. Prentice (Ed.), *Changing Child Care: Five Decades of Child Care Advocacy and Policy in Canada* (pp. 133-152). Halifax: Fernwood Publishing.

Tyyskä, V. (1995). *The politics of caring and the welfare state: the impact of the women's movement on child care policy in Canada and Finland, 1960-1990*: Suomalainen tiedeakatemia.

UK Government. (2014a). Au pairs: employment law. Retrieved 21 May, 2014, from https://www.gov.uk/au-pairs-employment-law

UK Government. (2014b). Help with childcare costs. Retrieved 21 May, 2014, from https://www.gov.uk/help-with-childcare-costs/childcare-tax-credits

UK Government. (2014c). Landmark Children and Families Act 2014 gains royal assent. *Press release.* Retrieved 21 May, 2014, from https://www.gov.uk/government/news/landmark-children-and-families-act-2014-gains-royal-assent

Ungerson, C. (1997). Social politics and the commodification of care. *Social Politics: International Studies in Gender, State & Society, 4*(3), 362-381.

UNICEF. (2008). The child care transition: A league table of early childhood education and care in economically advanced countries *Innocenti Report Card*. Paris: UNICEF.

United Voice. (2012). Professional Wages Proposal for Early Childhood Education and Care *2013 ECC Federal Budget Submission*: United Voice.

Uren, K. (2013, April 13). Having a nanny is becoming a popular child care choice for families, *Adelaide Now*. Retrieved from http://www.adelaidenow.com.au/ipad/having-a-nanny-is-becoming-a-popular-child-care-choice-for-families/story-fn3o6wog-1226618281224

Van Oorschot, W., Opielka, M., & Pfau-Effinger, B. (2008). *Culture and welfare state: Values and social policy in comparative perspective*. Cheltenham: Edward Elgar Publishing.

Vincent, C., & Ball, S. J. (2006). *Childcare, choice and class practices: middle-class parents and their children*. UK: Taylor & Francis.

Vincent, C., Ball, S. J., & Kemp, S. (2004). The social geography of childcare: making up a middle-class child. *British Journal of Sociology of Education, 25*, 229-244.

Vincent, C., Braun, A., & Ball, S. J. (2008). Childcare, choice and social class: Caring for young children in the UK. *Critical social policy, 28*(1), 5-26.

Vosko, L. F., MacDonald, M., & Campbell, I. (2009). *Gender and the contours of precarious employment*. New York: Routledge.

Warner, M. E., & Gradus, R. H. J. M. (2009). *The Consequences of Implementing a Child Care Voucher: Evidence from Australia, the Netherlands and USA*. Amsterdam: Tinbergen Institute.

White, L. (2001). From Ideal to Pragmatic Politics: National Child Care Advocacy Groups in the 1980s and 1990s. In S. Prentice (Ed.), *Changing Child Care: Five Decades of Child Care Advocacy and Policy in Canada* (pp. 97-116). Halifax: Fernwood Publishing.

White, L. (2002). Ideas and the welfare state: Explaining child care policy development in Canada and the United States. *Comparative Political Studies, 35*(6), 713-743.

White, L. (2011a). *Institutional--Stickiness and Ideational Resistance to Paradigm Change: Canada and Early Childhood Education and Care (ECEC) Policy.*

Paper presented at the Canadian Political Science Asssociation Annual Meeting, Wilfred Laurier University.

White, L. (2011b). The Internationalization of Early Childhood Education and Care Issues: Framing Gender Justice and Child Well Being. *Governance, 24*(2), 285-309.

White, L. (2012). Must We All Be Paradigmatic? Social Investment Policies and Liberal Welfare States. *Canadian Journal of Political Science/Revue canadienne de science politique, 45*(03), 657-683. doi: doi:10.1017/S0008423912000753

White, L., & Friendly, M. (2012). Public Funding, Private Delivery: States, Markets, and Early Childhood Education and Care in Liberal Welfare States – A Comparison of Australia, the UK, Quebec, and New Zealand. *Journal of Comparative Policy Analysis: Research and Practice, 14*(4), 292-310. doi: 10.1080/13876988.2012.699789

Williams, F. (1989). *Social policy: A critical introduction*. Cambridge: Polity Press

Williams, F. (1995). Race/ethnicity, gender, and class in welfare states: A framework for comparative analysis. *Social Politics: International Studies in Gender, State & Society, 2*(2), 127-159.

Williams, F. (2004a). *Rethinking families*. London: Calouste Gulbenkian Foundation.

Williams, F. (2004b). What Matters is who Works: Why Every Child Matters to New Labour. Commentary on the DfES Green Paper Every Child Matters. *Critical social policy, 24*(3), 406-427. doi: 10.1177/0261018304044366

Williams, F. (2008). *Migration and home-based child care in European welfare states.* Paper presented at the ARACY seminar on Early Childhood Education and Childcare, Sydney.

Williams, F. (2009). Claiming and Framing in the Making of Care Policies: The Recognition and Redistribution of Care. Geneva: UNRISD.

Williams, F. (2010a). *Claiming and framing in the making of care policies: the recognition and redistribution of care*. Geneva: United Nations Research Institute for Social Development.

Williams, F. (2010b). Migration and Care: Themes, Concepts and Challenges. *Social Policy and Society, 9*(03), 385-396. doi: doi:10.1017/S1474746410000102

Williams, F. (2011). Markets and migrants in the care economy. *Soundings, 47*(47), 22-33. doi: 10.3898/136266211795427576

Williams, F. (2012a). Care relations and public policy: social justice claims and social investment frames. *Families, Relationships and Societies, 1*(1), 103-119. doi: 10.1332/204674312x633199

Williams, F. (2012b). Converging variations in migrant care work in Europe. *Journal of European Social Policy, 22*(4), 363-376.

Williams, F., & Brennan, D. (2012). Care, markets and migration in a globalising world: Introduction to the Special Issue. *Journal of European Social Policy, 22*(4), 355-362. doi: 10.1177/0958928712449777

Williams, F., & Gavanas, A. (2005). *Intersecting issues of gender,'race', and migration in the changing care regimes of UK, Sweden and Spain.*

Williams, F., & Gavanas, A. (2008). The intersection of childcare regimes and migration regimes: A three-country study. In H. Lutz (Ed.), *Migration and domestic work: a European perspective on a global theme* (pp. 13–28). Farnham, United Kingdom: Ashgate.

Williams, F., Popay, J., & Oakley, A. (1999). *Welfare research: a critical review*. UK: Taylor & Francis.

Wincott, D. (2006). Paradoxes of New Labour Social Policy: Toward Universal Child Care in Europe's "Most Liberal" Welfare Regime? *Social Politics: International Studies in Gender, State & Society, 13*(2), 286-312. doi: 10.1093/sp/jxj011

Wincott, D. (2011). Ideas, policy change and the welfare state. In D. Beland & R. Cox (Eds.), *Ideas and politics in social science research* (pp. 143-166). New York: Oxford University Press.

Woodrow, C. (2008). Discourses of professional identity in early childhood: movements in Australia. *European Early Childhood Education Research Journal, 16*(2), 269-280. doi: 10.1080/13502930802141675

Woodrow, C., & Press, F. (2007). (Re)Positioning the Child in the Policy/Politics of Early Childhood. *Educational Philosophy and Theory, 39*(3), 312-325.

Yanow, D. (2000). *Conducting interpretive policy analysis* (Vol. 47). London: Sage Publications, Inc.

Yeates, N. (2005a). Global care chains: A critical introduction *Global migration perspectives* (Vol. 44). Geneva: Global Commission on International Migration.

Yeates, N. (2005b, December 12-15). *Migration and Social Policy in International Context: the analytical and policy uses of a global care chain perspective.* Paper presented at the New Frontiers of Social Policy, Arusha, Tanzania.

Appendices

A Participant information statement and consent form

(see pages below)

THE UNIVERSITY OF NEW SOUTH WALES

Participant information statement and consent form

ECEC in liberal welfare states: Situating In-home child care in policy and cultural discourses

You are invited to participate in a study comparing cross-national approaches to ECEC funding in Australia, the UK and Canada, especially the changing place of in-home child care within government policy. This study hopes to learn about the origins, culture and discourses about in-home child care and to gain a better understanding of current policy mechanisms influencing in-home child care. You were selected as a possible participant in this study because of your knowledge and experience in the ECEC sector in [*country*].

Overview of study

If you decide to participate, I will conduct an interview with you in order to learn more about your knowledge, opinions, perspectives and experience in the ECEC sector. The interview will last approximately 45 minutes, and you are free to end the interview at any point if you do not wish to continue. I will take notes during the interview and, the interview will be audio-recorded for transcription purposes with your consent.

Potential benefits of study

It is intended that the findings from the interviews conducted with you and other stakeholders will contribute to our understanding of the different trajectories of ECEC and in-home child care in liberal welfare states, Findings from the interviews will inform further research about the reasons behind government decisions about ECEC and in-home child care, and the types of actors, pressures and events that are influential in policy design. A cross-national comparison with other similar English-speaking countries also has the potential to benefit policy makers and stakeholders in the field by furthering their knowledge and understanding of similar ECEC policy systems.

What will we do with the information you provide us with?

Any information that is obtained in connection with this study and that can be identified by you will remain confidential and will be disclosed only with your permission, except as required by law. If you give us your permission by signing this document, the information you share will be used toward the completion of my PhD thesis, to be submitted to the University of New South Wales in 2014. The information you provide may also be used toward publication in journals, and dissemination through conferences and seminars. In any publication, information will be provided in such a way that you cannot be identified. Any findings that are published using the information you provided to me can be disseminated upon request.

What if I have questions or concerns about the study?

Complaints may be directed to the Ethics Secretariat, The University of New South Wales, SYDNEY 2052 AUSTRALIA (phone 9385 4234, fax 9385 6648, email ethics.sec@unsw.edu.au). Any complaint you make will be investigated promptly and you will be informed out the outcome.

What do I do now?

Your decision whether or not to participate will not prejudice your future relations with the University of New South Wales (and the participating organisation[s]). If you decide to participate, you are free to withdraw your consent and to discontinue participation at any time without prejudice.

If you have any questions, please feel free to ask me. If you have any additional questions later, I will be happy to answer them (Elizabeth Adamson, phone: +61 2 9385 5358, email: e.adamson@unsw.edu.au). You may also contact my supervisor, Professor Deborah Brennan, with any questions or concerns (phone: +61 2 9385 7843 or email: d.brennan@unsw.edu.au).

You will be given a copy of this form to keep.

THE UNIVERSITY OF NEW SOUTH WALES

PARTICIPANT INFORMATION STATEMENT AND CONSENT FORM (continued)

ECEC in liberal welfare states: Situating In-home child care in policy and cultural discourses

REVOCATION OF CONSENT

ECEC in Australia, the UK and Canada: In-home child care in discourse and culture

I hereby wish to **WITHDRAW** my consent to participate in the research proposal described above and understand that such withdrawal **WILL NOT** jeopardise any treatment or my relationship with The University of New South Wales

Signature………………………………………   Date…………………………………………………

....

Please PRINT Name

The section for Revocation of Consent should be forwarded to *Elizabeth Adamson, Social Policy Research Centre, Level 2, John Goodsell Building, University of New South Wales, 2052, Sydney, NSW, Australia*. Ph: +61 2 9385 5358

THE UNIVERSITY OF NEW SOUTH WALES

PARTICIPANT INFORMATION STATEMENT AND CONSENT FORM (continued)

ECEC in liberal welfare states: Situating In-home child care in policy and cultural discourses

You are making a decision whether or not to participate. Your signature indicates that, having read the information provided above, you have decided to participate.

……………………………………………
Signature of Research Participant

…………………………………………
Signature of Witness

…………………………………………
 (Please PRINT name)

…………………………………………
(Please PRINT name)

…………………………………………
Date

…………………………………………
Nature of Witness

B Interview schedule

Preamble: *I am interested in the way that stakeholders in the ECEC – including government officials and peak body organisations – engage with policy discourses in developing policy platforms and advocating for reforms. My research is specifically looking at the policy reforms in the area of early childhood education and care in the liberal welfare states of Australia, the UK and Canada since the 1970s to better understand the way in-home child care has evolved through policy reforms, discourses and cultural attitudes. I am interested in your recent experience in the ECEC sector, and the types of ideas and influences your [department/organisation] plays in promoting in-home child care.*

1) **Role and functions of department/organisation**

To start with can you tell me a bit about your organisation, and your position within the organisation?

- What are the vision/goals of the organisation/department/agency?

- What is your organisation's role in funding, regulating and reforming ECEC policy? Other role or function?

- What role do you have in advocating or providing in-home child care services?

2) **ECEC policy and advocacy**

I'd like to talk to you a bit about the key issues and debates around early childhood education and care, from your perspective as a [role/organisation/position]

- What influences these issues and debates?

- Where do these ideas come from?

- Who are the key actors pushing these reforms?

- How does in-home child care fit within these debates?

- Have these debates changed over time?

- Are you views different to other organisations in the sector?

3) Attitudes toward in-home child care

I'm interested in whether you attitudes about nannies and in-home child care have changed over time, or whether they differ across countries.

- Do you think people think nannies are something people want for their children, opposed to centre-based care? Why? Why not?

- What do you think are the optimal care and ECEC arrangements for young children? Is this supported by your organisation?

- Do you think that the public's attitude about ideal care arrangements has changed? When? How? Why?

- Do you think governments influence the public's attitudes toward different types of care? Proper care?

4) Government support for in-home child care

I'm interested in whether there's a place for government to support in-home child care, for example through funding or regulation.

- Does the current government support in-home child care?

- Does it provide other types of financial support to meet families' needs?

- Do you agree with its current policy agenda? Why? Why not?

- What should be the role of government, family and other providers in ECEC provision?

- Do you think there are any issues with governments providing in-home child care? (e.g. quality, gender equality, inequality?) If yes, what can be done to address these issues?

C Example recruitment email

Dear Sir or Madame,

I found the contact details on your website, and I'm wondering whether you might be able to help with some research I am doing. I am a PhD student at the University of New South Wales in Sydney, Australia. My research is looking at early learning and childcare policy in Australia, the UK and Canada, with a particular focus on in-home childcare, provided in the child's home.

Part of my research includes interviews with stakeholders in the early learning and care sector, including government representatives, large charity oganisations providers. I'm going to be in the UK in September and it would be great to speak with someone from ████████████████████, and I'm wondering whether you might be able to put me in touch with someone █████ who might be interested in participating in an interview? I looked at the structure of ████ and saw that ██████████ is responsible for the early years programme, and thought she might be appropriate, but I would be happy to speak with someone from the Senior Management as well. Any help you are able to provide is greatly appreciated. Many thanks and I look forward to hearing from you.

Kindest regards,
Elizabeth

D NVivo coding framework

Name	Sources	References	Created On	Created By	Modified On	Modified By
Descriptions of	0	0	9/01/2013 3	QSRNVIVO	10/03/2013 2:	EA
Govt Policy	50	185	11/01/2013	QSRNVIVO	9/05/2013 9:1	EA
Stakeholder info & priorities	50	116	11/01/2013	QSRNVIVO	9/05/2013 9:0	EA
Types of ECEC	9	12	16/04/2013	EA	9/05/2013 8:3	EA
ECEC issues	0	0	11/01/2013	QSRNVIVO	10/03/2013 2:	EA
Access & affordability	44	93	28/02/2013	EA	9/05/2013 9:0	EA
Additional needs	15	32	28/02/2013	EA	9/05/2013 9:0	EA
Quality	31	60	28/02/2013	EA	9/05/2013 8:1	EA
Regulation	38	87	28/02/2013	EA	8/05/2013 5:4	EA
Safeguarding & minimum standards	24	42	28/02/2013	EA	8/05/2013 5:4	EA
Staff qualifications & training	39	79	28/02/2013	EA	9/05/2013 9:2	EA
Nannies and IHC	0	0	9/01/2013 3	QSRNVIVO	16/04/2013 6:	EA
Cost	31	67	28/02/2013	EA	21/05/2013 5:	EA
Min standards	33	101	28/02/2013	EA	9/05/2013 9:2	EA
Place & status of nannies & IHC	42	146	9/01/2013 3	QSRNVIVO	9/05/2013 8:5	EA
Quality	23	40	28/02/2013	EA	9/05/2013 8:2	EA
Role of nannies & IHC	33	83	9/01/2013 3	QSRNVIVO	9/05/2013 9:3	EA
OTHER	2	3	16/04/2013	EA	16/04/2013 9:	EA
Policy influences	0	0	9/01/2013 3	QSRNVIVO	28/04/2013 10	EA
Care culture	42	123	11/01/2013	QSRNVIVO	8/05/2013 5:5	EA
History & ideology	33	70	9/01/2013 3	QSRNVIVO	8/05/2013 5:2	EA
Policy models	31	63	28/02/2013	EA	9/05/2013 9:1	EA
Politics & Advocacy	47	168	11/01/2013	QSRNVIVO	9/05/2013 9:1	EA
QUOTES	13	26	29/04/2013	EA	9/05/2013 9:1	EA
Themes	0	0	11/01/2013	QSRNVIVO	10/03/2013 2:	EA
Choice	26	48	11/01/2013	QSRNVIVO	9/05/2013 8:5	EA
Education (vs. Care)	43	82	11/01/2013	QSRNVIVO	9/05/2013 9:2	EA
Flexibility	29	63	11/01/2013	QSRNVIVO	9/05/2013 9:3	EA
Formalisation	29	41	11/01/2013	QSRNVIVO	9/05/2013 9:2	EA
Inequality & Class	35	84	28/01/2013	EA	8/05/2013 5:5	EA
Migration	14	38	29/01/2013	EA	8/05/2013 5:4	EA
Privatisation	17	31	11/01/2013	QSRNVIVO	9/05/2013 8:4	EA
Professionalisation	41	97	11/01/2013	QSRNVIVO	9/05/2013 9:2	EA
Recognition	35	81	11/01/2013	QSRNVIVO	9/05/2013 9:1	EA
Redistribution	31	80	21/01/2013	QSRNVIVO	8/05/2013 5:1	EA
Representation	31	86	11/01/2013	QSRNVIVO	8/05/2013 5:1	EA
Rights	14	27	11/01/2013	QSRNVIVO	8/05/2013 5:1	EA
Social investment	21	34	9/01/2013 3	QSRNVIVO	9/05/2013 9:1	EA