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# **Early years provision and children's life chances**

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Government support for early years provision has multiple policy aims relating to social mobility, economic wellbeing and social justice. Good early education for all three-, four- and five-year-olds and disadvantaged two-year-olds promotes children's all-round development and prepares them for formal learning in school. This is meant to lay the foundation for children's social mobility, particularly for disadvantaged children, via improved educational outcomes, better employment prospects and a reduced chance of remaining or becoming poor. The more recent economic wellbeing rationale is to facilitate parents' – notably mothers' – access to the labour market, thereby strengthening young families' socio-economic position, and so helping them to avoid or escape poverty. And the social justice aim refers to the role early years provision can play in eliminating social and cultural inequalities and underachievement, and promoting the inclusion of children with learning or physical disabilities.<sup>1</sup>

Arguably, the UK early years system has yet to meet these aims fully. They each imply that governments must make extra efforts to ensure services reach children at risk of being excluded from such provision, yet official statistics confirm that children from poorer families still access less early education and affordable, high-quality childcare than their better-off peers.<sup>2</sup>

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### **Does early years provision matter?**

There is important and reliable evidence of the positive impact of early years provision on children's life chances, and this exerts a major influence on current policy and practice.

This comes first of all from the Effective Provision of Pre-school Education (EPPE) project, a major English longitudinal study commissioned to investigate the impact of pre-school education on the socio-emotional and cognitive development of children aged three to seven years.<sup>3</sup>

Before all three- to five-year-olds gained universal access to early years provision under the 1997 to 2010 Labour governments, the EPPE project (1997–2003) studied 3,000 children attending 141 group settings. The settings were selected from six local authorities in five regions, and included local authority nursery schools and classes, local authority and private day nurseries, playgroups/pre-schools and integrated centres providing care and education, alongside a ‘home’ group of children lacking such an experience, as a comparison group.<sup>4</sup> The research team concluded that evidence for the beneficial impact on children who attended early childhood provision was strong and convincing.<sup>5</sup>

Another key finding from this study was the importance of a positive home learning environment for children’s educational development, alongside the influence of early years provision.<sup>6</sup> Given the nature of some of the current debate around poverty and life chances, it is salutary to note that the children’s home environment proved a more important influence than parents’ social class or levels of education, though these also had an effect.

The Millennium Cohort Study (MCS) is also an important source of information on the impact of early childhood education and care on disadvantaged children aged under three. The approximately 19,000 children recruited to the MCS in 2000/01 were part of the first generation to have experienced the universal roll-out of early education for three- and four-year-olds. It is a representative study, collecting observational, health and psychometric data on children from birth,<sup>7</sup> and it over-samples areas with high densities of ethnic minorities and large numbers of disadvantaged families.

The MCS looked at the association between the type of childcare received in the first nine months and children’s cognitive and behavioural outcomes at age three. It found positive impacts, which varied with the type of childcare and whether children were from disadvantaged families.<sup>8</sup> Formal group care, in day nurseries, was associated with better scores on a measure of school readiness – but only for children from more advantaged groups (these included children in two-parent families, girls and children with better educated mothers). However, there was evidence of a positive, but small, effect for children from disadvantaged groups, including families on benefits. The authors concluded that formal group care at a very young age can reduce educational inequalities between advantaged and disadvantaged children when they reach the age of three.

Many UK policy makers therefore continue to emphasise the value for money of early years programmes and their capacity to transform children’s life chances.

This view has been predominantly informed by evidence from a series of well-designed longitudinal studies of three small-scale American

'demonstration' projects which began in the 1960s. However, each involved poor African American families, none were ever scaled up to have national reach and their continuing relevance to present-day policy making has since been seriously questioned.<sup>9</sup>

Indeed, exasperated by the exaggerated claims being made about the efficacy of early years provision – on its own – in countering the effects of child poverty, the eminent American psychologist Edward Zigler wrote over a decade ago:<sup>10</sup>

Are we sure there is no magic potion that will push poor children into the ranks of the middle class? Only if the potion contains health care, child care, good housing, sufficient income for every family, child rearing environments free of drugs and violence, support for all parents in their roles, and equal education for all students in all schools. Without these necessities, only magic will make that happen.

Zigler, creator of the US Headstart programme, added his voice to those of other senior members of the American Society for Research in Child Development. In several papers summarising the evidence for the role early childhood intervention programmes can play in ameliorating the toxic effects of child poverty, they came to a provocative conclusion: the belief that intervention in the early years, primarily through early childhood education and care, was by itself sufficient to ensure good educational outcomes, and hence better life chances for children, was a form of magical thinking.

Two recent reviews of the evidence of the impact of early childhood care and education provision on outcomes for children growing up in poverty in the UK reached similar conclusions. In an evidence review for the Joseph Rowntree Foundation, Lloyd and Potter concluded that early years provision, even if it was of high quality, on its own could not act as an 'inoculation' against the wide-ranging effects of child poverty.<sup>11</sup>

The review argued that multiple approaches were needed to reduce poverty and address its consequences for children in low-income families – to ensure they benefited not only from good quality early education and care, but also from good healthcare, a safe environment, adequate nutrition, affordable and appropriate housing and access to public services.

More recently, a major meta-analysis of 30 studies published between 2005 and 2015 on the effects of universal early years provision on children's life chances concluded that some long-term gains, ranging from educational achievement to labour market performance, could be attributed to the impact of early years provision – but only for children growing up in poverty and only if the quality of the provision was high.<sup>12</sup>

Overall then, the evidence indicates that good quality, accessible and affordable early years provision matters, but it can only ever be one of several essential components within a wide-ranging anti-poverty strategy.

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## **Ensuring quality and equality in early years provision**

There is convincing international evidence of the need for quality in all forms of early years provision if it is to promote children's wellbeing and their future life chances. Despite this, the latest Ofsted annual early years report for England highlights that the quality of early years provision attended by 18 per cent of children growing up in disadvantaged areas was still less than good.<sup>13</sup> In contrast, in the most advantaged areas, only 8 per cent of children attended early years provision that was less than good.

In addition, nearly a third of disadvantaged two-year-olds did not take up the free provision for which they were eligible, and nearly half the disadvantaged children had failed to reach the expected levels of cognitive and socio-emotional development at the end of the primary school reception year; 44 per cent of these children had not yet caught up at the end of primary school. The situation in Scotland, Wales and Northern Ireland is similar.

Two questions arise: how to achieve the conditions under which high-quality and viable early years provision can thrive in the UK, and how to ensure equitable access for children growing up with disadvantage. Given the current shortcomings in disadvantaged children's access to quality provision, the recent alarming rise in child poverty<sup>14</sup> and its projected increase by 2020,<sup>15</sup> these pose considerable challenges.

Some answers can be found in a blueprint produced by the European Commission for an early years system offering good quality and affordable early childhood education and care (ECEC) accessible to all children, including the poorest.<sup>16</sup> This was based on a review of early years provision for children growing up in low-income families across Europe, which identified barriers to their participation, and produced policy recommendations for engaging such children and their families in good-quality services.<sup>17</sup>

- A universal entitlement to publicly funded, affordable ECEC provision from the end of parental leave or, at least, by the age of three or four years.
- The integration of the ECEC regulation, administration and funding systems that promote more equitable access, and a more unified approach to provision.
- A combination of high-quality ECEC centre-based provision and parent

support programmes, such as in family health, parenting skills, adult education and counselling.

- A valued, well-qualified and adequately supported workforce.
- Inter-agency co-operation between ECEC centres, health and social services and local authorities.
- A political commitment toward democracy, equality and civil rights.

While recognising that most European nations had yet to incorporate all these policies into their early years systems, the report made a strong case for doing so. It also recommended linking early years policies to employment, health and social policies aimed at resource redistribution, if disadvantaged children were to benefit optimally.

Admittedly, many of the elements of this approach were present in the British children's centre programme – the provision was universal, they combined centre-based early years and health provision with support for parents, and they were linked to other local services. But despite their demonstrable success in improving children's outcomes,<sup>18</sup> the requirement to provide childcare in them was removed in 2010 and since then funding cuts have forced services to be reduced or closed.

The first of these European policy recommendations prompts the question: to what extent should services be targeted at children growing up in poverty? In the UK, the free education for disadvantaged two-year-olds is an example of such a targeted service, but has failed to reach all targeted children. Indeed, at the time this initiative was extended, there were warnings that redirecting funds from universal children's centres to targeted provision for two-year-olds would be ineffective – targeted extra support needs to be in addition to, not instead of, a strong universal offer.

Another example of targeting is the planned extension in England (from September 2017) from 15 to 30 hours of free early education for three- and four-year-olds whose parents meet certain employment criteria.<sup>19</sup>

Targeting has been a lively and, at times, controversial topic in European discussions on early years systems.<sup>20</sup> The European Commission made clear its position on the inadvisability of targeting in a special statement on the condition of disadvantaged children most at risk from the austerity measures engulfing Europe:<sup>21</sup>

The most successful strategies in addressing child poverty have proved to be those underpinned by policies improving the wellbeing of all children, whilst giving careful consideration to children in particularly vulnerable situations.

Now that Britain has voted to leave the European Union, UK policymakers

may gradually turn to global positions on this matter rather than European policy recommendations. But there is no getting away from the issue. For the first time ever, the United Nation's 2016 Sustainable Development Goals incorporate an explicit target for early years provision. This exhorts nations to ensure inclusive and quality education for all and to promote lifelong learning opportunities for all. Target 4.2 reads:<sup>22</sup>

By 2030, ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education.

That these should be universal early years services is clear, even though many may take issue with their purpose apparently being reduced to that of preparation for compulsory schooling. The term 'early childhood development' used in international organisations reflects the importance attached to health and social care interventions delivered as part of early years programmes.

Targeting of services also contradicts the approach promoted in an influential review of health inequalities in England.<sup>23</sup> This recommended that public funding for early years services development should be focused progressively across the social gradient in an approach that has come to be known as 'proportionate universalism'. This means that policy actions 'must be universal, but with a scale and intensity that is proportionate to the level of disadvantage'.<sup>24</sup> In England, the early years pupil premium, an additional subsidy for disadvantaged children within universal provision, represents this approach, although it is still to become fully embedded.

British psychologist Jack Tizard once observed that a service for the poor was inevitably a poor service.<sup>25</sup> However, it is not just the prevalence of targeted services within the UK's early years system which may interfere with quality. Arguably, the apparent need for targeting originates in the UK's particular service system model: the childcare market.

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## **Access for disadvantaged children**

Guaranteeing disadvantaged children equitable and universal access to high-quality early years provision becomes particularly problematic if a substantial proportion of providers are for-profit businesses, as they are in the UK.<sup>26</sup> The dynamics of competition may drive provision into more prosperous areas, where childcare business viability is less at risk, and

affect service quality.

Although in disadvantaged areas roughly three-quarters of three-year-olds attend state nursery classes and schools, which mostly offer inflexible short sessions, overall the majority of three-year-olds in England now receive their free early education in private provision: 64 per cent in 2016, according to official statistics.<sup>27</sup>

However, parents in search of free early education are not especially welcome in private day nurseries, as their business model relies on the fees parents pay for hours over and above the 15 free ones. This acts as a perverse incentive to childcare businesses to discourage parents from using only the free hours, or indeed from using them at all.<sup>28</sup> Childcare businesses may only offer these hours in restricted sessions or on restricted days, and charging parents inadmissible 'top-up' fees appears to be a common practice.<sup>29</sup>

The risks posed by childcare market dynamics are magnified by austerity and cuts to publicly funded services, with disadvantaged children becoming even more at risk of exclusion from high-quality provision.<sup>30</sup> Among those excluded are children from black and minority ethnic communities, children with additional linguistic or learning needs or disabilities and those growing up in large families. Market dynamics may also put pressure on staff pay, conditions and in-service training, thus affecting one of the key factors in ensuring service quality.<sup>31</sup>

This is particularly likely in areas where parents are on a low income and less able to pay high fees that could, in principle, pay for highly qualified staff. So, private provision in low-income areas is both less sustainable and of poorer quality (although quality in better-off areas also remains mixed).<sup>32</sup>

The UK is virtually unique in Europe in relying on the market to deliver both early education and childcare. In fact, it is one of the most privatised systems in Europe: in other European nations, parents are rarely offered income-related public subsidies, such as tax credits or vouchers, to help them buy childcare.<sup>33</sup>

Probably the most distinctive feature though is the reliance on the market to deliver early education, alongside state nursery schools and classes. In European countries such as France and the Netherlands, early education is delivered exclusively in schools. So, although market dynamics affect childcare service location and quality in the Netherlands in a similar way to in the UK,<sup>34</sup> early education remains immune from them.

In its latest report on the early education entitlement for two-, three- and four-year-olds in England, the National Audit Office homed in on the weaknesses in the way universal early education is delivered.<sup>35</sup> It is dispir-

iting that problems with take-up, identified in a previous CPAG publication, show no sign of being resolved.<sup>36</sup>

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## **Future possibilities**

How to improve the quality, affordability and access to early years provision for disadvantaged children is a major conundrum. The realities of the current market-based system do not match the government's stated intention of promoting children's social mobility, economic wellbeing and social justice through public support.

It seems that restructuring and investing in the UK childcare market will be necessary if the system is to help lift poor children out of poverty and improve their life chances. At a time when families with young children have been bearing the brunt of the government's austerity measures,<sup>37</sup> the chance of this happening appears remote. Nevertheless, certain less drastic policy steps might, at least, partially improve the current situation.

A crucial first step in raising quality across the board would be greater investment in training a graduate-led workforce and continuing professional development opportunities for all early years practitioners.<sup>38</sup> The continuing delays in the publication of the government's workforce development strategy are therefore particularly disappointing.

Budgetary pressures can lead to a range of governmental responses. In the Netherlands, the government has reduced the childcare tax credit subsidy to parents,<sup>39</sup> while in the UK the eligibility criteria for support through the tax and benefits system have been tightened,<sup>40</sup> disadvantaging parents. An alternative response might be to target additional support at children least likely to be able to access high-quality and affordable provision. Or, governments could introduce policies which capitalise on the strengths of private markets, enable them to work more effectively and possibly make them not only more resilient against economic pressures, but also more equitable.

Analysis of OECD data and of government strategies to ensure quality provision in childcare markets shows that one of the most successful forms of government intervention has been the promotion of supply-led systems, whereby public funding goes straight to early years service providers, as well as parental fee capping.<sup>41</sup> In each case, these measures went hand in hand with a substantial investment of public funding in early years services and their infrastructure.

Where such measures have been introduced, the growth of the pri-

vate-for-profit childcare market has been contained in favour of an increased reliance on voluntary, co-operative and state provision. The case of Norway illustrates these dynamics.<sup>42</sup> In the Norwegian mixed childcare market, early education and care for all children below compulsory school age are fully integrated within a heavily state-subsidised system. All types of providers can participate, provided they meet stringent regulatory criteria supervised by local government. More than 50 per cent of Norwegian 'kindergartens' for children aged one to six are now run by private providers, mostly not-for-profit.

Increased regulation of the childcare market was also proposed in a recent study of the relationship between the primary school performance of children in England and their experience of early years provision.<sup>43</sup> The authors identified a lack of impact on disadvantaged children, which they attributed to use of – low-quality – private sector provision. Their recommended solution was that:<sup>44</sup>

...if universal childcare is to be achieved through expansion of private sector provision, as in our case, it is of paramount importance to set high quality requirements for participating providers.

Some examples of what this might look like include: a combination of fee capping with additional public subsidies across the board for all types of providers; additional and more generous subsidies for children with special educational needs and disabilities; guaranteed minimum fees and better employment conditions, including paid professional development opportunities, for childminders; and a comprehensive early years workforce strategy containing the elements already mentioned.

There have been other suggestions for reforming the childcare market. Ten years ago, the OECD review of member states' early years service systems recommended research into the creation of effective 'social markets'.<sup>45</sup> By this, it meant mixed economies of provision, including private not-for-profit and for-profit childcare businesses, possibly operating alongside public provision, which allowed for choice and innovation 'while maintaining a sense of national and community responsibility for services'.<sup>46</sup>

The introduction of such a social market, coupled with a partial or full implementation of the six policies the European Commission considered essential to an anti-poverty early education and childcare system, could mean a new beginning for the UK. In the interests of all children's rights, life chances and wellbeing, we must continue to explore how the UK early years system can be made excellent, equitable and inclusive.

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## Key policy recommendations

- A two-generation approach in which early years provision is combined with support for parents, especially to help them improve the home learning environment, delivered through expanded and fully funded children's centres. Children should be the primary unit of analysis in any evaluation of the impact of such centres.
- Gradual extension of the 30 hours' free childcare offer for three- and four-year-olds, and the part-time offer for two-year-olds, to all children regardless of parents' circumstances. This would require an expansion of maintained sector capacity in nursery schools and classes, as well as in the private, voluntary and independent sector.
- A workforce development strategy to raise quality in the sector, primarily aimed at private providers and backed with investment. Continuing professional development provision should be built in as part of employment conditions for all staff, which would also assist recruitment and retention, and increased public subsidies should be at least partially dependent on providers delivering on this.

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## Suggested indicators to track progress

- Children's educational and socio-emotional development during primary school years
- Parental, especially maternal, employment rates
- Ofsted ratings of early years settings
- Qualifications profile of the early years workforce
- Workforce retention and a reduction in the number of staff vacancies in early years

## Notes

- 1 E Lloyd and S Potter, *Early Education and Childcare and Poverty: working paper prepared for the Joseph Rowntree Foundation*, University of East London, 2014, available at <http://roar.uel.ac.uk/3865>
- 2 Department for Education and Office for National Statistics, *Provision for Children Under Five Years of Age in England, January 2016*, SFR 23/2016, available at [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/532575/SFR23\\_2016\\_Text.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/532575/SFR23_2016_Text.pdf)

- 3 K Sylva, E Melhuish, P Sammons, I Siraj-Blatchford and B Taggart, *The Effective Provision of Pre-School Education (EPPE) Project: findings from the early primary years*, Department for Education and Skills, 2004
- 4 B Taggart, K Sylva, I Siraj-Blatchford, E Melhuish, P Sammons and J Walker-Hall, *Characteristics of the Centres in the EPPE Study: interviews*, Technical Paper 5, Institute of Education, 2000
- 5 See note 3, p3
- 6 EC Melhuish, MB Phan, K Sylva, P Sammons, I Siraj-Blatchford and B Taggart, 'Effects on the home learning environment and preschool center experience upon literacy and numeracy development in early primary school', *Journal of Social Issues*, 64(1), 2008, pp95–114
- 7 F Roberts, S Mathers, H Joshi, K Sylva and E Jones, 'Childcare in the Pre-school Years', in K Hansen, H Joshi and S Dex (eds), *Children of the 21st Century: the first five years*, Policy Press, 2010, pp131–52
- 8 K Hansen and D Hawkes, 'Early childcare and child development', *Journal of Social Policy*, 38(2), 2009, pp211–39
- 9 K Burger, 'How does early childhood care and education affect cognitive development? An international review of the effects of early interventions for children from different social backgrounds,' *Early Childhood Research Quarterly*, 25(2), 2010, pp140–165; H Penn, V Burton, E Lloyd, M Mugford, S Potter and Z Sayeed, *What is Known About the Long-term Economic Impact of Centre-based Early Childhood Interventions?* EPPI-Centre, Institute of Education, University of London, 2006
- 10 E Zigler, 'Forty years of believing in magic is enough', *Social Policy Report*, 17(1), 2003, pp10–11
- 11 See note 1
- 12 T van Huizen and J Plantenga, *Universal Child Care and Children's Outcomes: a meta-analysis of evidence from natural experiments*, Utrecht University School of Economics, 2015
- 13 Ofsted, *Unknown Children – destined for disadvantage?*, 2016
- 14 Department for Work and Pensions, *Households Below Average Income: an analysis of the UK income distribution 1994/5–2014/15*, 2016
- 15 R Joyce, *Child Poverty in Britain: recent trends and future prospects*, Working Paper W15/07, Institute for Fiscal Studies, 2015, available at [www.ifs.org.uk/uploads/publications/wps/WP201507.pdf](http://www.ifs.org.uk/uploads/publications/wps/WP201507.pdf)
- 16 J Bennett, J Gordon and J Edelmann, *Early Childhood Education and Care (ECEC) for Children from Disadvantaged Backgrounds: findings from a European literature review and two case studies. Final report*, European Commission, 2012
- 17 See note 16, p7

- 18 A Bate and D Foster, *Sure Start England*, Briefing Paper 7257, 15 July 2015, House of Commons Library, 2015, available at <http://researchbriefings.files.parliament.uk/documents/CBP-7257/CBP-7257.pdf>
- 19 E Lloyd, 'Early Childhood Education and Care: poverty and access. Perspectives from England,' in L Miller, C Cameron, C Dalli and N Barbour (eds), *Handbook of Early Childhood Policy*, SAGE publishing, forthcoming
- 20 GJ Lindeboom and BJ Duiskool, *Quality in Early Childhood Education and Care*, European Parliament, 2013
- 21 European Commission, *Investing in Children: breaking the cycle of disadvantage*, 2013, Commission Recommendation of 20/02/2013, p2
- 22 United Nations, Sustainable Development Goals, 2016, available from [www.un.org/sustainabledevelopment/sustainable-development-goals/](http://www.un.org/sustainabledevelopment/sustainable-development-goals/)
- 23 The Marmot Review, *Fair Societies, Healthy Lives: strategic review of health inequalities in England post-2010*, University College London, 2010
- 24 See note 23, p15
- 25 J Tizard, Conference Paper, in Department of Health and Social Security, *Low Cost Day Care Provision for Under Fives: papers of a conference held at the Civil Service College, Sunningdale Park, 9–10 January 1976*
- 26 E Lloyd and H Penn, 'Childcare markets in an age of austerity', *European Early Childhood Education Research Journal*, 22(3), 2014, pp386–96;
- 27 See note 2
- 28 K Hignell, *The Practicalities of Childcare: an overlooked part of the puzzle?* Citizens Advice, 2014
- 29 House of Commons Committee of Public Accounts, *Entitlement to Free Early Years Education and Childcare. Fourth Report Session 2016/17*, The Stationery Office, 2016
- 30 See note 26
- 31 P Moss and J Bennett, *Working for Inclusion: an overview of European Union early years services and their workforce*, Children in Scotland, 2010
- 32 See note 13
- 33 H Penn, 'The business of childcare in Europe', *European Early Childhood Research Journal*, 21(4), 2013, pp432–56
- 34 J Noailly and S Visser, 'The impact of market forces on the provision of childcare: insights from the 2005 Childcare Act in the Netherlands', *Journal of Social Policy*, 38(3), 2009, pp477–98; YE Akgunduz and J Plantenga, 'Childcare in the Netherlands: lessons in privatisation', *European Early Childhood Education Research Journal*, 22(3), 2014, pp379–85
- 35 National Audit Office, *Entitlement to Free Early Education and Childcare*, 2016, available at [www.nao.org.uk/wp-content/uploads/2016/03/Entitlement-to-free-early-education-and-childcare.pdf](http://www.nao.org.uk/wp-content/uploads/2016/03/Entitlement-to-free-early-education-and-childcare.pdf)

- 36 E Lloyd, 'Poor children's future access to early years provision,' in L Judge (ed), *Ending Child Poverty by 2020: progress made and lessons learned*, CPAG, 2012, pp50–54
- 37 K Stewart and P Obolenskaya, *The Coalition's Record on the Under Fives: policy, spending and outcomes 2010–2015*, Working Paper 12, Centre for Analysis of Social Exclusion, London School of Economics, 2015
- 38 See note 16
- 39 See note 34
- 40 E Lloyd and H Penn (eds), *Childcare Markets: can they deliver an equitable service?* Policy Press in association with the University of Chicago Press, 2012
- 41 H Penn and E Lloyd, *The Costs of Childcare*, Childhood Wellbeing Research Centre, 2013; H Penn and E Lloyd, 'How can government ensure that early care and education is of high quality in a market system? Learning from international experience', in T Wolfe (ed), *'Childcare': business or profession?* Start Strong, 2014
- 42 AL Ellingsaeter, 'Towards Universal Quality Early Childhood Education and Care: the Norwegian model', in L Gambaro, K Stewart and J Waldfogel (eds), *An Equal Start? Providing early education and care for disadvantaged children*, Policy Press in association with Chicago University Press, 2014, pp53–76
- 43 J Blanden, E Del Bono, S McNally and B Rabe, 'Universal pre-school education: the case of public funding within private provision', *The Economic Journal*, 126, May 2016, pp682–723
- 44 See note 43, p718
- 45 OECD, *Starting Strong II. Early Childhood Education and Care*, 2006
- 46 See note 45, p119